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### **Managing freight vehicles through Kent, Response questionnaire date December 2015**

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SPC would like to be informed about the outcomes of the consultation **by email**.

SPC are opposed to the provision of an off-road lorry area near the Port of Dover and Eurotunnel terminal to help reduce or remove the need to queue lorries on the M20 in the procedure known as 'Operation Stack'. This opposition is because we do not believe that the proposed lorry park will provide a solution to Operation Stack as it addresses a symptom and not the underlying causes of Operation Stack. We are further opposed to the proposal because we believe that it result in long term environmental and health issue for Stanford, surrounding villages and their residents. In addition SPC submit that neither of the sites proposed are acceptable, as a result of their impact on residential amenity from noise, air and light pollution, visual impact on the adjacent AONB and non-compliance with highway safety standards.

Prior to 2015 Operation Stack has been implemented on average twice a year in the last 20 years. This is usually due to bad weather and operational disruption to the Channel Tunnel of ferry services. In 2015 Operation Stack was employed on a record 32 days including three implementations lasting five days. This record number of implementations was due to man-made causes on the French side of the Channel, namely migrant incursions to the Channel Tunnel and industrial action by French ferry workers.

SPC believe the correct solution to Operation Stack is a strategic package of measures designed to address the underlying causes and deliver the capacity, flexibility and resilience across our regional freight transport infrastructure which a single large lorry park cannot. This solution should include:

- Improvements to the A2/M2 to provide a viable alternative for freight traffic heading to Dover and the Channel Tunnel.
- A network of smaller lorry parks across the South East and further North to relieve pressure throughout road network.
- Regeneration of existing ports in the South East to increase freight ferry capacity freight.
- Use of smart Technology using data provided by port operators so that hauliers may better manage their lorry fleets at distance from Channel Ports and Tunnel.
- Investment in rail freight infrastructure.

More details of specific measures are included in the answers the individual consultation questions below. We also include an alternate Lorry Park solution which we commissioned Peter Brett Associates and Ian Bull Consultancy to produce on our behalf. It should be noted that this solution is provided as a preferred alternative to the two sites proposed by Highways England (HE) in the event that following this consultation HE concludes that the preferred solution remains that of a single large lorry park rather than the strategic solution outlined above.

1. *Q: How did you find out about the consultation?*  
A: Other: Through meetings with Shepway District Council (SDC)
2. *Q: What best describes your interest in filling out this questionnaire today?*  
A: SPC represents the interests of Stanford residents. Our village is the closest to both sites proposed by HE and will be directly and adversely impacted by the development of a lorry park on either site.
3. *Q: How often do you use any part of the M20 or A20 between Maidstone and Dover?*  
A: The majority of our residents use the M20 or A20 on daily basis.
4. *Q: How are you personally affected when Operation Stack operates (please tick all that apply)?*  
A: Other. Our residents are all directly affected by Operation Stack to including the following aspects Social life, Work Life, Home Life, business owners.

Explanation for response: It is impossible for Stanford residents travel West, East or South from the village without requiring access to the M20 via junction 11 using the A20. Consequently our daily lives are affected particularly when junction 11 becomes grid locked or the exit ramps to junction 11 are blocked. Use of the B2068 running North from the village towards Canterbury can also be comprised during Operation Stack due to increased traffic attempting to find alternate routes. However, one of the main reasons for junction 11 becoming gridlocked is poor management of Operation Stack by Kent Police. The junction is frequently unmanned during Operation Stack and often when there is a police presence they remain in their vehicles rather than manage the traffic flow. There is a perception that Kent Police are happy to see Operation Stack fail so that it taken off their hands.

5. *Q: Do you agree that the current Operation Stack should remain the main response to major disruption to cross channel traffic?*  
A: Neither agree or disagree.

Explanation for response: SPC believe that now the Government have made £250m available to tackle the issues associated with major disruption to cross channel traffic there is a golden opportunity to provide strategic improvements to the freight transport network. If this is done then even during periods of major disruption there will be greater capacity and flexibility to keep freight traffic moving. In those circumstances the occasions when it will be

necessary to resort to Operation Stack will be minimised. Constructing a lorry park will not do this as the causes have not been addressed.

Although, as mentioned above, our residents are all directly impacted by Operation Stack at its normal frequency of implementation it is an inconvenience that we can cope with as a community. The problems associated with Operation Stack became intolerable given the circumstances experienced during 2015 resulting in a record number of implementations and the closing of the M20 in both directions. However, these activities were caused by the joint man made events of migrant incursions to the Channel Tunnel and industrial action by French ferry workers. These causes should be resolved by the Government working with the French authorities to ensure they do not reoccur rather than spending £250m of UK tax payers' money on a "sticking plaster" solution. Further, the impact of a repeat of the circumstances of 2015 can be mitigated by improvements in our strategic freight transport network such as development of other ports and new ferry operators to provide increased cross channel freight capacity to reduce dependency on the port of Dover and the Channel Tunnel.

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

A: Strongly oppose.

Explanation for response: SPC strongly opposes the provision of a single permanent lorry park for 3600 vehicles as it will not solve the problems of Operation Stack. It will not solve the problems of Operation Stack for the following reasons:

- In the event of a repeat of the circumstances experienced in 2015 it will reach capacity within half a day (HE admit there are at least 6,000 coast bound lorry movements per day on the M20 each day and that number is increasing). Therefore, we will still see lorries stacked on the M20 and in circumstances where Stack is in force for multiple days it is likely that both carriageways will be closed.
- A single lorry park represents a single point of failure. In the event of traffic disruption due to accidents or breakdowns on the M20 to the West of the lorry park, or on the entrance slip road to the lorry park itself, lorries will be unable to access the lorry park resulting in the traditional on carriageway problems associated with Operation Stack.

A more robust use of lorry parks as part of a strategic solution would be to have a dispersed network of smaller lorry parks throughout the region combined with a technology based electronic ticketing and movement management system that assures lorry drivers of their place in the queue. This would remove the need for drivers to get to Kent as soon as they can to secure their place, which merely adds to the problems of congestion. It would also allow pressure to be relieved along the entire transport network and not be vulnerable to a single on carriageway traffic incident. It also provides a flexible answer to the issue of overnight lorry parking capacity as it allows drivers to better manage their drivers' hours and enforced rest periods which are statutory for reasons of road safety more easily.

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

A: Less than the suggested minimum 3,600

Explanation for response: The provision of single large lorry park as proposed will not only fail to solve the problems associated with Operation Stack but also have significant and dangerous environmental and health impacts. A lorry park of this size is unprecedented at four times the size of any similar facility in the UK. The World Health Authority & the British Medical Council have linked Diesel emissions to 28,000 premature deaths in the UK each

year. Diesel HGV traffic produces the largest amount of emissions of Nitrogen Dioxide and particulate matter 2.5 that are extremely harmful to public health. Particulate 2.5 which are produced by diesel engines are so small that the human lung cannot filter them and thus they go straight into the blood stream and are directly linked to cancers, heart disease and lung disease. There is no safe limit to these particulates entering the human body. The proposed lorry park will result in a significant increase in emissions over and above the current level from the traffic using M20 and the associated health and safety hazards would greatly increase the risk to the village communities of Sellindge, Stanford and Westenhanger and without doubt, cause the premature death of its residents. These pollutants cause most harm to the young and elderly. Sellindge has both a primary school and a substantial elderly demographic population. Given the risks we consider the proposal to be in breach of Article 2 of the European Convention of Human rights under which public authorities should consider individuals' right to life when making decisions that might put them in danger or which affect their life expectancy.

8. *Q: If such a facility is built, what would be your priorities in choosing a site location? Please rank 1 to 12.*

- A: 1. Minimises visual/landscape impact  
 2. Minimises the impact on residential amenity  
 3. Minimises other environmental impacts  
 4. Maximise road safety  
 5. Most effective in reducing delays to local roads such as in Dover and Folkestone  
 6. Use of the facility has minimal impact on local roads  
 7. Provide overnight lorry parking  
 8. Reducing the attractiveness of local roads as somewhere lorry drivers like to park and offering somewhere relatively comfortable and safe for lorry drivers to rest  
 9. Least overall cost  
 10. Most effective in keeping the M20 open  
 11. Providing an income to the taxpayer from parking and other services

9. *Q: 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.*

A: None of the four alternatives are favoured by SPC

Explanation for response: SPC is opposed to the proposed large lorry park on the sites suggested by HE for the reasons set out in other sections of this response. Therefore, we cannot favour options for its use. If such a facility was built we would only accept its use for Alternative 1: Emergency use in order to minimise the environmental health impact to residents. The fact that the proposed lorry park is being suggested for use that includes General Disruption and Overnight Parking demonstrates that it is not a viable solution to the problems associated with Operation Stack and, therefore, not an effective use of £250m of Tax Payers money. It is an admission that its use for Operation Stack would be minimal and that it needs to generate income from overnight parking fees to pay for its ongoing operation and maintenance. This effectively places the proposal in direct (and unfair) competition with commercial lorry park operators who are looking to expand their business, which is an inappropriate use of Highways Act powers and public funds.

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

A: Any of the alternative uses of the proposed lorry park that include provision of overnight lorry parking will have a direct impact on the provision of commercial lorry parking with the region. At present the local commercial operators (STOP24 and Ashford Truck Stop) have been attempting to expand their facilities to provide a total of 1600 additional lorry parking spaces. This would provide sufficient capacity to resolve the current overnight

parking shortfall in Kent which is estimated to be approximately 800 vehicles. However, both of these expansion proposals have been shelved due to the proposal to build a Government funded lorry park. The issue of overnight lorry parking and its associated problems of damage to local roads, verges, noise, littering and human waste is a daily problem for the residents of Stanford and all communities along the routes to the ports. It is a more pressing issue than Operation Stack. It is inappropriate that commercial plans that would provide capacity to rectify this problem should be disrupted by HE's proposal to build a lorry park using Tax Payers money. The legality of using public funds in such a way must be in question.

It should be noted that the lack of effective enforcement of traffic regulations within Kent contributes to the overnight lorry parking issue and will continue to do so whether capacity is provided by the private or public sector. Many foreign lorry drivers park illegally overnight because they do not wish to pay for lorry parking. Therefore, there is a clear need for effective enforcement measures in conjunction with lorry parking capacity to effectively solve the overnight parking issue. Since Shepway District Council began enforcement of parking restrictions for overnight lorry parking the number of lorries turned away from Stop 24 at Junction 11 each night has risen from around 30 to over 100. This demonstrates that enforcement makes lorry drivers look for legitimate facilities. Even when there has been space at these parks some drivers have preferred to park around the edges rather than pay the charge. Residents already experience noise from HGV traffic looking for parking both day and night. Lorries should be required to have a planned journey with booked overnight parking.

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

A: Other.

Explanation for response: As SPC opposes the proposal in the event that it was progressed we would only support the provisions of facilities that would contribute to minimising the size of the site and the environmental impact such as toilets, basic washing facilities and adequate refuse collection.

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

A: Strongly disagree.

Explanation for response: As detailed in the other sections of this response SPC are strongly opposed to this proposal as we do not believe it will effectively address the problems of Operation Stack. In summary this is because:

- It does not provide sufficient capacity to deal with the situation that developed in 2015 or to deal with forecast increases in freight traffic.
- A single large lorry park represents a single point of failure in our freight transport network which could easily be rendered unusable by traffic disruption upstream on the M20 and is therefore lacks resilience or flexibility
- It is a tactical and not strategic solution which fails to address any of the underlying causes of Operation Stack and therefore does not represent good value for money.

Additionally due to the alternative uses put forward in Question 9 it appears that this consultation is focused on a solution to Operation Stack with the secondary objective of resolving overnight fly parking locally. However, if the overnight lorry parking issue was prioritised for resolution, wherever it occurs, the only logical solution that also accommodates the statutory requirements of drivers' hours/rest periods is a dispersed network of small lorry parks which would then have the secondary benefit of being available when Operation Stack is implemented.

13. *Q: Which site would you like to see progressed?*

A: None, SPC do not want to see a site progressed.

Explanation for response: As stated in the other sections of this response SPC opposes HE's proposals to build a lorry park for 3,600 lorries. This is because we believe it will neither address nor solve the causes of Operation Stack. We do believe that a dispersed network of lorry parks would contribute to solving the issues of Operation Stack as part of a wider package of strategic initiatives. Consequently in the event that HE conclude from this consultation that a Lorry Park is the only viable solution to Operation Stack we have commissioned a proposal for a third lorry park solution that would provide greater capacity than required in HE's proposal but across several sites all within the required proximity to the Channel Tunnel and Port of Dover. Additionally this alternative does not include (or require) a new bridge over the M20 as with HE's site 1 (Stanford West).

The details of this proposal are contained in the following attachments to this response's covering email:

1. M20 lorry park to HE
2. Stanford PC Technical Reps 20-01-2016
3. Op Stack – Figure 1 V2
4. Op Stack – Figure 2
5. Op Stack – Figure 3

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

A: In addition to our specific reasons for opposing this proposal SPC has the following additional comments:

- We are very concerned about the way HE have conducted this consultation. The consultation has taken place over the Christmas period and the timings have meant that the ability of ourselves and other local communities to respond effectively has been severely impacted, not least as HE and other Government stakeholders effectively close down for two weeks over Christmas and are unable to respond queries and information requests.
- The quality of information provided by HE in the consultation document is poor. It shows the sites as two 'blobs' with no detail. HE say they cannot give detail until they know which site and which alternative. This is absurd. They can and should show a layout for each alternative and a description of how frequently and at what hours it would be used so that people can make a properly informed response. A scheme of this magnitude and cost should have more detail. Similarly HE should have made reference to other sites that they had examined as this may have helped residents understand why these two sites were chosen in preference to others.
- By choosing a non-statutory consultation HE have caused blight to many householders but do not have to compensate them until (and only if) an actual site has been chosen and in operation for 12 months. The announcement by the chancellor on 25 November and this consultation published on 11 December have already caused blight. Some people have lost house sales and many are fearful of the future with so little detail available for the plans. Villagers in the surrounding areas should have a scheme of compensation similar to that put in place for the building of the Channel Tunnel and it should start now. It should not just be immediate householders that are compensated for the loss of countryside, the local

community and the wider district should receive an absolute assurance that they will not be called upon to lose any more countryside for lorry parking and they should have all the existing damage to the roads and verges made good both now and in the future in recognition of the sacrifice of such a large area of open countryside.

- A traffic management system is needed and a proper review of international freight traffic should be conducted by the UK Government. It is absurd to channel everything down one corridor and for both the Port of Dover and Eurotunnel to grow their traffic beyond the capacity of the surrounding road infrastructure. The Port of Dover in particular should take more responsibility for providing additional lorry parking facilities.
- The very least the Government should do is proceed 'at pace' to build the Lower Thames crossing at the most easterly point proposed so that lorry traffic seeking the Midlands and North does not have to use the M20 and M25. The A2/M2 should be upgraded so that journey times are at least as fast as the M20 which would encourage traffic to be more equally spread between these routes. More fundamentally the Government should review international freight flows.
- The scale of this proposal encompassing close to 4000 lorries and their drivers in a temporary settlement the size of a small town presents a number risks in respect of security, policing and provision of emergency services in the event of a major incident such as a fire. The HE proposal contains no consideration of the following factors which should be addressed urgently for reasons of safety and security:
  - A transient population of 4,000 predominantly adult males will inevitably include criminal elements and pose a real threat to the safety and security of our communities (particularly if the lorry park is used 24/7 for overnight parking). We are aware that smaller lorry parks already attract sex workers. There needs to be assurances that adequate resources will be made available to effectively police such a potentially volatile site. It is not credible that Kent Police believe that it will require less resources to police the site compared to the existing Operation Stack where individuals are naturally dispersed over a wide area which is inaccessible to sex workers or drug dealers.
  - The Home Office definition of a crowded place is 'a location or environment to which members of the public have access that may be considered potentially liable to terrorist attack by virtue of its crowd density' includes transport hubs such as the proposed lorry park. They are an attractive target for international terrorists because of their ease of access, little protective security and the prospect for high casualty rates and political impact in the event of a successful attack. What measures will be put in place to secure the lorry park against potential attack?
  - Lorry fires are relatively common and the fire risk presented by the lorry park is considerable. Any fire spread would be almost impossible to contain with the vehicles closely stacked and approaching lorries from the side is not safe because of projectile risks from the wheels. Effective fire fighting would require large amounts of foam and it is unlikely because of the foam and the complexity of the layout that breathing apparatus crews would be committed to the middle of the fire. Although vehicles at the periphery may be able to be moved the approach would probably be one of "containment". Both carriageways of the motorway would potentially need to be closed, owing to the proximity of the lorry park. "Containment" essentially means letting the fire burn itself out, which given the number of vehicles and diverse cargoes would have a huge environmental impact. At the very least, a lorry fire would render the park unusable and mean a reversion to the existing Operation Stack.

- Vehicles carrying hazardous materials/chemicals will need to be segregated and parked with adequate space to allow easy access in case of spillages or fire. As the prevailing wind direction in this area is from the SW Stanford is directly in line (and in close proximity) with any toxic fumes resulting from a hazardous materials incident.
- In the event that this proposal progresses the landscaping and screening of any lorry holding area must be to the highest standard. Security needs to be high to ensure this large flat area is not used by those wanting to hold raves, races or other activities. Air quality will need to be monitored and vehicles made to turn off engines (trickle feed must be provided for refrigeration units so that engines can be turned off). Management of the lorry holding area will need to be firm to ensure horns are not sounded in frustration.
- There needs to be effective enforcement to ensure lorries do not seek to evade using the lorry holding area by using alternate routes. At meetings, HE has said that ANPR (Automatic Number Plate Recognition) can be used to enforce compliance and this should be a condition if the lorry holding area is built. It is also important that local lorries can access the lorry holding area without having to go up to Ashford and then down again (this reinforces the need for some form of electronic ticketing).