

28 October 2016

Transport Strategy Team, Planning and Environment Division
Kent County Council
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Submitted electronically to:
LTPConsultation@kent.gov.uk

Dear Sir/Madam

ICE's Response to the Local Transport Plan 4: Delivering Growth without Gridlock 2016 - 2031

Introduction

The Institution of Civil Engineers (ICE) is an international membership organisation that promotes and advances civil engineering around the world. ICE is a qualifying body, a centre for the exchange of specialist knowledge, and a provider of resources to encourage innovation and excellence in the profession worldwide.

ICE South East England welcome the opportunity to respond to the Consultation. We look forward to working with the Kent County Council to develop an efficient and effective transport system for the region.

Our Response

Q1. Are you completing this questionnaire on behalf of:

Please select the option from the list below that most closely represents how you will be responding to this consultation.

<input type="checkbox"/>	Yourself as an individual	
<input type="checkbox"/>	Yourself as a member of KCC Staff	
<input type="checkbox"/>	A District/Town/Parish Council	
<input type="checkbox"/>	A Charity, Voluntary or Community Sector Organisation (VCS)	
<input type="checkbox"/>	A Business	
<input checked="" type="checkbox"/>	Other, please specify: <table border="1" data-bbox="564 1760 1375 1863"><tr><td>A membership association representing 11,000 civil engineers in the South East of England</td></tr></table>	A membership association representing 11,000 civil engineers in the South East of England
A membership association representing 11,000 civil engineers in the South East of England		

Q1a. If you are responding on behalf of a Council/Business/VCS

Organisation, please tell us the name of the organisation:

Institution of Civil Engineers South East England

Q2. Please tell us your postcode: _____ SW1P 3AA _____

We use this to help us to analyse our data. It will not be used to identify who you are.

The draft Local Transport Plan sets out the following Ambition for Kent:

To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported.

Q3. To what extent do you agree or disagree with the overall Ambition set for the Local Transport Plan?

*Please select **one** box.*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q3a. Please add any comments on the overall Ambition set for the Local Transport Plan below:

ICE South East England supports Kent County Council's (KCC) vision for the transport network, but encourages KCC to take a more future-focused approach.

The Local Transport Plan highlights a number of long term trends, primarily population growth, but as a strategy that is looking up to 2031, a number of the solutions proposed are already being progressed, such as the Lower Thames Crossing. KCC could provide further leadership by exploring more long term solutions to 2031, considering possible decisions that will need to be made in the 2030s.

The Ambition mentions an 'environment that is enhanced', but does not make reference to climate change. Climate change will mean transport infrastructure will need to be more resilient to extreme weather events and KCC should embedded adaptation and mitigation measures into the overall Ambition as well as the Local Transport Plan more generally.

The Plan also refers to the Thames Estuary 2050 Growth Commission which is assessing opportunities for development in East London, North Kent and South Essex. It is the ICE South East England's understanding that the Commission will examine where clusters of productivity can be formed and what infrastructure is required to support these clusters. ICE South East England therefore believe that KCC should take this approach to its Local

Transport Plan, by highlighting a number of key clusters for transport improvements. By developing these clusters and improving connectivity of the region to them, KCC could boost economic growth more effectively. ICE South East England also understand that the Commission will be responding to the Call for Ideas shortly by presenting its vision for the region and therefore calls on KCC to ensure all transport plans consider and comply with this vision.¹

Q4. This Ambition will be realised through five overarching Outcomes and Supporting Policies. To what extent do you agree or disagree with each of the Outcomes and Policies? Please select *one* box per outcome.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
Outcome 1. Economic growth and minimised congestion. Policy: Deliver resilient transport infrastructure and schemes to reduce congestion and improve journey time reliability, to enable economic growth and appropriate development.	X					
Outcome 2. Affordable and accessible door to door journeys. Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.	X					
Outcome 3. Safer travel. Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.	X					
Outcome 4. Enhanced environment. Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.		X				
Outcome 5. Better health and wellbeing. Policy: Promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.		X				

¹ [ICE South East England Response to the Thames Estuary 2050 Growth Commission's Call for Ideas, September 2016](#)

Q4a. Please add any comments on the five overarching Outcomes and Supporting Policies below:

ICE South East England agree with the Outcomes of the Local Transport Plan.

As mentioned previously, Outcome 4 should be amended to have a greater emphasis on climate change.

Outcome 5 is also supported, however there seems to be little strategic focus on active travel within the Plan. KCC should look to examine if there are more ways to encourage walking and cycling across the county.

Q5. To what extent do you agree or disagree with the Strategic Priorities for the Local Transport Plan? (Pages 11 to 21 in the LTP)

Please select **one** box.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q5a. Please add any comments on the Strategic Priorities for the Local Transport Plan below:

Please indicate which **Strategic Priorities** you are commenting on.

Enabling Growth in the Thames Gateway

ICE South East England support the development of Ebbsfleet Garden City and is pleased to see the transport improvements that will help boost capacity on the congested road network surrounding the site. As mentioned previously, KCC should look to form clusters of productivity in the region and should therefore consider the role that Ebbsfleet and Ashford play. The proximity of Ebbsfleet to London means that Ashford may be a more beneficial cluster for the County and that upgrades to Ashford station and the line should be prioritised. Improvements to the line between Ashford and Gatwick should also be prioritised.

New Lower Thames Crossing

ICE South East England support KCC's call for a new Lower Thames Crossing and have also backed the C Variant as the option which provides the most benefit to the transport network. In our response to the consultation, ICE South East England called for the Crossing to also have a light rail link, connecting the Tilbury loop line and the North Kent Railway to ensure that the scheme is future proof for increases in commuter demand. The consultation response can be read [here](#).²

Bifurcation of Port Traffic

ICE South East England support the bifurcation of port traffic and believe this will provide additional benefits during incidences requiring Operation Stack.

² [ICE South East England Response to the Lower Thames Crossing Consultation, March 2016](#)

Port Expansion

ICE South East England support port expansion, but as previously stated, call for KCC to ensure improvements are resilient to climate change.

A Solution to Operation Stack

ICE South East England has a number of concerns about the proposed lorry area at Stanford West as provided in our response to the consultation [here](#). Primarily, ICE South East England are concerned its lack of use when there is no unexpected incident, air quality issues due to the number of diesel vehicles on site and the cost of management and operation. Instead, the lorry area could be reduced in size and a Quickchange Moveable Barrier (QMB) system could be reintroduced to open up the M20.³

Provision for Overnight Lorry Parking

ICE South East England believe there is a link between this issue and the solution to Operation Stack and refer KCC to our response to the consultation.

Ashford International Station Signalling (Ashford Spurs)

ICE South East England agree with the upgrades to Ashford station, but ask KCC to consider which clusters of productivity the region should develop to assist in prioritising the infrastructure investment. In addition, Ashford could take pressure away from M25 if adequate room for parking was provided and more frequent services to Eurostar were arranged.

Journey time improvements and Thanet Parkway railway station

ICE South East England agree with these plans.

Rail and Bus Improvements

ICE South East England agrees with the devolution of bus services as a way of creating a more effective and efficient system. QBPs and PIPs are good ways of improving service, but KCC should also consider the use of smart ticketing.

In addition, ICE South East England believe the following strategic Priorities should be added:

Improving East to West Railway connectivity around London.

There is a growing demand for travel to Kent from around the UK. The Local Transport Plan emphasises improving radial routes between London and Folkestone, but there are areas within Kent that are poorly served by the East to West line from Brighton to Ashford. This has led to a reliance on the M25 and M20, increasing congestion on a route that is already over capacity. By improving this line, more business will be attracted to Kent as an option outside of London.

³ [ICE South East England Response to the Stanford West Lorry Area Consultation, September 2016](#)

Q6. To what extent do you agree or disagree with the Kent-Wide Priorities for the Local Transport Plan? (Pages 22 to 23 in the LTP)

Please select **one** box.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q6a. Please add any comments on the Kent-Wide Priorities for the Local Transport Plan below:

Please specify which **Kent-Wide priorities** you are commenting on.

Active Travel

The Local Transport Plan highlights the Active Travel Strategy, but as previously stated, the Plan should embed active travel into all major transport infrastructure improvements so that the network encourages cycling and walking to the maximum extent possible.

Aviation

The Local Transport Strategy needs to be updated to consider the Government's support for Heathrow expansion. The Strategy should assess how airports in the County can respond and whether future expansion or better transport connectivity for these airports will be required.

Q7. To what extent do you agree or disagree with the District Priorities for the Local Transport Plan? (Pages 24 to 50 in the LTP)

Please select **one** box.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q7a. Please add any comments on the District Priorities for the Local Transport Plan below:

Please specify which **district** you are commenting on.

As a membership organisation, ICE South East England provides expert advice on strategic regional infrastructure decisions and as such has chosen not to comment on individual district priorities. However, we ask that KCC consider the findings of the Thames Estuary 2050 Growth Commission when produced and considers creating high productivity clusters in the County.

Q8. We have completed an initial Equality Impact Assessment (EqIA) for the draft Local Transport Plan 4. An EqIA is a tool to assess the impact any policies or strategies would have on the following protected characteristics: race, age, disability, gender, gender reassignment, sexual orientation, religion or belief and carer's responsibilities. The EqIA is available at kent.gov.uk/localtransportplan or in hard copy on request.

We welcome your views, please add any comments below:

No comment

Q9. We have completed a draft Strategic Environmental Assessment (SEA). A SEA is a process to ensure that significant environmental affects arising from policies, plans and programmes are identified, assessed, mitigated, communicated to decision makers and monitored. The SEA is available at kent.gov.uk/localtransportplan or in hard copy on request.

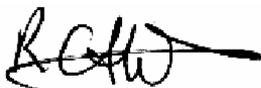
We welcome your views, please add any comments below:

No comment

Q10. Please add any final comments you have on the Local Transport Plan below:

ICE South East England would like to emphasise the differing challenges across the County. In West Kent, the relationship to London has provided a number of issues, including congestion, air pollution and housing need whilst East Kent has the challenges of dealing with incidents creating Operation Stack, improving economic growth and productivity. Improving transport infrastructure is an effective way of spurring regeneration, business investment and productivity improvements. The Local Transport Plan should be tailored to resolving these differing issues by generating acting as a catalyst for economic growth.

Yours sincerely,



Rod Hulse
Chair, ICE South East England Transport Panel

Signed on behalf of the ICE South East England Transport Panel:

- Rod Hulse (Chair)
- Rob Avery, London Bridge Associates (Vice Chair)
- Irimi Alexopoulou, Aecom
- Dave Darnell, WSP | Parsons Brinckerhoff
- Ray Powell, Infrata
- Deepu Prabhakaran, TRL
- Mike Stephens

The content of this document represent the views of the Panel and not those of the employers named above.

Contact

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