



CPRE/8

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 on behalf of Protect Kent (the Kent Branch of CPRE)

CLIMATE CHANGE



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.

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1. Protect Kent is the Kent Branch of the Campaign to Protect Rural England (CPRE). CPRE is a national charity which promotes the beauty, tranquillity and diversity of rural England. We advocate positive solutions for the long-term future of the countryside. Founded in 1926, we have 60,000 supporters and a branch in every county. The Kent Branch was established in 1929.
2. CPRE Protect Kent acknowledges that there is a pressing imperative to limit carbon emissions from the logistics industry as from every other sector. However we have considerable doubts that the case for a net reduction in carbon emissions by KIG has been adequately made.
3. Our principal arguments with regard to this matter will be made once we have had sight of the applicant's case for carbon reduction. However, we consider that the claims for potential reduction in greenhouse gas emissions to be achieved by KIG are dubious. The embodied carbon associated with the construction of such a large facility puts it in an immediate carbon deficit to be set against any operational savings vs the current situation of through, non-stopping road freight at this location. The applicants need to provide a robust demonstration of the overall lifecycle carbon emissions associated with the site.
4. We consider that the energy and other requirements of moving, levelling and stabilising the ground at this site have been underestimated. In comparison with sites that do not feature Gault clay, we contend that this site will require drastically enhanced piling and stabilisation, with a concomitant increase in the embedded carbon of the necessary concrete.
5. The operational savings made year-on-year are likely to be marginal, even if the rail element were to be fully utilised (which is doubtful). Indeed the lack of viability for the rail freight element of the scheme means that it is far more likely to evolve into a road-road interchange. Besides adding to the carbon burden it will generate significant congestion in an area of the M20 corridor that is already highly congested and suffers from poor air quality. It will also mean the 'browning' of a greenfield site which is in agricultural production, which in a climate of increasing concern about food security is of questionable merit.
6. While rail freight clearly offers the potential to lower carbon emissions in comparison with road freight, it appears highly unlikely that KIG is in an appropriate location to achieve this. Indeed, it appears to be based on the assumption that current trade patterns can be sustained. The 80% reduction in carbon emissions set out in the Climate Change Act 2008 will require drastic steps to de-carbonise our economy. It is very doubtful that KIG can play a meaningful part in achieving this goal.