

Transport for the South East - Strategic Investment Plan: Draft Consultation Response from Brighton & Hove City Council, 12th September 2022

Section 2: Investment Priorities

Which of the above investment priorities do you feel are important for the SIP to deliver? (Tick all that apply)

- Decarbonisation & Environment ✓
- Adapting to a New Normal ✓
- Levelling Up Left Behind Communities ✓
- Regeneration and Growth ✓
- World Class Urban Transit System ✓
- East - West Connectivity ✓
- Resilient Radial Corridors ✓
- Global Gateways and Freight ✓

Do you have any further comments on the SIP's investment priorities? Please limit your response to 250 words.

The SIP does not reflect the need for urgent action to respond to the Council's most pressing issue - the climate emergency, which we declared in 2018. The Council is addressing this locally but none of the eight categories explicitly mention this. The 'adapting to a new normal' priority should emphasise the need for a significant reduction in car use and a major increase in active travel/public transport. The emerging work on a new LTP for the city supports a switch to EVs, building on our successful on-street charging point programme. However, EVs are only part of the solution to reducing carbon; they will provide positive impacts for localised air pollution but continued vehicle use will not reduce road danger, congestion or depletion of nature, and continue to present demands for power.

The Council has adopted a Carbon Neutral Programme to deliver its commitment to become carbon neutral by 2030, and therefore prioritises the first SIP priority. Although all investment priorities are supported, they lack detail so only certain aspects of them can be fully supported, and some are more relevant to Brighton & Hove.

More prominence must be given to reducing traffic in the investment priorities in order to reduce road danger. A world class urban transport system is therefore supported and needed, which makes people feel safe using active travel and public transport, and that interconnects all communities.

To align with the Council's priorities within its emerging LTP, the investment priorities should focus more on reducing the need to own a private vehicle and have a much greater emphasis on active travel and public transport.

The focus on new road building and a lack of emphasis on increasing active travel (including as part of a longer journey) is a significant concern.

Section 3: Packages of Interventions

For the purposes of data gathering and analysis, the TfSE region has been split into four geographies. Which of the following geographic areas are you most interested in? Please be aware that some local authority areas appear in more than one of the geographies and you may need to select more than one of the geographies if this is the case for your specific area of interest. Choose all that apply.

- Solent and Sussex Coast (Hampshire, Southampton, Portsmouth, Littlehampton, Worthing, Brighton, Isle of Wight) ✓
- London - Sussex Coast (Chichester to Eastbourne, Surrey, West Sussex and East Sussex excluding the Hasting Area) ✓
- Wessex Thames (Berkshire, Hampshire and Surrey)
- Kent, Medway and East Sussex (Kent, Medway, Hasting and Rother areas of East Sussex)

Only if you answered Solent and Sussex Coast:

To what extent do you agree that the packages of interventions for the Solent and Sussex Coast area will deliver on the priorities of the SIP?

- Definitely agree
- Somewhat agree ✓
- Neither agree nor disagree
- Somewhat disagree
- Definitely disagree
- I'm not sure

Please select all of the packages for the Solent & Sussex Coast area that you feel are important in achieving the priorities of the SIP. Tick all that apply.

- South Hampshire Rail (Core)
- South Hampshire Rail (Enhanced)
- South Hampshire Mass Transit
- Isle of Wight (two Packages)
- Sussex Coast Rail ✓
- Sussex Coast Mass Transit ✓
- Sussex Coast Active Travel ✓
- Solent and Sussex Coast Highways ✓

Do you have any further comments on the Packages of Interventions for the Solent and Sussex Coast area? Please limit your response to 250 words.

This package does not consider the magnitude of the climate emergency and the need for rapid transition to active and public transport systems throughout the region. The attention to detail on active travel measures is less developed than on highway interventions. A comprehensive set of active travel and public transport (including A259 rapid transit) interventions are included in the Council's LCWIP and BSIP.

The Council supports strategic highway improvements that include reallocation of roadspace to active/sustainable travel and/or improve safety on the network, and reduce conflicts between local and longer distance traffic, such as online A27 junction enhancements in Brighton & Hove. These are measures that support the Council's City Plan. However, there are major concerns that some of the more significant, proposed highway improvement schemes (e.g. new road construction and capacity improvements) will increase traffic levels around the city, and affect local transport initiatives and other priorities for the city. These schemes could also have a detrimental impact on the South Downs National Park.

The Active Travel package should be stronger; improving this in all urban areas (including links to public transport options) will reduce the demand for private vehicle trips on the strategic highway network, and therefore will remove the need for some highway capacity improvements. The A259 is a priority strategic route in the Council's LCWIP, and the SIP should include NCN2 and all other strategic cycle routes as interventions. Reference to smaller, local mobility hubs to improve sustainable travel options should also be included.

There is a contradiction between section 2.9 on highways referring to 'modest improvements to the SRN' rather than 'materially lifting capacity' and the capacity enhancements referred to in some highway interventions (e.g. 19).

The approach to active travel in the London-Sussex section is considered more effective.

Only if you answered London - Sussex Coast:

To what extent do you agree that the packages of interventions for the London - Sussex Coast area will deliver on the priorities of the SIP?

- Definitely agree
- **Somewhat agree ✓**
- Neither agree nor disagree
- Somewhat disagree
- Definitely disagree
- I'm not sure

Please select all the packages for the London - Sussex Coast area that you feel are important in achieving the priorities of the SIP. Tick all that apply

- **London - Sussex Coast Rail (2 Packages) ✓**
- **London - Sussex Coast Mass Transit ✓**
- **London - Sussex Coast Active Travel ✓**
- **London - Sussex Coast Highways ✓**

Do you have any further comments on the Packages of Interventions for the London - Sussex Coast area? Please limit your response to 250 words

A comprehensive set of active travel and public transport interventions are included in the Council's Local Walking and Cycling Infrastructure Plan and Bus Service Improvement Plan.

The Council supports strategic highway improvements that include reallocation of roadspace to active/sustainable travel and/or improve safety on the network, and reduce conflicts between local and longer distance traffic, such as online A27 junction enhancements in Brighton & Hove. These are measures that support the Council's City Plan. However, there are major concerns that some of the more significant, proposed highway improvement schemes (e.g. new road construction and capacity improvements) proposed for the A23/M23 Corridor will increase traffic levels around the city, and affect local transport initiatives and other priorities for the city. These schemes could also have a detrimental impact on the South Downs National Park.

The Active Travel package should be stronger; improving and enabling active travel in all urban areas (including links to public transport options) will reduce the demand for private vehicle trips on the strategic highway network, and therefore will remove the need for some highway capacity improvements. The SIP should include strategic NCN cycle routes

as interventions, and also include reference to smaller, local mobility hubs to improve sustainable travel options.

Only if you answered Wessex Thames:

To what extent do you agree that the packages of interventions for the Wessex Thames area will deliver on the priorities of the SIP?

- Definitely agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Definitely disagree
- I'm not sure

Please select all of the packages for the Wessex Thames area that you feel are important in achieving the priorities of the SIP. Tick all that apply.

- Wessex Thames Rail
- Wessex Thames Mass Transit & Active Travel
- Wessex Thames Highways

Do you have any further comments on the Packages of Interventions for the Wessex Thames area? Please limit your response to 250 words.

Only if you answered Kent, Medway and East Sussex:

To what extent do you agree that the packages of interventions for the Kent, Medway and East Sussex area will deliver on the priorities of the SIP?

- Definitely agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Definitely disagree
- I'm not sure

Please select all of the packages for the Kent, Medway and East Sussex area that you feel are important in achieving the priorities of the SIP. Tick all that apply.

- Kent, Medway, and East Sussex Classic Rail
- Kent, Medway, and East Sussex High Speed Rail (two Packages)
- Kent, Medway, and East Sussex Mass Transit
- Kent, Medway, and East Sussex Active Travel
- Lower Thames Crossing
- Kent, Medway, and East Sussex Highways

Do you have any further comments on the Packages of Interventions for the Kent, Medway and East Sussex area? Please limit your response to 250 words.

Global Policy Package of Interventions

Which of the above Global Policy Interventions do you feel are important for the SIP to support? (Tick all that apply)

- Decarbonisation ✓
- Public Transport Fares ✓
- New Mobility ✓
- Road User Charging ✓
- Virtual Access ✓
- Integration ✓

Do you have any further comments on the SIP's Global Policy Interventions? Please limit your response to 250 words.

Within the Global policy interventions, decarbonisation should focus much more on the climate emergency and reducing the need to travel, increasing active travel and public transport use to ensure that the majority of journeys are made by these modes. The SIP places a heavy reliance on the adoption of electric vehicles, which will provide positive impacts for localised air pollution but continued vehicle use will not reduce road danger, congestion or depletion of nature, and continue to present demands for power. EVs also have a significant carbon footprint, including embedded carbon.

The phrase “new mobility” (1.3) needs to be made stronger, as the topic is an important point and needs expanding. The principle of national road user charging (1.4) is welcomed and within the broader context of charging, emphasis should also be given to encourage local authorities to investigate a workplace parking levy in their areas.

The Council fully supports measures to address the climate emergency and address public transport fares, in partnership with local bus operators. It has adopted a Carbon Neutral Programme to deliver its commitment to become carbon neutral by 2030, and the Bus Service Improvement Plan includes a number of actions to deliver lower flat rate fares, lower single fares and lower daily price capping in the city.

The remaining packages broadly align with the approved priority areas for the emerging Local Transport Plan for the city.

While the delivery of the SIP places a high expectation on the delivery of the global interventions, there are several that the Council and other local authorities have little or no control over and therefore this places reliance on others to deliver them.

Other regions in the UK have an Active Travel Commissioner. This should be an ambition for the South East as it will help in the delivery of a comprehensive active travel network and a move away from the emphasis on road building.

Section 4: Benefits and Costs

Do you think that the SIP captures the benefits and costs of the proposed packages of interventions adequately? Choose any one option.

- Yes
- **No ✓**
- I'm not sure

Please explain your answer to the above question here. Please limit your response to 250 words.

The environmental, social and financial implications have not been made explicit enough in the analysis. As previously stated, there is a need for much greater emphasis on active travel and public transport.

Section 5: Delivery of the SIP

To what extent do you agree that, as a whole, the packages of interventions will deliver on the priorities of the SIP?

- Definitely agree
- Somewhat agree
- **Neither agree nor disagree ✓**
- Somewhat disagree
- Definitely disagree
- I'm not sure

Section 6: Integrated Sustainability Appraisal and Conclusion

Do you have any comments on the Integrated Sustainability Appraisal?

The ISA approach and outputs are considered to be commensurate with the high level, proposed interventions. However, given the necessary emphasis on the need to address the climate emergency, the Council would have preferred a net zero target of 2030 to have been assessed, rather than 2050.

Overall, to what extent do you agree that the SIP makes the best case possible for investing in transport infrastructure in the South East?

- Definitely agree
- Somewhat agree
- **Neither agree nor disagree ✓**
- Somewhat disagree
- Definitely disagree
- I'm not sure