Transport for the South East
Draft Transport Strategy
Draft WSCC consultation response

Summary

The key points of the County Council's response are:

- Overall, the County Council welcomes the draft Transport Strategy as it has contributed information to support its preparation;
- The strategy should be amended to explain how conflicts between journey types will be resolved potentially by explaining how the 'Movement and Place Framework' will be applied in practice;
- Road safety should be added to the list of challenges facing the highway network;
- Highway improvements should also be included in the list of transport strategy interventions needed to deliver the strategy;
- The strategy should continue to give consideration to the other four scenarios in addition to the preferred scenario and explain how the modelled scenarios will be used to guide future decision-making;
- The strategy should state that Health Impact Assessments will be carried out as part of area or thematic studies;
- Amend the priority to improve air quality to encourage shifts towards less polluting modes of transport;
- Amend various initiatives (as outlined in paragraphs 14-29) to ensure they are all specific about the modes of transport they apply to, and the objective of the initiative;
- Set out an ambition to accommodate the additional passenger and employee journeys arising due to airport expansion entirely through increasing the sustainable transport mode share;
- Ensure that area studies provide a programme showing the key stages of work and the scale of the investment required in order to achieve the strategy;
- Include affordability as part of the key principle of; 'putting users at the heart of the transport system';
- Update indicators to ensure they are related to the outcome that TfSE is seeking;
- Assess the impacts on public bodies of using new funding and financing mechanisms;
- Include a key principle that the introduction of any new funding and financing mechanisms will be equitable economically, socially and environmentally; and
- Ensure that mitigation measures are deliverable and taken into account in all value for money assessments.

Introduction

1. This is the draft West Sussex County Council response to the consultation by Transport for the South East on its draft Transport Strategy. The draft consultation response is structured using the sections in the TfSE response questionnaire and provides comments on each of these sections.

The County Council request that these comments are taken into account before the Transport Strategy is finalised.

2.   Overall, the County Council welcomes the draft Transport Strategy as it has contributed information to support its preparation.

Our Approach

Planning for people and places

3.   The aspiration to plan for people and places instead of vehicles is welcome. However, this will be challenging in locations where there are limited alternatives and routes are used to serve a range of different journey types, so there is a need to resolve conflicts between these competing demands. The initiatives listed to tackle the challenges do not adequately explain how conflicts between different journey types and between 'place' and 'link' functions will be resolved. The County Council suggest that the strategy is amended to explain how conflicts will be resolved, potentially by explaining how the 'Movement and Place Framework' will be applied in practice.

Recognising the diversity of transport needs in the South East

4.   The approach should acknowledge the diversity of transport needs in the South East. In locations where large scale development takes place, particularly in rural areas that are not easily served by public transport, some highway improvements are likely to be needed to ensure the network continues to operate efficiently alongside other modes of transport. Therefore, the County Council consider that highway improvements should also be included in the list of transport strategy interventions in paragraph 1.19 that will need to be used to deliver the outcomes the strategy is seeking.

Modelled scenarios

5.   The modelled scenarios represent different possible futures rather than options to be pursued or not pursued. All the scenarios rely on a combination of capital and revenue investment in different schemes and the influence of other factors to deliver the transport outcomes. At this early stage, delivery risks associated with this investment are not fully understood and there are clearly financial, design and political risks that would need to be overcome. There are lots of unknowns that may influence the other factors in a different way to that which is assumed in the preferred 'Sustainable Route to Growth' scenario. Therefore, we consider that the implementation of the strategy should continue to give due consideration to the other four scenarios in addition to the Sustainable Route to Growth scenario as one of these scenarios may be more likely to occur. The County Council request that the strategy is more explicit about how the modelled scenarios will be used to guide future decision-making.

6.   In order to conduct a meaningful and effective Health Impact Assessment (HIA), there is need to understand the affected population and the impacts of the strategy which is difficult to achieve at this scale. As understanding of the affected population and impacts of specific interventions will be more practical at a local level, we suggest that health impacts should be assessed as part of area and thematic studies, including engagement with Public Health officers from the affected area. In order to ensure this takes place, we suggest that the Transport Strategy should specifically state that HIAs will be carried out as part of area or thematic studies.

7.   It is also recommended that in general, reference should be made to 'health and well-being' as this is generally accepted in public policy areas and acknowledges the importance of wider mental well-being in addition to physical health.

Our Area

8.   Use of the Office for National Statistics (ONS) definition of economic hubs means that some important economic hubs in the South East are not specifically identified; for example Littlehampton, Worthing and Shoreham have been combined with Brighton & Hove. These towns are not part of the same urban area and have different needs, so despite their proximity should not be aggregated with Brighton & Hove. For the same reason, there is a need to recognise that East Grinstead is a discrete settlement and should not be aggregated with Crawley.

9.   The County Council has identified a number of minor amendments that are required to the evidence base reports that will be supplied separately. The following minor amendments are requested to the Transport Strategy before this is finalised:

- Figure 2.1: the boundary of Brighton and Hove is incorrect and should be amended;
- Paragraph 2.3: the population of Brighton and Hove is not 475000 and should be corrected;
- Figure 2.2: Worthing is omitted and should be included as a major economic hub as by population it is larger than some economic hubs that are shown;
- Figure 2.3: this figure should use text to describe the spatial distribution of the tourism, creative industries and low carbon technology industries and clearly state that these are also priority sectors; and.
- Figure 2.9: consideration should be given to showing Noise Important Areas on this map.

Highways

10.   Road safety is a persistent issue in the South East and recent data indicates that this is not improving at a satisfactory rate. This acts as a disincentive to travelling by more sustainable modes of transport. Therefore, there is a need for road safety to be identified alongside

connectivity, capacity and reliability as one of the highway challenges in paragraph 2.56.

Our Vision, Goals and Priorities

Vision

11.   No further comments.

Economic, social and/or environmental priorities

12.   The priority to improve air quality through initiatives to reduce congestion and encourage shifts to public transport should recognise the role that other modes of transport can play in improving air quality; for example walking and cycling. Also, mobility-based solutions to transport issues such as ride-sharing (e.g. Faxi) may be less polluting but may not be recognised in the traditional sense as "public transport". Therefore, we suggest the priority should be amended to; "…encourage shifts towards less polluting modes of transport."

Our Strategy

Key challenges

Journey types

13.   The identification of six key journey types and a set of key principles is generally welcomed. Although the strategy acknowledges that some journeys involve a combination of these journey types, it would be helpful if the strategy could clearly set out how this cumulative effect should inform decision-making. The Transport Strategy rightly recognises the challenges associated with the different movement types. However, in some cases, the initiatives that have been identified do not adequately reflect the scale and nature of the interventions that are required to address these challenges. The County Council consider that wherever possible, the initiatives should be specific about modes of transport and the objective of the initiative to provide a clear steer to delivery bodies. The initiatives should also not be constrained to the role of TfSE in delivering the initiatives but should set out initiatives that will be delivered by other bodies. The following sections include suggested amendments for the specified sections.

Radial journeys

14.   Radial Challenge 3 acknowledges that one of the roles of the M23/A23/Brighton Main Line Corridor is to serve the Sussex coastal towns which often require both coastal and radial journeys for access to/from London and Gatwick Airport. Some of these towns such as Bognor Regis, Littlehampton, Worthing, Shoreham and Selsey include pockets of deprivation. Journey times by rail between Bognor Regis, Littlehampton and London are very similar to journey times between Margate, Hastings and London which are highlighted as requiring journey time improvements. Therefore, we suggest that Challenge 3 should

additionally highlight the need to improve rail journey times to these towns by including the following amended initiatives;

- Improve connectivity and journey times by both road and rail to deprived communities, particularly potential 'left-behind towns' in Swale, Thanet, Hastings, Bognor Regis, Littlehampton, Worthing and Shoreham.
- Improve connectivity and journey times by road to deprived communities such as Selsey.

Orbital and coastal journeys

15. The draft Transport Strategy rightly identifies the challenges associated with the orbital and coastal journey type. However, in some cases, the initiatives to tackle these challenges are quite vague; for example, "Build a consensus on a way forward for the M27/A27/A259/East Coastway/West Coastway Corridor based on a multi-modal approach that seeks to reduce conflicts between different users on this corridor" is only a vague statement of intent.

16. Successive studies have identified that there is a need for investment in the strategic road network on the M27/A27/A259 Corridor. Although some improvements are planned as part of the Roads Investment Strategy, improvements at Chichester, Worthing and Lancing are still at the planning stage. Therefore, there is a need for the strategy to acknowledge that these initiatives are still required.

17. Slow rail journey times on the West Coastway are acknowledged in Challenge 3 but the initiatives fail to set out how this challenge should be addressed. The options for addressing the challenges of longer distance passenger journeys on this corridor will involve improvements to the rail network.

18. The introduction of holistic demand management initiatives could play a role in tackling the orbital and coastal journey challenges. However, as large parts of the South East are rural where there are few alternatives to using a car for long distance journeys, the strategy should explicitly state that demand management initiatives should only be introduced once alternative public transport options are available.

19. For these reasons, we suggest the following amended initiatives should be included;

- In the longer term, introduce holistic demand management initiatives that address congestion across the road network while avoiding displacement effects from one part of the network to another (when alternative public transport options are available).
- Road and/or rail enhancements to improve capacity and journey times on the M27/A27/A259/East Coastway/West Coastway Corridor as part of a multi modal approach that will reduce conflicts between different users on this corridor.
- Electrification of the network and/or wider use of bi-mode trains across the south east to enable more direct, longer distance services on orbital corridors such as the North Downs Line.

- Orbital rail connections between Gatwick Airport and Hampshire and Kent to enable direct access to/from Gatwick Airport, avoiding the need to travel via London.

Inter-urban journeys

20. We suggest it would be helpful if the strategy specified the type of initiatives that might help to improve bus services to cater for inter-urban journeys. These could include the introduction of bus priority measures, real-time passenger information or demand responsive services.

Local journeys

21. The challenge associated with road safety on urban corridors is identified but no initiatives are identified to tackle this challenge. Therefore, an initiative should be included that sets out how this challenge should be addressed.

International gateways and freight journeys

22. Although plans to expand Gatwick Airport are in the early stages of development and are not guaranteed to come forward, they could do so within the lifetime of the strategy but at the present time, only limited information is available about specific initiatives that will be needed. Therefore, in the absence of specific initiatives to mitigate Gatwick Airport expansion, the County Council consider that the strategy should set out an ambition for access to international gateways which matches the scale of the vision. Therefore, we consider that the strategy should state that; "the additional passenger and employee journeys arising due to airport expansion should be mitigated entirely by increasing the sustainable transport mode share through a combination of infrastructure and service improvements."

Sustainable freight

23. The transfer of freight to more sustainable modes will help to reduce the environmental impacts of economic activity. Although the draft Transport Strategy recognises the challenge of declining rail freight and limitations on scope for improvements it does not set out initiatives to address this challenge. To do this, the identification and establishment of distribution centres at appropriate locations should be added to the list of initiatives to help address freight journey challenges.

Last mile logistics

24. The volume of goods vehicles in urban areas in West Sussex contributes to environmental issues that have led to the establishment of Air Quality Management Areas (AQMAs). Out of town distribution centres for the 'last mile' delivery could help to effectively tackle this challenge. Therefore, Last Mile Logistics should be promoted extensively as an effective and sustainable solution to tackling freight and environmental issues and should be added to the list of initiatives to tackle the freight journey challenges.

Parking for commercial vehicles

25. Parking opportunities for commercial vehicles in the South East are sparsely located and are not suited to modern requirements of the industry. For example, there are lorry parks in central locations rather than close to the Strategic Road Network. This results in ad hoc parking in unsuitable locations with associated anti-social behaviour in some cases. Therefore, we consider there is a need to improve the parking opportunities for commercial vehicles, particularly be ensuring they are well located and provide facilities to suit the requirements of the freight industry. This should be added to the list of initiatives to address the freight journey challenges.

Future journeys

26. Challenge 2 for Future Journeys rightly points out that there are risks of some parts of the South East being left behind and that new mobility services may not be accessible to particular demographics. However, the issues of social exclusion are not only caused by geography or demographic characteristics. Social exclusion may also be a consequence of socio-economic factors or discrimination. Therefore, the County Council request that Challenge 2 for Future Journeys is amended to add these to the list of factors that may lead to groups in society being inadvertently excluded.

27. The adoption of new technologies has the potential to assist in tackling road safety issues. This is an opportunity for future journeys that should be identified in the strategy and considered in more detail in the Area Studies and also the Future Mobility Strategy.

Interchange facilities

28. The initiatives needed to address radial, orbital & coastal and inter-urban journeys do not include enhancements to interchange facilities; this is a significant omission that must be addressed through an amendment to the strategy. Current provision of interchange facilities to enable switching between road, rail and bus is limited due to limited capacity and the cost of parking at interchanges. In most areas, interchange facilities are also centrally located within urban areas which can lead to the practice of 'rail-heading'. In order to facilitate an increase in the use of sustainable modes of transport, there is a need to increase the capacity, availability and accessibility of interchanges, which could include the creation of new interchanges such as stations or park & ride sites. Therefore, this should be added to the list of initiatives to address the challenges associated with radial, orbital & coastal and inter-urban journeys.

Capital investment

29. All the modelled scenarios assume very significant levels of transport infrastructure capital investment. Given the lead-in times for investment of this scale and the need for phasing of both expenditure and construction activity, much of this planning would need to be started very soon in order to be implemented in full by 2050. Therefore, it is suggested that area/corridor studies should identify a programme showing

the key stages of work and the scale of the investment required in order to achieve the strategy.

Affordability

30.   The Social Goals and Social Strategic Priorities include reference to affordability of the transport network. This is also listed as a challenge for local journeys but not for other journey types. Affordability of transport network is a cross-cutting issue that applies to all journey types and initiatives to tackle affordability should be considered to tackle the challenges associated with other journey types. Therefore, we suggest this should form a part of the key principle of; 'putting users at the heart of the transport system'.

Implementation

Indicators

31.   The indicators are quite weak and unlikely to provide sufficiently useful information to make well-informed decisions. In some cases, the information is not related to the outcome that TfSE is seeking. For example, the strategic priorities include biodiversity net gain but the focus for the indicators is on reducing loss of biodiversity. This is not acceptable and should be amended, potentially though learning from good examples on other similar transport strategies such as Transport for the North.

https://transportforthenorth.com/wp-content/uploads/Independent-Integrated-Sustainability-Appraisal-Post-Adoption-Statement-min.pdf

Funding & financing

32.   Some of the funding and financing mechanisms have not previously been used in West Sussex and would require a significant change of approach to transport investment that could adversely affect finances for other (i.e. non-transport) public services. There is a need for TfSE to set out a clear rationale for the preferred funding mechanisms because, in most cases, the power to use these funding and financing mechanisms rests with the local authorities, not TfSE. They also need to ensure that affected local authorities support the use of these mechanisms on a case by case basis.

33.   The introduction of new funding and financing mechanisms should not result in additional costs to council tax payers. In line with the County Council's response to TfSE's Consultation on the Draft Proposal to Government, TfSE should conduct an impact assessment that takes account of any potential impacts on other public bodies before seeking to use new funding and financing mechanisms.

34.   In practise, some of the funding mechanisms are unlikely to be available for transport investment unless other changes are made by the Government to funding for public services. For example, building new homes places a greater burden on local authority services (non-transport) than is recovered through additional council tax income. Therefore, council tax increment retention is unlikely to be available for transport investment.

35.   Increasing costs to beneficiaries could result in unintended and undesirable consequences such as businesses choosing not to invest or relocating in response to these costs. There is also a need to build trust with beneficiaries to reduce the likelihood of conflict. Therefore, the Transport Strategy should include a key principle that the introduction of any new funding and financing mechanisms will be equitable economically, socially and environmentally.

Dependency on other policy areas

36.   The dependencies on other public policy areas such as energy generation and land-use planning, need to be more fully explored. As transport cannot be considered in isolation, there is likely to be merit in planning in parallel for other relevant public policy areas to ensure that the Transport Strategy can be implemented and will be effective. This may include for example, taking an active role in determining where the electricity (arising from the extra demand coming out of the strategy) actually comes from instead of taking a passive role and saying that this can be determined elsewhere.

Priorities for interventions

37.   The order of priorities is generally welcome and the County Council agrees that highway schemes should be lower priority in the longer term. However, highway schemes are still likely to be needed in future where this is linked to major development and to tackle road safety issues. As currently presented, figure 5.1 gives the impression that highway schemes will not be needed in the longer term and this may cause difficulty in making the case for these schemes. Therefore, we request that highway schemes to facilitate major development and improve road safety are included in figure 5.1 as a short, medium and long term priority (but lower priority in the long term).

38.   Given the challenges of providing improvements to some journey types; e.g. additional capacity for longer distance travel into Central London, the strategy should be more explicit about the opportunities that may be easier to realise such as greater investment in rail infrastructure away from routes into London to support economic uplift and a more balanced economy across the South East. Therefore, there are additional improvements that should be identified with the strategy. For example, under the "priorities for investment" section the longer term goal should include Coastway as well as Brighton Main Line improvements.

Integrated Sustainability Appraisal

39.   The County Council welcomes that sustainability principles are central to the strategy vision and strategic priorities.

40.   The use of strategic corridors as a way to present the findings of the Integrated Sustainability Appraisal (ISA) means that insufficient information is provided about the findings of the appraisal outside the strategic corridors; this needs to be addressed through an update to the ISA.

41.   The implementation of mitigation measures is essential to satisfactorily ameliorate the adverse effects of the strategy and delivering the vision and strategic priorities. In some cases, such as protected areas, these adverse effects could prevent scheme delivery and compromise delivery of the outcomes that the strategy is seeking. Therefore, it is essential that these measures are deliverable. Assessing the deliverability of mitigation measures should be a key task for corridor studies and if mitigation measures are not deliverable, then this should lead to reconsideration of the alternatives. To ensure they mitigation measures are delivered we suggest that the value for money of mitigation measures should be recognised within the Transport Strategy to help ensure that scheme budgets and business cases include the cost and benefits of mitigation measures.

Overall views

Any additional comments

42.   The County Council has separately provided comments on the technical evidence base reports. Some of these comments have not yet been addressed. Therefore, TfSE is requested to respond to these comments or explain why this has not taken place in due course.

Monitoring and evaluation

43.   Due to uncertainty about the impacts of leaving the European Union due to the range of possible outcomes from the negotiations, the Transport Strategy may need to be updated quite quickly to reflect the possible impacts.

Smart and integrated ticketing

44.   The Transport Strategy should set out how TfSE intends to address the challenges of integration between modes of transport, drawing on the evidence provided by the Smart and Integrated Ticketing Options report. The challenge associated with fares and ticketing is mentioned for the local journey type but the strategy currently fails to explain how this challenge will be addressed. The Transport Strategy should also clarify the role that TfSE is expected to play in addressing this challenge such as specific initiatives to overcome the barriers to introducing Pay As You Go, flexible ticketing options and mobility-based solutions such as ride haling. TfSE should also consider whether due to changing patterns of behaviour such as greater home working, whether these interventions could play a part in addressing the challenges associated with radial, orbital and coastal journey types as commuting is a key purpose for these journey types.