

## **Response to Highways England's Solutions to Operation Stack: Managing Freight Traffic in Kent**

Thank you for the opportunity to comment on the proposals contained in the current Public Information Exercise associated with the above.

Dover District Council (DDC), through a function of our geography and the nature of the operation at the Port of Dover, has lengthy experience of the impact of freight traffic through the East Kent area and Dover district in particular. In this respect, DDC welcomes the recognition that solutions to this matter must be found but is disappointed in the absence of specific proposals. The need for such solutions are imperative both in relation to the ongoing impact of freight traffic and the wider aims and ambitions for growth – a balanced delivery of housing and employment – across the East Kent area being brought forward through emerging Local Plans.

From DDC's perspective, the impact of freight traffic has resulted in two major issues over time; these being the impact of Operation Stack along with the habitual daily issues associated with overnight lorry parking where some 1000 lorries are being parked across the county on a nightly basis.

DDC is firmly of the view that the two strategic routes to and from the Port of Dover through Dover district, East Kent and the wider county, being the M20/A20 and M2/A2, need to be read as one. The effects and consequences of reductions in service on one of the routes greatly impacts on the operation and serviceability on the other route. To this end, joint solutions to Operation Stack and overnight parking (along with any day time needs) should be encouraged, without such solutions being confined to one single route. This should also be reflected in terms of externalities such as the delivery of the Lower Thames Crossing which will also impact on the current situation.

With regard to the existing position, DDC has welcomed the introduction of the Dover Traffic Access Protocol. This, along with improvements to capacity at the Port, has allowed traffic to flow freely on a short term basis, but places an ongoing reliance on the Port of Dover Police to operate the arrangement and has a finite capacity. It does not provide the long term fix in the event that Operation Stack is called into being.

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Along with TAP, DDC is currently engaging through the planning process with a number of enquiries for private sector led off road overnight lorry parking facilities and which is hoped will secure positive engagement from Highways England.

In the event that Operation Stack is called-up, DDC does not support the view that Manston Airport can provide an effective short-term solution. We are very aware of the challenges around separation of traffic flow for either Port of Dover or Eurotunnel bound traffic on the M20 along with the diversion to and practical operation of Manston. From witnessing a very limited trial which took place, it is evident that a parking facility at Manston is unlikely to be able to effectively serve the roll-on requirements at the Port of Dover without severe operational impacts in Thanet and Dover districts.

DDC welcomes the prospect of a permanent solution to Operation Stack and would request that this is capable of also serving the growing needs associated with overnight lorry parking. Assuming this can be achieved on the M20 route, any solutions should also be accompanied by proportionate off-road lorry parking solutions on the M2/A2 route. While suggestions have been made around the introduction of a complimentary TAP arrangement on the A2, this should only be considered on dual carriageway sections of the A2 subject to clarification of suitable policing arrangements being assured. On this point, DDC remains of the view that a joined-up approach to infrastructure in East Kent is long overdue and that the dualling of the A2 from Lydden to Dover should be afforded the highest priority. This would align with and support the Lower Thames Crossing, the strategic position of the Port of Dover and the wider housing/growth agenda in East Kent (as set-out in the attached Executive Summary of the East Kent Growth Framework).

As far as the prospect of temporary traffic management measures on the M20 are concerned, DDC has a number operational points which require clarification:

- How quickly will this facility be established? We understand that there are conflicting views over set-up times;
- Will the set-up time effectively lead to this temporary arrangement being in place permanently;
- What are the implications for speed control and safety controls around this;
- What welfare and support facilities will be put in place and how will these be maintained;
- How will the queuing arrangements operate for businesses located in East Kent/Dover district.

I hope the above comments are of use and would hope that we can have a more detailed discussion here in Dover when diary constraints permit.

Yours sincerely

**N J Collor**  
Cabinet Member for Access & Licensing