

BRIEFING NOTE



Subject: Transport for South East (TfSE) Transport Strategy
Date: 18 December 2019
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1. Introduction

This note sets out the draft response to Transport for South East (TfSE) consultation on their 30-year Transport Strategy.

2. Background

The documents on which the consultation is taking place are as follows:

- **Executive Summary:** <https://transportforthesoutheast.org.uk/wp-content/uploads/2019/10/TfSE-Draft-Transport-Strategy-Executive-Summary.pdf>
- **Full Transport Strategy:** <https://transportforthesoutheast.org.uk/wp-content/uploads/2019/10/TfSE-Draft-Transport-Strategy-v24.0.pdf>
- **Integrated sustainability appraisal** <https://transportforthesoutheast.org.uk/wp-content/uploads/2019/10/Integrated-Sustainability-Appraisal.pdf>

The Strategy was developed by TfSE working with consultants [Steer](#) and [WSP](#).

3. Method of consultation

The core consultation is being conducted through an online survey (SurveyMonkey). The online survey has been complemented by five engagement events for stakeholders across the region. Council officers and the Portfolio Holder for Economic Development attended the Brighton-based event on Wednesday 23 October.

Proposed responses to the substantive consultation questions which are set out the following section. The questions relate to the five chapters of the strategy as follows:

- **Our approach:** a proposal to adopt a 'decide and provide' approach in place of the traditional transport planning approach of 'predict and provide'
- **Our area:** a summary of the characteristics, challenges, opportunities in the South East
- **Our vision, goals, and priorities:** *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.*
- **Our strategy:** sets out key challenges and opportunities for six 'journey types' (*Radial Journeys, Orbital and Coastal Journeys, Inter-Urban Journeys, Local Journeys, International Gateway and Freight Journeys, Future Journeys*)
- **Implementation:** sets out proposed performance measures to monitor progress of the strategy

For most of the questions the consultation offers fixed multiple choice responses. However, for nine of the questions an additional narrative response can be given, and for each of these a proposed response is given below.

4. Responses to narrative questions

Chapter 1, Our approach

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

The Council supports the evidence-based approach to a Transport Strategy for the region and welcomes the opportunity to be involved in the consultation.

Consultation approach

The on-line consultation survey, and the events held across the region all represent valuable channels of engagement. Engagement through groups like the Greater Brighton Economic Board (GBEB) is welcome too. The Council welcomes the comprehensive evidence base that has been assembled. However, the Council would be keen for TfSE to do more to make that material more navigable for stakeholders. To ensure meaningful engagement with stakeholders it would be helpful to have some concise guidance to help stakeholders navigate and identify the most salient parts of the documents that make up the wider evidence base.

Evidence base

The evidence base is very comprehensive, the Council has concerns that some of the data sources chosen may not provide the most representative or useful information.

For example, the Scenario Forecasting Report suggest that currently 21 per cent of the region's 20.9 million annual trips are cycling and walking trips, with just 4 per cent of trips by rail. That appears intuitively wrong. The Council understands that these figures are the result of TfSE using a data source which counts all trips equally, so a worker's 50km rail commute would count the same as a short lunchtime walk. This brings with it a number of risks. In particular, the risk that proposals developed to respond to the region's transport challenges could be based on unsound assumptions. For example:

- rail travel proposals which the current rail network does not have the capacity to absorb
- proposals to encourage active modes of travel which do not correctly recognise the current baseline level of walking and cycling
- proposals about the design of public realm and amenities based on incorrect baseline assumptions about the current modal share.

The Council would therefore urge TfSE to revisit this work to use a more nuanced method of understanding modal travel – for example including only main journeys from home to main workplaces to give more representative results.

Wider engagement

The Council is keen that the Transport Strategy reflects other key strategic documents which are currently emerging across the region. Most importantly, the Local Industrial Strategies (LIS). Coast to Capital's (C2C) LIS is currently at consultation stage, and the Council would urge TfSE to engage with C2C's LIS consultation activities to identify synergies and areas of common alignment, and to take the same approach with the other LEP areas within the region.

Chapter 2, Our area

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

The Council agrees with the conclusion that the region is an economically and socially diverse area. Furthermore, the Council feels that it is important that the Strategy reflects the way in which the region is composed of a number of discrete functional economic areas with their own

character. The Strategy correctly identifies and describes the region's principal towns and five LEP areas, but doesn't mention other important geographies. In particular, the Greater Brighton City Region is an important entity which the strategy needs to recognise. The Greater Brighton Economic Board (GBEB) has developed a number of key strategic documents available here: <https://greaterbrighton.com/documents/>) which the Council would urge TfSE to engage with and reflect in the Transport Strategy.

The Council welcomes the inclusion of an overall economic analysis. However, some aspects of that analysis are very broad. For example, the map at figure 2.3 characterises the Mid Sussex and the Greater Brighton economies as being based on financial and professional services. Advanced engineering, medi-tech, and digital technologies are all important sectors for the District and City Region, with Creative Industries a key sector for the City Region, which should be reflected please.

Section 2.16 sets out our areas of high planned growth, but appears to exclude the Burgess Hill Strategic Growth Programme which is the largest growth programme in the sub region. The programme will deliver 5,000 new homes, create up to 15,000 jobs, and deliver infrastructure, employment space, and a 48 hectare Science and Technology Park.

The success of the Growth Programme is dependent on adequate highway infrastructure. The central gateway into the growth programme area (the A2300 corridor) is benefiting from £21m of investment to be spent by 2021. The residential sites, employment sites, and existing transport hubs across the Growth Programme are also being made better connected through a £21.8m sustainable transport scheme.

However, the Council's discussions with Highways England and West Sussex County Council indicate that further improvements at the A23/A2300 junction (particularly the slip roads but also beyond, along the A23 south) will be necessary to support the employment sites and the Science and Technology Park. The Science and Technology Park will be an employment site of regional importance supporting 2,500 jobs, along with ancillary uses including on-site hotels, restaurants, cafeterias and other amenities. The improvements will also be needed to support and the growth of Burgess Hill as a destination following the town centre regeneration which will deliver a strong cultural offer and night-time economy. The Council would therefore urge TfSE to promote investment in A23/2300 junction improvements as a priority for the Strategy.

The Council is keen also that the Strategy supports the Council's safeguarding and growth proposals and highlights instances where transport connectivity is the central constraint on growth. Proposed policy SA35 of the Council's draft Site Allocations Development Planning Document (DPD) sets out three key locations for safeguarding of land for strategic highway improvements. The first of these is the A2300 /A23 junction upgrades at Hickstead, described above. The two further locations are:

- The A264 corridor upgrades at Copthorne Hill Hotel junction
- The A22 upgrades at Felbridge (A264), Imberhorne Lane, and Lingfield junctions.

Together these upgrades are necessary to support planned growth within Mid Sussex and Tandridge and are being developed in partnership with West Sussex and Surrey County Councils. The Council would wish to see these and other examples highlighted in the strategy, and would be keen to see the Strategy advocating for greater investment to help deliver these necessary upgrades.

The Council is also keen that the Strategy places appropriate emphasis on how current and emerging technological innovation can influence commuting behaviour and support positive changes in transport infrastructure. That could include:

- infrastructure provision for electric bicycles and potentially (subject to legal status changes) electric scooters
- electric vehicle (EV) charging provision for passenger cars and, where practicable, goods vehicles
- using the opportunities created by gigabit digital connectivity to promote changes in working patterns with more remote working and a resulting reduced need for daily commuting
- best use of 5G-enabled real-time traffic information to reduce congestion for journeys that continue to be made using private vehicles
- new commercial and economic models of vehicle rental / ownership, facilitated through app-based technologies that offer potential to reduce the number of private passenger cars either operating or parked on the region's roads.

Specific comments on section 2 are set out below:

- The section on page 28 on rail transport doesn't recognise the Brighton Main Line as a key route into London (via St Pancras and London Bridge) and to Bedford and Cambridge.
- The same section similarly doesn't appear to recognise the rail line from Uckfield, passing through East Grinstead, as connecting to London stations including London Bridge and Victoria, and London St Pancras which in turn connects to routes into the East Midlands and beyond.
- The Council recognises the high levels of outward commuting. The Council's Economic Development Strategy prioritises creating more high value local jobs to reduce the need for commuting. As noted above, the Council would therefore be keen that the Strategy promotes proposals to reduce the need for travel through the planning and delivery of residential and employment space, and the Council supports the move to a 'Planning for Places' approach, which is consistent with the Council's District Plan and the National Planning Policy Framework.
- Section 2.65 – 2.66 doesn't include all of the region's airports – for example Brighton and Hove City Airport.
- The section on Integration usefully identifies a range of salient issues evident across the region, including the lack of good '*modal interchanges that support housing and development*'. The Council is keen that where examples of good practice do exist they are highlighted. The Council feels that the Burgess Hill Strategic Growth programme represents a compelling exemplar of an integrated approach to planning and place making which prioritises sustainability. The programme will deliver a diverse mix of 5,000 homes supported by employment spaces, public amenities, and community assets, connected through a new sustainable transport network in a way that makes reduces the need for longer commutes and makes active modes of travel more attractive and practical. The Programme also incorporates a £21.8m Place and Connectivity Programme (£10.9 m LGF funding + £10.9 match funding) which will deliver a range of sustainable transport schemes including cycle routes, improvements to the public realm

in key gateway locations, improved public transport interchanges to both local railway stations, which will help make it a compelling exemplar of sustainable development.

- The Council would urge TfSE to use the Burgess Hill Growth Programme as an example of how integrated, holistic, and sustainable growth can be delivered in a way that reflects the vision, goals, and priorities set out in the Strategy.

Chapter 3, Our vision, goals, and priorities

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

The Council supports the overall vision for the South East as a leading global region for net-zero carbon, sustainable economic growth. However, it may be necessary to review the proposed target date of 2050. There may be national policy pressure to achieve zero carbon well before then, so it may be helpful for the Strategy to state explicitly that target dates will be reviewed over the first five years of implementation, and may change to reflect changing national policy imperatives.

The Council welcomes TfSE's recognition that an effective transport strategy must take a holistic approach to delivering economic, social, and environmental benefits. The Council supports TfSE's approach of basing the three strategic goals on the themes of economic, social, and environmental priorities.

The Council is also keen that the Strategy takes account of, and where appropriate integrates with, other key strategic initiatives that impact the region. There are many of these initiatives across the region, and those which the Council is particularly keen to see reflected are:

- The South East Energy Strategy
- Greater Brighton Energy Plan
- The Coast to Capital Local Industrial Strategy.
- The West Sussex Transport Plan 2011-2026
- Local authorities' District Plans.

The South East Energy Strategy and Greater Brighton Energy Plan both prioritise transport innovation technologies including electric vehicles using both battery technologies and hydrogen-cell technologies.

The Council supports the 15 priorities set out in the Strategy. The Economic Priorities and the focus on reducing the need to travel in particular align with this Council's Economic Development Strategy. The Strategy's emphasis on place-making and prioritising active modes of travel in town centres also accords with the Council's approach to creating economically sustainable and vibrant town centres where residents and visitors will want to spend time (3.22 – 3.27).

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

The Council supports the high-level conceptual proposal to move away from planning for vehicles and towards planning for places, with more closely integrated land use and spatial planning policies. That approach is already established within the Council's District Plan and the

National Planning Policy Framework (NPPF), and so the Council would expect it to be reflected in the 30 Year Transport Strategy.

The Council agrees also that improving the existing physical infrastructure will be key to the future prosperity of the sub region. This section of the evidence base gives a broadly accurate description of the existing infrastructure and natural assets of the sub region.

It would be helpful for any action plan to highlight specific instances where investment is needed to meet current and future needs for capacity and resilience. For Mid Sussex, the key locations are the three safeguarded areas set out in the response to question 11 (The A2300/A23 junction, A264 corridor upgrades at Copthorne Hill Hotel junction, and The A22 upgrades at Felbridge (A264), Imberhorne Lane, and Lingfield junctions). Other key instances which the Council feel should feature as investment priorities in the Strategy are:

- The Brighton Main Line (as set out in the responses to questions 9 and 11, above, and the response to question 19, below).
- The A27 west of Brighton.

The Council feels that it is especially important that the Strategy emphasises the risks to future prosperity if adequate investment is not made as the infrastructure becomes a barrier to growth.

Chapter 4, Our strategy

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

The Council feels that that the approach taken for this section - setting challenges alongside responses – is a helpful and effective way of presenting the Strategy’s proposals. The specific responses that are offered for each of the challenges are cogent, but they lack any specific timings. The strategy would be strengthened by the addition of some indicative delivery timescales and milestones for these actions. Comments on the recommendations for each journey type are set out below.

Radial journeys

The Council recognises the point that a large number of radial journeys are driven by commuting patterns that are the result of an imbalance between housing supply and demand (4.7). However, the Council feels strongly that it is important to recognise that these commuting patterns are also the results of housing growth not being matched by growth in employment spaces. To realise the wider ambition to move to a ‘planning for place’ approach it will be essential to ensure that the Strategy supports and promotes a unified and holistic approach to place making.

The Strategy speaks of ‘fast rail links’ between London and Brighton (4.8). However, it is important to recognise that the Brighton Main Line often operates at or beyond capacity, and a lack of resilience means that minor incidents can result in closures to large sections of the line.

Whilst the section on Challenges and Opportunities (pages 69-70) cites some of the issues on the Brighton Main Line, the Council is concerned that the current narrative doesn’t fully reflect the challenges on the line or the extent to which the line could hinder future economic growth. The Council believes that investment in the Brighton Mainline will be key to ensuring the line’s future viability and key in encouraging a shift from road to rail travel.

Many of the capacity and resilience issues arise from the ‘Croydon Bottleneck’, which is well recognised by Network Rail and by key stakeholders along the Brighton Main Line corridor. The Brighton Mainline is strategically important to Mid Sussex with five of the line’s stations in the District: Balcombe, Haywards Heath, Wivelsfield, Burgess Hill and Hassocks. The Brighton

Mainline will also be critical to underpinning the success of the Burgess Hill Strategic Growth Programme (described in more detail in responses to the questions 9 and 11).

With all of that in mind the Council would urge TfSE to:

- Review the responses to last year's consultation by Network Rail on "Unlocking the Croydon Bottleneck"
- Ensure the Strategy recognises the Brighton Mainline as one of the most important strategic transport links in the region,
- Ensure the Strategy supports and lobbies for increased investment in the Brighton Mainline, in particular in improvements to unblock the 'Croydon Bottleneck',
- Support more immediate initiatives to introduce digital signalling to the Brighton Mainline.

Orbital and coastal journeys

The Council welcome's the Strategy's recognition of the particular challenges arising from the A27 and recognises the characterisations of this as "*a significant barrier to fostering sustainable growth*".

However, the proposed response to '*Build a consensus on a way forward based on a multimodal approach*' lacks ambition and detail. A more developed response with more tangible outcomes would be welcome.

Inter-urban journeys

Improving junctions between the major road network and main local trunk roads will be key to support economic growth in a number of areas across the District. The three safeguarded areas mentioned in question 11 (A23/A2300 junction, the 264 Copthorne Hotel Junction, and the A22 Felbridge, Imberhorne Lane and Lingfield Road Junctions) will all require improvements to support planned growth and to support the viability of the employment sites including the Science and Technology Park.

Ensuring good transport connectivity (including affordable public transport) for rural areas will be essential to ensure that pockets of rural deprivation are addressed and to ensuring that all parts of the region can benefit from future growth. The Council would welcome a stronger emphasis in the Strategy on improving rural connectivity.

Local journeys

The Strategy mentions some of the social challenges around rural transport, including the risk of communities and individuals becoming marginalised if transport policies and technologies are not implemented in an inclusive way. However, in its current form the Strategy doesn't provide a compelling response to all of the potential social challenges. The Council would therefore be keen to see greater priority given to developing responses to social inclusion and mobility challenges, and more emphasis on how technological innovation can help address those issues.

In identifying solutions for local journeys, the Council would welcome stronger representation of local voices. In particular, acknowledgement of, and support for, the potential for local community-led and parish-led transport schemes to tackle issues around local transport provision.

The Council supports the proposals to prioritise the needs of pedestrians and cyclists over the private car, and the Council's work in regenerating Burgess Hill and in the Haywards Heath masterplan reflects those principles. The Council also supports further investment in accessibility to public transport services, and would highlight Wivelsfield Station on the Brighton

Main line as an example where accessibility improvements to the northbound side of the station are urgently needed.

The Council and partners will work to achieve these objectives through significant investment in infrastructure across the development. This investment will include £24.12 million for on-site transport and highways and £14.7 million for off-site, which has been committed in the infrastructure development plan (IDP).

International gateways and freight journeys

The Council would welcome more emphasis on improving surface transport to and from Gatwick Airport, building on the existing plans for improving the Brighton Main Line.

Plans to expand Gatwick Airport are in the early stages of development, meaning that specific initiatives to mitigate the impact on surface traffic of any expansion have not yet been developed. However, the Council is keen that the Strategy sets out as part of its vision a commitment to ensuring that any increases in demand for surface transport are met through sustainable means. The Council is therefore keen that the strategy promotes an approach in which the additional passenger and employee journeys arising from any airport expansion are delivered through sustainable modes. The Council would wish to see the Strategy promoting investment in rail and other sustainable transport infrastructure to support travel to and from the airport, as well as encouraging service improvements using the existing infrastructure.

Towns located on the main transport corridors to Gatwick benefit from comparatively good transport connectivity, for example those towns on the Brighton Main Line. However, for those not close to the main radial routes (for example, East Grinstead) connectivity is notably worse. The Council would welcome more emphasis in the Strategy on how orbital and radial routes can be enhanced to improve connectivity to the airport for those towns, and to emphasise the economic benefits of improving that connectivity.

Future journeys

The Council recognises the gaps in the region's digital infrastructure which the Strategy describes. However, it is important to recognise also those areas where significant progress is taking place. For example, over the coming two years a full fibre gigabit network will be established in Mid Sussex and across many other parts of the sub region.

21. Do you have any additional comments on the journey types which form part of our draft Strategy, including any of the initiatives we have identified for each of the journey types? *Please provide details below, making clear where applicable which initiative(s) you are referring to.*

Please see comments in previous sections.

Chapter 5, Implementation

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

Overall, the Council feels that the 'Implementation' chapter of the Strategy would benefit from strengthening.

It would be helpful for the strategy to be complemented by a more developed, phased implementation schedule with a clearer articulation of how the proposals will be funded. It would be useful for the Strategy to set out more about how the potential funding bodies (Highways England, Network Rail, Local authorities, Local Enterprise Partnerships and others) might work together to deliver those outcomes.

The current draft features a number of 'indicators' for each one of the 15 Strategic Priorities. However, these indicators lack any specificity, and are not 'SMART' measures.

The Council would welcome a much more developed implementation chapter with ambitious but credible objectives supported by SMART measures where possible. The Council recognises that it may not be feasible to set detailed indicators at this time, but would be keen to see the Strategy committing to developing an implementation plan and setting a forward schedule for developing SMART measures to support the plan.

Integrated Sustainability Appraisal

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

The Integrated Sustainability Appraisal is a very substantial document with almost 600 pages including all of the appendices. With that in mind the Council would welcome an executive summary - which would also make engagement with the document by other stakeholders more likely.

- The Council is keen that all protected sites and designated landscapes are correctly reflected in the assessment, including the High Weald Area of Outstanding Natural Beauty and the South Downs National Park
- The Council is also keen that key sites in the historic environment are reflected, including the conservation areas within Mid Sussex
- The assessment needs also to ensure that the extent to which region is a water stressed area is correctly reflected, which is not currently evident in the section on the water environment (4.3.15 - 4.3.17)
- The key table which sets out the sensitivity assessment of the strategic corridors (table 5.2) is difficult to interpret in its current form. The Council would welcome this presented in a different form or with a clearer guide to navigating and interpreting the table as part of an executive summary.

Overall Views

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

Overall, the Council feels that the Strategy is based on a comprehensive and well-triangulated evidence base. The Council recognises and broadly agrees with the key issues that the Strategy has identified.

The Council also supports the overall vision and high level strategic goals of the Strategy, and welcomes the focus on economic, social, and environmental objectives as part of a unified approach to future transport.

The Council in particular supports the central proposal to move from vehicle-based approach to planning to a people-based approach. As noted in the preceding sections, the Burgess Hill Strategic Growth Programme stands as a compelling example of how holistic planning and development of residential and employment sites can embed transport sustainability, promote modal shift, and reduce the need for vehicular travel.

There are a number of methodological details where the Council does have concerns, detailed in the preceding sections. The most notable of these is about the way that 'trips' have been counted in the Strategy's evidence base. As set out in the response to question 9, the Council is concerned that the methodology used has given rise to a very misleading picture of current modal patterns of travel that should be addressed.

Most significantly, the Council feels that the Strategy's 'Implementation' chapter is currently its weakest part. It does not provide a response that matches the scale and scope of the challenges set out in the rest of the document.

5. Further information and contact details

For any further information or to discuss any of the matters touched on in this briefing please contact:

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