

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

21 January 2016

Dear Sir

Consultation: Managing freight vehicles through Kent

Transport Focus is the independent consumer watchdog representing the interests of transport users, including since March 2015 users of the motorways and major 'A' roads in England.

At the height of disruption to cross-channel traffic in July 2015, Transport Focus was concerned about the impacts of Operation Stack, not only on cross-Channel journeys but domestic travel within Kent.¹ The effects of Operation stack were felt by local transport users as well as continental traffic. There was disruption to scheduled bus services, local businesses and day-to-day functioning within communities. While Manston Airport is now available as an interim measure, it is important that there is a permanent solution.

Transport Focus has also examined the quality and consistency of online information provided to road users during Operation Stack.² This was shared with the lead agencies, cross-Channel operators and road haulage industry representatives in August 2015. One of our key findings was the lack of a 'single source of the truth' when it came to information provision.

We therefore welcome Highways England's consultation on proposals to create a purpose-built lorry area adjacent to the M20. However, the consultation appears to be aimed mainly at the local community in Kent – it is vital that Highways England ensures that there is also effective consultation with road users, including the likely

¹ Transport Focus letter to Highways England:
<http://www.transportfocus.org.uk/research/publications/operation-stack-correspondence-july-2015>

²Online information for road users during Operation Stack:
<http://www.transportfocus.org.uk/research/publications/online-information-for-road-users-during-operation-stack>



customers of the lorry facility once it is open. The latter will need to include both UK and European HGV operators and their drivers.

With regard to geographic location, Transport Focus has no preference between the two sites. The crucial thing is that whichever is selected meets the needs of lorry drivers and their employers, and facilitates best use of available cross-Channel capacity available at both Dover and Eurotunnel. Once fully open, there should be an explicit commitment that no section of the M20 (or other parts of the Strategic Road Network) should in future be closed in order to queue lorries.

Given the scale of the project, the site should be available for use as much of the time as possible. We therefore favour the option for both a general disruption and a combined truck-stop as detailed in Section 13, Alternative 4 of the consultation. We again emphasise that detail about the facilities to be offered at the site, including any fees to be charged, should be decided only after significant user input. There is no point in building a facility that does not meet lorry drivers' or their employers' needs – there is every danger that they simply won't use it.

TAP (Traffic Assessment Project) on the approaches to the Port of Dover via the A20 has been in use almost daily in recent months. Transport Focus staff have visited the area recently and seen the less-than-ideal situation first-hand. We therefore recommend that Highways England considers carefully how the proposed lorry area will reduce or eliminate the need for TAP. It is likely that road users will be dissatisfied if TAP remains in regular use once the lorry area is up and running.

We also suggest that Highways England considers further how HGVs will be filtered off the M20 into the proposed site with minimum disruption to other users of the motorway.

Transport Focus is currently carrying out research into road users' experiences of and needs from roadside facilities in general. There will undoubtedly be insight from this that will help inform the ultimate design of the lorry area. Furthermore, this Spring Transport Focus will conduct research among HGV drivers using the Port of Dover and Eurotunnel to understand their views about location and facilities required at the lorry area, as well as drivers' experiences of TAP. It was not possible to conduct this work before the closing date of this consultation, but we will provide the findings as soon as they are available.

Yours faithfully

Guy Dangerfield
Road User Director