

From: Mike Austerberry, Corporate Director for Growth, Environment and Transport

To: David Brazier, Cabinet Member for Environment & Transport

Subject: 14/00055 Lorry Park Network (Phase 1)

Key decision Expenditure of greater than £1 million

Classification: Unrestricted

Past Pathway of Paper: Environment and Transport Cabinet Committee – 17  
September 2014

Electoral Division: Divisions in Ashford, Dover and Shepway districts

**Summary:** This report summarises the work carried out to date to identify a potential lorry park site in Kent that will become Phase 1 of a wider initiative to address the issues caused by inappropriate overnight lorry parking and Operation Stack across Kent. In the medium to longer term it is envisaged that a network of lorry parks will be delivered. This current work seeks to identify the preferred location for the first of these lorry parks.

**Recommendations:**

That the Cabinet Member for Environment and Transport agrees:

- a) the Council's previous proposal to address the impacts of Operation Stack through the construction of one large scale lorry park at Aldington as set out in "Growth without Gridlock" (December 2010) is not pursued;
- b) the site off the M20 Junction 11 at Westenhanger is the preferred location for the construction of a lorry park as the first phase of the delivery of a network of lorry parks across Kent;
- c) scheme development work to take forward the delivery of this preferred site be progressed immediately in conjunction with KCC Property and Infrastructure Group including necessary officer or member decisions, dependent on the particular governance requirements, regarding land acquisition and securing planning consent for the project;
- d) two strands of work, one on HGV parking enforcement and the other on HGV signing in the event of Operation Stack being called, be progressed in parallel with the development work to deliver the first lorry park, and;
- e) consideration of progressing a second lorry park site as part of the network of sites across the county with a view to delivering this second lorry park within the next 5-6 years is brought back to Cabinet Committee at the appropriate time.

## 1. Introduction

1.1 Due to its position as the gateway between the UK and Europe, Kent suffers from issues caused by inappropriate overnight lorry parking as well as the

effects of Operation Stack when it is called. It has long been an aspiration of the County Council to address these issues.

- 1.2 Over the last few years the County Council has been investigating the possibility of delivering one large scale lorry park of 2,057 spaces, sufficient to cater for Operation Stack. This initiative was one of the many projects identified as a priority in the Council's 20 year transport delivery plan "Growth without Gridlock" (December 2010) and a site at Aldington requiring new slip roads from the M20 between junctions 10 and 11, was identified.
- 1.3 Over the last two years however, in light of the national economic situation, it has become evident that such a facility is unaffordable and hence undeliverable. A facility on this scale catering for ad hoc occurrences of Operation Stack could not provide the economic case to attract transport capital funding from Government, nor could a viable commercial case be made that would enable the repayment of a loan funding the facility. As a result of this, alternative solutions to tackling both Operation Stack as well as inappropriate lorry parking which happens across the county on a nightly basis, has been sought.
- 1.4 The provision of a network of lorry parks across the county in addition to the existing lorry parking provision in Kent is intended to address both these matters. This would enable sufficient parking space for overnight parking and would act, at least initially in part, as a holding area for Operation Stack when it is called thus preventing the closure of the M20 between junctions 8 and 9.
- 1.5 This report sets out how this option of a network of lorry parks will address both HGV related issues. It also outlines the work carried out to date, presents more detailed information for the three shortlisted sites, and seeks comments on this work as well as the proposed decision that the Westenhanger site at Junction 11 of the M20 should be the preferred site for the delivery of the first lorry park.

## **2. Financial Implications**

- 2.1 A decision on a preferred site will mean that capital within the Council's Medium Term Financial Plan can be drawn down to fund the next phase of detailed development work.
- 2.2 KCC has secured £12.7 million reduced rate borrowing from the Public Works Loan Board (PWLB) for the construction of this project.
- 2.3 Assessment work has shown that a lorry park would be commercially viable and subject to the chosen operating model and arrangement with a private sector operator, the lorry park could provide KCC with a revenue stream, in the medium to long term, over and above the repayment of capital and borrowing costs. This project therefore potentially offers KCC a future income stream.

## **3. Policy Framework**

- 3.1 By seeking to minimise the disruption caused by Operation Stack as well as the perception it creates that Kent is not a good place to do business, the project

will positively help the Kent economy grow. Similarly by supporting the efficient and safe movement of freight it is supporting not only the Kent, but also the national economy.

- 3.2 By minimising the negative impact that inappropriate overnight lorry parking can cause to Kent communities in terms of noise, nuisance, litter and anti-social behaviour, the delivery of a new lorry park will help tackle disadvantage in those affected communities and will help put the citizen in control.
- 3.3 Tackling these lorry parking issues is also embedded within KCC's statutory Local Transport Plan and within the Council's 20 year transport delivery plan, Growth without Gridlock.

#### **4. Other Implications**

- 4.1 An Equalities Impact Assessment will be carried out for the preferred lorry park site.
- 4.2 In relation to public health implications resulting from this proposal it is anticipated that there will be improved welfare conditions for the lorry drivers currently unable or unwilling to use official lorry parking and instead parking in more inappropriate and unofficial locations as they will be able, or potentially required to, use official lorry parking sites in the future. In addition, for those residents who currently experience the anti-social behaviour, litter and noise arising from this inappropriate lorry parking, we would expect to see an improvement in terms of public health as a result of these proposals.
- 4.3 Depending on the lorry parking operating model and any contractual arrangement with a lorry park operator, the circumstance may arise where the Council's property portfolio is expanded through KCC retaining ownership of the lorry park site itself.

#### **5. Developing a solution to Inappropriate HGV Parking and Operation Stack**

- 5.1 Preliminary investigation and development work has been carried out on how best to tackle the issues of Operation Stack and inappropriate lorry parking over a number of years. Initially, a solution to Operation Stack of a single large scale lorry park was considered. The national economic situation, along with the fact that such a lorry park would only be used on an ad hoc basis, would not raise revenue and would offer poor value for money meant that alternative solutions were investigated. In addition, while the frequency of Operation Stack cannot be accurately predicted, it has been less frequent over the last few years with Phase 2 (closure of M20 between Junctions 8 and 9) being enacted only once since December 2009. This led to the conclusion that a network of smaller lorry parks (300-500 spaces) would offer a more deliverable and realistic solution to both lorry parking issues.
- 5.2 It should be noted however, that in order to cater for Operation Stack Phase 2 which closes the M20 between J8 and J9 (up to 2,300 spaces), the full network of lorry parks would need to be in place. In reality, new lorry parks will be delivered one at a time over a period of time.

- 5.3 At present across the four main lorry parking facilities in Kent there is capacity for 880 HGVs. This suggests up to a further 1,400 spaces would be needed to hold Operation Stack traffic. Both Port of Dover and Eurotunnel are currently expanding their holding areas and while this cannot be used as overnight parking, in the event of Operation Stack, it could act as a “buffering” area for HGVs either putting off the point at which Stack is called, or holding vehicles when Stack is on. These expansions will add a total of 520 spaces.
- 5.4 Given this level of provision, to be in a position to be able to hold the expected maximum number of Operation Stack HGVs, a further 900 parking spaces would be required. This could be provided across 2 to 3 new lorry parks.
- 5.5 The above considers how Operation Stack could be addressed through a network of additional lorry parks in the county. In terms of overnight lorry parking, through discussion with the operators of Ashford International Truckstop and Stop 24 we know they are full and turning HGVs away 5-7 nights per week. Based on survey work carried out for DfT in 2005 and again in 2011, we understand that there are in the region of 300-400 HGVs parking inappropriately each night in the county. Preferred sites tend to be lay-bys and industrial/business parks.
- 5.6 We also know that traffic is set to grow meaning that lorry parking and Operation Stack issues are likely to increase over time. Forecasts by the DfT indicate that general traffic growth on the strategic road network is set to grow by 46% between 2010 and 2040<sup>1</sup>. Within this the growth rate for HGVs is anticipated to be 21.5%, equivalent to 0.8% per annum. Port of Dover and Eurotunnel both predict higher growth rates as this includes higher percentages of international freight. In addition to this, legislation on sulphur emissions from shipping is set to come into operation in January 2015 and it is anticipated that this will further increase the movement of freight vehicles through Kent as the cost of shipping increases making the shorter Channel crossings even more attractive than they currently are.
- 5.7 These factors demonstrate that demand for lorry parking will only increase in Kent.
- 5.8 For a network of lorry parks to provide a potential solution to Operation Stack, an information system on the strategic road network would need to be put in place to direct HGV drivers to holding lorry parks. Subject to approval to proceed with delivering the first of these lorry parks, a parallel piece of work will be undertaken to develop this aspect. Similarly, work would be undertaken to ensure enforcement of inappropriate HGV is maximised where possible. Both of these additional workstreams will be vital if the network of lorry parks proposal is to achieve the outcomes KCC seeks.
- 5.9 Having established the benefits of providing a network of lorry parks, over the last 12-18 months preliminary investigatory work has been undertaken. This work has included:
- Site identification and assessment;

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<sup>1</sup> DfT Road Transport Forecasts 2013

- Assessment of demand for additional lorry parking;
- Commercial viability assessment;
- Engagement with lorry park operators and freight sector to test and enhance the robustness of the work carried out, and;
- Consideration of enforcement of inappropriate lorry parking.

This work is detailed below.

## **6. Lorry Park Site Identification**

6.1 The specifications for identifying potential lorry park sites in Kent were:

- sites should be capable of catering for a minimum of 300 spaces;
- sites should be close to the main strategic corridors through Kent (M20/A20 and M2/A2 corridors);
- there should be no requirement for major infrastructure improvements in order for the site to be delivered e.g. no requirement for new slip roads or significant alternations to motorway junctions;
- extension of existing lorry parking facilities should be considered.

6.2 The starting point for this work was to review all previous work considering potential sites for lorry parks including Operation Stack lorry parking facilities in the county. This led to a long list of 54 possible sites. Discussions took place with the relevant local planning authorities (Ashford, Dover, Shepway, Swale, Tonbridge and Malling, Gravesham, Maidstone, Medway), Kent Police, the Highways Agency and a number of KCC internal consultees which resulted in 31 sites going forward for further assessment. These sites did not include the Aldington site that was previously considered for a large scale Operation Stack lorry park on the basis of high land costs and need for the construction of slip roads to the M20. The work then assessed each site against a number of criteria under the broad headings of:

- Transport (access to site, strategic network junction capacity)
- Site characteristics (topography, capacity)
- Environmental considerations (designations, AONB, heritage, drainage)
- Planning considerations (current land use, local plan allocations, proximity to residential).

6.3 This assessment gave the top sites for the two strategic corridors through the county shown in the tables in Appendix B and on the plan in Appendix C. Five sites are on the M20/A20 corridor and three on the M2/A2 corridor reflecting the higher percentage of HGV that use the M20/A20 corridor. It should be noted that for a number of these sites, their capacity could be increased if necessary.

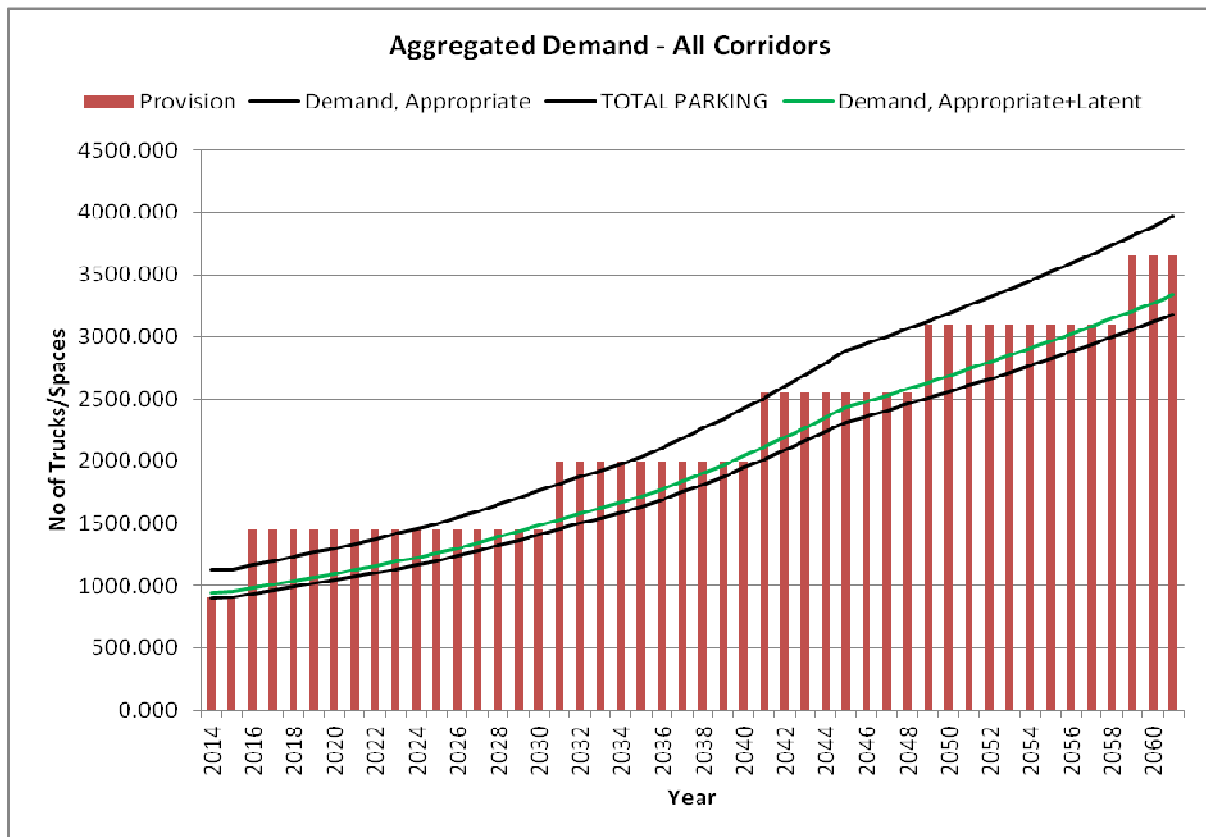
## **7. Assessment of demand for additional lorry parking**

- 7.1 The second part of the study work undertaken was to take these eight sites and carry out an outline demand and commercial analysis to ascertain to what extent each site would be commercially viable. This work centred on consideration of likely lorry driver behaviour and various factors potentially influencing lorry park use as well as assessing future HGV parking demand.
- 7.2 As part of demand assessment, pricing needs to be considered. A recent study carried out by the South East Local Enterprise Partnership showed that 78% of those responding had a preference for a charge of under £20. At the same time the key facilities required were toilets, showers, secure parking that is close to their route as well as a hot food outlet. While unofficial parking continues to happen across Kent, the fact that the existing lorry parks are busier than ever shows that the greater proportion of drivers do have parking costs covered. Evidence from lorry park operators is that the vast majority of payments are made via fuel cards or company account. Overall, 76% of drivers have their overnight stay paid for them in some form. It is the remaining 24% who are most likely to park unofficially.
- 7.3 Another factor potentially affecting demand is the UK HGV Road User Levy. As of April 2014, HGVs using UK roads are required to pay a time based charge related to vehicle weight. DfT initially anticipated an income of £20 million per annum via this charge however figures just released show that for the first 4 months of the scheme £17 million has been raised. This would demonstrate that the international freight market is healthy and growing at a rapid rate. In addition, where annual permits are purchased which give unlimited use of UK roads, this could have the implication of little incentive to keep time in the UK to a minimum and hence greater need for lorry parking in Kent.
- 7.4 As well as considering factors that may currently influence driver behaviour, work was carried out to assess the level of demand for truck parking in future (2014 to 2060). HGV volumes were obtained from the Highways Agency and growth factors were applied from the DfT, Eurotunnel and Port of Dover in order to forecast volumes to 2060. The latter two were used to account for growth in international traffic which was used as the basis for demand for overnight parking.
- 7.5 Along with data on existing HGV capacity, this information was used to develop a demand model. Table 1 below shows the outcome of this modelling work in terms of forecast HGV volumes and therefore lorry parking demand for the M20 and A2/M2 corridors. The model calculates demand for parking every 5 years and shows a 330% increase over the time period to 2060 from demand for just below 1,000 spaces to just over 3,300 spaces.

**Table 1 – Daily HGV Forecasts**

Road	Year	2015	2020	2025	2030	2035	2040	2045	2050	2055	2060
M20	Volume	6,201	7,115	8,209	9,674	11,209	13,346	15,344	16,941	18,704	20,651
	Demand	706	810	935	1,102	1,276	1,520	1,747	1,929	2,130	2,352
A2/M2	Volume	1,215	1,395	1,609	1,896	2,197	2,616	3,007	3,320	3,666	4,048
	Demand	287	330	381	449	520	619	711	785	867	957
TOTAL	Volume	7,416	8,510	9,818	11,570	13,407	15,961	18,351	20,261	22,370	24,698
TOTAL	Demand	994	1,140	1,315	1,550	1,796	2,138	2,459	2,714	2,997	3,309

7.6 Figure 1 below indicates when need for an additional (550 space) lorry park would arise over time. It can be seen from this figure that over the period to 2060, based on the growth assumptions made, there would be sufficient demand to justify 5 lorry parking sites. Given that just over 80% of HGV flow is on the M20/A20 corridor, this would suggest that the first lorry park delivered should be on that corridor.



**Figure 1 – Aggregated Daily Demand – All Corridors**

7.7 In summary, from the work carried out, it is apparent that there will be sufficient demand for a network of lorry parks in Kent over time and that there is an immediate demand for one lorry park.

## 8. Commercial Viability Assessment

8.1 Given that the bulk of funding for this project will be via a loan, it is essential that we understand the commercial viability of the proposals. Work was therefore carried out using a financial analysis tool to identify the likely rate of return (IRR) that would be expected from each lorry park and its net present value. The IRR

provides an indication of the efficiency of the investment, which can be compared to the rate of return from other investments. The net present value provides an estimate of the magnitude of return.

- 8.2 As the construction and operation of the lorry parks is potentially a commercial venture, the discount rate of 7.5% based on Treasury Green Book guidance has been used. The financial analysis is based on a snapshot of each of the sites being built in 2016 and not on the basis of the sites being built on a sequential basis.
- 8.3 This work used a number of assumptions including HGV growth forecasts, lorry parking demand forecasts, cost of construction and operation, pricing strategy, discount rates, life of lorry park and operating period. Assumptions include a parking charge of £15 per night reflecting the basic but essential service provision envisaged, and added value revenue derived from assumptions of £3 spend for day parking and £6 per night parking. These estimates are considered to be reasonably conservative. The costs within the model include capital, operating and maintenance costs.
- 8.4 Outputs of this work demonstrated considerable variation between sites for the 25 and 40 year investment periods in terms of Internal Rate of Return and Net Present Value. The next phase of work was to consider this information along with the site assessment work to determine a shortlist of sites.

## **9. Detailed Development Work for Shortlisted Sites**

- 9.1 Considering both the site assessment and commercial viability work led to a further shortlist of the three sites below. These site locations are shown in Appendix D, E and F.
  - Westenhanger, adjacent to Stop24, M20 J11
  - Extension to Ashford International Truckstop
  - White Cliffs Business Park, Dover.
- 9.2 The White Cliffs Business Park site was the best performing M2/A2 corridor site when considering both site assessment and commercial viability although performing less well than the M20/A20 corridor sites. While the Lympne site performed well under the 40 year assessment scenario the limitation on site capacity and the 2.8 miles from the strategic road network including passing through a small community were key factors in its exclusion from the final short list of 3 sites. Westenhanger and Ashford International Truckstop Extension were included as the top performing M20/A20 sites.
- 9.3 Further assessment work has been carried out which included preliminary site layout designs to better determine site capacity, desktop environmental impact for each site for which details are provided in Appendix G, and site specific commercial analysis rather than the corridor assessment approach that had previously been used. This additional work has helped develop more detailed costings for each site and is presented in summary in Table 2 below.
- 9.4 The additional work on site design considering drainage, landscaping, visual impact and environmental constraints has reduced the number of parking



spaces feasible within the site areas being considered. An updated commercial assessment using reduced parking space numbers to keep this within the value of the PWLB loan was undertaken. This commercial assessment also used an overnight parking charge of £20 as discussions with the market has gauged that this level of charge will be more realistic. The outcome of this analysis is also shown in Table 2 below.

- 9.5 To support this additional work, further engagement has taken place with the relevant district authorities, Kent Police and Fire and Rescue as well as the operators of Stop24 and Ashford International Truckstop. These discussions have again, helped provide robustness to the site assessment and financial analysis work.

Table 2 Summary of Shortlisted Sites							
Site	No. Spaces	Land Cost*	Construction Cost	IRR**	NPV**	Traffic constraints	Planning/environmental constraints
Westenhanger	300	£422k	£10.8m***	23.5 – 23.8%	£6.9m-£9.4m	Access from M20 J11 which is under capacity. No additional highway works needed	Key issues likely to be visual and landscape impacts due to location immediately adjacent to and within the setting of Kent Downs AONB. Potential cultural heritage impacts. Land currently unallocated in Local Plan.
Extension to Ashford International Truckstop	278	£4.8m	£9.4m	17.6 – 18.2%	£4.7m-£6.7m	Access 1.4 miles from M20 J10 which is over capacity at peak times	Current Local Plan review may determine lorry parking as appropriate land use for this location. Currently zoned for mixed use development. Part of land Flood Zone 2 (1 in 1,000 year flooding). Land owner also owns Truckstop and is willing to expand operation in short and medium term but wishes to retain ownership. Significant ecology potential therefore considerable mitigation likely.
White Cliffs Business Park	237	£2.5m	£10.3m	8.7 – 10.8%	£526k-2.3m	Access off A2 into business park but need to ensure no HGV access through Whitfield	Potential visual impact of site particularly from Western Heights. Likely increased capacity to Southern Water sewer required. Potential question of compatibility of lorry park use within business park.
<p>IRR = Internal Rate of Return    NPV = Net Present Value  * Based on open market value  ** Figurers represent 25 year and 40 year loan period and £20 overnight charge  *** Plus £61k for footpath connection or £2.6m for railway pedestrian overbridge if connecting to the existing Stop24 site</p>							

9.6 Overall, it can be seen that the Westenhanger site has the highest IRR and NPV of the 3 sites. The main reasons for this is it will be less expensive to deliver and provides marginally more spaces than the other 2 sites and hence provides a greater return in relation to cost. This will be aided by the fact that the Westenhanger site is in an ideal location in terms of access to the strategic road network. Similarly worth noting is the fact that the land owner of the Ashford site has indicated that they wish to retain ownership with a view to expand the site in terms of future development. This site therefore is only likely to provide a short to medium term option whereas there is no similar constraint at Westenhanger making it the preferred site for the first lorry park providing a longer term investment.

9.7 Key considerations for the Westenhanger site are likely to be visual and landscape impact of a lorry park in this location particularly in relation to the Kent Downs AONB.

## **10. Potential Operation Models**

10.1 The recent engagement with Stop24 and Ashford International Truckstop, as well as two other lorry park operators, has assisted with work to consider future operating models for the lorry park. These include:

- KCC selling all interests in the lorry park to an operator,
- KCC entering into an agreement with an operator paying the Council a future income, or
- KCC retaining ownership and operation of the lorry park.

10.2 Each option has varying levels of risk for KCC and any private sector partner. Each option also has differing trading and tax implications which also need to be considered in detail. This work, in collaboration with KCC Finance Team, will be advanced in more detail once a preferred site is chosen as part of overall scheme development.

## **11. Financial review**

KCC Finance Team has undertaken an initial review of the financial modelling analysis and support the methodology used and the resulting recommendation put forward. However this is subject to further detailed analysis, including sensitivity analysis, being undertaken in relation to the operating model to be adopted and the revenue implications for KCC during the initial years of the project.

## **12. Next Steps**

12.1 Once a preferred site is selected, the next phase of work will commence that will include land acquisition, scheme design, environmental impact assessment and a number of other assessments that will support the submission of a planning application for the preferred site. The following outlines the key milestones:

- Public consultation on preferred site – January - February 2015
- Preliminary design completed - November 2015
- Planning consent – June 2016

- Detailed design completed – December 2016
- Construction start on-site – October 2017
- Construction complete – May 2018

12.2 In parallel with the lorry park development work it is proposed that 2 additional strands of work are progressed. These are:

- a) HGV Parking Enforcement – in conjunction with the district authorities who have delegated authority for parking enforcement, work to ensure that everything that can be done to effectively enforce on inappropriate lorry parking in the county is being done, and;
- b) Strategic Road Network signing for Operation Stack – this project will work with the Highways Agency and other partners to develop an information system that will direct HGV drivers to lorry parks in the event of Operation Stack being called. The objective of this is to avoid the situation of the M20 being closed to accommodate HGV parking.

12.3 Following on from the delivery of the first lorry park, on the assumption that the Council continues to pursue this strategy, work on delivering the second in the network of lorry parks would be undertaken. Given that Local Growth Funding is available until 2021 it would seem appropriate to begin the process to bid for funding for the next lorry park in the next 18-24 months. At the same time it would be hoped that the Government would have made its decision on the preferred corridor for a new Lower Thames Crossing which could be a significant influence on the location of a second lorry park. Furthermore, Local Plan reviews will have moved on which may also help influence the location of a future lorry park. The current intention would be to deliver a second lorry park within the next 5-6 years.

### **13. Conclusions**

13.1 This report sets out the reasons why the option of one large scale lorry park to tackle the impacts of Operation Stack as set out in Growth without Gridlock (Dec 2010) is no longer being pursued and instead the option of delivering a network of small scale lorry parks across the county to tackle both the impacts of inappropriate lorry parking as well as in part, Operation Stack, is being investigated.

13.2 The report summarises the considerable work that has been undertaken in identifying potential lorry park sites across the county. This work has sought to establish the suitability of sites for a lorry park from the planning, environmental and transport perspectives as well as considering the commercial viability of each. It recommends that the first of the lorry park sites to be delivered should be the site at Westenhanger adjacent to M20 Junction 11.

13.3 In parallel to the lorry park development work it is proposed that 2 other strands of work are undertaken. The first is working with the district authorities to ensure we are doing all we can in terms of HGV parking enforcement to minimise inappropriate overnight lorry parking, and the second is to establish a strategic road network signing system that would direct HGVs to lorry parks when Operation Stack is called.

13.4 Finally, it is intended that a second lorry park in the network across the county be delivered within the next 5 – 6 years. Work to progress this will be brought back to Cabinet Committee at the appropriate time.

## **14. Recommendations**

That the Cabinet Member for Environment and Transport agrees:

- a) the Council's previous proposal to address the impacts of Operation Stack through the construction of one large scale lorry park at Aldington as set out in "Growth without Gridlock" (December 2010) is not pursued;
- b) the site off the M20 Junction 11 at Westenhanger is the preferred location for the construction of a lorry park as the first phase of the delivery of a network of lorry parks across Kent
- c) scheme development work to take forward the delivery of this preferred site be progressed immediately in conjunction with KCC Property & Infrastructure Group including necessary officer or member decisions, dependent on the particular governance requirements, regarding land acquisition and securing planning consent for the project;
- d) two strands of work, one on HGV parking enforcement and the other on HGV signing in the event of Operation Stack being called, be progressed in parallel with the development work to deliver the first lorry park, and;
- e) consideration of progressing a second lorry park site as part of the network of sites across the county with a view to delivering this second lorry park within the next 5-6 years is brought back to Cabinet Committee at the appropriate time.

## **15. Background Documents**

15.1 Kent Lorry parks Feasibility Study, Final Site Assessment Report, Aecom, 28 February 2014

15.2 Kent Lorry Parks Feasibility Study, Demand Analysis and Business Model Report, Aecom, 28 February 2014

15.3 Kent Lorry Parks Feasibility Study – Phase 2 Report, Aecom, 28 February 2014

## **16. Contact details**

Report Author:

Ann Carruthers, Transport Strategy Delivery Manager  
03000 413347

[ann.carruthers@kent.gov.uk](mailto:ann.carruthers@kent.gov.uk)

Relevant Director:

Paul Crick, Director of Environment, Planning and Enforcement  
03000 413356

[paul.crick@kent.gov.uk](mailto:paul.crick@kent.gov.uk)

Appendix A Proposed decision sheet

Appendix B Ranked Shortlist following Site Assessment

Appendix C	M20/A20 and M2/A2 Top sites Plan
Appendix D	Westenhanger Site Location Plan
Appendix E	Ashford International Truckstop Extension Site Location Plan
Appendix F	White Cliffs Business Park, Dover Site Location Plan
Appendix G	Summary of Environmental Constraints for 3 shortlisted sites