

M20 Lorry Area  
Highways England  
Bridge House  
1 Walnut Tree Close  
Guildford  
Surrey  
GU1 4LZ

22<sup>nd</sup> September 2016

Dear Sir/Madam,

### **M20 Lorry Area Stanford West Consultation**

I am writing to you on behalf of Maidstone Borough Council in response to the above mentioned consultation. In common with the rest of the M20 corridor, the deployment of Operation Stack can cause significant problems for the local road network in Maidstone, affecting the ability of residents to go about their daily activities and adding extra costs to local businesses. We very much welcome Highways England's proposals to build a dedicated holding area at Stanford West for approximately 3,600 HGVs. We also welcome the plans to provide overnight parking facilities for 500 HGVs when the holding area is not required to alleviate Operation Stack.

With regard to the specific consultation questions, the Borough Council would respond as follows:

#### **Question 1**

We have no specific comments with regard to the layout but it is clear that HGV parking will need to be clearly demarcated and carefully managed by site staff so as to avoid indiscriminate parking and the potential overrun of the verges, trees and shrubs within and around the site.

#### **Question 2**

Given the proximity of the site to the Kent Downs AONB we welcome the proposals to provide planting around the site and green corridors within, to screen the facility from nearby homes and the surrounding countryside. The issue of public rights of way, their implications for site security and the potential for conflict between non-motorised users and moving HGVs is clearly something which will require careful consideration as the detailed design proceeds.

#### **Question 3**

Lighting will be an important element in ensuring a safe and secure facility but the consultation document does not specifically comment on how light spill to the surrounding rural area will be controlled under the proposals.

#### **Question 4**

The exact internal circulation and signing and lining proposals are not clear from the visualisations produced but it is recognised that these will be worked up as part of the design process.

If public rights of way remain open except when Operation Stack is being alleviated this could pose challenges for site security.

The consultation document expects that overnight parking will be chargeable at a level which does not compete unfairly with commercial lorry parks such as the adjacent Stop 24 services. However, charges would limit the ability of the proposed facility to tackle inappropriate HGV parking in the rest of Kent. It is understood from the Freight Transport Association and Road Haulage Association that wages for many international HGV drivers are low, and in some cases they receive "running money" in the form of cash to pay for costs such as overnight stays. If they do not spend all of this cash, they may get to keep all or part of it at the end of their trip, and so there is a natural incentive to avoid overnight parking charges.

This highlights the need for the Stanford West proposals to be integrated with an overall strategy for a network of small lorry parks at suitable locations across Kent and a partnership approach with Districts and Kent Police to address enforcement, as identified in Kent County Council's Local Transport 4: Delivering Growth without Gridlock 2016 – 2031 (Consultation Draft). In so doing this will reduce the problems caused by inappropriate HGV parking, including unsafe parking, littering and damage to highway verges, which is a particular problem near the strategic road network around Maidstone as it is across Kent.

### **Question 5**

We support the provision of welfare facilities as proposed in the consultation document. It is assumed that the overnight parking spaces will be located within walking distance of the Stop 24 services, so that drivers can benefit from the food outlets there. Otherwise the facilities appear inadequate for a charged facility. They will need to be appropriately located and regularly maintained to encourage drivers to use the lorry park when not required to alleviate Operation Stack.

### **Question 6**

Regular reviews of lorry park operation are essential and they should include occupancy surveys to ensure that it functions as an attractive overnight parking facility for drivers and that it effectively addresses the problem of inappropriate HGV parking in the surrounding area.

### **Question 7**

We fully support the consideration of equality and diversity issues within the design process for the lorry park.

### **Question 8**

We are broadly supportive of the proposals. They will clearly alleviate the significant problems caused when Operation Stack is deployed, and so benefit residents and businesses in Maidstone and further afield. However, the proposals in respect of overnight parking require refinement to ensure that the facility is well used and so contributes effectively to addressing the problems caused by inappropriate HGV parking, which is a major problem near the strategic highway network around Maidstone as it is across Kent. The proposals must be taken forward alongside with a firm commitment to work with Kent County Council, Districts and Kent Police to deliver a network of small lorry parks across the county as well as effective HGV parking enforcement.

Yours faithfully



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