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8Div/BSP for Monserat Properties Limited (7647)

South East Plan Examination in Public

Written Statement

**(See also Transport Statement Submitted
on Behalf of Monserat Properties)**

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8Div - Implementation and Format

8Div.1 Have the water supply and waste water treatment, flood risk, and transport implications of the growth proposals been adequately considered?

Introduction

- 1 This transport statement has been prepared in support of a proposed new junction with Lorry Park and services, between the existing junctions 10 and 11 on the M20, near Ashford Kent, together with a link to the A2070 and proposed employment land.

- 2 The current proposals are shown on the scheme layout plan contained in the response by Monserat Properties dated 10th May 2006 to the 2005 GOSE report entitled 'Position Paper on Current Proposals for Mitigation Measures for Operation Stack'. The scheme includes a new Junction 10b east of Mersham, located between Evegate and Sellindge. The new junction would serve a new lorry park, a service station with overnight facilities (also as ancillary to the lorry park), a site for 5000 new jobs and a link road to the A2070. These proposals would effectively help to relieve some of the traffic flows from junction 10 (or Junction 10a), provide overnight lorry parking facilities and services and could also be used during operation Stack as an off-line storage area for lorries.

South East Plan - Relevant Strategies and Policies

- 3 The Core Document acknowledges under Section 2. Issues and Challenges, that with respect to the South East, "*parts of its road and rail systems are heavily congested.*"

- 4 Core Strategy CO1 is intended to provide for development to deliver the housing requirements of the plan and build on the sub-region's economic strengths particularly in education, science and technology in ways which will "*Ensure the provision of infrastructure which is essential to the proper functioning and future development of the area*". The importance of putting in place the required infrastructure is re-emphasised in policy CO7, which

- states that “*The planning authorities will ensure that infrastructure needed to support development in the sub-region is identified and delivered in time to meet the needs of the population they are serving*” and that “*future development will be contingent on this*”.
- 5 Cross-cutting policy CC5 states that “The scale and pace of development will be dependent on there being sufficient capacity in existing infrastructure to meet the area’s current needs and the provision of new infrastructure to meet the needs of new development.”
- 6 Communications and Transport Policy T1 (Manage and Invest) states that “*Investment in upgrading the transport system should be prioritised to support delivery of the spatial strategy by .. supporting the function of the region’s international gateways and inter-regional movement corridors..*” The M20 is confirmed as being an international and inter-regional corridor.
- 7 Under the East Kent and Ashford Sub-region, policy EKA10 confirms that “*The planning authorities will ensure that the infrastructure needed to support development in the sub-region is identified during the refinement of the strategy for the sub-region for inclusion in the Sub Regional Investment Framework*”

Transport Issues

The Importance of the M20

- 8 The position paper produced by GOSE on the Current Proposals for Mitigation Measures for Operation Stack stated that “*The M20 is a major national and trans-national route of importance to the national economy.*” The importance of the M20 as an international and national corridor is also set out in the SE Plan (see above), however, there are a number of issues which affect the operation of the M20 as discussed below.

Operation Stack

9 There are 3 phases of implementation as follows:

Phase 1: close M20 southbound between junctions 11 and 12 – this allows 1000 lorries to park on the motorway.

Phase 2: closure of M20 between junctions 8 and 9 southbound - this allows 2000 lorries to be stacked on the motorway

Phase 3: closure of M20 northbound between junctions 8 and 9. This phase has not been used in the recent past.

10 We understand that Operation Stack has been implemented the following numbers of times over recent years:

2004: Operation Stack implemented 9 times

2005: Operation Stack implemented 17 times

2006: Operation Stack implemented 6 times

11 The M20 and surrounding highway networks can be reduced to a standstill when Operation Stack is implemented. This not only impacts on the transport system in the area, but also has negative economic impacts on numerous businesses not only in the Ashford area, but also in Kent as a whole.

12 Local and regional distribution of goods and services delayed due to diversions and the social and economic wellbeing of residents within the local authorities of Dover, Shepway, Ashford and Maidstone remains difficult to quantify. The impact of heavy vehicles, buses and greater numbers of private cars on more environmentally and congestion sensitive roads is great and is also difficult to quantify as are the overall cost implications. This is particularly worrying if the Ashford growth area is to

- fulfil its aspirations to deliver 28,000 new jobs by 2031 alongside 31,000 new homes.
- 13 Locate in Kent, when marketing Kent, have often been told by potential new businesses that they see Kent as “closed” when Operation Stack is in operation and that the possibility of disruption to business is a strong reason for not locating in Kent.
- 14 On the 1st February 2007, Operation Stack was discussed in the House of Commons under an Adjournment Debate. The debate had been called by MP for Ashford Damian Green, to draw attention to the disruption caused in Kent by Operation Stack. Both Damian Green and the Transport minister Stephen Ladyman are determined to find a solution to Operation Stack, and it was confirmed that 4 possible lorry park sites are currently being considered. These sites were considered in the GOSE report entitled ‘Position Paper on the Current Proposals for Mitigation Measures for Operation Stack’ dated 2nd December 2005, and the Sellindge-Evegate proposal is included as one of the sites. The response to the GOSE report prepared by Monserat Properties and dated 10th May 2006, sets out the environmental benefits of the Sellindge-Evegate proposals, and confirms that the site lies outside the Kent Downs AONB.
- 15 Operation Stack not only has huge negative impacts on local, regional, national and international businesses, commuters and local residents, it also has a huge impact in terms of the carbon emissions which are generated every time Operation Stack is implemented.
- 16 It has been calculated that under a do nothing situation, around 200,000T of CO2 emissions will be produced during the life of the plan if Operation Stack continues as it does so at present. The Sellindge-Evegate proposal could produce CO2 savings in the order of 160,000T, as shown in the BSP

paper ‘Solving Operation Stack, Reducing Carbon Emissions’ dated February 2007. The average UK household emits just over 20T of greenhouse gas emissions (including CO2) per year.

Increased Freight at Eurotunnel and the Port of Dover

- 17 Kent is the first point of landing for a high percentage of freight from Europe. This freight is on the increase with up to 11,000 lorries on peak days passing through the Channel Tunnel and the Port of Dover each day
- 18 In 2005, over two million lorries passed through the Port of Dover in a single year for the first time. According to both Dover Harbour Board and Eurotunnel, the number of lorries passing through is set to rise from a combined total of 3.5m per year to just under 6m by 2031.
- 19 The majority of these lorries travel along the M20 past Ashford on their way to and from the Port, and the above numbers highlight the importance of the M20 as a strategic route of regional, national and trans-European importance. It is vital that this artery is kept open to traffic.

Junction 10, M20

- 20 The existing congestion at Junction 10 is not only a problem to local traffic, but also impacts on longer distance traffic and the strategic highway (M20) network. The HA identified this problem a number of years ago, which led to the work on various improvement measures considered for the inclusion in the Targeted Improvements Programme.
- 21 The preferred Junction 10a option has been designed for a design life of 15 years, and presumably takes into account all committed and previous Local Plan sites in the area. Traffic forecasting is inherently difficult to carry out over 15+ year time periods however, and it is possible that the

amounts of future traffic could be higher than those levels used in the traffic capacity work. Similarly, the increasing number of HGV's year on year, coupled with the increased expansion plans for Dover Port, will inevitably lead to further congestion in the future.

Ashford Growth Area

22 The Ashford Growth Area is planned to provide an increase of 31,000 additional houses and 28,000 new jobs by 2031.

23 The growth of Ashford will place significant demands on various parts of the existing highway infrastructure, including the M20 motorway and trunk roads, and the AHTS is intended to support the highway build programme through the statutory processes.

24 It is apparent that the already congested junction 10 of the M20 will not be able to accommodate such a large increase in jobs and housing. Plans to close the slip roads at junction 10 and construct a new junction 10a have been taken forward, however, this new infrastructure may fail to cope with the additional traffic demand and further measures may be required.

Ashford Lydd Airport

25 Ashford Lydd Airport is proposed in the plan to undergo managed growth, to allow it to develop as a regional gateway serving Kent and East Sussex with significant economic benefits for the sub-region.

26 Traffic travelling to and from the north would travel via the M20 at junction 10 (or the new junction 10a) and via the A2070 which provides a link between Ashford and Lydd Airport. Plans for growth at Ashford Lydd Airport will therefore inevitably increase the amount of traffic passing through Junction 10/10a of the M20.

Lorries

27 In addition to the above issues affecting the M20, there are also environmental issues regarding lorry parking on County Roads. Apart from the Ashford Truck-stop, there are no official lorry parks for overnight parking in Kent and most drivers lay-up in lay-bys, business parks/industrial areas, on street or some may use the Motorway service areas. However, most overnight stopping places do not cater for lorries' and so drivers clog up main arterial routes which are unsuitable are also utilised.. In ballpark terms therefore, there is a need to create a lorry park to accommodate around 1000 lorries for overnight parking in Kent

The Eddington Transport Study

28 The Eddington Transport Study has recently been published, which was commissioned by the Government to advise on the long-term links between transport and the UK's economic productivity, growth and stability, within the context of the Government's commitment to sustainable development.

29 The ETS states that “***There is clear evidence that a comprehensive and high-performing transport system is an important enabler of sustained economic prosperity: a 5 per cent reduction in travel time for all business and freight travel on roads could generate around £2.5 billion of cost savings – some 0.2 per cent of GDP.***”

30 The ETS also indicates that government will need to show considerable foresight to deliver a transport system capable of supporting the continued success of the UK economy in the global market place, whilst ensuring that transport plays its role in meeting environmental challenges. One of the key recommendations in the report is that “***Over the next 20 years,***

the three strategic economic priorities for transport policy should be: congested and growing city catchments; and the key inter-urban corridors and the key international gateways that are showing signs of increasing congestion and unreliability. These are the most heavily used and economically significant parts of the network”.

The Monserat Proposals

- 31 We believe that the Monserat proposal will help to address the congestion issues on the M20 (an international gateway) during Operation Stack in line with the recommendations in the ETS report, and will help to rationalise this gateway by providing overnight/stop-over facilities for lorry drivers.
- 32 There are a number of benefits which the Junction 10b, M20, Sellindge-Evegate proposal provides including the following:
- it would provide a solution to the operation stack issue; the proposed service area and overnight facilities would operate continuously throughout the year, however, they would also be ancillary services to the lorry park during day to day operation and also during times of Operation Stack. The lorry park would be able to accommodate up to 1000 lorries, and hence this would provide parking for the majority of HGV's which currently need to stack on the M20 and surrounding roads/areas.
 - It would create a link to A2070; this would help to reduce the levels of traffic which pass through junction 10, or the planned junction 10a, thereby freeing up some highway capacity and improving safety at this junction.
 - it would help free up capacity on the A2070 southern ring around Ashford; there would also be benefits to the whole of the South Ashford area, due

to this element of traffic being removed from the A2070. This would therefore help to mitigate against the additional traffic generated on the A2070 and beyond by the Cheeseman's Green proposals.

- there would be less environmental impact than that which would arise with the other potential lorry park at junction 11.
- there would be sustainable merits with the proposal in that employment development in the Monserat scheme and residential development (e.g. Cheeseman's Green) would be able to be developed in parallel, which would help facilitate sustainable modes of travel.
- it would create a positive economic impact on the area due to the additional employment land and associated work opportunities, and depending on the type of development, could provide a positive impact on regional and inter-European trade.
- the location for a lorry park facility with associated services between Evegate and Sellindge is ideal, as it is around 15 miles from Dover. This would enable drivers leaving the country to break their journey or wait for their crossing time at a conveniently close location. Similarly, drivers arriving from the continent would be able to use the facilities and prepare for their onward journey.

8Div.2 – No comment

8Div.3 – No comment