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**Managing freight vehicles through Kent, Response to Second Consultation
September 2016**

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

SPC remain fundamentally opposed to the proposed Lorry Park because we do not believe that it provides a viable 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 will result in long term environmental and health issues for Stanford, surrounding villages and their residents.

Notwithstanding our opposition to the Lorry Park SPC welcomes this opportunity to take part in the latest Highways England (HE) consultation on their proposals for the design and operation of the proposed Operation Stack Lorry Park at Stanford West. Unfortunately our participation in this consultation has reinforced our concerns about many aspects of this proposal and the Lorry Park's overall viability. Despite the fact that HE have been working on this proposal for nearly a year none of the key project documentation has been completed. Indeed given that none of the documentation or plans available during this consultation is finalised we find it difficult to comprehend how the Secretary of State for Transport will be able to make a fully informed decision on project's future.

SPC sincerely hopes our detailed responses to HE's questions below will inform a significant redesign of the Lorry Park, otherwise it will be a costly failure, which is not fit for purpose. In summary our main concerns with the current plans are as follows:

- Amazingly for a project with a budget of £250m there is no cost benefit analysis, which was highlighted in the Transport Select Committee's June 2016 report. Indeed the three main benefits of the park claimed originally by HE have all changed or are open to question:
 1. The lorry park would be a solution to Operation Stack. HE now claims that it will only "alleviate" Operation Stack, without stating to what degree. However, it will definitely not enable a single lorry to reach its destination any sooner than is the case under current Operation Stack arrangements.
 2. The lorry park would remove disruption to local Kent traffic. HE now admit that Jct 11 of the M20 will close during Operation Stack and a repeat of the events of summer 2015 will see up to 5,000 lorries stacked on the M20.
 3. The Lorry Park will provide a solution to overnight lorry parking in Kent. This problem was going to be solved by planned expansion of commercial lorry parking facilities funded by the private sector. These plans have been shelved following the announcement of HE's lorry park.

In simple terms the UK doesn't seem to be getting much benefit for £250m.

- The Options Analysis Report (OAR) has as key selection criteria the need to deliver the project at pace (18 months) and for operation of the park to be uncomplicated. HE started planning 10 months ago and work has not yet started. HE have no operating plan, Jct 11 will be closed during Operation Stack and when an incident concludes the lorry park will take hours to empty as lorries continue to be fed in to avoid queue jumping. Consequently neither of these criteria will be met and, therefore, both the decision to select a lorry park as a solution and Stanford West as the site are flawed.
- The political imperative to deliver this project "at pace" means that HE are trying to progress the project without a complete Environmental Impact Analysis, detailed design, operating plan or operator. This presents the real risk that errors in decision making will be made resulting in a lorry park that is not fit for purpose and a waste of tax payers' money.
- None of the key project documentation is complete and there are numerous inconsistencies regarding operation and environmental impact throughout the project documentation.
- There is a complete absence of any assessment of the security risks posed by or to the lorry park.

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

While the indicative layout in the consultation document is overly simplified it is clear that it is very inefficient due to the illogical way it is shaped around existing properties and other features. SPC believes that such an inefficient design must be unusual in a major transport infrastructure project of this kind.

SPC's more detailed comments are based on Figure 1.2 of the Environmental Report which, is different from the design shown in the consultation document, but shows more detail.

The layout should be based on the anticipated traffic flows. While we have not been provided with the traffic modelling there are some indicative numbers in the Environmental Report. However, SPC believe the traffic figures have been underestimated, which impacts the conclusions in the Environmental Report and also the size of various facilities such as the proposed control booths. Specifically:

- the design assumes an average daily throughput of 4695 vehicles (including local vehicles not destined for the two ports), which is a 15% variance compared to the current reported throughput of 5400 vehicles through the ports.
- no allowance is made for variations to traffic flows on a seasonal, daily and hourly basis.
- no allowance is made for traffic growth from the opening year in the Noise chapter of the Environmental Report.

The layout does allow for some of the movements described in the operational descriptions in the Environmental Report. For further details on traffic see our answer to 4a below.

There is no access to the site apart from via the control booths on each side of the motorway. How will service and emergency vehicles access the park when the entrances are blocked due to accidents or queues?

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

The site boundaries appear to have changed since the start of the environmental studies. Several places in the text and drawings reflect a site envelope similar that published by Shepway District Council (SDC) December 2015. Please confirm that all data has been updated to reflect the latest layouts?

The environmental studies assume the lorry area will not replace or supplement Dover TAP. Please confirm this is the case and at what point a TAP event with lorries queuing as far as Court Wood, or Roundhill, becomes a Stack event?

HE's documentation outlines significant adverse environmental impacts in many areas, which confirms that the proposal presents a major infringement of our residents' right to peaceful enjoyment of their property. In a planning context this would never be acceptable other than in the most exceptional circumstances and would only be permitted if balanced by a demonstrable public good. The proposal may alleviate the frustrations for some Kent road users for the few days each year when Operation Stack operated historically. However, although requested by the Transport Select Committee, no net benefit to the national economy has been demonstrated which justifies the capital and operating cost required. Please confirm when a cost benefit analysis will be produced?

Further SPC believes HE's documentation underestimates the impact of the proposal in the following areas:

Air Quality

Modelling output from Junction 10a studies does not reflect the case where port traffic is instructed to use the M20/A20 route, as it would be for Operation Stack. Port of Dover estimates 30-40% of their traffic normally arrives via the Jubilee Way. When the lorry area is in use, this traffic would be diverted to the M20 at Dartford or turned around at Dover. In addition, there are several anomalies in Table 5.3 of the Appendices. Link 11 seems to be the main eastbound carriageway of the M20, from Figure 5.1. It appears the total flow of 4698 HDV in the do-minimum case would be divided 67% to link 28 and 33% to link 11 for do something (Op Stack). The remaining traffic on the motorway would be limited to 40mph per 5.5.20. The figures in Table 5.3 do not reflect this; specifically the percentage HDV appears too low. Also it is not clear why the traffic composition in the morning peak should be different from the other periods of the day.

Additionally it is unclear how hourly flows have been applied to links within the lorry area to calculate the hourly pollutant concentrations. Each 'Operation Stack' event can be expected to conclude with several hours where traffic is leaving the park at the maximum flow rate (approx 800/hr) while newly arriving lorries continue being routed through the control booths (to preserve queue discipline – see comments on traffic management below). The daily flow at links 25 and 26 will inevitably be higher than the average daily port-bound flow of 5400 vehicles as the queue is drawn down and the hourly flows may be much higher than implied by the numbers in Table 5.3.

Your assumption that increases in traffic flow in future will be completely mitigated by improvements in engine technology is not supported by evidence. Please confirm on what basis you will be making this claim to the SoS in his capacity as the decision maker for the proposal

At 5.5.6, the potential for adverse impacts on an hourly basis is dismissed with no supporting figures. Please confirm what work has been done to support this view? The screening method in the DMRB (HD47/08) would seem to be appropriate, if not mandatory. Similarly for particulates at 5.5.7.

Cultural Heritage

This section focuses on Westenhanger Castle and demonstrates a very limited interpretation of 'setting' while saying little about undesignated historic buildings. Recent planning decisions have confirmed that the definition of setting (the surroundings in which a heritage asset is experienced) is to be interpreted widely, and that harm to the setting of undesignated historic buildings is a material consideration. It is wrong to assert that erecting a bund and/or planting trees to limit inter visibility between a heritage asset and the lorry park can mitigate the harm to the assets setting. In rejecting the appeal at 'Waterside Park' near Maidstone (APP/U2235/A/14/2224036) the inspector considered the harm to the setting of a Grade I listed building much more remote from the site than Westenhanger Castle is to this development. Similarly, the inspector's decision on a solar farm development at Pluckley (APP/E2205/A/14/2215733) is relevant to the harm the lorry park will do to the setting of the Stanford Mill, Gibbins Brook Farm and the other historic buildings bordering the site.

In response to HE's first consultation the Kent Historic Buildings Committee mentioned a number of historic buildings near the site which have not been assessed in your study. One of these is Kennett House, which appears in both the Andrews map of 1769 and the Mudge Map of 1801. The harm to setting of Kennett House and others at Gibbins Brook would be substantial and should be included in your assessment.

There is also a need to consider the cumulative impact of this proposal, and not just the impact on each heritage asset individually. Historic England's latest guidance on this in the context of the definition of cumulative impact from the 2011 version is as follows:

"Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust and vibration) arising from a single development or from the overall effect of a series of discrete developments (CLG 2006). In the latter case, the cumulative visual impact may be the result of different developments within a single view, the effect of developments seen when looking in different directions from a single viewpoint, or the sequential viewing of several developments when moving through the settings of one or more heritage assets. Some cumulative impacts may also have a greater combined effect than the sum of their individual effects, sometimes termed a 'synergistic effect' (ODPM et al 2005, 78)."

Maidstone Borough Council took note of this in rejecting a recent proposal for a solar farm, despite few of the historic buildings affected being directly inter visible with the project site. (MA/15/505974)

Landscape

The description of the lorry park's impact on the countryside in general and individual receptors is cursory at best. Specifically, classifying the extent of change to immediate surrounding area 'moderate' (7.9.28) cannot be compatible with the scale of the proposal. Much of the park will be impossible to or to hide the fact that the mitigation measures are man-made. Dropping 63ha of concrete, buildings, bridges and associated lighting into the natural amphitheatre formed by the North Downs and the Aldington Ridge will have an obvious Major Adverse impact on its immediate surroundings. It should be noted that SDC have designated the land immediately North of Kennett Lane as a Special Landscape Area, which is not mentioned in HE's assessment.

At 7.7.22 you mention that lighting on the M20 is limited to Junction 11 and the Stop24 Service Area. While HE have not yet set out proposals for the managed section of the M20 it seems likely that it can only be made safe if road lighting is added for the entire stretch subject to variable speed limits. Please confirm what is proposed as these considerations affect the impact of the overall plan.

HE's plans on display at public exhibitions do not state the lorry parks surface or define the heights of bunds and planting planned for mitigation. Please explain how HE can make a proper assessment of residual impacts to inform the SoS's decision these factors being known?

HE has classified the visual impact from viewpoints VP9, 10, 11 and 13 as 'moderate adverse', reducing to 'slight adverse' by year 15. The lorry park will be obviously visible to users of the North Downs Way for most of the designated route from Farthing Common to Tolsford Hill, especially in winter and at night due to its lighting. Details of any additional lighting required on the motorway will only add to this impact, so should be considered now.

At 7.7.10 HE describes the Sellindge LCA as having 'very limited potential for natural habitats'. Then at 7.9.18 you note a 'loss of small areas of woodland and scrub'. The area around the Hayton Stream has been jealously protected by its owner as a nature reserve for many years and it appears about half of it will be lost, which is not 'small' in light of the lack of natural habitats in the area and should be preserved.

In this section HE makes no consideration regarding views from the motorway. For much of the route from Ashford to Folkestone, views to the north are already obscured by cuttings or noise barriers. If this project progresses there will be no view of the Downs at all between the urban areas of Ashford and Folkestone apart from a short stretch near Smeeth. The impact on Kent's attractiveness to visitors should be considered.

SPC has no comments on Chapters 8 and 9 except to note that Appendix 9.2 contains many inaccuracies and is based on a smaller site than is currently proposed.

Materials

The quantities in Table 10.4 appear to be based on asphaltic surfacing throughout. Elsewhere in the EAR (2.3.7), HE state it will be all concrete while we were told at one of the public exhibitions that the Northern part will be concrete and the Southern part 'tarmac'. The choice of (rolled) concrete is clearly based on the political decision to proceed "at pace". Please clarify what actual mix of materials is intended and whether other more environmentally friendly, less visually intrusive and quieter surfaces have been considered.

Noise

As with air quality, this part needs a review of traffic numbers and a sensitivity test on the proportion of port-bound traffic entering from East and West. While it is understandable to use 'short-term' criteria to assess the impact of the Operation Stack operating case that does not mean short-term traffic flows (opening year) should be used. Traffic numbers should be scaled to a year in the future based on accepted predictions for a doubling of port traffic in the next 10-15 years.

The traffic management method here differs from that in Chapter 5 as to how vehicles will move across the bridge between North and South, e.g. Technical Appendix 1.2.4 states 'a proportion of lorries ... proceed to ... the south ... via the new bridge'. Please confirm what proportion and why as the bridge due to its gradient and height will be a major source of noise.

In 1.2.4 of the Appendix and Table 1.1, the daytime flow rate is given as 264 per hour, whereas SPC believe the figure to be approximately 334/hr. At night, the AAWT should be about 143/hr. Both of these figures are for port traffic only at the current average daily throughput of 5,400 lorries. See derivation of these numbers under 4(a) below.

At one of the public exhibitions SPC were told that for daytime noise, the figures in Table 1.1 on page 4 of the Appendix were used for 17 hours and the 800 veh/hr applied for one hour, which is unrealistic. When the ports are congested, vehicles will arrive at a normal rate and leave at a reduced rate. Once the blockage clears, vehicles are likely to be arriving at a normal rate and the ports will be loading as fast as possible for several hours, not just one hour. At 800/hr, if achievable, the park could take $3600/(800-334) = 8$ hours to empty and even at night will take at least $3600/(800-143) = 5\frac{1}{2}$ hours. Noise levels over the 6hr night-time period in that case could be 12dB ($\sim 800/52$) more than HE have estimated.

It is disappointing, but characteristic of much of this projects planning, that HE does not have a clear idea of the character of noise generated by a lorry park versus normal roads (11.5.3). For this unprecedented infrastructure project where noise is a major environmental factor, HE should have base line measurements from existing lorry parks to verify your modelling and allow the SoS to make an informed decision.

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

SPC notes that many of the significant adverse impacts identified for this proposal derive from its unprecedented size. For example, by collecting all lorries destined to cross the channel in one location, the noise generated as lorries are released to the ports will be louder and will continue for longer than if lorries were held in a series of smaller parks distributed throughout the road network as we and many other respondents to your first consultation suggested. There would be similar advantages for air quality, while for visual intrusion, although more places would be affected, the ability to successfully mitigate the impact from smaller sites is greater. Also some smaller parks could be more easily sited in locations which are less environmentally sensitive than the current proposal.

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

a. Traffic management

The concept of using the lorry area for Operation Stack has not been supported by any evidence of a viable operational plan at this consultation. Indeed, HE has yet to find any party interested in operating the site. Indeed SPC believe operation of this park will be more

complicated than the present Operation Stack. There is no historical evidence or modelling to support the contention in the OAR that this 'solution' for holding lorries is 'fully workable' and more so than Operation Stack.

Most Operation Stack events are short-term, often lasting from mid to late afternoon and being cleared overnight. As such, the start-up and stand-down phases of a Stack event are key parts of the operational model and require more consideration in the environmental assessments.

Start-up

SPC understand that from the time a decision is made to implement Operation Stack to the necessary control points being set up on M20 junctions takes approximately 3 hours. When an operator is found for the lorry area will they will require up to three dozen specially trained staff at short notice, during the working day, to man the park. Experience from January 2015 shows what happens when staff without recent experience of a Stack event have to manage traffic. Even though the staff involved were professionals with experience of managing traffic mistakes led to unnecessary congestion.

It is unlikely that the three hour start-up time can be reduced with the proposed lorry area, especially as at present HE have admitted they do not know which agency will be responsible for calling a Stack event. This means that traffic congestion between J11 and the ports will quickly become unacceptable and there will be a temptation to divert port traffic to the lorry area before the control booths are (fully) open. It will not take long for a queue to form which will stretch back to the main carriageway. The entrance road as drawn has space for about 125 lorries which would fill in less than 30 minutes if the booths are closed. It is not clear whether the resultant need for the booths to work over capacity to bring the queue within the site during the early hours of a Stack event has been properly modelled. Please confirm which agency will be responsible for instigating Operation Stack in future and the pre-Start Up rush has been modelled.

Alternatively, if the intention is to call 'Stack" at the first hint of congestion to mitigate Start-Up problems then Stanford will be subject to more disturbances than the 8 per year used in the environmental models.

A recent survey at the Eurotunnel entrance showed it took 70 seconds to process each lorry, whereas HE have given figures 40 seconds for service time at the booths when questioned at the public exhibitions.

As mentioned above, the entrance through Stop24 will need to accommodate both queue-jumpers and also trucks using the M2/A2 route to Dover if they are re-directed to the lorry area.

'Normal' operation during a Stack event

The scenario once the park is up and running is the one which has been used for the air quality and noise assessments when there is a steady flow of vehicles in and out of the park. This would be in the case of a prolonged event lasting days when drivers will have learned the system and queue-jumping will reduce. However, it may not be conservative to assume that only 67% of lorries arrive from the West and as noted above, these 'steady state' conditions may not last long or at all.

Stand-down

When the ports restore full capacity, with the existing Operation Stack it is more or less a matter of releasing the queue and allowing other traffic to join at the back. With the lorry park

presumably all lorries, including local trips, will have to be routed through the park in order to keep queue places for those already parked up. This discipline will be almost impossible to enforce once word is out that the ports are fully operational again. Will there just be a free for all? If not, and lorries on the motorway are somehow persuaded to route through the park, the queuing system will have to remain in place long after the ports re-open with attendant staff costs, much frustration for drivers and prolonged disturbance to residents. Could you please set out exactly how this phase of a Stack event is expected to work?

HE staff at exhibitions gave conflicting accounts of how lorries will be released from the park so that the Jct 11 Eastbound off-slip can remain open and other traffic can safely use it for access to Stone Street and A20 to Hythe. Non interference with M20 traffic is a design requirement for this project and yet HE have now admitted that Jct 11 will need to be closed during Operation Stack. The arrangements for Junction 11 operation must be confirmed to see if original design requirements are to be met.

HE's documents do not specify how lorries arriving via Stop24 in a Stack event will be handled. We were told they will park in the Southern portion of the park and be released direct to the M20 when appropriate, although the Southern portion is not set out for a queuing. Clearly, if 33% of lorries enter via the South park, which has only 500 spaces, some will need to go directly to the North side to be queued. The layout shown in Figure 1.2 does not seem to allow this movement, without this traffic having to cross lines of lorries being released from the Northern lanes.

As mentioned above the traffic flows used by HE are too low, even for the opening year. The port throughput figure of 5,400 freight vehicles a day, each way, is widely accepted and an average over the year. Work done for Port of Dover some years ago found little seasonal variation month by month, but more freight travelled mid-week than at weekends. Wednesday Flows were 30% higher than the average for any week. Hourly flows for outbound freight were highest from 14:00-18:00 and almost as high from 18:00-22:00.

b. Security

Stanford and Sellindge residents have genuine concerns about the security threat posed by a 4000 strong transient population crowded into a place with nothing to do. These concerns will increase if all-year-round overnight parking is allowed to expand onto the North side of the motorway. At present no assurances have been given that overnight parking will be restricted to the South side and HE have admitted that they do not have a detailed security plan as they are not aware of the threats posed both to the site itself and local communities.

c. Operation of overnight parking

With current surface levels on the Southern part of the site it appears impossible to erect noise and visual barriers high enough to screen the park effectively. Please confirm what exactly is proposed?

Plans for how pedestrian access from Stanford (North) to Westenhanger station is to be maintained are not documented. It is essential that this PRow is preserved and separated from lorry traffic to/from the Southern park at all times.

d. Management in general?

It is essential that the operator selected to run both parts of the site has extensive knowledge of managing freight facilities and is involved in both defining both the operating and physical design. At present there is no clear understanding of the roles of the operator, police, HE, Eurotunnel, Dover Port, ferry companies and Channelports in a Stack event. It is vital that this is clarified before the design is finalised.

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

The suggestion that 'portaloos' be provided on the Northern side during Operation Stack is short sighted. Appropriate facilities should be provided in sufficient number to encourage drivers to use them.

Facilities will also be required for lorry park staff and of other agencies which have staff on site during a Stack event. Please confirm what is planned as no details are give in the consultation documentation.

HE has not specified details of the lighting scheme but it is hoped that 12m high light masts across the park will be avoided. Low-level lights should illuminate walkways and areas around toilets. SPC believe that general area lighting for queuing areas would offer a marginal safety benefit not justified by the associated negative visual impact. Most of the motorway currently used for Operation Stack is unlit. Similarly SPC urge HE to avoid overhead gantries relying on fixed road markings and variable lighting in the pavement to guide drivers.

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

SPC believe the main commercial parties and public agencies should meet periodically and after each Stack event to assess the success of the operation. Representatives of hauliers and the local community should be also involved. Also, the effectiveness of the agreed operational environmental mitigation measures must be measurable and enforceable and reviewed periodically with community input by an agency with the authority to improve them if necessary.

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

No

8. Do you have any other comments?

The OAR reveals two important criteria used in the system and site selection process:

- the need to have the project constructed as soon as possible (target 18 months, but with no start date specified); and
- the need for the operation of the park to be as uncomplicated as possible ('practicability').

Having reviewed the documentation available during this consultation SPC believe many questions regarding how the lorry area will be designed, built and managed remain unanswered, despite over a year of study and design work. Elements of the design process, such as baseline surveys, must inevitably take time but establishing an operating model should not unless there is insufficient knowledge available to solve the problem. It is becoming clear that the park will not be delivered in 18 months and that its operation will be far more complicated than Operation Stack itself. HE's OAR claimed the opposite and indeed identified these criteria as key to selecting a lorry park as the solution and Stanford West as the preferred site.

The desire to deliver this project "at pace" is purely political and is having the unintended consequence of pushing HE's design team to some very poor decisions. It is not inevitable that the conditions which caused Operation Stack in 2015 will reoccur. Indeed historical evidence shows that this was a one in 20 year event and that in general Stack operates only once or twice a year.

The OAR also materially overstated the technical difficulties in providing a technology solution for informing drivers and hauliers of their place in the queue and ETD of ferries and trains to allow them to make their own travel decisions. It only requires a traffic information system, not a command and control system.

A significant proportion of respondents to the Transport Select Committee advocated a distributed system of small lorry parks throughout the country to alleviate the problems of indiscriminate parking ('fly-parking'). This issue was discussed in Parliament this month with general agreement that a solution is needed. These small lorry parks have the social and economic benefit of paying for themselves as commercially viable operations. They would also provide the infrastructure to allow our proposed traffic information system to run effectively. This option was not explored at all in your OAR despite a number of respondents suggesting it. Consequently HE's OAR is incomplete and, therefore, flawed. Please correct it and ask the Secretary of State for Transport to review the decision made by his predecessor in July 2016.