

Operation Stack: CPRE Kent Position Paper

The government's commitment to fund a solution to the problems of Operation Stack offers a 'one-time-only' opportunity. It is imperative that this solution addresses not just the symptoms, but the cause of the real problem, which is over-reliance on road-based freight travelling through Kent.

Background

The unprecedented scale of the implantation of Operation Stack in the summer of 2015 and its effects on the wider infrastructure and economy of Kent have been well documented. We were heartened to learn in the Chancellor's Autumn Statement that government was committed to setting aside funds to address this issue and in doing so recognising that this is a national, rather than a local problem.

This announcement was quickly followed by the publication of a consultation which tests the case for a single permanent lorry park to accommodate HGVs waiting to cross the Channel in the event of disruption to the smooth running of the channel crossings. We welcome the opportunity to contribute to this consultation and we are preparing a comprehensive response to the detailed questions, which will of course take full account of the fact that this is high quality agricultural land in open countryside and in the setting of the AONB. However in the meantime we are taking the opportunity to explore some of the wider matters surrounding these issues.

Operation Stack

The 'perfect storm' of industrial action and security breaches which simultaneously prevented the operation of both the channel tunnel and the Dover-Calais ferry links over extended periods in summer 2015 was unparalleled in the history of the operation of the channel crossings. The M20 and surrounding roads network was affected for a total of 32 days. Under normal conditions of operation, closures on the M20 are typically limited to 2-3 per year, affecting traffic for around 5-6 days or part days¹.

We recognise that the disruption that was occasioned to lives and livelihoods across Kent during this period was unacceptable and measures must be taken to ensure that such significant disruption is not allowed to recur. However we question whether a single large lorry park, which may only be called into use for a few days – if at all – in any year is the right solution. A better solution would offer real resilience to the logistics industry, rather than an 'end of pipe' fix which could be irrelevant under different market conditions.

Associated problems

Besides the obvious problems caused when the channel crossings are disrupted, the high volumes of road-based freight which pass through Kent are responsible for a number of additional issues in and around the county:

- Inappropriate 'fly parking' of HGVs
- Safety legislation which restricts drivers' hours, regulations which prohibit the movement of most HGVs in France between the hours of 10 p.m. Saturday and 10 p.m. Sunday, and the

¹ KCC report to Cabinet Committee on 13 Jan 2016

continuing security concerns around Calais mean that there is a disproportionate concentration of HGVs seeking to stop in or near Kent at all times, particularly at night and even more particularly at weekends. The shortage in provision of managed truck stop spaces leads to HGVs parking in inappropriate places, with consequent implications for driver welfare and nuisance to those seeking to make normal use of Kent's roads and lay-bys as well as to those who live and work in Kent.

- **Trailer exchange**
The logistics practice of exchanging trailers between predominantly EU and UK based tractor units to improve efficiency is contributing to further disruption to local communities and to damaged road surfaces when operated outside truck parks. This practice raises extreme safety concerns, with unlit trailers regularly deposited on the public highway.
- **Noise and air pollution**
Freight transport makes a significant contribution to air pollution exceedances. Any accumulation of heavy goods vehicles which need to keep their engines running will create localised pollution and vibration nuisance as long as their engines are running – for example when moving slowly in congested traffic, or when parked but needing to run a refrigeration unit. Measures to alleviate this problem within Dover town are inevitably causing problems of congestion and vehicle delays elsewhere on the roads network, with the A20 and the Aycliffe community now badly impacted by the regular use of the Dover TAP procedure.
- **Disproportionate wear & tear of roads**
The HGV road user levy, introduced in April 2014, has demonstrated that when a levy is universal and regulated HGV operators will pay. However the Treasury has not hypothecated this money to the provision of much-needed facilities or to the costs of maintenance of those roads.

We recognise that the current channel crossings present a fast and cheap means of transport for driver-accompanied freight, and it is self-evident that the logistics industry also recognises this. However, the fragility of the over-reliance on this route was also made evident in the summer's disruption. Over-reliance on the Dover Straits crossing has stifled investment in, and competition from, alternative ports and modes of freight movement that could spread the burden of freight on the UK's infrastructure.

The predominance of driver-accompanied HGVs in the current logistics market is the consequence of current market conditions which could change at any time. Industry responses to environmental, safety or security issues could rapidly make such traffic less economic and a single built solution could easily become an expensive and highly damaging white elephant.

Alternative solutions

While we welcome the commitment to invest in a solution to the problems of Operation Stack, we would urge that any solution is one that is 'future proofed', and does not become a convulsive reaction to the specific problems of 2015; Kent needs an outcome that will deliver the solutions to the problems of tomorrow, not the past.

According to DfT statistics freight traffic through the channel crossings continues to grow at 7- 8% per year. If freight through Kent's roads continues to grow at this rate then the permanent lorry park outlined in the December 2015 consultation could rapidly become overwhelmed, returning the roads network to the closures and disruptions already witnessed.

We contend that instead of the expensive and damaging construction of a single lorry park, investment should be made to:

- **Support a network of dispersed, serviced truck stops which operate on a commercial basis and which have some degree of overflow capacity in the event of disruption to the channel crossings. Many shippers prohibit trucks stopping within 120km of Calais. Similar measures should be employed to hold vehicles outside the Channel Corridor until called forward**

This would also have the benefit of allowing a resolution to the problems of 'fly parking' of HGVs and bring considerable improvements to the welfare of drivers as well as ending the nuisance of parking in un-serviced locations. We recognise that some overseas drivers are reluctant to pay for overnight parking, but an adjustment to the HGV road user levy, which has achieved extraordinarily high degrees of compliance since its implementation, could be a simple way to address this. It is recommended that it is responsibility of the international shipper community to protect their drivers and their loads and vehicles from harm, whether directly or through their service providers. This could be achieved by providing a mandatory cashless system for access to registered secure truck parks, a telemetry link via the road user levy and tachograph systems.

- **Incentivise the use of alternative ports of entry and exit, as well as modal shift away from road-based freight**

The SE LEP as well as the DfT and Highways England have a role to play in ensuring that the UK's logistics network remains resilient. Existing roll-on roll-off ports should be incentivised to offer both driver-accompanied and unaccompanied trailer services at ports such as Newhaven, Ramsgate, Sheerness, Dartford, Portsmouth, Purfleet etc. There should also be support for roll-on roll-off freight facilities at new ports such as London Gateway. Any or all of these would offer alternative capacity, and would have the additional (and significant) benefit of reducing reliance on the Dartford crossings to access the British mainland's logistics centres.

- **Incentivise shippers to return to unaccompanied trailer operations across the Channel.**

Modern supply chain practice with track and trace has now re-secured this technique while maintaining predictability of delivery. An added benefit of this would be to boost UK employment of HGV drivers; it would also reduce emissions and air pollution.

- **Work with the logistics industry, fleet operators and drivers to implement 'smart queuing'**

The ubiquity of smart phones, GPS and communications technology should remove any need for drivers to compete to be nearest the front of any physical queue in Kent, when they could be called forward from dispersed serviced locations further afield and guaranteed timely passage across the channel.

- **Implement 'quick wins'**

We support the expansion of the existing Stop24 managed truck stop facility south of the M20 at J11, which could rapidly provide an easy partial solution provided its commercial operation were not to be prejudiced by government intervention.