

# Draft proposal to government

## Consultation questionnaire

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### Background

Transport for the South East was formed in 2017 as a partnership of 16 local transport authorities and five local enterprise partnerships to speak with one voice on the South East's strategic transport needs.

Our aim is to become a statutory sub-national transport body (STB), giving the South East a formal and unified voice with which to influence government decision making on transport issues.

We are now consulting on our draft proposal to government, which sets out the statutory powers and responsibilities we are seeking to help us deliver economic growth, improve quality of life and protect and enhance the environment.

The draft proposal has been developed in conjunction with our member authorities and agreed by our organisation's principal decision making forum, the Transport for the South East shadow partnership board.

## Responding to the consultation

Before answering the questions below, please read the draft proposal document which can be found at:

<https://transportforthesoutheast.gov.uk/about/becoming-a-statutory-body>

Some questions require only a 'yes/no' answer which can be selected from a drop-down menu, while others provide the opportunity to give a more detailed response.

Once you have answered the questions and completed the 'Your information' section, please send this completed form by email to [tfse@eastsussex.gov.uk](mailto:tfse@eastsussex.gov.uk) or by post to:

Transport for the South East  
County Hall  
St Anne's Crescent  
Lewes  
BN7 1UE

Please note that we are only able to process responses which include completed personal information. Your contact details will not be added to our database unless you actively opt in.

**The deadline for responses is Wednesday, 31 July 2019.**

## Next steps

After the consultation period has ended, we will consider all the responses received and amend our proposal document accordingly.

The intention is that this amended version will be put before Transport for the South East's Shadow Partnership Board in September 2019, with the proposal being formally submitted to government by the end of the year.

Government will consider the proposal and will make a decision on whether TfSE should be granted statutory status. If the proposal is agreed, a statutory instrument will be laid before Parliament for the final decision.

## Consultation questions

Transport for the South East is looking to establish a statutory sub-national transport body (STB) for the South East of England. This would give the South East a formal and unified voice with which to influence government decision making on transport issues. The prime functions for an STB would be to publish a regional transport strategy and provide advice to the Secretary of State for Transport on investment opportunities across the area.

- 1. Do you, in principle, support the establishment of a sub-national transport body for the South East, including the ability to publish a transport strategy and advise central government on transport matters in the region?**

Yes

- 2. What do you regard as the benefits Transport for the South East will provide as a statutory sub-national transport body?**

CPRE Sussex supports the ***principle*** of a statutory sub-national transport board (STB) for the South East. Integration of transport projects across modes is essential and we agree that many transport solutions are best considered at a regional scale. The current planning regime, with development and infrastructure generally considered at a district-wide scale, lacks coherence and often causes conflict. We believe that the STB creates significant transformational opportunities such as innovative approaches to investment – e.g. greater integration between land use and transport planning could reduce car-dependancy and help direct private sector investment from developers where it is most needed.

However, in order to realise these opportunities, the STB must give equal priority to enhancing the natural environment and improving social cohesion and health, alongside increasing economic growth. For example, the ‘Economic Connectivity Review’ was the shadow STB’s first major project and seems to have largely informed the emerging transport strategy, whilst the sustainability appraisal has a much lower profile. There is implicit support for expansion of aviation and new road-based infrastructure without the balanced support of meeting the UK’s climate change targets. We do not think the shared vision goes far enough (para 2.2 of the consultation document) and would prefer;

- Protects and enhances all aspects of the South East’s unique natural and historic environment, especially with respect to protected areas and human health and wellbeing, delivers net zero greenhouse gas emissions by 2050 and enables adaptation to climate change.

The ‘quick guide’ included with the consultation documents explains how the transport strategy will ‘identify how we can grow the economy of the South East by an additional 50% to £500bn and create almost 3m additional jobs by 2050.’ We look forward to seeing equivalent targets relating to the natural environment, health and well-being within the final strategy.

Transport for the South East’s draft proposal includes a list of constituent members and a number of co-opted members. Primary legislation sets out what bodies can be considered as ‘constituent authorities’.

**3. Do you, in principle, think your relevant local transport authority should be a member of the Transport for the South East sub-national transport body? If not, why?**

Yes

As a countryside charity, we would like assurances that designated landscapes will continue to be represented on the Partnership Board through co-opted membership. In addition to this, we would like greater representation on the Partnership Board in relation to the natural environment, for example by inclusion of the Local Nature Partnership. We would like district/borough councils to have greater powers within the STB so there is greater transparency/democratic accountability. It is not clear who currently sits on the Transport Forum and the minutes of the meetings of this group do not appear to be on the TfSE website. Our experience is that proactive engagement with a wide range of stakeholders, in an open and accessible process, produces better outcomes.

Beyond general functions of an STB, Transport for the South East is planning to make a proposal to the Department for Transport (DfT) for other transport functions which would be exercised concurrently and with the consent of the Secretary of State or local transport authorities, e.g. in relation to constructing new highways. Any proposal to DfT would need formal consent from each 'constituent member' and any regulations would also need formal consent from all 'constituent members'.

**4. Are you content with the proposed functions in the draft STB proposal?**

No

**5. What other functions do you think an STB should have/not have and why?**

We are content with many of the functions proposed in table 1 of the consultation document, in addition to the 'general functions,' particularly the construction of footpaths and bridleways, providing grants for the provision of public transport facilities, integrated ticketing, clean air zones and securing the provision of bus services. However, the STB must consider if additional functions are needed to ensure that its aims in relation to the natural environment can be achieved.

For example, in June of this year the UK government adopted the target of net zero greenhouse gas emissions by 2050. This acknowledges work by the Climate Change Committee (CCC) which recognizes ***'the importance of policies made outside of Westminster. How housing and transport needs are met in our towns and cities, or how the natural environment is managed in each area of the UK. Achieving net-zero overall requires an integrated set of policies throughout the UK...'*** (Lord Deben, Chairman CCC)

A number of Local Authorities in the South East (including several TfSE members) have passed climate emergency motions in the past few months. It is important that TfSE's work supports the ambitions of these councils as well as the UK Government's legally binding new target of net zero greenhouse gas emissions by 2050. We believe that the STB should be to play a lead role in identifying and implementing transport solutions in line with the Climate Change Act. The climate change impacts of transport growth in the South East (including aviation) should be quantified and measured against a reduction target.

We welcome the recognition of the importance of the natural environment in paragraphs 2.2 and 3.6 of the consultation document (although we believe this should be strengthened.) We anticipate targets relating to the enhancement of the natural environment in the emerging transport strategy. For example, we would be looking for 'net gains' in biodiversity, in line with government policy. We expect that any system for prioritizing investment in projects across the region will take proper account of the natural environment and wellbeing, in addition to economic growth. Strategic interventions across the south-east should aim to offer high returns on investment (vfm), and as high a degree of compliance with environmental/public health criteria as possible.

We would like clarity as to how the local plan process will interact with the transport strategy. For example, we would not like to continue with the historic 'predict and provide' model but move to a 'vision and validate' approach. We do not want to see a continuation of the narrative of roads used to 'unlock development' which implies that this new development will be car-dependent, contributing to congestion. Instead we need to plan well-located mixed development which reduces the need to travel by car.

**6. Would you be content with an STB having such functions if any use of those functions required the consent of the relevant local transport authority?**

Yes

Transport for the South East aims to maintain continuity from the governance structure that has served members effectively during shadow operation. Some key decisions may require a vote, such as the transport strategy, annual budget and amendments to the constitution. A number of voting options have been explored, with a preferred option based on the population of the smallest individual constituent member. The preference will be to reach a consensus on all decisions, but where this cannot be achieved a weighted vote will be used. All 'constituent members' will need to consent to the final proposal to DfT.

**7. Are you content with the preferred voting mechanism, to be used when consensus cannot be reached?**

No

**8. Any other comments**

We are concerned that the protected landscapes representative and district councils do not have a vote.

## Your information

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<b>Would you like to receive news and other updates from Transport for the South East?</b>	Yes