

# MANAGING FREIGHT VEHICLES THROUGH KENT - PUBLIC CONSULTATION REPORT

MARCH 2016

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# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1 The purpose of this document is to describe the non-statutory community and stakeholder consultation undertaken by Highways England on behalf of the Government to support the development of a case for a permanent lorry holding area as an alternative to Operation Stack.
- 1.1.2 The consultation process sought to engage local communities and other stakeholders to test the case for a permanent lorry holding area, so that the subsequent decision-making process takes into account, as far as possible, the public's views and opinions.
- 1.1.3 The document provides a summary of the 1,279 responses received during the '*Managing Freight Vehicles Through Kent*' consultation and an analysis of the main issues raised as part of this. The report will then allow Highways England to identify recommendations for the Government on how to proceed with appropriate proposals.

## 1.2 BACKGROUND

- 1.2.1 Delays at the Port of Dover and/or Eurotunnel, often caused by factors such as severe weather or disruption to services at the terminals, result in lorries being queued on the M20 in a procedure referred to as Operation Stack.
- 1.2.2 This procedure has, however, proved unsatisfactory to many stakeholders including residents, local businesses and in particular lorry drivers.
- 1.2.3 In response, in the 2015 Autumn Statement the Government set funds aside to develop a site for a permanent lorry holding area as an alternative to Operation Stack. Highways England then sought to test the case for the development of a new permanent lorry park to increase resilience on the road network in Kent.
- 1.2.4 In essence it is intended that lorries could wait their turn at such an off road facility to cross the Channel when capacity became available, resulting in fewer impacts on the surrounding national and local road networks and the communities they serve.

## 1.3 STAKEHOLDERS CONSULTED TO DATE

- 1.3.1 A wide variety of stakeholders including Shepway District Council (SDC), Kent County Council (KCC), The Kent Downs Area of Outstanding Natural Beauty (AONB) Unit, the Environment Agency (EA), Historic England and Natural England were consulted on the development of this case.
- 1.3.2 The consultation presented two potential sites for a permanent lorry area as set out in the '*Managing Freight Vehicles Through Kent*' document<sup>1</sup> (Appendix 1).

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<sup>1</sup> *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 – Highways England

## 1.4 NON-STATUTORY CONSULTATION

- 1.4.1 To test the case for a permanent lorry area and to understand the views of the community and other stakeholders, Highways England undertook a non-statutory public consultation between 11 December 2015 and the 26 January 2016. This was undertaken to engage with the public at an early stage and obtain their opinions. Two potential sites for a permanent lorry area were set out in the '*Managing Freight Vehicles Through Kent*' document provided. The public was given the opportunity to suggest 'alternative options' to Operation Stack as well as 'alternative sites' to those put forward as part of the public consultation documentation.
- 1.4.2 A series of public exhibitions were held between these dates in locations agreed with KCC and SDC to invite views from the public.
- 1.4.3 This document summarises and reports the responses received during the public consultation, including written/online Highways England Questionnaires as well as general submissions received from the public via post or e-mail.

## 1.5 POWERS TO DEVELOP A PERMANENT LORRY AREA

- 1.5.1 Following consideration of the outcomes of the non-statutory consultation discussed as part of this document, Highways England may be requested to develop a permanent lorry area as a long term solution to Operation Stack.
- 1.5.2 If it is required, Highways England will develop the permanent lorry area using powers available under Section 115 of the Highways Act 1980 subject to the requirements of Section 105A of the Highways Act 1980 (as amended). This requires that Highways England determines whether or not a project needs to be made the subject of Environmental Impact Assessment (EIA) before it considers whether to consent a project. The European Community (EC) Directive 2014/52/EU requires that EIA should be undertaken by the promoters of certain types of development to identify and assess the environmental consequences of projects before consent is given. The requirements for qualification for statutory EIA, and the process by which EIA should be undertaken are detailed within Directive 2014/52/EU, which revises Directives 85/337/EEC, and its amendments 97/11/EC, 2003/35/EC, 2009/31/EC and Directive 2011/92/EU, collectively referred to as the 'EIA Directives'.
- 1.5.3 Due to the application of Part 9 of the Town and Country Planning (General Permitted Development) Order 2015 the Highways Act procedures replace the need for a planning permission under the Town and Country Planning Act.
- 1.5.4 It is expected that a full Environmental Impact Assessment Report (EIAR) will need to be prepared, if a preferred site for a permanent lorry park is progressed, in line with the above to assist the Secretary of State (SoS) in the final decision process.
- 1.5.5 In order to facilitate any future EIA process, the methodology for any potential EIA and the topics to be assessed were determined by the completion of an EIA Scoping Report prepared by WSP/ Parsons Brinckerhoff in December 2015. The Scoping Reports were based on the two proposed site options put forward as part of the non-statutory consultation and were sent to the statutory environmental bodies and other environmental stakeholders in December 2015.



## 1.6 FUTURE CONSULTATION

- 1.6.1 As part of any future EIA process a statutory consultation will be undertaken. This will most likely take place in late spring 2016 following the decision of the Secretary of State (SoS) on a preferred option.
- 1.6.2 This statutory consultation is likely to include a greater level of design detail including site layout and potential operational models of any preferred site, along with any associated necessary highway works to be undertaken.

# 2 GOVERNMENTS CODE OF PRACTICE ON CONSULTATION

- 2.1.1 The consultation was conducted in accordance with the Governments Consultation Principles as follows:

- Consultations should be clear and concise;
- Consultations should have a purpose;
- Consultations should be informative;
- Consultations are only part of a process of engagement;
- Consultations should last for a proportionate amount of time;
- Consultations should be targeted;
- Consultations should take account of the groups being consulted;
- Consultations should be agreed before publication;
- Consultation should facilitate scrutiny;
- Government responses to consultations should be published in a timely fashion; and
- Consultation exercises should not generally be launched during local or national election periods.

- 2.1.2 Further information about the Consultation Principles can be located on Gov.UK website<sup>2</sup>

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<sup>2</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/492132/20160111\\_Consultation\\_principles\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf)

# 3

## CONDUCTING THE CONSULTATION EXERCISE

### 3.1 WHAT THE CONSULTATION WAS ABOUT?

- 3.1.1 The consultation documentation (Section 3.3 below) set out the background to the consultation including the current traffic management response to delays at the Port of Dover and Eurotunnel, including Operation Stack and Dover Traffic Assessment Project (TAP).
- 3.1.2 Responses were invited from the community and other stakeholders on the general proposition of providing a permanent off-road solution to Operation Stack in the form of a lorry holding area and the suitability of two potential sites for this. The public were also encouraged to suggest 'alternative options' to Operation Stack as well as 'alternative sites' to those put forward as part of the public consultation documentation.
- 3.1.3 The consultation also included four alternative operational models for the sites, and invited comments on details of use within those.
- 3.1.4 The option to continue to rely on Operation Stack, rather than pursue the construction of a permanent off-road solution, was also consulted on.

### 3.2 HOW THE CONSULTATION WAS CONDUCTED?

- 3.2.1 The consultation was undertaken between the 11 December 2015 and the 26 January 2016. Advertisements in the local and national press informed the community and other stakeholders of the consultation documentation, as well as informing them of a number of public exhibitions where they could find out more and have any questions answered directly by members of the project team.
- 3.2.2 A number of press releases were prepared with a media launch held on the 11 December at the Sellindge Sports and Social Club, with a further media conference held at the Stanford Depot to inform members of the local and national media.
- 3.2.3 1,000 letters informing people of the public consultation were delivered to residents in nearby settlements considered to have a direct interest in the proposed site options.
- 3.2.4 A further 300 local stakeholders were e-mailed directly with an invitation to participate in the consultation.
- 3.2.5 A number of 'deposit points' i.e. local councils, libraries, lorry parks, parish councils (listed in Appendix 2), were also e-mailed with a 'poster' (Appendix 2) setting out details of the public consultation.
- 3.2.6 All parties with views on the proposals were encouraged to make contact with Highways England.

### 3.3 CONSULTATION DOCUMENTATION

3.3.1 A public consultation document (*Management of freight vehicles through Kent* - Appendix 1), a set of Frequently Asked Questions (Appendix 3) and a softcopy of the Highways England Questionnaire (Appendix 4) were made available on the Highways England project website<sup>3</sup> as well as in hardcopy format at the public information exhibitions.

3.3.2 An online version of the Highways England Questionnaire was also made available through the project website.

#### INFORMATION PROVIDED

3.3.3 Respondents were asked to consider the following information:

- The sites location - Two potential sites were put forward:
  1. Stanford West; and
  2. Junction 11 North (Figure 3.1)

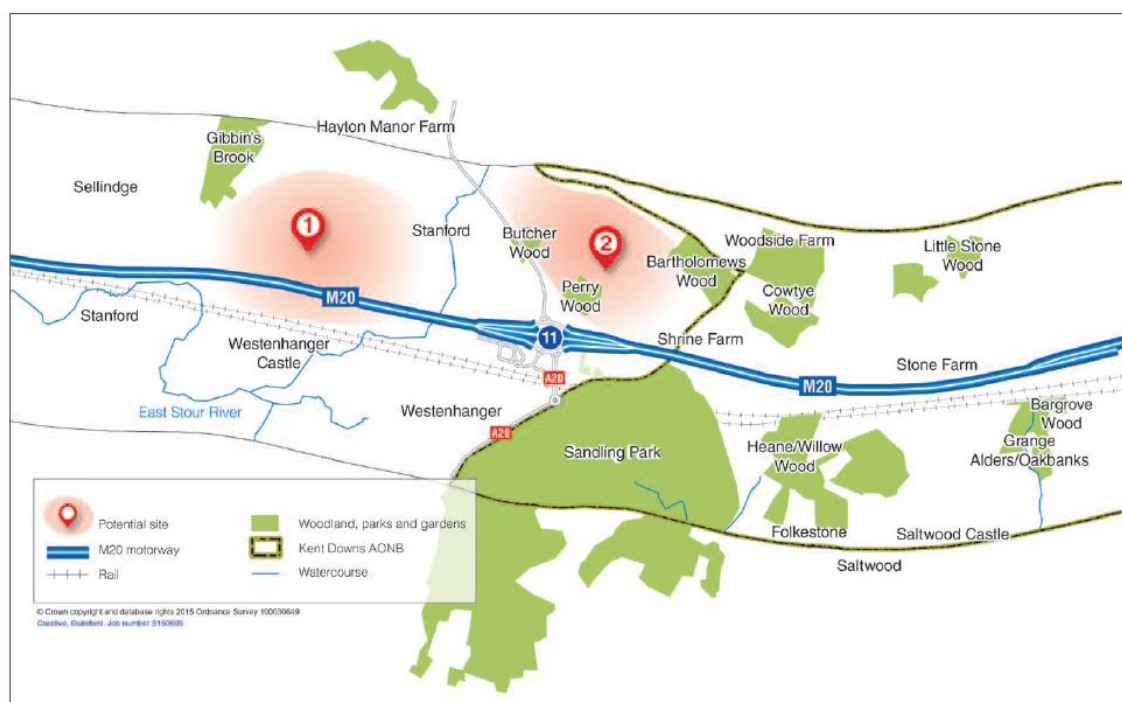
3.3.4 The information set out the perceived advantages and disadvantages for each site. Suggestions for alternative sites to these were also invited as part of the consultation as well as the following information:

- Comments on alternative operational uses of any potential site were requested based on four main alternatives:
  1. Emergency lorry holding area which reduces or removes the need for Operation Stack only (Alternative 1);
  2. 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 (Alternative 2);
  3. Emergency lorry holding area as above (with free parking provision for Operation Stack and Dover Tap/Eurotunnel excess) but with additional chargeable basic overnight parking (Alternative 3); and
  4. Emergency lorry holding area as above, with free parking provision for Operation Stack and Dover TAP/Eurotunnel excess but with additional chargeable overnight parking and 24 hour lorry focused motorway service area facilities including hot food and drink (Alternative 4).

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<sup>3</sup> <https://www.gov.uk/government/consultations/management-of-freight-vehicles-through-kent>

Figure 3.1 – Potential Sites



3.3.5 The aim of the consultation documentation and public information exhibitions was to obtain public opinion regarding the two potential site options and the alternative operational uses of these. It also allowed the public to put forward additional 'alternative options' or 'alternative sites' as well as the option to maintain Operation Stack as it currently operates.

3.3.6 Responses were accepted online, via e-mail, by post or by filling in hard copy responses at the public information exhibitions, allowing the public to comment on all the proposed options. An online survey address, return postal address and dedicated e-mail were provided in the above documents. The Highways England Customer Information Line phone number was also provided.

3.3.7 A Diversity Survey for use when submitting written comments was also provided (Appendix 5).

## 3.4 PUBLIC INFORMATION EXHIBITIONS

3.4.1 A number of staffed public information exhibitions were also held. All details of exhibitions were made available via the project website and local press with the exhibitions undertaken at the locations and times set out in Table 3.1:

Table 3.1: Public Exhibition Times and Locations

Saturday 12 December 2015	12pm to 6pm	Sellindge Sports and Social Club, 69 Swan Lane, Sellindge, Ashford, Kent, TN25 6HB
Monday 14 December 2015	2pm to 8pm	
Monday 4 January 2016	2pm to 8pm	Civic Centre, Shepway District Council, Castle Avenue, Folkestone, Kent CT20 2QY
Tuesday 5 January 2016	2pm to 8pm	

Wednesday 6 January 2016	2pm to 8pm	The New Ashford Market, Monument Way Orbital Park, Ashford, Kent TN24 0HB
Thursday 7 January 2016	2pm to 8pm	Dover Town Hall, Maison Dieu Place, Biggin Street, Dover, Kent CT16 1DL
Monday 11 January 2016	2pm to 8pm	Sellindge Sports and Social Club, 69 Swan Lane, Sellindge, Ashford, Kent, TN25 6HB
Tuesday 12 January 2016	2pm to 8pm	Hawkinge Community Centre, Hawkinge, CT18 7FP

- 3.4.2 At the exhibitions, display boards setting out all of the information discussed above and included in '*Managing freight vehicles through Kent*' documentation were on display. Representatives from the Highways England project team and its professional advisers were on hand to discuss the proposals and answer specific questions. All the consultation documentation noted above was made available at the exhibitions, with the project team accepting written responses to both the questionnaire and more general written comments.

### ATTENDANCE RECORD

- 3.4.3 An attendance record was kept at each public exhibition with the attendees asked to provide their name, address and postcode. This was undertaken to establish which sectors of the population were in attendance and allowed further contact to be made if requested by the respondent. Over 1,000 members of the public attended the public exhibitions over the eight days.
- 3.4.4 The overwhelming majority of those visiting identified themselves as local residents. The remaining attendees were a mixture of business owners and local councillors.

# 4 RESPONSES

## 4.1 FORMAT OF RESPONSES

- 4.1.1 Attendees at the public information exhibitions were provided with the opportunity to ask questions directly of the project team (Highways England, WSP | Parsons Brinckerhoff and Balfour Beatty Mott Macdonald) and provide responses by filling in hard copies of the Highways England questionnaire. These are assessed as part of the overall responses to the Highways England questionnaires.
- 4.1.2 Written responses to the consultation were also accepted online, via e-mail or by post and consisted of direct responses to the Highways England questionnaire as well as more general comments/submissions.
- 4.1.3 A summary of all the responses received and the general issues raised are discussed below.
- 4.1.4 The questions in the printed questionnaires and the online questionnaires had minor differences in the wording and this is identified below in the appropriate question. It should also be noted that, where questions were multiple choice, the online questionnaire limited answers to one choice but there were no limitations in the printed questionnaires.

## 4.2 RESPONSES TO HIGHWAYS ENGLAND QUESTIONNAIRE

- 4.2.1 The Highways England Questionnaire (Appendix 4) consisted of 14 questions across 4 sections, including:
1. *Information about you;*
  2. *Current Operation Stack;*
  3. *Proposed Lorry Area; and*
  4. *Any Other Comments*
- 4.2.2 The following questions, which offered multiple choice options, options to rank in order of preference or more general responses, were included as follows:
1. *How did you find out about the consultation? (Multiple Choice)*
  2. *What best describes your interest in filling out this questionnaire today? (Multiple Choice)*
  3. *However often do you use any part of the M20 or A20 between Maidstone and Dover? (Multiple Choice)*
  4. *How are you personally affected when Operation Stack operates? (Multiple Choice)*
  5. *Do you agree that the current Operation Stack should remain the main response to major disruption to cross channel traffic? (Multiple Choice)*
  6. *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)*

7. *How many lorries do you consider that any ('the' in online version) lorry area should be able to accommodate at any given time? (Multiple Choice)*
8. *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 more important and 12 being least. (Ranking a number of options)*
9. *Four main ('several' in online version) alternatives ('options' included here in online version) are under consideration for the way any ('the' in online version) lorry area could operate. Please rank these alternatives in order of preference, with 1 being your most favoured and 4 being your least favoured? (Ranking a number of options)*
10. *If you have any comments regarding the effects that any of the alternative 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.*
11. *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)*
12. *Do you agree that a lorry area would address the current traffic problems on the M20?*
13. *Which site would you like to see progressed? (Multiple Choice)*
14. *If you have any comments you would like us to take into account, please use the space provided below.*

## 4.3 RESPONSES RECEIVED

4.3.1 During the consultation the following numbers of responses were received (1,279 in total):

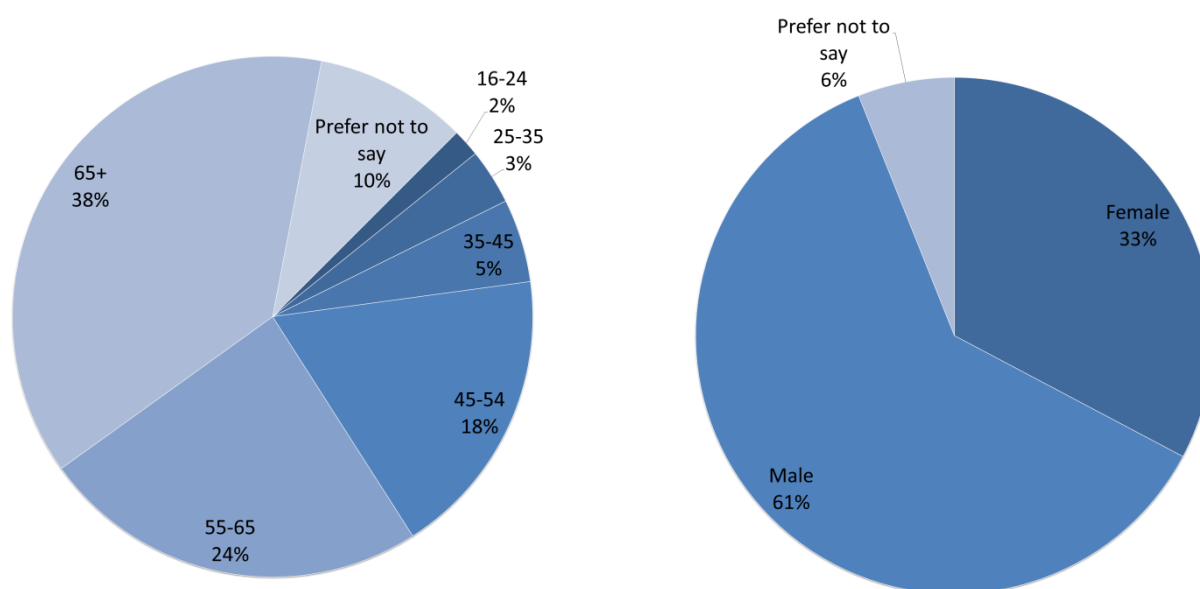
- 807 online versions of the questionnaires;
- 210 written questionnaires (or written responses which addressed the questionnaire);
- 262 general comments via e-mail or letter; and
- 134 Diversity questionnaires. Appendix 6 shows the geographic spread of the responses received based on the postcodes provided as part of the responses (where provided). Although responses to the consultation were received from around the UK, it can be seen that the majority of responses were received from the Kent area with Dover, Folkestone, Ashford and the communities close to the proposed permanent lorry area sites (the towns of Stanford and Sellindge) and along the M20 being notably highest.

4.3.2 The above included a number of detailed responses from local/regional/national group/businesses including the parish councils, formal organisations, statutory environmental bodies (the Environment Agency, Natural England, Historic England, Kent Downs AONB unit), Shepway District Council and Kent County Council. A full list of these is provided in Appendix 7.

## 4.4 INFORMATION ABOUT RESPONDENTS

4.4.1 Information on respondents was requested as part of the Diversity Survey (Appendix 5) for monitoring purposes. This information was used to evaluate the effectiveness of the consultation in engaging as many people as possible. 116 respondents filled out the diversity survey, with the majority of these being male (61%) and the most common age range being 65+ (38%). The overwhelming majority of respondents described their national identity as 'British' or 'English'.

FIGURE 4.1: AGE AND GENDER BREAKDOWN OF RESPONDENTS

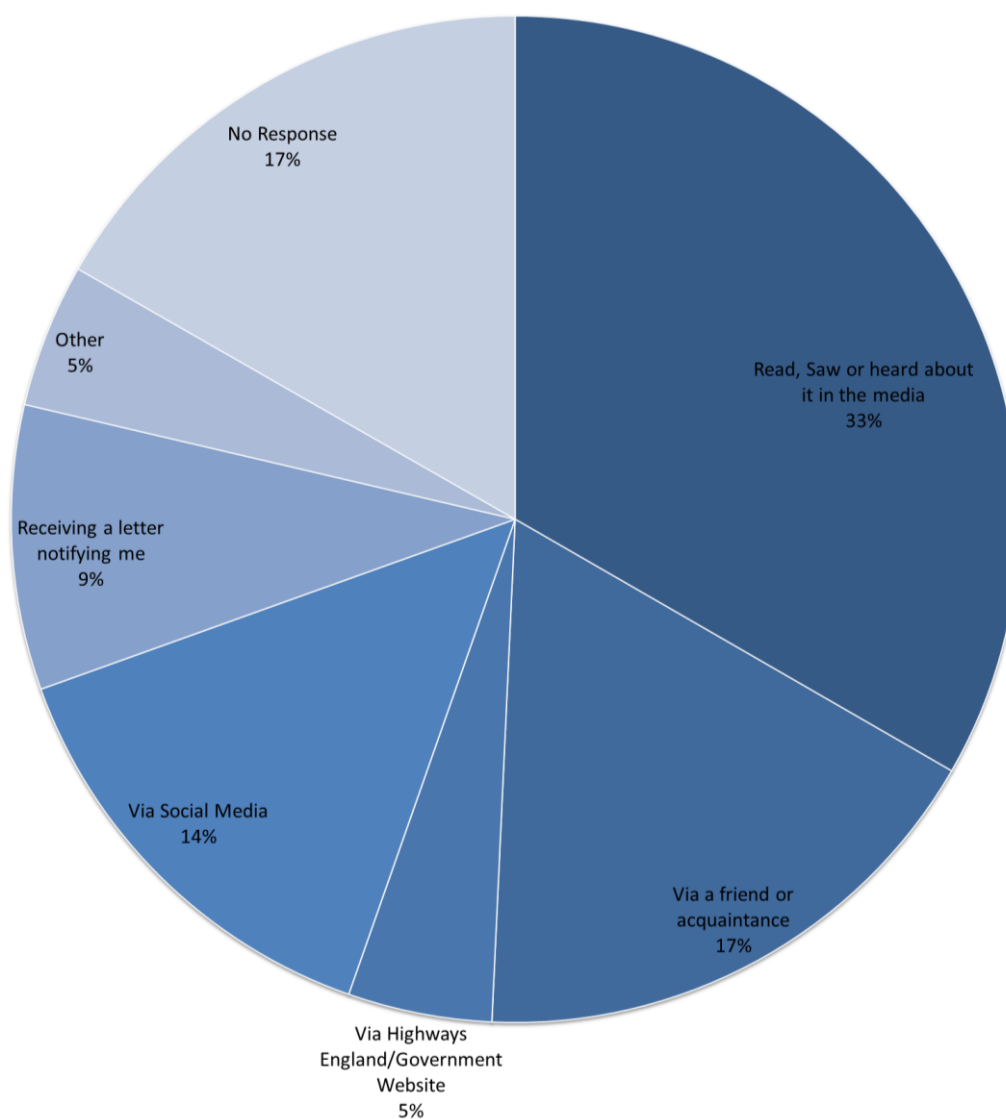


## 4.5 RESPONSE ANALYSIS

- 4.5.1** All responses received were entered into a spread sheet allowing the multiple formats to be analysed in a holistic manner. This included the online questionnaire responses, written questionnaire responses and more general submissions from the public and other formal bodies.
- 4.5.2** Where, as part of the multiple choice answers on the written questionnaires, respondents have ticked more than one choice, these have all been included within the analysis as respondents were not asked to select only one option. The ability to select only one option was available to the online respondents. This in large is confined to questions 1 to 4 on the written questionnaire which are concerned with information on the respondents and how Operation Stack affected them personally. This has been taken into account when analysing the responses and it is not considered to have introduced a bias to the outcomes of the consultation. The responses appear broadly consistent from both the online and written formats in this respect. The results of the responses, including a percentage breakdown for each multiple choice answer or weighted average 'score' for questions which required a ranking are provided below.
- Q1 - HOW DID YOU FIND OUT ABOUT THE CONSULTATION? (MULTIPLE CHOICE)**
- 4.5.3** The results of question one regarding how respondents found out about the consultation are shown in Figure 4.2 below.
- 4.5.4** The results show that the majority of respondents (33%) found out about the consultation by reading, seeing or hearing about it in the media, with 17% finding out via friends or acquaintances.
- 4.5.5** 17% of respondents chose not to answer this question.



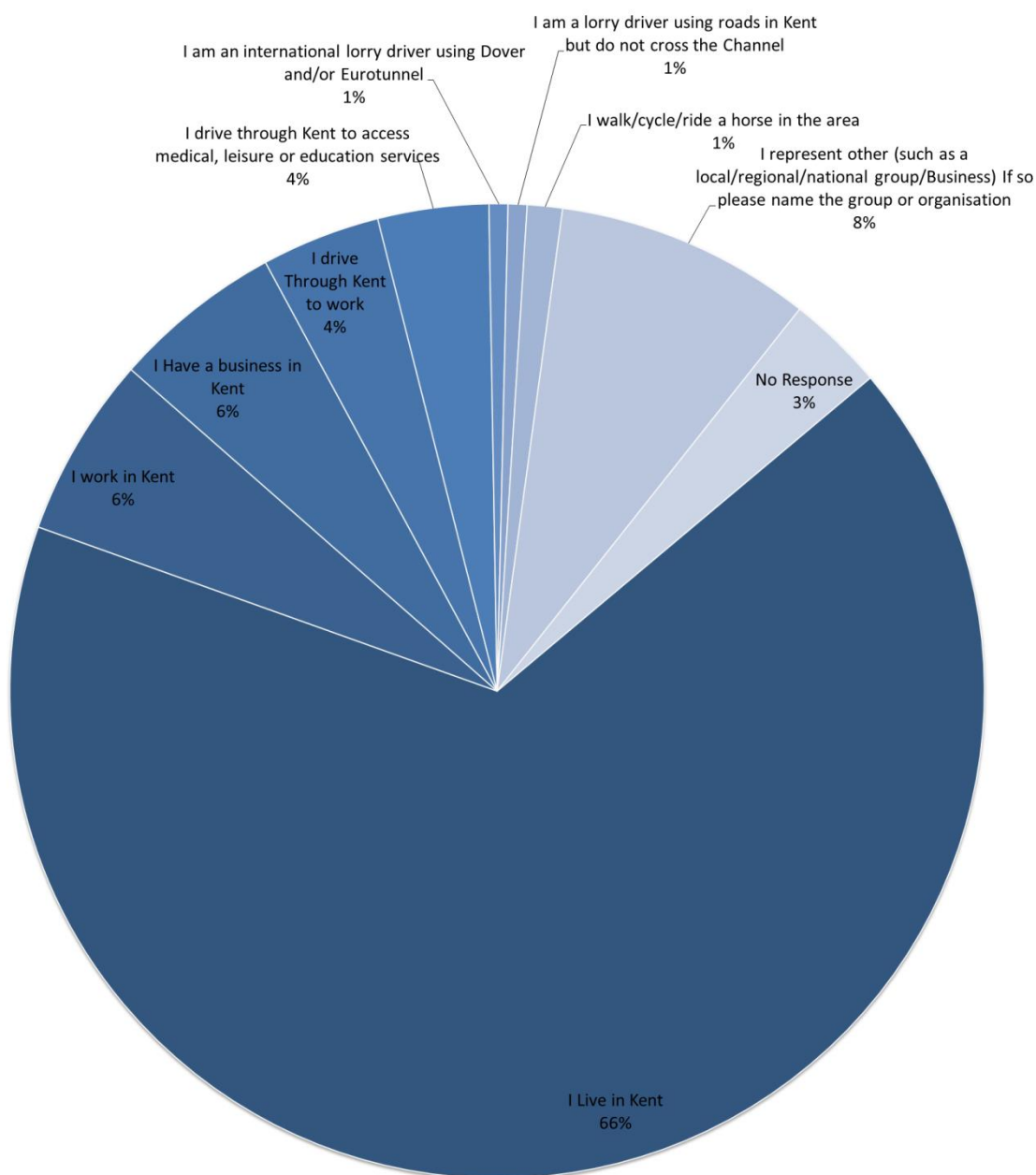
Figure 4.2 – Q1 How did you find out about the consultation?



## Q2 - WHAT BEST DESCRIBES YOUR INTEREST IN FILLING OUT THIS QUESTIONNAIRE TODAY? (MULTIPLE CHOICE)

- 4.5.6 The results of question two regarding what best described the respondent's interest in the consultation are shown in Figure 4.3 below.
- 4.5.7 The results show that the majority of respondents describe their interest as living in Kent (66%) or working/having a business in Kent (both 6%).
- 4.5.8 8% represented a local/regional/national group/business. A full list of these respondents is provided at Appendix 7.
- 4.5.9 3% of respondents chose not to answer this question.

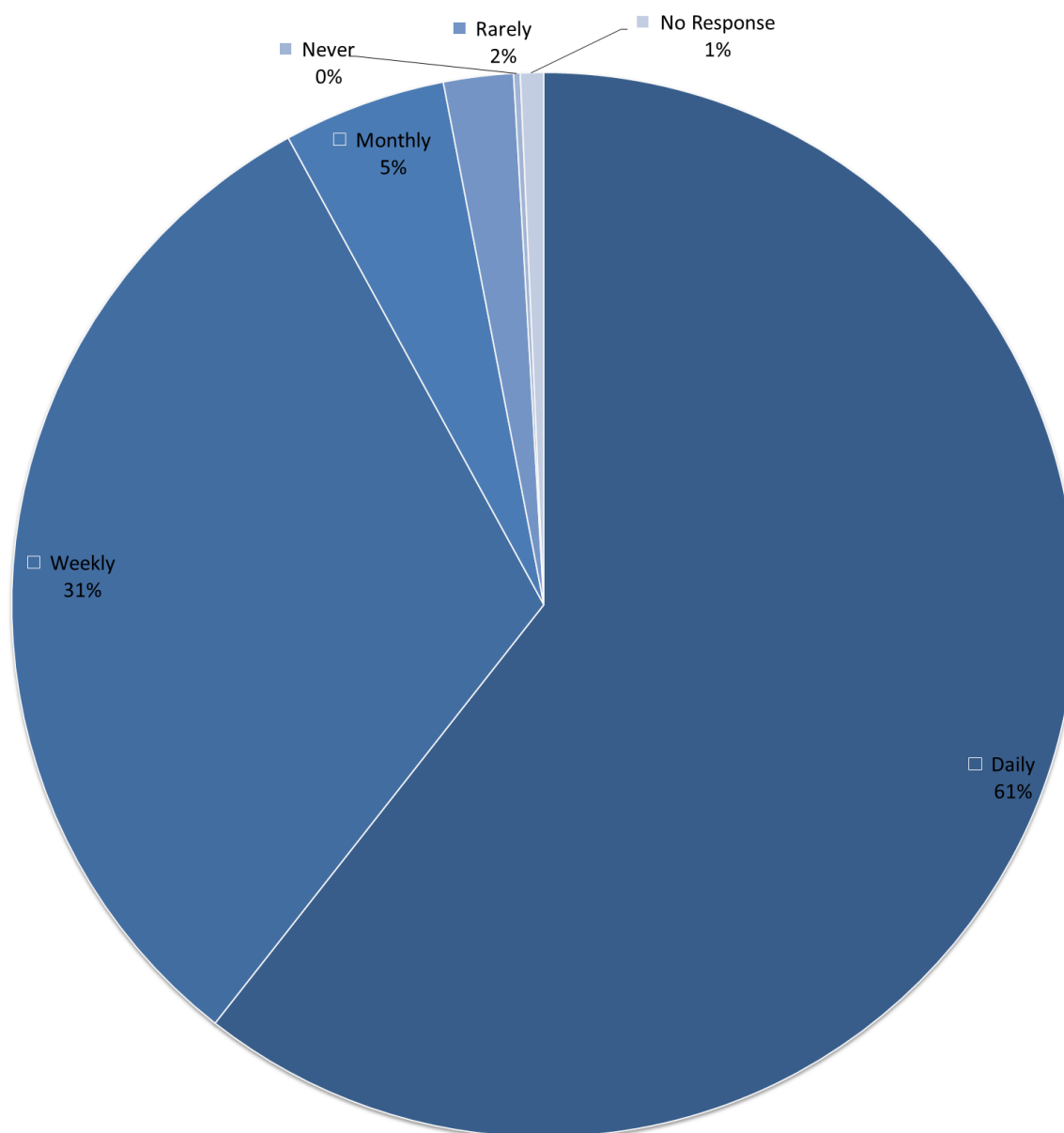
**Figure 4.3 - Q2 What best describes your interest in filling out this questionnaire today?**



### Q 3 - HOW OFTEN DO YOU USE ANY PART OF THE M20 OR A20 BETWEEN MAIDSTONE AND DOVER? (MULTIPLE CHOICE)

- 4.5.10 The results of question three regarding how often respondents used any part of the M20 or A20 between Maidstone and Dover are shown in Figure 4.4 below.
- 4.5.11 The results show that the majority of respondents (61%) use these routes daily with a further 31% using them at least weekly.
- 4.5.12 1% of respondents chose not to answer this question.

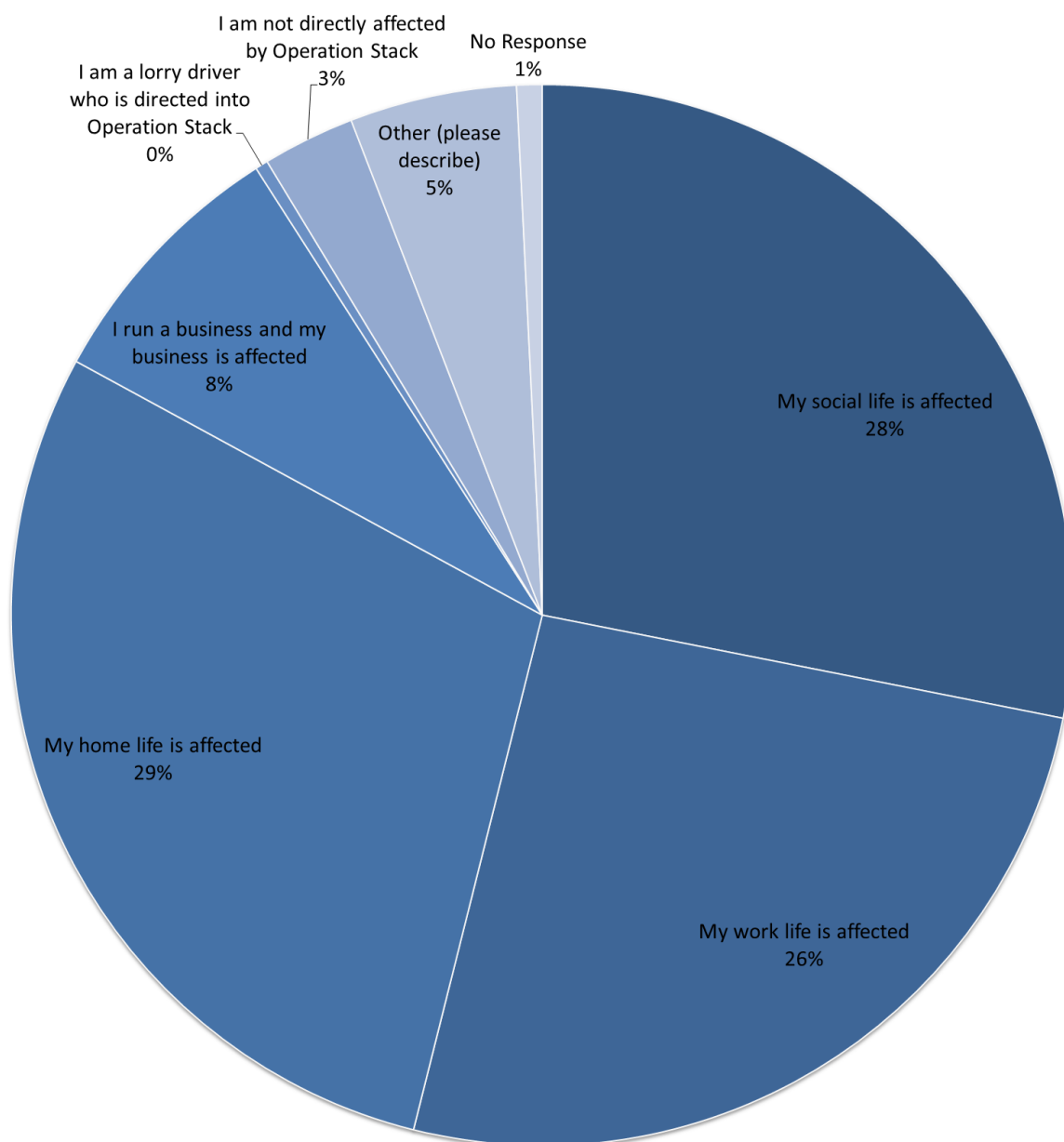
**Figure 4.4 - Q 3 How often do you use any part of the M20 or A20 between Maidstone and Dover?**



#### Q 4 - HOW ARE YOU PERSONALLY AFFECTED WHEN OPERATION STACK OPERATES? (MULTIPLE CHOICE)

- 4.5.13 The results of question four regarding how respondents were personally affected by Operation Stack are shown in Figure 4.5 below.
- 4.5.14 The results show that the largest majority of respondents (29%) stated that their home life was affected, with respondent's social lives (28%) and work life (26%) also affected.
- 4.5.15 1% of respondents chose not to answer this question.

**Figure 4.5 - Q 4 How are you personally affected when Operation Stack operates?**



## 4.5.16

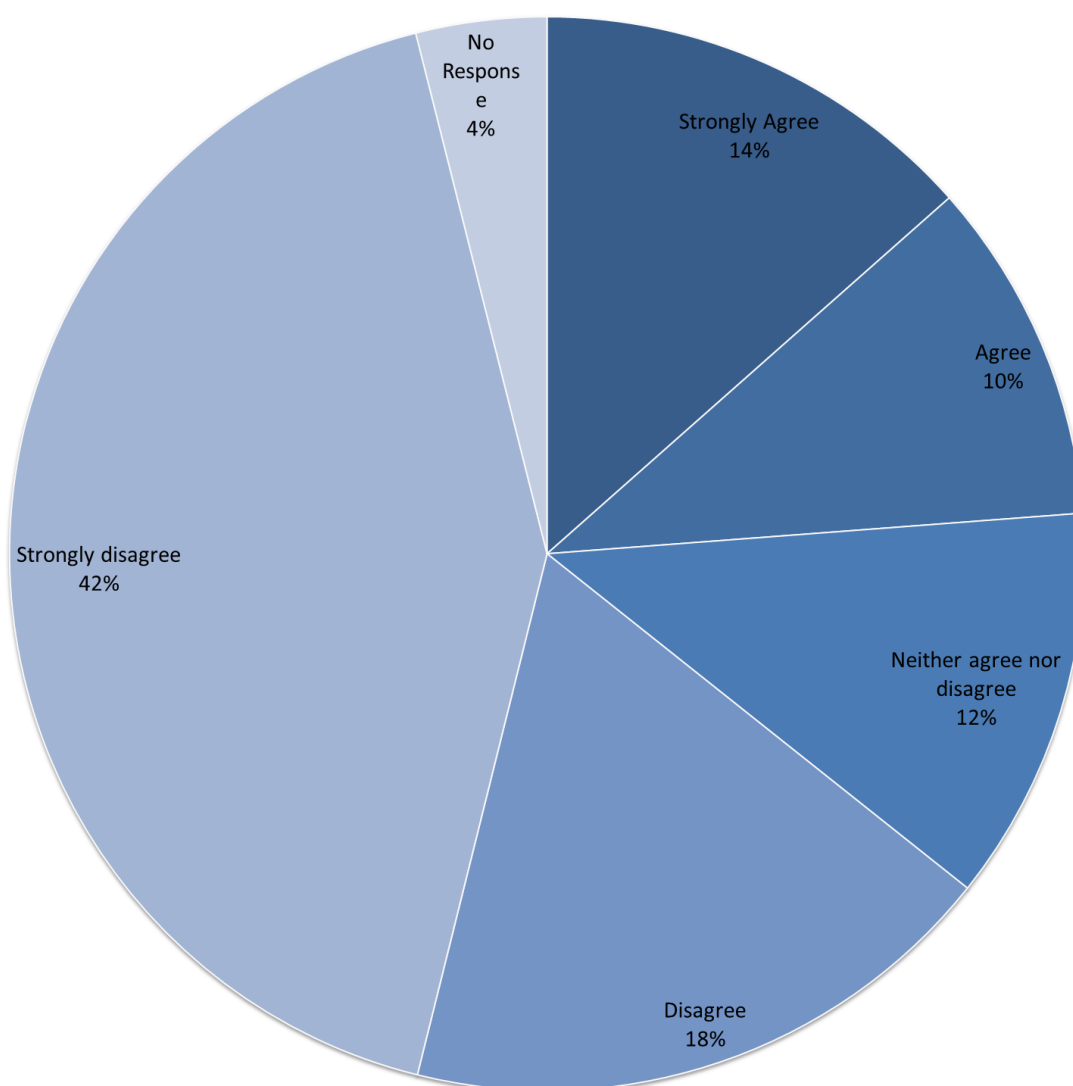
Some specific examples of how respondents were personally affected are provided below:

- *'Junction 11 is gridlocked when stack is on and you can't get anywhere without major delays. Adding a lorry park into the mix will only make things a lot worse'*
- *'When stack is in operation I am late for work, late for social events, and late home from work. The situation can change rapidly within the space of a few hours. Planning journey times is impossible'.*
- *'Living in Sellindge, the A20 becomes very congested during Operation Stack, affecting my home and my work life, as with the rest of the other residents of Sellindge'.*
- *'I commute on the A20 daily to work in Dover and my work as a Surveyor requires frequent travel on the main roads into and out of Dover that are adversely affected by Operation Stack and Harbour traffic in general'.*
- *'Highways and local Councils who pay for the police etc. are paid for by the local community. Our lives are disrupted and it has also come to notice that the air pollution is killing the people of Kent. The laws should be enforced that it is illegal to park on a motorway. If there is queuing up to use a private enterprise like the ferry or tunnel crossing then they should pay for the parking area to be purchased and managed. If not go to another port along the coast. People in Kent have our lives disrupted and spend more money on transport cost and keeping pollution down and suffer more ill health. There is always alternative transport like air freight, train and other ports. Could you imagine the disruption if people were allowed to park on the road around Gatwick, Heathrow etc. Fine the drivers heavy for parking on the motorway. I would be fined if I had to stop for a toilet break'.*

### Q 5 - DO YOU AGREE THAT THE CURRENT OPERATION STACK SHOULD REMAIN THE MAIN RESPONSE TO MAJOR DISRUPTION TO CROSS CHANNEL TRAFFIC? (MULTIPLE CHOICE)

- 4.5.17 The results of question five which asked respondents if they agreed with Operation Stack remaining as the main response to major disruption to cross channel traffic are shown in Figure 4.6 below.
- 4.5.18 The results show that the largest majority of respondents (42%) strongly disagreed with the current Operation Stack remaining with an additional 18% also disagreeing.
- 4.5.19 The geographic spread of the respondents that strongly agreed/agreed versus those that strongly disagreed/disagreed was examined. It is considered that there is generally no geographic bias to these responses.
- 4.5.20 4% of respondents chose not to answer this question.

**Figure 4.6 - Q 5 Do you agree that the current Operation Stack should remain the main response to major disruption to cross channel traffic?**



## 4.5.21

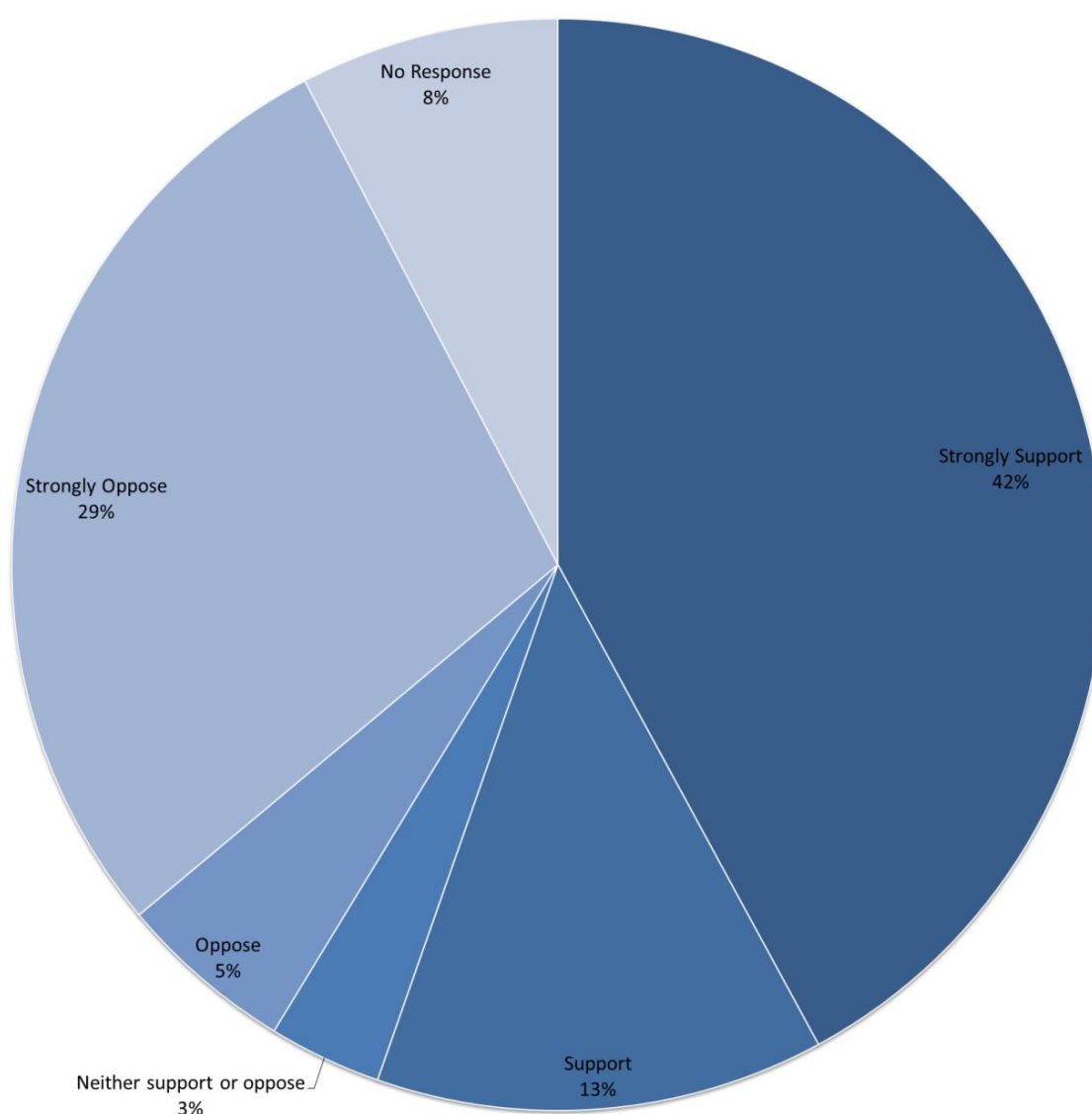
Some specific examples of why respondents either disagreed or agreed with the statement in question five are provided below:

- *'Operation stack is a disaster! It creates a block to usual traffic and should never have been used'.*
- *'I don't like the proposed alternatives to stack, plus I would like the issues that cause it resolved before building lorry parks. I also wonder if the stack could be managed better when it does occur'.*
- *'As you state, prior to 2015 Operation Stack was only used for a few days a year. It can be argued that there is no clear evidence that the 2015 pattern is likely to continue into the foreseeable future. You are planning as a worst case scenario and also taking this as opportunity to introduce very enhanced facilities'.*
- *'Because the planned lorry park will cause more and more local congestion for all the local villages and people trying to use Stone St. Especially Stafford, Sellindge and Lympne. Two local wedding venues were and will be badly affected. There needs to be parking facilities back over on all motorways. Not another bottleneck to replace Stack'.*
- *'In my opinion this is a satisfactory solution, on the odd occasion it would normally be required two or three times a year'.*
- *'I do not think this corner of Kent should shoulder the entire burden of the issue. The causes needs addressing, not the symptoms. The Channel Tunnel and the Port of Dover surely should not be the only real options for freight'.*

## Q 6 - 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?

- 4.5.22 The results of question six which asked respondents if they supported or opposed a permanent lorry area are shown in Figure 4.7 below.
- 4.5.23 The results show that the largest majority of respondents (42%) strongly support the provision of a permanent lorry area with a further 13% supporting it.
- 4.5.24 A sizeable percentage of respondents (29%) however strongly oppose the provision of a permanent lorry park, with a further 5% opposing it.
- 4.5.25 8% of respondents chose not to answer this question.

**Figure 4.7 - Q 6 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?**





## 4.5.26

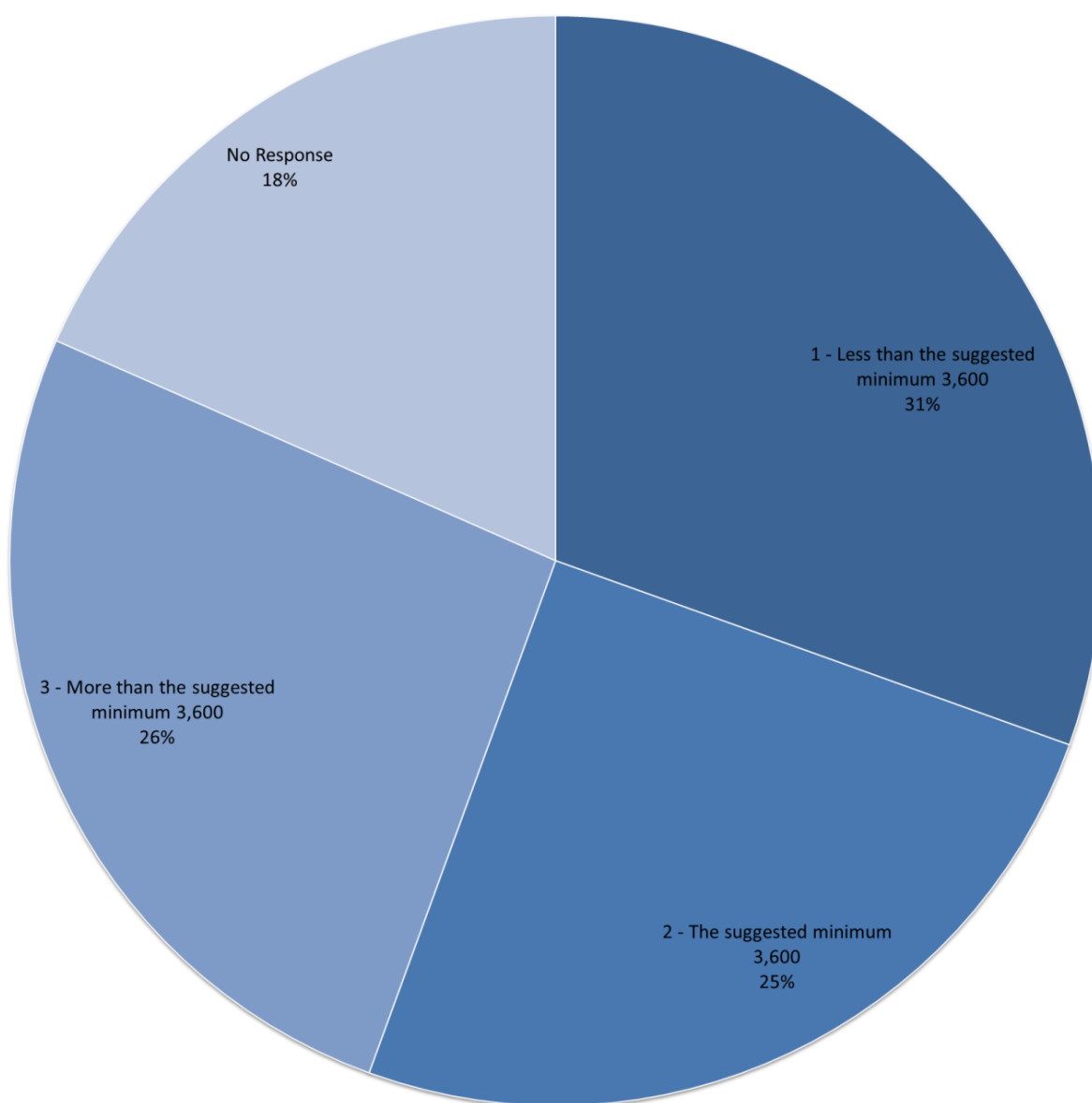
Some specific examples of why respondents either supported or opposed the provision of a permanent lorry area are provided below:

- *'A permanent lorry area will ensure the M20 will remain open for the free flow of international, national and local traffic, if supported by the right management scheme with intelligent signage on the M20. It is an opportunity to develop further lorry parking to alleviate the problem of indiscriminate lorry parking in unsuitable areas such as local roads, verges, housing estates'.*
- *'A further option should be considered. This option is for a number of small permanent lorry parks where lorry movements are managed by Highways England. This would be coupled with an on-line pre-booking scheme for lorries'.*
- *'This would reduce the need for Operation Stack, and potentially reduce the occurrences of fly-parking, which are definitely on the rise through Kent'.*
- *'We believe that the solution should remain on the motorway. Additional lanes and better signage would keep traffic pointed in the right direction, in order of arrival'.*

## Q7 - HOW MANY LORRIES DO YOU CONSIDER THAT ANY LORRY AREA SHOULD BE ABLE TO ACCOMMODATE AT ANY GIVEN TIME?

- 4.5.27 The results of question seven, which asked respondents how many lorries any permanent lorry area should be able to accommodate at any given time, are shown in Figure 4.8 below.
- 4.5.28 The results show that the largest percentage of respondents (31%) consider that less than the suggested 3,600 be accommodated.
- 4.5.29 It is noted however that similar percentages of respondents (25% and 26%) consider the suggested minimum or more than the suggested minimum of 3,600.
- 4.5.30 18% of respondents chose not to answer this question.

**Figure 4.8 - Q7 HOW MANY LORRIES DO YOU CONSIDER THAT ANY LORRY AREA SHOULD BE ABLE TO ACCOMMODATE AT ANY GIVEN TIME?**



## 4.5.31

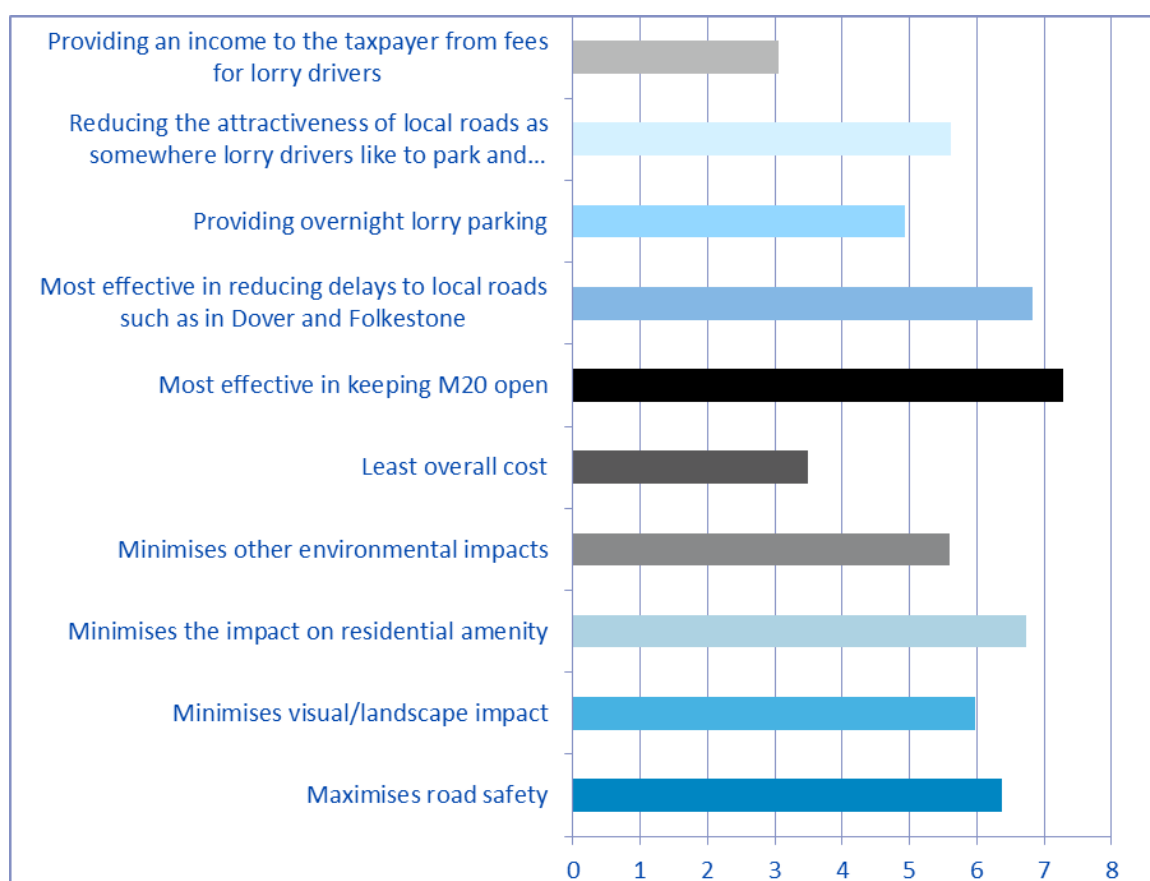
Some specific examples of why respondents suggested the above are provided below:

- *'Needs to be a sizeable development to cover issues but the causes should be tackled too - often these have been migrant or strike based rather than weather / acts of god'.*
- *'It will never be enough with 6% growth will not be enough before built'.*
- *'A series of smaller locations would lessen environmental impacts and damage to communities'*
- *'Highways England's is proposal is too large. A much smaller lorry park would substantially reduce the impact on local people and businesses. The environmental impact would be reduced. There would be less pollution from a smaller area'.*
- *'It should be strictly EMERGENCY only and there should be a more modern solution to reducing the number of lorries approaching the shuttle/ferry when there is known disruption'.*

**Q8 - IF SUCH A FACILITY IS BUILT, WHAT WOULD BE YOUR PRIORITIES IN CHOOSING A SITE LOCATION? PLEASE RANK 1 TO 10 ACCORDING TO YOUR PREFERENCE, WITH 1 BEING MOST IMPORTANT AND 10 BEING LEAST – (ONLINE QUESTIONNAIRE)<sup>4</sup>**

- 4.5.32 The results of question eight (online questionnaire), which asked respondents their priorities in choosing a site location are shown below in Figure 4.9. This figure shows the highest ranked preferences in graphical format<sup>5</sup>.
- 4.5.33 The responses were generally evenly spread across the options with costs and an income for the taxpayer being the least important to respondents.
- 4.5.34 Most effective in keeping the M20 open was the highest ranked priority and minimising the impact of any site on residential amenity also noted as a high priority. Road safety also ranked highly.

**Figure 4.9 - Q8 IF SUCH A FACILITY IS BUILT, WHAT WOULD BE YOUR PRIORITIES IN CHOOSING A SITE LOCATION? PLEASE RANK 1 TO 10 ACCORDING TO YOUR PREFERENCE, WITH 1 BEING MOST IMPORTANT AND 10 BEING LEAST**



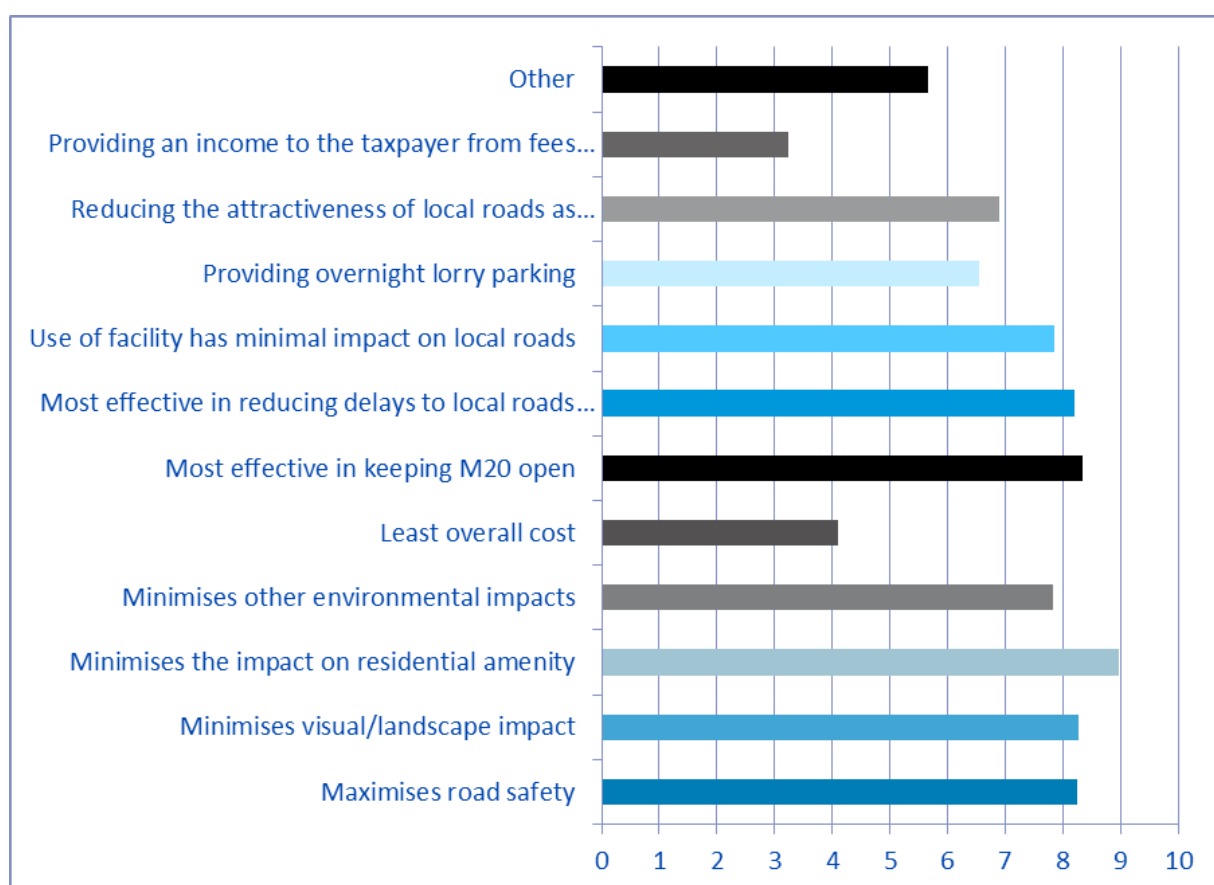
<sup>4</sup> Please note that the ranking system and options provided differed from the written questionnaire

<sup>5</sup> [http://help.surveymonkey.com/articles/en\\_US/kb/What-is-the-Rating-Average-and-how-is-it-calculated](http://help.surveymonkey.com/articles/en_US/kb/What-is-the-Rating-Average-and-how-is-it-calculated)

**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 MORE IMPORTANT AND 12 BEING LEAST - (WRITTEN QUESTIONNAIRE)<sup>6</sup>**

- 4.5.35 The results of question eight (written questionnaire), which asked respondents their priorities in choosing a site location are shown below in Figure 4.10<sup>7</sup>.
- 4.5.36 The responses were again generally evenly spread across the options with costs and an income for the taxpayer being again the least important to respondents.
- 4.5.37 Similar to the online questionnaire minimising the impact on residential amenity and keeping the M20 open were high ranking priorities. Road safety also ranked highly.

**Figure 4.10 - 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 MORE IMPORTANT AND 12 BEING LEAST**



<sup>6</sup> Please note that the ranking system and options provided differed from the written questionnaire

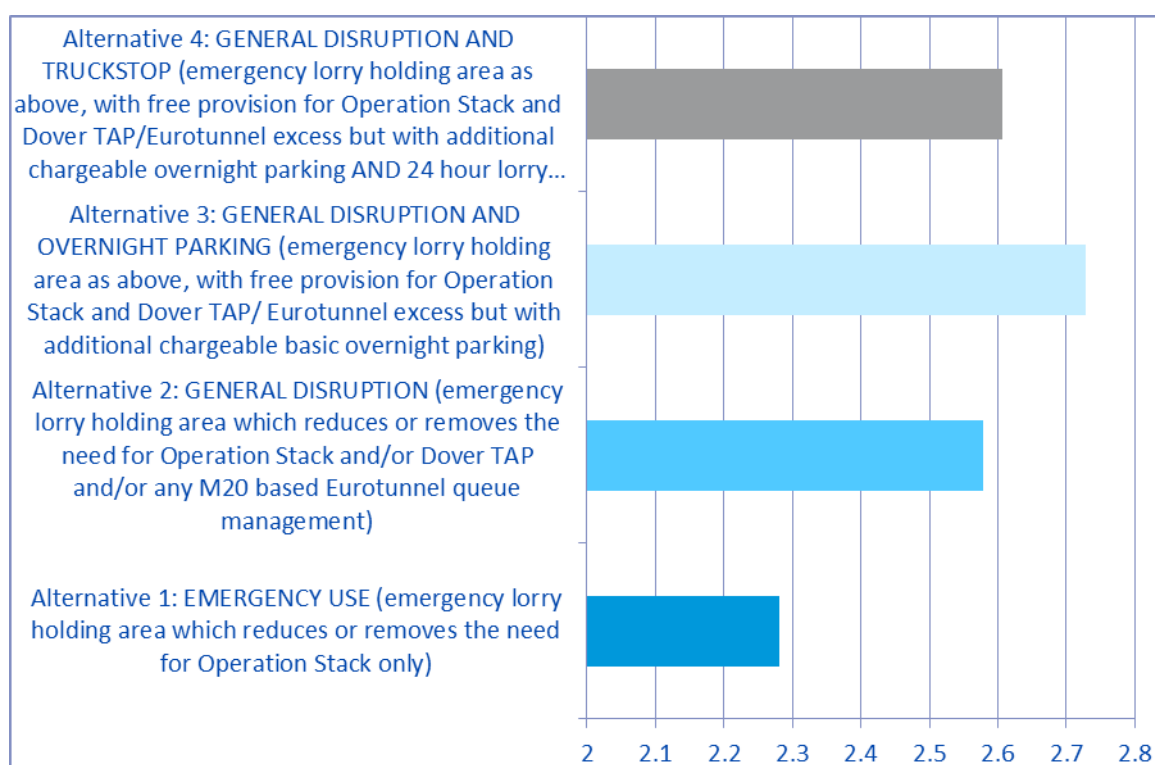
<sup>7</sup> [http://help.surveymonkey.com/articles/en\\_US/kb/What-is-the-Rating-Average-and-how-is-it-calculated](http://help.surveymonkey.com/articles/en_US/kb/What-is-the-Rating-Average-and-how-is-it-calculated)

**Q 9 - 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? (RANKING A NUMBER OF OPTIONS).**

4.5.38 The results of question nine, which asked respondents their preference for the way any lorry area would be operated, are shown below in Figure 4.11. This figure shows the preferences in graphical format<sup>8</sup>.

4.5.39 Alternative 3: GENERAL DISRUPTION AND OVERNIGHT PARKING which includes an emergency lorry holding, with free provision for Operation Stack and Dover TAP/ Eurotunnel excess but with additional chargeable basic overnight parking was the preferred choice.

**Figure 4.11 – 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? (RANKING A NUMBER OF OPTIONS).**



<sup>8</sup> [http://help.surveymonkey.com/articles/en\\_US/kb/What-is-the-Rating-Average-and-how-is-it-calculated](http://help.surveymonkey.com/articles/en_US/kb/What-is-the-Rating-Average-and-how-is-it-calculated)

## 4.5.40

Respondents were asked to explain their reasons for the above responses with a selection of responses provided below:

- *'It is very important that free parking and facilities are provided to prevent littering and fouling which occurs during stack and indeed at all other times on the M20, J111 and the A20 to and from the ferry'.*
- *'If you charge to use the facility drivers will not always use it. Not all foreigner firms provide expenses i.e. drivers, especially Eastern European ones'.*
- *'Neither Operation Stack nor the other uses suggested for the site (overnight parking, temporary relief of queuing before departure) justify taking a large swathe of countryside. Operation Stack has, apart from exceptionally in 2015, only been implemented for a few days or part days of the year, the lorry park would be empty most of the time. Kent has a disproportionate amount over overnight stopping partly because of the banning of HGV traffic in France and much of Europe from 10 pm on Saturday to 10 pm Sundays and the insecurity around Calais, this should be addressed in partnership with the French and EU authorities as a wider issue'.*
- *'Alternative 3 provides a solution to diminishing and incidence of operation stack and providing additional lorry parking to meet current and future requirements. Thereby reducing the impact of illegal and inappropriate lorry parking off road. Alternative 4 would provide for a truck stop that could not be justified given the existing resources at Stop 24 and would increase the detrimental impact on the environment'.*
- *'The top priorities of a new lorry park should be as per Alternative 3 but I can see that Alternative 4 might encourage lorries away from local roads & industrial estates'.*

**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.**

4.5.41

Varied responses were received to question 10, with examples set out below:

- *'The current lorry parking facilities established at Stop 24 services could be expanded with help from public funds to provide additional parking and a free holding area when operation stack is in place or operation TAP. This would negate the need for a new truck stop, as suggested in Alternative 4'.*
- *'A network of smaller lorry parks spread along the motorway network away from local communities- one huge holding area is a disaster waiting to happen'.*
- *'The existing commercial lorry parks will not be able to compete with this site at the scale of which it is being proposed. Highways England need to come up with a solution to manage multiple smaller sites. This would have the huge advantage of resilience, for example in the scenario of an accident blocking the M20'.*
- *'Provision of full facilities would assist in reducing the environmental impact of illegal parking; and provide proper rest facilities of users. However it must be coupled with enforcement to prevent illegal parking elsewhere within East Kent'.*
- *'The offer of a lorry park, with the charge paid for at point of purchase of a ferry crossing place rather than if a driver uses it, will free roads of the current blight'.*

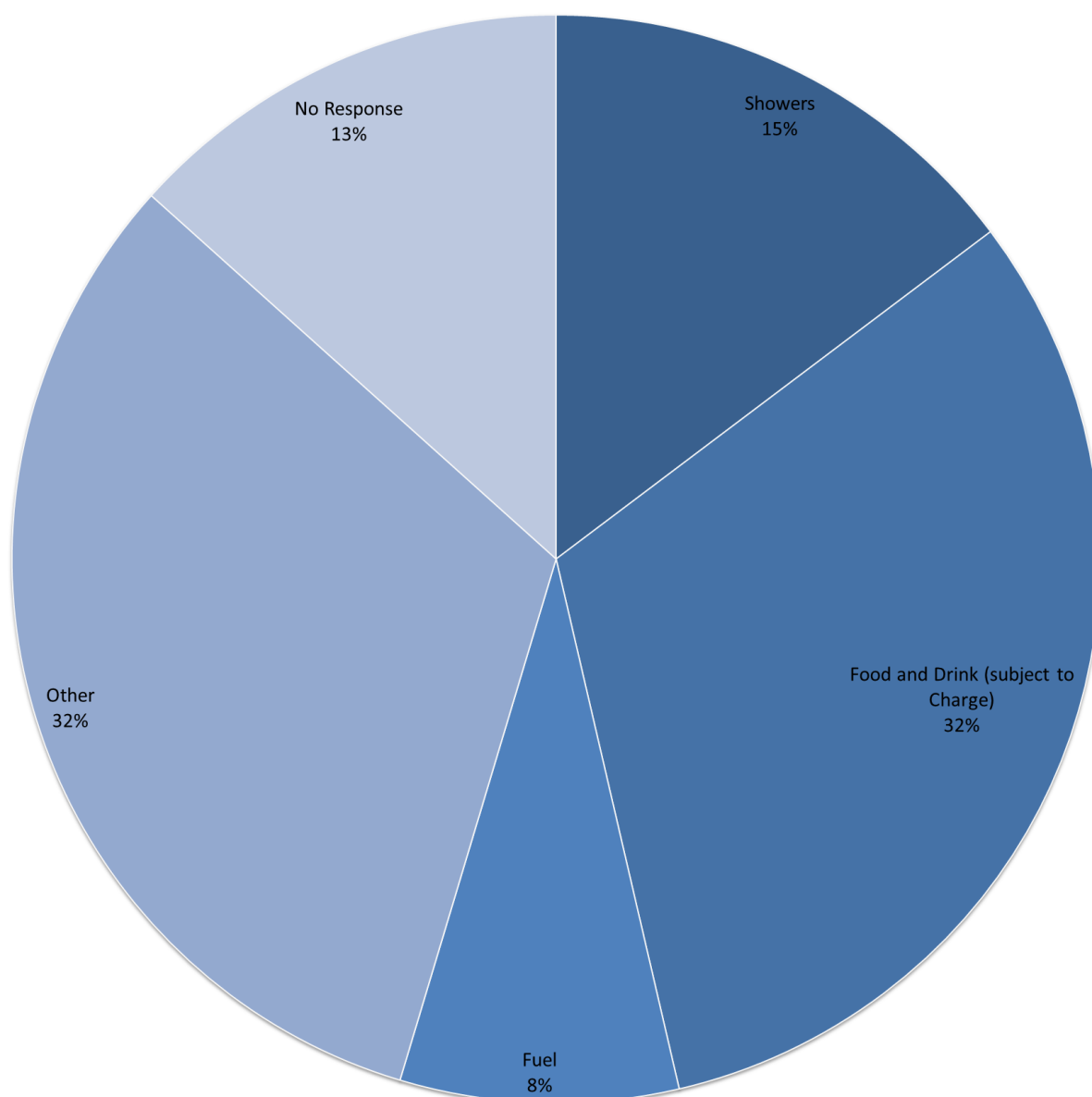


**Q 11 - IN ADDITION TO THE MINIMUM PROVISION OF TOILETS AND HAND WASHING, DRINKING WATER AND REFUSE DISPOSAL, WHAT FACILITIES SHOULD BE PROVIDED IN ANY SOLUTION? (MULTIPLE CHOICE)**

4.5.42 The results of question eleven, which asked respondents what additional facilities should be provided as a part of a permanent lorry park, are shown in Figure 4.12 below.

4.5.43 The results show that the large percentage of respondents (32%) consider that food and drink, (subject to a charge), should be provided in addition to the basic facilities noted above.

**Figure 4.12- Q 11 IN ADDITION TO THE MINIMUM PROVISION OF TOILETS AND HAND WASHING, DRINKING WATER AND REFUSE DISPOSAL, WHAT FACILITIES SHOULD BE PROVIDED IN ANY SOLUTION?**



## 4.5.44

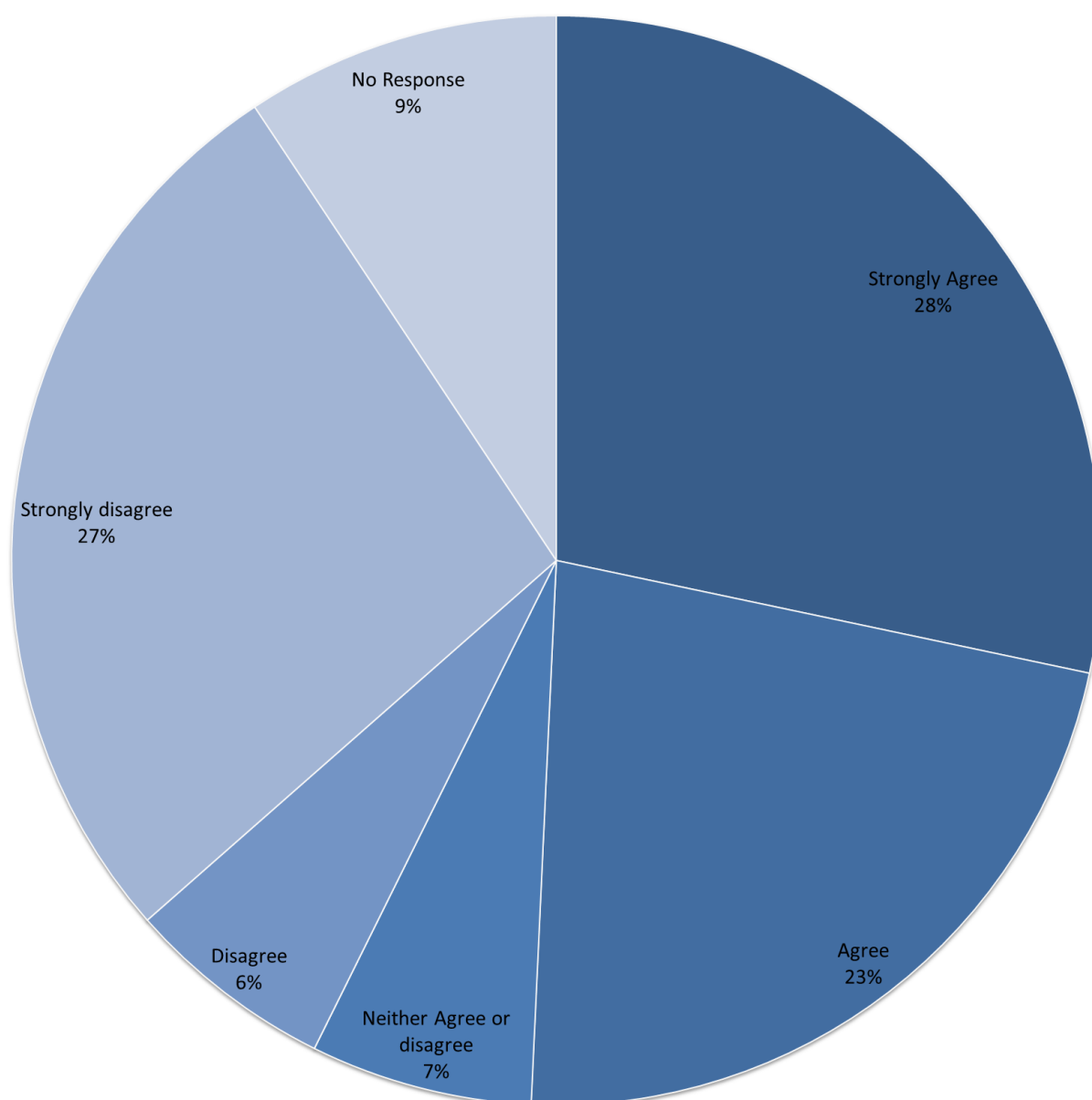
It is noted that a similar percentage of respondents (32%) provided additional information. Some examples of these are set out below:

- *'To our knowledge, biggest percentage of foreign lorry Drivers are self-sufficient, and do not want to pay for anything (i.e. parking). Why us the British tax payer subsidise any of these services'.*
- *'Providing as many facilities as possible will encourage and help drivers to keep their environment clean'.*
- *'A compulsory check point for all foreign trucks where they can be fined for any offences that they have committed whilst in the UK, including any tolls that they have not paid'.*

## Q12 - DO YOU AGREE THAT A LORRY AREA WOULD ADDRESS THE CURRENT TRAFFIC PROBLEMS ON THE M20?

- 4.5.45 The results of question twelve, which asked respondents if they agreed that a lorry area would address the current traffic problems on the M20, are depicted below in Figure 4.13.
- 4.5.46 The results show that just over half the respondents (51%) either strongly agreed or agreed with this statement.
- 4.5.47 A sizeable portion (33%) strongly disagreed or disagreed with 7% neither agreeing nor disagreeing.
- 4.5.48 9% of respondents chose not to answer this question.

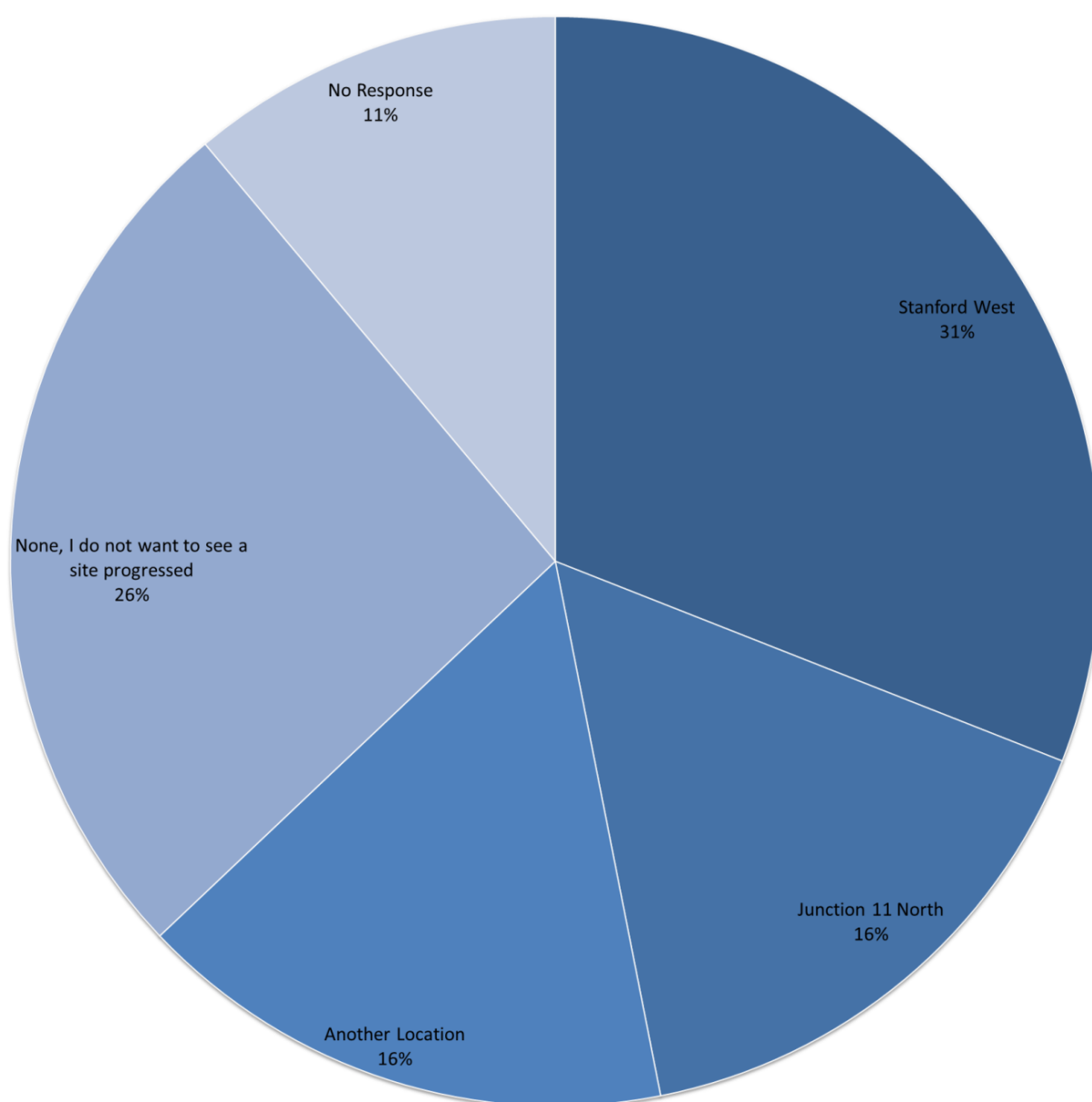
**Figure 4.13 - Q12 - DO YOU AGREE THAT A LORRY AREA WOULD ADDRESS THE CURRENT TRAFFIC PROBLEMS ON THE M20?**



### Q13 - WHICH SITE WOULD YOU LIKE TO SEE PROGRESSED?

- 4.5.49 The results of question thirteen, which asked respondents which site they would like to see progressed, are shown in Figure 4.14 below.
- 4.5.50 The results show the clear site preference for those that agreed that a lorry park should be progressed was for the Stanford West site with 31% of the responses.
- 4.5.51 However a sizeable percentage (26%) stated that they did not want to see any site progressed.
- 4.5.52 11% of respondents chose not to answer this question.

**Figure 4.14 - Q13 - WHICH SITE WOULD YOU LIKE TO SEE PROGRESSED?**



## Q14 - IF YOU HAVE ANY COMMENTS YOU WOULD LIKE US TO TAKE INTO ACCOUNT, PLEASE USE THE SPACE PROVIDED BELOW.

- 4.5.53 514 respondents provided additional comments in response to Question 14 of the questionnaire (written and online).
- 4.5.54 Varied responses were received to question 14, with a number of examples set out below:
- *'It appears from having inspected the information provided during the consultation that insufficient work has been carried out to analyse assess and evaluate the actual causes of the traffic chaos which occurs when operation stack is implemented. Since this is the justification for the expenditure of £250 million this is the very least a startling omission, and one which should be rectified. There is a significant difference between a project being in acted "at pace" and one being executed with wholly indecent haste. It has to be made clear that there is a strong resistance to the consultation proposals. The main justification for this resistance is an overwhelming certainty that as defined the proposals will not resolve as a solution for Operation Stack, and that the funding provided should be far more imaginatively and intelligently utilised, to the benefit of the population of Kent and not to its harm. Since this has finally become recognised as a 'Nationally Significant Problem' it requires a National Solution, a strategic solution: something more than just itself, something more than just a lump of concrete poured onto the earth: something worthwhile'.*
  - *'If the proposal is implemented then proper provision should be made to accommodate wildlife - wildlife routes would need to be created across this 'desert' and consideration should be given to the fact that wildlife moved by man have no comprehension and are likely to move back - especially birds! The effect of surfacing such a huge area should be carefully considered - breaking it up with wildlife routes and also using a porous surface or ideally rubber matting to minimise the visual damage to the environment would also reduce the risk of increasing flooding and creating run-off. If any provision is made then live transport should be properly accommodated'.*
  - *'There needs to be strong encouragement to haulage companies to ensure drivers use the area. Currently there is no monitoring or enforcement to move 'fly parked' lorries to more suitable area, despite 'no parking overnight' signs'.*
  - *'Speaking as a professional truck driver for 35years, and covering all the UK there is a lack of parking nationwide. I understand Ashford Borough Council has granted parking for development on the Ashford truck stop. So that is due to go. Trucks are here to stay so we all need them most things people buy are transported by road. If this truck stop so developed correctly Kent could lead the way and show how to treat truck drivers with the respect they deserve. And not treated like second class citizens'.*

## 4.6 CONCLUSIONS

- 4.6.1 In terms of information about the respondents the vast majority of respondents/attendees were from the Kent area (postcodes beginning in CT4, CT6, CT13 to CT21 and ME14 to ME20 were the most common – see Appendix 6) and were noted to be daily users of the M20 or A20 between Dover and Maidstone.
- 4.6.2 Overall the social, economic and environmental impact that Operation Stack personally had on respondents was noted as being considerably negative. A sizeable number of respondents (60%) would like to see an alternative to reduce or remove the need for freight traffic to park along the M20 and so reduce the noted social, economic and environmental impacts that Operation Stack currently has on the Kent area.
- 4.6.3 Following on from this over half the respondents strongly supported or supported the provision of a permanent lorry area as an alternative to reduce or remove the need for freight traffic to park along the M20. A notable percentage of the respondents (29%) did however strongly oppose this with a further 5% opposing it, so a strong degree of opposition is also evident.
- 4.6.4 In terms of the operation of the site the preferred choice amongst respondents was for an emergency lorry holding area, with free provision for Operation Stack and Dover TAP/Eurotunnel excess but with additional chargeable basic overnight parking was the preferred choice. This aligned with Alternative 3 as put forward in the consultation documentation.
- 4.6.5 Over half the respondents agreed that a lorry area would address the current traffic problems on the M20 with a preference for the Stanford West site amongst those that wished to see a permanent lorry park progressed.
- 4.6.6 The percentage of respondents who did not want to see a permanent lorry park area was, however, also notable.

# 5

## GENERAL RESPONSES

### 5.1 INTRODUCTION

5.1.1 In addition to the online and written questionnaire responses, 262 respondents provided additional comments via written letter or e-mail.

5.1.2 These were generally noted to be of a more detailed nature and included a number of responses from the statutory environmental bodies (the Environment Agency, Historic England, Natural England, Kent Downs AONB unit), formal bodies and business groups, as well as parish, district, borough and county councils.

### 5.2 DETAILED RESPONSES FROM STATUTORY ENVIRONMENTAL BODIES, DISTRICT/COUNTY COUNCILS AND FORMAL BODIES

5.2.1 A brief summary of the issues raised by the statutory environmental bodies and district/county councils are provided below:

#### THE ENVIRONMENT AGENCY

5.2.2 No preference on the site or alternative uses of same was provided by the EA.

5.2.3 The EA's response did highlight a number of environmental issues that would have to be addressed as part of the detailed design either of the proposed site options. This included the need for an adequate drainage system to protect surface and ground water quality, the use of Sustainable Urban Drainage Systems as part of the final design and the need for ecological surveys of watercourses.

5.2.4 The need to consider the Water Framework Directive as part of any EIA was also noted as well as the potential need for a Flood Risk Assessment and Flood Defence Consent.

#### HISTORIC ENGLAND

5.2.5 No preference on the site or alternative uses of same were provided by Historic England, although preliminary thoughts on both site's impacts on the historic environment were provided.

5.2.6 Historic England stated that there were no designated heritage assets within either site option and historic environment issues are therefore likely to focus on the setting of nearby designated assets, non-designated assets (archaeology) and the AONB.

5.2.7 It was stated that adoption of the Stanford West option has potential to cause what is likely to be significant harm to designated heritage assets (chiefly Westenhanger Castle) both in terms of their setting and future economic viability, particularly should land between the M20 and the railway be used for a 365 days a year overnight lorry park and truckstop.

5.2.8 The likely level of harm to the historic environment based on their current understanding appeared to be lower for the Junction North 11 but it was noted that this was located close to the AONB.

## NATURAL ENGLAND

- 5.2.9 No preference on the site or alternative uses of same were provided by Natural England.
- 5.2.10 Natural England stated that the location and design of the scheme should be guided by the landscape and ecological matters in addition to the operational requirements.
- 5.2.11 It was stated that both the Stanford West and Junction 11 North options are likely to have implications for the Kent Downs AONB with these likely to be greatest for the Junction 11 North option.
- 5.2.12 It was advised that, irrespective of which scheme/combination of schemes progresses the following measures should be fully explored:
- Softer engineering options such as reinforced grass surfaces;
  - Breaking up the areas of the site which will not be used as the permanent lorry park with significant blocks of planting within the site itself;
  - Creation of a woodland shaw(s)<sup>9</sup> in keeping with the locality to help soften the boundary of the site rather than creating linear boundary edges;
  - Undertaking landscape mitigation in the wider area, outside the confines of the scheme boundary;
  - Ensuring that any landscape planting/mitigation measures link into the wider habitat network; and
  - Use of innovative technology such as mobile infrastructure (lighting columns, facilities etc.) which will only be present on the site when it is operational.
- 5.2.13 Natural England also noted the proximity of the Stanford West option to the Gibbin's Brook Site of Special Scientific Interest (SSSI) which is of importance for its fen, acid grassland and alder carr habitats. The proposal has the potential to indirectly impact the SSSI. Measures should therefore be incorporated to avoid impacts to the SSSI wherever possible along with mitigation for any impacts that cannot be avoided.
- 5.2.14 It was also stated that there are habitats present which may support protected species and these will need to be fully considered as part of the scheme.

## KENT DOWNS AREA OF OUTSTANDING NATURAL BEAUTY (AONB) UNIT

- 5.2.15 Kent Downs AONB Unit response stated that the Government's recognition of the problems caused by Operation Stack as well as fly parking and other freight management issues was welcomed, along with its commitment to fund a solution.
- 5.2.16 However, they went on to state the proposed lorry park solution would have a major damaging effect on landscape, create a significant visual impact as well as affecting tranquillity. This would result in significant harm to the setting of the Kent Downs AONB and as such is not felt to be an appropriate solution to the problem. Accordingly, the Kent Downs AONB Executive strongly objected to the proposal to construct a lorry park in the Stanford area.

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<sup>9</sup> A shaw is a strip of woodland usually between 5 and 15 metres (15 and 50 feet) wide.



- 5.2.17 Kent AONB Unit went on to suggest a number of ‘alternative solutions’ to the problem, including:
- Further investigations/works to the M20 that would allow for continued two way traffic flow while implementation of operation stack is in place;
  - Tackling the issue of growth in road freight volumes through Dover/Folkestone by promoting increased use of rail freight and use of other sea ports;
  - Greater use of technology based traffic management – most HGVs are managed by GPS and if there are problems developing in Dover Docks or the Channel Tunnel, it should be possible to delay arrival of some lorries. This could disperse them to a series of motorway service areas across the country or slow their speed so they arrive in Dover later; and
  - Lorry holding facilities elsewhere, further away from the AONB where there would be less harm and consideration of a multiple location solution.

- 5.2.18 The response requested that if a lorry park is progressed that a number of mitigation measures be included as part of the final design.

## SHEPWAY DISTRICT COUNCIL

- 5.2.19 Shepway District Council’s response strongly supported the Stanford West option and objects ‘in the strongest possible terms’ to the Junction 11 North option.

- 5.2.20 In terms of the alternative uses of the site, the council favoured Alternative 3 subject to further details. The council stated that there is no justification for Alternative 4.

- 5.2.21 The council concluded their response by asking for the following outcomes:

- The investment in a lorry holding area that allows the M20 to remain open at all times;
- A new lorry holding area is constructed at pace;
- The lorry holding area is accessed directly from the M20 at Stanford;
- The solution includes provision to the west of the existing Stop 24 facility for all year round overnight lorry parking and for use as a replacement for Dover TAP; and
- Government actively supports the development of a balanced economy by recognising our ambitions and assisting in the development of land to the south west of J11 to deliver economic growth and a sustainable community.

## KENT COUNTY COUNCIL

- 5.2.22 It was noted from their response that Kent County Council (KCC) had investigated many potential sites for lorry parks as an alternative to Operation Stack and has supplied all available information to Highways England as part preliminary discussions on the consultation process.

- 5.2.23 KCC considers that two site options put forward as part of the consultation are the most advantageous.

- 5.2.24 KCC’s response supported the Stanford West option over the Junction 11 North option. ‘Alternative 3: General Disruption and Overnight Parking’ is also supported.

- 5.2.25 KCC’s response went on to state that 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.

- 5.2.26 The response also set 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 as a caveat to the provisional support given by KCC for a Permanent Lorry Area at 'Stanford West'.
- 5.2.27 KCC's response also noted that they supported 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.

## RESPONSES FROM FORMAL BODIES

- 5.2.28 The below formal bodies also provided comments on the consultation, which are considered as part of the wider responses:

- Channel Ports Ltd.
- Channel Ports Ltd.
- Dover Harbour Board
- Eurotunnel
- Go Folkestone Action Group
- HS1 Ltd
- Kent Business Advisory Board
- Kent Invicta Chamber of Commerce
- London Freight Transport Association
- Port of Dover
- RAC Foundation
- Stop 24 services
- Transport Focus

## 5.3 GENERAL RESPONSES FROM WIDER STAKEHOLDERS

- 5.3.1 The comments summarised in Section 4 above were largely reflected in a number of more detailed general responses from the public. This included responses from both private individuals as well as formal bodies from a number of locations, although generally in the Kent area.
- 5.3.2 Table 5.1 contains some selected extracts from letters and e-mails received to give an indication of the responses received.

**Table 5.1 – Extracts from General Responses**

### **Extract 1**

*Dear HE,*

*Given the scale of the proposed lorry park and the funding secured from government it is disappointing that only two options are now being considered.*

*The consultation document is very helpful however and, in my view, clearly establishes the*

*site west of Stanford as the more favourable site from an operational, environmental and amenity perspective.*

*The new lorry park should minimise the impact on local roads, however the north of j11 site would lead to significant issues at J11 with local traffic accessing and egressing the a20 and stone street. Direct access from the m20 to the Stanford site is therefore clearly preferable. The north of j11 site is also at the foot of the Downs and would have a significant adverse impact on the AONB. Para 116 of the NPPF requires that major developments should consider alternative locations in such cases and clearly the site at Stanford is a preferable location in landscape terms.*

*Both sites are located in open countryside in the setting of the AONB and close to residential properties. The landscape and amenity impact should therefore be severely restricted through occasional use and through high quality, sensitive design.*

*There is no case for a new lorry service station - an underused facility sits directly opposite the site, and has space to extend. This option should be discounted.*

*The funding from government is to resolve operation stack - not to improve other road infrastructure or to resolve local issues.*

*The use of the site should therefore be occasional only to allow for minimal on site infrastructure in order to minimise the landscape and amenity impacts of this development.*

*Serious consideration should be given to the use of a rubberised green web surface or similar to avoid the use of Tarmac surfacing in this otherwise rural area. If the lorry park were to be used occasionally this should be both functional and proportionate and could take proper account of the sensitive location if designed correctly.*

*The concreting over of this vast area of countryside must be avoided if there are viable alternatives.*

*Although the need for the lorry park is clear, the decision has significant long term implications and the fact that the site west of Stanford may take slightly longer to deliver should not be a material consideration in the decision making process.*

*If there proves to be a case for more frequent or intensive use of the site in the longer term, that should be considered separately and later, once the real operational and amenity impacts are established through occasional use of the site*

## **Extract 2**

*The proposed parks are insufficient for the number of lorries parked on the M20 during Operation Stack. Operation Stack would therefore continue to create problems for Kent residents.*

*The proposed parks would blight the area in which they are constructed.*

*The proposed expenditure of 250 Million Pounds is public money wasted. For a fraction of this cost, the police service should be used to turn back traffic on the M20 (and other roads if necessary) and direct the vehicles to return to their departure point. The haulage industry will adjust to this procedure and cease their habit of parking anywhere with consequential inconvenience to, blighting and frequent fouling of areas of Kent.*

*Turning back the traffic can be implemented immediately. Building lorry parks takes time. Building lorry parks which cannot cope with the number of lorries involved is a waste of time and money.*

**Extract 3**

*Thank you for inviting a response to this proposal and providing on-line documentation and local consultation events.*

*I note your four main alternatives but I would like to strongly encourage option 3. General Disruption and Overnight Parking.*

*As a local resident who travels frequently from my home ..... to visit my daughter and family ..... and to shop in Hythe, etc., I encounter mostly the daily problem of 'overnight' parking of large lorries in lay-bys both official and unofficial and not only at night. There is much destruction of verges, kerbs, general rutting of roadsides, with disgusting littering including human waste. Our whole area is spoilt by litter and general mess. Lorries may park in the wrong direction causing confusion and hazard at night. Lorries even park on the motorway slip-roads which must be illegal and dangerous. When I have raised this with my local MP, Damian Collins, he says police do not move them on because there is nowhere for them to go. When I worked in Ashford, where a lorry park was provided at Sevington, when lorries parked overnight in other parts of the town....., we were told it was because the lorry drivers did not want to pay for the parking.*

*I believe it is essential that there is provision of adequate parking for lorries overnight on a daily basis.*

*I think this should be FREE OF CHARGE so that there is no excuse for the lorry drivers to go elsewhere. I really would ask that due consideration be given to not charging for this facility. Money can be taken from the sale of food and drink and fuel on the site. To charge could be counterproductive if more money has to be spent on policing, road maintenance and litter picking.*

*I think the people of South East Kent deserve respite from this longstanding blight. The police must be empowered and adequately funded to ensure that use of the lorry park is enforced.*

*Provision to reduce the need for and the disruption caused by Operation Stack is clearly ideal. However it seems to me that the last year was exceptionally bad because of some potentially avoidable issues.*

*Cross channel capacity clearly is an issue and the volume of traffic has increased as has been stated. It seemed an unwise decision to reduce capacity, when at peak times it is clearly needed, by insisting on the closure of MyFerryLink.*

*However much of the disruption caused by that closure and the resulting strike action could have been prevented if the French police had intervened to stop the highly illegal acts of burning of tyres in the Channel Tunnel entrance and the sabotage of ships in berths in the Port of Calais.*

*Capacity is surely the key to the inevitable weather problems in the channel or technical issues in the tunnel. It is very rare that traffic movement is completely stopped but capacity may be reduced by these issues.*

*It also seems to me that it might be possible to use a modern communication solution, when there is an issue that would lead to Operation Stack coming into force, to prevent lorries continuing their journey from other parts of the country and descending onto Kent's motorways. We have some lorry parking facilities in motorway service areas throughout the country and perhaps more, smaller facilities could be provided where land is more available than around here, rather like the provision that is made on French motorways where there is a lorry park every 15 to 20 miles. Lorries could be made to wait until the problem causing the hold-up had been resolved.*

*I do not have a strong view on which site near Stanford would be better. Straddling the motorway as with the Stanford West proposal appears to have logistical advantages.*

*I do feel when the lorry park is built and in use and 'fly-parking' is a thing of the past, South East Kent deserves a major clean-up with investment in the repair and improvement of our dreadfully maintained roads and verges and a serious litter picking exercise.*

*We have suffered too long for needs of people passing through. Garden of England?*

**Extract 4**

*I have no preference for where the lorry park is sited but the problem needs to get sorted. I thought that there is already a lorry park at Sevington which is underused.*

*Lorries park indiscriminately where ever they feel like it. this has to stop as it is illegal; the police are not worried as they take the easy way out.*

*You don't mention the fact that operation stack is caused by French strikes; presumably the French government will be putting money in the pot as we did in Calais for the barrier system.*

*I hope the Kent people will not be paying anything towards this project it is a government issue not just Kent.*

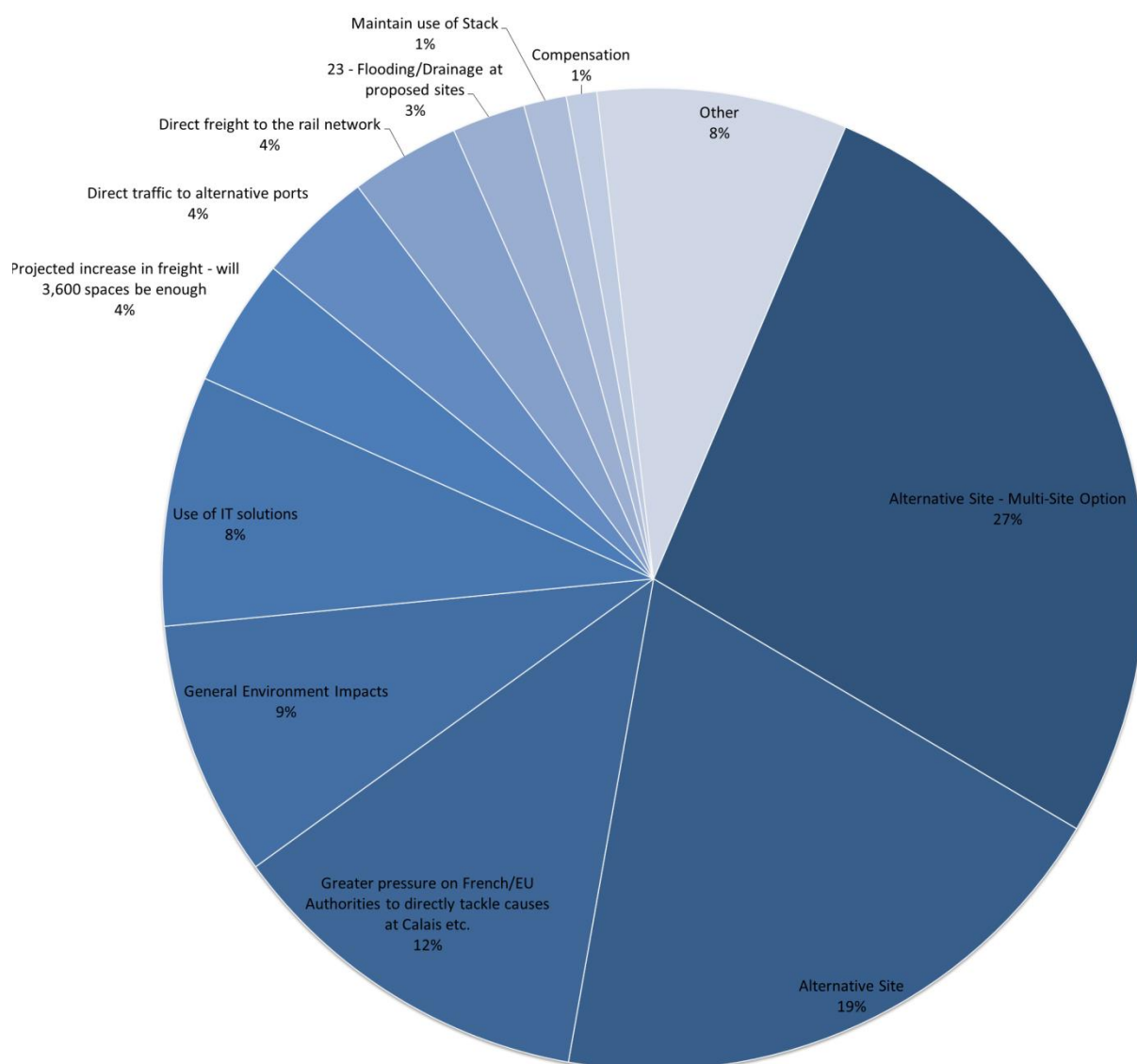
*All you need to do to stop lorries parking illegally is to get the police to do their job. slap a fine on the windscreen. The news soon gets around. but no we will spend thousands of pounds to solve the problem.*

*Let's start being forceful with our actions instead of pussy footing about hoping the problem will go away.*

## 6 GENERAL ISSUES RAISED

- 6.1.1 For ease of analysis a number of common themes were identified from a review of the 514 respondents that provided additional comments in response to Question 14 of the Highways England questionnaire (written and online) as well as elsewhere in their responses (Section 4 above).
- 6.1.2 The further 262 respondents who also provided general responses via written letter or e-mail (discussed in Section 5 above) were also analysed to identify general issues.
- 6.1.3 Common issues were identified from both the questionnaires and general comments with a summary of these shown in Figure 6.1 below.

**Figure 6.1 – General Issues Raised**



- 6.1.4 From a preliminary analysis of all these responses (776 in total) the most common general issues are discussed below under the following headings.

## 1 - TACKLING THE CAUSES OF OPERATION STACK AT SOURCE

- 6.1.5 A significant theme noted in the responses (61 respondents) was for the UK Government to make greater efforts to tackle the causes of disruption at the Port of Dover and Eurotunnel 'at source' i.e. work with the French authorities and those at Calais directly to address issues of striking workers and immigration issues.

## 2 - ALTERNATIVE OPTIONS

- 6.1.6 As part of the public consultation process 33 'alternative options' were put forward by members of the public and other formal bodies that responded. This included 'the use of IT solutions' as a solution to Operation Stack, a response noted by 41 respondents.
- 6.1.7 Some of these 'alternative options' were put forward as standalone solutions to Operation Stack.
- 6.1.8 A number of them were also put forward as a part of suite of measures to either complement Operation Stack, or other options such as the development of a lorry park solution (single or multi-site option).

## 3 - ALTERNATIVE SITES

- 6.1.9 96 of the respondents stated their preference for a number of specific alternative site locations. Some respondents suggested specific sites and provided identifiable boundaries. Others provided more general alternative locations where a lorry park could be developed.
- 6.1.10 Additionally 135 respondents stated their preference for the provision of a number of smaller sites throughout the UK and particularly along the M20 (with a smaller number also referring to the A20), as an alternative to the two proposed sites.

## 4- GENERAL ENVIRONMENTAL ISSUES IN RELATION TO THE PROPOSED SITE OPTIONS

- 6.1.11 The environmental impact of the two proposed site options was raised throughout the responses (42 respondents), with concerns regarding flooding and drainage on the proposed sites being specifically noted in a number of responses (12 respondents) as well as through the public information exhibitions. Environmental issues raised are listed below:
- The potential for the proposed sites to increase noise, light and air pollution in the area;
  - Impact on local traffic movements;
  - The visual impact, especially in relation to the Kent Downs AONB; and
  - The need for waste and recycling to accompany any permanent lorry park.



## 5 - ABILITY OF PROPOSED SITES TO DEAL WITH PROJECTED INCREASE IN FREIGHT TRAFFIC

- 6.1.12 21 of the respondents raised concerns with the ability of the proposed sites 3,600 parking spaces, to provide adequate capacity to deal with Operation Stack in the future noting the 6% increase in freight traffic between the third quarters of 2014 and 2015 and, as stated a potential doubling over the next decade<sup>10</sup>.

## 6 - OTHER

- 6.1.13 A number of other themes arose through the public information exhibitions and the written responses, a summary of which is set out below.
- The proposals were seen as a 'knee jerk reaction' to the 2015 scenario, which it was stated was an exceptional year in terms of the 'perfect storm' of issues seen during the summer. The majority of these responses stated their preference for Operation Stack to be maintained as a solution to disruption at the Port of Dover and the Eurotunnel;
  - A number of respondents were concerned with the future on-site security of any potential permanent lorry park site. This extended to issues of fire risk, emergency access and terrorist attack;
  - Concern regarding property blight due to the proposed permanent lorry area locations was expressed by a number of respondents in the localities of the two proposed sites. Further details on compensation were requested and will be considered by Highways England at the appropriate time. Highways England will be able to consider any claims in due course under the Compensation Code; and
  - A number of respondents who supported the development of a permanent lorry holding area encouraged Highways England to progress the scheme as soon as possible.

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<sup>10</sup> 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 – Highways England – Page 9



# 7 CONCLUSIONS

## 7.1 SUMMARY OF RESPONSE ANALYSIS

- 7.1.1** The non-statutory consultation process undertaken by Highways England sought to engage local communities and other stakeholders to test the case for a permanent lorry holding area, so that the subsequent decision-making process takes into account, as far as is appropriate and possible, the public's views and opinions. It received a very large response from the public with a total of over 1279 written or online responses received and over 1000 people attending the public information exhibitions. Most responses were in the form of written responses (online/written questionnaires, written correspondence and e-mails).
- 7.1.2** Overall, the responses received covered a wide variety of stakeholders including the general public, especially from areas close of the 2 proposed sites for the permanent lorry area (Stanford West and Junction 11 North), local businesses, formal bodies and local government. With a view to a future EIA process the statutory environmental bodies were also consulted.
- 7.1.3** In terms of information about the respondents and the attendees at the public information exhibitions, the majority were informed about the consultation through the local and national media reflecting a successful media campaign for the process. The vast majority of respondents/attendees were noted to be from the Kent area (postcodes beginning in CT4, CT6, CT13 to CT21 and ME14 to ME20 were the most common). A geographic spread of the respondents is provided in Appendix 6. The vast majority of respondents were noted to be daily users of the M20 or A20 between Dover and Maidstone.
- 7.1.4** The social, economic and environmental impact that Operation Stack personally had on respondents was noted as being considerably negative. The impacts included major disruption to people's daily lives including being late for appointments, work and social events.
- 7.1.5** The wider economic and social impacts on the Kent area were well documented in the responses from local businesses, formal bodies and local government.
- 7.1.6** In terms of the options put forward as part of the public consultation, 60% of the respondents either disagreed strongly or disagreed that Operation Stack should remain as the main response to cross-channel disruption. From this it is clear that the majority of respondents would like to see an alternative to reduce or remove the need for freight traffic to park along the M20 and so reduce the perceived social, economic and environmental impacts that Operation Stack currently has on the Kent area.
- 7.1.7** Following on from this 55% of the respondents strongly supported or supported the provision of a permanent lorry area as an alternative to reduce or remove the need for freight traffic to park along the M20. A notable percentage of the respondents (29%) did, however, strongly oppose this with a further 5% opposing it, so a strong degree of opposition is also evident. Further analysis of these responses showed a generally equal geographic spread of those who support and oppose the provision of a permanent lorry area close to the proposed sites options put forward as part of the consultation. The postcodes CT18 (Lyminge), CT21 4 (Postling), CT21 5 (Hythe) and TN25 6 (Stanford) are noted as the most common areas for respondents to this question to reside with a relatively even spread between those that oppose and support the options.
- 7.1.8** Opinion on the numbers of lorries that any site should be able to accommodate at any given time was generally evenly split amongst the respondents.

- 7.1.9 In terms of priorities for the location of any proposed site the responses were generally evenly spread across the suggested options with most effective in keeping the M20 open being the highest ranked priority and having the least impact on residential amenity also ranking high. Development and operational costs as well as an income for the taxpayer were the least important to respondents.
- 7.1.10 In terms of the operation of the site the preferred choice amongst respondents was for an emergency lorry holding area, with free provision for Operation Stack and Dover TAP/Eurotunnel excess but with additional chargeable basic overnight parking was the preferred choice. This aligned with Alternative 3 as put forward in the consultation documentation.
- 7.1.11 Over half the respondents agreed that a lorry area would address the current traffic problems on the M20 with the highest preference (31%) for the Stanford West site amongst those that wished to see a permanent lorry park progressed. The percentage of respondents who did not want to see a permanent lorry park area was, however, also notable (26%).
- 7.2 NEXT STEPS**
- 7.2.1 Highways England will provide a report on the consultation the Department for Transport. It is anticipated that the Secretary of State will make an announcement on the way forward in the summer of 2016.
- 7.2.2 It is expected that an environmental assessment will be carried out for any proposed lorry area. As part of that process, a non-statutory consultation will be undertaken. This will also take place in the summer of 2016.

