

My response to Environmental Impact question 2:

As a long-term environmental and catastrophe planning professional the following expresses my serious concerns about environmental impacts of this site

Air quality and air pollution

The law requires that a suitable and sufficient assessment of the risks to health which arise from exposure to hazardous substances is made, e.g. DEEEs. No professional and impartial assessment or modelling has been conducted on the impacts of periodic, massive exposure to DEEE's would make on this site and the surrounding villages, indeed populations in Kent in general

The air pollution levels from up to 4000 vehicles will act as a massive dose of diesel smoke and fumes to all local residents - potentially causing lung disease and cancer. Evidence from the UK's own Environment Agency and Health and Safety Executive listed below outline the potential diesel fume impacts.

If the site goes ahead all local residents should be subject to yearly health checks and if it is shown that health impacts are above the national average for asthma, lung disease and cancer the site should instantly be closed by the Health and Safety Executive. Of course, this will be closing the door after the horse has bolted and the Government should put the health and wellbeing of people above profit and would be subject to litigation and indeed imprisonment of those who were responsible for making this decision. Governments are not above the law.

According to the UK Environment Agency -

Breathing large quantities of diesel vapour may cause non-specific signs and symptoms of poisoning such as dizziness, headache and vomiting. A severe form of lung damage called pneumonitis may occur if liquid diesel is inhaled directly onto the lungs

Key Points on Diesel

Fire

- Flammable
- Vapours may be violently reactive with air
- Use foam and liquid-tight protective clothing with breathing apparatus

Health

- Toxicity occurs following ingestion, inhalation & skin absorption
- Possible carcinogen
- Irritating to eyes and skin
- Aspiration may cause serious lung injury

Environment

- Avoid release into the environment
- Inform Environment Agency of substantial incidents

According to the UK Health and Safety Executive the composition of Diesel contains DEEEs contain a complex mixture of gases, vapours, liquid aerosols and particulate substances. These substances are the products of combustion. The main chemical constituents of diesel engine exhaust emissions

Carbon (soot)

Water (H₂O)

Carbon monoxide (CO)

Carbon dioxide (CO₂)
Nitrogen (N₂)
Oxides of nitrogen (NO_x)
Oxides of sulphur, eg sulphur dioxide (SO₂)
Alcohols
Aldehydes
Ketones
Various hydrocarbons (HC)
Polycyclic aromatic hydrocarbons (PAHs)

Smoke and Soot Impacts

Exhaust emissions from diesel engines are usually more visible than those emitted from petrol engines because they contain over ten times more soot. In general, diesel engines produce less carbon monoxide than petrol engines but more oxides of nitrogen, sulphur oxides, aldehydes and particulate matter. The soot particulates in DEEEs have hundreds of organic substances adsorbed onto their surface, some of which are potentially more harmful to health than others. The soot content in the DEEEs varies from 60% to 80% depending on the fuel used and the type and condition of engine.

Three types of visible smoke may be produced during combustion. These are: blue smoke (mainly oil and unburnt fuel) which is caused by partly burnt fuel from badly worn engines which are poorly serviced and/or tuned; black smoke (soot, oil and unburnt fuel) which is produced if there is a mechanical fault with the engine, such as a defect in the fuel delivery system or if the engine is working near its maximum speed; and white smoke (water droplets and unburnt fuel) which is produced when the engine is started from cold, and disappears as the engine warms up. Improved engine maintenance will not reduce the quantity of white smoke produced. White smoke from older engines produces an acrid smell.

Prolonged exposure to DEEEs, in particular to any blue or black smoke, could lead to coughing, increased sputum production and breathlessness.

Diesel engine exhaust emissions contain many known carcinogenic substances, for example Polycyclic Aromatic Hydrocarbons known as PAHs which are adsorbed onto the soot particulates. These particulates are easily inhaled into the respiratory tract and there is epidemiological evidence, which indicates that sustained exposure to DEEEs may result in an increase in the risk of lung cancer.

In order to carry out a suitable and sufficient risk assessment you need to ask a series of questions, find answers and then come to a conclusion. These questions include:

How likely is it that exposure to DEEEs will happen?

Who could be affected, to what extent and for how long? How many people are potentially exposed to the DEEEs?

Can the exposures be avoided?

None of these questions have been asked. The pollution of this site could have wide ranging impacts in Kent and beyond.

DEEE's in the wider environment - no pollution risk assessment/ modelling

impacts to wildlife has also been conducted.

Given the unprecedented scale of this development there has been appalling lack of testing and MODELLING of the potential environmental and health impacts of this site and the 4000 lorries is evident. Simply monitoring current air pollution levels is absolutely a fool hardy way to responsibly understand the impacts. I could go on!

Impact on wildlife/ Ecology

There has been no scientific assessment of impacts on local wildlife including all forms of flora and fauna. Building synthetic pools for wildlife can never replace natural habitats. Also, what are the risks of the toxic levels of pollution mentioned above on animal and plant health. I have deep and serious concerns on the level of due care taken on Wildlife impacts within this project.

Light Pollution - the site will undoubtedly cause serious issues to local peoples daily lives. Light pollution is said to have both serious mental and physical health impacts. It should be remembered that local people chose to live in pristine countryside and not the largest lorry park on the planet. The balance between people feeling safe within their daily lives and being disturbed due to light is an impossible balance to achieve. Screening with vegetation will not be possible for many years.

Flood hazard - CPRE have clearly listed the potential flood impact of the site. As an environmental modelling professional myself the lack of professional water and flood modelling on this site is simply quite astounding.

Noise

It does not take a rocket scientist to understand that the impact of thousands of lorries in terms of noise will have huge, industrial scale noise impact. Once again, the countryside communities who purchased their properties to live in a peaceful environment will be subjected to high levels of stress caused by the noise.

Anti-social environmental impacts

The residents of Kent are well aware of the disgusting and unhygienic behaviour of many lorry drivers. Litter as well as bodily fluids (including urine) are regularly littered across the region. The park will not stop this. Thus residents are increasingly being subject to the potential of disease from living in unhygienic conditions. The site will undoubtedly increase these impacts.

Impacts from fire and unprecedented fire risk

Although the local fire brigade have commented on this site - the findings are completely inadequate for a site with 4000 lorries. Parking grouping with fire breaks may help to mitigate this a little. However, we are not talking about a site comparable to any other ever created on the Planet. I do not believe a local fire team have the necessary expertise to truly understand the impacts of a massive fire on site - given that:

Diesel is one of the most flammable petrochemicals

That lorries may be loaded with toxic chemicals, high flammable goods,

explosive materials, petrochemicals etc. etc. the fire risk is huge.

Drivers and passers by smoking are a risk

Prevailing wind conditions (intensity and frequency set to increase as a result of climate change)

Prevailing heat-wave conditions (set to increase as a result of climate change)

Increasing intensity and frequency of storm events that include lightning strikes

Local wooded areas - including green shields - become a fire hazard

Terrorist Threat - currently severe

The site Fire risk will continue to increase over the coming years and this has not been taken into account by the fire authority and has not been modelled for fire risk and the risks and likelihood of fire spread. We simply cannot assume that the local fire authority has the expertise and the knowledge and capacity to model these risks.

Huge fires as a result of thousands of lorries catching fire would cause a massive risk to people, property and assets and if it turns into wildfires as experienced in the US and across Europe, the responsibility of building such a massive fire risk would be lain entirely at the feet of those responsible for decision making on this site.

Climate-Change impact and mitigation

In Paris in 2015, the UK signed the Paris agreement to fight climate change.

This type of huge initiative that will encourage increased road and freight traffic and result in increased emissions loading into the atmosphere, is directly against spirit of the agreement. Our pledge was to cut emissions by 40%. It appears the Government, using Highways England, in proposing this initiative is as a result of very poor and unimaginative infrastructure and transport planning strategies. We should be considering how we reduce road freight transport and not doubling it as we have been told is the case at Dover. This initiative is locally, regionally and globally irresponsible. Please be reminded about what the world has agreed to achieve: https://www.youtube.com/watch?v=5Tf5Hxa_dKs .

Politicians, particularly those towing the line in Kent on this initiative, need to be educated as to what this global agreement means and how Kent is woefully letting its people and the world down.

In short, this initiative to park 4000 lorries in 250 acres is an offence to the environment and the people of Kent.

My responses to questions 6:

A full environmental impact assessment should have been undertaken. The EIA should be converted into a risk register and graded in terms of risk. Operations of the site should be managed by a committee of local residents and the contractors themselves.

This body needs to have decision making responsibilities (teeth) to avoid environmental and social impacts on local communities, flora and fauna and landscape and should have the power to visit the site without notice.

This committee should have the power to visit the site at anytime.

Contractors contravening the EIA risk assessment/ mitigation plan should be dismissed immediately.

To other concerns:

Sexual and Child discrimination

This development directly discriminates against women and children in particular, and minorities (in terms of countryside people).

For women and children, the mental and physical well-being and safety is at extreme risk. The influx of what is likely to be 4000-6000 men at any one time is extremely worrying to women. Risk of assault, sexual assault, abduction increases exponentially. The influx of prostitution will also increase this risk to women and children.

The rights to living without fear are impinged on a permanent basis, taking away womens rights away to live freely and equally under the law in the villages surrounding the site.

Security

The influx of 4000-6000 men is also likely to increase crime and anti-social behaviour, increasing physical and property risks to local people. Local police are inadequately resourced to police the area seriously.

Economic incentives and assessment

There appears to be no/ or very minor economic incentives in this site being located in Kent whatsoever. Most freight traffic simply passes through Kent, with income coming only to petrol stations and services and the Port of Dover. Increased cost to local authorities on damage to local roads and facilities, policing, rubbish collection, lighting, poor health etc. etc. etc. will all ultimately be paid for by local people, continuing to reduce substantially the quality of life of the people of Kent, at the benefit of a few large companies.

Transport Strategy

The lack of a forward thinking transport and freight strategy has caused the problems we are discussing through this development. There are other options in particular the 'Call down' system App promoted by CPRE which could avoid operation stack entirely and save the tax payer £250 mill.

We should be challenging the assumption that increased traffic through Dover is appropriate for the whole region. Impacts should be born in other parts of the country not predominantly Kent.

Misrepresentation on previous consultation

Many people on the previous consultation refused to partake in the consultation as there was no tick box for 'I do not want this development'. Therefore the results were hugely skewed in favour of the development,

resulting in an unrepresentative survey.

Compensation and blighting

It is clear that all of the surrounding villages will be hugely blighted by this development and should receive adequate compensations not just around loss of property values, but many other life degrading points, including health and safety impacts.

The current complete lack of transparency and process information is causing local people huge hardship and severe stress. The Government and HE need to fully recognise this and deal with people compassionately and fairly.