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Operation Stack – Transport Select Committee Inquiry

Evidence submitted by Stanford Parish Council on behalf of Communities affected directly by Highways England's proposals of December 2015

Introduction and Summary

1. This evidence is submitted by Stanford Parish Council (SPC) on behalf of its residents and surrounding communities. We understand that the Transport Select Committee (TSC) will not consider proposals for specific sites of any permanent lorry park as part of this enquiry. However, the work we have undertaken in preparing our response to Highways England's (HE) consultation on their proposal for a lorry park in our area has led us to non-site specific conclusions which are relevant to the scope of your inquiry.
2. SPC's position is that one large lorry park is not a solution to Operation Stack: at best it will replace a queue on the motorway with one in a field. Many of the existing problems with such a queue will remain, and the proposal will introduce new problems, especially for residents nearby wherever it is built.
3. The real solution to Operation Stack lies in resolving the man-made causes so that the ports remain open and provide resilience through additional cross channel capacity necessary to deal with predicted increases in road freight. If that is impossible resilience may also be improved by greater use of the M2/A2 corridor, encouraging use of other sea routes and alternative modes of transport for international freight. Although these are strategic measures and will take longer to deliver than a lorry park they represent a real investment in our national freight transport infrastructure and, therefore, a better use of British tax payers' money.
4. For the immediate future a network of small, lorry parks distributed throughout Kent and further afield, combined with improved communication to drivers of information relating to the ports status and traffic conditions offers a more sustainable and cheaper alternative to queues on the motorways than one lorry park, six times larger than any other in the UK.
5. The TSC's inquiry is specifically about Operation Stack, but we believe it is equally important to consider the associated issue of HGV parking in general. Indeed HE requested opinions as to whether a lorry park for Stack should also be used for "overnight parking" as part of their consultation.

Responses to the Committee's questions

The effect of a new lorry park on the planning, management and implementation of Operation Stack

6. HE propose to build a single new lorry park, but have not confirmed how it will operate. How can HE properly size, locate and design a major transportation facility without first establishing how it will operate? At present we must assume that the intention is that it will act as a direct substitute for the queue which currently constitutes Operation Stack. The danger with this approach is that, while it will ostensibly keep the M20 and A20 open (assuming current levels of freight traffic), all the other disadvantages of the Stack queue are likely to remain. These include:

- the need to mobilise a workforce of traffic managers and support staff at short notice;
- the necessity to mobilise welfare facilities at short notice;
- the need to physically divert port-bound traffic into the facility and sort it by channel crossing operator;
- the need to make provision for drivers to adhere to working time rules;
- the need to make special provision for urgent loads e.g. perishables;
- the difficulty of making proper provision for dangerous goods;
- the desirability of providing refrigerated loads with mains power while waiting;
- the desirability of allowing drivers to switch cross-channel operator, when circumstances change as the "Stack event" progresses; and
- by providing queuing spaces when alternative parking places are not available elsewhere in the highway network, drivers, having nowhere else to go, will be encouraged to join the queue compounding the problem rather than mitigating it.

7. A single lorry park also presents a very inefficient "solution" as it is both too big and too small. Too big because for most of the time it will be massively under-used or even completely empty if it is used only for Stack, while still blighting the countryside; too small because a repeat of 2015's events would overwhelm it, and the predicted growth in cross-channel traffic will make such events more frequent if nothing is done about the man-made causes of disruption. The replacement for Operation Stack needs to be scalable.

8. We believe that the best way to manage the flow of freight vehicles across the Channel is for each cross-channel operator to establish a virtual queue for each of their services. Drivers would be allotted a place in the queue and told by the cross-channel operators when to arrive at the port based on how the port is running (in this context, Eurotunnel is a port.) Drivers would then make their own decisions whether to wait or continue to the port based on traffic conditions between their current location and the port. Drivers could be updated continuously on the port and traffic status either via their companies' control rooms or direct from the port operators and highway authorities. Information would be presented succinctly on mobile devices and satellite navigation services. Freight drivers would then be in much the same situation as non-freight drivers ("tourists") who are allocated a particular sailing or shuttle time and can plan to delay their journey if notified of delays at the ports. The only difference is that, unlike a

tourist, a freight vehicle once at the port would take the first available crossing as happens now. However, the information put out by the ports and the highways authority would need to be more "fine-grained" (i.e. more timely and more detailed), than is currently published for either freight or tourists.

9. A virtual queue would not do away with the need for additional parking capacity close to the ports, however, the requirement would be significantly smaller as it only needs to be sufficient to enable ferries and shuttles to leave full during a stack event. No more than two hours' supply at the maximum throughput capacity of both ports should be necessary, including the queuing space provided by the ports outside their check-ins. Consequently the environmental impact and costs would be significantly reduced.

10. This virtual queuing system would dramatically reduce the need for additional management and facilities during an event which would have triggered Operation Stack. Drivers would require no more management than normally received from their employers.

11. In order for this system to work additional lorry parking capacity is required, but not all in one place. Indeed, it would be much better for them to be distributed throughout the highway network, which is already recognised by Government and especially by the relevant authorities in Kent.

The predicted benefits and disadvantages of changes to Operation Stack consequent on the building of a lorry park on the economy (locally and nationally) and local communities

12. SPC recognises the benefits of providing off highway lorry parking when capacity at the ports is constrained. However, there are better ways to deliver those benefits than building one large lorry queuing area. The communities of Stanford & Westenhanger, Sellindge, Stowting, Postling, Lympe and Monks Horton are all significantly impacted by Operation Stack given their proximity to Jct 11 of the M20 and the A20 and the degree to which residents rely on both these transport links. We also have firsthand experience of lorry parks following the establishment of Stop24's 300 lorry facility at Jct 11 of the M20 and have been dismayed by the erosion of environmental screening to allow its expansion. We are, therefore, well aware of the impact such a facility has and consequently feel qualified to respond to the Committee regarding the impact of changes to Operation Stack on local communities.

13. It is unclear why, after decades of studies and proposals for other lorry parks, a new freight facility, with apparently very little proper study, has suddenly been proposed in an area of great environmental sensitivity. The exact physical size has not been revealed but it would appear to be similar to facilities such as the London Gateway container terminal, for which extensive and lengthy environmental studies were performed. We are particularly concerned that the timetable for this project does not allow for environmental issues to be investigated in sufficient detail and that a proper comparative analysis of alternative sites, including the potential impact on the environment and nearby communities has not been performed. Our specific concerns relate to the following:

Visual intrusion: Wherever it is built to serve the M20 and/or M2 routes to the ports, a lorry park will impact adversely on the Kent countryside and particularly on the Kent Downs Area of Outstanding Natural Beauty. This represents a substantial loss of amenity for the public in general but especially for residents nearby who would also find their tourist-related businesses

affected. If operated as a physically managed queue, lane gantries will be needed and area lighting required, all of which would be impossible to screen. It is self-evident that a 50ha site poses more problems than smaller ones for which there are existing examples.

Air pollution: The concentration of up to 4000 trucks in one park is unprecedented in the UK (the largest existing lorry park has only 554 spaces). Even 1000 trucks, if queuing, running their engines, refrigeration engines and/or cab heaters would produce emissions which would exceed air quality limits to an unacceptable degree. Homes nearest the motorway are likely to be already close to some limits. Careful consideration should be given to the proximity of a lorry park of this size to local communities. 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 significantly increase emissions wherever it is located and the associated health and safety hazards would greatly increase the risk to any nearby communities. These pollutants cause most harm to the young and elderly. Given these risks we consider a lorry park on this scale 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.

Noise pollution: Stanford already suffers continuous motorway noise which is bearable even without the noise barriers from which other other villages along the M20 benefit. A lorry park on the scale proposed will introduce impulsive noises from brakes, reversing signals, horns, tyre squeal and the general noises of human activity and will impact any nearby community accordingly. Our experience of Stop24 suggests that smaller parks can be developed with a much smaller impact.

Crime: The concentration of potentially thousands of people in a relatively small area will make the site attractive to those hoping to do business (legal or otherwise) with lorry drivers. There are concerns about individuals' safety and security of their property given the transient nature of this large population, particularly given the limited police resources in the area. Also if the site is left empty for long periods, road-racers and others seeking a large, paved area for activities such as raves would be tempted to break in and cause nuisance.

Ecology: Designated and undesignated areas providing valuable habitats and amenity to the local community would be affected by a development of this size. In the case of the proposed Stanford West site one at least – a popular destination for walkers and fishermen - is likely to be obliterated.

Drainage: A paved area of the size proposed poses extreme technical challenges in dealing with surface water runoff. Preliminary calculations suggest a holding tank the size of 24 Olympic-sized swimming pools will be needed to comply with sustainable drainage criteria (SUDS). Calculations for such drainage systems depend on data which is subject to uncertainty and the potential for error leading to flooding seem high, as would be the cost of correcting mistakes. The current proposals have one site discharging upstream of Stanford, which has flooded historically, and either site is likely to result in the flooding of Westenhanger Castle (a scheduled ancient monument) and its associated listed buildings. Existing foul water drainage in any rural area is likely to be inadequate and treatment facilities for wastewater for a population of 4000

will be required. These would be grossly underused for most of the time, leading to minimum flow problems. Our concern is: where would a sewage treatment facility suitable for a small town be sited and if rarely used to capacity would it be properly maintained to avoid odour issues?

14. Should a number of smaller sites be developed, as we and other organisations have recommended, and was KCC's and the European Gateway Group's preferred option until late last year, environmental concerns would be much easier to manage for each site.

The extent to which current negative impacts will be mitigated by the creation of a lorry park

15. There are several categories of negative impacts associated with the bottleneck which is the Dover Strait crossing.

16. The largest impact, financially, is the cost to business of delays to international deliveries when the capacity of the sea or tunnel crossing is reduced. On the face of it, a large lorry park will do nothing to mitigate this loss. The best that can be achieved is to ensure that all ships and shuttles are full during a "Stack" event and especially in the period after full capacity has been restored but the queue is still being drawn down. It will be essential to maintain separate queues for each cross-channel operator and route. This is a long-standing problem at Dover. Improvements to segregate vehicles by operator were implemented in 2004 and the current Traffic Management Improvement Project offers the chance to queue vehicles by operator and route prior to admission to the inspection areas. This may be enough to solve the problem of one operator's traffic holding up another's. If not, this segregation will have to be done at any physical queue which exists outside the port, such as at the proposed lorry park. Our residents have witnessed Eurotunnel shuttles leaving "half empty" during Stack events. The cause may be internal to Eurotunnel and so unlikely to be solved by an external lorry park, although the recently opened additional queuing area and check-ins should help. More likely is that Eurotunnel has spare capacity but drivers are denied the opportunity to switch carrier from a Dover operator because they are held in a Dover queue. Any external queuing area should allow for such switches if freight companies have commercial arrangements with both Eurotunnel and a ferry operator. Without attention to these points in the design, there will be no benefits. The operators also need to set aside any commercial rivalries which may be contributing to these inefficiencies.

17. The next largest financial loss is probably that to Kent businesses and individuals held up by congestion caused by the closure of the motorway. A large lorry park will reduce this loss substantially, but so would other methods of keeping the motorways clear such as providing equivalent parking capacity in a number of smaller lorry parks.

18. The third major financial loss to Kent is the lack of investment in the county by business because of a perception that the roads are congested too often. A large lorry park could mitigate this but it would stand as a symbol that the underlying problem has not been solved. Businesses looking to invest for 10 or 20 years could still worry that problems will return as traffic continues to grow. Again, other smarter "solutions" rather than one big lorry park would perform as well if not better.

19. There is a corresponding cost to the UK economy if businesses are not establishing in UK because of a fear of not being able to deliver to the Continent in a timely manner. A large lorry park will do nothing to mitigate that fear.

20. The cost of managing Operation Stack, involving input from Kent police and sometimes other forces, HE and port operators is substantial. A physical queue removed from the motorway to a single lorry park would require a similar managerial effort. Probably the only savings might be the reduced need for warranted officers. Against this, if proper provision is made for drivers' rest breaks, special loads, "reefers" etc. as set out above, more staff might be needed than for the current Operation Stack. Management could well be subcontracted to a private enterprise. Overall, management costs will probably rise.

21. Maintenance costs for the lorry park will be substantial and more than the current additional costs during Stack events. Some costs will relate to the size of the facility rather than the number of users and so will be disproportionate to the benefits.

22. There is a direct environmental impact of Operation Stack, largely to do with emissions from start-stop driving and littering. A single, large lorry park could be designed so as to reduce the amount of starting and stopping but would concentrate the emissions in one place rather than distributing them over 13 or more miles of motorway. It is not clear whether there would be a net benefit for the worst affected communities, but a number of smaller parks, intelligently sited, would surely be better than a queue either on the motorway or at a single site.

23. One suggestion by HE is that the proposed lorry park could be used for "overnight parking", thus reducing the number of vehicles parked in inappropriate and often illegal places around the countryside. There would indeed be a benefit, but only for the vehicles that wish to park in that part of Kent and are willing to pay the parking fees. For others, seeking to maximise their driving time within working time rules, a number of parking facilities along the main routes with a range of facilities and prices would deliver much greater benefits more widely.

The short-term solutions needed to improve Operation Stack while construction of a lorry park is underway

24. For Sellindge residents, and the many others who shop in Sellindge, the use of the motorway between junctions 10 and 11 for Stack has been a disaster with slow moving or stationary traffic a regular occurrence on the A20 running through the village. There were similar problems in Ashford. We have not seen any evidence that the revised Operation Stack phasing introduced last year has delivered a better result overall than the previous scheme and we suggest a reversion to the previous phases (J8-9 and J11-12).

25. The key to reducing congestion off the motorway is the quality of information put out by the authorities about traffic. It is not enough to know Stack is on. Knowledge of the length of the queue at junction 8 and the speed at which it is moving would allow non-Stack traffic to take avoiding action. This information needs to be collected and communicated rapidly to broadcasters and suppliers of traffic data to satellite navigation services. This did not seem to be happening last summer.

26. Proposals for lorry parks by the private sector as opposed to those proposed by HE and requiring public funding should be expedited. Some of these have ironically been put on hold

pending a decision on HE's proposals. Smaller parks and extensions to existing parks would be delivered more rapidly than developing one large park with an additional grade-separated junction. These would address the "overnight parking" issue and provide capacity for vehicles to break their journey on the way to the ports rather than queue on the M20. Best of all, private funds are known to be available for some sites so even if some of the £250m is needed, parking spaces could be provided with much less burden on the taxpayer.

27. As noted above, we believe a virtual queuing system is technically feasible and could form the basis of a solution to queuing on the motorway which performs better than one large lorry park. It is also scalable to adapt to future increases in Dover Straight traffic should more sustainable modes and routes for international freight not be developed fast enough. It would immediately allow greater use of the M2/A2 route and not continue to force traffic down the M20. The system could be piloted very quickly and then gradually improved with better information about flows through the ports and on the highway network and availability of spaces at lorry parks. Drivers and freight companies should be involved in designing the system so that it becomes useful to them and therefore encourages compliance with arrival times at the ports. It would deliver benefits quicker, with less environmental impact and for less money than a large lorry park can be constructed.

The other actions that central and local government need to take, including those on road maintenance and improvement, upstream and downstream from the proposed lorry park

28. If the technology (sensors) necessary to closely monitor traffic conditions the length of the M20 and A20 in Stack conditions is not yet there, that should be installed as a priority. Also, an examination of the publicly available data from HE's HATRIS system for January 2015 suggests the journey times algorithm may need to adapt better to very slow moving queues.

29. The M2/A2 corridor was the designated route to Dover before the tunnel was built. For a long time, the perceived lack of capacity on the A2 west of Rochester was cited as a reason not to sign Dover traffic along that route. That part has now been upgraded. Government should now bring forward the necessary improvements to the A2 near Dover which are said to be the other main issue preventing signing that route for Dover Port traffic. That route should then become the recommended one for all Dover freight, even before any new Thames crossing is built. The same monitoring technology as we suggest on the M20 corridor should be installed and lorry parks developed along that route.

30. The M2/A2 route has to be improved sooner or later and will be the natural choice should a Lower Thames Crossing be built east of Dartford. Since the majority of cross-channel capacity issues affect Dover, rather than Eurotunnel, it would be short-sighted indeed if the "solution" to Operation Stack was built on the M20 alone.