

**Matter 3 / Government Office for the South East of
England (7447)**

Draft RSS for The South East of England -The South East Plan
Examination in Public - November 2006 to March 2007
Written Statement on behalf of HM Government - October 2006

1. The current Regional Transport Strategy for the South East was published in July 2004 as part of the government's Regional Planning Guidance for the South East (RPG9). Section D4 of the draft South East Plan, the Communications and Transport Section, is intended to supersede the July 2004 RTS.
2. Since finalising the 2004 RTS a number of policy and related developments have been made public which have a material impact on the Regional Transport Strategy, some of which are subsequent to the publication of the draft South East Plan. The most significant of these are:
 - The Future of Air Transport White Paper,
 - The Future of Rail White Paper,
 - Review of UK Ports Policy Discussion Document,
 - Traffic Management Act 2004
 - PPS11, Regional Spatial Strategies, Dec 05.
 - South East Regional Economic Strategy,
 - Clarification statements of the Government's line on congestion charging,
 - Local Transport Plan 2 and Accessibility Planning guidance, and
 - Regional Funding Allocations.
3. Most recently (July 06) the Department for Transport published "Regional Spatial Strategies: Guide to Producing Regional Transport Strategies" which sets out current transport policy context for this spatial strategy.
4. The DfT intends to publish two of the three Regional Planning Assessments for the railway (RPAs) covering the South East shortly. These are: South Eastern (covering South East London, Kent and Hastings) and Southern (covering South West London, Surrey, Sussex and Hants). It is intended that the Thames Valley RPA (covering West London, Berks, Bucks and Oxon) be completed and published by spring 2007. The RPAs set out the Government's approach to responding to the demands placed on the railway by the regional spatial strategies and forecast change to 2026.
5. Government policy to address congestion and deliver wider transport objectives is built around three central themes of sustained investment, improvement in transport planning, and planning ahead by leading the

debate on road pricing and working with stakeholders to establish how and when pricing might provide the reliability and standards road users want.

6. The better alignment of transport and planning, in part through Regional Spatial Strategies, is very much part of government's national strategy for transport, as is the introduction of long term indicative regional funding allocations for transport, housing and economic development.
7. Over recent years the south east has experienced significant increases in government funding for transport. Details of this and other government expenditure are set out under Section 1 D Infrastructure and demand management.

3.1 How well does the RTS reflect and complement the proposed regional strategy?

8. Little change has been made to the 2004 Regional Transport Strategy. In its core spatial element, the development of hubs and spokes, there is a strong, mutually supportive and positive link between transport policies and planned development. Proposals to amend the particular hubs chosen for development are minor and could be considered as part of sub-regional discussions. The inclusion of High Wycombe as a regional hub is the change to Map T2 which would most benefit from scrutiny.
9. The spatial relationship between new housing, development and transport interventions outside the regional hubs is less obviously well aligned.
10. Development opportunities afforded by spare capacity in road and rail networks are not fully recognised in the SEP. Neither are the limitations to development caused by congestion which is can not readily be ameliorated.
11. The additional traffic generated by additional housing and development on the road network, though generally small in comparison to existing and background growth, causes particular problems in specific locations, most noticeably on heavily congested routes which are difficult to improve.
12. The Roger Tym report: "Augmenting the Evidence Base" notes that the trunk roads serving the East Kent/Ashford sub region and A5 at Milton Keynes remained below capacity at very high levels of new housing, and, whereas road widening in East Kent/Ashford, Milton Keynes and Aylesbury Vale, Central Oxford, Kent Thames Gateway, South Hampshire and the Western Corridor would not automatically be constrained by sites of international or national environmental importance, in the Sussex Coastal and London Fringe there would almost certainly be conflicts with such constraints. Road transport

congestion problems are forecast to be severe on parts of most strategic road routes in the South East, and this will be the case with any credible range of numbers for new dwellings over the plan period. However, locating new housing in locations currently experiencing high levels of in-commuting; where a better alignment of jobs and housing can be delivered; or where transport networks are least stressed would reduce the transport impact of new development and improve the prospects for delivering that development. It is not apparent that a rigorous approach to examination of such locations has been used to inform the spatial distribution of the SEP (the South East Plan (SEP)).

13. Road transport congestion problems are forecast to be severe on parts of most strategic road routes in the South East, and this will be the case with any credible range of numbers for new dwellings over the plan period. However, locating new housing where in-commuting is greatest, where a better alignment of jobs and housing can be delivered, or where transport networks are least stressed would reduce the transport impact of new development and improve the prospects for delivering that development. It is not apparent that a rigorous approach to this is behind the spatial distributions of the SEP.
14. The transport strategy and policies within the transport and communications chapter of the SEP which are likely to be most effective at reducing impact are those which focus development at hubs connected by public transport spokes, together with the mobility management measures of policy T5.
15. In determining the scale and distribution of new development measures to reduce, manage, and invest in transport should be considered, in this sequence, as a unique recipe for each sub-region. This is particularly appropriate when considering the transport requirements for New Growth Points.
16. There is minimal change in congestion on the rail network when comparing the mid range housing levels considered in the Roger Tym report with the figures in the SEP. The Draft Implementation Plan proposes a number of rail schemes that are not likely to be justified as value for money under any normal circumstance, and therefore cannot be considered deliverable in a Plan period where there are likely to be many competing demands for funding.
17. The Implementation Plan cannot make new commits on behalf of Government and will need to be drafted in line with the indicative Regional Funding Allocation and reasonable expectations of other funding streams.
18. The SEP is clear about the importance of delivering infrastructure in support of growth, and we agree that growth related infrastructure is required and that the relationship between growth and infrastructure is a key issue. However we remain concerned that the approach used in is over simplistic and in some cases appears to treat the provision of

new infrastructure as a direct and proportional result or requirement of growth. We consider the relationship to be more complicated and interdependent, with both variations in the supply and demand for infrastructure potentially influencing patterns of growth.

3.2 Should RTS include a more spatially specific policy on demand management in general, or road user charging in particular, having regard to the potential for raising new sources of revenue for transport schemes (Policy T6)?

1. Given the forecasts of increasing congestion on the roads and to a lesser extent rail networks, the RTS should be clear about its response at a regional level. It is unhelpful that the RTS does not identify the scale or location of congestion problems and possible solutions.
2. Government is clear that road building cannot on its own cannot address the very substantial and widespread congestion problems facing users of the strategic and local road network. Road pricing is probable within the RSS timescale but its impact is uncertain and cannot be assumed to either reduce absolute traffic levels or deal with specific hot spots. A clear direction has been set towards addressing road congestion. The RTS should respond to that either in support – being clear about how and where demand management will address problems – or set out alternative measures to address the regions congestion problems. In either case specificity about the type of demand management measures that would be appropriate in the different sub-regional or more local areas would provide direction to the Local Authorities and others responsible for delivering such measures. In this context is it relevant to record that Reading UA have bid for Transport Innovation Fund (congestion) pump priming money. This is not to imply that demand management is unnecessary where not specifically mentioned, or indeed that it is not an appropriate tool to apply to both existing and new development, though in general first priority should be in areas exhibiting highest network stress.
3. Some representations to the Panel suggest that measures such as the mobility management interventions set out in Policy T5, now often described as smarter measures, would substantially reduce the need for new infrastructure. Recent Highways Agency commission work came to broad conclusions are that a reduction of around 15% of the predicted traffic generation could be achieved by travel plans and other soft measures and that this is in line with experience generally. However, the level of reduction that could be achieved is very much dependent on location and the availability of alternative travel options e.g. public transport or links to public transport for part of the journey.

3.3 Does the Plan give enough emphasis to freight, logistics and distribution (Policies T10-T13)? Should there be greater specificity on the location of inter-modal freight interchanges (Policy T13)?

1. The Guide to Producing Regional Transport Strategies identifies the location of inter-modal freight interchanges and the provision of lorry parking and driver rest areas as a key issue for a Regional Transport Strategy. No locations for either are identified in the RTS.
2. The former SRA's Strategic Rail Freight Interchange Policy (March 2004) set out the view that three or four new strategic inter-modal rail freight interchanges were required in the wider South East at locations where key road and rail radials intersect with the M25, and that regional planning and transport policy must set the policy context for the guidance of local level policies for strategic rail freight interchanges. This view is broadly endorsed by the Government. The Government supports the joint work proposed by the Regional Assembly in Policy T13 to identify suitable locations within the region. This work might usefully cover London and the East of England in a single study, involving TfL/GLA and EERA as appropriate, as well as Network Rail and rail industry partners more widely.
3. As currently drafted policies T11, T12 and T13 lack specificity in these respects and should be revised according in the light of the further work referred to in the SEP. The views of Network Rail and the Highways Agency are particularly relevant in determining route priorities.

3.4 Does the strategy provide an adequate framework for the development of ports bearing in mind the current Government review of ports policy (Policy T8)?

1. The Regional Transport Strategy should provide a strategic steer on the future development of ports and related infrastructure needs in conformity with national ports policy. This is achieved by naming specific ports which should feature in development and transport plan policies and proposals for landside infrastructure. The Implementation Plan includes interventions specifically related to many of these ports.
2. Current government aims for ports are to promote:
 - UK and regional competitiveness;
 - High national agreed safety standards; and
 - The best environmental practice.
3. A review of ports policy was initiated in May 2006 with the publication of the discussion document "Ports Policy – Your Views Invited". The new policy statement produced as a result of this review will provide the policy context for subsequent RSS and RTS revisions.

4. Policy T10 of the draft RTS is the same as that in the current RTS as far as the list of named ports is concerned, with the inclusion of the Short Sea Services policy to the same locations.

3.5 Should the draft RTS have reflected to a greater extent the provisions of the Air Transport White Paper, particularly at Gatwick (Policy T9)?

1. The Air Transport White Paper is not adequately taken account of in the S E Plan and, as a minimum the RSS should ensure as far as possible that land needed for a second runway at Gatwick is not built on, to be reviewed following decisions on a third runway for Heathrow.
2. PPG 11 is clear that the Regional Transport Strategy should set out how national transport policies and programmes will be delivered in the region, and should provide a strategic steer on the future development of airports and ports in the regions consistent with national policy.
3. The Air Transport White Paper provides a national context for the development of airport capacity over the next 30 years. It promotes Airport Master Plans for major airports, including Gatwick and Southampton, in the south east, and supports further development of Heathrow including a further new runway and additional terminal capacity (after a new runway at Stansted), but only if stringent environmental limits can be met. A programme of work and consultation was announced in the White Paper to examine this issue and consider how best use can be made of the existing Heathrow Airport. In the case that conditions attached to a third Heathrow runway cannot be met the White Paper states that since there is a strong case on its own merits for a new wide-spaced runway at Gatwick after 2019, land should be safeguarded for this.
4. This was set out in the 2004 South East Regional Transport Strategy and should be retained.
5. The work referred to on Heathrow will not be completed before the start of the Examination in Public and consequently specific policies on a potential new runway and associated development at Heathrow, which is physically outside the south east regional, are not necessary.
6. However, Gatwick is within the south east, and draft Policy T9 should be amended to ensure that development does not take place on land needed for a new wide spaced runway after 2019.
7. In addition the RTS should take account of airport operator master plans produced in consultation with local interests and in line with government policy set out in the Air Transport White Paper. A policy to this effect should be reintroduced within policy T9.