

From: Matthew Balfour, Cabinet Member for Environment and Transport  
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To: Environment and Transport Cabinet Committee – 13 January 2016

Subject: **Proposed Response to the Highways England Consultation on a proposal to create a Permanent Lorry Area adjacent to the M20 at Stanford**

Non-Key decision

Classification: **Unrestricted**

**Past Pathway of Paper:** N/A

**Future Pathway of Paper:** Cabinet Member Decision

Electoral Division: Elham Valley, Susan Carey

**Summary:** This report outlines a proposed response to the consultation by Highways England on a proposal to create a Permanent Lorry Area adjacent to the M20 at Stanford.

It is proposed that Kent County Council (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 Section 2.6 of this report.

It is proposed that this site operates as 'alternative 3: General Disruption and Overnight Parking' for the reasons described in Section 2.4 of this report. In addition to emergency use in place of Operation Stack on the M20 this proposal will alleviate 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. 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 proposed response in Section 2 of this reports 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'.

**Recommendation:** The Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Environment and Transport on the proposed response to the Highways England Consultation on a proposal to create a Permanent Lorry Area adjacent to the M20 at Stanford.

## 1. Background

- 1.1 Highways England is consulting on a proposal to create a Permanent Lorry Area adjacent to the M20 at Stanford. This is the first of a two stage consultative process to develop a scheme that was provisionally allocated funding by Government in the Autumn Statement to;

*“Relieve the pressure on roads in Kent from Operation Stack with a new quarter of a billion pound investment in facilities there”.*

- 1.2 Highways England is using Permitted Development rights as the Highway Authority under Section 115 of the Highways Act 1980 taking account of Section 105A of the Act regarding Environmental Impact Assessments. This report summarises the current non-statutory consultation and outlines a proposed response from Kent County Council (KCC) with a preferred site option. A further public consultation is expected by Highways England later in the year on detailed design of a preferred site with a draft Environmental Statement.
- 1.3 Operation Stack has been implemented 48 times between 1997 and January 2015 with an average duration of 5-6 days a year. However in 2015, Operation Stack was implemented for 32 days, 5 days in January and then almost continuously in late June and throughout July. Reasons for its implementation in the summer were initially industrial action by ferry workers at the Port of Calais which was then exacerbated by migrants trespassing in the Channel Tunnel. At its peak there were an estimated 7,000 Heavy Goods Vehicles (HGVs) taking 36 hours to work through the queue.
- 1.4 The usual 2 phases of Operation Stack (Phase 1 Junction 11 to 12 coast bound and Phase 2 Junction 8 to 9 coast-bound) did not provide enough capacity and Phase 3 (Junction 9 to 8 London-bound) was implemented for the first time along with new phases involving closure of both carriageways between Junctions 9 and 11. Phases were renamed as ‘Stages’ and were re-designed to cope with the unprecedented numbers of HGVs.
- 1.5 Stage 1 is Junction (J) 8 to J9 coast-bound (capacity 2,100 HGVs); Stage 2 is J9 to J11 coast-bound (capacity 1,500 HGVs); Stage 3 is J9 to J8 London-bound (capacity 2,100 HGVs); and Stage 4 is J11 to J9 London-bound (capacity 1,500 HGVs).
- 1.6 In terms of economic impacts, figures produced by KCC, the Kent Invicta Chamber of Commerce and ‘Visit Kent’ demonstrate:
- An estimated cost to the Kent and Medway economy of around £1.45 million per day. Scaling the Kent figure up to the 32 days’ disruption caused by Operation Stack gives an approximate cost of £46 million. However, it is likely that this figure is a substantial under estimate.
  - 45% of tourism businesses reported cancellations; with 59% considered that they had lost up to 20% of business as a result of Operation Stack.
- 1.7 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.

- 1.8 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.
- 1.9 During the height of the crisis in July, the Transport Minister Andrew Jones MP visited Kent and the work of the European Gateway Strategic Delivery Group was presented. This group was set up after the January Operation Stack event and consisted of KCC, Kent Police, Highways England, Eurotunnel, Port of Dover, ferry companies, Road Haulage Association (RHA), FTA, logistics operators, lorry park operators and the district/borough councils of Ashford, Dover and Shepway.
- 1.10 Following the meeting with the Transport Minister, all organisations, including KCC, co-operated with the Department for Transport (DfT) instruction to prepare the former Manston Airport site for use so that the London-bound carriageway (Stages 3 and 4) would no longer be needed to queue HGVs. To date, the use of Manston has not been required.
- 1.11 Under instruction from Government to deliver a solution “at pace”, a subsequent report to the Cabinet Office Briefing Room (COBR) in August outlined a package of on and off-highway measures to hold approximately 5,500-6,500 HGVs at a preliminary cost of £468m. This was reported to this Cabinet Committee on 16 September 2015.
- 1.12 Subsequently, the DfT instructed Highways England to lead on the land acquisition, planning and delivery of a Permanent Lorry Area. A Planning Sub-Group consisting of Highways England, KCC, Shepway District Council and Statutory Environmental Bodies meet fortnightly to oversee the project. This sub-group reports bi-monthly to a multi-agency steering group consisting of the organisations in former European Gateway Strategic Delivery Group and local MPs.
- 1.13 Highways England has assessed a number of potential sites for a Permanent Lorry Area and narrowed the shortlist to two possible sites near Junction 11 of the M20 named ‘Stanford West’ and ‘Junction 11 North’. The consultation seeks the public’s views on how the current Operation Stack arrangements affect them; whether there is support for a Permanent Lorry Area, and if so, which is the preferred site; and the size, function and facilities that should be provided.
- 1.14 The ‘Stanford West’ site is to the north and south just west of Junction 11. The main entry and exit to the site would be direct from the M20 but with a secondary access through the Stop24 services. When being used for Operation Stack, the secondary access would enable lorries to approach from the east without having to travel to and turn around at the already congested Junction 10. Similarly, the secondary access would enable the site to be used for any overnight parking or truckstop purposes, while minimising the impact on the M20.

1.15 The 'Junction 11 North' site is just north of Junction 11. The site would be accessed from the B2068 which would be dualled between the site entrance and M20 Junction 11. There would be improvements to the roundabout and possibly the coast-bound on slip at Junction 11. There would be a secondary access from the A20 at the east end of the site for emergency use only.

1.16 Highways England also seeks views on how either site should be operated, for which there are four alternatives:

- 1) **Emergency Use:** Emergency lorry holding area which reduces or removes the need for Operation Stack only.
- 2) **General Disruption:** Emergency lorry holding area which reduces or removes the need for Operation Stack and/or Dover Traffic Assessment Project (TAP) and/or any M20 based Eurotunnel queue management.
- 3) **General Disruption and Overnight Parking:** Emergency lorry holding area as above, (with free provision for Operation Stack and Dover TAP/ Eurotunnel excess) but with additional chargeable basic overnight parking.
- 4) **General Disruption and Truckstop:** Emergency lorry holding area as above, 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.

1.17 It is proposed that the Permanent Lorry Area would accommodate at least 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.

1.18 Highways England is providing a number of consultation events in the local area including a Member briefing at County Hall on 11 January at 12noon.

## 2 Proposed KCC Response to the Highways England Consultation

2.1 It is proposed that KCC responds to the consultation with 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.

2.2 In response to the consultation on the impacts of Operation Stack, it is proposed that KCC submits detailed information that forms the basis for the summary of the economic impacts in Sections 1.6 to 1.8 of this report. This will help to strengthen the economic case for the public investment in an alternative solution to Operation Stack, which although pledged by Government, will still be subject to approval of a Business Case.

- 2.3 It is proposed that 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 as described in Section 1.17 of this report. 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 it is proposed that KCC includes in its response that 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.
- 2.4 It is proposed that KCC 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 the Port of Dover queue on the A20 with the Dover TAP which causes traffic problems on the local road network. 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. It is not proposed to support the provision of a truckstop as with 'alternative 4' as full service facilities for short term parking (less than 2 hours) is already available at Stop24 services. Non-provision of 24 hour services at the proposed sites will minimise additional disturbance to local residents.
- 2.5 The DfT is leading on a work stream to consider options and issues regarding future commercial operation the proposed Permanent Lorry Area for overnight parking and/or a truck stop. It is proposed that KCC in its response to the consultation urges DfT to complete this work quickly so that there is clarity around the commercial overnight parking element of the 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 should 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 to create a new strategic route from Dover to the Midlands and the North.

2.6 It is proposed that KCC 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. At this stage it is proposed to support 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) 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 in a replacement of the Dover TAP and Eurotunnel excess with dedicated access from the M20. The entire site would then be made available for use as an emergency lorry holding 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 (see Section 1.2 of this report) 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.

2.7 The 'Stanford West' site does have some disadvantages, including being close to the villages -of Sellindge and Stanford and some individual residential

properties. This consultation has caused considerable distress in the local community, especially with the lack of detail around the 'footprints' of the proposed sites. It is proposed that KCC will stress its disappointment in this aspect of the consultation to Highways England and emphasise that 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 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.

2.8 It is proposed that KCC's response outlines further issues that Highways England should consider, which include:

- 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 hydrocarbons, 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.
- 2.9 It is also proposed that KCC requests that the DfT consider 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 should also make 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.
- 2.10 It is proposed that 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 and therefore will be part of KCC's response to this consultation are described below for specific areas.
- 2.11 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](#).
- 2.12 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. 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.
- 2.13 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.

- 2.14 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.
- 2.15 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.
- 2.16 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.
- 2.17 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.
- 2.18 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.
- 2.19 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).

- 2.20 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.

### **3 Financial Implications**

- 3.1 There are no financial implications to KCC of providing a Permanent Lorry Area as £250 million was pledged by Government in the Autumn Statement 2015 and the scheme will be delivered by Highways England.

### **4 Legal implications**

- 4.1 There are no legal implications arising from the recommendations in this report.

### **5 Equalities implications**

- 5.1 There are no equalities implications arising from the recommendations in this report.

### **6 Other corporate implications**

- 6.1 There are no other corporate implications arising from the recommendations in this report.

### **7 Governance**

- 7.1 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. A Stakeholder Steering Group meets bi-monthly to oversee the overall progress of work to deliver solutions to Operation Stack and freight management issues in Kent. This consists of representatives of KCC, Highways England, Shepway District Council, Dover District Council, Ashford Borough Council, Eurotunnel, Port of Dover, ferry companies, Kent Police, Environment Agency, Department of Transport and local MPs.

### **8 Conclusions**

- 8.1 It is proposed that 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 Section 2.6 of this report.

- 8.2 It is proposed that this site operates as 'alternative 3: General Disruption and Overnight Parking' for the reasons described in Section 2.4 of this report. In addition to emergency use in place of Operation Stack on the M20 this proposal will alleviate the Dover TAP, queues at Eurotunnel and address inappropriate overnight lorry parking. Truck stop 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. 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.
- 8.3 The proposed response in Section 2 of this reports 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'.

## 9. Recommendation:

9.1 The Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Environment and Transport on the proposed response to the Highways England Consultation on a proposal to create a Permanent Lorry Area adjacent to the M20 at Stanford.

## 10. Background Documents

Highways England (December 2015) Management of Freight Vehicles through Kent: A Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/484139/S150599\\_Managing\\_Freight\\_Through\\_Kent\\_Consultation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484139/S150599_Managing_Freight_Through_Kent_Consultation.pdf)

Highways England (December 2015) Management of Freight Vehicles through Kent: Response Questionnaire.

[https://www.gov.uk/government/uploads/system/uploads/consultation\\_response\\_for\\_m\\_data/file/465/S150599\\_Managing\\_Freight\\_Through\\_Kent\\_Consultation\\_questionnaire.pdf](https://www.gov.uk/government/uploads/system/uploads/consultation_response_for_m_data/file/465/S150599_Managing_Freight_Through_Kent_Consultation_questionnaire.pdf)

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