

# **Consultation on Policy for Service Areas and Other Roadside Facilities**

On Motorways and All-Purpose Trunk Roads in England

## ***A Summary of Responses***

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# 1 Introduction

- 1.1 This report provides a summary of the responses received by the Highways Agency to its consultation document on Policy for Service Areas and Other Roadside Facilities on Motorways and All-Purpose Trunk Roads in England.
- 1.2 The Government wishes to see the provision of roadside facilities maintained and the purpose of the consultation was to seek ways to enhance this provision, so as to improve services for motorists and lorry drivers, but not so as service areas become destinations in their own right.
- 1.3 The consultation was a call for evidence seeking a wide range of views from industry, interested organisations and the public, to inform the development of consolidated and up-dated guidance on the provision of roadside facilities. The responses will be considered alongside other evidence in determining the content of the revised guidance.
- 1.4 The call for evidence ran for 12 weeks, beginning on 16 November 2006 and concluding on 8 February 2007.
- 1.5 In all, 153 responses were received. We also received some other related correspondence and press coverage. A Stakeholder Event attended by a number of consultees was held in Birmingham on 8 January 2007, at which a number of points were raised and discussed. These are also summarised in this report.
- 1.6 The breakdown of the responses is as follows:

By type of respondent	Number of consultees invited	Number of consultees responding	Additional responses received	Total
Members of the public	-	-	96	96
Devolved/Regional/Local Government Bodies	5	2	13	15
Trades Union and Professional Associations	10	0	3	3
Non-Governmental Organisations	5	3	5	8
Roadside Facility Operators	9	4	0	4
Trade Associations	4	4	0	4
Road Users' Bodies	11	7	2	9
Other Private Sector	5	1	4	5
Other Public Sector	-	-	3	3
Other	10	4	2	6
<b>TOTAL</b>	<b>59</b>	<b>25</b>	<b>128</b>	<b>153</b>

- 1.6 Because of the nature of the questions, detailed responses were received and a descriptive summary of these has been provided to capture a flavour of the range of views.
- 1.7 The summary follows in sequence the issues raised in the consultation document, with the key questions repeated for ease of reference. Given that only a minority of respondents answered each individual question, the summary will treat each issue in the round.
- 1.8 No respondents made any stipulation as to confidentiality. Individual respondents are occasionally referred to in this summary and, in places, direct quotes are included. We wish to reassure those whose arguments may not be specifically referred to that every response has been fully considered. In taking forward the policy review, we will continue to take account of the responses themselves and will not rely on this summary alone, which cannot capture fully every point raised.
- 1.9 The views represented are those of consultees, not those of the Highways Agency or the Department for Transport (unless clearly indicated); and nothing in this summary should be taken to imply that decisions have been taken on any aspect of the policy review.
- 1.10 As stated in the Call for Evidence, information provided in any response, including personal information may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000, the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).
- 1.11 Also in accordance with the Freedom of Information Act 2000 if you wish to see a particular response in part or in full, this can be made available. Any request will be assessed against the requirements of the Act. To obtain the extract or response you require please email [roadsidefacilitiesreview@highways.gsi.gov.uk](mailto:roadsidefacilitiesreview@highways.gsi.gov.uk) or contact

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- 1.12 The Highways Agency is grateful to all those who gave the time and effort to contribute. A list of responding individuals and organisations can be found in the Appendix (see page 34).

## 2 Detailed Summary of Responses

### 2.1 Issue 1 – Determining Need

#### Questions asked:

*Should the Highways Agency be given a role in providing advice on the need for MSAs?*

*Would this be likely to improve the availability of service areas for motorway users?*

*Are there other changes that would be likely to improve the provision of facilities for motorway users?*

*Do you have evidence to support your views?*

- 2.1.1 Respondents were overwhelmingly in favour of the Highways Agency being given a greater role in providing advice on the need for MSAs. Many felt that the Highways Agency was the body best placed to ensure that MSAs are provided where a safety need has been identified, and to guarantee a consistent approach across the motorway network. It was argued (by an organisation advocating social enterprise) that *'the Highways Agency is the most independent/neutral body who can determine provision on the basis of customer need. This contrasts with the private sector providers of MSAs who want to see the siting of MSAs where profit can be maximised at the expense of other considerations and planning authorities who are influenced by the opinions of local voters'* (Co-operative Futures).
- 2.1.2 Although there were no arguments made against the Highways Agency adopting such a role, there were some important qualifications. It was stressed that Local Planning Authorities (LPAs) should retain their role as *'providers of important commentary and advice on the impact of such developments on the locality'* (Gloucestershire County Council). However, there was recognition that a national, strategic view must be taken, since *'real need is unlikely to be identified from local sources'* (Durham County Council). At the Stakeholder event, it was suggested that there should be a clearer Government steer for Local Authorities, with improved planning policy guidance and input regarding the need for MSAs into the Regional Spatial Strategy (RSS) and Local Development Framework (LDF) from the centre.
- 2.1.3 It was suggested that an assessment of need should take account of different market sectors (for example, business travellers, lorry drivers and tourists), who all require different kinds of services (Visit Britain). There was a request that different user groups be adequately consulted in order to determine need (The Caravan Club).

- 2.1.4 The MSA operators support any moves to simplify and speed up the planning system, but argue against the provision of more service areas, instead preferring an expansion of existing sites: *'We maintain the belief that maximising the use of existing sites is the most sustainable, realistic and practical way of meeting the forecast growth in traffic volumes'* (MSA Operators Committee). This will require investment: one operator stated that they are willing to invest in *'improving capacity and the customer experience'*, but *'can only afford to continue this investment if it continues to earn a reasonable return'* (Welcome Break).

## 2.2 Issue 2 – Spacing of Motorway Service Areas

### **Questions asked**

*Would revising the spacing criteria to take account of traffic flows and/or travel time ensure a better distribution of service areas?*

*Are there other ways in which the location of MSAs should be determined?*

*Do you see a greater need to increase capacity and improve facilities at existing MSAs or a need for more MSAs? If so, is this for particular types of vehicle or for all vehicles?*

*Subject to appropriate legislation, should rest areas, providing a limited range of facilities, be developed between MSAs?*

*Should there be a preference for on-line sites rather than junction locations?*

*Do you have evidence to support your views?*

### ***Spacing criteria***

- 2.2.1 Many respondents were in favour of changing spacing criteria to take account of travel time rather than distance. Of these, most felt that thirty minutes driving time would be a reasonable spacing. However, it was noted that such criteria would have to take account of congestion, a highly variable parameter according to time of day and season.
- 2.2.2 The MSA operators expressed interest in the proposal to change from distance to travel time-based criteria, but argued that *'such a policy change would only work if local planning authorities were persuaded to allow more development in the first place'* (MSA Operators Committee).

### ***Increased frequency versus expansion of existing sites***

- 2.2.3 Respondents were divided fairly equally between those who saw a need for more service areas and those who believed that capacity should be increased at existing sites. Support for more MSAs came from some road users' groups, including the RAC Foundation for Motoring, the Disabled Persons Transport Advisory Committee, Mobilise Organisation (representing disabled drivers) and the Professional Drivers Association. The Royal Society for the Prevention of Accidents (RoSPA) were also in favour. The issue of 'sleep-related accidents' was raised by several respondents in support of increasing the frequency of service areas.
- 2.2.4 A substantial number of respondents, including the MSA operators, were against any increase in the number of service areas. It was pointed out that,

*'compared to other EU countries the UK has amongst the highest MSA coverage per motorway kilometre'* (MSA Operators Committee). However, there were many comments from members of the public expressing concern at the lack of service areas on certain sections of the network (the M25 was the road most often mentioned). It was pointed out that in an RAC Foundation survey in 2004, 64% of respondents wished to see more rest and service areas on motorways (Disabled Persons Transport Advisory Committee).

- 2.2.5 At the Stakeholder event, it was argued that the establishment of new facilities was being prevented by the high capital cost, perhaps as a result of the minimum criteria for facilities.

### **Rest areas**

- 2.2.6 There were a large number of responses, particularly from the public, in favour of roadside rest areas. Experiences in France and other European countries were often mentioned. Advice from The Office of Fair Trading (OFT) was that although such rest areas are unlikely to be full substitutes for using MSAs, they would provide some competitive pressure on the operators of MSA services. This was acknowledged by the operators: *'Whilst we support all efforts to reduce driver fatigue we are clearly concerned that the provision of additional unmanned rest areas with no provision for 24 hour coverage will create a competitor which will undermine MSA operators who currently provide a range of free 24 hour services'* (RoadChef Ltd). The question of financial viability was raised by a number of consultees. Other respondents had concerns over safety, security and congestion. These will be summarised under 'Issue 7 – Motorway Picnic Areas' (page 20).

### **On-line and junction sites**

- 2.2.7 Most respondents who addressed the issue were in favour of a policy preference for on-line MSAs, although it was recognised that junction locations may be the only option in certain circumstances. Road safety was the principal argument made in favour of on-line sites: *'they are safer and more convenient for drivers entering and leaving them'* (RoSPA). Where service areas are located some distance from the motorway, they *'do not encourage drivers en-route to other destinations to take a break when confronted with considerable traffic leaving the motorway'* (Association of Industrial Road Safety Officers).
- 2.2.8 It was also suggested that junction sites are at risk of becoming 'destinations in their own right'. However, it was stated that service areas located at junctions have a less deleterious environmental impact: *'MSAs at existing junctions are far better for the environment than stand alone sites within the countryside, which do not permit changes of route direction'* (Public respondent).



## 2.3 Issue 3 – Signing of Motorway Service Areas and HGV Parking

### **Questions asked:**

*Should sub-operator brand logos be displayed on new, separate, non-traffic signs in advance of MSAs?*

*Would the display of brand logos on new, separate, non-traffic signs improve competition?*

*Do you think that the display of multiple brand logos at the side of the motorway would be a distraction to motorists?*

*Do you consider the display of advertisements within MSAs to be a problem?*

*What other means of providing information to road users could be used?*

*Should a symbol be included on MSA signs to indicate the availability of a picnic area?*

*Should the Agency establish clearer criteria for use in reaching decisions on signing to lorry parks located off the motorway network?*

*If so, what should the criteria be?*

*How else could the role of the private sector in the provision of improved facilities - particularly parking for lorries - be maximised?*

*Do you have evidence to support your views?*

### **Signing of MSAs**

- 2.3.1 Although the public were evenly split on whether sub-operator brand logos should appear on additional signs in advance of MSAs, serious concerns were expressed by some consultees. Some road users' groups were in favour of the proposal, expressing a desire that drivers be given adequate information about the brands available at each service area. Most of the MSA operators were also in favour. Other road users' groups were against the idea, believing that such signs would be either unnecessary or a distraction, or both.
- 2.3.2 The MSA operators were of the view that new signs displaying sub-operator logos would encourage drivers to stop: *'Increased consumer choice including renowned high-street brands will encourage drivers to take a break. However for choice to be effective drivers must be given adequate information about the services and amenities available at each MSA'* (MSA Operators Committee). RoadChef provided some substantiation: *'Since*

*RoadChef introduced the Costa Coffee brand to the header section on its main motorway information signs, transactions increased by between 20,000 and 25,000 per week'. Whether these figures indicate a greater number of stops overall or just purchases at those sites is unclear, though RoadChef argue that 'This effectively means that due to a more informative motorway sign, an additional one million vehicles a year are stopping and taking a break at RoadChef'.*

- 2.3.3 Several respondents made the point that MSAs are '*not in direct competition with each other, as depending on their reasons for stopping, motorists don't always have a choice of where to stop*' (Which?). It was also remarked that '*this conflicts with the concept that MSAs should not be a destination in their own right. Given that the spacing of MSAs is based on road safety considerations, why encourage drivers to pass up a chance to stop simply because they prefer another franchise holder*' (Gloucestershire County Council). Many respondents concurred that brand logos should not appear on signs for the reason that drivers should stop at service areas on the basis of need and not according to the brands available: '*The priority must be that motorists take rests when needed, commercial competition should not be a policy priority, the main concern is that motorists choose not to make [an] essential rest stop simply because of brand choice*' (Durham County Council).
- 2.3.4 There was some support for the display of fuel prices and brands in advance of service areas, following the French model. Electronic signs were considered the best way to display up-to-date information. '*The AA believes the Highways Agency should come forward with a strategy for information along the motorway network so that consumers can make the informed choices that would engender competition among operators which at present does not exist, hence high prices for petrol and diesel*' (Automobile Association).
- 2.3.5 Respondents were keen that existing generic symbols for facilities should be maintained, and were in favour of a new symbol indicating the availability of a picnic area. '*The success of MSAs in increasing consumer knowledge of their facilities does not make the generic symbols from the Vienna Convention "outdated". 30 million inbound visitors came to Britain last year and our emerging markets in Brazil, Russia, India and China provide highly significant potential for continued growth. These symbols are vital, universal symbols for international visitors. The success of these symbols should be celebrated, and extended to include picnic areas*' (Visit Britain).
- 2.3.6 Safety concerns were raised by a number of organisations and members of the public: '*RoSPA does not support commercial logos on motorway signs. There is little evidence that this would encourage more drivers to stop and take a break more often, and current symbols are widely understood. It may also result in some drivers deciding not to stop at service stations if they did not happen to like the particular commercial companies shown on the sign, but drive on to the next one in the hope that companies they prefer would be*

*operating there. We are also concerned that this change would act as a precedent for commercial advertising on road signs' (RoSPA). This was echoed by one MSA operator: 'We believe that the display of branded logos on separate signs may improve competition but that they are as likely to encourage a driver to drive on beyond their rest requirement, to reach the brand of their choice, as they are to encourage drivers to stop more frequently. We therefore believe that they may threaten road safety' (Westmorland Ltd).*

- 2.3.7 Driver distraction was a significant concern. *'Service should be of the same level regardless of who runs the site and the signs of a consistent lay out, not a free advert displayed to distract drivers regardless of their intentions to use the services or not' (Public respondent). It was further remarked that 'experience in the USA suggests that increasing brand signage just adds clutter that gets ignored' (Public respondent).*
- 2.3.8 Additional concerns were raised regarding the distance of signing from motorway exits, particularly if new sub-operator logo signs were to be introduced. A number of respondents requested information some distance (1 or 2 miles) prior to the exit, rather than the half-mile board as at present. *'At typical speeds, there would only be a few seconds within which a decision could be taken on the basis of the information shown, so that a manoeuvre to exit the motorway could safely be made. This hardly lends itself to a typical family discussion over whether this is the service area everyone wants to stop at or not!' (The Caravan Club).*
- 2.3.9 It was pointed out that existing signs can often be *'obscured for vehicles in the centre and right-hand lanes by large vehicles travelling in the left-hand lane' (Public respondent). This was echoed by the Association of Industrial Road Safety Officers: 'The Association feels that consideration should be given to count down markers for service areas being located in the central reservation. We appreciate that this is adding street furniture to the highway but often junctions and service area signs are masked by large goods vehicles'.*

### **Signing within Motorway Service Areas**

- 2.3.10 There were a number of complaints that signing within MSAs is confusing and even dangerous. *'The internal direction signage of MSAs can often be confusing particularly when it competes with advertising signs' (British Motorcyclists Federation). Further, 'navigating around motorway service stations is generally very difficult and often dangerous. It is common to have very worn white markings on the ground and very often right of way is not clear' (Public respondent). Given the safety function of MSAs, it was remarked that advertising should not be displayed in the approaches and parking areas: 'Too much visual clutter is distracting and unsafe. The environment within MSAs needs to be as restful as possible' (Public*

respondent). It was also noted that *'certain MSAs are using signposting that does not conform to the Vienna Convention. For example, at some MSAs one-way signs have a blue rim, a white field and a black arrow. This practice should be prohibited'* (Public respondent).

- 2.3.11 There was also a concern that advertisements sited within MSA sites may be a significant distraction to drivers if visible from the carriageway, and may also encourage last-minute decisions to leave the motorway. *'RoSPA shares the concerns that commercial logos visible from within the MSA site may encourage some motorists to make a very late decision to leave the motorway to enter the MSA, and to perform dangerous manoeuvres to do so'* (RoSPA).

### ***Signed HGV parking facilities located off the network***

- 2.3.12 There was agreement that off-line lorry parking facilities signed from the motorway should be located as close to the junction as possible: *'FTA members are concerned that the information provided by signage to HGV parking facilities focuses on those which are on, or near to, the Motorway Network to ensure that drivers would only have to take a short journey off the Strategic Road Network to find suitable parking'* (Freight Transport Association). It was argued that *'signage should avoid directing HGVs through residential and other sensitive areas'* (North West Regional Assembly).
- 2.3.13 It was remarked that signs should show adequate information as to the facilities available. *'There needs to be a consistent design of sign which gives directions, hours of opening and distance. Ideally it would also show, in real time, if space is available to avoid lorries getting there and finding that there is no space available. It is critical that they can be understood by drivers with limited knowledge of English'* (National Express Ltd).
- 2.3.14 There were varying aspirations as to the minimum standards, but availability of 24-hour secure parking with fuel, toilets and food provision was regarded as an ideal.

## 2.4 Issue 4 – Retail Activities at Motorway Service Areas

### Questions asked:

*Should the maximum level of permitted retail space at MSAs be set by the Government? If so what would be a suitable figure?*

*Would it be more appropriate for Government to restrict activities to those which are judged to serve the immediate needs of the travelling public, either combined with a higher floor area restriction, or with no restriction on floor area?*

*Should activities be restricted? If so what activities or services do you think would be appropriate at MSAs?*

*Do you have evidence to support your views?*

- 2.4.1 Most consultees argued that the restriction on maximum permitted retail space should remain as at present. The MSA Operators' Committee argued that *'the current 5000 sq ft limit of trading floorspace should be clarified to allow for 5000 sq ft on each side of a double-sided MSA'*, with Welcome Break arguing for an increase to 7500 sq ft per side and RoadChef for 10,000 sq ft per side. Moto, however, believe that the current limits are *'quite adequate to service the needs of the travelling public and that the provision of additional space is unnecessary'*. Marks & Spencer believe that a restriction on activities (such that an MSA should not become a destination in its own right) should be combined with a higher retail floor area restriction of 8000-10,000 sq ft *'so that retailers are able to provide the optimum retail environment for serving the travelling public'*.
- 2.4.2 Many respondents argued against increasing retail space at MSAs in order to prevent them becoming destinations in their own right, perhaps even *'out of town shopping areas'* (Association of Industrial Road Safety Officers). *'Reducing the need to travel and maintaining the vitality and viability of town centres are key Government concerns...Increasing the retail space and choice at MSAs will undermine these issues by encouraging MSAs as a destination in their own right'* (Gloucestershire County Council).
- 2.4.3 It was frequently argued that defining the 'immediate needs of the travelling public' is difficult and that a restriction on floor area rather than 'type of activity' would be more appropriate. However, most respondents were keen that *'the needs of the road user at MSAs should always be the priority over possibly more profitable "other" activities'* (Public respondent).
- 2.4.4 The availability of tourist and travel information was felt to be desirable and some consultees believed that this should take priority over retail: *'We found that shops were often cramped not because they were crowded with people, but because space was frequently taken up by bulky goods of a kind for*

*which travellers have questionable immediate need. This space could usefully be given over to more relevant non-retail use such as good tourist information, live traffic reports, internet access etc' (Which?). Such facilities were considered to have the potential to impact positively on both travellers and local communities.*

- 2.4.5 Views were mixed on the merits of substantial retail provision at MSAs. Several respondents noted that MSAs should be considered *'a public service [and] not a retail opportunity'* (Public respondent). *'Rather than more retail space, it would be preferable if some quiet, comfortable sitting and relaxation space could be specified as part of the facilities available'* (Public respondent). *'These are supposed to be rest areas so perhaps the hard selling of goods and services can be toned down and made less "in your face"'* (Public respondent). The desire for comfortable seating and a more relaxed atmosphere was common. One consultee argued for *'quiet areas where drivers can get proper rest so as to improve safety. These must also be secure and have comfortable seating. Too much of the space in most MSAs is filled with noise and not conducive to rest'* (National Express Ltd). One respondent wrote that *'I am disturbed by the number of motorway service stations with arcade games. Surely the last thing a relaxing motorist needs is a fast-paced arcade game'* (Public respondent).
- 2.4.6 It was stated that *'activities and services should be focussed on the needs of motorway users and, wherever possible, bring added value to local communities and economies. This could include offering locally-sourced nutritional food and drink, opportunities to exercise, and provision of a relaxing environment conducive to continuing the journey in a safe fashion'* (Co-operative Futures). The selling of *'quality local produce rather than just pre-packaged food'* (Which?) was desired by a number of respondents.
- 2.4.7 One MSA operator made a case for increased retail provision on the basis that it might encourage drivers to take a longer break: *'Our intention would not be to create destination retail but merely to expand dwell times by offering regular travellers services where they could do their shopping on the way home from work. Facilities such as these exist on the rail network and at airports and do not attract non-travellers – they simply allow busy consumers to conveniently purchase goods if and when necessary'* (RoadChef Ltd). This was echoed by one road users' group: *'By providing a more appealing retail environment, the viability of a service area could perhaps be enhanced, to the benefit of all users of the facilities. It could also be argued that by encouraging a little more time to be spent in the facilities, there is a consequent greater benefit to the break period generated by a service area stop'* (The Caravan Club).
- 2.4.8 There was little support for 'superior quality' facilities, such as toilets (supplementary to standard facilities) for which extra charges could be levied. *'Additional "superior quality" facilities should not be allowed to be used as an excuse by operators to downgrade quality of existing services'* (Visit Britain). The point was made more forcefully by a private individual: *'Wherever two-tier facilities exist, the lower level always becomes degraded'*

*and downgraded in order to force customers into paying more for the premium service. This is an offensive concept'* (Public respondent). However, there was a request for *'consideration to be given to providing "Changing Places Toilets" to cater for those people with certain medical conditions that require toilet changing and very clean facilities'* (Access Association).

- 2.4.9 The UK Metric association recommended that retail space should be expressed in m<sup>2</sup> rather than sq ft in the policy document. One respondent wrote that sq ft *'is an obsolete term, whose use for administrative purposes has not been permitted since 1995. Therefore, any future documentation, and proposed regulations, should refer to area in square metres, in line with government policy and UK and European regulations'* (Public respondent).

## 2.5 Issue 5 – Standards of Facilities

### Questions asked:

*Would the introduction of a system of inspections assist in maintaining consistent standards?*

*If so, should such a system be: a) self-regulating, or b) carried out by an independent organisation, and who might that be?*

*Should inspection cover all aspects of services offered equally or would there be benefit in focussing on certain aspects, for example facilities available to car or HGV and PSV drivers?*

*Are there other effective ways of facilitating improvements in services?  
If the criteria for MSA spacing were to be revised as discussed under Issue 2 it could lead to the development of further MSAs, in competition with existing sites.  
Would increased competition lead to improvements in standards?*

*Do you have evidence to support your views?*

- 2.5.1 Many public responses to the consultation concerned standards and value for money, though a large number of these were of a very general nature: *'All service areas to my knowledge are very poor – poor in quality of facilities and poor in value'* (Public respondent). This public perception was acknowledged by several consultees, the AA noting that the results of the 2001 and 2004 Eurotest surveys were disappointing, with UK consumers receiving *'poor value and quality at many of the MSAs inspected'*. They further commented that *'areas such as road safety, car parking, family friendliness, choice of goods in the shop, and friendliness of staff were often rated highly, but it was often the things that customers really care about, such as toilet hygiene, the quality of food and its price which were found to be poor. Many of these shortcomings are down to overcrowding and peak demand but also on occasions bad management, poor supervision, insufficient training and lack of motivation'* (Automobile Association).
- 2.5.2 Most respondents were in favour of a system of inspection, though there were no clear proposals for how it would function and by whom it would be provided. Suggestions included bodies such as the AA and RAC Foundation, though 'mystery shopping' was another favoured method. The consensus was that if a system was established, inspections would best be performed by an independent body. Visit Britain, the national tourism agency, stated *'The quality of services is vital to making the visitor welcome. Visit Britain would be happy to discuss and explore issues of inspection and quality assurance with the Highways Agency and the Department for Transport'*.



- 2.5.3 The MSA operators remarked that their sites are already subject to a series of inspections (by petroleum and public health authorities, for example), in addition to the investigations conducted by consumer groups and the Eurotest survey. One individual remarked that *'I suspect that, from experience in other places, existing inspections are uncoordinated and inconsistent. A single body needs to be given the responsibility for ensuring that all aspects of the activity of an MSA are up to standard whatever authority happens to carry out inspection of a particular facility'* (Public respondent).
- 2.5.4 The maintenance of quality services was seen as an important safety issue, but there were also concerns that a publicised grading system could act against the safety function of an MSA with drivers potentially choosing not to stop at a poorly-graded site, despite needing to take a break. The Royal Society for the Prevention of Accidents argued that *'The standard and quality of MSAs is important as motorists are less likely to stop if the quality of the service and facilities they receive is poor'*. However, they stated that competition may achieve improved standards without an inspection programme. The Association of Industrial Road Safety Officers expressed concerns that *'whilst a star rating system might improve competition we must remember that first and foremost these areas are provided for safety reasons and a poor star rating could lead to drivers failing to stop at a critical time'*.
- 2.5.5 There was support for an inspection system from disabled road users' groups, including Mobilise and the Disabled Persons Transport Advisory Committee: *'We believe that such inspection regimes would help fulfil the obligations on the Highways Agency under the Disability Equality Duty. We agree that an external organisation should carry out these inspections, in preference to self-regulation, and that inspections should include assessments by appropriately trained staff of the accessibility of the facilities to disabled people. Finally, we would expect the Highways Agency to publicise the results of the inspections'* (Disabled Persons Transport Advisory Committee).
- 2.5.6 Consumer groups such as Which? and the Office of Fair Trading were also supportive of an inspection system: *'In addition to improving information for consumers, and hence competitive pressure, a grading system may act as a benchmark for quality standards and levels of service against which MSAs strive to achieve. Overall, we consider this should lead to increased pressure on MSAs to improve standards of the facilities offered'* (Office of Fair Trading). It was argued, however, that such a system would not tackle one of the main consumer complaints – that of price: *'Inspections and "star" rating systems will do little to solve a fundamental problem, however: what is for sale at MSAs is unreasonably expensive because there is no competition and the market in this area is failing consumers'* (IAM Motoring Trust).
- 2.5.7 It was felt that inspections should take account of the needs of all road users, including the specific needs of certain categories of user, including commercial drivers, disabled persons, motorcyclists, caravan and

motorhome users, and coach customers: *'The basics apply to all types of operation but there are certain specific needs for some categories of users. Commercial drivers may need to have a legal break or want to have full wash or shower. Coach customers need to be able to be served quickly and for there to be enough toilet facilities to deal effectively with large numbers in a short time'* (National Express Ltd). *'The aim should be to cover all aspects of services provided for service area users. Where there are relatively few users of a particular type, e.g. HGV, the scope could be adapted accordingly'* (RAC Foundation for Motoring). *'It is very hard to grant an approval to one aspect of an outlet and make it clear that this may not reflect the standard of all facilities on that site'* (The Caravan Club).

- 2.5.8 None of the MSA operators were in favour of an inspection system: *'the market should "vote with their feet"...self-regulation and healthy market competition – both between MSAs and within the MSAs themselves (i.e. between sub-contractors) – continues to drive up standards and the quality of services, thereby increasing turn-in and helping to improve road safety'* (MSA Operators Committee). Individual operators felt that *'the best way to ensure improvements is to lay the foundations of a more competitive, flexible and attractive industry'* (Westmorland Ltd), and to *'create the necessary conditions for greater investment by the private sector'* (Welcome Break Ltd).
- 2.5.9 Increased competition was not universally acclaimed as a facilitator of improvements in quality. There were some calls for the focus to shift from competition to cooperation: *'By becoming more cooperative and less competitive, we can move away from growth for growth's sake – perhaps the most environmental destructive pattern of business behaviour on the planet – and take our connected world into a softer and more enlightened era'* (Central Scotland Roads Accident Investigation Unit). The desirability of new models of service provision was also stressed by Co-operative Futures: *'Improvements in standards can be delivered by increasing choice, but only if it involves new entrants in the sector with a commitment to quality and a sustainability agenda. What is required to revitalise the industry is, not more of the same from the same three major operators, but what independent/social enterprise providers can deliver'*.
- 2.5.10 The potential for MSAs to participate in wider Government policy on healthy eating, local communities and tourism was highlighted by one respondent: *'There is a lack of "joined-up government" here. The Department of Health is trying to improve our health (and reduce the burden on the NHS) by encouraging healthy foods, the DfES is helping children's development in a similar way, and DEFRA with DCLG and the DTI are promoting the tourist industry which is so vital to our economy especially in rural areas. But what we see at British MSAs is a rapid proliferation of ugly burger chains whose food is tasteless and full of sugars and trans-fats with no alternative on offer, lavatories moved as far as possible from the entrance so that children have to pass stands loaded with chocolate and crisps to get there, and standardised goods which might as well as well be in Idaho or Nebraska as in Devon or Durham (as well as shouty logos everywhere)'* (Public respondent).

## 2.6 Issue 6 – Park and Ride/Park and Share Facilities

### Questions asked:

*Should formal park and ride and/or park and share operations be permitted at MSAs?*

*Should formal coach stop / interchange operations be permitted at MSAs?*

*If so, what other measures would be necessary to ensure that they did not compromise the safety function of the MSA?*

*Do you have evidence to support your views?*

- 2.6.1 The suggestion that MSAs could be used for formal park and ride or park and share schemes aroused interest and some very positive support, but there were a number of qualifications. The MSA operators were supportive of the idea, but stressed that any funding would have to come from the Government or local authorities: *‘MSA operators are happy to be the facilitators for Park & Ride/Share schemes but will not be able to fund such schemes themselves. However, if Government or local authorities could provide the capital required, MSA operators would be willing to manage them’* (MSA Operators Committee).
- 2.6.2 It was frequently noted that the establishment of any schemes should not compromise the provision of refreshments, toilets, fuel and rest facilities and that parking for schemes would have to be over and above existing provision.
- 2.6.3 There was a concern that attracting drivers to Park and Ride would generate congestion at MSAs: *‘We would not wish to see increased congestion and tailbacks that act to the detriment of the visitor experience, but would welcome convenient interchange points where these increase efficiency in travel’* (Visit Britain). It was also suggested that *‘attracting people to Park and Ride from existing public transport services should be avoided as this would increase the number of car trips on the network’* (North West Regional Assembly).
- 2.6.4 An issue was raised in relation to access MSA sites from local delivery (rear access) roads. It was suggested that establishing Park and Ride schemes at MSAs might *‘encourage people to use the local delivery roads to enter and leave the site. Within our area a robust and effective system has never been found to stop the undesirable movement, and legislation is unable to deal with the issue’* (Wiltshire Police).
- 2.6.5 An additional security issue relates to long-term parking: *‘It is likely a separate area with different times/costings needs to be set up for park/ride – park/share. These areas would have to be monitored and secure or it could*

*lead to being a target area for theft of/from motor vehicles'* (West Mercia Constabulary).

- 2.6.6 The Association of Industrial Road Safety Officers raised the problem of on-line sites and the inability for motorists to cross from one side of the motorway to the other in order to continue a journey.
- 2.6.7 A number of lorry drivers and industry representatives made arguments against Park and Ride schemes. There was a worry that additional parking for schemes would impose upon already stretched HGV parking provision (Freight Transport Association). It was stated that *'MSAs are already grossly overcrowded, and the slip roads exits and entries would be increased alarmingly causing a potential RTA [Road Traffic Accident] problem'* (Professional Drivers Association). The British Association of Removers made a similar case. There was also a suggestion that *'Park and Ride would just generate more long distance commuting'* (Public respondent).
- 2.6.8 A number of respondents, including the Royal Society for the Prevention of Accidents suggested that a trial scheme should be established prior to a more extensive roll-out.
- 2.6.9 There was some discussion as to whether Park and Ride/Park and Share schemes would breach the principle that MSAs should not be 'destinations in their own right'. Although some were concerned about this, it was suggested that *'such schemes we feel would not make MSAs destinations in their own right; by the very name of such schemes, Park and Rides are about parking in order to ride to the destination'* (Peak District National Park Authority). A coach operator already using an MSA as an interchange argued that such a use does not breach the principle: *'For something to be a "destination in its own right", we contend that somebody has to make a journey they would not otherwise have made to visit the destination, because of some special facility available at the destination... Only a journey which starts and ends in the same place and visits an MSA for a purely retail purpose can be said to be using the MSA as a "destination in its own right"'* (Alfa Coaches Ltd).
- 2.6.10 Several respondents remarked on the potential of using MSAs as coach interchanges or for park and ride/share to contribute to wider sustainability objectives: *'Motorways and MSAs are generally perceived as having a negative impact on the environment and on local communities; making them part of a coherent sustainable transport strategy – in terms of environmental, social and economic impacts – would provide a real opportunity to redress this balance and give them a positive role to play'* (Co-operative Futures). The Disabled Persons Transport Advisory Committee suggested that *'provided the coaches are accessible and are complemented by accessible infrastructure, such a concept has much to offer in promoting Green Travel and enhancing travel opportunities for disabled people'* (Disabled Persons Transport Advisory Committee).
- 2.6.11 Coach operators were also keen to stress the potential environmental benefits of out-of-town interchanges: *'We strongly believe that there are a*

*number of locations where by doing so coach services would no longer have to serve city and town centres which would save fuel and help our carbon footprint'* (National Express Ltd). The company also believe that such operations would be viable, stating that research had '*identified a large untapped market which would respond to having non central stop locations where a wider range of destinations could be offered with more direct routes initially just making better use of existing services*'. Another operator argued that '*the interchanges are necessary in order to minimise coach movements, and hence road traffic, in the context of providing customers with the maximum possible amount of holiday choice*' (Alfa Coaches Ltd).

- 2.6.12 There were concerns that operating Park and Ride schemes at MSAs would have a negative environmental impact: '*Whilst "park and ride" can work very well, are motorway service areas (which are usually found in the open countryside) the best locations for future sites? This issue needs to be considered on a "case by case" basis with the local planning authorities*' (Public respondent).

## 2.7 Issue 7 – Motorway Picnic Areas

### Questions asked:

*Subject to the outcome of a trial picnic site, should picnic areas be developed between MSAs?*

*Should lorries be allowed to park in picnic areas? If so, how should this be managed and if not, how should that be managed, for example, should there be separate lorry parking picnic areas?*

*Where land is available should existing MSAs provide picnic areas?*

*Should the availability of a picnic area be shown on signs for MSAs?*

*Should picnic areas be open for use at all times or only during certain periods such as the hours of daylight?*

*Do you have evidence to support your views?*

- 2.7.1 There was significant support for the development of picnic areas between MSAs, particularly from individual members of the public: *‘The French motorways have major service stations at roughly 40km intervals, which is comparable with the British. But they also have “Aires de Repose” with toilets, picnic tables and (quite often) children’s play areas where you can just stop and have a break. These are often calmer and more relaxing places to be than the busier service stations’* (Public respondent). *‘What I want is a stopping area separated away from the Motorway/Trunk Road where I can relax, stretch my legs, sit at a table to have a drink or have a picnic and, if I have children, give them the chance to stretch their legs without the close danger of fast moving traffic’* (Public respondent).
- 2.7.2 There were a number of reservations expressed, however, concerning both the financial viability of such sites and their potential to attract anti-social behaviour: *‘Picnic areas can be attractive for family and group outings. But the reality of certain types of anti-social behaviour being attracted by such sites might make the upkeep and management of them expensive so adequate commercial operations would need to exist if they were to be self-financing’* (Visit Britain). It was, however, pointed out that anti-social behaviour and crime exists equally at current MSAs: *‘Instances of fuel and other theft for example, while drivers are taking daily rest in vehicle bunks, have become common in some areas’* (Confederation of Passenger Transport UK).
- 2.7.3 MSA operators and several other respondents stated a preference for (further) developing picnic sites at existing MSA sites rather than establishing new on-line picnic areas. This would reduce the need for new junctions which would cause *‘an increase in vehicles leaving and entering*

*the motorway* (RoSPA). Further, new, independent picnic sites *'will need a significant commercial element to pay for their servicing and maintenance. If the private sector were invited to build them they would need MSA-scale catering and retail to derive even a modest return. As happened previously there would always be pressure to extend the commercial element of the picnic site into a full MSA in time'* (Westmorland Ltd). This operator also noted that *'a picnic site associated with an MSA would be more likely to be kept clean and well maintained'*.

- 2.7.4 There was an evident fear amongst operators that new picnic sites would damage their businesses: *'we are clearly concerned that the provision of additional unmanned rest areas with no provision for 24 hour coverage will create a competitor which will undermine MSA operators who currently provide a free range of staffed and maintained 24 hour services'* (RoadChef Ltd).
- 2.7.5 The operators noted that increased provision would in many cases depend on the availability of land: *'The MSAOC would like to see the HA (where the land is owned by it) and local authorities enable the development of surrounding land so that operators can provide such picnic areas in the first instance or enlarge them if they are already present'* (MSA Operators Committee).
- 2.7.6 Lorry drivers and bodies representative of the freight industry were keen that lorries be allowed to park at picnic sites, although this was opposed by a number of other organisations and some members of the public. The Road Haulage Association noted that *'the advantage of picnic sites would be that they provide facilities to encourage drivers to stop for a break on stretches of motorway where it is not feasible to provide a full MSA'*. It was acknowledged by most advocating lorry use of picnic sites, however, that lorry parking should be kept separate from car parking. This was a point emphasised by industry representatives at the Stakeholder Event.
- 2.7.7 It was clear that the desire to allow lorries to park at picnic areas reflected merely a need for additional lorry parking provision, rather than drivers' desires for a particular kind of facility: *'By the very nature of a "picnic area", there would appear not to be any real need for lorries to be accommodated as it is rare for lorry drivers to "picnic". Adequate facilities for lorry drivers are/should be provided at MSAs or rest areas/lorry parks'* (Leicestershire County Council).
- 2.7.8 Although there was widespread recognition that opening hours for picnic sites might have to be restricted in order to limit the risk of anti-social behaviour, there was a worry that night-time closure would see sites fail to achieve their full road safety potential: *'Drivers are usually at their most tired in the evening, especially when driving home from work. A picnic site which would only be open during the hours of daylight and would not serve those drivers at the highest risk of sleep related accidents'* (RoadChef Ltd).

- 2.7.9 One alternative to an unmanned rest area (short of a full MSA) was suggested '*A rest area linked to a filling station would be more likely to provide a safe environment to encourage people to stop and rest, rather than just an isolated rest area which people would be reluctant to use*' (Automobile Association).



## 2.8 Issue 8 – All-Purpose Trunk Road Service Areas

### Questions asked:

*Should All-Purpose Trunk Road Service Areas be required to provide more or fewer facilities?*

*Should All-Purpose Trunk Road Service Areas provide picnic areas?*

*How could the service which they offer be improved?*

*What is an appropriate interval for signed all-purpose trunk road services?*

*If an All-Purpose Trunk Road Service Area or other facility ceases to operate should any further use of the site be restricted to activities which serve the immediate needs of the travelling public?*

*Do you have evidence to support your views?*

### **Provision**

- 2.8.1 There was agreement that the suggested interval of 15 miles or 30 minutes driving is reasonable, but it was often remarked that the availability of other nearby facilities should be taken into account: *‘The need for service areas on all-purpose trunk roads is more dependent on site-specific factors than on motorways since there may already be adequate facilities in the vicinity that avoids the need for special provision’* (Public respondent).
- 2.8.2 The potential for new service areas to impact negatively on local business was also noted: *‘Approval of a new All-Purpose Trunk Road Service Area must take account of other local facilities both on the road and adjacent (such as in by-passed villages). It must not be seen to undermine those facilities’* (Public respondent).
- 2.8.3 There was, however, some concern that local objections could lead to the rejection of needed sites: *‘The Association believes that, rather like the provision of MSA facilities for freight, this is an issue which is broader than the provision within local planning regimes and that the Government has a responsibility to ensure that appropriate facilities are provided for all vehicles, including the adequate provision of HGV parking’* (Freight Transport Association). It was suggested that service areas could make a positive contribution to local communities: *‘Modern rest facilities should be viewed as a 21<sup>st</sup> Century Coaching House. Like the original premises, they were an integral part of the local community fabric and would not be able to sustain themselves on any one part of the business; hence they were the destination of local persons as well as coach parties seeking refreshments’*

and accommodation on long and arduous journeys' (Road Haulage Association).

## **Facilities**

- 2.8.4 It was widely agreed that the existing minimum requirements for signed All-Purpose Trunk Road service areas, as set out in Annex J of Circular Roads 4/94, are adequate, although some concerns were expressed. One operator argued that the same criteria should apply as for Motorway Service Areas: *'RoadChef would like to contend that such sites should be subject to the same regulations so not to allow them a competitive advantage over MSAs...By applying consistent regulations to MSA operators and trunk road services, the HA will encourage drivers to remain on the motorway network and thereby increase road safety'* (RoadChef Ltd).
- 2.8.5 It was noted, however, that there would be little incentive for sites to offer more facilities than at present: *'It is hard to understand why an operator would wish to provide these as the only added benefit to them would be having approved HA signing. Demand is normally much lower on such roads and, as has been shown with chains such as Little Chef, the market is struggling'* (National Express Ltd). It was suggested that to be too prescriptive would ignore the fact that All Purpose Trunk Roads have varying functions, with users' needs varying considerably: *'The decision on the facilities to be provided on Trunk Roads should be related to the nature of the road, and whether they are used as long distance routes. For instance the A34, A12 and A14 are long distance routes, used as if they were motorways (some even have junction numbers) and the services should be of a similar standard. On other routes the requirements are lower'* (Public respondent).
- 2.8.6 There were some specific requirements stated, including a desire for more *'parking suited to large vehicles'* (British Association of Removers) and facilities for motorcyclists: *'Operators should be encouraged to provide facilities for motorcyclists, who need a safe place to rest, and possibly lie down, (for example, recliner chairs) and somewhere to store their helmet'* (RoSPA).

## **Standards**

- 2.8.7 There were some significant concerns regarding the quality of some roadside facilities on All Purpose Trunk Roads. *'There should be a more stringent requirement to provide quality facilities, and publicising these requirements to aid compliance. Such services often have poor toilet facilities, which are not readily available, e.g. users have to walk through restaurant areas, permanently locked or plain dirty and un-hygienic'* (Wiltshire Police). *'Parking areas are usually of hard standing material and not asphalt and are often uneven, rutted and waterlogged. Most are poorly lit and offer very little in the way of secure parking facilities'* (Project Co-ordinator, Drinks Industry Project Scotland).

- 2.8.8 There was some pressure for facilities to be available 24 hours a day: *'All too often our Members find that although signed as a "services ahead" the toilets are inside and access is denied at night, no refreshments are available out of hours, only fuel, and that the only parking area is on the fuel pumps. We also think they should provide picnic areas, and the services could be improved by offering ALL of the facilities 24 hours a day'* (Professional Drivers Association).

### **Closure of sites**

- 2.8.9 Many respondents agreed that when a facility ceases to operate further use of the site should be restricted to serve the immediate needs of the travelling public: *'National policy should...clearly prevent closed service areas becoming vehicles for getting all purpose of development in the countryside. In many cases the redevelopment opportunities for redundant sites should remain very limited'* (Durham County Council). It was suggested that *'restrictions need to be put in place to avoid property speculation/alternative development unless all other avenues have been thoroughly exhausted'* (British Association of Removers).
- 2.8.10 On the other hand it was argued that where a site had proved to be commercially unviable, there would be little chance that an alternative operator would be found: *'It may be that the facility was in the wrong location. A careful study of demand must be taken'* (WA Shearings). It was suggested that each site should be considered individually: *'If one operator has not been able to make a commercial success then it is unlikely that another will be able to do so. Therefore there should be no restrictions pre-prescribed and the matter should be left to the local planning authorities'* (National Express Ltd).

## 2.9 Issue 9 – Provision and Use of Lay-bys

### Questions asked:

*Should the use of lay-bys for trading be restricted?*

*If so, what criteria should be applied in deciding the locations where trading is permitted?*

*How best might trading in lay-bys be controlled?*

*Do you have evidence to support your views?*

- 2.9.1 Most respondents agreed that trading in lay-bys should be controlled for safety, hygiene and/or environmental reasons: *‘Laybys are intended to provide a site where road users can stop safely, usually for a brief break. Many are unsuitable for the inclusion of trading facilities which tend to increase the length of stops and the demand for space with an increasing risk of compromising safety’* (RAC Foundation for Motoring).
- 2.9.2 The problem of litter was a significant concern for some respondents: *‘Litter is often cited by visitors to Britain as one of our bad points so locally-licensed operators of burger vans etc seem to be a good idea given that local authorities on the ground will be best placed to decide on local matters such as litter provision. We would support the Highways Agency having an advisory role and would also consider a HA veto on laybys it deems inappropriate for such activities for reasons of efficient traffic management/preventing gridlock’* (Visit Britain). *‘Many laybys have no provision for litter disposal by the drivers of vehicles using the layby, with the result that not only do most laybys smell of urine, many of them are overwhelmed with litter’* (Public respondent).
- 2.9.3 On the other hand, it was argued that the availability of refreshments would encourage drivers to take a break: *‘The use of laybys for provision of light refreshments should be encouraged and controlled, not restricted’* (Public respondent). *‘Stopping mobile traders using lay-bys will deprive drivers of a service they need, and one that is not readily available on many sections of trunk road. Taking action to stop trading in lay-bys may remove a potential hazard, but the overall effect may well be negative because drivers will not be encouraged to take a break’* (IAM Motoring Trust).
- 2.9.4 The main criteria suggested for deciding where trading could be permitted was safety. *‘The operation of the site should not compromise safety on the road. There should be sufficient parking space for the demand and vehicles should be able to enter and leave, and move within, the site safely’* (RAC Foundation for Motoring). It was also remarked that the availability of alternative provision nearby should be taken into account (Westmorland Ltd).

- 2.9.5 There was some concern that where trading is permitted, there should be adequate hygiene provision: *'...there should be no catering establishment without toilet/handwashing facilities'* (Public respondent). The desirability of toilet facilities was noted by several HGV drivers responding: *'It is essential that toilet facilities should be provided at least on major laybys, even if of chemical nature rather than plumbed –in. After all, the law now requires toilet facilities to be provided on construction and major road works sites, so why not on busy laybys'* (Public respondent).
- 2.9.6 Respondents agreed that the Highways Agency should work with Local Authorities to identify laybys where trading may safely be carried out: *'The most effective solution would seem to be that the Highways Agency and Local Authorities work together to operate a trading licence scheme'* (RoSPA). *'We should welcome control of trading through 'controlled streets' designation by local authorities cooperating with HA on lay-bys likely to be attractive to mobile traders. This should be a minimum length to allow continued use by cars, vans, lorries, and coaches, and kerbed segregation from main carriageway. Some use for tourist information, and public conveniences is justified. A 20 minute maximum layover is no longer fit for purpose as drivers' hours restrictions requires a minimum break of 30 minutes'* (Birmingham City Council).
- 2.9.7 A number of respondents desired to see additional laybys provided on the network. *'More laybys just of motorway junctions would make it possible for people to share journeys'* (Public respondent). *'The more places to stop, the less people will illegally try to use their mobiles. Laybys are overfilled because there is often no alternative. The dilemma is to park somewhere considered sub-standard or break the law and risk your livelihood'* (Public respondent).
- 2.9.8 It was remarked that laybys provide an unsatisfactory but necessary parking facility for HGVs: *'The need for lorries to park in lay-bys often arises due to the lack of suitable inner city/town facilities for overnight parking of such vehicles – which may have to deliver to town shops/industrial sites or residences early the next morning early because of High Street load/unload restrictions or other parking restrictions/times'* (British Association of Removers). *'Driver hours have a habit of getting in the way of drivers needs always at the wrong moment. With the decreasing numbers of transport cafes offering overnight parking as well as many industrial areas refusing to accommodate the driver. Commercial drivers are all too often forced to drive until they have to stop. Often in a lay-by, which is usually not the safest place to park'* (Heavy Commercial Vehicle Route Manager, Cambridgeshire County Council).
- 2.9.9 Given the widespread use of laybys for lorry parking, drivers expressed concern at safety and security: *'without some sort of proper barrier at night preventing other vehicles or a camera system then any truck parking overnight will be at high risk of load theft or criminal damage'* (Public respondent). *'Police should visit such areas more often to improve security measures. Hard verges should be provided to avoid the verges turning into*

*mud-banks/garbage pits. More waste disposal containers/apparatuses should be available. Lighting should be made available in all lay-bys. The width of many lay-bys could/should be extended to make sure that large vehicles are at an adequate distance from the main road and for vehicles to manoeuvre without disturbing the flow of traffic on the main road* (British Association of Removers).

- 2.9.10 The Disabled Persons Transport Advisory Committee expressed concerns *'about the safety aspects relating to laybys and the protection of people using them. We believe that laybys should be segregated for the carriageway by a kerbed island. This of course means that the layby then has to be wide enough to allow moving vehicles to pass those that are parked. However, this extra width would also help in accommodating the needs of disabled travellers disembarking and embarking vehicles'* (Disabled Persons Transport Advisory Committee).
- 2.9.11 One respondent noted that *'lay-bys on busy trunk roads represent a hazard because deceleration lanes, parking area and acceleration lanes are not demarcated. Thus, if there is more than one vehicle in the lay-by, other vehicles cannot easily accelerate before rejoining the main carriageway... the lay-by should have clearly defined deceleration, parking and acceleration areas, with the parking area separated from the main carriageway by kerbstones'* (Public respondent). This was echoed by the IAM Motoring Trust who cited a joint AA Foundation for Road Safety Research/Highways Agency study recommending that motorists should pull into laybys only in an emergency, identifying them as *'potentially the most dangerous places on a main road'* (IAM Motoring Trust).

## 2.10 Summary of Additional Points Raised

### ***'Destination in its own right'***

- 2.10.1 Although there was widespread agreement that MSAs should not become 'destinations in their own right', there was some desire that the principle could be clarified, giving 'objective' criteria *'as opposed to the current subjective approach'* (Road Haulage Association). The responses from both the MSA Operators Committee and Alfa Coaches spoke at length about the need to define this principle thoroughly. However, Transport for London urged caution against being too prescriptive: *'It would be desirable that the final policy framework does not preclude opportunities for utilising MSA within future Integrated Transport Planning solutions; or for securing contributions toward investment in such solutions'*.

### ***Lorry Parking***

- 2.10.2 The availability of lorry parking spaces and facilities for drivers was one of the issues most frequently raised. It was also subject to extended debate at the Stakeholder Event. It was clear that the issue was particularly pressing in the south, and responses from the Dover Harbour Board and Kent County Council stressed this point, the latter pointing to a nightly shortage of 550 parking spaces. One reason cited for this was the high cost of land, and lack of commercial viability of lorry parks: *'The commercial impetus for establishing official lorry parking facilities is negligible...It is extremely hard for the private sector to make a lorry park viable when there will be a lack of fuel sales, drivers do not wish to pay and many HGV cabs are fully equipped anyway'* (Dover Harbour Board).
- 2.10.3 In addition to parking spaces, drivers themselves remarked on the need for adequate toilet and shower facilities, food, and security: *'We need to go to the toilet, to get a shower, to be able to eat at a reasonable price. We need taps that turn on and stay on, that give us HOT water to remove grease etc. We need COLD water with which to clean our teeth, in fact what we need, in addition to showers, are HGV Drivers washrooms accessed by the payment of a returnable deposit. We need some sort of security when parking overnight to reduce the amount of crime presently on all MSAs'* (Professional Drivers Association). A number of drivers remarked on the need for separate facilities: *'A driver is given 45 minutes every 4.5 hours of driving in which to have a break. If they need a hot meal they do not have the time to stand behind a load of coach passengers, or any other vehicle group user'* (Cambridgeshire County Council).
- 2.10.4 The Road Haulage Association argued that new lorry parking sites *'should be developed to security standards agreed by the ACPO/BPA Safer Parking Scheme'* and remarked that existing sites should be encouraged to meet these standards. At the Stakeholder Event, it was suggested that liaison with

insurance companies to compel drivers to park in secure, managed parking facilities could increase the financial viability of such sites.

### **Motorcycles**

- 2.10.5 Although there were no public responses referring to facilities for motorcycles, the British Motorcyclists Federation expressed concern that the consultation document did not mention providing for the specific needs of motorcyclists. BMF noted that the Government's Motorcycling Strategy, published in 2005, stated that the Highways Agency *'will ensure that the particular needs of motorcyclists are taken into account, where appropriate, on the motorway and trunk road network'* (The Government's Motorcycling Strategy, 2005). Specific requests included signed, accessible, flat parking areas *'able to support side and centre stands'*, situated close to the facilities for security and *'since it is inconvenient for riders to walk from the far side of the car park clad in protective clothing'*. It was suggested that security could be enhanced *'by the use of appropriate street furniture such as a fence with a hitching rail to which motorcycles can be secured'*. It was acknowledged that *'some MSAs already provide motorcycle parking'*. BMF also sought the provision of facilities to store protective clothing: *'It would be desirable if lockers were provided to store helmets and clothing to facilitate easier use of lavatories and taking a proper break for refreshments and a rest'*.

### **Caravans and Motorhomes**

- 2.10.6 There were a significant number of public responses concerned that caravans and motorhomes were not specifically considered in the consultation. There was some complaint that overnight parking at MSAs incurred a charge, while some respondents sought better controls over the use of designated parking for caravans: *'almost all the official service areas I have used have inadequate space, usually filled by HGVs, and often it is hopelessly signed, and sometimes is just an unsurfaced pot-holed "field"'* (Public respondent). Caravan and motorhome users also mentioned facilities for dumping waste, and the availability of fresh water and electricity. There was some concern that some caravan parking at MSAs should be available close to the facilities for disabled users: *'I have yet to find a service area in England or Wales with provision for parking a car and caravan within our limited walking distance of the facilities'* (Public respondent).

### **Disabled access**

- 2.10.7 There were some comments regarding disabled access to MSA facilities. One respondent noted that facilities are often too far away from the car park with poorly designed and planned walkways and no steps for disabled people to use. The respondent also remarked that disabled people may require easily accessible free water to help them take medication.



## **Air and Water**

- 2.10.8 Two respondents argued that air and water should be available free of charge, and complained at the charges sometimes levied for these facilities: *'Given the already extortionate prices at service stations I think it is unreasonable to charge for safety items such as air & water'* (Public respondent).

## **Litter**

- 2.10.9 There were some complaints about litter at roadside facilities. ENCAMS advised that *'any enhancement in the provision of service areas and roadside facilities be accompanied by an increase in sustainable waste practices, public awareness campaigns to promote an anti-littering message, appropriate infrastructure to dispose of waste, and enforcement'*. Specific measures could include recycling bins, public awareness campaigns, adequate litter bins, high quality public toilets, and partnership working with local authorities with *'clear lines of responsibility for roadside cleansing and a commitment to maintain standards to the highest possible levels'*.

## **Pricing**

- 2.10.10 Many public responses, particularly in the first few days of the call for evidence, were concerned with pricing. Although this was not an issue addressed specifically in the document, it exercised many respondents. The AA noted that *'It is government policy that the entire cost of constructing and operating an MSA should fall on the operator despite the fact that the underlying philosophy for MSA provision is road safety. The effect is that all costs are borne by those motorway users who pay at the till and the pump. In effect people who stop at an MSA and buy food, products or fuel subsidise those who do not. This goes some way in explaining why UK MSAs have the highest prices in Europe, particularly for restaurant meals'* (Automobile Association).

## **Rear access**

- 2.10.11 It was noted by one respondent connected to the Cyclists Touring Club that access to MSAs is an issue of significance for cyclists, and particularly the workforce: *'Many service areas are within cycling distance of towns and cities where the workforce live, and with 24-hour shift working, the operators of such sites either have to discriminate (illegally?) by requiring the employees to have to drive to work, or provide a workers bus service, or penalise those who do not drive with the cost of hiring a taxi reducing their daily wage.'* (Public respondent).

## **Information Points**

2.10.12 Several respondents argued for the introduction of information points at MSAs for journey planning and travel advice.

## **Role of the private sector**

2.10.13 A couple of respondents questioned whether it should be the responsibility of the private sector to provide roadside (and particularly lorry parking) facilities. *'Is this really a job for the private sector when you consider how much the motorist contributes to the exchequer through vehicle excise duty and other forms of indirect taxation'* (Public respondent). There were few suggestions on maximising the role of the private sector, other than to introduce some form of incentive to encourage provision of sites within new developments (RAC Foundation). RoadChef remarked that *'MSA operators currently provide services for HGVs. We are currently prevented from extending our services to cater for increased numbers of HGVs as we are restricted from increasing the size of our parking facilities by local planning authorities...RoadChef would consider extending the number of spaces available to HGV drivers if certain incentives (such as fiscal incentives) were applied in order to meet the increased cost'*. It was further suggested that *'all new industrial parks should have to provide lorry parking areas as a condition of planning'* (Public respondent).

### **3 Future Steps**

- 3.1 Now that the call for evidence has closed the next step in the policy review process is the preparation of firm policy proposals which will take into account all responses to the call for evidence alongside other available evidence. Those policy proposals will be subject to a public consultation, during which time respondents will be able to express opinions and make suggestions as to how the policy might be improved. The responses to this will be reviewed and revised policy guidance will be issued in the form of a new circular later in 2007.

## Appendix - List of Respondents

### Organisations

Access Association  
Alfa Coaches Ltd  
Association of Industrial Road Safety Officers  
Automobile Association  
Birmingham City Council  
British Association of Removers  
British Motorcyclists Federation  
Cambridgeshire County Council  
Central Scotland Roads Accident Investigation Unit  
Channel Corridor Partnership  
Cheshire County Council  
Communities and Local Government  
Confederation of Passenger Transport UK  
Co-operative Futures<sup>1</sup>  
Department of Culture, Media and Sport  
Disabled Persons Transport Advisory Committee  
Dover Harbour Board  
Drinks Industry Project Scotland (DIPS)  
Durham County Council  
East Midlands Regional Assembly  
Encams  
Freight Transport Association  
Gloucestershire County Council  
IAM Motoring Trust  
Kent County Council  
Leicestershire County Council  
Marks & Spencer  
Mobilise Organisation  
Moto Hospitality Ltd  
MSA Operators Committee  
National Express Ltd  
North West Regional Assembly  
North Yorkshire Police  
Office of Fair Trading  
Peak District National Park Authority  
Professional Drivers Association

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<sup>1</sup> The Co-operative Futures response was also endorsed by Gloucestershire Neighbourhood Projects Network, David Drew MP (Stroud), Forum for the Future, RISE, Gloucestershire Land for People, Gloucestershire Accident Prevention Group (including the County Council Road Safety and Trading Standards Departments, the Police Traffic Division and Road Safety Unit, Gloucestershire Fire and Rescue Service, the Health and Safety Executive and the Primary Care Trust), Development Trusts Association – South East Region, Gloucestershire Neighbourhood Needs, Co-Active Ltd, Business Link Gloucestershire, Carlos Ordonez (consultant), John Down (consultant), Martin Horwood MP (Cheltenham/Liberal Democrat Shadow Environment Minister), Midcounties Co-operative Retail Society.

R O A D (Research on Attacked Drivers) Campaign  
 RAC Foundation for Motoring  
 Road Haulage Association  
 RoadChef Ltd  
 Royal Society for the Prevention of Accidents  
 South East England Regional Assembly  
 Surrey County Council  
 The Caravan Club  
 Transport for London  
 Transport Wales  
 Truck & Driver Magazine  
 UK Metric Association  
 Visit Britain  
 WA Shearings  
 Welcome Break Group Ltd  
 West Mercia Constabulary  
 Westmorland Ltd  
 Which?  
 Wiltshire Police

## Individuals

Richard Adam	Jose M. Ferreira
Peter Aldous	John Firth
Brian Alt	Trevor Fowler
Peter Barnes	Denis Fuller
Graham Beer	J J Garrett
Stephen Benham	Steve Gay
Julian Boardman-Weston	Clive Goddard
Edward Boucher	JG Graham
Sarah Bouchier	Patricia Hargreaves
Jean Bourne	Rachel Harold
Michael Boyd	Jon Haynes
Chris Brittain	Dave Holladay
Owen Brooker	Keith Horton
C S Brown	L V Hughes
David & Angela Butler	Steve Humphreys
David Chapple	John Hunt
Tom Chevalier	E K Indele
Caroline Connett	Paul Jones
Greg Crawford	Nicholas Keates
Lance Daintree	David Kidney MP
Tom Davies	Gareth Kreike
Nik Dennis	Tony Larvin
Ian Dobie	David Lockwood
Martin Dooley	Haydon Luke
Barbara Drysdale	Stephanie Marriott
John and Rosemary Ellis	Nigel Marter
Bob Evans	Dave McGarry

David McMillan  
Peter Meddows  
Andy Mickelthwaite  
Jonathan Miles  
J Milner  
'Mr T'  
'Murkee'  
Mark O'Sullivan  
Harry Perry  
Simon Phipps  
Howard J. Piltz  
Mick Pitt  
Helen Poxon  
Christopher J B Puttrell  
Alan Read  
Peter Ricker  
Mark Roberts  
Tim Robinson  
Les Rose  
Eduard Sefton  
L Sennet  
Malcolm Shanks  
Geoff Smith

Ian Soady  
J Stephens  
Walter Stevenson  
Chris Sundt  
'Stephen'  
Steve Sutton  
Brian Tang  
Alan Tanner  
Martin Taplin  
Chris Thompson  
Janice Timmins  
S Trammer  
Julian Tudsbury  
R Turpin  
John Tyndall  
Phil Vale  
Martin Vlietstra  
Fred Wachsberger  
P. P. Walters  
Margot Christel Wanten  
David Ward  
Julian P. G. Wathen  
Alec West