

Solutions to Operation Stack
Kent Public Consultation
Highways England

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19 July 2018

Dear Sir/Madam

**Solutions to Operation Stack: Managing freight traffic in Kent Public Consultation:
response from Transport Focus**

Transport Focus is the independent consumer watchdog representing the interests of all users of England's motorways and major 'A' roads, and we welcome the opportunity to respond to this consultation.

We had previously highlighted the adverse impacts of the activation of Operation Stack in Summer 2015, on both port-bound traffic and other road users, and so strongly support Highways England's aim to avoid a return to that in all but the most exceptional circumstances. We agree that a lorry holding area solution must be developed; this should be part of an overriding objective of keeping all traffic flowing as smoothly and safely as possible, to help deliver the best possible journey experience.

There is clearly a range of factors that need to be considered in determining whether the lorry holding area should be located close to the ports or elsewhere along the major approach routes, and whether it is better kept within the highway boundary or developed off-road. Transport Focus wishes to ensure that the impact on road user experience is prominent amongst those considerations. The soundings we took in 2015 and 2016 highlight the importance of minimising adverse impacts on non-port road users, and of providing much better welfare facilities for lorry drivers on a permanent basis, not just at times of cross-channel disruption. Our most substantive evidence from that time is the 2016 research report *A Safe Place to Park*, which involved over 200 interviews with lorry drivers using the Port of Dover and Eurotunnel, both British and foreign. In light of this, Transport Focus believes that an off-road location is much more likely to be able to meet the welfare and other needs of cross-Channel lorry drivers and minimise impacts on other road users in the area.

Relevant findings from that research are:

- Highways England should consider how the holding area can be made available for use as much of the time as possible, given that drivers say they would use it even when there is no cross-Channel disruption.
- the new lorry holding area, Highways England should ensure that the facilities offer showers as well as toilets and should provide a high degree of security for parked vehicles.

We stress the importance of clear information to all the different types of users who will be affected, through a "single source of truth". We currently see no evidence of substantive progress in this area since 2015.

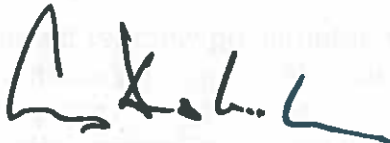
Transport Focus is keen to ensure what is provided meets the needs of lorry drivers and the freight industry, both major users of Highways England's Roads.

In parallel with this Public Information Exercise we are pleased to have been invited by Highways England to help them better understand the user perspective in relation to the planned **Operation Brock** temporary measures, to be installed on M20 J8-9 by March 2019.

We are pressing for maximum clarity about what will be happening and how different types of journeys will be affected including:

- extra journey time
- minimise impact during construction
- high quality communications during construction including what is going on and why and seeking effective use of the wider road network in East Kent, including the M2 and parallel A20.

Yours faithfully



Guy Dangerfield
Head of Strategy