

Managing freight vehicles through Kent: Response questionnaire December 2015
A Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford

Section 1:

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I wish to be notified about the outcomes of the consultation and the next steps by **email**

1. How did you find out about the consultation?

Read, saw or heard about it in the media (radio/television/newspapers)

2. What best describes your interest in filling out this questionnaire today?

This response is submitted on behalf of the Kent branch of the Campaign to Protect Rural England, an independent charity funded entirely by its members and supporters.

3. How often do you use any part of the M20 or A20 between Maidstone and Dover?

CPRE Kent's offices are situated on this stretch of the A20. Staff therefore use it daily to access their place of work. Members and active volunteers also regularly use the branch office for meetings and other activities.

Section 2: Current Operation Stack

4. How are you personally affected when Operation Stack operates (please tick all that apply)?

Significant disruption in accessing my place of work, in common with my work colleagues and those members and volunteers who use the office facilities.

5. Do you agree that the current Operation Stack should remain the main response to major disruption to cross channel traffic?

Strongly disagree.

The current Operation Stack, with the consequent closure of sections of the M20, places an unacceptable imposition on the lives and livelihoods of those who live and work in Kent. However this must in no way imply our endorsement of either of the sites or any of the alternative modes of operation identified in this consultation. We welcome the government's commitment to resolving this problem, and the recognition of the fact that this is a national (and indeed international) problem rather than one which is confined to Kent. However we recommend the thorough investigation of less damaging alternative options that would cause less disruption and would reduce or remove the need for the permanent built solution which forms the basis of this consultation (see our response to Question 14).

Section 3: Proposed lorry area

6. How much do you support or oppose the provision of a permanent lorry area to reduce or remove the need for freight traffic to be queued on the M20?

While we recognise that the disruption caused by the closure of the M20 during the implementation of Operation Stack is unacceptable, we strongly oppose the creation of a single permanent facility for occasional use by freight traffic (see our response to Question 14).

7. How many lorries do you consider that any lorry area should be able to accommodate at any given time?

N/A – see response to Question 12.

8. If such a facility is built, what would be your priorities in choosing a site location? Please rank 1 to 12 according to your preference, with 1 being most important and 12 being least.

This question is not applicable to our response, as we strongly object to the principle of any permanent large built facility as identified in this consultation.

9. Four main alternatives are under consideration for the way any lorry area could operate. Please rank these alternatives in order of preference, with 1 being your most favoured and 4 being your least favoured.

Again, CPRE Kent maintains its opposition in principle to the construction of a single large HGV park. However, the principle of provision of chargeable overnight parking for regular use (albeit at a number of smaller, dispersed locations) with additional overflow parking to which HGVs could be directed in the event of disruption to the channel crossings appears to be the most appropriate solution.

Under the options presented in this consultation, all of the alternative uses suggested in this consultation would result in an unacceptable concentration of noise, air and light pollution from 'stacked' HGVs (particularly in the case of those vehicles which even when stationary must run engines to maintain refrigeration). We share the concerns of the Kent Downs AONB Executive about the unacceptable degree of harm that would be caused to the setting of the AONB.

Our least favoured option is Alternative 1: (*Emergency lorry holding area which reduces or removes the need for Operation Stack only*) as it represents the worst-case option of permanently sacrificing high grade agricultural land for – potentially – only occasional use, and provides no respite from the problems of 'fly-parking' of HGVs which is currently a permanent nuisance.

Our preferred option would be a series of dispersed sites which could offer a wide range of options to drivers, from inexpensive and very basic to full-service truck stops with better facilities at higher costs. This will maximise the ability to manage 'fly parking' as well as providing resilience in the event of disruption to the channel crossings.

10. If you have any comments regarding the effects that any of the alternative uses may have on the existing and/or future provision of commercial or other lorry parking in the local or wider area, please use the space provided below.

Government intervention to deal with the occasional problem of Operation Stack must not be allowed to prejudice the commercial success of the existing network of truck stops in Kent and beyond, nor any similar smaller-scale facilities which could be provided in the future. These are essential if we are also to be able to resolve the intense and constant nuisance caused by inappropriate 'fly parking' around the channel corridors as well as the occasional blight of Operation Stack. Investment to support the delivery of additional overflow parking in appropriate locations within this network of truck stops could be a relatively inexpensive quick-win contribution to the problems, offering greater flexibility and resilience in the face of challenging commercial, safety and security pressures.

11. In addition to the minimum provision of toilets and hand washing, drinking water and refuse disposal, what facilities should be provided in any solution?

N/A

12. Do you agree that a lorry area would address the current traffic problems on the M20?

Disagree

While a permanent lorry area would indeed provide some opportunity to hold vehicles caught up in delays at the channel crossings, the arbitrary provision of 3,600 spaces as suggested cannot be the most effective solution to future instances of disruption to the normal operation of the channel crossings.

Traffic through both of the channel crossings is predicted to approximately double in the next decade. Disruptions on the scale of those seen in the summer of 2015 were entirely without precedent in the entire period (some 20 years) since Operation Stack was first used. As freight volumes through the channel crossings continue to increase, it is possible that disruptions of lesser magnitude or duration will still overwhelm a single built facility, and the M20 would once again need to be closed to accommodate delayed vehicles.

However, on average, Operation Stack has been implemented an average of 2-3 times per year, for a duration averaging 5-6 days or part-days, and in some years has not been implemented at all. A permanent built facility at either of the sites proposed could quickly become an expensive and highly damaging white elephant. We support instead the implementation of a solution that will offer real resilience to the logistics industry and to the nation's commercial interests (see our comments under Question 14 below).

13. Which site would you like to see progressed?

CPRE Kent does not support the use of either of the sites identified in the consultation. Both the alternatives identified would result in the permanent loss of a significant area of productive agricultural land in an area of extreme landscape sensitivity. We note also that while flooding and drainage issues within the suggested sites have been briefly considered, there is little if any consideration of the implications of large-scale built development at these sites for increasing flood risk further afield; built development in this area must not be allowed to affect the normal processes

of drainage and infiltration which underpin the operation of the River Stour Catchment Flood Management Plan.

CPRE Kent does not support the principle of a large single lorry park at any location. However we support the principle of a network of dispersed, serviced truck stops which operate on a commercial basis and which are incentivised to provide some degree of overflow capacity in the event of disruption to the channel crossings. The use of such a network could best be facilitated by fleet management techniques which are already available to logistics providers: please see our comments under Question 14 below.

Section 4: Any other comments

14. If you have any other comments you would like us to take into account, please use the space provided below:

The inevitable and extreme harm to the environment, amenity and landscape of either of the two sites proposed is, in our opinion, wholly disproportionate to the questionable benefit of having a single large site permanently available to accommodate delayed HGVs in the event of disruption to the normal operations of the channel crossings.

The funding pledged by national government in its 2015 Autumn Statement is nevertheless a welcome acknowledgement that this is a national problem, and not one that must be borne by Kent's tax and rate-payers and by the logistics industry in isolation. However this commitment, rather than focusing on funding a single large lorry park, could offer instead the opportunity for a future-proof solution, which will retain maximum flexibility and usefulness in the face of future pressures on the logistics industry and ensure greater resilience in the UK's supply networks.

Our recommendations for such a solution fall under the following three general headings:

14.1 Reduce the current over-reliance on existing channel crossings

Too much reliance is currently placed on the logistics bottleneck which is inevitably represented by the channel corridor and the channel crossings. It is our contention that dispersing this traffic to other modes and ports of access and exit would be a considerably more sustainable, less damaging and less expensive option than a permanent built lorry park.

Some 10,000 HGVs per day currently use the existing channel crossings of Eurotunnel and the Port of Dover, and projections for both ports indicate a doubling of throughput in the next ten years. Even under normal conditions of operation, this level of use regularly causes congestion, with queues of HGVs often backing up onto the M20 from the Eurotunnel exit and the frequent (several days a week) implementation of the 'Dover Traffic Assessment Project' system which deliberately holds ferry-bound HGVs on the inside lane of the A20. This practice alleviates congestion, noise and air pollution from HGVs within the town of Dover. The consequence of this, however, is air and noise pollution and traffic congestion further afield, most notably in Aycliffe. Under operating conditions which are disrupted or constrained for any reason, the amount of traffic arriving in Kent to use the crossings can rapidly exceed the capacity of the ports and delays and congestion ensue.

Highways England as well as the DfT and the SE LEP have a role to play in ensuring that the UK's logistics network remains resilient. There should be an overall policy objective of reducing the proportion of goods with an origin or destination in the north using ports in southern England. We contend that over-reliance on Kent's short, fast channel crossings has stifled investment in, and use of, other ports which in many cases are closer to the next destination of the goods in transit.

Existing roll-on roll-off ports such as Newhaven, Ramsgate, Sheerness, Dartford, Portsmouth, Purfleet etc. should be incentivised to offer both driver-accompanied and unaccompanied trailer services at ports. 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.

14.2 Support a network of dispersed commercial truck stops with overflow capacity

On the French side of the channel crossings, many shippers now prohibit their drivers from stopping within 120km of Calais because of security concerns. A network of secure, serviced truck stops is available which allows drivers safely to comply with drivers' hours and tachograph rules while still allowing safe and timely access to an available crossing.

A similar dispersed network of serviced truck stops within the UK road network should be supported to allow drivers a choice of opportunities to stop as necessary, but particularly in the event of delays at the crossings (see 14.3). This would also have the benefit of allowing a resolution to the problems of 'fly parking' of HGVs in Kent and beyond, bringing considerable improvements to the welfare of drivers as well as ending the considerable nuisance and danger of parking in un-serviced locations. Government intervention to support the creation of additional 'overflow' spaces at such truck stops for use in the event of disruption to the crossings, while maintaining the commercial viability of these operations, would be a far more sustainable solution than a single large lorry park.

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. We contend that it is the responsibility of the international logistics community to protect their drivers and their loads and vehicles from harm, whether directly or through their service providers. This could be facilitated by – for example – implementing a mandatory cashless system for access to registered secure truck parks or a telemetry link via the road user levy scheme.

14.3 Implement fleet management and virtual queuing

Joint working between Highways England and the logistics industry, including fleet operators and drivers, could rapidly and inexpensively allow 'smart queuing' on this side of the channel. The widespread availability 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 locations further afield and guaranteed timely passage across the channel via the issue of a 'virtual ticket'. Drivers would also be guaranteed immeasurably improved comfort and convenience if awaiting their opportunity to use the crossings in serviced truck stops.