## CAPEL-LE-FERNE PARISH COUNCIL

Clerk to the Council
Maureen Leppard

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Alice Fey Planning Support and Land Charges Manager Development Management, Dover District Council Council Offices, White Cliffs Business Park Whitfield, Dover CT16 3PJ

## Re:

25/01050. Scoping Opinion - Environmental Impact Assessment (HGV Parking Facility) Land at Capel West Hougham Kent

## **Extracts from the EIA Report**

The Site is located within the Kent Downs National Landscape with the Folkestone-Dover Heritage Coast also located within 2.5km south-southeast of the Site. The Site lies within the Local Landscape Character Area of the Kent Downs AONB and Alkham.

Site has an Agricultural Land Classification ('ALC') of Grade 3 (good to moderate quality). The Site is the only location identified for the Proposed Development, as it comprises land at the Courtwood Interchange on the A20/M20 strategic road network and with direct slip road access potential from the A20. The Applicant will therefore not be giving consideration as part of the EIA to other sites for the Proposed Development.

Capel-le-Ferne Parish Council do not consider this site to be suitable for a 600 HGV lorry park as it would have a considerable Environmental impact within the area. Whilst the proposed site is in the Parish of Hougham, it would have a considerable impact on the Parish of Capel-le-Ferne.

As stated above, the site is within the Local Landscape Character Area of the Kent Downs AONB and Alkham.

The proposed site is on the side of a hill and would be highly visible and difficult to screen. The use of bunds to screen the site would permanently scar the beauty of the landscape.

The use of the site would increase air pollution with up to 600 diesel lorry movements in the

As the site is considered to be within a dark sky area there would be intolerable light pollution. The proposed site would tarmac over 81 acres of Grade 3 (good to moderate quality) Agricultural Land.

The site would cause unnecessary urbanisation of a rural landscape disturbing the flora and fauna within the location.

If HGVs are to be zero emission by 2040, the site may need refuelling facilities to be installed (electricity or hydrogen). Electricity reinforcement would most likely involve overland infrastructure which would have an environmental impact.

Other points of concern linked to this application but not the Environmental impact are:

- This proposal would be a commercial facility and not a replacement for TAP.
- If HGVs were to use a facility in this area during TAP, they would not be able to rejoin the A20 because the on slip at the Courtwood Interchange is closed during TAP, therefore encouraging HGV drivers to access the Dover Port via the B2011 and Dover Town centre.
- The location of the site is of no benefit to HGV's using the Channel Tunnel.
- If there were a problem at the Roundhill Tunnels or the section of A20 between the Roundhill Tunnels and Courtwood, Capel would still have the problem of HGV's rumbling through Capel village.
- From past experience, problems in this area have led to gridlock around the Cheriton/Folkestone area, a lorry park at Courtwood would not resolve this problem.
- Considering there are fog warning signs in the area of the Courtwood Interchange, is it really a good idea to have 2-way traffic on the slip road?

Whilst Capel Parish Council recognise the need for a parking area for HGVs leaving the UK via the Channel Tunnel or Dover Port, a parking site adjacent to the M20 on the London side of the Channel Tunnel would be more appropriate and should investigated by the Applicant.

Yours sincerely

Maureen Leppard Clerk Capel-le-Ferne Parish Council