

TRANSPORT FOR THE SOUTH EAST – DRAFT TRANSPORT STRATEGY

The Confederation of Passenger Transport UK response to the Consultation

The Confederation of Passenger Transport UK is the trade association of the bus and coach industry, representing over 1000 operators including large bus and coach companies and numerous SME companies

CPT recognises the importance of the role TfSE can have in helping deliver a safe, integrated and sustainable transport system for the region, and welcome the opportunity to respond to this consultation

I can confirm that I have read the full draft transport strategy. I have highlighted the question numbers that are being answered.

Our response will highlight the following:

- TfSE should not be involved directly in the procurement or delivery of transport services, and therefore CPT cannot agree that the authority should seek powers to secure the provision of bus services
- Operators and local transport authorities have already been proactive introducing their own integrated smart digital ticketing schemes in their local areas, and TfSE should properly engage with operators to ensure that they build on those that already exist rather than developing or imposing a standalone scheme
- The goal to be net carbon neutral by 2050 is unambitious and this date should be brought forward

Approach

6. CPT can strongly agree that TfSE should follow a ‘decide and provide’ approach towards longer term transport planning. A sustainable transport system will not result from following a policy of continuing to build and add road capacity. However there must be a degree of flexibility within this approach to ensure unexpected changes to transport preferences can be accommodated within the plans.

7. CPT can again strongly agree with transport policy evolving in such a way that the needs of ‘people’ and ‘places’ are prioritised over ‘vehicles’

8. It will be important for a sustainable route to growth in the region for the South East to be less reliant on London and develop its own successful economic hubs, and it will also be important that emerging technologies are utilised as and when they can be shown to provide benefits to the strategy. CPT believe that it is very important that land-use and transport planning are better integrated, and it is also very important that the strategy encourages a modal shift away from private cars towards more sustainable travel options such as public transport. It is also very important that the transport system delivers a cleaner, safer environment for everyone. CPT believes that targeted demand management measures, with mobility being consumed on a 'pay as you go' basis is an aspiration that is a less important part of the strategy, and must be planned to work alongside existing ticketing arrangements.

The Area

10. It is obvious that the South East is a significant and important region due to the economic activity generated here, and gross value added to the UK economy. CPT strongly agrees that the draft transport strategy document has made a robust and strong case for continued investment in the transport system in order that the region can maintain the current activity and also generate further sustainable economic growth, whilst also ensuring the equally important social and environmental challenges of the region are given appropriate consideration.

11. However we believe that the Strategy document over emphasises the difficulties operators have coordinating timetables and ticketing, and there are many examples where working in partnership with local transport authorities many of these issues can be overcome. The strategy document also makes no mention of Open Data, which will revolutionise the access to up to date information about routes, timetables and fares for bus passengers in 2020 and will only improve integration between modes.

Vision, Goals and Priorities

12. CPT can support the overall strategic vision. However an argument can be made that in light of the declaration of a climate emergency by the Government and also by a number of local authorities many of which are located in the South East, the vision should be more ambitious and the 2050 date brought forward.

14. CPT can agree with the first strategic goal, but will add that there is a limit to the improvements in productivity that can be achieved through better transport alone. CPT strongly agrees with the second strategic goal and adds that access to high quality public transport is essential to improve the quality of life and wellbeing for the most deprived members of society. We also strongly agree with the third strategic goal, but also reiterate that a more ambitious time frame should be set.

15. CPT will strongly agree with most of the fifteen specific strategic economic, social and environmental priorities. However the priority to reduce carbon emissions to net zero by 2050 is unambitious and CPT cannot agree with that date as a priority. We would point to the recently released CPT Bus Strategy “Moving Forward Together” and the commitment made by operators to only purchase next generation ultra-low or zero emissions buses from 2023 in major urban areas, and from 2025 elsewhere.

CPT also has reservations about the priority to reduce the need to travel. While reducing the need to travel by private car is a priority that CPT can fully support, reducing the overall need to travel will certainly have negative implications for many members of society and also likely a negative economic impact and we cannot agree that this should be a priority.

17. CPT strongly agrees that the main focus of TfSE must be to ensure that the transport strategy supports sustainable economic growth, and that therefore this is adopted as a priority. We also agree that while prioritising sustainable economic growth in the region the authority must also consider the social and especially environmental consequences that will result from that growth, and plan accordingly. We also agree that any regional transport plan must involve short, medium and longer term goals and work alongside the aims of other bodies that can influence transport outcomes to ensure the overall strategy will be achieved. The needs of users must be considered, but users may have a preference for the continued use of private cars and this should not be encouraged, even in the short term. The key priority for a sub-national transport body must be to encourage integration between modes, especially making modal shift easy and simple for users to contemplate. Building confidence in people that the transport system can meet their transport needs and is resilient should also be a priority.

CPT strongly agrees that the priority of TfSE must be achieving high levels of environmental sustainability in all time frames, and this priority will fit alongside properly planning for successful places where people can live and work with the highest quality of life possible.

Strategy

18 & 20. CPT agrees that the key challenges relating to the journey types have been identified in the strategy.

The main radial corridors are well established, but must be maintained and in certain areas improved so that the whole region can benefit. CPT agrees that parts of North & East Kent are poorly served currently, especially by rail. We also agree that the other main corridors identified A21, A23/M23, A3/M3 and associated rail lines must be further developed and upgraded where necessary. Development of these corridors should also include provision and priority for inter-urban public transport journeys to ensure reliable journey times and overall resilience and to encourage modal shift. These provisions

should also include safe and secure stopping places for buses and coaches. The A4/M4/GWR corridor has already been upgraded and CPT does not believe this corridor has the same needs as the others mentioned, although any future expansion of Heathrow will impact the decision making process.

Within the South East there is limited provision for orbital journeys, and we believe that improving these journeys will pose a bigger challenge.

CPT believes that the strategy underestimates the challenge faced by the M25 Southwest Quadrant, which already operates at full capacity and where there is little or no scope to expand capacity. It should be considered unlikely that the Lower Thames Crossing can have anything other than a minor impact on the capacity constraints in this area. The challenge can be addressed to some degree by creating a new link between the M4 in the Reading area and the M3, and also upgrading the orbital rail links via Gatwick between Reading and Ashford. Ultimately the solution to this challenge will only be found through demand management, and promoting modal shift. As with radial journeys the provision of facilities such as park and ride sites and other safe and secure stopping places for buses and coaches, along with priority measures will help promote this shift to public transport.

CPT agrees that priority orbital routes should bypass urban areas, but it is also very important that orbital public transport routes should be incentivised and measures put in place to ensure these journeys are not disrupted.

CPT strongly agrees with the initiatives in the strategy to address the challenges identified for inter-urban journeys. We believe that schemes to improve the road network should always where necessary include measures to support and enhance public transport delivery. We also urge that inter-urban rail connectivity must work together with other forms of public transport and should be planned accordingly. TfSE will have a role to play in bringing operators and other stakeholders together to facilitate this.

CPT agrees with the challenges identified for local journeys. We strongly agree that funding for social and economically necessary rural bus services should be increased, and welcome that TfSE have identified this as a priority and the role that the STB can have in lobbying for this funding for the region cannot be underestimated. The CPT Bus Strategy also includes the commitment to work with public sector partners to develop and trial rural bus plans so that customers in rural locations are better connected.

CPT believes that many current local journey challenges can be addressed by improving bus priority and reducing congestion, and we agree that considering Bus Rapid Transit corridors where local authorities and bus operators can make a business case is an important initiative. CPT also agrees that improving integration between transport modes is essential, and that TfSE has a strategic role to play in achieving this.

CPT agrees that the strategy identifies the main challenges involving freight and international gateway traffic. We strongly agree that TfSE must develop a Freight Strategy and Action plan to improve the efficiency of freight journeys as these journey types have the most scope to disrupt and adversely affect other transport initiatives.

CPT agrees that identifying challenges and initiatives relating to “Future” journeys is fundamentally difficult, and therefore a degree of flexibility must be included in the strategy. CPT strongly agrees that incorporating ‘Mobility as a Service’ into the overall strategy is an important aspiration. However we believe that smart ticketing and pay as you go payments are very much a current initiative and local bus operators working in partnership with local transport authorities are already making these payment methods available and are currently moving beyond smart cards using phone and app based technological solutions. It should also be noted that SolentGo is a multi-operator, multi-modal smart ticketing product already in use within the TfSE area.

Already a large majority of local buses operating in the UK accept contactless payments, and the work to develop a joined up back office system is underway. The CPT Bus Strategy also includes a commitment to introduce contactless, multi-operator tickets by 2022 in major urban areas and so we would urge TfSE to work in partnership with operators when considering ticketing initiatives.

CPT believes that the focus of TfSE should not be in developing a pan-regional smart card system, but that the focus should be ensuring that those payment systems already in use or in development can work together to deliver the aspiration for MaaS throughout the UK and not only within this region.

Implementation

22. CPT agrees that the strategy contains the necessary performance indicators to monitor progress. It should be noted that Bus Open Data will include a huge amount of information about traffic flows and journey reliability across large parts of the road network, as will the individual bus operators which should be used to monitor how this part of the strategy is progressing.

24. CPT strongly agrees that the Integrated Sustainability Appraisal is a thorough assessment of the strategy.

26. CPT agrees that the strategy provides the mechanism to enable TfSE to grow 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.

TfSE's Role (Powers & Functions)

CPT strongly disagrees that a Sub-National Transport Authority should have the duty to secure the provision of bus services, as these powers are already devolved to local authorities through the Bus Services Act 2017. Ideally TfSE should be a facilitator not a delivery body for services.

CPT also does not agree that TfSE should have the powers to establish Clean Air Zones, as these powers are already held by local authorities who are able to act jointly if required to establish a zone covering a larger area.

In summary CPT strongly supports the establishment of a statutory Sub-National Transport Body for the South East of England, and strongly agrees that planning for people and places should be at the core of the Transport Strategy.

CPT believes that the primary role of TfSE should be to provide strategic planning and leadership for the region and to provide support for local plans and initiatives.

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