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Date: 16 September 2014

Cllr. Paulina Stockell  
Chair  
KCC Environment and Transport Cabinet Committee  
County Hall  
Maidstone  
Kent  
ME14 1XQ

Dear Cllr. Stockell

## **Environment and Transport Committee – Lorry Park Network (Phase 1)**

I write in response to report 14/00055 Lorry Park Network Phase 1 that is due to be considered by the Kent County Council Environment and Transport Committee on 17<sup>th</sup> September 2014.

It is noted that the report suggests a number of recommendations from the Committee to the Cabinet Member for Environment and Transport, Cllr. David Brazier and that the following recommendation is included within the report :-

*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 network of lorry parks across Kent.*

Whilst acknowledging the need for a solution to Operation Stack and overnight lorry parking in Kent, the District Council wishes to express the strongest possible concern regarding this recommendation and asks that both the Cabinet Committee and the Cabinet member take the following into account. These views are consistent with those previously expressed in the letter from Chris Lewis, Head of Planning, to the consultants Glennly LLP, dated 20<sup>th</sup> January 2014.

1. The appropriate mechanism for assessing the development needs and identifying site specific allocations within a particular area is the local plan process. The Shepway Core Strategy Local Plan was adopted on 18<sup>th</sup> September 2013 and along with a number 'saved' policies from the Shepway District Local Plan Review 2006 forms the development plan for the district. The proposed site at Westenhanger is not allocated for development in the Core Strategy Local Plan or as a 'saved' policy. Neither is there a planning policy for Shepway requiring a lorry park in this location.
2. A lorry park on this site, would be likely to have a considerable visual impact and would be built on highly visible greenfield land. It would be an intrusion into open

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countryside. Although not within the North Downs AONB, the site lies adjacent to it. Although no landscape assessment has been provided, it is likely that there will be clear views of the lorry park when viewed from the AONB, looking southwards from the North Downs ridge, and when looking at the AONB across the site from the south.

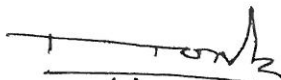
3. Development when sited in open countryside, either in or adjacent to an AONB, needs very careful consideration even where the general principle of development in such a location is considered to be acceptable in terms of adopted planning policy. It is considered that, in particular, a lorry park on the scale proposed has the potential to cause considerable harm. The proposal will consist of approximately 300 lorries parked on an open site, along with associated amenity and other buildings as well as floodlighting, signage etc. Whilst it may be possible to reduce the visual impact through structured landscaping the nature of the proposal is still likely to result in an incongruous form of development. In short, even if the general principle of development were to be found suitable in this location having followed due process, it is difficult to see how a high quality design solution could be achieved for a lorry park that is capable of making the proposal acceptable, when assessed against both local and national planning policies.
4. Whilst the planning issues relating to the Westenhanger site have, to some extent, been acknowledged in the report they are dealt with in a superficial way in Table 2 and appendix G and in paragraph 9.7. The District Council does not consider that they have been given sufficient weight when assessed against other criteria such as the Net Present Value (NPV) and Internal Rate of Return (IRR) and general accessibility of the site. Given the fundamental role of the planning system in determining whether a development is able to proceed much greater significance should have been given to the identified planning constraints and issues within then report.
5. With regard to the NPV and IRR being higher than for the other two shortlisted sites, and therefore a key factor in determining the recommendation, it is assumed that this is in part due to the considerably lower land cost for this site compared to the other shortlisted sites (£422,000 as opposed to £4.8 million and £2.5 million). This lower land cost represents an acknowledgement of the current planning status of the site as previously expressed. It also understood that no agreement has been reached with the landowner(s), for KCC or another operator to acquire the site, which is clearly necessary for the scheme to proceed and brings into question significant questions about its deliverability. It is also noted that the land cost, as set out in the report, provides limited up-lift from the current agricultural land value and given that the proposal has the potential to blight the current Hillhurst Farm complex.
6. The District Council has commenced the development of the Shepway Places and Policies Local Plan, that will, on adoption, set out a number of site specific allocations across the District. An initial 'regulation 18' consultation is scheduled to commence in November 2014. This provides an opportunity to take forward in a comprehensive way, the objectives of the Core Strategy and a number of other strategies and evidence base documents in order to develop an appropriate mix

of land use allocations, including potentially those related to lorry parking. We look forward to working with Kent County Council throughout the development of this document in order to identify the sites necessary to meet the economic, social and environmental needs of the District.

7. This Council does not consider that Kent County Council has adequately assessed alternative sites across the District in sufficient detail.

I trust these views will be given the appropriate level of consideration and look forward to hearing of the decision in due course. Should you wish to discuss these matters further, please do not hesitate to contact me so we can arrange a meeting.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Monk', with a horizontal line underneath.

**Cllr David Monk**  
Leader of the Council

CC. Angela Evans (Committee Clerk, Kent County Council)