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Consultation Response - Does England need a National Transport Strategy?

England's Economic Heartland (EEH) is one of the seven sub-national transport bodies in England. Covering the region from Swindon across to Cambridgeshire and from Northamptonshire down to Hertfordshire, EEH serves a region of over 5.1 million people and supports an economic output of more than £160bn. The region is home to some of the UK's most significant economic assets, with technology and science clusters that flow out of the region's universities and start-up incubators. The Cities and Local Government Devolution Act 2016¹ set out the legislative framework for sub-national transport bodies, including the requirement that the Secretary of State must have regard to proposals contained in the transport strategy of an STB, where they 'appear to the Secretary of State to further the objective of economic growth in the area'.

Through their boards of elected representatives, sub-national transport bodies bring democratic accountability to strategic transport decisions at a regional level, thereby ensuring the strategies produced have the commitment and support of partners across the region. Our transport strategies are: developed using universally recognised and trusted data sets; multi-modal in approach; focused on connectivity outcomes rather than operational decision making on transport provision; and provide the framework for the role that transport must play in delivering England's environmental obligations and economic aspirations. Together, the seven STBs' regional transport strategies are already providing a national transport strategy for England.

In February 2021, following two rounds of public engagement and an extensive integrated sustainability appraisal, EEH published its regional transport strategy to 2050, 'Connecting People, Transforming Journeys'.

Since its publication, EEH has further developed its thorough evidence base, designed to be compliant with central government requirements and to complement activities underway with other STBs. The evidence base and transport strategy provide a clear multimodal framework on

¹ [Cities and Local Government Devolution Act 2016 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

which both national infrastructure agencies and EEH local authorities can plan, prioritise and deliver transport and connectivity across the Heartland region.

It is within that context that EEH welcomes ICE's work on the potential for a national transport strategy and is pleased to respond to your consultation.

Question 1: What are the key gaps and challenges within the existing approach to transport planning in England?

Previously, the development of a national transport strategy (including: A new deal for transport: better for everyone (1998) and Towards a Sustainable Transport System (2007)) have required extensive development and analytical activity before arriving at a single agreed transport strategy. While that is a valuable effort, it can only be realised if investment decisions and regulatory frameworks are redesigned in order to deliver the outcomes of the strategy.

Before embarking on the process of developing a strategy, a key area of focus should be ensuring commitment to appetite for delivery and willingness to prioritise funding according to the recommendations of the strategy. Without a commitment to mode-agnostic and devolved decision making, the potential for a strategy to make an impact will be limited.

Question 2: Should a new national transport strategy be developed for England or the UK as a whole?

Given the extensive strategy work already completed at regional level, EEH's view is that any English strategy would need to be 'light touch' in approach. It would be more effective if the strategy was focused on consolidating the key principles and policies from existing national and regional strategies and providing direction to the government on the most effective way to implement recommendations in the short, medium and long-term. Adopting this approach would help support better decision-making and delivery. It should also, crucially, support the move towards regional funding allocations based on an agreed, stream-lined policy framework.

By bringing together existing strategies into one place, the national transport strategy could be produced relatively quickly. Its legitimacy and creditability comes from the extensive work, evidence bases and engagement already carried out by DfT, National Highways, Great British Railways, the National Infrastructure Commission as well as the seven sub-national transport bodies.

National documents which are modally or theme-specific would be fed into the strategy and include:

- Road Investment Strategies
- Great British Railways 30-Year Plan
- Bus Back Better
- Transport Decarbonisation Plan
- National Freight Plan
- Gear Change
- Union Connectivity Review

These would be joined by the transport strategies of the seven sub-national transport bodies together with Transport for London, which in turn take account of local policies, including local transport plans.



Consolidating these national and regional documents will help identify common over-arching themes, challenges and policy objectives, for example around net zero, economic growth, levelling-up and strategic corridors.

This would provide the basis for government to identify the funds required to enable delivery of agreed national policy outcomes; monitor progress; and to ensure that regional proposals are consistent with those national policy outcomes.

This in turn would allow the country to address one of the biggest barriers to creating a more integrated, better connected and successful transport system: a continued lack of certainty over infrastructure funding. The consequence of this uncertainty negatively impacts business decision-making, impedes the delivery of sustainable economic growth and undermines a joined-up, system-wide approach to infrastructure planning.

Question 3: What role should different stakeholders play in delivering better transport outcomes in England (e.g. central government, subnational transport bodies, the National Infrastructure Commission)?

Sub-national transport bodies, working in partnership with DfT and national organisations such as ICE, are ideally placed to lead the production of a ‘light touch’ national strategy.

Our regional evidence bases ensure that the needs and opportunities within each region would form the basis of such a strategy. Our agreed transport strategies strengthen the linkage between plans prepared by local transport authorities and those developed and delivered by national infrastructure owners.

STBs already work across modes and our regional strategies already take account of national, regional and local policy objectives. There is a strong ethos of collaborative-working between STBs and our local, regional and national partners which would be vital during the creation of the strategy.

The STBs’ agreed strategic transport plans would also enable the government to deepen the use of a programme approach in confirming the allocation of funds – ultimately leading to regional funding allocations.

Regional funding allocations are one of the biggest opportunities to improve the way strategic transport is planned and delivered in England. It would allow STBs to provide to government a realistic pipeline of investment – agreed by the region, while meeting the policy objectives set out in a national transport strategy.

Question 4: What timeframe should a strategy cover and how often should it be reviewed?

Given the length of time it takes to deliver major infrastructure, any strategy should be long term in approach, in line with existing sub national transport and mode specific strategies. It is recommended that the strategy covers transport and connectivity planning to 2050.

Question 5: How can a strategy be made resilient to political change?

The use of cross-party groups, such as sub-national transport bodies and All Party Parliamentary Groups ensure cross party engagement and consensus to priorities. The sub-national transport

body boards across England are, by their nature, cross party. There is also already a requirement set out within the legislation for the Secretary of State for Transport to consider STB strategies in their decision-making meaning that by default, a national transport strategy formed of existing sub regional strategies would have local-level cross party support.

Question 6: How can existing data be best used to improve transport outcomes – and what data gaps exist?

The STBs already have extensive data sets that have been designed to improve transport decision making. EEH would be willing to share more information about our products and data with the ICE as part of this discussion.

Question 7: What existing mechanisms and approaches could be used to achieve the desired integration if it proves impossible to get an integrated transport strategy off the ground?

One of the biggest barriers to an integrated transport system is a lack of integrated thinking at the national level. Places, defined by local and combined authorities as well as regional bodies such as STBs, are best placed to respond to linear policy making that is often necessary at the national scale.

While there are many examples of existing mechanisms that could be used or amended to achieve the desired integration of transport in places, one such example is regional funding allocations.

Regional funding allocations are one of the biggest opportunities to improve the way strategic transport is planned and delivered in England. It would allow STBs to provide to government a realistic pipeline of investment – agreed by the region, while meeting the policy objectives set out in a national transport strategy.

Question 8: What lessons can be learnt from other countries with national transport strategies?

We note that the ICE's green paper references how the UK's other countries – Scotland, Wales and Northern Ireland – each have their own version of a national transport strategy and with it a level of funding allocation: most of the seven sub-national transport bodies, including EEH, have populations similar to or bigger than Scotland's 5.5 million (and indeed the other countries referenced: Norway and New Zealand).

We welcome the opportunity to comment on the ICE's Green Paper and look forward to working with you going forward.



Naomi Green
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