



CPRE/4

Town and Country Planning Act 1990

**Appeal by Kent International Gateway Limited
APPU2235/A/09/2006565/NWF**

Kent International Gateway, Land West of Junction 8, M20, Maidstone, Kent

**Statement by Gareth Thomas on behalf of Protect Kent
(the Kent Branch of CPRE)**

TRANSPORTATION



Campaign to Protect
Rural England

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Registered office: Kent branch of the Campaign to Protect Rural England, 3 Evegat Park Barn, Station Road, Smeeth, Ashford, Kent TN25 6SX Fax: 01303 815189 Email: info@cprekent.org.uk

Phone: 01303 815180 www.cprekent.org.uk

A company limited by guarantee, registered in England number 4335730, registered charity number 1092012

1. I, Gareth Thomas, was chairman of CPRE Kent from 2003 to 2008 (5 year limit) and currently chair its transport specialist group. I have an MA honours degree in Mechanical Sciences from Cambridge University and am a member of the Institution of Mechanical Engineers. My experience has included five years as a member of a small team designing the cargo handling facility at Heathrow Airport, with particular responsibilities for handling systems, and later, as Corporate Engineering Manager for Bowater Scott Corporation, I was to some extent involved in the corporation distribution systems
2. The KIG proposal is essentially a freight handling and warehousing operation. It comprises three separate elements: a railhead, a freight consolidation and breakdown function, and large scale warehousing, together with the necessary infrastructure.
3. The railhead is forecast to receive some 12-13 long trains per day, made up of either box cars or container carriers. This seems particularly ambitious. The large majority of current rail freight is single product trains such as those carrying aggregates, oil, steel production and similar. These normally go direct from producer to user (or supply depot) and do not need to go via a road/rail interchange. The type of rail freight that will be handled via KIG generally will be made up of single or small numbers of loaded wagons or containers from manufacturers or suppliers, many requiring to be newly converted from using road transport. These wagons are notoriously difficult to assemble in to long single destination trains, usually via sundry shunting yards across the country. There is also an anticipation of several trains a day arriving via the Chanel Tunnel which have the same problem. We believe that the volume of potential rail traffic has been significantly overstated and do not see any evidence to the contrary.
4. The freight consolidation and breakdown function is needed to manage the way freight is handled. Taking freight off the trains, either directly to HGVs or more usually in to the warehouse is quite straightforward. Assembling loads on to railways (box cars or containers) which are all bound for the same initial rail destination is much more difficult. Again there will be a significant problem of matching the availability of freight to any given destination with train capacity, causing many trains to leave with empty wagons. Much of this outgoing freight will have been delivered by HGV.
5. The general warehousing function is undoubtedly intended to be the main part of the operation of this site. It appears to claim the potential to act as a National Distribution Centre (NDC), a Regional Distribution Centre (RDC) and as a local facility. Whether these claims are achievable is doubtful.
6. This is an unlikely place for an NDC, both from the incoming and outgoing aspects. An RDC is more likely. However both will create very large numbers of lorry movements over large distances. The effect on local roads has been examined by others, but there is no doubt that the majority of HGVs will use the M20 initially, mostly going westward toward the centres of population, particularly London. The original proposals calculated that KIG would add some 10,000 total trips per day to the current traffic levels, with the revised

submissions indicating a somewhat lower projection of some 9,000 total additional trips¹. The original submissions suggested that much of this onward traffic (some 6,000 per day) would travel on west of Jct 8 of the M20. A significant majority of that (we conservatively estimate some 4,000) will want to cross the Thames at the Dartford Crossing, already one of the most constantly congested points in the south of England. The rest may well add to traffic on the roads of south London, from Swanley onwards. It does seem to be completely misconceived to place this kind of facility in this location for both an NDC and an RDC. This calls into severe doubt the assertion that the traffic impact of KIG will be negligible, particularly in the light of inaccuracies in the presented data², and would wish to see a much more rigorous demonstration of its effects.

7. One of the key factors in any general freight handling operation is that the handler can not know either the origin or the destination of the freight passing through until it arrives, unless specific contracts are in place. In an operation as large as this is proposed to be, performance estimates can only be very generalised. The precision in many of the figures is spurious – e.g. 613 inbound and outbound train units for NDC, 610 units each way for RDC etc.
8. One of the features that periodically affects Kent's transport links are the occasional major delays which occur at the channel crossings due to adverse weather, industrial action, or other unforeseen events. When traffic is prevented from crossing through the Port of Dover or through the Channel Tunnel for any reason, queues rapidly build up and the situation is managed by Kent Police through the implementation of Operation Stack. In Phase 1 of Operation Stack, used when delays are not expected to be too severe, the coast-bound M20 is closed between Junctions 11 and 12 so that queues of coast-bound HGVs can be parked. Longer delays require Phase 2 to be implemented, which involves closing the motorway for the longer stretch from KIG's access junction (Jct 8 of the M20) to Jct 9 to accommodate parked HGVs, with the A20 providing an alternative route for all other traffic. Unsurprisingly this causes huge knock-on congestion over a wide area. We are concerned, therefore, that the applicants do not appear to consider this to be worthy of comment in their traffic assessments.
9. The employee numbers appear to be quoted either as 3500 or 3000. Maidstone town has only around 1500 job seekers, many of whom (at least half) will not be appropriate for the jobs at KIG. There will therefore bound to be both considerable poaching from other employers in the area and a large amount of commuting from further afield, such as the Medway Towns, Ashford, Sittingbourne, Canterbury etc. It is not really possible to predict the balance of employment from these areas, and we see no reason for it to be based on population densities alone. We understand that Maidstone Borough

¹ From Tables 5.3 and 5.6 of chapter 5 (Traffic and Access) of the Environmental Statement dated 2007 and chapter 5 of the Supplementary Environmental Statement dated 2009.

² Table 5.6 of the 2007 Environmental Statement 2007 indicates that the total AADT using the A20 east of site access will be 17861. The addition of the two values given in the table reaches a total 21328, which, when translated through to the calculation in table 5.7, gives a total vehicle increase at this point of 58%, rather than the 32% quoted.

Council and KIG have agreed on figures to represent the likely spread of employees. However the effects on traffic from employees will be widespread, and include the local roads all around Maidstone, including the B2163 south, the A20 both east and west, the A229, particularly where it enters the Medway Towns, through Hollingbourne up to Sittingbourne and many more single carriageway, often narrow, roads. The highway engineers' view of what traffic any road can take tend to be based on a maximum Average Annual Daily Total, and not on what is an acceptable maximum to local residents, nor what figures produce congestion at peak flows. Clearly the KIG induced traffic will reduce the quality of life for people over a very wide area.