

**Consultation on Draft 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 on a proposed new Policy for Service Areas and Other Roadside Facilities on Motorways and All-Purpose Trunk Roads in England. 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.
- 1.2 The Government wishes to see the provision of roadside facilities maintained and the proposed policy aims 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 To inform the development of the policy a call for evidence was issued in November 2006. Responses from the public, interested organisations and the industry were submitted by February 2007 and were summarised and published on the Highways Agency website. Taking account of the responses to the call for evidence, a draft policy document was produced and published for consultation. The consultation ran for six weeks, beginning on 29<sup>th</sup> October 2007 and concluding on 11<sup>th</sup> December 2007.
- 1.4 In all 253 responses were received. The breakdown of 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	7	18	25
Devolved/Regional/Local Government Bodies	149	23	0	23
Trade Union and Professional Associations	25	13	2	15
Non-Government Organizations	19	9	1	10
Roadside Facility Operators	11	5	0	5
Trade Associations	2	1	0	1
Road Users' Bodies	13	0	0	0
Other Private Sector	25	0	0	0
Other Public Sector	45	6	15	21
Other	14	0	153	153
<b>TOTAL</b>	<b>399</b>	<b>64</b>	<b>189</b>	<b>253</b>

- 1.5 Many detailed responses to the consultation were received and, because of this, a descriptive summary of responses has been provided.
- 1.6 The summary follows in sequence the subheadings contained within the draft policy document, providing a flavour of the range of views.
- 1.7 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 have continued to take account of the responses themselves and have not relied on this summary alone, which cannot capture fully every point raised.
- 1.8 As stated in the consultation documents, 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).
- 1.9 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 [samantha.peckham@highways.gsi.gov.uk](mailto:samantha.peckham@highways.gsi.gov.uk) or contact

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- 1.11 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 21).

## **2 Detailed Summary of Responses By Policy Sub Heading**

### **2.1 Destination In Its Own Right**

- 2.1.1 Respondents were overwhelmingly in favour of the principle that roadside facilities should not become destinations in their own right. The definition of when a destination in its own right might be created was also greeted favourably *'paragraph 13 is the clearest definition yet of the principle and together with the proposed use of impact assessments for new and enhanced developments should ensure a greater degree of certainty for operators and investors, and for the Highways Agency itself'* (Motorway Service Area Operators Committee – an organisation which represents some but not all MSA operators)
- 2.1.2 It was argued by the operator of a lorry park that the destination in own right principle should apply to motorway service areas (MSAs) only and not to facilities off the motorway network. *'If they provide good, healthy food at reasonable prices, they will always be popular with the local community. This customer base is essential, as it will ensure the survival of the business'* (A E Rout and Sons Ltd)

### **2.2 Impact Assessment**

- 2.2.1 The introduction of the 'Impact Assessment' mechanism was well received, many respondents felt that the development of this system would lead to a well informed decision making process. *'Not only would this provide the Agency with the information that they need to make their decisions and recommendations in respect of the network, but it would also provide the site operators with the ability to provide sound evidence to the Agency about the nature of the site operations and move away from the more proscriptive actions that the Agency has found necessary in the past.'* (Freight Transport Association).
- 2.2.2 The MSA operators were also supportive of the move to introduce Impact Assessments *'We welcome the replacement of the restrictive regime set out in the 1998 MSA Policy Statement ... It seems sensible to us that innovation and new ideas be encouraged and then judged against the destination principle'* (MSA Operators Committee).
- 2.2.3 Although there were no arguments made against the Impact Assessment regime there were some important qualifications. It was stressed that they should not be *'overly costly or bureaucratic, that the time taken to complete them is sensible and proportionate'* (MSA Operators Committee).

## **2.3 Determining the Need for Motorway Service Areas**

- 2.3.1 No respondents argued against the Highways Agency being given a greater role in determining the need for MSAs. *'We would welcome the principle of the HA being involved in decisions relating to determining needs regarding existing and future service area requirements'* (Road Haulage Association).
- 2.3.2 However several respondents argued that the Highways Agency should be involved in the determination of need for all roadside facilities on its network, not just MSAs. *'There is no clear reference in the Consultation document to the determination of "need" for rest areas and the same approach as required for proving "need" for any Motorway Service Area should also apply to rest areas'* (Swayfields Ltd)

## **2.4 Access to Motorways and All-Purpose Trunk Roads**

- 2.4.1 No respondents argued against the need to limit the provision of accesses to the strategic road network and bringing the policy in line with the Department for Transport's (DfT) policy Circular 02/2007<sup>1</sup>.

## **2.5 Rear Access**

- 2.5.1 Whilst no respondents argued against the requirement that access to the local road network from some MSAs be restricted *'The council strongly supports the control of access from the Highway network to the motorway through a motorway service area by provision of physical and permanent barriers'* (Bolsover District Council), some felt that lodge guests and cyclists should be permitted users.

## **2.6 Design Standards**

- 2.6.1 The design standards laid down in the draft policy were broadly agreed with, though the Disabled Persons Transport Advisory Committee argued that the standards did not go far enough in re-asserting the requirements of Circular 01/2006 - Guidance on Changes to the Development Control System. This Circular includes a requirement for planning applications to be supported by Design and Access Statements. It should be noted that it is standard Government practice that policy requirements not be repeated in future Circulars. The requirements laid down in Circular 01/2006 are applicable to all planning applications for new roadside facilities.
- 2.6.2 Another respondent also felt that the standards should go further in coverage of environmental issues *'there is no mention within the policy review of the potential damage caused to biodiversity as a result of*

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<sup>1</sup> Department for Transport Circular 2/2007 Planning and the Strategic Road Network – published March 2007.

*roadside facility development'* (The Landscape Institute). The Highways Agency would expect that issues such as this would be adequately dealt with through the planning process

- 2.6.3 Some respondents stated that although the design standards require internal service area signs to comply with the Traffic Signs Regulations and General Directions this is not the case at some sites. *'Some existing MSAs have signing which most certainly does not comply I'm not sure what foreign drivers would make of this situation'* (a member of the public).

## **2.7 Funding of Works**

- 2.7.1 One respondent felt that public funding should be available to assist in the building of lorry parks. Another felt that the fact that the Highways Agency requires developers to enter into agreements under section 278 of the Highways Act 1980 meant that Highways Agency has more responsibility for the nature and operation of service areas than it had indicated. The Highways Agency would like to clarify that this section of the policy applies only to funding of works to enable access to sites and not to the construction of any buildings.

## **2.8 Standards of Facilities**

- 2.8.1 The introduction of an independent quality award was broadly welcomed, especially by members of the public.
- 2.8.2 The Road Haulage Association felt that there should be a separate inspection scheme and criteria for trucks. Whilst the Highways Agency would not expect to be in control of what will be included in the inspection regime for MSAs we would anticipate that it would take account of the needs of all MSA users. The Highways Agency also already produces a 'Truck Stop Guide' which aims to help lorry drivers plan their journeys, the guide provides information on the types of facility available at truck stops across England<sup>2</sup>.
- 2.8.3 One respondent questioned the lack of detail on how the scheme might operate. The Highways Agency would like to confirm that as it will not be responsible for the operation of the scheme (it will be independently managed) it is not appropriate for the policy to be too specific. The same respondent also felt that the scheme could not be voluntary as they believe that this would be in breach of the Highways Agency's responsibilities in respect of the Disability Discrimination Act 2005. The Highways Agency would point out that MSAs are essentially private sites and as such the operators are duty bound to comply with all legislation applicable to the designing and running of the development.

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2. <http://www.highways.gov.uk/knowledge/13659.aspx>

- 2.8.4 MSA operators were not convinced of the need for an independent inspection regime pointing out that they are already subject to various health and safety inspections. However they were willing to liaise with a scheme provider on the details of the quality award scheme.
- 2.8.5 MSA Operators emphasised the need for them to be part of the development of the scheme and the need for the scheme to be understood by the travelling public *'there needs to be very careful and thorough processes in place in implementing any award system to ensure it is understood and appreciated by the travelling public'* (Moto).

## **2.9 Spacing of Motorway Service Areas**

- 2.9.1 Respondents welcomed the move from a recommended spacing of MSAs of 30 miles to 28 miles/ 30 minutes drive time (whichever is lesser). *'the RHA would support the revised spacing criteria for future MSAs.... This will assist vocational drivers in meeting their legal obligation under drivers' hours' legislation'* (Road Haulage Association).
- 2.9.2 One respondent felt that a definition on spacing should be extended to facilities on the all purpose trunk road network *'at least of 15 miles... any infringement on this 15 mile spacing will have adverse implications for both road safety and congestion'* (Hertfordshire County Council).
- 2.9.3 Several respondents argued that there was a need for the policy to be clearer on its meaning of 'core sites' some also questioned the use of the phrase 'brought forward before 2007'.

## **3 Mandatory Facilities and Levels of Provision**

### **3.1 Requirements for Core Sites**

- 3.1.1 Whilst no respondents argued against the list of minimum requirements, some suggested additions to the list such as free drinking water.
- 3.1.2 Some respondents felt that there was confusion over which aspects of the requirements applied to existing as well as forthcoming sites and urged clarification.

### **3.2 Requirements for Rest Areas**

- 3.2.1 Whilst there was some disappointment expressed over the decision not to provide public funds for the development of motorway rest areas there was general appreciation of the reasons behind the decision.
- 3.2.2 One respondent suggested that signs for motorway rest areas should include a symbol indicating the availability of toilets as motorists would be unfamiliar with what facilities were available.



- 3.2.3 MSA operators stressed that they felt that a 'need case' should be proven for motorway rest areas as already exists for MSAs.
- 3.2.4 Some respondents welcomed the opportunity rest areas might give to bring 'new blood' into the roadside facilities industry. *'Rest areas, with perhaps a limited range of services could offer a way into the industry for new and innovative entrants'* (Westmorland Limited). However the same respondent went on to say that to encourage new entrants to bring forward proposals for rest areas, such facilities should be permitted to have 'header boards' on their approach sign, something which the draft policy does not allow for.

### **3.3 Picnic Areas**

- 3.3.1 The laying down of minimum criteria for picnic areas (in return for permission to use the picnic areas symbol on motorway approach signs) was broadly welcomed although some felt that the requirement for a minimum number of tables and seats was too prescriptive. *'the level of provision needed may vary by region and location'* MSA Operators Committee.
- 3.3.2 A couple of respondents requested that requirements relating to the management of litter be inserted into the policy.

### **3.4 Parking and Toilet Provision**

- 3.4.1 Several respondents felt that whilst there are obvious benefits in setting minimum levels of parking for various types of vehicle there was a need for operators to ensure that vehicles were parking in the correct areas.
- 3.4.2 One respondent suggested that operators might tailor parking provision to the route on which the facility is based. *'It is suggested that where such information exists, operators might wish to tailor the number of parking spaces for particular types of vehicle to recognise the particular demographics of the road involved'* (The Caravan Club).

### **3.5 Motorcycles**

- 3.5.1 Motorcycling organisations welcomed the requirements for motorcycle parking and helmet lockers *'The BMF welcomes the policies as set out in the Roadside Facilities Policy Review. In particular dedicated secure parking near the main rest area are particularly welcome. The provision of storage lockers for equipment would also be welcomed although these should ideally be free'* (The British Motorcyclists' Federation).

### **3.6 Caravans and motorhomes**

- 3.6.1 Members of the public and motorhome/ caravanning organisations provided a high level of input on this issue including many suggestions on how provision for these types of vehicle and their users might be improved.
- 3.6.2 Several respondents suggested that MSAs should provide over night stop over facilities for the use of caravans and motorhomes '*I would like to see not only enhanced picnic facilities but also the introduction of properly serviced motorway stopovers for motorhomes on existing sites. Each site should provide 5 minimum overnight parking bays for motorhomes with the facility for electrical hook up at a reasonable charge.*' (public respondent)
- 3.6.3 One respondent mistakenly thought that MSA operators were only encouraged to provide parking for caravans and motorhomes. The Highways Agency confirms that MSA operators are already required to provide free short term parking for all types of vehicle.
- 3.6.4 Several respondents felt that a lack of parking enforcement by MSA operators led to caravan and motorhome parking spaces regularly being filled by cars and light vans. The Highways Agency would advise that responsibility for parking enforcement within MSAs lies with MSA operators.
- 3.6.5 One respondent argued that parking facilities for vehicles towing caravans and the like should take account of the fact that drivers may have difficulty in reversing out of bays safely. '*whilst the driver of a normal vehicle will undertake a reversing manoeuvre with ease the driver of a towed outfit may well find the manoeuvring to be difficult, particularly when the driver may only operate the towed unit several times a year*' (The Caravan Club).
- 3.6.6 Another respondent also brought to our attention the need to account specifically for disabled users of caravans and motorhomes '*there is only one report of an MSA which makes provision for disabled caravan users*' (public respondent).

### **3.7 Abnormal Loads**

- 3.7.1 The Heavy Transport Association felt that the provision for abnormal loads did not specify a long enough length of bay '*Abnormal loads can be far greater in length and in the case that there may be two convoys, it would be necessary to have parking bays for abnormal loads of at least 100m in length and 6.1m width*' (Heavy Transport Association).
- 3.7.2 The Heavy Transport Association also pointed out that MSA operators will, when bound by the provisions of the policy, have to ensure that

MSA access, egress and circulatory roads are able to cope with abnormal load traffic.

### **3.8 Lorry Parking**

- 3.8.1 Several respondents argued that there is a national shortage of lorry parking and that the Government should provide lorry parking facilities.
- 3.8.2 MSA operators felt that the additional requirements in relation to provision for HGV drivers (i.e. shower and toilet facilities within the lorry parking area) were unnecessary *'We note the proposed requirements for lorry parking, which will require significant additional land take and therefore may not be desirable due to environmental concerns. Given this and cost implications we are unconvinced that extra shower and toilet facilities will be needed ... and we would be extremely concerned about security and standards at such facilities'* (MSA Operators' Committee).

### **3.9 On-line and Junction Sites**

- 3.9.1 Not all respondents agreed with the preference, outlined in the policy, for on line motorway facilities *'there are clearly occasions when a junction access may be appropriate, such as a lower use rest area, or when an on line access is not available close to the midway point between two MSAs'* (Westmorland Limited)
- 3.9.2 Other respondents were in agreement *'the RHA opposes the development of such sites They compromise road safety, transport efficiency and predictability and should be avoided in future. It also discourages people from using them. There is the added problem that off-line MSAs also attract and encourage local traffic and residents to use the sites'* (Road Haulage Association).

## **4 Signing**

### **4.1 Signing of Roadside Facilities**

- 4.1.1 In relation to the signing of MSAs the three key issues in the eyes of respondents were, the increased control of what may be displayed on headerboards, the decision not to allow stand alone brand logo signs and the removal of the symbol indicating access for disabled travellers.
- 4.1.2 Respondents were evenly split on the proposed removal of the disabled symbol from MSA approach signs. Several felt that the symbol is unnecessary in light of legislative requirements on access for disabled people whilst disability groups felt strongly that the symbol was reassuring for disabled travellers and should therefore remain on signs. *'we indicated that it was absolutely essential that disabled users can travel with confidence knowing exactly what facilities and level of assistance they can expect. The provision of the wheelchair symbol on*

*motorway signing has therefore been an important reassurance for disabled travellers in this respect. While we can see the reasoning in terms of motorway service operators being required to meet their obligations under the Disability Discrimination Act 2005 it would seem to be illogical to allow it to be replaced by the sign for a picnic area. According to the list of mandatory facilities in paragraphs 50-53, core sites are required to include a picnic site.'* (Disabled Persons Transport Advisory Committee).

- 4.1.3 The Highways Agency would like to clarify that whilst new MSAs have, since 1994, been required to provide picnic areas, the symbol indicating the availability of a picnic area can only be displayed on approach signs if the picnic area meets certain criteria i.e. it is intended to act as a bench mark of what can be expected. It may also be useful to clarify the reasons behind the proposed removal of the symbol, which are two fold. Specification of the symbol as a matter of policy implies that the MSAs are different from other locations to which the public have access, with the provision of facilities for disabled users being solely dependent on Government MSA policy. However, MSAs are subject to the full requirements of the Disability Discrimination Act (DDA). Disabled travellers should not have to rely on a symbol to achieve standards of access that are theirs by legal right. Second , the MSA operators have been able to display the wheelchair symbol 'as of right' i.e. the operators do not have to prove that their sites provide certain level of access. As the Highways Agency has no right to inspect MSAs there is no way of telling whether they are fully accessible to disabled travellers. Therefore the symbol is effectively meaningless as it implies standards of provision that may not have been met.
- 4.1.4 On the issue of brand logo signs the largest MSA operators were disappointed that the policy did not include provision for such signs *'Welcome Break is disappointed that the document appears to rule out provision of commercial brand logos. Our own experience shows that the use of high street brands such as KFC at Welcome Break MSAs has increased motorist rest breaks thereby increasing road safety levels. Such brands are instantly recognisable to drivers and are an indicator of quality in themselves.'* (Welcome Break). However one MSA operator felt that such signs were unnecessary *'If the message in the quality of the MSA brand needs burnishing, the answer is to improve the product and the service, not to avoid that responsibility by offloading it onto various franchised brands'* (Westmorland Limited)
- 4.1.5 Some MSA operators also felt that the proposal to exert greater control over the size of text on MSA approach sign 'headerboards' would have a negative impact. Adding that the addition of the 'star rating' results from the independent inspections would further reduce the space available for the display of operator names. *'Moto believe that the current signage environment is now working from a competition perspective and are very concerned that the size of the signage may*

*be reduced from the current position. Clearly if the suggestion of adding quality awards on the header plates is implemented this would be a hugely retrograde step.'* (Moto).

## **4.2 Signing within Service Areas**

- 4.2.1 Several members of the public were very critical of internal MSA traffic signs, and were supportive of the policy reinforcing the fact that such signs should comply with rules laid down in the Traffic Signs Regulations and General Directions 2002.

## **4.3 Advertising within Motorway Service Areas**

- 4.3.1 Respondents supported the proposal to prohibit advertisements situated within MSAs, which can be seen from the motorway. *'We welcome proposals to minimise or restrict advertising to reduce driver distraction'* (Cheshire County Council).

## **5.1 Information Points at MSAs**

- 5.1.1 Respondents broadly welcomed the inclusion of traffic information points within MSAs. *'The proposal to allow space for the Agency to install an information point is welcomed. Information on traffic and weather conditions would be extremely useful, while route planning or nearby accommodation/ visitor attractions might also be of use'* (The Caravan Club)

## **6 Retail Activities at MSAs and Rest Areas**

### **6.1 Retail**

- 6.1.1 Several members of the public criticised the standard of food at some service areas.
- 6.1.2 Some MSA operators were disappointed not to see an increase in the permitted retail space *'Five years ago coffee was sold in the retail area whereas now there are five different coffees choices available. As in-car entertainment systems have developed, drivers and their families expect to be able to buy not just cassettes, as they did 20 years ago, but also CDs and DVDs. All these items mean that – if the consumer is to be served well and drivers encouraged to stop – extra retail floor space is required.'* (Welcome Break). Another respondent felt that the restrictions proposed did not go far enough *'Despite reference to satisfactory impact assessments, we believe the promotion of lodges, conference and business facilities will lead to MSAs becoming a destination in their own right. Similarly and for the same reason MSA development close to junctions should not be allowed'* (Surrey County Council).

- 6.1.3 Another respondent felt that rather than restricting retail space it may be more sensible to restrict what can be sold at MSAs *'many shops in MSAs offer goods that could just as easily be purchased in shops at the origin or destination, such as clothing, toys and sports goods). The test of what may be sold should be more explicit (in effect limited to goods required on the journey) so that MSAs do not compete with the 'local retail trade' either in their own localities (para 81) or further afield.'* (Planning Inspectorate)
- 6.1.4 The Disabled Persons Transport Advisory Committee (DPTAC) reasserted the need to ensure that the requirements of disabled travellers are considered in relation to all aspects of MSAs for example by the provision of assistance on demand at fuel forecourts. *'some disabled drivers who are not able to use chip and pin payment facilities, either because of their impairment or because of the positioning of the card reader unit, have been denied access to services at filling stations. One way of resolving this would be for the Highways Agency to determine an approved procedure to obtain assistance to purchase fuel including better use of the service call system, use of hazard lights and marked disabled bays in which a driver could wait for assistance.'* (DPTAC). DPTAC also suggested that the accessibility of services at MSAs be considered as part of the independent inspection scheme.

## **6.2 Games Area**

- 6.2.1 The MSA Operators' Committee sought clarification of what was meant by 'games area' as they did not believe that it was intended to cover lorry drivers TV lounges. The Highways Agency can confirm that this is the case.

## **6.3 Tourist Information Centre**

- 6.3.1 The encouraging of operators through the policy to develop and promote Tourist Information services was universally supported by respondents.

## **6.4 Fuel Forecourt**

- 6.4.1 As discussed above DPTAC advised that operators should provide assistance at fuel pumps for disabled motorists.

## **6.5 Sale of Alcohol**

- 6.5.1 The continuation of the prohibition of the sale of alcohol was universally supported by respondents.

## **6.6 Lodges**

- 6.6.1 The MSA Operators Committee questioned the new requirement in relation to extra parking for lodges *'However we question the need to provide parking of one space per lodge bedroom because this level of parking is not necessary, given that the MSAs car parks will be empty when there is parking need from the lodge'* (MSA Operators Committee).

## **6.7 Conference Facilities and Business Centres**

- 6.7.1 Very few comments were received in relation to this issue; one MSA operator did say *'the limits on conference, lodge and gaming/leisure space should remain at the current levels'* (Welcome Break).

## **7 Coach Interchange/ Park and Ride/ Park and Share**

### **7.1 Coach Interchange**

- 7.1.1 The move to allow the use of MSAs as coach interchange sites in, in the right circumstances, was welcomed. One coach operator argued that coach interchange facilities did not necessarily mean that further coach parking should automatically be required *'Many MSA coach interchanges do not require additional infrastructure and coach operators can quite reasonably make use of the existing coach bays. We would accept that for large interchanges financial investment by the coach operator in additional features might be reasonable. However this would require long-term guarantees from the MSA operator and also lead to a claim from the coach operator for exclusivity'* (Shearings Holidays). The same respondent also stated that *'that there must be easy access from the MSA sites from both directions to account for the outward and return journeys. Allowing coaches to use the local service roads where suitable can provide this.'*
- 7.1.2 The MSA Operators Committee was supportive of the proposed policy *'The MSAOC supports the development of Coach Interchanges/ Park and Ride/ Share initiatives, as part of the Government's objective to reduce congestion, carbon emissions and the number of vehicle miles by motorists'* (MSA Operators Committee).

### **7.2 Park and Ride**

- 7.2.1 As above, the potential to use MSAs as a park and ride facility was welcomed. Although a coach industry representative felt that paragraphs 104 and 105 of the proposed policy did not correlate *'On the one hand it appears that people who make long journeys by car are to be allowed to park at the MSA in order to switch to local public transport for the last leg of their journey (paragraph 104). On the other hand, people who make short trips to the MSA to join a long distance coach are to be forced to park outside the MSA (paragraph 105).'*

(Alpha Coaches). The Highways Agency would advise that the intention of these two paragraphs is to avoid the congestion of the local road network by avoiding the need for cars to enter the conurbation and by encouraging drivers to use the local road network to meet coaches for a longer journey will avoid motorway junctions becoming congested

- 7.2.2 Another respondent questioned whether the draft policy on park and ride might conflict with policy on the management of rear accesses. *'CPRE supports the recommendation that any Park & Ride proposal must be supported by an Impact Assessment. However, we have concerns over the feasibility of the alternative form put forward of a relatively short trip by car prior to a medium to long-distance coach journey as it is difficult to see how this could be achieved as proposed without compromising the policy on rear access.'* (Campaign for the Protection of Rural England)

### **7.3 Park and Share**

- 7.3.1 Again respondents were in favour of park and share facilities at MSAs, providing that they were introduced only after full consideration of local circumstances.
- 7.3.2 Once respondent stated that *'The implementation of such services at appropriate MSAs whilst welcomed as a means of reducing congestion and greenhouse gases would be opposed by the RHA if the additional parking facility was introduced at the expense of existing LGV and abnormal load parking areas. Furthermore where there is scope for enlargement priority should be given to ensuring that adequate truck parking is available'* (Road Haulage Association). The Highways Agency would like to clarify that the reduction of parking levels for LGV drivers in order to create parking for coach interchange or park and ride/ share facilities is not permitted.

### **8.1 Truckstops**

- 8.1.1 The Freight Transport Association agreed with the proposed minimum standards that must be met before truck stops can be signed from the motorway. *'The FTA supports the proposed signage policy limitation of within 2 miles of the motorway. The minimum standards laid out in the consultation is commendable and would encourage operators to provide those facilities in return for the advantage of that facility being signposted from the motorway network.'* (Freight Transport Association).
- 8.1.2 The MSA Operators Committee felt that truckstops signed from the motorway network should provide at least the same level of parking as that required for MSAs. *'in most cases neighbouring MSAs will provide ample provision in any event. We therefore question whether motorway signage and extra LGV movements on the local road*



*network, which is likely to be unsuitable for this purpose, is appropriate'* (MSA Operators Committee)

- 8.1.3 Others felt that the criteria were too strict and should be relaxed to allow the signing of more truck stops from the motorway. *'signage to truckstops should not be limited to either those facilities within two miles of the motorway or those with the range of facilities as described in paragraph 108... It is therefore imperative that every available space is utilised and that lorry drivers are aware of the locations of these spaces. If that means signing a lorry parking facility which is more than two miles from the motorway then that is better than lorries firstly using potentially undesirable routes to reach the facility, and secondly better than even more lorries parking in inappropriate places as they were not aware of a facility which was a few miles further away from the motorway. Also, limiting signage to those facilities which provide the fuel, food and showers etc, means that again drivers not requiring these facilities may miss the opportunity to park somewhere which keeps them away from lay-bys and residential areas.'* (Dover Harbour Board)

## **9 Signed Service Areas on All-Purpose Trunk Roads**

### **9.1 Spacing**

- 9.1.1 Whilst the spacing criteria outlined in the policy were broadly welcomed there were some important qualifications identified by respondents, such as the safeguarding of protected areas. *'The need for service areas to be located at intervals of no greater than 30 minutes or 14 miles (whichever is the lesser) must be secondary to that of protecting the special qualities of this or any other protected area. The draft policy should be amended to reflect this.'* (Peak District National Park Authority)
- 9.1.2 The Road Haulage Associate felt that the spacing criteria were sufficient *'the consideration of 14miles/30minutes whichever is the lesser would appear to be an adequate consideration for service areas on the APTR network meeting the required service levels.'* (Road Haulage Association).
- 9.1.3 One respondent argued that *'The current legal framework under which services are considered is not adequate to ensure the necessary facilities are provided by the private sector or that they are in locations best suited to meet current needs. The need to provide should not rest solely with individual Planning Authorities, a regional or countrywide policy to promote and support the provision of new pres and overnight parking areas needs to be adopted by the Secretary of State for Transport. This in turn should form part of the remit of the Highways Agency supported through local authority Local Transport Plan Strategy'.* (Suffolk County Council)

- 9.1.4 The same respondent felt that signing provision for lorry parks on the all-purpose trunk road network is inadequate *‘The proposed signing in section 6... does not go far enough, in that it appears to repeat current signing regulations. Signing of lorry service areas and parks for all-purpose roads should be revised as suggested for motorway truckstops’* (Suffolk County Council)

## **9.2 Facilities**

- 9.2.1 Very few comments were received in relation to the facilities which should be provided at signed service areas on all-purpose trunk roads, DPTAC restated the need to ensure that service areas are fully accessible to disabled travellers.

## **9.3 Local Services In By-Passed Communities**

- 9.3.1 No substantial comments were received in relation to local services in by-passed communities.

## **9.4 Change of Use**

- 9.4.1 Some respondents felt that the requirements laid down in relation to change of use were overly restrictive *‘Whilst we acknowledge that it is not desirable for sites to become derelict, the appropriateness of possible future uses for such sites (in the unlikely event of closure) should be judged at the time of an application and, if not appropriate, refused.’* (Hives Planning).
- 9.4.2 Other respondents agreed with the policy provisions *‘We therefore agree with the proposal that if a site ceases to operate alternative use, other than one which services the travelling public, should be discouraged on a national basis’* (Freight Transport Association).

## **9.5 Trading from Lay-bys**

- 9.5.1 Respondents were generally appreciative of the reasoning behind the licensing scheme; however some were concerned that it may lead to a reduction in the number of refreshment facilities on the all-purpose trunk road network. *‘The Association notes the concerns of the Highways Agency on the use of lay-bys by local traders and the basic provision of lay-bys to enable motorist to stop in the course of their journey. We do, however, question the Agency’s policy of removal and elimination to reduce safety and environmental hazards caused by traders. As the consultation points out, the traders clearly serve a public need. While lay-bys are felt to be often unsuitable for such trading operations they are often the only facility available.’* (Freight Transport Association)
- 9.5.2 Other respondents were fully supportive *‘We would support a revised policy that could introduce a licensing system to be implemented in conjunction with local authorities which could help to deal with the litter and hygiene problems. We are supportive of the Local Planning*

*Authority being able to impose conditions on the grant of a licence, which would impose certain obligations on the trader in terms of activity and behaviour. A licence could then be withdrawn if problems arose. The licence fee should cover the costs of inspecting sites.'* (Unite, the Trade Union)

- 9.5.3 The formal design for a trading lay-by was welcomed *'We previously indicated our concern about the safety aspects relating to lay-bys and the protection of people using them. We believe that lay-bys should be segregated for the carriageway by a kerbed island and we are pleased to note in the draft guidance that the design layout for a trading lay-by indicates just such an arrangement. The extra width helps in accommodating the needs of disabled travellers disembarking and embarking vehicles'* (DPTAC)

## **10 Social and Environmental Responsibility**

- 10.1 This section of the policy was universally welcomed by respondents *'CPRE welcomes the Agency's statement of expectation for operators of roadside facilities on their social and environmental responsibilities.'* (Campaign to Protect Rural England)

## **11 Annex A – Signing**

- 11.1 Comments regarding signing of facilities are captured in the relevant sections above; some respondents identified errors within the Annex. All comments have been reviewed and actioned as necessary.

## **12 Annex B – Toilets and Parking**

- 12.1 One respondent felt that the time allocated as and average length of toilet use was inaccurate *'the toilet use time of 3 minutes per person, listed in appendix B, is grossly inaccurate for the current and future population. It may be accurate for young fit males; however, women take twice as long as men per visit, and older people have to visit the toilet more often, and for longer per visit than young people. Accessible toilet provision is woefully insufficient at most MSA's particularly when coaches of older people call at the site.'* (Access Association) The information used to develop the 3 minute average was provided by an MSA operator. It is also worth noting that the British Toilet Association did not comment that the average was unreasonable.

## **Future Steps**

Now that the public consultation has closed all responses will be given full consideration and the policy will be amended in light of this consideration. A final Circular will then be produced and implemented as Government policy on service areas and other roadside facilities on motorways and all purpose trunk roads in England.

## **Appendix – List of Respondents**

### **Organisations**

A Peel Company  
A.E.Rout & Sons Ltd  
Access Association  
Alfa Coaches Ltd  
Basingstoke and Deane County Council  
Birmingham City Council  
Bolsover District Council  
Breastfeeding Manifesto  
British Dietetic Association  
British Hospitality  
British Motor Cyclist Federation  
British Toilet Association  
Campaign for the Protection of Rural England  
Camping and Caravanning Club  
Cannon Consulting  
Caravan Club  
Carillion WSP  
Channel Corridor Partnership  
Cheshire County Council  
City of York Council  
Commercial Motor  
Cumbria County Council  
Devon County Council  
Disabled Persons Transport Advisory  
Committee  
Dorset County Council  
Dover Harbour Board  
Fareham and Gosport Borough  
Freight Transport Association  
Gloucestershire Gateway  
Greenwich Council  
Heavy Transport Association  
Hertfordshire County Council  
Hinkley and Bosworth Council  
Hives Planning  
Institute of Transport Administration  
Kings Lynn & West Norfolk  
Landscape Institute  
Leicestershire county council  
Lewes District Council  
Markets And Projects  
Mid Suffolk District Council

Moto  
 Motorway Service Area Operators Committee  
 National Childbirth Trust  
 National Express  
 Peak District National Park  
 Phoenixla plus  
 Pictons Solicitors  
 RAC Foundation  
 Reading County Council  
 Ribble Valley Borough Council  
 Road Haulage Association  
 RoadChef  
 Runnymede Council  
 Shearings Holidays  
 South East England  
 Suffolk County Council  
 Surrey County Council  
 Swayfields  
 TGWU  
 Torbay Council  
 Transportation Management Solutions  
 UK Metric Association  
 Unite The Union  
 Warrington Borough Council  
 WelcomeBreak  
 Westmorland Limited

## **Individuals**

Alison Bayne	Atarah Tyrrell
Alison Budden	Becky Willoughby
Alison Hales	Brian J Porteous
Alison Heasman	Carmel O'Keeffe
Alix Walker	Caroline Aird
Andrea St.Clair	Caroline Gaskin
Andy Micklethwaite	Carolyn Cordran
Angela Burns	Charlotte Norman
Anita Cartlidge	Chelsea McDonough
Ann Watts	Christine Sparks
Anna Dean	Christine Knowles
Anne Fox	Christine Mohamed
Anne McColgan	Claire Lynch
Annemarie Doran	Clare Fowell
Anthony Simmons	Clare Greer
Antoinette Cool	Clare Wilson
Antonia Mortlock	Cllr Amanda Taylor

Craig Bedson  
David Natzler  
David Reeves  
Deborah Wallace  
Denise Pemberton  
Diana Moore  
Elizabeth Ali  
Elizabeth Harris  
Elizabeth Smith  
Elsbeth Macfarlane  
Emma Cleary  
Emma Falinski  
Emma Pearce  
Emma Pemberton  
Emma Rogerson  
Emma Taylor  
Eric Cooper  
Erinn Winter  
Eve Sacker  
Fleur Sandler  
Frances Rostron  
Francesca Edwards  
Gary Thomas  
Hazel Platt  
Heather Barnes  
Heather Garrett  
Helen Palmer  
Helen Philpott  
Helen Wright  
Hilary Stuart  
Hilary Wooton  
Isabel Carrick  
J L Franks  
James Bennett  
Jane Cookdale  
Jane Kirkby  
Jane Littlehales  
Jane Main  
Janet Newman  
Jenni Marchant  
Jennie Evans  
Jennie Gavin  
Jennifer Grewal  
Jill Dye  
Jo Blach  
Joan Reid

Joanna Benner  
Joanne Sutton  
Jocasta Williams  
John and Rosemary Ellis  
John Brebner  
John Wright  
Jonathan Miles  
Julia Gibbs  
Julie Adams  
Julie Cunningham  
Julie Roberts  
Karen Payne  
Kate Malik  
Kate Ness Pomroy  
Kath Lee  
Katharine Childs  
Katharine Newman  
Kathryn Chandler  
Kathryn Driffield  
Kathryn Evans  
Kathryn Firkbank  
Kerryn Holgate  
Kirsti Wilson  
L Gerrard-Longworth  
Lauren Gordon  
Leonie Honeyman-Smith  
Linda Cook  
Lisa Baker  
Liz Fickling  
Lizanne Richards-Cole  
Lucy Best  
Lucy Foord  
M J Stephens  
Maddie McMahon  
Margaret Whittingham  
Marion Jones  
Martin Vliestra  
Martin Ward  
Matthew Pates  
Melanie Edwards  
Michaela Law  
Myfanwy Nixon  
Nicholas Sivell  
Nicola Barnes  
Nicola Heathcote-Hems  
Nicola PAscall

Nik Dennis  
Orenda O'Brien Davis  
Parmjit Dhanda MP  
Paul Watters  
Paula Booth  
Paula Simpson  
Pip Wheelwright  
R Bean  
Rachael Leiby  
Rachel Gatiss  
Rebecca Godwin  
Rebecca Sullivan  
Rebecca Williams  
Reg Pengelly  
Richard Adam  
Rob Ager  
Rob Niblett  
Roger Blythin  
Rosemary Brown  
Rosey Mitchell  
Rosie Smith  
Ruth Davies  
Ruth Heffell  
Ruth Thomas  
Ryan Morris  
Sally Marchant

Sally Mills  
Sally Wilton  
Sara Ward  
Sarah Grundy  
Sarah Hosking  
Sarah Warren  
Sharon Morris  
Sheila Kennedy  
Sheila Rush  
Shellie Dormand-Bean  
Simon Sabel  
Siobhan Carolin  
Steve (surname unknown)  
Steven Robinson  
Su Robinson  
Sue Ashfield  
Susan Richardson  
Susanne Schaefer  
Sylvie Morgan  
Theresa Evans  
Trudi Dyer  
Valerie Colquhoun  
Victoria Thomas  
Virginia Prieto  
Yvonne Cairns  
Zoe Ashton-Worsnop