

Date: 20 January 2016
Our ref: 176180
Your ref: -



M20 Lorry Area
Highways England
Bridge House
1 Walnut Tree Close
Guildford
Surrey GU1 4LZ

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

By email only, no hard copy to follow

Dear Sir or Madam

Managing freight vehicles through Kent – A Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have provided below our advice on the measures which we consider should be considered fully, irrespective of which option, Stanford West or M20 Junction 11 North is progressed and whether or not Dover TAP (Traffic Assessment Project) is incorporated and trust this is helpful.

Natural England will continue working with all partners to try and ensure that an environmentally sustainable scheme which minimises the landscape and ecological is delivered. The location and design of the scheme which progresses should be guided by the landscape and ecological matters in addition to the operational requirements.

Kent Downs Area of Outstanding Natural Beauty

Both the Stanford West and M20 Junction 11 North options are likely to have implications for the Kent Downs Area of Outstanding Natural Beauty (AONB) with these likely to be greatest for the M20 Junction 11 North option.

The special qualities of the Kent Downs AONB include views to and from the scarp slope and as such, this development has the potential to result in significant landscape impacts. Consequently, Natural England advises that, irrespective of which scheme/combination of schemes progresses the following measures should be fully explored:

- Softer engineering options such as reinforced grass surfaces are used for all areas of the site that will not be used as the commercial lorry park or for Dover TAP.
- Breaking up the areas of the site which will not be used as the permanent lorry park with significant blocks of planting within the site itself to help mitigate impacts from more distant viewpoints.
- Creation of a woodland shaw(s) in keeping with the locality to help soften the boundary of the site rather than creating linear boundary edges.
- Undertaking landscape mitigation in the wider area, outside the confines of the scheme boundary such as linking existing woodland blocks or reconnecting severed hedgerows in agreement with the landowner. This may help mitigate more distant views to and from the

Page 1 of 2



Natural England is accredited to the Cabinet Office Service Excellence Standard

AONB.

- Ensuring that any landscape planting/mitigation measures link into the wider habitat network to ensure that opportunities to provide ecological corridors are maximised.
- Use of innovative technology such as mobile infrastructure (lighting columns, facilities etc) which will only be present on the site when it is operational.

Gibbin's Brook Site of Special Scientific Interest

The Stanford West site comes within 100 metres of Gibbin's Brook Site of Special Scientific Interest (SSSI) which is of importance for its fen, acid grassland and alder carr habitats.

The proposal has the potential to indirectly impact the SSSI through a variety of pathways including:

- Damage to habitats and urbanising effects from drivers who may access the SSSI on the network of public rights of way whilst the facility is in use.
- Water quality impacts from contaminated run-off leaving the lorry park which may then enter the SSSI.
- Air quality impacts that could result from the operation of the facility, including the impacts that may derive from refrigerated units.

Natural England therefore advises that the scheme should ensure that measures are incorporated to avoid impacts to the SSSI wherever possible along with mitigation for any impacts that cannot be avoided. There may also be opportunities to deliver beneficial management of the SSSI (in agreement with the landowners) which should be explored fully.

Protected species

Based upon aerial photographs and our visit to the site, there are habitats present which may support protected species and these will need to be fully considered as part of the scheme. Natural England has published protected species [Standing Advice](#) which provides guidance on the types of habitat where protected species may be found and details on the survey and mitigation measures for most protected species which may be helpful.

Landscape and biodiversity enhancements

As mentioned above, there appear to be opportunities to incorporate features into the design which could deliver landscape enhancements or provide opportunities for wildlife (above any mitigation measures which may be required). We recommend that these opportunities are fully explored and delivered wherever possible.

I trust these comments are helpful and we would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Sean Hanna on 0208 0266 064 or by email to sean.hanna@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Sean Hanna

Sean Hanna
Lead Adviser
Sussex and Kent Team

cc Katie Miller, Kent Downs AONB Unit
Niall Connolly, Environment Agency