



Department
for Transport

Appendix A: Draft Response by Kent County Council to the Department for Transport (DfT) Consultation: Shaping the Future of England's Strategic Roads (RIS2)

Shaping the future of England's strategic roads (RIS2)

Personal details

1. Are you responding as: *

- an individual? (Go to question 4 below)
- on behalf of an organisation?

Organisational details

2. Your organisation's name?

Kent County Council

3. What category best represents your organisation?

- Representative group
- Transport provider
- Highways England supplier
- National public sector body
- Local public sector body
- Local or combined authority**
- Local Enterprise Partnership
- Business
- Charity

Other organisation:

Initial report proposals

4. Do you think Highways England's proposals will deliver what users of the SRN want? *

Yes

No

Don't know

Different way

5. If you answered no, what could be done differently?

Kent County Council (KCC) supports Highways England's proposals in general; however, it does have concerns regarding the lack of reference in the *Initial Report* to future housing growth. With Kent and Medway required to deliver upwards of 158,500 new homes by 2031 (KCC and Medway's Growth and Infrastructure Framework (GIF), however the refreshed GIF, due to be published this year, indicates accelerated growth with an emerging figure of 178,600 new homes by 2031). This illustrates that growth expected in Kent is already high, but if the New Objectively Assessed Needs consultation goes through then it will be proportionally even higher in both Kent and the South East as a region¹. It is, therefore, imperative that a joined up agenda is adopted to ensure the Strategic Road Network (SRN) meets the needs of not just existing users but also future users generated from the substantial housing growth expected across the county.

Highways England proposes to improve journey times which KCC supports, but it will also be important to consider how this can be applied during times of disruption to the SRN, for example, when there are delays at the Channel Ports resulting in the use of Operation Stack.

Whilst not the responsibility of Highways England, the interaction with the Local Road Network is vital to the operation and overall journey experience of the travelling public, freight operators and businesses as all SRN journeys begin and end on the Local Road Network. KCC believes that Government should invest more in the roads generally (both local and strategic), and particularly in the maintenance of local roads. Fundamentally, KCC does not have sufficient funding to properly maintain the existing road network. KCC's work streams around highway asset management and the Department for Transport's Incentive Fund have reported the difficult news that Kent's road network is in a poor condition and will deteriorate significantly if current funding levels are maintained. This lack of funding threatens KCC's ability to fulfil its duty under the Highways Act to maintain a safe network. Furthermore, this impact is not confined to roads, but also to the accompanying footway network. The Government must increase funding for maintenance urgently to ensure there is a coherent Strategic and Local Road Network.

Initial report proposals

6. Do you think Highways England's proposals will deliver what businesses want? *

¹ https://bartonwillmore.carto.com/viz/c13dda8f-68a1-434c-b7a2-e5b73da2c5f7/public_map

Yes

No

Don't know

Different way

7. If you answered no, what could be done differently?

The majority of large settlements in Kent are located along or close to the SRN, mainly the M20 and M2/A2 corridors; therefore Kent businesses rely heavily on the SRN. Whilst KCC agrees with the overall proposals, we would like to make the following comments in regards to the needs of businesses in Kent, the wider South East and the UK as a whole:

Freight transport volumes through Kent are disproportionately higher than other parts of the SRN due to Kent's strategic location as a gateway to Europe – with or without Brexit. Highways England's previous '*Road to Growth*' report highlights the cost of congestion to the freight industry will be £14 billion in 2040 from a sector that provides 9% of GDP. In addition, 24% of businesses cite the quality of connections to international gateways as a barrier to exporting. These statistics demonstrate the need for improvements to the strategic routes to the Channel Ports, especially the M2/A2 which has inadequate capacity in many sections and at its key junctions. Enhancements are needed to relieve congestion and provide increased resilience for the M20/A20 route, especially with the delivery of a new Lower Thames Crossing which will create a new strategic route along the A2/M2 from the Port of Dover to the Midlands and the North.

The existing provision at the A282 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 identified 'bifurcation' of the SRN through Kent 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 at Calais (which is set to double in size by 2021), as well as accommodating general traffic and freight growth. In respect of the latter, DfT forecasts HGV volumes will grow by 43% and Light Goods Vehicles (LGVs) by 88% by 2035. In addition, Government forecasts that 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 significant growth in the Thames Estuary Commission Area of 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.

Along with the need to cater for greater volumes of HGV movements, there is a need to accommodate those increased volumes when there are delays at the Channel Ports. Currently, the response to such delay is Operation Stack – an unsustainable approach that effectively turns one of the motorways between the UK and Europe into a lorry park. As such, an alternative solution to Operation Stack is also a key strategic priority for Kent as set out in KCC's *Local*

Transport Plan 4: Delivering Growth with Gridlock (2016-2031) and the Freight Action Plan for Kent.

KCC supported Highways England's previous plan for a permanent lorry area with provision to hold up to 3,600 HGVs but notes no reference is made to a future solution to the issue within the *Initial Report*. The impacts of Operation Stack 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. Operation Stack also impacts on the Local Road Network in terms of damage to the road surface and accelerated asset deterioration. Therefore, it is imperative a solution to Operation Stack is delivered in order to provide a reliable SRN which meets the needs of businesses both within Kent and the wider UK, as well as internationally.

Initial report proposals

8. Do you think Highways England's proposals meet the needs of people affected by the presence of the Strategic Road Network? *

- Yes
- No
- Don't know

Different way

9. If you answered no, what could be done differently?

In general KCC agrees that Highways England's proposals meet the needs of people affected by the SRN. In particular, the noise, visual and air quality impacts have been actively considered in the *Initial Report* and this is of benefit. Nevertheless, the County Council would like to make the following comments:

- No consideration has been given to the impact of severance to communities affected by the SRN, in particular the impact of new schemes. This is especially important with the delivery of the new Lower Thames Crossing as KCC has made the case for more of the route to be in tunnel to minimise severance of existing communities as well as helping to minimise the noise and visual intrusion of the new road.
- Enhancements to the SRN should ensure local communities benefit from better connections and reduced congestion, along with greater connectivity to the Local Road Network. Hence, the impacts of SRN enhancements and how they affect the Local Road Network also need to be considered. Without a joined up network, door-to-door journey time improvements cannot be achieved. Ultimately, all SRN journeys begin and end on the Local Road Network.

Initial report proposals

10. Do you agree with Highways England's proposals for:

	Yes	No
the four categories of road and the development of Expressways (initial report sections 4.4.3 and 5.3.6)	✓	<input type="checkbox"/>
the operational priorities (initial report section 5.1)	✓	<input type="checkbox"/>
the infrastructure priorities (initial report section 5.2)	<input type="checkbox"/>	✓
the investment priorities (initial report section 5.3)	<input type="checkbox"/>	✓
a local priorities fund (initial report section 5.3.8)	✓	<input type="checkbox"/>
the future studies (initial report section 5.3.11)	✓	<input type="checkbox"/>
the designated funds (initial report section 5.4)	<input type="checkbox"/>	✓
the performance measures and targets (initial report section 6.3)	<input type="checkbox"/>	✓

If you said no to any, what could be done differently (referencing the topic)?

Four categories of road

KCC agrees with the proposal to concentrate on four categories of road and welcomes the development of Expressways as a higher quality form of the trunk roads. KCC would like to see the new Lower Thames Crossing become a flagship example of an Expressway, utilising modern technology to improve safety and the routing of traffic.

The *Initial Report* shows an indicative network over the medium term made up of smart motorways, conventional motorways, expressways, and all-purpose trunk roads, as well as options for further expressways (page 57). KCC supports the priority given to key routes in Kent that are currently stressed and will be closer to capacity from existing background growth levels over the course of RP2 – and even more so once the Lower Thames Crossing opens. The potential to convert the A2 from Canterbury to Dover to an expressway in future is particularly welcome as this section of trunk road is currently below the standard and capacity that a strategic route to the Port of Dover requires. The completion of the dualling and grade separation at junctions from Lydden into Dover is essential to make this a high quality route capable of carrying increasing traffic flows associated with the Lower Thames Crossing and Kent's role as an international gateway (including a high proportion of HGV movements). Similarly the A21 south of Tonbridge (heading into East Sussex) is of a far lower quality than the northern section of the route and increased investment is needed to bring it up to standard. The A259 from Brenzett in Kent heading into East Sussex is also a stark contrast to the rest of the SRN. It is of a markedly lower quality and consideration should be given to upgrading the route.

Smart motorway on the M26 will provide better levels of information to drivers as well as increased capacity, something that is a local priority in KCC's *Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031)*. KCC would like to see M2 Junctions 4 – 7 given smart

motorway status to maximise capacity on this two-lane stretch of motorway.

Operational Priorities

KCC would emphasise the importance of Highways England's proposals to further consider the management of traffic during times of routine maintenance on the SRN, in particular the need to minimise the impacts of diverted traffic to the Local Road Network (LRN). Roadworks should be carefully planned through engagement with Local Highway Authorities (LHA) to ensure diversionary routes are well signposted both on the SRN (via VMS signs) and LRN and additional traffic flow is mitigated, ensuring a high level of customer service and reduced impact on journeys.

Investment Priorities

KCC welcomes a new Lower Thames Crossing scheme being developed for the next road period; however, the substantial growth planned across Kent, especially in the Thames Estuary Commission Area, coupled with the new Lower Thames Crossing will add significant pressures to the M2/A2 corridor. Schemes need to be developed for the next road period for the A2/M2 corridor to complement the new Lower Thames Crossing. These schemes need to include an upgrade of M2 Junction 7 (Brenley Corner), dualling the A2 between Lydden and Dover and consideration for widening/all lane running along the M2 between junctions 4 and 7. Schemes also need to be developed to improve the connections between the M2/A2 and the M20/A20, including an upgrade of the A229 and its junctions with the M2 (Junction 3) and the M20 (Junction 6) – the initially proposed new Lower Thames Crossing Option C with 'variant'; and the A249 and its junctions with the M2 (Junction 5) and the M20 (Junction 7). These schemes would improve the resilience and capacity of the SRN to the Channel Ports and support the bifurcation (splitting) of port bound traffic between both strategic corridors (M20/A20 and M2/A2).

Given the strategic importance of these routes, they often carry large volumes of freight traffic and as a result require regular maintenance. The cost of maintaining these roads are substantial and add to the increasing pressure on KCC's budgets, and result in the authority being dependent upon government funds such as the Challenge Fund to maintain these important elements of the network.

Where Highways England works with the Department for Transport and others to improve the information disseminated to travellers and partner apps and services, LHAs should be kept informed and involved where possible. For example, journey time information on the SRN displayed on LHA-operated signs is likely to bring benefits to both the SRN and Local Road Network by informing people in good time before they are committed to using the SRN.

The proposals to improve the public perception of roadworks as well as those to investigate smarter working to minimise disruption are welcome. However, where roadworks or road closures are unavoidable, Highways England needs to prioritise high quality diversion routes. In many instances these are currently poorly signed and managed, resulting in not only frustration but also potential safety issues where drivers are forced to change lanes at motorway off-slips or junction gyratories where the diversionary signs are inadequate. Working with LHAs is vital to achieving this better signage, especially in the case of planned works. The *Initial Report* does mention this issue but it should be given high priority, as well as being a key focus for exploring where technology can assist drivers in-vehicle.

Future Studies

In section 5.3.11, the report outlines that future studies could be undertaken in a number of areas including: "*Free flow junctions – a strategic network assessment of the need for and potential to create free-flow connections at key SRN to SRN junctions, where lacking*". With this in mind, it is essential that Highways England reconsider its preferred option for the M2 Junction 5 improvements scheme to provide a free-flow, grade separated junction to allow for free-flow

movements on the A249 north and south through the junction (A249 north of the M2 is SRN). Highways England's current proposals for this junction are not aligned with the *Initial Report's* proposal to assess the potential for free-flow connections at key SRN to SRN connections and therefore must be re-designed to meet this emerging objective. Similarly, the knock-on effects from making improvements must be considered simultaneously. For this reason, M20 Junction 7 needs to be improved at the same time as M2 Junction 5 otherwise queues will just be moved along the A249.

Furthermore, the principle of making investment decisions based on lowering lifecycle costs should apply to all asset groups, as this would potentially free up maintenance resource elsewhere enabling a more resilient network during the assets' lifecycle.

Designated Funds and Local Priorities Fund

KCC welcomes roadside facilities being included in Section 5.4 'Designated Funds'. However, the roadside facilities fund must include provision for lorry parking. A lorry park fund is required to help local authorities (and the private sector) to build lorry parks that provide adequate facilities for drivers. . KCC has undertaken parking surveys in Kent which have found over 900 Heavy Goods Vehicles (HGVs) parked on both the SRN and the Local Road Network (LRN) each night. Due to this parking, residents are subjected to:

- Noise from parked HGV refrigeration units,
- Anti-social behaviour of some drivers depositing litter and using the surrounding areas as toilets,
- Road safety issues as HGVs are often parked in dangerous locations and cause obstructions.
- Damage to verges and kerbs by the weight of parked HGVs that is both unsightly and hazardous.

Additional lorry parking capacity is desperately needed in certain areas of the UK (especially in Kent) and is not currently being delivered to the required level by the private sector. The main obstacles to private sector delivery of lorry parks are the availability of funding or finance for the capital investment, and the planning process. Costs are often substantial and require a longer-term view of investment than a typical five to ten year return that private investors would require. Funding for lorry parks through the proposed roadside facilities fund could help to remove this barrier to the delivery of much needed provision KCC is currently developing business cases for potential sites in the county and a designated fund could help to finance these proposals. Given that the capital investment is a prohibitive factor, KCC would expect the fund to provide a capital contribution as well as facilitate involvement from Highways England in their access arrangements and signing from the SRN.

KCC welcomes the proposals for a new fund to be developed with the DfT and administered at a regional level to address safety, capacity and journey time priorities. There is currently a gap in transport scheme funding between those valued at around £5m (for which the National Productivity Investment Fund is a fund that could be bid for) and £70m+ (for which the Large Major Schemes Fund or the Housing Infrastructure Fund are applicable). Where there are housing growth opportunities with marginal viability, local schemes in-between these funding thresholds (above £5m but below £70m, which currently have no mechanism for funding) can often be constraints that inhibit housing delivery.

Further, KCC would like to see schemes for this fund developed by, or in conjunction with LHAs so that it truly reflects local priorities through the democratic process rather than being a fund internal to Highways England. For this reason, KCC believes that all designated funds should operate in the same way as the Growth and Housing Fund, for which Local Authorities can submit bids. Currently, for the other designated funds, the timescales during which they are open and the ability for outside bodies to submit bids is unclear.

Performance Measures and Targets

The '*Strategic Road Network Initial Report*' lacks information on methods of funding available to unlock housing growth or facilitate development. KCC is hopeful that the Growth and Housing Fund (or similar) is extended and funding made available to deliver schemes that remove constraints on the SRN that inhibit Local Authority housing targets being met. In fact, KCC recommends that enabling and accelerating housing growth should be included in Highways England's Key Performance Indicators to ensure that growth is delivered.

11. Are there any other proposals that you do not agree with? *

Yes

✓ No

Disagreed proposals

12. State the proposals you disagree with and what could be done differently?

KCC does not disagree with any of the other proposals in the *Initial Report*, although there are other factors that should be considered – see the response to Q19.

Future needs

13. Do you agree with Highways England's assessment of the future needs of the strategic road network? (See Initial Report section 4.4.) *

Yes

✓ No

Don't know

Future needs alteration

14. If you answered no, how would you change the assessment?

The future needs assessment of the SRN does not go into sufficient detail on how Highways England will continue to facilitate and accelerate housing growth across the country. KCC and Medway's Growth and Infrastructure Framework (GIF) 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 (www.kent.gov.uk/gif), however the refreshed GIF, due to be published this year, indicates accelerated growth with an emerging figure of 178,600 new homes by 2031. The GIF goes into detail on the transport infrastructure required to meet this level of housing growth. Highways England need to consider local authority housing targets and how it helps to unlock and accelerate housing growth in areas close to the SRN. KCC is continuing to update the GIF and would welcome collaboration with Highways England in some of the issues it addresses, specifically the SRN capacity and its impact on accommodating growth in Kent and Medway.

	1 - doesn't meet aim at all	2	3	4	5	6	7 - completely meets aim
integration?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>

Which aims could Highways England do more to meet and how?

Whilst the Economy section does include the need to meet national housing targets, KCC does not feel that the overall *Initial Report* goes far enough in this regard to meet the aims for *Economy* and *Network Capability* in providing a network that can meet future demands and support growth in the long term. The recent inclusion of 'housing' in the portfolio of the Secretary of State for Housing, Communities and Local Government emphasises the importance of housing delivery for the Government.

Also in regards to *Network Capability* the Government aims to deliver high quality communications networks for connected and autonomous vehicles (CAVs) and to support trials of CAVs. KCC would welcome the opportunity for a pilot of connected and autonomous freight vehicles along the M20 to the M25 along lane 1 only, specifically to assess how platooning of such vehicles could maintain fluidity of traffic at the port. This would complement the A2/M2 connected corridor trial in Kent looking at in-vehicle messaging.

More could also be done to achieve the aim of *Integration* as most journeys start and end on the Local Road Network, therefore schemes that improve connectivity between the Local Road Network and the SRN through increasing capacity at motorway junctions, and the provision of new junctions, would help to meet this aim.

More needs to be done to improve air quality with the *Environment* aim as many Air Quality Management Areas (AQMA) fall below legal limits as a result of the SRN, for example the Dartford Crossing.

Other questions

16. Do you think there should be any change in the roads included in the SRN? (See consultation document, section 1.3) *

Yes

No

Don't know

Roads

17. Which roads would you propose are added to or removed from the SRN, and why?

KCC would like the Department for Transport (DfT) to consider the following roads to be transferred to Highways England as part of the SRN as they are key strategic links between the M2 and M20. With KCC's strategic priority of bifurcation (splitting) of port bound traffic, coupled with planned port expansion at Dover and the 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 Junction 3 to M20 Junction 6)
- A249 Detling Hill (M2 Junction 5 to M20 Junction 7) (A249 from M2 Junction 5 to the Port of Sheerness is already SRN)

In addition to these roads providing links between Kent's two strategic motorway corridors, they also link main centres of population: the A229 links Maidstone (population of around 125,000) to the Medway conurbation (population of approximately 280,000) and to the M2 and M20 respectively; further, the A249 links Maidstone to Sittingbourne (population of 46,000) and to the M2 and M20 respectively. Therefore, they both satisfy one of the four point definitions of the SRN (linking the main centres of population) and should be added to the SRN.

Similarly, KCC recommends that the A299 Thanet Way from M2 Junction 7 (Brenley Corner) to the Port of Ramsgate should also become part of the SRN. The A299 Thanet Way is a major strategic road that carries large volumes of traffic (around 40,000 per day) and is vital to the economies of the Canterbury and Thanet districts within the Thames Estuary Commission Area which includes the northern coastal towns of Kent. The combined population of these urban areas is around 140,000, and this road links these main centres of population to the rest of the country. It also facilitates access to the Port of Ramsgate. It would therefore be logical to include it as part of the SRN, in a similar way that the A249 from the M2 (Junction 5) to the Port of Sheerness is part of the SRN as it connects a major port. Linking the main centres of population and facilitating access to major ports are two of the four-point definitions of the SRN; therefore the A299 should be added to the SRN.

Other questions

18. Is there anything else we need to consider when making decisions about investment in the network? *

Yes

No

Don't know

Other factors

19. What other factors do you want considered?

Implications of freight traffic and Brexit

Kent, as the international gateway from the UK to mainland Europe hosting the Port of Dover and the Channel Tunnel, must have adequate infrastructure to accommodate the number of freight vehicles that pass through the county on a daily basis so that the country's economy can continue to function effectively. This is vital even with the UK's exit from the European Union, especially given that the UK's plans for the future of the Customs Union are still unpublished.

The road freight industry is worth £74bn to the UK economy per annum and the Channel Ports play a vital role in this prosperity. In 2016 over 4.2 million HGVs passed through the Channel Ports – 2.6 million through the Port of Dover and 1.6 million through the Channel Tunnel, which together equates to on average 11,500 HGVs crossing the Strait of Dover each day (5,750 in

each direction). 70% of this HGV traffic from the Channel Ports uses the Dartford Crossing to travel to the Midlands and the north. The Channel Ports also handle 23 million passengers per year, which puts them on a comparable basis with London Stansted Airport (24 million passengers in 2016). Improvements are desperately needed to accommodate the DfT's growth estimates of 22% in freight volumes between 2010 and 2040 across the UK road network (DfT Road Traffic Forecasts, 2015).

In addition, an alternative solution to Operation Stack is desperately needed as the M20 must remain open to local residents and businesses at all times and Kent's local road network must not take the burden of delays in cross-Channel freight traffic. It is for this reason that KCC is very disappointed that the Government is no longer constructing a permanent lorry holding area at Stanford West. Whilst it is appreciated that work will continue on new proposals for accommodating freight in the event of cross-Channel delays, a planning application will not be considered until 2019. Whilst this would be of serious concern in its own right, the timing of this process as it is so close to Brexit makes the delays in identifying a solution all the more alarming. With rising concerns about the likelihood of more and more frequent delays in cross-Channel traffic and freight movements post-Brexit, there is an urgent need for the Government to move forward with an alternative to Operation Stack.

As such, the uncertainty over Brexit and its effect on the Ports, KCC urges that something needs to be done sooner to ensure that a solution is in place before the UK leaves the EU on 29 March 2019. For years KCC has argued that an alternative solution to Operation Stack, which blights not only Kent's residents and businesses but much of the UK, is needed. Operation Stack has an estimated cost to the Kent and Medway economy of around £1.45 million a day and across the country it was estimated to be about £250 million a day. There cannot be a repeat of the disruption experienced in the summer of 2015 when Operation Stack was in place for 32 days and caused travel chaos that negatively affected businesses across the whole of the UK. A solution to this problem should be an urgent priority of Government.

A further impact of the high freight traffic volumes travelling through Kent is the provision for overnight lorry parking. As a result of EU driver's hours regulation, HGV drivers 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 (including human waste), litter and noise disturbances, especially when close to residential areas. KCC has conducted a number of surveys into the volumes of inappropriately parked HGVs in the county and found that on average there were over 900 vehicles parked inappropriately per night. KCC therefore wants to work with Highways England, DfT and other relevant stakeholders to look into the potential of constructing a network of lorry parks across Kent to alleviate this problem and additional lorry parking should be added to motorway service areas, especially with Highways England's objective to improve roadside facilities.

To this end, KCC would also like to emphasise the importance of incorporating overnight parking into the new plans for an Operation Stack lorry area to provide much needed lorry parking capacity in Kent.

Connectivity to ports

It is clear that where the road network inhibits the ability of business to import and export, the UK's competitiveness is also inhibited. The Port of Dover has annual forecasts of growth of between 2% and 4%, and the Channel Tunnel up to 30% over the next five years. Delays and a lack of infrastructure capacity not only impact on the efficiency of the Channel Ports but also the economy in the Midlands and North which are dependent on imports and exports to and from mainland Europe through the Strait of Dover.

Major infrastructure enhancements are needed to facilitate growth at the Channel Ports with a

new strategic route to the Midlands and the North that will be enabled by the new Lower Thames Crossing. To ensure that the M2/A2 is a robust and resilient strategic link capable of handling the increased traffic as a result of the new Crossing, upgrades are needed. This includes the completion of the dualling of the A2 around Lydden on its final approach to the Port of Dover, free flow movement between the M2 and A2 at Junction 7 (Brenley Corner) and widening/all lane running along the M2 between junctions 4 and 7. There also needs to be consideration of a lorry area on the A2 to complement the lorry holding facilities being planned on the M20, including the application the principles of the existing A20 Dover Traffic Assessment Project (Dover TAP) to also queue freight traffic approaching the Port on the A2.

Analysis balance

20. Does the analytical approach taken have the right balance between ambition, robustness, and proportionality? (See chapter 6 of consultation document) *

Yes

No

Don't know

Different balance

21. What do you suggest we do differently?

The analytical approach takes the right balance between ambition, robustness and proportionality. However, the approach must ensure that it takes into account future housing growth and traffic demand, and that modelling takes into account additional traffic flow from other SRN schemes, for example, the traffic impacts of the new Lower Thames Crossing need to be taken into account in the and A2 Bean and Ebbsfleet junction improvements.

Final comments

22. Any other comments?