



Sessions House  
County Hall  
Maidstone  
ME14 1XQ

25 January 2016

Dear Paul

**Managing Freight Vehicles through Kent: A Highways England  
Consultation on a proposal to create a Permanent Lorry Area adjacent to  
the M20 at Stanford**

**Response from Kent County Council**

This is Kent County Council's (KCC) response to the consultation by Highways England on a proposal to create a Permanent Lorry Area adjacent to the M20 at Stanford. The current arrangement with Operation Stack as the main response to disruption to cross Channel traffic is unacceptable and therefore KCC strongly supports a Permanent Lorry Area to reduce or remove the need for freight traffic to be queued on the M20. It is essential that the motorway is kept open for two-way traffic flow at all times and is never closed for the queuing of freight vehicles.

KCC gives provisional support, subject to Environment Statement, to Highways England's proposal for a Permanent Lorry Area with a preferred site of 'Stanford West' for the principal reasons outlined in response to Question 13 of the consultation questionnaire.

It is supported that this site operates as 'alternative 3: General Disruption and Overnight Parking' for the reasons described in response to Question 9 of the consultation questionnaire. In addition to emergency use in place of Operation Stack on the M20 this proposal will complement the Dover TAP, queues at Eurotunnel and address inappropriate overnight lorry parking. Truckstop facilities are already provided at the Stop24 services and therefore should not be replicated in the proposed Permanent Lorry Area, thus minimising additional disturbance to local residents and the impact on the AONB. The site should accommodate a minimum of 3,600 HGVs so as to reduce the need to implement Operation Stack Stages 1 and 2 (Junctions 8 to 11 coast-bound) in all but extreme circumstances.

The response to this consultation also sets out operational, design, flood risk management, drainage, ecology, landscape and historic environment issues

that need to be addressed by Highways England before proceeding with the proposal and caveat the provisional support given by KCC for a Permanent Lorry Area at 'Stanford West'.

KCC supports property owners who have already been blighted by the proposals to be fully compensated for the loss of property value and inability to now sell if they need or want to move. Property owners affected by the building of the Channel Tunnel benefited from a scheme to buy them out and KCC urges that those affected by the lorry holding area proposals should have the benefit of a similar scheme.

Yours sincerely

Matthew Balfour

Cabinet Member for Environment and Transport  
Kent County Council

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## **Response to the Consultation Questionnaire from Kent County Council**

### **SECTION 1: Information about you**

#### **Q1. How did you find out about this consultation?**

Multiple Choice Selection: Other

Kent County Council (KCC) as the Local Transport Authority is a key stakeholder and meets regularly with Highways England. A Planning Sub-group consisting of KCC, Highways England, Shepway District Council and the Environment Agency meets fortnightly to consider the planning process to support delivery of the Permanent Lorry Area.

#### **Q2. What best describes your interest in filling out this questionnaire today?**

Multiple Choice Selection: I represent others (such as a local/regional/national group/business)

This submission is from Mr Matthew Balfour, Cabinet Member for Environment and Transport at Kent County Council. The Cabinet Member for Environment and Transport acts as the Council's spokesperson and advocate for this area of responsibility. Kent County Council has 84 elected Members representing approximately 1.4 million residents in Kent.

**Q3. How often do you use any part of the M20 or A20 between Maidstone and Dover?**

Multiple Choice Selection: Daily

As stated in Highways England's 'Kent Corridors to M25 Route Strategy Evidence Report' (April 2014), at the start of the M20, where the motorway meets the M25, traffic flows start at approximately 55,000 vehicles per day, peaking at 120,000 vehicles per day when the route reaches Maidstone. The flow is 50,000 – 60,000 vehicles per day east of Maidstone, towards Ashford and Folkestone. All of this traffic is severely disrupted when Operation Stack is implemented.

Due to A20/M20 links with the Port of Dover and the Channel Tunnel, there is also the addition of a large amount of goods traffic which utilises this route. Highways England estimates a constant daily flow of between 10,000 – 15,000 goods vehicles travelling from Folkestone to Maidstone, increasing to 20,000 – 25,000 goods on the M20 around Maidstone. Furthermore, the A20 between Dover and Folkestone consistently experiences traffic flows of between 10,000 and 20,000 vehicles per day, with the number of goods vehicles remaining constant at 3,500 per day. Therefore adequate facilities are required for freight traffic when there is disruption at the Channel ports so that they do not queue on the motorway and to address the severe problem of overnight lorry parking on local roads.

**SECTION 2: Current Operation Stack**

**Q4. How are you personally affected when Operation Stack operates (please tick all that apply)?**

Multiple Choice Selection: Other (please describe)

Operation Stack results in an estimated cost to the Kent and Medway economy of around £1.45 million for each day it is in operation. Scaling the Kent figure up to the 32 days' disruption caused by Operation Stack in 2015 gives an approximate cost of £46 million. However, it is likely that this figure is a substantial under estimate.

The £46 million estimate relates to costs borne by the Kent and Medway economy only; i.e. costs accruing nationally or internationally (e.g. to the freight industry based outside or carrying goods from outside Kent) are not included, therefore the national costs are substantially greater. The Freight Transport Association (FTA) estimates a wider cost to the UK economy of £250 million per day.

Kent businesses are also negatively impacted by Operation Stack with 45% of tourism businesses reported cancellations; 59% considered that they had lost up to 20% of business as a result of Operation Stack.

Kent County Council (KCC) incurred direct costs in June to August for the provision of food, water, wash kits, blankets and additional emergency planning staff of £47,378.

**Q5. Do you agree that the current Operation Stack should remain the main response to major disruption to cross channel traffic?**

Multiple Choice Selection: Strongly Disagree

The current arrangement with Operation Stack as the main response to disruption to cross Channel traffic is totally unacceptable to Kent County Council.

The widespread traffic disruption not only prevents international freight fluidity with direct costs to business and national economies, but also affects local accessibility and business productivity; and undermines the perception of Kent as a place to do business and to visit.

Operation Stack not only has significant impact on the national economy, it also causes direct consequences for the Kent economy through the loss of productivity. Operation Stack itself creates a negative image of Kent, deterring inward investment by the private sector. The perception is that East Kent is the most severely affected and this is where inward investment is required the most in order to help tackle high unemployment rates and lower Gross Value Added (GVA) relative to the wider South East region.

Traffic disruption causes the loss of employee hours, delays to business deliveries and local service provider cancellations. It causes considerable journey time delays and journey time unreliability. There is a significant human cost of the effect of the congestion in the county caused by Operation Stack. This includes care workers not being able to get to those they look after, patients not being able to get to doctor's surgeries or hospital, appointments being missed, and people not being able to access the most basic services, including not being able to get to shops for food etc.

Driver welfare is also a serious concern for both lorry cab drivers and car drivers caught in the congestion. 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.

There is also a direct cost to Kent businesses that cannot carry out their daily work due to difficulties accessing the business itself or its customers. This is particularly so for businesses located on or close to the A20 diversion route.

Operation Stack also impacts on the tourism industry both within Kent and delays to tourist traffic between the UK and France. Tourism is worth £3.4bn to the Kent economy and supports over 65,000 jobs.

### **SECTION 3: Proposed Lorry Area**

**Q6. How much do you support or oppose the provision of a permanent lorry area to reduce or remove the need for freight traffic to be queued on the M20?**

Multiple Choice Selection: Strongly Support

Kent County Council strongly supports a Permanent Lorry Area to reduce or remove the need for freight traffic to be queued on the M20. It is essential that the motorway is kept open for two-way traffic flow at all times and is never closed for the queuing of freight vehicles.

**Q7. How many lorries do you consider that any lorry area should be able to accommodate at any given time?**

Multiple Choice Selection: The suggested minimum 3,600

KCC supports Highways England's suggested minimum 3,600 HGV spaces. This would allow M20 to remain open in both directions for all traffic during most instances of disruption to cross Channel services. 3,600 HGVs and would replace Operation Stack Stages 1 and 2 (J8 to J11 which also has capacity for 3,600 HGVs) in the first instance. Only in extreme circumstances (when the capacity of the Lorry Area is full) would Operation Stack Stages 1 and 2 (J8 to J11) be used, which in combination with the Lorry Area, would provide total capacity for 7,200 HGVs. This would prevent the need to use the London-bound carriageway for Operation Stack (Stages 3 and 4) as was experienced in Summer 2015.

As previously stated, it is essential that the motorway is kept open for two way traffic flow at all times and is never closed for the queuing of freight vehicles, therefore the Permanent Lorry Area should be future proofed to deal with the growth in cross Channel freight traffic that is predicted for Eurotunnel and the Port of Dover. The current average daily demand at the Channel ports is over 10,000 HGVs (2 way flow) and this is forecast to increase to between 14,000 and 16,000 per day in the next decade.

**Q8. If such a facility is built, what would be your priorities in choosing a site location? Please rank 1 to 12 according to your preference, with 1 being most important and 12 being least.**

Multiple Choice Selection:

1. Most effective in keeping M20 open
2. Most effective in reducing delays to local roads such as in Dover and Folkestone
3. Providing overnight lorry parking
4. Maximises road safety
5. Use of the facility has minimal impact on local roads

6. Reducing the attractiveness of local roads as somewhere lorry drivers like to park and offering somewhere relatively comfortable and safe for lorry drivers to rest
7. Minimises the impact on residential amenity
8. Minimises visual/landscape impact
9. Minimises other environmental impacts
10. Least overall cost
11. Providing an income to the taxpayer from parking and other services

**Q9. Four main alternatives are under consideration for the way any lorry area could operate. Please rank these alternatives in order of preference, with 1 being your most favoured and 4 being your least favoured.**

Multiple Choice Selection:

1. Alternative 3: GENERAL DISRUPTION + OVERNIGHT PARKING

Emergency lorry holding area as above, (with free provision for Operation Stack and Dover TAP/Eurotunnel excess) but with the additional chargeable basic overnight parking

Kent County Council supports the operating model of 'alternative 3: General Disruption and Overnight Parking'. The use of the site in this way will reduce the need to close any part of the M20 for Operation Stack. It also provides a better means of managing excess traffic at Eurotunnel which currently creates an informal queue on the M20; and provides an opportunity to complement the Dover TAP so that local traffic congestion is reduced with the Port of Dover queue on the A20. In addition, provision for overnight lorry parking will address the problem of inappropriate overnight lorry parking and complement the work of KCC, the Police and the Districts with enforcement. Despite a lack of capacity and high demand for overnight lorry parking, the private sector has not delivered sufficient provision to meet demand; therefore use of part of the Permanent Lorry Area for overnight parking is supported. The capacity for overnight parking should match demand and should not disadvantage commercial providers in the area, who have paused their own expansion plans pending the outcome of this proposal by Highways England for a Permanent Lorry Area.

2. Alternative 2: GENERAL DISRUPTION

Emergency lorry holding area which reduces or removes the need for Operation Stack and/or Dover TAP and/or any M20 based Eurotunnel queue management.

3. Alternative 1: EMERGENCY USE

Emergency lorry holding area which reduces or removes the need for Operation Stack only.

4. Alternative 4: GENERAL DISRUPTION + TRUCKSTOP

Emergency lorry holding area, with free provision for Operation Stack and Dover TAP/Eurotunnel excess but with additional chargeable overnight parking AND 24 hour lorry only motorway service area facilities including hot food and drink.

NOT SUPPORTED

Kent County Council does not support the provision of a truckstop as with 'alternative 4', as full service facilities for short term parking (less than 2 hours) are already available at Stop24 services. Non-provision of 24 hour services at the proposed sites will minimise additional disturbance to local residents and the impact on the AONB.

**Q10. If you have any comments regarding the effects that any of the alternatives uses may have on the existing and/or future provision of commercial or other lorry parking in the local or wider area, please use the space provided below.**

Kent County Council urges the Department for Transport (DfT) to provide clarity around the commercial overnight parking element of the Lorry Area proposal. Use of the proposed Permanent Lorry Area for overnight parking should be part of a network of lorry parks across the country, which alongside enforcement measures, would address the severe problem of inappropriate lorry parking.

KCC is developing a strategy for a network of small lorry parks at suitable locations across Kent and a partnership approach with the Districts and the Police to address enforcement. The proposed Permanent Lorry Area adjacent to the M20 at Stanford should be integrated with this overall strategy. This strategy should also include improved management of freight traffic through Kent utilising technology to direct HGVs to parking sites and available cross Channel services, i.e. 'ticketing' flexibility between Eurotunnel and ferry operators to ensure optimum fluidity of freight movement. The strategy will also consider the use of alternative ports and routes, including the 'bifurcation' of traffic between the M20/A20 and M/A2 corridors with a new Lower Thames Crossing to the east of Gravesend, completion of A2 dualling at Lydden and on approaches to Dover, and an upgrade of Junction 7 of the M2 at Brenely Corner. This will create a new strategic route from Dover to the Midlands and the North, relieving the pressure on the A20 and M20.

**Q11. In addition to the minimum provision of toilets and hand washing, drinking water and refuse disposal, what facilities should be provided in any solution?**

Multiple Choice Selection: Showers      Food and drink (subject to charge)

**Q12. Do you agree that a lorry area would address the current traffic problems on the M20?**

Multiple Choice Selection: Strongly Agree

KCC has a clear position that the current arrangement with Operation Stack as the main response to disruption to cross Channel traffic is unacceptable and therefore strongly supports a Permanent Lorry Area to reduce or remove the need for freight traffic to be queued on the M20. It is essential that the motorway is kept open for two-way traffic flow at all times and is never closed for the queuing of freight vehicles.

**Q13. Which site would you like to see progressed?**

Stanford West

Kent County Council supports Highways England's proposal for the 'Stanford West' site over the alternative 'Junction 11 North Site'. KCC has investigated many potential sites for lorry parks as an alternative to Operation Stack and has supplied all available information to Highways England. Therefore, KCC supports Highways England's analysis that these two options are the most advantageous.

The principal reasons for expressing a preferred site of 'Stanford West' include:

- The main access to the site would be direct from the M20 coast-bound, therefore reducing the impact on KCC's road network, unlike 'Junction 11 North' which would affect traffic at Junction 11 and the B2068.
- The secondary access through Stop24 caters for HGVs that have been turned around if they have not gone through the 'stack queue'. Whereas 'Junction 11 North' would add conflicting movements to the motorway Junction roundabout.
- The part of the site on the south side of the motorway provides permanent facilities for overnight lorry parking (in an extension to the existing parking area at Stop24) and truckstop services already exist at Stop24. This leaves the main part of the site on the north side of the motorway to be used exclusively for HGV queuing to complement the Dover TAP (to reduce queuing and congestion in Dover) and Eurotunnel excess (to reduce informal queuing on the M20) with dedicated access from the M20. The entire site would then be made available for use as an emergency lorry area to reduce the need for Operation Stack on the motorway. In contrast, the 'Junction 11 North' site does not provide any physical separation for the distinct uses and does not utilise any existing facilities.
- The site has less visual impact on the context and setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) and initial investigation by Highways England concludes that there are not likely to

be any significant impacts on the adjacent Site of Special Scientific Interest (SSSI). In contrast the 'Junction 11 North' site directly abuts the AONB and is likely to significantly impact on its setting, and contains ancient woodland, albeit that could be retained.

- Both of the sites are within areas of Safeguarded Mineral Resources which mineral planning policy seeks to ensure are not needlessly sterilised. Non mineral development would normally be subject to the safeguarding policy in the emerging Kent Minerals and Waste Local Plan 2013-30 and would need to meet exemptions tests. Permitted Development rights by Highways England arguably could override this. However, the 'Stanford West' site is preferable for a Permanent Lorry Area as the 'Junction 11 North' site is currently a preferred site in the Draft Mineral Sites Plan and was the subject of detailed discussion at the Minerals & Waste Local Plan Examination.

The 'Stanford West' site does have some disadvantages, including being close to the villages of Sellindge and Stanford and some individual residential properties. This has caused considerable distress in the local community, especially with the lack of detail around the 'footprints' of the proposed sites. Kent County Council is disappointed in this aspect of the consultation by Highways England and it is essential that property owners, who have already been blighted by the proposals, are fully compensated for the loss of property value and inability to now sell if they need or want to move. Property owners affected by the building of the Channel Tunnel benefited from a scheme to buy them out and KCC urges that those affected by the lorry holding area proposals should have the benefit of a similar scheme.

It is essential that buffer planting and landscaping provides additional screening around the proposed site and the consultation document states that there is good opportunity for this. An existing belt of mature vegetation and a man-made lake would probably need to be removed. Part of the site is also close to Westenhanger Castle, a Scheduled Monument. The dissection of the site by the M20 and the need to construct a new bridge over the motorway to provide secondary access, and new slip roads for primary access, will result in longer and more expensive construction costs than the 'Junction 11 North' site which utilises the existing junction with the B2068 upgraded to dual carriageway for access. The part of the site on land adjacent to Stop24 is significantly higher than surrounding land which makes it particularly prominent in views from the AONB to the north; therefore ground levels should be reduced to help to mitigate its visual impact.

#### **SECTION 4: Any other comments**

**Q14. If you have any other comments you would like us to take into account, please use the space provided below.**

There are a number of operational, design, flood risk management, drainage, ecology, landscape and historic environment issues that need to be addressed by Highways England before proceeding with the proposal and

caveat the provisional support given by KCC for a Permanent Lorry Area at 'Stanford West'.

KCC urges that Highways England should consider the following operational issues:

- Access, egress to and from the M20 should prioritise safety of all road users, and be intuitive so as to minimise set-up time and stewarding resource requirements.
- Lorry parking configuration and overall site operation should facilitate efficient, rapid and responsive lorry traffic departure towards Port of Dover and Eurotunnel (i.e. the historic 'off-line' lorry park solution at Ashford was undermined by the personnel-intensive nature of marshalling, traffic control and escorting of lorries), and seek to design-out queue-jumping.
- Spacing between parked lorries should be sufficient to minimise risk of fire spread, with effective procedures in place to ensure separation of hazardous loads and any vehicles carrying livestock.
- Lorry Area mobilisation and operation should seek to minimise any requirement for local resilience partner logistical, welfare and other routine support interventions.
- A multi-disciplinary risk assessment should be undertaken to inform the drafting and subsequent operation of a site emergency plan, which should include warning and informing, muster points, evacuation procedures, emergency service rendezvous points, pollution control and recovery.
- Design and long-term maintenance of the Lorry Area drainage infrastructure should mitigate effects of diffuse pollution run-off from hydro-carbons, road salt, heavy metals and cargo leaks, using technology such as interceptors, wet vegetated balancing ponds, basins and reed-beds.
- Spill kits should be maintained on site in the event of diesel or other leaks from vehicles.
- Native tree and shrub planting specifications and moulding of the landform in and around the physically exposed proposed lorry park site should seek to naturally mitigate against severe weather risks such as high winds, intensive rain or snow fall, and high temperatures.
- All planting should utilise a diverse palette of local provenance native trees and shrub species to reduce bio-security risk and overall vulnerability to pests and diseases.

KCC also urges DfT considers trunking parts of the local road network that the Lorry Area is dependent on for access and egress, in particular, Junction 11. Highways England will then have responsibility for maintenance of the roads that are essential for the operation of the Lorry Area. KCC also makes the case for a small proportion of the funding allocated by Government to repair the damage to KCC's road network, especially verges, damaged by HGVs due to Operation Stack.

Support for the 'Stanford West' site is conditional on a satisfactory Environmental Statement and adequate mitigation measures which will be the subject of a further consultation by Highways England. Further issues that Highways England should take into account are described below for specific areas.

In terms of flood risk management or drainage proposals for the site, Highways England must ensure that they do not increase flood risk off site and they must also apply to KCC for consent for any works within ordinary watercourses (which includes culverts, bridges, infilling, headwalls etc.). In order not to increase flood risk off site, Highways England must ensure that the runoff and volume of water that is discharged from the site never exceeds the pre-development amounts for any return period. Given the nature of the site they will need to consider the pollution risks from the site. Oil-water separators are not very effective, KCC would prefer them to provide a sustainable system that is more effective at separating hydrocarbons and other pollutants and has been used effectively in lorry parking situations, e.g. [Hopwood Motorway Services](#). KCC recommends that they refer to the [CIRIA SuDS Manual](#), the [non-statutory technical standards for drainage](#) and KCC's [drainage and planning policy](#).

In terms of ecology and landscape, both proposed sites are likely to result in considerable visual impacts and would require significant mitigation in landscape terms, primarily due to the exposed nature of the landscape and therefore its visual sensitivity to any new development. Further to this, the proximity of the two sites means that they will have an impact on the setting of the nationally important landscape of the Kent Downs AONB. KCC asks for Highways England to consider Section 85 of the Countryside and Rights of Way Act 2000 which places a duty on all statutory undertakers, which includes Highways England, to have regard to the purposes of conserving and enhancing AONB. As such, KCC would expect a thorough and evidence-led appraisal of the site, which could give confidence that any proposed mitigation measures would be appropriate to the identified landscape character.

It is essential that the potential for ecological impacts to arise as a result of the proposed development is adequately assessed, with consideration of direct and indirect impacts both on and off the proposed sites during construction and operation of the Lorry Area. In particular, the potential for hydrological changes, air quality deterioration and surface water run-off to result in ecological impacts must be incorporated into the assessment.

Both proposed sites are situated within close proximity of statutory and non-statutory sites designated for their ecological interest, impacts to which must be adequately assessed and, where necessary, protected/mitigated for within the proposed development's planning and design. The potential for significant effects on the Folkestone to Etchinghill Escarpment Special Area of Conservation (SAC) must be considered; as a minimum a Habitats Regulations Assessment screening will be required.

The proposed sites and surrounds must be subject to preliminary ecological appraisal, with specific ecological surveys carried out, as appropriate, to confirm the presence of any protected species, assess the potential extents of impacts and inform conclusions regarding mitigation.

The proposed development must implement the mitigation hierarchy, avoiding and reducing ecological impacts; unavoidable impacts must be appropriately mitigated for, with habitats and species retained on site where possible. Only when this is not sufficient to fully avoid and reduce the ecological impacts must off-site mitigation/compensation be secured. There should also be consideration of how the proposed development will ensure no net loss of biodiversity and could result in a net gain; Biodiversity Opportunity Areas within the vicinity may provide opportunities to develop targeted requirements for habitat mitigation and enhancements.

In terms of the historic environment, the option sites are located in a landscape that is generally rich in archaeological remains and includes a wide range of designated heritage assets. Given the scale of the proposed Lorry Areas it will be important to understand how the proposed sites and associated infrastructure might impact upon the wider historic landscape character, especially within the context of the Kent Downs AONB, as well as on the setting of individual heritage assets.

In terms of particular assets, the preferred 'Stanford West' site lies close to Westenhanger Castle, which is a Scheduled Monument and includes the Grade I Listed Westenhanger Manor and Barns; the II\* listed Stanford Windmill is also located nearby. It is likely that significant buried archaeological remains will be present at both sites. The extent and character of such remains cannot be precisely defined at this stage but archaeological investigations undertaken in advance of High Speed One (HS1), give an indication of what might be expected. For example remains of Iron Age and Romano-British date have been identified at Junction 11 on the south side of the M20 Motorway close to the 'Junction 11 North' site, and multi-period remains, including evidence for Bronze Age, Iron Age and medieval activity, have been recorded along the M20/HS1 corridor in the area of the 'Stanford West' site.

The impact of the option proposals on the setting of heritage assets, particularly those of high grade designation, needs to be given careful thought. The setting of such assets is not restricted to consideration of inter-visibility, but includes changes to how a site might be experienced, including

through noise and light pollution. Decision-making should have regard to the statutory duty in the 1990 Planning Act (sections 16 and 66).

Desk-based historic environment assessment (including assessment of the impact on the setting of historic buildings and historic landscapes) will be required to understand the heritage resource in more detail and inform any emerging proposals; archaeological field evaluation is likely to be required at an early stage to inform decision-making. Significant archaeological remains should be preserved in situ (as stated in the National Planning Policy Framework) but where preservation in situ is not appropriate, detailed field investigations will be needed before construction commences.

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Matthew Balfour  
Cabinet Member for Environment and Transport  
Kent County Council

25 January 2016