

Prepared by Jools Townsend, chief executive, drawing on the ACoRP team and members in the South East

About ACoRP and community rail

The Association of Community Rail Partnerships (ACoRP) is a not-for-profit organisation working across Britain to support, advocate for and represent community rail: a growing grassroots movement that involves communities in their railways, helping people to get the most from local lines and stations, and helping the rail industry put communities at the forefront. Our burgeoning membership includes 69 community rail partnerships (CRPs) and 200 station friends, social enterprises and other local groups.

Our mission is to empower, support and champion community rail, helping it to:

- enhance the railways' contribution to local sustainable development and community wellbeing, including by maximising access to and use of the railways;
- ensure the community has a voice and plays a part in the development and improvement of our railways, so this meets community needs and aspirations and delivers maximum benefit;
- communicate the development and importance of our railways to communities, enhancing understanding and pride, and promoting rail as a key part of sustainable, healthy travel.

Community rail's importance is evidenced in our [Value of Community Rail](#) report. This found **community railway lines consistently perform better** in terms of usage, plus **wide-ranging social, environmental and economic benefits** being delivered, in line with the government's [community rail strategy](#).

ACoRP's role is to connect those working in community rail, share good practice, and help our members to develop and overcome challenges. Our [services](#) include support and advice, resources, training, an annual conference (delivered with the DfT) and national awards. We also strive to raise awareness about community rail, ensure it has a voice, and promote collaboration with the third, public and private sectors.

ACoRP is funded by the Department for Transport (DfT), our biggest funder. We also receive funding from devolved governments, authorities, agencies and industry partners, including South East train operators. We are a small organisation, but stepping up our work to help community rail realise its potential, and acting as lead delivery partner for the DfT's [Community Rail Development Strategy](#).

Find out more about our work, and our members, at communityrail.org.uk.

About this submission

This submission draws on our extensive experience supporting and championing community rail over two decades, and our understanding of activities, views, opportunities and challenges in community rail. We draw on qualitative and quantitative evidence on the impact of community rail, as well as reviews of academic research on community engagement and sustainable transport. We have included links to key documents, and can provide a more comprehensive range of academic sources if needed.

Based on our set-up, we seek to broadly represent our members as a whole, highlighting key insights, lessons and opportunities that emerge from their work. However, we cannot speak on behalf of any one our members, especially their local priorities and concerns. We have therefore encouraged our members to respond directly and urge TfSE to consider their responses, and *ensure effective engagement with community rail on an ongoing basis through the strategy's delivery*.

We would be pleased to supplement this response with further discussion, details, examples and sources, or direct to our members delivering this work, if helpful.

Submission summary

We respond to all consultation questions below. However, we summarise our main views as follows:

- We and our members support TfSE's development of this strategy, and are enthusiastic about working collaboratively with TfSE and its members to deliver on its aspirations to build a

sustainable, people-focused sustainable transport network. Evidence shows that community rail, and community engagement in transport generally, has a key role to play in achieving this vital goal;

- We strongly recommend that community rail (and community engagement in transport) is clearly acknowledged within the strategy, including its existing role in the transport landscape of the South East, and its scope to play an enhanced role in future, and **a broad commitment to engaging communities in the ongoing delivery of the strategy, in an ‘engage and provide’ approach;**
- We strongly support the commitment to creating a sustainable transport network, and ending the car-orientated, reactive approach that causes such damage to people, communities and their environment. But we highlight below various places where the strategy’s focus on this could be strengthened, and where conflicting elements undermine this goal, especially by prioritising road building and enhancements in the short-term. If the South East is to be a leader in sustainable development, and the climate emergency tackled, these inconsistencies need to be rectified, with clearer commitment shown to shifting away from private cars and road-based freight;
- We strongly support the strategy’s commitments to improving the rail network throughout the strategy’s life-span. However, we note that there is much more work to do to flesh out how this programme of work will be delivered, partly related to current uncertainties around the franchise system. We and our members, brought together through their ‘ComSE’ group, are keen to feed into this further as plans take shape;
- We recommend the **approach to *integrating* sustainable transport modes is significantly strengthened.** Improving bus and active travel network, alongside and aligned with rail development, is of huge importance in achieving a people-orientated sustainable travel network delivering maximum benefit for the South East. Our experience supporting members, plus research and expertise from elsewhere in the transport field, clearly points to the need to join up walking, cycling, bus and rail, in ways that work locally (and with local people involved in that change), if we are to enable and persuade far more people to travel sustainably. This needs to include both infrastructure improvements as well as timetabling and ticketing. This area of work faces many challenges, but devolved authorities like TfSE can play a crucial role in addressing these;
- We recommend making far clearer the **responsibilities of local authorities and partners** in delivering the strategy (rather than deferring to government), and how this will be coordinated in a way that engages local communities and ensures people and places are firmly at the forefront.

Questions 6-9: ‘our approach’

6. 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?

Strongly agree

7. 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 tick one box

Strongly agree

8. 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 tick one box for each feature.

The South East is less reliant on London and has developed its own successful economic hubs – Important

The benefits of emerging technology are being harnessed – Important

Land-use and transport planning are better integrated – Very important

A shift away from private cars towards more sustainable travel modes – Very important

Targeted demand management measures, with more mobility being consumed on a 'pay as you go basis' – Very important

The transport system delivers a cleaner, safer environment – Very important

9. Do you have any additional comments about our approach to developing the draft Transport Strategy? Please describe these below

We strongly support the arguments (and the evidence basis for these) made in 1.17, that continually developing car-based infrastructure, and prioritising car-based travel within transport and planning, has come at a terrible price for communities and our wider environment. The huge volume of traffic we now see in the South East, and associated air pollution, noise, road danger and congestion, causes a multitude of detriment for people and environment locally, and our future globally. Some further evidenced factors that reinforce this position, but are not explicitly acknowledged here, include:

- devastating effects on health and premature deaths caused by air pollution from vehicle fumes and sedentary habits that are associated with car-based life-styles;
- contribution to the climate emergency, and the existential threat it poses globally as well as more immediate and local threats from extreme weather and flooding – with transport now the biggest source of greenhouse gas emissions in the UK, and cars the largest share within the sector;
- detriment to health and wellbeing from congestion, noise and road danger, including through causing delays (with its damaging impact on bus users as well as those in cars), and disturbance, fear and casualties within communities;
- erosion of community vitality and cohesion from car-based planning and life-styles;
- exacerbating inequality through disadvantaging those who cannot access a car, including one third of adults nationally and a growing number of young people;
- erosion of natural places through road building/widening, car parks, noise, danger and fumes – damaging wildlife and habitats, and restricting people's ability to connect with nature and landscape, and enjoy crucial mental and physical health benefits these spaces should provide.

As well as welcoming the draft strategy's acknowledgement of the damage that car-orientated transport planning has caused, we strongly support its recognition that transport can, if delivered in a sustainable, people-centric way, deliver a myriad of social, environmental and economic benefits. We firmly agree that transport should be treated in this positive, proactive manner, rather than a series of problems to be fixed.

We know from our members' experiences, and [evidence on the value of community rail](#) and of public transport and active travel, that by providing good quality, sustainable transport that meets local needs, and which local people feel ownership of, far-reaching, profound benefits can be delivered for people and place. This includes helping local people to feel a sense of efficacy and pride, enabling sustainable development, enhancing local places, boosting social inclusion and cohesion, and of course improving accessibility and mobility, so more people can access the opportunities they want. This concept of what can be achieved through local people, authorities and transport providers working together locally, with sustainability and inclusion at the forefront, is reflected in the DfT's [Community Rail Development Strategy](#), and is something that we are happy to advise TfSE on further. Working together to enhance the role of community rail, and extend community engagement in transport, would be extremely relevant to achieving its strategic aims.

Based on our long-running experience supporting community rail, and extensive research available on how transport can serve communities better now and in the future, we strongly support TfSE moving away from a 'predict and provide' model. **However, we recommend it goes one step further than 'decide and provide', and moves to an 'engage and provide' approach, engaging local communities as much as possible in the transformation of their transport network, on an ongoing basis.** This would help local authorities and transport providers across the South East to put people and places at the forefront. It would enable a deeper appreciation of what is needed locally to help everyone get around, without further

damage to environment, health and society. And it would offer a way for the people in the South East to have involvement and ownership over the huge shifts that are needed to bring about a sustainable transport system. This would chime with the consultative approach TfSE has taken in developing the strategy, ensuring that not only initial consultation, but *ongoing engagement* is central to its delivery.

We are extremely supportive of the idea of moving away from planning for vehicles towards planning for people and places, incorporating a strong focus on modal shift towards sustainable and healthy travel. However, we suggest the way this is set out in the draft strategy (figure 1.3) makes it sound like planning for places is different to, and one step on from, planning for people, when the two are (and should be) intertwined. People are dependent on their (local and wider) environments and vice-versa. A simpler way of conveying the shift might be to talk about moving away from planning for vehicles towards 'planning for people and place', or better, 'planning for people, places and communities'. This would show a focus on strengthening communities, not weakening them, as car-based planning has done.

In addition, while minimising the need for *vehicular* travel is beneficial in many ways, it should be remembered that a large proportion of the population does not have free and easy access to transport and the opportunities it affords, and enabling such access can be transformational for people's lives. Therefore, **efforts to minimise unnecessary journeys must be balanced with the great value in improving access to sustainable mobility**. It should also be remembered that not all journeys are damaging: walking and cycling are healthy, sociable, good for communities and businesses, and don't damage the climate or local environments. In future, it may be that the same could be said for journeys combining active travel with rail and bus, an ambition that might be incorporated into TfSE's strategy if it is to lead in this field.

Finally, we suggest this section is confusing, as the chosen scenario model, 'sustainable route to growth' is not shown among the options in figure 1.4. Moreover, the title of this model is also conflicting with the stated aims and ethos of the strategy, as it implies that, while the route will be more sustainable than at present, *the end goal is still economic growth*. This reinforces the idea of economic growth at any cost, widely shown by research (and acknowledged in the draft strategy) to be exactly the concept that has led to much environmental degradation, as well as damage to health, wellbeing, inclusion and communities. Logically, if the economy, like transport, is supposed to serve people and place, and not the other way round, economic growth can never be the end goal. As this title appears to be intended to reflect a sense of sustainability and ongoing economic development being simultaneously achieved, **we recommend the model is instead termed 'sustainable development'**. This would more clearly align TfSE's approach with international efforts and research, including by the UN, to establish what sustainable development looks like, and might assist TfSE's ambition to be a world leader in sustainable transport and development.

Questions 10-11: 'our area'

10. 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?

Tend to agree

11. 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.

We broadly agree with most of the points made within chapter two, in particular the comments made about the importance and benefits of completing rail electrification and developing capacity (p42). However, we are somewhat disappointed to see that the South East's burgeoning and important community rail network is not mentioned in this chapter, nor elsewhere within the draft strategy, and urge that this is rectified. There are currently 12 community rail partnerships covering 18 routes (including some large, well-established and highly-regarded organisations) and approaching 100 station friends groups within the region, carrying out important work that aligns with the strategy's goals and is likely to be increasingly important as the region shifts more towards sustainable transport, in engaging local people in the alternatives to driving. Those numbers are expected to grow, with several potential new community rail partnerships already in contact with ACoRP. Some example activities are showcased in our [Value of Community Rail report](#) and [Community Rail Awards winners' booklet](#). ACoRP, and its South East members, brought together through

their 'ComSE' group, are happy to provide further detail. **It would be beneficial and highly relevant to TfSE's aims to acknowledge this role in chapter two, and other relevant places in the strategy.**

Our other recommended improvements and additions to chapter two are:

- The walking and cycling section on p46 underplays the scope for greatly enhancing walking and cycling in the region, making it sound as though active travel is already a prime mode of transport, when DfT data shows walking levels are a fraction of what they were, and cycling only accounts for a small percentage of journeys. National statistics show that the majority of car journeys are walkable or cyclable in terms of distance (or would be if a safe route was provided). Our members' experiences in the South East attest to the fact that walking and cycling links to railway stations are often in need of improvement, so there is much to be done. While it is important to acknowledge the importance of walking and cycling for leisure, this is (usually) separate to using walking and cycling for transport, with walkers and cyclists commonly accessing leisure destinations by car. We suggest, therefore, **a fuller picture of the decline of walking and cycling, and great benefits of enabling more people to walk and cycle, including to access public transport, should be given.** It would also be relevant to note local authorities in the South East delivering [Local Cycling and Walking Infrastructure Plans](#), and how this links to the strategy;
- It seems an omission that **there is no analysis in this section of the region's bus network, and its decline** (as is acknowledged elsewhere), including the value of buses in relation to economy, society and environment. Our experience supporting community rail suggests there are **many challenges in linking bus and rail travel effectively**, and if these were overcome it would make huge difference in enabling more people to travel via sustainable means, for entire journeys. We therefore strongly recommend that this issue is grappled with within the strategy.

Questions 12-14: 'our vision, goals and priorities'

12. 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 giving our residents and visitors the highest quality of life.' To what extent do you support or oppose our vision for the South East?

Tend to support

13. Do you have any further comments on our vision?

There are many aspects of the vision we strongly support, including the focus on achieving net-zero carbon emissions, and combining connectivity with environmental quality. We strongly support the notion of achieving a high-quality, reliable, seamless and accessible network of sustainable transport options, for the benefit of people and communities. Experience in community rail demonstrates the importance of these factors in encouraging and enabling more people to use rail travel, especially in combination with other sustainable means. However, we are also concerned that these critical, forward-looking and community-focused elements are somewhat undermined by other aspects of the vision and strategy, meaning it lacks the focus and coherence needed to be a clear and inspiring *raison d'être* that everyone can get behind. We propose it could be greatly strengthened, in these ways:

- 'By 2050' is surplus to requirement, and arguably unhelpful, in that the vision marks the ultimate end-goal of the strategy anyway: the future world it is trying to create. It also makes the strategy sound like a slow response to pressing concerns and issues, such as the climate emergency, which we don't have 30 years to deal with; this undermines the aim to be a world leader;
- The term 'sustainable economic growth' is confusing and questionable in its logic, as sustainability invariably suffers if economic growth is prioritised above all. The vision would align with international leadership and thinking on sustainability if it were to refer to 'sustainable development' instead;
- The first sentence seems overly wide-ranging, and could be more focused on transport. It might read better as, 'The South East's transport network is a world leader in supporting sustainable

development and benefitting local people, places and communities.’ This would be much shorter and more clearly reflect the ambitions stated elsewhere to be orientated around people and places;

- The second sentence signals an ongoing precedence to economic growth over people and sustainability. The high-quality transport network has many adjectives, but none of them refer to sustainability. It also seems to put trade before quality of life, which undermines the purported step-change in approach, to put people and places first. To improve coherence and impact, and create a sense of the strategy being for the people of the South East, this sentence might instead read, ‘We benefit from a high-quality, seamless, accessible and sustainable transport network, which enhances quality of life for all, respects our environment, and enables business to flourish.’

In summary, we recommend reworking the vision to more clearly, succinctly and impactfully reflect the impressive ambitions, and people and place-focused ethos displayed elsewhere in the strategy, such as:

‘The South East’s transport network is a world leader in supporting sustainable development and benefitting local people, places and communities. We benefit from a high-quality, seamless, accessible and sustainable transport network, which enhances quality of life for all, respects our environment, and enables business to flourish.’

14. 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?

Improve productivity and attract investment to grow our economy and better compete in the global marketplace – Neither agree nor disagree

Improve health, safety, wellbeing, quality of life, and access to opportunities for everyone – Strongly agree

Protect and enhance the South East’s unique natural, built and historic environment, and tackle climate change together – Strongly agree

15. 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?

Better connectivity between our major economic hubs, international gateways and their markets – Tend to agree

More reliable journeys between the South East’s major economic hubs and international gateways – Tend to agree

A more resilient transport network to incidents, extreme weather and the impacts of a changing climate – Strongly agree

Helping our partners meet future housing, employment and regeneration needs sustainably – Strongly agree

Use of digital technology to manage transport demand, encourage shared and efficient use of transport – Strongly agree

A network that promotes active travel and active lifestyles – Strongly agree

Improved air quality through initiatives to reduce congestion and encourage shifts to public transport – Strongly agree

An affordable, accessible transport network for all that promotes social inclusion and reduces barriers – Strongly agree

A seamless, integrated transport network with passengers at its heart – Strongly agree

A safely planned, delivered and operated transport network – Strongly agree

A reduction in carbon emissions to net zero by 2050 – Strongly agree

A reduction in the need to travel, particularly by private car – Strongly agree

A transport network that protects and enhances our natural, built and historic environments – Strongly agree

Use of the principle of ‘biodiversity net gain’ in all transport initiatives – Strongly agree

Minimisation of transport’s consumption of resources and energy – Strongly agree

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

We support the broad principles of enhancing the region socially, economically and environmentally, but the way these goals are summed up and titled means some conflict with others, due to the way that a focus economic on growth tends to undermine social and environmental goals. As stated above, the three goals would work more in synergy if the economic goal were instead defined in terms of sustainable development, including creating a *fairer* economy, providing for all *now and in the future*, rather than simply growing its size, which produces negative social and environmental outcomes. In addition, the priorities underneath the goals do not point consistently to a people and place-centred approach and achieving modal shift away from cars. We suggest below some ways this may be addressed.

Nevertheless, we largely welcome the detail in figure 3.1, showing the range of ways that transport can positively impact. We broadly agree with these points, but suggest the critical difference that sustainable transport can make to social inclusion, equity and cohesion, is made more prominent. Through our members' work in community rail, and research, it is clear that enabling more people to access public transport and active travel has life-changing effects for individuals, and creates a more equitable society, by enabling people to access employment, training, social and leisure opportunities they may otherwise have been excluded from. The impact this has, not only on economic activity, but people's health, wellbeing and social connections, is acknowledged in the [cross-departmental government strategy on tackling loneliness](#) (see p40-41, which includes acknowledgment of the role of community rail in this). Given TfSE's people-centred approach, we propose that this important role of transport could be brought more to the fore of the strategy. In our experience, such a **focus on supporting vulnerable and excluded people also greatly supports efforts on environment and economy, since those who face transport barriers are often those who are least economically active and least likely to access a car**: therefore providing for their needs works in synergy with creating modal shift and enabling equitable economic development.

Aside from this, we don't propose any additional priorities, but offer some comments on how we have rated each priority, and suggestions on improving their framing and focus so they work more coherently together:

- **'Better connectivity'** is something we and our members strongly support, but recommend this not only focuses on connectivity between major economic hubs and gateways. For maximum economic, social and environmental benefit, the connectivity of *sustainable modes* should be improved across the network, prioritising connecting people with business, training and leisure opportunities and connecting local businesses with trading opportunities. It should stress the importance of improving *connectivity between sustainable modes*, which is not given the attention it deserves at present;
- **'More reliable journeys'** is strongly supported by us and our members: community rail experience shows the importance of more reliable journeys by rail and other public transport. However, to achieve environmental and social goals, and the aim of modal shift, the focus should be on more reliable journeys *by public transport and active travel*, and, again, not only between major economic hubs and gateways. There is a risk with taking a narrow view that parts of the network are neglected and let down the rest, when there is little value in half of your journey being reliable if the other half is not. The priority should be to improve reliability for whole journeys, taking a holistic view;
- We strongly support **use of technology** to ensure the South East's communities can get the most from their transport network. However, this priority mentions only road and rail and not bus/coach, unless that is what's meant by road. We recommend the strategy more overtly and confidently prioritises improving public transport and active travel over private car, and ensuring integration between these modes, if its aims are to be achieved: something technology can play a key role in;
- We strongly support all priorities under the social goal, but propose **social inclusion** is brought more to the fore, and its relationship with economic and environmental goals acknowledged. We also note a commitment to zero transport casualties, which we welcome, but suggest this is more prominent, since it represents a bold and forward-looking view when it comes to road casualties;
- Achieving **net zero carbon emissions** we strongly support, but the long timeframe on this priority undermines the urgency of decisive action being taken in the next 5-10 years to prevent climate breakdown. We recommend the need to make major shifts rapidly, and achieve net zero much sooner than this, is acknowledged, and the more appropriate terminology of **'climate emergency'**

used instead of climate change, aligning with the UK Parliament and local authorities' declarations;

- We strongly support the need to reduce private car travel, but also strongly recommend this priority is **more clearly worded to convey the major shift away from private car use needed**, especially given the growing evidence and awareness that electric cars are not a panacea. A [recent parliamentary report](#) asserted that 'widespread personal vehicle ownership...does not appear to be compatible with significant decarbonisation'. We also mention, again, the idea that reducing the need to travel must be balanced with ensuring equitable access to sustainable travel for all;
- Finally, we strongly support minimising transport's consumption of resources, but propose this priority ought to acknowledge **the great opportunities to power transport through renewables**, including in rail, where work is already taking place in the South East (at Aldershot in collaboration between Network Rail and social enterprise Riding Sunbeams) to power rail through trackside solar.

In regards to the key principles in 3.14 to support delivery, on the whole we strongly support these, and note that they go some way to answering our concerns about economic growth still being prioritised at the expense of social and environmental benefits. However, we suggest, **given the importance of the statement in the first principle that economic growth should not be at any cost, these principles should be more prominent, and clearly reflected in the goals and priorities**. At present, there is no mention of this point in the goals and priorities themselves.

In addition, we have a reservation about part of the wording of the principles in 3.14. While we firmly support the idea of transport users being at the forefront of transport development, experience in community rail shows the need to think beyond this, to those who are currently excluded or otherwise not accessing transport. Part of community rail's important role is to reach out beyond existing rail passengers, to support communities as a whole to engage with and feel able to use rail, including children and young people who are forming transport habits and mobility horizons, marginalised groups who currently lack the confidence to use rail, and people currently reliant on car travel. Engaging these groups in rail is especially beneficial in terms of economic, social and environmental gains, since it improves mobility, access to opportunity, social inclusion and sustainability. **We therefore recommend that the principle is to not only put current users at the heart of transport, but people, places and communities as a whole.**

17. 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?

Supporting sustainable economic growth, but not at any cost – Strongly support

Achieving environmental sustainability – Strongly support

Planning for successful places – Strongly support

Putting the user at the heart of the transport system – Strongly support

Planning regionally for the short, medium and long-term – Strongly support

Questions 18-21: 'our strategy'

18. 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?

Radial journeys – Strongly agree

Orbital and coastal journeys – Strongly agree

Inter-urban journeys – Tend to agree

Local journeys – Strongly agree

International gateways and freight journeys – Tend to agree

Future journeys – Tend to agree

19. 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.

Radial journeys – We strongly support the focus on improving rail capacity and reliability, which is clearly essential to these types of journeys, and we agree with the areas highlighted as challenges and opportunities, which appear to broadly correlate with our members' areas of concern. However, we additionally highlight the crucial importance of rail connecting with other sustainable transport modes: integration of modes, especially with longer-distance journeys, can make all the difference in terms of whether a journey is viable at all, or viable by sustainable means.

Orbital and coastal journeys – We strongly support the acknowledgement of the detriment caused to people and places by traffic, especially where major routes go through towns, villages and areas of natural beauty. It is important to note that, where local economies rely on visitors, such damage to the environment will also hinder attractiveness to visitors and therefore economic development, as well as local health and wellbeing. Conversely, our members' work promoting their local lines and stations to visitors show how a sustainable (and historic and scenic) journey can be part of the attraction.

Inter-urban journeys – We have concerns that the contents of this section do not match up with the strategic aims, vision and principles. It conflicts with the strategy's aim of being a global leader in sustainable development, and to move away from a reactive stance providing ever more road capacity, to also talk about road widening and building as though it is a necessity. If the strategy is to be consistent with its vision and aims, where there are large volumes of traffic on particular routes, causing detriment to people and place, and holding back economic development, the response must surely be 'how can we enable people to travel via alternative, sustainable means between these places?' and not 'how can we provide for these increasing volumes of traffic?'

Local journeys – We strongly agree with the challenges listed, but would add some key supplementary points based on community rail experience:

- the difficulty aligning bus and train timetables is indeed a critical problem in most localities, but is not an inevitability (as is implied here); we suggest that **grappling with this problem could be a key step TfSE takes**, as a devolved transport authority, to build a more sustainable, integrated network;
- poor connectivity between rail and bus does not *only* affect those with limited mobility, as is implied here – it hinders *everyone's* ability to use these important modes in combination;
- the retrenchment of the bus network has already had a damaging effect on mobility – it is not merely a risk in the future as is implied here – and therefore we recommend **the strategy could be much bolder about undoing this retrenchment, not just preventing further decline**;
- the scaling back of bus services, and affordability issues with train and bus travel, are not only affecting vulnerable people (although we agree this is a critical consideration): **they are also severely stymieing any efforts to encourage people to swap driving for sustainable transport**. It is unrealistic to think someone will be persuaded to leave the car at home if they can't rely on a bus turning up or getting them to the train station on time, or there are no buses home again that evening, or if it costs more to buy (perhaps multiple) ticket(s) than take their car or a taxi.

International gateways and freight journeys – We largely agree with the challenges identified, especially those to do with dramatically increasing modal share of public transport access to the airports. However, again, within this section there is a leaning towards road enhancements as an inevitability, rather than more innovative thinking around how goods and international visitors can be moved via non-polluting and non-damaging means. It may also be relevant, in a 30-year strategy, to not assume that air traffic growth will continue unabated, given its major contribution to the climate emergency.

Future journeys – While we tend to agree with the challenges outlined here, we propose there is a much larger challenge which has not been acknowledged at all, namely how to support, encourage and persuade large parts of the population to use public transport and active travel *instead of driving*. The challenges relating to future journeys as outlined instead suggest that achieving widespread use of electric vehicles is the main issue (at the top of the list), yet experts increasingly recognise that electric vehicles are not a panacea to our transport problems: they still cause air pollution and congestion, clog up our towns and cities, use many non-renewable materials, encourage sedentary lifestyles, and for the foreseeable future they remain too expensive to be within the reach of most of the population.

This fundamental challenge of shifting mindsets, habits and lifestyles away from driving does not appear to be acknowledged anywhere in the strategy, yet is at the heart of achieving its vision. It is a complex and difficult problem, given that driving has become so embedded in most people's lifestyles and identities, and the history of car-orientated planning that the strategy acknowledges. This needs to be grappled with in the strategy, and there are many lessons and insights from the community rail movement that are relevant to this. Research suggests that community-level engagement and action is fundamental to achieving this major shift in attitudes and behaviours, and therefore the well-established community rail network can play an important role in supporting this. **It would be highly beneficial for the strategy to acknowledge this role of the established community rail network, and the importance of all those involved in transport delivery embedding a community engagement approach.**

20. 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 tick one box for each journey type.

Radial journeys – Tend to agree

Orbital and coastal journeys – Tend to agree

Inter-urban journeys – Tend to agree

Local journeys – Tend to agree

International gateways and freight journeys – Tend to agree

Future journeys – Tend to agree

21. 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.

In general, we agree strongly with the challenges identified relating to the rail network, and improvements to rail cited as initiatives to address these challenges. We believe, from community rail's experience working with the rail industry and local partners to promote and enhance local rail travel, that rail can play a fundamental role in achieving the sustainable development and benefits to people and place that are desired for the South East. However, we have some concerns, firstly, that this section does not take a holistic enough view of movement across the region, and makes little acknowledgment of the need to provide for whole journeys, in an integrated manner, and to therefore align and join up efforts to develop different sustainable modes. This section also repeatedly undermines the strategy's vision and principles, frequently mentioning road capacity increases as though they are inevitable, rather than providing a clear and determined focus on improving and developing the alternatives to driving, in synergy with one another. The inclusion of such initiatives also ignores recent evidence that road building schemes are not even having the economic impact hoped for (such as in Swale, for example).

In addition, there is clearly far more work to be done to flesh out details, which makes it hard for us state our support. For instance, on p70, saying that the initiative to address poor connectivity for 'left behind towns' is to 'improve connectivity' leaves major questions about how this will be delivered, with any number of options available, some of which our members are actively advocating, but some involving trade-offs and difficult decisions. With initiatives like this, local engagement is invaluable, perhaps imperative, to deliver truly sustainable, people-focused, equitable results. Yet this section does not provide any assurances of local engagement. We strongly urge that community engagement is built into all initiatives taking place through this strategy, especially building on existing networks like community rail and wider civil society.

Some more specific comments are given below.

Radial journeys – We note that rail *and* road improvements are identified as initiatives to address a couple of the challenges. One might assume, given the focus on sustainability within the draft strategy, that road improvements would primarily be geared at enabling better bus/coach and active travel connections, particularly linking to improvements in rail capacity. However, we recommend this should be overt, as well as acknowledging that where rail capacity improvements are made, these will generate opportunities to encourage people to access these corridors via sustainable means.

Orbital and coastal journeys – While we strongly support the challenges identified here, we have some concerns about inconsistent focus on sustainability, people and place across the initiatives outlined. We

strongly agree with the initiatives to improve capacity and extend electrification to the rail network, although suggest that even with these initiatives, a bolder approach still might be adopted, such as aiming for complete electrification during the strategy's lifespan. However, the other initiatives seem to suggest further road building and capacity enhancements could be on the table, which undermines the aims and principles outlined elsewhere. We suggest that, without pre-determining the details of solutions that clearly need to be further worked out and consensuses built, this section could have a far clearer slant towards achieving a mass shift away from car-based journeys.

Inter-urban journeys – We strongly support the intention to improve inter-urban rail connectivity and to improve or maintain inter-urban bus viability. However, we urge that this work is delivered in a harmonious, mutually-supportive manner, ensuring that bus, coach and rail join up effectively with each other and local active travel facilities. At present, our members' experience, in the South East and nationally, is that there is usually a failure to connect bus/coach and train services, and inadequate consideration to enabling people to make entire end-to-end journeys by sustainable means when different modes are being developed. We also suggest that the statement about 'at the very least, maintaining the viability of bus services' lacks ambition, and doesn't live up to the strategy's vision. One might question how the South East can become a leader in sustainable transport without delivering major improvements to what it acknowledges to be an inadequate inter-urban bus service.

Local journeys – We support all the initiatives outlined in this section, especially the commitment to creating multimodal transport hubs, **which community rail could play a major part in developing**, in a way that puts local needs and contexts at the forefront. ACoRP is currently working with partners to develop a comprehensive toolkit for community rail and other community groups on community-led station travel planning, and will be stepping up our support for members on this area of work, including in the South East. We are keen therefore to discuss with TfSE how community rail can support this, and urge that this opportunity, and importance of engaging with communities on this, is acknowledged here.

More broadly on this section, while we support the intentions behind all the initiatives mentioned, we believe this section could go much further by outlining how TfSE will work as a regional transport body with local operators, authorities and DfT to decisively address these major challenges, beyond simply 'lobbying'. We again emphasise the importance and value of community rail partnerships and groups, and community engagement generally, in supporting this work, such as by throwing a spotlight onto local needs and opportunities, and helping to bring transport partners together to align modes.

International gateways and freight journeys – We strongly support the initiatives to do with improving rail capacity, access and services, which will be hugely helpful in allowing more people and goods to travel by rail. However, we are again concerned about the inclusion of road enhancements, which undermines the vision and principles of the strategy. We suggest a bolder approach, of considering and exploring alternatives to these challenges, would be more in keeping. We are sure that our members and rail partners in the South East would be keen to explore opportunities and ideas, especially to enable a much **greater share of freight to go by rail**, which would be highly beneficial in addressing the environmental, health, wellbeing and road danger effects of road freight. We suggest that the aim of working collaboratively to enable a much greater share of freight to go by rail ought to be expressly stated.

Future journeys – Following our comments above, we strongly recommend that initiatives are included in this section to engage people at a community level in improving alternatives to driving, to build momentum and positivity towards a shift away from car-based travel. This should include engaging young people, as the transport users of the future. Clearly, the well-established and effective network of community rail partnerships and station groups can play an important part in this. Community rail already plays a crucial role helping rail industry partners to be more future focused, by helping them to engage with people beyond existing passengers, including children and young people, and highlighting opportunities that will help current and future generations to travel more sustainably. **This type of work is shown by research to be powerful when it comes to encouraging more sustainable behaviours**, hence we recommend it would be beneficial to give it suitable prominence in the TfSE strategy.

Questions 22-23: 'implementation'

22. 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?

Economic performance indicators – Tend to agree
Social performance indicators – Tend to agree
Environmental performance indicators – Tend to agree

23. 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 the future funding challenges?

In the 'priorities for interventions' section on p92-93, an approach is described of prioritising immediate needs through roads development, and then shifting to a more sustainable approach in the medium to long term. While we understand that priorities and needs may change over the strategy's lifetime, and that a shift away from car-orientated transport will take time, this again undermines the overarching vision and creates a sense of moving in one direction (a continuation of the current car-based planning the strategy states at the outset is so damaging) to later do an about-turn. We would question whether it makes sense to continue in the short-term with an approach that, by the strategy's own admission, is highly damaging to people, their health, wellbeing, and local and global environments, and at a time when change is made so pressing by the climate emergency. **If the South East wishes to be a global leader in sustainable transport and development, it must surely lead now, from the outset of the strategy**, and take a bolder approach than is described in the draft. It seems appropriate that this change in approach should at least start to be phased in from the outset of the strategy, rather than mid-way, but we also recommend that how this all-important transition is to happen should also receive some attention.

Nevertheless, we fully support most of the priorities described, especially the high priority given to rail development throughout the strategy's lifespan, which must surely form the backbone of the region's sustainable transport network. We also give our wholehearted support to the priority being given to urban mass transit and public transport access to airports, and to transport interchange, although we recommend that this priority should be reworded to make clear that it is interchange between *sustainable* modes (public transport and active travel) that is prioritised. We also suggest that, to be in keeping with the strategy's vision and approach, strengthening the region's bus and coach network, in synergy and alongside rail, should be included in this list. Given the acknowledgement elsewhere in the strategy of the major decline in bus services, and importance of buses working in tandem with other modes to enable mobility for all, strengthening the bus network must surely be a vital strand, for the region to develop an integrated sustainable transport system that enables a shift away from car-based travel. It also seems remiss to include modal interchange amongst the strategy's priorities without ensuring that one of the key sustainable modes is functioning at a suitable level: there is little point in creating attractive new transport hubs around railway stations if there is no bus service to speak of that people are able to use to get to and from them.

The only priority we disagree with, at least in the way it is presented, is the first, on highways. This seems to seriously conflict with the strategy's vision and approach, by stating that not only road improvements, but new roads will be prioritised in the short term. As acknowledged in the strategy, prioritising car-based transport, and reacting to increases in traffic by providing for ever more traffic, is damaging and unsustainable in social and environmental terms, and does not seem to deliver on economic development aspirations either. It seems unlikely the South East will become a global leader in sustainable development by building roads, and indeed putting this top of its priorities, even in the short term. At the same time, provision for active travel, and bus users outside urban areas, and joining up these modes with rail, is not mentioned at all in the priorities list, which seems an omission, given the strategic aims.

In terms of the performance indicators in the table on p96-97, we largely agree with these measures being monitored and used by TfSE to assess progress. However, there are omissions from this list, and some inclusions that might be more bold. We also suggest that, as the list is a mixture of direct outputs and indirect outcomes, additional measures are needed to assess progress towards TfSE's vision, and consider the full range of impacts and outcomes. Our main comments are:

- While we strongly support 'improvements in long distance rail services', we know that improvements in all types of rail services are beneficial to economy, society and environment, and suggest these are not only assessed by journey times and frequency. Capacity and reliability are also key;
- We note and support the inclusion of smart ticketing on buses, but would suggest that TfSE also explores and progresses multi-modal ticketing to aid and encourage seamless sustainable travel as an attractive and affordable alternative to driving;

- Outputs are included on cycling infrastructure, but not pedestrian infrastructure. We strongly recommend this is included, as walking is the greenest, healthiest, most affordable and widely-accessible mode for short journeys, and given its importance in combining and interchanging with bus and rail. Our members' work shows the importance of people being able to walk to stations, and that improvements are often needed to enable people to feel able to access stations in this way;
- The indicators of social benefits appear rather lacking, and could be strengthened by inclusion of the following, which we are happy to advise on in more detail:
 - levels of community engagement in transport and its development, such as railway stations adopted, volunteers and activities taking place across the community rail movement, and other engagement and consultation activities; research shows this type of work holds significant social value in itself as well as helping to derive greater social benefit from transport by helping local needs to be considered and met;
 - public perceptions towards sustainable transport modes, their usefulness and accessibility; this would help TfSE to assess (shifting) attitudes towards, and the attractiveness and viability of, alternatives to driving, which is critical in achieving the modal shift desired and ensuring that everyone in the South East can enjoy the benefits of sustainable and healthy travel.
- We strongly support indicators to track reductions in carbon emissions and modal share of car travel; however, we recommend that these warrant targets, breaking the strategy down into phases, ensuring progress is made as rapidly as possible, given the urgency of the climate emergency;
- Another useful indicator, which might assist with the strategy's aim of delivering seamless and more sustainable journeys, would be to look at the sustainability of stations, drawing on work being undertaken by RSSB to create a sustainable stations standard (which ACoRP is advising on and hoping that community rail groups will play a role in delivering);
- The indicators on biodiversity appear lacking in ambition, framed as they are in a negative way. These might be more constructive in encouraging and ensuring progress if they were framed as 'Achieving biodiversity net gain' instead, which would also align with current practice and thinking within transport, such as the approach being taken by Network Rail;
- Consideration of lessons from other regions, in leading on sustainable transport development, and benchmarking against the UN's sustainable development goals (translated for use in a regional transport context) might be appropriate given the strategy's vision.

On the role of TfSE, we would emphasise the keenness and willingness of those working in community rail in the South East, and ACoRP as its umbrella body, to work with and advise TfSE on its potential role in relation to rail as this takes shape, given whatever changes emerge from the Williams Review. For information, ACoRP and its members have fed in comprehensively to the Review, and will continue to advise DfT and our rail industry partners, on how our railways might be run in a more community-minded way that delivers maximum social benefit. [Our main response can be found here.](#)

Questions 24-25: 'integrated sustainability appraisal'

24. To what extent do you agree or disagree that the Integrated Sustainability Appraisal represents a thorough assessment of the draft Transport Strategy?

Tend to agree

25. Do you have any additional comments regarding the Integrated Sustainability Appraisal?

While we certainly don't dispute the assertion in the ISA that rail (and any transport) development can and often does have adverse environmental effects, and fully support the need to understand and manage such risks, we would query whether opportunities to mitigate and counter such effects are fully explored within the appraisal. In particular, the appraisal acknowledges the damaging effects of traffic, and new and enhanced road development, on people's health and wellbeing, the natural environment, and our climate. Yet it does not seem to take into account where development of rail and other sustainable transport modes, can *reduce* the environmental and social detriment caused by car travel, by allowing people to travel by alternative means. It would seem highly appropriate and useful, for a strategy seeking to make the South East a world leader in sustainable transport, for an appraisal to explore not only the environmental and social risks and benefits of developing specific transport modes, but the environmental and social opportunities that can be realised through prioritising and engendering a shift towards sustainable and active travel modes instead of driving.

Questions 26-27: 'overall views'

26. 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.

Tend to agree

27. 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.

As set out above, we wholeheartedly support the majority of intentions expressed in the strategy's vision, strategic goals and priorities, and its approach of sustainable development, rather than growth at the cost of people's health, wellbeing and communities, and the local and global environment. However, as we have shown, there are many aspects of the draft strategy that undermine this vision, goals and approach, veering back towards car-based, reactive transport planning, almost making it sound inevitable. For the South East to be a leader in sustainable transport and development, as the vision states, it must surely lead from the outset of the strategy, not continue with the old approach, which it acknowledges to be damaging in so many ways. This is especially important given the urgency of tackling the climate emergency, as declared by many local authorities across the South East, and regarded by the public as top priority. This requires dramatic changes, especially within transport, *in the coming decade*. Strong leadership on sustainability within transport is critical, given the way that not only our transport system, but also people's lifestyles and identities, are so wedded to the car.

Those working in community rail are keen to support and work in partnership with TfSE, local authorities, rail and other transport partners, local businesses and volunteers at a grassroots and regional level to help achieve this shift, but it will make all the difference in bringing such partners together, behind a common goal, to have a coherent strategy that signals clearly from the outset that *sustainable* transport, based on rail, bus and active travel, is now what transport development in the South East is firmly focused on.

As well as improving the strategy's coherence and focus around this overarching goal, we also strongly recommend that the important role of community engagement, including community rail, is prominently and enthusiastically recognised. Research shows that it is at community level where greatest hope lies for achieving the changes we need in terms of shifts towards sustainable behaviours, including in transport. It is at community level where people can come together to make changes together, in tune with what is needed locally, for the benefit of people and place, now and in the future. It is also only with effective community engagement that those working in transport and governance can really grapple with how to build a transport system that works for all, achieving the inter- and intra-generational equity that defines sustainable development. Given the way that the car has become so ingrained in transport and society, if we are to shift away from this, concerted efforts must be made at community level, to support and enable people to *accept, engage with, and feel positive about* the alternatives. This type of work is happening all the time in community rail, to improve access to rail, help people have the confidence to use rail, normalise rail, and to advise rail partners where changes will help more people to take advantage of rail.

With community rail rapidly growing in the South East, and delivering an increasing range of positive outcomes to engage people in rail and sustainable transport generally, we urge that this role is acknowledged in the strategy, especially its ability to aid the shift towards people and place orientated transport planning. The community rail movement can play a strong role, as it always has, in helping those working in transport to put people, place and communities at the forefront, but it will be very helpful to cement this role in the strategy, and ensure that all those involved in the strategy's delivery engage and listen to their communities on an ongoing basis. From our experience supporting community rail partnerships and groups around Britain, this grassroots engagement and dialogue could make a great difference, in helping TfSE to build a world-leading sustainable transport system, that delivers as much benefit as possible for local people, places and communities, and their region.

For any queries on this response or to discuss further the insights and opportunities from community rail activity in the South East, please contact Daniel Wright on daniel@acorp.uk.com.