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9th September 2022

Submitted via email to: tfse@eastsussex.gov.uk

To whom it may concern,

Transport for the SouthEast (TfSE): A Strategic Investment Plan for the South East (consultation)

Please accept this letter as the consultation response submitted on behalf of the [Thames Valley Chamber of Commerce](#) (TVCC) – one of the largest accredited Chambers in the UK and the only accredited Chamber of Commerce for the Thames Valley (including Berkshire) and our membership. See “About the TVCC” below.

Our response has been prepared following direct engagement with selected members, including the respective Presidents of our four local chamber advisory groups and businesses based across Berkshire, and relevant professionals (e.g., planning consultancies, transportation operators, landowners, academic institutions, etc).

Our response has also been informed by our own policy development work in preparing our [2022 Business Manifesto](#)¹ (BM) wider business consultation and our [Local Policy Priority Statement](#)².

Our BM is strongly aligned to the TfSE SIP proposal and includes, as one of its three main priorities, “Helping secure investment in resilient infrastructure, utility, and sustainable networks”. There remains (in 2023) an emphasis on securing resilient and decarbonising transportation networks.

We invite you to review both these documents in the context of the Strategic Investment Plan (hereafter SIP) and this consultation response. Our comments follow.

General Comments

- We commend TfSE on a well-structured SIP document. The level of investigation, evidenced-based approach, policy development and analysis are applauded. The SIP rightly puts green growth and world class urban transport systems at the heart of its strategy.
- The full SIP is detailed and, in some instances a little repetitive. The executive summary is therefore a welcome compliment.

¹ <https://www.thamesvalleychamber.co.uk/business-manifesto/> .TVCC is currently preparing its 2023 BM which will be informed by the TfSE SIP.

² Each year our local Chambers, in consultation with its members and key stakeholders, reviews its priorities and publishes a Local Policy Priority Statement. For more information, please visit our website - <https://www.thamesvalleychamber.co.uk/local-chamber-policy-priorities/>

- The document appears somewhat insular. It may be strengthened by a greater acknowledgement and reflection on the fact that economic geographies do cut across the TfSE boundary. Therefore, the potential impact of plans and policies, opportunities, and challenges of projects (e.g., New Thames Crossing East of Reading) are influenced and affected by this wider regional (and in some instances national) footprint. Is the SIP either underselling, or omitting, the impact of some of the proposed schemes, on a cross-boundary and national scale, which may weaken the case for support?
- The document is detailed and very complex (over-complicated?) with multiple aims, criteria, and measures. For technical experts and lay-reader alike this may make it a little difficult to digest and fully interpret and perhaps enables the document to be used to ‘justify all things’? Whilst admirably comprehensive in scope, we consider there is danger that the inclusion of so many projects does not enable stakeholders, or TfSE itself perhaps, to grasp a sense of priority.
- We find the omission of any comment on the proposed expansion of London Heathrow airport (LHR), other than support for some public transport schemes. This is an error and very surprising, especially given strong links to key themes within the SIP, such as integrated transport, freight, global gateways, growth, new jobs etc, and that the maintenance of the competitiveness of the UK’s only international hub is of significant regional and national economic importance.
- Further, in our opinion, the has also lost the emphasis to highlight the existing pressure on the transport network of the two-runway airport and the need for improvement to be prioritised irrespective of any expansion plans. We are concerned that this loss of emphasis may have caused a range of interventions to lose urgency. We ask that for consistency some improvements should be prioritised ahead of any expansion, particularly to reduce road congestion and carbon emissions and to facilitate freight and passenger access.
- We highlight two opportunities which we consider underplayed within the SIP:
 - i. The visitor economy (tourist and business trips) is a valuable sector across much, if not all, the SE. There are a handful of inclusions to “visitors” in the beneficiaries – but nothing specific and, in our opinion, there is insufficient recognition of value added which may impact on prioritisation and undersell schemes/projects.
 - ii. Lack of emphasis of using green technologies³ to support delivery of outcomes or of using schemes to stimulate the green tech sector, i.e., pull and push approaches.
- We welcomed the approach to planning for people and places in the Transport Strategy which is less explicit here. We recommend strengthening that message in a similar way to that in the Transport Strategy. Would encourage a dialogue with central and local government to ensure that strategic spatial planning for housing, employment etc is integrated and adopts the same principle.
- We suggest that, whilst Planning policy interventions were identified as a high priority in the Transport Strategy they were also described as short-term. This might imply they could be swiftly and relatively easily implemented. Is this a correct assumption and is there more work required to bring together the many stakeholders you list, all of whom may have different levels of understanding and priorities, together?
- There is no section on Cross-regional interventions. Suggest this could be included within the section entitled packages of interventions? The SIP’s sub-regional analysis (from page 32)

³ For example see our 2020 consultation response on “Decarbonising Transport Setting the Challenge” at: https://www.thamesvalleychamber.co.uk/wp-content/uploads/2020/09/28-08-2020_Decarbonising-Transport_TVCC-response_final.pdf

tends to give emphasis to local schemes. It potentially fails to highlight and recognise schemes of cross-regional importance whose benefits stretch more widely (e.g., WRLtH and Heathrow expansion – see above).

- In regard one area (see also our comments below on the Bus, Shared Mobility and Mass Transit Thematic Plan) looking at a large regional level plan, it does make it hard for, in this instance, local buses / journeys to fit into the strategy. We have concern that whilst regional cohesiveness is very much welcomed, as highlighted by the points we raise about third Thames bridge and A34, the very different pulls of Dover and Heathrow mean that important details such as these might somehow seem to be on the periphery.

Western Rail Link to London Heathrow (WRLtH)

We welcome the inclusion of WRLtH in Core Rail interventions (O1) – this is a project we fully endorse. In addition:

- We commend you to review the TVCC’s business-led programme of work⁴ in regard [WRLtH](#) and welcome the opportunity to share information on background analysis.
- We extend an open invitation for TfSE to engage TVCC to support our shared ambition for the timely delivery of the scheme, stressing:
 - WRLtH’s contribution to HMGs levelling up agenda is beyond the SE and cuts across multiple English regions and to south Wales.
 - WRLtH’s contribution to network resilience, urban transit and east-west travel.
 - WRLtH has been identified by developers and business across the Thames Valley and beyond as a cornerstone of urban regeneration and renewal, and continued investment and business retention.
 - LHR is unusual, among European hub airports, in not having a direct rail link to a substantial part of its economic hinterland.
 - In the context of the SIP, WRLtH meets all five of the Drivers for Growth.

Further we refer you also to the representation submitted by Heathrow Airport Limited. We fully support and endorse their comments on WRLtH.

Full Strategy (Executive summary and Introduction)

- Broadly endorse the vision and the three strategic goals. However, we would like to see more emphasis on decarbonisation⁵ and pathways to net-zero.
- The investment strategy is welcome but suggest a little more background on the basis for the numbers at this stage. To us it is not clear whether the estimate of £150bn is a total cost of all projects recommended, or of a priority subset, or whether this is the basis for bids and/or is fully or partly funded? Further, are the 12,000 additional jobs being proposed direct and/or indirect? Can this be differentiated in the SIP? How do these also tally with the much larger numbers quoted in the Transport Strategy of 2020?
- Appreciating there is more background (in supporting documents) how the costs and outcomes tally with individual project numbers? For example, the case for WRLtH estimated 42,000 new jobs, £800m added GVA and a reduction of 5,000 tonnes of CO₂; the current cost estimate is below £1.5bn.

⁴ See: <https://www.thamesvalleychamber.co.uk/wrlth/>

⁵ See also TVCC’s consultation response on Decarbonising Transport Setting the Challenge at: https://www.thamesvalleychamber.co.uk/wp-content/uploads/2020/09/28-08-2020_Decarbonising-Transport_TVCC-response_final.pdf

- In addition to the comments and our reasons for wanting to advance the delivery of WRLtH, we support rail package proposals for Southern Rail Link to Heathrow (O2), the Reading to Basingstoke Electrification (O3).

Investment priorities (from page 23)

We support the eight investment priorities and offer that there is opportunity to:

- Place a stronger emphasis on how the vibrancy of the SE economy is critical to the overall UK economy (inc. vital to HMG delivering it's levelling-up agenda) and how some of the SIP proposals, projects and plans have benefits outside the SE.
- Include Air within an integrated transport system.
- Include, within global gateways, specific reference to Heathrow & Gatwick airports? Pre-pandemic LHR was the UK's largest freight port by value (16%), handling 30% of non-EU exports (see also benefits of investing in the SE).
- In addition to 'transforming east – west connectivity'⁶ widen support to the benefits of enhancing north-south links - both internal to SE (see pages 16/17) and as part of the SE region's commitment to the wider economy, e.g., links from Southampton beyond Berkshire into Oxfordshire (A34 improvements are required)?
- Emphasise the importance of strengthening the strategic linkages with neighbouring areas where they are part of the economic functional geography of the SE region, e.g., into Oxfordshire and Swindon and impact on the wider UK⁷.
- Focus more on stimulating innovation and business growth (and the associated skills and talent) in the green transport sector. This might include, for example, automotive, rail and aviation sectors, battery, and hydrogen sub-sectors? The SIP could be setting high standards/the highest standards for project impacts and outcomes and laying out incentive plans for specific interventions. You may wish to note most recent news items on the UK – with the Thames Valley and SE at the industrial heart - has one of the world's largest clusters of companies developing zero-emissions components for electric vehicles⁸.

Benefits of Investing in SE (from page 26)

- Commend specific reference to net-zero, productivity, and increased volume/value of trade. Suggest though, there is benefit in having more specific indication of the *SMARTer* outcomes to be achieved.
- Whilst outlining the drivers for growth (page 29) is welcome, we believe the SIP will be strengthened by the inclusion, for example, of planning for people and places (which was a strong theme in the Transport Strategy); support for a wider workforce strategy (i.e., the need to develop our people and talent, rather than necessarily trying to find new); enabling access to trade beyond Europe (facilitated by the strength of LHR as a freight port and UK's only hub airport).

⁶ See: <https://www.thamesvalley.co.uk/location/connectivity/>

⁷ See also TVCC's consultation response on Union Connectivity: Call for Evidence at: https://www.thamesvalleychamber.co.uk/wp-content/uploads/2021/01/12-2020_Hendy-Review_TVCC-response_final.pdf

⁸ See article posted at: <https://www.thamesvalleychamber.co.uk/policy-and-regional-representation/thought-leadership/>

Packages of Interventions (from page 32)

Global policy interventions

- Benefit to the UK (page 35). Suggest the SIP expands on the evidence behind the scale of benefit and wider impact outside the SE boundary and explicitly detailed the added value of the six listed (pages 35/6). Explain, more clearly, how these relate to strategic goals and 8 investment priorities on policy impact and understanding.
- The use, if it is an intended consequence, of the SIP as a ‘pull and push’ to stimulate business growth in sectors, e.g., decarbonisation, would appear to be a practical intervention.
- We have strong reservations over the inclusion of any statement on ‘future road pricing policy’, despite the comment that such will be ‘designed to leave the transport systems user (as a whole) no worse’ without substantive evidenced based research and consultation with users – especially business. Propose this is excluded at this time pending the above.
- We encourage you to add the following additional line within the ‘new mobility technologies being delivered primarily through private investment’ (page 37) to read, ‘and urge government to take a neutral stance to incentivising different technologies to avoid premature frustration of viable solutions’.
- We do not agree with the blanket assumption that the interventions ‘will be applied across the UK’ as this fails, in our opinion, to recognise the different barriers and opportunities across the UK regions. Suggest potential re-write to say, ‘Assumption that the interventions will be applied across the UK with sensitivity to their need and relative impact, so ensuring a level playing field. to avoid possible detrimental impacts on our residents and businesses.’
- The SIP appears to have lost the emphasis in the TfSE Transport Strategy on the existing pressure on the transport network of the Heathrow two-runway airport and the need for improvement to be prioritised irrespective of any expansion plans. We are concerned that these losses of emphasis may have caused a range of interventions to lose urgency. We ask that for consistency with the Transport Strategy some improvements should be prioritised ahead of any expansion, particularly to reduce road congestion and carbon emissions and to facilitate freight and passenger access.

Wessex Thames

Alas another confusing acronym for business. In regard the three packages of interventions as programmes and policies develop, we actively encourage TfSE to reach out to business well in advance to seek their views, input, and contribution. TVCC welcomes your approach to help support you and engage our membership and wider business community. In addition to the comments made elsewhere in this consultation response, with the suitable caveats applied concerning detail, we broadly:

- Welcome and support the rail package interventions O1, O2, O3 and O18.
- Welcome being consulted further on mass transit interventions P3, P7, P9, P12 and P17.
- Support active travel intervention Q1.
- Commend the SIP for including the intervention of a New Thames Crossing East of Reading (R6) noting this is an example, see above, where a project will need a wider regional perspective and support beyond the TfSE and SIP boundary.
- Welcome and support the highways interventions R3 and R8. Seek clarification as to what additional works are being supported, ref: R15 which we assume are largely complete / will be completed by the time the SIP is ‘adopted’?

Funding and Finance (from page 80)

Welcome the analysis of the F&F landscape and particularly of multiple sources of funding and finance and the work behind case building. TfSE's openness to supporting less traditional solutions is to be encouraged. We do:

- Express concern that the assessment of national and local government's ability to fund at all and national government's willingness to fund schemes in the SE may be over-optimistic especially given other priorities and competing demands on the public purse.
- Suggest the SIP needs a strong/stronger message into HMG 'to be clear, flexible and open-minded' about how interventions outlined can be financed and solutions found that share risk but deliver schemes. Current delays are stifling broader investment benefits aimed for in the SIP and wider regional plans of other stakeholders.

Delivery (from page 107)

- Whilst broadly endorsing the roles and responsibilities the SIP should explicitly reference Accredited Chambers within the sub-section 'private sector and third parties'. The Chamber network has a potentially crucial role in supporting TfSE with the delivery of the SIP. BY way of example this Chamber is, as outlined above, providing leadership in promoting the timely delivery of WRLtH and, in regards [sustainability](#), hosting a business-led working group that has, within its work programme, aspects of the SIP aims and objectives.
- Endorse the monitoring proposals and welcome the indicators outlined (page 120).

Area Studies: Bus, Shared Mobility and Mass Transit Thematic Plan

Relevant members have provided the following specific comments in regard this Area Study. We invite you to note:

- Table 2.1 (page 7) omits the electric tramway and subsequent electric trolleybus system that was present in Reading from 22nd July 1903 until 3rd November 1968.
- The section on deregulation (page 8) contains, we argue, an unsubstantiated negative commentary about '*unscrupulously and unsafe practises*', and doesn't highlight the significant benefits that have been derived from bus companies being able to respond to customer needs without significant bureaucracy.
- Comments (page 15) about the absence of tap on/off and fare capping in West Berkshire, Wokingham, Bracknell and RBWM. We are unclear as to why these areas have been singled out. There is no difference in payment arrangements than anywhere else in the TfSE area / whole country. We suggest what the report should highlight is that, for example that:
 - Wokingham has the highest level of car ownership by head of population.
 - RBWM the lowest level of bus use per head of population in the whole of the UK.
 - Wokingham also has very car-friendly parking and road building policies without a single metre of bus priority, whilst many of the flows to/from Maidenhead are covered by national rail services due to its location on the main line.
- Barriers to use (page 18) - only comments about fares. There are many much larger issues, such as frequency and punctuality, that our customers directly tell Bus Operators are more important and could be tackled by infrastructure investment (see also below – page 22).
- Orbital connections (page 20) are highlighted as an issue. We suggest that network coverage broadly reflects demand for mass transit, and the difference between financially sustainable mass transit and services necessary for social inclusion needs greater exploration to highlight the need for sustained revenue funding for network expansion.

- Barriers to use (page 22) - again the study focuses on fares alone and omits government reductions in spending and new regulations being the reason for above inflation cost increases. For example, the cut to Bus Service Operators Grant (in 2013), the introduction of the requirements for low floor buses and reduced emissions which increased operating costs (since 1987) above a normal inflationary rate. Meanwhile the cost of private motoring, one might argue, has seen increased '*subsidy*' by freezing the fuel duty escalator for multiple years. In addition, we suggest that 1986 is not a good time to start comparisons as it was after significant structural changes were made. Bus patronage fell far more sharply in the 1950s and 1960s as private cars became much more prevalent.
- Overall, we suggest the area study fails to identify a key weakness that service and network planning at individual local authority level means that wider strategic goals for financially supported socially necessary cannot be met. In the case of Reading, for example, what we have is bus routes that go through four local transport areas, but publicly funded services generally remain within local authority boundaries.

Finally, we welcome proposals for stakeholder engagement and ask that you include the Thames Valley Chamber of Commerce in any future engagement proposals and consultation opportunities as a matter of course. You may wish to note we were not directly invited to comment, nor can we see any regional representation from the Chamber network, or for that matter other business membership organisations, on the Wessex Thames - Area Study Forum. We feel this is a major gap in your stakeholder engagement and we look forward to this being addressed.

We look forward to hearing more and contributing to any debate about prioritisation and delivery as the SIP evolves and we, as a key stakeholder, play our part in collectively helping strengthen capacity that will support the delivery of the SIP.

Yours Sincerely,



Paul Britton
Chief Executive
Thames Valley Chamber of Commerce

About the Thames Valley Chamber of Commerce

The Thames Valley Chamber of Commerce (TVCC) is one of the largest accredited Chambers within the UK and the only accredited Chamber of Commerce for the Thames Valley region. The TVCC is a proven centre of excellence for trade and inward investment services.

Representing over 4,000 companies in membership, with an economy estimated in size to be more than £83,848m (2015), it is home to over 115,000 businesses, including: 11 of the world's top 15 tech companies; the No.1 University in the world (Oxford); fastest growing city (Reading) in the UK (EY); once again, the two highest performing cities (Oxford and Reading) according to PwC; the second largest trading city in the UK (Slough); the most productive city per capita (Slough) (Centre for Cities) and the No.1 region, outside of London, for attracting inward investment. In addition, the Thames Valley Chamber credits a range of impressive statistics:

- 295,000 combined number of staff employed by members
- 5000+ number of active trade customers
- £1,692,474,094– the value of international trade enabled
- Average 150 new trade customers each year
- 178 countries trading with our customers
- 83 sectors represented by members and international trade customers
- Consistently one of the UK's most attractive locations for attracting inward investment
- Approx. 65% of international companies setting up or expanding in the Thames Valley have been supported by TVCC.