House of Commons
Transport Committee

Operation Stack

First Report of Session 2016–17
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Report, together with formal minutes relating to the report

Ordered by the House of Commons to be printed 23 May 2016
Transport Committee

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Summary

The road network connecting Dover and Folkestone to the rest of the UK is of both local and national importance. Most of the road freight entering or leaving the UK does so through the Port of Dover or the Channel Tunnel. When cross channel services are disrupted—by bad weather, operational difficulties, industrial action, or security concerns—long queues of large goods vehicles (LGVs) can quickly build up.

The Kent Police use Operation Stack when disruption is prolonged. This involves the closure of parts of the M20 in stages to provide a place to hold queues of LGVs with the aim of keeping as much of the north and south bound carriageways open as possible. When Operation Stack is used it causes significant costs and inconvenience for a large part of the UK economy and it has a number of local impacts with the community in south-east Kent bearing the brunt. Hauliers and businesses incur costs associated with delay and loss of goods (such as perishable loads), drivers are stopped for long periods on a motorway with poor facilities, and the disruption affects local communities and the local economy.

Operation Stack was deployed on 31 days in 2015. The total number of days on which Operation Stack was used in 2015 was not unprecedented, but the number of consecutive days was unusual. As a result the Government came under pressure to find a way of mitigating the negative effects of Operation Stack and an off-road lorry park became the centre-piece of its response. It leased Stone Hill Park (formerly Manston Airport) as a short-term solution while consulting on plans for a permanent lorry park. The Government has set aside £250million to build a permanent lorry park near junction 11 of the M20, capable of holding around 4000 LGVs. This will require an area of land equivalent in size to 90 football pitches (about the same size as Disneyland in California). It would be on a scale unprecedented in Europe and there appears to be only one lorry park in the world on a comparable scale. A project of this scale requires full and careful evaluation and it must be clearly demonstrated that all possible alternatives have also been properly evaluated.

The Government’s decision to proceed was taken hastily in reaction to the events of the summer of 2015. There are considerable risks involved in spending such large sums and the speed of doing so appears to have left some of the usual best practice behind it. The Government is right to seek a solution to the level of disruption caused by Operation Stack but should do more to show clearly that the proposed lorry park will deliver the benefits promised and address the concerns raised in our Report.

The Government has not demonstrated clearly enough what options have been evaluated. Upgrading the M20 and/or the A2/M2, increasing the capacity of cross-channel services, building a network of smaller lorry parks, using technology to manage a system of virtual queuing, and moving more freight from road to rail, could provide alternatives to a lorry park.
Before proceeding with this scheme the Government ought to demonstrate the necessity of building the lorry park. It should examine:

- the cost-benefit ratios of alternatives to the lorry park;
- whether the lorry park is a proportionate and appropriate solution to the scale and frequency of disruption associated with Operation Stack;
- the environmental and social costs that the lorry park will impose on the locality;
- the value of any benefits that the lorry park will bring locally and to the UK economy; and
- the long-term costs of operating, maintaining, renewing and, eventually, decommissioning the lorry park.

This proposal should not be looked at in isolation. The Government’s support for modal shift, improvements to rail freight, improvements to the existing road network, and a decision on the Lower Thames Crossing need to be considered alongside each other. The Government should take a view on how these different improvements to the UK’s strategic transport infrastructure will affect each other and how they can be taken forward in ways that will deliver the best outcomes for the economy and for local communities.
1 Introduction

1. Routes through Kent to Dover and Folkestone provide a vital link between the Channel Ports, London and the rest of the UK. The M20, the A2 / M2 route and the Dartford crossing—the only road crossing of the Thames Estuary east of London—are all critical parts of the country’s road network. Businesses, communities and individuals across the UK depend on these routes for goods and services. The routes also serve an important local function, enabling local businesses to operate effectively and making it possible for people in local communities to access education, housing, jobs, and leisure and retail facilities.

2. Eighty-eight per cent of powered goods vehicles travelling from Great Britain to mainland Europe use the Dover Strait Port Group, travelling by:

   - roll on / roll off (RORO) ferries departing from the Port of Dover for Calais; and
   - the Channel Tunnel vehicle shuttle service (“Le Shuttle”), a short-distance “rolling highway” between Folkestone (Cheriton) and Calais (Coquelles), run by Eurotunnel.

3. The M20 is the main freight corridor to the Channel Tunnel. It is also used by up to 70% of traffic heading for the Port of Dover (which then takes the A20 coastal route from Folkestone to Dover), because of the inferior standard of the more direct A2 / M2 route to Dover (the approach to the Port on the A2 has a number of sections that comprise a single carriageway). (The network of motorways and trunk roads in Kent is shown in Figure 1.) On average, some 10,800 road-freight vehicles cross the Strait of Dover each day (5,400 in each direction), around two-thirds of them travelling by ferry and one-third through the Tunnel.

4. Operation Stack is implemented when either of the cross-Channel services is severely disrupted, for reasons such as bad weather, operational problems, industrial action and demonstrations, and, in recent instances, migrant action at Calais (Coquelles).

5. It involves the emergency use of large stretches of the M20 motorway (in south-east Kent) to park freight traffic bound for the Channel Tunnel or the Port of Dover.

6. During the deployment of Operation Stack, Kent Police use powers under the Civil Contingencies Act 2004 to close affected sections of the M20 and direct coast-bound freight traffic to queue there. Deployment is overseen by a multi-agency Strategic Coordinating Group, which is apparently also referred to as “Operation Fennel” (and, not quite correctly, as “Gold Command”). This is usually chaired by a Kent Police representative.

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1 Department for Transport, Road goods vehicles travelling to mainland Europe: October to December 2015 (quarter 4), 18 February 2016
2 RORO ferries between Dover and Calais also carry non-freight vehicles and foot passengers.
3 Eurotunnel operates separate shuttle services for freight and non-freight vehicles. Foot-passenger and rail-freight services through the Tunnel are run by two other operators (Eurostar and DB Schenker respectively), who pay a toll to Eurotunnel.
4 Qq85, 87 [Paul Watkins]; Port of Dover (OPP 004), Kent County Council (OPP 021), Dover District Council (OPP 034)
5 Highways England, Managing freight vehicles through Kent: A Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford, December 2015, p 6; Q194; Eurotunnel (OPP 022), Port of Dover (OPP 053)
7. When Operation Stack is in place, freight is separated into two static queues on either side of the M20 carriageway—one for Eurotunnel traffic (on the inside lane) and one for Port of Dover traffic (on the outside lane). Space is left in the middle to allow access for emergency vehicles. Queues are released at the request of the Port of Dover and Eurotunnel, with vehicles being moved forward as required, according to the amount of capacity becoming available.

8. When the M20 is in use for Operation Stack, other traffic must be rerouted onto the local road network. This includes both local traffic and non-freight (largely tourist) traffic heading for the Port of Dover or Eurotunnel.

9. In the summer of 2015, as a result of severe and protracted disruption to both ferry services and the Channel Tunnel, Operation Stack was deployed on an unprecedented scale. In consequence, the local community in south-east Kent experienced a very significant level of disruption and inconvenience.

10. Following these events, we held an evidence session on 14 October 2015, at which we heard from a range of local and national stakeholders about the problems caused by Operation Stack and about possible alternative arrangements. We also received a small amount of correspondence on the subject.
11. On 22 October 2015 our Chair wrote to the Secretary of State for Transport, Rt Hon Patrick McLoughlin MP, asking him about the Government’s plans to conduct Operation Stack differently and to mitigate its effects in the meantime.7

12. The Secretary of State replied on 25 November 2015, telling us that work on a long-term solution to the issues posed by Operation Stack had “moved at pace”. He informed us of the Chancellor of the Exchequer’s announcement on that same day, in the Spending Review and Autumn Statement, that the Government was “providing up to £250 million for a major new permanent lorry park to increase resilience in Kent”. Mr McLoughlin further stated that the Government would “consult on a preferred site at Stanford [a village by Junction 11 of the M20] and other alternatives shortly”.8 On 11 December 2015 Highways England (the body responsible for the M20)9 began a public consultation (which ran until 26 January 2016) concerning plans for the lorry park.10

13. On 19 January 2016 we announced the reopening of our inquiry into Operation Stack, in order to consider these new developments, and issued a call for written evidence. We emphasised that the inquiry would not consider proposals for specific sites for the permanent lorry park, as this was a planning issue and currently being considered in the consultation by Highways England.11

14. In an evidence session on 21 March 2016 we heard arguments for and against the planned lorry park from a range of local and national stakeholders. In a further session, on 11 April 2016, we took evidence from the Parliamentary Under Secretary of State at the Department for Transport (DfT) with responsibility for freight and logistics, national roads and Highways England, Andrew Jones MP; a senior official at the Department; and the Chief Executive of Highways England. In addition, we received 56 written evidence submissions. We are grateful to our witnesses and to all those who took the trouble to write to us.

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7 Transport Committee, Correspondence between the Transport Committee and Secretary of State regarding Operation Stack, October–November 2015
8 Transport Committee, Correspondence between the Transport Committee and Secretary of State regarding Operation Stack, October–November 2015
9 Highways England has operated as a government-owned company since 1 April 2015. It was previously, from 1994, constituted as a government executive agency, called the Highways Agency. It is the statutory Highway Authority responsible for the core road network (motorways and trunk roads) in England. Non-trunk highways in Kent are the responsibility of Kent County Council, as the upper-tier local authority.
10 Highways England, Managing freight vehicles through Kent: A Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford, December 2015
11 Transport Committee, Operation Stack inquiry launched, 19 January 2016
2 Background

Brief history of Operation Stack

15. Operation Stack was first deployed in 1988 (during industrial action on the UK side of the English Channel)\textsuperscript{12} and has been in use at varying intervals ever since. Over time, complex and extensive iterations of Operation Stack have been developed—latterly including the use of the London-bound carriageway of the M20, once closed sections of the coast-bound carriageway are full.

16. In 2005 a coned contraflow element to Operation Stack (to allow other traffic to continue using the M20) was trialled, but the time required for set-up and removal made it impractical.\textsuperscript{13} In 2008 the Highways Agency leased a Quick (or Quick-change) Moveable Barrier system for use in setting up a mobile concrete contraflow barrier during Operation Stack. However, the device (bespoke machinery which was leased at a cost of £627,849 a year) was used only twice in the following four years and its lease was ended in April 2012, apparently on the grounds that it was not cost-effective.\textsuperscript{14}

17. Despite the development of plans for the implementation of Operation Stack on an extensive scale, in practice it has mostly been deployed only for short periods using limited capacity. (The longer the time that Operation Stack is deployed, the greater the capacity required, due to the lengthening of the queue.) The DfT stated in evidence to us that Operation Stack has been deployed “typically for a few days a year and only for a few days at a time and accommodating up to about 2,000 lorries”.\textsuperscript{15} Kent County Council (KCC), meanwhile, told us that Operation Stack had been “implemented 48 times between 1997 and January 2015 with an average duration of 5–6 days a year”\textsuperscript{16}; it has been called on average “more than twice every year”.\textsuperscript{17}

18. There have been rare occasions when Operation Stack has been deployed more extensively, as shown by analysis of data that was supplied to us by Highways England (see Figure 2). As can be seen, 2015 saw a significant spike in the deployment of Operation Stack. Reasons for the deployment of Operation Stack in peak years are set out in Table 1.

\begin{itemize}
\item \textsuperscript{12} Qq 183, 225; KentOnline, “Operation Stack: How a seamen’s strike led to the introduction of the M20 ‘lorry park’”, 22 January 2015
\item \textsuperscript{13} BBC News, “Changes to Operation Stack system”, 24 March 2005
\item \textsuperscript{14} Q141; Kent County Council, Growth without gridlock: A transport delivery plan for Kent, December 2010; Traffic Technology Today, Highways Agency to remove the Quickchange Moveable Barrier from M20, 3 April 2012; BBC News, “M20 barrier branded ‘expensive failure’ by Kent MP”, 5 April 2012
\item \textsuperscript{15} Department for Transport (OPP 019)
\item \textsuperscript{16} Kent County Council (OPP 055)
\item \textsuperscript{17} Q47
\end{itemize}
- The annual totals have been arrived at by counting the total number of dates in each month when Operation Stack was in operation and then combining the monthly totals for each year.

- There are other ways of arriving at annual totals, which produce slightly different figures. However, the trends remain the same regardless of which methodology is used.

Source: Highways England

### Table 1: Reasons for the deployment of Operation Stack in peak years

<table>
<thead>
<tr>
<th>Year</th>
<th>Days</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>25</td>
<td>Industrial action and demonstrations in Calais (port, ferries and Eurotunnel)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Congestion at Port of Dover and Eurotunnel</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Technical problems at Eurotunnel</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Adverse weather</td>
</tr>
<tr>
<td>2005</td>
<td>27</td>
<td>Adverse weather</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Industrial action and demonstrations in Calais (port and ferries and Eurotunnel)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Berth damage at Port of Calais</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Technical problems at Eurotunnel</td>
</tr>
<tr>
<td>2008</td>
<td>39</td>
<td>Adverse weather</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Industrial action and demonstrations in Calais (port and ferries)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Fire at Eurotunnel</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Congestion at Port of Dover and Eurotunnel</td>
</tr>
<tr>
<td>2015</td>
<td>31</td>
<td>Fire at Eurotunnel</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Industrial action and demonstrations in Calais (port, ferries and Eurotunnel)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Migrant action in Calais (Eurotunnel)</td>
</tr>
</tbody>
</table>

Sources: Kent County Council (2000); media reports (2005 and 2015); Kent Police (2008)
Operation Stack in summer 2015

19. The summer of 2015 saw prolonged industrial action by French ferry staff, who were protesting at the consequences of restructuring cross-Channel ferry operators following a ruling of the UK Competition and Markets Authority.\(^\text{18}\) At the same time, sustained attempts by migrants to breach security provisions at Eurotunnel in Calais (Coquelles), in order to come illicitly to the UK, led repeatedly to the disruption of services.

20. This unprecedented combination of circumstances meant that Operation Stack was deployed almost continuously between 23 June and 1 August 2015—on seven occasions for a total of 26 days.\(^\text{19}\) The constant deployment of Operation Stack in this way had not previously been seen—not even in previous peak years of deployment. The consequence was that large numbers of vehicles built up in the queue, necessitating the use for the first time of the London-bound carriageway, with the implementation of Stage Three of the then current iteration of Operation Stack (see Table 2), on two occasions, for a total of four days.\(^\text{20}\) At the peak, 7,000 Heavy Goods Vehicles (HGVs) were queued on the M20, taking 36 hours to work their way through.\(^\text{21}\) This disruption had significant national and local consequences.

Table 2: Operation Stack from spring 2015 to 4 August 2015

<table>
<thead>
<tr>
<th>Stage</th>
<th>Extent</th>
<th>Vehicle capacity</th>
<th>Total vehicle capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>One</td>
<td>Junction 8 (Leeds Castle) to Junction 9 (Ashford West), M20 coast-bound carriageway—two lanes</td>
<td>2,100</td>
<td>2,100</td>
</tr>
<tr>
<td>Two</td>
<td>Junction 9 (Ashford West) to Junction 11 (Hythe), M20 coast-bound carriageway</td>
<td>1,500</td>
<td>3,600</td>
</tr>
<tr>
<td>Three</td>
<td>Junction 9 (Ashford West) to Junction 8 (Leeds Castle), M20 London-bound carriageway</td>
<td>2,100</td>
<td>5,700</td>
</tr>
<tr>
<td>Four</td>
<td>Junction 11 (Hythe) to Junction 9 (Ashford West), M20 London-bound carriageway*</td>
<td>1,500</td>
<td>7,200</td>
</tr>
</tbody>
</table>

* Stage Four was never implemented.

Source: Highways England

21. Natalie Chapman, of the Freight Transport Association (FTA), told us about the impact on the haulage industry of the sustained deployment of Operation Stack in 2015:

At its worst, vehicles were queueing for over 24 hours, so there were some products that did not make it to market because they went off in the queue. There were others that arrived so late that there were late penalties. There were particular issues around things like express courier deliveries that are very time-sensitive. Again, they did not make it to market in time.\(^\text{22}\)

\(^{18}\) Eurotunnel’s ownership of ferries leased to a cross-Channel operator was held to be contrary to competition rules.

\(^{19}\) Department for Transport (OPP 063)

\(^{20}\) Qq178, 203 [Jon Griffiths], 204

\(^{21}\) Kent County Council (OPP 055); Qq2, 5, 51

\(^{22}\) Q2
22. We were, though, told by the Chief Executive of Highways England, Jim O’Sullivan, that the average delay, even with Operation Stack “at its worst”, had been “about four to six hours; in the way it worked out last summer, an individual truck was only held for that period of time”.

**Short-term measures introduced in 2015**

**Leasing of the former Manston Airport site**

23. From 4 August 2015 arrangements for Operation Stack were amended to include the use of the former Manston Airport site (now known as “Stone Hill Park”), in the district of Thanet, as an interim lorry park for Dover-bound traffic. These vehicles would be “drained” from the queue on the M20 carriageway, “leaving only Eurotunnel HGVs on the M20”. Separating Port traffic from Tunnel traffic in this way would avoid the deployment of Stages Three and Four of Operation Stack, meaning that the London-bound carriageway could continue to take traffic (see Table 3 and Figure 3).

**Table 3: Operation Stack from 4 August 2015 (not yet implemented)**

<table>
<thead>
<tr>
<th>Stage</th>
<th>Extent</th>
<th>Vehicle capacity</th>
<th>Total vehicle capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>One</td>
<td>Junction 8 (Leeds Castle) to Junction 9 (Ashford West), M20 coast-bound carriageway</td>
<td>2,100</td>
<td>2,100</td>
</tr>
<tr>
<td>Two</td>
<td>Junction 9 (Ashford West) to Junction 11 (Hythe), M20 coast-bound carriageway</td>
<td>1,500</td>
<td>3,600</td>
</tr>
<tr>
<td>Three</td>
<td>Stone Hill Park (Manston)</td>
<td>3,500 to 4,000*</td>
<td>7,100 to 7,600*</td>
</tr>
</tbody>
</table>

* Operational capacity of Manston depends on traffic conditions and may be less than the maximum parking capacity of the site.

Source: Highways England

24. This was facilitated by a lease agreed with the owners of Manston by the DfT. The arrangement was initially to be for three months but was subsequently extended until June 2016. A Statutory Instrument granting temporary planning permission for nine months was passed on 1 September 2015. In addition, the statutory powers of Highways England’s Traffic Officers have apparently been extended to allow them to direct traffic to the site (since there are no statutory powers that would allow Kent Police to direct a particular class of traffic onto private land in this way).

25. David Brewer, Network Delivery and Development Director for Highways England, said that the members of the Strategic Coordinating Group had agreed that Manston “was the best available solution”. We detected little enthusiasm for the Manston option,
though. Ms Chapman, of the FTA, told us that: “Manston is only a short-term measure—very short term, we hope. It is far from ideal. I suppose it is the best of a bad bunch of options”.\(^\text{30}\)

**Figure 3: Manston diversion route**

As Operation Stack fills, freight traffic heading to the Port of Dover will be diverted to Manston Airfield, before being sent onto the port.

**Feasibility of using Manston**

26. When we asked Paul Watkins, the Leader of Dover District Council, about the likely effect of rerouting traffic from Manston to Dover, he told us the impact on traffic would be “horrendous”. He referred to the lack of dualling along stretches of the A256 (which connects Thanet and Dover) and the “log-jam” that would occur. Mr Watkins also thought there were “policing issues”, such as preventing “rat-running through the local villages”.\(^\text{31}\)

27. Kent Police themselves have also expressed concerns about the plan to use Manston. Information released in response to a Freedom of Information request shows that on 9 July 2015 the Chief Constable of Kent, Alan Pughsley, texted the Leader of KCC, Paul Carter, to say regarding the possible use of Manston that “the challenging logistics of this venue would probably make it a non-starter unfortunately”.\(^\text{32}\) Shortly afterwards, on 14 July 2015, Mr Pughsley told the Home Affairs Committee that if Manston were used:

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\(^{30}\) Q26

\(^{31}\) Q85

\(^{32}\) WhatDoTheyKnow, *Kent Police and Operation Stack*, 21 September 2015
My team would say, “We cannot logistically do that because you would have to escort the lorries from the M20 all the way over to [ … ] Manston Airport”. If the Highways Agency or Highways England decided they could escort that there may be another conversation around that.  

28. A letter from the Chief Constable to the Leader of KCC, dated 30 July 2015 (also later released in response to a Freedom of Information request), identified the following drawbacks to using Manston:

- The current road network is not sufficient to deal with the increase in freight traffic via the A28 / A253 or A256;
- Stone Hill Park is approximately 23 miles from the nearest A2 junction and the A256 is single carriageway, via rural villages, and not suitable for heavy HGV use;
- The proposal is likely to compound congestion in rural villages from the A2 to the site;
- The site is not strategically placed for access to either the Port of Dover or the Channel Tunnel;
- The current facilities at the site are unsuitable for large scale parking of freight e.g. insufficient hard-standing (currently will only hold approximately 450 pieces of freight as opposed to the 2,100 held between junctions 8–9 of the M20 alone) and toilets / wash facilities [ … ]

The Chief Constable concluded that: “These points indicate that Stone Hill Park would not be a viable solution, but the decision to progress any further work would sit with Highways England as the primary agency.”  

29. Just four days later, on 4 August 2015, the DfT and Highways England announced that Manston would be used and quoted the Deputy Chief Constable of Kent, Paul Brandon, as follows:

“Following work by the Department for Transport and Highways England, the option to divert freight bound for Europe to Manston Airfield, whilst very challenging, has become more feasible in terms of resourcing and logistics. Working with more resources than ever, including mutual aid from other police forces, Highways England and other agencies we are all committed to making the plan from the Department for Transport work [ … ]”  

30. When we asked Assistant Chief Constable Jo Shiner in October 2015 about Mr Pughsley’s comments to the Home Affairs Committee, she told us:

The Manston option has not been tested; it cannot be tested until the criteria are there. It is quite a serious step to actually invoke the Civil Contingencies Act, with all the risks around doing that. It cannot be fully stress-tested until

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33 Oral evidence taken before the Home Affairs Committee on 14 July 2015, HC (2014–15) 318, Q14
34 WhatDoTheyKnow, Kent Police and Operation Stack, 21 September 2015; KentOnline, “Kent chief constable casts doubt on whether using Manston as emergency lorry park will work”, 1 October 2015
35 Department for Transport, Highways England and Lord Ahmad of Wimbledon, New measures to relieve pressure on Operation Stack, 4 August 2015
those conditions are there. Yes, we do have concerns, which we have articulated throughout, about the Manston option. Having said that [...] it is the best of a number of bad options, to be frank.\textsuperscript{36}

31. At the same hearing, Mr Brewer, of Highways England, told us:

We agreed the diversion routes to and from Manston. We worked with Kent County Council to understand how we would direct traffic to and from, and we worked with the police and others to figure out how we would manage that operation.\textsuperscript{37}

Mr Carter, of KCC, told us:

I am not as pessimistic about the Manston solution as others. I genuinely believe it will be good to see it tried and tested. If additional policing is put in through reciprocal arrangements with Essex Police, and there is a real will to keep the M20 and the Queen’s highway open in both directions, I believe that that is doable.\textsuperscript{38}

32. When we heard from Mr O’Sullivan, of Highways England, in April 2016, he was adamant that all appropriate preparations had been made:

Last year, we checked all the routes to and from Manston. We carried out truck manoeuvring on Manston. We tested the queueing and the marshalling of trucks within the arrangements that we had put in place. We put the signage up. We tested the routes between Manston using our own HGV vehicles—impact protection vehicles and the like; we did testing with those vehicles to make sure that the routes were suitable for large vehicles and that they could see traffic signals and signs [...] By the time we entered September, the thing had been rigorously and thoroughly tested for its suitability.\textsuperscript{39}

33. When we asked the Minister, at the same evidence session, about the Chief Constable’s comments to the Home Affairs Committee, Mr Jones stated that the police had not questioned the arrangements regarding Manston since the signing of the deal.\textsuperscript{40} In subsequent correspondence, he told us that a “new operational protocol” had been “agreed by a multi-agency group including Kent Police, Kent County Council, Highways England and Department for Transport officials on 6 August 2015”; it had also been agreed on the same day by the Kent Strategic Coordinating Group. However, this document could not be made public, “given its security sensitive contents”.\textsuperscript{41}

**Cost of using Manston**

34. Another point of contention regarding the use of Manston is how much it will cost. On 4 August 2015 a Freedom of Information request was submitted to the DfT, asking about the cost of the Manston lease, as well as the cost of additional signage, policing and other arrangements in connection with using Manston as part of Operation Stack. In its
response, dated 3 September 2015, the Department cited an exemption under section 43 of the Freedom of Information Act 2000 (that the release of the information would prejudice the commercial interests of any person) in respect of the cost of the lease. Regarding the second question, the Department responded that it “does not hold any information relating to the additional costs of policing and signage in relation to the use of Manston within Operation Stack”.

35. When our Chair wrote to the Secretary of State in October 2015, she made a point of asking for detailed information on the Manston deal, in order to allow us “to take a fully informed view on whether this arrangement represents value for money”. However, Mr McLoughlin stated in his reply that the cost “cannot be disclosed to the public at this stage as this is commercially sensitive information”.

36. We had no more success when we asked the junior minister responsible, Mr Jones, about this in April 2016. He told us that it would not be appropriate to talk about cost details, as the DfT was looking to further extend the lease on Manston and that “further negotiations are potentially compromised if we do them in public”. (The Minister and Mr O’Sullivan indicated that Manston would continue to be maintained as a “back-up” facility for Operation Stack, pending the completion of the lorry park.) The Minister did, though, hold out the possibility of releasing some information, in the interests of transparency, once any new deal had been concluded.

37. It has since been reported, although not confirmed, that the lease is to be extended to the end of 2017.

**Other short-term measures**

38. On 4 August 2015 the DfT announced that a filter system for “quick-to-market” goods would be trialled in the event that Operation Stack was again deployed. Under this scheme, hauliers producing a CMR note detailing that they were carrying various kinds of urgent, hazardous or perishable freight would not enter Operation Stack on the M20 or at Manston, but would instead be routed directly to the Port of Dover or the Channel Tunnel. The FTA anticipated that no more than 200 lorries per day would be given priority under this provision.

39. In addition, from 30 July 2015 until 28 August 2015 the DfT applied a temporary relaxation of rules governing drivers’ hours in the event that Operation Stack was necessary.
40. We heard that consideration had also been given to the reintroduction of a contraflow element to Operation Stack, but that this had been ruled out. Mr Brewer, of Highways England, told us it had been concluded that neither of the available options (the use of cones and the setting up of a fixed barrier) was practical or safe.52

The off-road solution: a permanent lorry park

41. The events of 2015 gave new impetus to the idea of building an off-road lorry park as a permanent solution to the problems posed by Operation Stack. This had been in circulation for some time and certain stakeholders, notably KCC, had long been indicating their support for it.

42. The Cabinet’s Civil Contingencies Committee (often referred to as “COBR”)53 requested that a preferred solution to the problems caused by Operation Stack be brought to its meeting on 21 August 2015. Highways England and KCC commissioned further work for this purpose from the European Gateway Strategic Delivery Group—a multi-agency taskforce that had been set up earlier in the year to develop short-term solutions to freight congestion around Dover and long-term changes to Operation Stack.

43. On the basis of further work by the Group, an “optimum package of measures” (with a preliminary costing of £468 million) was presented to COBR. The package included the construction of a lorry park capable of accommodating approximately 4,000 HGVs in a location close to the M20—although no specific site was mentioned.54

44. By October 2015, Highways England was “leading on the land acquisition, planning and delivery of a Lorry Holding Area with Permitted Development rights as the Highway Authority under Section 115 of the Highways Act 1980”.55 This statute allows Highways England to build a “lorry area” without the obligation to follow any of the normal planning procedures that would otherwise apply.56

45. When we held our evidence session in October 2015, we heard a number of arguments in favour of building an off-road lorry park as the best solution to the problems caused by Operation Stack.

Arguments for a lorry park

Keeping the M20 open

46. There are clearly serious consequences for the local community and the local economy when the M20 is closed; major inconvenience and cost are caused to individuals, public bodies and private businesses. A particular burden is borne by the A20, which becomes heavily congested with traffic diverted from the M20. Delays to freight traffic also have implications for the economy as a whole.

52 Q59
53 “COBR” (or “COBRA”) is an acronym for the Cabinet Office Briefing Rooms, where the Civil Contingencies Committee meets.
54 Paper for KCC Environment and Transport Cabinet Committee, “Solutions to Operation Stack: Freight Fluidity for the UK’s Gateway to Europe”, 16 September 2015
55 Kent County Council (OPP 055)
56 Highways Act 1980, section 115
Jennifer Hollingsbee, Deputy Leader and Cabinet Member for Communities at Shepway District Council, told us of the impact on her village of Sellindge, through which the A20 passes:

> Children cannot get into the primary school [... ] People cannot get to the doctor’s surgery [...] I cannot get out of my road on to the A20. There is a snarl-up the whole time. People want to go to the toilet. Even residents along the road, because cars have stopped waiting for the traffic lights to change, have been out and allowed people to go in and use their facilities [...] Local schools have coach trips for students. Some of them have not been able to go. Westenhanger Castle is very near junction 11. It had to cancel a number of weddings. The person who actually owns Westenhanger Castle was in tears and the bride was in tears because people were not able to get there. In Shepway as a whole, 15,000 people a day travel out of Shepway. They are held up by Operation Stack. They cannot get to their offices. Some of the shops are not able to open. We have 11,000 people coming into Shepway and it is the same kind of thing. The movement of traffic is absolutely gridlocked.

As well as the immediate financial costs to the local community (which are discussed further below), we heard there is also “collateral damage to Kent’s brand as the ‘Garden of England’”, discouraging tourists from visiting; and a deterring of inward investment, due to the “negative image” of the county that is conveyed.

There was widespread agreement in the evidence we received that it is unacceptable for the M20, which is “a key part of our strategic road network”, to be completely closed for any length of time.

**Driver welfare**

Ms Chapman, of the FTA, explained that an important reason for favouring an off-road form of Operation Stack was the need to provide better facilities for drivers. She told us that in Operation Stack at present: “There are some portaloos along the roadside but there is not a lot in the way of facilities.”

KCC told us:

> Drivers are stuck in their vehicles for many hours without heating or cooling, food and water, and toilet and washing facilities; therefore during Operation Stack emergency temporary welfare facilities are provided by KCC at a cost to the taxpayer.

Mr Carter said:

> When you have lorry drivers held by the side of a road for 36 hours, it is unacceptable. You have to have the 4,000 spaces where you can provide the proper and appropriate facilities to support that number of drivers who are held up for that length of time. Four or five hours sitting on the hard shoulder of a motorway is acceptable, with the toilets we have put in and this, that and...
the other, but any longer than that and you have to have a movement and flow rate to allow people to progress off the carriageway into the lorry park where they can have the appropriate facilities […] 62

51. Another consideration related to drivers’ welfare is the need to allow them to take proper rest breaks, which Operation Stack currently tends not to do. Ms Chapman told us:

Most of the time while the vehicles are in Stack they are stationary, but of course it is a queue and the queue does move forward. That is part of the problem for drivers in the queue, because it causes havoc with the drivers’ hours rules. They are probably not stationary long enough to take their statutory breaks […] 63

An “off-carriageway solution” would “allow them to sit for long enough to take their breaks so that they are not constantly moving forward”.64

**Maintaining freight fluidity**

52. Another argument that we heard in favour of an off-road solution concerned the necessity of maintaining the fluidity of freight traffic—so that when cross-Channel services do resume, the available capacity can be filled quickly and efficiently.65 Peter Cullum, of the Road Haulage Association (RHA), told us:

One of the key factors is that you must be close to the ports to be able to call them forward. The major inefficiency is if the carriers across the channel are not full. Therefore they have to be accessible to that. Ideally, they have to be off-road.66

Ms Chapman told us:

The worst crime during Operation Stack is to see trains or ferries leaving half empty. We need to make sure that they are full to capacity, so that we can release those vehicles, get them going and keep the supply chain running.67

53. Tim Waggott, Chief Executive of the Port of Dover, stated that ferries operating out of the Port of Dover have an “uplift capacity of 300 [lorries] an hour”. Accordingly, in order to operate at maximum efficiency, the Port needed vehicles to be released from any queueing arrangement at that rate.68

**Government funding commitment**

54. In our Chair’s letter to the Secretary of State in October 2015 she informed him we had heard in evidence that:

there was a consensus that an off-road lorry park offers the best solution, as this would potentially eliminate the need to close parts of the M20 and would

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62 Q51
63 Q6
64 Q11. See also Q13 [Peter Cullum].
65 Qq11, 13 [Peter Cullum], 26 [Peter Cullum], 33 [Natalie Chapman], 39, 51, 85, 184
66 Q13
67 Q33
68 Q33. See also Q85. This equates to the Port’s peak capacity of “between 60 and 70 sailings a day, all of which uplift 100 freight vehicles” – Q17.
Operation Stack

improve the situation for local communities […] As this solution has been recommended from numerous quarters, and any solution that keeps the M20 open would be of national benefit, I would like you to make clear what the Government intends to commit to the development of an off-road solution, how quickly you expect one to be put in place, and what other steps your Department might take to mitigate the effects of Operation Stack until an off-road solution can be put in place.69

55. In November 2015 came the Government’s announcement that it was committed to “providing up to £250 million for a major new permanent lorry park to increase resilience in Kent, by taking pressure off the roads in the event of Operation Stack” and would “consult on a preferred site at Stanford and other alternatives shortly”.70 The Chancellor of the Exchequer indicated that this decision had been taken following representations made to him by Kent MPs.71

Highways England consultation, 2015–16

56. The consultation undertaken by Highways England during December 2015 and January 2016 (which was non-statutory in character) sought views on which of two locations at Stanford should be used for the planned lorry park; and how exactly the lorry park should be used. The consultation envisaged a number of different ways of using the lorry park:

- **Alternative 1: Emergency Use**
  
  Use only as a holding area (with basic driver welfare facilities) to accommodate lorries in lieu of deploying Operation Stack on the M20.

- **Alternative 2: General Disruption**
  
  Use as above—and also to alleviate queues developing at the freight terminals at other times.

- **Alternative 3: General Disruption + Overnight Parking**
  
  Use as above—and also to provide basic overnight parking facilities (for a fee) during times of normal operation of cross-Channel services.

- **Alternative 4: General Disruption + Truckstop**
  
  Use as above—and also to provide truckstop facilities (a motorway service area focussed on providing facilities for lorries) during times of normal operation of cross-Channel services (with parking charges levied after the first two hours).

57. In correspondence from November 2015, which has been forwarded to us by the recipient, Highways England states that “Our study of other sites suggests an area of about 65 hectares will be needed.”72 In December 2015, in its consultation document, Highways

69 Transport Committee, Correspondence between the Transport Committee and Secretary of State regarding Operation Stack, October–November 2015
70 HM Treasury, Spending Review and Autumn Statement 2015, Cm 9162, November 2015, para 1.269
71 HC Deb, 25 November 2015, cols 1366 and 1391–2 [Commons Chamber]. See also HC Deb, 27 October 2015, col 192 [Commons Chamber]
72 Letter from Highways England, 30 November 2015
England referred to the need for the lorry park to cover an area equivalent to the Manston site (61 hectares), in order to accommodate the same number of vehicles envisaged for Manston (3,600 to 4,000).\footnote{Highways England, \textit{Managing freight vehicles through Kent: A Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford}, December 2015, p 9}

**Construction timetable**

58. We heard from the Minister that, in keeping with the DfT’s desire to proceed “at pace”, the lorry park would be built “as quickly as possible”. Mr O’Sullivan added that Highways England:

> would very much like to enter summer 2017 with some part of this scheme available […] \[W\]e would like to have it available for 500, 1,000 or 1,500 trucks—whatever we could manage next summer—and then finish it as quickly as the construction will allow.\footnote{Q222}

59. This, of course, entails a quick decision by the Minister on where to build the lorry park and how exactly it will be used, based on Highways England’s recommendations following the public consultation. Mr Jones told us that he would be making his decision with the involvement of the Secretary of State, as well as local councils and others in Kent.\footnote{Q224}
3 Costs and benefits of the lorry park

60. In oral evidence, Highways England and the DfT told us that a conventional cost-benefit analysis could not be undertaken in respect of the lorry park. Mr O’Sullivan, of Highways England, stated that he could not give a benefit-cost ratio for the lorry park and alternatives to it “because this is a very complex problem. We have done some cost-benefit work but the benefits are hard to quantify”.\footnote{Q188}

61. The Minister added that:

> Obviously, value for money is critical in all public expenditure, but it is very hard to quantify in this particular case because we do not know how often the asset will be needed […] Who knows how often the disruption may take place in the future? […] There is a further point which again is hard to quantify. The news that was coming out of Kent and out of the UK was that it was hard to travel around and do business. It is very difficult to quantify the impact of that in terms of potential lost opportunity. Yes, value matters, but a standard cost-benefit ratio for a road scheme is not that easy to deliver here.\footnote{Q188. See also Q207 [Andrew Jones].}

62. The Minister subsequently told us in writing that: “There is a strategic need to build a lorry park but we are at too early a stage for robust analysis.” However, “selection of the preferred scheme will use value for money criteria as part of a 5 part Business Case as stipulated in [the] Treasury Green Book for appraisal of proposals before committing funds to a policy, programme or project.”\footnote{The Green Book includes the Gateway Review Process, developed by the former Office of Government Commerce; and the Five Case Model Methodology. The latter involves setting out the strategic, economic, commercial, financial and management cases for a proposal, through the development, in succession, of a Strategic Outline Case, an Outline Business Case and a Full Business Case—before any expenditure is undertaken – HM Treasury, \textit{The Green Book: appraisal and evaluation in central government}, 20 October 2015.} At the same time, he emphasised that “the benefit cost analysis is more difficult than a more traditional road scheme given the unique circumstances of Operation Stack”. And he reiterated “that this government is very keen to ensure that the permanent lorry park is progressed as soon as possible.”\footnote{Department for Transport (OPP 063)}

63. Despite the difficulty of carrying out a cost-benefit analysis, there is, as we heard, information available from various sources about quantified costs and benefits which might be taken into account in any such analysis.

Frequency and duration of Operation Stack

64. As we have noted, over the past couple of decades, Operation Stack has mostly occurred infrequently for short periods—on average for just a few days a year. And there have been a few rare occasions when it has been deployed for longer periods and on a larger scale (as in the summer of 2015). Data supplied to us by Highways England further indicate that since 2008 Operation Stack has been deployed with diminishing frequency and intensity (see Figure 2), apart from the highly exceptional year of 2015.

65. Mr Brewer, of Highways England, told us that investment in traffic-flow monitoring had brought about “a situation where at the margins we will need to call Stack slightly
less often because, with better information, you can be a bit less conservative about the prediction of when it is going to be needed”. We also heard about Dover TAP, which has been in place since April 2015 and allows up to 500 freight vehicles to be held on the A20 approach to Dover. This has created a queueing “buffer” which may have some impact on how soon Operation Stack is triggered in the event of disruption (once Operation Stack is in place, Dover TAP is not deployed).

66. There were also those who were keen to tell us how highly unprecedented and unusual the events of the summer of 2015 had been, combining as they did the loss of a ferry operator, prolonged industrial action and demonstrations, and concerted migrant action at Eurotunnel. John Keefe, Director of Public Affairs for Eurotunnel, told us that there had been “a very unusual set of events”:

   a strike, a port blockade and ferries being taken out of service, combined with a migrant crisis that grew up in the summer months. Those circumstances have never existed previously, and they are highly unlikely to exist again in the same way.

67. Basing the decision to build the lorry park on such a set of circumstances, which are unlikely to be repeated, was described to us many times as a “knee-jerk” reaction. It was pointed out to us that the lorry park would be much bigger than is required for the volume of traffic that has needed to be queued in typical Operation Stack deployments.

68. The Minister himself indicated that the events of the summer of 2015 were “unprecedented”, having resulted from a highly exceptional “perfect storm”. However, he insisted that the lorry park plan was “not a knee-jerk response” to this. Rather, it was a rational response to the circumstances, particularly the predicted large-scale growth in the volume of freight traffic passing through the Port and Eurotunnel. (It is forecast that cross-Channel freight traffic levels will be 30% to 50% higher a decade from now, and will double within 20 years.).

69. Mr Cullum, of the RHA, told us that “The recession [after 2008] reduced the incidence of Stack and reduced its severity”, but the events of 2015 had shown that, with recent growth in traffic, Operation Stack could now quickly become necessary in the event of cross-Channel disruption. The projected growth in freight traffic would further exacerbate this. Mr Balfour, of KCC, referring to the events of summer 2015, told us that: “There is no way in which anybody can say that it will not happen again. Growth in traffic is increasing at an exponential rate.”
Immediate costs of Operation Stack

Cost estimates

70. Data on the costs immediately associated with Operation Stack are available in relation to a number of affected parties. Assistant Chief Constable Shiner told us that during the summer of 2015 Operation Stack had cost Kent Police £1.3 million. Given that Operation Stack was then in place for 28 days, this represents a daily cost of some £50,000. KCC said in evidence to us that it had “incurred direct costs in June to August [2015] for the provision of food, water, wash kits, blankets and additional emergency planning staff of £47,378”, amounting to a daily rate of £1,700.

71. In addition, costs are incurred by other public bodies, as shown in the report of the European Gateway Strategic Delivery Group which was published in July 2015. This indicates that during two of the Operation Stack events in the summer of 2015: Kent Fire and Rescue Service had daily costs of more than £5,000; Highways England spent over £13,000 per day; and there were costs to the NHS in Kent of over £9,000 per day. (This document also shows costs for Kent Police of over £68,000 per day; and KCC of over £8,000 per day.)

72. The FTA told us that they had estimated the cost to UK freight companies (whose vehicles make up around 15% of those caught in Operation Stack, the remainder being foreign-registered lorries) at around £750,000 per day.

73. A very substantial immediate impact of Operation Stack is that on the local economy of Kent and Medway. KCC told us that this had been estimated at £1.4 million per day. This figure is made up of the following daily costs:

- £980,000 due to delayed journeys;
- £285,000 cost to the tourist industry, due to reduced visitor numbers; and
- £180,000 cost to the Kent-based road-haulage industry.

74. Adding together all of the above gives a total figure for the immediate costs associated with Operation Stack of around £2 million per day. It is apparent that some of these costs could be obviated by the use of a permanent lorry park as an alternative to queueing traffic on sections of the M20. However, determining how far this is the case is far from straightforward.
How far the lorry park will reduce costs

Costs to the Kent and Medway economy

75. The costs which would seem most likely to be obviated by the creation of the lorry park are those incurred by the Kent and Medway economy—stemming substantially as they do from the disruption and congestion caused by the closure of parts of the M20. Those costs to the NHS which result from factors such as cancelled appointments can presumably also be placed under this heading.

76. However, it was put to us by Peter Connon (a local resident) that:

    significant disruption to M20 coast bound traffic would continue around the site of the lorry park caused by the implementation of safety measures necessitated by the sheer volume of vehicles entering / leaving the new lorry park when in operation.  

77. Lorries may well arrive at a faster rate than they can get in, causing queues on the M20; and funnelling thousands of lorries back onto the M20 is highly likely have a similar effect. Neil Walker (another local resident) told us:

    Assuming 10 lorries can be released per minute (amounting to one every 6 seconds, which seems an optimistic number), it will take 6 hours to clear the park when full, this is likely to lead to congestion and raises a significant risk of accident.

78. At the rate of release which we were told was necessary to ensure that ferries sail without unfilled capacity (300 per hour, or one every 12 seconds), it would take 12 hours to clear the lorry park if it were filled to a capacity of 4,000. And it seems a heroically optimistic assumption that, even with highly efficient marshalling and no accidents, breakdowns or other problems, this rate of release could be sustained over such a long period. Of course it would be possible to have a more managed release rate if ferries do not have to depart full.

79. A complicating factor in marshalling vehicles will be the need to separate out those carrying cargoes that are: urgent or perishable (to allow a “quick-to-market” arrangement); dangerous (for “quick-to-market” purposes and to facilitate safety precautions); or refrigerated (as these will need power supplies if engines are not to be kept running constantly).

80. Any delays on the M20 caused by vehicles entering or leaving the lorry park will presumably occur without the diversion arrangements that apply when Operation Stack is deployed on the carriageway. If so, the resulting disruption is likely to be all the more serious.

81. The point was also made to us that the construction of the lorry park will not guarantee that Operation Stack never occurs again. Should the number of queued vehicles exceed the capacity of the site, then it will still be necessary to close part of the M20 in order to

\[101\text{ Peter Connon (OPP 002)}\]
\[102\text{ Susan Barnwell (OPP 005), Monks Horton Parish Meeting (OPP 010)}\]
\[103\text{ Neil Walker (OPP 001)}\]
\[104\text{ Monks Horton Parish Meeting (OPP 010)}\]
accommodate the surplus vehicles.\textsuperscript{105} While the lorry park would be unnecessarily large for normal Operation Stack events, were an exceptional event on the scale of summer 2015 to occur again, it would be too small.\textsuperscript{106}

82. We further heard in evidence that the lorry-park plan does not take adequate account of the substantial growth in cross-Channel freight traffic that is predicted. Eurotunnel told us:

> We believe that a permanent lorry area would only improve the situation in the very short-term and that by the time it is built, the capacity would be too small compared to traffic growth.” \textsuperscript{107}

Thus, over time, it would become increasingly likely that disruption to cross-Channel services would still lead to vehicles being queued on the M20.

83. When we asked Jon Griffiths, Deputy Director of the Road Investment Strategy Division at the DfT, about this, he could only tell us:

> We are currently doing that work [evaluating the impact of predicted increases in traffic]. It is very difficult to do but it is something we are very mindful of in terms of demonstrating the value for money of the scheme. The difficulty is to make sure that we can quantify it in a way that can be put together against other schemes or how we would normally do these things.\textsuperscript{108}

84. Mr O’Sullivan made the point that, even if some deployment of Operation Stack in addition to the lorry park were necessary, the existence of the lorry park would still greatly alleviate the situation by taking up to 4,000 vehicles off the carriageway. He told us:

> as you introduce each phase [of Operation Stack] it becomes disproportionately more painful. The first phase blocks a single section of road, and people can find other routes and get around it. When you block a second section you start to form a logjam. By the time you get to the third section, you are actually interfering with traffic in both directions. Therefore, all the traffic is now trying to pass each other in opposing directions on local roads [ … ] if it goes on for days on end [ … ] by the time you get to the third or fourth day [ … ] the backlogs into the future are not easily recovered.\textsuperscript{109}

85. The point was also put to us by Robert Auger (a member of Lympne Parish Council) that the building of the lorry park, given its scale and location, could actually cause much worse disruption than was experienced during Operation Stack in the summer of 2015.\textsuperscript{110} While this would not, of course, be recurring disruption, it is a cost that should be taken into account in assessing the cost-benefit case for the lorry park.

86. In respect of other types of cost related to Operation Stack, there are also reasons for doubting how far these would actually be obviated or diminished by the lorry park.
**Costs to the freight industry**

87. The estimated costs imposed by Operation Stack of £180,000 per day on the Kent-based road-haulage industry and £750,000 per day on the whole UK freight industry presumably relate for the most part to the impact of freight traffic being delayed. We were told a lorry park will not help to avoid such costs; costs resulting from delays will be the same irrespective of whether vehicles are queued in a lorry park or on the carriageway.\(^\text{111}\)

**Logistical costs of Operation Stack**

88. Matthew Balfour, the Cabinet Member for Environment and Transport at KCC, was confident that the lorry park could be operated without incurring many of the logistical costs that have hitherto been associated with Operation Stack:

> [I]f it is properly organised in terms of lanes, lights and number plate technology, we should not have much cost in terms of people. It could be run from a control room [ … ] The big cost of having police cars all over the place and then having to provide all sorts of other things in a motorway Stack situation would be gone. You could take the lorries off, the technology would put them into the right lane and then they could be taken out in the right way.\(^\text{112}\)

The FTA likewise thought that the lorry park “could potentially be managed without any police intervention”.\(^\text{113}\)

89. However, Mr O’Sullivan, of Highways England, indicated that there was as yet little certainty about how these matters would be organised. He could tell us only that:

> We have been in discussion with Kent police, and we recognise that a new lorry park needs a new set of standard operating procedures. We will be working with Kent police and with Kent County Council and other agencies to see which organisations should fulfil which roles under the new arrangements.\(^\text{114}\)

90. We were told that during Operation Stack there were significant problems with non-compliance. Mr Brewer noted that, even though Operation Stack is an “intuitive process” and drivers are told that they will not be allowed to use a cross-Channel service without proof that they have been through the queue:

> we were still experiencing at its worst something like 30% non-compliance. Drivers chose to go around the outside and were then turned away at the gate to join the queue at the back. You get very odd behaviours [ … ]\(^\text{115}\)

Various subterfuges were reportedly resorted to in order to circumvent the queue.\(^\text{116}\)

91. Even with the use of the technology described by Mr Balfour, it is unclear to what extent police and Highways England staff would still be required in order to ensure smooth-running and enforce compliance.
Cost of Operation Stack to the wider UK economy

92. Mr Carter, of KCC, told us that the impact of Operation Stack on the wider UK economy was made all the more acute by the fact that industrial enterprises operate without large stockpiles of parts and supplies:

I gather that Rolls-Royce was seriously impeded [in summer 2015] by the many parts to manufacture Rolls-Royces being held up in Operation Stack. The production line had to be delayed while they waited for the goods to arrive. Most of the big manufacturing plants have just-in-time delivery of the components they need to manufacture their product.¹¹⁷

93. KCC told us that “The Freight Transport Association (FTA) estimates a wider cost to the UK economy of £250 million per day. A Lorry Area would therefore also benefit the national economy.”¹¹⁸ This figure has been widely cited, with the same attribution; and it was referred to in other evidence to us as a justification for building the lorry park.¹¹⁹

94. However, the FTA itself told us that it was not responsible for this figure and understood it to have been arrived at by means of a somewhat crude methodology. Ms Chapman told us:

There are questions as to where that originally came from. We understand that it was originally a port of Dover figure and was based on calculating a figure of £89 billion, which is the worth of UK goods passing through the port of Calais on the Calais-Dover route each year. That was divided by 365 days and that is how that figure was arrived at.¹²⁰

95. The statistic thus does not take any account of freight traffic passing through the Channel Tunnel. More importantly, it does not allow for the fact that a proportion of freight traffic is actually diverted through other French ports when Calais is closed. Most importantly, it assumes that all the loads of freight which are unable to travel during cross-Channel disruption are simply lost. In fact, only perishable loads are lost completely; the vast bulk of freight is simply delayed.¹²¹

96. Clearly, there are some costs to the UK economy involved in cross-Channel disruption—but no reliable method has yet been devised for calculating these. The DfT has commissioned research from Transport Systems Catapult on this subject, which the Department hopes to be able to publish soon.¹²²

97. In any case, as was pointed out to us in respect of the freight industry, the costs incurred as a result of disruption to cross-Channel transport will not be diminished by the fact that vehicles are queued in a lorry park rather than queued on the M20.¹²³

¹¹⁷ Q63. See also Qq147, 158.
¹¹⁸ Kent County Council (OPP 021)
¹¹⁹ Damian Collins MP (OPP 058)
¹²⁰ Q146
¹²¹ Guardian, “Is the Calais crisis costing the UK £250m a day in lost trade?”, 30 July 2015
¹²² Qq191–2; Department for Transport (OPP 063)
¹²³ Q100; Monks Horton Parish Meeting (OPP 010), Graham Horner (OPP 041), Neil Walker (OPP 060)
Cost of building the lorry park

98. When we took evidence from Mr Carter, of KCC, in October 2015 he told us “I believe you can deliver a park somewhere in the vicinity of junction 11 for £40 million or £50 million”.124 Damian Collins, the MP for Folkestone and Hythe, informed us that Highways England had estimated the cost of the lorry park at £160 million.125 However, as we have noted, the Government has earmarked a much larger sum for building the proposed lorry park. Mr O’Sullivan, of Highways England, confirmed that his organisation was the source of this figure: “We came back to Government and said that a physical engineering undertaking on this scale could cost up to £250 million”.126

99. He indicated that the precise cost of constructing the lorry park could not yet be calculated, as consideration was still being given to options for how exactly it would be used. It was certain that there would need to be “500,000 square metres [50 hectares] of tarmac”. In addition, there would have to be “a huge drainage programme as part of that”, to deal with “something like six or 10 Olympic swimming pools every day if it rains”.127 The drainage arrangements would need to be adequate to prevent the contamination of drains and local watercourses with diesel-polluted water. This meant that “We would probably need a pumping station”. In addition, “There would be minimal welfare facilities for drivers and other occupants of the lorry park.” And, under one of the two options for the location of the lorry park, a bridge over the M20 would need to be built, to link the two halves of the park. Mr O’Sullivan did not, though, give us even rough estimates of the cost of the various elements of the lorry park to which he referred. He assured us that Highways England would “spend the minimum we need to spend in order to make this thing feasible and make it work”.128

Whole Life Costs

100. Regarding who would actually operate the lorry park, and how the cost of doing so (including funding the provision of welfare facilities for drivers) would be met, we again found that there was no certainty. David Monk, the Leader of Shepway District Council, told us:

I do not have an exact answer but I have been told in a discussion that both the port and the tunnel operators would be happy to control it. How they would do that I do not know, but as they are the ones that call them down I think that would work for the exit.129

101. Mr Balfour added that he thought “the expertise that both the port and the tunnel have would be of immense help” in operating the lorry park, but he gave no indication that the matter had even been broached with them.130 It certainly was not mentioned in evidence that we received from the Port of Dover and Eurotunnel.

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124 Q61
125 Damian Collins MP (OPP 058)
126 Q184
127 Stanford Parish Council estimated that “a holding tank the size of 24 Olympic-sized swimming pools will be needed to comply with sustainable drainage criteria” – Stanford Parish Council (OPP 015).
128 Q216
129 Q152
130 Q153
It was pointed out to us that, in addition, the lorry park would “cost money while empty because it needs to be maintained. That in itself is not going to be cheap.”\textsuperscript{131} Mr O’Sullivan conceded that:

There will probably be ongoing costs. We will need to inspect the facility. We will need to make sure that the perimeter fence is secured. There are risks and hazards around having a site of that size that is not regularly occupied. The costs will be in the order of the low hundreds of thousands a year, we think.\textsuperscript{132}

There will clearly be significant long-term costs associated with operating, maintaining, renewing and, eventually, decommissioning the lorry park. Yet we have been given no indication (beyond a general promise by the DfT that HM Treasury’s Green Book will be adhered to)\textsuperscript{133} that detailed Whole Life Costs are going to be provided.\textsuperscript{134}

**Impact of the lorry park on the local area**

104. Dr Hilary Newport, Director of the Kent Branch of the Campaign to Protect Rural England, told us that if the lorry park were built at Stanford as planned it would represent the unacceptable “industrialisation” of “a very open area of countryside”.\textsuperscript{135} Its visual impact on the setting of the nearby Kent Downs Area of Outstanding Natural Beauty (AONB) would be particularly intrusive and deleterious, thought Dr Newport.\textsuperscript{136} It must be remembered that the visual impact of the proposed sites needs to be considered in the context of the M20, large motorway junction and existing industrial development that the proposed park would be adjacent to.

105. We did hear about the possibility of measures to mitigate the visual impact on the Kent Downs. Damian Collins MP thought that the Stanford West site offered “good opportunities for buffer planting and landscaping to provide additional screening of the lorry park. This should mitigate any visual impact that the site may have.”\textsuperscript{137} However, Dr Newport told us that, while some such mitigation would be possible:

What would not be possible would be to mitigate the visual impact of the views down from the AONB over the lorry park. The movement, light and noise that would be caused by the use of the car park is what would have an unacceptable impact.\textsuperscript{138}

\textsuperscript{131} Q117
\textsuperscript{132} Q217
\textsuperscript{133} Department for Transport (OPP 063)
\textsuperscript{134} Whole Life Costs take into account not just the initial price of a capital project, but also expenditure relating to: operation (day-to-day running); maintenance (the prevention or slowing of deterioration); asset renewal (repair, to restore the asset to its original state; or upgrading, to improve it beyond its original state); and eventual disposal (once the asset has reached the end of its useful life). The Green Book requires that “Costs and benefits considered should normally be extended to cover the period of the useful lifetime of the assets encompassed by the options under consideration” – HM Treasury, \textit{The Green Book: appraisal and evaluation in central government}, 20 October 2015, para 5.10.
\textsuperscript{135} Q93
\textsuperscript{136} Qq 91–3
\textsuperscript{137} Damian Collins MP (OPP 058)
\textsuperscript{138} Q94
106. The sheer scale of the lorry park, we heard, is the key consideration. Extending over some 65 hectares, it would be equivalent in size to Disneyland (California), the Vatican City (see Figure 4) or 90 football pitches. Matthew Webb, Chair of Stanford Parish Council, told us:

It is one thing to say that we have mitigated smaller lorry parks with 300 vehicles, but this would be trying to mitigate the light and noise pollution for something eight times that size; we do not even know what is needed to do that.139

Figure 4 Comparison of proposed lorry park with other large sites

107. A lorry park on this scale would be completely without precedent in the United Kingdom and Europe; and there only appears to be one other lorry park in the world of a comparable size (see Figure 5).

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139 Monks Horton Parish Meeting and Sellindge & District Residents Association (OPP 038), Peter Masters (OPP 044), Graham Horner (OPP 041)
140 Q99
Some supporters of the lorry park baulk at the proposed scale of it. Sellindge Parish Council, for instance, has indicated its preference for a facility half the planned size (with capacity for 2,000 vehicles).\textsuperscript{141}

In addition to the visual impact, the local community is apprehensive about thousands of vehicles “moving in queues or running refrigeration units and spewing a large amount of diesel emissions and the particulates they contain into the public air”, affecting the health of local people, as Mr Webb told us.\textsuperscript{142} It was pointed out that, when lorries are queued on the M20, fumes are diffused over a wide area, whereas in the lorry park, air pollution would be concentrated.\textsuperscript{143}

This issue might be partly addressed by providing electricity for refrigerated units, allowing drivers to switch off their engines without their loads spoiling. But this will obviously create a further cost factor for the lorry park; and vehicles, in a large concentration, will still need to run their engines while manoeuvring into, around and out of the lorry park.

Another issue raised with us was the impact on the housing market, with residents already reporting difficulty in selling properties.\textsuperscript{144} We also heard that there are fears in

\begin{itemize}
\item \textsuperscript{141} Q97, 130, 134; Graham Horner (OPP 041)
\item \textsuperscript{142} Q95. See also Stanford Parish Council (OPP 015), SOS Kent (OPP 062).
\item \textsuperscript{143} Ronald Lello (OPP 014)
\item \textsuperscript{144} Ian Bray (OPP 008)
\end{itemize}
the local community of crime, noise and anti-social behaviour (such as littering) at times when the lorry park is in use, when it would constitute a small town of several thousand people—substantially larger than the population of Stanford itself.\footnote{145} Residents have particular fears that the lorry park could be a focus for drug-dealing and prostitution.\footnote{146} There is also anxiety that the lorry park could attract anti-social behaviour during the protracted periods when it would stand entirely (or mostly) empty.\footnote{147} The extent of these risks would, of course, partially depend on how much is to be spent on security arrangements for the lorry park.

112. Other fears raised with us related to the impact on local sewerage and water courses (including the possibility of an increased risk of flooding).\footnote{148} Such issues can, of course, be addressed by building appropriate infrastructure but, again, doing so will add to the cost of the lorry park.

113. Some of these negative local impacts of the lorry park are clearly site-specific (for instance in relation to the impact on the Kent Downs AONB). However, irrespective of where the lorry park is built, there will inevitably be major adverse effects, of various kinds, on the locality—and these will need to be taken into account in any cost-benefit analysis.

### The lorry park as a solution to fly-parking

114. Operation Stack leads to some parking in illegal or otherwise inappropriate locations (known as “fly-parking”) by non-compliant drivers. Fly-parking by lorries is also a major, chronic problem in Kent quite separate and apart from Operation Stack. Damian Collins MP told us that many of his constituents are unhappy about lorry drivers damaging kerbs and verges, and leaving behind waste (“including human waste”).\footnote{149} Fly parking is a particular problem for Highways England, since much of it occurs in locations for which the organisation is responsible (for instance on hard shoulders and under motorway bridges).\footnote{150}

115. Alternatives 3 and 4 proposed by Highways England\footnote{151} envisage using 500 spaces (around an eighth of the lorry park’s overall capacity) for overnight parking, for which a fee would be payable. The consultation document states that:

> Anecdotal evidence indicates that this could be sufficient to meet local needs regarding inappropriate lorry parking, but further evidence will be obtained before including any proposals in the preferred option consultation.\footnote{152}
Matthew Balfour, the KCC Cabinet Member for Environment and Transport, likewise told the Committee: “The estimates are that there are at least 500 lorries a night not going into the lorry parks that currently exist”.  

116. This may increase the value-for-money case for the lorry park, given the likelihood that, were it to be used purely in connection with Operation Stack, it would stand empty and unused the vast majority of the time. Mr O’Sullivan assured us that use of the lorry park for such a purpose would be self-funding (apparently involving a private-sector operator) and would not interfere with the use of the lorry park for its primary purpose.  

117. There were those, including some local-government bodies, for whom the potential use of the lorry park as a solution to fly-parking was a significant reason for supporting it. However, we also heard strong counter arguments. It was pointed out to us (and not only by opponents of the Stanford lorry park) that parking capacity to address fly parking is needed across much of Kent (if not the rest of the country), rather than concentrated in a single location. This is because drivers stop and take breaks wherever they happen to be when they are at risk of exceeding their legal hours. In addition, the provision of further paid-for parking capacity will not address the problem of those drivers who fly-park in order to save money. We also heard that enforcement measures (including Traffic Regulation Orders) would be necessary, as well as further parking spaces, if the problem of fly parking was to be effectively addressed.  

118. We heard concerns that use of the lorry park for overnight parking when it is not needed for Operation Stack could compete with existing commercial truckstop providers in the area. Stop 24 (which has 250 lorry parking spaces at present) is currently turning away 40 to 50 vehicles per night due to lack of capacity. This provider has plans for up to 1,000 extra spaces on land adjacent to its current site—land which Highways England actually envisages forming part of the Stanford West lorry-park option. The owners argue that their planned extra capacity could also be used as part of Operation Stack; and it would be at a fraction of the cost per space which the planned new lorry park will entail. Ashford International Truckstop plans to expand from 390 spaces to 650 in the next couple of years. However, these plans are in abeyance pending the outcome of the Highways England consultation; and the operators say they may even shut down altogether if it is decided to use the new lorry park for overnight parking.  

119. Alternatives 3 and 4 put forward by Highways England would add 500 overnight parking spaces, they could lead to the loss of an equivalent number of private spaces to
those provided for via the proposed new lorry park. On the other hand, the possibility cannot be discounted that the truckstop providers are overstating matters in order to bolster the case against this potential competitor.

120. When we asked the Minister about these concerns, he did not seem to regard them as a major problem:

   Are we deterring investment? Speedy delivery of this project will provide the economic certainty that people need when they are making investments. There is no evidence of that problem particularly having taken place.163
4 Alternatives to the lorry park

121. It was apparent in the evidence we received that, in addition to the lorry park plan, there is a wide range of other options for addressing the problems associated with the deployment of Operation Stack. In a number of cases, we were told that, even if the lorry park were to be built, other solutions would also need to be deployed alongside it, as it would on its own not be an adequate answer.164

122. In oral evidence, Mr O’Sullivan told us that a detailed study of alternatives to the lorry park had been carried out “within Highways England”.165 In subsequent written evidence, Highways England said they had:

consulted with key stakeholders from the Operation Stack Advisory Group, which includes local authorities, emergency services, port operators, haulage industry representatives and our own in-house experts [...] Also many of the proposals [...] were discussed with Kent County Council in their sessions and at the Gold Command Meetings. The general conclusion reached was that a single off-road lorry area is the most appropriate solution [...] Further suggestions came forward during the public consultation which we carefully assessed and compared against each other and against the consultation sites.

The outcome of all this was now before the Government for a decision and it would be inappropriate for Highways England to make it public while the Minister was still deliberating.166

123. We did, nevertheless, hear some information from Highways England on several of their objections to proposed alternatives to the lorry park.

Upgrading the M20

124. The European Gateway Strategic Delivery Group suggested “Strengthening the hard shoulder M20 J8-10 coast-bound and amendments to central reservation J10-11a to improve resilience and flexibility of use of the link” as part of the package of measures put before COBR in August 2015.167

125. Monks Horton Parish Meeting, which opposed building the lorry park, suggested to us that:

Contraflow systems are used on many motorways throughout the country and a reduced speed limit could be applied to address safety concerns. It should be no more dangerous than directing all traffic onto the A20, which is not dual carriageway and is quite narrow. A contraflow on the M20 would provide a very quick and cheap solution. Perhaps the westbound hard shoulder could be resurfaced and used, as has been done on parts of the M25. This would allow two lanes in each direction. Cones and signs could be positioned in a
very short time, enabling the M20 to remain open. Even with just two lanes and a reduced speed limit, this would be better than complete closure of the motorway to coast-bound traffic.\textsuperscript{168}

126. The Port of Dover argued that, in addition to building the lorry park, Highways England must:

\begin{quote}
compare methods of achieving two-way contraflow on the M20 [ ... ] Such a method would result in the building of more flexible infrastructure, able to deal with both emergency uses and provide capacity for future growth.\textsuperscript{169}
\end{quote}

127. Highways England explained to us that the existing hard-shoulder of the M20 was designed for use only by individual vehicles in the event of a breakdown; as such, it could not withstand the weight of a large number of vehicles. To make it suitable for this purpose, the hard shoulder would need to be upgraded to the much higher standard used in modern “Smart motorway” schemes.\textsuperscript{170} (We will shortly be publishing a report following an inquiry that we have been undertaking into one such type of scheme, All Lane Running.)\textsuperscript{171} This had quickly been ruled out on the grounds that it would not be cost-effective. Mr O’Sullivan told us that:

\begin{quote}
Currently, the typical costs for [motorway] widening are about £10 million to £11 million per mile per carriageway [ ... ] Even if we spent a much greater sum of money than the £250 million we are talking about, we would possibly still only end up with single lane running when we had to deploy Stack.\textsuperscript{172}
\end{quote}

128. Highways England subsequently told us in written evidence that:

\begin{quote}
The cost of widening a portion of motorway which could accommodate 3,600 lorries, avoiding the need to implement Stages 3 and 4 of Operation Stack and in most cases Operation Stack Stages 1 and 2 (effectively another 72 kms of network) would be approximately £500 million–750million. This was discounted as an option at an early stage due to its high cost [which] does not [even] take into account the need for major junction reconfigurations or the purchase and placement of movable barriers which would be required during the implementation of Operation Stack for non-port and tourist traffic to pass safely by parked lorries.
\end{quote}

In addition, the existing motorway surface, which is “of the older concrete type”, would also require replacement, increasing the cost. And “traffic management for safety reasons”, restricting access to the existing hard shoulder during construction, would raise the question of where lorries would be parked in the event that Operation Stack had to be deployed at that time.\textsuperscript{173}

\textsuperscript{168} Monks Horton Parish Meeting (OPP 010)
\textsuperscript{169} Port of Dover (OPP 004). See also Kent Downs AONB Unit (OPP 037).
\textsuperscript{170} Q187; District Councillor Jenny Hollingsbee (OPP 020). “Smart motorways” (previously known as “Managed motorways”) are intended to increase capacity and reduce congestion through flexible modes of operation. They include “Dynamic Hard Shoulder Running” schemes (where the hard shoulder can be opened as a running lane in busy periods) and “All-Lane Running” schemes (where what was previously the hard shoulder is used as a permanent running lane) – Highways Agency, England’s motorways are getting smart, 2013.
\textsuperscript{171} Transport Committee, All lane running inquiry launched, 27 November 2015
\textsuperscript{172} Q187. See also Qq208–15.
\textsuperscript{173} Highways England (OPP 057).
Increasing capacity at the Port of Dover and Eurotunnel

129. It was suggested to us that the Port of Dover and Eurotunnel had a responsibility to try and avoid queues backing up unnecessarily by increasing both the scope of their services and the queueing capacity on their sites. We were told that both are already doing this to some extent.

130. The Port of Dover told us that its Traffic Management Improvement Project was improving queueing capacity at the Port; and its plans for a revival of the Western Docks would create more space for freight. In addition, its participation in BRIDGE (“Building the Resilience of International and Dependent Gateways in Europe”) was intended to attract European Union funding for infrastructure development.174

131. Mr Keefe, of Eurotunnel, told us that they had taken account of growing demand and had:

recently expanded the terminal at Folkestone. We have also ordered more trains, so that our uplift capacity will be increased by 20% by 2018. We are looking at moving the traffic quicker and providing a bigger buffer zone to keep it off the motorway when it arrives and we do not have capacity.175

Network of smaller lorry parks

132. We received much evidence to the effect that an effective solution to the problems posed by Operation Stack lies in the building of a network of smaller lorry parks. This would enable a “scalable” solution that could be deployed as required and expanded as traffic volume grows. In addition, such lorry parks could be used for overnight parking, addressing the widespread problem of fly-parking much more effectively than a single site.176

133. We also heard objections to this proposal. It was argued that it would be more costly to operate a network of lorry parks rather than a single large one, as the benefit of economies of scale would be lost. There were also doubts as to whether traffic could be effectively managed and marshalled if it were scattered across numerous sites.177 Mr O’Sullivan told us that enforcement would work better if the queue were near to the Port of Dover and Eurotunnel: “It would be very difficult to send somebody back 80 or 100 miles who has committed an abuse, whereas we think four or eight miles back up the road to the lorry park is achievable.”178 He also argued that the queue needed to be close to the points of embarkation in order for lorries to be funnelled into available capacity “quickly and efficiently in a fairly finite and well controlled window”.179

174 Port of Dover (OPP 053). See also Q245 [Andrew Jones].
175 Q114. See also Q245 [Andrew Jones].
176 Q12, 118, 134, 142, 143, 158 [Matthew Balfour], 169; Peter Connon (OPP 002), Christopher Sexton (OPP 003), Susan Barnwell (OPP 005), Bernard Stickells (OPP 007), Ian Bray (OPP 008), Monks Horton Parish Meeting (OPP 010), Ashford Borough Council (OPP 011), Stanford Parish Council (OPP 015), Kent Downs AONB Unit (OPP 037), Margaret Cooper (OPP 042), Margaret Cooper (OPP 043), Peter Masters (OPP 044), Debbie Burton (OPP 045), Robert Auger (OPP 046), Stowting Parish Meeting (OPP 049), Hythe Civic Society (OPP 050), SOS Kent (OPP 062)
177 Q 160–2
178 Q230
179 Q184
134. Mr Cullum, of the RHA, said:

The difficulty with having a family of truck parks is calling them forward, bearing in mind that the further back they are, the more they will be used for traffic for other purposes than Stack. It is not a bad idea, but I think you have to look at it objectively and look at the plusses and minuses.\(^{180}\)

### Virtual queueing

135. A significant factor in the scale on which Operation Stack has had to be deployed is the fact that large numbers of freight vehicles still head for the Port of Dover and Eurotunnel even when it is known that services are disrupted. Ms Chapman of the FTA explained this as follows: “in order to get across the channel you have to be in the queue, and to be in the queue you have to be in Kent”.\(^{181}\)

136. We were told by several parties that this problem could be largely eliminated by replacing the current system of “open ticketing” (that is “first come, first served”) on both ferries and Eurotunnel with an electronic system of timed tickets (“virtual queueing”). This would also facilitate the operation of a network of smaller lorry parks as part of Operation Stack.\(^{182}\)

137. Stanford Parish Council explained to us how this would work:

Drivers would be allotted a place in the queue and told by the cross-channel operators when to arrive at the port based on how the port is running (in this context, Eurotunnel is a port.) Drivers would then make their own decisions whether to wait or continue to the port based on traffic conditions between their current location and the port. Drivers could be updated continuously on the port and traffic status either via their companies’ control rooms or direct from the port operators and highway authorities. Information would be presented succinctly on mobile devices and satellite navigation services. Freight drivers would then be in much the same situation as non-freight drivers (“tourists”) who are allocated a particular sailing or shuttle time and can plan to delay their journey if notified of delays at the ports.

In consequence, at most only “two hours’ supply” of vehicles would need to be parked in the vicinity of the Port of Dover and Eurotunnel, including those in the cross-Channel operators’ own queueing facilities.\(^{183}\)

138. The Chair of the Parish Council, Mr Webb, told us: “We manage to fly thousands of planes around the world every day and not crash them all at the end of it. We can manage some lorries on a motorway in a more intelligent way than we are currently doing.”\(^{184}\)

139. However, we also heard significant doubts about the feasibility and enforceability of virtual queueing. The FTA told us it was “not opposed to the idea in principle” but had “concerns about how it would work in practice”:

\(^{180}\) Q13  
\(^{181}\) Q12. See also Q50.  
\(^{182}\) Peter Connon (OPP 002), CPRE Kent (OPP 012), Stanford Parish Council (OPP 015), Stowting Parish Meeting (OPP 049)  
\(^{183}\) Stanford Parish Council (OPP 015)  
\(^{184}\) Q108
there will be a combination of education and enforcement required. It would need to be very simple and lorries would need to be located close enough to Eurotunnel and Dover so that they can be quickly released as soon as there is capacity available. It is likely that a virtual queue would require extensive police resources [...]. It must be remembered that approximately 85% of cross-channel freight traffic is not UK registered and language and cultural barriers must be factored in too.

140. Mr Keefe, of Eurotunnel, told us that virtual queueing and timed tickets:

would need the transport operators to co-operate. The decision makers are the logistics managers of the hauliers who move trucks around the economy. They are making decisions as traffic heads towards any port or any destination and telling their drivers exactly which route to follow and which choices to make.

141. Mr O'Sullivan also raised the issue of:

perceived fairness among the trucking community. One of the advantages of the current arrangement [...] is that the truck drivers themselves can physically see the people who arrive before them and the people who arrive after them.

Switching operators

142. We were told that it would help matters if lorry drivers were able to switch between the ferries and Eurotunnel when one or the other is disrupted.

143. According to Mr Keefe, it is already easy to switch between providers:

The logistics management of [the freight] companies will tell the drivers when they have information from us or the port. They will say, “There is a queue. There is a technical problem or bad weather; therefore transfer to the other route.” That decision is being made in real time as they come down the motorway network to the port. It might be even a junction or two ahead of arrival at the tunnel when a decision is finally made to go one way or another. That happens already in real time.

144. However, there do not appear to be any cross-ticketing arrangements (allowing the interchangeability of providers’ tickets), which would further facilitate such flexibility.

Upgrading the A2 / M2 freight corridor

145. We heard there was widespread support for the upgrading of the A2 / M2 freight corridor and the A256 (where it forms an alternative approach to Dover from Whitfield).
It was put to us that this would aid the separation of Eurotunnel and Port of Dover traffic, while also allowing Dover traffic to be queued away from the M20. It was put to us that this would aid the separation of Eurotunnel and Port of Dover traffic, while also allowing Dover traffic to be queued away from the M20.\textsuperscript{190} Mr Waggott, of the Port of Dover, told us:

Government must think about bifurcation of the routes down to Dover and Eurotunnel ultimately; and the third Thames crossing with the associated road improvements. It is a key freight corridor. We must deliver it effectively.\textsuperscript{191}

146. Highways England told us that upgrading of the M2, as regards widening or going over to “Smart motorway” operation, was planned (no dates were given)—but it was not thought to be cost-effective to bring this forward.\textsuperscript{192}

147. It was suggested to us by Dover District Council that “Consideration should also be given to a review of the former proposals […] to upgrade the A260 route from Lydden on the A2 through to Hawkinge, thereby acting as the most easterly rung in the ladder between the M20 / A20 and M2 / A2 corridors”.\textsuperscript{193} However, it is unclear how exactly this would assist any alternative arrangements to Operation Stack.

148. In her letter to the Secretary of State, our Chair referred to the importance for the national economy of good access to the Channel ports, as indicated in a report of our predecessor committee.\textsuperscript{194} She underlined the need for “further investment to improve the [road] network [in south-east England] and remove bottlenecks”, including the building of a new Lower Thames Crossing.\textsuperscript{195}

149. In his reply, the Secretary of State said that Highways England would be consulting on a proposed route for the new Lower Thames Crossing in 2016.\textsuperscript{196} The promised consultation duly took place between 26 January and 24 March 2016.\textsuperscript{197} We expect the Government to announce the route, location and type of crossing later this year.

Use of alternative ports

150. The point was put to us that freight resilience requires less reliance on the Port of Dover and Eurotunnel for the transportation of freight vehicles to and from the continent.\textsuperscript{198} However, we also heard that freight carriers overwhelmingly do not want to use alternative ports, since this entails much longer crossing times, as well as arriving at destination ports that carriers do not wish to use.\textsuperscript{199}

151. Consequently, the available alternative UK ports are simply not big enough to be able to substitute temporarily for the Port of Dover or Eurotunnel on the occasions when

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190 Qq31, 85, 87 [Paul Watkins]; Peter Connon (\textit{OPP 002}), Christopher Sexton (\textit{OPP 003}), Port of Dover (\textit{OPP 004}), Bernard Stickells (\textit{OPP 007}), Monks Horton Parish Meeting (\textit{OPP 010}), Stanford Parish Council (\textit{OPP 015}), Kent County Council (\textit{OPP 021}), Eurotunnel (\textit{OPP 022}), Freight Transport Association (\textit{OPP 025}), Enid and Prue Waller (\textit{OPP 029}), Dover District Council (\textit{OPP 030}), Port of Dover (\textit{OPP 053}), SOS Kent (\textit{OPP 062}).

191 Q42

192 Q208

193 Dover District Council (\textit{OPP 034})


196 Transport Committee, \textit{Correspondence between the Transport Committee and Secretary of State regarding Operation Stack}, October–November 2015


198 CPRE Kent (\textit{OPP 012}), Stanford Parish Council (\textit{OPP 015}), Kent Downs AONB Unit (\textit{OPP 037}), Margaret Cooper (\textit{OPP 042}), Stowting Parish Meeting (\textit{OPP 049})

199 Q86
\end{flushleft}
services across the Strait of Dover are disrupted. Mr Waggott, of the Port of Dover, told us that: “There is not the substitutable capacity anywhere in the land to handle the total volume that goes through Dover and Eurotunnel.”

**Modal shift**

152. The Government encourages the carriage by rail of freight that would otherwise be carried by road through the Mode Shift Revenue Support scheme. This assists companies with the operating costs associated with running rail and inland waterway freight transport as alternatives to road transport (where rail/inland waterways are more expensive than road). There are a number of benefits associated with modal shift including a reduction in congestion, less noise, better local air quality and fewer accidents.

153. Mr Keefe, of Eurotunnel, told us that he thought part of the solution to the problems caused by Operation Stack was “modal shift on to rail for a certain amount of [freight] traffic by enhancing the rail freight network through Kent.” Others put similar arguments to us. An alternative form of modal shift would be for Eurotunnel to have lorry-transporter trains that do not stop at Folkestone but run straight through to a remote hub where the lorries disembark and then proceed to their destination. Dr Alan McKenna suggested to us that with such a system:

> At times when there are problems on the continent the lorries could then be held at these hubs, rather than converging on Kent to cause a breakdown in the road system. [There are] other benefits of such a system—of course huge reductions in emissions is an obvious one.

154. An alternative form of modal shift would be for Eurotunnel to have lorry-transporter trains that do not stop at Folkestone but run straight through to a remote hub where the lorries disembark and then proceed to their destination. Dr Alan McKenna suggested to us that with such a system:

> If you really made the existing rail capacity hum and sing, with modal shift off road on to rail, you might improve things by 4% or 5%, but the growth of freight coming into and out of Dover is going to far outstrip that 4% or 5% in a couple of years. I am not saying it is not worth trying to get the benefits of a bigger modal shift, but without rebuilding railway lines it ain’t going to happen big time.

155. Mr Carter, of KCC, told us that modal shift would require major investment in rail infrastructure:

> If you really made the existing rail capacity hum and sing, with modal shift off road on to rail, you might improve things by 4% or 5%, but the growth of freight coming into and out of Dover is going to far outstrip that 4% or 5% in a couple of years. I am not saying it is not worth trying to get the benefits of a bigger modal shift, but without rebuilding railway lines it ain’t going to happen big time.

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200 Q13. See also Q63.
201 Q101. See also Eurotunnel (OPP 022); Qq113, 120.
202 Peter Connon (OPP 002), CPRE Kent (OPP 012), Enid and Prue Waller (OPP 029), Kent Downs AONB Unit (OPP 037), Margaret Cooper (OPP 042), Debbie Burton (OPP 045), SOS Kent (OPP 062)
203 Dr Alan McKenna (OPP 033)
204 Q64. See also Q72.
5 Conclusions and Recommendations

156. The disruption and cost associated with Operation Stack is a national issue. When Operation Stack is used, it causes significant costs and inconvenience for a large part of the UK economy, and it has a number of local impacts, with the community in south-east Kent bearing the brunt. It is consequently understandable, especially after the events of the summer of 2015, that there is a desire for a permanent solution to the problems associated with Operation Stack.

157. When we initially took evidence on this subject, in October 2015, we heard what seemed to be a strong case for an off-road solution. And, shortly afterwards, the Government committed itself to building a permanent lorry park as the sole answer to this issue. The proposal put forward is for a vast lorry park (it will be on a scale unprecedented in Europe, if not the world, for such a facility) at great expense (with a price-tag of up to quarter-of-a-billion pounds). Such a gargantuan project requires full and careful evaluation in terms of costs and benefits; and it must be clearly demonstrated that all possible alternatives have also been properly evaluated.

158. We are concerned about the lack of information to support the decision taken in favour of this proposal. The decision to proceed with it was taken hastily in reaction to the events of the summer of 2015. Whilst the specific events of 2015 have been resolved, the current trend of migration, as well as the inherent risk of adverse weather and industrial action across the channel, suggest that a continued risk of combining impactful events must be borne in mind when considering the need for an off-road lorry park.

159. Only now, after the decision has already been taken, is a cost-benefit analysis being attempted. We have yet to see any hard evidence that the analysis that is being carried out will be adequate. It is difficult to escape the conclusion that the Government, having committed itself to a particular policy, is now seeking to construct a justification for it.

160. There are considerable risks involved in spending such large sums and the speed of doing so appears to have left some of the usual best practice behind it. But while the events of 2015 were unprecedented the circumstances that lead to that level of disruption remain. The Government is right to seek a solution to minimise the level of disruption affecting communities in Kent when Operation Stack is in place; there are significant national and local benefits from keeping the M20 open. The Government should more clearly show how its proposal for a lorry park will help to deliver such benefits and how the various concerns that have been raised in the course of our inquiry will be addressed. In addition we believe that the Government should take steps to secure the long-term benefits offered by Alternative 4—using any proposed lorry park as a truckstop. We will consider the need for a wider review of existing lorry park and rest area infrastructure in our report on skills and workforce planning in the road haulage sector.\footnote{Transport Select Committee, Road haulage sector: Skills and workforce planning inquiry}

161. \textit{Before proceeding with this scheme, the Government ought to demonstrate the necessity of building the lorry park. In doing so it should adhere to the principles set out in HM Treasury's Green Book and the Department for Transport's own Transport Business Cases guidance (January 2013), including:}
• the undertaking of a Gateway Review Process;

• use of the Five Case Model Methodology, setting out the strategic, economic, commercial, financial and management cases for the lorry park through the development, in succession, of a Strategic Outline Case, an Outline Business Case and a Full Business Case; and

• calculation of Whole Life Costs.

162. As part of this, a comprehensive cost-benefit analysis of the lorry-park plan must be undertaken, giving full weight to:

• the cost-benefit ratios of alternatives to the lorry park;

• whether the lorry park is a proportionate and appropriate solution to the scale and frequency of disruption associated with Operation Stack;

• the environmental and social costs that the lorry park will impose on the locality;

• the value of any benefits that the lorry park will bring locally and to the UK economy; and

• the long-term costs of operating, maintaining, renewing and, eventually, decommissioning the lorry park.

163. It is important that this proposal is not looked at in isolation. The Government’s support for modal shift, improvements to rail freight, improvements to the existing road network, and a decision on the Lower Thames Crossing need to be considered alongside each other. The Government should take a view on how these different improvements to the UK’s strategic transport infrastructure will affect each other and how they can be taken forward in ways that will deliver the best outcomes for the economy and for local communities.
Formal Minutes

Monday 23 May 2016

Members present:

Mrs Louise Ellman, in the Chair

Robert Flello
Mary Glindon
Stewart Malcolm McDonald
Huw Merriman

Will Quince
Iain Stewart
Martin Vickers

Draft Report (Operation Stack), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 163 read and agreed to.

Summary agreed to.

Resolved, That the Report be the First Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned till Monday 6 June at 4.00pm]
Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the inquiry publications page of the Committee’s website.

Wednesday 14 October 2015

Natalie Chapman, Head of Policy, Freight Transport Association, Peter Cullum, Head of International Affairs, Road Haulage Association, and Tim Waggott, Chief Executive Officer, Port of Dover

Paul Carter CBE, Leader, Kent County Council, Assistant Chief Constable Jo Shiner, Kent Police, and David Brewer, Network Delivery and Development Director, Highways England

Paul Watkins, Leader, Dover District Council, and Jennifer Hollingsbee, Deputy Leader and Cabinet Member for Communities, Shepway District Council

Monday 21 March 2016

Dr Hilary Newport, Director, Campaign to Protect Rural England, Kent Branch, Matthew Webb, Chair, Stanford Parish Council, and John Keefe, Director of Public Affairs, Eurotunnel

Matthew Balfour, Cabinet Member for Environment and Transport, Kent County Council, David Monk, Leader, Shepway District Council, and Natalie Chapman, Head of Policy for South East England, Freight Transport Association

Monday 11 April 2016

Andrew Jones MP, Parliamentary Under-Secretary of State, and Jon Griffiths, Deputy Director, Road Investment Strategy Division, Department for Transport, and Jim O’Sullivan, Chief Executive, Highways England
Published written evidence

The following written evidence was received and can be viewed on the inquiry publications page of the Committee’s website.

OPP numbers are generated by the evidence processing system and so may not be complete.

1. Ashford Borough Council (OPP0011)
2. Ashford International Truckstop (OPP0032)
3. Channelports Ltd (OPP0036)
4. CPRE Kent (OPP0012)
5. Damian Collins MP (OPP0058)
6. Debbie Burton (OPP0045)
7. Department for Transport (OPP0019)
8. District Councillor Jenny Hollingsbee (OPP0020)
9. Dover District Council (OPP0034)
10. Dr Alan McKenna (OPP0033)
11. Eurotunnel (OPP0022)
12. Freight Transport Association (OPP0025)
13. FSB (OPP0030)
14. Graham Horner (OPP0041)
15. Henry Boot Developments (OPP0031)
16. Highways England (OPP0013)
17. Highways England (OPP0057)
18. Hythe Civic Society (OPP0050)
19. Kent County Council (OPP0021)
20. Kent County Council (OPP0055)
21. Kent Downs AONB Unit (OPP0037)
22. Margaret Cooper (OPP0042)
23. Margaret Cooper (OPP0043)
24. Monks Horton Parish Meeting (OPP0010)
25. Monks Horton Parish Meeting and Sellindge & District Residents Association (OPP0038)
26. Monserat Properties (OPP0054)
27. Mr Bernard Stickells (OPP0007)
28. Mr Christopher Sexton (OPP0003)
29. Mr Ian Bray (OPP0008)
30. Mr Leslie Barratt (OPP0023)
31. Mr Neil Walker (OPP0001)
32. Mr Peter Connon (OPP0002)
33. Mr Peter Masters (OPP0044)
34  Mr Robert Auger (OPP0046)
35  Mr Ronald Lello (OPP0014)
36  Mrs and Ms Enid and Prue Waller (OPP0029)
37  Mrs Nikki Barratt (OPP0024)
38  Mrs Sharon Hayles (OPP0047)
39  Mrs Susan Barnwell (OPP0005)
40  Office of Rail and Road (OPP0016)
41  Port of Dover (OPP0004)
42  Port of Dover (OPP0053)
43  Road Haulage Association (OPP0035)
44  Robert Auger (OPP0051)
45  Save Manston Airport (OPP0052)
46  Sellindge and District Residents’ Association (OPP0027)
47  Shepway District Council (OPP0017)
48  Stanford Parish Council (OPP0015)
49  Stowting Parish Meeting (OPP0049)
50  Transport Focus (OPP0006)
51  Transport Focus (OPP0056)
52  Westwell Parish Council (OPP0026)
List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the publications page of the Committee’s website.

The reference number of the Government’s response to each Report is printed in brackets after the HC printing number.

**Session 2015–16**

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