

South Coast Alliance for Transport and the Environment (SCATE)

Promoting 21st century sustainable transport solutions

Transport for the South East

Draft Transport Strategy

Response to Public Consultation

10th January, 2020

About SCATE:

The SCATE network is an organisation formed of both members of the public and independent organisations who have come together with a common purpose as set out in the objectives below.

SCATE's objectives are to:

- Promote sustainable transport solutions (for personal travel and freight)
- Seek better land use, infrastructure and transport planning to reduce the need to travel and dependence on the private car
- Oppose damaging road-building schemes along the south coast corridor
- Ensure that the environment is properly valued (for its contribution to the economy and human health) and that full consideration in particular is given to impacts on landscape, biodiversity and climate change in all decision making.

e-mail: scate.transport@gmail.com

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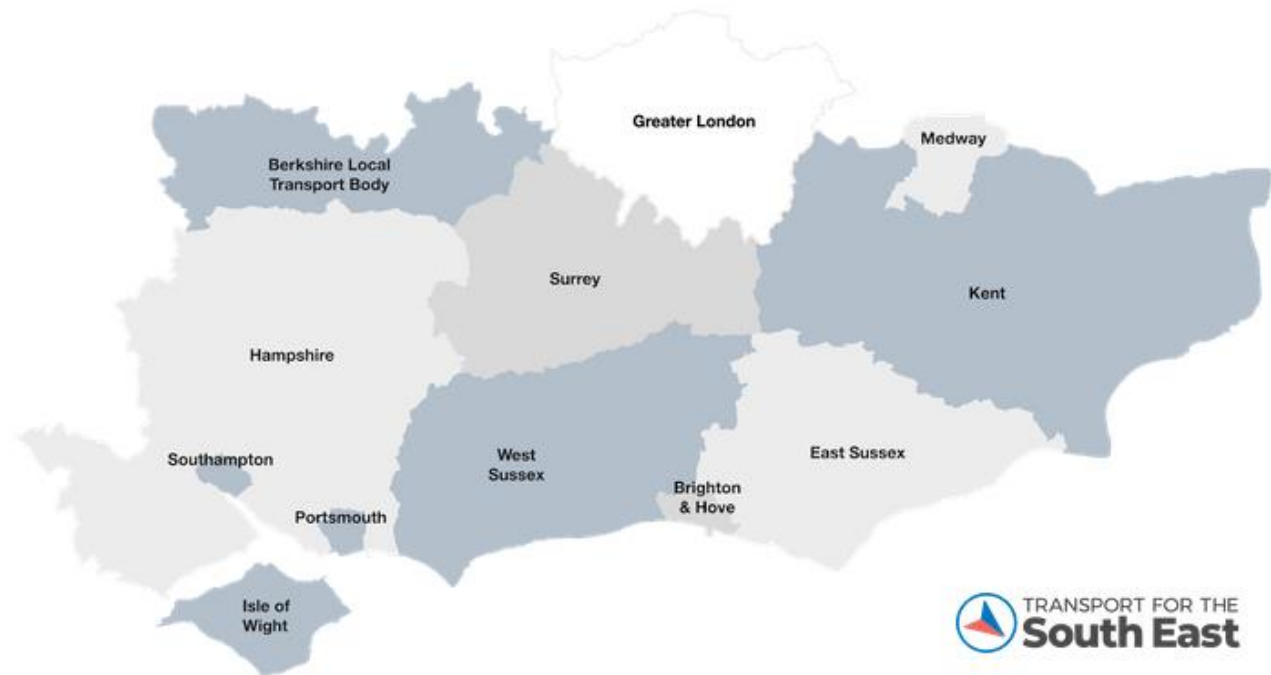


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Introduction

SCATE's main focus is on Sussex but it extends east into Kent and west into Hampshire. It has a vision for a future integrated sustainable transport system that will meet the challenges of climate change and protect the environment for all who live along the south coast counties.



Summary of the submission by the SCATE

We welcome:

- The 2050 net-zero carbon target
- The move to planning for people rather than for vehicles
- That net biodiversity gain is mentioned
- Acknowledgement that EVs won't solve the congestion problem

We have some concerns about the draft strategy:

- The lack of urgency in tackling car dependency / culture to achieve modal shift and traffic reduction – can't carry on building roads and put off change for 5 – 10 years
- A pathway to net-zero carbon before 2050 with intermediate targets is missing.
- All proposals should be assessed to show how they contribute to meeting the carbon targets
- The preferred scenario fails to prioritise traffic reduction and instead shows an 8% increase in traffic and a 13% decrease in active travel over today's levels
- Local (sustainable) connectivity, particularly active travel, should be treated as a strategic priority

- There is no mechanism proposed to 'lock in' modal shift with increased bus and rail (or active travel) provision so that the resultant road traffic reduction isn't lost over time
- The strategy has a list of major road building that will destroy biodiversity despite wanting to promote biodiversity net gain
- A greater focus on seamless integration between sustainable modes is needed
- New developments should be based on high quality mass transit and active travel networks, combined with good local service provision, not new roads
- The Integrated Sustainability Appraisal while containing some good background information is undermined by a number of unsubstantiated and incorrect assertions around health and equality. It also misses some important impacts regarding roadbuilding.

We welcome the vision

SCATE, welcomes the draft strategy's vision for the South East, namely;

"By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step-change in connectivity and environmental quality.

A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life."

The strategy must go further

Whilst we welcome the draft strategy's recognition that things have to change it doesn't go far or fast enough to meet the challenges of the 21st century. The South East transport strategy must adopt genuine sustainable transport solutions that will enable the region to meet the 2050 target within the region's carbon budget. Currently, there is no 'roadmap' or interim targets to show how the net zero 2050 target will be achieved over the next 30 years. Supporting road building in the short term will add to CO2 emissions and undermine this ambition.

We welcome the commitment to move away from the traditional approach of providing extensive highway capacity. However, the priorities for intervention set out by the draft strategy will not deliver this vision or commitment given the continued focus on road schemes, particularly in the short term. Proposals to invest in attractive public transport alternatives, develop integrated land use planning policies to reduce the need to travel, adopt emerging transport technologies, and implement more significant demand management policies are listed as 'long term' aspirations. Meanwhile local transport is sidelined and deemed mostly an irrelevance. If TfSE is serious about tackling climate change, sustainable transport interventions are needed now, not after the region's carbon budget has been consumed.

New roads are also wrongly claimed to be beneficial for younger and older people, people with disabilities and the unemployed. Many people within these groups do not have access to a car so focusing resources on new roads rather than affordable public transport, walking and cycling will exacerbate inequalities within the region.

Revised approach for a transport strategy

A 21st transport strategy should be fully integrated with planning. Together they should guide development to locations well served by sustainable transport or have the potential to be. We strongly object to the suggestion in the draft strategy that new roads should be used to 'unlock' new development as this will undermine the aims and aspirations of the strategy itself.

Redefining 'Economic Growth'

While we welcome the recognition that economic growth should not just come at any cost (sections 3.16/3.21), the use of the term 'sustainable economic growth' in this context is confusing.

'Sustainable economic growth' should consider social and environmental impacts such as:

1. Carbon footprint¹
2. How much 'natural capital' is degraded²
3. The environment³
4. Levels of pollution⁴
5. Wellbeing/Quality of life⁵
6. Safety⁶

Therefore, to talk about 'sustainable economic growth but not at any cost' seems to be a paradox as true 'sustainable economic development' would be balanced in approach.

Net Zero Carbon (Climate Change)

While we welcome the draft strategy's recognition that climate change is a priority, this strategy needs to go further and faster than it currently does if it is to address this issue properly.

The strategy must set interim targets to ensure that it remains on track to deliver on the 2050 target (which may well be further tightened) while remaining within the region's carbon budget.

More investment is needed to achieve behaviour change to help people reduce the need to travel and to achieve modal shift.

¹ Is it zero carbon neutral and if not why not?

² What effect does it have on the land, flora and fauna? What is the net biodiversity gain?

³ Does it affect a National Park, Green Belt, AONB or is green space lost?

⁴ What are the levels of pollution from the development?

⁵ Does the development improve residents' and workers' quality of life? For instance, does the development cut travel time or noise levels? See: [OECD Economic well-being](https://www.oecd.org/statistics/measuring-well-being-and-progress.htm) and <https://www.oecd.org/statistics/measuring-well-being-and-progress.htm>

⁶ Will the development help people feel and actually be safe? See: <https://www.local.gov.uk/sites/default/files/documents/community-safety-1e2.pdf>

A New Infrastructure development approach

TfSE must show the way forward with a strategy that actually guides the implementation of sustainable and low or zero carbon transport. Instead of allocating millions of pounds to new roads, funds should be diverted to rail schemes and local highway improvements which facilitate greater use of active travel and public transport.

Resilience & Risk Management

One of the Economic Priorities is listed as: 'A more resilient transport network to incidents, extreme weather and the impacts of a changing climate'. However, what this means in practice or how the network will be adapted is not really expanded upon. We only need to look at the recurring flooding in each year (including in December 2019) to see that the existing road and rail network is clearly not resilient.

Sustainable Rail Transport Links

Transport networks should seek to provide sustainable strategic links within and outside the south east area. Rail solutions which provide a good base for sustainable transport should be expanded.

Investing in the Brighton mainline (BML) with its two-track limit because of tunnels will not provide adequate transport capacity for the transport links between London and the south coast. Other rail links should be developed, such as:

- Improving services on the east and west chords via Arundel and Uckfield. The missing link between Uckfield and Lewes should be provided as a matter of strategic importance, and not reliant upon the provision of economic development, or housing.
- East-west rail links should take a much higher priority such as the electrification of the line between Ashford and Hastings.
- Improving services on the west coastway line between Brighton and Southampton should be a priority.

Measures such as these will help move journeys from road to rail and achieve a more sustainable long-term solution.

We welcome:

- A fresh voice to review stalled projects such as BML2
- The ambition to dramatically increase rail use

We have some concerns about the draft strategy:

- Doesn't refer to impact of cost of rail on modal split / behaviour change
- Doesn't mention impact of building developments not well connected by public transport
- Doesn't mention importance of seamless integration, particularly with bus and active travel, on modal shift

- Doesn't mention need to make rail trains and stations more accessible
- No targets for 'green' rail rolling stock
- No mention of chord lines and missing links and their potential to improve reliability and train times
- No strategic rail review mentioned – no consultation with rail users / campaign groups
- No mention of gauge clearance or moving freight onto rail
- Appears to look at South East in isolation (to rest of country)
- Misses importance of connecting destinations by rail
- No mention of current bad experience for people using stations – pollution, poor outdated designs, discriminatory of people with disabilities and pushchairs, etc

Road Transport

We object to the statement in the draft strategy which supports existing schemes in the Roads Investment Strategy. Currently there is a bias towards roads funding which is fuelling climate change and other inequalities. This funding needs to be refocused to achieve sustainable transport solutions for the 21st century.

The very nature of our current road infrastructure only adds to our carbon footprint and does not reduce it. Currently only 1% of the cars sold in UK are powered by electricity and even if they were 100% zero carbon, congestion would still be a huge problem.

We welcome some positive notes:

- High level statements and objectives
- Demand management
- Future mobility strategy (but not prioritised)

We have some concerns about the draft strategy:

- Not tackling car dependency culture soon enough with no focus on traffic reduction
- The large number of new roads / upgrading roads in the next 5 years
- Not enough on shared mobility as part of the solution
- Not fully addressing ecological impacts of new roads and infrastructure
- Speeds not mentioned – could provide leadership on this
- Fails to acknowledge planning failure and bad practice
- Ignores the strategic importance of local connectivity both in urban and rural contexts
- Does not recognise co-benefits of active travel and public transport
- Over claims on road co-benefits
- Fails to address equalities access issues

Bus Transport

We welcome:

- The acknowledged need for integrated ticketing
- The recognition that car use is in competition with bus services (but the TfSE document doesn't offer solutions)
- The ambitious aspiration to increase bus use

We have some concerns about the draft strategy:

- Currently cars are cheaper and more convenient - the strategy doesn't have any proposals to address this and to persuade consumers, workers, tourists & businesses to move to sustainable means of transport
- No mention of funding / franchising or National Bus Strategy
- No centralised bus network planning – lack of joined up routes – too many interchanges
- Lack of infrastructure and joined up routes – interchanges
- Timetables and frequencies
- Bus lanes not prioritised and efficiency not maximised
- Rural bus services are not properly considered

There are a whole range of things which will encourage users to take the bus, rather than the car. For example:

- Encourage government and bus companies to introduce express bus services between rail stations and towns which do not have a rail station.
- Express buses could link East and West, between the radial rail links, fanning out from London, so as to improve transportation rather than encourage people to take a long triangular journey to cross East and West, which may involve even travelling into London on already overcrowded rail routes.

The confidence of the public has reduced over the years in the bus network because of the difficulty in accessing timetable information, the perception of unreliability and in many rural areas, the complete loss of services. A major rethink on bus services is needed so that nowhere is left isolated without regular services and access to the wider public transport network. This needs to be provided alongside good information and affordable fares.

Walking and Cycling

The draft transport strategy seems to have no focus or plans to enable and deliver more walking and cycling.. Rural and urban walking and cycling should each have their own focus. Currently the draft strategy seems to only recognise urban issues.

We welcome some positive notes:

- Strategy refers to importance of walking and cycling

- Evolution of transport planning policy – but needs to happen quicker and to put ‘people and place’ above vehicles
- Alludes to benefits of reducing the need to travel
- Mentions ‘prioritisation of vulnerable users’

We have some concerns about the draft strategy:

- The failure to recognise local journeys, particularly walking and cycling as of strategic importance – they are a high percentage of all journeys
- Projected 13% fall in modal share for active travel (walking & cycling) in preferred scenario
- Lack of integration of walking, cycling and public transport
- No focus on enabling walking and cycling – no strategy of how to deliver significant uplift in active travel across the region
- Focus on new roads (short term) and highways focus generally
- Significance of vehicle domination not adequately spelt out
 - a. Mental health – well-being – physical health and activity levels
 - b. Social interaction – Donald Appleyard study
 - c. Local shopping – pedestrian and cycle pound
- Lack of focus on road safety – talks of zero target by 2050 but delivery only talks about reduction – no delivery of any reductions by mode – high risk
- Equalities issues are not properly addressed and the ISA does not help with its inaccurate Equality Impact Assessment
- No recognition that in many areas, possibly with the exception of the main cities there has been a very low level of investment in footpaths and walkways to assist people in travelling around a town or village or getting to a bus stop or village

Spatial Planning

A 21st century transport strategy should not simply support new roads for housing, or industrial development. The strategy should seek to steer development to sites with good sustainable transport links or those locations where such links can be developed. A transport strategy should be integrated with planning.

We have some concerns about the draft strategy:

- Need to redefine ‘strategic’ – local connectivity impacts wider connectivity
- Investment in modal shift rather than transport expansion
- Equalities – need to recognise all needs – especially health impacts – in prioritising
- The strategy continues to plan for vehicles. It must prioritise planning for place and people now. The lack of emphasis on walking and cycling, which appears to be dismissed as a strategic issue without any justification will undermine its aims and objectives

Multi-ticketing & Through Ticketing

We support the concept of a smartcard system. There should be every encouragement for rail, bus and governmental organisations to come together so that it is possible for a single ticket to be purchased to travel across the region (if not the country) without financial penalties or without buying a new ticket for every leg of the journey.

Shared Road Space in Towns & Villages

A new sustainable transport regime is needed in towns and cities, on non-trunk and A roads. Roads need to be safe for all users and not just be seen as the domain of cars and lorries, where everybody else has to get out of the way. Introducing 15 and 20 mph speed limits, would encourage more people to travel by scooter or bicycle (including electric powered) through the town on the road and not the pavement.

Environmental Indicator for biodiversity

Whilst the draft Strategy includes the 'Use of the principle of 'biodiversity net gain' in all transport initiatives' we note that the Environmental Indicators (table 5.1) refer to no net loss and no degradation of biodiversity and natural capital. This is not acceptable and goes against the principles of mandatory net gain. It is clear that pursuing 'no net loss' will never achieve the 'step change in environmental quality' envisioned. The indicators must be for a net gain in both biodiversity and natural capital. 'No net loss' should not be seen as an achievement.

Not covered / Needs further work:

TfSE does not have a strategy for rural transport

We are surprised that the draft strategy does not contain a section on rural transport. We note that the draft strategy addresses urban areas but there is little in the strategy about the desperate situation rural areas in the south east (especially in the National Park) face over the lack of coordinated sustainable transport. We believe it is important that the transport strategy provides guidance and leadership on this.

Transport of Freight & Goods

More work is needed on a strategy for freight transport. Transport of goods and materials covers a wide range of supplies including the import and export of goods. At one end of the scale there is the transport of heavy materials such as sand and ballast and fuel oil products. At the other end of the scale there is the transport of 'Amazon' type overnight deliveries.

Freight transport also breaks down into long distance, regional and local services. Currently we know that HGV transport is on the increase and that most goods are transported by road.

A transport strategy needs to understand which forms of transport are on the increase and which are on the decline. Can more materials be transported by rail? Can the impact of freight

transport on our road network be mitigated in any way by the introduction of transfer stations or distribution centres in regional and local areas? All of these questions and more need to be considered when developing a transport strategy for freight.

We believe the recent freight survey carried out by TfSE was a 'light-touch' exercise and needs to be supplemented by more detailed work with the freight and transport industry alongside engagement with local communities.

Air transport

There are two major international airports in the region. There is also Southampton airport which carries international traffic alongside a number of other local airports. As we know air transport is a major contributor to climate change. We realise the development of these airports is out of the scope of this regional policy but nevertheless the draft strategy should seek to influence government thinking on this critical issue. The regional transport authority should make every effort to ensure that transport to and from airports can be achieved using public transport rather than encouraging the use of cars. The authority should also seek to question the need for additional runway capacity at airports in the south-east given these will further erode the region's carbon budget and make it harder to achieve net-zero carbon.

Electric Car & Truck Charging Infrastructure

The strategy for transport should include encouragement for electric car and commercial vehicle charging. Charging stations for commercial vehicles need to be developed if we are to achieve the zero-carbon target by 2050. A long-term strategy should include support for infrastructure so that large vehicles can be supported by hydrogen or other fuel sources.

Parking

Whilst on street and off-street car parking is a matter for the local councils, the regional strategy should encourage lower charges for smaller cars which take up less road space and as an interim measure for electric vehicles.

Digital Communications

We are pleased to see that reference is made, albeit briefly to technology and innovation. We feel that this section should be expanded to consider the effects that improving telecommunications and the internet can have on reducing the need for travel. If rural digital telecommunications can be improved it will make it more possible for people to work remotely and not have to travel into an office as well as improve provision of other services at a distance. We would refer you to research such as [Unlocking the digital potential of rural areas across the UK](#) and the House of Lords paper [Time for a strategy for the rural economy](#) for further information on this subject.

Coastal sea routes for freight and passengers

The provision of railheads to encourage transport to move from road to rail and from road to sea transport needs to be considered. The one area where capacity could dramatically increase for freight transport and a limited degree of passenger transport is on our coastal waters -

from Tilbury through to Southampton. There are a number of ports, which could be utilised to implement such a strategy. A special study should be undertaken to reveal the benefits of transport between such places as:

Tilbury, Medway, Dover/Folkestone, Newhaven, Shoreham, Portsmouth and Southampton.

Many of the above have railheads for passenger and freight transport.

Currently HGVs enter the UK through places like Dover and Southampton. If the ultimate destination for these HGVs is a location to the south or south west or to the north or north-east vehicles could be transhipped by 'coastal transport' to make that journey. The opportunities for passenger services should also be explored.

Other items that should be covered in the strategy:

- E-bikes/e-scooters – these could be a real game-changer in giving people an alternative to the car but barely get a mention
- Investment in and a focus on modal shift not just transport expansion
- Address total (door-to-door) journey integration
- Guidance to planning authorities on street innovation, including school streets
- Bus de-regulation challenge
- More focus on health impacts – physical and mental
- Hospitals and schools and other big traffic generators
- Pavement parking and a better pedestrian environment
- Urban and rural lanes - 20mph default
- Environmental improvements
 - Greening
 - Healthy streets – shade, seating
- The need for separate walking and cycling facilities in urban areas