

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE SOUTH EAST: NON-PARTICIPANT ON MATTER 3

MATTER 3 REGIONAL TRANSPORT STRATEGY

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

1.1 The recently approved Regional transport strategy is in place to 2016, and the Regional Transport Board has now been established. While these should set a framework to complement and deliver the spatial strategy, the issues of access to services in rural areas, congestion and pollution that have been highlighted by Sustainability Appraisal will need further in depth work. Attention to the rail network is now an essential part of enabling modal shift from cars to trains. It is essential that the Regional transport Board's remit (including powers and funding) is extended to allow equal discussion of all modes of transport to enable more sustainable patterns of travel to develop.

1.2 The spatial strategy is focussed on urban development and on development focussed on hubs. We believe the almost automatic assumption that transport hubs can become development hubs is ill-founded and insufficient attention has been given to the wider spatial and environmental context of these hubs. It is also necessary to give much greater attention to creating effective and financially sustainable short interval bus services to encourage modal shift from car to public transport. Arrangements for car sharing should also be stimulated. There seems sometimes to be an overemphasis on high tech guided buses and other 'smart buses' when what is needed is reliable frequent services combined with better and 'smart' information systems.

1.3 The issue of rural accessibility has been raised in the sustainability appraisal. Rural roads are also now facing unsustainably competing demands: healthier living is encouraging people to walk and cycle more, and the rural economy is increasingly dependent on this for the development of tourism. At the same time 'rat running' through rural lanes, often at relatively high speeds, is encouraged by congestion on main roads and enabled by satellite navigation aids. Most rural road footways have disappeared in order to widen the roads for two way car traffic and for larger agricultural vehicles. These conditions are now unsafe in many areas and parish councils spend much effort on finding ways to achieve traffic calming with little legislative support. It is important to the character, tranquillity and safety of the countryside in the South East that these issues are acknowledged and actioned in an RSS that has a vision of being a healthier region and has confirmed the importance of quality of life.

**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)?**

2.1 CPRE regards ‘modal shift’ as an essential part of resolving the widely acknowledged problem of traffic congestion in the South East. Demand management including through road pricing, is one way of achieving this. But, importantly, road pricing is regarded as a ‘stick’ to achieve modal shift rather than as a means of winning revenue to fund highway improvements. The ‘carrots’ or incentives should include investment in alternative modes to the car – namely walking and cycling for which better footways and cycle ways are required, particularly in rural areas, as well as improved public transport including rail services.

2.2 At this early stage, it is difficult to assess how road pricing would work in the South East, bearing in mind its extensive, multi-centred settlement character, and there will be issues of risking further deepening deprivation of disadvantaged groups in rural areas. They will remain car dependent and should not be further disadvantaged by road pricing proposals. CPRE is also concerned that road pricing might result in motorists seeking alternative, cheaper routes through the countryside increasing the trend of ‘rat running’ already stimulated by the need to avoid congestion, and to seek legitimate alternative routes when major roads such as the M25 have accident delays.

### **3.3 Is the guidance on car parking standards, specifically for B1 uses, sufficient and appropriate (Policy T7)?**

3.1 Restraint-based parking provision for non residential development is an essential part of behaviour change encouragement, but must be accompanied with a clear understanding that alternative travel plans, based on train, shuttle bus, car sharing etc are available and actively supported by businesses as part of their ‘smarter working practices’ agenda. This is an area where imaginative work by LA’s can make this a strong part of their sustainable employment sites packages to encourage employment that reduces car commuting across the countryside of the South East, with consequential benefits for congestion, emissions, pollution and tranquillity.

### **3.4 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)?**

4.1 The major issue for the South East is that it is both a gateway for the rest of the UK (and transit to Ireland), and has a large population and economy that needs to be serviced. The high level of dependence of lorry freight for this servicing creates large and visible impacts of congestion, pollution noise, rest-hours parking etc. The most important policy must be T12: to progressively shift freight from road to rail, recognising that this will take a long time to achieve because the commercial conditions will need to change and the rail investment required is very large. The environmental imperative is an increasingly important factor. More rail will require inter-modal interchanges (T13), but these should be sited carefully to ensure they use brownfield sites where there is also room for commercial development. Under no circumstances should they eat up precious countryside, adding further to the land take for transport.

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

6.1 CPRE is sympathetic to the targets for economic growth in the South East which will fund a better quality of life, and resources to protect the environment. It is also aware of the importance of air traffic for supporting international economic activity based in the SE. However, the Air Transport White Paper is a major cause for concern, and we agree with others who believe it is time for a rethink. The publication of the Stern on the economics of Climate Change report should also now encourage this to happen. We do think the expansion of Gatwick is neither needed or economically justified and would have very damaging effects on high quality countryside in the region.

6.2 The White Paper focuses on major airports. CPRE is also concerned about the environmental impacts and loss of tranquillity arising from the current and planned further growth in activity in regional and local airports. As part of the rethink of aviation policy the further development of these should also be reconsidered, in the light of the acknowledgment of their currently under-calculated environmental impacts.

**30 October 2006**