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Sadiq Khan
Mayor of London
Greater London Authority
City Hall, The Queen's Walk
London SE1 2AA
Sent via email.

28 September 2017

Dear Mr Khan

SEEC Response to Mayor of London's Transport Strategy Consultation

1. Introduction

- 1.1 We respond on behalf of South East England Councils (SEEC), the cross-tier voice of local authorities in the South East of England. We are a voluntary membership body, bringing together county, unitary and district councils. Together we promote the views and interests of all tiers of local government across the South East, representing 9.1 million residents – the largest population in the UK.
- 1.2 The South East and London are the economic powerhouses of the UK economy. The interdependencies that underpin our collective success rely on effective transport in both London and throughout the South East. With a strong economy in its own right, the South East made £249bn GVA in 2015, 2nd only to London; and has over 1.2million residents commuting within the South East boundaries, roughly 750,000 more than those commuting into London. The South East makes a significant contribution to the UK economy, having made £154.4bn net profit for UK plc between 2000/01-2015/16 – the largest in the UK. The South East cannot simply be seen as London's commuter belt. We have our own significant economic potential that is being held back by inadequate infrastructure funding – concerns reinforced by research showing a £15.4bn infrastructure funding gap by 2030 in the South East alone. This must be tackled to ensure a strong economic future for our areas, and the UK as a whole, now and post-Brexit.
- 1.3 Alongside your ambitions for London, South East councils are ambitious to drive forward their own strong economic growth potential, as well as recognising commuting to London or other areas is a fact of life for some. Challenges exist in the South East for those commuting within the area, as well as those commuting in and out of London. These include train overcrowding, increasing demand for rail travel, rises in fares, the need for new orbital and radial routes and improving the reliability of existing services. LGA research estimates road congestion costs the average user £968 each year. SEEC's [Missing Links](#) report further highlights the need for strategic infrastructure investment in the South East to maintain its economic potential. The South East also provides an important global economic transport gateway for businesses from London and nationwide, giving access to international ports and airports. Rail service improvements have potential to unleash significant economic growth, reduce rail crowding and road congestion, deliver environmental benefits by reducing road traffic and improve quality of life for millions.
- 1.4 SEEC members welcome the constructive dialogue developing with London Deputy Mayor Jules Pipe through the Wider South East Political Steering Group (WSE PSG). Alongside important discussions about the emerging London Plan, the 21 July PSG also discussed early views on the Mayor's Transport Strategy (MTS). Our response builds on this discussion and focuses on three key issues for the South East:
 - Mutually beneficial transport priorities for existing local growth plans.

- Ensuring effective trains services for London and South East's needs.
- Improved surface access for Heathrow airport.

2. Mutually beneficial transport priorities for existing local growth plans

- 2.1 We are pleased to see the MTS includes the 13 large-scale strategic transport priorities agreed by the WSE PSG (MTS p.178-9). These are important schemes for which Government support is needed to ensure existing economic and homes growth plans are delivered and transport deficits addressed.
- 2.2 However, as SEEC members highlighted at the 21 July PSG, it is incorrect for the 13 priorities to be described by the Mayor as housing growth corridors in the event that London cannot meet its needs. These schemes are needed to cope with existing pressures, congestion and planned growth - they are not identified to open up further additional new housing development areas.
- 2.3 It will therefore be important that the MTS, and the London Plan, make clear these 13 transport priorities are intended to deliver mutual economic benefits for the South East as well as London. This includes relieving existing congestion, as well as encouraging more 'self-sufficient' areas outside London - with investment in jobs and services alongside planned homes, reducing travel which could assist the Mayor's transport strategy aims eg. less demand on London's services for commuting, and improved orbital routes in the South East which reduce the need to change via London.
- 2.4 We welcomed TfL's commitment at the PSG that it would remove the consultation map (MTS p.179) which indicated housing growth corridors from London into the South East. This map and associated description caused concern for South East councils - it was inconsistent with discussions on the emerging London Plan WSE policy approach and the move to looking for willing partners rather than defined corridors. Inclusion of this map would risk the unintended consequence of prejudicing development of the London Plan.
- 2.5 As you are aware, many councils in the South East already face challenges meeting their own existing high levels of housing demand, have their own local economic and growth ambitions, and face infrastructure and protected land-use constraints. Our members are clear that it cannot be assumed there is capacity outside London to help accommodate its unmet housing needs. We welcome your efforts to accommodate as much as possible of London's housing need within the Mayor's boundaries. However if a gap remains and you propose to look beyond London to address this, our members have stressed that any work with councils outside London to help accommodate growth must be on the basis on 'willing partners' and mutual benefits.

3. Ensuring effective trains services for London and South East's needs

- 3.1 The MTS sets out the Mayor's ambition to seek control of local stopping suburban rail services from DfT (MTS p.151). This would potentially include services that start or finish in the South East beyond London's boundaries. Some SEEC members believe the prospect of TfL (Transport for London) taking over management of some services in the South East has the potential to better integrate and improve rail services across London and the South East. Some areas would also welcome new opportunities for extending rail Oyster Card zones and cheaper rail fares beyond the London boundary into the South East. However, this will be dependent on the condition that both sides of the London boundary receive equal benefits; and that the views of South East residents and commuters are represented through effective partnership.
- 3.2 Transport links should focus equally on supporting the economic success of London and the South East; providing benefits such as shorter travel times and increased frequency of trains for residents across the South East. In particular we seek assurances about how you will address South East councils' concerns about the challenge of successfully mixing longer-distance fast trains (serving the outer South East) and stopping services (primarily serving London) on the same lines; and what modelling you have done to demonstrate you can minimise risks of service disruption. SEEC members would not support changes that reduced the service quality and frequency, or increased journey times, for longer distance rail travellers.

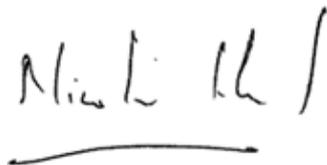
3.3 If the Mayor's plans on this issue are to move forward constructively, we ask for South East local government political representation on the TfL board. This would give a voice for South East passengers, enabling an open dialogue with South East elected representatives on changes and rail proposals. We must avoid an accountability deficit where the elected London Mayor controls areas where he has no remit or voters. We also welcome TfL's offer at PSG to extend invitations to TfL's South or West London partnership engagement meetings to relevant South East councils.

4. Improved surface access for Heathrow airport

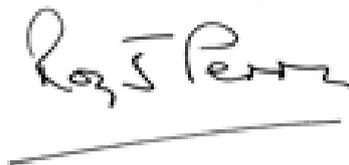
4.1 As a key global gateway, we agree with you on the importance of improvements to sustainable surface access to Heathrow. These are vital to meet existing demand, regardless of any plans for expansion (MTS p.248). As Heathrow sits on the London boundary many transport routes to the airport pass through the South East. Better surface access is vital to deliver a step change in public transport capacity and connectivity, and requires commitment to western and southern rails access to Heathrow. The Mayor should emphasise that these improvements are necessary now to tackle existing transport problems, and not just as pre-requisites for Heathrow expansion to proceed. We also encourage the Mayor to put pressure on the operators to include a substantial financial contribution from the airport itself.

We look forward to continued engagement with you on these important issues.

Yours sincerely



Cllr Nicolas Heslop
Chairman, South East England Councils
Leader, Tonbridge & Malling Borough Council



Cllr Roy Perry
Deputy Chairman, South East England Councils
Leader, Hampshire County Council