

# Highways England's 'The Road to Growth' discussion paper on the emerging Strategic Economic Growth Plan

## Draft Response from Kent County Council

This is Kent County Council's (KCC) response to Highways England's "*The Road to Growth*", strategic economic growth plan discussion paper. Highways England made a public commitment to produce a Strategic Economic Growth Plan and this discussion paper outlines what is to be covered in the plan when published in 2017. KCC has outlined its position on each of the major discussion points that will be included in the plan and has outlined Kent specific projects on the Strategic Road Network (SRN) needed to support economic growth. Examples include a new Lower Thames Crossing, a solution to Operation Stack and various motorway junction improvements.

This discussion paper will influence the way Highways England work and invest, and will inform Route Strategies and their advice to government for the Road Investment Strategy 2 (RIS 2) as well as their 2050 vision for the strategic road network. KCC has therefore given a comprehensive response to this consultation and generally agrees with Highways England's approach to supporting economic growth through the SRN.

### ***1. Do you agree with the areas of research we have focused on to better understand the relationship between the strategic road network and economic growth on page 6 — 16?***

#### **1. Economic growth and the strategic road network**

**Agree** with the approach to exploring the relationship between transport investment and economic growth and its impact on productivity, investment, trade and unemployment.

The majority of large settlements in Kent are located along or close to the Strategic Road Network (SRN), mainly the M20 and M2/A2 corridors; therefore Kent residents and businesses rely heavily on the SRN for daily life.

Freight transport volumes through Kent are disproportionately higher than other parts of the SRN due to Kent's strategic location as UK gateway. The report highlights the cost of congestion to the freight industry will be "14 billion" in 2040 from a sector that provides 9% GDP. As well as this "24% of businesses cite the quality of connections to international gateways as a barrier to exporting." These statistics therefore

heighten the need for improvements to the A2 on approach to Dover to relieve congestion and provide increased resilience and capacity. Essential improvements to the A2 include:

- A2 Lydden dualling and dualling of a number of single carriageway sections on approach to Dover;
- M2 J7 Brenley Corner improvement to increase capacity and provide free flow between the M2 and A2;
- A2/A258 Duke of York roundabout improvements.

The existing provision at the Dartford Crossing is stifling growth and restricting trade between the South East and the Midlands and North as well as more locally between Kent and Essex. The Dartford Crossing is heavily used by freight vehicles with more than 70,000 freight vehicles using the Dartford Crossing each day and 70% of all Heavy Goods Vehicle (HGV) traffic from Dover and Eurotunnel using the crossing. KCC has 'bifurcation' as a strategic priority, i.e. the splitting of traffic to and from Dover, between the M20/A20 and M2/A2 corridors. In addition to a new Lower Thames Crossing, bifurcation requires a number of improvements on the A2 to deliver a high quality strategic corridor that will cater for the significant growth planned at Dover, and Calais which is set to double in size, as well as accommodating general traffic and freight growth. DfT forecasts HGV volumes will grow by 43% and Light Goods Vehicles (LGVs) by 88% by 2035. In addition Government forecasts growth in Roll on Roll off (RoRo) traffic will grow by 101% by 2030. This would equate to 3.8 million HGVs using Dover with around 1.3 million of these using a new Lower Thames crossing.

A new Lower Thames Crossing will also enable regeneration in the Thames Gateway area allowing up to 160,000 houses and 225,000 jobs across Kent and Essex. Current congestion on the existing crossing along with forecast traffic growth and the significant scale of potential development makes additional crossing capacity a top priority to ensure growth is not constrained in both Kent and Essex and the area delivers its full potential for the local and national economies.

## **2. Commercial development and the strategic road network**

**Agree** that access to transport is a key locational factor that can influence the industrial, office, residential, retail and property markets.

The UK commercial property market delivered a total return of 13.1% (MSCI Index) in 2015. This is mirrored in Kent and Medway where an average of over 10,500 dwellings is to be built each year until 2031. Figure 3 on page 8 of the paper shows the relationship between the SRN and property market performance and shows

Dartford/Gravesend, Medway and Maidstone as having the largest volumes of industrial developments, all of which along the M20 and M2/A2 corridors.

Similar to the multi-modal facility in Daventry as referenced in the report, there are proposed plans for a rail freight interchange at Howbury on the Kent/Bexley border which will encourage modal shift. The location of this interchange is close to the SRN at Junction 1a of the M25/A282. The Transport Assessment for the site states trains serving the site will be a mix of cross-Channel services reducing HGVs numbers through the Channel Ports and also trains serving ports and interchanges in the Midlands and North. An intermodal freight train can remove between 43 and 77 HGVs from the strategic road network per train. Howbury will be able to handle up to 7 trains a day which equates to 300 – 540 HGV long distance movements being removed from the SRN.

Existing transport provision at the Dartford Crossing is stifling growth in the South East acting as a barrier between counties north and south of the Thames. A Lower Thames Crossing would improve links between major growth areas in Kent and Essex.

### **3. International gateways and the strategic road network**

**Agree** there should be a detailed analysis of key UK ports and airports with a specific focus on access, demand analysis and connectivity issues.

On average 10,800 HGVs cross the Strait of Dover each day (5,400) in each direction. The Port of Dover is the busiest Ro-Ro and passenger port in the UK and has plans for expansion at its Western Docks to accommodate future freight demand volumes.

Freight traffic through the Channel Ports brings positive economic and social benefits to Kent and the UK as a whole. There are however operational issues and negative impacts of freight traffic to the county of Kent.

An alternative solution to Operation Stack is strategic priority for Kent as set out in our draft *Local Transport Plan 4: Delivering Growth with Gridlock (2016-2031)* and *Kent's Freight Action Plan*. KCC supports Highways England's plan for permanent lorry area with provision to hold up to 3,600 HGVs. The impacts of Operation are felt across the whole county as Kent's residents and businesses struggle to get to work, school, medical appointments and carry out everyday tasks. The cost of Operation Stack to the Kent and Medway economy is estimated at £1.45 million per day and the Freight Transport Association estimate a cost of £250 million per day to the UK economy as a whole.

A further impact of the high freight traffic volumes travelling through Kent is the provision for overnight lorry parking. HGVs are required to take both daily driving breaks and overnight rests. There is a severe shortfall of official lorry parking spaces in the county which leads to inappropriate and in some cases dangerous parking. The negative impacts of this parking are lorry related crime/thefts, road safety, damage to roads, kerbs and verges, environmental health issues (human waste), litter and noise disturbances, especially when close to residential areas. KCC conducted surveys in June and September 2016 into the volumes of inappropriately parked HGVs in the county and found that on average there was 500-800 vehicles parked inappropriately per night. KCC therefore hopes to work with Highways England, DfT and other relevant stakeholders to look into the potential of constructing lorry parks across Kent to alleviate this problem. KCC would like to emphasise the importance of Highways England constructing the 500 space overnight parking facility within the Operation Stack lorry area to provide much needed lorry parking in Kent.

As well as the Channel Ports mentioned above, Sheerness Port on the Isle of Sheppy is also a major UK port and served by the SRN by the A249. The Port of Sheerness imports and exports vehicles, containers, dry bulks, and metals as well as refrigerated produce for transshipment. It is also one of the UK's leading car-handling terminals, with around 400,000 vehicles crossing the quay each year. Sheerness Port is therefore a strategic freight port for both the South East and UK.

KCC supports Highways England's proposal for the implementation of a variable speed limit for the Dover Traffic Assessment Project (TAP) scheme currently in place, to hold port bound freight on the A20 on approach to Dover. TAP has been very successful in reducing congestion in Dover town as well as mitigating the need for Operation Stack to be implemented when there has been limited disruption at the port. KCC fully supports Highways England's plan for a permanent solution with variable speed limits to allow for improved journey times along the A20.

#### **4. Socio-economic analysis, future forecasts and strategic road network**

**Agree** that it is important to identify the sectors that are most reliant on the SRN and provide local area growth forecasts for those sectors.

Logistics/freight, manufacturing and wholesale industries are encouraged to locate close to the strategic network. This allows for both freight movements/deliveries and employees to have easy access to the SRN. The downside of this however is that public transport provision is often limited in these locations which lead to employees traveling to work by car.

“To effectively manage the routing of HGV traffic to ensure that such movements remain on the strategic road network for as much of its journey as possible” is a key

action set out in *Kent's Freight Action Plan*. Strategically locating logistics, warehousing, manufacturing and warehousing industries close to the SRN reduces the conflicts between HGV traffic (noise, vibration, litter etc) and residential areas.

## 5. Assessment of growth impacts – specific lessons from case examples

**Agree** that it is important to assess existing schemes to help evaluate the economic impact of SRN schemes.

KCC has worked with Highways England alongside local Planning Authorities as well as other key stakeholders to create our draft Local Transport Plan 4 and the Growth and Infrastructure Framework (GIF).

### Draft Local Transport Plan 4 (LTP4): Delivering Growth without Gridlock (2016-31)

KCC's draft LTP4 outlines large scale Highways England schemes as strategic priorities as well as district priorities which may impact upon the SRN.

Relevant Strategic Priorities:

- Enabling growth in the Thames Gateway
- New Lower Thames Crossing
- Port Expansion
- A Solution to Operation Stack
- Bifurcation of Port Traffic (from associated highway improvements)
- Provision of Overnight Lorry Parking

Relevant District/Borough Council Priorities listed in the consultation draft LTP4:

<b>District</b>	<b>District/Borough Council Priorities for the HE Network</b>
Ashford	M20 Junction 10a
Canterbury	Wincheap A2 off slip New A2 interchange at Bridge
Dartford	Improvements or new bridge at M25/A282 Junction 1a A2 Ebbsfleet junction improvements A2 Bean junction improvements including a new bridge
Dover	A2/A258 Duke of York roundabout improvements A2 Lydden to Dover improvement
Gravesham	
Maidstone	M20 Junction 7 improvements M20 Junctions 3-5 'smart' or managed motorway system
Medway	
Sevenoaks	M26 capacity improvements through use of 'smart' or managed motorway system
Shepway	South of Hawkinge A20/A260 Junction improvements Upgrades to M20 Junction 11

Swale	Improvements to M2 Junction 5 A249 corridor capacity enhancements to support growth A249/Grovehurst Road Junction Improvements to M2 Junction 7
Thanet	
Ton & Mall	M25/M26 east facing slips to alleviate movement restrictions M20 Junctions 3-5 'smart' or managed motorway system
Tun Wells	Dualling the A21 between Kippings Cross and Lamberhurst

### Growth and Infrastructure Framework (GIF)

KCC and Medway's Growth and Infrastructure Framework (GIF) can be found at [kent.gov.uk/gif](http://kent.gov.uk/gif) and outlines the housing and economic growth planned to 2031 in Kent and Medway and the infrastructure needed to support this growth. This GIF projects 158,500 housing units across Kent and Medway between 2011 and 2031.

The GIF also goes into detail on what transport infrastructure is required to meet this housing growth. On the Strategic Road Network this includes:

- A long-term solution to Operation Stack is required to reduce the impact on local residents and businesses on the M20 corridor.
- Delivering Lower Thames Crossing should be a priority to relieving congestion at Dartford, facilitating growth across the north Kent Thames Gateway and addressing issues relating to continental traffic.
- Improvements to both the A2/M2 and M20 corridors will be required to address local capacity issues and facilitate growth.
- Improvements to the A21 corridor will bring benefits to both West Kent and East Sussex.
- Improvements at Dover will be required in association with redevelopment of the Western Docks.
- Growth south of Ashford will require new highway connections and improvements to the M20 Junction 10.
- Growth at the Port of Dover and Whitfield will require improvements to the A2 and A20 and this will need to be funded through developer contributions and Highways England.
- Growth within the Kent Thameside area will require significant improvements to the highway network, tied to the development that comes forward in this area.

Large scale schemes such as a new Lower Thames Crossing are extremely expensive and time consuming through the consultation, planning and design stages before construction can start. It is important for Highways England to make sure that schemes are almost over engineered to be able to cope for demands in 40+ years'

time. An example of this is confirmation that the new Lower Thames crossing will be a 3 or 4 lane route in each direction rather than the currently proposed 2 lanes.

## **6. Economic value of the strategic road network**

**Agree** with looking into the user costs to estimate the lifetime economic value of the SRN.

Figure 8 in the report shows the M20 around Maidstone, the M2 around Gravesend/Dartford and the M25/A282 around Dartford as having the highest user-cost figures. Again to reiterate the Dartford Crossing suffers from consistent delays already operating at or past capacity which therefore increases the user cost to residents and visitors to Kent.

### ***2. Do you agree with the vision we have articulated on page 4?***

**Yes**, agree that the strategic road network will play a central role in contributing to UK prosperity.

Kent has a high dependency on car ownership with 80% of households in the county having access to one or more cars. This reliance on the car for people movements and access to jobs, education etc means that the SRN plays a big role in keeping Kent moving and connected. An example of this is the disruption caused across the county when Operation Stack is implemented. Kent has good rail connections throughout the county however these are mainly London centric and therefore road based commuter trips between Kent towns are common.

The number of goods vehicles travelling between Great Britain and mainland Europe has increased by 84% in the last 20 years. This increase in freight volumes has not been met with required highway improvements on approach to the ports. An example of this is the A2 between Dover and Lydden which is still a single carriageway road.

The road freight industry is worth £74bn to the UK economy per annum and the Channel Ports play a vital role in this prosperity. Last year over 2 million HGVs entered Kent through both the Port of Dover and Eurotunnel and the Department for Transport Road Traffic Forecasts (2015) predict a 22% increase in HGV movements between 2010 and 2040. This aligns with The Port of Dover and Calais' expansion plans, all of which will require highway improvements to the SRNs serving the ports.

### ***3. Do you agree with the strategic economic roles for Highways England that we have articulated on page 17 — 18?***

## **1. Enabling international connectivity and trade by providing improved access routes to global markets.**

### **Agree.**

There are a number of highway improvement schemes needed in Kent to support economic growth and access routes to the Channel Ports. Alongside the proposal for a new Lower Thames Crossing, KCC has a strategic priority for the bifurcation of port traffic to split demand along the M20 and A2/M2 corridors. This priority also aligns with the planned expansion at the Port of Dover Western Docks. These improvements include:

- A2 Lydden dualling and dualling of a number of single carriageway sections on approach to Dover;
- M2 J7 Brenley Corner improvement to increase capacity and provide free flow between the M2 and A2;
- Permanent variable speed limit along A20 for Dover TAP.

There is a current development in the planning process for a Strategic Rail Freight Interchange at Howbury on the Kent/Bexley border. Highways England has been working with KCC and the local planning authorities at Bexley and Dartford to make sure that any impacts of this multi-modal facility are mitigated on the local and strategic road networks and work to support modal shift.

KCC supports Highways England's plans for a solution to Operation Stack as the current disruption causes a major disturbance to residents and visitors to Kent. It is also essential that the facility also allocates 500 spaces of the 3,600 capacity lorry area for overnight lorry parking as demand for lorry parking far outstrips supply in Kent.

A new Lower Thames Crossing would improve connectivity between the Dover ports and the Midlands and North. 70% of all Channel Port freight traffic uses Dartford Crossing. This puts even greater emphasis on the need for a Lower Thames Crossing between Kent and Essex.

The port of Sheerness an international port located on the Isle of Sheppy in Kent. The port does not have a dedicated rail link so is served solely by the A249. To facilitate and improve vehicle movements to the port alongside planned growth around the town of Sittingbourne, M2 Junction 5 improvements will be needed.

## **2. Supporting business productivity and competitiveness by facilitating safe, reliable and efficient journeys, and by meeting the needs of those sectors most reliant on the SRN.**



## **Agree.**

Journey time reliability, road safety and journey efficiency are all important for both businesses and residents in Kent to go about their day to day business in a timely and safe manner. There are a number of SRN schemes in Kent that would achieve these objectives:

- M20 junctions 3-5 smart motorway will improve journey time reliability on a congested part of the network which suffers specifically in the peak.
- Dualling the A21 between Kippings Cross and Lamberhurst should reduce journey times and accidents and ensure people can get to work safely, reliably and efficiently.
- New Lower Thames Crossing.
- M25 junctions 1a and 1b improvements.

### **3. Facilitating the sustainable delivery of new homes and employment spaces, while balancing local and national SRN demand and supply.**

## **Agree.**

As outlined in more detail in the answer to Question 1 the GIF identifies a need for 158,500 housing units in Kent over the next 20 years. To achieve this growth adequate provision will have to be made available on the SRN to cope with the increased traffic movements associated with the developments. Examples in Kent of highway improvements needed to unlock development from the SRN are:

- A2 off slip and roundabout at Wincheap will unlock housing potential in the east of Canterbury (funding for this scheme was bid for through Highways England's Growth and Housing Fund and a decision is still awaiting).
- M20 Junction 10a will unlock housing potential in the south of Ashford and will reduce existing congestion at Junction 10 (the scheme is currently progressing through the National Strategic Infrastructure Project (NSIP) planning process).
- A2 Ebbsfleet junction improvements and A2 Bean junction improvements including new bridge will be needed to unlock housing potential around the Ebbsfleet Garden City development (this scheme is committed in RIS 1).
- A2/A258 Duke of York roundabout improvements will facilitate developments around Whitfield and Dover.
- A249 corridor capacity enhancements will be needed to support growth in and around Sittingbourne.

**4. Do you agree with our categorisation and definition of economic opportunity areas, on page 19 — 22?**

**Agree.**

Kent is home to a number of economic opportunity areas, and we look forward to understanding how this opportunity for growth is captured in the plan.

**Table 1 – fundamentally dependent**

**Agree** with this. In our *Freight Action Plan for Kent* we have a key action “To effectively manage the routeing of HGV traffic to ensure that such movements remain on the strategic road network for as much of its journey as possible”. In Kent the majority of HGV traffic is generally travelling to and from the channel ports or Sheerness. There is also a more sporadic distribution of HGV traffic serving the large agricultural industry in Kent. This is particularly relevant when considering the physical impact of HGVs on the road infrastructure as well as noise and impact on communities etc. In Kent the Channel Ports and Port of Sheerness are fundamentally dependent on the SRN.

**Table 2 – reliant**

**Agree** that major employment areas should also be close to the strategic road network for easy access to housing areas as well as mixed employment and tourism destinations. In Kent there are proposals for the Paramount Park development near Gravesend which will attract major visitor numbers from across the UK and Europe as well as a large demand for commuter trips. Other major trip generators in Kent are Bluewater Shopping Centre and Ashford Outlet which are also both located close to the SRN.

**Table 3 – Interdependent**

**Agree** the majority of large settlements in Kent are located close to the Strategic Road Network mainly along the M2 and M20 corridors. These towns have large populations and large employment centres which become congested in peak times. The five largest settlements in Kent in terms of population are:

<b>Settlement</b>	<b>SRN</b>
Maidstone	M20
Gillingham (Medway)	M2
Dartford	M25/A282/A2
Chatham (Medway)	M2
Ashford	M20

**5. Do you agree the two-perspective approach to prioritising economic growth locations around the strategic road network, as set out on page 23?**

**Agree.**

**Economic significance**

KCC believe that the following areas should be considered with regards to their economic significance of the SRN:

- Port of Dover and Eurotunnel
- Dartford Crossing/new Lower Thames Crossing
- Port of Sheerness

**Dependency**

The Channel Ports have a dependency on both the A20/M20 and A2/M2 which is evidenced when Operation Stack is in force. Operation Stack causes countywide disruption when in place as it queues HGVs back along the M20. With 10,800 HGVs using the Channel Ports each day (5,400 each direction) the Channel Ports are dependent on the SRN.

**6. Do you agree with our emerging approach on page 24?**

**Agree** that partnership working is the way forward to supporting economic growth. The four strategic economic roles have already been critiqued in Question 3. In terms of the areas Highways England are planning to explore:

**Agree** with “**strengthening inter-modal transport connectivity to manage transport demand and supply better**”. In Kent this can be evidenced through increased passenger modal shift at stations such as Ebbsfleet and Ashford along the HS1 line. With regards to freight increased road to rail modal shift should be encouraged which aligns with the development proposals at Howbury.

**Agree** with “**improving movements to and from international gateways**”. In Kent this includes improvements to the approaches to the Channel Ports and aligns with our strategic priority of the bifurcation of port traffic:

- A2 Lydden dualling and dualling of a number of single carriageway sections on approach to Dover;

- M2 J7 Brenley Corner improvement to increase capacity and provide free flow between the M2 and A2;
- A2/A258 Duke of York roundabout improvements;
- Permanent variable speed limit along A20 for Dover TAP.

**Agree with “looking at how we can better support the future transport needs of those sectors currently relying most on the SRN”.**

HGV traffic which relies on the SRN has very limited official parking spaces for official drivers' hours breaks required to stay legally compliant. This has led to a lot of dangerous and inappropriate parking on hard shoulders and grass verges in Kent. KCC are currently working with Highways England, the DfT and other relevant stakeholders to assess the need and feasibility of lorry parks in Kent. KCC would like to highlight the importance of Highways England constructing the 500 space overnight parking facility within the Operation Stack lorry area proposals to provide much needed lorry parking provision in Kent.

Journey time reliability is essential to allowing Kent residents and businesses to make consistent and reliable journeys. Existing congestion pinch points on the network should be looked at such as the Dartford Crossing, the M20/A20 and M2/A2 corridors and other peak congestion on the network.

**Agree with “increasing joint working and partnership with bodies such as Network Rail, High Speed Two and local transport authorities”.**

KCC working together HE and other relevant stakeholders will help achieve the vision set out in this document. Increasing opportunities for modal shift from road to rail such as high speed rail and parkway stations should reduce the strain on the SRN.

***7. Do you have any further suggestions as to how we can work differently to better enable economic growth, (a link to a feedback form can be found), on page 25?***

**Agree with the statement of “we will consider options for maintaining, operating or enhancing roads, including on local roads where these may bring about benefits on the strategic road network”**

KCC would like to stress the importance of improvements to the local highway network as a result of large scale Highways England schemes. An example of this is the A229 Bluebell Hill, a route between the M20 and M2 and its narrowest point. The junctions around the M20 and M2 often queue back causing considerable congestion, especially in peak periods. These problems would be further exacerbated if a new Lower Thames Crossing was to be built as it is the shortest link

between the two corridors and is already used heavily by freight vehicles. Highways England should therefore consider mitigation measures around highway affected by large scale schemes being brought forward.

KCC would like Highways England to consider the following roads to be adopted and transferred over to Highways England as key strategic links between the M2 and M20. With KCC's strategic priority of bifurcation of port bound traffic coupled with planned port expansion and potentially a new Lower Thames Crossing these link roads will become more heavily used and strategically important for traffic travelling to the Channel Ports.

- A229 Blue Bell Hill (M2-M20 link)
- A249 Detling Hill (M2-M20 link)
- A228 Medway Valley (M2-M20 link)