



INTS@dft.gov.uk
By online survey

EEH Business Unit
c/o Buckinghamshire Council
County Hall
Walton Street
Aylesbury
HP20 1UA

Date: 20 February 2025

Dear Sir/Madam,

Integrated National Transport Strategy – Call for Ideas

England's Economic Heartland (EEH) is a Sub-national Transport Body (STB) with membership that covers the area from Swindon, through Oxfordshire, Milton Keynes and across to Cambridgeshire, and from Northamptonshire across to Luton and Hertfordshire. As the STB for the Heartland region, we welcome the opportunity to the call for ideas for the development of the Integrated National Transport Strategy (INTS).

England's Economic Heartland's existing transport strategy (and technical programme) has long put users of the transport system at the heart of our work. The INTS presents a real opportunity to put people at the centre of transport policy in way which is ambitious and innovative.

Throughout this consultation response we have highlighted key themes relating to integration which we would like to see included in the INTS document, alongside activities (process, funding and regulatory) and examples of specific schemes and opportunities where the INTS could make a real difference to how those projects could be better delivered.

EEH has welcomed engaging with the Department to facilitate the (upcoming) regional workshops as part of the development of the Integrated National Transport Strategy, to bring together stakeholders from across the region and ensure views are represented. A genuine discussion to help inform development of the strategy is welcomed, and we offer our support in providing data and information to help inform the strategy.

In accordance with the consultation engagement approach, Annex 1 of this letter is a copy of the online consultation response input we will be providing. However, we make the following overarching comments.

- EEH are supportive of the development of a strategy which puts transport users at the forefront of funding decision making, policy development, and prioritised integration of modes and processes which delivers a single transport system.

- The transport system needs to be user focused – transport users do not see different tiers of roads or different public transport providers. Residents want to make journeys that are easy, convenient and affordable and will base their choices on these factors
- Our approach as an STB is multi modal, meaning a strategic view of the transport system can be considered. An approach which looks toward achieving the right outcomes, regardless of mode is welcomed.
- The strategy should look toward the outcomes for the transport system – how to better connect people in way which improves access to jobs, education and healthier communities. Integration of the transport system as a whole, through the concept, decision making, construction or design and to service delivery, is vital if we are to achieve genuine change. Merely addressing surface level issues will not achieve the same outcome. To that end, EEH is supportive of a revision to the transport appraisal process to ensure a wide range of positive outcomes for communities and the users of the transport system are valued in the appraisal process alongside the importance of the traditional 'business' case of a scheme.
- Information provision and collaborative working is key to enabling a joined-up transport system – this is applicable at all levels; within industry to enable elements such as timetable planning and multi-modal approaches; within the technology sector for enabling and innovative solutions and, importantly, for the end user to help them plan for the journeys they make.
- Local and Combined (Strategic) Authorities know their communities and the interventions which will be locally appropriate. Understanding the needs (and personas) of a community and matching transport intervention to need enables good decisions to be made for communities. Long term funding settlements, which are non-mode specific, for all authorities will allow for delivery of an integrated approach with decisions being made by those who understand the local need and communities they serve.
- Existing limitations in cross departmental represent a major barrier to enabling a transport system which works; decisions made in health or education impact the transport choices of residents.
- There is a move in national policy towards a vision led approach, such as within revisions to the NPPF – the INTS should mirror the change in direction to be vision led.
- Services and infrastructure must form part of the approach to the Integrated National Transport Strategy, for both fiscal and service provision factors.
- Organisations should work together in the technology and innovation arena to ensure lessons learned are shared and there is consistency in approach across networks.
- The principles of an 'integration and people centred approach' should be mirrored within all DfT guidance, including the forthcoming Local Transport Plan (LTP) guidance.
- The differences between place types should be considered in the development of the INTS. For example, the EEH area is characterised by polycentric geographies and solutions to the challenges faced may not be the same as those for urban areas – these differences must be acknowledged in the strategy.
- Funding and capacity will be key to enabling meaningful change based on the INTS strategy. DfT must recognise that Local Authorities will require the funding and capacity to deliver their transport strategies.

We look forward to continuing to work with the Department for Transport in the development of the Integrated National Transport Strategy, including the regional roadshow in the EEH region.

Yours sincerely



Naomi Green

Managing Director, England's Economic Heartland



Annex 1: Anticipated key themes in response to the Government 'Integrated National Transport Strategy call for evidence' – due date 30th January

In your opinion, how could the transport network be better 'joined-up'?

There are a number of 'layers' in which the transport network should be joined up; practically a user will want an easy way of making a journey that is joined up, reliable, convenient and affordable; a transport operator will want systems that will enable them to undertake journeys in a reliable way (for example, the impact of traffic will have a knock on effect on bus journey times); and for scheme promoters and deliverers they will want certainty over funding to deliver the outcomes needed in a system which is easy and timely to navigate. For Government, join up across Departmental decision making is vital: a decision on the way schools or health provision is designed can have a profound impact on the transport system. It is for this reason that the areas of focus below are wide ranging.

Ultimately, the transport system needs to be user focused – transport users do not see, for example different tiers of roads or different public transport providers. Residents want to make journeys that are easy, convenient and affordable and will often base their choices on these factors. Currently someone wishing to make a journey by public transport may need to refer to numerous sources of information, experience timetables which aren't aligned and services which are unreliable. The resulting impact is that for those with access to a car it is often the most convenient mode of transport. Those without access to a car can experience prolonged, dis-jointed journeys – leading to inequality in access to services people want and need. The Department for Transport journey time statistics in areas such as England's Economic Heartland, which are polycentric in nature will often see large disparities in accessibility by car and public transport.

To enable an integrated transport system whole scale change is needed with the way transport is planned, funded and delivered. However, there are also some quick wins (quick wins are listed later within this response).

To provide an integrated transport system at the earliest opportunity in the development process, a system which places infrastructure delivery first is crucial. The delivery of truly sustainable development is currently hindered by a mismatch in the level of certainty ('commitment') of a scheme and plan making – for example, only once a rail station has been fully committed can a Local Plan take into account the scheme. Major transport, such as rail, can take decades to plan and deliver and therefore there will always be a mismatch in process and timescales. Funding for infrastructure first is critical to align transport and land use planning. Local Authorities find it challenging to have the funding to forward fund infrastructure ahead of development, often leading to piecemeal approaches, which are challenging in terms of integration.



To provide certainty, funding for integrated transport solutions must match the ambition set. Funding for transport is based on modally specific funding bids, and often needs to be supplemented by other funding pots (such as Housing Infrastructure Fund), which mean that the funding picture for major transport can be complex and that the delivery of a transport strategy (and associated vision for transport) can be piecemeal. Long term funding settlements, which are non-mode specific, would allow for delivery of an integrated approach with decisions being made by those who understand the local need and communities they serve. Capacity and capability for Local Authorities to progress and delivered interventions, alongside a review of the way funding is delivered, should be a priority. STBs are currently developing Centres of Excellence, which provide resources, training and an evidence base – these could be expanded, with the right funding, to support partners.

In addition, there should be funding for interventions which enable connectivity to, or the use of, major infrastructure schemes. For example, funding for major highways or rail schemes must embed provision for first mile last mile (schemes/interventions/services) as part of their core schemes, rather than an add-on to enable people to be able to easily connect to their 'middle mile' journeys. A new piece of infrastructure which is not built with door-to-door connectivity at the heart risks users not being able to access or use services. East West Rail will be transformational to the EEH region, but without door-to-door connectivity being well planned (and crucially funded), a massive opportunity for wholesale change will be missed. East West Rail provides a rare opportunity for the principles of the INTS to be embedded from the outset of the scheme – to provide high quality door to door services from the outset - and it would be inconceivable that a scheme of this opportunity would not be developed in line with these principles. Our transport strategy sets out the need for active travel and public transport connectivity to new strategic transport infrastructure to enable whole scale change and maximise the benefits of a scheme.

There are more practical level actions, which could aid integration of modes and support those developing schemes. Design guides should align to enable integration across modes. For example, where active travel and public transport are part of an overall scheme, how can both be enabled in the optimal way in different place types?

In considering integration, the role of freight must also be given regard. Freight plays an important part in delivering the goods people need to live and has a significant impact on how the network operates. EEH's transport strategy outlines a desired move from road to rail freight for strategic freight movements, where appropriate, to reduce the high number of HGVs that travel from ports in the south and east accessing the midlands. Investment decisions, committing to upgrades to Ely Junction is a rail solution to a roads problem; it is estimated that by upgrading Ely junction 2,900 extra freight services would be able to operate to and from Felixstowe per annum, removing 98,000 lorry journeys off the road every year, reducing congestion by 5.6 million hours, and cutting carbon emissions by 1.7 million tonnes over 60 years. The outcome of interventions must be looked at holistically rather than modally specific.

Locally the impact of freight on communities should also be a key consideration when considering integration. For example, do diversionary routes impact communities or do journey planning apps take into account appropriate routing for freight, or is there an opportunity to provide consolidation centres to provide alternative last mile delivery opportunities reduce HGVs in cities and towns. There are a number of ways which freight needs to be considered within the integration of the transport system – just a few considerations are highlighted above and it is important that the approach to integrating freight is not forgotten as part of the INTS.

Information provision and collaborative working is key to enabling a joined-up transport system – this is applicable at all levels; within industry to enable elements such as timetable planning and multi-modal approaches; within the technology sector for enabling and innovative solutions and, importantly, for the end user to help them plan for the journeys they make (please also see response to Q2 of the consultation).

Comparatively 'simple' yet hugely impactful action and intervention such as accessible access to stations, simple public transport timetables and integration of services should not be underestimated. Users will notice improvements such as these and they should be automatically considered in planning of transport systems.

Data in the context of the next question can mean having better information about journeys, such as but not limited to departure times, journey planning, traffic information and accessibility information.

How could data be used to improve the transport network?

Transport users want simple, clear, easy to find information. They will not want to use lots of different systems; information about transport choices for a whole journey needs to be accessible and readily available in one place and information must be accessible for all, in both physical and digital forms.

In addition, where users are making a journey, they will expect the same type and level of information across the whole journey. For example, when making a journey on the rail network, users will expect to find a similar level of information about onward journeys at stations.

The sharing of transport data, where appropriate, should be encouraged in order to allow for better planning and integration. Challenges around commercial sensitivity, for example, relating to bus patronage has often made bus data difficult to obtain for Local Authorities and STBs. This data would be helpful for transport planning purposes. Similarly sharing of freight data especially commercial data is a challenge in looking at opportunities for integration and optimising routes reducing empty back haulage.

There should be deeper integration of systems and data between organisations in order to better mitigate both planned and unplanned network disruptions and aid the effective deployment of diversionary and alternative routes. This data and approach would enable better strategic transport planning of the transport system. Many STBs have an ever-evolving regionally focused evidence base of data and information. EEH share our evidence base with partners and stakeholders and would be pleased to extend this to the INTS team if required.



Technology in the context of the next question means new and innovative ways to complete journeys, for example but not limited to the use of autonomous vehicles, electric scooters and e-hailing rides.

How could technology be used to improve the transport network?

EEH is a region that thrives on innovation and is home to high number of innovation clusters and R&D jobs. It is a region where new mobility solutions have been tested for the first time and are currently being trialled: Autonomous busses and delivery vehicles in Milton Keynes and Cambridge and eVTOL air taxis in Cranfield and Oxfordshire. Innovation, in conjunction with traditional modes of transport provide users extra choice of options. One mode does not always fit all, and as such we are supportive of new innovative modes being piloted and integrated as appropriate.

Different place types will benefit from different technologies such as e-scooters, largely because of the build urban form and demographic: e-scooters and e-bikes have been particularly popular with younger people and in urban centres -and can be viable for a whole journey or as a first mile last mile solution.

Cannibalisation of demand does need to be considered: The impact on the business model for MRT of dockless scooters and e-bikes is not to be underestimated –particularly across polycentric localities where operators often rely on urban services to enable the delivery of less profitable rural routes.

To aid innovation, infrastructure and the enabling ecosystems surrounding it must be flexible and adaptable to change (where appropriate). Guidance and regulation to must facilitate testing whilst maintaining a safe environment for all users. A regulatory “sand Box” approach is encouraged but the balance required needs to be carefully considered.

Whilst supportive – we believe that fixing the foundations should be a priority. Getting data standards right and developing commonality across the methodologies used to understand the impact of new modes/policies and approaches is more important at this point.

Organisations should work together in the tech and innovation arena to ensure lessons learned are shared and there is a consistency in approach across networks. For example, if National Highways were to apply an innovative approach to data provision across the Strategic Road Network, can this practically and safely be applied on the Major Road Network?

As a more immediate approach, opportunities to make best use of existing infrastructure should be maximised, including smart junction technology to help aid network flow.

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

Decisions about transport should be outcome based, thinking about alignment with the vision set, and the needs of the users. To aid integration of systems, the solution should not be looked at in terms of a mode specific solution, but which solution fits the needs of the transport users. Lessons could be learned from existing multi modal studies such as the joint work between Solent to the Midlands, but recommendations of the studies must also be implemented.



Local Authorities know their communities and the interventions which will be locally appropriate. Understanding the needs (and personas) of a community and matching transport intervention to need, enables good decisions and good plans to be made. Long term funding packages are crucial for the delivery on an integrated transport system. Transport users do not see boundaries; consideration of integrated cross border movements will be important – Sub National Transport Bodies are already working regionally on multi-modal studies which look across borders.

The business case process is time consuming and costly, and the methodology applied within Transport Assessment Guidance (TAG) is traditionally skewed towards elements such as journey time reductions. The strategic case should remain an important part of the narrative of why a scheme is required and the process should be streamlined in time and approach to make best use of professional judgement, aided by evidence.

There should be acknowledgement that different approaches are appropriate for different place types. There is a challenge around rural mobility, with the solutions being different to those in built up urban areas. The way of assessing rural schemes should also be considered – for example, active travel solutions in rural and market town areas may look very different to those in urban environments.

Importantly lessons learned (both good and bad) of scheme implementation should be captured and retained by DfT to inform future decision making and scheme delivery. This could consider how integration was approached, if it has been successful and what could be done better. Monitoring and evaluation of schemes is critical, but again specific funding for M&E is required to ensure there is resource to undertake this activity.

Any other comments?

Sub National Transport Bodies have adopted regional Transport Strategies, which set out the long-term strategic vision for transport for each region. These strategies must be reflected in the development of the INTS, taking on board the approach of STBs looking across modes.

There is an opportunity for the INTS to make a real difference to how projects might be better delivered – such as how bus services can be supported or planning and single integrated transport system around East West Rail. It is essential that projects such as East West Rail are supported by strong door-to-door connectivity, enabling the maximum amount of people to access services as possible.

When delivering major projects, there should be integration and flow of information across organisations with strong project management and clear communication so that there is alignment; which may reduce the potential for project delay and disruption, such as those seen at Oxford Station.



Cross departmental working will be crucial to enabling a transport system which works - decisions made in economic development, health or education, impact the transport choices of residents for generations. For example, centralisation of health services may mean that people are having to travel further, and with more complicated journeys. In support of East West Rail, EEH has been working for some time with business led organisations such as the Science Supercluster and the regions' universities. Through these strategic alliances, EEH is able to tighten the links between transport delivery and business need – not just for local schemes but where large, transformative infrastructure is being delivered.

Services and infrastructure must form part of the approach to the Integrated National Transport Strategy, for both fiscal and service provision factors. Infrastructure can take many years of planning, development and delivery and both elements must be taken into account and complement each other.

The importance of clear information cannot be underestimated: centrally developed APIs or simple, co-ordinated places for information on travel, including information on integrated ticketing options would reduce confusion.

Finally, behaviour change should be considered as part of the development of the strategy – people will not change their behaviours unless the options available to them are attractive and there are benefits to them shifting their travel patterns. This requires a whole scale change of the approach to planning and delivering transport.

Overall, STBs are well placed to support with the development of the INTS, with their existing regional transport strategies, evidence bases and existing relationships with stakeholders. We look forward to working with the DfT on the development of the strategy.