

Proposals for a lorry area at Stanford West~ Response from Campaign for Better Transport

Summary

We welcome the opportunity to comment on proposals for a dedicated lorry holding area at Stanford, near Folkestone, to relieve the current pressures on the strategic road network caused by Operation Stack.

We agree that HGV volumes through Kent are at an unsustainable level: however, creating a major lorry park can only be a short-term solution, and a strategic change of policy is required. Simply perpetuating the problem by relocating it is not a sustainable solution. We believe the long-term solution lies in a strategic move to freight on rail, combined with increased use of ports north of the Thames.

HGV management

We support the provision of better rest facilities for HGV drivers including alongside existing routes. Without such provision, there is abuse of laybys and emergency refuge areas, with particular hotspots reported at approaches to major road freight terminals, for example on the A1089 in Tilbury. As the recent study 'Take a Break' by Transport Focus reported, *"They told us their needs are often not fully met. They feel there are too few spaces for heavy goods vehicles (HGVs) to park at the locations and times they need to stop. Even when there is space to park, what is provided does not always help drivers rest properly before getting back behind the wheel. Many lorry drivers and organisations in the freight sector tended to have the view 'The law says I must stop and rest, but nobody helps me do it.'"*¹ This is a network-wide issue which requires a comprehensive solution, rather than committing £250M to a single facility.

We believe there are a range of measures that could improve capacity and resilience of the existing network, including use of new technology to facilitate dispersed 'smart queuing' and variable speed limits to manage flow, and resisting the introduction of longer lorries that will consume more road and parking space.

Environmental impacts

There are significant environmental concerns about the proposal, which will inevitably increase HGV traffic on local roads, with no benefit to the local community. The site is located close to an SSSI and an AONB, setting a poor precedent. The assertion that the overall air quality effects of the lorry area are not expected to be significant is reliant on the existing low air pollution levels in this rural location, and is at odds with the known air pollution impacts of HGVs. Baseline assessments that rely on notional emissions levels are questionable given that up to 95% of diesel vehicles on the road are currently breaking air pollution limits in real world operation compared to lab tests. The adverse environmental impacts will be permanent, the projected £250M budget is major expenditure, yet the solution to HGV road capacity is only a temporary one: this is a poor bargain for the public purse.

Role of rail freight

The capacity challenges are a consequence of excessive road-based freight movements through Kent. Of the top ten UK ports, Dover had the largest percentage increase in tonnage² with 2.42 million freight vehicles handled in 2014, 2.5% higher than the previous record of 2.36 million set in 2007.³

¹ Transport Focus: Take a Break Road users' views about roadside facilities July 2016
<http://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2016/07/26114826/Take-a-break-roadside-facilities-July-2016-FINAL.pdf>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/465439/port-freight-statistics-2014.pdf

Given the high external costs HGVs impose on Kent's roads there would be huge merit in shifting truck traffic to rail. This approach would be in line with the Government's recent Rail Freight Strategy, which calls for "*the broader logistics sector and rail industry to collaborate and innovate in order to help relieve the pressure on our road network.*"⁴ Rail and road complement each other and rail is well placed to offer long distance consumer haul as well as bulk traffic.

There is great potential to use the Channel Tunnel rail link and HS1 for unaccompanied HGVs to go to Barking and avoid Kent. This type of services, which transport the HGV trailer without driver and lorry cab, already operate from Spain to Calais (run by LOHR) and from Germany to Italy (run by Cargo Beamer). There could be huge congestion, environmental and social benefits of such a solution which now needs a scoping exercise to look at viability which Kent CC could lead on with other local authorities.

There is already access from HS1 to terminals at Barking and Calais providing potential to run long distance services from continental Europe. There is considerable support for further investigation of this option from CPRE, haulage industry and rail freight industry advisers. There would also be significant benefits for air quality: HGV road journeys produce 76% more CO₂ than the equivalent freight by rail, 90% more PM₁₀ and up to fifteen times more NO_x.

Use of ports north of the Thames

A strategic re-routing of freight to alternative ports including Thames Gateway and Tilbury (which have the capacity and would welcome the business) rather than reinforcing over reliance on Kent's roads, and further degradation of the county's environment, would be a better solution than a new lorry park in Kent. DP World London Gateway has ample capacity, served by a state of the art rail terminal, the largest in the country, with six 750 metre long rail sidings.⁵ Tilbury port, including the London Container Terminal (LCT), also has capacity to take extra freight without requiring additional road or rail infrastructure. In many cases these ports are nearer to the next destination of the goods in transit and so represent a smart operational choice as well as a more environmentally sustainable one.

Charging

Should the lorry park go ahead, we believe it is appropriate to levy a charge for its use. HGVs are currently costing taxpayers £6.5bn a year, paying less than a third of the environmental, maintenance and congestion costs they impose on society. We would like to see the proceeds from any such charge ring fenced for investment in shifting freight to rail; better maintenance of the local transport network; and environmental mitigation of the HGV impacts on the local area.

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Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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³ <http://www.doverport.co.uk/about/news/port-of-dover-celebrates-record-breaking-freight-b/12937/>

⁴ DfT Rail Freight Strategy, September 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/552492/rail-freight-strategy.pdf

⁵ <http://www.londongateway.com/the-port/#access>