

# Draft Transport Strategy: consultation questionnaire

## Have your say

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## About you

Q1. Are you providing your own response or responding on behalf of an organisation/group? Please select one of the options below.

Responding on behalf of organisation/group (Please respond to **Questions 3 and 4**)

Q3. If you are responding on behalf of an organisation or group, please provide the following details.

**Organisation name** Thames Gateway Kent Partnership

**Your name** [Details provided]

**Your role** [Details provided]

Q4. Which category of organisation or group are you representing? Please select all the boxes that apply.

Local Government (includes county councils, district councils, parish and town councils and local partnerships)

Other (please specify):  
TGKP is a public-private partnership

Q5. Please confirm that you have read the draft Transport Strategy before completing this questionnaire? Please select as appropriate.

I have read the full [draft Transport Strategy](#)

## Our Approach

Q6. Rather than the traditional transport planning approach of ‘predict and provide’ based on responding to trends and forecasts, we have adopted a ‘decide and provide’ approach to identify a preferred future for the South East in 2050. Please see Paragraphs 1.16 to 1.20 of the draft Transport Strategy for further information. To what extent do you agree or disagree with the use of this ‘decide and provide’ approach? Please select one option.

Strongly agree

Q7. The draft Transport Strategy advocates the evolution of transport policy away from one based on ‘planning for vehicles’ to one based on ‘planning for people’ and ‘planning for places’. Please see Paragraphs 1.21 to 1.25, and Figure 1.3, of the draft Transport Strategy for further information. To what extent do you agree or disagree that transport policy across the South East should evolve in this way? Please select one option.

Strongly agree

Q8. In Paragraphs 1.26 to 1.30 of the draft Transport Strategy, we explain our preferred future scenario: ‘Sustainable Route to Growth’. How important do you feel the key features of our ‘Sustainable Route to Growth’ scenario are for the future of the South East? Please select one option for each feature.

	Very important	Fairly important	Neither important / unimportant	Fairly unimportant	Not important at all	Don't know
The South East is less reliant on London and has developed its own successful economic hubs		X				
The benefits of emerging technology are being harnessed	X					
Land-use and transport planning are better integrated	X					
A shift away from private cars towards more sustainable travel modes	X					
Targeted demand management measures, with more mobility being consumed on a ‘pay as you go basis’		X				
The transport system delivers a cleaner, safer environment	X					

<p>Q9. Do you have any additional comments about our approach to developing the draft Transport Strategy? Please describe these below.</p>
<p>We strongly support the aspiration to move from a ‘predict and provide’ to a ‘decide and provide’ approach and the ‘sustainable route to growth’ chosen scenario and welcome the focus on people and place.</p> <p>Although Kent &amp; Medway is polycentric, with no dominant city and with complex travel to work and travel to learn patterns, the importance of London to this area in socio-economic terms cannot be under-estimated. Developing our own economic hubs and being less reliant on London is a shared long-term ambition, but that needs to come through strengthening the credentials of places and changing rather than weakening the relationship with London. There remain short- and medium-term pressures on the networks serving connectivity with London that should be priorities for infrastructure investment, and will themselves support place-shaping in the longer term.</p> <p>The Strategy places strong emphasis on the desirability of integrating land-use and transport planning, but does not set out any detailed thinking about how that might best be achieved and at what level. This will need an honest and open dialogue and collaboration, particularly in two-tier areas.</p>

**Our Area**

<p>Q10. Chapter 2 of the draft Transport Strategy summarises the characteristics, challenges and opportunities in the South East. To what extent do you agree or disagree that the evidence set out in Chapter 2 of the draft Transport Strategy makes a strong case for continued investment in the South East’s transport system? Please select one option.</p>
<p>Tend to agree</p>

<p>Q11. 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. Please describe these below.</p>
<p>We broadly endorse the analysis of the South East area. Perhaps as a consequence of its geographic boundary, TfSE seems to have given limited attention to the Thames Estuary as a reality connecting places along the North Kent coast, with South Essex and with London. The potential of the river is not really therefore considered and we suggest this would merit more detailed exploration, particularly with regard to movement of freight and passengers into an out of the Capital. We suggest that TfSE should conduct an area study on the Thames Estuary in collaboration with Transport East and Transport for London and should explore possibility of a formal role for the new Thames Estuary Growth Board in that process.</p> <p>The Lower Thames Crossing is rightly identified as a critical intervention and we wholly endorse the Strategy’s identification of early delivery as crucial not only for the Kent &amp; Medway economy but for the UK as a whole. The Crossing will also re-shape future travel patterns within the Thames Estuary area and this could also be explored in an area study looking at the Thames Estuary.</p> <p>One dimension currently given insufficient attention is the visitor economy and how transport networks, travel patterns and behaviours both affect and are affected by leisure journeys. This may particularly affect coastal communities and be subject to seasonal pressures, but it clearly contributes to the overall quantum of journeys and network pressures. Leisure travel also particularly impacts the Channel Ports (including the Channel Tunnel), airports and associated corridors in peak holiday seasons (both into/out of the UK and ‘staycation’ travel). The Strategy could do more to identify the particular characteristics of leisure travel, how these differ from travel to work patterns and movement of goods, and ways to influence more sustainable travel options and choices in the visitor economy.</p> <p>The approach within the Strategy to consider the relationship with London and the rest of the UK is welcome. A more nuanced analysis of the relationship with London would be helpful and might justify an additional thematic study. The Strategy notes the differences, for example, between travel patterns into Central London (83% by rail) and into Outer London (80% by car). For the latter, it would be helpful to understand more about the purpose of these journeys and what proportion of these involve travel to a single place of work compared with, for example,</p>

Q11. 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. Please describe these below.

light goods vehicles (vans) travelling between multiple destinations to deliver goods and services. This will help understanding of the scope to influence change (e.g. modal shift) and targeting of interventions (e.g. alternative fuels and smart deliveries). This is particularly relevant to SMEs across North Kent (and the South East more generally) providing technical, professional and skilled trades into the Greater London economy.

## Our Vision, Goals and Priorities

Q12. Our vision is that: '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 give our residents and visitors the highest quality of life.' To what extent do you support or oppose our vision for the South East? Please select one option.

Strongly support

Q13. Do you have any further comments on our vision? Please provide these below.

It is hard to express anything other than strong support for the vision and supporting goals and priorities set out in the Strategy. However, whilst this indicates strong endorsement this may not particularly help decision-makers in discerning the relative weight that should be given to any priorities.

The Strategy could offer more exploration – or explanation – of the drivers for behavioural change, what influences decision-making in situations of choice and how to respond in situations where choice is constrained.

Q14. The draft Transport Strategy sets out three strategic goals that underpin our vision. These goals will help to translate the vision into more targeted and tangible actions. Please see Paragraphs 3.3 to 3.7 for more details on our vision and goals. To what extent do you agree or disagree with the goals set out within the draft Transport Strategy? Please select one option for each goal.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
<b>Improve productivity and attract investment to grow our economy and better compete in the global marketplace</b>		X				
<b>Improve health, safety, wellbeing, quality of life, and access to opportunities for everyone</b>	X					
<b>Protect and enhance the South East's unique natural, built and historic environment, and tackle climate change together</b>	X					

Q15. Under each of the three goals, we set out a number of specific economic, social and environmental priorities. Further information on these priorities can be found in Paragraphs 3.8 to 3.10 of the draft Transport Strategy. To what extent do you agree or disagree that these are priorities which the Transport Strategy should aim to achieve? Please select one option for each row.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Better connectivity between our major economic hubs, international gateways and their markets	X					
More reliable journeys between the South East's major economic hubs and international gateways	X					
A more resilient transport network to incidents, extreme weather and the impacts of a changing climate	X					
Helping our partners meet future housing, employment and regeneration needs sustainably	X					
Use of digital technology to manage transport demand, encourage shared and efficient use of transport	X					
A network that promotes active travel and active lifestyles	X					
Improved air quality through initiatives to reduce congestion and encourage shifts to public transport	X					
An affordable, accessible transport network for all that promotes social inclusion and reduces barriers	X					
A seamless, integrated transport network with passengers at its heart	X					
A safely planned, delivered and operated transport network	X					
A reduction in carbon emissions to net zero by 2050	X					
A reduction in the need to travel, particularly by private car	X					
A transport network that protects and enhances our natural, built and historic environments	X					
Use of the principle of 'biodiversity net gain' in all transport initiatives			X			
Minimisation of transport's consumption of resources and energy	X					

Q16. Are there any other economic, social and/or environmental priorities which you feel the Transport Strategy should aim to achieve? Please describe these below.

TfSE has done some interesting work on the future of travel. It is clear that some broader investments – e.g. in the energy infrastructure – will be required to support any future transport options, but particularly a shift towards more electric vehicles. It would be helpful to take stock of the interplay between different options such as mobility as a service and autonomous vehicles on the one hand, and EV charging infrastructure on the other. Introducing planning requirements such as EV charging capability in new dwellings could perhaps be redundant or not cost-effective in a future scenario geared more to mobility as a service.

We would also like to see much more attention – though this is a national and international issue rather than confined to TfSE – to improving the sustainability of HGVs. We support the general proposition to try to overcome the barriers that currently constrain shifting more freight from road to rail. But HGVs are likely to remain a significant component of vehicle movements on Kent & Medway’s roads, particularly the main corridors connecting to the Channel Ports, container ports and logistics and distribution networks which have a strong presence in North Kent. HGVs inflict exponentially more damage to the highways infrastructure compared to cars, and unless viable alternative fuel systems are embedded across the HGV fleet they will remain more polluting because of reliance on diesel fuel. We would like to see the Strategy go further therefore in advancing proposals for the future of freight that will incentivise research and implementation of more sustainable solutions.

We support the commitment to the principle of ‘biodiversity net gain’ but have some concern that in more challenging situations the mitigations and enhancements benefits designed to deliver net gain may be delivered outside the zone actually affected by the scheme. This commitment could therefore be strengthened by seeking to ensure that net gain benefits are delivered wherever feasible within the impact zone of a transport scheme.

Q17. The draft Transport Strategy sets out a number of principles that are used to identify the key transport issues and opportunities in the South East (see Paragraphs 3.11 to 3.38 of the draft Transport Strategy for more information). To what extent do you support or oppose these principles? Please tick one box for each principle.

	<b>Strongly support</b>	<b>Tend to support</b>	<b>Neither support / oppose</b>	<b>Tend to oppose</b>	<b>Strongly oppose</b>	<b>Don't know</b>
<b>Supporting sustainable economic growth, but not at any cost</b>	X					
<b>Achieving environmental sustainability</b>	X					
<b>Planning for successful places</b>	X					
<b>Putting the user at the heart of the transport system</b>	X					
<b>Planning regionally for the short, medium and long-term</b>	X					

## Our Strategy

Q18. Six key journey types are identified within Chapter 4 of the draft Transport Strategy. We identify the key challenges and opportunities for each of the six journey types, and indicate the types of schemes and policy responses that will be needed to address these challenges. Subsequent area studies will be used to identify comprehensive packages of initiatives. We are not seeking detailed feedback on individual schemes at this stage, but we want to make sure we have identified the key challenges and the broad types of responses that will be needed for each of the movement types. To what extent do you agree or disagree that the key challenges relating to each of the journey types have been correctly identified? Please select one option for each journey type.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Radial journeys		X				
Orbital and coastal journeys		X				
Inter-urban journeys		X				
Local journeys		X				
International gateways and freight journeys		X				
Future journeys		X				

Q19. 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. Please specify which movement type(s) your comments relate to

The typology of journeys is helpful as a framework for understanding how existing and possible future infrastructure might support particular travel movements, but it does not perhaps fully capture the underlying purpose of journeys as distinct from their origins and destinations. As noted above (Q11), the analysis and strategy appears to give only limited attention to leisure journeys and the visitor economy more generally. These journeys will differ from those made for commuting purposes, employment, learning or accessing local services. We suggest that the implications of visitor/leisure travel should receive more explicit attention.

A significant issue for both road and rail networks is peak capacity. Aside from interventions needed in the short- to medium-term to increase peak rail capacity, particularly on North Kent lines and HS1, there is untapped potential for reverse commuting and levelling the difference in service patterns between peak and off-peak to realise the full potential of rail assets. The Strategy could perhaps consider how to incentivise demand for different usage patterns that optimise the use of available capacity. We would also like to see TfSE add its voice to calls for investment in new rail rolling stock, particularly on HS1, to be brought forward to enable longer trains and ease peak capacity pressures.

Q20. To what extent do you agree or disagree with the initiatives we have outlined to address the challenges that have been identified for each journey type? Please select one option for each journey type.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Radial journeys	X					
Orbital and coastal journeys	X					
Inter-urban journeys	X					

Q20. To what extent do you agree or disagree with the initiatives we have outlined to address the challenges that have been identified for each journey type? Please select one option for each journey type.

<b>Local journeys</b>	X					
<b>International gateways and freight journeys</b>	X					
<b>Future journeys</b>		X				

Q21. 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.

**General comments:**

In the sections on radial and orbital journeys, we welcome and endorse the references to the importance of the Lower Thames Crossing and the potential extension of Crossrail from Abbey Wood to Ebbsfleet. Without wishing to pre-empt the outcomes of the government-funded study on connectivity between Abbey Wood and Ebbsfleet, in which TGKP is a partner, we nonetheless welcome TfSE’s suggestion that an intervention on this scale is needed to support growth and address constraints on the existing rail network, in particular the well-documented capacity constraints at London termini serving the North Kent lines. Similarly, we welcome TfSE’s recognition of the potential for extending passenger services onto the Grain freight line to help unlock new growth and support modal shift to more sustainable travel patterns within Medway.

On future journeys, a major challenge – systemic rather than restricted to TfSE – will be managing the long transition process from current to emerging and future technologies. Targets such as banning sales of new petrol and diesel-engined cars will have direct impact and drive consumer choices ahead of their introduction. However, the stock of fossil-fuel and hybrid vehicles is such that the replacement rate based on normal vehicle life expectancy will mean an implementation ‘tail’ of many years’ duration (unless innovations emerge e.g. for cost-effective conversion or replacement of fossil fuel by non-fossil fuel propulsion units). Prematurely shortening vehicles’ operational ‘life’ would carry economic and environmental costs that could outweigh the benefits of change for an extended period. TfSE, working with its counterpart STBs, national government and industry could potentially assist in bringing forward both technical solutions and appropriate policy frameworks.

The Strategy highlights the challenge of affordability in relation to Local journeys by public transport, but affordability of public transport is a wider issue at every level of journey type. We suggest that TfSE should consider this further as a thematic issue across the Strategy and its implementation.

**Detailed comments:**

Radial Journeys – Amplifying our responses to Q20 we agree the value of investing in rail improvements between Abbey Wood and Ebbsfleet and opening up passenger services on the Grain freight line. These have the potential, through improved connectivity, to support growth, prosperity and productivity uplift extending across Kent and Medway well beyond the geographic extent of the physical interventions themselves.

Orbital and coastal journeys – we endorse the importance of the Lower Thames Crossing to relieve pressure on the M25 in west and north Kent and to open new strategic pathways between the Channel Ports and the Midlands and North of England. These assets are of national economic significance. There might be scope for improved orbital rail connectivity to relieve pressure on radial routes, for instance journeys to Gatwick Airport and other assets to the west of Kent & Medway, reducing the need to travel into London and out again.

Inter-urban journeys – The M2 Junction 5/A249 interchange is a road safety hotspot and whilst Highways England has proposed an improvement scheme there remains a funding gap. We urge that this should be a priority for TfSE lobbying for investment. The improvement is desperately needed to improve safety, reduce congestion and delay, improve air quality and unlock development potential in and around Sittingbourne.

Local journeys – there is an issue across many parts of Kent & Medway where it seems ‘last mile’ journeys are actually more like last 3-5 miles, with people driving to and parking at or near railway stations (such as Ebbsfleet International) rather than having a quality local public transport service they can rely on or are prepared to use. This links to the issue of poor public transport connectivity in more rural areas and the limitations of de-regulated

Q21. 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.

services. This topic requires more investigation to develop specific proposals about connecting dispersed settlements more effectively to transport hubs to make modal shift a more achievable goal.

**International Gateways** – We endorse the attention drawn to the need for the Lower Thames Crossing to be complemented by investments elsewhere on the M2, A2 and M20 corridors, and the linkages between them such as the A229 and A249. These need to be scheduled on a similar timescale to delivery of the Crossing, subject to managing effectively the disruption arising from construction works, in order that the weakness and lack of resilience at the Dartford Crossing is not transferred elsewhere on the network between the M25 and the Channel Ports.

A number of constraints on the freight network, affecting Kent and Medway, are within the Transport for London area rather than TfSE. It will be important for TfL and TfSE to make common cause in working with other stakeholders such as Network Rail and landowners to develop solutions to overcome these constraints.

**Future Journeys** – the Strategy rightly highlights the challenges of looking ahead 30 years given the pace of technological change. The chief focus should therefore be on enabling measures such as energy and digital infrastructure which are likely to be essential to support any future innovation or evolutionary developments in transport technology.

## Implementation

Q22. In Chapter 5 of the draft Transport Strategy, a number of performance indicators are set out that will be used to monitor progress of the Strategy. To what extent do you agree or disagree with these performance indicators? Please select one option for each performance indicator group.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
<b>Economic performance indicators</b>		X				
<b>Social performance indicators</b>		X				
<b>Environmental performance indicators</b>		X				

Q23. Chapter 5 of the draft Transport Strategy also sets out how the Strategy will be implemented, including Transport for the South East's role and future funding challenges. Do you have any comments about the implementation of the Strategy including the performance indicators, our role and/or future funding challenges? Please describe these below.

We broadly support the range of performance indicators proposed. Without detracting from challenging targets such as net zero carbon, and endorsing the principle that growth must be sustainable, it is also important that necessary new growth is not unduly constrained by the legacy of past, less sustainable development. 'Retro-fitting' and behavioural change in existing communities can be more significant in the scale of their impact than future-proofing new development. It might be helpful if selected key performance indicators could help track change in the 'stock' of existing communities as well as the 'flow' of new development.

In the social indicators, the fourth priority refers to a seamless integrated transport network with the indicator "increase in the number of cross-modal interchanges and/or ticketing options". We would suggest two points for further consideration. The first is about accessibility, particularly for people with restricted physical mobility. This may be partially captured by the preceding indicator linked to the indices of multiple deprivation; but is important

Q23. Chapter 5 of the draft Transport Strategy also sets out how the Strategy will be implemented, including Transport for the South East’s role and future funding challenges. Do you have any comments about the implementation of the Strategy including the performance indicators, our role and/or future funding challenges? Please describe these below.

that cross-mode interchange hubs work for all users, for instance by provide step-free and wheelchair-accessible movement between modes. The second is about the impact of interchange penalties on journey times. We support TfSE’s ambitions for better integrated public transport systems. To incentivise significant modal shift away from private car use, multi-modal interchanges need to minimise walking distance between access points as well as better-integrated timetables to reduce wait times and smart ticketing. The current indicator set does not suggest a measure that really captures the benefits of better-designed interchanges on journey times and journey reliability.

TGKP is very interested in the future funding and financing aspects of the Strategy: this is particularly pertinent to the C2E (Connectivity to Ebbsfleet) Study in which we are a partner. We would be keen to explore this topic further with TfSE as both the Study and TfSE’s work programme progress.

One of the implications of a shift from a ‘predict and provide’ to ‘decide and provide’ approach may be in the appraisal and assessment framework that is needed to evaluate interventions. Existing government assessment methodologies (e.g. Department for Transport, MHCLG and HM Treasury) may not fit with this approach: traditional approaches to the assessment of transport projects tend to focus on the benefits of a project in reducing journey time and congestion based on historic and forecast trends. Working in tandem with other STBs, we suggest TfSE should engage with national government and its agencies to develop revised methodologies that provide a better framework for assessing projects in line with the approach advocated in the Strategy.

## Integrated Sustainability Appraisal

Q24. To what extent do you agree or disagree that the Integrated Sustainability Appraisal represents a thorough assessment of the draft Transport Strategy? Please select one option only.

Neither agree nor disagree

Q25. Do you have any additional comments regarding the Integrated Sustainability Appraisal? Please describe these below.

The approach seems fairly comprehensive. It provides a common framework for multi-faceted or multi-disciplinary appraisal and offers factual findings relating to different domains. It is not clear, though, how far this assists in arriving at conclusions about the relative strength or value of different elements or how the policy- or decision-maker is to determine the trade-offs between competing priorities.

## Overall views

Q26. To what extent do you agree or disagree that the draft Transport Strategy provides the mechanism that will enable Transport for the South East to achieve our mission of growing the South East’s economy by delivering a safe, sustainable and integrated transport system that makes the region more productive and competitive, improves the quality of life for all residents and protects and enhances its natural and built environment? Please select one option only.

Strongly agree

Q27. 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? Please describe these below.

TGKP strongly supports the overall Strategy advance by TfSE. Transport corridors by their nature cross both physical and administrative boundaries. It therefore makes sense to set strategy on matters of regional significance at the regional level, as well as provide a consensual framework for more local decision-making and interventions to align with the overall regional ambitions. We also strongly endorse the ambition to move from a planning for vehicles approach to planning for people and places.

We welcome the approach taken in developing the strategy, and commitments in the strategy itself, that the powers and functions sought by TfSE will be operated concurrently and with the consent of the constituent authorities, as well as shaped by engagement with business, local communities and the general public.

For areas like the Thames Estuary which straddle the jurisdiction of TfSE, Transport East and Transport for London, cross-boundary collaboration and strategic consistency will be crucial. TGKP would be keen to engage in the future areas studies and suggests that the Thames Estuary should be considered in its own right in this programme of work, involving the new Thames Estuary Growth Board formally as part of that process.

The draft Strategy reiterates TfSE's view of the importance of integrated land-use and transport planning, but does not explain what is seen as the right mechanisms or spatial scale to achieve this. It would be helpful if the final version of the Strategy and outline of future work programmes could provide greater clarity on this.

Submitted by TGKP on 9 January 2020