

## **RESPONSE TO HIGHWAYS ENGLAND CONSULTATION**

### **M20 LORRY AREA**

This is a response by R J Morris of Stanford

#### **Introduction**

Operation Stack has been a fact of life for residents of Kent since 1988. As a solution to Traffic congestion when cross channel travel has been interrupted it has been an imperfect solution but over the five years preceding summer 2015 it was called into play on just 6 days. A “perfect storm” in June 2015 resulted in its implementation for sufficient time to encourage politicians to seek a permanent alternative solution.

Until June 2015 previous proposals for large lorry parks had been consistently rejected by Kent County Council, local MP and Shepway District Council. Kent County Council’s report on the Channel corridor recommended multiple smaller lorry parks but reported that Government would not fund the construction of such lorry parks.

As a reaction to the major disruption in summer 2015 Government funds were suddenly made available to fund a single huge lorry park as a solution to Operation Stack.

It remains unclear who decided that a single Lorry park was the solution. Highways England say they were instructed by COBRA to produce a plan for a viable site for a single Lorry Park yet COBRA meeting reports suggest Highways England and Kent County Council were to bring to them a preferred solution for consideration by COBRA. It remains surprising that no-one claims the credit for proposing this solution.

We submit, alongside many others, that the “Single Lorry Park Solution” is no solution at all and is a misconceived waste of public funds.

The Transport Select Committee recorded the reported arguments in favour of the single Lorry Park proposed to the west of Junction 11. These were:-

1. Keeping the M20 Open
2. Driver Welfare
3. Maintaining Freight Fluidity
4. Government Funding Commitment

The combined effect of these matters was promised to result in a financial benefit to local business and to European freight businesses.

It is against those reputed benefits that the fitness of the Lorry Park for its purpose must be judged. If it is considered not to deliver the benefits promised then it fails to fulfil its purpose and will be a waste of public funds.

#### **1. Do you have any comments on the indicative layout of the lorry area?**

### M20 Bridge between sites

1.1.1 The construction of a bridge over the M20 will cause extensive disruption to M20 traffic during the construction of the Lorry Park. We can expect at least six months of lane closures, speed restrictions and over night carriageway closures. That will be a level of disruption cumulatively far greater than Operation Stack has been for many years.

1.1.2 Such an impact detracts heavily from any benefit considered gained by the construction of the Lorry Park in the longer term and does not meet the aim of keeping the M20 open nor of maintaining freight fluidity while the Lorry Park is under construction. It is unacceptable and disproportionate to cause greater disruption and delay on a daily basis for a long period when Operation Stack itself is expected to impact only perhaps five days a year.

### Fire safety and emergency access

1.2.1 Huge numbers of lorries will be packed in tightly within the Lorry Park on each site. The risk of spread of fire should any lorry catch light for any reason is enormous.

1.2.2 We can see no substantial fire breaks in the parking of lorries to inhibit the spread of fire, either within the site between lorries or between the Lorry park and neighbouring property. Domestic dwellings abut the north site to the east and round to north while prevailing wind is from the south west creating a high risk of spread of fire in that direction.

1.2.3 There is no declared means of raising the alarm or fighting fires until Emergency Services arrive. There is no separate means of access for Emergency Services when they do attend and it is notable that access to the south site will include approaching against the prevailing wind. We can see no preserved areas within the site to which lorries could be moved to escape the fire.

1.2.4 The layout of the Lorry Park is less beneficial than queuing on the Motorway as it has been under Operation Stack. A lane was left clear each side of the queues on the M20 to enable access of emergency vehicles to each and every lorry individually and it remained possible to pull any lorries near an incident out of the queue so they could move to a safe location and enable all round access to the incident.

1.2.5 There is no report from Kent Fire Brigade confirming their approval of the design of the Lorry Park and their ability to effectively address any emergencies which may arise within it.

1.2.6 The risk of loss of life as well as property is significant and Highways England will breach the Human Rights of citizens if adequate provision to protect life is not made.

### Junction 11

1.3.1 Despite efforts to place the exit slip road as far to the West as possible it is simply not possible to position it far enough from the junction 11 coast bound exit slip road to comply with required weaving length between junctions.

1.3.2 The site chosen is simply the wrong location and an effective Lorry Park cannot be constructed at this location. The site was previously considered by KCC for a Lorry park and rejected for exactly that reason (among others).

1.3.3 It is unacceptable for Highways England to ignore regulations on such matters and entirely inappropriate to try to manipulate other Motorway regulations to present an appearance of legality to conceal a breach of safety regulations. Again Highways England will be liable for breaches of Human Rights of any citizens killed or injured as a result of a failure to ensure their safety in accordance with the Government's own regulations.

#### Pedestrian crossing at South Stanford

1.4.1 The south site is accessed by a road running alongside Stop 24 between the existing Lorry Park and the Motorway itself. This is intended to be the sole access to that site when used for overnight parking.

1.4.2 This access road crosses Stone Street near to the Farmers' Bridge over the M20 which provides pedestrian access from the North side of the Motorway (Stanford) to Westenhanger and the Railway Station. It is essential that commuters, schoolchildren and others have a safe right of pedestrian access across that access road.

1.4.3 Highways England will be liable for a breach of Human Rights of any person at risk of harm if it fails to take adequate precautions to ensure that pedestrians are safe at all times from Lorry park traffic.

1.4.4 As parents of teenage daughters living in Stanford and using the Station for getting to school we and other parents are also clear that it is essential that pedestrian access for the existing right of way be separated entirely from any pedestrian access by lorry drivers who may for example wish to walk between Stop 24 and the new south site.

1.4.5 Again Highways England have obligations to preserve and protect Human Rights which it must fulfil. We would also remind Highways England that any footpaths, bridge, etc will require adequate provision to enable Disabled access.

#### Driver facilities

1.5 There are none on the North site. This fails to address the promised benefit of improved welfare of drivers.

## **2. Do you have any comments on the environmental impact of the proposals?**

2.1.1 Environmental impact of the site has been much understated by HE in the consultation and in our view in the Environmental Assessment Report.

2.2.1 Wildlife assessments are necessarily flawed by virtue of the lack of time available to have completed a proper investigation. A full annual cycle has not yet been observed so any conclusions drawn to date must be speculative.

2.2.2 It is unacceptable and misleading in assessing the impact of the Lorry Park to “average” its annual impact by asserting that it will only be used a few days a year. A worst case scenario has to be calculated to be clear of the true potential impact of the construction and use of it.

2.2.3 Damage to the Environment by noise, vibration and pollution is not automatically undone by ceasing the activity several days later. Pollutants in the water and countryside cause permanent damage to wildlife and habitat while noise and vibration will drive away wildlife native to the area.

2.3.1 We have read the response to the consultation submitted by CPRE and share their concerns regarding hydrogeology and flood risk.

2.4.1 Proposals to construct acoustic barriers to reduce noise pollution to the local community are reduced in effectiveness where the land surrounding the Lorry Park is at a higher level. Noise will be easier carried by prevailing winds which pass over the Lorry Park in the direction of the village of Stanford.

2.4.2 Noises above the general engine noise will travel further and more antisocially especially at night. Use of horns for example will be particularly disturbing and yet can reasonably be expected. We do not believe that effective provision can or will be made against this.

2.5.1 Assessment of air pollution has not been fully examined. Air quality has been tested in the current conditions of the area only. Modelling and desk study cited in the EAR does not include any sampling of air quality in any active Lorry Park. This has been admitted by HE’s air pollution expert at a meeting with us.

2.5.2 Such sampling as has been done reveals that the quantity of air pollution doubles from the country lanes of Stanford to the crossing of the A20 over the M20 at Shrine Farm - a location where a good flow of traffic on both roads will dissipate fumes and particulates far quicker than the slow moving or stationary lorries in the Lorry Park. Any report based on no actual sampling of air quality in a working lorry park must inevitably be flawed and unreliable.

2.5.3 Again the assessment averages out air pollution over the year. This is a misleading approach and unacceptable. The exposure to unacceptable levels of air pollution for even a short time is deleterious to health and must be prevented. Failure to do so will amount to an actionable breach of the Human Rights of citizens affected now and in the future.

2.5.4 Lack of facilities for drivers at the north site will encourage disposal of human waste and other detritus into the environmental mitigation placed on and around the site.

2.6.1 A full Environmental Impact Assessment should have been carried out in accordance with the Highways Act and I was assured by both my MP and the Secretary of State for Transport that Highways England would comply with law in progressing the proposal to build this Lorry Park.

### **3. Do you have any comments on additional measures we could take to further mitigate the environmental impact of the proposals?**

3.1.1 There is no mitigation measure which we believe will provide a better environment than exists before the construction and use of the Lorry Park. HE accepted this fact in meetings, and that there is nothing that can be considered beneficial to the local community or environment in the construction and use of the Lorry Park.

### **4. Regarding the management of the site, do you have any comments on:**

#### **a. Traffic Management**

##### In-bound flow rate

4.1.1 In parking Lorries so tightly together in a single location it is necessary for checks to be made on contents, etc. It is also necessary to queue the lorries for two separate destinations and to catalogue what goes where. The process of collecting this information on arrival at the Lorry Park will slow the entry of lorries onto the park.

4.1.2 HE stated in the December 2015 consultation documents that 5,400 lorries travel each way each day on the M20 bound for one of the channel crossings but that this would double over the next decade. Assuming a steady growth we can add 10% to that figure already, so 5,940 lorries can be expected over a 24 hour period. On average that will be 247.5 lorries per hour which will need to be admitted to the Lorry Park at the rate of over 4 per minute. Even with 8 booths there can be no longer than 30 seconds between each lorry pulling up at the booth to start being processed. At peak times of course that rate will have to be much quicker.

4.1.3 Any failure to meet these targets and any delay in opening the Lorry Park once Operation Stack is called on will result in traffic queuing back along lane 1 of the M20.

4.1.4 The rate of in-bound flow will also have to be maintained throughout both the filling and emptying of the Lorry Park if queue jumping is to be prevented once the traffic in Operation Stack is called forward at the end of Operation Stack.

4.1.5 It appears inevitable that HE will fail to maintain an acceptable in-bound flow rate as their own best case estimations of the time required will be 40 seconds per lorry.

##### M20 Queueing

4.2.1 Any delays in processing entry into the Lorry Park at the outset of Operation Stack or during its use will result in queues on the M20.

4.2.2 The arrival of 4 lorries in the queue each minute on average will extend the queue by a mile every 24 minutes. It is just 5 miles from the entry of the Lorry Park backwards to Junction 10.

4.2.3 It is worth noting that it is likely that traffic will be stationary when Operation Stack is called on and there will be further delay while waiting for the Lorry Park to be opened up, for staff to arrive to man the booths etc (bearing in mind how they are going to get there at all).

4.2.4 Human nature dictates that unless policed at Junction 10, or even before, many lorry drivers will use lane 2 until the last possible moment and will then block traffic in lane 2 while they try to force their way into the near stationary queue in lane 1. This will obstruct all other traffic in lane 2 and those taking evasive action from lane 2 will also obstruct lane 3. This will cause a concertina effect for all other traffic and result in queues back beyond junction 10 very quickly.

4.2.5 The reality of this is that the M20 will be effectively blocked from Junction 10 coast bound in very little time and traffic will divert onto the A20 via Sellindge. This is unacceptable and a failure to deliver one of the main benefits argued in favour of the Lorry Park solution, namely Keeping the M20 Open.

#### Phase 2 of Operation Stack

4.3.1 Upon the same basis as above a Lorry Park with capacity for 3,600 lorries will fill in just over 14 hours if no traffic is moving out of it (or even faster if in a peak period). HE have made clear that once the Lorry Park is full Operation Stack traffic will then queue on the M20 between junctions 8 and 9.

4.3.2 Lorries to be queued between junctions 8 and 9 will need to be intercepted at junction 8 in good time before the Lorry Park is full otherwise there will be further queues from the Lorry Park to junction 9 containing stranded traffic trapped between the two phases.

4.3.3 At a rough estimation interception at junction 8 would have to be implemented no later than about 10 to 12 hours into Operation Stack.

4.3.4 All other traffic heading coast bound will be taken off the M20 at Junction 8 and diverted along the M20 through Harrietsham. This is unacceptable and a failure to deliver one of the main benefits argued in favour of the Lorry Park solution, namely Keeping the M20 Open.

#### Exit flow rate

4.4.1 Traffic exiting the Lorry Park will be released onto effectively one lane of the M20. Again there will be necessary delay in checking that lorries seeking to leave are doing so in correct order.

4.4.2 They will then join the exit slip road in single file within a restricted speed limit of 40 mph and we were assured by HE at meetings that there will be a gap between each one of sufficient distance that traffic already on the motorway will be able to filter into the gap.

4.4.3 A reasonable estimate is that one lorry could rejoin the M20 every 5 seconds and this would provide a release rate of 720 per hour. Peak flow rates of traffic now are up to 1000 per hour and Port of Dover and Eurotunnel have capacity it seems to cope with such numbers.

4.4.4 Releasing from the Lorry Park at 72% of that peak capacity will slow the recovery after Operation Stack. That does not ensure the most efficient management of freight fluidity and fails to achieve the benefit argued in favour of the Lorry Park solution, namely Maintaining Freight Fluidity.

#### Local traffic

4.5.1 The closure of Junction 11 exit coast bound while Operation Stack is in use will disrupt traffic heading for local villages and towns including Lymyne, Hythe and Dymchurch.

4.5.2 Drivers will be forced to choose between staying on the M20 to pass whatever disruption is caused by the queue into the Lorry Park and then still take a ten mile detour to come back to Junction 11 from the east. More likely they will opt to leave the M20 at Junction 10 and use the A20 through Sellindge.

4.5.3 When phase 2 of Operation Stack has to be instigated then the M20 will be closed coast bound at Junction 8 and all other traffic will have to use the A20 through Harrietsham.

4.5.4 It was stated to be a benefit in favour of the Lorry Park solution that local roads would cease to be disrupted because the M20 would be kept open. It is clear that Highways England will fail to ensure that this promise is met. This is unacceptable and another failure to deliver the stated benefit of Keeping the M20 Open.

4.5.5 It is also outrageous that the need for closure of Junction 11 coast bound slip road is due entirely to the site of the Lorry Park. It must have been known to Highways England from the outset that no exit from the Lorry Park proposed could ever maintain sufficient weaving length before Junction 11 to allow the use of both slip roads. To fail to disclose this to all concerned at the first opportunity is seriously misleading and unacceptable.

4.5.6 We do not believe that the closure of the Junction 11 coast bound exit can be acceptable even as a “temporary” measure while variable speed apparatus is installed. That this will take years to complete after the rest of the Lorry park is open is unacceptable as is the principle that an exit lane could be built at all by a government agency in breach of its own regulations.

4.5.7 We were assured by our MP and the Secretary of State for Transport that the Lorry Park would have to be built in accordance with law.

#### **b. Security**

4.6.1 Numerous problems are created by the construction of the Lorry Park and others by its use.

4.7.1 While the Lorry Park is in use there are proper concerns that the community have for the risk of offences committed by drivers. This will be a large, diverse and yet predominantly male transient population suddenly being forced together in a

single area. Many drivers, in fear of attack across Europe, carry weapons in their cabs. This is more acute at present in light of events at Calais and approaches to Calais but is not confined to this topical issue only.

4.7.2 Lack of facilities for drivers at the Lorry park during Operation Stack will lead drivers to seek refreshment and diversion outside the Lorry Park. That will be an invitation to illicit traders and others to attend the Lorry Park seeking to earn cash from the captive consumers therein and others including organised gangs of thieves who will seek to get into the Lorry Park and acquire goods. This is likely to involve such persons accessing the lorry park from the villages abutting it and establishing meeting or entry points along the perimeter. We hold no faith in security fencing excluding such determined individuals and groups for long.

4.7.3 Such illicit trade carries with it violence and disregard for safety of those who may be going about their lawful business of living nearby.

4.7.4 Identifying and bringing to justice any who commit offences will be very difficult whether their offences be inside or outside of the Lorry Park. Security CCTV may be considered a deterrent but in reality it is not. Identification is key and not only will quality of CCTV have to be extremely high for facial identification but also we would need a huge data base of images to match any offender against bearing in mind they could be from such a large range of countries whether they are drivers or from outside the Lorry park. Because identification is difficult inhibition of offending is reduced, especially if potential profits are high.

4.8.1 Safety of villagers and their children has to be preserved. There is a duty to observe and preserve our Human Rights and ensure our safety and ability to enjoy a normal life in our own homes and villages. We should not be left to feel that we are prisoners in our own homes when Operation Stack is in progress. Such would be unacceptable and would be actionable if Highways England do not ensure our Human Rights are preserved and safeguarded.

4.8.2 It is also discriminatory that the greatest at risk or reasonably in fear of risk will be women and children.

4.9.1 A different set of challenges arise when the Lorry Park is not in use. A 250 acre concrete slab will be attractive to travellers for temporary occupation and to others for activities such as racing or “stunt” driving both for cars and motorbikes. If accessible it is also a convenient meeting place for other criminal activity such as drug dealing, prostitution, etc.

4.9.2 We have been assured that the design includes insurmountable kerbs on the exit and entry from the Motorway and indestructible barriers in the road entrances and exits. However, it will not be easy to deter all who consider that using such an area would be fair game and we are yet to be told anything that will convince us that all such illegal use can be prevented.

4.10.1 We have yet to see any documentation confirming the attitude of the Chief Constable of Kent regarding how the Lorry Park can be policed effectively within the Kent Police budget either when it is in use or when it is standing empty.

### **c. Operation of Overnight Parking**

4.11.1 The need for overnight parking is said to be justified by complaints of fly-parking, but HE appear unwilling to accept that the major causes of lorries fly-parking are the cost of using a Lorry Park's facilities and the restrictions on drivers' hours.

4.12.1 HE intend to charge for overnight parking and to pitch the cost just below that of their nearest competitor. It is not a proper use of Government funds to establish a business operation that will be run to undercut private enterprise.

4.12.2 It is of no help to many areas in their battle against fly-parking of HGVs that there is a huge facility available too far away for drivers to be able to legally continue their journey to park there.

4.12.3 Highways England seem to fundamentally lack understanding of the issues relating to this problem. The concept of a single large lorry park in Kent does not address the need for parking facilities at reasonable or even minimal cost across the country and seems to ignore the needs of drivers to comply with EU driving hours directives.

4.13.1 HE also fail to understand why the existing lorry parks in Kent close to junction 11 fill up. It is not all because drivers are unable to take breaks in France in the last 200 km of their journey to the UK. Many arrive in Kent from elsewhere in the UK and overnight ready to leave the UK when their rest period ends. This is particularly the case on Sundays as France does not permit HGV traffic on the roads yet in the UK we have no such restriction.

4.13.2 This is important as coast bound lorries heading for an overnight stay at the new south site will leave the M20 at Junction 11. Left hand drive HGVs at the roundabout of this junction have an insufficient sight line to their right and cannot see other traffic approaching in the nearside lane. To encourage many more lorries to use that junction to turn into the new lorry park increases the risk.

4.13.3 To date HE have not even considered conducting any risk assessment in relation to that junction. They have a duty nonetheless to ensure the safety of all other road users and an actionable breach of Human Rights will occur if adequate safeguards are not put in place.

### **d. Management in general?**

4.14.1 No real proposals for the overall Management of the Lorry Park seem to have been advanced. It does not appear that HE have any particular plan in mind nor are they prepared to offer any guide based upon experience. Lack of a plan will inevitably lead to compromise and failure. Failure to properly manage, maintain and secure the site throughout will result in detriment to the community and destruction of environmental mitigation measures. This is unacceptable.

## **5. Do you have any comments on the facilities that should be provided at the site?**

5.1.1 Driver welfare was expected to significantly improve as a benefit of a huge single lorry park.

5.1.2 It is astonishing therefore that the proposals contain no provision for permanent facilities such as toilets, shower facilities, provision of refreshments or other essentials for drivers caught in Operation Stack.

5.1.3 We are specifically told that the only concession to providing any facilities at all on site for drivers would be the provision of Portaloos. This is no improvement of the facilities available should drivers be stranded in a queue on the Motorway itself as they would have been under Operation Stack.

5.1.4 Furthermore Portaloos would not be left on site but would have to be brought onto site only once Operation Stack is called into place. Highways England fail to acknowledge the logistical issues in getting such facilities to the site on time or even at all and the fact that there might be some disruption to normal flow of traffic in the area at such times seemed to come as a surprise to the representatives we met who conceded in meeting with us that they would have to “hope” that when Operation Stack was required companies who would supply the Portaloos would be able to supply sufficient resources and deliver them virtually instantly.

5.1.5 That HE do not intend to provide any or any adequate facilities to improve the lot of lorry drivers despite representing this to be a major benefit of establishing a permanent Lorry Park is completely unacceptable.

5.2.1 The fundamental failure to improve Driver Welfare indicates a further misrepresentation made at an early stage of the process and shows that the Lorry Park offered now is simply not fit for the purpose for which it was commissioned.

5.2.2 The lack of proper provision for drivers will increase the environmental impact of the use of the Lorry Park and will increase security concerns as drivers will not have what they need on site. Disposal of bodily waste and other detritus by drivers into the Environmental Mitigation Measures inside the Lorry Park or over the fence into the wider community is to be expected and will be aggravated by any late arrival of such limited facilities as HE condescend to supply.

## **6. Do you have any comments on how the operation of the site should be kept under review?**

6.1.1 We are aware that there is pressure from some sources to make greater use of the Lorry Park once it is built. That has to be considered in light of the assurances already given limiting the frequency of use of the Lorry Park to mitigate the Environmental and other impacts and the very real practical issue that the Lorry Park would have to be instantly available to be used within Operation Stack at a moment's notice.

6.1.2 Stop 24 is already vastly underused by private travellers and in the years it has been there many businesses have had to give up because of the lack of footfall. There is no logical argument then to expand as a service area for all traffic.

6.1.3 To use the site for any purpose 24/7 would require construction of facilities which would limit the Parking space available for Lorries when it is in use for its primary purpose thus defeating the object of building it at all.

6.2.1 Any proposal to vary the use of the Lorry Park once built should require the full support of the local community. However we have no faith in HE, KCC, SDC or our MP truly taking account of the views of the local community else the Lorry Park would not be built at all.

## **7. Do you have any comments on our equality and diversity proposals?**

7.1.1 Sexual and Child Discrimination needs to be considered in relation to the risk of harm to residents from criminal acts.

7.1.2 Disability Discrimination may arise if there is insufficient accessibility of footpaths, crossings etc.

## **8. Do you have any other comments?**

8.1.1 This entire project appears to be underpinned by misrepresentation and misleading claims, while the process of “consultation” and “engagement” with the local community by Highways England and by Government has been a mockery from start to finish.

8.2.1 As residents of Stanford living within a few hundred metres of the planned extent of the Lorry Park we received no written notice of the first Consultation at all. We were left to discover by rumour and our own investigation that we were to be confronted with a choice of whether we wanted a Huge Lorry Park to the West or a Huge Lorry Park to the East of our village.

8.2.2 Assurances that we could always vote that there be no Lorry Park at all have proved to be hollow promises and more recent discussion with Highways England reveals that HE never considered that not building the Lorry Park at this location was ever truly an option.

8.2.3 That HE claim “support” for the “Stanford West” proposal by a result in which less than a third of respondents “preferred” the site is a scandalous misrepresentation of local and public opinion.

8.3.1 The Transport Select Committee met and made scathing observations regarding the process and the hastiness of decisions to proceed with this project. No genuine heed has been taken of those concerns.

8.3.2 Indeed since the approval of the Secretary of State for Transport was secured by Highways England the detailed proposals revealed that Highways England had misled in the first consultation and had misled the Transport Select Committee regarding the

size of the Lorry Park, revealing its true extent to be 66% larger than disclosed.

8.3.3 One is left to assume that the Secretary of State was also misled, unless he too was aware of the misstatement and took no steps to correct it.

8.3.4 It has become apparent on the second consultation that the coast bound exit of the M20 at Junction 11 would be closed removing the benefit to local community of the assurances that HE would be Keeping the M20 Open.

8.3.5 It is clear that many involved in the first consultation process and before have been misled by the significant omission of this important detail.

8.4.1 The public meetings under the second consultation have been poorly publicised by Highways England and, at their locations, badly signed. There were few if any external signs advertising the presence of Highways England and their desire to receive the views of the public or answer their questions. At least one meeting was publicised with incorrect postcode for the venue, several miles away from the actual location where the meeting was taking place.

8.4.2 Locals consistently emerged from such meetings, angry, upset, and feeling they had no voice. The phrase “done deal” was frequently to be heard and staff were frequently described as patronising or condescending.

8.4.3 Astonishingly no meeting at all was offered in Stanford or Westenhanger. Excuses offered for this were risible. Representatives of HE rejected the suggestion that Stanford Church could be used on the basis of risk of causing religious offence to other faiths, but that did not stop the use of a Church for a meeting at Willesborough.

8.4.4 Overall the impression fed back to me has been that Highways England had no genuine commitment to learning the views of the public and no real empathy or consideration for the devastating effect this Lorry Park would have on the lives of the people living and working nearby.

8.5.1 The brief from COBRA to Highways England was to secure a permanent solution to Operation Stack. The first consultation published by Highways England in December 2015 confirmed that the government had “set funds aside to build a permanent area where lorries can wait their turn to cross the Channel and do not cause disruption to local people or the economy”.

8.5.2 Section 7 of the Consultation document is titled “The case for a permanent off-road **SOLUTION**.”

8.5.3 That section also asserts that the construction of an off-road lorry area is to be an **ALTERNATIVE** to continuing to rely on Operation Stack.

8.5.4 The Secretary of State for Transport in authorising the construction of the Lorry Park at Stanford West declared “The primary focus of the Lorry Park is to provide a **SOLUTION** to Operation Stack in its current form.”

8.5.5 Highways England have now resiled from that commitment and claim that they

only ever expected the Lorry Park to **ALLEVIATE** some of the worst effects of Operation Stack. In other words Highways England accept that the Lorry Park is no solution.

8.5.6 Had that opinion been made clear at the outset (according with all previous thought on the subject) it should have been an inevitable consequence that an alternative genuine solution could have been considered. Instead a huge amount of time and money has been wasted pursuing a solution that is no solution.

8.6.1 The benefits asserted in a Single Lorry Park Solution are not going to be achieved.

8.6.2 **Keeping the M20 Open** will not happen due to the combination of closure of Junction 11 coast bound exit, queuing on M20 from junction10 due to insufficient in-bound flow rate to the Lorry Park and before long traffic jams at Junction 10 and closure at Junction 8 to facilitate phase 2 of Operation Stack. Highways England will **FAIL to Keep the M20 Open**.

8.6.3 **Driver Welfare** is not addressed at all. No better facilities are offered at the Lorry Park than were available parked on the M20. In fact fire safety is much reduced in the Lorry Park and drivers positively put at risk by confinement into a limited and overcrowded area. Overall Driver Welfare is **REDUCED** by use of the Lorry Park.

8.6.4 **Maintaining Freight Fluidity** requires swift release of freight traffic as early as possible. Exit flow rate will not be better than 72% of the rate that the Port of Dover and Eurotunnel can handle and there is reduced efficiency directly from the use of the Lorry Park. Release of traffic from the Lorry Park is not as simple as it has been under Operation Stack where simply the first in line is released and everyone else follows immediately. That simply cannot be done in releasing from the Lorry Park as traffic is not stored in a single line. Freight Fluidity is actually **REDUCED** by use of a Lorry Park.

8.6.5 **Government Funding Commitment** is perhaps the only real benefit supporting the scheme. If someone will pay for it then it can be built. The solutions of multiple Lorry parks staged at reasonable intervals is rejected because the Government will not fund it. The Government will fund the Single Lorry Park Solution because HE say it is the best solution, but now it is known that HE say it is not a solution the basis for Government funding must fall away and this benefit of the scheme ceases to exist.

8.7.1 The argument that the creation of a Huge Lorry Park will save UK business millions of pounds a day is not sustainable.

8.7.2 The value of non-perishable goods in transit does not disappear solely because those goods are delivered late, though storing them all in a single location increase the risk of targeted theft from lorries.

8.7.3 Perishable goods will be lost by delay, but that delay will exist wherever the Lorry is parked while it cannot cross the Channel to deliver its load.

8.7.4 Impact on local business by congestion of the Motorway and local roads is what required the benefit of Keeping the M20 Open, but HE are failing to achieve that in their plans for the Lorry Park.

8.8.1 There is **NO REAL DISCERNIBLE BENEFIT** in the construction of a Huge Lorry Park at this location nor at any other. Highways England are unable to design a Lorry Park that will achieve the benefits they claim and the Lorry Park, if built will be a **CATASTROPHE IN THE ENVIRONMENT** and a **CATASTROPHIC WASTE OF PUBLIC FUNDS** both in construction and forever after.

**R J MORRIS**

**21<sup>st</sup> September 2016**