PROPOSED LORRY PARK AT SELLINDGE

A REPORT FOR STANFORD PARISH COUNCIL

By

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QUALITY PARISH COUNCIL

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EXPLANATION

Continental gauge or continental rail gauge

There are several references to this in the following report. This term has been used as a general reference and does not mean that UK railways should be converted to a much larger gauge that all continental wagons can run on. The difference between **track gauge** and **loading gauge** is as follows**.**

Track Gauge

This is the distance that the rails are laid apart. In the UK this is 1.435mm (4ft 8½") but although the UK, even in 1914 still had about 8 different gauges used on minor railways, some of which are still in existence.

In Continental Europe this track gauge is the same, except for some parts of Spain and Finland. There are some minor railways (principally in Switzerland) which use metre gauge or less. This means that a vehicle built to run on the UK Nationalrail system will "fit" on the tracks of Europe and *vice versa*.

Loading Gauge

This is far more problematic. The loading gauge refers, basically, to the size and weight of the wagon or coach that is conveyed on the tracks. The UK system was built to smaller dimensions than most of Europe and it is this which causes the incompatibility with the continent. It is also the standard practice in this country to have high platforms which allows easier access/egress for passengers. In Europe this is not the case, with access to passenger vehicles being from low platforms which requires steps built into the access points of vehicles. If a continental gauge coach was allowed to pass through (say) Westenhanger station, it would hit the platform. It is also the case that continental rolling stock is taller than British stock, so in most cases these vehicles would not be able to pass through tunnels in this country. The weight of the vehicle must also be taken into consideration as (like the roads) there are weight restrictions on certain structures (such as bridges) scattered throughout the railway system. Also in Europe there is not just one Loading Gauge, there are many, depending on the route the vehicle is required to pass over.

Due to these constraints it is accepted that the larger width of general continental rolling stock make it impossible for these vehicles to use the existing railways of the UK. However, it is possible in many cases to increase the usable **height** of railway routes to allow the conveyance of large containers on wagons with a UK loading gauge which can run on UK railways. It is therefore essential that all new rail build in Britain should be constructed (and old routes altered as appropriate) to accept *a swap body multifret wagon (route code W12) with a maximum unit height of 9'6".*

Proposed Lorry Park west of Sellindge to the south of the M20.

Introduction

This paper is based on extensive research using the internet and other published material. Some of the key sources are listed at the end.

Since the completion of the missing link between Maidstone Jct 8 and Ashford Jct 9 and the modification of national road signs, the M20 has been the super primary route to Eurotunnel and Dover Port. Residents all along the route have noticed a surge in usage, a trend which has been increasing year on year because this road is effectively the only motorway route to Dover. The M2 has never been completed: it is just an A road from Dover to Faversham and again from Strood to the M25 junction. The section of the A2 approaching Dover is not even dual carriageway. It is a most unsuitable road to take heavy freight. So the vast majority of international traffic uses the M20 and it is this road which suffers the most when there is any interruption to the flow of ferries from Dover. As soon as the ferries stop for any reason, traffic rapidly blocks back and it is for this reason that Operation Stack was devised to manage the situation.

The figures

It has been calculated that currently Kent has to cope with 11,000 freight lorries a day destined for Calais and beyond, the vast majority routed via the M20, and this is now increasing by 10% a year. Since 1995 the number of vehicles travelling via the short sea route has increased by 72% and there is every reason to assume that this trend will continue. Please see the table below projecting these figures: those in red are for the time after the capacity of the Sellindge park has been exceeded by growth.

Lorries Per day		
Year	Growth 10%	Growth 5%
2007	10,000	10,000
2008	11,000	10,500
2009	12,100	11,025
2010	13,310	11,576
2011	14,641	12,154
2012	16,105	12,761
2013	17,715	13,399
2014	19,486	14,068
2015	21,434	14,771

Dover Harbour Board recognises that it cannot manage this flow of freight, and is making plans to increase the capacity of Dover Port. In 2005 there were 23,800 ship movements handling 2,555,000 cars and 2,046,000 lorries. Bob Goldfield, Chief Executive, Port of Dover, reports that the year 2006 saw in increase in freight movement through Dover of 13% over 2005. Dover Eastern Docks reaches capacity at peak periods now, and there is little or no prospect of expanding here, thus plans are in hand to further develop the Western Docks with another 4 berths with direct access from the A20/M20. These new facilities will be required by 2012 or 2013. Just how busy the Port of Dover is can be demonstrated by the fact that there is a lorry movement in and out of the freight terminal every 10 seconds. Once the new berths are constructed they will have direct access to and from the M20 which will further add to the overuse of this major freight artery. Bob Goldfield was concerned in his report to the public consultation meeting on the 25th January in Dover Town Hall that these new facilities were needed to prevent the total gridlock of Dover. He was silent as to what effect these expansion plans would have on communities along the M20 corridor.

The proposed 70 acre Lorry Park at Sellindge will have a capacity for 3,000 vehicles - the figures in red in figure 1 above which shows the year in which these 3,000 vehicles will be exceeded merely by the projected increase in road use. Assuming that the Lorry Park goes ahead and is built, by the time it is open taking 3,000 lorries off the M20, will make no difference: Operation Stack will be needed just as it is now. It will just be more complicated as the Lorry Park will have to be filled before Operation Stack takes place - although it must be said that if these 3000 lorries were on the road, even Operation Stack could not cope.

Illegal Parking

Every day in Kent there are about 1,000 lorries illegally parked overnight in lay-bys, industrial estates, motorway slip roads and hard shoulders. Most of those parked are inbound, and studies reveal that this is due to the concerns operators have about parking in Calais due to illegal immigration and the need to comply with the European Working Time Directive. It is interesting to note that Eastern European HGV drivers tend to park near to Dover and the Channel Tunnel using lay-bys on the A20 and A2, but Western European drivers favour the north of Kent, using industrial estates. Many HGV drivers interviewed for the study by Faber Maunsell said they favoured Kent for an overnight stop, rather than France, as they felt that security was better in this country. No HGV drivers liked to deviate far from their planned route to park overnight. Currently in Kent there are 450 spaces for lorries to park legally. These are locations at which there is a charge and, as there is a fundamental resistance to paying, lorries are increasingly avoiding these official sites in favour of free illegal ones. Indeed, some of the current spaces now available are threatened with closure.

It is proposed that the Lorry Park at Sellindge would have 500 spaces permanently available for this purpose which would be provided free. At a stroke the park would be full every day with these parked vehicles, and there is no room for expansion – apart from into the "closed", emergency part of the Lorry Park. The plans to park these vehicles legally take no account of growth in traffic. Studies by Faber Maunsell in July 2005 estimate that the use of

illegal parking spaces will grow by a factor of 2.5 between 2005 and 2014., and this means that the Lorry Park, if opened to prevent Operation Stack, would only have a maximum capacity for 2,500 lorries - and probably many less than that as the emergency part of the park would probably be substantially full.

If no action is taken the problem of illegal parking will spread into other counties as drivers run out of time and (being unable to find anywhere to park) drive out of Kent in contravention of the 3820/85 EU Drivers Hours Directive and stop in desperation anywhere they can. This could have a major impact on the M25 corridor and potentially could be very dangerous as tired drivers search for a place to stop.

Terrorism and Security

Security must be at the forefront of everybody's mind in these troubled times. If the Port of Dover comes to a standstill for whatever reason, and all the lorries heading for it are parked throughout Kent the target, although vast, is so spread out that any attack would do a tiny amount of damage. If 3,000 lorries are parked in a relatively small area it could potentially be a worthwhile target. A hit on this type of national infrastructure would potentially be very costly in lives and would certainly make headlines throughout the world. It would therefore be a prerequisite for this site to have very tight (and costly) security. Furthermore, to group 3,000 tired, frustrated and angry drivers in a relatively small space, with a rich mixture of cultural and national identity, could well spark trouble – which is much less likely at the moment. For instance, if the ferries are stopped due to French industrial action, tensions would rise between French and English drivers. This would have to be policed. There is also the risk of fire in this confined space which happens to be next door to another piece of infrastructure of national importance – the Sellindge Converter Station. Also lorries also sometimes carry cargo which is classified as dangerous. Presumably there would have to be strict controls in the Lorry Park to prevent these vehicles parking together and creating a potential chemical hazard.

Police Costs

Mike Fuller QPM (Chief Constable of Kent) complains rightly that Operation Stack, when implemented, ties up his entire traffic division. This means that all other roads in Kent are unpoliced during Operation Stack. He (and the tax payers of Kent) need a solution, but a Lorry Park is not it. Currently, when Stack is implemented the M2 has to be policed, turning lorries back that try to circumvent to queue. Operation Park (as it might be called) will not alter this requirement – nor will it obviate policing of the M20 as lorries will always try and find a way round, for example, by turning off at Jct 10 when the overhead information signs indicate Operation Park is in force, to try to get onto the A20. Police will be required *at least* at Junctions 10 and 11, Dover A2 and A20, the new junction into the Lorry Park (10a?) in both directions and in the Lorry Park itself. Many police will be required here to control 3,000 foreign nationals, although these would not need to be dedicated traffic police. There would not be much saving, if any. These costs could well mount well above what Operation Stack costs if any one (or more) of the many possible complications happens.

Operation Park when Dover and Eurotunnel are functioning normally.

Assuming that the Lorry Park is built, there is likely to be a temptation to use it as much as possible – consider the following scenario

- A major traffic accident occurs on the M25 westbound just in Surrey
- The road is shut and traffic builds up along the M26
- The Chief Constable of Surrey asks (now the facility exists) for Operation Park to relieve the chaotic situation
- London-bound traffic would be diverted into the Lorry Park
- Policing will be needed at Jct 11 of the M20 and Jct 10A, assuming that a way has been built into the park from the south carriageway – the side of the M20 the Park is going to be (if this access has not been built everything will have to go to Jct 10 and back – even worse!

As the M25 is getting even more congested than the M20 this scenario is a reasonable one. On 25 March 2008 Radio Kent reported that **one** lane of the M25 westbound was blocked in Surrey at 6am. The lane was reopened in 30 mins, but by then there was 15 miles of traffic at a standstill. Other police forces may well request Operation Park if similar scenarios happen elsewhere and the police in Kent are likely to be called upon when incidents happen outside the county. A robust system of chargeback would need to be in place to ensure that the Kent tax payers do not end up paying for a traffic jam in Hertfordshire or an accident in Surrey.

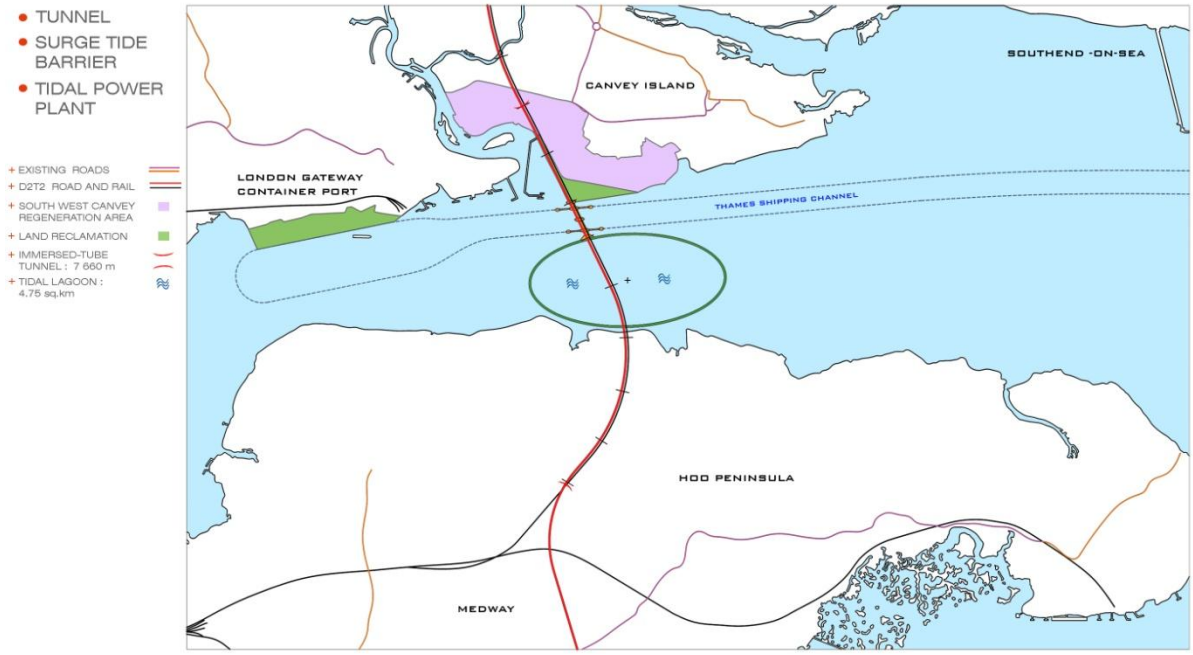
Suggested alternative solutions.

This problem with traffic overload on the M20 should have been dealt with 20 years ago. It was predictable and now there is a crisis. The unrestricted free market in transport has resulted in a transport system which is biased too much towards road. Rail operations have been hugely complicated by the Privatisation process. Health & Safety legislation has increased the costs of rail operations and the huge cost overruns on the Channel Tunnel itself has resulted in rail freight charges designed to recover this money – but which in reality strangled the railfreight customers. Many rail freight sidings have been closed (including all at Dover) and the Transfesa Depot at Paddock Wood, built to accept rail freighted wagons from Europe now only takes lorries. The classic line from Dover to Tonbridge and onward beyond Redhill was adapted at Headcorn with the addition of half mile long freight passing loops. They are never used. The Channel Tunnel Rail Link (now called High Speed 1, HS1) was built to carry freight, and freight passing loops were constructed, which allow the High Speed Trains to pass slower moving freight trains. The current maximum speed that freightliners are timed at in this country is 70mph (112kph) which compares unfavourably with the 180kph that a Eurostar or Hatachi Bullet Train achieves. Nevertheless a timetable which allows both passenger and freight to operate together on HS1 is perfectly possible.

Strategic decisions have to be taken – and fast. So, what can be done to relieve the chronic overcrowding?

(1) New Thames Crossing

An alternative has to be found to provide more space on the motorways of Kent and to relieve Dover and the M25. The way forward is to support the proposed Thames crossing (the Metrotidal Tunnel, see map below), planned from the Hoo peninsular in Kent crossing into Essex, emerging from tunnel just on the west of Canvey Island. Shellhaven has planning permission to develop into the major deep water port for London and the Southeast, and this project should commence immediately. Other ports with planning permission, such as Bathside Bay, Harwich and Felixstowe South should also be given the go-ahead. The new Metrotidal Tunnel under the Thames will take road freight as well as rail. By connecting with the M2 (including an upgrade of the A2 beyond Faversham to Dover), traffic for Dover that currently enters Kent via the Dartford M25 crossing will be able to take the new tunnel route and travel to Dover avoiding the M20 (and the M25) altogether.



METROTIDAL TUNNEL

If this project goes ahead the need for a Lorry Park would be much diminished as traffic should be much lighter and split properly on two motorways. – and furthermore, if one was built at Sellindge it would be in the wrong place. When the A2 is upgraded into a motorway, another "movable barrier" solution should be incorporated into it in the event of a freak stoppage at Dover. Developing Shellhaven and the other ports mentioned above should in itself reduce container loads transhipped from European Ports which currently are trucked through Dover. The South East Plan should give clearer guidelines on the development of ports and the transport structures to them. The rail facility must be built to a Continental

gauge and run alongside the road that would have to be built from the M2 to the tunnel at Hoo or if possible access via a southern spur at Ebbsfleet International.

(2) Movable Barrier

When a Lorry Park was suggested for Jct 11, Stanford Parish Council was opposed to it, but was in favour of a movable barrier. Although inconvenient, a barrier which divides a motorway so that half becomes a park and the other half an A road, is far preferable to a fixed park which takes up so much valuable green field space. Our view has not changed on this. It is understood that trials of this barrier are to start soon and that this system is likely to be introduced as a short term solution, until strategic developments such as those indicated above can be implemented. Although heavy in police costs, Operation Stack does not create additional problems from the new dangers that will be generated by building a park. In short, we would rather be slightly inconvenienced from time to time with the motorway here being reduced to an A road, rather than be permanently inconvenienced by a lorry park. This is the "least worse" temporary palliative. This concept is also referred to earlier in this report.

If the trials are successful, the movable barriers should be introduced widely and all thought of a lorry park abandoned.

Quick Movable Barrier on test

(3) Road onto Rail

The use of the Channel Tunnel to move freight is very limited and the amount of freight that was railed through Eurotunnel until October 2007 was virtually the same tonnage as was carried on the old train ferry – a single ship operation. Dollands Moor is almost as empty today as when it was a moor. It has been noted in many documents researched for this report, that Kent County Council has a policy for putting road freight onto rail – but there can be no substance in any of these aspirations until the necessary resources have been agreed. As recently as October 2007 the Channel Tunnel (apart from the Eurotunnel Lorry Shuttle Trains) was carrying just 4 freight trains a day. If the M20 was a railway there would be enough business for 200 freight trains a day. Even this tiny figure was threatened by the ending of the Minimum Usage Charge in December 2006, although, happily this situation was saved by the DfT agreeing to pay the fixed costs of EWS (English Welsh and Scottish) and similar support from the French Government was expected. Eurotunnel's financial position was secured in May 2007 after shareholders voted to support its Chairman's restructuring proposals.

It is encouraging that Europorte 2 (a subsidiary of Eurotunnel) has decided to purchase class 92 locomotives to operate freight trains through the Channel Tunnel. This has been prompted by a new realistic pricing agreement for freight trains through Eurotunnel from 2008, with a significant reduction to the pricing in 2007, and new measures to ensure cross-channel open access for all rail operators. These new conditions aim to implement real and efficient Open Access to infrastructure in line with European directives. Since the opening of the Channel Tunnel freight traffic grew from one million tonnes (under the train ferry system) to three million tonnes by 1997, but then declined back to one million tonnes due to the steep increases in freight charges, leading to a huge disparity in competitiveness between lorry and rail and the impact of fixed costs relating to security constraints. The new arrangements are designed to make rail freight competitive with road by guaranteeing open access and providing a simpler pricing structure which will lead to a 50% reduction in costs over 2007. The development target for the new train services is for 6 million tonnes..

Now the Channel Tunnel and problems on the French side of it have been sorted out, the challenge lies within the UK borders.

Dover Docks are not connected to the National Rail system – whereas, just over the Channel in Calais the number of freight sidings is almost countless. There is a need for the Government to work at the European level for higher priority and better services for rail freight. Additionally, the private sector needs to be encouraged to provide inter-modal freight terminals close to London to increase the attractiveness of rail freight. To reduce the impact of road freight through Dover requires significant Government grants for freight facilities and track access to make rail freight services to and from the port viable. The availability of the new route under the Thames at Canvey (Metrotidal Tunnel) is an opportunity to build a proper European Track gauge access across to the north of London

and beyond into North and Eastern England. Connections will be needed to the nearby HS1 via Gravesend together with a new south facing spur (a north facing spur is being built for the December 2009 timetable anyway). If this is not feasible, a new European loading gauge railway (4 kms long) will be needed alongside the new road spur from the M2 to the tunnel. It must be noted though that although High Speed 1 was built to take freight, no locomotives have yet been built that could haul freight on it because the line is signalled for in-cab operation only. A new class of freight locomotive will also be needed.

The original railway from Dover to London via Faversham and Strood is already connected to Hoo Junction which links with any new rail Thames crossing, but obviously it is built to normal UK gauge and Lydden Tunnel (1 mile and 609 yards) between Kearsney and Shepherdswell would be a major problem.

Stanford Parish Council welcomes the following policies in the Kent County Council's Local Transport Plan for Kent 2006 – 2011 which will deliver its policy LTP2 objectives.

- Support development which will encourage the transfer of freight from road to rail, including the development of freight handling facilities, unless there is an overriding conflict with other planning and environmental considerations[4].
- Safeguard land, formerly used for railway purposes, from development whilst supporting the use of such land to meet an identified transport need[4].
- Support land use development proposals that promote sustainable distribution, including where possible, the transfer of freight by rail[4].
- Continue to work with Kent businesses, District Councils, the rail industry and rail freight train operating companies to encourage the movement of more freight by rail.
- Continue to lobby Network Rail and Government for loading gauge harmonization between the Channel Tunnel and Scotland[4].
- Continue to press for capacity improvements for rail freight to be carried in and/or around London and for CTRL to carry conventional freight to East London[4]
- Continue to lobby for the implementation of strategic rail schemes, such as those identified in Multi-Modal studies, Mayor of London's Transport Strategy as well as other strategic schemes, such as Thameslink, North Kent Line capacity improvements, and Medway Valley Line improvements[4].
- Continue to press for rail freight access to the ports of Thamesport and Sheerness to be improved and for Dover Western Docks to be reconnected to the rail network[4].
- Continue work with Network Rail, District Council and rail freight train operating companies to protect existing connections to the rail network and to identify and safeguard potential terminal sites. Priority will be placed on safeguarding sites that are important to the construction of Programmed Strategic Transport Schemes[4].
- Work with the freight industry to identify suitable grant and funding initiatives to be used to facilitate the transfer of freight from road to rail.
- Work with the freight industry to identify potential legislative and physical barriers for transferring freight from road to rail and assist, where possible, in identifying solutions to overcome such barriers[4].
- Promote the social, economic and environmental benefits of rail freight.
- Recognize the operational requirements of modern rail freight.

[4] It is hoped that the objectives marked thus, above, will result in Kent County Council making sure that the rebuilding of Shakespeare Tunnel for the High Speed Hatachi service (due to start in December 2009) will enable this tunnel to accommodate European loading gauge vehicles and that the former Dover Town Yard will be protected – especially as Dover Harbour Board have aspirations to build four new berths in this area.

It needs to be mentioned that there is a brand new railway being proposed. Central Railway has been set up to promote an entirely new railway from Liverpool to Northern France,via Sheffield, Syston Jct, Rugby, Gerrards Cross, following the M25 to Mersham, and then via two additional tracks through Tonbridge, Ashford to the Channel Tunnel and onwards into France. It is proposed to build it to a "super gauge" which currently does not exist even in Europe. The trains will carry lorries or "double stacked" containers. This scheme is very much in its early stages. The railway may also have passenger trains to C1 gauge. It will operate trains 1,500 metres in length. The promoters of the Metrotidal tunnel need to be involved with this project.

(4) Parking Facilities

Because of the predicted increase in traffic levels on the roads of Kent, the problems with finding a rest area for lorry drivers (to allow them to comply with the European Working Time Directive), and because most illegal parking is done by in-bound operators, it is suggested that a secure parking and rest area should be built at Dover – ideally on the site originally identified by the Dover Harbour Board as their solution to Operation Stack. Consideration should be given for it to be a secure area and treated under European Law as having "International status" a sort of 'no man's land'. Any illegal immigrants found while the lorry driver is resting in this area could then be arrested and sent back to where they came, as technically they would not be in the UK. The site should be able to accommodate at least 1,000 vehicles. Once this facility is in place there should be punitive fines for illegal parking, with legislation allowing the UK to pursue foreign operators in the European courts. Having the rest area at Dover would allow operatives the choice of the M2 or M20 to continue their journey, again reducing the impact on the M20. As these problems have been caused by European Legislation, funding should be sought from Bruxelles to allow the building of modest off road parking sites throughout the country to allow lorry operators to comply with EU Directive 3820/85.

(5) Revenue Raising from Ferry Operators

The ferry companies do not seem to have any system of fines for providing a poor or cancelled service. On the railways, train operators are fined for a short train, a late train or a cancelled train. The track provider (Networkrail) is fined if it fails to provide the track or pathway for a train-operator's train. Once the timetable is agreed, no changes or deviations are allowed without consultation and penalty payments made. This should be the case for ferry operators. If a ferry is cancelled for bad weather that should be treated as an act of God, but if a defective ferry or a strike cause ferries to be delayed or cancelled, that should result in fines – monies that should go towards Operation Stack and the movable barrier. The threat that a strike would put a company (such as SeaFrance) out of business is no

different from the railways here, e.g., SouthEastern trains have to accept the risk that they will be unable to operate their timetable for 'act of God' reasons. It is up to the company to have good industrial relations, even a no strike agreement if necessary. There is plenty of profit in ferries from Dover to Calais.

Of course a reciprocal arrangement should be in place for fines to be imposed if for any reason a berth at Dover or Calais is not available due to defects or strikes. This process would need to be overseen by an independent body.

(6) Revenue Raising from Brit Disk

The idea of charging foreign registered vehicles to travel on the UK road system is attractive and needs careful consideration. This was proposed initially to KCC Cabinet on 8 February 2007. There is a risk that a "tit for tat" counter proposal will hit the pockets of UK operators, and it would be necessary for HM Government to argue that we are a special case. It is unlikely that this will solve revenue questions in relation to costs encountered when there is industrial action in France. Costs associated with weather delays are those that should be born without complaint, and there would, of course, be no weather-delay costs if freight went via Eurotunnel as trainload.

There is also a risk that if this system is introduced and foreign registered vehicles were charged a fee for entering the UK (at all ports – not just Dover) then as the revenue would be collected by HM Government – they might keep it and not pass it onto Kent. If monies were passed on there would be arguments as to what proportion Kent should receive. There is a further complication in that it may be necessary to charge all international lorry operators the Brit Disk fee no matter where the vehicle is registered. British firms would then have to recover this fee through the VAT system adding another layer of bureaucracy.

We believe KCC would be most unwise to rely on revenue from this source to fund (and maintain) a Lorry Park

Discussion

It might be argued that port of Dover would suffer from the development of more northerly routes to and from the near continent, but the capacity for the growth of Dover *cannot* be unlimited. As has been shown above, it is already in danger of being strangled by its own success. The development of the Western Docks is its last chance for expansion and even this is likely to be the cause of such an increase in traffic that access is regularly cut off It would also prevent the redevelopment of rail freight. The ideas above do not prevent the growth of Dover, they merely constrain *unrestricted* growth, and by providing better northerly connections are likely to enhance the quality of its development.

It can also be argued that something must be done NOW, and that the decision of KCC to implement plans for a lorry park at Sellindge is brave and necessary. It may be brave, but it

is also foolhardy. By providing the lorry park, a short respite may have been achieved – but at what cost? We suggest that the costs are considerable:

- Millions of pounds spent and acres of land will be destroyed
- Only a fraction of the daily burden of lorries will be accommodated
- Policing and other costs will be increased
- Dangers from terrorism will be greatly increased
- Long term, strategic planning will be delayed
- A precedent will be set for further lorry parks in Kent
- Short-term planning will be encouraged

The proposed lorry park at Sellindge, is a cheap, short-lived solution which has been shown, above, to be no solution at all. It would cost c £38 million to build and would be wasted money. Possible savings on the public purse by reducing police costs are very doubtful. Within (say) three years of a Park being built the increase in traffic will swamp the site and there will be demands for another site to be identified - this site is too small to be developed further. If this goes on, several unlinked and ineffective vast parks will blot Kent for all time.

The better short term response to deal with the rapidly increasing number of lorries at risk when the trans-Channel traffic is prevented, as has been argued above, would be the movable barrier, from junction 8 to 12 if necessary, and the use of the M2 west of Faversham for an additional Operation Stack, including movable barriers there.

The road industry is attempting to introduce mega lorries which are 25.5 metres long and 60 tonnes in weight which are 50% longer and over a third heavier than the current maximum lorry weight of 44 tonnes. One of these vehicles (and this is the smallest in the planned range) is the weight of a Challenger Tank. These vehicles are simply far too big to operate on any of the UK roads, and the Secretary of State for Transport must not even allow trials of such LHV's on UK roads, let alone permit their use.

Mega Lorry on trial in Germany

Conclusion

We argue that opposition to the Lorry Park at Sellindge must be linked to a fundamental change in transport provision in Kent, offering the following.

- A proper second motorway (completion of the M2) with a Quick Movable Barrier built in
- A Quick Movable Barrier for the M20
- An alternative to the current Dartford Crossing
- A new deep sea terminal in Essex
- A developed high speed freight railway from Dover/Channel Tunnel with connections via Canvey to the east and north.
- Use of the connections that already exist for freight to run via Tonbridge and Redhill
- Reconnection of Dover Western Docks to rail – and a connection to the Eastern Docks
- A continuation and encouragement to the restructuring of rail freight charges through the Channel Tunnel
- The provision of a proper secure truck stop at Dover which is immigrant proof
- Prohibition of casual lorry parking in Kent as there should be no need for it
- A robust method of pursuing foreign operators through the Court system
- Encouragement for the development and funding of swap-body and other multi-modal solutions which make the transition to freight to and from rail efficient
- Changes to the planning rules to promote development which has integrated rail facilities with a guarantee of continued use.
- Penalties for installing a rail connection and then abandoning in favour of lorries.
- Guarantees that rail freight plays a major part in developing conurbations – such as Ashford and Thames Gateway.
- A planning moratorium on any proposed development adjacent to railway land (or former railway land if the line has been closed), unless a specific rail element forms part of that planning proposal.
- Encouragement to new schemes to carry double deck container trains on new track.

It has been shown that a 'park them and forget them' policy will, in a very few years, create far more road chaos than we have now. Creating a Park at 10a will effectively prevent Operation Stack being implemented between Jct 10 and 11, a huge part of the motorway. It would also cause untold problems at Jct 10 including the real risk of ambulances being blocked out of the William Harvey Hospital. There are grave concerns about public order and safety in a Park with 3,000 lorries in it.

The very latest figures (2006) from the Department of Transport show the increasing dominance of the Dover Strait Ports (including the Channel Tunnel) in carrying powered vehicles. Of UK registered vehicles 86% travelled via the Dover Strait. The corresponding figure for foreign vehicles was 87%. The steep upward graph curve continues unabated. Drastic action must be taken on a better foundations that a lorry park that can accommodate

a few hours-worth of lorries. The situation is already developing where roadwork on the M20 will become impossible. Kent would be instantly gridlocked.

The KCC proposal for the Lorry Park at Sellindge must be opposed because it will create its own very serious problems, and as the start of sustained pressure to get a long term strategic approach to transport between the UK and the near continent, not only in the M20 corridor but throughout Kent and the UK.

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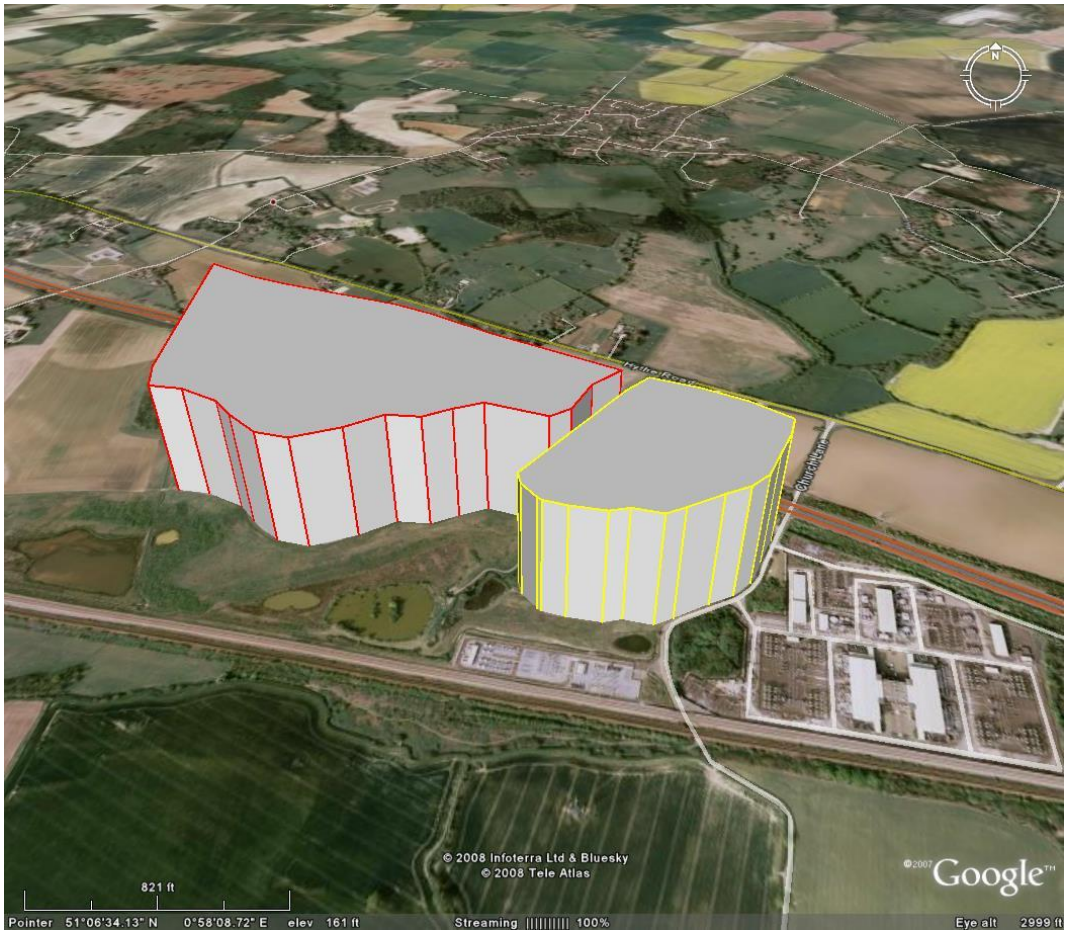
March 2008



3-D view of lorry park superimposed on a GoogleEarth image, looking north with the converter station to the right, adjacent to the railway. The permanent park for 500 lorries is marked in yellow; the 'Operation Park' extension for 2,500 lorries is marked in red.

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