

## **Managing Freight Vehicles through Kent Response to Highways England, January 2016**

**Name:** Graham Horner

**Address:** Kennett House, Kennett Lane, Stanford, TN25 6DG

**email:** graham@hornercs.co.uk (preferred contact method)

### **1. How did you find out about the consultation?**

By attendance at Stanford Parish Council meeting.

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

I will be directly affected by one of the sites and indirectly affected by the other proposed.

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

Daily

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

I am not normally directly affected by Operation Stack, unless travelling beyond Ashford.

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

Disagree.

Ways should be found to make vehicles wait off the highway.

### **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?**

Strongly Oppose.

I support the provision of additional lorry areas in general but not the provision of one large, single park which will adversely affect the quality of life of nearby residents, the setting of the AONB and the setting of designated and undesignated heritage assets. A single lorry park of the size proposed also seems likely to pose insurmountable issues of noise, light and air pollution and surface and foul drainage. Site 1 also implies a valuable natural resource (fishing lake and woods) will be destroyed or at least surrounded by artificial lighting, noise and fumes with consequent detriment to wildlife.

I am concerned that government, by concentrating on Operation Stack and providing an imperfect and supposedly expeditious fix for that, will not address the equally important issue of random lorry parking in the best way, which has already been agreed by all stakeholders. Both can be addressed better and cheaper with a different strategy.

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

Given that lorry parking is required, a lorry area of 300 or so spaces may well be designed to be environmentally acceptable in a number of locations in Kent. This is also the minimum size that has been reported as being financially viable but I note that many sites are smaller, albeit with basic facilities. Probably the maximum that could be designed to be acceptable in any rural areas, depending on location, is 500-1000. As noted in your Section 11, the larger the park, the fewer locations present themselves as suitable. On a brownfield site, such as at Aylesford Newsprint, more than 1000 spaces could be accommodated. The main criterion for

size should be environmental (including societal) impact.

The Operation Stack queue has exceeded 2764 vehicles (Phases 1 and 2, according to ESDG) only twice in 20 years. A 3600-vehicle park is a complete waste of money and valuable farmland.

**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.**

- 1 Minimises impact on residential amenity
- 2 Minimises visual/landscape impact
- 3 Providing overnight lorry parking
- 4 Reducing the attractiveness of local roads [for overnight etc parking]
- 5 Minimises other environmental impacts
- 6 Most effective in keeping the M20 open
- 7 Most effective in reducing delays to local roads
- 8 Maximises road safety
- 9 Least overall cost
- 10 Use of the facility has minimal impact on local roads
- 11 Providing an income to the taxpayer

I consider that multiple, smaller, lorry parks distributed along the main road arteries will provide a better solution than one huge one. Each park will perform better on criteria 1-5 above while performing equally well on criterion 6. Each park may well have an impact on local roads by making use of existing junctions, but in normal use that impact will be similar to that already caused by lorries seeking laybys and illegal areas to park. Closeness to the ports (Dover and ET) is important, but only for one of the parks.

Other criteria have been suggested by various commentators:

"It has to be on the coastbound carriageway" - why, when the apparently preferred option includes a bridge? In fact all sites north of the motorway potentially harm the view of the North Downs from the motorway and/or railway and Site 1 is the worst in that respect.  
"It must be accessed directly from the motorway, not via an existing junction." - only true for larger sites.

**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.**

This is difficult to answer as it depends on where the site is. If one large park is to be built within earshot of hundreds of people then it should not be used for TAP, overnight parking or a truckstop. The part of site 1 south of the motorway would need to be well screened to be at all acceptable.

For the alternative suggestion of a string of lorry parks providing between them thousands of spaces, as advocated by the EGSDG in July 2015, the primary use would be for overnight parking and rest areas. Some developers may find full truckstop facilities to be commercially viable – the market can decide. Dover TAP should be addressed by a single buffer zone as was suggested by Port of Dover in 2004/5 while developing their Master Plan (but dropped from the final report). The land should be provided and managed by Dover Port, although some financial assistance from government with capital costs may be appropriate in view of the ever-increasing measures to secure the country's borders which is adding to delays. No port should be designed or operated so that the public roads are congested three nights a week. This is not "general disruption". The taxpayer should not have to pay for the operation of TAP.

**10. If you have any comments regarding the effects that any of the alternatives 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.**

If Ashford Truckstop is allowed to expand (supported) and Stop24 is also extended, this will go a long way to absorb demand for commercial parking near the ports. There is also a demand in west/north-west Kent which must be addressed and could be without the impact on these two established truckstops that a new facility in Shepway would have.

**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?**

With multiple sites, each can decide for itself what to offer. One large site implies drivers will be on the site for hours if not days during a major event. It does not make sense to plan for food outlets, showers and other amenities to be built and then manned just for these events. Let the drivers park elsewhere where there are already such facilities, or they can be built, and they can be used daily.

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

Disagree

A single large lorry area may substitute for Operation Stack but it is still, basically, one long physical queue with all its attendant problems, lack of flexibility and cost to the national economy. In addition, it creates problems of its own. It is not a sustainable solution both in the sense of its effect on the environment and in the sense that as cross-channel traffic continues to grow, it cannot be scaled to deal with that growth.

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

I object to either Site 1 or Site 2 being developed for 3600 or more lorries. Development of Site 1 north of the M20 is totally unacceptable to me, and I would expect to be fully compensated for loss of value of my property if any of that goes ahead. The part of Site 1 south of the M20 would also be very visible from my house as it rises substantially above the motorway carriageway level. It is likely to increase the noise I experience daily from the motorway and have a detrimental effect on air quality. I would need to see what the environmental implications are and what mitigation measures are proposed for it before it could be considered anything like acceptable. I am also very concerned about the effect of that site on properties on Stone Street near the motorway and on the setting of Westenhanger Castle and its barn.

Of the two sites proposed in the consultation documents I would of course prefer Site 2 as it is further from my house. More objectively, I am not convinced that its impact on the AONB is any more than that of Site 1. You should by now be well aware of the mistake in your consultation document about the AONB boundary. Some of the arrangements I understand have been considered for the land north of the M20 come as close to the AONB as Site 2, and Kennett Lane is the boundary of a Special Landscape Area, not mentioned in your Environmental Effects Summary. Whilst Site 2 is more prominent from some viewpoints, a proper landscape appraisal would consider the number of locations from which a site is visible and the number of people likely to be at those locations. The case for Site 1 is not clear on that basis, for example, Site 2 cannot be seen at all from the busy road at Farthing Common. As for traffic impact of Site 2, the (occasional) impact on Junction 11 would be acceptable if this site were used only for Stack. It could possibly be acceptable for other uses, but you haven't provided any traffic modelling results or details of what improvements might be made to the junction, currently operating at less than capacity, I understand.

An extension to Stop24 makes sense, but the land to the south of the railway which was favoured by KCC but not SDC is to my mind the better option. Access from Junction 11 is easier to arrange, the site is less visually intrusive and easier to screen from nearby properties and it would not harm the setting of Westenhanger Castle. Drivers and site staff would have

less far to walk to the main Stop24 facilities building and there is ample scope for emergency accesses from the A20. It would also be down-wind of the majority of nearby properties.

My preferred site for a lorry park near to the ports which would, if you continue with your plans, provide the same opportunities as either of the Stanford sites is one between Junctions 11 and 11A on land which abuts the Channel Tunnel site. My neighbours in Stanford have had this investigated by road transport specialists Peter Brett and Associates (PBA) and I am fully in agreement with their conclusions as to access to this site. It has the major advantage of not requiring lorries queuing for Eurotunnel to re-enter the M20 (probably in platoons). When compared to Site 1, it offers the following advantages:

- direct discharge of traffic to the Eurotunnel site;
- less obtrusive when viewed from the North Downs scarp;
- cheaper than Site 1;
- would be easier to implement SUDS with discharge to two watercourses and a steeply sloping part;
- easier to arrange emergency access via A20 at several points;
- emergency procedures could rely on Eurotunnel systems for back-up; and above all
- the site would have less impact on surrounding properties.

Despite being inside the AONB I believe the overall impact on the countryside would be less than either of the proposed Stanford sites. It would appear as a continuation of the Eurotunnel site rather than an entirely new blot on the landscape. As designed by PBA, the part of the site which would be used the most is not visible from as much of the North Downs scarp as either site 1 or site 2. The part of the site which could be used less frequently (only in "Stack") is very visible from a short length of the Pilgrims' Way above Peene, but could be designed to be unobtrusive when not in use, for example it need not be lit, and could make use of Grasscrete or similar.

PBA have devised a layout which caters for both Eurotunnel and Dover traffic, but I think it would be better if Dover had its own buffer zone or zones, as mentioned above under question 9. Possible sites are at Court Wood, Lydden as suggested by PBA and Whitecliffs Business Park or Coxhill Road, the preferred sites in the 2013 AECOM overnight parking study. Also maximum use should be made of the Western Docks, rather than building a fruit terminal. I am less supportive of what PBA have to say about how the facility might be laid out and operated, but these issues are similar whichever site is chosen.

There are basically no suitable sites for a 3600-space lorry park anywhere near the main roads through Kent. However, if government is determined to develop a site of that size, I would like to know why the piece of land between the M20 and the railway between Westwell and Hothfield has been discounted. The extra distance from the ports doesn't matter as long as there are no holdups from other causes at J9 or 10. It is very similar to Stack in this respect when the head of the queue is at J9. Its impact on the AONB is similar to Site 1 but it would affect fewer properties. The topography at the west end of the site makes the necessary overbridge easier to realise and less intrusive into views from the Downs than at Site 1. It would not affect views towards the Downs from the motorway as Site 1 does spectacularly.

Once the constraint of 3600 spaces is no longer there, however, there are a lot more sites which could serve. You mention a number of smaller sites in section 11 of your document, investigated by KCC and others. My neighbours have identified about 30 sites, some with existing facilities which could be expanded and some in new locations. Mr Brewer (HE) mentioned "100-plus" sites in his evidence to the Transport Select Committee in October. Does this correspond to the long list in the 2013 AECOM study? It has not been possible for us to examine these in any great detail in the time available but even if a few of these were developed, the supply of places for rest and overnight parking could be greatly increased and, importantly, distributed throughout Kent. These would also be available for coastbound queuing as described in my paper attached to this response.

The opportunity to allocate land on the disused Aylesford Newsprint site for lorry parking

should not be missed. If this site is to be re-developed, conditions should include a substantial part of the site to be set aside for lorry parking. Access could be improved with a direct slip from the motorway if necessary.

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

The use of multiple lorry parks as a substitute for Operation Stack requires a robust virtual queueing system which in turn requires ferry operators and Eurotunnel to modify their booking systems. In the Report of the European Gateway Strategic Delivery Group (July 2015) many delivery systems are mentioned, including messaging, web sites, social media, "traffic technology" and "Intelligent Transport Systems to manage a virtual Operation Stack queue". The last is listed as "Medium term". I haven't been able to find anything published on what the system might look like. According to Natalie Chapman, the FTA is receptive to the virtual queue idea but has yet to see a proposal for how it would work. I think the requirements are very simple and could be implemented relatively quickly – certainly before a 50ha lorry park can be designed and constructed. I have prepared a short discussion paper on how I perceive the issues of cross-channel traffic management and elements of a solution. This is attached to this response. I have tried to cover as many of the questions you might have about my ideas as possible in that paper but would be happy to enlarge on any aspect.

We can do nothing about the weather, but it is possible to do something about disruptions by industrial action and incursions into the ports. All efforts to resolve these issues should be continued. In the event that they are ultimately successful, a 50ha empty area of tarmac would be a sad memorial to an ill-conceived plan. More, distributed, lorry parks would however still perform a useful function in keeping our roads free of haphazard lorry parking and detritus.

Finally, while I understand that a quick solution is desirable it would be sad, indeed, if expedience took precedence over quality for an undertaking of this size, cost and national importance. In particular, perceived problems of acquiring land in multiple ownership should not get in the way of choosing the best answers. Neither should the fact that environmental monitoring would have to be started for other sites, while you have been monitoring around Stanford for several months already, be taken as a reason not to find the best possible solution to two difficult lorry parking issues.