

Based on the updated document, here are revised responses to the consultation questions:

1. How could the transport network be better ‘joined-up’?

The INTS needs to be people focused, exploring integration from the perspective of the user, not the mode(s). The Transport Planning Society (TPS) believe it would be a missed opportunity if this work leads to an integrated transport **network** strategy – the focus must be on taking an integrated approach to both the activity and the means of facilitating that. This will entail thinking wider than how cycle lanes and train stations join up or integrating ticketing between trains and buses, but more fundamentally about how we support people to access services and opportunities most sustainably and efficiently. It won’t be necessary in all cases for the activity to require the use of the network (e.g. as a consequence of new ICT tools), embedding the Avoid:Shift:Improve framework should therefore be a key element of the new strategy.

In our cover letter, we propose “five core integrations” that we believe are necessary to truly realise an integrated national transport network that fully contributes to all the wider government missions.

- Integration of an “optimise first” approach to managing the network across all key transport operators and responsible authorities
- Integration across government departments, and particularly with respect to climate and land use & transport
- Integration across all tiers of government around a core mission to deliver sustainable transport
- Innovation in how integration can support access to the network by all users
- Integration between the mission and the funding and expertise necessary to deliver it

In our answer to this consultation question, we have picked out the following key elements for delivering a more joined-up system.

- **Integrate Transport & Land Use Planning:** Foster collaboration between land-use planning and transport policies to minimise the need for people to travel and ensure genuine sustainable development, providing choice in access. Aligning Local Transport Plans (LTPs) with Local Plans will achieve better integration. Strengthen locational preference in the new NPPF to ensure new development is focussed in areas of high connectivity.
- **Provide renewed focus on the prioritisation of Active and Public Transport Modes:** Establish a people-first framework prioritising active travel (walking, cycling) and public transport options, particularly in urban and suburban areas

where the opportunity to travel by sustainable modes is the greatest. Ensure full integration between active travel and wider health and wellbeing services. Highlight the health disbenefits of inactive travel and the wider public health challenges associated with air pollution and road danger.

- **Enable Seamless Multi-Modal Connections:** Promote joined-up multi-modal ticketing and mobility hubs that integrate access to different transport modes, including active travel, micro-mobility, and shared mobility, with public transport, to enhance user convenience. Consider a new duty on local authorities and regional government to promote integrated transport solutions in locations most suited for their implementation, and resource them to enable delivery.
 - **Devolved Decision-Making:** Empower local authorities to implement policies and schemes that best reflect local needs but also contribute to a unified national framework to enhance regional connectivity and equity. Devolution provides an opportunity to support truly local decision-making, the INTS can help ensure that all these decisions efficiently contribute to a wider national mission to deliver a sustainable transport network, whilst still allowing local innovation. Ensuring that the existing (e.g. Mayoral Combined Authorities) and new (Mayoral Strategic Authorities) sub-regional bodies have the right regulatory powers to create genuinely integrated systems across functional economic areas is also vital. Strong “guiding minds” for local systems can deliver change quickly and cost-effectively, which should also help address ongoing issues of regional inequality.
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2. How could data be used to improve the transport network?

Data has a key role to play in the delivery of many of the key integrations we highlight in our answer to question one. Some specific examples could include:

- **Improved Journey Information:** Leverage real-time data to provide users with up-to-date information on journey times, delays, and alternative routes, ensuring better travel planning. There are some good examples of this in practice today, but it must be widespread and integrated across all modes and geographic areas. We also see great potential in proactively engaging with key providers of digital wayfinding to drive behaviour change and optimise network utilisation.
- **Performance Monitoring and Feedback:** Utilise data to evaluate system performance (including a far greater focus on robust before and after studies on major schemes), track progress against sustainability goals, and gather user feedback to refine our approach to appraising transport schemes and developing transport strategies. To raise the profile of the need for better evaluation,

consider opportunities to develop an independent post-implementation review unit. In addition, the DfT should do more to integrate existing local tools and evidence bases into national guidance quicker than is currently the case, ensuring all stakeholders can benefit from emerging best practice.

The Transport Planning Society suggests that both the methodologies used to assess a project's contribution to a National Integrated Transport Strategy, and the delivered wider benefits of policies plans and projects, must be supported by more structured and enforced before and after monitoring programs, and peer review. Unit E1 of TAG already provides a framework, but this could be extended to consider not just the transport impacts. New data sources such as mobile network data now allow the monitoring of impacts on people's movement, cheaper and better than before. Other, big data sources can be used to evaluate wider impacts, for example, house prices, land values and consumer spending before and after the project opens or the policy is implemented.

Oversight can be provided by a panel of peer reviewers – independent auditors of the model approach used, the assumptions made on model parameters and future development of the economy (as a major input to benefits assessment), and the before and after monitoring programme. Independence of the panel could be ensured through their appointment by an independent body such as the National Audit Office the National Infrastructure Commission or its successor. This approach was initiated some 20 years ago in the US and lessons can be learned and transferred.

An effective peer review process will not only lead to methodological improvements, it will also avoid poor decisions leading to wasted tax dollars, and improve public perception and potential engagement in delivering an Integrated Transport Strategy.

- **Optimised Resource Allocation:** Use data analytics to identify bottlenecks, prioritise infrastructure maintenance, and manage transport demand more effectively and proactively to support sustainable travel. A high profile national behaviour change programme to promote sustainable transport in an integrated way, using techniques from across public health, behavioural economics and consumer engagement, could play a key part in this. This could include using data on how users engage with the network to support changes in behaviour to help optimise the use of the network, negating the need for expensive additional capacity.
- **Ensure data for transport assessments for new development reflects our wider aspirations for the network.** The Fixing TA working group has undertaken significant work on this, in particular the need to increase the scope of the data used and to provide a focus beyond car use at peak commute times. The group

look forward to engaging with the Department on how this is best incorporated into new guidance around the practical delivery of vision-led planning.

- **Accessibility Mapping.** Develop comprehensive datasets highlighting accessibility of different development sites, and how new sustainable transport infrastructure can help improve accessibility. In addition, improving the availability of information for those with mobility impairments of all types, ensures equitable travel options. The pilot “connectivity tool” offers real potential here and we look forward to engaging with the Department on how this is further developed and rolled out into use as part of the changes to the National Planning Policy Framework.
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3. How could technology be used to improve the transport network?

Technology has a key role to play in the delivery of many of the key integrations we highlight in our answer to question one. Some specific examples could include:

- **Smart Infrastructure and proactive digital wayfinding:** Deploy IoT-enabled infrastructure for predictive maintenance, safety monitoring, and efficient use of transport assets. As noted above in our answer to question two, the use of digital wayfinding and a partnership approach with those providers to optimise the use of the network should also be explored.
- **Digital Integration Platforms:** Create unified ticketing systems and payment platforms that enable seamless travel across all transport modes and all areas of the country, starting in towns and city regions. Consider a new duty on local authorities and regional government to promote integrated transport solutions in locations most suited for their implementation (to start with), and resource them to enable delivery. Expand existing mobility as a service (MaaS) platforms to provide flexible, user-centric transport solutions across urban, suburban, and rural areas, incorporating shared and micro-mobility options. The current piecemeal approach to this is both ineffective and costly – there’s a clear role for the national government to set the pace here, building on pockets of innovation like London, and learnings from the Future Transport Zones. The recent example of extending contactless payment on the rail network outside London is a positive sign that there is appetite to break down the artificial barriers that stop the public from accessing the network, but this should go further to bring in bus and shared transport as well.
- **Autonomous Mobility:** There is a great opportunity for autonomous vehicles to disrupt transport service provision, in both positive and negative ways. The INTS

should give some thought to a proper policy framework to guide the gradual introduction of this technology in a way that maximises positive policy outcomes and reduces any unintended negative consequences.

4. How, if at all, would you improve the way decisions are made about the transport network?

- **Government must provide ambitious and progressive High-Level Objectives and Coherent Framework for delivery:** Develop a unified policy framework that prioritises sustainability, equity, and integration across all projects. This must become a key reference for LTPs and major schemes in the same way the NPPF is for Local Plans. We need a renewed emphasis on Local Plans as the key way of identifying, prioritising and delivering transport investment – effectively forming the Strategic Outline Business Case for a region’s transport investment pipeline. Consider the national adoption of effective local techniques for developing and assessing schemes, e.g. Healthy Streets approach in London.
- **Embed Data-Driven Vision-Led Transport Planning:** Use revisions to the NPPF to embed the use of alternative forecasting and scenario testing (e.g. reduced car use) into decision-making and appraisal to drive better sustainable transport outcomes. Expand this across the assessment of all business case work, with a strong focus on driving up the importance of the Strategic Outline Business Case and the need for this to comply with the objectives and vision of the INTS.
- **Spell out what good stakeholder engagement looks like:** Ensure ongoing consultation with communities, practitioners, and industry experts to shape policies and ensure buy-in. Improve the quality of Equality Impact Assessment and ensure they genuinely impact scheme design. Recent guidance from Active Travel England on this is an encouraging first step, however, more will need to be done to embed this in practice.
- **Funding and Capability Alignment:** Address skills shortages and provide consistent funding mechanisms to reduce reliance on short-term competitive bidding. There is a critical need to ensure there is adequate long-term (5yr+) funding – both revenue and capital - to deliver and maintain the changes we need to see delivered on the network in the coming years. TPS members have been encouraged by the recent approach taken to the City Region Sustainable Transport Settlements (CRSTS) and would like to see this rolled out further and wider to ensure all local authority areas are covered. In this, the devolution and local government reorganisation process represents an opportunity to empower new Mayoral Strategic Authorities to deliver a genuinely integrated transport approach. In particular, there is a need to recognise that there is a need for

revenue funding to support an ongoing programme of behaviour change to support network optimisation, and “activate” new sustainable transport infrastructure, on par with long-running road safety and public health efforts.

- **A sustainable transport “What Works” Centre** – Partly due to the environment of competitive funding streams, and partly due to the ad hoc nature of disseminating best practice in the sector, local and regional actors spend significant time recreating the wheel. A national “what works” centre covering all aspects of how devolved government can deliver sustainable travel outcomes would help drive up best practice, reduce costs and improve productivity.
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5. Any other comments?

- **Ensure a renewed Focus on Climate Resilience:** Embed climate adaptation strategies, such as infrastructure designed to withstand extreme weather, into all transport planning.
- **Learn from Global Best Practices:** Draw inspiration from successful international examples, like the Czech Republic’s integrated bus-rail interchanges and Berlin’s Jelbi MaaS platform. Understand the lived experience of devolved decision-making in Wales and Scotland in creating a more integrated transport policy and practice.
- **Recognise Transport as a Shared Responsibility:** Promote collaboration between public and private sectors, emphasising long-term societal benefits over short-term gains. Key Government Departments need to work together across their silos to achieve proper integration, e.g. transport and land use planning, transport and health.
- **Identify Apparent and Perceived Contradictions in Policy Approach:** Identify common areas where investment announcements and policies appear to undermine government prioritisation of vision-led transport planning, particularly support for major highway investments that will exacerbate car dependency, such as LTC. Acknowledge how the NNNPS and National Highways operational focus is currently misaligned with government policy intent. There must be an honest and open discussion with the transport profession if the government intends to achieve buy-in to its integrated transport strategy.
- **Clarify whether and when other promised guidelines (needed to support the ITS) will be published:** In particular, Pavement Parking consultation response, MfS 3 Guidelines, LTP 3 guidelines, TA guidelines, and a Transport Decarbonisation strategy. It should also clarify how it intends for RIS3 to align with the INTS.