



# HGV Parking Facility Need Assessment

November 2021

Ref: 220053r\_draft ver6 final



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## 1. INTRODUCTION

- 1.1 Hodgetts Estates (HE) (also referred to herein as 'the applicant') are submitting proposals for a new large scale warehousing scheme on land to the north east of Junction 10 of the M42. Around 100,000 square metres of new high-bay logistics and industrial floor space is planned for the site. Incorporated into the scheme is a new HGV parking area capable of accommodating up to 150 vehicles. The new parking area will be able to provide drivers with facilities for short term parking (e.g.,, statutory driving breaks, access to toilets and food, etc..) and longer-term overnight parking requirements..
- 1.2 *MDS Transmodal* were commissioned by HE to undertake an independent technical assessment of the planned HGV parking facility. This was to identify the overall need for HGV parking facilities, whether the Junction 10 site is a suitable location and if the planned facilities meet the requirements of national policy and legislation, as well as HGV drivers. This report presents our findings on this matter as set out in the following sections:
  - Section 2 outlines details of the proposed HGV parking facility;
  - Section 3 details the over-arching requirements for HGV parking, demonstrating on a qualitative basis the underpinning need case for new facilities where HGVs can park safely and drivers access appropriate amenities;
  - Section 4 sets out planning policy and Government support for the proposed scheme, as well as a relevant recent appeal decision from North Warwickshire. It also reviews two recent studies undertaken by the Department for Transport (DfT) on the demand for HGV parking facilities;
  - Section 5 details the type of parking facilities required by road haulage operators and HGV drivers;
  - Section 6 sets out the quantitative need case for a HGV parking facility in the immediate vicinity of the M42 Junction 10, including a number of specific demand assessments that have been undertaken;
  - Section 7 demonstrates why the proposed site is a suitable location for hosting HGV parking facilities. It also sets out details of potential alternative parking provision in the immediate area and summarises why these do not adequately address the identified qualitative and quantitative need; and
  - Section 8 provides a summary and draws conclusion on the above
- 1.3 Other than Tamworth Motorway Service Area (MSA), there are no formal HGV parking facilities in the immediate vicinity of Junction 10. As will be demonstrated below, this has resulted in significant overnight HGV parking at inappropriate locations in the wider Tamworth area and along the A5 corridor.

1.4

1.5 Furthermore, there is a clearly identified need for the provision of additional HGV parking capacity in the area. The site meets the criteria defining a suitable location for HGV parking to a high level and the planned parking facilities are those required by road haulage operators and drivers.

recruitment/retention in a sector where there is a recognised shortage of drivers.



## 2. THE PROPOSALS

- 2.1 An indicative layout plan for the proposals, including the HGV parking facility is included at Appendix 1.
- 2.2 The *Environmental Impact Assessment (EIA)* development parameters for the overall site, set out the following information in relation to the HGV parking facility:
  - Up to 150 spaces for both overnight and short-term lorry parking; and
  - An amenity building, around 400 square metres in size, for the provision of driver amenities, including a shop, restaurant/takeaway, laundry, gym, changing facilities, showers and toilets.
- 2.3 Further details of the proposed overnight lorry parking facility are set out in the submitted *Design & Access Statement* and *Design Guide* prepared by Chetwoods Architects.
- 2.4 In summary, it is proposed that the overnight lorry park will incorporate the following elements:
  - A new purpose-built secure HGV and coach parking facility with free parking, 24hr security within the site and driver welfare, incorporating shop, restaurant/café, changing rooms, showers, WCs, gym and laundry;
  - Security measures to include gated and fenced parking area, with gatehouse and barriercontrolled entry and exit; and
  - The proposals also allow for reprovision of the existing lay-bys on the A5 trunk road, which are currently used for ad hoc HGV parking and are due to be lost as part of the wider development proposals, within the new secure facility.



## 3. QUALITATIVE NEED FOR HGV PARKING FACILITIES

3.1 The road haulage industry is in the private sector and operates on purely commercial terms, with operators openly competing for traffic with each other (and sometimes with other modes, such as intermodal rail freight). While significant parts of its economic activities take place on private premises (e.g., at distribution centres, factories or ports), it is heavily reliant on access to publicly funded infrastructure, namely the highway network, in order to operate and generate revenue. The provision of HGV parking facilities has traditionally been viewed as a responsibility of highway network managers.

#### The Need for HGV Parking

- 3.2 A HGV's normal day-to-day activities can essentially be divided into three categories, namely:
  - 1. Being physically driven on the highway network, either carrying goods between their collection origin and delivery destination or running empty (empty re-positioning after a delivery and before the next goods collection or moving to/from maintenance workshops).
  - 2. Stationary periods for operational reasons. This essentially covers three activities:
  - Loading goods at their origin and discharging goods at their delivery destination;
  - Undergoing maintenance (both planned services/inspections and correcting faults); and
  - When parked at depots during periods of inactivity, such as at weekends.

In most cases, these stationary periods will take place on private land away from the public highway. The delivery and collection of cargo will generally occur at dedicated facilities, such as a factory, port, rail freight terminal or distribution centre. The main exception in this case is the delivery of foods into urban areas, where road-side parking is sometimes required during the delivery process. The Operator Licencing<sup>1</sup> system stipulates that HGVs have to be parked at a suitable operating base or depot (located on private land) when not in use.

- 3. Stationary periods for non-operational reasons.
- 3.3 The requirement for dedicated HGV parking facilities therefore concerns this third category, as they normally occur when HGVs are away from their home operating base or depot. There are three broad reasons why HGVs need to park for non-operational reasons and these are described below.



<sup>&</sup>lt;sup>1</sup> Operators of goods vehicles over 3.5 tonnes gross vehicle weight which move cargo for commercial purposes are required to hold an Operators Licence (often referred to as an 'O' Licence).

#### **Statutory Break and Rest Periods**

- 3.4 The amount of time that HGV drivers can drive and work is strictly regulated by the *EU Drivers Hours Regulations* or the *GB domestic rules*.
- 3.5 The EU Driver Hours Regulations are the principal set of laws governing day to day working time and break/rest period requirements. They cover drivers of most goods vehicles over 3.5 tonnes gross vehicle weight (gvw) when driving anywhere in Great Britain and Northern Ireland, the EU, an EEA country or Switzerland. Following the end of the Brexit transition period on 1 January 2021, they transposed into British law (they could now be amended for domestic driving only though they would continue to apply for international trips). The Regulations impose the following mandatory breaks and rest periods:
  - A break period of at least 45 minutes must be taken after 4.5 hours driving;
  - A driver must have at least 11 hours *daily rest* between working shifts i.e., between finishing work one day and starting the next day. This may be reduced to 9 hours three times per week; and
  - A driver must have at least 45 hours *weekly rest* between finishing work one week and starting work the next week. This may be reduced to 24 hours if a driver is away from his/her home base, however a driver must compensate for any reduced weekly rest periods by taking additional rest periods over subsequent weeks
- 3.6 Drivers of freight vehicles under 3.5 tonnes gvw follow the *GB domestic rules*, which limits daily driving to a maximum of 10 hours. The requirement to take break periods under the *Working Time Directive* rules also applies.
- 3.7 Ideally, driving break periods will coincide with the collection or delivery of cargo on private land, providing the loading/discharge process is not performed by the driver<sup>2</sup> (the driver remaining in the cab or accessing facilities at the collection/delivery location). However, due to the nature of HGV operations, these activities do not always coincide. Likewise, statutory break periods would ideally coincide with time spent at the operator's depot, but again for operational reasons this is generally never the case. Consequently, there is often a need for drivers to park their vehicles while out on the road so that driving breaks can be undertaken. Break periods can be taken in the vehicle, however it must be stationary and the engine switched off if, as is generally the case, the driver is operating the vehicle alone (when vehicles are double-staffed, drivers can undertake break periods while the vehicle is driven by the second driver).



<sup>&</sup>lt;sup>2</sup> Time spent loading or discharging cargo cannot contribute towards a driving break

- 3.8 Additionally, if drivers cannot return to their home depots at the end of a working shift, then there is a need to take the *daily rest* requirements while out on the road. Again, drivers require suitable places to park, as in this case rest periods can be taken in a vehicle but it <u>must</u> be stationary and the engine switched off. In most cases drivers would use the vehicle bunk to sleep. The mandatory daily and weekly *rest* periods are for drivers to "freely dispose of his or her time"; employers therefore cannot request that drivers undertake other work during this time (e.g.,, vehicle loading/unloading, office/administrative tasks, briefings with management or training sessions etc..).
- 3.9 While *daily rest* periods are predominantly taken over-night, statutory driving *breaks* take place across the 24 hour period (drivers on night shifts also need to take breaks, albeit 'demand' is higher in the daytime when more vehicles are on the road). Parking to undertake driving break periods will be short-term in nature (i.e.,, up to 1 hour). Conversely, statutory daily rest periods will be long-term (i.e.,, at least 9 hours, as described).

#### Waiting for Delivery/Collection Time Slots

- 3.10 Distribution centres and factories generally operate 'time window' systems for the inward delivery of goods. For example, a distribution centre will often plan inbound deliveries during the daytime in order to replenish stock before that evening's outbound deliveries. Such a system also spreads inbound deliveries over an extended time period. Otherwise, all inbound deliveries could arrive at the same time, causing congestion both inside and outside the distribution facility. A vehicle delivering to such a facility will usually be allocated a time slot during which the goods must be delivered, and in many cases the time slot can be as tight as plus/minus 10 minutes.
- 3.11 Missing an allocated time slot can result either in deliveries being rejected or the vehicle having to wait a considerable period of time before the load will be handled. In view of journey time un-reliability issues (highway network congestion), road haulage operators consequently factor-in additional recovery or buffer time into their operating schedules to ensure that vehicles arrive on time and meet the allotted time slot. During incident-free journeys, this means that HGVs arrive early for their allocated time slot.
- 3.12 When this occurs, there is a consequent need for drivers to park HGVs a short distance away from the delivery location and wait until their allotted delivery times. Early arrivals are generally not accepted; due to internal space issues most factories and distribution centres do not normally provide pre-delivery parking areas for vehicles which arrive early. Where feasible, drivers will plan to take their statutory break requirements while waiting for a delivery time slot. However, combining the two in this manner will not always be the case from an operational perspective.



3.13 HGV Parking while waiting for delivery time slots will normally be short-term in nature (i.e.,, 1 - 2 hours).

#### Access to Amenities: Driver Welfare

3.14 As with all employees, HGV drivers are entitled to a healthy and safe working environment. This includes the ability to undertake break and rest periods (as noted above these are statutory) and to take them away from the point of work (i.e.,, driving cab), just as office or factory workers would have access to a staff canteen, kitchen or mess room. Alongside this, access to basic amenities during those periods, such toilets and washing facilities and food and drink refreshments, is also a requirement. While drivers are out on the road, it is obviously not possible to access such facilities that may be available at their home depots. Consequently, there is a need for drivers to park their vehicles in order to gain access to such amenities.

#### Parking for Non-operational Reasons – Locational Implications

- 3.15 The need to park HGVs for non-operational reasons, as described, clearly implies a requirement for some form of purposely designed 'parking facility' connected to but located off the public highway, where HGVs can be parked in an appropriate manner while providing drivers with access to suitable amenity facilities. *Section 5* below discusses in more detail the key functional requirements for such facilities.
- 3.16 The first two reasons of parking need, namely *breaks/rests* and *waiting for delivery time slots*, could in the first instance suggest two different locational characteristics for HGV parking facilities. Drivers needing to park in order to comply with *driving break* or *daily rest* requirements are more likely to require parking facilities located a short distance from access/egress points on the strategic highway network (i.e.,, junctions). This consequently ensures that any 'diversion' away from the strategic highway network is minimised.
- 3.17 Conversely, drivers arriving early for a factory or distribution centre delivery time slot will require parking facilities within a few minutes drive of their final delivery destination. This implies a need for parking facilities located close to or within major freight generating locations, such as an industrial estate or logistics park, to aid time slots being met in a timely manner and to act as an incentive for drivers to desist from parking informally close to their ultimate destination.
- 3.18 However, when considered further it is often the case that major freight origins/destinations, particularly large scale distribution centres, are located close to junctions on the strategic highway network. This is clearly the case with the area surrounding Junction 10 of the M42 Motorway, which is in close proximity to Relay Park, Centurion Park, St Modwen Park



Tamworth and Birch Coppice Business Park amongst others. Consequently, HGV parking facilities located a short distance from access/egress points on the strategic highway network should therefore be in a position to cater for both parking needs simultaneously. Driver/vehicle throughput would also be maximised, which will be important should revenue need to be raised to cover running costs.

3.19 The third category of parking need i.e.,, access to amenities, would generally be undertaken while HGVs are parked due to the other two requirements e.g.,, drivers would visit the toilet and purchase a coffee while parked for a statutory driving break. In this case, the level of amenity provision at a parking facility will be related to whether it is providing short-term (breaks/waiting time) or long-term (daily rest) parking need (rather than location dependent). Section 5 below sets out the differing requirements alongside the spatial implications. However, statutory driving *breaks* and *waiting for delivery time slots* take place across the 24 hour period. It is therefore vital that suitable sites are located where access is available 24 hours a day.

#### **Consequences of Parking at Inappropriate Locations**

- 3.20 Given a deficit of suitable purposely designed off-road lorry parking capacity in a particular area, this effectively forces HGVs to park inappropriately on the public highway or at other unsuitable locations. The environmental consequences of this, for vehicles which can be up to 18.5m in length, include:
  - Parking on the side of a highway and as a result impeding traffic flow, possibly causing congestion;
  - Parking at locations which are incompatible with the noise pollution (running engines, refrigeration units etc.) emitted by lorries e.g., residential area;
  - Causing damage to pavement or footpath infrastructure;
  - Parking vehicles at locations which are not suited to the visual intrusiveness of lorries; and
  - Environmental impacts from litter and, given the absence of toilet facilities, human waste.
- 3.21 In addition, security issues and the concept of 'lorry crime' need to be addressed. Organised criminals have in the past targeted freight vehicles, or to be more exact the contents of vehicles, as a source of goods from which to make money. Freight vehicles carrying high value and retail goods have been major targets, particularly goods which are then difficult to trace and can easily be re-sold on the black market or popular internet auction sites. Goods vehicles parked at isolated lay-bys or patches of waste land are obviously an easy target for criminals. In addition to theft, the sale of illegal substances and prostitution have also been noted as issues related to parking at unofficial sites. To illustrate the point locally, Appendix 12 shows



reports of lorry crime in the Tamworth/A5 corridor area from a local newspaper and the truck park guidance app 'Motorway Buddy'.

- 3.22 The provision of off-road lorry parks with some form of security measures in place can thus be seen as a major weapon in the fight against such criminal activity. At a basic level, this would include perimeter fencing, night-time lighting and CCTV, alongside the 'security' in numbers that comes with numerous freight vehicles being parked together. Barrier controlled entry should be considered for larger over-night parking.
- 3.23 Less obvious consequences of a lack of suitable parking facilities concerns the general working environment of HGV drivers. For most employees based at one permanent work site, the ability to take break periods away from their work position (e.g.,, desk), purchase/consume food and drink refreshments and visit the bathroom is taken for granted. However, for goods vehicle drivers, the availability of such basic amenities is more problematic. Even if a driver finds a road-side location where parking is possible without any serious environmental consequences e.g., a lay-by or road within an industrial estate, the driving cab is often the only place where the break period can be taken and there are unlikely to be toilet facilities and food/drink refreshments available nearby. In addition, not being able to access food or drink refreshments could potentially impact on a driver's ability to drive his/her vehicle in a safe manner. Further, many roadside outlets selling food and drink (e.g.,, Costa, KFC etc..) are often accessible only by private car. For overnight rest periods, while modern HGV cabs have heated bunks for sleeping, the ability to access shower and breakfast facilities (again taken for granted by most employees asked to work away from home) is also important in this respect. This issue and its implications are discussed in more detail below.

#### **HGV Driver Recruitment Issues**

- 3.24 Since Summer 2021, supply chain reliability issues have affected a number of industry sectors. This has particularly manifested itself (certainly in the eyes of the general public and mainstream media) at the end of the supply chain in the retail sector, where a variety of product lines have experienced (and continue to experience) periods of temporary unavailability. The grocery sector has possibly borne the brunt (in terms of product outages) as it relies on just-in-time deliveries due to the short product shelf-life of many fresh foods.
- 3.25 In late September 2021, a shortage of diesel/petrol at a small number of filling stations (due to driver unavailability) resulted in a round of panic-buying of fuel, which subsequently generated a much wider shortage of fuel nationally (due to a shortage of HGV drivers the fuel companies were unable to meet the sudden spike in demand). Armed Forces personnel were subsequently drafted in to assist making deliveries to forecourts. By mid-October 2021, the Port of Felixstowe conceded that they were experiencing difficulties in moving containers out of the port (they subsequently stopped receiving in-bound empty containers due to a lack of



space). Again, driver shortages were cited as one of the reasons. While there are a number of factors at-play, including global 're-stocking' post Covid-19, a major contributory issue is the now widely recognised significant shortage of qualified HGV drivers (both Class C and Class  $C+E^3$ ). This has been widely reported by both the specialist trade and mainstream media.

- 3.26 The road haulage sector has for a number of years struggled to recruit, train and retain sufficient numbers of qualified HGV drivers. According to *Logistics UK's* <sup>4</sup> most recent labour market survey (published in October 2020), the logistics industry currently has around 76,000 vacancies for HGV drivers, and there were 25,000 fewer drivers employed in Q2 2020 compared with the same period in 2019 (decline of 6.7%). The average age of a HGV driver is now 49.6 years (up from 47.9 years in 2019) and 52.4% of drivers are in the 45-59 years age range. Only 18% of HGV drivers are under 35 years old. The previous labour market survey from October 2019 estimated that there were 59,000 vacancies, and by August 2021 Logistics UK were subsequently estimating that the driver shortage had reached <u>90,000 vacancies</u> i.e.,, a worsening position. More recently, the *Road Haulage Association (RHA)* has reported that the figure maybe around <u>100,000 vacancies</u>. Another key (and related) challenge is the recruitment of more female drivers into an industry which is still predominantly male (only 9.4% of HGV driving test applicants in 2020 were women).
- 3.27 A number of factors have contributed to this shortage. Historically, road haulage operators had no requirement to provide their own in-house driver training as they could rely on a steady supply of ready qualified drivers. However, over the past 15 years this inward supply of qualified drivers from domestic sources has reduced significantly, coupled with a reluctance by hauliers to fund driver training themselves fearing that drivers will subsequently leave for other operators once fully qualified.
- 3.28 In particular, the Armed Forces were traditionally a significant source of drivers (retiring personnel with HGV driving qualifications would find new employment in the logistics sector). However cuts to numbers serving in the Forces has led to a reduction in those leaving with the appropriate skills and qualifications. Also, many would-be drivers would traditionally self-fund their training. This was when only one driving test was required to be able to drive articulated HGVs (assuming the driver held a standard private car driving licence). Today, three driving tests are now required plus completing a professional competence qualification in order to become full qualified for the largest HGVs (Class C+E). Consequently, the cost of training courses are now out of financial reach of many potential drivers.
- 3.29 The ability to recruit drivers from other EU countries, particularly from central and eastern Europe, had mitigated the declining inward supply of drivers from domestic sources.



 <sup>&</sup>lt;sup>3</sup> Class C – rigid goods vehicles over 7.5 tonnes gvw. Class C+E – goods vehicles over 7.5 tonnes gvw towing a trailer or semi-trailer i.e., rigid and draw-bar combination or articulated tractor and semi-trailer.
<sup>4</sup> Formerly the Freight Transport Association (FTA).

However, since the Brexit referendum in 2016, there has been a steady decline in the number of EU drivers employed in the UK logistics sector. This has been caused by many EU drivers already employed in the UK returning to their home country or another EU country, coupled with significantly less new inward migration. This process was subsequently accelerated by the Covid-19 pandemic. According to the afore-mentioned Logistics UK labour market survey, between Q2 2019 and Q2 2020, the numbers of EU drivers fell from 39,000 to 25,000 (decline of 36%). Allied to this, since 1 January 2021 the new post-Brexit work-visa system now effectively bars operators from recruiting new drivers from the EU. Under the new 'skilled workers' immigration work-visa system, HGV drivers are not be classified as 'skilled workers'.

- 3.30 To overcome this issue, the Government announced in late September 2021 that they were subsequently making available up to 5,000 temporary work visas for EU drivers, valid for up to 3 months. In addition, the UK Government also announced in mid-October 2021 that cabotage<sup>5</sup> rules were also being revised for a temporary six month period to allow unlimited collections/deliveries within a two week period before for EU-based HGVs would have to return to the EU (the *EU-UK Trade and Co-operation* agreement allows for two cabotage operations with a seven day period). However, both are viewed as temporary solutions while initiatives to boost domestic recruitment are implemented.
- 3.31 The industry has clearly struggled to recruit domestically, including the replacement of departing EU drivers due to Brexit (a key cause of the skills shortage and supply chain problems described). One explanatory factor, amongst others, is that it is viewed has having poor working conditions; it is not considered to be a desirable occupation for school/college leavers. Working hours are long and shift patterns unsociable and irregular when compared with other comparable jobs at similar pay grades (i.e.,, not compatible with a family work-life balance). Logistics UK's labour market survey notes that only 0.9% of HGV drivers are currently under 24 years old.
- 3.32 While some factors relating to working conditions are under the control of the logistics industry (e.g.,, shift-patterns), one important reason working conditions are considered poor (thereby affecting recruitment into the sector) is the fact that when drivers are away from their home depots, they often have difficulty gaining access to basic amenities (as alluded to above) that workers in most sectors take for granted. If recruitment into the industry is to be increased, then HGV driving will have to be promoted as an attractive career option with a safe and healthy working environment. This means that when drivers are away from their home depots, they have the ability to take break periods away from their work position (i.e.,, the driving cab), purchase food and drink refreshments and visit the toilet at all times at the very least.



<sup>&</sup>lt;sup>5</sup> Cabotage – the ability for EU-based haulage operators to undertake domestic collections/deliveries in the UK and vice versa

- 3.33 For overnight rest periods, while modern HGV cabs have heated bunks for sleeping, drivers should have the ability to access showers and breakfast. The unavailability of such facilities is hardly likely to attract potential employees (particularly women) into the sector. The provision of high quality HGV parking facilities with the required amenities, as proposed by this application, will therefore have an important role to play in the promotion of the road haulage sector itself and address the immediate skill shortage issue facing the industry (aid the recruitment/retention of new qualified HGV drivers).
- 3.34 Undoubtably, road haulage operators will have to expand their in-house training offer, and a number of leading hauliers are now introducing schemes to train existing employees as HGV drivers (after an appropriate qualifying time in other roles). Higher wages, more regular shiftpatterns and better working conditions overall will have to form part of a long-term recruitment and retention strategy. However, the provision of new lorry parking facilities will also need to form an important component of that strategy.

#### **A5 Growth Corridor**

- 3.35 The A5 is the historic road connecting London with Holyhead (Ireland). While this role is now largely undertaken by the M1/M40, M6 and M56/A55 corridors, various sections of the A5 continue to play an important strategic role within the wider road network, particularly for the freight and logistics sectors. The section of the A5 extending from Northamptonshire to Staffordshire via Hinckley and Tamworth is one of those important strategic routes and it has been identified as a 'growth corridor'. Notable freight generating locations accessed from the A5 include:
  - DIRFT SRFI;
  - Magna Park Lutterworth;
  - Birch Coppice Business Park
  - Core 42 Business Park Tamworth;
  - St Modwens Park Tamworth;
  - Centurion Park Tamworth
  - Relay Park Tamworth;
  - Holly Lane Industrial Estate, Aldi UK HQ and TNT UK HQ, Atherstone
  - CONNEQT / Kingswood Lakeside Cannock;
  - M6DC; and
  - Hinckley Park.
- 3.36 West Midlands Interchange, a Strategic Rail Freight Interchange (SRFI) recently granted planning consent, will connect with the A5. The proposed Hinckley SRFI is currently passing through the Development Consent Order process; given consent this rail-served scheme will



also be served from the A5. Given this position, the corridor extending from Northamptonshire to Staffordshire via Hinckley/Tamworth has been identified as a 'growth corridor', and the A5 Transport Partnership was formed in 2010 in order to develop and implement a long-term strategy for the route. The partnership consists of National Highways (formerly the Highways England), Midlands Connect and the various local highway authorities, district councils and Local Enterprise Partnerships (LEPs) along the corridor, and private sector parties such as Birmingham Airport and M6 Toll. The aim of the strategy is to help deliver economic growth while at the same time providing a safer and more sustainable transport network, particularly managing the impact of freight.

- 3.37 The first long-term strategy was developed in 2011 and addressed the period 2011 to 2026 (Appendix 4). It included a list of proposals, an action plan and a system for monitoring delivery. An update/re-fresh was published in 2016 (Appendix 5). A revised strategy was published in 2018 covering the period 2018 to 2031 (Appendix 6). This strategy notes the increased importance of the A5 as a strategic route, along with unprecedented levels of housing and employment growth that is likely to come forward up to 2031. The 2018 strategy set out five key themes:
  - Delivering growth;
  - Supporting network resilience;
  - Delivering a safe and secure A5;
  - Managing the impact of freight; and
  - Delivering a sustainable A5
- 3.38 The strategy notes that employment development along the corridor is contributing to the need for lorry parking facilities and is putting pressure on the existing limited lorry parking facilities along the corridor (Para 8e.10). With that in mind, the strategy document states that National Highways and the local highway authorities recognise that lorry parking needs to be addressed strategically in order to support the growth of employment sites along the corridor, whilst ensuring that the routes operates to its full potential (para 8e.12). In conclusion, *Policy MF2* of the strategy states that "The A5 Partnership will continue to work with partners to seek to identify and secure suitable, attractive and manageable sites for long and short stay HGV parking" (Page 62).
- 3.39 It is apparent that the proposed lorry parking facilities being promoted by HE strongly conforms with the five themes set out in the A5 Transport Partnership strategy. Further, the planned facilities will help address an identified need in the strategy and contribute to the delivery of one of its key policies (MF2). It should also be noted that the proposed facilities will be able to address freight traffic passing east-west along the A5 corridor in addition to that passing north-south along the M42 corridor.



#### **Letters of Support**

- 3.40 The Road Haulage Association (RHA) submitted representations to the North Warwickshire local plan examination in December 2018 concerning lorry parking issues in general and the future of Tamworth MSA in particular. The letter is presented in *Appendix 2* of this report.
- 3.41 The letter notes the plans of HS2 and the proposed demolition (at the time) of the MSA to facilitate the new high-speed railway. It also notes that the current Tamworth MSA is located on a high volume traffic route and that it currently plays an important role in providing parking facilities for HGV drivers. The outputs from the National Lorry Parking Survey are referenced in the letter alongside the National Planning Policy Framework (NPPF) policy requirement (both summarised below).
- 3.42 The letter notes the proposals of HE for its lorry park adjacent to the M42 Junction 10 (the subject of this application). Having studied the plans, the letter concludes that the RHA is in a position to support the proposals, in particular identifying the following as justification:
  - An acute shortage of lorry parking capacity in the Tamworth area;
  - It would provide a safe and secure location for HGV drivers parking overnight; and
  - It will provide appropriate amenity facilities required by HGV drivers.

#### **Summary and Conclusion**

- 3.43 Overall, the qualitative need assessment conducted above clearly indicates:
  - A need for lorry drivers to park while taking statutory break periods and while waiting for delivery time slots at distribution centres and other locations;
  - A need for lorry drivers to park overnight while undertaking statutory rest periods;
  - Drivers should have access to basic amenity facilities, such as toilets and food/drink refreshments;
  - A deficit of suitable purposely designed off-road lorry parking capacity in a particular area effectively forces HGVs to park inappropriately on the public highway or at other unsuitable locations;
  - Support from the road haulage industry for expanded parking facilities; and
  - The expected growth in logistics facilities along the 'A5 Growth Corridor'.
- 3.44 It is also worth re-iterating the need to expand the level and quality of HGV parking provision as a means of addressing the current skills gap in the sector (HGV driver shortages). Better working conditions overall will have to form part of a long-term recruitment and retention



strategy and the provision of new lorry parking facilities will form an important component of that strategy. Likewise, the provision of new lorry parks will play an important role in preventing crimes committed against HGVs and their drivers.



## 4. NEW HGV PARKING FACILITIES – POLICY SUPPORT

- 4.1 This Section sets out current planning policy and Government support for the development of new HGV parking facilities. It also reviews the most recent national surveys of HGV parking facilities undertaken for the Department for Transport (DfT) and National Highways.
- 4.2 Planning consultants *WSP* have been retained by the applicant to advise on planning matters, and reference should be made to the submitted Planning Statement concerning the overarching planning case for the application as a whole. While the following planning policy documents are cited by WSP, as they relate directly to the HGV parking facility need case, they have also been referenced below.

#### National Planning Policy Framework (2021)

- 4.3 National planning policy for England is currently set out in the National Planning Policy Framework (NPPF). This was originally published by the *Department for Communities and Local Government (DCLG)* in March 2012, and then subsequently revised and reissued in February 2019 and *July 2021* by the re-titled *Ministry of Housing, Communities and Local Government (MHCLG).* The NPPF is a material consideration in planning decisions (Para 2).
- 4.4 <u>Paragraph 109</u> of the NPPF is material with respect to the proposed HGV parking facility, and it is therefore referenced in this document too. It states that:

"Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.."

4.5 This paragraph is fairly self-explanatory. It notes that the provision of parking facilities is important, particularly in areas where there is currently a shortage of capacity, to reduce the negative impacts of inappropriate parking (as described in the previous Section). It also expects new large-scale warehousing schemes to provide an appropriate level of parking for visiting HGVs. Overall, the NPPF demonstrates clear policy support for the development of additional HGV parking capacity as integral components of new distribution centre schemes.



#### North Warwickshire Local Plan (2021)

4.6 The North Warwickshire Local Plan was adopted in September 2021; it sets out the planning polices to guide the development of land within North Warwickshire. <u>Policy LP34</u> sets out the planning authority's position on parking provision for road going vehicles. With respect to lorry parking, the relevant paragraph of Policy LP34 states:

"Proposals which reduce lorry parking (either informal or formal parking areas) should be accompanied by evidence to support its loss and explore opportunities for alternative provision. In recognition of the Borough's strategic location and demand for lorry parking, the Council will give weight to lorry parking provision and facilities, and opportunities for alternative provision and for improved management in decision-taking."

4.7 This paragraph is again fairly self-explanatory, noting North Warwickshire's strategic location, that there is demand for HGV parking facilities in the area and that support will be provided for appropriate provision and facilities.

#### National Survey of Lorry Parking (2017)

- 4.8 In 2017, the DfT commissioned consultants AECOM to undertake research on lorry parking demand in England. The purpose of the commission was to provide a clear picture of the demand for lorry parking, including the capacity and utilisation of existing officially recognised lorry parks, as well as other indicators of demand such as HGV parking in lay-bys and on industrial/retail estates. A copy of the National Lorry Parking Survey report is presented at *Appendix 3* of this document.
- 4.9 Initially, the DfT's in-house database of existing lorry parks was reviewed and updated as a desk-top exercise. National Highways records plus information contained on a selection of 'truckers' websites were used as the primary sources of data; new HGV parks and updated information on existing ones were subsequently added to the database. Lay-bys and industrial estates within 5km of the strategic road network were also identified as part of this desk-top exercise (most of which will not have any toilets and food/drink refreshment facilities available nearby).
- 4.10 Working on a regional basis, site surveys were then undertaken to confirm or otherwise the information contained on the DfT's database e.g.,, parking capacity, cost, facilities available, etc. Dedicated and official overnight lorry parks (e.g.,, MSAs) were subsequently classified as 'on-site' parking. On a similar basis, the site surveys also gathered information on the identified industrial estates and lay-bys that are used as parking locations, which were subsequently classified as 'off-site' parking. As these have not been purposely designed to



accommodate overnight parking and the majority lack any toilet and food/drink refreshment facilities, they were considered unsuitable or inappropriate parking locations.

- 4.11 During March 2017 (on Tuesday, Wednesday and Thursday evenings), utilisation surveys were then undertaken at each of the identified 'on-site' and inappropriate 'off-site' parking locations. Any surplus or deficit of parking capacity was subsequently established, including the level of parking at unsuitable/inappropriate 'off-site' locations. In total, 311 'on-site' parking facilities were visited alongside 4,198 'off-site' locations.
- 4.12 On a national basis, the utilisation surveys reported that official 'on-site' parking facilities had a total capacity of 15,021 HGV spaces and that on average 76% of the spaces were occupied on a nightly basis. When the recorded utilisation rate is between 70% and 84%, the survey classifies this as 'serious', and is the point where drivers have to search for spaces (Page 52, National Lorry Parking Survey report). The utilisation surveys also concluded that 39% of HGVs were parked overnight at 'off-site' parking locations i.e.,, lay-bys and industrial estates.

#### West Midlands Region – Identified Deficit

4.13 For the West Midlands region, the utilisation surveys reported that official 'on-site' parking facilities had a total capacity of 1,906 HGV spaces and that on average 1,663 spaces (87%) were occupied on a nightly basis. The survey report classifies a utilisation rate greater than 85% as 'critical', this being the rate where it is *"very difficult for additional drivers to find parking spaces depending on the size of vehicles and the way they are positioned"*. In practice, the survey concludes that a lorry park with a utilisation rate 85% or above can be considered full (Page 52, National Lorry Parking Survey report). Map 4.1 below, taken from the National Lorry Parking Survey report, shows that overall the West Midlands region has a 'critical' rating with respect to utilisation.



#### Map 4.1: Utilisation by Region (Source: National Lorry Parking Survey, DfT 2017)

4.14 The table below, again taken directly from the DfT/AECOM report, shows the 16 'on-site' parking facilities in the West Midlands which have a 'critical' utilisation rating. A rate higher than 100% indicates parking outside of designated areas or spaces, including on grass verges and entry/exit slip roads.

#### Table 3.1: On-site Lorry Parks in West Midlands with 'Critical' Rating

West Midlands Sites with Critical Utilisation (>85%)	Utilisation
West Midlands	87%
Welcome Break Keele Services Northbound	221%
Welcome Break Telford Services	158%
Welcome Break Warwick Services Northbound	142%
Welcome Break Corley Services Westbound	119%
Welcome Break Warwick Services Southbound	115%
Welcome Break Keele services southbound	107%
Dorton service station	100%
Pitstop Truckstop Bromsgrove	100%
PJs Café and Sudbury Services	100%
Truckers Rest	97%
New Hollies Truckstop	94%
Roadchef Strensham services north	93%
Moto Tamworth	92%
Uttoxeter Services	91%
Stafford Services Southbound	90%
PJM Lorry Park	88%

Source: National Survey of Lorry Parking (Table 5.47)



- 4.15 It is important to note that Tamworth MSA is operating at 92% capacity each night i.e.,, above the critical 85% utilisation rate, as described. This is currently the only formal HGV parking facility in the immediate vicinity of the M42 Junction 10.
- 4.16 Considering all overnight parking in the West Midlands region, the utilisation surveys reported that an average of 2,519 HGVs were parked each night (1,663 at 'on-site' facilities and 856 at inappropriate 'off-site' locations in lay-bys and industrial estates). When compared with the total capacity at official 'on-site' parking facilities, this represents a daily excess demand over capacity of 613 HGVs (or daily demand being *132% of the installed 'on-site' capacity*).
- 4.17 The National Lorry Parking Survey report concludes by noting that high levels of 'off-site parking' were recorded along the M6 and A5 corridors. Further, during a study consultation exercise with a variety of stakeholders (including the FTA, RHA, Highways England and Trade Unions), the Hams Hall to Dordon corridor was specifically noted by consultees as having a particular shortage of HGV parking capacity (Page 39, National Lorry Parking Survey report). This is illustrated on Figure 4.1 on Page 40 of the National Lorry Parking Survey report, which is reproduced below.



#### Map 4.2: National Parking Shortage 'Hotspots'

Source: Figure 4.2 from National Lorry Parking Survey report

4.18 It is clear from the results of the National Survey of Lorry Parking that there was a significant deficit of 'on-site' HGV parking capacity in the West Midlands region in 2017, which is only likely to be exacerbated today. On-site parking is effectively shown to be operating at capacity each night, and overall, around 34% of HGVs parking overnight in the region are shown to be doing so at unsuitable/inappropriate 'off-site' locations. These sites are unlikely to be



providing basic amenities, including toilets and washing facilities and food/drink refreshments, which in turn leads to issues with crime and antisocial behaviour.

- 4.19 Demand for overnight HGV parking is identified as being around 132% of the installed capacity and Tamworth MSA is noted as operating at 92% capacity each night, above the critical 85% utilisation rate (at the time of the surveys in 2017). A particular issue has been identified for the M42 / A5 corridor and between Hams Hall and Birch Coppice Business Park, Dordon.
- 4.20 To supplement and confirm this identified regional deficit, a specific 'parking beat' survey has been undertaken within a 5km radius of the proposed Junction 10 facility. This is reported on in Section 6 below and similarly concludes that there is a significant level of overnight parking presently taking place at inappropriate off-site locations.
- 4.21 An overall need for additional overnight HGV parking capacity in the West Midlands region and specifically at Junction 10 of the M42 has therefore been clearly identified. By extension, the outputs from the National Survey of Lorry Parking provide clear support for the development of the new HGV parking facility at Junction 10. It should also be noted that similar conclusions are reached for the neighbouring East Midlands region.

#### Written Statement to Parliament (May 2018)

- 4.22 On 21 May 2018, then Transport Minister Jesse Norman MP published a written statement to Parliament covering both Operation Stack (the parking of HGVs on the M20 when there are issues at the Port of Dover and Channel Tunnel) and HGV parking at inappropriate locations. A copy of the written statement is presented at *Appendix 4* of this report.
- 4.23 The statement indicates that the Government is "focused on improving the situation for business-as-usual lorry parking", alongside noting the publication of the National Survey of Lorry Parking (reviewed above). It states that the report will help local planning authorities better understand the issue of HGV parking at both the local and regional level. It also notes that developers are responding to what is currently a mismatch between supply and demand, with planning applications in the pipeline estimated to deliver over 1,000 additional spaces across England.
- 4.24 Given the evident need for the development of further HGV parking capacity, the statement notes that the Government will be taking three steps to support this, namely:
  - National Highways will examine options within its landholdings that could potentially facilitate the delivery of an additional 1,500 HGV parking spaces. National Highways also intend in future to give increased priority to the provision of lorry parking across the strategic road network;



- The DfT and the MHCLG will be writing to planning authorities to draw their attention to the survey results, which show a strategic national need for more lorry parking and highlight shortages in specific areas. The DfT will also direct National Highways to work with local planning authorities to identify potential solutions, including through planning applications where these deliver additional parking capacity; and
- The DfT will consider further steps to make it easier for local authorities to take enforcement action against hauliers who park inappropriately.
- 4.25 Overall, the Ministerial statement provides clear support for the provision of new HGV parking facilities, such as that planned at Junction 10 of the M42, in that:
  - It references the National Survey of Lorry Parking and the strategic national need for additional capacity presented in it;
  - That the delivery of new HGV parking capacity across the strategic road network is a National Highways priority (the planned facility is served directly from the strategic road network); and
  - That the provision of additional HGV parking capacity will, in part, be delivered through developer lead schemes (the planned facility will be part of a wider commercial property development).

## Letter from MHCLG and DfT to Chief Planning Officers (May 2018)

- 4.26 In May 2018, the DfT and MHCLG wrote to Chief Planning Officers in local planning authorities across England to draw attention to the issue of the shortage of HGV parking capacity. A copy of the letter is presented at *Appendix 5* of this report.
- 4.27 In summary, the letter noted:
  - The National Survey of Lorry Parking and the strategic national need for additional capacity presented in it;
  - The road haulage sector is dependent on sufficient facilities for drivers being available and in the right locations, to enable drivers to take their regular statutory breaks;
  - The NPPF (reviewed above), which includes policies to support a vibrant economy, promote sustainable transport and facilitate the provision of transport infrastructure; and
  - Problems associated with HGV parking in the vicinity of modern distribution centres (due to time limited slots), and the need for the developers of new warehousing facilities to take account of parking needs to avoid displacement parking in surrounding areas.
- 4.28 The addition of new HGV parking capacity as part of wider industrial warehouse development, such as that planned, clearly conforms with the contents of the letter.

#### Lorry Parking Demand Assessment (2019)

- 4.29 In 2019, National Highways (then Highways England) commissioned AECOM to undertake a further study into lorry parking demand (the Lorry Parking Demand Assessment) attached *Appendix 6*. The purpose of the study was to identify those areas which experience high demand for HGV parking but where there is currently a lack of suitable provision. The study used both quantitative and qualitative analysis of driver patterns of behaviour on key freight corridors to narrow down the most likely areas of demand for lorry parking. Consideration was also given to locations most likely to make successful lorry parks.
- 4.30 The study consisted of three stages, namely:
  - A more detailed assessment of supply and demand, derived from data gathered for the *National Survey of Lorry Parking* (2017, as described above);
  - A stakeholder-led demand analysis, including consultation with hauliers, trade bodies, parking facility providers and public bodies (including Highways England Traffic Officers); and
  - Port driven demand data.
- 4.31 The review of the National Survey of Lorry Parking data was undertaken with the intention of providing information on local areas with high demand for parking and a low supply of suitable facilities. Noting that the National Survey report classifies lorry park utilisation rates greater than 85% as 'critical' (i.e.,, effectively full), all recognised 'on-site' lorry parks with a value over 85% utilisation were identified. For the West Midlands, 16 out of 38 or just over 42% of 'on-site' lorry parks are considered 'critical' (the equivalent figure for the East Midlands was 18 out of 49 lorry parks or just under 37%). The map below, taken from Figure 2.2 in the Demand Assessment report clearly shows that all recognised lorry parks in the Tamworth/A5 corridor area are at the 'critical' rating.





4.32 With regards to HGV parking at inappropriate locations, the Demand Assessment report notes that 52% of lay-bys in the West Midlands are occupied by at least one HGV on a nightly basis (65% in the East Midlands). The map below, taken from Figure 2.3 in the Demand Assessment report, shows lay-by usage across the Midlands. It shows that there are a significant number of lay-bys in the Tamworth/A5 corridor area that are occupied by multiple HGVs on a nightly basis.





- 4.33 The Demand Assessment also considered inappropriate HGV parking at locations within industrial estates. It notes that 14 out of the 86 or just over 16% of industrial estates identified in the West Midlands had at least 10 HGVs parking overnight (17 out of 115 or just under 15% of industrial estates in the East Midlands had at least 10 HGVs parking overnight).
- 4.34 The map below, taken from Figure 2.4 in the Demand Assessment report, shows the extent of overnight parking at industrial estates across the Midlands. Similar to the lay-by parking data, it shows that there are a significant number of HGVs parking overnight at industrial estates in the Tamworth/A5 corridor area.





Map 4.5: Overnight Parking at Industrial Estates

- 4.35 By combining the data covering parking at inappropriate 'off-site' locations (lay-bys and industrial estates) with that for the recognised 'on-site' lorry parks that have a 'critical' rating, the Demand Assessment report developed a series of 'heat maps' which allows the identification of local parking 'hot spots' i.e.,, those areas where demand for HGV parking is high but the provision of purpose-built lorry parking capacity is low.
- 4.36 The East and West Midlands Logistics Hub is subsequently identified as one of these 'hot spots. The map below, taken from Figure 2.6 in the Demand Assessment report, shows the East and West Midlands Logistics Hub heat map. It clearly shows the Tamworth/A5 corridor as being in an area of high demand but served by recognised lorry parking capacity operating at the critical rating.





Map 4.6: East and West Midlands Logistics Hub 'Hot Spot'

Source: Lorry Parking Demand Assessment, Figure 2.6 (HE, 2019)

- 4.37 The Demand Assessment essentially confirms for the Tamworth/A5 corridor area the same conclusions reached in the National Survey of Lorry Parking for the West and East Midlands regions as a whole, namely that:
  - Demand for lorry parking is high;
  - Official 'on-site' lorry parking facilities are operating at critical levels i.e.,, at or beyond current design capacity; and
  - There is a significant level of overnight parking at inappropriate 'off-site' locations in laybys and industrial estates.
- 4.38 These conclusions are further re-enforced by the specific demand assessments undertaken and reported in *Section 6* below.
- 4.39 The Demand Assessment also examined the quality of lorry parking facilities. Using a consistent criteria based approach, each on-site parking facility was ranked into one of three categories, namely High Quality, Middle of the Range and Cheap and Cheerful. The map below, taken from Figure 2.14 in the Demand Assessment report, shows that the Tamworth/A5 corridor area consists of on-site parking in the Cheap and Cheerful category.





Map 4.7: On-Site Lorry Parking Facilities by Quality Ranking

4.40 This application, in addition to providing much needed parking capacity to address the identified high demand, will also provide lorry drivers with a choice of higher quality facilities when compared with those currently provided. This clearly feeds into the need to provide the lorry driver workforce with a better standard of working conditions (to address the skills gap described above).

#### Letter to UK Logistic Sector from DfT, DWP and DEFRA (2021)

- 4.41 In July 2021, the Secretaries of State at the Department for Transport, Department of Work and Pensions and Department of the Environment, Food and Rural Affairs wrote a joint open letter to the UK logistics sector. A copy of the letter is presented in *Appendix 7*.
- 4.42 The letter commences by offering thanks for the hard work undertaken during the Covid-19 pandemic by the sector in keeping goods moving. The main thrust of the letter concerns the 'well documented' shortage of qualified HGV drivers and the package of measures the Government is proposing or undertaking to support driver recruitment and retention in the industry. It notes the planned increase in driver testing capacity, proposed changes to the testing regime that could speed up HGV driver training/testing and further support for training through the apprenticeship programme.



#### 4.43 With respect to HGV parking, the letter states:

"While we focus on increasing the supply of drivers into the industry, any success in this area will need to be supplemented by action to improve retention of drivers. <u>Here we seek to</u> <u>support industry-led action</u> [underlining our emphasis]. We will reinvigorate work on lorry parking with trade and driver representatives with a view to working with businesses, Highways England and via planning to improve the quantity and quality of overnight facilities and access to facilities during the day."

4.44 Better working conditions and welfare of drivers is a key component in improving the retention of new drivers once qualified (as described *Section 3* above). It is apparent from the letter that the Government views expanded HGV parking capacity overall and higher quality of overnight facilities as an integral part of this process, and that the solution will be industry-led action, such as the proposals being brought forward at M42 Junction 10.

#### Letter from DfT to HGV Licence Holders (2021)

- 4.45 This letter was sent on 25 September 2021 by the *Minister for Roads, Baroness Vere*, to all holders of HGV driving licences. In particular, the letter was aimed at those who hold HGV driving licences but are not currently employed in the sector. It asked them to consider returning to work in the logistics sector, noting the many and varied driving opportunities now available.
- 4.46 While the letter does not specifically refer to the provision of lorry parks, it does further emphasise the position outlined in *Section 3* above concerning the current significant shortage of qualified HGV drivers. The letter mentions the national shortage and the pressure this is placing on supply chains. A copy of the letter is provided at *Appendix 8*.

#### Statement from DfT (2021)

- 4.47 Published at the same time as the afore-mentioned letter to HGV licence holders, this statement from the DfT outlines the package of measures the Government is proposing or undertaking to support the accelerated training of new HGV drivers into the logistics industry. These include plans for intensive training courses (so called 'boot camps'), funding through the adult education budget and the supply of additional driver testers (some from the Ministry of Defence) to speed up the testing process once drivers have been trained.
- 4.48 Again, while the letter does not specifically refer to the provision of lorry parks, it does further reinforce the position outlined in Section 3 of this report concerning the current significant shortage of qualified HGV drivers. A copy of the statement is provided at *Appendix 9*.



#### Welcome Break Corley Services – Planning Appeal

- 4.49 A recent appeal decision (ref. APP/R3705/W/17/3192501) relating to proposals for additional HGV parking incorporating associated infrastructure and works at the existing Welcome Break MSA at Corley provides further relevant background to the existing availability of HGV parking facilities in North Warwickshire, as well as a local decision precedent. The appeal decision is attached at *Appendix 10*.
- 4.50 There, planning permission was originally refused by NWBC (ref. PAP/2017/0104) on the basis the proposals would constitute 'inappropriate development', would cause significant harm to Green Belt openness and would not amount to the very special circumstances necessary to clearly outweigh the harm caused decision notice attached at *Appendix 11*.
- 4.51 In overturning the decision, the Planning Inspector agreed with the council that development would constitute inappropriate development but nevertheless held that the proposals should be approved as, inter alia, the *"overall growth in HGV traffic nationally and regionally, allied with the need to accommodate this"* (paragraph 13 of the appeal decision), to which he attached 'moderate weight', meant *"that very special circumstances exist which justify the development"* (paragraph 33 of the appeal decision).
- 4.52 The Inspector also attached "considerable weight" to Paragraph 107 of the NPPF, which confirms planning decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance (as set out above).
- 4.53 The appeal precedent is clear, where a local shortage of adequate overnight lorry parking is identified, as is demonstrably the case at Junction 10 of the M42 as set out in this report, "considerable weight" should be given to proposals that seek to address this inadequate provision.
- 4.54 It is also noted in the appeal decision *"that the Council is commissioning a Borough wide survey in relation to HGV parking."* It is informative that no such survey has been published to date, over three years later.



- 5.1 The analysis presented in the previous two Sections has highlighted the following key issues:
  - A need for drivers to undertake statutory break periods and/or wait before deliveries (short-term need, up to 1-2 hours);
  - A need for drivers to undertake daily rest periods, predominantly overnight (long-term, average 9-11 hours);
  - The environmental consequences of parking HGVs inappropriately on the public highway or at other unsuitable locations;
  - While *daily rest* periods are predominantly taken over-night, statutory driving *breaks* and *waiting for delivery time slots* take place across the 24 hour period. It is therefore vital that suitable sites are located where access is available 24 hours a day;
  - HGV parking facilities should be located a short distance from access/egress points on the strategic highway network in order to minimise diversion (for break/rest periods) and be near the ultimate destination (waiting for time slots);
  - Government recognition (supported by evidence from the National Survey of Lorry Parking and the Demand Assessment) that there is currently a significant deficit of HGV parking capacity, particularly in the West Midlands region and the Tamworth/A5 corridor area;
  - Lorry crime the need to provide safe secure parking in order to deter criminals and provide a safe working environment for drivers;
  - The significant shortage of qualified HGV drivers; and
  - Drivers, as with all employees, are entitled to a healthy working environment. As a minimum, drivers should have the ability to take break periods away from their work location (i.e., the driving cab), purchase food and drink refreshments and visit the toilet at all times. For overnight rest period, drivers should have access to shower and breakfast facilities. An expanded range of high quality parking facilities will deliver this requirement. This is also important when considering the need to recruit new employees into the sector, particularly women.
- 5.2 Drawing together the above, this clearly implies a requirement to provide additional HGV parking capacity connected to but located off the public highway, where HGVs can be parked in an appropriate manner. These facilities should be divided into two categories based on which parking needs they are seeking to address.
- 5.3 *Short-term* parking facilities are for drivers seeking somewhere to park while awaiting distribution centre timeslots or undertaking statutory breaks up to 1 hour in length. It is self-evident from the analysis above that, as a <u>minimum requirement</u>, short-term parking should be provided with:

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- Toilet and light washing facilities;
- Perimeter fencing, CCTV and night-time lighting. This would offer the perception that it is a safe and secure place to park, particularly after dark (addressing the crime and safe working environment issue);
- Hot drink and light food refreshments available during the day-time (from early morning to early-evening). This could be a fixed establishment (e.g., a café) or via some form of mobile retail outlet such as a van or trailer (as used at events, festivals etc..). An area where food/drink can be consumed away from the vehicle should also be provided (this could be an outdoor area if provided from a mobile unit); and
- Parking for at least 10 HGVs. To address the security/crime issues identified, isolated facilities with only one or two HGVs parking should be avoided (safety in numbers concept).
- 5.4 Provision of hot drinks and light snacks over the 24-hour period, hot food/meals and wi-fi internet access would be 'nice to have' additions. *DfT Circular 02/2013* requires that such facilities signed from the strategic road network have to offer free parking (up to 2 hours) and access to toilet facilities without needing to make a purchase at any food/drink outlets.
- 5.5 *Short and long-term* parking facilities would also be aimed at drivers seeking somewhere to park while awaiting timeslots or undertaking statutory breaks. However, they would also simultaneously accommodate drivers seeking parking for daily rest periods (up to 12 hours), which will predominantly be overnight. Again, it is self-evident from the analysis above that, as a <u>minimum requirement</u>, short and long-term parking should be provided with:
  - Toilet and shower facilities many drivers will be parking overnight;
  - In addition to fencing, CCTV and lighting security measures outlined, entry should be via a controlled barrier (either to the whole site, though as a minimum requirement, to the area within the site that accommodates overnight parking);
  - Facilities serving a hot evening meal and breakfasts (either on-site or within a short walk) in addition to hot drinks and light refreshments. Again, an area where food/drink can be consumed away from the vehicle should also be provided; and
  - Parking for at least 50 HGVs.
- 5.6 Such facilities would come under the *'High Quality'* ranking as defined in the Lorry Parking Demand Assessment (see Section 4).
- 5.7 In terms of their layout and configuration, ideally short-term parking during the night time would be separated from those HGVs which parked over-night (to minimise disturbance). The provision of some form of 'entertainment' (bar, televisions etc..), wi-fi and fuel sales could be considered optional additions.



5.8 Both types of facility should have facilities where drivers can dispose of waste (recyclable materials and 'black bag' waste). The table below summarises the key facility requirements for both parking types.

Table 5.	1: Types	of HGV	Parking	Facility
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Parking Type	Minimum Requirements	Optional
Short-term	Free parking up to 2 hours	Hot drink and light food
	Perimeter fencing, CCTV recording and night-time lighting	refreshments (24-hour)
	10 x 18.5m parking spaces	Hot food/meals
	Toilets and light washing facilities	Wi-fi
	area	
	24 hour access	
	Waste and recycling facilities	
Short and long-	Free parking up to 2 hours	Bar, TV, entertainment
term	Perimeter fencing, barrier controlled entry, CCTV recording and	etc
	night-time lighting	Fuel sales
	50 x 18.5m parking spaces	Wi-fi
	Toilets and showers	
	Hot evening meal/breakfast facilities (either on-site or within a	
	short walking distance), hot drink and light food refreshments	
	with eating area	
	24 hour access	
	Waste and recycling facilities	

5.9 As noted, the level of amenities which should be provided at each type of site is self-evident based on the analysis presented. However, by way of examples the table below illustrates the facilities provided at a selection of existing dedicated overnight truckstops (excluding MSAs).

#### Table 5.2: Non MSA HGV Parking Sites in Central and Northern England

Truck Stop and Location	Number Parking Spaces	Main Facilities	Overnight Parking Fee
Exelby Leeming Bar	85	Security, café, toilets, showers, shop and fuel	£17 with meal voucher
Lymm Truck Stop	300	Security, café, toilets, showers, shop and fuel	£17.00
Heywood Distribution Park	200	Security, café, toilets, showers, shop and fuel	£7.50

Ellesmere Port	48	Security, café, toilets, showers, shop	£15 with meal
		and fuel	voucher
Carnforth	360	Security, café, toilets, showers, shop,	£8.00
		TV room and fuel	
Golden Fleece (J42 M6)	50	Security, café, toilets, showers, shop	£8.00
		and fuel	
Penrith	160	Security, café, toilets, showers, shop	£14.00
		and fuel	
Cleveland Truck Stop	250	Security, café, toilets, showers, shop	£12.00
		and fuel	
A19	20	Security, café, toilets, showers, shop	£8.00
		and fuel	
Rugby	240	Security, café, toilets, showers, shop,	£18.50
		TV room and fuel	
M1 J23 Lorry Park	180	Security, café, toilets, showers, shop,	£14.00
		TV room and fuel	
Lincoln Farm, Hampton in	200	Security, café, toilets, showers, shop,	£14.00
Arden (A452)		TV room and fuel	
Salt Box Café, Hatton,	35	Security, café, toilets and showers	£10.00
Derbyshire (A50)			
Birmingham Truck Stop	100	Security, café, toilets, showers, shop,	£7.50
(A45)		TV room and fuel	
Truckers Rest, Cannock (M6	90	Security, café, toilets, showers, shop	£10.00
Toll)		and TV room	
Hawkins Transport Village,	50	Security, café, toilets and showers	£10.00
Dudley (A449)			
Standeford Farm Café,	60	Security, café, toilets, showers and	£12.50
Featherstone (M54 and M6)		shop	
Crewe Lorry Park (M6)	120	Security, café, toilets and showers	£12.50

Source: Highways England Truckstops Guide


# 6. QUANTITATIVE NEED FOR THE HGV PARKING FACILITY

- 6.1 The DfT's National Survey of Lorry Parking and Highways England's Demand Assessment (reported in *Section 4*) identified a significant deficit of HGV parking capacity in the West Midlands region and in the Tamworth/A5 corridor area, following survey work carried out in 2017. According to this work, existing sites are effectively operating at capacity each night and around 34% of HGVs parking overnight in the region are doing so at inappropriate 'off-site' locations.
- 6.2 Demand for overnight HGV parking is identified as being around 132% of the installed capacity and Tamworth MSA (the only 'on-site' HGV parking area within the immediate vicinity of Junction 10) is operating at 92% capacity each night, above the critical 85% utilisation rate. In reality, the shortage of suitable 'on site' parking today is likely to be more acute due to the increase in freight traffic in the intervening years (as noted below) and the development of warehouse floorspace close to M42 Junction 10.
- 6.3 A particular issue has been identified for the A5 corridor and between Hams Hall and Dordon, and those facilities which do exist are recognised as being 'Cheap and Cheerful' on a quality ranking. The recognised shortage of qualified HGV drivers, partly caused by the lack of appropriate parking and welfare facilities away from depots, has also recently emerged as an important issue.
- 6.4 An overall need for additional HGV parking capacity (and associated driver welfare facilities) in the West Midlands region and in the Tamworth/A5 corridor area has therefore been clearly identified. With that conclusion in mind, the remainder of this technical report therefore addresses the following issues:
  - A quantitative assessment of demand or need specifically related to the proposed Junction 10 parking facility (the application site), which is addressed in this Section; and
  - The suitability or otherwise of specific sites as potential locations for delivering the required additional HGV parking capacity, including a focus on the plans being promoted by HE (the application) and others (*Section 7* below).

# **Assessment of Demand**

6.5 This Section of the report sets out likely demand for HGV parking facilities the immediate vicinity of the M42 Junction 10 specifically. Note that this assessment is a 'size the market' exercise (akin to a 'footfall' estimation) from which the planned parking facility will draw its throughput. It is not a forecast of the potential use on a daily basis of the planned parking facility that is being proposed; *Bancroft Consulting* have been commissioned by the applicant



to establish daily HGV trip rates for the development as whole (and associated junction capacity modelling etc..) and reference should be made to their technical reports.

- 6.6 In this respect, three assessments have been undertaken, namely:
  - An estimate of the number HGVs on a daily basis delivering to commercial properties in the immediate vicinity of the proposed HGV parking facility;
  - Estimating the minimum HGV parking capacity that should be provided in the immediate vicinity of M42 Junction 10, using the Department for Transport's own formula based method for sizing Motorway Service Areas and Truckstops (derived from the total number of HGVs passing on a daily basis, in this case on the M42 and A5); and
  - A 'parking beat' survey which has quantified overnight lorry parking at known inappropriate non truck-stop locations within a 5km radius of M42 Junction 10.

# Daily HGVs Delivering to Warehousing Floor Space

- 6.7 The immediate hinterland surrounding the planned HGV parking facility accommodates a number of large scale industrial and logistics buildings, commercial corridors and services. The major industrial areas, corridors and services within the immediate hinterland of Junction 10 are:
  - Carylon Road Industrial Estate, Atherstone;
  - Holly Land Industrial Estate, TNT UK HQ and Aldi UK HQ, Atherstone;
  - A5 Corridor Atherstone to Junction 10;
  - Core 42 Business Park, Dordon;
  - Birch Coppice Business Park, Dordon;
  - St Modwens Park Tamworth, Jct 10 M42;
  - Kingsbury Link Business Park and Oil Terminals (BP and Valero Energy), Kingsbury;
  - Centurion Park, Jct 10 M42;
  - Relay Park, Jct 10 M42;
  - Tamworth MSA
  - Old Watling Street corridor Jct 10 to Sutton Road though Wilnecote and Fazeley
  - Tame Valley Industrial Estate, Tamworth;
  - Riverside Industrial Estate, Fazeley, Tamworth;
  - Drayton Manor Business Park, Fazeley, Tamworth;
  - Ventura Park, Tamworth;
  - Lichfield Road Industrial Estate, Tamworth;
  - Kettlebrook Road Industrial Area, Tamworth; and
  - Amington Industrial Estate, Tamworth.



- 6.8 These sites include the Birch Coppice Logistics Park, Core 42 Business Park, Kingsbury Link, Centurion Park and Relay Park. Birmingham Intermodal Freight Terminal (BIFT) is also located at Birch Coppice. Maps of each site's location is provided in *Appendix 14*. This wider Tamworth area is therefore likely to attract significant numbers of inbound HGVs undertaking deliveries of cargo for storage and processing on a daily basis. These delivery trips will, in most cases, be undertaken by HGVs located outside the immediate area, and therefore operated by drivers that will potentially require parking facilities ahead of their allocated distribution centre delivery time slots as a minimum (short-term parking need, as described).
- 6.9 The number of HGVs on a daily basis delivering to commercial properties in the immediate vicinity of the proposed HGV parking facility has been estimated. In this case, the proposed parking facility's hinterland is taken to be a 5km radius<sup>6</sup> from the M42 Junction 10, and commercial properties receiving goods are considered to be warehousing units (distribution centres) or floor space in other commercial buildings but performing a storage function.
- 6.10 The estimation is derived from the total quantum of floor space within warehouse/distribution centre units or floor space within other commercial properties performing a storage function, sourced from *Valuation Office Agency (VOA)* records. The VOA records the amount of floor space by function within commercial properties across England and Wales for Business Rates purposes (non-domestic Rating List). The complete Rating List database is held in-house by MDS Transmodal; we have interrogated the raw dataset and extracted data relating to floor space within all commercial buildings with a designation 'warehouse' or a similar classification within 5km of the M42 Junction 10. For clarification, this includes:
  - Floor space designated as 'warehouse' or similar within a building whose primary classification is 'Warehouse and Premises' i.e., a building purposely built to receive, store and distribute cargo (i.e., the classic 'distribution centre'); and
  - Floor space designated as 'warehouse' or similar within a building that has some other primary classification. Note that these other commercial properties, such as those designated 'Factory and Premises' or 'Superstore and Premises', will also contain floor space used to store goods<sup>7</sup>.
- 6.11 Units with less than 500 square metres of 'warehouse' floor space (as defined) have been excluded from the analysis, so as to filter out those properties which are likely to receive infrequent deliveries or in smaller non-HGV sized freight vehicles. On this basis, from the VOA



<sup>&</sup>lt;sup>6</sup> To align with the National Lorry Parking Survey, which considered capacity within 5km of the strategic road network

<sup>&</sup>lt;sup>7</sup> Different floor space functions within individual commercial properties have differing rateable values. The VOA therefore records the primary floor space function alongside any ancillary floor space functions e.g., in a 'factory' or 'retail' property, 'warehouse' floor space is recorded separately.

Rating List a total of 561,093 square metres (approximately 6 million square feet) of warehouse floor space (as defined) across 91 properties is identified within 5km of M42 Junction 10. Note that there are also a number of major units and industrial areas just beyond this 5km radius.

6.12 Using various proxies which relate floor space to cargo throughput, this quantum of 'warehouse' floor space has been equated as daily inbound HGV deliveries. This is shown in the table below. On this basis, it is estimated that around *2,146 HGVs* on a daily basis are currently delivering to commercial properties within 5km of the M42 Junction 10.

#### Table 6.1: Warehousing and Estimated Daily HGV Deliveries

561,093	square metres	source: VOA (>500 sqm)
476,929	square metres occupied at anyone time	85% average floor space utilisation*
715,394	pallets in stock at anyone time	assuming 1.5 pallets per square metres of floor space
12,877,084	pallets handled per annum	assuming 18 stock turns per annum
643,854	HGV deliveries per annum	assuming average 20 pallets per HGV
2,146	HGV deliveries per day	assuming 300 days per annum

\* On average, 85% of the available floor space is occupied at anyone time

- 6.13 When considering the above number it is important to bear in mind the following:
  - Some HGVs will be performing multi-drop (milk-round) deliveries, meaning that a single HGV will potentially deliver to at least two properties in the 5km zone; and
  - HGVs based in the 5km zone will, after undertaking outbound deliveries, collect backloads from suppliers for delivery into the 5km zone.
- 6.14 These factors have not been accounted for, meaning that in practice the actual number of HGV trips will be slightly lower than that suggested in the table above. However, while this assessment was not intended to be a trip generation exercise (as noted), the figure does at least demonstrate that there is a significant level of inbound HGV activity into the area immediately surrounding the proposed HGV parking facility. We would expect a reasonable proportion of these trips to be attracted to and seek to use the capacity at the planned M42 Junction 10 HGV parking facility. It is also worth noting that recent forecasting work undertaken by MDS Transmodal on behalf of a group of Warwickshire local authorities using the GB Freight Model suggests that total road freight traffic into North Warwickshire, Nuneaton and Bedworth and Rugby districts combined will grow from 11.6 million tonnes in 2015 to 15.4 million tonnes by 2043. HGV activity in the immediate vicinity of Junction 10 is therefore forecast to increase steadily over the next 20 years.



## Parking Capacity at Junction 10 – Derived from HGVs Passing on M42 and A5

- 6.15 The level of throughput related to the other elements of parking need, namely *driving break* (short-term) and *overnight rest periods* (long-term), will be determined by 'passing trade' on the strategic road network rather than HGVs making specific trips into the M42 Junction 10 hinterland. The DfT's *Circular 02/2013 (Schedule 1)* provides guidance on the minimum number of HGV parking spaces that are expected at a Motorway Service Area (MSA) or Truckstop served from the strategic highway network, derived from the volume of passing traffic. Schedule 1 is re-produced in *Appendix 13*, showing that the minimum HGV parking capacity expected is 0.5% of daily traffic flow.
- 6.16 The total number of HGVs which pass along the M42 and A5 on a daily basis has therefore been established. This has been derived from the Highways England's WebTRIS traffic count database, which is available as an on-line facility. The outputs are shown in the table below by direction of travel, for all vehicles over 6.6m in length (considered to be HGVs).

Road	Link	Direction	24hr AWT	% > 6.6m	Total > 6.6m
M42	Within Junction 10	Southbound	26,950	22.6%	6,091
M42	Exit Slip Junction 10	Southbound	8,093	18.9%	1,530
M42	Within Junction 10	Northbound	27,197	23.1	6,283
M42	Exit Slip Junction 10	Northbound	8,758	18.1	1,585
A5	East of M42 Jn 10	Northbound	13,643	16.8%	2,292
A5	East of M42 Jn 10	Southbound	13,730	17.3%	2,375

#### Table 6.2: HGV Traffic Counts on A5 and M42 (WebTRIS)

Source: Highways England WebTRIS

6.17 There are around just over 6,000 HGVs passing southbound on the M42 within Junction 10 on a daily basis, with a further 1,500 HGVs recorded on the southbound exit-slip road at the same junction. Likewise around 6,300 HGVs pass northbound each day within Junction 10, with a further 1,600 on the northbound exit-slip road. A further 2,300 HGVs per direction are recorded on the A5 passing the application site. In total, therefore, just under **20,156 HGVs** are passing M42 Junction 10 on a daily basis. Using the formula based approach of Schedule 1, a minimum capacity of 101 HGV parking spaces should therefore be provided in the immediate vicinity of Junction 10. As noted below, Tamworth MSA currently provides 65 HGV parking spaces, meaning there is a current deficit of 36 HGV parking spaces close to Junction 10. The proposed facility at Junction 10 (the application site) is therefore in a position to meet this identified deficit in parking demand alongside providing an allowance for growth going forward. As noted below, planning permission was recently granted to extend HGV parking provision at Tamworth MSA, although this does not provide for growth in demand.



## **Parking Beat Survey**

- 6.18 To complete the picture, a 'parking beat' survey has been conducted. The aim of the survey was to identify excess HGV parking demand through quantifying the number of HGVs that are presently parking on a typical weekday evening/night at known and potential inappropriate non truck-stop locations in the local area surrounding the application site. Essentially it was a *census* of inappropriate parking across three consecutive mid-week nights, quantifying the number of HGVs that would be attracted to a quality dedicated HGV parking facility if one was available close to Junction 10. For robustness, the methodology adopted mirrors the approach for the National Lorry Parking Survey (2017) and the locations surveyed are detailed in *Appendix 14* of this document.
- 6.19 In this case, "inappropriate non truck-stop locations" are defined as locations which have not been purposely designed to accommodate overnight HGV parking. They are locations which lack dedicated purpose built toilet amenities and permanent food/snack/hot drink outlets and include, amongst other types of sites, waste/derelict land, lay-bys, roads within industrial estates and retail outlet parks. Sites that are within walking distance of a drive-through fast food outlet and toilets primarily designed to serve other land-use functions, such as a supermarket, are classed as "inappropriate non truck-stop locations".
- 6.20 The survey was conducted in a car by a two-person team comprising of a driver and an enumerator across three consecutive mid-week nights. The team followed a set route to each of the identified known and potential inappropriate non truck-stop locations (as described in *Appendix 14*), and at each location the number of HGVs parked was physically counted and noted on paper pro-forma recording sheets. The team undertook two laps of the set route each night. The results of the survey are summarised in the Table 6.3 below. Photographic evidence has been collated to support the observed HGVs.
- 6.21 The results shows that there are in excess of 100 HGVs currently parking on a nightly basis at inappropriate non-truck stop locations within a 5km radius of M42 Junction 10. Averaging the laps and then the three consecutive nights indicates that around 114 HGVs are parking at inappropriate non-truck stop locations each night.
- 6.22 Two key conclusions can be drawn from this extensive survey exercise:
  - Around 114 HGVs are each night parking at inappropriate locations which do not have toilet or washroom facilities, or facilities where drivers can purchase hot food and drinks. Such locations are also likely to be areas which are vulnerable to criminal activity. This survey output, together with the results from the other two quantifying exercises reported above, clearly demonstrate an immediate demand (requirement) for dedicated



overnight HGV parking facilities close to Junction 10 (certainly within the wider Tamworth/A5 corridor); and

If new overnight HGV parking facilities are not to be brought forward at the proposed ٠ application site, based on the evidence of the parking beat survey alternative provision will still need to be delivered elsewhere in the Tamworth/A5 corridor area to address the considerable need identified. Furthermore, this is the case regardless of the planned increase in spaces at Tamworth MSA.



# Table 6.3: Recorded Overnight Lorry Parking at Inappropriate Parking Locations on 12, 13 and 14 October 2021

		Tuesday 1	2 October			Wednesday	13 Octobe	r		Thursday 2	14 October	
Site	Lap 1	Time	Lap 2	Time	Lap 1	Time	Lap 2	Time	Lap 1	Time	Lap 2	Time
Caylon Road, Atherstone	3	18:47	3	22:10	1	18:43	1	22:13	2	18:45	3	22:13
Holly Lane, Atherstone	0	19:00	0	22:08	0	18:50	0	22:20	2	18:50	2	22:20
A5 Corridor	10	18:20	9	22:00	7	18:20	7	22:00	4	18:25	4	22:00
Core 42	0	19:10	0	22:18	0	19:00	0	22:30	0	19:00	0	22:30
Birch Coppice	2	19:15	2	22:39	4	19:10	4	22:28	5	19:12	3	22:38
St Modwen Park	0	19:25	0	22:43	0	19:16	0	22:35	0	19:07	0	22:43
Kingsbury Link and Oil Terminals	16	19:30	17	22:48	13	19:20	14	22:45	11	19:20	12	22:48
Centurion Park	0	19:45	0	23:00	0	19:33	0	22:55	1	19:35	0	22:59
Relay Park	6	19:50	8	23:08	12	19:40	13	22:59	7	19:39	7	23:03
Tamworth MSA	29	19:53	36	23:10	36	19:43	36	23:02	33	19:41	42	23:05
Old Watling Street Corridor	0	19:57	0	23:15	0	19:48	0	23:07	0	19:47	0	23:11
Tame Valley Industrial Estate	16	20:05	19	23:22	12	19:55	19	23:17	17	19:53	21	23:18
Ventura Park	8	20:30	9	23:38	15	20:13	18	23:32	16	20:12	16	23:40
Lichfield Road Industrial Area	6	20:36	8	23:49	9	20:36	7	23:46	6	20:19	8	23:46
Kettlebrook Road Industrial Area	0	20:44	0	00:05	1	20:52	1	00:01	0	20:30	0	00:00
Ammington Industrial Estate	2	20:57	2	00:30	6	21:00	6	00:30	3	20:43	3	00:20
Total	98		113		116		126		107		121	



# 7. ASSESSMENT OF M42 JUNCTION 10 SITE AND ALTERNATIVES

- 7.1 Having identified an overall regional need for additional HGV parking capacity and that the planned Junction 10 facility will address this significant daily need, the purpose of this Section is threefold, namely:
  - To set out the key criteria, along with the rationale, that sites should meet if they are to be considered suitable locations for hosting HGV parking facilities;
  - To appraise, using the identified criteria, the M42 Junction 10 site being promoted by HE as a proposed HGV parking facility, and consequently determine (or otherwise) its overall suitability; and
  - To consider potential alternative sites and proposals in the immediate vicinity.

# Identifying Appropriate Sites for HGV Parks – Criteria Based Approach

7.2 Sites which are considered suitable locations for hosting HGV parking facilities would be expected to meet all of the following criteria to a high level.

Criteria Number	Criteria description
1	The site is a short distance from the strategic highway network.
2	The road infrastructure connecting the site to the strategic highway network is appropriate for accommodating HGVs.
3	The site is located within an area of identified need for secure HGV parking and close to major freight origins/destinations.
4	Located away from residential areas or other unsuitable locations.
5	The site's size and configuration is able to accommodate the key facility requirements for a short-term or short & long-term HGV parking facility (as set out in <i>Section 5</i> ).
6	The ability to access and park at any time over the 24 hour period, 7 days a week.

## Table 7.1: Criteria for Suitable HGV Parking Sites

7.3 In planning terms, more detailed assessments will be required when appraising and determining specific schemes for new HGV parking capacity, such as highway connectivity and other environmental impact measures. However, these criteria are useful in being able to identify sites and ascertain their overall suitability (or otherwise) at an initial high level feasibility (or alternatively discount sites), subject to these more detailed assessments then being satisfactorily completed.



- 7.4 The underlying rationale are fairly self-evident from the analysis presented in the previous Sections. Criteria 1 ensures that any 'diversion' away from the key strategic routes used by HGVs is minimised. For both economic and sustainability reasons, non-essential running away from planned routes should be minimised (in much the same way as empty running). It is also often the case that major freight origins/destinations, particularly large scale distribution centres, are located close to junctions on the strategic highway network. HGV parking facilities located a short distance from access/egress points on the strategic highway network will therefore be in a position to cater for both parking needs simultaneously. This will help ensure that driver/vehicle throughput is maximised; this will be important if revenue needs to be generated to cover running costs. Note that the National Survey of Lorry Parking used a 5km 'cut off' distance from the strategic road network when considering parking capacity.
- 7.5 Criteria 2 will ensure that direct access to the potential facility is via a road which is suitable for accommodating the large numbers of HGVs expected to pass through a HGV park on a daily basis (self-explanatory).
- 7.6 Criteria 3 should ensure that HGV parking facilities are only proposed and subsequently developed where there is a strong likelihood that they will be used on a regular basis. This criteria is in part a 'planning' requirement (proposed schemes should be meeting specific identifiable needs) and also good commercial practice (schemed designed to generate revenue should be properly located in relation to their intended markets). By being close to major freight origins/destinations, this should ensure that the proposed facility is addressing one of the identified parking needs.
- 7.7 Criteria 4 means that residential areas and other unsuitable land uses will not be impacted by the large numbers of HGVs passing through a freight vehicle parking facility. In particular, a HGV park can be expected to have late evening arrivals and early morning departures. In this regard, locating HGV parking facilities close to the strategic road network and major freight origins/destinations is again beneficial as these roads/facilities already have high volumes of HGV traffic during these times. Criteria 5 should ensure that the minimum requirements for HGV parking facilities, as outlined in *Section 5*, can be delivered efficiently within the site boundary.
- 7.8 While *daily rest* periods are predominantly taken over-night, statutory driving *breaks* and *waiting for delivery time slots* take place across the 24 hour period. It is therefore vital that suitable sites are located where access is available 24 hours a day, and that the facilities can be used across the 24 hour period. (Criteria 6).

# M42 Junction 10 – Appraisal of the Proposed HGV Parking Site Against Criteria

7.9 The table below provides an assessment of the M42 Junction 10 site that is being promoted by Hodgetts Estates against the criteria listed above.

Criteria Number	Criteria description	Assessment of M42 Junction 10 Site
1	The site is a short distance from the strategic highway network.	The site is located on and will be directly served from the A5 via a traffic light controlled junction. This junction in turn is located around 400m from Junction 10 of the M42. Conclusion: <b>criteria met to a high level</b>
2	The road infrastructure connecting the site to the strategic highway network is appropriate for accommodating HGVs.	Bancroft Consulting have been commissioned to establish highway access conditions for the development as whole, including trip generation rates. It is understood that these assessments have been accepted by the relevant highway authorities and reference should be made to their technical reports. In general terms however, the A5 Trunk Road, which is a dual carriageway at the point of access into the site, is a major freight route and physically capable of accommodating HGVs. Conclusion: criteria met to a high level
3	The site is located within an area of identified need for secure HGV parking and close to major freight origins/destinations.	An overall need for additional HGV parking capacity in the West Midlands region has been clearly identified by the <i>National Survey</i> <i>of Lorry Parking (DfT)</i> – see Section 3. There is around 560,000 square metres of warehouse floor space within 5km of the site (see Section 6) The analysis conducted in Section 6 above clearly indicates: i) A significant level of inbound HGV activity into the area immediately surrounding the proposed HGV parking facility; ii) A high level of HGV traffic passing on the strategic road network (M42 and A5); iii) A parking beat survey has indicated that on average around 114 HGVs per night are currently parking at inappropriate locations in the Tamworth/Atherstone Area; and iv) The A5 Transport Partnership have identified a need for additional HGV parking capacity along the A5 'growth corridor'.

## Table 7.2: Assessment of M42 Junction 10 Site



Ν

riteria umber	Criteria description	Assessment of M42 Junction 10 Site
4	Located away from residential areas or other unsuitable locations.	The site is located away from unsuitable locations. Mitigation and screening measures are to be incorporated into the scheme.
5	The site's size and configuration is able to accommodate the key facility requirements for a short- term or short & long-term HGV parking facility.	Conclusion: <b>criteria met to a high level</b> The indicative layout plans for the proposed HGV parking facility show that the site's size and configuration is able to accommodate a substantial facility for both short-term and long-term parking. In particular it will have: i) Up to 150 HGV spaces, including spaces for smaller rigid HGVs ii) Parking for both short-term and longer-term overnight needs iii) Barrier controlled access and egress vi) Toilet shower and changing facilities
6	The ability to access and park at any time over the 24 hour period,	<ul> <li>v) Up to 400 square metres amenity building, which can incorporate restaurant/café, convenience store, gym and laundry.</li> <li>Conclusion: criteria met to a high level</li> <li>The planned parking area and facilities will be open and available 24/7.</li> </ul>
	7 days a week.	Conclusion: criteria met to a high level

#### Table 7.2 Continued: Assessment of M42 Junction 10 Site

7.10 We conclude from the above assessment that the proposed site <u>meets all the criteria to a high</u> <u>level</u>. An overall need for additional HGV parking capacity in the West Midlands region has been clearly identified, as set out in the National Lorry Parking Survey and Demand Assessment reports. There is also a specific requirement for facilities close to Junction 10; the analysis in Section 6 has demonstrated significant daily HGV trips into the area surrounding the M42/A5 corridor and passing on the A5 and M42, alongside significant overnight parking at inappropriate locations (parking beat survey). With specific regard to the use proposed, the application site at M42 Junction 10 should be considered a suitable location for hosting HGV parking facilities providing both short-term and long-term requirements..

# Potential alternative Sites

- 7.11 A planned HGV parking facility on land to the west of Hams Hall roundabout (around 1km from M42 Junction 9) is currently subject to a planning application to North Warwickshire Borough Council (*Ref: PAP/2020/0295*). If planning consent is granted, the scheme would comprise:
  - Parking for 200 HGVs both short-term and long-term;
  - Barrier controlled entry to the HGV parking areas;
  - Toilets and shower facilities;





- Café; and
- Fuelling facilities.
- 7.12 The planned development is also well located in relation to the Hams Hall Strategic Rail Freight Interchange. Similar to HE's scheme, it is likely the proposed parking area would provide both short-term parking needs for HGVs delivering into Hams Hall alongside short and long-term parking for drivers seeking somewhere to park while undertaking break or rest requirements.
- 7.13 An assessment of the M42 Junction 9 scheme undertaken on a similar basis to that presented above for the HE proposal suggests that it would also meet all the site selection criteria to a high level. Given the identified deficit in HGV parking capacity across the West Midlands (and in the Dordon-Birch Coppice area in particular), the much publicised national driver shortage issues nationally (to which provision of new and improved HGV parking facilities is a key policy response) and the importance of the A5 'growth corridor' for freight transfer (which will only increase moving forward), it could be argued that there is a clear need for both the Hams Hall (Junction 9) and application (Junction 10) schemes to be delivered (and potentially others).
- 7.14 However, it is worth noting that the Junction 9 scheme also differs from the HE proposal in a number of respects. Importantly, these include:
  - The site is located in the Greenbelt (unlike the application site) and therefore very special circumstances will need to be demonstrated. Planning policy is presented in the submitted Planning Statement prepared by WSP, and reference should be made to that document which addresses the overarching planning case in general and the Greenbelt issue in particular; and
  - Given its location approximately 12km south of the M42/A5 interchange, it is unable to meet the considerable identified need for additional HGV parking capacity in the immediate vicinity of Junction 10 and along the east-west A5 'growth corridor' (as quantified in Section 6 above). As described, the HE proposal is able to cater for both M42 north-south flows and A5 east-west flows simultaneously.

# **Tamworth MSA**

7.15 Tamworth MSA is located to the north west of M42 Junction 10. As noted in the National Survey of Lorry Parking, it is the only 'on-site' facility currently in the vicinity of Junction 10 and the substantial quantum of logistics floor space detailed above. It is a typical multi-user MSA operated by the *MOTO Group*, catering for private car users, coaches and HGVs. Sales of fuel, a variety of refreshment and convenience shop outlets and toilet facilities are provided. Unlike most MSAs, which are accessed directly from the motorway on which they are located, entry is from the M42/A5 junction roundabout meaning that is also serves eastwest traffic passing along the A5. There are currently 65 HGV parking spaces. The National



Survey of Lorry Parking concluded that, based on the utilisation surveys undertaken, that Tamworth MSA was operating at 92% capacity each night in 2017. This is above the 'critical' 85% utilisation rate, meaning it can be considered to be full each night of the week. As noted above, the shortage of suitable 'on site' parking today is likely to be much more acute than that surveyed in 2017 due to the increase in freight traffic and the development of considerable warehouse floorspace close to M42 Junction 10 in the intervening years.

- 7.16 In addition to the current site operating 'at capacity', another issue concerning Tamworth MSA is worth considering which suggests further planning justification for the provision of additional HGV parking facilities in the vicinity of Junction 10 of the M42. Namely, HGV drivers where possible prefer to use dedicated truck stops rather than MSAs. This is reported in the National Survey of Lorry Parking (Pages 33 and 34) with the main reasons for this position given as:
  - Truck stops address more than just functional needs;
  - Drivers feel more welcome than at MSAs;
  - Truck stops tend to have 'sit-down' restaurants with 'home cooked' food; and
  - Parking is perceived to be better value and more secure at truck stops
- 7.17 Therefore, in addition to supplying much needed additional HGV parking capacity close to M42 Junction 10 where a deficit has been identified, the plans would also satisfy a wider need, namely providing truck stop facilities that are preferred by the HGV driver workforce. In doing so, this brand new secure facility will provide a choice to HGV drivers and operators using the M42/A5 corridors, which constitutes the type of industry-led action that national policy supports.



# 8. SUMMARY AND CONCLUSIONS

- 8.1 HE is promoting proposals for a new strategic warehousing scheme on land to the north-east of Junction 10 of the M42 motorway. Incorporated into the scheme is a new HGV parking area capable of accommodating up to 150 vehicles. The new parking area will be able to provide drivers with facilities for short term parking (e.g., statutory driving breaks, access to toilets, etc..) and longer-term overnight parking requirements. The indicative layout for the HGV parking facility is submitted at Appendix 1.
- 8.2 Other than Tamworth Motorway Service Area (MSA), there are no formal HGV parking facilities in the immediate vicinity of Junction 10 or the surrounding A5/M42 corridors.
- 8.3 Drivers are required by law to undertake statutory driving break periods. In many cases these breaks cannot be taken at home depots or while vehicles are being unloaded (for operational reasons), meaning a need for drivers to park their vehicles while out on the road so that these breaks can be undertaken. There is also a need for drivers to park HGVs a short distance away from delivery locations, such as distribution centres, while awaiting allotted delivery times. Likewise, if drivers cannot return to their home depots at the end of a working shift, then there is a need to take *daily rest* requirements while out on the road. Drivers require suitable places to park, as rest periods can be taken in a vehicle but it <u>must</u> be stationary and the engine switched off.
- 8.4 Drivers, as with all employees, are entitled to a healthy working environment. As a minimum, drivers should have the ability to take break periods away from their work location (i.e., the driving cab), purchase food and drink refreshments and visit the toilet at all times. For overnight rest period, drivers should have access to shower and breakfast facilities. This is also important when considering the need to recruit new employees into the sector, particularly women.
- 8.5 Given a deficit of suitable off-road lorry parking capacity in a particular area, this effectively forces HGVs to park inappropriately on the public highway or at other unsuitable locations. The environmental consequences of this include:
  - Parking on the side of a highway and as a result impeding traffic flow, possibly causing congestion;
  - Parking at locations which are incompatible with the noise pollution (running engines, refrigeration units) emitted by lorries e.g., residential area;
  - Causing damage to pavement or footpath infrastructure; and
  - Environmental impacts from litter and, given the absence of toilet facilities, human waste.



- 8.6 Security issues and the concept of 'lorry crime' also need to be addressed, particularly where inappropriate parking is concerned. Organised criminals have in the past targeted freight vehicles, or to be more exact the contents of vehicles, as a source of goods from which to make money.
- 8.7 The DfT's National Survey of Lorry Parking identified a significant deficit of HGV parking capacity in the West Midlands region over 600 parking spaces. Existing sites are effectively operating at capacity each night and around 34% of HGVs parking overnight in the region are doing so at inappropriate locations. Demand for overnight HGV parking is identified as being around 132% of the installed capacity and Tamworth MSA (the only HGV parking area close to Junction 10) is (as of 2017) operating at 92% capacity each night, above the critical 85% utilisation rate. A particular issue has been identified for the M42/A5 corridor and between Hams Hall, Birch Coppice and Dordon. An overall need for additional HGV parking capacity in the West Midlands region has therefore been clearly identified.
- 8.8 Analysis conducted above clearly indicates:
  - A significant level of inbound HGV activity into the area immediately surrounding the proposed HGV parking facility – over 2,100 HGVs are estimated to be visiting the immediate hinterland of the M42 Junction 10 on a daily basis, many of which will require parking facilities;
  - A high level of HGV traffic passing on the strategic road network (M42 and A5) there are currently around 7,500 HGVs passing in each direction in the M42 daily, and a further 5,000 HGVs passing the site on the A5; and
  - A significant level of overnight HGV parking at inappropriate non-truckstop locations within 5km of the M42 Junction 10 an average of 114 HGVs would appear to be parking on a nightly basis within the industrial areas close to Junction 10.
  - A significant level of inbound HGV activity into the area immediately surrounding the proposed HGV parking facility; and
  - The A5 Transport Partnership have identified a need for additional HGV parking capacity along the A5 'growth corridor'.
- 8.9 Combined with the identified regional capacity deficit, this suggests that the planned HGV parking facility will be able to address a significant quantum of this need on a daily basis.
- 8.10 An assessment of the proposed site indicates that it meets all the criteria for a suitable lorry parking location to a high level. With specific regard to the use proposed, the application site at M42 Junction 10 should be considered a suitable location for hosting HGV parking facilities providing both short-term and long-term requirements.



- 8.11 If new overnight HGV parking facilities are not brought forward at Hodgetts Estate's Junction 10 site, based on the evidence of the parking beat survey alternative provision will still need to be brought forward elsewhere in the Tamworth/immediate A5 corridor area to address the considerable need identified.
- 8.12 Given the identified deficit in HGV parking capacity across the West Midlands (and in the Dordon-Birch Coppice area in particular), it could be argued that there is a clear need for both the application (Junction 10) and the Hams Hall (Junction 9) schemes to be delivered (and potentially others). However, the Junction 9 site is located in the Greenbelt (unlike the HE proposal) and therefore very special circumstances will need to be demonstrated. Further, its location approximately 12km south of the M42/A5 interchange means that it is unable to meet the clearly identified need for additional HGV parking capacity along the east-west A5 'growth corridor' and at Tamworth.
- 8.13 Overall, this technical report concludes that there is a compelling case for the provision of new HGV parking capacity at the proposed site. There is a clearly identified need for the provision of additional HGV parking capacity in the area. The site meets the criteria defining a suitable location for HGV parking to a high level and the planned parking facilities are those required by road haulage operators and drivers.









Public bridleway (to be diverted where necessary)



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FAO Mr T Bristow BA MSc MRTPI

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21st December 2018

Dear Mr Bristow

## NORTH WARWICKSHIRE LOCAL PLAN EXAMINATION HGV PARKING AND FACITLITIES AT J10 M42 – REPROVISION OF TAMWORTH SERVICES

The Road Haulage Association (RHA) is the trade association that works on behalf of the UK road transport operators, currently supporting in excess of 7,000 members representing 250,000 Heavy Goods Vehicles (HGVs). We liaise with the profession and represent its interests to Government, lobbying on issues that impact on the safe and efficient movement of goods by road across the UK.

I write in connection with the emerging North Warwickshire Local Plan. Specifically, in relation to Tamworth Services and the associated HGV lorry parking, driver facilities and the services that are located there, which are set to be lost when the new route for HS2 Phase 2b is built out.

#### **Tamworth Services**

Tamworth Services is a dedicated Motorway Service Area (MSA) which provides roadside facilities and parking for both the M42 motorway and A5 trunk road. Tamworth Services currently provides 65 HGV parking spaces and 18 coach parking spaces, as well as 257 car parking spaces. The site also comprises an Esso petrol filling station (PFS), toilets and shower facilities, food and beverage and convenience retail.

The HGV parking and associated facilities at Tamworth Services are extremely important for our members. The facility is located approximately 4 hours from Dover / Folkestone and Felixstowe and presents a logical place to stop when travelling north from the ports. It is a legal requirement for drivers to take their statutory rest breaks as stipulated by the Road Transport Working Time Regulations and Drivers' Hours Rules.

The location of the site is on a high volume traffic route, with many hauliers passing on their route from Bristol in the West, through the West Midlands Conurbation to the ports of Hull and Immingham in the North East as well as those driving east west across the country. With further growth aspirations for this East-West corridor development, the expansion plans for logistics parks located within the Golden Triangle – M1, M6, M42/A5 – and BIFT (Birmingham Intermodal Freight Terminal), these services are vital to the safety and security of drivers and their loads. The National Survey of Lorry Parking published earlier this year provides further background on this and demonstrates the vital strategic links for the freight industry.



#### HS2

We understand that the route of HS2 Phase 2b crosses the site of Tamworth Services and the HS2 safeguarding route, as illustrated on the Proposals Map, covers the whole of the site, which will be demolished to make way for HS2.

Phase 2b is due to be completed and operational in 2033 and the main civils construction works are due to start in 2024. The Environmental Impact Assessment for Phase 2b was recently published for consultation and the Hybrid Bill is due to be placed before Parliament in 2020.

Tamworth Services will be acquired by HS2 Ltd and demolished long before the end of the 'plan period' in 2033. At the very least, therefore, provision for a replacement MSA and associated HGV parking and facilities should be made in the emerging local plan. It is therefore wholly appropriate for consideration to be given to the need for a replacement MSA, the possible location for such and any associated policy provision at this juncture.

#### **National Policy**

#### National Planning Policy Framework (NPPF), 2018

Paragraph 107 of the NPPF recognises the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.

#### DfT Transport Circular 02/2013

Circular 02/2013 confirms there is no longer a requirement to demonstrate need for new MSA sites. Conversely, the need for MSAs is set out in Annex B to the Circular 02/2013 which confirms the spacing between MSAs for the safety and welfare of motorists should be no greater than 28 miles (para. B6). In the absence of Tamworth Services, the distance between Donnington Park MSA and Hopwood Services MSA would be 46 miles. At the moment, Tamworth Services sit 25 miles from Hopwood MSA and 21 from Donnington Park MSA so it is strategically placed to serve the M42 at a critical point on the motorway network. Furthermore, congestion on the M42, M6 and A5 means that Tamworth Services is a safe and convenient place to stop when faced with significant traffic delays that can be present on these routes.

#### National Survey of Lorry Parking, 2017

DfT published the 'National Survey of Lorry Parking' ("NSLP") in May 2018. The report identifies that utilization rate of existing lorry parking provision in the West Midlands is at 87% (Table 5.1, NSLP). The report confirms that at utilisation rates of 85% or more, the availability of suitable parking becomes critical and it is very difficult for additional drivers to find parking spaces (para. 5.2.3, NSLP).

At Table 5.47 of the NSLP, Tamworth Services is identified as having a utilization rate of 92% (critical and full). Anecdotally, we are aware that nearby laybys, business parks and residential estates are regularly used as overspill alternatives to Tamworth Services.

Loss of the HGV parking at Tamworth Services without adequate provision of replacements would exacerbate the already critical lorry parking position, both locally and regionally.



The NSLP also identifies excess demand for lorry parking in the West Midlands of 613 spaces. This national evidence document points to the need for additional lorry parking in the West Midlands. CDO/1 should therefore set out policies for provision of additional lorry parking, preferably on or near to the strategic road network, to address the identified regional undersupply and offset parking which will be lost at Tamworth Services.

#### Land north east of J10 M42, Tamworth

RHA is aware that land adjoining the north-east quadrant of J10 M42 is being promoted for a new replacement MSA, additional lorry parking to meet identified strategic and local need and associated facilities, through the emerging North Warwickshire Local Plan.

We understand that 12 ha of land is being proposed to be zoned for employment purposes and specifically for an MSA and associated facilities via a new employment allocation at the site. Furthermore, that initial highways modelling has been undertaken, as well as works which confirm the site could incorporate significant amount of Green Infrastructure, including screening, tree planting and landscaping, to mitigate any possible visual impacts.

RHA has been in contact with the landowner and scheme promoter, Hodgetts Estates and having considered the scheme proposed, we are in a position to support their proposals for the following reasons:

- As identified through the NSLP, there is an acute shortage of HGV lorry parking spaces at Tamworth Services, the surrounding locale and regionally. The proposals will therefore go some way to addressing this identified need;
- Moreover, the proposals will provide for the existing MSA and HGV lorry parking which will be lost due to the construction of HS2 Phase 2b in a nearby and accessible location, adjacent to the motorway and strategic road network. Failure to provide at least the existing level of lorry parking will exacerbate the identified shortage in the immediate vicinity of J10 of the M42;
- The additional HGV parking spaces proposed would provide drivers with peace of mind when parking up. Truck drivers are becoming more concerned about their own safety and the security of their vehicles, particularly after the terrorist attacks in Nice & Berlin with the use of trucks; and
- Lorry drivers need a variety of refreshments as well as well-maintained facilities such as showers and bathroom facilities at their stops, all of which would be lost when Tamworth Services is demolished to make way for HS2 Phase 2b.

#### Recent appeal decision at Welcome Break, Corley – APP/R3705/W/17/3192501

You may be aware of the recent appeal decision in relation to proposals for additional HGV parking incorporating associated infrastructure and works at the existing MSA at Corley in North Warwickshire, located within the Green Belt. There the presiding Inspector gave weight to our submission in support of the proposals, which identified a number of site specific justifications for additional parking at the site – decision notice attached for reference. As outlined above, many of the same site specific justifications apply similarly to Tamworth.



#### Summary

Almost three-quarters of goods movements are carried by road rather than by rail or water. We need to maximise the use of rail and water freight as part of making the UK's supply chain as efficient, clean and safe as possible, but they can never replace road.

The provision of safe and secure off-road parking facilities for HGVs on key transport corridors, alongside the provision of hygienic catering and bathroom facilities for HGV drivers is a major issue within the industry. The legislation relating to driver rest periods, combined with a proven lack of adequate rest facilities, creates safety and welfare issues for HGV drivers, where stops often have to be made at inappropriate locations. This also creates issues for local authorities across the country, particularly in areas of high road freight activity in and around the main motorway corridors and markets, such as Coventry and Warwickshire. Local Authorities often have to deal with the consequences of HGVs parking within residential areas, industrial estates and in lay-bys, which include crime and security arising from theft from the vehicles, but also community complaints and in some circumstances environmental issues.

The RHA works hard with Government to highlight these issues and influence policy to address it. The Lorry Parking Audit and Demand Study, undertaken by the Department of Transport in 2011, highlighted the key issues and lack of parking in this regard, concluding that the public sector should favourably view proposals from the private sector for new or expanded truck stop and service facilities. These comments are further supported by the DfT National Lorry Parking study published earlier this year and paragraph 107 of the National Planning Policy Framework 2018.

The HE proposals for a new MSA on land at junction 10 of the M42 would be a positive step towards addressing the demand for higher quality facilities in Warwickshire from our members and will assist the local authorities in addressing some of the issues faced from inappropriate overnight parking.

The RHA fully supports the HE proposals for re-provision of the MSA and associated lorry parking at land northeast of junction 10 M42, which is located on a strategic transport corridor and international E-road network (E24) (E-13); a location heavily used by HGVs supporting the logistics and storage/distribution sectors in the area. If the RHA can offer any further assistance to the Inspector in examination of the North Warwickshire Local Plan then please do contact us.

#### Yours sincerely



**Security & Business Affairs** 



AECOM

# **National Survey of Lorry Parking**



# Quality information

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# **Revision History**

Revision	Revision date	Details	Name	Position
1 <sup>st</sup> Draft	19/05/17	Draft Report	James Nankivell	Project Manager
2 <sup>nd</sup> Draft	20/06/17	Final	James Nankivell	Project Manager
3 <sup>rd</sup> Draft	15/01/18	Final Final	James Nankivell	Project Manager

Prepared for: Department of Transport (DfT) and Highways England (HE)

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# **Executive Summary**

# Introduction

The aim of this study is to provide information on the current capacity and demand for overnight lorry parking across England. To do so, a thorough analysis has been conducted across the entire Strategic Road Network (SRN), as well as all lorry parking sites within 5km of the network.

During the month long survey:

- A total of 4509 parking sites were visited, these were made up as follows:
  - 311 lorry parks including Motorway Service Areas (MSAs) (on-site);
  - 801 Industrial / Retail Estates (off-site);
  - 3397 Laybys (off-site).
- 18,670 vehicles were found to be parked overnight across England. The total capacity of on-site spaces was found to be 15,012, hence leaving a theoretical excess of 3,658 vehicles that could not park in an on-site space Figure E1.
  - 39% of all vehicles counted were recorded as parking off-site;
  - 25% of vehicles counted making overnight stops were foreign registered in contrast to the 3.3%<sup>1</sup> of total UK HGV vehicle kilometres that is made up of foreign vehicles.

The following regions have parking that exceeds or is close to exceeding capacity: East Midlands, East of England, North East, South East, West Midlands and South West.



Figure E1: Summary of Parking Demand against Capacity

<sup>1</sup> Department for Transport, 2015 - Road Traffic Estimates: Great Britain 2014 (R)

# On-Site Parking

# Utilisation

The utilisation of on-site lorry parking facilities compares the number of vehicles parked against current capacity - it is a useful indicator for areas where capacity is struggling to meet demand.

A categorisation system has been created to identify when high utilisation becomes problematic:

- At utilisation ≥85% it is difficult for drivers to find parking spaces due to the size of vehicles and the way they are positioned, hence at this point the lorry park is considered to be full in a practical sense.
- As with previous studies we have specified ≥70% utilisation as reaching an increasingly serious level where drivers have to search carefully for spaces.

#### Table E1: Utilisation Categorisation

Description	Utilisation (%)
Critical	≥ 85
Serious	70-84
Acceptable	<69

Six out of nine regions are categorised as having serious or above levels of utilisation, whilst two of these, the East of England and West Midlands are categorised as critical. The average for the whole country is 76%.

Notably the South East is just 1% off being categorised as serious.

# Table E2: Regional Utilisation

Region	Lorry Park Utilisation			
	2010	2017		
East of England	80%	97%		
West Midlands	71%	87%		
South East	71%	84%		
Yorkshire and Humber	47%	76%		
East Midlands	56%	72%		
South West	46%	72%		
North East	50%	60%		
North West	55%	54%		
London	45%	48%		
England	58%	76%		

Utilisation has increased across England by 18% from 58% to 76% in the last seven years (2.6% per year) since the previous survey. If this trend continues then six regions will be categorised as critical by 2024. According to DfT registration figures<sup>2</sup>, 493,600 HGVs were registered in Great Britain in 2016. This represents a fourth consecutive year of increase after five years of decline following the market peak in 2007. In 2016 the number of HGVs on the roads in the UK increased by 2% compared to the previous year<sup>3</sup>. When the previous survey was conducted the freight sector was experiencing some lag from the economic downturn and this may have affected the 2010 results.

In some cases the utilisation for a particular site has been recorded as >100% with the highest being recorded at 305%. Instances where the number of lorries parked is higher than the capacity are due to lorries parking in spaces that are not designed / suitable for lorry parking. This was observed in the form of parking across car/coach parking spaces, on slip roads leading to off-site parking locations and on kerb sides.

# Comparison against previous study

The number of HGVs counted making overnight stops on a typical mid-week night has risen from 13,708 (2010) to 18,670 (2017). This represents a 36% increase (4,962 vehicles). In comparison, the total capacity of on-site spaces available in lorry parks or motorway service areas (MSAs) has increased by just 14% to 15,012.

<sup>&</sup>lt;sup>2</sup> DfT, 2017 - Vehicle Licensing Statistics: Annual 2016. Pg10

<sup>&</sup>lt;sup>3</sup> DfT, 2017 - Road Freight Statistics (June 2015 - June 2016.) Pg1

On average each lorry park has a capacity of 48 vehicles and the lorry parking facilities that have been added since 2010 have an average of 59 spaces per site.

	2010 Data	2017 Data	Difference
Vehicles parked overnight	13,708	18,670	4,962 (36% increase)
On-site spaces	13,173	15,012	1,839 (14% increase)
Number of lorry parks surveyed	280	311	31 (11% increase)
Regions with greater than 70% utilisation	South East West Midlands East of England	East of England 97% West Midlands 87% South East 84% Yorkshire and Humber 76% East Midlands 72% South West 72%	A greater number of regions have high utilisation as Yorkshire and Humber, the East Midlands & South West now also have utilisation over 70%
% of vehicles parking off-site	41	39	2

Table E3: Comparison against previous study

# Facilities and Price

A system was devised to rate all on-site lorry parking facilities as described in the Table E4 below. This rating was based on a five point scale which is broadly in line with LABEL, the European Truck Park Area Certification system. As the system devised does not include all of the LABEL criteria, the results should be used indicatively. Nevertheless, it provides a useful overview of the types of facilities available at lorry parks on a regional basis.

# Table E4: Lorry Park rating basis

Truck Stop Rating	Truck Stop Facilities	Description
1	Toilets	Basic rest area offering truck drivers a place to park and access to toilets.
2	Toilets & Café	Basic/medium rest area offering truck drivers a place to park and access basic amenities.
3	Toilets, Shower & Café	Medium level facility that offers truck drivers a place to park with basic amenities including wash facilities.
4	Toilets, Lighting, Shower, Café, & Security Fence	Medium/high level facility that offers a degree of secure and safe truck parking whilst also offering reasonable facilities for truck drivers.
5	Toilets, Lighting, Shower, Café, Security Fence Accommodation & CCTV	High end truck parking facility offering truck drivers a place to park securely and safely whilst also enjoying extensive facilities.

According to the labelling system outlined in **Table E4** the facilities ranked  $\geq$  level 4 have security provision. Table E5 indicates that just 5% are rated at level 5 and only 21% of facilities across England are rated  $\geq$  level 4 and hence provide security features.

It is important to note that CCTV was recorded through visual auditing, yet stakeholder consultation has indicated that a number of cameras in place are used for Automatic Number Plate Recognition (ANPR) based parking fees enforcement rather than security.

Region	Number of Lorry Parks ranked at each level					Average Price (£)	
Levels of Ranking	1	2	3	4	5	-	
London	25%	0%	75%	0%	0%	£21.70	
East of England	7%	23%	33%	27%	10%	£18.70	
South East	8%	31%	52%	6%	4%	£18.60	
North West	5%	11%	49%	22%	14%	£18.00	
Yorkshire and Humber	6%	6%	73%	12%	3%	£17.20	
West Midlands	8%	16%	47%	21%	8%	£16.30	
South West	8%	16%	49%	24%	3%	£15.50	
North East	6%	19%	63%	13%	0%	£13.50	
East Midlands	9%	30%	48%	11%	2%	£13.20	
England	8%	20%	51%	16%	5%	£16.60	

# Table E5: Lorry Park Ranking – Regional Summary

# Figure E2: Lorry Park Ranking – Regional Summary



The average price for overnight parking across England is  $\pm 16.60^4$ . As expected London, the East of England and the South East have higher than average parking prices due to the high land value in these regions. The North West and Yorkshire and Humber also have higher average prices than the national average which aligns with the level of facilities available in the regions:

- In the North West 36% of facilities are ranked level 4 or 5 in comparison to the national average of 21%;
- 88% of facilities are ranked higher than level 3 in Yorkshire and Humber in comparison to the national average of 72%.

<sup>&</sup>lt;sup>4</sup> Based on this figure the annual cost of paying for overnight parking in on-site facilities is approximately £3,187

# Off-Site Parking (e.g. parking in laybys and industrial / retail parks)

# Appropriate Parking

Whether off-site parking is to be considered as inappropriate for overnight parking is undetermined. However, there is a shortage of HGV drivers and one reason for this is the negative public perception of the industry as well as drivers feeling underpaid and undervalued. Providing drivers with suitable wash and food facilities, to enable them to have a pleasant overnight rest, is important for improving driver morale, perception and road safety. If this is the standard set for what can be defined as 'appropriate' parking then most laybys and industrial/retail parks would then be considered 'inappropriate.' A total of 39% of vehicles were found to be parking off-site. The breakdown of this is as follows:

- 14% of all vehicles counted parking overnight were found to be in industrial estates or retail parks, of these 6% have cafes and 42% are lit.
- 25% of all vehicles counted parking overnight were found to be in laybys, of these:
   6% were found to be lit, 1% have toilets and 2% have a café the cafés observed were usually a portable trailer which closed in the evenings.

With lorry parking averaging at £16.60/night many drivers would prefer to supplement their salary with a tax-free "night-out" payment from their employer and spend the night parked off-site for 'free'. One solution to this problem could be to adapt these locations into 'enhanced' off-site parking facilities having basic amenities for drivers at a modest price.

# Hotspots

The East Midlands was found to have the greatest number of vehicles parking off-site (42% - 1254 vehicles seen). This is shown in **Table E6** where all three indicative factors are high; the M1 corridor has an extremely high off-site parking density as well as the A1 corridor - this can be seen in **Figure E3**.

The SRN surrounding the three ports in the South East and East of England is under a lot of pressure for additional lorry parking. The heat map (**Figure E3**), shows high off-site parking on the M20, A2, A14, A12 and A120 leaving the ports and also in and around the counties of Essex and Kent. Almost all lorry parks within the counties of Essex and Kent are at critical levels of utilisation.

There is high off-site parking density around the Port of Liverpool and no lorry parking facilities close by. A number of those on routes close to the port are at critical utilisation.

The A34 in the South East leading north from the ports of Southampton and Portsmouth has high levels of offsite parking and a high number of serious and critically utilised lorry parks.

Table E6:	<b>Off-Site</b>	and	Excess	Vehicles
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Region	Total Parked Vehicles	Total Vehicles Parked offsite	Percentage of vehicles parked offsite	Excess vehicles
East of England	2,854	731	26%	911
East Midlands	3,032	1,264	42%	865
South East	3,723	890	24%	852
West Midlands	2,519	740	29%	613
North East	745	468	63%	340
South West	1,272	424	33%	188
Yorkshire and Humber	2,032	563	28%	179
London	136	31	23%	-71
North West	2,357	883	37%	-216
England	18,670	7,201	39%	3,658

# **Off-Site Parking Map**



Figure E3: Map to show off-site parking density

# Foreign registered vehicles

All Parking	UK vehicles	Foreign vehicles	All Vehicles	Foreign / Total
South East	2,203	1,520	3,723	41%
London	96	40	136	29%
East of England	2,098	756	2,854	26%
East Midlands	2,341	691	3,032	23%
West Midlands	1,955	564	2,519	22%
Yorkshire and Humber	1,678	354	2,032	17%
North East	619	126	745	17%
North West	1,951	406	2,357	17%
South West	1,074	198	1,272	16%
England	14,015	4,655	18,670	25%

## Table E7: Foreign registered vehicles compared to UK registered vehicles

Across England, 25% of vehicles counted taking overnight stops were found to be foreign registered in contrast to the 3.3% of total UK HGV vehicle kilometres that is made up of foreign vehicles<sup>5</sup>. A high of 41% of the total vehicle traffic (3,723) was recorded in the South East. A number of journeys made by UK vehicles can be completed within the day and do not require an overnight stop.

The percentage of foreign vehicles parked on-site is 1% lower than those parked off-site. In both cases on and off-site parking has the highest proportion of foreign vehicles in the South East. As the majority of international road movements move across the Dover Straits and Channel Tunnel, this is an expected outcome.

London has a notable difference between the numbers of foreign vehicles found on and offsite. One of many reasons for this may be concern over congestion charging.

# Crime

Crime data was collected from NaVCIS for the whole of 2016. NaVCIS highlighted that not every police force reports crime to them and as such there are significant differences in crime statistics from region to region. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worthy of further examination.

The key areas of freight crime have been captured in detail in the regional analysis.

The areas found to have the biggest freight crime problems from data and stakeholder interviews are:

- Northampton (East Midlands),
- Essex (East of England),
- Leicester (East Midlands) and;
- Nottinghamshire (East Midlands).

Unsurprisingly, the area with the highest crime rate is the East Midlands where the number of vehicles counted parking off-site is the highest across the country, making up 17.5% of all off-site parking. The East of England has the highest utilisation and number of excess vehicles - when considering remaining on-site spaces.

<sup>&</sup>lt;sup>5</sup> Department for Transport, 2015 - Road Traffic Estimates: Great Britain 2014 (R)

# Estimation of additional parking required

We have developed immediate and long term responses which could be used to progress developments in increasing lorry parking capacity. The immediate response is focused on specific lorry parking locations that currently are at critical capacity of over 85%. Whereas the long-term estimations are based on all overnight parking compared with current capacity, this considers a situation where all overnight parking occurs on-site.

## Immediate response

The following **Table E8** has been created to aid response decisions, the terminology can be defined as:

- Theoretical: the total number of spaces required if there is an on-site parking space provision for every single lorry counted overnight;
- Practical: the total number of spaces required for every lorry to be able to park in a space overnight considering that a lorry park is, in practice, full at 85% capacity.

To deliver an immediate response, only lorry parks recorded as critical ( $\geq$  85%) were considered, as such London is excluded from the table. Theoretically six regions require additional spaces; yet practically eight regions have been identified as needing increased parking facilities, with the most urgent need found to be in the South East.

# Table E8: Immediate response estimation of additional parking requirements from considering lorry parks currently equal to or above $\ge$ 85% capacity

Region	Theoretical Spaces needed	Practical total spaces needed	Practical number of additional spaces needed	Practical additional spaces needed (%)
South East	210	1,731	470	37%
North East	8	153	31	25%
South West	17	351	70	25%
East of England	58	1,848	335	22%
West Midlands	27	1,262	216	21%
Yorkshire and Humber	15	844	142	20%
North West	-10	472	61	15%
East Midlands	-43	866	87	11%
England	282	7,526	1,411	19%

Taking just the critical areas >85% utilisation, there is an immediate need for 1,411 more spaces across the country (19%), with the most urgent need found to be in the South East where 37% more overnight parking spaces are required.

# 1. Introduction

# 1.1 Introduction

AECOM was commissioned by the Department for Transport (DfT) to undertake research on lorry parking demand in England. DfT wanted to gain a clear picture of the demand for lorry parking and facilities that can be easily updated in the future and require a comprehensive survey, which reviewed the lorry park locations, their capacity and utilisation, as well as other indicators of demands such as lorry parking in laybys and on industrial / retail estates.

The previous national lorry parking survey undertaken by AECOM in 2010 found there was nearly enough parking capacity to meet demand but on average, it was only 61% occupied. 41% of HGVs were parked in lay-bys and industrial estates. Recent publicity suggests the number parked other than in lorry parks and Motorway Service Areas (MSAs) may have increased, with repeated complaints about laybys being full of foreign-registered vehicles. There have also been instances of HGVs parking illegally on motorway hard shoulders.

This survey provides a clear and up to date picture of the amount of inappropriate parking and identifies where there is a shortage of parking facilities.

# 1.2 Aims and Objectives

The overall objective of the work package is to *"undertake a comprehensive review of lorry park locations, including their capacity and utilisation, as well as other indicators of demand, in order to gain a clear picture of the demand for lorry parking and facilities that can be easily updated in the future."* 

There were four specific requirements completed to achieve this objective:

- Determine and map the number, type and capacity of lorry parks
- Determine and record the type of facilities at each lorry parking facility
- Determine and map the utilisation of lorry parks
- Determine and map the extent of other indicators of demand

The primary outcome of this project was to provide DfT with comprehensive data, evidence and mapping of current lorry parking demand that will be used to assess current needs and forecast future demand for lorry parking easily accessible from the SRN in England.

# **1.3 Structure of Report**

This report has been structured as follows:

- Chapter 1 Introduction
- Chapter 2 Methodology
- Chapter 3 Desk based research
- Chapter 4 Consultation
- Chapter 5 Lorry parking audit findings
- Chapter 6 Summary findings

# 1.4 Background

This study focuses on the SRN in England. This network consists of over 7081 KM (4,400 miles)<sup>6</sup> of motorways and trunk roads that are managed by Highways England as well as the M6 Toll. These are highlighted in **Figure 1.1**. One third of all road traffic and over half of all road freight is carried by the SRN.



Figure 1.1: The Strategic Road Network

<sup>&</sup>lt;sup>6</sup> <u>https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/448276/strategic-road-network-statistics.pdf</u>
Whilst sea, air and rail play an important role in the movements of goods in England, the UK economy is very much reliant upon the movement of road freight. Latest Eurostat statistics (2014)<sup>7</sup>, detail that road freight in the UK is by far the most dominant mode of inland freight transport accounting for 87%. Rail accounts for 12.9% and inland waterways 0.1%. According to DfT registration figures<sup>8</sup>, 493,600 HGVs were registered in Great Britain in 2016. This represents a fourth consecutive year of increase after five years of decline following the market peak in 2007. The majority of freight movements start or end with a journey by lorry and it would appear that the needs of the driver and his employer often go unseen.

There is increasing concern that the shortage of lorry drivers experienced in some parts of Europe will get worse as more drivers leave the industry than joining, a problem exacerbated by an aging workforce approaching retirement. One of the issues is that drivers are less willing to sleep in their cab without the ability to take a shower, freshen up and have something good to eat. Also, most employers insist that drivers should not drink alcohol during an intensive driving week and so the traditional picture of trucks parking up overnight near a pub or similar hostelry may be reducing in number.

Rest areas are a vital means of supporting EU Drivers' Hours legislation, which requires regular breaks (at least 45 minutes after no more than 4 hours 30 minutes driving) and a minimum number of rest hours per day. Appropriate facilities ensure that drivers have locations where they can park their vehicles and rest.

It is important therefore to consider the needs of modern logistics drivers and cater for this. Provision can come in several forms, from motorway service stations, lorry parking facilities, lay-bys or private company facilities. However, many private organisations do not want HGVs parked on their premises unless they are specifically being unloaded at the time. There are many issues that lorry drivers encounter during the working week and the need to find somewhere suitable to park each night is just one of them.

This study covers all types of lorry parks (Independent and Local Authority owned lorry parks and Motorway and Trunk Road Service Areas within 5km of the SRN. A common theme is that drivers who are not willing or able to pay for high quality facilities will seek more basic and lower cost options. In order to meet such practical needs and prevent inappropriate parking there are different types of facilities available which will be discussed in this report.

In addition, recent project work conducted on behalf of Highways England by AECOM has involved the collection and analysis of data relating to instances where HGVs have been parked on the hard shoulder. Findings from this analysis have indicated that some drivers are using the hard shoulder illegally to park up and take their 45 minute driving time break.

Theft from HGVs, either the consignment they are carrying or the diesel from their tanks costs the European economy €11.6 billion per annum<sup>9</sup> as well as putting driver welfare at risk. A lack of secure parking areas for HGVs can lead to a greater risk of theft occurring, increasing the costs associated with the supply chain.

DfT has disclosed "repeated complaints about laybys being full of foreign-registered vehicles." A report published by Texaco<sup>10</sup> highlights that over the past decade, the share of UK-registered HGVs travelling out of the UK has shrunk from 15.4% in 2005 to 10.8% in 2014. Foreign-registered HGVs' share of the overall market has risen by 11.7% to 65.7% in that time. The number of HGVs travelling from the UK to mainland Europe (excluding the Republic of Ireland) in 2014 is at the second-highest in the past 10 years at 2.89 million journeys, compared to 2.9 million in 2007.

Many drivers arrive at their delivery points in the evening ready to tip / reload in the morning. Often the companies they are delivering to do not provide them with onsite parking overnight

<sup>&</sup>lt;sup>7</sup> Eurostat, 2014 - Freight transport statistics – modal split. <u>http://ec.europa.eu/eurostat/statistics-</u>

ained/index.php/Freight transport statistics - modal split

<sup>&</sup>lt;sup>8</sup> DfT, 2017 - Vehicle Licensing Statistics: Annual 2016. Pg10

<sup>&</sup>lt;sup>9</sup> Freight watch, 2013. http://www.freightwatchintl.com/intelligencecenter/securitynews/how-much-really-stolen-every-year-europe

or toilets and facilities and so they must park in a lorry park nearby (if there is one) or in a layby or on the industrial park with many choosing the latter because they are free. Due to laybys and industrial estates not having any facilities for drivers. Complaints arise where litter is left by the drivers or the grass verges are damaged by lorry tyres. Many examples were observed first hand by our roving auditors travelling around the country. All of these issues are discussed in more detail later in this report.

# 2. Methodology

## 2.1 Introduction

This section sets out our overall methodology and approach taken to complete the various stages of this study

The methodology is split into a number of key areas from identifying the base information through desk based research and stakeholder consultation to conducting the lorry parking surveys and analysing the results. The following sub-sections below provide the full background details of how we undertook the full range of tasks set out in the scope.

## 2.2 Overview of methodology

Figure 2.1 below outlines the individual work activities of the methodology.



Figure 2.1: Methodology Process

## 2.3 Identifying the base information

#### 2.3.1 Desk Based Research

Extensive desk top research was conducted which took into account existing data including the preceding 'Lorry Parking Study (2010)'. This research helped create the platform from which to launch the practical site audits and survey work and ensured that the most efficient and effective approach was used.

DfT's lorry parking database which included details of existing lorry parking locations, facilities, GPS coordinates, capacity and main point of contact, were reviewed by our team and populated with secondary data collected from desk based research. This included verifying whether the facilities were still active, if there had been any expansions and whether there had been any changes in management. If any changes were identified the database was updated accordingly.

In addition, a detailed search for new parking facilities was conducted using online sources such as:

- www.highways.gov.uk/publications/truckstops-in-England
- <u>www.transportcafe.co.uk</u>
- <u>www.truckanddriver.co.uk</u>
- <u>www.hgvparking.com</u>
- <u>www.truckparkingeurope.com</u>

Any new facilities that were discovered within a 5km radius of the SRN were added to the database.

A key element of this study was to also identify laybys and industrial estates which were within the 5km radius. To assist, a pre-drive assessment utilising Google Maps was undertaken to identify the roads within 5km of the SRN with parking facilities.

Consideration was also given to vehicle and load theft, and a detailed review of crime statistics across England was undertaken by the project team. To support the desk based research, engagement with stakeholders was undertaken to gather their perspective on crime when parking overnight, the findings of the engagement are presented in **Chapter 4**.

#### 2.3.2 Policy review

This study has been guided by a number of policies at European, National and Regional level to ensure it is consistent and any policy changes identified can be incorporated into the study where appropriate. A summary of findings from the policy review can be found in **subsection 3.2** 

#### 2.3.3 Consultation

This study has been developed following a comprehensive stakeholder consultation process. Engagement with stakeholders was conducted via email and telephone interviews. Stakeholders engaged with included:

- Industry trade associations; such as the Road Haulage Association (RHA), Freight Transport Association (FTA), CILT, Unite Union, Transport Focus, Highways England (HE), Food Storage and Distribution Federation (FSDF) and Snap Account.
- Lorry parking managers; and
- National Vehicle Crime Intelligence Service (NaVCIS)

Stakeholder consultation helped to fill gaps found during the desktop research phase and provided valuable and detailed insights into the demand/crime hotspots and stakeholder

views on issues relating to lorry parking. The results from the consultation can be found in **Chapter 4.** 

## 2.4 Audit Planning and Resourcing

#### 2.4.1 Routing and scheduling of audits

As in 2010 the country was split into nine separate regions and each region was assigned an area manager. The regions were as follows:

- North East
- North West
- Yorkshire and Humber
- East Midlands
- West Midlands
- East of England
- South East of England
- South West of England
- Greater London

Each area manager was responsible for planning the nightly workloads of the audit team working in their region. This was done by using a combination of the Esri Collector Application (**See Section 2.5**) and route optimisation software to produce route maps containing multiple destinations for each team to visit each survey night. This approach meant that the amount of time, distance, environmental and financial cost of undertaking the lorry parking audits could be minimised as much as possible.

#### 2.4.2 Resource Planning

This study required the mobilisation of a large number of staff resources. Nine survey teams were allocated to different regions across England. In order to give maximum value and provide local knowledge, some auditors were sourced from offices in or close to the region being surveyed. In the event that an auditor was unavailable due to sickness or other project work commitments, there were reserves on standby ready to step in.

#### 2.4.3 Risk Mitigation

A formal risk assessment process was checked and approved by AECOM's Health and Safety Lead and was signed by all members of the project team. All staff read the risk assessment to make sure that they fully understood it and were fully aware of the risks and how to mitigate them prior to conducting the surveys.

The risk assessment covered a variety of areas to reduce personal risk to staff as well as risk of incidents such as collisions with other vehicles, vehicle breakdowns and driver fatigue. It also took into account each member of staff's emergency contact details. In addition first aid kits were included in the rental vehicles, use of torches whilst on site, appropriate and high visibility clothing whilst on site, regular communication with other members of the audit team and other risks associated with travelling to and from site.

To further reduce risk to staff, each audit team was tracked using 'find my friends' and this enabled the project manager to track teams in real time and locate teams instantly in the event of an emergency.

As well as 'find my friends', a 'WhatsApp Group' was created for project communication. The group included all members of the audit team and was used for communicating any issues relating to the project. Audit team members were also required to check-in with the project coordinator (who monitored the group) at two hour intervals from the moment they started their shift until they returned back to their overnight accommodation.

#### 2.4.4 Briefing Sessions

Before the utilisation surveys were undertaken, the project team was briefed by the project manager and project director. The briefing was presented in two separate sessions as follows:

- **Briefing session one**: covered what the working week would entail, an overview of the project, the roles of the auditors and regional managers, information to be collected whilst surveying, regions to be covered, the number of people per team, scheduling of audits, resource planning, emergency and breakdown procedures, the risk assessment and a list of frequently asked questions from team members.
- Briefing session two: covered route planning and optimisation, instructions on using the data collection mobile application, contact details for regional managers and also provided the opportunity for the auditing team to ask questions on anything they did not understand or were unsure of.

In addition, separate briefing sessions were delivered to regional managers to clarify and rectify any issues they were experiencing prior to the commencement of full utilisation surveys. Further briefing sessions were held with regional managers after the first week of surveying to discuss the working week and any issues experienced (whether collecting data or route planning) which could be solved to make the following week's data collection more productive.

#### 2.4.5 Letter of Authority

Audit teams were required to carry hardcopies of a letter of authority (see Figure 2.2) which demonstrated the authenticity of the study and provided details of project objectives and activities being undertaken during the site visit. It was signed by a DfT representative and it included the project manager's contact details in the event that audit teams were stopped by security at a site or the police whilst surveying offsite locations.





Department for Transport Great Minster House 33 Horseferry Rd Westminster London SW1P 4DR

#### RE: Letter of Authority (National Survey of Lorry Parking)

The Department for Transport (DfT) are keen to get a better understanding of the demand for HGV parking and driver facilities in England so that it can forecast lorry parking demand over the next decade and inform and progress a number of planned lorry parking initiatives.

In order to complete this objective DfT have commissioned AECOM to undertake a comprehensive review of lorry park locations, including their capacity and utilisation, as well as other indicators of demand. As such, AECOM staff will be visiting facilities across England and assessing the following:

- Type of facility (e.g. Independent Lorry Park, Local Authority Lorry Park, Motorway / Trunk Road Service Area, Industrial Estates and Laybys
- Parking charge
- Facilities available (e.g. Toilets, Showers, Café / Restaurant, Security Fence, CCTV, Lighting, Accommodation and any other security features)
- Capacity (e.g. number of parking spaces available)
- Utilisation (e.g. number of parking spaces used)
- Breakdown of UK registered vehicles vs foreign registered vehicles

In order to make an accurate assessment of utilisation, these audits will be conducted after 18:00 hours on Tuesdays, Wednesdays and Thursdays, when the majority of freight traffic will have parked for the night. The audits will cover all facilities within 5km of the Strategic Road Network (SRN).

Audits will begin on 21st February 2017 and are planned for completion by 30th March 2017.

DfT would like you to support the delivery of this project by allowing AECOM staff to access to lorry parking facilities to assess the factors outlined above. Any information and data collected shall only be used for the purposes of this study and shall not be further processed or disclosed without permission.



Position: Head of Freight Policy (Department for Transport)

Should you require further information regarding this project, please contact:

James Nankivell (AECOM Project Manager) Tel: 0161 927 8331 Email: james.nankivell@aecom.com

#### Figure 2.2: Signed letter of authority

## 2.5 Audit and Surveys

#### 2.5.1 Primary Data Collection

The site surveys were used to gather information on each of the lorry parking locations. These details were categorised under the following headings:

- Type, capacity and cost of lorry park
- Facilities available
- Utilisation of lorry park (by UK and foreign registered vehicles)
- Additional comments

Data on the lorry parking sites was collected using a mobile application 'Collector for ArcGIS'. This is a cloud based mapping platform designed by Esri. This 'App' allowed audit teams to digitally record site visit observations using a mobile phone, tablet or iPad.

The revised database formed during the desk based research phase was imported into the 'App' and the GPS coordinates were used to pinpoint each of the lorry parking sites on a map (see **Figures 2.3 and 2.6** below). Each site was allocated an icon depending on what type of lorry parking facility it was. These icons were as follows:



Audit teams were able to collect data using the live atlas mode or offline by downloading area maps to their devices beforehand and uploading collected data to the cloud at the end of their shift when they had access to the internet. The use of the mobile application reduced the time required to process data and made it simpler to update information if required.



Figure 2.5: Selected Truck Stop

Figure 2.6: Edit information of selected truck stop

In addition to the mobile application, audit teams were required to carry hard copies of the data collection form (as shown in **Figure 2.7**) as back up in the event that technology failed

and it did not operate as planned or if it was difficult to enter new lorry parking locations using the mobile application.

AECOM Department por Transport	AECOM Department brighways
Department   Department for Transport   Survey of Lorry Parking - 2017     Name of auditor:   Date:   Type and Capacity of Lorry Park   Region:   Site Name:   GPS Coordinates:   Full Address:   Postoode:   Imail Address:	Vilisation of Lony Park         Theoretical         Capacity (No. of spaces):         Actual Capacity (No. of spaces):         Percentage of park utilised:         In park:         Wumber of UK registered vehicles         Percentage of UK registered         Vehicles in park:         Percentage of foreign registered         Vehicles in park:         Additional Comments
Lony Park Lony Park Road Service Arress	
Parking Charge:	
Facilities Available	
Toilets Showers Cafe / CCTV Lighting	
Security rence     Accommodation       Other Security     features /       Additional features     Image: Control of the security	

Figure 2.7: Manual data collection form

#### 2.5.2 *Pilot utilisation survey*

To fully calibrate the mobile application and ensure everything was working as it should, it was necessary to undertake a pilot survey prior to the full utilisation survey. The pilot survey was undertaken by the project manager and project coordinator in the North West region where a total of 35 sites were visited.

The pilot survey provided the opportunity to get a better understanding of how the audits should be conducted during the full utilisation survey. It aided the process of offering advice to regional managers on how to plan their audit schedules more effectively, what to avoid whilst conducting the surveys and provided an indication of how many sites could realistically be visited by the audit teams each night.

#### 2.5.3 Full utilisation survey

The full utilisation surveys were undertaken during the evenings between the hours of 6pm and 2am on Tuesdays, Wednesday and Thursdays throughout the month of March 2017. There was a team assigned to each of the nine regions and each team consisted of two team members. All of the truck stops, industrial estates and laybys were visited in England within 5km of the SRN. The total number of lorry park locations visited is presented in **Table 2.1**.

#### Table 2.1: Total number of lorry park locations visited by type

Lorry Park Type	Number visited
Truck Stops including MSAs	311
Industrial Estate	801
Layby	3,397

The results of the utilisation survey are presented in Chapter 5.

A number of key truck stops were visited a second time in early April 2017 to verify that the data collected was broadly correct and the utilisation of the lorry parks had not been skewed by an unknown event. The results of the second visits are presented in **Chapter 5**, but in essence our finding is that there is little overall variation in vehicle numbers using facilities on a midweek working day from one week to the next. Hence the 'snapshot' approach used by this and previous studies provides a robust set of data.

### 2.6 Analysis and evaluation

#### 2.6.1 Analysis and evaluation

**Chapter 5**, **and 6** present the headline information from the surveys along with conclusions from a variety of factors considered.

## 3. Desk Based Research

## 3.1 Introduction

In this chapter we present key findings from materials found online and of those provided or referenced during stakeholder engagement. **Table 3.1** outlines the documents reviewed and their sources.

#### Table 3.1: Documents Reviewed

Document Title	Author(s)	Theme
Directive 2010/40/EU	European Commission	EU Directive
Directive 2008/96/EC	European Commission	EU Directive
Road Investment Strategy(RIS): for the 2015/16 to 2019/20 Road Period	DfT	Policy/Strategy
Secure European Truck Park Operational Services (SETPOS) Project Handbook	European Commission	Policy/Strategy
Security and Service at Truck Parking Areas Along the Trans-European Road Network – Handbook for Labelling	European Commission/ DG Move	Policy/Strategy
The Future of Transport: A Network for 2030 (2004)	DfT	Policy/Strategy
The National Planning Policy Framework (2012)	Department for Communities and Local Government	Policy/Strategy
The Strategic Road Network and The Delivery of Sustainable Development (2013)	DfT and Highways Agency	Policy/Strategy

## 3.2 Policy Review

In this section, we have reviewed a number of European and National policy and strategy documents that relate to or are closely linked to the provision and standards of lorry parking facilities on the SRN.

#### 3.2.1 EU Directives and Regulations

#### Directive 2010/40/EU

Regulation (EU) No 885/2013 supplements ITS Directive 2010/40/EU of the European Parliament and of the Council with regard to the provision of information services for safe and secure parking places for trucks and commercial vehicles.

The Directive requests the Commission to define specifications for the provision of information and reservation services for safe and secure parking places for trucks and commercial vehicles (Intelligent Truck Parking).

#### Directive 2008/96/EC

This Directive relates to on-road infrastructure safety management and recognises that a sufficient number of safe rest areas are important for crime prevention and road safety. This legislation also ensures through road safety impact assessments and audits, that when new road sections are built, adequate and safe parking areas are foreseen.

#### Regulation EC No 561/2006

This regulation provides a common set of EU rules for maximum daily and fortnightly driving times, as well as daily and weekly minimum rest periods for all drivers of road haulage and passenger transport vehicles.

#### 3.2.2 LABEL

LABEL is a certification system for lorry parking facilities in Europe. The scheme consists of five categories of security and service quality requirements for lorry parking areas. The five categories range from 1 to 5, of which level 1 is the basic level whereby basic facilities and security measures are in place and 5 is the highest level whereby there are a variety of high quality facilities and high security measures in place.

LABEL describes the security measures at a truck parking area as the steps that have been taken to create conditions for better security. Some examples of security measures include fencing, CCTV, prevention of unauthorised entry/exit, lighting, records of all incoming and exiting vehicles, alarm procedures and the availability of pre-booking of parking. The criterion for security at a truck parking area is shown in **Figure 3.1** below:

Security Level 1	Providing the Basics
A	Level 1 Truck Parking Areas (TPAs) offer some basic security features. A requirement is that the site is recognisable as a parking area. Driving and pedestrian areas are well-lit. Elemen- tary security checks take place.
Security Level 2	Technical Measures to Improve Security
00	Security level 2 adds to the level 1 requirement that the TPA is either surrounded by a continuous fence or that there is a CCTV system that monitors the perimeter. The parking is well-lit. Vehicles that are allowed to park are indicated by a sign. A CCTV monitors entrances/exits. Security checks take place by TPA staff or a professional organisation. CCTV images are clear and stored safely.
Security Level 3	Security Measures are Combined, Access of Persons Restricted
000	Security level 3 adds to the level 2 requirement that both a fence and a CCTV system monitoring the perimeter need to be in place. The site is set up for good visibility. Constant measures are taken to keep the fence in a good condition. Only truck parking users or staff are allowed access. Criminal incidents are reported.
Security Level 4	Real Time Monitoring of Vehicles and Persons by Professional Staff
0000	Security level 4 adds to the level 3 requirement that on-site or remote staff monitor vehicles and pedestrians real time. Registration of vehicles and drivers takes place. Guards and staff are trained professionals, their references are checked. They are equipped to be able to react quickly to an alarm situation. Pre-booking is possible. Gates are closed.
Security Level 5	Verification of Vehicles and Persons by Professional Staff, Site Manned Around the Clock
	Security level 5 adds to level 4 that the site is manned around the clock. The identity of all vehicles or persons that enter is verified and logged. The fence is equipped with an anti- intrusion system and protected against a truck intentionally driving through. CCTV covers the entire area of the TPA

#### Figure 3.1: LABEL Security Standards

The service level is measured by the amount of characteristics that are considered serviceenhancing. The service is divided into a number of categories, including comfort and dignity, food and shopping, safety and other services such as a fuel station, cash machine, internet, truck wash/repairs and laundry. The higher the service level criteria the better the service will be at a selected truck parking area.

#### 3.2.3 **SETPOS**

SETPOS was a pilot project initiated by the European Commission — Directorate General for Energy and Transport ( $\in$ 5.28m co-funded) in June 2007. The project responded to the growing concerns about attacks on high value cargo and vehicles, coupled with the lack of adequate rest facilities for drivers<sup>11</sup>.

LABEL is closely linked to the SETPOS project and builds on the information and findings from that project.

Label takes into consideration a number of factors including:

- Security are drivers, goods and vehicles in a secured environment?
- Comfort and dignity for example can drivers take a shower?
- Food and shopping for example are warm meals provided?
- Services for example can basic repairs be undertaken?
- Safety for example traffic safety at the truck parking area

We developed a system to rate all on-site lorry parking facilities and the rating was based on a five point scale which is broadly in line with LABEL the European Truck Park Area Certification system (this rating system is illustrated in **Chapter 6**). As the system devised does not include all of the LABEL criteria, the results should be used indicatively. Nevertheless, it provides a useful overview of the types of facilities available at lorry parks on a regional basis.

#### 3.2.4 The National Planning Policy Framework (2013)

This policy requests local authorities work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. This includes facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user.

The policy states that local planning authorities should work with other authorities and providers to:

- Assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- Take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

The National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date local plan should be approved and, proposed development that

<sup>&</sup>lt;sup>11</sup> https://ec.europa.eu/transport/sites/transport/files/modes/road/parking/doc/2010\_04\_28\_setpos\_project\_handbook.pdf

conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.

#### 3.2.5 Road Investment Strategy (RIS): for the 2015/16 – 2019/20 Road Period

The RIS sets out an ambitious vision for the future of the network – 'by 2040, the network will be smoother, smarter and more sustainable.' In the RIS the Government highlights many of the key challenges faced by the network namely:

- The network is struggling to cope in the face of increasing demand and the volume of high speed traffic
- Delays to journeys deter investment and constrain the ability of business to compete
- Stop-start funding available for roads investment has made it difficult to plan for the long term
- Vehicle emissions and noise significantly impact local communities
- Our customers need better and more up to date information to manage their journeys

## 3.2.6 The Strategic Road Network and the Delivery of Sustainable Development (2013)

This document sets out the way in which Highways England will engage with communities and the development industry to deliver sustainable development and economic growth, whilst safeguarding the primary function and purpose of the strategic road network.

It replaces the policy set out in Department for Transport (DfT) Circular 02/2007 Planning and the Strategic Road Network and DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on Motorways and All-purpose Trunk Roads in England. Annex B of the document provides policy for facilities on the SRN. The policy applies to all existing signed roadside facilities and proposed signed facilities.

#### Statutory Rest Breaks

The policy recognises the need for commercial vehicle drivers to take statutory rest breaks and that roadside facilities assist drivers and operators in compliance with these requirements.

#### Spacing of Facilities

The policy provides that the network of SRN service areas has been developed on the premise that opportunities to stop should be provided at intervals of approximately half an hour. However recognising congestion and other factors, the policy states the following.

"Highways England therefore recommends that the maximum distance between motorway service areas should be no more than 28 miles".

The distance between services can be shorter, but must comply with the requirements of the Design Manual for Roads and Bridges.

#### Local Planning Authorities Role

The local planning authorities are responsible for assessing applications for new or existing facilities in line with relevant planning legislation and regulation.

In relation to the role of the local planning authorities, the policy says that local planning authorities should not consider the merits of sites beyond conformity with the spacing criteria. Further to this, the policy says that the planning authority should not seek to prevent competition between operators; rather they should determine applications based on their specific planning merits.

#### Highways England Role

Highways England is a statutory consultee within the planning system and encourages local authorities and developers to engage with Highways England regarding any roadside developments at the earliest opportunity.

Highways England only supports proposals for or within service areas if it can be shown that there will be no overall increase in trip mileage or adverse impact on safety or operation of the network.

#### Private Sector Role

The policy recognises that it is the role of the private sector to promote and operate service areas that meet the needs of the travelling public.

#### Parking Charges

The policy states that where facilities charge for parking over the mandatory two hour free parking period, the charges for parking must clearly be displayed in the parking area and amenities building. Further to this, cash payments for parking must be accepted.

#### SRN Facilities Signing

The policy provides minimum requirements that roadside facilities must satisfy in order to be eligible for signing from the SRN. These requirements are shown in **Table 3.2** overleaf.

Minimum Requirements to be eligible for signing	Moto	rways	APTR Service Area*	Truckstops on Motorways	Truckstops Signed from SRN	Truckstops on All- purpose trunk roads
M = Mandatory P = Permitted	Service Area	Rest Area				
Open minimum 12 hours per day between 8am and 8pm every day except Christmas Day, Boxing Day and News Years Day	N/A	N/A	м	N/A	м	М
Free parking for up 2 hours minimum for all vehicles permitted to use the road served by the facility (see schedule 1)	М	М	м	м	м	М
Free toilets / hand washing facilities with no need to make a purchase	м	M	М	м	м	м
Shower and washing facilities for HGV drivers including secure lockers in shower / washing area	М	Р	Р	м	Μ	М
Fuel	M	Р	М	М	Ρ	Р
Hot drinks and hot food available at all opening hours for consumption on premises	М	Р	Р	м	Р	Р
Hot drinks and hot food available 8am to 8pm for consumption on premises	N/A	Р	М	N/A	М	м
Access to a cash operated telephone	М	M	М	М	М	Μ
Use as an operating centre for the purposes of Good Vehicles (Licensing Operators) Act 1995 or Public Passenger Vehicles Act 1981	Prohibited	Prohibited	Prohibited	Prohibited	Р	Р
Limited to a single or exceptionally 2 adjoining in trunk road.	nterconnected pro	emises, accesse	d directly from th	e trunk road or dir	ectly from a junc	tion on the

Table 3.2: Minimum Requirement for Signage of Facilities

The policy provides an exception for the roadside signing of truckstops if they are within two miles of the SRN and otherwise meet requirements for signing, as long as vehicles would not have to pass through residential areas.

#### Parking Requirements

The policy provides a method for calculating parking requirements for different types of vehicles in Schedule 1. In the case of HGV parking at MSAs, the parking requirement is 0.5% of the average daily flow of goods vehicles for the peak month and should be based on the most recent complete years' worth of data.

The policy prescribes that at trunk road service areas; there must be a minimum of two standards of HGV parking spaces.

A self-help tool known as HATRIS is available to use for completing these calculations<sup>12</sup>.

#### 3.2.7 The Future of Transport: A Network for 2030 (2004)

The White Paper on the Future of Transport sets out the approach the Government will take in developing infrastructure and services to safeguard the country's economic, social and environmental wellbeing.

Within this context the policy chapter makes reference to freight and states:

"Local and regional regulation – we will encourage local authorities to consider how their various regulatory powers that relate to freight transport (traffic and parking regulations, night-time bans, planning powers and the use of planning

<sup>&</sup>lt;sup>12</sup> <u>https://data.gov.uk/dataset/highways-england-network-journey-time-and-traffic-flow-data</u>

conditions) can be co-ordinated to make life easier for businesses while protecting the interests of local people."

## 3.3 Logistics Hubs

There are a number of locations in England where logistics activity is most concentrated and are considered prime locations. Traditionally, the Midlands area bounded by the M1, M6 and M42 known as the 'Golden Triangle' (**see Figure 3.2**) has been seen as a key hub for logistics activity in the UK.



Figure 3.2: UK Golden Triangle of Logistics

The region benefits from its proximity to the motorway network and the fact that the majority of locations in England, Scotland and Wales can be reached within 4.5 hours driving. This means that goods vehicles can return to base for reloading within driving time regulations (maximum of 9 -10 hours driving per day). Some of the largest logistics hubs in the UK such as Magna Park are located in the Golden Triangle.

In the North of England and Scotland, Warrington and Manchester have the highest rents per  $M^2$  and land values per acre, which are comparable to the rates in the 'Golden Triangle'<sup>13</sup>.

Within London, the cost of logistics sites is much greater than elsewhere in the UK. The highest rents in the capital are seen close to Heathrow, which is also the UKs number one air freight hub, handling 65% of all air freight. **Table 3.3** outlines the UKs major logistics hubs.

<sup>&</sup>lt;sup>13</sup> <u>http://www.colliers.com/en-gb/uk/insights/industrial-rents-map</u>

Regions	Sub-regions	
London	<ul><li>Heathrow</li><li>Barking/ London Gateway</li></ul>	
Midlands	<ul> <li>Northampton</li> <li>Daventry</li> <li>Lutterworth</li> <li>Hams Hall</li> <li>Kegworth</li> </ul>	
North of England	<ul><li>Warrington</li><li>Manchester</li><li>Wakefield</li></ul>	

Table 3.3: Major UK Logistics Hubs

## 3.4 Freight Crime

Freight Watch International (FWI) estimates that freight crime costs European Union (EU) Member States €11.6 billion in the loss of goods each year. In reality, the figure could be much higher as other factors such as repair costs, replacement goods, contractual penalties, hire vehicle/equipment costs, insurance premium increases and administration/investigative costs are difficult to assess.

At present, the UK is the third worst country in the EU for cargo thefts. Only Germany and the Netherlands have higher rates of such crimes<sup>14</sup>.

High-value consumer goods are the preferred cargo for thieves as they can quickly and easily be sold on. Recent high-profile thefts from laybys on the A14 reported thieves taking £62,000 worth of TV's on one occasion and £66,000 worth of fashion clothing on another.

The CART Report recognises the issue of freight crime reporting throughout Europe. The report cites an EU study conducted in 2007 that includes the following statement<sup>15</sup>:

"There is no simple way to provide a clear picture of the extent and nature of the theft of goods and commercial vehicles in Europe. In most countries vehicle and goods theft is not seen as a priority and few resources are given to collecting and analysing data on it."

TruckPol was the body responsible for compiling freight crime data however; it was disbanded in 2012. In 2016, the National Vehicle Crime Intelligence Service (NaVCIS) established a 'freight desk' following industry support and now collates UK freight crimes from roughly half of police forces, industry and open sources.

We engaged with NaVCIS as part of the stakeholder consultation element of this project. The results of this consultation are displayed in **Chapter 4** of the report.

## 3.5 Driver and Operator Opinion

Transport Focus published a report detailing road users' views of roadside facilities in July 2016. In this sub-section, we have provided some of the key findings from the report from engagement with lorry drivers and transport operators.

Lorry drivers have more complex needs than other users of roadside facilities. Drivers must comply with driving time regulations and may face prosecution for non-compliance. As such, roadside facilities are of a greater significance to lorry drivers compared with other road users.

Lorry drivers tend to compare MSAs with truck stops and in general, they prefer to use truck parks. Some of the reasons for this include:

<sup>&</sup>lt;sup>14</sup> <u>https://NaVCIS.police.uk/portfolio-item/NaVCIS-freight-2/</u>

<sup>&</sup>lt;sup>15</sup> European Parliament, 2007 – Organised Theft of Commercial Vehicles and their Loads in the EU (2007)

- Truck stops address more than just functional needs
- They feel more welcome than at MSAs
- Truck stops tend to have 'sit-down' restaurants with 'home cooked' food
- Parking is perceived to be better value and more secure at truck stops

Some lorry drivers use laybys frequently for either short breaks or overnight stops. Due to the absence of facilities, many drivers are forced to relieve themselves outside. While many drivers are now used to this, they do not think it is acceptable.

As well as the absence of facilities, drivers were of the opinion that stopping at laybys was unsafe due to the proximity to fast moving traffic and short slip roads.

In some cases, laybys are being removed due to safety concerns. While drivers do not object to this, they feel that the capacity needs to be replaced elsewhere.

Transport operators suggested that the requirement to take regular breaks, monitored by tachograph combined with the lack of parking capacity is contributing to driver recruitment and retention problems.

Operators agree with drivers that truck stops are better than MSAs overall, however they are too few in number and often require significant detours to reach them.

Operators were of the opinion that obtaining planning permission and funding is a major barrier to developing more lorry parking facilities.

In relation to lorry parking, one of the main conclusions of the report is as follows:

"Highways England should develop a strategy to ensure there is sufficient capacity for lorries to park in the right places and with facilities that meet drivers' needs. It will need to work with the freight industry, government, local authorities and others to do this."

## 3.6 **Overnight Subsistence**

When a driver has to spend a night away from home a tax free payment may be made to cover essential personal expenses. Where drivers have a sleeper cab a reduced rate of 75% of the allowance may be paid.

The tax-free amount or "scale rate" is the maximum amount that can be paid to lorry drivers. The changes in scale rate, calculated in January each year are shown in **Table 3.4**.

Year ended	Payment per Night	Payment for sleeper cabs (75%)
31 December 2013	£34.90	£26.20
31 December 2012	£33.85	£25.39
31 December 2011	£32.20	£24.15
31 December 2010	£30.75	£23.06

**Table 3.4: Driver Subsistence Payments** 

From 2010 to 2013, payment per night increased by 13.5%. The rate of inflation has averaged 2.7% per year between 2010 and 2016 and therefore £34.90 in 2010 would be worth £36.19, showing that the increase in payment per night has fallen behind inflation<sup>16</sup>.

Between 2013 and 2017 there has been no increase in the maximum tax-free subsistence payment that can be paid to drivers.

HMRC does not make the payments mandatory but does set maximum rates that can be paid without tax and national insurance. As such, some operators may choose to pay less than the maximum rates depending on individual company policy.

An employer paying above the tax free allowance will have to pay tax on the excess amount. However there are some exceptions of claims over the allowance. For example if a HGV

<sup>&</sup>lt;sup>16</sup> <u>http://www.bankofengland.co.uk/education/Pages/resources/inflationtools/calculator/default.aspx</u>

broke down or temperatures dropped to a point where it was not possible to stay in the lorry. The outcome is case specific but any claim that is a personal choice and not in the interest of the business would be rejected and tax would have to be paid.

From April 2017, new requirements have been brought in, changing the agreement that has stood for the past 26 years. There are no changes in the amount of tax-free allowance but the operator is now required to do more in order to claim. The new rules are as follows:

- In order to pay the overnight allowance free of tax and National Insurance up to the • agreed rate, currently £26.20, the operator must have a bespoke allowance agreement with HMRC. Operators request a five-year agreement showing that drivers were genuinely away and in a subsistence position and showing that a random sampling of drivers' receipts in line with HMRC guidance.
- A checking system must be in place to ensure that drivers are genuinely away and in a subsistence position. This is the same as has been required for the past 26 years.
- A system for random checking drivers' receipts, to check they are incurring costs, • must be in place. HMRC states that 10% of drivers must have their receipts checked each month.

The £2 mid-day meal allowance is unaffected by any of these changes. The allowance can be paid free of tax and without reference to HMRC.

Evidence of an overnight stay can include<sup>17</sup>:

- Receipts
- Drivers' log sheet •
- Drivers' expenses claims •
- Receipts obtained on payment for lodging (for example hotel bills)
- Parking receipts and itinerary records kept by the employer in the pay records, or separately, as evidence of nights away from home and permanent workplace

HMRC has confirmed that the costs of buying specialist bedding, fridge, microwave etc., where these are bought by the driver, are not recognised. Further to this, parking costs are not recognised.

The system has been described as a "very grey area" within HMRCs rules and regulations by an accountancy firm<sup>18</sup>.

The RHA have been opposed to the changes that came into place in April 2017 for several years since they believe that the system has worked well and that the change is unenforceable in practice and will disadvantage compliant hauliers in terms of cost and recruitment. They are also strongly critical of the way HMRC approached the issue, since wrong dates were released and not resolved quickly<sup>19</sup>.

<sup>&</sup>lt;sup>17</sup> https://www.gov.uk/hmrc-internal-manuals/employment-income-manual/eim66120

 <sup>&</sup>lt;sup>18</sup> http://www.caseron.co.uk/travel-subsistence-overnight-expenses/
 <sup>19</sup> https://www.rha.uk.net/getmedia/781f25d3-3144-4e13-8b24-0b366d1a4197/overnight-allowance-update-revision 1.pdf.aspx

## 3.7 Types of Lorry Parking

There are a number of different types of lorry parking facilities, which for the purpose of this project have been considered under the titles 'on-site' and 'off-site' parking. Examples of on-site parking include motorway and roadside facilities as well as independent truck parks with dedicated spaces for goods vehicles.



Figure 3.3: On-Site Lorry Parking Example

There is an existing network of lorry parking facilities in England which as identified in **Section 4.2.6** have been developed on the premise that opportunities to stop should be provided at intervals of approximately half an hour (or no more than 28 miles) on the SRN.

**Figure 3.4** shows extracts from the Highways Agency (now Highways England) Truckstop guide which was last updated in 2009.



Figure 3.4: Highways Agency Truckstop Guide Extract (2009)<sup>20</sup>

<sup>20</sup> http://www.highways.gov.uk/publications/truckstops-in-England

Off-site parking has been considered as locations that are not suitable for goods vehicles to park overnight. This includes roadside laybys and industrial estates, which although commonly used and in many cases legal, are considered inappropriate for overnight parking due to a lack of welfare facilities for drivers. The image below illustrates off-site parking in an industrial estate.



Figure 3.5: Example of Off-Site Lorry Parking<sup>21</sup>

<sup>&</sup>lt;sup>21</sup> <u>http://www.rugbyadvertiser.co.uk/news/safety-fear-over-lorries-parked-in-somers-road-industrial-estate-in-rugby-1-4041776</u>

## 4. Consultation

## 4.1 Introduction

This chapter of the report details the consultation undertook with a range of stakeholders with an interest in lorry parking. This includes trade associations, trade unions, infrastructure operators, enforcement agencies and other relevant organisations.

The project team conducted a number of telephone interviews with stakeholders in order to garner their thoughts and organisational stance on a range of issues such as lorry parking shortage hotspots, planning conditions, crime and pricing.

In addition to direct consultation, we have conducted desktop research for information on stakeholders' stance with regard to lorry parking. **Table 4.1** outlines the organisations that we have engaged with during this element of the project.

#### Table 4.1: Stakeholder Consultation

Organisation	Date(s) of Consultation
Chartered Institute of Logistics and Transport (CILT)	27/03/2017 & 23/03/2017
Road Haulage Association (RHA)	23/03/2017
Unite the Union	23/03/2017
Freight Transport Association (FTA)	28/03/2017
Highways England	21/04/2017 & 28/04/2017
Food Storage & Distribution Federation (FSDF)	24/04/2017
National Vehicle Crime Intelligence Service (NaVCIS)	24/04/2017
Kent Police	21/04/2017
SNAP	25/04/2017
Extra Services	21/04/2017
Welcome Break	28/04/2017

The consultation findings have been grouped under themes rather than according to the opinions of particular individuals or organisations. The theme groupings are as follows:

- Parking Shortage Hotspots
- Parking Policy
- Parking Pricing & Overnight Allowances
- Planning Policy
- Best Practice
- Crime

## 4.2 Parking Shortage 'Hotspots'

This subsection outlines the areas of the country where stakeholders felt that the shortage of lorry parking facilities is the most pronounced. Generally, there was agreement that the level of provision is insufficient in terms of capacity and inconsistent in terms of standards and facilities. A number of stakeholders held the view that the level of provision at logistics hubs and distribution centres is a particular issue.

Service area operators are aware of the lack of capacity at some of their sites. One such operator is in the process of adding over 200 additional spaces across three of their most well utilised sites in the South of England and recently gained planning permission for additional spaces at one site. Another operator also has expansion plans.

In some areas, laybys are being closed due to repeated problems with the negative aspects of overnight lorry parking e.g. litter, anti-social behaviour, prostitution and crime. While this addresses the immediate issue of HGVs parking in laybys, it only displaces the lorries. Thurrock, Grantham and Kent were identified as locations where layby closures have occurred recently.

#### Locations

Stakeholders highlighted the following areas as having particular HGV parking shortage issues:

- South Leicester (Magna Park), Milton Keynes, Northampton Arc
- Around Daventry Intermodal Rail Freight Terminal (DIRFT)
- Hams Hall to Dordon (around Birch Coppice)
- North West Liverpool to Salford Corridor
- South Surrey/Hampshire Border
- M25 Periphery (Cobham in particular)
- Humber Region

**Figure 4.1** shows the areas of the country identified by stakeholders as having a shortfall in lorry parking provision, excluding Kent, which is covered separately in the following subsection.



Figure 4.1: National Parking Shortage 'Hotspots'

## <u>Kent</u>

Kent was discussed repeatedly during consultation. Issues relating to lorry parking in Kent have been well publicised in recent years particularly in relation to Operation Stack. In terms of numbers, the CILT and Kent Police agreed that there is a shortage of between 1,000 and 1,200 HGV parking spaces in Kent.

Parking issues are more pronounced in Kent due to the Port of Dover and the Channel Tunnel (Folkestone). It was suggested that issues are exacerbated by the fact that the Eurotunnel shuttle journey, which takes 35 minutes, may not be long enough to count as a full 45-minute driving break. However, the 45 minute break can be taken in smaller cumulative portions of 30 and 15 minutes. It was suggested that drivers are arriving in the country and needing to take driving breaks within a relatively concentrated area.

Another contributory factor is that other Western European countries do not permit weekend rest to be taken in the cab and actively enforce against it. Fines were described as being significant (>€1,000) and drivers are made to get out of their vehicles. Also several European countries do not allow the movement of HGVs during certain times of the weekend. This may prompt patterns of vehicle movement to factor this in.

Some operators are involved in cabotage and a recent report on the Kent lorry parking situation suggests that drivers are 'touting' for work in the area. The HGV Road Levy was introduced with the intention of using funds to enforce cabotage and in some regions; it is used for such purposes. Some stakeholders reported seeing foreign articulated vehicles offloading to smaller foreign vans in public areas such as car parks and this practice is fairly common.

Between February and April 2016, Kent Police fined or 'moved-on' 494 trucks that were illegally parked on hard-shoulders or slip roads of the M20, A20 and A2. The RHA has been calling for improved enforcement against illegal parking on motorways across the country, reflecting the concern of its members.

Stakeholders suggested that additional parking capacity is required in the following areas or at existing facilities within Kent:

- Gravesend/Cobham
- Lydden
- Northeast Maidstone
- Sevenoaks (M25/M26)
- Ashford
- Stop 24 Folkestone

**Figure 4.2** shows the areas within Kent where stakeholders suggested there is a need for additional parking provision.



Figure 4.2: Kent Parking Shortage 'Hotspots'

## 4.3 Parking Policy

#### Trade Associations

The CILT National Policy Committee conducted an investigation into the driver shortage in 2014/15 and suggested that there is a national shortage of 50,000 HGV drivers in the UK. Unite the Union suggested that although people generally do not want more lorries and drivers, consumer attitudes and the introduction of free returns is leading to an increased need for them.

Suggested reasons for the driver shortage and the failure to attract young people to the industry include:

- Inadequate driver welfare and insufficient parking
- Poor perception of the road haulage sector
- Young people's parents also have a poor perception of the industry
- Perception of low pay and unsociable hours

It was suggested that EU co-workers are plugging much of the driver shortage. The CILT estimates that there are 140,000 EU co-workers filling gaps in UK supply chain when forklift truck and van drivers are included.

Some European lorry drivers are working for less than £1,000 per month, which is approximately 40% less than the average monthly wage for UK based drivers (£1,650). While this has a cost benefit to the supply chain and end-users, it has many negatives including exacerbating lorry parking issues.

It was suggested that retailers are happy that large logistics companies are undercutting each other as it makes their supply chain overheads cheaper.

The FTA is in the process of developing the Commercial Vehicle Operators Facilities Charter, which will set out the associations' position with regard to lorry parking facilities. This will consider the following areas:

- New roads programme
- Provision of services (surface, bay dimensions, facilities and cleaning, catering value for money, fuel including gas and bio-diesel, security of vehicle, load and driver, fee consistency and payment systems)
- Welfare facilities at Distribution Centres (DCs)
- Parking provision requirements at or near to DCs

The RHA welcomes the government's commitment to tackling illegal lorry parking but suggests that the issue can only be solved by better legal parks to help drivers who are often desperate to find parking for their legal breaks<sup>22</sup>.

The RHA supports measures that require industry to use appropriate, secure parking where provided and sensibly priced.

#### <u>Standards</u>

There was agreement between different stakeholders that there are too many different standards for lorry parking facilities such as Park Mark, LABEL/SETPOS and British Parking Association. It was suggested that there is a need for a single standard and a means of ensuring it is put in place.

<sup>&</sup>lt;sup>22</sup> <u>https://www.rha.uk.net/news/press-releases/2016-11-november/rha-welcomes-government-commitment-to-tackle-illeg#sthash.I746uSmD.dpuf</u>

## 4.4 Parking Pricing & Overnight Allowances

It was suggested that there should be more clarity on lorry parking charges. Laybys should have signage stating that they are only to be used for emergencies or for short stay. If laybys are being used for more than two hours of parking, there should be a fee and enforcement.

The majority of facilities do not charge for the first two hours of parking so drivers can usually take their shorter mid-shift rest breaks without incurring any parking charges.

Overnight parking can cost up to £30 per night for 'good quality and secure' parking at motorway services areas. Many companies will not pay or reimburse drivers for secure parking and those that do may only pay up to £26.50.

The reason for this limit is that it is equal to the maximum tax-free allowance from HMRC of  $\pounds 26.50$  per day for 'in-cab' rest. This means drivers make no profit from their allowance or they have to pass parking facilities to get to one that their company will cover.

Many drivers are able to keep their allowance if they do not use it on parking. This can be a considerable increase to their pay and this can be the reason why laybys are sometimes preferred.

There is inconsistency particularly among foreign operators in the level of payment for overnight rest. Some European operators pay up to €55.00 per night (approximately £47.00) whereas others may pay nothing.

## 4.5 Planning Policy

Stakeholders made a range of comments relating to the planning process and requirements. These related to large-scale logistics developments such as warehousing, new highways and highways upgrades.

One stakeholder suggested that at present, there is gap in DfT lorry parking policy, which the DfT consider a local planning issue but in their opinion, local authorities are not addressing issues. In some cases, local authorities are looking for developers to invest in lorry parking facilities while in other regions, facilities have been allowed to close down.

All stakeholders agreed that there is a need to consider lorry parking facilities during the planning process. This is part of the process for other developments e.g. a new block of flats might not be approved if insufficient parking is provided, so it was felt that this model exists.

Some industry associations informed us that they have supported planning applications for additional secure lorry parking facilities across the UK.

#### 4.5.1 Highways

Some stakeholders suggested that in the case of new roads, developers are not considering the need for lorry parking facilities. One stakeholder suggested that the A1 in North Yorkshire is a case of such oversight, where until recently there has been a lack of rest areas.

In cases where trunk roads have become motorways, parking facilities have been lost. Planning policy provides that motorways must have rest areas every 28 miles or 30 minutes; however stakeholders suggested that when a trunk road becomes a motorway, there is no such planning requirement.

#### 4.5.2 Class B8 Developments

Class B8 developments (storage and distribution) are inevitably going to attract large numbers of goods vehicles. If drivers visiting a site run out of driving hours or need to take a break then there should be an area for them to do this. Often drivers are forced to park inappropriately, in the surrounding area.

The CILT and FTA both suggested that planning policy should include a requirement for proportional levels of parking provision at Class B8 developments.

#### 4.5.3 Section 106 Condition

It was suggested that Section 106 planning conditions could be used to mitigate the effects of inappropriate parking associated with distribution centres.. If this was applied, local authorities would be able to get developers to fund the inclusion of parking facilities at new developments. At present, it was felt that large developers and site occupiers do not take responsibility for vehicles after they leave the gates.

#### 4.6 Driver Welfare

Stakeholders agree that access to toilets during the course of a drivers' working day is a serious issue. In some cases, drivers are not allowed to use facilities at DCs and this exacerbates problems on the network. The reasons given for this have previously related to security concerns and health and safety. However, the HSE - Workplace Health, Safety and Welfare Regulations 20 & 21 provide that drivers should be able to use such facilities.

Truckers Toilets UK (TTUK) is a campaign group which seeks to improve access to and quality of facilities for drivers on the network and at distribution centres. The group's angle is that not allowing drivers to use facilities is damaging to their health and may encourage them to drink less to reduce the number of times they must use toilets.

Drivers may stop at motorway service areas during the course of their working day to use the facilities. In some instances, the parking area is full and they are forced to park inappropriately and may be issued with a penalty charge notice (PCN). Trade associations did not disagree with penalties for inappropriate parking however; there are some places where the next service area could be 30 miles away. This is a particular issue in the South East as facilities are often full but also across the network e.g. from Wetherby Services heading north.

### 4.7 Best Practice

Some British and European operators have agreements in place with lorry parking facilities. These include reserving parking bays and permission to complete trailer swaps on site. Although some operators have this agreement in place, it was suggested that others use laybys for trailer swaps.

Stakeholders said that some good quality facilities have been opened on the network in recent times and cited Road King Holyhead (North Wales) and Exelby Services (Yorkshire) as examples.

Some operators have arrangements with third parties, which allow drivers to pay for parking and other tolls on their fuel card or another dedicated card. This means that drivers do not have to worry about cash payment and operators get one itemised invoice. Some lorry parking facilities accept such payment schemes but do not offer meal vouchers if drivers use this system as they do for cash or card payments.

The Police suggested that around 85% of drivers are on regular runs and as such, should have reasonable knowledge of infrastructure and the ability to better plan their parking.

Some DCs do provide good facilities for visiting drivers as highlighted by the following comment:

"Dachser in Northampton has excellent facilities for drivers visiting their premises." – Trade Association Member.

## 4.8 Crime & Enforcement

Stakeholders expressed that the levels of Police for the enforcement of lorry parking and related issues are 'massively under-resourced'. Some stakeholders felt that the situation was getting worse.

#### 4.8.1 Layby Usage

Parking in laybys is not an offence unless there is a byelaw or Traffic Regulation Order (TRO) in place; or vehicles are parked in a dangerous manner. As an example, many laybys in Kent have no byelaws/TRO in place. As such, the Police approach to 'moving on' vehicles is risk based. Vehicles protruding into the carriageway or damaging verges will be moved but those that are parked within the layby are often not.

The police are aware that 'moving on' trucks only displaces the problem so before carrying out enforcement, they tend to visit nearby truck parking facilities so that they know whether there is capacity for the vehicles which they move on. Some stakeholders believe that lorry parking on industrial estates is not a particular issue, as long as littering and kerb damage does not happen.

In some regions, police work with Highways England Traffic Officers to move on vehicles as it allows them to cover a greater area. If the Highways England officers are ignored, then police will support them.

Police are able to issue a £30 parking fine to vehicles in areas where parking is not permitted or where vehicles are parked in manner that is deemed to be dangerous. The police suggested that there needs to be a regulatory review of the current fines as they are roughly the same as one nights HGV parking. It was also suggested that 'blanket TROs' should be considered in some areas, if and when there is sufficient parking provision.

#### 4.8.2 Load Theft

In terms of load thefts, vehicles carrying high-value easily transferable goods such as cigarettes and alcohol were described as 'prime targets' for criminals. Unite the Union said that although load thefts were an issue in the UK, they do not tend to get that many complaints relating to it.

Curtain slashing is a particular problem at MSAs, where criminals cut open curtainside trailers to see what goods are on-board. It was suggested that organised gangs are operating in certain areas with Yorkshire and the Northamptonshire-Bedfordshire border identified as particular crime hotspots. Such gangs are aware of where vehicles will be parked and use stolen vehicles to steal loads.

Such thefts are the reason why many trucks can be seen with the rear trailer doors open if parked for the night. The cost of a replacement curtain is in the region of £1,000 however; in some cases it is possible to 'patch' the damaged curtains.

Although still considered an issue by trade associations, some police forces suggested that load theft crime is much less prevalent than it has been in the past, at least in their region. This notion was also supported by some service area operators who suggested that issues with curtain slashing had become less prevalent in recent times.

#### 4.8.3 National Vehicle Crime Intelligence Service (NaVCIS)

NaVCIS gathers vehicle crime intelligence from UK police forces, industry, open sources and European law enforcement agencies. This intelligence can then be used to spot emerging trends and help put resource in place to stop them. Following private funding support, NaVCIS has established a 'freight desk' targeting freight transport crime in the UK.

NaVCIS produce a Freight Bulletin that details instances of theft across various regions. From reviewing these documents, there are a number of suggested load theft 'hotspots'<sup>23</sup>:

- A45 Flore, Northamptonshire
- Leigh Delamere Services M4 J17-18, Wiltshire
- Swift Valley Industrial Estate Rugby, Warwickshire
- Forum Drive Rugby, Warwickshire
- Leicester Forest East Motorway Services M1 J21a-J21, Leicestershire
- Purfleet and Grays, Essex
- A12 Wiltham, Essex
- A66 Penrith, Cumbria
- A1 North Muskham, Nottingham

#### 4.8.3.1 Crime Data

In this section, we have provided a high-level analysis of freight crimes reported to NaVCIS in 2016. The total stolen value of all freight crimes reported to NaVCIS, including those at operating depots and those in Scotland and Wales is estimated to be £51.7 million.

It must be stressed that not all freight crime is reported to NaVCIS, while the data is useful, it does not provide a full picture of the national situation. NaVCIS believe that around half of forces are reporting to them. They would like all forces to report to them and stressed that there is a need for national reporting into a central database.

The database includes crimes recorded in 37 out of 43 police areas as it includes data from direct reporting, the industry and open sources. **Table 4.2** shows the worst ten regions by police force for crimes reported at laybys or industrial estates, MSAs and truckstops.

Rank	Police Force	Crime Count	Value Stolen (£ millions)
1	Northamptonshire	231	£9.9m
2	Essex	185	£8.6m
3	Leicestershire	105	£3.4m
4	Nottinghamshire	75	£3.3m
5	Thames Valley	71	£1.5m
6	Cambridgeshire	57	£1.2m
7	South Wales	51	£1.0m
8	Hertfordshire	47	£1.8m
9	Derbyshire	44	£1.2m
10	Bedfordshire	37	£1.9m

Table 4.2: Freight Crime Ten Worst Regions by Number of Reported Incidents

**Table 4.2** shows that Northamptonshire is the worst region for freight crime. Further analysis shows that crimes in Northamptonshire equated to  $\pounds 9.9$  million, which is almost one quarter (24%) of the total for England.

Northamptonshire up to Leicestershire marks the centre point of the so called 'Golden Triangle' of national distribution centres for the whole UK. Hence, the density of warehousing and distribution movements attracts the highest levels of criminal activities.

Kent, although highly publicised for its parking issues, is not in the worst regions in terms of freight crime. Kent is ranked 11<sup>th</sup> with 30 recorded crimes.

There were 1029 reported freight crimes in England, which occurred at laybys or industrial estates, MSAs or dedicated truckstops. The total 'value' of goods stolen from these crimes

<sup>&</sup>lt;sup>23</sup> http://www.bifa.org/information/national-vehicle-crime-NaVCIS

exceeds £42 million but this would be greater if other factors such as damage, downtime and insurance were considered.

**Figure 4.3** provides a breakdown of reported crimes in England by location type and the sum of their reported 'stolen value'.



#### Figure 4.3: Freight Crimes by Location Type and Cost

Almost three quarters of crimes reported took place at laybys or industrial estates. In terms of value, crimes at laybys/industrial estates account for over three quarters (77%) of the total stolen value during the year.

It is also notable that over one quarter (26%) of these crimes took place at MSAs. This is concerning as these facilities are seen as 'secure parking' by many in the industry and cost between £20-30 per night to park.

Some stakeholders suggested that security at MSAs is insufficient. Further to this, there is a belief that CCTV is not used for crime prevention but for ensuring parking fees are levied to those staying over the free parking period (typically 2-3 hours) and the data appears to support this.

## 4.9 Summary

This section summarises the key points raised by stakeholders during the consultation phase, particularly those where there was agreement by multiple parties on a particular topic or issue:

- The provision of lorry parking is a national issue in terms of capacity and quality.
- There are a number of areas where stakeholders feel the issues are most pronounced (Figures 4.1 and 4.2).
- Stakeholders agreed that the issue is most pronounced in Kent and suggested that there is a need for 1000+ additional lorry parking spaces.
- The shortage and quality of driver facilities contributes to the sectors negative public perceptions and compounds recruitment issues.
- There is a driver shortage in the UK and it is 'plugged' by EU workers.
- Trade associations support measures requiring operators to use appropriate secure parking facilities but stressed that there is a need to increase overall capacity and improve quality at some facilities.
- There should be more clarity on lorry parking charges.
- Stakeholders suggested that there is a need for better communication between DfT and local authorities in relation to lorry parking, as issues, which DfT considers the local planning authority's responsibility, are not being managed.
- Lorry parking facilities should be considered during the planning process, particularly for class B8 developments.
- In some areas laybys are being closed without additional parking provision elsewhere. Local Authority planners need to understand that lorry parking is a national issue and that drivers must legally stop after set period to take rest.
- There were mixed responses relating to load theft. Some stakeholders felt that the situation was improving at their site or region however data suggests it is a serious issue.

# 5. Lorry Parking Audit Findings

## 5.1 Introduction

This chapter presents the detailed results from the data analysis of the lorry parking audits, including both national and regional results. A shorter summary of the findings appears in **Chapter 6.** 

#### 5.1.1 Audit Highlights

- During the month long survey, 18,670 vehicles were counted parked overnight across England in off-site and on-site locations. Each site was counted for a single weekday night.
- The total capacity of on-site spaces available in lorry parks or motorway service areas (MSAs) was found to be 15,012.
- Therefore, when compared with the total number of vehicles counted, there was an excess of 3,658 vehicles that could not be parked even if every parking space could be filled.
- 311 on-site lorry parking facilities were surveyed across England. Lorry parking facilities include:
  - Motorway service areas (MSAs) with overnight lorry parking options
  - Independently owned/managed truck stops
  - Trunk road service areas
  - Local authority truck park
- 801 industrial estates and 3397 laybys were also surveyed.
- Regions with ≥70% utilisation of lorry parks include:
  - East of England 97%
  - West Midlands 87%
  - South East 84%
  - Yorkshire and Humber 76%
  - East Midlands 72%
  - South West 72%
- 39% of all vehicles recorded were parked off-site in laybys or Industrial Estates.

### 5.2 National Findings

#### 5.2.1 Introduction

This section provides a national overview of the study results. It aims to inform stakeholders of the broad trends and highlight the key findings at the national level. It discusses the factors influencing demand, including:

- Number of facilities and spaces available;
- The level of on-site parking (utilisation);
- The level of off-site parking (lay-by and industrial estates);
- A comparison of the number of Foreign and UK drivers, and;
- An overview of the types of facilities available to drivers on-site.
### 5.2.2 Locations of all lorry parking facilities

A map showing the locations of all truck stops (311), laybys (3397) and industrial estates (801) that were visited can be seen in **Figure 5.1** as expected the laybys display a structure mirroring the strategic road network, and most industrial estates and lorry parks are close by.

To achieve the brief every stretch of the SRN was visited and through desk based research lorry parks and industrial estates within 5km of the SRN were identified and also visited, the routes leading to these sites were also included in the survey.



Figure 5.1: All locations visited

### 5.2.3 Utilisation of on-site lorry parking facilities

This section shows the total number and type of facilities in England, and how these are split across regions. This includes the number of spaces provided by each type of facility.

The study recorded 311 sites across England allowing overnight parking. These sites had a total capacity of 15,012 parking spaces. The on-site utilisation of these sites varied across regions, from 48% to 97%, with the national average being 76%.

Two thirds of all regions have serious lorry park utilisation (above 70%) and five out of nine regions have parking which exceeds or is close to exceeding capacity as seen in **Figure 5.2** – this indicates that there is insufficient capacity to meet demand in many places.

Region	Sum of capacity	Total Number of Vehicles	Utilisation
East of England	1,943	1,892	97%
West Midlands	1,906	1,663	87%
South East	2,871	2,423	84%
Yorkshire and Humber	1,856	1,418	76%
East Midlands	2,167	1,550	72%
South West	1,084	783	72%
North East	405	244	60%
North West	2,573	1,397	54%
London	207	99	48%
England	15,012	11,469	76%

Table 5.1: Utilisation by Region

A system has been used to categorise lorry park utilisation – see **Table 5.2**. This is similar to the categories used in the previous studies in 2010.

As with previous studies we have taken 70% full as reaching a seriously full status where drivers have to search carefully for spaces. At utilisation of 85% or more it becomes critical and very difficult for additional drivers to find parking spaces depending on the size of vehicles and the way they are positioned. So in practice drivers may say a lorry park which is utilised at greater than 85% may in fact be full.

#### Table 5.2: Utilisation Categorisation

Description	Utilisation (%)
Critical	≥ 85
Serious	70-84
Acceptable	<69



### Figure 5.2: Utilisation by region

The East of England and West Midlands have critical utilisation of over 85%, closely followed by the South East where the utilisation is 84% - **Figure 5.2**.

#### 5.2.3.1 Excess Demand

The level of excess demand shows the relationship between the total capacity of a region and the total number of vehicles parking in that region. A large excess indicates that at a regional level there is a problem with a lack of spaces – **See Table 5.3.** Only the North West

and London appear to have sufficient lorry parking capacity as they are the ones with a negative figure in the excess column.

Region	Lorry Park Capacity	Total Parked Vehicles	Excess Vehicles
East Midlands	2,167	3,032	865
East of England	1,943	2,854	911
London	207	136	-71
North East	405	745	340
North West	2,573	2,357	-216
South East	2,871	3,723	852
South West	1,084	1,272	188
West Midlands	1,906	2,519	613
Yorkshire and Humber	1,856	2,032	176
England	15,012	18,670	3,658

Table 5.3: National overview of result

Figure 5.3 shows a breakdown of the number of vehicles parked in lorry parking facilities, industrial estates and lay-bys. The bar (maroon line) indicates the total capacity of lorry parking facilities surveyed in that region.

This demonstrates that the East Midlands, East of England and North East had more vehicles parking than there was space, additionally the South East and West Midland regions are also close to exceeding capacity. This survey was conducted in a representative month, March. However there are seasonal fluctuations in some types of freight goods transport traffic that mean it is possible that these regions could be over capacity during busy times of the year.

There is evidence to suggest that some drivers choose to park off-site in lay-bys or industrial estates even when spaces are available on-site - for example the North East has a lower capacity than total trucks parked yet overall utilisation is only 60% - see Figure 5.2.



Figure 5.3: Number of vehicles parked by region and parking type

### 5.2.3.2 Overview of facilities available to drivers

A system was devised to rate all on-site lorry parking facilities as described in **Table 5.4** below. This rating was based on a five point scale which is broadly in line with LABEL the European Truck Park Area Certification system. As the system devised does not include all of the LABEL criteria, the results should be used indicatively. Nevertheless, it provides a useful overview of the types of facilities available at lorry parks on a regional basis. Standard 4 and 5 have security features.

Truck Stop Standard Level	Truck Stop Facilities	Description
1	Toilets	Basic rest area offering truck drivers a place to park and access to toilets.
2	Toilets & Café	Basic/medium rest area offering truck drivers a place to park and access basic amenities, including toilets and a cafe.
3	Toilets, Shower & Café	Medium level facility that offers truck drivers a place to park with shower facilities as well as toilets and a cafe.
4	Toilets, Lighting, Shower, Café, & Security Fence	Medium/High level facility that offers a degree of secure and safe truck parking whilst also offering a decent level of facilities for truck drivers.
5	Toilets, Lighting, Shower, Café, Security Fence Accommodation & CCTV	High end truck parking facility offering truck drivers a place to park securely and safely whilst also enjoying extensive facilities.

#### Table 5.4: Facility rating basis



Figure 5.4: Regional split of rated facilities at lorry parks

Region		Number of Lorry Parks ranked at each level								Average Price (£)	
Levels of Ranking		1		2		3		4		5	-
East Midlands	4	9%	14	30%	22	48%	5	11%	1	2%	£13.20
East of England	2	7%	7	23%	10	33%	8	27%	3	10%	£18.70
London	1	25%	0	0%	3	75%	0	0%	0	0%	£21.70
North East	1	6%	3	19%	10	63%	2	13%	0	0%	£13.50
North West	2	5%	4	11%	18	49%	8	22%	5	14%	£18.00
South East	4	8%	16	31%	27	52%	3	6%	2	4%	£18.60
South West	3	8%	6	16%	18	49%	9	24%	1	3%	£15.50
West Midlands	3	8%	6	16%	18	47%	8	21%	3	8%	£16.30
Yorkshire and Humber	2	6%	2	6%	24	73%	4	12%	1	3%	£17.20
England	22	8%	58	20%	150	51%	47	16%	16	5%	£16.60

### Table 5.5: Number of lorry parks and their ratings in each region

The North West has the highest proportion of highly rated lorry parks, meaning these have the most facilities including security features; this is also represented in cost as the North West has the second highest average pricing.

The East of England and West Midlands also have a significant proportion of highly rated parks.

The majority (51%) of lorry parks have a rating of three which denotes good amenities but no security features.

London and the North-East do not have any secure lorry parks; this is because the region denoted as London only considers areas within and not including the M25.

London has the highest priced Lorry Parks as expected, however this does not relate to facility ranking but the high land cost.

### 5.2.4 Offsite parking

**Table 5.6** below shows the amount of vehicles parking in lay-bys, industrial estates compared to the utilisation of on-site parking facilities in each particular region. The three regions with the highest on-site utilisation have particularly high levels of off-site parking; Eastern, South East and West Midlands. The East Midlands also had a high level of parking in lay-bys.

Regions	Lorry Parks	Industrial Estates		Lay	Total Off-site	
	On-site utilisation	Number of Sites Visited	Number of Vehicles Parked	Number of Sites Visited	Number of Vehicles Parked	Number of Vehicles Parked
East Midlands	72%	115	561	559	921	1,482
South East	84%	128	235	554	1,065	1,300
East of England	97%	26	107	470	855	962
North West	54%	150	536	357	424	960
West Midlands	87%	86	352	362	504	856
Yorkshire and Humber	76%	95	258	276	356	614
North East	60%	108	298	287	203	501
South West	72%	67	130	523	359	489
London	48%	26	15	9	22	37
England	76%	801	2,492	3,397	4,709	7,201

### Table 5.6: Offsite parking

**Figure 5.5** and **Table 5.7** show that the East Midlands has the highest number of vehicles parked off-site. The East Midlands also has the second largest percentage of vehicles parked offsite at 42%. It is likely that this is due to high demand for parking in industrial estates as a number of distribution centres are in this area and many have no provision for lorry parking after delivery. The East Midlands also has the highest issues with freight crime across the UK.

The North East has a high percentage of off-site vehicles parked but this is likely due to the low capacity of lorry parking as well as a lot of the off-site parking being centred near the Port at Teesport.

The South East has the second highest number of total vehicles parked off-site and the highest number for total vehicles counted parking overnight.

Region	Lorry Park Capacity	Total Parked Vehicles	Total Vehicles Parked offsite	Percentage of vehicles parked offsite
North East	405	745	468	63%
East Midlands	2,167	3,032	1,264	42%
North West	2,573	2,357	883	37%
South West	1,084	1,272	424	33%
West Midlands	1,906	2,519	740	29%
Yorkshire and Humber	1,856	2,032	563	28%
East of England	1,943	2,854	731	26%
South East	2,871	3,723	890	24%
London	207	136	31	23%
England	15,012	18,670	7,201	39%

### Table 5.7: Off-site Parking Summary

To create **Table 5.8** the length of the SRN in each region was estimated using the google maps measuring tool, in doing so the number of vehicles found parked per km of SRN could be used as a basis to compare data across regions. The higher the number for "parking density" shows that there is a high off-site parking in relation to the length of SRN within a region.

As expected, the regions with the highest number of excess vehicles in a region also have a high number of vehicles per km of SRN and the three areas of highest lorry park utilisation also have an off-site parking density above 1 vehicle/km.

East Midlands has 72% utilisation but has high off-site parking, it has the highest density of vehicles parked off-site and the second highest number of excess vehicles, and this is also evident from looking at **Figure 5.5**.

Region	Lorry Parks	Industrial Estates	Laybys	Off-site (Laybys and Industrial Estates)			All Parking
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density vehicle/km of SRN	Excess vehicles
East of England	97%	107	855	962	840	1.1	911
East Midlands	72%	561	921	1,482	550	2.7	865
South East	84%	235	1,065	1,300	1,210	1.1	852
West Midlands	87%	352	504	856	700	1.2	613
North East	60%	298	203	501	430	1.2	340
South West	72%	130	359	489	1,080	0.5	188
Yorkshire and Humber	76%	258	356	614	780	0.8	179
London	48%	15	22	37	360	0.1	-71
North West	54%	536	424	960	1,130	0.8	-216
England	76%	2,492	4,709	7,201	7,080	1	3,658

 Table 5.8: Off-site Parking Density and Excess Vehicles



Figure 5.5 – Off-site density and On-site utilisation

### 5.2.5 UK and Foreign vehicle parking comparison

Across England 25% of vehicles counted taking overnight stops were foreign registered in contrast to road freight data which suggests that 3.3%<sup>24</sup> of total UK HGV vehicle kilometres are made up by foreign registered vehicles. This confirms that a number of journeys made by UK vehicles can be completed within the day and do not require an overnight stop.

The range of foreign vehicles parked overnight in UK lorry parking areas was from 17% in the North East to 41% in the South East – as shown in **Figure 5.6.** The percentage of foreign vehicles parked on-site is 1% lower than those parked off-site. However, in both cases (on and off-site parking) the highest proportion of foreign vehicles is in the South East. The majority of international road movements move across the Dover Straits and Channel Tunnel, so this is an expected outcome.

London has a notable difference between the numbers of foreign vehicles found on and offsite, one of many reasons may be concern over congestion charging.

<sup>&</sup>lt;sup>24</sup> Department for Transport, 2015 - Road Traffic Estimates: Great Britain 2014 (R)



Figure 5.6: UK to Foreign vehicle comparison for all overnight parking

All Parking	UK vehicles	Foreign vehicles	All Vehicles	Foreign / Total
East Midlands	2,341	691	3,032	23%
East of England	2,098	756	2,854	26%
London	96	40	136	29%
North East	619	126	745	17%
North West	1,951	406	2,357	17%
South East	2,203	1,520	3,723	41%
South West	1,074	198	1,272	16%
West Midlands	1,955	564	2,519	22%
Yorkshire and Humber	1,678	354	2,032	17%
England	14,015	4,655	18,670	25%

### Table 5.9: UK to Foreign vehicle comparison for all overnight parking

### 5.2.6 Major ports in England and strategic corridors connecting to the ports

The heat maps below identify areas of high off-site parking in relation to 10 main ports, the locations considered are:

- Liverpool
- Bristol
- Southampton
- Portsmouth
- Dover
- London Gateway
- Felixstowe
- Immingham & Grimsby
- Hull
- Teesport.

Ovals, which are 10km wide and 50km in length, have been overlaid onto the map, **Figure 5.7**, with their origins starting at key ports – the dimensions of the ovals have been created to highlight the audit boundaries of 5km from the SRN and 50km being within an hour's driving distance of the port - meaning one can reasonably assume that a proportion of the parking in this area is related to the port.

Key areas of high offsite density are surrounding the port of Dover, London Gateway, Felixstowe, Southampton and Liverpool.

The SRN surrounding the three ports in the South East and East of England is under a lot of pressure from lorry parking. The heat maps show high off-site parking on the M20, A2, A14, A12 and A120 leaving the ports and also in and around the counties of Essex and Kent. Almost all lorry parks within the counties of Essex and Kent are at critical levels of utilisation.

The A34 leading north from the ports of Southampton and Portsmouth had high levels of offsite parking and a high number of serious and critically utilised lorry parks – although a lot of this is outside the '50km' defined distance from the ports, it is the logical route leading north from the ports.

As an example there is high off-site parking density around the Port of Liverpool and no lorry parking facilities in the immediate vicinity and a number of facilities on routes close to the port are at critical utilisation. Port expansion is likely to make the issue more acute.



Figure 5.7: Map to show the effect of ports on overnight lorry parking

### 5.2.7 Crime

All crime data was collected from NaVCIS, it was recorded across the whole of 2016. NaVCIS identified an issue that not every police force report crime to them, as such there is significant differences in crime statistics from region to region. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worth of further examination.

The key areas of freight crime have been captured in detail in the regional analysis.

The areas found to have the biggest freight crime problems from data and stakeholder interview are:

- Northampton (East Midlands),
- Essex (East of England),
- Leicester (East Midlands) and;
- Nottinghamshire (East Midlands).

This is supported in **Table 5.10** which displays the East Midlands and East of England as having significant crime problems having a total collective stolen value of almost £35Million.

Table 5.10: Regional Crime Summary (2016)

Region	Total Number of Offences	Number of Offences On-site	Number of Offences Off-site	Total Value of Stolen Items	Average Value of Stolen Items
East Midlands	455	162	293	£ 17,850,867	£ 39,232
East of England	389	69	320	£ 16,601,017	£ 42,676
West Midlands	45	6	39	£ 3,166,000	£ 70,356
South East	105	42	63	£ 2,581,210	£ 24,583
North West	19	2	17	£ 831,000	£ 43,737
Yorkshire and Humber	6	2	4	£ 676,700	£ 112,783
London	5	3	2	£ 248,000	£ 49,600
South West	5	1	4	£ 232,200	£ 46,440
England	1,029	287	742	£ 42,186,994	£ 40,998

### 5.2.8 Estimation of additional parking required

We have developed immediate and long term responses which could be used to progress developments in increasing lorry parking capacity. The immediate response is focused on specific lorry parking locations that currently are at critical capacity of over 85%. Whereas the long-term estimations are based on all overnight parking compared with current capacity, this considers a situation where all overnight parking occurs on-site.

#### 5.2.8.1 Immediate response

The following **Table 5.11** has been created to aid initial response decisions, the terminology can be defined as:

- Theoretical : the total number of spaces required if there is an on-site parking space provision for every single lorry counted overnight;
- Practical: the total number of spaces required for every lorry to be able to park in a space overnight considering that a lorry park is, in practice, full at 85% capacity.

To deliver an immediate response, only lorry parks considered as critical ( $\geq$  85%) were considered, as such London is excluded from the table. Theoretically six regions require additional spaces; yet practically eight regions have been identified as needing increased parking facilities, with the most urgent need found to be in the South East

# Table 5.11: Immediate response estimation of additional parking requirements from considering lorry parks currently equal to or above $\ge$ 85% capacity

Region	Theoretical Spaces needed	Practical total spaces needed	Practical number of additional spaces needed	Practical additional spaces needed (%)
East Midlands	-43	866	87	11%
East of England	58	1,848	335	22%
North East	8	153	31	25%
North West	17	351	70	25%
South East	210	1,731	470	37%
North West	-10	472	61	15%
West Midlands	27	1,262	216	21%
Yorkshire and Humber	15	844	142	20%
Total	282	7,526	1,411	19%

#### 5.2.8.2 Long term response

It is useful to examine a long term response to the need for rest areas. The following need to be considered;

- The purpose of lay-bys should be limited to short breaks and emergency stops.
- Overnight parking in industrial estates is inappropriate.
- Thus, the ideal is for all overnight lorry parking to be contained within appropriate onsite facilities.

There is an excess of 3,658 vehicles (24%) when compared to the total number of on-site parking spaces (11,469). Hence, in theory, if there is to be no off-site parking overnight, <u>there</u> is a need for 24% more lorry parking spaces immediately.

In practice it is difficult to fill each lorry park above 85%, as explained in the utilisation categorisation, so on the basis that a 15% excess of spaces are required, <u>there is a real need for 46% more lorry parking spaces.</u>

N.B. This figure, of 46%, factors in the need for 15% more spaces than vehicles needing to park; it has been calculated by dividing total number of vehicles needing to park by a factor of 0.85 (21,965) before dividing this by the current number of on-site spaces.

## 5.3 Regional Findings

### 5.3.1 Introduction

This sub-section provides a regional analysis of the study results. By dividing England into nine regions it aims to inform stakeholders at a more detailed level.

The nine regions considered are:

- East Midlands
- East of England
- London (inside and excluding the M25)
- North East
- North West
- South East
- South West
- West Midlands
- Yorkshire and Humber.

The analysis is structured as follows;.

- **Regional Overview:** A summary of key information such as the on-site utilisation, capacity, percentage of foreign vehicles and crime totals. This is important to provide the context for each region before it is discussed in detail.
- On-Site Parking: This is used to start the process of understanding demand. The on-site utilisation is considered within the region, which is usage as a percentage of total capacity. The key sites with critical demand (>85% utilisation) are identified which indicates that these areas that do not have enough capacity to accommodate on-site parking demand.
- *Off-Site Parking:* This analysis is done in three ways
  - Calculating excess demand presents an overall situation of demand for each local authority in the region, in terms of the total vehicle numbers that needed to park (on and off-site combined) compared to total capacity.
  - Calculating off-site parking density by estimating the total length of SRN within each region this allows us to compare each region fairly by considering scale. The density is therefore the total number of vehicles parked off-site divided by the total length of SRN in kilometres.
  - **Density mapping** GIS allows the user to collate points identifying specific locations with high off-site parking issues.
- **Crime:** This is used to add a further level of comparison to demand issues<sup>25</sup>. The total number of crimes is highlighted in each local authority of the region. A further map is then used to show specific locations of where crime was happening in key areas, to help understand relationships between location of crime and off-site parking.

**Facilities:** A system was devised to rate all on-site lorry parking facilities as described in **Table 5.4**. It provides a useful overview of the types of facilities available to drivers at lorry parks and their respective costs.

<sup>&</sup>lt;sup>25</sup> All crime data sourced from Truckpol 2010

### 5.3.2 East Midlands

#### 5.3.2.1 Regional overview

#### Table 5.12: East Midlands Regional Overview

East Midlands Regional Overview								
	On-site	Laybys	Industrial Estates	Total				
Total Number of Vehicles Parked	1,550	921	561	3,032				
Foreign vehicles (%)	20	24	28	24				
Number of Sites	49	470	115	634				
Utilisation	72%							
Lorry Park Capacity	2,167							
Excess vehicles	(Total Number of vehicles parked – Capacity = Excess)							

The East Midlands has the largest number of vehicles parking offsite (1,264) which amounts to 42% of all parking in the region. The utilisation is 72% which although in the serious criteria is comparatively low when considering other regions with such high off-site parking – this may be due to the large number of distribution centres in the East Midlands that do not provide off-site parking provision for their delivery drivers.

### 5.3.2.2 Critical Utilisation of on-site parking

**Table 5.13** displays the 18 lorry parking sites in the East Midlands which have a Critical Utilisation (Critical: >85% utilisation).

### Table 5.13: Onsite Utilisation

East Midland Sites with Critical Utilisation (>85%)	Utilisation
Welcome Break Leicester Forest East Southbound	102%
BP Kettering Eastbound	100%
BP Kettering Westbound	100%
Junction 23 Lorry Park	100%
Leicester North Services	100%
Portly Ford Cafe	100%
Six Hills Service Station	100%
Spicenick	100%
Super Sausage Cafe	100%
Trussington Services Southbound	100%
Welcome Break Leicester Forest East Northbound	98%
Leicester (Markfield) Services (BP)	96%
Roadchef Watford Gap Services Northbound	91%
Roadchef Watford Gap Services Southbound	89%
Junction 29 Truckstop	89%
Caenby Corner Transport	87%
Moto Donington Park	86%
Shell Thrapston	85%
Regional Average Utilisation	72%

### 5.3.2.3 Off-site parking hotspots



#### Figure 5.8: Off-site parking locations

The East Midlands has severe levels of offsite parking. The region has the highest off-site parking density of 2.7 vehicles/km of SRN, and has the second highest number of excess vehicles in the region. The overall lorry park utilisation, whilst still at a seriously level, is relatively low when compared with other regions with similarly high off-site parking.

Region	Lorry Parks	Industrial Laybys (Laybys and Industrial Estates Estates)				Off-site (Laybys and Industrial Estates)			cles
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimate d distance of SRN (km)	Density (vehicles /km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess
East Midlands	72%	561	921	1,482	550	2.7	3,032	42%	865
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

### Table 5.14: Off-site parking density and excess vehicles

### 5.3.2.4 Crime

The East Midlands was found to have the highest number of freight crimes in the UK when compared with other regions data – this also amounted to the largest total value of goods stolen. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worthy of further examination.

#### Table 5.15: Crime Data

Crime										
	On-site	Off-site		Total						
Total number	293	162		455						
Value (£)			£	17,850,867						

Specific problematic areas found from data collection and stakeholder interview are:

- Northamptonshire,
- Leicestershire,
- Nottinghamshire.

A map has been produced for each of these areas, from the data collected from NaVCIS, to identify key problematic areas.



### Figure 5.9: Freight Crime reported to NaVCIS in Nottinghamshire

The majority of crime reported in Nottinghamshire was found along the A1 with a hotspot at the intersection between the A1 and A46.



#### Figure 5.10: Freight Crime reported to NaVCIS in Northamptonshire

A number of freight crimes reported in Northamptonshire were away from the SRN inbetween the A5 and A14. There are clusters of off-site crimes to the south of the M45, on the A5 and along the A14. There were also a high number of on-site crimes reported along the M1.



### Figure 5.11: Freight Crime reported to NaVCIS in Leicestershire

The majority of freight crime reported in Leicestershire is along the M1 and West of the A50.

### 5.3.2.5 Facilities

### Table 5.16: Regional Summary of On-Site Facilities

Region	Numbe	er of Lorry	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
East Midlands	9%	30%	48%	11%	2%	£13.20
England	8%	20%	51%	16%	5%	£16.60

### 5.3.3 East of England

### 5.3.3.1 Regional overview

# Table 5.17: East of England Regional Overview

	East of England									
Regional Overview										
	On-site	Laybys	Industrial Estates	Total						
Total Number of Vehicles Parked	1,892	855	107	2,854						
Foreign vehicles (%)	26%	27%	30.84%	28%						
Number of Sites	31	559	26	616						
Utilisation	97%		k							
Lorry Park Capacity	1,943		-							
Excess vehicles	(Total Numb	er of vehicles p	parked – Capacity = Excess)	911						

### 5.3.3.2 Critical Utilisation of on-site parking

**Table 5.18** displays the 24 lorry parking sites in the East of England which have a Critical Utilisation (Critical: >85% utilisation). Notably Brampton Hut Services, which is located at the intersection of the A14/A1, has been recorded as having a utilisation of 305%. Through observation it was noted that this particular truck stop had lorries parking along the slip road and on surrounding kerb sides and car parking spaces; every lorry parked in the immediate vicinity of the truck stop was assigned to this service point. Crucially this lorry park is priced at £11 for overnight parking which compares to the regional average of £18.70 yet has extensive features such as: toilets, showers, a petrol station, a security fence and a range of food/drink facilities. This evidences that providing lorry parking facilities which are good value for money and in busy areas is likely to be worthwhile and lead to high utilisation. Very high utilisation leads to issues such as inappropriate parking and safety concerns.

Sites with Critical Utilisation (>85%)	Utilisation
East of England	97%
Brampton Hut Services	305%
Extra Cambridge	132%
Kates Cabin Cafe	120%
Extra Peterborough Services	120%
Extra Baldock Services	118%
Junction 26 Truckstop	110%
Welcome Break Birchanger Green Services	104%
Crawley Crossing (Truckstop café)	103%
BP Baldock	100%
Courtaulds Road now 2010 truck stop	100%
Furnells Transport and Storage	100%
Watling Street Truck Stop	100%
Welcome Break South Mimms Services	100%
Moto Toddington Southbound	98%
Titan Truckstop	97%
Stibbington Diner	97%
BP Connect @ Chelmsford LA Truckstop	96%
Beacon Hill services	93%
Coopers Cabin Truck Stop	93%
Risbys	89%
Moto Thurrock	89%
Tesco fuelling station	88%
Moto Toddington Northbound	86%
Hill Top Cafe	85%

### Table 5.18: Onsite utilisation

### 5.3.3.3 Off-site parking hotspots



#### Figure 5.12: Off-site parking locations

Whilst only 26% of vehicles were counted off-site in the East of England, it has the second largest number of vehicles counted off-site when compared with other regions. The region also has the highest lorry park utilisation of all regions therefore suggesting that additional lorry parks are required here. **Figure 5.12** indicates that the south-east area of the region, namely Essex, has particular issues with off-site parking and all lorry parks have critical levels of utilisation; Essex also has one of the largest freight crime issues in the country.

Region	Lorry Industrial Parks Estates		Laybys	Off-site (Laybys and Industrial Estates)			All Parked Vehicles		
	On-site I utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
East of England	97%	107	855	962	840	1.1	2,854	26%	911
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

### Table 5.19: Off-site parking density and excess vehicles

### 5.3.3.4 Crime

The East of England has the second largest number and value of freight crimes/stolen goods across England, a particular hotspot for crime has been identified as Essex.

#### Table 5.20: Crime Data

Crime									
	On-site	Off-site		Total					
Total number	162	293		455					
Value (£)			£	16,601,017					



#### Figure 5.13: Freight Crime reported to NaVCIS in Essex

The majority of crime reported in Essex was found off-site – there have been a number of incidents reported along the A12. A problematic area can be seen to be on the A13/A130 around the Basildon area.

### 5.3.3.5 Facilities

The East of England has a high percentage (37%) of secure facilities which is denoted by lorry parks in category 4 (security fence) or 5 (CCTV) – this is the highest across England and the average price is higher than the average across England.

### Table 5.21: Regional Summary of On-Site Facilities

Region	Number	Number of Lorry Parks ranked at each level								
Levels of Ranking	1	2	3	4	5	-				
East of England	7%	23%	33%	27%	10%	£18.70				
England	8%	20%	51%	16%	5%	£16.60				

### 5.3.4 London

#### 5.3.4.1 Regional overview

#### Table 5.22: London Regional Overview

London										
Regional Overview										
	On-site	Laybys	Industrial Estates	Total						
Total Number of Vehicles Parked	99	22	15	136						
Foreign vehicles (%)	34%	27%	0.00%	21%						
Number of Sites	5	9	26	40						
Utilisation	48%									
Lorry Park Capacity	207									
Excess vehicles	(Total Numb	er of vehicles p	arked – Capacity = Exces	s) -71						

#### 5.3.4.2 Critical Utilisation of on-site parking

There are no critically classified lorry parks within London (inside the M25) however **Table 5.23** displays the London Gateway Welcome Break site as it is 1% off having a Critical Utilisation (Critical: >85% utilisation) and is the most utilised site within the M25.

#### Table 5.23: Onsite utilisation

Sites with Critical Utilisation (>85%)	Utilisation
London	48%
Welcome Break London Gateway Services	84%

#### 5.3.4.3 Off-site parking hotspots

London was not found to have excessive overnight off-site lorry parking this may be due to a number of reasons:

- A congestion charge is applied to some areas of London if a lorry is to park within these areas overnight the driver may have to pay the congestion charge twice over, meaning some drivers may opt to park outside of these areas.
- The SRN within the M25 is reasonably small, therefore the parking could take place at locations farther than 5km from the SRN which was the boundary set within this study.
- There are fewer distribution centres in London than other areas due to the high land value, meaning less deliveries are likely to occur outside working/daytime hours hence the logical places for lorry drivers to park up for their overnight stop is near their night-time delivery/collection points.

The area between London and the South East coast leading to Dover port can be seen to have an excess of vehicles parking off-site and a high number of critically defined Truckstops.



### Figure 5.14: Off-site parking locations

#### Table 5.24: Off-site parking density and excess vehicles

Region	Lorry	Industrial	Laybys	Off-site			All Pa	rked Vehi	cles
	Parks	Estates		(Layb	ys and Ind Estates)	dustrial			
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
London	48%	15	22	37	360	0.1	136	23%	-71
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

#### 5.3.4.4 Crime

The crime data for London is not complete due to the London Police Force not reporting all crimes to NaVCIS who supplied the crime data; however the crimes that have been reported are of high value averaging at £49,600. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worth of further examination.

#### Table 5.25: Crime Data

Crime							
On-site Off-site Total							
Total number	3	2	5				
Value (£)			£ 248,000				

#### 5.3.4.5 Facilities

London was defined as the boundary within and not including the M25, as such there are only four lorry parks to consider – however none of these have any security features (4/5) and 75% have the basic provisions of Toilets, Showers and a Café.

London has, as expected, got the highest average pricing across all regions – this is due to the high land cost within the M25.

Table 5.20. Regional Summary of On-Sile Facilities	Table 5.26:	Regional	Summary	of On-	Site	Facilities
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Region	Number	of Lorry F	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
London	25%	0%	75%	0%	0%	£21.70
England	8%	20%	51%	16%	5%	£16.60

### 5.3.5 North East

#### 5.3.5.1 Regional overview

#### Table 5.27: North East Regional Overview

North East									
Regional Overview									
	On-site	Laybys	Industrial Estates	Total					
Total Number of Vehicles Parked	244	203	298	745					
Foreign vehicles (%)	15%	16%	19%	17%					
Number of Sites	17	287	108	412					
Utilisation	60%								
Lorry Park Capacity	405								
Excess vehicles	(Total Nun	(Total Number of vehicles parked – Capacity = Excess)							

#### 5.3.5.2 Critical Utilisation of on-site parking

**Table 5.28** displays the 6 lorry parking sites in the North East which have a Critical Utilisation (Critical: >85% utilisation). Two of the sites are recorded as having utilisation over 100% which indicates that a number of lorries were counted parked outside of the designated parking spots, this often includes on the kerb side or straddling car parking spaces.

#### Table 5.28: Onsite utilisation

North East Sites with Critical Utilisation (>85%)	Utilisation
North East	60%
Roadchef Durham Services	117%
Ron Perry (Southbound)	110%
Wentworth Car Park	100%
Purdy Lodge	97%
Moto Washington Southbound	90%
Newton Park Services	86%

### 5.3.5.3 Off-site parking hotspots



#### Figure 5.15: Off-site parking locations

The North east has the highest percentage of vehicles parking off-site across the whole of England which is surprising as the utilisation is relatively low at 60%. The North East also has one of the lowest average overnight parking charges for lorries so it would suggest that there are number of lorry parks which are not located in the busiest road freight areas.

The area indicated in **Figure 5.15** as having high off-site parking surrounds Teesport, and all of the lorry parks within the immediate area of this port are shown as red or yellow indicating critical and serious utilisation respectively. It may be feasible to locate an additional lorry park within this region.

Region	Lorry Parks	Industrial Estates	Laybys	Off-site (Laybys and Industrial Estates)			All Parked Vehicles		cles
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
North East	60%	298	203	501	430	1.2	745	63%	340
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

#### Table 5.29: Off-site parking density and excess vehicles

#### 5.3.5.4 Crime

No crime data was reported to NaVCIS for the North-East. The issue of comprehensive reporting of truck crime is beyond the scope of this report but worthy of examination.

#### 5.3.5.5 Facilities

87% of facilities in the North East do not have any security facilities which are greater than average; however the average price is lower than the average.

#### Table 5.30: Regional Summary of On-Site Facilities

Region	Numbe	r of Lorry	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
North East	6%	19%	63%	13%	0%	£13.50
England	8%	20%	51%	16%	5%	£16.60

### 5.3.6 North West

#### 5.3.6.1 Regional overview

#### Table 5.31: North West Regional Overview

North West								
Regional Overview								
	On-site	Laybys	Industrial Estates	Total				
Total Number of Vehicles Parked	1,397	424	536	2,357				
Foreign vehicles (%)	17%	18%	16%	17%				
Number of Sites	39	357	150	546				
Utilisation	54%							
Lorry Park Capacity	2,573							
Excess vehicles	(Total Numb	er of vehicles p	arked – Capacity = Exces	s) -216				

### 5.3.6.2 Critical Utilisation of on-site parking

**Table 5.32** displays the eight lorry parking sites in the North West which have a Critical Utilisation (Critical: >85% utilisation).

### Table 5.32: Onsite utilisation

North West Sites with Critical Utilisation (>85%)	Utilisation
North West	54%
Welcome Break Charnock Richard Services Southbound	126%
Welcome Break Charnock Richard Services Northbound	125%
Roadchef Chester Services	113%
Moto Birch Services Westbound	113%
Welcome Break Burtonwood Services M62	94%
Let's Eat Cafe	90%
Moto Knutsford Northbound	90%
Moto Lancaster (Northbound)	88%

### 5.3.6.3 Off-site parking hotspots



### Figure 5.16: Off-site parking locations

In the North West a high proportion of vehicles were found off-site (37%), this was the area with the fourth largest number of vehicles parked offsite (960); conversely the onsite utilisation was relatively low at 54%. **Figure 5.16** shows a high off-site parking density around the Port of Liverpool and no lorry parking facilities in the immediate vicinity and a number of those on routes close to the port are at critical utilisation. However further from the port and particularly in the North most of the lorry parks are showing an acceptable level
of utilisation, therefore if a lorry park is to be considered in the North West this should be in the immediate vicinity of the Port of Liverpool.

Region	Lorry Parks	Industrial Estates	Laybys	(Layb	Off-site (Laybys and Industrial Estates)			rked Vehi	cles
On-site utilisation	On-site utilisation	On-site Number of lisation Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
North West	54%	536	424	960	1,130	0.8	2,357	37%	-216
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

Table 5.33: Off-site parking density and excess vehicles

#### 5.3.6.4 Crime

19 crimes were reported to NaVCIS from the North West region – this is the fourth highest crime value across England. The North West has not been identified as one of the four major crime hotspots. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worth of further examination.

#### Table 5.34: Crime Data

Crime										
On-site Off-site Total										
Total number	2	17		19						
Value (£)			£	831,000						

#### 5.3.6.5 Facilities

The North West has the highest percentage of vehicles ranked at level 5 which includes the highest security level of CCTV and comfort level including accommodation. It should be noted that CCTV has been recorded when cameras were seen on the facility however stakeholder engagement has identified that in most cases these cameras do not provide security but just function as parking revenue protection systems using Automatic Number Plate Recognition (ANPR). The North West also has a greater than average number of facilities rated as a 4; this higher percentage of secure facilities may be reflected in the average price being higher than the national average.

Table 5.35: Regiona	I Summary of	<b>On-Site</b>	Facilities
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Region	Numbe	er of Lorry	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
North West	5%	11%	49%	22%	14%	£18.00
England	8%	20%	51%	16%	5%	£16.60

#### 5.3.7 South East

#### 5.3.7.1 Regional overview

#### Table 5.36: South East Regional Overview

South East											
Regional Overview											
	On-site	Laybys	Industrial Estates	Total							
Total Number of Vehicles Parked	2,423	1,065	235	3,723							
Foreign vehicles (%)	42%	38%	42%	41%							
Number of Sites	58	554	128	740							
Utilisation	84%										
Lorry Park Capacity	2,871										
Excess vehicles	(Tota	(Total Number of vehicles parked - Capacity)									

The South East unsurprisingly has the highest percentage of foreign registered vehicles parking overnight (41%) across the whole of England. This reflects the fact that around 88% of all Mainland Europe to UK road freight comes into Kent ports or through the Channel Tunnel.

#### 5.3.7.2 Critical Utilisation of on-site parking

**Table 5.37** overleaf displays the 24 lorry parking sites in South East which have a Critical Utilisation (Critical: >85% utilisation).

19/24 of the critical lorry parks have reached  $\geq$ 100% - observations at site visits found a number of vehicles parked outside of designated parking spaces:

- across car parking spaces
- on kerbs
- on the roads leading up to off-site parking locations.

#### Table 5.37: Onsite utilisation

South East Sites with Critical Utilisation (>85%)	Utilisation
South East	84%
Welcome Break Newport Pagnell Southbound	245%
Extra Beaconsfield	237%
Sutton Scotney Southbound	173%
Roadchef Maidstone Services	168%
Esso Cobham	150%
Airport Cafe	135%
Moto Reading Westbound	120%
Sutton Scotney Northbound	120%
Roadchef Rownhams Services Eastbound	118%
Roadchef Clacket Lane Services Westbound	116%
Welcome Break Oxford Services	114%
Welcome Break Newport Pagnell Northbound	111%
Moto Pease Pottage	108%
Extra Cobham Services	108%
Roadchef Clacket Lane Services Eastbound	104%
Moto Chieveley	102%
Motis Truckstop	100%
Shell TotHills Service Area	100%
Texaco Ower Roundabout services	100%
Moto Reading Eastbound	94%
Crossbush Services	87%
Havant Lorry Park	86%
Liphook Services Southbound	86%
Stop24 Services - Folkestone	85%

#### 5.3.7.3 Off-site parking hotspots



#### Figure 5.17: Off-site parking locations

The largest numbers of vehicles were counted inside the South East and the region also had the second highest number of vehicles found parked off-site.

Onsite utilisation was 84% which is just 1% off being included in the critical level of parking. The hotspots of high off-site parking can be seen clearly on **Figure 5.17** as the A34 corridor leading from Southampton north and the M20 and M2 corridors leading from the Port of Dover towards London. Kent has a particularly high density of off-site parking.

Region	Lorry Parks	Industrial Estates	ndustrial Laybys Estates		Off-site (Laybys and Industrial Estates)			rked Vehi	cles
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
South East	84%	235	1,065	1,300	1,210	1.1	3,723	24%	852
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

#### Table 5.38: Off-site parking density and excess vehicles

#### 5.3.7.4 Crime

The South East has the fourth highest total crime value across the whole of England, with each crime averaging at a value of £24,583. All crime data was collected from NaVCIS, N.B. not all crimes are reported to NaVCIS. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worth of further examination.

#### Table 5.39: Crime Data

Crime										
	On-site	Off-site	Total							
Total number	42	63	105							
Value (£)			£ 2,581,210							

#### 5.3.7.5 Facilities

Only 10% of all on-site parking facilities in the South East have safety features (4/5), surprisingly the average price of lorry parking facilities is higher than the national average.

#### Table 5.40: Regional Summary of On-Site Facilities

Region	Number of Lorry Parks ranked at each level					Average Price (£)
Levels of Ranking	1	2	3	4	5	-
South East	8%	31%	52%	6%	4%	£18.60
England	8%	20%	51%	16%	5%	£16.60

#### 5.3.8 South West

#### 5.3.8.1 Regional overview

#### Table 5.41: South West Regional Overview

South West									
Regional Overview									
	On-site	Laybys	Industrial Estates	Total					
Total Number of Vehicles Parked	783	359	130	1,272					
Foreign vehicles (%)	16%	18%	5.38%	13%					
Number of Sites	37	523	67	627					
Utilisation	72%								
Lorry Park Capacity	1,084								
Excess vehicles (Total Number of vehicles parked - Capacity)									

#### 5.3.8.2 Critical Utilisation of on-site parking

**Table 5.42** displays the eight lorry parking sites in the South West which have a Critical Utilisation (Critical: >85% utilisation).

#### Table 5.42: Onsite utilisation

South West Sites with Critical Utilisation (>85%)	Utilisation
South West	72%
Welcome Break Sedgemoor Services Northbound	129%
Welcome Break Gordano Services	115%
BP Burford Road	100%
Chippenham Pitstop	100%
Esso HGV Stop	94%
Gloucester services southbound	86%
Moto Leigh Delamere Westbound	85%
Roadchef Taunton Deane Services Southbound	85%

#### 5.3.8.3 Off-site parking hotspots



#### Figure 5.18: Off-site parking locations

The South West has on average a serious level of lorry park utilisation (72%) and a hotspot for offsite parking on the M5 corridor leading north from the Bristol Port; however the percentage and numbers of vehicles parked offsite is relatively low in comparison to other regions.

Region	Lorry Parks	Industrial Estates	Laybys	(Layb	Off-site ys and Ine Estates)	dustrial	All Parked Vehicles		
	On-site utilisation	ite Number of tion Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
South West	72%	130	359	489	1,080	0.5	1,272	33%	188
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

#### Table 5.43: Off-site parking density and excess vehicles

#### 5.3.8.4 Crime

The South West was not identified as a crime hotspot. All crime data was gathered from NaVCIS and not all police forces report their crime.

#### Table 5.44: South West Crime Data

Crime							
On-site Off-site Total							
Total number	1	4	5				
Value (£)			£ 232,200				

#### 5.3.8.5 Facilities

27% of facilities in the South West have security features (4/5) which is higher than average however the average price to park overnight is lower than the national average.

#### Table 5.45: Regional Summary of On-Site Facilities

Region	Numbe	r of Lorry	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
South West	8%	16%	49%	24%	3%	£15.50
England	8%	20%	51%	16%	5%	£16.60

#### 5.3.9 West Midlands

#### 5.3.9.1 Regional overview

#### Table 5.46: West Midlands Regional Overview

West Midlands							
		Regional Ove	rview				
	On-site	Laybys	Industrial Estates	Total			
Total Number of Vehicles Parked	1,663	504	352	2,519			
Foreign vehicles (%)	23%	23%	18.47%	22%			
Number of Sites	38	362	86	486			
Utilisation	87%						
Lorry Park Capacity	1,906						
Excess vehicles	(Tota	(Total Number of vehicles parked - Capacity) 613					

#### 5.3.9.2 Critical Utilisation of on-site parking

**Table 5.47** displays the 16 lorry parking sites in the West Midlands which have a Critical Utilisation (Critical: >85% utilisation).

Nine of the lorry parks were at or above 100% capacity which could be explained indicates that a number of lorries were counted parked outside of the designated parking spots, this often includes on the kerb side or straddling car parking spaces.

#### Table 5.47: Onsite utilisation

West Midlands Sites with Critical Utilisation (>85%)	Utilisation
West Midlands	87%
Welcome Break Keele Services Northbound	221%
Welcome Break Telford Services	158%
Welcome Break Warwick Services Northbound	142%
Welcome Break Corley Services Westbound	119%
Welcome Break Warwick Services Southbound	115%
Welcome Break Keele services southbound	107%
Dorton service station	100%
Pitstop Truckstop Bromsgrove	100%
PJs Café and Sudbury Services	100%
Truckers Rest	97%
New Hollies Truckstop	94%
Roadchef Strensham services north	93%
Moto Tamworth	92%
Uttoxeter Services	91%
Stafford Services Southbound	90%
PJM Lorry Park	88%

#### 5.3.9.3 Off-site parking hotspots



Figure 5.19: Off-site parking hotspots

The West Midlands has a high on-site utilisation and a high number of excess vehicles, offsite parking can be seen in **Figure 5.19**, to be predominantly centred on the M6 and A5.

Region	Lorry Parks	Industrial Estates	Laybys	Off-site (Laybys and Industrial Estates)		All Pa	rked Vehi	cles	
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
West Midlands	87%	352	504	856	700	1.2	2,519	29%	613
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

#### Table 5.48:Off-site parking density and excess vehicles

#### 5.3.9.4 Crime

The West Midlands had the third highest number of items reported as stolen which also equated to the third highest value. However, not all crime data is reported to NaVCIS. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worth of further examination.

#### Table 5.49: Crime Data

Crime							
On-site Off-site Total							
Total number	6	39	45				
Value (£)		<u>.</u>	£ 3,166,000				

#### 5.3.9.5 Facilities

29% of facilities in the West Midlands had security features which are higher than the national average, yet the average price was lower than the average across England.

#### Table 5.50: Regional Summary of On-Site Facilities

Region	Numbe	er of Lorry	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
West Midlands	8%	16%	47%	21%	8%	£16.30
England	8%	20%	51%	16%	5%	£16.60

#### 5.3.10 Yorkshire and Humber

#### 5.3.10.1 Regional overview

#### Table 5.51: Yorkshire and Humber Regional Overview

Yorkshire and Humber							
Regional Overview							
	On-site	Laybys	Industrial Estates	Total			
Total Number of Vehicles Parked	1,418	356	258	2,032			
Foreign vehicles (%)	19%	14%	11.63%	15%			
Number of Sites	37	276	95	408			
Utilisation	76%	•					
Lorry Park Capacity	1,856						
Excess vehicles (Total Number of vehicles parked - Capacity)							

#### 5.3.10.2 Critical Utilisation of on-site parking

**Table 5.52** displays the nine lorry parking sites in Yorkshire and Humber which have a critical utilisation (Critical: >85% utilisation).

#### Table 5.52: Onsite utilisation

Yorkshire and Humber Sites with Critical Utilisation (>85%)	Utilisation
Yorkshire and Humber	76%
Welcome Break Woodall Services Northbound	179%
Moto Ferrybridge Services	117%
Exelby Services Ltd - Coneygarth	109%
The Stockyard Truckstop	98%
Shell Beacon	92%
Ulceby Truckstop	91%
Junction 31 Secure Parking	88%
Welcome Break Woodall Services Southbound	88%
Glews Truck Stop	87%

#### 5.3.10.3 Off-site parking hotspots



#### Figure 5.20: Off-site parking locations

Yorkshire and Humber has relatively low numbers of vehicles parked off-site but there is a high density of offsite parking surrounding the ports and around the A1. Utilisation of lorry parks is at serious levels (76%).

Region	Lorry	Industrial	I Laybys Off-site All Parked Ve		Off-site		rked Vehi	cles	
	Parks	Estates		(Laybys and Industrial Estates)					
	On-site utilisation	Number of Vehicles Parked	Number of Vehicles Parked	Number of Vehicles Parked	Estimated distance of SRN (km)	Density - vehicles/km of SRN)	Number of Vehicles Parked	Percentage parked off- site	Excess vehicles
Yorkshire and Humber	76%	258	356	614	780	0.8	2,032	28%	179
England	76%	2,492	4,709	7,201	7,080	1	18,670	39%	3,658

Table 5.53: Off-site parkin	ng density and excess ve	hicles
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#### 5.3.10.4 Crime

Yorkshire and Humber was not identified as having particular issues with crime as only six incidents of crime were reported to NaVCIS. The issue of comprehensive reporting of truck crime is beyond the scope of this report but is worth of further examination.

#### Table 5.54: Crime Data

Crime						
On-site Off-site Total						
Total number	2	4	6			
Value (£)			£ 676,700			

#### 5.3.10.5 Facilities

The price of parking in Yorkshire and Humber is on average higher than the national average. A high majority of lorry parks are ranked at level 3 meaning they have basic facilities such as toilets, showers and a café – only 15% of lorry parks have security features (4/5).

#### Table 5.55: Regional Summary of On-Site Facilities

Region	Numbe	er of Lorry	Average Price (£)			
Levels of Ranking	1	2	3	4	5	-
Yorkshire and Humber	6%	6%	73%	12%	3%	£17.20
England	8%	20%	51%	16%	5%	£16.60

# 6. Summary Findings

### 6.1 Introduction

Lorry parking locations were surveyed within 5km of the Strategic Road Network (SRN) in England in March 2017. Desk based analysis identified all lorry parking locations within the 5km, this was then used to plan routes for all audit teams; to be clear every road in the SRN was surveyed as well as all routes leading to off-site parking locations and industrial estates. The aim of the study was to assess capacity and demand for overnight lorry parking; as such the physical "site visits" were conducted mid-week (Tuesday-Thursday) after 6pm. Data was recorded using a web based mobile application system, and a summary of findings is listed below. A broadly similar audit exercise was done in 2010.

- During the month long survey, 18,670 vehicles were counted parked overnight across England in off-site and on-site locations. Each site was counted for a single weekday night.
- The total capacity of on-site spaces available in lorry parks or motorway service areas (MSAs) was found to be 15,012.
- Therefore, when compared with the total number of vehicles counted, there was an excess of 3,658 vehicles that could not be parked even if every parking space could be filled.
- 311 on-site lorry parking facilities were surveyed across England, lorry parking facilities include:
  - Motorway service areas (MSAs) with overnight lorry parking options
  - o Independently owned/managed truck stops
  - o Trunk road service areas
  - Local authority truck park
- In addition to this 801 Industrial / Retail Estates and 3,397 Laybys were surveyed.
- Regions with ≥70% utilisation of lorry parks include:
  - East of England 97%
  - West Midlands 87%
  - South East 84%
  - Yorkshire and Humber 76%
  - East Midlands 72%
  - South West 72%
- 39% of all vehicles recorded were parked off-site in laybys or Industrial Estates.

**Figure 6.1** shows the locations of all truck stops, laybys and industrial estates that were visited can be seen below. As expected the laybys display a structure following the strategic road network, and most industrial estates and lorry parks are close by.



Figure 6.1: Locations of all truck stops, laybys and industrial estates surveyed

## 6.2 Results

The study recorded 311 sites across England allowing overnight parking. These sites had a total capacity of 15,012 parking spaces. The on-site utilisation of these sites varied across regions, from 48% to 97%, with the national average being 76%.

**Table 6.1** and **Figure 6.2** breakdown the number of vehicles parked in lorry parks, industrial estates and lay-bys. The total capacity of on-site lorry parking facilities in each region is also presented allowing utilisation to be assessed.

Region	Lorry Park		Parked v	Total Parked	Excess Vehicles		
	Capacity	On- site	On site utilisation	Industrial estates	Lay- bys	Venicies	
East Midlands	2,167	1,550	72%	561	703	3,032	865
East of England	1,943	1,892	97%	107	624	2,854	911
London	207	99	48%	15	16	136	-71
North East	405	244	60%	298	170	745	340
North West	2,573	1,397	54%	536	347	2,357	-216
South East	2,871	2,423	84%	235	655	3,723	852
South West	1,084	783	72%	130	294	1,272	188
West Midlands	1,906	1,663	87%	352	388	2,519	613
Yorkshire and Humber	1,856	1,418	76%	258	305	2,032	176
England	15,012	11,469	76%	2,492	4,709	18,670	3,658

#### Table 6.1- National overview of result



#### Figure 6.2: Number of vehicles parked by region and parking type

Two thirds of all regions have high lorry parking utilisation (above 70%) and five out of nine regions have parking which exceeds or is close to exceeding capacity as seen in **Figure 6.2** – this indicates that there is insufficient capacity to meet demand in many places.

**Figure 6.2** also shows that the East Midlands, East of England and North East had more vehicles parking than there was space, additionally the South East and West Midland regions are also close to exceeding capacity. This survey was conducted in a representative month, March. However there are seasonal fluctuations in some types of freight goods transport traffic that mean it is possible that these regions could be over capacity during busy times of the year.

There is evidence to suggest that some drivers choose to park off-site in lay-bys or industrial estates even when spaces are available on-site – for example the North East has a lower capacity than total trucks parked yet overall utilisation is only 60%.

# 6.3 Comparison against previous study

The data collected in 2017 has been compared to the data collected from the previous lorry parking study in 2010. Comparisons of the two years are shown in **Table 6.2** below.

There has been an increase in the number of observed lorry parks by 11% which equates to 14% more spaces. On average each lorry park has a capacity of 48 vehicles and the lorry parking facilities that have been added since 2010 have an average of 59 spaces per site.

	2010 Data	2017 Data	Difference
Vehicles parked overnight	13,708	18,670	4,962 (14% increase)
On-site spaces	13,173	15,012	1,839 (14% increase)
Number of lorry parks surveyed	280	311	31 (11% increase)
Regions with greater than 70% utilisation	South East West Midlands East of England	East of England 97% West Midlands 87% South East 84% Yorkshire and Humber 76% East Midlands 72% South West 72%	A greater number of regions have high utilisation as Yorkshire and Humber, the East Midlands & South West now also have utilisation over 70%
% of vehicles parking off-site	41	39	2

#### Table 6.2:Comparison of data from 2010 to 2017

Pagion	Lorry Park Utilisation				
Region	2010	2017			
East of England	80%	97%			
West Midlands	71%	87%			
South East	71%	84%			
Yorkshire and Humber	47%	76%			
East Midlands	56%	72%			
South West	46%	72%			
North East	50%	60%			
North West	55%	54%			
London	45%	48%			
England	58%	76%			

#### Table 6.3: Regions ordered in order of highest utilisation

**Table 6.3** displays the utilisation of each region in descending order from the 2017 figures. There are noticeable trends across the regional data with most utilisations having increased since the previous study, and the areas with the highest utilisation remaining the same (East of England, West Midlands and South East). The utilisation in Yorkshire and Humber has increased the most since the previous study in 2010.

The data shows a low utilisation and low number of offsite parking in London. There are a number of reasons this may be so, a very small proportion of the road network in London is classed as part of the SRN and there may be industrial estates further than 5km from this network that were not captured. Additionally congestion charges in London may deter drivers from spending the night within the M25 as they may be charged for both days.

### 6.4 UK vs. Foreign Vehicles

Lorry Parks and MSA's	UK vehicles	Foreign vehicles	All Vehicles	Foreign / Total (%)	
South East	1,412	1,011	2,423	42%	
London	65	34	99	34%	
East of England	1,380	442	1,822	26%	
West Midlands	1,280	383	1,663	23%	
East Midlands	1,236	314	1,550	20%	
Yorkshire and Humber	1,145	273	1,418	19%	
North West	1,155	242	1,397	17%	
South West	657	126	783	16%	
North East	207	37	244	15%	
England	8,537	2,862	11,399	23%	

#### Table 6.4: UK to Foreign vehicle comparison for Lorry Parks and MSAs

Offsite Parking	UK vehicles	Foreign vehicles	All Vehicles	Foreign / Total
South East	791	509	1,300	39%
East of England	698	264	962	27%
East Midlands	1,105	377	1,482	25%
West Midlands	675	181	856	21%
North East	412	89	501	18%
North West	796	164	960	17%
London	31	6	37	16%
South West	417	72	489	15%
Yorkshire and Humber	533	81	614	13%
England	5,458	1,743	7,201	24%

#### Table 6.5: UK to Foreign vehicle comparison for layby's and industrial estates

 Across England 25% of vehicles counted taking overnight stops were foreign registered in contrast to the 3.3%<sup>26</sup> of total UK HGV vehicle kilometres that is made up of foreign vehicles.

- This confirms that a number of journeys made by UK vehicles can be completed within the day and do not require an overnight stop.
- The percentage of foreign vehicles parked on-site is 1% lower than those parked offsite.
- In both cases on and off-site parking has the highest proportion of foreign vehicles in the South East. As the majority of international road movements move across the Dover Straits and Channel Tunnel, this is an expected outcome.
- London has a notable difference between the numbers of foreign vehicles found on and off-site, one of many reasons may be concern over congestion charging.

#### 6.5 Facilities

A system was devised to rate all on-site lorry parking facilities as described in the **Table 6.6** below. This rating was based on a five point scale which is broadly in line with LABEL the European Truck Park Area Certification system. As the system devised does not include all of the LABEL criteria, the results should be used indicatively. Nevertheless, it provides a useful overview of the types of facilities available at lorry parks on a regional basis.

<sup>&</sup>lt;sup>26</sup> Department for Transport, 2015 - Road Traffic Estimates: Great Britain 2014 (R)

Table	6.6:	Lorry	Park	rating	basis
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Truck Stop Rating	Truck Stop Facilities	Description
1	Toilets	Basic rest area offering truck drivers a place to park and access to toilets.
2	Toilets & Café	Basic/medium rest area offering truck drivers a place to park and access basic amenities, including toilets and a cafe.
3	Toilets, Shower & Café	Medium level facility that offers truck drivers a place to park with shower facilities as well as toilets and a cafe.
4	Toilets, Lighting, Shower, Café, & Security Fence	Medium/High level facility that offers a degree of secure and safe truck parking whilst also offering a decent level of facilities for truck drivers.
5	Toilets, Lighting, Shower, Café, Security Fence Accommodation & CCTV	High end truck parking facility offering truck drivers a place to park securely and safely whilst also enjoying extensive facilities.



Figure 6.3: Lorry park ratings by regions

The North West and East of England have the highest proportion of highly rated parks, meaning these have the most facilities including security features – closely followed by the West Midlands.

The majority of lorry parks have a rating of three which denotes good amenities but no security features.



## 6.6 Other Observations

#### Figure 6.4: Proportion of MSAs compared to other parking facilities

**Figure 6.4** shows how the split of MSA facilities versus other off-site parking facilities varies across the regions.

London covers the area inside M25 and has a small number of kilometres of SRN but it does have the highest proportion of MSAs compared to other parking areas.

East Midlands, East of England, North East and Yorkshire and Humber all have low proportions of MSAs (under 30%). This is due to the SRN in those regions being predominately made up of A roads.

Row Labels	Average Overnight Parking Charge for a lorry.
London	£ 21.70
East of England	£ 18.70
South East	£ 18.60
North West	£ 18.00
Yorkshire and Humber	£ 17.20
West Midlands	£ 16.30
South West	£ 15.50
North East	£ 13.50
East Midlands	£ 13.20
England	£ 16.60

Table 6.7: Average	overnight	parking	charge f	or a	lorry par	k regionally
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Not surprisingly average parking charges are highest in London, the South East and the East of England; the North East and East Midlands have the lowest average parking charges.

# 6.7 Estimation of additional parking required

#### 6.7.1 Utilisation Categorisation

A system has been used to categorise lorry park utilisation – see **Table 6.8**.

As with previous studies we have taken 70% full as reaching an increasingly serious level where drivers have to search carefully for spaces. At 85% utilisation or more it becomes difficult for drivers to find parking spaces due to the sizes of vehicles and the way they are positioned. So in practice some drivers may interpret a lorry park which is 85% utilised as being full.

#### Table 6.8: Utilisation Categorisation

Description	Utilisation (%)
Critical	≥ 85
Serious	70-84
Acceptable	<69

#### 6.7.2 Immediate response

**Table 6.9** has been created to aid initial response decisions, the terminology can be defined as:

- Theoretical : the total number of spaces required if there is an on-site parking space provision for every single lorry counted overnight;
- Practical: the total number of spaces required for every lorry to be able to park in a space overnight considering that a lorry park is, in practice, full at 85% capacity.

To deliver an immediate response, only lorry parks considered as critical ( $\geq$  85%) were considered, as such London is excluded from the table. Theoretically six regions require additional spaces; yet practically eight regions have been identified as needing increased parking facilities, with the most urgent need found to be in the South East.

# Table 6.9: Immediate response estimation of additional parking requirements from considering lorry parks currently equal to or above $\ge$ 85% capacity

Region	Theoretical Spaces needed	Practical total spaces needed	Practical number of additional spaces needed	Practical additional spaces needed (%)
South East	210	1,731	470	37%
North East	8	153	31	25%
South West	17	351	70	25%
East of England	58	1,848	335	22%
West Midlands	27	1,262	216	21%
Yorkshire and Humber	15	844	142	20%
North West	-10	472	61	15%
East Midlands	-43	866	87	11%
Total	282	7,526	1,411	19%

#### 6.8 Summary

- This study concentrated on parking within 5kms of the SRN.
- The lorry parking situation has got more acute since the previous study in 2010.
- During a typical mid-week night there are 18,670 vehicles parked overnight across England in off-site and on-site locations.
- This is a 36% increase (4,962) since 2010. Part of the reason for this is that in 2010 the UK was in a recession and there were fewer HGVs on the road.
- In comparison, the total capacity of on-site spaces available in lorry parks or motorway service areas (MSAs) was found to be 15,012. This is an increase of just 14%.
- Six out of nine English regions have reached serious levels of utilisation (>70%). The average for the whole country is 76%.
- Taking just the critical areas >85% utilisation, there is an immediate need for 1,411 more spaces across the country (19%), with the most urgent need found to be in the South East where 37% more overnight parking spaces are required.
- The highest number of vehicles spotted was in the South East (3,723). 41% of these were foreign registered. This was followed by the East Midlands (3,032).
- 25% (4,605) of the vehicles parked overnight are foreign registered. This relates to foreign vehicles making up just 3.3% of HGVs on the roads.
- The highest concentration of UK vehicles was found in the East Midlands 77% (2,341).
- The average price for overnight parking in England is £16.60. Based on this figure the annual cost of paying for overnight parking in on-site facilities is approximately £3,187.
- 39% of vehicles were found to be parking off-site (e.g. in laybys and industrial / retail parks).
- In terms of the total number of vehicles parked off-site, the East Midlands was top with 1,264 followed by the South East with 890.
- The North East had the greatest percentage of vehicles parked off-site however (63%) followed by the East Midlands (42%).
- Freight crime is estimated to cost EU member states €11.6 billion each year.
- Just 21% of lorry parking facilities across England provide security features.

# Glossary

Term(s)	Definition
Capacity	The total number of vehicles that could park in a lorry park.
Facilities	What is provided by lorry parks and includes services and security.
Heavy Goods Vehicle (HGV)	A heavy goods vehicle is the European Union (EU) term for any truck with a gross vehicle weight of over 3.5 tonnes
Local Authority Parking	A lorry park which is operated by a local council, generally these are council car parks which allow overnight lorry parking.
Motorway Rest Area (MSA):	A lorry park which is signed from the motorway and provides at least 2 hours free parking, free toilets, fuel and are open 24 hours a day.
Motorway Rest Area (MRA):	A lorry park which is signed from a motorway but does not meet all the requirements to be a motorway service area.
Strategic Road Network (SRN)	The road network maintained and operated by the Highways England (HE). It includes all motorways and major trunk roads. The vast majority of long distance trips take place on the SRN.
Utilisation	How busy the lorry park is as a percentage of number of vehicles parked compared to the capacity.

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# Written statement to Parliament Road haulage update, 21 May 2018

Outlines work being done to improve on the current Operation Stack arrangements and measures being taken to tackle fly-parking.

Published 21 May 2018

From: Department for Transport and Jesse Norman MP

#### Delivered on: 21 May 2018

The Department for Transport is today (21 May 2018) updating the house on our <u>work to improve on the current Operation Stack</u> <u>arrangements</u> and ensure that traffic can keep flowing on the M20 even in the event of serious disruption to cross-Channel transport.

At the same time, we are announcing a package of measures to tackle the blight of fly-parking across the south-east and other parts of the country, including plans to increase overnight lorry parking capacity which could potentially add an additional 1,500 spaces.

Further to the Secretary of State's statement of 15 November 2017, Highways England will soon be starting the consultation process on a permanent solution for holding lorries in the event of cross-Channel disruption, with a full public information exercise launching in June. The consultation will consider the broad solutions rather than specific sites. It will also seek views on the potential use of any future lorry park or parks for 'business as usual' overnight lorry parking; while remaining sensitive to the government's desire not to deter any planned private investment.

In his November announcement, the Secretary of State also asked Highways England to develop an <u>improved interim arrangement for</u> <u>holding lorries on the M20</u>, whilst allowing traffic to continue to flow in both directions and keeping junctions open. The department has now agreed with Highways England that this arrangement should take the form of a contraflow system which would see lorries for the Port of Dover and Eurotunnel held on the coast-bound carriageway between junctions 8 and 9 of the M20, while other traffic will use a contraflow to continue their journey on the other side of the motorway. Highways England are starting the preparatory works for the scheme now and it will be available from early 2019.

As well as improving the contingency arrangements as to lorry parking, the government is also focused on improving the situation for business-as-usual lorry parking. We have published the results of an in-depth survey carried out on the <u>national picture of overnight lorry parking in England</u>.

The detailed information in the report will help local planning authorities to understand the nature of the issue better, at both a regional and local level. However, it is important to note that developers are already responding to what is currently a mismatch between supply and demand.

There are planning applications in the pipeline which it is estimated would, if delivered, equate to over 1,000 additional spaces across the country.

Given the evident need for further parking spaces, the government will be taking 3 steps on its side:

First, Highways England have begun to analyse their landholdings in order to identify sites with the potential to be developed into lorry parks. Initial work suggests that this might facilitate a total of around 1,500 additional parking spaces nationwide. Detailed feasibility work will be undertaken in the next 6 months.

More generally, Highways England intend in future to give increased priority to the provision of lorry parking across the strategic road network. Its <u>initial report for the second Road Investment Strategy</u> <u>period (2020 to 2025)</u> Highways England propose funding to support the provision of better roadside facilities, which would include lorry parking. The department has <u>consulted on this proposal</u> and is carefully considering the responses received.

Secondly, I have written with Planning Minister Dominic Raab to local planning authorities to draw their attention to the survey results, which show a strategic national need for more lorry parking and highlight shortages in specific areas. In addition, I am asking Highways England to develop their existing role as a statutory consultee on all proposed developments that are on or that directly affect the strategic road network. In future, Highways England will seek to use their unique network-wide perspective to assist local authorities in actively identifying areas of lorry parking need and potential solutions, including in the context of specific planning applications where these might help alleviate the situation.

Thirdly, the department will consider further steps to make it easier for local authorities to take enforcement action against hauliers who park inappropriately. In Kent the trial on a stretch of the A20 of innovative enforcement approaches has had considerable success in its first 6 months of operation, with a significant fall in the number of vehicles parked overnight, and increased use of commercial parking facilities in the area, especially at weekends. Subject to the findings of this 18-month trial, we will be looking to promote the wider application of such measures elsewhere.

Published 21 May 2018

Ministry of Housing, Communities & Local Government

Department for Transport Dominic Raab MP Minister of State for Housing and Planning

Ministry of Housing, Communities & Local Government

Jesse Norman MP Parliamentary Under Secretary of State

Department for Transport

18 May 2018

Dear Chief Planning Officer,

In the context of your authority's land use planning functions, we are writing to draw your attention to the continuing shortage of overnight lorry parking facilities.

Last year, the Government commissioned an in-depth nationwide study of this issue. The study confirms that the shortage has grown more acute in certain areas of the country since the last such study was undertaken in 2010, with an estimated need for 1,400 more spaces across the country.

The road haulage sector is dependent on sufficient facilities for drivers being available and in the right locations, to enable drivers to take their regular statutory breaks. Capacity constraints at formal lorry parking facilities frequently translate into problematic 'fly-parking', for example in laybys and industrial estates which lack proper facilities.

A related issue concerns on-road daytime lorry parking in the vicinity of some distribution centres. Modern warehouses tend to have a higher stock turnover than has historically been the case and given the just-in-time nature of modern logistics, at many distribution centres there is insufficient on-site parking to cater for these traffic volumes. We would like to take this opportunity to draw your attention to the need for developers of new or

expanded distribution centres to take ample account of current and future parking needs, to avoid displacement parking in the surrounding area.

The National Planning Policy Framework (NPPF) includes policies to support a vibrant economy, promote sustainable transport and facilitate the provision of transport infrastructure. This was reflected in the draft NPPF, on which we have recently consulted.

We have today published the full National Survey of Lorry Parking report.<sup>1</sup> It is hoped that the report will be a useful resource for local planning authorities and create a better understanding of the issue, in both a local and a national context. Annexed to this letter is a map showing the geographic distribution of the fly-parking 'hotspots' and lorry parking utilisation levels. The Department for Transport will also make available the underlying survey data on request.

#### DOMINIC RAAB

JESSE NORMAN

<sup>&</sup>lt;sup>1</sup> https://www.gov.uk/government/publications/national-survey-of-lorry-parking

# Annex – off-site parking density and truck stop utilisation levels

# as introduced with AECCAILS (\*ECCAF) to fielere we was added- ren AECOV white The document of out these or we restore as the N LEGEND STUDY AREA PORT LOCATION North East STRATEGIC ROAD NETWORK TRUCK STOP UT LISATION CRITICAL (>85%) Steesp SERIOUS (70 54 %) ACCEPTABLE (+89%) OFFSITE DENSITY. liigh Low Yorkshire and the Humber East Midlands West Midlands East of England Felixstowe ondon Gateway Londe South West South E

#### **Off-Site Parking Map**







# Lorry Parking Demand Assessment

Highways England

20 June 2019

### Quality information

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# **Executive Summary**

Throughout the course of this study, identifying which areas of England are in the greatest need of additional lorry parking provision has been assessed using three different methods. Firstly, the 2017 DfT 'snap shot' survey was analysed at a more granular level than any previous work, which included data relating to existing lorry park utilisation (for those lorry parks located on the SRN) as well as off-site parking in laybys and industrial estates. A more practical assessment of lorry parking issues was then undertaken through a survey of Highways England Traffic Officers which highlighted recurring issues on parts of the road network. This section was also complemented with information gathered through consultation with various stakeholders including hauliers, lorry park facility providers, trade bodies and fuel providers. The third method to assess lorry parking demand was to analyse port related freight movements and conduct a high level theoretical analysis into the demand for lorry parking that port related freight movements generate. The full methodology for this assessment is outlined in Chapter 4.

Each of the three methodologies highlighted a number of the same geographical areas to have significant demand for additional supply of rest areas including:

- South East England, specifically the county of Kent
- the Midlands, in the regions of Leicester, Coventry, Milton Keynes and everywhere in between
- the M5 between Bristol and Birmingham
- Liverpool and Manchester regions
- logistics precincts in Sheffield/Rotherham and Leeds
- the A1(M) through Durham to Newcastle
- Central London.

The regions are highlighted in the figure below which has the combined findings from all three methodologies at a local authority level. The lighter shade of orange represents local authorities that were identified as requiring additional lorry parking in one of the methodologies while the brightest shade of orange represents those local authorities that were identified by all three of the methodologies to require additional lorry parking supply. A list of which local authorities were raised in each methodology can be found in Appendix B.

As part of the study, some additional issues relating to the supply of lorry parking were identified and discussed. The key issues that need to be addressed in order to increase the supply of lorry parking and reduce off-site parking include:

- 1. Recognising the segmentation of lorry parking demand demand for lorry parking may vary between types of lorry parking provision including:
  - 'High Quality' any lorry park with the presence of toilets, showers, a café, accommodation and security
  - Middle of the range usually some combination of amenities and costs more than £5
  - 'Cheap & Cheerful' any lorry park costing less than £5 for an overnight stay.
- 2. Ensuring key lorry parking success factors are met the factors that should remain consistent across all lorry parks include being in close proximity to the SRN and provision of some level of security.
- 3. Removing barriers to lorry parking development from the private sector to promote private sector investment and reduce the time and difficulty associated with providing lorry parking.
- 4. **Promoting technology** as a means to provide real time information such as location and availability of lorry parking facilities and promote collaboration between lorry parks and major freight generators and attractors (i.e. ports and industrial estates).



Figure 1 Summary of local authorities in need of additional lorry parking supply

# **1. Introduction**

## Background

Highways England were asked by the Department for Transport (DfT) to consider lorry parking and assess where there are areas of high demand and lack of provision. It is recognised that having sufficient lorry parking and rest areas within close proximity to the Strategic Road Network (assumed to be 5kms) helps Highways England meet three imperatives: Safety / Customer Service / Delivery.

The DfT in March 2017 used AECOM's Freight Team to do a full audit of utilisation of over 4,000 parking areas including official lorry parks, Motorway Service Areas and industrial estates and laybys. This found that there is an increasing need for overnight lorry parking and that there is a shortfall in provision in six regions of England. Although some heat maps based on utilisation were produced as part of the research, there is a need to be more specific such as identifying locations with high demand but no existing supply (which cannot be identified from utilisation heat maps alone).

## **Purpose of this study**

The focus for this work is to do a qualitative and quantitative analysis of driver patterns of behaviour on key freight corridors to narrow down the most likely areas of demand for lorry parking. It considers strategic spatial geography to focus on parts of the country where demand for parking spaces is greatest and supply of these spaces is weakest; this provides a honed view as to locations most likely to support viable new or potentially enlarged lorry parks. This in turn will allow Highways England to focus its input to the Local Authority Development Plan process and help to achieve its requirement to provide facilities for freight users.

In addition to providing guidance on the most likely areas of demand for lorry parking based on all the available evidence, consideration has been given to locations most likely to make successful lorry parks. The approach of the work has been broken down using a 3-stage approach, and features in the following chapters;

- 2. Existing supply and demand this draws directly from the 2017 DfT national survey
- **3. Stakeholder-led demand analysis** this included consultation with hauliers, trade bodies, lorry parking facility providers and governmental organisations to identify problematic areas and confirm drivers of lorry parking demand. Highways England Traffic Officers were also surveyed which is discussed in this section.
- **4. Port driven demand and theoretical analysis** this was informed by port statistics for inbound and outbound freight as well as driving time regulations which were confirmed during the stakeholder consultation.

A short summary of the recent publication by the European Commission titled a 'Study on Safe and Secure Parking for Trucks' has also be completed and is detailed in Section 5 before a summary of the entire report and discussion around next steps and recommendations in Section 6.

# 2. Existing supply and demand

## Methodology

This assessment is mainly comprised of reviewing and analysing the DfT's 2017 National Survey data of overnight lorry parking in England and to provide information on local areas with high demand and low supply for lorry parking. This will require analysis of the existing database which includes usage of lorry parks, Motorway Service Areas, laybys and retail/industrial sites. During the survey, there were 311 lorry parks (on site), 801 Industrial / Retail Estates (off-site) and 3,397 laybys (off-site) visited as shown in Figure 2-1. The locations where vehicles were parked are colour coded by type.

The utilisation surveys were undertaken during the evenings between the hours of 6pm and 2am on Tuesdays, Wednesday and Thursdays throughout the month of March 2017. There was a team assigned to each of the nine regions and each team consisted of two team members. All of the truck stops, industrial estates and laybys were visited in England within 5km of the SRN.

Data on the lorry parking sites was collected using a mobile application 'Collector for ArcGIS'. This is a cloud based mapping platform designed by Esri. This 'App' allowed audit teams to digitally record site visit observations using a mobile phone, tablet or iPad. The information collected included data on whether vehicles were UK or foreign registered in order to gain an understanding of international transit movements.



Figure 2-1 All locations visited

## Lorry parking supply and demand

The utilisation of on-site lorry parking facilities compares the number of vehicles parked against current capacity which is a useful indicator for areas where additional provision of lorry parking is likely to be utilised.

A categorisation system has been created in the previous DfT demand study as shown in Table 2-1 to identify when high utilisation becomes problematic. It is recognised that at 85 percent utilisation or more it is difficult for drivers to find parking spaces due to the size of vehicles and the way they are positioned, hence at this point the Lorry Park is considered to be full in a practical sense.

#### **Table 2-1 Lorry Park Categorisation**

Description	Utilisation (%)	
Critical	≥ 85.00	
Serious	70.00 - 85.00	
Acceptable	< 70.00	

This section aims to identify areas with highly utilised lorry parks (i.e. lorry parks with above 85% utilisation). As can be seen in Figure 2-2, 112 out of 311 lorry parks (on-site) surveyed are identified as critically utilised lorry parks with utilisation above 85 percent. The critical lorry parks tend to be on major freight arteries such as the M1, M3, M4, M5, M6, M11, M18, M20, M25, M27, M40, M56, M62 and M180. Additionally, the following A-roads also contain a number of critically utilised lorry parks; A1, A3, A5, A12, A14, A20, A23, A27, A30, A34, A38, A46, A50 and A417. It is also worth noting that an acceptable utilised (green dot on the map) does not represent an underutilised or unsuccessful lorry park but merely suggests that at the time of the survey a lorry driver looking to park at this facility would not be turned away. For example, a lorry park in Ashford (South-East England in close proximity to Dover) was recorded at under 70 percent uilised at the time of the survey however during discussions with the owner of the lorry parking facility it was suggested that upto 150 lorries were turned away per night of a regular basis.

To be more specific, as shown in Table 2-2, East of England and South East reigions have the highest number of critical lorry parks (24 and 23 followed by East Midlands with 18 critical lorry parks). Further analysis on lorry park utilisation is carried out on a more detailed level to identify counties and metropolitan areas with high demand for existing lorry parks. Table 2-2 shows counties and metropolitan areas within which all existing lorry parks are critically utilised. Only areas with at least two existing lorry parking facilities have been included. Generally, regions that have the greatest number of critically utilised lorry parks also include the most counties and metropolitan areas within which all lorry parks also include the most counties and metropolitan areas within which all lorry parks are critically utilised. Four areas in the East of England have all lorry parks critically utilised while Leicestershire has the highest number of critical lorry parks in the East Midlands.

It is worth noting that the data presented in the table below does not necessarily indicate the areas in which demand for lorry parking is the greatest, but rather where there is the greatest potential for unmet demand. Additionally, the existence of one lorry park surveyed at below critical utilisation (below 85%) would have excluded the area from Table 2-2 however demand for lorry parking in this area may still be very high (i.e. for a different location or different set of facilities such as increased security). For example, the county of Kent contains four critically utilised lorry parks as well as a further five seriously utilised (above 70%), however it also contains five lorry parks at an acceptable utilisation on the day of the survey (below 70%), thus is not including in Table 2-2. There are a number of similarly located lorry parks which incur varying levels of utilisation which demonstrate driver's preferences for security, showering facilities and areas for socialising. These factors are discussed in the next section.

#### Table 2-2 Critically utilised lorry parks

Region	Total lorry parks	Critically utilised lorry parks	Percentage
East of England	31	24	77%
- Cambridgeshire	5	5	
- Essex	4	4	
- Central Bedfordshire	3	3	
- Thurrock	2	2	
South East	58	23	40%
- Surrey	3	3	
- Milton Keynes	2	2	
East Midlands	49	18	37%
- Leicestershire	9	9	
West Midlands	38	16	42%
Yorkshire and Humber	37	9	24%
- Rotherham	4	4	
South West	37	8	22%
North West	39	8	21%
North East	17	6	35%
London	5	0	0%
Total	311	112	36%



Figure 2-2 Lorry parks

## Inappropriate (off-site) parking

In total, 18,670 lorries were parked overnight across England, with 39 percent of them observed to be parked off-site. A total of 15,012 appropriate spaces were recorded, which means that even if all of these spaces were filled, a theoretical excess of 3,658 lorries remain which cannot park in designated lorry parking areas. In practice, some of the available parking capacity is left unused on a daily basis and a significant number of HGVs park in laybys and other inappropriate places every day.

### Lay-bys

A layby has been considered as being used for overnight lorry parking if one or more lorry was recorded. Table 2-3 and Figure 2-3 below show the layby-usage and positioning across nine regions in England respectively. It is shown that across England around 51 percent of all laybys have been used by at least one lorry during the survey. South East has the most used laybys (326) at 59 percent of all laybys being used while East Midlands has the highest percentage of used layby in its own region (65%) with 470 laybys used. Although London has the highest percentage of used laybys in its region, it may not accurately indicate the demand due to the small sample size (only nine laybys in total), however it is known from consultation that a parking problem exists in London.

Layby usage rate analysis has also been carried out on the county and metropolitan area level to identify the local demand. Counties with highest layby usage rate are shown in Table 2-3 below. Please note that counties and metropolitan areas with less than 40 laybys are not individually listed due to the small sample size. Similarly to the lorry park analysis, regions with high layby usage rate tend to have more counties with a high layby usage rate. It can be seen that the counties with highest percentage of utilised laybys are Leicestershire, Derbyshire and Kent with 78, 72 and 71 percent utilised respectively. It is worth noting that Leicestershire also has the most critical lorry parks (nine out of nine) as shown in Table 2-2. In addition to Kent, Essex and Cambridgeshire are shown to have the most used laybys (84, 81 and 69 respectively). Part of the reason for this is that many foreign drivers do not want to pay for overnight parking and hence look for somewhere that is free of charge.

Region	Total Laybys	Used Laybys	Percentage
South East	554	326	59%
- Kent	118	84	71%
- Hampshire	107	66	62%
- Oxfordshire	84	51	61%
East Midlands	470	304	65%
- Northamptonshire	95	62	65%
- Leicestershire	69	54	78%
- Derbyshire	61	44	72%
East of England	559	297	53%
- Essex	132	81	61%
- Cambridgeshire	111	69	62%
West Midlands	362	188	52%
North West	357	183	51%
South West	523	176	34%
Yorkshire and Humber	276	128	46%
North East	287	105	37%
London	9	8	89%
Total	3,397	1,715	51%

#### Table 2-3 Regional Layby Utilisation



Figure 2-3 Layby usage

#### Industrial areas

Industrial areas with off- site lorries are categorised into three groups (i.e. low usage, medium usage and high usage) as shown in Table 2-4 below to help indicate areas with high demand for lorry parks.

Categorisation	Number of Lorries Parked
Low usage	5 or less
Medium Usage	5 to 10
High Usage	More than 10

#### Table 2-4 Industrial Usage Categorisation

Table 2-5 and Figure 2-4 below show the utilisation and positioning of industrial areas across the England respectively. It can be seen that East Midlands and West Midlands have the most highly used industrial estates (17 and 14 sites respectively). They also have the highest percentage of highly used laybys in their regions with around 16 percent of all industrial estates having more than 10 lorries parked in them. The heat map shown in Figure 2-4 demonstrates that the areas of intensive use for lorry parking include the M1, M6, M25 and A34 corridors.

Counties with highest lorry occupancy rate of industrial estates are listed in Table 2-5 below. Similarly, counties with less than three industrial estates with a high usage rate are not listed due to the small sample size. It can be seen that Northamptonshire has the most highly used industrial estates with six. It is followed by Leicestershire and Warwickshire which have five highly used industrial estates. Warwickshire has the highest percentage of highly used industrial estates (42%). It is worth mentioning that Northamptonshire, Derbyshire and Leicestershire are also counties with high layby usage rates shown in Table 2-3 and Leicestershire also has the highest number of critical lorry parks shown in Table 2-2. The variance between industrial estates could be explained by a number of factors such as size, tenants and land holders within the sites and differences in local authority/planning policies in the area.

Region	<b>Total Estates</b>	High Usage	High Usage % in the region
East Midlands	115	17	15%
- Northamptonshire	24	6	25%
- Leicestershire	31	5	16%
- Derbyshire	18	4	22%
West Midlands	86	14	16%
- Warwickshire	12	5	42%
North West	150	10	7%
North East	108	9	8%
South East	128	6	5%
Yorkshire and Humber	95	5	5%
South West	67	4	6%
East of England	26	3	12%
London	26	0	0%
Total 886		68	8%

#### Table 2-5 Regional Industrial Estates Usage



Figure 2-4 Industrial Estates Utilisation

### Combined off-site parking

The off-site parking recorded for laybys and industrial estates has been combined into a utilisation density 'heat map' shown in Figure 2-5. This map illustrates the areas of England with the greatest off-site parking issues and will be used to represent off-site parking throughout the rest of the chapter.



Figure 2-5 Combined off-site parking

## Identified areas of high demand

Using the off-site parking data as well as lorry park utilisations, this section details an analysis undertaken into local 'hot spots'. In each 'hot spot' discussed, a map is shown which combines the previously shown lorry park utilisation map and the off-site heat map in Figure 2-2 and Figure 2-5. Areas discussed include:

- The Midlands logistics hub
- The South-East of England
- The Port of Liverpool
- The Port of Southampton
- The North-East of England including Teesport and the Port of Tyne.

### East Midlands and West Midlands – Logistics Hub

The East Midlands was found to have the greatest number of vehicles parking off site with 65 percent of laybys used and 25 percent of industrial estates with more than 10 lorries parked in them. The high density of off-site parking and critical lorry parks can be found along the M1 corridor in the East Midlands region. That is also where the 'golden triangle' is located which is the area where logistics activity is most concentrated and is considered a prime location for National Distribution hubs. Traditionally, the "golden triangle" in the Midlands is bounded by the M1, M6 and M42 and has been a key hub for logistics activity for the last 40 years. The main reason for this is that drivers can reach most areas of the UK from here within a HGV driver's working day. The term 'logistics hub' was coined by property developers keen to attract business to the Midlands based on a national hub and 'spoke' distribution pattern. Unsurprisingly, it can be seen that a high density of used laybys and critical lorry parks are concentrated around this area. A high percentage of industrial estates with more than 10 lorries are also observed around the logistics hub. The demand for lorry parks near the logistics hub can be further illustrated by looking at the counties which are associated with the "golden triangle". This explains why Leicestershire has most critically parked lorry parks and is the county with highest off-site usage rate as analysed in the previous section.



Figure 2-6 Hotspot with Layby Usage and Critical Lorry Parks

### South East and East of England

The Strategic Road Network surrounding the five major ports (Felixstowe, Harwich, Dover, Medway and London Gateway), as well as the Channel Tunnel entrance/exit in Dover, in the South East and East of England is under a lot of pressure for additional lorry parking as can be seen in Figure 2-7. In particular, the SRN around the port of London Gateway shows the high density of used laybys and criticial lorry parks. It can also be seen that there are a relatively high percentage of industrial eastates with inappropriate lorry parking around London Gateway.

The heat map below shows high off-site parking on the M20, A2, A14 and A120 surrounding the ports of Felixstowe, Harwich, London Gateway and Dover. It is worth noting that almost all laybys are used for parking by lorries on the A12 in Essex (which has four critical utilised lorry parks) while the entire county of Kent incurs significant off-site lorry parking as illustrated by the heat map.



Figure 2-7 Hotspot with Layby Usage and Critical Lorry Parks

## Port of Liverpool

Figure 2-8 shows a high off-site parking density around Merseyside with a number of industrial estates in high usage around the Port of Liverpool. It has been suggested in a previous study that there are a limited number lorry parks close to the Port of Liverpool and a number of those are at critical utilisation. It is recognised that if a lorry park is to be considered in the North West, providing one in the immediate vicinity of the Port of Liverpool and on the M6 and M62 corridors should be a high priority. It is understood that a new MSA on the M62 near Warrington is currently an advanced state of planning.



Figure 2-8 Hotspot with Layby Usage and Critical Lorry Parks

### **Southampton Port**

The A34 in the South leads north from the ports of Southampton and Portsmouth and has high levels of off-site parking. It is worth noting that almost all laybys had HGVs parked in them during the survey and there were several heavily utilised industrial estates with 10 or more parked lorries, as shown in Figure 2-9. A high number of serious and critically utilised lorry parks are observed along the A34, which explains a high layby usage rate in Hampshire and Oxfordshire in Table 2-3. Also worth noting are the A34 and the eastern end of the A303 which also incur a reletively high level of demand for HGV parking.



Figure 2-9 Hotspot with Layby Usage and Critical Lorry Parks

### North East - Teesport

The North East as a region as a whole has relatively low percentage (37%) of laybys being used during the survey. However, the area indicated in Figure 2-10 incurs high off-site parking surrounding Teesport and Tyneside along with several lorry parks with critical utilisation on the A1 and A19 corridors. Additionally, a number of industrial estates within the immediate area of the port are shown to have medium or high usage indicating they are intensively used by lorries. This suggests a lorry park could be very beneficial if located near the port or on the A1 and A19 corridors.



Figure 2-10 Hotspot with Layby Usage and Critical Lorry Parks

## Lorry park success factors

#### **Statistical analysis**

A high level statistical analysis has been carried out using the DfT data in order to determine the factors affecting lorry park utilisation. This involved consideration of whether the facility included toilets, showers, a café, CCTV, lighting, a security fence and accommodation. The quality of these facilities was not considered (the presence of one shower was equal to the provision of numerous high quality showers and changing facilities). The analysis resulted in the conclusion that a security fence was the characteristic most likely to result in increased utilisation of a lorry park while lighting and accommodation were also strongly correlated.

Interestingly, the parking charge is observed to be positively related to the lorry park utilisation which indicates that lorry parks with higher parking changes more often had a higher utilisation. This demonstrates that some drivers are less concerned with the cost of a facility when compared to the provision of facilities (i.e. drivers are happy to pay a premium for access to these facilities). It is known that a proportion of customers insist that their goods in transit are kept to a secure lorry park at night to minimise the risk of theft. This usually relates to the movement of high-value goods.

### **Case studies**

Three case studies have been investigated which involved comparing lorry parks located in close proximity to each other and that incur significant differences in utilisation. These case studies are discussed below and are at the following locations:

- 1. Goole (Yorkshire and the Humber, M62)
- 2. Crawley (South East, M23)
- 3. Ipswich (East of England, A14)

#### Goole

Table 2-6 and Figure 2-11 below outline the first case study which compares three lorry parks, one of which is critically utilised while the other two are below 50 percent. The difference in utilisation between Lorry Parks A and B may be explained by provision of accommodation while comparing Lorry Parks B and C illustrates that the provision of CCTV and a security fence is likely to increase the lorry park's utilisation. Additionally, as Figure 2-11 shows, Lorry Park B is located in closer proximity to the M62 which will positively influence the utilisation.

#### Table 2-6 Lorry park comparison - Case Study 1

Facility	Lorry park A	Lorry park B	Lorry park C
Toilets & Showers	$\checkmark$	$\checkmark$	$\checkmark$
Café	$\checkmark$	$\checkmark$	$\checkmark$
Security fence & CCTV	$\checkmark$	$\checkmark$	x
Lighting	$\checkmark$	$\checkmark$	$\checkmark$
Accommodation	×	$\checkmark$	$\checkmark$
Parked lorries / Capacity	16 / 40	52 / 60	19 / 40
Charge (per night)	Unknown	£16.50	£22.00
Utilisation	40%	87%	48%



Figure 2-11 Case Study 1

#### Crawley

In this example, although Lorry Park B does not include security, it still incurs a far greater utilisation than Lorry Park A or C. The difference in utilisation between Lorry Park A and Lorry Park B can be explained by the presence of a café and accommodation as well as its location directly on the SRN. Lorry Park C is also located directly on the SRN however does not incur the same utilisation of Lorry Park B which can be explained by the lack of showering facilities, accommodation and also due to the reduced capacity which may mean drivers are more concerned about the lack of security and social interaction.

#### Table 2-7 Lorry park comparison - Case Study 2

Facility	Lorry park A	Lorry park B	Lorry park C
Toilets & Showers	$\checkmark$	$\checkmark$	×
Café	x	$\checkmark$	$\checkmark$
Security fence & CCTV	×	×	×
Lighting	x	$\checkmark$	$\checkmark$
Accommodation	×	$\checkmark$	×
Parked lorries / Capacity	5 / 15	27 / 25	1 / 6
Charge (per night)	Unknown	£28.00	Unknown
Utilisation	33%	108%	17%



#### Figure 2-12 Case Study 2

#### **Ipswich**

This case study includes four lorry parks located in close proximity to the SRN near Ipswich on the A12 and A14 which link the Port of Felixstowe to the rest of England. At the time of the survey, the utilisation across the four facilities ranged from 56 percent to 88 percent. Each facility includes different features however none of them include the option for accommodation. The lower utilisation at Lorry Park A relative to the other three lorry parks can be explained by their locations on the higher freight volume route of the A14 compare to the A12. Lorry Park B may incur a greater utilisation than Lorry Park C due to the presence of a café while Lorry Park D may have its lower utilisation explained by the fact that it contains such a large capacity. The number of lorries parked in Lorry Park D is 94 which is greater than the other three lorry parks combined. Lorry Park D also provides resilience to the local area as it is known that the additional supply at this location is used for temporary vehicle storage when the operations of the nearby ports are halted due to bad weather. The features and locations of these lorry parks are displayed in Table 2-8 and Figure 2-13.

Facility	Lorry park A	Lorry park B	Lorry park C	Lorry Park D
Toilets & Showers	×	×	×	$\checkmark$
Café	$\checkmark$	$\checkmark$	x	$\checkmark$
Security fence & CCTV	×	×	x	$\checkmark$
Lighting	×	×	$\checkmark$	$\checkmark$
Accommodation	×	×	x	×
Parked lorries /	14 / 25	22 / 25	18 / 25	94 / 150
Charge (per night)	Unknown	Unknown	Unknown	£18.00
Utilisation	56%	88%	72%	63%

#### Table 2-8 Lorry park comparison - Case Study 3



#### Figure 2-13 Case Study 3

### Lorry park segmentation and 'high quality' lorry parks

It is known that demand can exist for different types of lorry parking depending on the needs of the driver. This creates segmentation in the supply of lorry parking facilities from the 'high quality' lorry parks with all the drivers needs catered for to the 'cheap and cheerful' lorry parks which provide a low cost option. Figure 2-14 outlines the segmentation of lorry parking across England using the following criteria:

- 'High Quality' any lorry park with the presence of toilets, showers, a café, accommodation and security
- 'Cheap & Cheerful' any lorry park costing less than £5 for an overnight stay
- Middle of the range any lorry park that did not fit into either of the other two categories (or where the price was not known, thus a number of these may actually be 'Cheap & Cheerful').



#### Figure 2-14 Lorry park segmentation

#### 'High quality' lorry parks

In total, there are 16 lorry parking facilities which are classified as 'high quality' due to the presence of showers, toilets, accommodation and security. Of these, seven are critically utilised, one is seriously utilised and eight are acceptable. Four of the acceptably utilised lorry parks that are situated in areas with high off-site parking have been investigated to determine why this might be the case. Table 2-9 outlines the capacity and number of lorries parked at each facility based on the DfT survey as well as an observed capacity based on google aerial imagery and a theoretical utilisation based on this observed capacity. Both stated capacity and observed capacity are estimates and they vary since each uses a different method. Stated capacity is from the DfT survey in 2017 where data collectors estimated the capacity from ground level while on-site compared to observed capacity which was estimated by counting the number of spaces using Google imagery of the lorry park.

Ref	Truck Stop	Parked lorries (DfT survey)	Stated capacity (DfT survey)	Observed capacity (Google imagery)	Utilisation (from observed capacity)
1	Moto Service (Lymm)	236	400	281	84%
2	Markham Moor Truckstop	60	100	75	80%
3	Lincoln Farm Truckstop	0	8	8	0%
4	Hawkins Transport Village	38	60	< 50	>76%

#### Table 2-9 Underutilised high quality lorry parks in areas of high demand

When the observed capacity from aerial imagery is used to calculate lorry park utilisation, it is likely that three of these lorry parks would be considered critically utilised rather than acceptably utilised. When considering the Lincoln Farm Truckstop, which did not have a lorry parked in it at the time of the survey, the lack of demand can be explained by the very small capacity and the requirements of the facility for drivers to call and book in advance. Additionally, the Lincoln Farm Truckstop is located on the A452 which is not part of the Strategic Road Network (SRN). This facility is likely to be used by returning lorry drivers familiar with the route. Considering this investigation, it can be reasonably concluded that any high quality lorry park operating in an area of high demand is likely to be successful. Figure 2-15 outlines each of these facilities.



Figure 2-15 High quality lorry park

#### 'Cheap & Cheerful' lorry parking

There are 33 lorry parks classified as 'Cheap & Cheerful' across England as shown in Figure 2-16. This type of lorry park is considered to provide an alternative to off-site parking for those drivers unwilling to pay very much for a park, either because it comes out of their own pocket or they get to keep whatever is left over from an allowance, Without a good coverage of acceptably utilised 'Cheap & Cheerful' lorry parks, drivers cannot be reasonably expected to stop parking in laybys or industrial estates. The majority of these lorry parks located in areas of high off-site parking are critically utilised, meaning that they are likely to be turning away drivers.



Figure 2-16 Cheap & Cheerful lorry parking

### Critical lorry park success factors

Using the information outlined throughout this section, a number of success factors can be identified however provision of these characteristics does not necessary guarantee success as the demand market is highly segmented. The following characteristics have been identified to impact on the success of a lorry park:

- Security the provision of security fences, CCTV and security guards improves the utilisation of a lorry park and provides the justification for some drivers to pay for parking rather than using laybys or industrial estates.
- **Facilities** The provision of good quality toilets and washing facilities along with the option to purchase a meal and accommodation are all linked to improved utilisation.
- Location The location of a lorry park greatly impacts its utilisation. Determining whether a site is a good location for a lorry park depends on:
  - If there is high demand in the area for lorry parking in the form of high off-site parking or highly utilised existing lorry parks
  - The network of lorry parks in the surrounding area (ie. provision of lorry parks at a consistent distance along a stretch of road is likely to increase the utilisation of all of them due to increased predictability)
  - The proximity of the site to major freight generators and attractors (ie. ports, industrial estates, etc.)
- Distance from the SRN The further a lorry park is away from the SRN the less likely it is to be highly utilised. New lorry park developments should aim to be as close as possible to the SRN with clear signage to direct lorries of the SRN where possible.
- **Price** There is no specific price which leads to increased utilisation of a lorry park however carefully considering the needs of the drivers at that particular site and developing and pricing the lorry park appropriately can result in improved utilisation. This could be in the form of a high value lorry park with all of the facilities or alternatively a relatively cheap facility with access to basic amenities.
- **Visibility and availability** To provide a lorry park with the best chance of being highly utilised, drivers must be able to find the lorry park easily both online and while they are driving. This comes in the form of road signage and registering the lorry park with various lorry parking apps (eg. inTruck).

## **Summary and Actions**

## Existing supply and demand

Figure 2-17 shows lorry parks by utilisation as well as high density off-site parking which summarises the existing supply and demand for lorry parking based on the DfT 2017 survey.



Figure 2-17 Summary of existing supply and demand

### Areas in need of additional lorry parking supply

Using the analysis conducted on the DfT data throughout this chapter, the following areas (shown in Table 2-10) have been identified to be in the highest need for additional lorry parking capacity. A full list of local authorities which have been identified to have lorry parking issues is provided in Appendix B.

Region	County	Road corridor	Specific local authorities
EAST MIDLANDS	DERBYSHIRE	A38, A50	Amber Valley, Derby, Erewash, South Derbyshire
	LEICESTERSHIRE	M1, M69	Blaby, Charnwood, Harborough , Hinckley and Bosworth, Leicester, North West Leicestershire
	NORTHAMPTONSHIRE	M1, A14	Daventry, East Northamptonshire, Kettering, Northampton , South Northamptonshire, Wellingborough
	NOTTINGHAMSHIRE	M1	Ashflield, Bolsover, Broxtowe
EAST OF ENGLAND	SUFFOLK	A14	Forest Heath, Ipswich, Mid Suffolk, St Edmundsbury
	CAMBRIDGESHIRE	A14	Cambridge, East Cambridgeshire, South Cambridgeshire
NORTH EAST	COUNTY DURHAM	A1	County Durham
	MIDDLESBOROUGH	A19	Hartlepool, Stockton-on-tees
	TYNE AND WEAR	A1	Gateshead, Newcastle Upon Tyne, North Tyneside, Sunderland
NORTH WEST	LANCASHIRE	M6, M62	Chorley, Preston, South Ribble, St Helens, Warrington, Wigan
	MERSEYSIDE	A5036	Halton, Knowsley, Liverpool, Sefton, St Helens, Wirral
SOUTH EAST	ESSEX	M25, A12	Basildon, Brentwood, Chelmsford, Thurrock
	KENT	M20, M25	Ashford, Canterbury, Dartford, Maidstone, Medway, Sevenoaks, Shepway, Tonbridge and Malling
	OXFORDSHIRE	A34	Cherwell, Oxford , Vale of White Horse
	SUSSEX	M27	Eastleigh, Fareham, Portsmouth, Southampton
WEST MIDLANDS	WARICKSHIRE	M6, A14	Coventry, Rugby
	WORCESTERSHIRE	M5, M42	Bromsgrove, Wychavon
YORKSHIRE AND	SOUTH YORKSHIRE	M1, M18	Barnsley, Rotherham, Sheffield
THE HUMBER	WEST YORKSHIRE	M1	Leeds, Wakefield

#### Table 2-10 Key areas in need of additional lorry parking capacity - Existing supply and demand

### **Actions and Next Steps**

Some proposed actions and next steps that have been identified from the assessment undertaken in this chapter include:

- Increasing the provision and geographical coverage of 'high quality' lorry parks to improve the conditions for drivers required to spend nights out and ensure adequate security is available for those drivers who need it.
- Increase the provision of 'Cheap & Cheerful' lorry parking, particularly in areas of high off-site parking, to provide an alternative to those drivers unwilling to pay much for an overnight park.

# 3. Stakeholder-led demand analysis

## Methodology

The objective of the stakeholder engagement is to identify areas of high demand for lorry parking from an industry perspective while also gaining insight to the reasons why some lorry parks are highly utilised and others aren't. The key barriers to developing lorry parks are also discussed. To capture a broad range of perspectives and insight the following types of stakeholders were engaged (a full list can be viewed in Appendix C):

- Hauliers
- Trade bodies
- Facility providers
- Fuel providers
- Governmental organisations
- Highways England Traffic Officers.

## Identified areas of high demand

As part of the stakeholder consultation process, the Highways England Traffic Officers that have expressed an interest in freight were survey to identify lorry parking issues at a local level. This survey covered all regions of England with the majority of issues raised relating to inappropriate lorry parking in laybys or on hard shoulders. These issues are more likely to be identified from the Traffic Officers survey rather than the DfT 2017 survey which was targeted at overnight parking rather than lorries parking for their shorter day time break. The following are some quotes from Traffic Officer responses.

"Drivers seem to be unaware that the emergency refuge areas on the M4 and M5 should be used in emergencies only and are using them for short breaks"

"Laybys adjacent to the M6 near junction's 15 and 16 are always full of lorries parking overnight – these drivers have no access to facilities and thus there is always a large amount of litter and other waste in the area"

"HGV drivers using the incorrect areas that I have spoken to have stated that their companies will not pay for overnight parking and that the drivers are expected to pay for any facilities they use out of their own pocket"

"There are no real facilities along the M50. As an old motorway, the hard shoulders are not continuous, narrow and often do not have the sub soil structure to support the static weight of a parked lorry. This means that parked HGV's can easily overhang into a live lane"

Figure 3-1 displays the issues raised by the Traffic Officers while additional issues raised through the stakeholder consultation included:

- The A66 and A1 where adverse weather conditions and a lack of alternatives lead to poor resilience in the road network
- Trafford Park in Manchester a large industrial precinct with a lack of lorry parking supply
- Lincolnshire the fresh food region of England which relies on refrigerated transport and storage
- The South East of England.



Figure 3-1 Lorry parking issues identified by Highways England Traffic Officers

## Additional considerations

#### Lorry parking provision guidelines

The current guidance from Highways England regarding the provision of lorry parking on the SRN is that a facility should be provided every 28 miles. The interpretation of this guidance has varied between stakeholders with some assuming that this means in any 28 mile stretch of road there should be at least one lorry parking facility while others assume as long as drivers are always within 28 miles of a lorry park then the guidelines are satisfied. The latter effectively assumes that there only needs to be one lorry parking facility provided in any 56 mile stretch of road.

In addition to clarifying this set of guidelines to ensure that provision of a lorry parking facility is considered for every 28 mile stretch of road, there is an argument for amending these guidelines to encourage provision of a lorry parking facility in any 14 mile stretch of road on freight heavy road corridors. Typically, heavy goods vehicles make up approximately 12-13 percent of traffic volume (by number of vehicles) on average on strategic routes. One option for implementing this guideline would be if the heavy goods vehicle percentage of traffic exceeds 20 percent of traffic volume and thus could be considered a freight heavy road corridor. Regular and predictable provision of lorry parking is likely to reduce off-site parking as many drivers are unable to plan when and where they may need to park for the night until it's too late because they have run out of driving time or they only recently found out where their next destination is and have not had time to book ahead.

## "Drivers often don't know where they are going next until they drop off their most recent consignment"<sup>1</sup>

One example of where this type of approach of extra provision of rest areas has been implemented is on the M6 in the north west of England. A lorry parking facility has been provided at approximately 15 mile intervals from Lancaster to Carlisle which is an important road corridor for freight moving between Scotland or the north of England and the South. This provision of lorry parking has resulted in a significantly reduced problem of off-site parking in laybys and industrial estates along this stretch of road when compared to the rest of the country and other high volume and freight heavy corridors. Apart from good and regular provision of MSAs on the M6, these are a number of specific off-line lorry parks which are well signed from the Motorway. The signing of close-by rest areas is good practice.

### Barriers to lorry park development

There are a number of lorry parks currently in planning process including a site at Rothwell, Ashford and Brenley Corner; however more needs to be done to attract investment in the sector. A couple of obstacles to increasing the supply of lorry parks have been flagged up by stakeholders including:

#### • Planning permission

One of the main barriers is the difficulty in obtaining planning permission from local authorities. It is often more attractive to allocate land for residential development rather than lorry parks, even if sites are identified as suitable to develop into lorry parks from a national strategic perspective. One stakeholder suggested that it can take two years or more for a park provider to obtain the planning permission. It was also mentioned that 'mini' lorry parks (parks with 12 or less capacity) are more easily built with less planning constraints.

## "Some sites are identified to be suitable for lorry parking from a national perspective but are being overruled on a planning basis by local councils"<sup>2</sup>

#### • Time

Obtaining planning permission is a time-consuming process with many parties involved. More consistent and clearer framework for liaising with DfT, Highways England and local planning authorities is needed. It was suggested that the planning and decision-making process should be reviewed to streamline planning with less parties involved.

<sup>&</sup>lt;sup>1</sup> A quote from a haulier during stakeholder consultation

<sup>&</sup>lt;sup>2</sup> A quote from stakeholder consultation with the Road Haulage Association

#### Cost

The cost of increasing the size and number of lorry parking facilities is identified as the biggest burden by lorry park providers, with high investment but a long period of payback. It is estimated that more than one million pounds are needed to develop a lorry park with a capacity for 100 vehicles. A large cost is attached to obtaining planning, ecology surveys, noise and pollution surveys which are all necessary.<sup>3</sup>

#### Limited Guidance

Policy guidance on providing truck stops as part of road projects is very limited. It is recognised that national strategy or policy guidelines on the lorry park provision topic are needed.

#### "New parameters are needed to streamline planning with fewer parties involved"<sup>4</sup>

#### Lorry driver safety considerations

A survey has showed that one in six drivers was the victim of attack through organised crime in every five year period, and seven in 10 of these attacks happen at night while three in five of these attacks target the vehicle and its load. As recently as March 2019 a driver was attacked by a group of robbers while in his lorry which resulted in a serious injury.<sup>5</sup> The MotorTransport magazine recently (April 2019) stated that West Yorkshire experienced the most cargo thefts in 2018 with Northamptonshire, Kent, Leicestershire and Nottinghamshire rounding out the top five. Technology is helping as motion sensor cameras at some MSA's have been reasonably successful at capturing potential criminals with footage handed over to Police.

*"Comprehensive security which runs from 6pm to 6am is a big driver of demand for the facility"*<sup>6</sup>

### Technology in lorry parking

#### **Alternative fuels**

The use of alternative fuels to reduce the impact of the transport industries on the environment should also be considered when designing new lorry parks to encourage the take up of alternative fuels. Colocated lorry parking with fuelling facilities are effective ways to increase the utilisation of lorry parking facilities, thus lorry parking facilities under planning should consider the provision of power for electric lorries as well as fossil fuelled lorries. Although the use of alternative fuels for road haulage has not become mainstream as of yet, initiatives such as one identified by a stakeholder where electric vehicles are leased under 3-8 year terms with a 'buy back' guarantee from the manufacturer to de-risk the purchase for hauliers. It is likely that once a suitable 'green' lorry has been developed, the majority of the industry will switch. It is important that a lack of infrastructure does not present a barrier to the uptake of a 'greener' transport industry. Current thinking is that electric traction is likely to be the preferred power source for light to medium HGVs and gas for the heaviest tractor units.

#### **Applications**

Using apps to find suitable and safe lorry parks is already happening but it can be further developed. There are many emerging lorry park finding apps available currently on the market to help drivers to find secured and comfortable parking areas with facilities such as security guards, CCTV, fences, flood lights, toilets, showers and cafés etc. There is also potential to use lorry parking apps in conjunction with queuing systems for ports and industrial areas to more effectively regulate pick up/drop off times to reduce congestion.

## *"Technology is helping to alleviate lorry parking issues but drivers do not have access to live information regarding lorry park availability"*

Table 3-1 below shows three popular apps in the UK with a number lorry parking sites available in England and their key features and strengths. Given that security is estimated to be the biggest factor for parks' utilisation and now more of a welfare and safeguarding issue as much as load security, it is

<sup>&</sup>lt;sup>3</sup> i.e £10,000 construction cost per space at £15 revenue per night (100 percent utilised) means a payback period of 667 days <sup>4</sup> A quote from stakeholder consultation with the Freight Transport Association

<sup>&</sup>lt;sup>5</sup> <u>https://www.miltonkeynes.co.uk/news/crime/lorry-driver-brutally-assaulted-by-group-of-men-during-robbery-in-newport-pagnell-1-8845321</u> (12 March 2019)
<sup>6</sup> A quote from a lorry parking facility provider during stakeholder consultation

<sup>&</sup>lt;sup>6</sup> A quote from a lorry parking facility provider during stakeholder consultation <sup>7</sup> A quote from stakeholder consultation

believed that more and more truck drivers and companies will use the technology to find reliable parking areas with these characteristics. Stakeholders agree that technology is helping alleviate inappropriate parking, but further development can be achieved, such as live information, i.e. spaces available in the parking areas. Individual lorry parks do not have to be exclusively registered to any one app, thus any specific lorry park may be listed on each of the apps below at the same time. It's also worth noting that TRANSPark has 354 lorry parks listed which is greater than the 311 included in the DfT survey as TRANSPark covers the whole of England rather than just the SRN.

## Table 3-1 Truck Parks Finding Apps

Apps	sites	Types	Strength
SNAP	130	Truck stops and highly secured depots	<ul> <li>All accredited truck stops with reliable service and security.</li> <li>Pay through Vehicle Plate number</li> <li>Pre-booking service</li> </ul>
TRANSPark	354	Truck Stops	<ul><li>Wide coverage of areas including UK and Europe</li><li>Comprehensive information about security facilities</li></ul>
Truck Parking Europe	~3,000	Truck Stops, Laybys and Industrial Areas	<ul> <li>Comprehensive parking areas and spots including Truck stops, Laybys and Industrial Sites</li> <li>Wide coverage area including UK, Europe and other countries</li> <li>Comprehensive information about facilities</li> </ul>

#### Port queuing and lorry park collaboration

Technology also creates the opportunity for lorry parks and ports to collaborate for mutual benefit through the use of high quality queuing/waiting and marshalling areas. The following case study outlines the benefits available to both parties. In this case, the Port and the lorry parking facility are owned by the same entity. Establishing a similar relationship between two separate entities presents additional challenges and thus the benefits will have to be assessed on a case by case basis to determine if they are significant enough to overcome these challenges.

### CASE STUDY - VEHICLE BOOKING SYSTEM AT THE PORT OF FELIXSTOWE

The Port of Felixstowe, in Suffolk, is the United Kingdom's busiest container port, dealing with 48% of Britain's containerised trade with 9.74 million twenty-foot equivalent units (TEU) of traffic handled in 2018.

A Vehicle Booking System (VBS) was introduced in the Port of Felixstowe in 2006/7 which is a real-time, web-based booking system used by all hauliers to book a timed appointment for their container deliveries /collections. The system is free to use although some charges are in place during peak hours to guarantee the bookings and prevent misuse of the system.

The Port sets the number of VBS booking slots up to seven days in advance which will be released to the haulage operators between 3-6 days in advance. Hauliers must register with a VBS account (which is free) to book VBS slots (normally 1 hour) to deliver and collect containers at the Port. They also have to add their collection/delivery containers information to the booking details which will be checked at the gate on arrival.

The Port can limit VBS availability at specific times to manage the flow of haulage to/from the port. The system enables the Port to adjust resources to accommodate the demand by looking at the VBS bookings. A customer services team is provided to answer haulage customers' questions via telephone helpline.

Before the introduction of VBS, the majority of hauliers came to the Port during peak hours in the afternoon causing congestion on the site and adjacent roads, while there were many other hours of the day underutilised. More than 25 percent of hauliers arrived at the Port with the wrong information, e.g., containers are not booked on, which led to wasted journeys, traffic congestion and environmental costs.

The booking system has been proven to be beneficial for both the Port of Felixstowe and haulage operators. It significantly improves the efficiency of the Port by enabling better management and spread the arrivals, which reduces the congestion in the port area and on roadways around the complex. For hauliers, container details are pre-checked via VBS which significantly reduces the waste and number of empty trips. The system has also led to haulage operators maximising the utilisation of their trailer capacity during busy periods for each booking slot. In the event of bad weather or emergency, the port can remove all slots and inform hauliers immediately to avoid congestion and wasted time.

Vehicle Booking Systems are beneficial for both ports and the haulage operators and helps to smooth demand across the whole day. It is suggested that it would be advantageous to locate a large lorry park near any large volume port, which can provide a parking area and essential facilities for hauliers that arrive before their booked slots as drivers tend to arrive early to avoid missing their booking slot. This allows the drivers to turn the engine off and have a break while waiting for their slot, instead of waiting on the roads without any facilities while the engine is on. This can effectively reduce the road traffic congestion and improve the air quality. The lorry park can also acts as a marshalling area for trucks in the event of emergency such as bad weather, strike action or IT system failure issues which would have a knock-on effect on other traffic.

### **Emergency Parking**

#### **Eventuality Planning**

There are a range of other issues that merit consideration in terms of contingency planning. Some are best done at the Major Project Planning stage when a road is first designed, others need to be factored in around "business as usual" to reduce the impact of infrequent but potentially disruptive occurrences. They are as follows;

- 1. Closures due to strong/side winds particularly affected are high-sided vehicles such as doubledeck trailers
- 2. Closures due to snow or icy conditions, this is particularly an issue across exposed routes e.g. Trans-Pennine corridors

- 3. Rough Seas can cause delays or cancellations to sailings all around the UK and not just at Dover. This tends to affect high volume "driver accompanied" routes more
- 4. Event planning for shows, major sporting events and music concerts can cause disruptions
- 5. Emergency Lane 1, which is where on All Lane Running there is no hard shoulder but there is a need to facilitate prompt movement of emergency services
- 6. Project "U Turn", which could be designed to have periodic central lifting barriers and lane control run using RED X signalling
- 7. Project Fire where traffic is alerted to a severe vehicle fire that needs attention and probably 2 or 3 lanes of road closure to safely deal with the incident
- 8. Cobra style emergency staffing where additional staff are alerted of an emergency situation and extra resources report to work to help manage the scenario.

The need for well thought through contingency planning is important in minimising disruption to all users of the road network. Many road freight users are on urgent deliveries which have designated ETAs (expected time of arrival) and if vehicles are late there can be quite punitive financial penalties and further additional delays possible. Depending on the customer if a lorry misses its booked slot it may have to wait several hours until a suitable gap in the unloading/handling programme becomes available. This delay may cause further knock-on effects to other drops/loads that the driver was planned to do.

One of the main provisions to help address resilience issues is to have a lorry parking area that can facilitate off-road vehicle stacking in readiness for a managed return to normal operations once the cause of the problem is solved. Making sure the needs of the drivers are catered for during this period of disruption is important as it is both a welfare and safety issue. The delay can be of more than 24 hours and hence it is essential that toilet, food and rest facilities are made available.

In many cases there is a need to consider procedures for lorries as a specific response to the problem. There are already in existence specific schemes such as "Operation Stack" and "Operation Brock" related mainly to disruption to Cross-Channel freight traffic caused by a number of different problems e.g. rough seas, strike action, IT system failure and issues with illegal immigrants. The queues of HGVs can cause a tailback out of a freight terminal on to main roads and this in turn has a knock-on effect on other traffic.

#### **Additional or Emergency Parking**

Additional or emergency parking areas may be required to help mitigate some of the problems above. It is recommended that these emergency parking areas are built as annexes to existing or new Rest Areas so that they can operate normally as an ongoing viable business but can be called on to cater for specific circumstances. So the provision of additional parking areas and additional toilet/washroom and catering can be activated at almost immediate notice should an incident happen. It is expected that the "overspill" parking is a further fenced off area built to be as unobtrusive as possible with grasscrete or equivalent paved areas that can accommodate HGVs but do not look like barren concrete yards. Additional toilet blocks can be brought into use once site occupancy reaches a standard accepted level. Also additional catering staff and vending machines can be activated to cater for extra demand. The facility should have a potential briefing area and an area for accumulating vehicles to join a convoy in certain situations. So for example a platoon of 4 wheel drive or double drive HGVs could be assembled ready for a piloted platoon to perhaps negotiate a section of road under controlled and managed circumstances.

The following are two case studies which illustrate these issues;
#### Operation Snow Gate - for consideration as part of the design for the upgrade of the A66

The A66 is a strategically important road – one quarter of its 19,000 vehicles a day are lorries – and it provides Trans-Pennine connections between the M6 in Penrith (west) and the A1 in the east which is a primary route connecting Yorkshire and the East Midlands to Scotland. However, vehicles on the stretch of the Trans-Pennine corridor are affected by severe weather conditions every year, especially 2-wheel drive articulated HGVs which can more easily lose traction of worse be jack-knifed on icy roads.

Snow gates were installed on the Trans-Pennine road to improve safety during severe weather. The eastbound gates are on the carriageway near Augill Beck which at 1,400ft (426m) is one of the highest points along any trunk road in England. The westbound gates are near Bowes in County Durham closing the A66 off to westbound traffic as shown in Figure 3-2. During bad weather conditions including snow, the gates will be closed and the drivers asked to choose alternative routes and not risk getting stuck beyond the gates. According to Cumbria Police, the snow gates on A66 had been closed for 3 times in 2018 (January, March and November) due to severe weather conditions.

Highways England is now developing plans to fully dual the remaining six single carriageway sections, which total 18 miles of the complete 50-mile route. This will provide improved benefits to journey time reliability, safety, network resilience and connectivity for nearby villages and towns and ultimately increase the volume of traffic using the route. Thus, it emphasises the need for additional emergency lorry parking to be placed at the snow gates on the A66 to accommodate lorries during severe weather conditions when the gates are closed while the route is being cleared. Specifically, one park is recommended to be placed on the northern side of A66 near Brough to accommodate eastbound vehicles, and the other one is suggested to be placed on the southern side of A66 before the snow gate near Bowes as shown in Figure 3-2. The parks should be accessible for traffic from both sides, therefore facilities can be provided every 25 miles between Penrith and Scotch Corner as per the general guidance for lorry park provision. Additionally, advanced warning signs of gate closure should be displayed along the various routes leading to A66 such as M6, A685 and A1(M), so that alternative routes can be found at an early stage to avoid delay.



Figure 3-2 Emergency Snow Gate Lorry Parks

#### Operation Highsiders – example of closure of Severn Bridge crossings to high sided HGVs

Between 1992 and 1996, 13 vehicles were blown over on the Severn Bridge during high winds, resulting in more than 47 hours of closure. As a result, a high winds protocol was introduced.<sup>8</sup> The High Winds Traffic Filtering System ensures the M48 Severn Bridge remains open and operationally safe for Category 1 (cars) and Category 2 (light commercial) vehicles for as long as possible. However, when the wind speed reaches 40 knots, high sided vehicles (lorry or double-decker bus) are not permitted and an alternative route must be found. It is advisable to consider placing two additional lorry parking areas on both sides of the Severn Bridge to accommodate the extra demand of lorries in the event of bridge closure due to strong wind. Even though there is already an existing truck stop on the east side of Severn Bridge, the size of the park is considered too small to accommodate the demand in case of long delay. Thus, the extra lorry parking area and facilities are suggested to be attached to the existing park to cater for the high demand.

Advanced warning signs of bridge closure status should be put out along the various routes, such as M5, M4, M32 and A38, so that lorries can find alternative routes, for example using M4 Prince of Wales Bridge or A48, to travel to/from Wales to avoid delay.



Figure 3-3 Emergency parking for high winds

The issue of high sided trailers blowing over on other exposed parts of the SRN is an issue for further consideration. This is especially the case as the number of double deck 16 feet high trailers has grown considerable over the last decade.

<sup>&</sup>lt;sup>8</sup> <u>https://www.severnbridge.co.uk/Home.aspx?.Parent=&FileName=current-bridge-status7</u>

### Summary

#### Issues identified by stakeholders

The practical issues identified by Traffic Officers have been combined with the more general issues raised throughout the stakeholder consultation to summaries the issues raised throughout this chapter and create the map shown in Figure 3-4.



Figure 3-4 Summary of stakeholder identified issues

#### Areas in need of additional lorry parking supply

Using the stakeholder consultation and responses from Traffic Officers the following areas (shown in Table 3-2) have been identified to be in the highest need for additional lorry parking capacity.

Table 3-2 Key areas in need of additional lorry parking capacity - Existing supply and demain	and
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Region	County	Road corridor	Local Authorities
EAST MIDLANDS	LINCOLNSHIRE	-	Local Authorities in Lincolnshire
	NORTHAMPTONSHIRE	M1, A43	South Northamptonshire
	NOTTINGHAMSHIRE	M1	Broxtowe
EAST OF ENGLAND	BEDFORDSHIRE	M1	Central Bedfordshire
	CAMBRIDGESHIRE	A1, A14	Huntingdonshire, South Cambridgeshire
	ESSEX	M1, M25, A13	Uttlesford, Thurrock
	HERTFORDSHIRE	M1	Dacorum
NORTH EAST	COUNTY DURHAM	A66	County Durham
NORTH WEST	LANCASHIRE	A56	Rossendale
	GREATER MANCHESTER	M62, M67	Rochdale, Tameside, Trafford
SOUTH EAST	HAMPSHIRE	M3, A34	Basingstoke and Deane, Winchester
	KENT	M20	Ashford, Gravesham, Maidstone, Medway
	BUCKINGHAMSHIRE	M1	Milton Keynes
	SURREY	M25	Mole Valley, Surrey Heath
SOUTH WEST	BRISTOL	M32	Bristol
	GLOUCESTERSHIRE	M4, M5, A40	Forest of Dean, Stroud, Tewkesbury, South Gloucestershire
	SOMERSET	M5	North Somerset, Sedgemoor, Taunton Deane
	WILTSHIRE	M4	Wiltshire
WEST MIDLANDS	HEREFORDSHIRE	A40, A49	Herefordshire
	STAFFORDSHIRE	M6, A5, A500	Cannock Chase, South Staffordshire, Stafford
	WARWICKSHIRE	M6	North Warwickshire, Rugby
	WORCESTERSHIRE	M5	Bromsgrove, Malvern Hills, Wychavon
YORKSHIRE AND THE	SOUTH YORKSHIRE	M1, M18, A1	Doncaster, Rotherham
HUMBER	NORTH YORKSHIRE	A1	Harrogate, Richmondshire
	WEST YORKSHIRE	M1, A1	Leeds, Wakefield

#### **Actions and Next Steps**

Some proposed actions and next steps that have been identified from the assessment undertaken in this chapter include:

- Re-visit the lorry parking provision guidelines regarding distance between facilities on the strategic road network and freight heavy road corridors
- Assess the process required for private investors to develop a lorry park and identify where barriers can be removed to reduce the time and difficulty facing developers
- Review the options available for lorry drivers to park in secure facilities to reduce the occurrences
  of robbery and violent attacks
- Assess the business case for providing lorry parks for emergency planning purposes for when adverse weather results in route closures
- Consider installing charging points for electric and gas refuelling at new and existing lorry parks.

# 4. Theoretical analysis – demand from ports

### Methodology

This chapter explores the theory that import and export freight originating and destined for one of the UK's major ports is a significant driver of lorry parking demand. The theory regarding inbound freight relates to roll-on roll-off (Ro-Ro) freight where drivers in Europe use half of their allotted day's driver hours getting to a European port (eg. Calais) and have their break while on the vehicle ferry before using the second half of their hours (4.5 hours) in the UK before they are required to find a park for the night.

By identifying which ports the majority of inbound Ro-Ro freight comes through, demand for lorry parking from these vehicles can be identified by estimating where these vehicles will be with an additional four and a half hours of driving once on the UK Strategic Road Network. An assessment can also be conducted on outbound freight as it is known that vehicles often arrive at their port of departure early, sometimes the night before, to ensure that they do not miss their slot. Therefore, areas within 30 minutes to one hour from major outbound ports for Ro-Ro as well as lift-on lift-off (Lo-Lo) freight are likely to incur associated demand for lorry parking.

### Key freight origins and destinations

#### Inbound freight

Port statistics from the Department for Transport Statistics have been analysed to determine the volume of freight inbound through British ports via accompanied Ro-Ro in 2017. The Channel Tunnel has also been included in the assessment. Port statistics for the top ten ports by number of units are shown in Table 4-1. Holyhead has been included in this table given in proximity to the Strategic Road Network in England.

#### Table 4-1 Top ten English ports by number of inbound units (2017)

Rank	Port	Units (2017)	Percentage of UK
1	Dover	1,356,561	23.4%
2	Grimsby & Immingham	884,046	15.3%
3	Channel Tunnel	818,500	14.1%
4	London	484,151	8.4%
5	Bristol	442,040	7.6%
6	Southampton	341,817	5.9%
7	Medway	322,092	5.6%
8	Tyne	204,619	3.5%
9	Holyhead	147,777	2.6%
10	Harwich	100,035	1.7%

#### **Outbound freight**

The same set of statistics from the Department for Transport Statistics have been analysed to identify the English ports with the greatest number of outbound units. The top ten English ports (including Holyhead) are shown in Table 4-2.

#### Table 4-2 Top ten English ports by number of outbound units (2017)

Rank	Port	Units (2017)	Percentage of UK
1	Dover	1,516,023	15.9%
2	Felixstowe	1,333,225	13.9%
3	Southampton	1,107,908	11.6%
4	Channel Tunnel	818,500	8.6%
5	London	818,369	8.6%
6	Grimsby & Immingham	757,778	7.9%
7	Liverpool	545,028	5.7%
8	Tyne	436,421	4.6%
9	Bristol	237,588	2.5%
10	Holyhead	234,889	2.5%

### Identified areas of high demand

When analysing inbound freight, it was determined that only accompanied Ro-Ro freight would be considered given this is the type most likely to be impacted by the driver hour's restrictions which this analysis has been based on. This is because unaccompanied Ro-Ro and Lo-Lo freight can be collected at the port by vehicles from the UK which are less likely to have used half a day's allowance to get to the port. This theory is primarily targeted at Ro-Ro freight from the south-eastern ports destined for the north of England as this is the main segment which is likely to be significant and require an overnight stop prior to reaching the final destination. This results in the following ports being considered which account for 3.5 million units (lorries) or over 61 percent of all UK inbound traffic:

- Dover Port
- Channel Tunnel
- London Gateway
- Southampton Port
- Medway Port
- Harwich Port
- Port of Portsmouth.

Figure 4-1 outlines the results of the analysis which shows that inbound freight from these ports leads to elevated demand in the midlands despite the majority of this freight being destined for parts of England further north. This is because the midlands area sits within the range of four to four and a half hours drive time from the main Ro-Ro traffic ports in the south and south-east of England. This creates increased demand for lorry parking in a region which generates a lot of demand through the high number of industrial estates that are located there and the large population resident in the Midlands. Figure 4-1 classifies demand into the following categories; limited demand (within 4-4.5 hours from a low volume ports), some demand (within 4-4.5 hours from some low demand ports), medium demand (within 4-4.5 hours from a high volume port) and high demand (within 4-4.5 hours from most ports).

Figure 4-2 outlines the demand generated from outbound freight. This analysis includes unaccompanied Ro-Ro as well as accompanied Ro-Ro and also Lo-Lo freight. These ports are considered to start generating demand for lorry parking within one hour's drive from the ports while the region within 30 minutes' drive is considered to be in high demand for parking. As shown, the combination of ports in the south-east and their close proximity to each other compounds the demand for lorry parking on the road network in the region. Figure 4-2 classifies demand into two categories; some demand (within one hour on major freight routes) and high demand (within 30 minutes).



Figure 4-1 Lorry parking demand from inbound freight



Figure 4-2 Lorry parking demand from outbound freight

### Summary

#### Port driven demand for lorry parking

The inbound and outbound freight from ports driving demand for lorry parking has been estimated at a high level and combined as shown in Figure 4-3.



Figure 4-3 Summary of lorry parking demand driven by ports

#### Areas in need of additional lorry parking supply

Using the analysis conducted inbound and outbound freight the following areas (shown in Table 4-3) have been identified to be in the highest need for additional lorry parking capacity.

Table 4-3 K	Key areas	in need of	additional	lorry par	king capa	city -	Existing supply	and	demand
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Region	County	Road corridor	Local Authorities
EAST MIDLANDS	LEICESTERSHIRE	M1, M69, A46	Charnwood, Harborough, Hinckley and Bosworth
	LINCOLNSHIRE	M180, A1, A160, A180, A46	North East Lincolnshire, North Lincolnshire, South Kesteven
	NORTHAMPTONSHIRE	M1, A14, A43, A45, A5	Daventry
	RUTLAND	A1	Rutland
EAST OF ENGLAND	ESSEX	M11, A12, A1120, A13, M25	Brentwood, Chelmsford, Tendring, Thurrock
	SUFFOLK	A14, A12	Babergh, Ipswich, Suffolk Coastal
NORTH EAST	COUNTY DURHAM	A1, A19	County Durham
	TYNE AND WEAR	A1, A19, A194, A69 , A696	Gateshead, Newcastle upon Tyne, North Tyneside, Sunderland
NORTH WEST	CHESHIRE	M52, M56, M6, M62, A483, A55, A550	Cheshire West and Chester, Halton, Warrington
	LANCASHIRE	M55, M6, M61	West Lancashire
	MERSEYSIDE	M5036, M53, M57, M58, M6, M62, A59	Knowsley, Sefton, St. Helens, Wirral
SOUTH EAST	HAMPSHIRE	M27, M3, A3, A303, A31, A34, A36	East Hampshire, Eastleigh, Fareham, Havant, New Forest, Test Valley, Winchester, Portsmouth
	KENT	M2, M20, M25, M26, A2, A2010, A21	Ashford, Canterbury, Dartford, Dover, Gravesham, Sevenoaks, Swale, Medway
	WEST SUSSEX	A23, A27	Colchester
SOUTH WEST	BRISTOL	M5	Bristol
	GLOUCESTERSHIRE	M32, M4, M48, M49, M5, A40, A417, A46	Stroud, Tewkesbury, South Gloucestershire
	SOMERSET	M5	North Somerset
WEST MIDLANDS	WEST MIDLANDS	M42, M6	Solihull
	WARWICKSHIRE	M40, M6, M69, A45, A46	Coventry, Nuneaton and Bedworth, Rugby, Stratford-on-Avon, Warwick
	WORCESTERSHIRE	M42, M5, A46	Bromsgrove, Malvern Hills, Wychavon
YORKSHIRE AND THE	EAST RIDING OF YORKSHIRE	M62, A63	East Riding of Yorkshire, City of Kingston upon Hull

#### **Actions and Next Steps**

Some proposed actions and next steps that have been identified from the assessment undertaken in this chapter include:

- Increase the provision of lorry parking in the midlands beyond the demand that is from freight originating/destined for the area given a significant demand for lorry parking in the area is derived from through traffic between the south and the north.
- Assess the demand for lorry parking generated by ports and study the behaviour of these type of trips to determine the type of lorry parking demand and how best to address it (i.e. technology and apps).

# 5. Study on Safe and Secure Parking for Trucks (European Commission)

This chapter summarises the European Commission study which was published in February 2019. The study was undertaken for the purposes of determining:

- What the characteristics in terms of security and service are needed to make a parking facility sufficiently safe and secure and how users can be sure that the facility meets the requirements
- Where safe and secure lorry parking capacity is needed in Europe
- How companies investing in new parking facilities can be guided and supported to develop more safe and secure parking capacity whilst taking into account the need for adequate service levels.

#### Creating a common standard for the required levels of security and service

An EU-wide standard for lorry parking areas has the potential to create greater transparency and build trust amongst users, including the UK given a large portion of the demand for lorry parking in England comes from foreign drivers. In order to achieve the standard, parking areas will need to be independently and regularly checked to obtain certification. Four classifications were defined in regards to security ranging from Bronze through to Platinum where the following characteristics are assessed:

- Staff procedures (removal of unauthorised vehicles, alarm response, pre-booking availability, etc.)
- Entry / exit (presence of barriers, lighting, license plate recognition, gatehouse, etc.)
- Parking area (visibility, lighting, surveillance, line markings, manned 24/7, etc.)
- Perimeter (visual deterrents, physical deterrents, barriers, clear zones, etc.)
- The required services at the facility for it to achieve certification include:
- Working and available toilets (male and female)
- Working and available showers (male and female)
- Clean toilets checked at regular intervals
- Clean washing facilities checked at regular intervals
- Available and working water taps
- Available waste bins on site
- Clear signs promoting safe traffic movement and parking within the facility
- Emergency contacts displayed
- Snacks and drinks available for purchase at all times
- Internet connection available
- Electricity connection available for personal use.

#### Survey response

In total, 159 valid responses were received from the survey of drivers which was designed to determine parking habits as well as future needs or expectations. The results are outlined in Table 5-1, Table 5-2 and Table 5-3.

#### Table 5-1 Willingness to pay for safe and secure parking

Type of break	Never	Only when loaded	Always
Long night rests	19%	36%	45%
Short breaks	46%	28%	26%
Long weekly rests	27%	22%	51%
While waiting for the next assignment	61%	16%	23%

#### Table 5-2 Reasons to stay in a safe and secure parking area

Type of reason and break	No	Yes
Are you required to spend rest times in a safe and secure area for legal reasons?	17%	83%
Are you required to spend short stops in safe and secure area for legal reasons?	46%	54%
Are you instructed to use safe and secure area by your employers?	36%	66%
Do you need safe and secure area while waiting for your next assignment?	61%	39%

#### **Table 5-3 Driver opinions**

Question	No	Neutral	Yes
Is there enough information regarding availability of parking spaces and accommodation?	58%	27%	15%
Is the information available accurate?	58%	32%	11%
Is it the company's/employers responsibility to pay for parking?	36%	14%	76%

#### Existing supply and demand

Figure 5-1 outlines the existing demand for lorry parking in the UK based on vehicle movements as well as the supply of safe and secure facilities. There are no certified parking locations in the UK however there are a number of facilities which are assumed to be eligible for certification with only minor upgrades required based on advertised security and services.



Figure 5-1 Truck parking supply and demand in the UK

#### **Conclusions and next steps**

There is no consistent definition of safe and secure lorry parking across Europe and there is a lack of provision of these facilities for drivers. This study also identified that guidance is lacking on how to set up and operate these types of facilities. Broad implementation of the proposed accreditation process and further guidance on developing new facilities is likely to result in reduced crime and incident rates and improved driver conditions.

# 6. Conclusion and Recommendations

It is widely known amongst stakeholders that there is a lack of lorry parking supply in many areas across England which is leading to inappropriate lorry parking which creates hazards on the Strategic Road Network as well as unsafe conditions for drivers. There is a large problem with inappropriate parking in laybys and how to address this problem. Simply closing down problematic laybys does not solve the problem, it displaces it. This study has found that the 2017 DfT Lorry Parking audit outlining an urgent need for additional rest areas in six out of nine English regions is even more urgent now. The market for lorry parking is differentiated into 3 categories;

- 1. those that are willing to pay for high quality and secure parking
- 2. drivers who will pay for 'good value' parking
- 3. those who are unwilling to pay anything for parking, thus park in either lay-bys or industrial/retail estates.

There is a limited supply of 'high quality' lorry parks throughout England and the ones that are 'high quality' tend to be critically utilised, the provision of adequate security is a large factor in this, however there remains a place in the supply market for 'cheap and cheerful' lorry parking facilities.

Highways England Traffic Officers (those interested in freight), have been helpful in pointing out problem areas on the SRN and some geographical gaps on the network. This information has been used to validate the findings from the DfT survey in identifying lorry parking issues commonly seen during day time shorter breaks as well as overnight lorry parking, which was the primary focus of the DfT survey.

The process required to develop a lorry park (including land allocation) is very difficult and takes a long time. Despite this, it is largely considered a national issue rather than a local issue meaning that proposed lorry parks often do not progress past local authority approval. Until lorry parking is seen as a local issue it will be difficult to change this behaviour. Kent is one example where off-site lorry parking is now widely seen as a major issue and where lorry park development is encouraged at a local authority level.

New major "freight generators" such as new distribution parks and industrial estates should be required to consider the provision for lorry parking as it's unlikely that the new tenants of the industrial units will want to accommodate HGVs overnight. Thus, there is a responsibility on the developer to work with the relevant highways authorities to assess where this provision should be. Additionally, the design of new expressways needs not only to adhere to the same requirements for "rest areas" (every 28 miles) but also the "spirit of the requirement". In other words just because a new expressway might only be 22 miles long it doesn't mean that rest provision can be ignored. The new expressway is likely to be replacing an existing A Road which typically might have had several lay-bys and/or service stations along its length. There is also a need to consider alternative fuels and refuelling points in the provision of future MSAs and Lorry Parks and retro-fitting existing facilities for gas and electric freight vehicles. Further research on the location of high sided vehicle incidents is needed for contingency and emergency parking including snow gates and bad weather planning.

Very high demand for lorry parking in the East and West Midlands is supported by the theory that a significant proportion of inbound RoRo freight entering the country via Dover (and other south eastern ports) will require an overnight stop in this area due to driver's hours' time restrictions. This adds to the strong demand for overnight parking for drivers delivering into the Golden Triangle, which is driven by the high logistics and industrial land use in the Midlands. Demand identified from the 2017 DfT survey validates the theory that major outbound RoRo ports drive lorry parking demand in their local region. Assuming that drivers are not allowed to park inside port land overnight which is mostly the case, a proportion of drivers use their available driving hours to get as near as possible to the port or Eurotunnel check-in to ensure they can catch their pre-booked sailing/scheduled service.

Now that the areas of England in which additional lorry parking supply is needed most have been identified, as well as what types of lorry parks are in demand and where gaps in the currently supply exist, the next steps are to remove the barriers to investment (private or public) and development in the sector. The key points from the European Commission's *Safe and Secure Parking for Trucks* should also be considered as part of any future work.

# **Appendix A Regional Assessments**



### **East Midlands**

#### Strategic road corridors

The key road corridors in the North West include:

- The **M1** this is the major north-south route from the south-east of England to the midlands and the north. It also extends through the 'Golden Triangle' and cities including Leicester, Derby and Nottingham.
- The **A1** an alternative north-south route to the east of the M1 which is a more direct route for freight from the South East to the North East.
- The M69 a route extending from the South West through Leicester to the A52.
- The **A52** the major east-west route in the East Midlands which starts in the West Midlands and runs through Derby and Nottingham before connecting into the A1.
- The A14 an east-west route in the south of the region which extends east into the East of England and connects to the Port of Felixstowe.

#### Major freight generators and attractors

A large portion of the 'Golden Triangle' sits in the East Midlands which is considered the largest industrial precinct in the United Kingdom. Cities such as Northampton, Leicester, Derby and Nottingham are major freight generators in the East Midlands. Although it is not well serviced by the Strategic Road Network, and thus not under Highways England authority, the Lincolnshire region was also identified by stakeholders to be in need of additional lorry parking supply driven by the fresh food sector which is time sensitive and often requires lorries with the capacity to keep cargo chilled which should be considered as part of any lorry parking solutions developed for the area.

#### **Provision of lorry parking**

A total of 49 lorry parks were surveyed in the East Midlands as part of the DfT survey of which 26 were either critically or seriously utilised (over 70%). Majority of these lorry parks are situated in the M1 and M69/A46 around Leicester where each road corridor has a stretch of approximately 40 miles without a lorry park with an acceptable utilisation.

The East Midlands has only one known 'high quality' (containing all facilities/amenities) lorry park located on the A1 in the north of the region suggesting there is a gap in supply for this market segment. There are at least nine 'cheap & cheerful' (under £5 per night) lorry parks identified in the region however these are also concentrated in the north east of the region and are severely lacking along the M1 and M69/A46 where significant off-site demand is incurred.

#### Off-site lorry parking incurred

A significant amount of off-site lorry parking was captured in the DfT lorry parking survey (2017) along the entire length of the M1 through the region as well as the A1 and A14. Majority of the off-site parking surrounding the A1 was recorded in laybys where industrial estates in Northampton and the south-west of the region were found to have large numbers of off-site demand for parking.

#### Summary

This study has identified the region surrounding Northampton as well as the entire length of the M6 road corridor to be in significant need of additional lorry parking supply across all segment types. Additionally, the road corridors of the A14 and A1 incur significant off-site lorry parking while all three lorry parks on the A14 in the region are critically utilised.

Demand in this region is driven by the industrial activity associated with the 'Golden Triangle' however it has also been identified that the section of the M1 in the East Midlands is situated approximately 4.5 hours' drive from a number of major ports in the South East of England which means this area also incurs demand for lorry parking from freight destined for the north of England and Scotland but requiring an overnight stay in the Midlands on the way.





### **East of England**

#### Strategic road corridors

The key road corridors in the East of England include:

- The **M1** this is the major north-south route from the south-east of England to the Midlands and the North. Within this region it extends from the M25 northbound into the East Midlands.
- The **A1** an alternative north-south route to the east of the M1 which is a more direct route for freight from the South East to the North East.
- The M11 a route beginning at the M25 to the east of the A1 extending north meeting the A14.
- The A14 an east-west route beginning on the east coast at the Port of Felixstowe and extending across the region, intersecting with the A1 before passing into the East Midlands.
- The A12 links the Port of Felixstowe and Port of Harwich with London and the South East of England.

#### Major freight generators and attractors

The Port of Felixstowe and Port of Harwich are major freight generators in the East of England which drive demand for lorry parking. Additionally, the south of the region where the East meets the South East is a natural location for a regional distribution centre for the south-east catchment of England which generates a significant amount of freight.

The industrial areas including the 'Golden Triangle' are located immediately to the west of the region which is also a major freight generator along the road corridors in the region. Any freight travelling between the Midlands and the major Ports of Felixstowe or Harwich or the South East of England is likely to be using road corridors in the East of England.

#### **Provision of lorry parking**

A total of 31 lorry parks were surveyed in the East of England as part of the DfT survey of which 26 were either critically or seriously utilised (over 70%). The majority of these lorry parks are situated in the M1, A1 and A14. The stretch of the M1 in this region contains four lorry parks, all of which are critically utilised, while a 50 mile stretch of the A1 through the region was recorded to have no lorry parks with availability. Similarly, there were no lorry parks with availability recorded on the A14 west of Ipswich which is an 80 mile stretch of road.

The East of England has three known 'high quality' (containing all facilities/amenities) lorry parks, two of which were on the A1 with the other on the A14, all of which were critically utilised. There was only one known 'cheap & cheerful' (under £5 per night) lorry park identified in the region. It is recommended that further provision of both of these types of lorry parking is increased in the region.

#### Off-site lorry parking incurred

A significant amount of off-site lorry parking was captured in the DfT lorry parking survey (2017) in the south of the region surrounding the A12 and the M25 on the north side of the river Thames. There is also a significant amount of off-site lorry parking recorded in the region of the Port of Felixstowe and Port of Harwich.

#### Summary

This study has identified the region on the north side of the river Thames and the Ports of Felixstowe and Harwich to be in need of further lorry parking provision to address the high off-site parking. Additionally, the road corridors of the M1, A1 and A14 have very limited availability of parking with majority of lorry parks on these corridors being critically utilised. Each of these road corridors contain long sections without any lorry parks with availability which effectively pushes the issue to other parts of the region and adds to the lorry parking issues in the Midlands. The figure below outlines these issues and demonstrates the lack of lorry parks with availability in the region.





### **North East**

#### Strategic road corridors

The key road corridors in the North East include:

- The A1 this road corridor provides the primary north-south route through the region and connects the East of England region to Newcastle and the east of Scotland.
- The **M19** an alternative north-south route in the region which runs along the east coast and is a more direct connection between Newcastle and Teesport.
- The A69 an east-west route connecting Newcastle to the North West.
- The A66 a route that is only briefly in the North East but one that provides an important east-west connection for vehicles travelling between the North West and Teesport.

#### Major freight generators and attractors

Teesport and Tyne Port are the major freight generators in the North East along with their associated industrial precincts. The area surrounding Newcastle is the natural location for a regional distribution centre serving the North East and parts of Scotland.

#### **Provision of lorry parking**

A total of 17 lorry parks were surveyed in the North East as part of the DfT survey of which seven were either critically or seriously utilised (over 70%). All of the critically utilised parks are situated on the A1 or the M19. Lorry parks on the sections of the A1 and M19 immediately south of Newcastle in particular.

There is not known to be any 'high quality' or 'cheap & cheerful' lorry parks in the North East, thus provision of these types of parks to satisfy the varying types of demand should be considered.

#### Off-site lorry parking incurred

A significant amount of off-site parking was recorded in the area surrounding Newcastle in various industrial estates as well as laybys along the A1 to the south of Newcastle. A lack of provision on the A66 was also identified which can create off-site parking issues along this route particularly during adverse weather when it is closed for periods of time. This forces vehicles to park in laybys and on hard shoulders which in turn makes it harder to clear the road of snow and re-open the route.

#### Summary

This study has identified a need for additional parking in the Newcastle region targeted towards reducing the off-site parking. The most effective approach to reduced off-site parking is likely to be provision of 'cheap & cheerful' lorry parking in areas nearby industrial estates and in close proximity to the SRN. It is also recommended to promote the development of at least one 'high quality' lorry park in the region for those drivers willing to pay a premium.

Strategic provision of lorry parking on the A66 should also be considered to aid the operations of the route and provide an area for lorries to park while waiting for the route to re-open if it is closed during adverse weather. This would also make it easier for snowploughs and other vehicles to work on getting the route operational as quick as possible after closure.



### **North West**

#### Strategic road corridors

The key road corridors in the North West include:

- The **M6** major north-south route which extends from the southern border of the region near Stoke right up to the Scotland border. This road is nationally significant and is a key artery from vehicles travelling between the south of England and the North/Scotland.
- The **M62** this road corridor extends from Liverpool on the west coast of England east through Manchester to Leeds in Yorkshire and beyond. It provides a key east-west route in the north of England and is strategically very important due to the lack of alternatives in adverse weather conditions.
- The M56 this road corridor extends south from the Port of Liverpool before heading east and providing
  access to the M6 and Manchester. This route is strategically important from connecting the Port of
  Liverpool with the Midlands and south of England.
- The M60 provides a route around the congested area of Manchester.
- The **A66** this route provides an east-west connection in the far north of England between Penrith (North West) and Bowes (North East). It is important due to the lack of alternatives.

#### Major freight generators and attractors

The major freight generator in the North West is the Port of Liverpool which is the primary port on the west coast of the United Kingdom. The associated industrial precincts in Warrington and Trafford are also major freight generators and drivers of lorry parking demand.

#### **Provision of lorry parking**

A total of 39 lorry parks were surveyed in the North West as part of the DfT survey of which 15 were either critically or seriously utilised (over 70%). The majority of these lorry parks are situated in the Liverpool/Warrington and Manchester area which demonstrates the need for additional lorry parking supply. A number of the acceptably utilised lorry parks are located on the M6 in the northern part of the region which can be attributed to the even and regular spacing (approximately every 15 miles) which has reduced the volume of off-site parking in the area as shown by the figure below.

The North West has five known 'high quality' (containing all facilities/amenities) lorry parks which is the most of any region in England however the facilities located along the M6 in the south of the region are heavily utilised suggesting there is demand additional supply of this type of lorry park in this area. There are only two known 'cheap & cheerful' (under £5 per night) lorry parks identified in the region thus additional provision of these, particularly in areas of high off-site parking, is recommended.

#### Off-site lorry parking incurred

A significant amount of off-site lorry parking was captured in the DfT lorry parking survey (2017) in industrial estates around Liverpool and west Manchester as well as in laybys along the M6 as shown in the figure below. A number of lorry parking related issues were also identified by Highways England Traffic Officers on the M62 to the north east of Manchester.

#### Summary

This study has identified the region surrounding the Port of Liverpool, industrial precincts in Warrington and Trafford as well as the M6 road corridor is being in high demand for lorry parking and requiring additional lorry parking supply. Additionally, there is demand for lorry parking supply on the M62 to the north east of Manchester as identified by Highways England Traffic Officers. Supply of 'cheap & cheerful' lorry parking has been identified to be lacking in particular.

Although the North West incurs significant off-site demand, it also demonstrates how to effectively provide lorry parking along the northern section of the M6 where facilities are provided at regular intervals which has reduced the issue of off-site lorry parking demand in the area.





# South East

#### Strategic road corridors

The key road corridors in the South East include:

- The **M2/A2** this route provides a connection from London and east London to the south east of the region and Dover. It is also used by vehicles accessing Medway Port.
- The **M20** this route provides an alternative connection between Dover and London and is situated west of the M2. This corridor provides a more direct route to Dover from west London and the South England.
- The **A3** this road corridor extends south west from London and provides the most direct connection to Portsmouth and Southampton Ports.
- The **A34** this route is located to the west of the region and provides a north-south connection between Southampton and the Midlands.
- The M25 this route acts as a ring road for London however also forms the primary north-south route to the east of London.

#### Major freight generators and attractors

There are six major ports located in the South East (including the channel tunnel) which can all be considered to be large freight generators and attractors. Additionally, four of them are located south of the river Thames but east of the M20 which creates a significant amount of freight to the east of London and along the M2. Southampton and Portsmouth ports also generate and attract significant volumes of freight due to their more direct connection with the Midlands logistics area, a route which avoids the need to transverse across congested London motorways.

#### Provision of lorry parking

A total of 58 lorry parks were surveyed in the South East as part of the DfT survey of which 34 were either critically or seriously utilised (over 70%). These parks are located right across the SRN in the region with the M2, M20, M25 and A34 incurring the most number of critically utilised parks. The longest stretch of road in the South East that does not have a lorry park at an acceptable level of utilisation is on the A34 from Southampton to Oxford in which a driver not willing to divert off the A34 could potentially drive over 60 miles without seeing a lorry park with availability. The South East has two known 'high quality' lorry parks (both of which were recorded at over 70% utilisation) and seven known 'cheap & cheerful' (under £5 per night) lorry parks. Of the 'cheap & cheerful' lorry parks, none are located in the south-east area along the M2 and M20 while the only two located on the A34 were recorded at over 70 percent utilised. Thus, although there are four acceptable utilised 'cheap & cheerful' lorry parks in the region, it is recommended that provision is increased in areas which are incurring significant off-site demand.

#### Off-site lorry parking incurred

The areas of significant off-site demand in the South East echo the areas of high demand identified through analysing lorry park utilisations. The M2 and M20 road corridors incur a significant amount of off-site parking, particularly near the M25 in both industrial estates and laybys. Laybys along the A34 are also heavily used for off-site parking.

#### Summary

This study has identified the area in the south-east of the region around the M2, M20 and M25 to be in significant need of additional lorry parking provision in order to reduce the existing off-site lorry parking issues. When considering the provision of additional lorry parking in this area, encouragement should be given to both 'high quality' and 'cheap & cheerful' lorry parks among others given the lack of existing lorry parks with these characteristics. The road corridor of the A34 is also in need of additional lorry parking supply to reduce the issue of off-site parking and also because all existing capacity is being utilised. Similarly to the south-east of the region, a range of lorry parking types is recommended to satisfy a range of demand segments.





### **South West**

#### Strategic road corridors

The key road corridors in the South West include:

- The **M5** this route stretches from Exeter north through Bristol and Gloucester on the way into the Midlands towards Birmingham. This road corridor is the most direct and strategically important route between the South West and the Midlands/North England.
- The **M4** this route provides an east-west connection across South England, extending east from Bristol toward London and the South East.
- The A303 this route provides a more direct connection between London and Exeter and the far south west of the region.
- The A419 this short road corridor is strategically important in the South West as it links Gloucester with the M4 and would be part of the most direct route to Southampton and the South East.
- The A40 there is only a short section of this route in the South West however it is located in an
  important area of the region and is a key connection route between the South West and Wales, the
  West Midlands and the North West.

#### Major freight generators and attractors

Bristol Port is the major freight generator and attractor in the region with the industrial areas of Gloucester also creating a lot of freight movements. The Welsh capital city of Cardiff is also located approximately 30 miles to the west of Bristol which is likely to generate freight movements through the South West.

#### **Provision of lorry parking**

A total of 37 lorry parks were surveyed in the South West as part of the DfT survey of which 21 were either critically or seriously utilised (over 70%). Majority of these highly utilised lorry parks are located in the vicinity of Bristol and Gloucester on the M5, M4 and A419 road corridors. There are also two seriously utilised lorry parks on the A303 which are the only lorry parks on this stretch of road east of Exeter for over 70 miles.

The South West has only one known 'high quality' lorry park however it is located in Bristol and survey to be at an acceptable utilisation level which could be considered an appropriate level of provision in this region. There are six known 'cheap & cheerful' (under £5 per night) lorry parks however none are located in the Bristol and Gloucester region along the M5, M4 or A419.

#### Off-site lorry parking incurred

Majority of the off-site parked lorries observed in the South West as part of the DfT survey were in laybys along the M5, M4 and A419 near Bristol and Gloucester. Additionally, a number of lorry parking issues were identified in these regions by Highways England Traffic Officers which highlights the need to be strategic about how to provide additional lorry parking supply to ensure the demands of these drivers are met.

#### Summary

This study has identified the area surrounding Bristol and Gloucester to be in significant need of additional lorry parking supply including the road corridors of the M5, M4 and A419. The number of issues identified by Traffic Officers suggests a more thorough investigation into these specific areas to identify the particular demands of the lorry drivers that are parking off-site. Given the lack of 'cheap & cheerful' provision in the area, additional supply of this type of lorry parking capacity is likely to reduce the magnitude of the issue.



### **West Midlands**

#### Nationally strategic road corridors

The key road corridors in the West Midlands include:

- The **M5** this route stretches from Bristol in the South West in the West Midlands to Birmingham and is the most direct route for majority of West Midlands (and North West) freight movements to the south.
- The **A46** this road corridor provides a route through the south-east of the region between Gloucester in the South West and the East Midlands.
- The M6 this road corridor extends east from Birmingham into the East Midlands and also north of Birmingham to the North West. It is a very strategic and important route for the connectivity of the West Midlands to the rest of England.
- The **A5** this route provides connectivity through the logistics hub of the midlands between areas north of Birmingham to Northampton in the East Midlands.
- The M40 this route extends south-east of Birmingham and is one of the most direct routes to London.

#### Major freight generators and attractors

There are no ports in the West Midlands however the large industrial and logistics precinct known as the 'Golden Triangle' that spans across the Midlands generators a significant volume of freight in the region east of Birmingham. Additionally, Birmingham is the second most populous city in England which also creates a significant volume of freight for the West Midlands.

#### **Provision of lorry parking**

A total of 38 lorry parks were surveyed in the West Midlands as part of the DfT survey of which 25 were either critically or seriously utilised (over 70%). Majority of these highly utilised lorry parks are located west of Birmingham on the M40, A45, M6 or A5 however there are also a number on the M5 south of Birmingham and the M6 north of Birmingham.

There are three known 'high quality' lorry parks in the West Midlands which is considered to be a reasonable level of provision however only one of the lorry parks is located to the east of Birmingham where the greatest demand for lorry parking is incurred. There are five known 'cheap & cheerful' (under £5 per night) lorry parks located in the region however only one is located east of Birmingham which is critically utilised.

#### Off-site lorry parking incurred

Significant off-site parking has been observed in the West Midlands along all major routes outlined above. Majority of the off-site parking along these road corridors was observed in laybys however a number of industrial estates to the east of Birmingham were also being used for off-site parking. Additionally, a number of issues were reported by Highways England Traffic Officers along the M5 to the south of Birmingham and M6 both to the east and north of Birmingham.

#### Summary

This study has identified the area to the east of Birmingham to be in significant need of additional lorry parking across all demand segment types including 'high quality' and 'cheap & cheerful' lorry parks. The stretch of the M5 to the south of Birmingham which eventually joins with the M6 to the north of Birmingham is also in need of additional lorry parking supply given it contains a 30 mile stretch of road without a lorry park at an acceptable rate of utilisation. Although the A46 may incur less traffic volume than the M5, it is also likely that the 40 mile stretch of road along this route between Gloucester and Coventry without a lorry park at an acceptable utilisation is a driver of off-site parking which should be reconciled when possible through additional capacity.





### **Yorkshire and the Humber**

#### Nationally strategic road corridors

The key road corridors in the region of Yorkshire and the Humber include:

- The **A1** major north-south route which extends from the southern border of the region near Doncaster right up to the northern border of the region before continuing on to Newcastle.
- The **M1** this route is strategically important for the cities of Leeds and Sheffield and their connection to the East Midlands and the south of England.
- The **M62** This road corridor provides the primary east-west route for the region which links the Port of Hull in the east to Leeds before continuing on to Manchester in the North West.
- The **M180** this route also provides an east-west route in the region and links the Port of Grimsby and Immingham to the rest of the region.

#### Major freight generators and attractors

The two ports located in the east of the region, the Port of Hull as well as the Port of Grimsby and Immingham, are two major freight generators for the region however there are also large industrial precincts located in Leeds, Sheffield and Rotherham which are considered to be major freight generators for the region as well.

#### **Provision of lorry parking**

A total of 37 lorry parks were surveyed in region of Yorkshire and the Humber as part of the DfT survey of which 17 were either critically or seriously utilised (over 70%). A number of these highly utilised lorry parks are located on the M62 between the Port of Hull and Leeds with the M1, A1 and M180 also containing critically utilised lorry parks.

The region of Yorkshire and the Humber has one known 'high quality' (containing all facilities/amenities) lorry park which is located on the M62 to the east of Leeds which is critically utilised. There is also only one known 'cheap & cheerful' (under £5 per night) lorry park identified in the region which is located on the A1 to the south-east of Leeds.

#### Off-site lorry parking incurred

The main areas within the region of Yorkshire and the Humber which incur off-site parking are in the areas surrounding Leeds and Sheffield as well as the Port of Hull. Two industrial estates were identified to the south of Leeds which had over 30 lorries parked off-site in them each. To the north of the region, a number of lorries were also recorded in laybys around Scotch Corner which could be a result of resilience issues on the A66. Highways England Traffic Officers also reported a number of lorry parking issues on the A1 at regular intervals which indicates the more consistent and regular provision of lorry parks along this route should be encouraged.

#### Summary

This study has identified the areas to the south of Leeds as well as around Sheffield, Rotherham and the Port of Hull to be in need of additional lorry parking supply to reduce the level of off-site parking. There is a number of lorry parks to the south of Leeds which are currently at an acceptable level of utilisation, thus provision of any further capacity should be carried out strategically and aim to target specific segments of demand. The section of the M62 leading up to the Port of Hull does not have any lorry parks at an acceptable level of utilisation for approximately 30 miles which may also drive off-site parking near the Port. Additionally, it is also recommended that more regular and consistent provision of lorry parking facilities is provided on the A1 to aid the off-site parking issue identified by Highways England Traffic Officers.



# **Appendix B Local Authorities**



		Issue	No. Utilized I Pro	
Local Authority	Off-site parking (DfT 2017 Survey)	Off-site parking (TO's/Stakeholders)	High demand from ports	(Fully utilised/Total)
Amber Valley	$\checkmark$			1/2
Ashfield	$\checkmark$			1/2
Ashford	$\checkmark$	$\checkmark$	$\checkmark$	1/2
Babergh			$\checkmark$	0/0
Barnsley	$\checkmark$			1/2
Basildon	$\checkmark$			0/0
Basingstoke and Deane		$\checkmark$		2/2
Blaby	$\checkmark$			0/0
Bolsover	$\checkmark$			0/2
Brentwood	$\checkmark$		$\checkmark$	0/0
Bristol, City of		$\checkmark$	$\checkmark$	1/2
Bromsgrove	$\checkmark$	$\checkmark$	$\checkmark$	2/4
Broxtowe	$\checkmark$	$\checkmark$		1/1
Cambridge	$\checkmark$			0/0
Cannock Chase		$\checkmark$		0/0
Canterbury	$\checkmark$		$\checkmark$	1/2
Central Bedfordshire		$\checkmark$		0/2
Charnwood	$\checkmark$		$\checkmark$	0/1
Chelmsford	$\checkmark$		$\checkmark$	0/0
Cherwell	$\checkmark$			0/0
Cheshire West and Chester			$\checkmark$	0/0
Chorley	$\checkmark$			0/0
Colchester			$\checkmark$	0/0
County Durham	$\checkmark$	$\checkmark$	$\checkmark$	0/0
Coventry	$\checkmark$		$\checkmark$	0/0
Dacorum		$\checkmark$		1/2
Dartford	$\checkmark$		$\checkmark$	0/0
Daventry	$\checkmark$		$\checkmark$	1/1
Derby	$\checkmark$			1/1
Doncaster		$\checkmark$		0/0
Dover			$\checkmark$	1/2
East Cambridgeshire	$\checkmark$			0/2
East Hampshire			$\checkmark$	0/0
East Northamptonshire	$\checkmark$			0/0
East Riding of Yorkshire			$\checkmark$	1/1
Eastleigh	$\checkmark$		$\checkmark$	0/0
Erewash	$\checkmark$			1/1
Fareham	$\checkmark$		$\checkmark$	3/4
Forest Heath	$\checkmark$			0/0
Forest of Dean		$\checkmark$		1/1
Gateshead	$\checkmark$		$\checkmark$	3/5
Gravesham		$\checkmark$	$\checkmark$	0/0
Halton	$\checkmark$		$\checkmark$	0/1
Harborough	$\checkmark$		$\checkmark$	1/1
Harrogate		$\checkmark$		0/0
Hartlepool	✓			0/1



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Havant			<b>√</b>	0/0
Herefordshire, County of		✓		0/0
Hinckley and Bosworth	✓		✓	0/0
Huntingdonshire		$\checkmark$		0/2
Ipswich	✓		✓	1/1
Kettering	✓			1/1
Kingston upon Hull, City of			$\checkmark$	4/5
Knowsley	$\checkmark$		$\checkmark$	0/0
Leeds	$\checkmark$	$\checkmark$		1/1
Leicester	$\checkmark$			0/2
Liverpool	$\checkmark$			0/0
Maidstone	$\checkmark$	$\checkmark$		3/5
Malvern Hills		$\checkmark$	✓	0/0
Medway	✓	$\checkmark$	✓	1/3
Mid Suffolk	✓			0/0
Milton Keynes		$\checkmark$		3/3
Mole Valley		$\checkmark$		1/1
New Forest			✓	0/0
Newcastle Upon Tyne	$\checkmark$		✓	3/4
North East Lincolnshire			✓	1/2
North Lincolnshire			✓	0/0
North Somerset		$\checkmark$	✓	0/0
North Typeside	$\checkmark$		✓	1/1
North Warwickshire		$\checkmark$		0/0
North West Leicestershire	$\checkmark$			0/0
Northampton	✓			0/0
Nuneaton and Bedworth			✓	1/7
Oxford	$\checkmark$			0/0
Portsmouth	$\checkmark$		✓	1/1
Preston	$\checkmark$			2/3
Richmondshire		$\checkmark$		0/0
Rochdale		$\checkmark$		0/0
Rossendale		$\checkmark$		0/0
Rotherham	$\checkmark$	$\checkmark$		0/0
Rughy	$\checkmark$	$\checkmark$	✓	0/1
Rutland			√	1/1
Sedgemoor		$\checkmark$		0/2
Sefton	$\checkmark$		√	1/1
Sevenoaks	√		√	0/0
Sheffield	$\checkmark$			0/0
Shenway	$\checkmark$		√	0/1
Solibull			√	0/0
South Cambridgeshire	√	$\checkmark$		0/0
South Derbyshire	✓			0/1
South Gloucestershire		✓	✓	0/1
South Kesteven				0/1
South Northamotopshire	$\checkmark$	✓		0/0
South Pibblo	$\checkmark$			2/3
South Staffordebiro		$\checkmark$		0/2
	1	1		



Southampton	$\checkmark$			1/1
St Edmundsbury	$\checkmark$			0/0
St. Helens	$\checkmark$		$\checkmark$	0/0
Stafford		$\checkmark$		0/0
Stockton-on-tees	$\checkmark$			0/0
Stroud		$\checkmark$	$\checkmark$	1/2
Suffolk Coastal			$\checkmark$	5/5
Sunderland	$\checkmark$		$\checkmark$	0/0
Surrey Heath		$\checkmark$		3/3
Swale			$\checkmark$	1/2
Tameside		$\checkmark$		0/0
Tendring			$\checkmark$	0/0
Test Valley			$\checkmark$	1/3
Tewkesbury		$\checkmark$	✓	0/0
Thurrock	$\checkmark$	$\checkmark$	$\checkmark$	3/4
Tonbridge and Malling	$\checkmark$			0/1
Trafford		$\checkmark$		0/0
Uttlesford		$\checkmark$		1/2
Vale of White Horse	$\checkmark$			4/4
Wakefield	$\checkmark$	$\checkmark$		0/0
Warrington	$\checkmark$		$\checkmark$	1/2
Warwick			$\checkmark$	0/0
Wellingborough	$\checkmark$			0/0
West Lancashire			$\checkmark$	0/0
Wigan	$\checkmark$			0/1
Wiltshire		$\checkmark$		0/0
Winchester		$\checkmark$	✓	2/2
Wirral	$\checkmark$		✓	0/1
Wvchavon	$\checkmark$	$\checkmark$	$\checkmark$	2/2

# **Appendix C Stakeholders consulted**


# **Stakeholders Consulted**

Organisation	Name	Туре	
Ashford Truck Stop	Darren Smith	Lorry Park Provider	
C4T	Stuart Madden	Lorry Park Provider	
Certas Energy	Andrew Goodwin	Fuel Provider	
Certas Energy	Alex Wolfe	Fuel Provider	
Eddie Stobart	Nick Graham	Haulier	
FlowGas	James Goodson	Fuel Provider	
Freight Transport Association	Malcolm Bingham	Trade Body	
Highways England	John Henderson	Governmental Organisation	
Highways England	Kevin Bown	Governmental Organisation	
Highways England	Brian Williams	Governmental Organisation	
Highways England	Dave Lakin	Governmental Organisation	
Road Haulage Association	Chrys Rampley	Trade Body	
Welcome Break	Nick Jackson	Lorry Park Provider	

# **Appendix D Traffic Officer Responses**



Locations	Comment
SOUTH EAST	
Cobham Services, M25, J9-10 / J10-9	Services full every night. HGVS park up on HS before and after services and on entrance slips into services.
M3, A34, J9	Layby at 3/5 north. HGV parking on the mud or getting stuck just before the layby or blocking the layby as it's too small. 89371 is a Airsweb number due to us closing the A34 due to recovery need more room to pull a HGV out of the mud. Closed for 40 minutes in total just before rush hour.
M3	Fleet Services Both sides of Fleet services J, K slip and L,M slip. Park up on the hard shoulder so they don't have to pay for parking in the Service.
M3, J6-J7	Wide part of the hard shoulder between the bridge. Due to it being away from the main carriageway they park with lights off and stay for 9 hours. 82/0 on both sides.
Cobham, A2	Services on B always full and HS on A slide full with HGVs each night
Medway Services, M2, J4-5	Services full every night. HGVS park up on HS before and after services and on ramps
Maidstone Services, M20, J8	Services full every night. HGVs park on J8 slip roads every night
SOUTH WEST	
Leigh Delemare & Membury	M slip Entry from at Leigh Delemare services East bound and the K slip exit Westbound at Membury
Sedgemoor, M5	M5 Sedgemoor services North and South on the On slip road.
Taunton Deane North, M5	M5 Taunton Deane North on Slip
M5, J21	M5 J21 K slip onslip southbound occasionally and also there has been some on K and M slip on slip South and Onslip north at Junction 28.
General	Services slips when motorway services when either the truck stop is full or the driver doesn't want to pay to use the truck stop but wants the facilities.
Pucklechurch, M4, J18 to J19,	Pucklechurch proposed slips both directions on the M4 J18 to J19 and vice versa
M4, J 19	Hard standing areas (locally known as the bat cave) under Junction 19 M4 both east and west sides of the roundabout.
M4 / M5	ERA bays on the M4 / M5. Drivers (especially non UK nationals) are unaware that these are for emergency use only, not for taking breaks.
M4, Js 21+22	Extra wide areas of the hard shoulder between junctions 21+22 M4 in both directions.
M4, J 22	M4 Junction 22 abload bay and roundabout. Drivers use the abload bay and hardstanding areas from rest breaks even though there are motorway regulation signs on the entrance to the roundabout off the J and L slips.
M32, Js 2-1	Extra wide hard shoulder junctions 2-1 M32, drivers park on the hatch markings as one driver told me "well this isn't the hard shoulder".
Old Gloucester, M5, Js 12 – 13	Old Gloucester services proposed junctions 12 – 13 M5 in both directions
M5, J 10 and 11	Proposed junction slip road between 10 and 11 M5 in both directions.

AECOM	lmagine it. Delivered.
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M5, J 8	M5 Junction 8 abload bay.
M48 both directions, J 1 and the M4	in wider hardshoulder which is a parking area for the power towers that run over the motorway. They look like laybys to people often stop there, also Exit slip southbound from Michael wood services
General	All of the ERA bays in motorways with SMART running lanes normally for short tacho breaks
M5 K Slip onslip southbound, J20	
EAST OF ENGLAND	
Birchanger Green, MSA, M11, J8	During the week, the overnight truck parking is full to overflowing, with HGV's parking wherever they can within the service area.
Swavesey, MSA, A14, J28	During the week, the overnight truck parking is full to overflowing, with HGV's parking wherever they can within the service area, including all coach parking and into the car park.
Brampton Hut, MSA, A14, J21	During the week, the very limited overnight truck parking area, is full to overflowing.
Peterborough, MSA, A1M, J17	During the week, the overnight truck parking is full to overflowing.
M11	laybys near, are always filled with HGV's overnight.
A14 and A11	being APTR's, have numerous laybys, these are usually filled with HGV's overnight.
J 12-11, J12 /Toddington svs	Foreign Registered HGV Tacho break in ERA Bay
J 10-11, J 10/J 9 Truck Stop	Foreign Regestered HGV Tacho in ERA Bay
J 12- 13 , J 12/Toddington svs/J 13 Truck Stop	English Registered HGV Tacho in ERA Bay
J 13-14, J 13	Foreign Registered HGV Tacho Live Lane on slip road
Newport Pagnell SVS , J 15 Newport Pagnell svs J 14	English Registered HGV Tacho on Hatch Marking on slip road
J 13-12, J 13 Truck Stop	English Registered HGV Tacho in ERA Bay
EAST MIDLANDS	
Trowell Services, M1	Quite often there are LGV's parked on the hard shoulder on the entry slip as there isn't enough room for them to park in the services. This is the same for both the north and south bound service areas. This happens mostly during the day when the drivers stop for their 45 minute break rather than their overnight stop.
WEST MIDLANDS	
Frankley Services, M5A, M5B, J3	Exit slip roads on both carriageways are regularly used by HGVs for tacho breaks and overnight parking.
Stafford, A34, M6, J14	All lay-bys and industrial areas are full most weekday nights with HGV's
Cannock, A5, M6, J12	All lay-bys are full every night and both truck stops are full.



Stafford, A449, M6, J13	HGV parking under motorway bridge on roundabout an issue, local lay-bys fill quickly on night time.			
Stoke, A500, M6, J15	To due to lack of parking the only lay-by gets full very early.			
Cannock, A460, M6, J11	Due to volume of hgv traffic the one lay-by is always full causing HGV's to park on verges.			
Keele Services, M6, M6, J15- 16-15	Due to volume of HGV's parking both side get full very quick leading to them parking in car park and coach park.			
Hilton park, M6, M6, J10a-11	Due to lack of space on the northbound HGV park always get problems with HGV's taking breaks on the K slip out of Hilton Park, has been hard coned to prevent but just moved the problem further down hard shoulder towards J11.			
Rugby, A426, M6, J1	Lay-bys and near by industrial areas full of HGVs at nights and weekends			
Coventry, A4600, M6, J2	Lay-bys and near by industrial areas full of HGVs at nights and weekends			
Coventry, A444, M6, J3	Lay-bys and near by industrial areas full of HGVs at nights and weekends			
M5, J 6 Southbound Slip road	HGVs are parking up on the bottom of the slip road, just after the roadworks and cones leading onto the motorway southbound			
M5, J 8 Southbound Slip road	HGVs are resorting to parking up on the hard shoulder, just after the services (after the recently installed traffic management cones) on the slip road southbound			
M5, J 8 Wide load bay	At the bottom of Junction 8 there is a wide load bay in the middle of the roundabout leading onto the M50 motorway, HGVs are using this area to stopover.			
M5, J 7 North / South Overbridge	HGVs are exiting the motorway at Junction 7, and are parking up on the overbridge on the wide section of pavement either for Tacho breaks or overnight			
M42, J 2 Southbound Slip road	HGVs are parking up on the slip road, which is not suitable due to the very narrow hard shoulder, parking the wheels on the verge, carving it up and making it unsuitable			
M6, J1/2 & J2/1	LGV's use a wide section of hard shoulder as overnight parking.			
Corley Services (both directions), M6	LGV's regularly use the slip roads to avoid paying parking charges.			
M6, J9	LGV's park on side streets and in an adjacent retail park.			
M6, A500	lay bye's adjacent to J15 & J16,M6 are always full with overnight parking – no facilities leads to large amounts of litter and other waste etc.			
Frankley services, M5	slip roads often used for overnight parking			
M5, J6	LGV's park on top of the junction.			
M5, J8	hard shoulder between Strensham services and J8,M5 often full of LGV's parked overnight.			
M42, J6	LGV's park on the roadside in the adjacent distribution park (Starley Way). Aggressive clamping operation in place.			
M42, J9	LGV's park on the roadside when visiting the Hams Hall industrial area.			



STRENSHAM SERVICES, SOUTHBOUND, M5, J8	During the last two years, Strensham services southbound have being carrying out three phases of reconstruction and reorganisation of their building facilities, car & caravan parking areas and finally the HGV parking. The latter has not yet been completed but the existing area has been relined. Relining has made some of the spaces too tight to park in. I understand that part of the field at the rear of the HGV area has been leased/purchased to increase the HGV parking, but at present this has not come to fruition other than an access point has been opened in the hedge. This has meant insufficient parking area for those wishing to use it for overnight parking and the over-spill has led top HGVs parking on the hardshoulder exiting the services to J8, M5 (interchange with the M50 and subject to motorway regulations) and the abnormal load (AL) area on J8 roundabout. Consequently abnormal loads requiring to use their allocated area have regularly not been able to a) access the AL area; b) get fully into the AL area and therefore utilised the roundabout hardshoulder, sometimes forcing part of their vehicles to remain in live lane; and c) to get into the AL area but remain on the yellow markings of the safety zone at the start of the AL area. Regularly used by companies travelling south from the north as this is usually the extent of their 4.5 hour driving time. Some HGV drivers stopping for 45 mins breaks also do not use the services as the parking is too tight and there is not sufficient space – hence they will (and do) drive through the services to use the hardshoulder on the exit slip from the services. Also HGV drivers using the incorrect areas that I have spoken to have stated that their companies will not pay for overnight parking and the drivers are expected to use these facilities but pay for it out of their own pocket. Hence they will try and park where they do not have to pay. High overnight parking costs.
STRENSHAM SERVICES, NORTHBOUND, M5, J8	Large enough open space which has been white lined in the past but most HGV drivers using this know where to park their vehicles and generally do so comfortably. Regularly used by companies travelling north from the south as this is usually the extent of their 4.5 hour driving time and gives a good starting point for their onward journey. HGV drivers that I have spoken to have stated that their companies will not pay for overnight parking and the drivers are expected to use these facilities but pay for it out of their own pocket. Hence they will try and park where they do not have to pay. High overnight parking costs (£32 overnight with meal).
STRENSHAM, A38, M50, J1 STRENSHAM, A38, M50, J1 STRENS	
WORCESTER SOUTH, A44/ A4440, M5, J7	Overbridges at J7 and hardshoulders on the slips are regularly used for all breaks and comfort stops. HGV drivers have stated that coming from the Welsh borders/west on the A44 (Worcester Southern Link Road), there are insufficient places to stop for breaks or for comfort breaks with large vehicles, hence they are either "desperate" or have run out of driving time and require a tachograph break.
WORCESTER NORTH, A449/A44, M5, J6	Overbridges at J6 often used by HGVs (and cars attending rugby matches at Sixways (Worcester Warriors)). Very few parking areas in the vicinity for large vehicles, and only two laybys on A449 towards Kidderminster and retail parks on the north side of Worcester. Currently (Feb 2019), there are major restructuring works ongoing for J6 and further industrial parks being built on the east side (towards Evesham) of J6. Both the A449 and A44 are diversion routes suitable and used by HGVs, but with nowhere for them to take breaks.
DROITWICH SPA / WYCHBOLD, A38 NORTH, M5, J5	Privately owned truck stop on A38 northbound which is often used as a diversion route between M5 J5, M40 J1 and M5 J4. Very well used and full most nights. Good general service facilities for overnight breaks, but it does need expanding. Well known by HGVs drivers and only 1 mile from M5 J5. Knock-on effect is that HGVs are now using the Emergency Areas (EA) on the M5 ALR section between J4a and J6.
DROITWICH SPA, A38 SOUTH, M5, J5	Very few laybys for large vehicle parking. Access road for Berry Hill Industrial Estate where roadside parking available but limited. Drivers around this area are often looking for parking before running out of driving time, but cannot reach Strensham Services (M5 south) nor Frankley Services (M5 north) or Hopwood Services (M42 J2). Also route for access to Kidderminster and north side of Worcester. Knock-on effect is that HGVs are now using the Emergency Areas (EA) on the M5 ALR section between J4a and J6.
TEWKESBURY, A46, M5, J9	No HGV parking other than roadside in industrial estates either side of the J9 (Ashchurch Ind. Est. and Tewkesbury Ind. Est.). This is not ideal as insufficient space due to parking restrictions and the roads are in constant use day and night. Often used as alternative parking from Strensham Services southbound - timing is about 4.5 hour driving hours mark for a lot of HGV companies and no charge, but there are no welfare facilities other than a snack van (no toilet facilities).
TEWKESBURY/STRAFOR D-UPON-AVON, A46, M5/M40, J9/J15	A diversion route for large vehicles. Although there are laybys along this route, they are not lit and often have kerbing which is not clearly seen. HGVs however are more likely to be pushing to M5 J9 or M40 J15 as timings for tachograph breaks often do not coincide with this part of their journey.
TEWKESBURY (TEDDINGTON HANDS), A46, A435, (M5 J9)	At the Teddington Hands roundabout, there is a secure/gated truck stop which café and gate security. This appears to be a recent addition to the A46 route (in the last couple of years) but also is not as well advertised as it could be. I have yet to see this being used other than by the company that I believe has set this up (Gordon Gilder Logistics). There are few residences in the vicinity and it has easy access to the A46 for onward journey (suitable for HGVs) to M5 or M40.



ROSS-ON-WYE, A40, M50, J4	Ross Spur services are located at the end of the M50. There are no services on the M50. Ross Spur services are really a small vehicle service area, but do have about 12 parking spaces for HGVs. This is insufficient sometimes, but the only opportunity for some miles for large vehicles to stop. Large vehicles are regularly found using the narrow hardshoulders on the M50 for tachograph breaks when travelling eastbound. Westbound, large vehicles either go onto A40 for Gloucester, A40 for Monmouth/Wales, A49 for Hereford/Shrewsbury – all of which have little or no areas for large vehicles to stop. The A40 Gloucester is also a diversion route for when there are closures on the M50.
TEWSKESBURY to ROSS-ON-WYE, M50, All Js	The M50 has no facilities for HGV parking. It is 26 miles long but has Strensham Services at the M5 end and Ross Spur Services at the A40 end (towards Wales) – see comments above. At M50 J2, there is one layby which is well utilised by HGVS and has a daytime snack van. However this is on A417 towards Ledbury and there are few opportunities for HGVS to turn safely after using this layby unless they travel some distance towards Ledbury, so not ideal. In the past, M50 has been an alternative route to/from South Wales for those not wishing to pay bridge tolls and for an old motorway, it has considerable usage by large vehicles. This may be eased a little now by the removal of the bridge tolls on the Severn Bridges (M4/M48) Bristol area at the end of 2018, although it continues to be used as a diversion route for closures on the M4 at the bridges and by those travelling north from South Wales or when the bridges are shut. No real facilities along this route, and HGVs are found using the hardshoulder for tachograph breaks. HGV drivers I have stopped with have basically indicated that the M50 isn't a motorway, nor is it subject to motorway regulations, is not patrolled by Police or ourselves regularly and that they can stop on it. (Obviously I have disillusioned some of these drivers now!) As an old motorway, the hardshoulders are not continuous, narrow and do not necessarily have the soil sub-structure for constant static weight – something we have to bear in mind for any breakdown. HGVS can easily overhang into live lane along the M50.
NORTH EAST	
Woodall and Woolle	Woodall and Woolley regularly overflow with trucks using the hard shoulder on slip roads
M18, J1	The stock yard at hellaby is often full to capacity overnight with around 200 trucks farm land is adjacent to this which may be worth seeking out assistance or to put in a slip to truck services to ease traffic
M1	All the slips at Woodhall services M1
Sprotbrough	Sprotbrough depot slips
Ferrybridge/Darringt on	Wide load bays Ferrybridge/Darrington
A1M, J 36	K slips Jct 36 A1M
A1M, J 34	K slip Jct 34 A1M
M1, J 37	The long slip roads at Jct 37 M1
A1M, J 37	K slip Jct 37 A1M
Woodhall, M1	"M1, Woodhall Services lorry Parking isn't big enough. Many HGV's then opt to park on the slips."
M1, J31	"There are Lorry parks located nearby such as J31 but they are not very well sign posted"
A1(M), J37	"Lay-bys usually full J37 A1(M)"
A1(M), J34	"Blyth Services J34 A1(M) are not big enough for HGV's"
RAF Kirton Lindsey, M180	My initial thought for our area is towards my home area – the M180. RAF Kirton Lindsey – this is a now-unused RAF Base. Although abandoned it has recently been used by a private company to run a Zombie-paintball event using the old abandoned buildings there. Whether it is suitable for LGV standing/storage I wouldn't like to guess but it is an unused grass airfield.
Wetherby, A1M, J 46	Wetherby junction 46 A1M 'K' slip.
Ripon, A1M, J 50	Ripon junction 50 A1M 'M' slip.



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Borobridge, A1M, J 48	Borobridge junction 48 'M' slip and 'K' slip. (The 'K' slip is particularly concerning as the hard shoulder is so narrow they are in effect in live lane).		
Leeming Bar, A1M	Leeming Bar 'M' and 'K' slips.		
Barton, A1M, J 56	Barton junction 56 'K' slip.		
Wetherby, A1M, J 46	Wetherby junction 46 A1M 'K' slip.		
Ripon, A1M, J 50	Ripon junction 50 A1M 'M' slip.		
Borobridge, A1M, J 48	Borobridge junction 48 'M' slip and 'K' slip. (The 'K' slip is particularly concerning as the hard shoulder is so narrow they are in effect in live lane).		
Leeming Bar, A1M	Leeming Bar 'M' and 'K' slips.		
Barton, A1M, J 56	Barton junction 56 'K' slip.		
	Four of the above are junctions with service areas which cater for large goods vehicles so no excuse. Further to this these areas are plagued with litter.		
NORTH WEST (incl. YORSHIRE AND THE HUMB	ER		
Hyde, M67, M67	At the end of the M67there is a very wide hard shoulder LGV can be found parked up here at night and they tend to be foreign registered.		
Ramsbottom, A56, M66 J1	Lorry's parking up in the rest bays all night and taking all the room up.		
liddleton, M62 When Birch is full lorry's park overnight on the exit slip of the services once again these tend to be foreign registered.			
Manchester/ Milnrow, A627, M62, J.22	Too few lay-bys spaces		
Manchester/ Milnrow, M62 / Mp72.9, J.22/21, Wide area at the side of motorway, with no signs			
Hattersely / Manchester, M67 A/B, A560/ A6018, J.4	No lay-bys, so HGV park at wide area at side of motorway		
Birch / Manchester, M62 A/B, J.18/19	Not enough spaces within the services		
Slattocks / Manchester, A627M/K slip, A664, J.2 Not enough lay-bys within industrial est			

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Department for Work & Pensions



Department for Environment Food & Rural Affairs

To the UK Logistics Sector

We wish to begin by expressing our thanks to you, our road haulage key workers, who throughout this past 16 months have provided a vital service to the COVID-19 response, keeping food, medicine and other vital goods moving around the country. Your dedication and hard work is greatly appreciated.

The driver shortage is well documented and its impacts on the wider economy are becoming more evident. We know the challenges are serious and whilst it is for industry to lead, we are here to help. We have been urgently working across Government and with you on a package of measures to support recruitment and retention within the industry. We're pleased to set out the following actions that we are taking to tackle the shortage.

We know that increasing the availability of HGV driver testing is key. The Driver and Vehicle Standards Agency (DVSA) continue to develop measures to maximise testing capacity and tackle the backlog. DVSA has already increased throughput from 1,150 successful passes a week pre COVID to 1,500 by overtime and allocating additional staff into testing.

Further measures can sustain this increase and potentially raise it to 2,000 successful passes a week. The Department for Transport (DfT) will therefore consult about the delegation of the off-road manoeuvres as part of the Heavy Goods Vehicle driving test, which would increase overall testing capacity. DfT will also consult about issuing provisional licence entitlements to drive articulated lorries at the same time as issuing provisional licence entitlements to drive rigid lorries. This would allow candidates to move directly to taking articulated lorry tests, without also having to pass a rigid lorry practical test.

These are practical improvements which we think could speed up recruitment and we are seeking your views on them with a view to regulatory changes as early as possible this year. They would provide a more efficient testing process longer term and are examples of changes we could make with the increased sovereignty over our decision-making that Brexit has provided. We will also consider changes related to requirements for newer car licence holders to take extra tests to drive car/van and trailer combinations, with a view to consulting about removing this extra test requirement. This could also provide more testing capacity to be used for Heavy Goods Vehicle tests.

We know that the costs of training can be a barrier both to new entrants and business. A number of proposals to support the training of heavy goods vehicle drivers have been put forward. We wish to support the sector in overcoming barriers to people wishing to join this sector of the economy. We are reviewing the proposals for financial support made by industry sources to boost the supply of drivers.

We are already supporting lorry driving training in the context of apprenticeships. This includes the revised Large Goods Vehicle Driver apprenticeship standard, which will be available from 2 August. This new version will be supported by an increased funding band of £7,000, and further support on offer includes the Department for Education's current incentive payment to employers of £3,000 for every apprentice, of all ages, hired as a new employee from 1 April 2021 to 30 September 2021. A second proposed apprenticeship, Urban Driver, is currently being considered for future development and a further new standard, Transport and Warehouse Operations Supervisor, is also expected to launch in the coming months.

The Department for Work and Pensions (DWP) is supporting returning to driving and helping jobseekers become HGV drivers where appropriate. Increased communications to work coaches and to jobseekers are in progress. We continue to work with industry to collaborate on content that promotes working in the haulage sector for JobHelp, our virtual platform to advise and guide people looking for work. A DWP driver training pilot is underway, as part of the wider Road to Logistics scheme and we encourage industry to access their local jobcentre plus network.

Large numbers of EU nationals have settled status or pre-settled status in the UK and continue to be an important part of the lorry driving workforce. But for the future workforce we will need to develop people resident in the UK as opposed to specifically providing visas for this group of workers.

For the short term we have announced a relaxation to drivers' hours rules given the current urgent situation, this will provide haulage operators with increased flexibility to manage deliveries and alleviate some the pressures being experienced. We will be launching a short, targeted Call for Evidence to consider whether longer relaxations would be appropriate. This complements a relaxation of supermarket delivery hour restrictions to further support the industry. Work is also progressing on increasing collaboration in the food sector. While we focus on increasing the supply of drivers into the industry, any success in this area will need to be supplemented by action to improve retention of drivers. Here we seek to support industry-led action. We will reinvigorate work on lorry parking with trade and driver representatives with a view to working with businesses, Highways England and via planning to improve the quantity and quality of overnight facilities and access to facilities during the day.

We confirm support for an industry-led proposal for a Year of Logistics. We also confirm support for the promotion of good practice in the sector, envisaged by unions and trade representatives. We commend the International Road Transport Union's driver charter.

We know businesses are under severe pressure at the moment and adapting business models. It is going to be critical for the medium term that business practices change recognising the end of free movement, the need for more diversity on the workforce, how drivers are trained and pay and conditions for drivers. Market mechanisms will be the predominant way in which this shortage is resolved.

We appreciate the time and resource provided by parts of the industry in engaging with the government on these issues. We are committed to our officials together and with key other government departments meeting industry representatives, including Logistics UK, RHA and Unite on the labour shortage issues during the coming weeks.



**Rt Hon Grant Shapps MP** 

SECRETARY OF STATE FOR TRANSPORT Rt Hon Thérèse Coffey MP

SECRETARY OF STATE FOR WORK AND PENSIONS **Rt Hon George Eustice MP** 

SECRETARY OF STATE FOR ENVIRONMENT FOOD AND RURAL AFFAIRS



#### **Department for Transport**

Great Minster House 33 Horseferry Road London SW1P 4DR

Website:

www.gov.uk/dft

Date:

Dear Sir/Madam,

#### HGV Driver Shortage – Employment Opportunities

We are writing to you, and all HGV driving licence holders, about the national shortage of HGV drivers. As you are undoubtedly aware, this has been putting pressure on UK supply chains for some time. The Government and the logistics sectors are working on a range of solutions to ease the shortage.

To those of you who are currently driving, we would like to thank you for the vital service you have provided during the COVID-19 response and the incredibly important role you continue to play in keeping goods moving around the country.

If you are no longer working in this sector, we would like to take this opportunity to ask you to consider returning. Your valuable skills and experience have never been more needed than they are now.

There are fantastic HGV driving opportunities in the logistics industry and conditions of employment and pay have been improving across the sector. As well as attractive pay rates, we are seeing more options for flexible working, fixed hours, fixed days, full-time and part-time.

Many employers are offering training packages so even if your Driver CPC has lapsed, you can be supported in updating this through classroom or online courses. Furthermore, given the significant number of opportunities available, driving can become an entry point into a much wider pool of job roles.

Businesses of all sizes, in many different sectors, including specialist operators, are looking for drivers. There has never been a better time to find the type of HGV driving job you want.

If you would like to find out more, please visit: Logistics UK – https://logistics.org.uk/skills RHA – www.rha.uk.net/backtodriving

We look forward to hearing from you.

Baroness Vere of Norbiton Minister for roads, buses and places



David Wells Chief Executive



Richard Burnett Chief Executive



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News story

# More support to help people to become HGV drivers among package of government measures to ease risk of shortages

Government taking action to tackle the shortage of HGV drivers.

From:

Department for Transport (https://www.gov.uk/government/organisations/department-for-transport), Driver and Vehicle Standards Agency (https://www.gov.uk/government/organisations/department-for-education), Department for Education (https://www.gov.uk/government/organisations/department-for-education), Department for Environment, Food & Rural Affairs (https://www.gov.uk/government/organisations/department-for-education/department-for-education/department-for-education/department-for-environment-food-rural-affairs), Ministry of Defence (https://www.gov.uk/government/organisations/diver-and-defence), Driver and Vehicle Licensing Agency (https://www.gov.uk/government/organisations/driver-and-vehicle-licensing-agency), and UK Visas and Immigration (https://www.gov.uk/government/organisations/uk-visas-and-immigration)

#### Published

25 September 2021



- Up to 4,000 people will be trained as new HGV drivers to help tackle skills shortages and support more people to launch careers within the logistics sector.
- Package of measures includes using MOD examiners to help increase immediate HGV testing capacity by thousands over the next 12 weeks.

- Nearly 1 million letters to be sent to all drivers who currently hold an HGV driving licence, encouraging them back into the industry.
- 5,000 HGV drivers and 5,500 poultry workers added to existing visa scheme until Christmas 2021 to ease supply chain pressures in food and haulage industries during exceptional circumstances this year.

Up to 4,000 people will soon be able to take advantage of training courses to become HGV drivers, as part of a package of measures announced today (25 September 2021) by the government to ease temporary supply chain pressures in food haulage industries, brought on by the pandemic and the global economy rebounding around the world.

The Department for Education is investing up to £10 million to create new skills bootcamps to train up to 3,000 more people to become HGV drivers. The free, short, intensive courses will train drivers to be road ready and gain a category C or category C&E licence, helping to tackle the current HGV driver shortage. An additional 1,000 people are expected to be trained through courses accessed locally and funded by the government's adult education budget.

Fuel tanker drivers need additional safety qualifications, which the government will work with industry to ensure drivers can access as quickly as possible.

To help make sure new drivers can be road ready as quickly as possible, the Department for Transport (DfT) have also agreed to work with Driver and Vehicles Standards Agency (DVSA) to ensure that tests will be available for participants who have completed training courses as soon as possible.

The Ministry of Defence (MOD) is also announcing today the immediate deployment of their Defence Driving Examiners (DDEs) to increase the country's testing capacity. MOD examiners will work alongside DVSA examiners, providing thousands of extra tests over the next 12 weeks.

The package comes as the DfT, along with leading logistics organisations have worked with the DVLA to send nearly 1 million letters to thank HGV drivers for their vital role supporting our economy (https://www.gov.uk/government/publications/hgv-driver-shortage-employment-opportunities), and to encourage those who have left the industry to return. The letter, which will arrive on doormats over the coming days, sets out that the steps the road haulage sector is taking to improve the industry, including increased wages, flexible working and fixed hours.

Alongside this, 5,000 HGV drivers will be able to come to the UK for 3 months in the run-up to Christmas, providing short-term relief for the haulage industry. A further 5,500 visas for poultry workers will also be made available for the same short period, to avoid any potential further pressures on the food industry during this exceptional period.

Recruitment for additional short-term HGV drivers and poultry workers will begin in October and these visas will be valid until 24 December 2021. UK Visas and Immigration (UKVI) are preparing to process the required visa applications, once made, in a timely manner.

However, we want to see employers make long term investments in the UK domestic workforce instead of relying on overseas labour to build a high-wage, high-skill economy.

Visas will not be the long term solution, and reform within the industry is vital. That's why the government continues to support the industry in solving this issue in the long term through improved testing and hiring, with better pay, working conditions and diversity.

Transport Secretary Grant Shapps said:

This package of measures builds on the important work we have already done to ease this global crisis in the UK, and this government continues to do everything we can to help the haulage and food industries contend with the HGV driver shortage.

We are acting now but the industries must also play their part with working conditions continuing to improve and the deserved salary increases continuing to be maintained in order for companies to retain new drivers.

After a very difficult 18 months, I know how important this Christmas is for all of us and that's why we're taking these steps at the earliest opportunity to ensure preparations remain on track.

Separately, the government is also bringing in legislation to allow delegated driving examiners at the three emergency services and the MOD to be able to conduct driving tests for one another. This will give the emergency services greater flexibility and help increase the number of tests DVSA examiners can provide HGV examiners.

The government will also provide funding for both medical and HGV licences for any adult who completes an HGV driving qualification accessed through the Adult Education Budget in academic year 2021/22. Previously, adults who took these qualifications had to pay for their own licences. This change will be backdated and applied to anyone who started one of these qualifications on or after August 1st 2021.

Education Secretary Nadhim Zahawi said:

HGV drivers keep this country running. We are taking action to tackle the shortage of drivers by removing barriers to help more people to launch new well-paid careers in the industry, supporting thousands to get the training they need to be road ready.

As we build back from the pandemic we're committed to supporting people, no matter their background, to get the skills and training they need to get good jobs at any stage of their lives, while creating the talent pipeline businesses need for the future.

Environment Secretary George Eustice said:

It is a top priority to ensure that there are enough workers across the country's supply chains to make sure they remain strong and resilient.

We have listened to concerns from the sector and we are acting to alleviate what is a very tight labour market.

The government has been able to bring forward these solutions in response to a global issue made worse by coronavirus thanks to our existing work in this area. We have already taken a range of steps to support the industry, including streamlining the process for new HGV drivers and increasing the number of driving tests. Our measures provided a rapid increase in capacity and allow for an extra 50,000 tests to take place per year.

Progress has already been made in testing and hiring, with improving pay, working conditions and diversity. We continue to closely monitor labour supply and work with sector leaders to understand how we can best ease particular pinch points. Through our Plan for Jobs we're helping people across the UK retrain, build new skills and get back into work.

The Food and Drink Federation's Chief Executive, Ian Wright CBE, said:

We welcome the government's pragmatic decision to temporarily add HGV drivers and poultry workers to the existing visa scheme.

This is something UK food and drink manufacturers have asked for over the last few months - including in industry's Grant Thornton report - to alleviate some of the pressure labour shortages have placed on the food supply chain.

This is a start but we need the government to continue to collaborate with industry and seek additional long term solutions.

Elizabeth de Jong, Logistics UK's Director of Policy, said:

Logistics UK welcomes the government package of measures aimed at improving the ongoing driver crisis. The government's decision to grant 5,000 temporary visas for HGV drivers to help in the short term is a huge step forward; we are so pleased the government has listened to our calls and has made this bold decision to support the UK economy. We are also delighted that DfT have agreed to jointly send nearly 1 million letters to all drivers who currently hold an HGV driving licence. With fantastic HGV driving opportunities available in the logistics industry, now is the perfect time to consider returning to the occupation.

Published 25 September 2021

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- Road freight (https://www.gov.uk/transport/road-freight)

# **Topical events**

• HGV driver shortage: UK government response (https://www.gov.uk/government/topical-events/hgvdriver-shortage-uk-government-response)

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# **Appeal Decision**

Site visit made on 10 July 2018

#### by M Aqbal BA (Hons) DipTP MRTPI

#### an Inspector appointed by the Secretary of State

#### Decision date: 22 October 2018

#### Appeal Ref: APP/R3705/W/17/3192501 Welcome Break Motorway Services, Smorrall Lane, Corley CV7 8NR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Welcome Break Group Limited against the decision of North Warwickshire Borough Council.
- The application Ref PAP/2017/0104, dated 28 February 2017, was refused by notice dated 7 November 2017.
- The development proposed is change of use of land to HGV parking incorporating associated infrastructure and works.

#### Decision

 The appeal is allowed and planning permission is granted for change of use of land to HGV parking incorporating associated infrastructure and works at Welcome Break Motorway Services, Smorrall Lane, Corley CV7 8NR, in accordance with the terms of the application, Ref PAP/2017/0104, dated 28 February 2017, and subject to the schedule of conditions to this decision.

#### **Procedural Matter**

2. Since the determination of the application, on 24 July 2018 the Government published a new National Planning Policy Framework (the Framework). The main parties have been given an opportunity to comment on the appeal in light of this. I have taken account of any comments received and considered this appeal in light of the new Framework.

#### **Main Issues**

3. The main issues are:

i) Whether or not the proposal would be inappropriate development in the Green Belt in terms of the Framework and development plan policy;

ii) The effect of the development on the openness and purposes of the Green Belt;

iii) If the proposal would be inappropriate development whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify it.

## Reasons

#### Background

- 4. The appeal site comprises some 2 hectares of grazing land to the south-east of the northbound section of the Corley Motorway Services Area (MSA), which is located along the M6 motorway. Beyond the southern boundary of Corley MSA, the area including the appeal site is largely countryside, with the exception of some ribbon development along Bennetts Road North, further south of the appeal site. The appeal site is located within the Green Belt.
- 5. The proposed scheme would provide an additional Heavy Goods Vehicle (HGV) parking area and associated infrastructure to serve Corley MSA. Access into and egress from the appeal site would be via the existing internal road network serving the MSA. The scheme also proposes floodlighting to the parking area and fencing/bunds along its perimeter. Surface water drainage would be to a new balancing pond.

#### Inappropriate development in the Green Belt

- 6. In refusing the application the Council has referred to Policy NW3 of the North Warwickshire Core Strategy 2014 (CS). This is a strategic policy which does not directly deal with the management of development in the Green Belt. Consequently, in determining this appeal I have had specific regard to the Green Belt provisions of the Framework.
- 7. Paragraph 146 of the Framework sets out certain development types which may not be inappropriate development in the Green Belt. These include engineering operations, local transport infrastructure and material changes in the use of land. However, these exceptions only apply where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. For the reasons I explain below, that is not the case in this instance. Accordingly, and since none of the other exceptions listed in the Framework apply in this case, the appeal scheme would be inappropriate development in the Green Belt.

## Effect on the openness and purposes of the Green Belt

- 8. As set out under Paragraph 133 of the Framework the essential characteristics of Green Belts are their openness and their permanence.
- 9. Openness has a visual and spatial dimension. In this case the appeal site is visually contained by a combination of existing boundary treatments, which would be augmented by additional new planting. These would to a large extent screen the new development, including the parked vehicles. Therefore, the visual impact of the proposed development on the Green Belt would be limited.
- 10. There are electricity pylons nearby, along with the buildings and infrastructure associated with the Corley MSA, and the M6 Motorway. Despite this extent of urbanisation, the appeal site is absent of any significant development. Consequently, the parking of large vehicles over a sizeable part of the appeal site would introduce a degree of spatial encroachment, which would erode its openness. In this case however, because of the transient nature of vehicles using the site the effect on openness would be less permanent. I therefore attach moderate weight to this effect on openness.

11. Development at the appeal site would result in an area of grazing land being developed upon and encroachment into the countryside. This would therefore conflict with one of the purposes for including land within the Green Belt. This is a further aspect of Green Belt harm.

#### Other considerations

- 12. The Framework advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. It is stated that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 13. In this case the appeal scheme is predicated on the need for additional HGV parking spaces at Corley MSA, due to a number of factors. These include the overall growth in HGV traffic nationally and regionally, allied with the need to accommodate this. The evidence in the appellant's submissions supports this, to which I attach moderate weight.
- 14. Moreover, site specific reasons for additional HGV parking at Corley MSA have been advanced. At present Corley MSA has 60 standard HGV spaces plus 4 available spaces in the long load bay. Based on average traffic flows passing the site the existing level of parking provision falls short of the near 100 spaces required, in accordance with government policy advice<sup>1</sup>. I attach substantial weight to this.
- 15. The appellant's evidence also confirms that the amount of HGVs travelling along the M6 is more than other motorways, and in particular the level of HGV traffic using Corley MSA is proportionally greater than other nearby MSAs. This is due to the location of Corley MSA along the M6, prior to the distribution of traffic onto other motorways. Consequently, it is at a key location where drivers take breaks. This is particularly significant, given that HGV drivers operate within legal driving times, and their stopping times are prescribed. In addition, drivers also need safe and secure facilities which Corley MSA provides. Moreover, the proposed HGV parking area would be close to the Strategic Road Network (SRN). In-line with government policy advice such facilities are more accessible to road users, and as a result, encourage drivers to stop and take a break. The letter from the Road Haulage Association also supports additional parking for site specific reasons at Corley MSA.
- 16. The appellant's Transport Assessment identifies that there is additional need for HGV parking arising from the high level of HGVs accessing but being unable to park at Corley MSA. At present, when the existing HGV parking area reaches 80% capacity, which occurs during the day and the night, drivers find alternative places to park resulting in unauthorised parking within the site, which causes hazardous incidents and environmental damage. On the other hand, some HGVs circulate the site and leave being unable to find space to park. This can be up to 70 HGVs in a night, which leads to parking on the egress slip road to the site, the hard shoulder, and also the refuge bays on the motorway. These activities raise safety concerns.
- 17. I acknowledge that some of the above incidents could be reduced by management and enforcement. Nevertheless, this would not address the cause

<sup>&</sup>lt;sup>1</sup> DfT Circular 02/2013 - Strategic road network and the delivery of sustainable development

of these problems, which is the under provision of HGV parking. Highways England (HE) who are responsible for managing and maintaining the (SRN) in addition to not objecting to the appellant's proposals, also suggest that they may well offer safety benefits by reducing the likelihood of hazardous HGV parking and driver tiredness. It has also been suggested that unauthorised HGV parking is a consequence of driver's unwilling to pay for authorised parking. However, I have limited evidence to support this.

- 18. From the information before me the appellant has considered utilising the existing areas within Corley MSA more efficiently to increase HGV parking spaces. Whilst an option exists for creating some additional HGV parking at Corley MSA, this has been discounted for highway safety reasons in the opinion of the appellant's transport consultants. This would also limit the option for creating additional parking at the appeal site in combination with a smaller new parking area. The appellant has also reviewed two alternative parking schemes submitted by third parties and highlighted their shortcomings.
- 19. For the above reasons, I am satisfied that the appellant has made reasonable endeavours in respect of considering alternative HGV parking arrangements. I also understand that the Council is commissioning a Borough wide survey in relation to HGV parking. However, as the findings of this are not before me at the time of deciding this appeal, I attach no weight to it.
- 20. The proposed requirement for the additional HGV parking spaces is based on the present and future HGV parking needs of Corley MSA, along with the number of vehicles not being able to park and leaving the site. In the absence of any strong technical evidence to the contrary, I accept the appellant's justification for the proposed level of HGV parking spaces. I also note that the Council has not disputed the site-specific shortfall of HGV parking spaces at Corley MSA.
- 21. Furthermore, Paragraph 107 of the Framework says that planning decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. In light of this and for the above reasons, I attach considerable weight to the site specific requirement to provide additional HGV parking at Corley MSA.
- 22. A new MSA at Junction 1, M6 (Rugby) has been approved. However, from the limited information I have in respect of this, its associated requirement for HGV parking spaces is based on the need along that particular part of the motorway and area. In any event, I have no strong evidence to demonstrate that the MSA at Rugby undermines the appellant's detailed case for the proposed additional HGV parking at the appeal site. As such, I attach limited weight to this in the overall balance.
- 23. The appellant and third parties have referred me to other HGV parking facilities in the area, in support of their respective cases. Nevertheless, given my findings in respect of the specific shortfall and need for HGV parking at Corley MSA, I attach limited weight to such facilities.

#### Other Matters

24. I have noted concerns raised by third parties in respect of future buildings being provided on the appeal site for driver facilities. However, the appellant

has confirmed that HGV drivers using the proposed parking area would utilise the existing facilities. Moreover, any future proposals for development would have to be considered on their merits.

- 25. Other environmental concerns have also been raised by third parties. Based on the evidence submitted by the appellant and in the absence of any technical evidence to the contrary, I am satisfied that the proposed development would not have any significant impact in respects of noise, light or emission pollution on the living conditions of nearby neighbours. Nor would it cause significant harm to matters of bio-diversity, wildlife and the local water environment, subject to conditions.
- 26. The submitted scheme is accompanied by a Road Safety Audit and there are no objections from Warwickshire County Council Highways or Highways England. I am therefore satisfied that the proposal raises no specific highway safety issues.
- 27. I acknowledge that the appeal site acts as part of a buffer between the Corley MSA and dwellings along Bennetts Road North and that the development would encroach into part of this. However, a certain buffer area would still be retained and a large extent of the proposed development would be screened by the existing and proposed landscaping. Some distant views of the appeal site from the dwellings along Bennetts Road North would be possible. Nevertheless such distant views would not result in any appreciable harm to outlook.
- 28. In the absence of any strong evidence, I am not persuaded that the security of nearby neighbours would be compromised by the proposed development. The issue of impact on property values has also been raised. It is a well-founded principle that the planning system does not exist to protect private interests such as value of land or property.
- 29. I have determined the appeal proposal on its merits. As such, the refusal of a previous application<sup>2</sup> for a smaller HGV parking area in a similar location to the appeal site does not alter my findings on the main issues.
- 30. Concerns relating to the lack of maintenance and protection of existing landscaping, littering and inappropriate use of adjacent areas in association with the Corley MSA site are separate to the determination of this appeal.
- 31. There is a possibility of an existing public footpath which crosses the appeal site being diverted. However, I have limited details in respect of this. In any event the grant of planning permission does not of itself authorise any obstruction of a public footpath and any diversion of it would be dealt with through a separate process.

#### The Green Belt balance

- 32. The development would constitute inappropriate development and conflict with the purposes of including land within the Green Belt. Moreover, it harms the Green Belt by way of loss of openness. The Framework requires substantial weight to be given to any harm to the Green Belt.
- 33. Having considered all other considerations in support of the development, in particular the under provision of HGV parking at Corley MSA and the strong

<sup>&</sup>lt;sup>2</sup> PAP/2008/0658 – Proposed extension to Motorway Service Area to create additional HGV parking facilities including amenity block and associated landscape proposals.

demand for HGV parking at this particular location. I find that the other considerations in this case clearly outweigh the harm that I have identified. Looking at the case as a whole, I consider that very special circumstances exist which justify the development. Therefore the proposed development does not conflict the Green Belt provisions of the Framework.

## Conditions

- 34. I have considered the conditions put forward by the Council in the light of the requirements of the national Planning Practice Guidance and the Framework. In addition to the standard timescale condition, I have imposed a condition specifying the relevant drawings and plans as this provides certainty.
- 35. Conditions relating to landscaping and trees are necessary in the interests of the appearance of the area. Conditions relating to the proposed fencing and bunds, the Management Plan for the HGV parking area, its hours of use, lighting and control over its construction are all necessary in the interests of the living conditions of neighbours. Conditions 3 and 4 are necessary in the interests of flood risk and drainage. A condition requiring Biodiversity Offsetting measures is necessary in the interests of biodiversity enhancements. Condition 6 is necessary to safeguard any archaeological interests of the site. Where needed, and in the interests of clarity and precision, I have altered the suggested conditions to better reflect the relevant guidance.
- 36. Conditions 4, 5, 6 and 7, which prevent any development approved by the planning permission from commencing until they have been complied with, are considered fundamental to the development hereby approved. It is necessary for them to take the form of 'pre-commencement' conditions in order to have their intended effect.

## Conclusion

37. For the reasons given above, I conclude that the appeal is allowed.

М Aqbal

INSPECTOR

#### SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans and documents: CMSA-BWB-GEN-XX-DR-TR-107 S2 REV P1; CMSA-BWB-GEN-XX-DR-TR-106 S2 REV P1; CMSA-BWB-HLG-XX-M2-C-1300 S8 REV P1; Landscape and Visual Impact Appraisal Doc ref NO. 1735-17-RP01 dated 24 February 2017, including the Appendices with Landscape Mitigation Plan - 1735-17-03B and Illustrative Landscape Sections plan - 1735-17-04, received 1 March 2017, to CMSA-BWB-HGR-XX-DR-EN-202 S2 REV P1; CMSA-BWB-GEN-XX-RP-TR-0002\_RSA1-DTR (Road Safety Audit Stage 1); CMSA-BWB-GEN-XX-RP-TR-0001\_RSA1- (Road Safety Audit Stage 1); CMSA-BWB-HGR-XX-DR-EN-201-S2 REV P2 (Surface water strategy) ; CMSA-BWB-HGR-XX-DR-EN-202-S2 REV P1 (Pond Cross Section), received 31 May 2017, and to CMSA-BWB-GEN-XX-DR-TR-105 S2 REV S2; CMSA-BWB-GEN-XX-DR-TR-110 S2 REV P2, received 4 August 2017 and Proposed HGV Parking Extension Lighting Layout – CMSA-BWB-HLG-XX-M2-C300 S8 REV P1.
- 3) The development hereby approved shall be carried out in accordance with the approved Flood Risk Assessment (FRA) CMSA-BWB-EWE-XX-RP-EN-0001\_FRA, Sustainable Drainage Statement CMSA-BWB-HDG-XX-RP-RP-0002\_SDS, and Surface Water Strategy CMSA- BWB-HGR-XX-DR-EN-201\_Surface Water Strategy. In particular the development should be carried out according to the following mitigation measures detailed: - Limit the discharge rate generated by all rainfall events up to and including the 100 year plus 40% (allowance for climate change) critical rain storm to 6.6 l/s for the site.

- Provide provision of surface water attenuation storage as stated within the FRA of 749m3 and/ or in accordance with 'Science Report SC030219 Rainfall Management for Developments'. The storage pond should be designed in accordance with plan CMSA-BWB-HGR-XX-DR-202\_Pond Cross Sections.

- Surface water is to be provided via a minimum of two trains of treatment using the proposed above ground drainage features within the drainage design.

The mitigation measures shall be fully implemented prior to use of the development and subsequently in accordance with the timing and phasing arrangements embodied within the scheme.

4) The development hereby approved shall not take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Local Lead Flood Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme to be submitted shall include: - Infiltration testing in accordance with the BRE 365 guidance to clarify whether or not an infiltration type drainage strategy is an appropriate means of managing the surface water runoff from the site.

- Provide a plan for the management of exceedance flows, including routings.

- Demonstrate detailed design (plans, network details and calculations) in support of any surface water drainage scheme, including levels, gully locations and outfall arrangements. Calculations should demonstrate the performance of the designed system for a range of return periods and storm durations inclusive of the 1 in 1 year, 1 in 2 year, 1 in 30 year, 1 in 100 year and 1 in 100 year plus climate change return periods.

- Provide and implement a maintenance plan to the local planning authority giving details on how surface water systems shall be maintained and managed for the life time of the development. The name of the party responsible, including contact name and details shall be provided to the local planning authority.

- 5) The development hereby approved shall not commence until details of the earth bunds and acoustic close board type fence as shown as part of the Landscape and Visual Impact Appraisal Doc ref NO. 1735-17-RP01 dated 24 February 2017, including the Appendices with Landscape Mitigation Plan - 1735-17-03B and Illustrative Landscape Sections plan -1735-17-04, received 1 March 2017 have been submitted to and approved in writing by the local planning authority. Thereafter the approved earth bund and acoustic fence shall be implemented before the development is brought into use and retained for the life of the development.
- The development hereby approved shall not commence until:

   a) a Written Scheme of Investigation (WSI) for a programme of archaeological evaluative work shall be submitted to and approved in writing by the local planning authority.

b) the programme of archaeological evaluative work and associated postexcavation analysis, report production and archive deposition detailed within the approved WSI shall be undertaken. A report detailing the results of this fieldwork shall be submitted to the planning authority. c) An Archaeological Mitigation Strategy document (including a Written Scheme of Investigation for any archaeological fieldwork proposed) shall be submitted to and approved in writing by the local planning authority. This should detail a strategy to mitigate the archaeological impact of the proposed development and should be informed by the results of the archaeological evaluation.

The development, and any archaeological fieldwork post-excavation analysis, publication of results and archive deposition detailed in the Mitigation Strategy document, shall be undertaken in accordance with the approved Mitigation Strategy document.

7) The development hereby approved shall not commence until a Tree Survey to fully assess the trees that are firstly upon the site and secondly those that will be affected by the development of the site as per the specifications provided with the submitted application has been submitted to and approved in writing by the local planning authority. The survey should be undertaken in accordance with BS5837:2012 Trees in relation to design, demolition and construction – Recommendations. Thereafter the development shall be undertaken in accordance with the approved survey details.

- 8) The development hereby approved shall not be brought into use until a biodiversity offsetting scheme shall be submitted to and approved in writing by the local planning authority. The Biodiversity Offsetting scheme shall provide appropriate compensation for a Biodiversity Impact Assessment score of 0.57 Biodiversity Units. The scheme shall be sited on land owned by the applicant adjacent to the Corley Motorway Service Station. The approved scheme shall be implemented in the next available planting season and maintained in accordance with the approved written scheme.
- 9) The development hereby approved shall not be brought into use until a Management Plan has been submitted to and approved in writing by the local planning authority. The Management Plan shall control the operation of the approved HGV parking area and specifically include measures to address the following matters:
  - Achieving and maintaining the 'Park Mark' safer parking award standard as assessed by Warwickshire Police in respect of the security of the parking area;
  - ii) Measures to ensure that the approved HGV parking area is closed between 1800 hours on Friday evening and 0800 hours on the following Monday morning;
  - iii) Use of floodlighting;
  - iv) Details of the proposed CCTV and how this will be monitored;
  - v) Access for emergency vehicles;
  - vi) Measures and timetable for the remarking of the existing HGV parking area on the northbound side of Corley MSA.
  - vii) A contact for complaints or concerns about the use and operation of the HGV parking area to be reported to.
- 10) The development hereby approved shall not be brought into use until a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, have been submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved.
- 11) All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the completion of the development; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
- 12) The HGV parking area hereby approved shall only be open for use between 0800 hours on Monday until 1800 hours on Friday and not at any other time.
- 13) The lighting scheme shall only be controlled by light sensors and the lighting shall be directed downwards at all times.

14) Construction works associated with the development hereby approved shall take place only between 0700 and 1900 on Monday to Friday, 0800 and 1300 on Saturdays and shall not take place at any time on Sundays or on Bank or Public Holidays.



Change of use of land to HGV parking incorporating associated infrastructure and works

#### Applicant

Welcome Break Group Ltd

Your planning application was valid on 9 March 2017. It has now been considered by the Council. I can inform you that:

Planning permission is **REFUSED** for the following reason:

1. The proposal represents inappropriate development within the Green Belt. It is considered that this causes significant harm, and that as such the considerations put forward by the applicant do not amount to the very special circumstances to clearly outweigh this harm. The proposal does not therefore accord with Policy NW3 of the North Warwickshire Core Strategy 2014 or with Section 9 of the National Planning Policy Framework 2012.

#### APPEALS TO THE SECRETARY OF STATE

(1) If you are aggrieved by the decision of the Local Planning Authority, you can appeal to the Department for Communities and Local Government under Section 78 of the Town and Country Planning Act 1990.
(2) If you want to appeal against your local planning authority's decision, then you must do so within 6 months of the date of this notice.

(3) Appeals must be made using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN, or online at www.planning-inspectorate.gov.uk and www.planningportal.gov.uk/pcs.

Authorised Officer:			A.	
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PAP/2017/0104

(4) The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

(5) The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

(6) The Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based their decision on a direction given by him.

#### NOTES

- 1. This decision is for the purposes of the Town and Country Planning Act only. It is not a decision under Building Regulations or any other statutory provision. Separate applications may be required.
- 2. A report has been prepared that details more fully the matters that have been taken into account
- when reaching this decision. You can view a copy on the Council's web site via the Planning Application Search pages <u>http://www.northwarks.gov.uk/planning</u>. It will be described as 'Decision Notice and Application File'. Alternatively, you can view it by calling into the Council's Reception during normal opening hours (up to date details of the Council's opening hours can be found on our web site <u>http://www.northwarks.gov.uk/contact</u>).
- 3. Plans and information accompanying this decision notice can be viewed online at our website <a href="http://www.northwarks.gov.uk/planning">http://www.northwarks.gov.uk/planning</a>.

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# 'Disgusting' lorry drivers using Tamworth area as 'overnight truck stop and toilet'

Council is working with developers to see what can be done.

birmingham mail



Lorry drivers are using Ventura Park Road as 'overnight truck stop and toilet'.

A new homeowner says she has "never seen such brazen disgusting behaviour in my life" after witnessing a lorry driver urinate along a popular dog walking spot.

The local resident, who did not want to be named, said several lorry drivers park up along Ventura Park Road in <u>Tamworth</u> overnight near to Barratt Homes' Dunstall Park development and are using the area as an 'overnight truck stop and toilet'.

She added "it is only a matter of time before there is going to be a serious accident".

**Staffordshire County Council** has told **BirminghamLive** it is aware of the issue and is working with developers to see what can be done. The developers added they are looking to solve this "as a matter of urgency."

The homeowner said: "I have never seen such brazen disgusting behaviour in my life. I am a new homeowner at Dunstall Park having moved into a house three weeks ago from Herefordshire.

"On Saturday morning, April 17 at around 11am, I was shocked and horrified by what I saw from my bedroom window looking along Ventura Park Road towards the Toyota garage.

"The driver of a large lorry, which had been parked there overnight, got out of his cab and left his door open wide, while bold as brass he crossed the road and walked up onto the grass verge pathway where people walk their dogs and stood and urinated. He didn't even go towards the hedge to do so!

"This behaviour is absolutely disgusting particularly as approximately five minutes later a young lady along with her two small children and their dog walked right across the path where he had urinated.

"I wish I had taken a photograph however I was so shocked by this person's behaviour I didn't think quickly enough.

"At the time of the incident there were three lorries parked up by the side of the road and they had all been there overnight and had their front window blinds up.

"Not only do these lorries cause a traffic hazard to residents trying to get into the estate, being parked all the way along this road day and night, they also create a large amount of rubbish beside the roadside by their discarded food waste and packaging.

"Surely the council should not be allowing them to regularly use this area as a day and overnight truck stop and toilet!

"I am seriously concerned about where have I moved to?"

James Bailey, Assistant Director for Highways and the Built County at Staffordshire County Council, said: "Our highways teams are aware of the issues and are working with developers to see what can be done. "We are also encouraging local businesses to provide better parking and rest facilities for their delivery drivers.

"In the meantime, residents should report any anti-social behaviour and litter concerns to the police and Tamworth Borough Council."

Adrian Evans, Managing Director at Barratt Homes West Midlands, said: "It has been brought to our attention that factory workers are using Ventura Park Road to park their vehicles overnight which is causing some inconvenience for the local community.

"We have not given permission for this and have notified Tamworth Borough Council about the issue who are looking to solve this as a matter of urgency."








# **DEPARTMENT FOR TRANSPORT**

## DfT Circular 02/2013 Department for Transport Great Minster House, 33 Horseferry Road, London SW1P 4DR

10 September 2013

# THE STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT

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# INTRODUCTION

- 1. The Highways Agency is an executive agency of the Department for Transport and is responsible for operating, maintaining and improving the strategic road network in England on behalf of the Secretary of State for Transport, guided by its core principles of 'safe roads, reliable journeys, informed travellers'.
- 2. The Highways Agency undertakes this role in the context of wider Government policies and objectives. Operating an effective and efficient strategic road network makes a significant contribution to the delivery of sustainable economic growth, helping to create the conditions that support the realisation of the aspirations of businesses and communities, and is a key deliverable for the Highways Agency in meeting its remit of delivery partner to national economic growth.
- 3. This document sets out the way in which the Highways Agency will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the strategic road network. It replaces the policy set out in Department for Transport (DfT) Circular 02/2007 Planning and the Strategic Road Network and DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on Motorways and All-purpose Trunk Roads in England. Annex A provides additional policy specific to certain types of development, whilst Annex B sets out the requirements for roadside facilities that are eligible for permanent signing from the strategic road network.
- 4. This policy should be read by local authorities, developers, enterprise partnerships, community groups and others involved in any development proposal which may result in any traffic or other impact on the strategic road network. It should be read in conjunction with the Highways Agency's planning protocol documents<sup>1</sup> which provide advice on working with the Highways Agency, within the parameters of national policy and this policy, to progress their planning proposals in an effective and positive manner.
- 5. The provisions set out in this document may be updated when appropriate to do so and readers are encouraged to check that they have the latest and true version by reference to the published version on the Department for Transport website.<sup>2</sup> Further, from time to time the Highways Agency will issue advice that seeks to address matters arising from the planning process that have the potential to impact on the strategic road network but which may require some particular consideration. Developers are encouraged to check the Highways Agency website or to contact the Highways Agency for further advice.<sup>3</sup>
- 6. This Circular is applicable to the whole strategic road network in England, including those roads managed by the Design, Build, Finance and Operate (DBFO) Companies.

<sup>3</sup> <u>www.highways.gov.uk;</u> Highways Agency Information Line (HAIL) <u>ha\_info@highways.gsi.gov.uk</u>, 0300 123 5000; <u>planningqueries@highways.gsi.gov.uk</u>; <u>roadside\_facilities@highways.gsi.gov.uk</u>

<sup>&</sup>lt;sup>1</sup> http://www.highways.gov.uk/publications/planning-protocols-for-planning-and-development/

<sup>&</sup>lt;sup>2</sup> https://www.gov.uk/government/organisations/department-for-transport

# POLICY AIMS AND APPLICATION

# The strategic road network and economic growth

- 7. As operator, the Highways Agency supports the economy through the provision of a safe and reliable strategic road network, which allows for the efficient movement of people and goods. Such a network can play a key part in enabling and sustaining economic prosperity and productivity, while also helping support environmental and social aims by contributing to wider sustainability objectives and improved accessibility to key economic and social services.
- 8. A well-functioning strategic road network enables growth by providing for safe and reliable journeys. This can help reduce business costs by providing certainty, improving access to markets, enabling competition, improving labour mobility, enabling economies of scale, and helping attract inward investment.
- 9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 10. However, even where proposals would not result in capacity issues, the Highways Agency's prime consideration will be the continued safe operation of its network.
- 11. Local authorities and developers will be required to ensure that their proposals comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit<sup>4</sup> procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges<sup>5</sup> sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform.

<sup>&</sup>lt;sup>4</sup> Non-motorised user audit will consider the needs of pedestrians, cyclists and horse riders, and should give particular consideration to the needs of disabled people.

<sup>&</sup>lt;sup>5</sup> http://www.dft.gov.uk/ha/standards/

# PLAN MAKING

# Interaction with the strategic road network

- 12. The preparation and delivery of Local Plans<sup>6</sup> provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.
- 13. To make most efficient use of the limited available capacity on the strategic road network, and because additional physical capacity is difficult, costly and takes time to provide, the Highways Agency will engage in the Local Plan process to reduce the potential for creating congestion on the strategic road network.

# Location of development

- 14. In framing its contribution to the development of Local Plans, the Highways Agency's aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network.
- 15. In order to develop a robust transport evidence base, the Agency will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. Such assessments should be carried out in line with current Department for Transport guidance or on a basis otherwise agreed with the Highways Agency.

# Promoting sustainable transport solutions through Local Plans

- 16. Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.
- 17. The Highways Agency will work with local authorities and developers to identify opportunities to introduce travel plan and demand management measures through the Local Plan. These will be based on existing and proposed patterns of development in a manner that will support sustainable transport choice and retain capacity within the transport network so as to provide for further development in future Plan periods.

<sup>&</sup>lt;sup>6</sup> Each Planning Authority is required to produce a Local Plan in accordance with the provisions of the Town & Country Planning Act 1990 (as amended) taking account of the guidance set out in the National Planning Policy Framework.

# **Capacity enhancement**

- 18. Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.
- 19. Where a potential capacity need is identified, this will be considered and weighed alongside environmental and deliverability considerations. Additional capacity may be considered in the context of the Highways Agency's forward programme of works, balancing the needs of motorists and other road users with wider impact on the environment and the local/regional community.

# **Development Orders and Neighbourhood Planning**

20. The Highways Agency will seek to engage with Local Enterprise Partnerships, communities and neighbourhoods in the development of their proposals, applying the principles outlined above.

# **DEVELOPMENT MANAGEMENT**

# **General principles**

- 21. Where development proposals are consistent with an adopted Local Plan, the Highways Agency does not anticipate the need for engagement in a full assessment process at the planning application stage. In such circumstances, considerations will normally be limited to the agreement of the details of the transport solution, including any necessary mitigation measures, and to ensuring that the transport impacts are included in the overall environmental assessment provided to the local planning authority, rather than the principle of the development itself.
- 22. However, where proposals are not consistent with the adopted Local Plan then a full assessment of their impact will be necessary, which will be based on the performance and character of the strategic road network as determined by the presumption that the Plan proposals will be fully implemented.
- 23. The Highways Agency will provide the local planning authority or other relevant consenting body with its assessment of the transport impact, as generally derived from a Transport Assessment or Transport Statement incorporating a Travel Plan as required in the National Planning Policy Framework, produced by the promoter of the development concerned in line with current Department for Transport guidance or on a basis otherwise agreed with the Highways Agency.
- 24. Where appropriate, conditions may be agreed to offset any unacceptable impacts that may be identified through the assessment process.

# Assessment of development impact

- 25. The overall forecast demand<sup>7</sup> should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater. This is known as the review period.<sup>8</sup>
- 26. The Highways Agency expects the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites. This is particularly necessary where the potential impact is on sections of the strategic road network that could experience capacity problems in the short or medium term.
- 27. Where the overall forecast demand at the time of opening of the development<sup>9</sup> can be accommodated by the existing infrastructure, further capacity mitigation will not be sought.

# **Travel Plans**

- 28. The preparation and implementation of a robust travel plan that promotes use of sustainable transport modes such as walking, cycling and public transport is an effective means of managing the impact of development on the road network, and reducing the need for major transport infrastructure.
- 29. The Highways Agency will work with local authorities and developers to identify opportunities to introduce travel plan measures for individual developments and groups of development that will support sustainable transport choice. Such measures contribute to the ongoing effectiveness of the strategic road network in ensuring efficient national and regional connectivity, whilst retaining capacity within the strategic road network so facilitating provision for further development in future Plan periods.
- 30. By the inclusion of existing development within the provisions of a travel plan associated with new development, it may be possible to free up additional capacity within the road network so that the demand generated by a proposed new development, which would otherwise be unacceptable, can be accommodated.

<sup>&</sup>lt;sup>7</sup> The overall forecast demand will be the existing flow plus traffic likely to be generated by development already committed, plus traffic likely to be generated by the development under consideration, less any reduction arising from any travel plan or demand management measures that are being proposed.

<sup>&</sup>lt;sup>8</sup> The length of the review period, at the discretion of the Secretary of State for Transport, can be amended for individual cases, where there is a wider political and economic imperative or, for example, where proposals will take a long time to develop fully. This would only be in exceptional circumstance.

<sup>&</sup>lt;sup>9</sup>The opening of the development shall be taken to be the date at which the development first becomes available for occupation, unless agreed otherwise.

# **Demand management**

- 31. Demand management involves a range of techniques that can be implemented to minimise traffic generation. There may be circumstances where the implementation of travel plan measures alone would not be sufficient to reduce the traffic demand of an individual development or group of developments to acceptable levels.
- 32. In such instances the Highways Agency will work with local planning authorities and local highway authorities to determine whether the implementation of traffic management measures could effectively regulate and manage traffic flows so as to make the most effective use of the available capacity on the strategic road network.

# **Capacity enhancement**

- 33. Only after travel plan and demand management measures have been fully explored and applied will capacity enhancement measures be considered. While capacity enhancements should normally be addressed at the planmaking stage, such measures may be considered at the time when individual planning applications are submitted, subject to the over-riding principle that delivery of the adopted Local Plan proposals should not be compromised.
- 34. Where insufficient capacity exists to provide for overall forecast demand at the time of opening, the impact of the development will be mitigated to ensure that at that time, the strategic road network is able to accommodate existing and development generated traffic. Any associated mitigation works should be appropriate to the overall connectivity and capacity of any affected part of the strategic road network.
- 35. These improvements will normally be delivered by means of a funding agreement with the Secretary of State for Transport.
- 36. Where a development will be brought forward in phases, any mitigation needs will be assessed based on the opening of the final phase. However it may be necessary to implement some mitigation measures in line with the opening of certain phases of development according to the impacts that they generate.

# ACCESS TO THE STRATEGIC ROAD NETWORK

- 37. The creation of new accesses to the strategic road network can impact on its ability to fulfil the function of facilitating the safe and effective movement of goods and people in support of economic growth by compromising traffic movement and flow.
- 38. In delivering economic growth at local level, it is essential that the wider economic needs of the country are not compromised. New accesses to busy high speed strategic roads lead to more weaving and turning manoeuvres, which in turn create additional risk to safety and reduce the reliability of journeys, resulting in a negative impact on overall national economic activity and performance.

- 39. Where appropriate, proposals for the creation of new junctions or direct means of access may be identified and developed at the Plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth.
- 40. Where the strategic growth test cannot be met there will be no additional junctions with, or direct means of access to, motorways and other routes of near motorway standard<sup>10</sup> other than for the provision of signed roadside facilities for road users (see Annex B), maintenance compounds and, exceptionally, major transport interchanges.
- 41. Where access is agreed for such development, the Highways Agency will be unable to support any subsequent change in permitted land use that retained the agreed access. Further through access to other developments will not be permitted.
- 42. Access to motorways and routes of near motorway standard for other types of development will be limited to the use of existing junctions with all-purpose roads. Modifications to existing junctions will be agreed where these do not have an adverse impact on traffic flows and safety. In line with the standards contained in the Design Manual for Roads and Bridges, for safety and operational reasons, direct connections to slip roads and/or connector roads will not be permitted.
- 43. The Highways Agency will adopt a graduated and less restrictive approach to the formation or intensification of use of access to the remainder of the strategic road network. However, the preference will always be that new development should make use of existing junctions. Where a new junction or direct means of access is agreed, the promoter will be expected to secure all necessary consents, and to fund all related design and construction works.
- 44. On a trunk road that is not a motorway or a route of near motorway standard, any proposal to change the use of an existing roadside facility for road users will be considered against local conditions and the merits of the individual case.

# **ENVIRONMENTAL IMPACT**

45. In consultation with relevant infrastructure providers, statutory environmental advisors and consenting authorities, developers must ensure all environmental implications associated with their proposals, are adequately assessed and reported so as to ensure that the mitigation of any impact is compliant with prevailing policies and standards. This requirement applies in respect of the environmental impacts arising from the temporary construction works and the permanent transport solution associated with the development, as well as the environmental impact of the existing trunk road upon the development itself.

<sup>&</sup>lt;sup>10</sup> Routes of near motorway standard will normally be grade-separated dual carriageway routes benefitting from restricted direct access.

- 46. Where a likely negative impact on the environment resulting from the proposals occurs outside of a highway boundary as a result of the proposals (for example air quality, visual impacts, artificial light or noise impacts at new housing affected by a road), any required mitigation measures must be located outside of the strategic road network's highway boundary.
- 47. Developers must ensure adequate environmental information is provided at all stages of the planning process to satisfy the local planning authority and any other consenting authorities that the environmental impacts have been appropriately considered, that measures have been included within the proposals as required by relevant policies or otherwise, as fully as is reasonably possible, and to enable all residual impacts to be taken into account by the local planning authority in the development consent process.
- 48. Transport assessment undertaken by the promoter of the development should be comprehensive enough to establish the likely environmental impacts, including air quality, light pollution and noise, and to identify the measures to mitigate these impacts.<sup>11</sup> This will enable local authorities to fulfil their remit of considering appropriate environmental impact assessment of development.

# PHYSICAL IMPACT OF DEVELOPMENT ON THE STRATEGIC ROAD NETWORK

- 49. There may be development proposals that, whilst not within the statutory requirement for a local planning authority to consult the Highways Agency, have the potential for direct or indirect physical impact on the strategic road network or its amenities, or to put users of the road at risk (such as fire hazard; stability of embankments and cuttings; integrity of structures; water run-off; air quality; visibility of traffic signs; etc.). Developers and local authorities are encouraged to identify such potential risks and discuss with the Highways Agency at the earliest opportunity to avoid the possibility of delaying or putting the delivery of their proposals at risk.
- 50. In order to ensure the integrity of the highway drainage systems, no water run off that may arise due to any change of use will be accepted into the highway drainage systems, and there shall be no new connections into those systems from third party development and drainage systems. Where there is already an existing third party connection the right for connection may be allowed to continue provided that the input of the contributing catchment to the connection remains unaltered.

<sup>&</sup>lt;sup>11</sup> Advice and standards for environmental assessment of development affecting trunk roads can be found in the Design Manual for Roads and Bridges at <u>http://www.dft.gov.uk/ha/standards/dmrb/vol11/</u>

# ANNEX A: SPECIAL TYPES OF DEVELOPMENT

# NOISE FENCES, SCREEN FENCES, ETC

A1. For reasons of safety, liability and maintenance, with the sole exception of fences owned and provided by the Highways Agency at its own cost, all noise fences, screening and other structures must be erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land.

## **ADVERTISEMENTS**

A2. The Highways Agency will not object to proposals for advertising consent for displays outside of the highway boundary of the strategic road network unless it has specific reason to consider that a hazard to road safety would be a direct consequence of the development. This would include advertisements that are located where particular attention should be given to the driving task, or where they unlawfully incorporate elements of traffic sign design, such as directional arrows. Advertisements within the highway boundary are not permitted. The Highways Agency will remove any unauthorised adverts placed within the highway boundary.

# GATEWAY STRUCTURES AND PUBLIC ART

- A3. The siting of gateway structures and public art within the highway boundary of the strategic road network will not be permitted for legal, safety and operational reasons. However, the siting of such features near the strategic road network may be seen as desirable to local authorities and developers. The Highways Agency is keen to support delivery of such proposals where no additional risk to road users is presented.
- A4. Due to the wide variety of design and form that such structures may take, and therefore the scope for the potential impact on safety and operation of the strategic road network, it is not practical to address all possible considerations in this policy. The Highways Agency encourages any promoter of such a proposal that may be near to or impact on the road network to discuss design and delivery proposals at the earliest opportunity.

#### **TELECOMMUNICATIONS EQUIPMENT**

- A5. Mobile Network Operators have the right under the Telecommunications Act 1984 to install equipment within the boundary of a highway that is not a protected street (as defined by section 61 of the New Roads and Street Works Act 1991) once they have obtained planning permission where required.
- A6. Such installations must not cause a safety or environmental hazard to any road users, workers, or any third party and it must not interfere in our ability to carry out either routine or structural maintenance. Neither should any harm be caused to the long-term integrity of the highway including pavement, earthworks, structures, drainage works and ancillary equipment. Traffic signs must not be obscured. These factors should be discussed with the relevant Highways Agency's Area Manager prior to any works being undertaken.

- A7. All operations must be carried out without interference to traffic flows.
  - To these ends, the Highways Agency requires Mobile Network Operators to obtain technical approval for their installation, and provide a full road safety audit, which must consider the installation of the equipment and its maintenance as well as any static hazard presented. Full details of .the registration procedure can be found in the DMRB at <u>http://www.dft.gov.uk/ha/standards/tech\_info/</u>

# WIND TUBINES

# Location

- A8. In order to mitigate the risks to the safety of road users arising from structural or mechanical failure, the Highways Agency will seek a minimum setback from the highway boundary of height + 50 metres or height x 1.5, whichever is the lesser.<sup>12</sup>
- A9. The Highways Agency recognises that, in certain circumstances, variation to the above set-back may be considered appropriate, subject to the findings of a site-specific assessment. In particular this may apply where there is a significant difference in elevation between the highway and the proposed turbine location. The proposer would be expected to demonstrate that any relaxation on the suggested set-back distance poses no unacceptable risk. The burden of proof will lie with the proposer.

# 'Icing'

A10. Most modern wind turbines will have vibration and/or climate sensitive technology that will shut down the turbine if there is the potential for icing. Where this technology is present there should be no need to consider this issue further. Evidence of this technology on the proposed turbines should be provided.

# **Visual distraction**

- A11. Any potential for visual distraction should be minimised by the provision of a clear, continuous view of the wind turbine(s) that develops over the maximum possible length of approach carriageway.
- A12. Wind turbines should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp bends, and crossings for pedestrians, cyclists and horse riders.
- A13. The existing road accident record nearing the vicinity of the proposed wind turbine(s) should be analysed with particular attention being given to accident types. Locations with a history of rear end shunt accidents should be treated with particular caution.

<sup>&</sup>lt;sup>12</sup> Subject to over-riding provisions contained in legislation elsewhere, for example those relating to permitted development.

# Dazzle

A14. Most turbines will be constructed with materials that eliminate dazzle, and this should be easy to establish and eliminate as a concern. Evidence of this technology on the proposed turbines should be provided.

# Access

- A15. The promoter of a wind farm should prepare a report covering the construction, operation and de-commissioning stages of the development. From this, the acceptability of the proposal should be determined and any mitigating measures should be identified.
- A16. Access to the site for construction, maintenance and de-commissioning should be obtained via the local road network and, normally, there should be no direct connection to the strategic road network.
- A17. Swept path analyses should be provided by the developer for the abnormal load deliveries to the site.

# ANNEX B: ROADSIDE FACILITIES FOR ROAD USERS ON MOTORWAYS AND ALL-PURPOSE TRUNK ROADS IN ENGLAND

# INTRODUCTION

- B1. This annex sets out policy on the provision, standards and eligibility for signing of roadside facilities on the strategic road network, to enable compliance with the Traffic Signs Regulation and General Directions 2002.<sup>13</sup> It replaces Department for Transport (DfT) Circular 1/2008 Policy on Service Areas and other Roadside Facilities on Motorways and All-purpose Trunk Roads in England.
- B2. All such proposals will be considered in the context of the National Planning Policy Framework and, in particular, the statement that it includes regarding the primary function of roadside facilities being to support the safety and welfare of the road user.

# **APPLICATION OF POLICY**

B3. This policy applies to all existing signed roadside facilities, and to all proposed signed roadside facilities. It should be noted that the operation of all signed roadside facilities will be the subject of a legal agreement between the Secretary of State and the operator.

# SPACING

- B4. Motorway service areas and other roadside facilities perform an important road safety function by providing opportunities for the travelling public to stop and take a break in the course of their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours. Drivers of many commercial and public service vehicles are subject to a regime of statutory breaks and other working time restrictions and these facilities assist in compliance with such requirements.
- B5. The network of service areas on the strategic road network has been developed on the premise that opportunities to stop are provided at intervals of approximately half an hour. However the timing is not prescriptive as at peak hours, on congested parts of the network, travel between service areas may take longer.

<sup>&</sup>lt;sup>13</sup> Or any subsequent replacement. To be lawfully placed on the highway all signs (whether permanent or temporary) must either be prescribed by legislation or be specially authorised on behalf of the Secretary of State.

- B6. The Highways Agency therefore recommends that the maximum distance between motorway service areas should be no more than 28 miles. The distance between services can be shorter, but to protect the safety and operation of the network, the access/egress arrangements of facilities must comply with the requirements of the Design Manual for Roads and Bridges<sup>14</sup> including its provisions in respect of junction separation.
- B7. Speed limits on the strategic road network vary and therefore, applying the same principles, the maximum distance between signed services on trunk roads should be the equivalent of 30 minutes driving time. This distance can also be shorter, also subject to compliance with design requirements set out in the Design Manual for Roads and Bridges.
- B8. The distances set out above are considered appropriate for to all parts of the strategic road network and to be in the interests and for the benefit of all road users regardless of traffic flows or route choice. In determining applications for new or improved sites, local planning authorities should not need to consider the merits of the spacing of sites beyond conformity with the maximum and minimum spacing criteria established for safety reasons. Nor should they seek to prevent competition between operators; rather they should determine applications on their specific planning merits.

# PLANNING AND DEVELOPMENT

- B9. It is for the private sector to promote and operate service areas that meet the needs of the travelling public. New and existing roadside facilities are subject to the provisions of relevant planning legislation and regulation, which together set the framework within which local planning authorities would consider the planning proposals for such developments.
- B10. As a statutory consultee within the planning system, the Highways Agency continues to have an interest in such proposals and will provide advice to local planning authorities on matters relating to the impact that such proposed developments will have upon the safety and operation of the strategic road network. Local planning authorities and developers are encouraged to discuss with the Highways Agency at the earliest opportunity any proposals to develop new roadside facilities or to alter and/or sign existing sites. All such proposals should be referred to the Highways Agency, Planning & Economic Development, The Cube, 199, Wharfside Street, Birmingham B11RN; roadside facilities@highways.gsi.gov.uk

# TRIP GENERATION

B11. In circumstances where there is potential for these to become destinations in their own right, the Highways Agency will only support proposals for or within service areas and other roadside facilities if it can be shown that there would be no overall increase in trip mileage, and always provided that there would be no significantly adverse impact on the safety and operation of the strategic road network.

<sup>&</sup>lt;sup>14</sup> http://en.wikipedia.org/wiki/Design Manual for Roads and Bridges

# IMPACT OF ROADSIDE FACILITIES ON THE STRATEGIC ROAD NETWORK

B12. At all roadside facilities, it is particularly important to avoid adverse impacts upon the effective operation of the strategic road network, such as increasing the risk of congestion or of vehicles slowing or stopping on the main carriageway. Proposals for new roadside facilities will be subject to road safety audit procedures to be undertaken in accordance with the requirements of the Design Manual for Roads and Bridges.

## LOCATION

- B13. On-line (between junctions) service areas are considered to be more accessible to road users and as a result are more attractive and conducive to encouraging drivers to stop and take a break. They also avoid the creation of any increase in traffic demand at existing junctions.
- B14. Therefore, in circumstances where competing sites are under consideration, on the assumption that all other factors are equal, the Highways Agency has a preference for new facilities at on-line locations.
- B15. However, in circumstances where an on-line service area cannot be delivered due to planning, safety, operational or environmental constraints, a site sharing a common boundary with the highway at a junction with the strategic road network is to be preferred to the continued absence of facilities.
- B16. An exception to these general location criteria are truckstops located within 2 miles of the strategic road network that otherwise meet the minimum requirements for signing. However signing will not be agreed in circumstances where, in order to reach such a truckstop, HGVs would be required to pass through residential areas.

#### MINIMUM REQUIREMENTS FOR SIGNING

B17. The following criteria set out the minimum requirements for the various types of roadside facility that may be eligible for signing from the strategic road network. All facilities accessed from the motorway must be signed for safety reasons and as such all existing or future sites must meet the requirements for signing.

Table B1: Minimum requirements for the various types of roadside facility that may be eligible for signing from the strategic road network

Minimum requirements to be eligible for signing M= Mandatory P = Permitted	Motorway		APTR service	Truckstops	Truckstops signed	Truckstops
	Service Area	Rest Area	area *	on Motorways	from SRN #	on All- Purpose Trunk roads
Open 24 hrs a day 365 days a year	М	М	N/A	м	N/A	N/A
Open minimum 12 hours per day between 8am and 8pm every day except Christmas Day, Boxing Day and New Year's Day.	N/A	N/A	М	N/A	М	М
Free parking for up to 2 hours minimum for all vehicles permitted to use the road served by the facility.(see schedule 1)	М	М	М	М	М	М
Free toilets/hand washing facilities with no need to make a purchase.	М	М	М	М	М	М
Shower and washing facilities for HGV drivers, including secure lockers in the shower/washing area.	М	Ρ	Ρ	М	М	М
Fuel	М	Р	М	М	Р	Р
Hot drinks and hot food available at all opening hours for consumption on the premises.	М	Ρ	Ρ	М	Ρ	Ρ
Hot drinks and hot food available 8am to 8pm for consumption on the premises.	N/A	Ρ	М	N/A	М	М
Access to a cash operated telephone.	М	М	М	м	м	М
Use as an operating centre for the purposes of the Goods Vehicles (Licensing of Operators) Act 1995 or the Public Passenger Vehicles Act 1981.	Prohibited	Prohibited	Prohibited	Prohibited	Ρ	Ρ

\* Limited to a single or exceptionally 2 adjoining interconnected premises, accessed directly from the trunk road or directly from a junction on the trunk road.

# See note B16 Location

B18. Further guidance on the design, authorisation, funding, installation and maintenance of signs is available from the Highways Agency.<sup>15</sup>

# **PARKING CHARGES**

B19. At all types of site, where a charge is to be levied for parking beyond the mandatory two free hours, the charging regime must be clearly displayed within both the parking areas and the amenity building. Drivers must at all times be afforded the opportunity to pay the charge on the site, before leaving and without the necessity to use a mobile phone. Cash payments must be accepted.

# **PICNIC AREAS**

- B20. Picnic areas will be permitted at all of the above types of facility.
- B21. The provision of a minimum of ten tables, each with seating for six, will allow the inclusion of a 'picnic area' symbol as one of the generic symbols/logos shown on the advanced direction sign to that site.

# ACCESS TO THE STRATEGIC ROAD NETWORK

- B22. The availability of other connecting access routes at new sites will be considered on a site by site basis by the relevant local planning authority as part of the planning process. The Highways Agency will provide input as a statutory consultee to the planning process.
- B23. In order to avoid the creation of unofficial road junctions there must be no through connection to the associated motorway or all-purpose trunk road. Where subsidiary accesses may be approved their will be restricted to staff, deliveries, parties carrying out duties for and on behalf of the Secretary of State for Transport, the emergency services, and breakdown recovery and assistance.
- B24. Access to other developments through a roadside facility is not permitted.

# SIGNING

B25. All signing of roadside facilities and signing arrangements within sites must comply with the current Traffic Signs Regulations and General Directions and any other guidance as may be issued from time to time by the Department for Transport or the Highways Agency. Approval must be sought from the Highways Agency's signs specialist for the use of all non prescribed signs. Advice and working drawings may be obtained from <u>traffic.signs@dft.gsi.gov</u>

# MANDATORY PARKING PROVISION

B26. Where a site is subject to a pre-existing sealed agreement which specifies the levels of parking provision, this shall continue to apply until such time as the scale and/or scope of on-site activities is extended.

<sup>&</sup>lt;sup>15</sup> This will be provided as a guidance note alongside the published circular.

- B27. Where the scale and/or scope of on-site activities is extended, the methodology set out in Schedule 1 shall be used for calculating the numbers of parking spaces by vehicle type that should be provided for the various types of roadside facility. The methodology set out in Schedule 1 will also be used for calculating the levels of parking provision for all new sites promoted after the publication of this policy.
- B28. However, notwithstanding the provisions of the previous two paragraphs, levels of provision may be adjusted to reflect local conditions through a process of site specific negotiation. It will be the responsibility of the site operator to demonstrate that any departure from the requirements of Schedule 1 is appropriate.

# **RETAIL ACTIVITIES**

B29. The scope and scale of retail activities at roadside facilities is a matter for consideration by the relevant local planning authority in line with the National Planning Policy Framework and local planning policies. However, local planning authorities should have regard to the primary function of roadside facilities which is to support the safety and welfare of the road user.

## HOTELS, CONFERENCE CENTRES AND BUSINESS CENTRES

- B30. Such development will be a matter for consideration by the relevant local planning authority in line with the National Planning Policy Framework and local planning policies.
- B31. As a statutory consultee to such proposals, the Highways Agency will not object to the provision of hotels; conference centres; and business centres at the sites of roadside facilities for motorists unless there would be demonstrable adverse impact on the safety and/or operation of the strategic road network such as a net increase in travel.
- B32. Separate parking must be provided to service such developments so as to avoid any reduction in the general parking provision available to other road users.

# COACH INTERCHANGES, PARK & RIDE, AND PARK & SHARE

- B33. Such development will be a matter for consideration by the relevant local planning authority in line with the National Planning Policy Framework and local planning policies.
- B34. As a statutory consultee to such proposals, the Highways Agency will take account of the local transport benefits in its response to proposals for coach interchanges; park & rides; and park and share facilities for motorists, and will not object unless there would be demonstrable adverse impact on the safety and/or operation of the strategic road network or the roadside facility in question.. The Highways Agency particularly welcomes proposals that will produce a net reduction of trip mileage.
- B35. Separate parking must be provided to service such activities so as to avoid any reduction in the general parking provision available to other road users.

# FACILITIES FOR LOW EMISSION VEHICLES

B36. Operators of roadside facilities are encouraged to provide refuelling facilities for low emission vehicles, including recharging facilities for plug-in vehicles and other arrangements that meet the needs of emergent low carbon and alternative fuel technologies as appropriate, such as gas refuelling stations. More information can be found at www.gov.uk/government/organisations/department-for-transport.

# DRIVER AND TOURIST INFORMATION

B37. Operators of roadside facilities are encouraged to provide live traffic information services and to make available local, regional and national tourist information.

# ON-SITE POWER GENERATION AND OTHER SUSTAINABILITY MEASURES

B38. Operators are encouraged to introduce measures that reduce the carbon footprint of their sites. However, such measures as may be provided should be compliant with relevant guidance as may be issued from time to time by the Highway's Agency. In this context, operators' attention is drawn to the provisions set out in Annex A regarding wind turbine development.

# **SCHEDULE 1**

Parking requirements for different types of vehicle should be calculated on the basis of the table below, using the most recent complete year data to identify the peak monthly flow, averaging that to find the daily flow and then applying the appropriate formulae:

A = number of cars and light goods vehicles; and

B = number of HGVs and coaches

Advice on obtaining and interpreting traffic flows should be obtained from the Highways Agency

Parking requirements at motorway service areas						
	Calculation <sup>16</sup>	Variable	Notes			
Traffic flow (Vehicles per day) <sup>17</sup>						
Light vehicle		А	Advice on traffic			
HGV and coach		В	from the Highways Agency			
No. of parking spaces required <sup>18</sup>						
Cars	0.5 % of A	С				
HGV	0.5 % of B	D				
Abnormal load	Minimum of 1					
Coach	0.1 % of B	Е				
Coach interchange <sup>19</sup>	No. of bays provided	E1				
Caravan/motorhome/vehicle and trailer	0.015 % of A	F				
Motorcycle	0.015% of A (where the percentage falls below 10 a minimum of 10 should be provided)	G	Dedicated motorcycle bays for securing bikes			
Additional spaces for lodges	One space per 2 bedrooms					
Spaces for disabled users	5% of C (where the percentage falls below 5 a min. 5 should be provided)					
Spaces for disabled users caravan/motorhome/ vehicle and trailer	5% of F (where the percentage falls below 2 a min.2 should be provided)		Located adjacent to the front entrance			
Spaces for disabled lodge users	min. of 2					

# Parking requirements at motorway rest areas

The parking requirements for a motorway rest area are half those required for a motorway service area, rounded up to the higher whole number as necessary.

<sup>&</sup>lt;sup>16</sup> The Highways Agency's Planning and Economic Development Team can assist with these calculations. <sup>17</sup> Where the necessary supporting information is available operators may wish to increase the

number of parking spaces for particular types of vehicle in recognition of the particular make up of the road users served by the facility.

 <sup>&</sup>lt;sup>18</sup> Parking for disabled travellers should be clearly signed at the entrance to the MSA.
<sup>19</sup> Where such a facility has been permitted.

# Parking requirements at motorway truckstops

The parking requirements for a motorway truckstop are the same as the HGV requirement for a motorway service area. For safety reasons a minimum of 10 parking spaces for cars; 1 space for a car with caravan; and 1 space for a coach should be provided. A minimum of 1 abnormal load space should also be provided.

Parking requirements at trunk road service areas				
	Calculation <sup>20</sup>	Notes		
No. of parking spaces required	1 <sup>21</sup>			
Cars	0.1 % of A	Minimum of 10		
HGV	Minimum of 2			
Abnormal load	Minimum of 1			
Coach	Minimum of 1			
Coach interchange <sup>22</sup>	No. of bays provided			
Caravan/motorhome/ vehicle and trailer	Minimum of 2			
Motorcycle	0.015% of A (where the percentage falls below 10 a minimum of 10 should be provided)	Dedicated motorcycle bays for securing bikes		
Additional spaces for lodges	One space per 2 bedrooms			
Spaces for disabled users	Minimum of 3			
Spaces for disabled users caravan/motorhome/vehicle and trailer	Minimum of 1	Located adjacent to the front entrance		
Spaces for disabled lodge users				

<sup>&</sup>lt;sup>20</sup> The Highways Agency's Planning and Economic Development Team can assist with these calculations. <sup>21</sup> Parking for disabled travellers should be clearly signed at the entrance to the services. <sup>22</sup> Where such a facility has been permitted.

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# **HGV Parking Beat Survey**

This short Technical Note sets out a methodology for undertaking a 'parking beat' survey of HGV parking in the local area surrounding Hodgetts Estates' M42 Jct 10 site. While the survey has been commissioned by and conducted on behalf of *Hodgetts Estates* in relation to their plans for a lorry parking facility adjacent to M42 Jct 10, it has been designed and conducted independently by *MDS Transmodal* and *WSP* respectively.

#### Purpose of the Survey

To identify excess HGV parking demand through quantifying the number of HGVs that are parking on a typical weekday evening/night at known and potential inappropriate non truck-stop locations in the local area surrounding Hodgetts Estates' M42 Jct 10 site.

#### Definition

In this case, "inappropriate non truck-stop locations" are defined as locations which have not been purposely designed to accommodate overnight HGV parking. They are locations which lack dedicated purpose built toilet amenities and permanent food/snack/hot drink outlets and include, amongst other types of sites, waste/derelict land, lay-bys, roads within industrial estates and retail outlet parks. Sites that are within walking distance of a drive-through fast food outlet and toilets primarily designed to serve other land-use functions, such as a supermarket, are classed as "inappropriate non truck-stop locations". Locations under this definition will therefore include places where traffic flow is not being impeded and other impacts are marginal, albeit they lack suitable amenities which are required to support overnight parking.

#### Timings

Conforming to the survey methodology adopted by the National Survey of Lorry Parking, the parking beat survey is to be conducted on Tuesday, Wednesday and Thursday evenings during one week in late September 2021, between the hours of 21:00 and 02:00 (the National Survey of Lorry Parking adopted 18:00 to 02:00, albeit the surveyors had a much larger area to cover).

#### **Counting Process**

For both personal and driving safety reasons, the survey is to be conducted in a car by a two-person team comprising of a driver and an enumerator, remaining in the vehicle at all times during the data collection process. The team will follow a set route to each of the identified known and potential inappropriate non truck-stop locations (see below), and at each location the number of HGVs parked will be physically counted and noted on paper recording sheets (a pro-forma recording sheet is attached to the end of this note). Pictures (where possible registration plates to be avoided) will also be taken to validate the number of HGVs recorded, using a smart-phone or digital camera that can



record the date and time of the picture. The team will undertake two laps of the set route each night, recording and photographing HGVs on each lap as described. This will also provide an opportunity to take a food/drink and comfort break between laps.

#### Locations and Route

Conforming to the survey methodology adopted by the National Survey of Lorry Parking (which assessed parking at sites within 5km of the strategic road network), the parking beat survey is to quantify parking at known and potential inappropriate non truck-stop locations within a 5km radius of the M42 Jct 10. The known and potential inappropriate non truck-stop locations were identified by means of a desk-top mapping exercise, supplemented by local knowledge of Hodgett Estates' management. Where locations are beyond the 5km radius but the access road from the strategic road network is within the distance, these locations have also been included in the survey. Having identified the known and potential inappropriate non truck-stop locations, a set route was then devised in order to visit each location in the most efficient manner.

As a further measure, Tamworth MSA will also be visited on the set route, with any <u>excess parking</u> also recorded. This is defined as the number of HGVs parking away from the designated HGV parking bays, such as on the side of entry/exit slip roads, grass verges and in parking areas reserved for other uses (e.g. coaches, caravans etc..). The locations and the set route are as follows. They are illustrated on the maps following.

- 1. Carylon Road Industrial Estate, Atherstone;
- 2. Holly Land Industrial Estate and Aldi UK HQ, Atherstone;
- 3. A5 Corridor Atherstone to Junction 10;
- 4. Core 42 Business Park, Dordon;
- 5. Birch Coppice Business Park, Dordon;
- 6. St Modwens Park Tamworth, Jct 10 M42;
- 7. Kingsbury Link Business Park and Oil Terminals (BP and Valero Energy), Kingsbury;
- 8. Centurion Park, Jct 10 M42;
- 9. Relay Park, Jct 10 M42;
- 10. Tamworth MSA
- 11. Old Watling Street corridor Jct 10 to Sutton Road though Wilnecote and Fazeley
- 12. Tame Valley Industrial Estate, Tamworth;
- 13. Riverside Industrial Estate, Fazeley, Tamworth;
- 14. Drayton Manor Business Park, Fazeley, Tamworth;
- 15. Ventura Park, Tamworth;
- 16. Lichfield Road Industrial Estate, Tamworth;
- 17. Kettlebrook Road Industrial Area, Tamworth;
- 18. Amington Industrial Estate, Tamworth

In addition, HGVs parking at any other locations not covered by the above list will also be recorded/photographed as described (using a separate pro-forma for each location).



#### Carylon Road, Atherstone



#### Holly Lane, Atherstone





#### A5 Corridor – Jct 10 to Atherstone



Core 42





# Birch Coppice



#### St Modwen Park







## Kingsbury Link and Oil Terminals (both BP and Valero Energy oil terminals)

**Centurion Park** 





# Relay Park



Tamworth MSA







#### Old Watling Street corridor – Jct 10 to Sutton Road though Wilnecote and Fazeley

#### Tame Valley Industrial Estate





Riverside Industrial Estate, Fazeley, Tamworth



Drayton Manor Business Park, Fazeley, Tamworth





#### Ventura Park



## Lichfield Road Industrial Area





#### Kettlebrook Road Industrial Area



# Ammington Industrial Estate





#### Route



Start/Finish each lap at Carylon Road, Atherstone


## **Record Sheet**

Location:	
First Lap: Number of HGVs	Date:
	Time:
Second Lap: Number of HGVs	Date:
	Time:

