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**Consultation response from the Kent branch of the Campaign to Protect Rural England:  
M20 Lorry Area.**

Dear Sirs,

This submission in response to your consultation is offered on behalf of the Kent Branch of the Campaign to Protect Rural England, part of the national CPRE network. Within Kent we represent nearly 3,000 individual members, 189 Parish Councils and 40 local amenity groups and civic societies.

We fully acknowledge that the unprecedented disruption to Kent's transport network in the summer of 2015 was intolerable. However we retain our conviction that a single permanent lorry park for use in the event that Operation Stack needs to be implemented is the wrong solution to the wrong problem.

Kent is an inevitable and unavoidable bottleneck in the flow of traffic between the UK and the rest of mainland Europe, and the high and rising volume of road-borne freight transiting this bottleneck is the most important issue that needs to be addressed.

The disruptions that resulted from the lengthy implementation of Operation Stack in 2015 served to demonstrate the fragility of the logistics industry's reliance on this concentrated route. Instead of an expensive and damaging lorry park, we call for a solution which would offer real resilience to the nation's trade and transport links and offer flexible alternatives to the logistics industry, both now and in the future.

We believe that investment should instead be made into mandatory improvements in fleet management practices, so that no HGV driver benefits from racing to be nearest the front of a physical queue in Kent in the event of delays in the normal operations of the crossings. Fleet

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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logistics are already supported by the availability of GPS, tachographs and a wide range of communications technology; it would be a simple matter to mandate compulsory management systems which allowed drivers intending to use the channel (or any other) crossings to secure a place in a 'virtual queue' and be called forward in a timely manner when crossing capacity is available. These management practices would need to be underpinned by a network of serviced truck stops in Kent and beyond, with some overspill capacity in the event of disruptions to the normal operations of the channel crossings. The construction/expansion of this network of truck stops would have the additional benefit of attracting commercial investment rather than relying entirely on public money.

This solution would also resolve two of the other issues which affect Kent so negatively. Firstly, it would offer a means to put an end to the anti-social 'fly parking' of HGVs which blights Kent's roads, and secondly it would remove the need for the implementation of 'Dover TAP' which holds HGVs back in the A20 approaching Dover; while this limits air pollution from HGVs in the centre of Dover, it causes delays to other road users and merely shifts the air pollution to other areas, such as Aycliffe.

We object in the strongest terms to the significant expenditure of public money on a built solution, in the marked absence of a transport strategy that does anything other than support and indeed encourage the steady growth of road based freight through the bottleneck that is Kent over more sustainable alternatives.

Nevertheless, our responses to your consultation questions follow.

**Question 1: Do you have any comments on the indicative layout of the lorry area?**

No.

**Question 2: Do you have any comments on the environmental impact of the proposals?**

**Question 3: Do you have any comments on additional measures we could take to further mitigate the environmental impact of the proposals?**

Our responses to both these questions should be taken together. We have significant concerns about the effects of construction and operation of this site on hydrogeology and flood risk management.

The proposed lorry park is located in the headwaters of the East Stour River, at a site underlain by approximately 30 – 40m of Folkestone Beds, an important aquifer comprising ferruginous sands with concretions of limestone and chalk. Most of this is overlain by a thin (3 - 5m) irregular cover of Head Brickearth (mainly fine sands and silts). The entire profile of permeable granular sediment acts as a natural reservoir of groundwater, which has, in the recent past, supported abstraction for public supply; and continues to provide 'base flow' for the Upper East Stour – an important element of the water resources of this region. Any measures to reduce the surface permeability of the site will also be detrimental by increasing flood runoff in an already flashy catchment (hence

the Aldington Flood Storage Reservoir (FSR)). Moreover the corresponding reduction in the natural recharge of the aquifer will have consequences for low flows in the river and the lawful interests of any abstractors dependent on that resource.

The entire system, by virtue of its permeability, is vulnerable to pollution by any hazardous materials discharged from the parked vehicles, and unless these can be wholly contained and controlled will result in the permanent and irreversible contamination of the aquifer. The extent and severity of that risk will almost inevitably increase with the frequency of use of the facility. The continued and future operation and maintenance of petrol interceptors must be guaranteed, as well as measures to intercept and attenuate pollutant spills of other any pollutants which might well destroy the flora and fauna the 'vegetated SUDS feature' described in the project literature.

We have further specific observations pertinent to the Flood Risk Assessment (Appendix 13.1 to the Environmental Assessment). These comments relate to individual paragraphs of the FRA, with the paragraph number reproduced against each comment:

2.3.1. The Project must satisfy the Exception Test "*insofar that a site-specific FRA must demonstrate that the development will be safe .... without increasing flood risk elsewhere*". The FRA in practice fails to demonstrate this with respect to the Aldington FSR, and our reasons for coming to this conclusion are set out in the comments that follow.

3.4.2. The proposed 400 metre culvert on the Hayton Stream essentially increases the risk of flooding upstream due to loss of storage and possible loss on conveyance. Therefore either the culvert should be sized so that it does not negatively impact the flow and a debris screen must be introduced at the upstream end of the culvert to minimise risk of blockage due to debris.

3.4.7. Similar comments to those given above apply to the culverting of the un-named drain.

3.5.2. Similar comments to those given above apply to the proposed culvert extension crossing the East Stour River.

3.6.2. It is essential that any assessment of flood impact on Aldington FSR must include a climate change scenario.

3.10.3. The limit to the discharge into the East Stour is not clear in the FRA. This limit needs to be clearly defined to remove any confusion.

3.11.1. In the case of Aldington FSR the **run-off volume** from the development is as critical as the **peak run off rate**, in terms of downstream flood risk. This point is discussed further in later comments by this consultation response.

3.12.2. The figure stated of 48,300m<sup>3</sup> as the storage requirement for attenuation is not derived and is qualified. Yet this figure is a key criterion for the Project indicating that significant increases to storage on site are inevitable. This raises further significant

concerns for Aldington FSR operation as will be explained in our comments on the later paragraphs of the FRA.

3.14.6. Although the need for maintenance of the surface water drainage system is acknowledged, it is not stated who is responsible for maintenance and what this consists of in practice.

3.21.2. It is not only possible but inevitable that the Project will negatively affect the storage characteristics of Aldington FSR, as it will take far longer to empty the Reservoir in preparation to receive the next rainstorm run-off.

3.21.3. The calculation  $48300\text{m}^3/1.3\text{Mm}^3$  results in 3.7% of the total volume of Aldington FSR (not 1.3% as stated).

3.21.5. It is misleading to state that the impact of the Project will be negligible on the Aldington FSR simply because “the reservoir constantly discharges in flood” ( $3\text{-}4\text{m}^3/\text{s}$ ). **The additional flow volume from the Project alone will fill the Aldington FSR more quickly and take longer (several hours) to empty.** This is critical when the Aldington FSR has to deal with multiple storms arriving every 48 to 72 hours from the Western Approaches of the Atlantic. A longer emptying period means that storage is lost for the next storm, so the effectiveness of the Aldington FSR is significantly reduced for subsequent flood events. **This applies to the mitigation works for the Project as they only reduce the peak flows not the volume.** In practice, the flow volumes will increase into the Aldington FSR. The impact therefore needs full investigation in co-operation with the EA who operate the FSR, to satisfy all consultees in the Project, that the flood risk of all downstream from the project is not compromised.

4.1.9. The FRA states *“It is judged that the Project is unlikely to negatively impact upon the operation of the Aldington Flood Storage Reservoir, due to the mitigation measures proposed in the Drainage Strategy and the attenuation of runoff provided by on-site storage.”* This statement is plainly incorrect for the reasons explained above.

To summarise our comments on the FRA, it is evident that flood mitigation measures on-site do not adequately deal with increased run-off flow volumes from the development, and in particular adversely affect the Aldington FSR. One solution is to increase the capacity of the Aldington FSR, with the lorry park project funding the cost of these works. The flood risk of Ashford and all downstream must be properly maintained.

**Question 4: Regarding the management of the site, do you have any comments on: a. Traffic management b. Security c. Operation of overnight parking d. Management in general?**

Please see our comments under Question 8.

**Question 5: Do you have any comments on the facilities that should be provided at the site?**

No.

**Question 6: Do you have any comments on how the operation of the site should be kept under review?**

The project documents acknowledge that the harm to environment, local amenity, landscape and highly sensitive heritage assets will be considerable, despite attempts at mitigation. Because of the severity of these adverse impacts of this project, it is imperative that should the site no longer serve the purpose for which it was intended, guarantees must be made that the site will revert to its original agricultural use and not become designated as brownfield.

**Question 7: Do you have any comments on our equality and diversity proposals?**

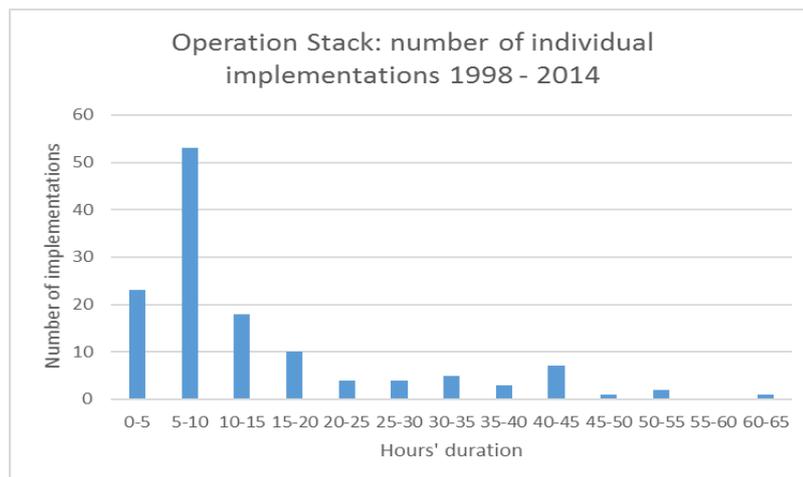
No.

**Question 8: Do you have any other comments?**

8.1 Scaling

We query the arbitrary way in which a target figure of 3,600 HGV parking spaces has been derived. The delays of 2015 were unprecedented, and no other instances of Operation Stack on that scale have occurred since its first implementation in 1998.

Until 2015, the vast majority of implementations have been of short duration (see graph below)<sup>1</sup>, and the HGVs delayed during those disruptions could be accommodated in the series of dispersed HGV parks that we describe in the first section of this response.



However, as the consultation document acknowledges, some 11,000 lorries per day use the channel crossings, a number which is projected to double by 2025. If this rate of increase is not just accommodated but actively supported, it is apparent that in the event of the exceptional circumstances that this facility is intended to handle, it would be rapidly overwhelmed, potentially returning Kent to the same unacceptable congestion and motorway closures that were

<sup>1</sup> Source: Kent County Council data

experienced in 2015. Again, we contend that intelligent fleet management, supported by a network of truck stops dispersed around the highways network would deliver significantly more resilience and flexibility in the event of unpredictable circumstances affecting channel crossings in the future.

## 8.2 Public Rights of Way

We are hugely concerned that the public rights of way that cross the site are effectively being extinguished, since there is a very real possibility that the northern part of the site, if constructed, will be put into use for overnight parking and thus access to the PROWs will be closed in perpetuity. Even if the PROWs remain in use, their character and attractiveness will have been utterly destroyed.

The potential of the loss of the bridleway is a particular cause for concern, as there are so few alternative bridleways in the area. Because of this, we would urge that permanent (and non-intermittent) provision should be made for an alternative bridleway around the perimeter of the site, with surfaces that are suitable and safe for equestrian use. Concrete or tarmac might be preferred surfaces for cyclists, but they are unsuitable for horses because of the potential for concussion damage to hooves. The surface of the lorry park will be designed to provide grip for vehicle tyres, not meta horse shoes, so will be dangerously slippery for horses. Any gates used to access the bridleway must be horse-friendly and capable of being opened and closed by a mounted rider.

## 8.3 Safeguarding of Agricultural Land

We wish to register our concern at the extensive loss of agricultural land, when future pressures of climate instability and food security will become ever-more important.