

Written evidence submitted by Kent County Council (FAB0018)

1 Summary

- 1.1 Kent County Council (KCC) is the Local Transport Authority for Kent responsible for 5,400 miles of roads. It has 81 elected Members representing approximately 1.5 million residents.
- 1.2 We welcome the opportunity to submit written evidence to this inquiry into Freight and Brexit. We would be very happy to expand on any aspect either in writing or as oral evidence.
- 1.3 Kent has a disproportionately high number of Heavy Goods Vehicles (HGVs) using its roads. This can lead to issues such as Operation Stack and inappropriate lorry parking which negatively affect our communities and the economy of the UK due to Kent's position as a strategic international gateway through the Channel ports.
- 1.4 KCC's response to this call for evidence highlights:
 - The infrastructure improvements required to support freight access to the Channel ports
 - The provision of overnight lorry parking facilities
 - Operation Stack
 - Customs clearance post-Brexit
- 1.5 **Infrastructure improvements:** The wider UK economy is dependent on freight fluidity through the Channel ports, and when the road network inhibits the ability of business to import and export, then the UK's competitiveness is also inhibited. Delays due to a lack of infrastructure resilience in Kent to feed the Channel ports affects growth across the UK, specifically the areas covered by the 'Midlands Engine' and 'Northern Powerhouse'.
- 1.6 To facilitate the effective movement of freight to the Channel ports, infrastructure enhancements are needed to provide a resilient network. These include enhancements to the M2/A2 corridor in combination with the new Lower Thames Crossing to provide a new strategic route from the Port of Dover to the Midlands and the North. Improvements also need to include the connections between the two strategic corridors of the M2/A2 and the M20/A20 to enable the bifurcation (splitting) of port-bound traffic, namely improvements to the A249 and A229.
- 1.7 KCC has for some time made the case for a fair proportion of the income from the HGV Road User Levy to be ringfenced to mitigate the burden of international traffic on local communities and to reinvest in the UK road network. Increased maintenance budgets should be made available for roads with significant HGV volumes.
- 1.8 **Lorry parking facilities:** Freight plays a major role in the Kent economy, with the county accommodating high volumes of freight vehicles. On average 11,500 HGVs cross the Strait of Dover each day and almost 1,000 lorries a night park in lay-bys, on verges and in other inappropriate locations across the county. Purpose built lorry

parking facilities are required to accommodate the needs of the freight industry - these are currently lacking in Kent where there is high demand due to its position as a strategic international gateway.

- 1.9 **Operation Stack:** Freight issues in Kent are of both local and national importance. Previous incidents of disruption and delay at the Channel ports have resulted in the use of Operation Stack to queue lorries on the M20 motorway and this causes a significant detrimental effect to both the local and national economy. For example, Operation Stack was in use for 32 days in the summer of 2015. This resulted in unprecedented disruption, which was estimated to cost the Kent economy around £1.45 million per day and the wider UK economy £250 million per day in 2015.
- 1.10 Currently Operation Stack works in three stages:
- Stage 1 – M20 Junctions 8-9 coast-bound is used to queue lorries and has capacity to hold 2,100 HGVs.
 - Stage 2 – M20 Junctions 8-11 coastbound is then used which has a further capacity to hold 1,500 HGVs (3,600 in total with stages 1 and 2).
 - Stage 3 – once stages 1 and 2 become full, Port of Dover bound HGVs are directed to Manston Airport which has a further capacity to hold 4,000 HGVs (7,600 in total). This should prevent the need to use the London-bound carriageway to queue HGVs as was the case in summer 2015.
- 1.11 KCC supports the use of Manston Airport as an Operation Stack contingency to prevent the London-bound carriageway having to be closed. However, a fully worked up solution is required that could be rapidly deployed and prevent the need to use any part of the motorway to queue HGVs. This will require additional resource, both in terms of revenue for operational staffing requirements and capital for appropriate infrastructure to support the solution. This is clearly a national issue; therefore, funding should be made available from Government. It is essential that the motorway is kept open for two-way traffic flow at all times and is never closed for the queuing of freight vehicles.
- 1.12 KCC also has concerns that Highways England's plans for both an interim and permanent solution to Operation Stack do not appear to be far enough advanced to be ready in time for the UK's exit from the EU. It is essential that a solution is in place that enables the M20 motorway to remain open in both directions with sufficient capacity to allow effective flow on the Strategic Road Network and maintain freight fluidity through the Channel ports.
- 1.13 **Customs clearance post-Brexit:** Kent as a strategic international gateway will be at the forefront of any changes to the customs arrangements. KCC asks that Government seeks to work with partners in understanding the full implications for freight traffic movements from a future customs arrangement.

2 Introduction

- 2.1 Freight plays a major role in the Kent economy and therefore KCC would like to share its experience and knowledge from a county which accommodates high volumes of freight vehicles. On average 11,500 HGVs cross the Strait of Dover each

day and almost 1,000 lorries a night park in lay-bys, on verges and in other inappropriate locations across the county.

- 2.2 Freight issues in Kent are of both local and national importance. For example, Operation Stack, which caused unprecedented disruption in the summer of 2015 when it was in use for 32 days, was estimated to cost the Kent economy around £1.45 million per day as it impacted residents and businesses. Its effects were much wider though, as the UK economy is dependent on freight fluidity through the Channel ports, and the wider impact was estimated at £250 million per day.
- 2.3 It is therefore clear that where the road network inhibits the ability of business to import and export then the UK's competitiveness is also inhibited. Delays due to a lack of infrastructure resilience in Kent to feed to Channel ports affect growth in the 'Midlands Engine' and the 'Northern Powerhouse'.
- 2.4 KCC's response below to this call for evidence highlights the infrastructure needs of the County relating to freight as well as our concerns relating to Brexit, Operation Stack and the customs clearance implications on freight fluidity.

3 Infrastructure improvements required to support freight access to the Channel ports

- 3.1 Freight transport volumes through Kent are disproportionately higher than on other parts of the Strategic Road Network (SRN) due to Kent's location as an international gateway. Highways England's Roads to Growth paper (2017) outlined the cost of congestion to the freight industry to be £14 billion in 2040 from a sector that provides 9% GDP. As well as this "24% of businesses cited the quality of connections to international gateways as a barrier to exporting." These statistics therefore heighten the need for improvements to the corridors serving the major ports within Kent.
- 3.2 In Kent there are several bottlenecks on both the SRN and local road network that inhibit growth in the road freight industry. The following schemes are needed to ease congestion and improve the road network for access to the ports at Dover, Eurotunnel and the Port of Sheerness. 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 motorway corridors (M20/A20 and M2/A2). Improvements required include:
 - New Lower Thames Crossing to create a new strategic corridor from the Midlands and the North to the Port of Dover, bringing resilience to the A282 Dartford Crossing.
 - Improved connections between the M2/A2 and the M20/A20, including an upgrade of the A229 Bluebell Hill and its junctions with the M2 (Junction 3) and the M20 (Junction 6) – the initially proposed new Lower Thames Crossing Option C 'variant'; and the A249 and its junctions with the M2 (Junction 5) and the M20 (Junction 7).
- 3.3 Improvements are needed on the approach to the Port of Dover via the M2/A2 to relieve congestion and provide increased resilience and capacity; and are essential

when the new Lower Thames Crossing is open in 2027 to complete the new strategic route to the Port of Dover. These include:

- A2 Lydden to Dover – completion of the 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;
- Widening/all lane running along the M2 between junctions 4 and 7 to increase capacity of this two-lane motorway.
- A2 Dover Traffic Assessment Project (TAP) to complement the existing Dover TAP on the A20 to reduce congestion through Dover town and provide additional HGV holding capacity when there are delays at the port.

3.4 Undoubtedly, where the road network inhibits the ability of businesses 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 ('Midlands Engine') and the North ('Northern Powerhouse') which are dependent on imports and exports to and from mainland Europe through the Strait of Dover. Recently, the Mayor of the West Midlands Combined Authority – Andy Street, emphasised in an article for The Times that Dover Port is critical to car manufacturing in the West Midlands.

HGV Road User Levy Revenue:

3.5 KCC welcomed the introduction of the HGV Road User Levy in 2014 having long made the case such a scheme to charge foreign registered HGVs to use the UK's road network to level the playing field for UK hauliers. KCC believe that the net revenue from the levy should be spent on mitigating the adverse impact of HGVs on UK roads and local communities. A fair portion of the net revenue from the levy should be spent on building greater resilience into the UK's road network and safeguard good access to the UK's ports. Increased budgets must also be made available for road maintenance for both the strategic and local road networks where there are high freight volumes such as in Kent.

Rail Freight Improvements:

3.6 Rail freight is more environmentally friendly than road freight using 76% less carbon dioxide than the equivalent road freight movements. A major limitation of rail freight in Kent is capacity on existing lines, especially for rail freight operators to obtain train paths through London. KCC fully supports modal shift from road to rail freight to reduce HGV movements in the county, so long as it does not adversely affect peak rail passenger services.

3.7 The annual volume of rail freight through Kent is around one million tonnes; however, there is spare capacity on the three Mainline rail routes through Kent (one via Maidstone, one via Tonbridge and Redhill, and one via Tonbridge and Sevenoaks). While there are gauge constraints on these routes, there are paths on each that were

guaranteed for freight as part of the initial agreement for the construction of the Channel Tunnel. High Speed 1 (HS1) has European gauge standards and, while capacity for slow-moving freight trains on that line is limited to the night hours, with careful planning and accurate timekeeping a small amount of traffic could use this route. One problem is that terminal capacity at Dagenham, where freight trains leave HS1, is limited, which is a key constraining factor.

4 Overnight Lorry Parking

- 4.1 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 repeat surveys into the volumes of inappropriately parked HGVs in the county and found that on average there were nearly 1,000 vehicles parked inappropriately per night.
- 4.2 KCC is working with Highways England, the Department for Transport (DfT) and other relevant stakeholders to investigate the potential for constructing a network of lorry parks across Kent to alleviate this problem and provide safe and secure facilities for drivers. Additional lorry parking should also be added to motorway service areas, especially considering Highways England's objective to improve roadside facilities as proposed in its recent Initial Report on the SRN. The better utilisation of motorway service areas is a clear opportunity to quickly provide some relief to the problem of overnight lorry parking until additional dedicated facilities can be provided.
- 4.3 KCC makes the case for a lorry park fund to help local authorities (and the private sector) to build lorry parks that provide adequate facilities for drivers. 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 Highways England's proposed roadside facilities fund (as set out in its Initial Report) could help to remove this barrier to the delivery of much needed provision.
- 4.4 KCC is currently developing business cases for potential lorry park 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 to agree access arrangements and signing from the SRN.

5 Operation Stack - background

- 5.1 Operation Stack is a tactical response to queue freight vehicles along the M20 when cross Channel services at Eurotunnel and the Port of Dover become disrupted for a prolonged period of time. The current arrangement is for the coastbound carriageway

of the M20 to used to queue freight vehicles between Junctions 8 and 11, after which lorries destined for the Port of Dover will be routed via the A249 from M20 Junction 7 to the M2 and A299 to be held at the former Manston airport until release along the A256 to Dover. This should prevent the use of the London-bound carriageway of the M20 to queue cross Channel freight traffic.

- 5.2 KCC welcomes the continued reservation of the former Manston Airport runway for Operation Stack as a contingency to prevent the London-bound carriageway of the M20 being closed. However, a fully worked up solution is required that could be rapidly deployed and prevent the need to use any part of the motorway to queue HGVs. This will require additional resource, both in terms of revenue for operational staffing requirements and capital for appropriate infrastructure to support the solution. This is clearly a national issue; therefore, funding should be made available from Government. It is essential that the motorway is kept open for two-way traffic flow at all times and is never closed for the queuing of freight vehicles.
- 5.3 Operation Stack has been implemented 48 times between 1997 and January 2015 with an average duration of 5-6 days a year. However, in first 7 months of 2015, Operation Stack was implemented for 32 days, 5 days in January and then almost continuously in late June and throughout July. During this period there were several occasions when both the coast-bound and London-bound carriageways of the M20 between Junctions 8 and 11 were used to queue cross Channel freight.
- 5.4 Operation stack is a national issue. The economic impacts of Operation Stack are significant both locally and nationally. The events of June and July 2015 clearly demonstrated that when there is disruption at the Channel ports (Eurotunnel and Port of Dover), the current use of Operation Stack with complete closure of the M20 motorway between junctions 8 and 11, is unacceptable. The economic impacts are felt nationally, especially by businesses reliant on 'just in time' deliveries.
- 5.5 Kent has strong transport and logistics and tourism sectors and both reported real losses as a direct result of Operation Stack. Kent businesses have been negatively impacted with 45% of tourism businesses reported cancellations and 59% considered that they had lost up to 20% of business. The widespread traffic disruption due to Operation Stack not only prevents international freight fluidity with direct costs to business and national economies, but also affects local accessibility and business productivity; and undermines the perception of Kent as a place to do business and to visit.
- 5.6 Traffic disruption causes the loss of employee hours, delays to business deliveries and local service provider cancellations. It causes considerable journey time delays and journey time unreliability. There is a significant human cost of the effect of the congestion in the county caused by Operation Stack. This includes care workers not being able to get to those they look after, patients not being able to get to doctor's surgeries or hospital, appointments being missed, people not being able to get school or work and not being able to access the most basic services, e.g. not being able to get to shops for food etc.

- 5.7 Finding an alternative solution to Operation Stack is a key strategic priority for KCC as set out in *Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031)* and the *Freight Action Plan for Kent* policy documents. It is essential that the alternative solution keeps the motorway open for two-way traffic flow at all times and is never closed for the queuing of freight vehicles.

6 Operation Stack current proposals

- 6.1 In November 2017 the Government withdrew its decision to proceed with the Stanford West lorry area, however, it is still fully committed to finding a solution to the problem. Highways England is developing new plans for both an interim on-highway solution as well as a permanent solution, potentially including a lorry park or parks, to cope with disruption on Kent roads caused by cross-Channel disruption as well as providing daily parking for lorries. A consultation on these plans is expected between June and July 2018.
- 6.2 KCC has several concerns about Highways England's current proposed options for the interim solution. Any plan to hold HGVs on the M20 while also allowing non-port traffic to continue to travel in both directions will significantly reduce capacity on the M20 with a contraflow on the London-bound carriageway for non-port traffic between junctions 8 and 9, and the likelihood of a 50 mph speed restrictions. This may result in the kind of massive disruption to both strategic and local traffic that is suffered with the existing arrangements for Operation Stack. KCC insists that the M20 remains fully open for two-way traffic at all times with sufficient capacity to allow efficient flow on the strategic road network and no leakage of traffic onto an already stressed local road network.
- 6.3 As well as the interim solution to Operation Stack, Highways England is also working up plans for a permanent on-highway solution or one or more lorry parks across the county to deal with the stacking of lorries when an Operation Stack event is called. KCC is fully supportive of the concept of a permanent solution being brought forward, however, we are disappointed that the completion date of any such scheme, if it is taken through the Development Consent Order (DCO) process, is now likely to be 2023 at the earliest, 8 years after the Government's commitment in the Autumn Statement of 2015 to deliver a solution "at pace".

7 Customs Clearance

- 7.1 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 Eurotunnel which equates to on average 11,500 HGVs crossing the Strait of Dover each day (5,750 in each direction). At present only 3% of these volumes are non-EU registered and therefore require customs clearance.
- 7.2 We do not yet know what the customs arrangements will be after the UK leaves the European Union - in March 2019. However, KCC would like to stress the importance of maintaining traffic fluidity post-Brexit. This is of paramount importance to the ports, hauliers, the County of Kent, and the wider UK economy.

- 7.3 Leaving the EU means the reintroduction of a customs border between the UK and EU and could lead to a more onerous regime of checks for product safety and control of foodstuffs. The Port of Dover estimates that, if two minutes are added on average to the time it takes to process a truck, the volume of traffic the port handles means the port would face 17-mile tailbacks each day.
- 7.4 KCC would not welcome a repeat of the disruptions caused in 2015 when Operation Stack was in place for 32 days. As such it is imperative that whatever customs arrangements are decided upon for the UK, it is essential to engage with European partners to ensure European ports, such as Calais, are also ready. Contingency should also be considered for ferries to be diverted to other ports to maintain freight fluidity into and out of the UK.
- 7.5 There are currently two main points of entry into Kent - the Port of Dover and Eurotunnel. Import traffic through both totals about 2 million vehicles a year. However, as most of the goods are from the EU they are not subject to border controls as they are entitled to free movement. From an operational viewpoint - a move from the current 100,000 HGV Third Country movements, to an estimated 2 million a year, would require an increase in Customs checks, and conversely Kent County Council Trading Standards checks. Currently, this requires 1,910 hours port work a year. In future, this could require 6,810 hours per year for 2 million HGV Third Country movements. KCC are concerned about how these additional hours will be funded. Any additional customs checks would also necessitate a requirement for further lorry parks where these checks could be carried out.

8 Conclusion

- 8.1 Kent as a strategic international gateway will be at the forefront of any changes to the ease of freight movement between the UK and the EU post Brexit. Kent County Council is extremely concerned by the lack of clarity over future customs arrangements and the effect this could have on freight traffic movements through the county. Previous incidents of disruption and delay at the Channel ports have resulted in the use of Operation Stack to queue lorries on the M20 motorway and this causes a significant detrimental effect to both the local and national economy.
- 8.2 The current plans for both an interim and permanent solution to Operation Stack do not appear to be far enough advanced to be ready in time for the UK's exit from the EU. Kent County Council insists that a solution must be in place that allows the M20 motorway to remain open in both directions with sufficient capacity to allow effective flow on the Strategic Road Network and maintain freight fluidity through the Channel ports.
- 8.3 To facilitate the effective movement of freight to the Channel ports, infrastructure enhancements are needed to provide a resilient network. These include enhancements to the M2/A2 corridor in combination with the new Lower Thames Crossing to provide a new strategic route from the Port of Dover to the Midlands and the North. Improvements also need to include the connections between the two strategic corridors of the M2/A2 and the M20/A20 to enable the bifurcation (splitting) of port-bound traffic, namely improvements to the A249 and A229.

8.4 Infrastructure is also required to accommodate the needs of the freight industry with sufficient lorry parking facilities that are currently severely lacking in Kent where there is high demand due to its position as a strategic international gateway.

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