

SWALE BOROUGH COUNCIL FREIGHT MANAGEMENT PLAN

Contents	Page
1. Introduction and summary	
2. Background	
2.1 Freight movement – the broad context	
2.7 Responsibilities and powers	
2.9 Other plans of authorities	
3. The problems caused by freight traffic in Swale	
3.1 The road network in Swale and Kent	
3.9 Air quality	
3.13 Noise vibration and intrusion	
3.14 Lorry parking	
3.19 Lorries on unsuitable roads	
3.21 Lorries on rural roads	
3.22 Lack of alternative options	
3.24 Impact of traffic displaced into Swale	
3.25 Lack of resilience in road network	
3.29 Damage to roads and footways	
4. Swale Borough Council's scope for action	
5. Action Plan – opportunities for direct intervention by Swale BC	
5.1 Use of Planning Powers	
5.6 Use of purchasing power	
6. Action Plan – opportunities for influencing behaviour	
6.1 Promotion of better freight operations by companies and their drivers	
6.4 Roadside information	
7. Action Plan – opportunities for working with other parties	
7.1 Provision of more overnight lorry parking in Swale (and Kent)	
7.4 M20 Lorry parking plans	
7.5 M2 junction 5 improvements	
7.6 Junction improvements on A249	
7.7 Other M2 junctions	
7.10 Lower Thames Crossing	
7.14 Better alternatives to road freight	
7.16 KCC 'Soft' initiatives	
7.17 Local traffic management and highway improvements	
7.21 Traffic Commissioners	
8. Summary of potential actions	

Appendix 1 Swale Borough Local Plan – Bearing Fruits 2031 (objectives)

Appendix 2 Extract from Swale Borough Local Plan (managing transport demand and impact)

1. Introduction and summary

1.1 This Freight Management Plan (FMP) for Swale Borough Council (SBC) has been developed as part of a programme of work undertaken by the Borough to tackle various transport, planning and environmental problems, particularly air quality. The programme started in 2013. It was part funded by the Department for Environment, Food and Rural Affairs (DEFRA), reflecting the increasing awareness of the adverse effects air pollution can have on health, for example leading to higher incidence of lung cancer and heart disease, on the environment and on the well-being of communities. Previous stages of work included traffic counts and the apportionment of pollutants; detailed assessment of the pollutants from traffic in the Air Quality Management Areas; smarter driving campaigns; successfully piloting the ECO Stars award scheme to help freight operators improve their efficiency and reduce the emissions from their fleets; and other educational campaigns in partnership with Kent County Council Highways and Transport Sections. The Borough Council recognises the significance of freight traffic's contribution to air pollution and the FMP helps address that concern.

1.2 The Plan has been prepared with the involvement of Members and Officers from both Swale BC and Kent County Council (KCC), along with Parish Councils representatives. Both KCC and SBC have roles to play in managing and mitigating the impact of freight movements in the Borough, as indeed does Highways England. It is only by working closely together, combined with support from other stakeholders, that the Plan can succeed.

1.3 Section 2 of the Plan sets out the background and context for the Plan in terms of

- where the freight movements come from and why they are as high as they are;
- the implications for air quality and other impacts in Swale;
- the legal and institutional framework of powers and responsibilities for the various organisations involved; and
- how the FMP fits with other statutory and non-statutory policies and plans.

1.4 The Plan also outlines areas for action, taking into account the powers and influence available to SBC and KCC. This is presented in sections covering

- actions which SBC has the power to take directly;
- actions where SBC potentially has the ability to influence others in beneficial ways; and
- actions where SBC will need to work with others who have the relevant powers to achieve the desired outcomes.

1.5 It is uncommon for local authorities which are not transport authorities in their own right to produce a FMP. However, authorities like SBC have a very real interest and responsibility in relation to the issue of freight movements through its statutory planning responsibilities and because of their impact on the environment and the health of their residents. It is notable that within the Borough there is a significant proportion of businesses with a major involvement in freight transport operations by both sea and road. Freight traffic was also implicated in the designation of five Air Quality Management Areas (AQMAs) in the Borough. Freight was responsible for about a third of the traffic-related pollution in these AQMAs.

1.6 The timing of this Plan coincides with KCC updating its Local Transport Plan and Freight Action Plan and is largely complementary to those plans, having similar aims to streamline the flow of goods through the Borough and reduce the environmental impact of that movement. The Plan

will also work alongside the plans to reduce air pollution that Highways England has been developing as part of its Environmental Strategy. This Freight Management Plan will provide a basis for the Borough to take what action it can to reduce the impact of freight traffic on the area and at the same time improve air quality. Each local authority is different in its circumstances and the problems it faces, many will wish to see air quality, and the environment more generally, improved through (among other things) the more effective management of freight movements.. Swale's FMP could provide an example for other Mid Kent authorities or other second tier authorities across the South East for working with county and national authorities to that end.

2. Background

Freight movement – the broad context

2.1 Almost all freight movements are the result of economic activity. The fact that Swale is suffering from air quality and traffic congestion problems associated with freight movements is due to both its location straddling important routes to ports and as a consequence of the success of the Borough in attracting businesses into the area, capitalising on its geographic location. Swale's ready access to the motorway and trunk road network and to the ports at Sheerness, Dover and the Channel Tunnel, combined with the availability of land, has encouraged the growth of distribution depots and similar operations, alongside manufacturing and other industries. All of these generate freight movements, almost entirely by road and much of it in heavy goods vehicles, adding to significant volumes of through traffic (including many goods vehicles) on roads in the Borough.

2.2 As the population of the Borough has grown, so too have the freight movements associated with servicing homes, shops and offices. Again, road transport predominates with the growth of van traffic being a particular feature of recent years, both for many service trades and in connection with internet shopping.

2.3 Lorries and vans are virtually all diesel powered and the emissions from diesel engines are one of the prime causes of nitrous oxides and particulates in air pollution. Hence, if the issue of air quality in Swale is to be tackled, managing freight movements more effectively and mitigating the effects of those movements is going to be an important part of any solution.

2.4 It must be noted, however, that freight vehicles are not the only diesel vehicles on the roads. Buses and coaches are usually diesel powered, as are many taxis and private cars too. These vehicle types are a smaller part of the vehicle mix than freight vehicles. However, private diesel cars now comprise 38% of the car fleet and make a significant contribution to certain pollutants. While not connected with freight movements, any opportunities to reduce the emissions from all these vehicle types should be worth considering, even if not part of this FMP.

2.5 Addressing the issue of diesel cars will be principally a matter for National Government, e.g. through taxation, fuel duty policies, new vehicle standards and national scrappage schemes and is not something local authorities can affect directly. Nevertheless the more general issue of car use is something that local authorities can potentially influence through the development planning process, traffic management, travel planning, using parking controls to manage demand and policies aimed at promoting the use of public transport, cycling and walking rather than cars.

2.6 Even though not part of this Freight Management Plan, such actions by local authorities (and indeed Central Government) are relevant to the broader context because the growth in car use has made congestion worse: freight traffic gets caught up in that congestion and the environmental and air quality impacts of the freight vehicles are exacerbated as a result. It follows that measures to

reduce car use by promoting alternative modes and other means will complement measures in the FMP and improve the outcomes. The wider management of traffic is given greater importance since recent research by Transport for London found that many vehicle emission control systems do not work well below 18 degrees C or at low speed, so will not be as effective for much of the year in this country's climate.

Responsibilities and powers of public bodies

2.7 Swale BC is not in a position to tackle freight management on its own. It does not, for example, operate a vehicle fleet itself, although it may be able influence contractors who operate on its behalf. It does have certain powers and responsibilities but there are bodies with other powers that would need to be deployed to create a comprehensive plan. Table 1 below summarises some of the organisations, duties and powers involved.

Table 1 Responsibilities and powers of public bodies on road and rail transport

Organisation	Responsibilities and powers
Swale Borough Council	<p>Duty to coordinate and manage air quality action plans under their Local Air Quality Management (LAQM) function.</p> <p>Responsible for developing and adopting Local Plans with development strategies and supporting land allocations.</p> <p>Granting permission for development proposals, including commercial developments.</p> <p>Parking enforcement powers under agreement with KCC.</p> <p>Licensing of taxis and minicabs.</p> <p>Contract management conditions for contractors' fleet freight vehicles.</p>
Kent County Council	<p>Highway Authority for all public roads in Kent (apart from Medway Council area), except the motorways and trunk roads. This includes the A2 in Swale where most AQMAs are situated.</p> <p>Responsible for maintaining and improving the highway, regulating traffic movement and parking, "securing the expeditious movement of traffic" under the Traffic Management Act.</p> <p>Statutory consultee in preparation of local plans and supporting transport infrastructure.</p> <p>Lead bid development for public funding for transport infrastructure.</p> <p>Advising the District Councils on development proposals that affect the highway.</p> <p>As Local Transport Authority preparing strategic transport plans and supporting bus services.</p>
Highways England	<p>Highways England (HE) is responsible for the maintenance, improvement and management of motorways and trunk roads in England. In Swale the roads involved are the M2 and the A249 between the M2 /J5 and Sheerness Port.</p>

	<p>HE is a statutory consultee in respect of district local plans.</p> <p>HE also advises the Secretary of State on planning approval for developments that may affect the strategic highways.</p> <p>HE are responsible for delivering the national route investment strategy programme where supporting economic growth is one of the key objectives.</p>
Department for Transport	<p>DfT provides national transport strategy across all modes and sets the framework for Highways England.</p> <p>In conjunction with other Government Departments it provides funding to local authorities for transport (among other) purposes.</p> <p>DfT has carried out research and provided good practice advice to the freight industry.</p> <p>It has supported projects to encourage the transfer of freight from road to rail and water,</p>
Department for Communities and Local Government	Responsible for Local Government funding and Town Planning regulations
Department for Environment, Food and Rural Affairs	Responsible for environmental policy including air quality.
National Rail	Infrastructure provider, responsible for maintenance and investment in the rail network.
Traffic Commissioners	Manages the system of licensing goods vehicle operators and the Operating Centres that they work from.

2.8 In addition to the statutory bodies in Table 1 the private sector has a large part to play in freight movements. The businesses involved and most of the vehicles are privately owned and operated, albeit within the relevant regulations, e.g. for vehicle standards currently set through the EU and construction and use regulations. Their actions have a significant effect on air quality and the cooperation of the private sector will be needed to achieve all the desired outcomes of the Plan.

Other Plans of authorities

2.9 The Swale FMP does not exist in isolation; there are other plans which it sits alongside, both within the Borough and outside. Many of the bodies listed in Table 1 have their own plans to tackle some of the problems associated with freight traffic, including air quality. As far as possible the FMP should align itself with those other plans since that will offer the greatest opportunity for achieving the aims of the Plan. These other plans include:

Swale Local Plan – Bearing Fruits 2031

The latest Local Plan was published for consultation in December 2014, subject to independent examination in 2015 and with main modifications published, again for consultation, in June 2016. The Local Plan sets out the aspirations and plans of the Council for the next 17 years. It covers the full range of topics and services for which the Council is responsible, many of which have implications for the movement of freight as illustrated in the objectives of the Local Plan set out in Appendix 1.

The Plan's overall development strategy is focused on regeneration in the western Thames Gateway part of the Borough, where there is or will be suitable supporting infrastructure. The strategy also focuses development at the main urban areas and larger rural service centres, where more services and facilities are available, so as to reduce the need to travel.

The latest draft of the Local Plan includes:

- The identification of land for industrial and commercial development which, when taken with the planning permissions already existing, represent a significant increase in employment in the Borough.
- Plans for regeneration areas at Sittingbourne and Queenborough
- Plans for working with Sheerness Port's owner and their long term strategic plan, to encourage the ongoing development of the Port and its associated services.
- Plans for 13,000 additional households across the Borough

all of which will add to freight traffic demands over time.

The Plan also identifies key transport schemes

- Sittingbourne central area regeneration transport interventions
- Construction of part of a Sittingbourne Northern Relief Road to link developments to the A249.
- Improvements to Junction 5 on the M2
- Grovehurst, Key Street and Bobbing junctions on the A249
- Roundabout at Lower Road/Barton Hill Drive on Sheppey

The Plan policies also require transport assessments to be submitted with development proposals generating a significant amount of transport movements. This will need to address impacts on the highway network; maximise opportunities for sustainable transport modes; and demonstrate impacts and any necessary mitigation on AQMAs to the satisfaction of the planning and highway authorities.

In terms of this FMP it is worth noting at this stage:

1. The future possibility of extending the Sittingbourne Northern Relief Road to the A2 have been considered and also the idea of a long term extension to the M2, although neither are part of the current Plan. If such proposals were to be explored in the future the implications of drawing additional lorries and other traffic onto the A2 and through the AQMAs would need to be taken into account.
2. Access to the strategic road network is important for freight related development. The present strategy for development of north Sittingbourne is predicated on junction improvements to access the A249 and hence the M2 via junction 5 improvements.

Swale Transportation Strategy

The Swale Transportation Strategy was produced by KCC in conjunction with Swale BC in 2014 as a consultation draft. It went far wider than just freight with four themes as in Table 2 below:

Table 2: Themes of the Swale Transportation Strategy

Theme	Aim	Transportation issues
Encouraging sustainable travel	Encourage the use of sustainable means of travel as an alternative to the private car	Walking Cycling Bus Rail
Improvements to transport infrastructure	Removal of pinch points which are barriers to development and growth.	Intelligent Transport Systems Additional road capacity and infrastructure improvements
Alternative access to services	Reduce the need to travel and supporting independence	Sustainable mixed use developments Travel plans
Road Safety	Reduce the number of people killed or seriously injured on the district's roads	Crash remedial measures Lower speeds designed into new developments Road safety campaigns

The Strategy sets out a number of potential schemes, including those listed above from the Local Plan but also adding other, more traffic management oriented schemes, for example to smooth traffic passing through Air Quality Management Areas.

It is notable as part of this FMP that the second of the themes is particularly relevant to freight movements, closely linked as they are to economic activity. However there needs to be careful consideration when adding to capacity at a particular point that a potential scheme could encourage more car commuting. That could undermine the first theme and lead to consequential congestion elsewhere, possibly adding to delays for freight vehicles and causing more pollution problems.

The Strategy is expected to be updated to reflect the final version of the Swale Local Plan and the Kent Local Transport Plan 4.

Kent County Council's Local Transport Plan 4 - Delivering Growth without Gridlock (2016-2031)

KCC's fourth Local Transport Plan (LTP4) was published for consultation in August 2016. The ambition set out in LTP4 is "To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported." All transport schemes should achieve at least one of the five outcomes below

1. Economic growth and minimised congestion:

Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.

2. Affordable and accessible door-to-door journeys:

Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.

3. Safer travel:

Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.

4. Enhanced environment:

Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.

5. Better health and wellbeing:

Promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.

Among the measures in LTP4 relevant to this Swale Freight Management Plan are:

- Support for a Lower Thames Crossing and the bifurcation of A2/M2 and M20/A20 traffic bound for the Channel Tunnel and Dover Port.
- Support for a permanent solution to Operation Stack and for a network of smaller overnight lorry parking facilities across the county
- Support for junction improvements at M2 J5 but with the developments in the Local Plan properly taken into account
- Proposal for a corridor study into the A249 to assess what is required to accommodate all the planned developments in this corridor
- Support for a study into M2 J7 and what improvements are needed there to accommodate future development.

These measures all come within Highways England's responsibilities. In relation to the first of them, it is suggested as part of this FMP that both KCC and SBC need to know much more about the detail implications of the Lower Thames Crossing and other complementary schemes in the M2/A2 corridor. It seems more than possible that the Lower Thames Crossing could first generate extra car traffic but also may result in a higher proportion of large heavy vehicles using the 2 lane M2 on the way to Dover (rather , the 3 lane M20). Investigation of potential impacts, including any impacts following traffic incidents on the M2, on the local network should be pursued.

KCC Freight Action Plan.

The KCC Freight Action Plan was published in 2012. It is currently being updated, although the main elements of the Plan are not expected to change substantially. The objectives of the 2012 Plan were:

- To take appropriate steps to tackle the problem of overnight lorry parking in Kent.
- To find a long-term solution to Operation Stack.
- To effectively manage the routing of HGV traffic to ensure that such movements remain on the Strategic Road Network for as much of their journey as possible.
- To take steps to address problems caused by freight traffic to communities.
- To ensure that KCC continues to make effective use of planning and development control powers to reduce the impact of freight traffic.
- To encourage sustainable distribution.

In addition to the highway schemes already mentioned above, the Action Plan includes a number of “soft” measures, for example providing information to lorry drivers that is better tailored to their needs, working with sat nav service providers to provide more appropriate guidance on route choice for lorries, working with freight industry, farmers and others to reduce the impact of lorries on the environment.

It is worth noting as part of this FMP that the third objective is particularly relevant to the traffic, environmental and pollution problems on the A2 with the lack of junctions between Sittingbourne and Faversham resulting in some lorry traffic having to leave the strategic road network earlier than would be ideal and use less suitable roads for local deliveries.

Highways England’s investment programme

When Highways England was formed in April 2015 the Government set out the Road Investment Strategy to 2020 for the English trunk road network. Highways England inherited route strategies for sections of the network, including one for the Kent Corridor from the M25 to the coast.

The only scheme in Swale mentioned in the Kent Corridor route strategy is the improvement of M2 J5 with a potential start date for construction of 2019 shown at the time of the strategy’s publication in 2015. Consultation on possible design options is expected early in 2017.

However the Lower Thames Crossing is also relevant to Swale as it could attract further traffic to the M2 corridor as mentioned above. The Government has been consulting on various options for the crossing.

The Government has recently published proposals for a lorry park adjacent to the M20 at Stanford near junction 11 as a solution to Operation Stack. The aim is to have the lorry park at least partially open by the summer of 2017. The plans include regular overnight parking facilities at other times, although this would not remove the need for specific overnight parking capacity in Swale.

Network Rail

There is a limited amount of freight traffic on the railways at present but Network Rail's forward plans for Kent are primarily focussed on improving passenger services. It is understood that Network Rail's draft Kent Route Study 2019-2024 will be consulted on shortly. Local authorities, Sheerness Port and other business interests may wish to input to the process and press for the greater use of the rail network for freight. However the existing passenger services are under pressure from increasing demand and the need to improve reliability.

The South Eastern franchise is coming up for renewal in 2018 which will offer the opportunity for local authorities to input to the process; however the franchise only covers passenger services.

3. The problems caused by freight traffic in Swale.**The road network in Swale and Kent**

3.1 Figures 1 and 2 show the main road and rail networks in Kent. Both the A20/M20 and the A2/M2/A2 routes are used to link the Channel Ports (including Eurotunnel) to the M25 and rest of the country. Both routes are part of the strategic route network for which Highways England is responsible. The M20 is a dual 3 lane motorway whereas east of the Gillingham junction the M2 is a dual 2 lane motorway. Accordingly, with the number of lorries using the M2, there is some congestion when lorries overtake each other.

3.2 The A249 linking the M2 from J5 to the Port of Sheerness on Sheppey is a dual 2 lane trunk road for which Highways England is also responsible. This section of the A249 is used to access the growing town of Sittingbourne and other developments. South of the M2 Kent CC are responsible for the A249; this section is a very important rural link through to the M20 used by many lorries. It has limited development, although activities on the County Show Ground do cause some problems at times. The link will become even more important as a link between the M2 and M20 when the Lower Thames Crossing is built.

3.3 The A2 through Sittingbourne and Faversham is the main alternative to the M2 for east-west movement and accesses a number of existing and proposed commercial developments including many freight origins and destinations.

3.4 The high number of goods vehicles using the roads in Swale, combined with the nature of the road network (and the absence of an effective alternative rail network), has created a number of general and specific problems in the Borough which are discussed below. Part of the backdrop to this is the growth in traffic generally over the years and freight traffic in particular. Across Kent's main roads both freight and general traffic grew steadily between 2000 and 2007. The banking crisis and subsequent economic downturn affected freight traffic (taking light and heavy goods vehicle traffic as a proxy) which declined for several years but by 2014 was above its pre-recession level. This has been driven more by light goods vehicle traffic growing more quickly than heavy good vehicles but the latter were almost back to 2007 levels in 2015. The total traffic increased between 2007 and 2015 by 4% mainly due to cars, and in total had increased by 14% between 2000 and 2015. (source: DfT traffic data)

3.5 The significance of these figures is that as traffic grows it eats into any spare capacity on the whole road network, making it less able to cope with regular demand but with even greater problems when there is anything abnormal. Congestion gets worse, occurring more frequently and lasting longer.

3.6 The main roads in Swale will have been subject to similar growth to that experienced across the county, especially with the widening of both the M2 and A2 to the west of the Borough, leading to regular congestion in Swale which is exacerbated when there is any disruption.

3.7 On the M2 and A249 typically about a quarter of the traffic is goods vehicles but on sections of the A249 this goes up to 28% or 30% reflecting the significance of freight movements for the Borough, its residents and its businesses (DfT 2015 figures).

3.8 The preceding paragraphs give a snapshot of the situation affecting freight movements on the roads as it is now but the FMP also needs to take account, as far as possible, of what will happen in the future. In that context the growth in housing and employment anticipated in the Swale Local Plan could add to the number of freight (and car) movements and could potentially make the problems discussed below worse, unless action is taken to ensure the delivery of traffic reductions and also to encourage as much traffic as possible to use the M2 and A249 and only local traffic to use the A2. The Swale Local Plan does incorporate infrastructure and traffic management measures related to new development proposed in the Plan and impacts will be assessed through transport assessments submitted with development proposals. The results of these measures should be monitored to see that the desired outcomes are being achieved.

Air Quality

3.9 There is a well-established relationship between traffic levels and air quality, including the importance of freight traffic's contribution to pollution. By way of example, in the Air Quality Management Areas at Newington and Ospringe, road traffic contributes about 85% of NO_x concentration, with heavy goods vehicles contributing 30-35% and light goods vehicles 15%, cars about 30% and buses 3-4%. Although light goods vehicles (LGVs) contribute less pollution, recent research from COMEAP identified the contribution of LGVs (about one in every 5 vehicles) which regularly travel doing local delivery to businesses along the A2 as being worse than previously thought. In some instances they are worse contributors to pollution than the newer HGVs which comply with Euro 6. The older HGVs require regular routine maintenance to ensure they do not breach MOT standards. It should be noted that all freight vehicles over 3.5 tonnes are required to have an MOT every 12 months from the date of their first registration. This annual MOT test is required regardless of age or engine type

3.10 Swale has particular problems because of the high proportion of heavy goods vehicles in the traffic mix on key routes, in particular on the A249 and the roads approaching the A249 from the nearby industrial and commercial areas. Congestion and queues make emissions from heavy goods vehicles worse. The A249 has been dualled and could be considered well suited to carrying significant heavy vehicle flows as it is not close to the main residential areas. However, the congestion that arises at all the main A249 junctions in Swale, including at J5 on the M2, does create pollution which can migrate elsewhere.

3.11 The A2 also carries significant volumes of heavy goods vehicles. The road network in Swale is such that the A2 provides the only practical E-W link to certain parts of the Borough, such as between Sittingbourne and Faversham. Goods traffic is forced to use the road to access businesses operating from these areas. The A2 is an ancient route, single carriageway and unsuitable as a through route, for heavy vehicles in particular. In settlements along the route it has houses and other buildings close to the road, creating a canyon effect. This accentuates the problem of pollution by trapping the pollutants between the houses, thus worsening the problem for residents. This problem has led to the designation of 5 separate Air Quality Management Areas along sections of the A2 where the pollution thresholds had been, or were anticipated to be, exceeded.

3.12 Vehicle emissions can seriously affect the health of those exposed to this pollution. It is linked to increased incidence of lung cancer and heart disease. Also linked to low birthweight babies where mothers in the AQMAs have smaller children with less developed lungs for life. Addressing this is a key aim of this FMP through the various actions proposed to reduce freight vehicle emissions, directly or indirectly. These health impacts also need to be taken into account in the location of new development as this will affect how many people are exposed to the emissions, for example in new housing developments.

Noise, vibration and intrusion

3.13 As well as the question of emissions, the presence of significant numbers of heavy vehicles on a route can lead to public health problems of noise and vibration for residents and others in properties close to the road, as well as mental health problems from heavy traffic at night. This is the situation on the A2 in particular and mirrors in many ways the problem of air pollution there. The canyon effect, where houses are close to the road on each side, also magnifies the noise problem. The noise and vibration felt in adjacent premises can be worsened if the lorries are travelling faster. While slowing them down could reduce the noise and vibration, there could be adverse side effects such as an increase in emissions, depending how precisely this slowing down is achieved.

Lorry parking

3.14 Many lorries operate from and return to base at the end of each day. However there are some lorries which operate over longer distances where they need to stop from time to time. Driver's hours are regulated for good safety reasons so they need to stop periodically for the driver to have a break, including overnight. There are a limited number of proper lorry parks across the whole country and where they exist it costs the driver money (which may or may not be reimbursed by their employer) to stop overnight. Also, some companies pay an allowance for refreshments and overnight stays without the need for a driver to actually incur the expenditure. These factors have led to problems of lorries parking informally overnight wherever they can find a space.

3.15 The situation in Swale is particularly acute because of its proximity to the ports at Sheerness and Dover and the other commercial activities, including freight depots, within the Borough. For example, lorries frequently park up overnight immediately after coming off a ferry (or collecting goods from a cargo ship) or immediately before joining one.

3.16 A survey carried out by KCC in June and September 2016 of known lorry parking problem areas, showed that Swale was the worst Borough in the County for lorry parking with an average of over 100 lorries parking on street overnight, but Canterbury (when the lay-bys on the A2 are included), Ashford, Tonbridge and Malling, Gravesham and Dover also have significant problems. Most of the problem spots can be traced to the proximity of the strategic (Highways England) network and near the motorways (or actually on the A2 in Canterbury and Dover). In Swale the particular problems appear close to the A249 between Sheerness and Maidstone Borough, especially near Sheerness Port, and also around Sittingbourne and along the A2 as far as Brenley Corner.

3.17 This overnight parking causes very substantial nuisance in the localities affected: noise and pollution because engines and refrigeration units are sometimes allowed to run all night; litter from food packages; urine and faeces because of the lack of toilet facilities; and damage to footways where lorries have mounted the kerb to park there.

3.18 The lorry parking issue is a regular concern for the Borough. It becomes much worse if Operation Stack comes into force when there are blockages on the cross channel routes. Highways England's plans for a large lorry area close to junction 11 on the M20 should ease the problem during Operation Stack and to some extent at other times. However, the day to day problem in Swale and along the A2 route from Dover to the M25 is likely to remain. A proposal for a site at Hernhill next to the Thanet Way was approved in October 2016 by the SBC's Planning Committee, although this is unlikely to be all that is needed by way of local lorry parks in Swale..

Lorries on unsuitable roads

3.19 As already mentioned, some freight has no choice about its route because of the location of its origin or destination and ends up using roads such as the A2 which are not well suited to significant flows of heavy vehicles (e.g. for depots on the A2 between Sittingbourne and Faversham). The fact that the M2 was one of the very early motorways to be built and was conceived when Sittingbourne and Faversham were much smaller, leading to the limited number of junctions on the motorway, makes using less suitable roads more of a problem in Swale than in some other parts of the country.

3.20 There are drivers, however, who despite having a motorway or trunk road option do not stick to roads most suited to lorries. This is often because of an incident or accident on the strategic road network but in some cases this may be people with local knowledge who are using 'rat runs' to avoid the queues caused by lack of capacity at key junctions, such as on the A249. In other cases it may be people unfamiliar with the area who are relying on fixed signs (which may not be sufficient in all instances) or on satnav systems which are not designed with larger vehicles in mind and so lead drivers onto unsuitable roads. These are not uncommon problems in other parts of the country but because of the volume of freight traffic in Swale, the effects of these problems are accentuated.

Lorries on rural roads

3.21 Lorries have always been found on rural roads in Swale servicing the farming industry that still forms an important part of the local economy. More recent trends in rural diversification, especially the conversion of farm steadings into mini business parks, has added to the numbers of vehicles involved and potentially brought the impact to more roads. While the issues on rural roads are perhaps less about pollution and noise (because the numbers are fewer than on the main roads), large vehicles on narrow rural lanes can cause obstruction, hasten damage to the carriageway and create a safety hazard for pedestrians and cyclists at a time when transport policy at national and local level is encouraging such environmentally friendly modes.

Lack of alternative options

3.22 The introduction to this Plan noted that almost all freight movements starting and ending in the Borough are by road. The Borough has good port facilities serving international routes. There is limited internal or coastal waterborne freight in the UK and where it exists it is largely focussed on a few specific markets. Although new markets might develop in the future, land transport is likely to remain the predominant means of access for goods to the Borough's ports.

3.23 Land transport does not, however, have to mean roads. There is a rail line running through the Borough to Sheerness, as well as the east-west line through Sittingbourne and Faversham which provides many commuter services. The Sheerness line carries passenger services, principally feeding the main line but also providing a very useful link between the Island and Sittingbourne. The aspiration for greater use of the line for rail freight services remains strong within the Borough and with the Port operators, especially given the ambitions for growth at the ports and in the area. There are however significant obstacles to increasing freight services, including practical limits on train paths on the existing rail network once off the Isle of Sheppey; the limitations of the UK loading gauge affecting the scope of rail freight usage; the financing model for building and operating a rail head at a time of austerity in public funding; and the economics for individual businesses considering using rail freight where less of the freight movement is point to point for bulk or heavy goods and much more is to dispersed destinations. All these factors make the provision for additional facilities or services for rail freight difficult.

Impact of traffic displaced into Swale

3.24 A range of problems have been identified above associated with the day to day operation of freight traffic on the road network, both problems for that freight traffic (as well as other traffic) such as congestion, and problems resulting from that traffic, such as air pollution and noise. Those recurrent problems are made worse every time there is disruption on the Highways England strategic road network. Disruption can be caused by urgent repairs (e.g. the sink hole which appeared on the M2 in 2014), or by accidents or maintenance closing one or more lanes of the M2 motorway (which being one of the old two lane motorways is less able to cope with lane closures than more recent three lane motorways). Even when the disruption is on the M20, e.g. for Operation Stack, the effect is felt on local roads in Swale because traffic is diverted to use the M2 rather than the M20 to Dover and that in turn leads to other traffic switching from the M2 to the A2. Whatever and wherever the cause, the effect of any disruption on the M2 and M20 is to cascade traffic onto the A2 and thence from the A2 onto more minor roads. The A2 is unsuitable in many

places at the best of times, as are the minor roads, but when displaced traffic is added the adverse impacts identified above can be magnified.

Lack of resilience in road network

3.25 A common strand in many of the preceding paragraphs has been the lack of resilience in the road network in Swale. There is only one strategic road east to west, the M2, and one north-south, the A249 connecting with the M2 at J5. The A2 provides a main road east to west but its historic origins meant that there are settlements all along the route, including passing through the middle of Sittingbourne. To the south the A249 continues to Maidstone as a dual carriageway but is a KCC road. The only other main route south is the A251 from Faversham to Ashford but this is again is an old single lane county road with many small settlements and variable geometry that does not cope well with heavy traffic. With the rapid growth of Ashford the traffic on this route like all routes linking Ashford to other settlements will have increased significantly over the last couple of decades.

3.26 There is only one junction on the motorway for Sittingbourne, unusual for a town of its size. Faversham is served by two junctions on the M2 but both are effectively east of the town. The 10 mile stretch of the M2 between junctions 5 and 6 does not allow reasonable local access to the major housing and industrial areas around parts of Sittingbourne, and between Sittingbourne and Faversham and so forces more traffic than would be desirable on to the A2 and other local roads.

3.27 The consequence of all this is that there are few alternative route options. Where the strategic network can be used, the lack of choice forces much of the traffic onto the single main motorway junction at J5. While getting traffic onto the motorway network at M2 J5 as directly as possible is consistent with good network management, the concentration of traffic there has led to the junction becoming overloaded. The improvement of this junction is funded and on Highways England's forward plan for commencement circa 2020.

3.28 The lack of options is highlighted and the problems above are compounded when there is disruption on any part of the network, but especially on the M2. Resilience has increasingly been seen as a key requirement for the wider road network. It has featured much more prominently in the recent Highways England plans. Resilience involves being able to deal with problems while causing least possible disruption and then recovering back to normal quickly. Part of this is through the better use of technology and information; part is about more active management by the road operator. Part, however, is about the inherent flexibility of the network, the ability to create options for managing situations. This last area is where the strategic network in Swale, with its limited junctions, lacks the resilience that is needed for today's conditions.

Damage to roads and footways from freight traffic

3.29 All roads suffer from wear and tear over time. The scale of impact caused by vehicles is broadly a fourth power function of the axle weight so heavy lorries cause disproportionate wear on a road surface and structure. This means, for illustration, that a 5 axle lorry with 8 tonnes on each axle will cause about 160,000 times as much wear as a smallish 1 tonne car.

3.30 Furthermore unlike the motorways and newer roads like the dualled A249, older roads such as the A2 and other more local roads were not built to take high volumes of heavy vehicles. Where such volumes of heavy traffic occur they accelerate the deterioration of the road. That in turn adds to noise and vibration and worsens conditions for other road users, especially cyclists. Unfortunately

funding for road maintenance off the strategic road network is very limited at present. Heavy traffic can also damage the utility services running under such roads. The works involved in repairing either the utility services or the road itself create disruption with consequent delays and diversions, as well as the noise, dust and nuisance for pedestrians and residents.

3.31 Heavy freight vehicles also create problems when they park on footways, as not infrequently happens, especially in town centres and residential areas. Not being designed to take the weights involved, footways end up cracked, broken and uneven often resulting in trips, especially for the elderly and infirm; also the services underneath can be damaged. Again the repairs are disruptive to all concerned and, as with carriageway repairs, it eats into the maintenance budgets of the highway authority, in this case KCC.

4. Swale BC's scope for action

4.1 As indicated in paragraph 2.7 and Table 1 above there are several different bodies that have responsibilities and powers when it comes to managing freight traffic and its impact. Swale has air quality duties and certain planning powers, for example in relation to an overall development strategy and planning applications for development, but will only be able to do a limited amount on its own in terms of highway upgrades and traffic management. It will require the support of KCC, Highways England and others, each using the powers that they have, to achieve the outcomes that the Borough wishes. Swale Borough Council will seek to influence and work with these other parties to that end.

4.2 The Borough's scope for action is not only constrained by the powers directly available to the Council. It is also constrained by its financial resources. That may be in terms of the ability of officers to devote time to follow through the actions required, given the other demands on their time which in some cases may have to be given priority because of statutory duties. Engaging with other bodies to persuade them to follow a course of action that they do not see as a priority can be time consuming. On the other hand where priorities can be aligned and other stakeholders' support can be enlisted, the work may be somewhat easier. The work that the Borough carried out with the industry to set up and pilot the ECO Stars project shows that, with commitment from all parties, success can be achieved.

4.3 In addition to the human resource availability, many of the actions proposed in the FMP will require investment of capital funds. The Borough has very limited capital funds of its own that it can use for these actions. KCC will also be constrained by the availability of funding to local authorities. The main sources of funds for transport projects are:

- From Central Government, channelled through local transport authorities such as KCC, or through Local Enterprise Partnerships, for works (including improvements and traffic management) on local roads
- From Highways England for schemes on their own roads, although in some cases they can spend money on local roads if that achieves a benefit for the strategic network
- From Government directly for specific programmes or pilot projects. (This FMP has been developed under one such programme through DEFRA)
- From the EU (for the time being) but only in specific circumstances where EU objectives are being served and there are funding programmes available

- From developer contributions through s106 of the Town and Country Planning Act, s278 of the Highways Act or Community Infrastructure Levy (CIL)

5. Action plan – opportunities for direct intervention by Swale BC

Use of planning powers

5.1 As the planning authority Swale is in a position to grant or refuse planning permission for developments that would have an effect of increasing the impact of freight traffic on congestion, air quality, noise etc. The Borough has to make its decision in the round taking account of the beneficial effect of a proposed development and has to consider the potential costs of a possible appeal by the developer. Nevertheless, it will almost always be easier to achieve any mitigation of adverse effects before they arise, i.e. at the planning stage, than to try to apply restraints retrospectively.

5.2 In its most recent modifications to the Swale Local Plan, Bearing Fruits 2031, the Borough's proposed approach to managing the impact of freight and other traffic arising from new development is set out in policy DM6: Managing Transport Demand and Impact. The text of DM6 is shown in Appendix 2 and, although the policy is far broader than just air quality it does include explicit reference to air quality issues in 2(d)..

“In assessing impacts on the highway network, development proposals will.....integrate air quality management and environmental quality into the location and design of, and access to, development and, in so doing, demonstrate that proposals do not worsen air quality to an unacceptable degree especially taking into account the cumulative impact of development schemes within or likely to impact on Air Quality Management Areas”

5.3 The Kent and Medway Air Quality Partnership (KMAQP) has produced Air Quality Planning Guidance which can be adopted and/or adapted by planning authorities in the County. This sets out a framework for assessing the air quality impacts of developments and provides a clear basis for discussion of mitigating measures with the promoters of development applications. These mitigation measures may then be incorporated into conditions attached to the planning consent. The appropriate measures will vary from one location to another but could, for example, include

- Restrictions on the hours of heavy goods vehicle operation
- Restrictions on the routes used to access the site to keep heavy vehicles on appropriate roads
- Requirements to make enhancements to local roads to accommodate traffic impacts of a new development including any requirement to cope with freight traffic
- Seek funding through Community Infrastructure Levy (CIL) or section 106 agreements to mitigate or accommodate implications of a development or series of developments

5.4 Once the Swale Local Plan is approved, the Borough's planning policy DM6 will implicitly incorporate much of KMAQP's Guidance. Swale BC will review the Air Quality Planning Guidance to see whether incorporating it into the planning decision making processes more formally would strengthen its ability to ensure that developments are compatible with the Borough's air quality objectives.

5.5 Planning conditions will only achieve the desired effect if the developers and the subsequent users of the sites comply with the conditions. Swale BC will actively monitor compliance and take action to remedy any failures identified.

Use of purchasing power

5.6 As an organisation Swale BC is a substantial purchaser of goods and services. It has an opportunity through its contracts and purchases to promote good practice in managing freight movements to minimise their impact. This could potentially include, for example,

- Specifying deliveries at times that cause least congestion or affects fewest people
- Specifying that operations on key routes avoid times when congestion would be worst affected
- Specifying that vehicles meet latest emission standards when buying or hiring vehicles for the Council's use or contracting services
- 'Requiring drivers operating under Council contracts be trained appropriately for minimising the environmental impact of their work

5.7 The Borough will explore opportunities for using its purchasing power to reduce freight related emissions.

6. Action Plan – opportunities for influencing behaviour

Promotion of better freight operations by companies and their drivers

6.1 Swale BC has developed the ECO Stars scheme, which promotes greater efficiency among fleet operators, as a pilot in Kent. The scheme gives public recognition for operators who are actively taking steps to improve efficiency, reduce fuel consumption and reduce their impact on local air quality. ECO Stars provides practical support for operators in better fuel management, driver training and supporting systems.

6.2 The Borough has also supported KCC on their “smarter travel challenge”, where there was a website for travel planning and an eco-driving initiative to help drivers to drive more efficiently, use less fuel and thus produce less air pollution.

6.3 The Borough hopes to continue actively to promote ECO Stars and other such initiatives among operators based in Swale, or who operate significantly in the area, provided funding can be obtained.

Roadside Information

6.4 Roadside signs, whether fixed or variable, can be used to provide traffic related information as well as directions and instruction for drivers. Although there are constraints on how traffic signs can be used, there may be scope for using roadside signs to persuade drivers to take actions that will benefit air quality. This could be of particular benefit in the AQMAs along the A2. Suggestions have been made for recommending drivers to turn off their engines when in a queue. This has

been tried elsewhere, although the focus has been more on parked vehicles rather than vehicles in queues. There are issues relating to engine and vehicle types about whether this would in all circumstances result in a reduction in emissions because the process of restarting an engine can generate a disproportionate amount of pollution, offsetting any benefit of a short switch off. Other suggestions include reducing speed in residential areas to reduce accidents although this might not have much effect on emissions. Careful consideration is therefore needed to determine what messages would best help reduce pollution but the Borough is interested in looking in more detail at what would be effective.

6.5 The erection of signs and their associated messages would require the consent of KCC as the highway and traffic authority for the non-trunk roads. Variable message signs could be multi-functional as they would be able to provide a range of messages, not just about air quality, but questions of number and location of any signs would need looking at carefully to see if the costs would be justified. The Borough will seek discussion with KCC about the potential for using roadside information to reduce emissions from lorries and vans.

7. Action Plan – opportunities for working with other parties

Provision of more overnight lorry parking in Swale (and Kent)

7.1 Kent County Council is actively studying the possibilities of provision of more lorry parking combined with night time parking bans. It may be appropriate, bearing in mind the scale of the problem in many boroughs in Kent, that a County wide traffic order should be implemented. Large area wide restrictions can be difficult to implement; for example, they would need to be signed on all roads entering the County. It would be preferable if regulations could be amended to make their introduction easier but, in any event, there would need to be sufficient additional, convenient lorry parks introduced before a ban could be implemented. The Strategic Lorry park at junction 11 on the M20 could meet a significant part of this demand – it is understood that current proposals include 500 overnight parking spaces to be used when there is no cross-Channel disruption. The M2 Services between junctions 4 and 5 could meet some of the demand in Swale but it is probable that additional lorry parks, such as the one recently approved at Hernhill on Thanet Way, would still be required reasonably accessible to the A2 and A249 routes.

7.2 Initial work by KCC shows that such lorry parks could be commercially viable, especially if there is adequate enforcement of any night-time lorry parking ban. Further work probably also needs to be undertaken on enforcement processes to ensure the enforcement costs are in balance with any revenues received from Penalty Charge Notices. Effective means of ensuring collection of revenues from all lorries including foreign registered vehicles is equally important. Joint working on penalties that may be levied at Dartford Crossing could be part of making enforcement effective. It is understood that there is significant non-payment of Dart charges and as a night-time lorry ban is likely to affect foreign registered vehicles, joint working on this issue could be very helpful and important for the success in solving the problems associated with overnight lorry parking.

7.3 SBC can use its planning and enforcement powers and work with KCC and other Kent boroughs to seek to bring an effective night-time lorry parking ban possibly for the whole of Kent to fruition

M20 lorry parking plans

7.4 The Borough supports Highways England's plans for a major lorry area adjacent to the M20 to address the problems caused by Operation Stack, because of the knock on effects Operation Stack has in Swale when it is in place. The Borough will continue to make its views known to Highways England, as necessary, as their plans are being taken through to implementation. It is important to Swale that at least part of the proposed lorry park can be regularly used for overnight parking of goods vehicles.

M2 Junction 5 improvements

7.5 The Borough recognises the need to improve Junction 5 on the M2 in order to reduce the congestion on the A249 approaches where there are above-average proportions of goods vehicles in the traffic mix. However the Borough wishes to be reassured that the designs proposed will accommodate the additional traffic generated by the development proposed in the Swale Local Plan and similarly developments proposed by Maidstone Borough Council. The Borough is already engaging alongside KCC with Highways England in developing designs for the junction to ensure that any scheme will cope with traffic bound for redevelopment areas north of Sittingbourne, which will be routed largely by the A249, and that the scheme will have a beneficial effect for the longer term.

Junction improvements on A249

7.6 The Borough has been pressing for improvements to the A249 junctions because of the congestion that currently exists on the approaches to the junctions at Grovehurst, Key Street and Bobbing. Freight traffic gets caught up in this congestion (and indeed partly contributes to it). The Borough is actively pursuing this with KCC, Highways England and key development promoters in the A249 corridor to ensure that the levels of development proposed through the current local plan can be accommodated or mitigated, if necessary through appropriate highway improvements in the short and longer term.

Other M2 junctions

7.7 Swale BC supports KCC's proposal for a study to look at what improvements are needed at junction 7 of the M2 to cater for potential future developments in Swale and further east, and will cooperate in any such study. There is significant and growing congestion at junction 7. While the signalisation scheme has helped, there may be scope for short term measures by remarking lanes. However this junction will probably need improving further, especially with any extra traffic from the proposed Lower Thames Crossing.

7.8 One of the features underlying many of the problems identified in section 3 above is the lack of resilience in the main road network in Swale. One means of improving resilience would be to add one or two junctions to the M2 between junctions 5 and 6 linking to the A2. This would relieve some of the pressure on junction 5 by providing an alternative access to Sittingbourne from the east and Faversham from the west. It would significantly improve access to the Kent Science Park. Furthermore, it would work very effectively with the Sittingbourne Northern Relief Road if that were linked to the A2. It would reduce the problem of drawing more traffic to the A2 through AQMAs. Similarly a link from the M2 to the A2 at the western end of Faversham linking to the Western Link

(to Oare) would have significant benefits to Ospringe AQMA and relieve the A2 through Faversham without adding to commuting traffic on the M2

7.9 Such proposals are not part of Highways England's forward plans, nor are they part of KCC or Swale's plans. Previous studies looking at an extra junction on the M2 concluded that it would not be economically justified under the appraisal methods then used and. Nevertheless, looking further ahead the concept of extra junctions could have potential benefits for the Borough. It is notable that most transport policies do suggest that the routing of HGV traffic should ensure that such movements remain on the strategic road network for as much of its journey as possible, furthermore as mentioned before towns, certainly the size of Sittingbourne, would normally now be planned with more accesses to the M2. Conditions are changing; resilience on the road network is seen as more important; appraisal methods are changing, giving greater weight to economic development benefits; development in the longer term may follow a different path; which means that conclusions could be different in the future. The Borough would therefore be open to and support any future investigation of the feasibility and viability of such junctions with Highways England and KCC.

Lower Thames Crossing

7.10 The Dartford Crossing frequently has substantial queuing traffic even after the introduction of the free flow tolling system. The congestion this close to London is undoubtedly caused by excessive road space each side of the crossing (without complementary car traffic reduction or sustainable transport strategies) encouraging extra long distance car commuting, combined with substantial long distance lorry traffic.

7.11 There is very substantial evidence that increases in road capacity or speed on main roads in densely populated areas generate significant volumes of extra traffic, particularly in peak periods. New estuarial or river crossings or expansions of existing crossings exhibit this to the greatest extent. It is anticipated that this could be the case with a Lower Thames Crossing. (The most ready reference to this phenomenon can be found on <http://worldtransportjournal.com/wp-content/uploads/2016/02/9th-Feb-final-opt.pdf> please see page 37 onwards and particularly the references quoted in that paper.)

7.12 Also, there is a specific problem at the Dartford Crossing for large lorries going north. Both tunnels and particularly the western tunnel have limited height for large lorries. Furthermore there are additional problems with hazardous loads which tend to restrict the capacity northbound. A Lower Thames Crossing could allow the larger lorries to avoid Dartford Crossing but additional capacity would generate more traffic resulting in congestion elsewhere - some would probably appear on the M2 through Swale. It is also possible that more lorries would use the M2 through Swale rather than the M20 unless other measures are implemented to ensure that the extra traffic uses appropriate link roads and the M20. Bearing in mind the fact that the M2 is a two lane motorway and often close to its maximum link capacity, overtaking lorries already cause significant congestion; with a greater proportion of lorries possibly using the Lower Thames Crossing and the A2/M2 Route to Dover rather than the M20, this congestion is likely to be worsened.

7.13 It is important that, with any support that SBC may give to a Lower Thames Crossing, Highways England introduce measures to avoid extra congestion on the M2 and consequential spill over on to the A2.

Better alternatives to road freight

7.14 The carriage of freight by sea or by rail would have less environmental impact than transporting it by road. The scope for more internal waterborne freight traffic passing through Swale's ports will be driven by the market opportunities and the commercial case for such services. Currently opportunities are limited but if circumstances change the local authority can be supportive, for example through the planning process where relevant, but the key decisions will be by the private sector.

7.15 On the rail network, as indicated in paragraph 3.19, there are severe limitations on making significant changes to increase rail freight. The lack of spare capacity on the rail network off the Isle of Sheppey means that extra freight services are in competition with passenger services, which are themselves under pressure. There are also very limited routes with the loading gauge needed for full rail freight services. Overcoming these limitations would take substantial investment and there remains the essential question of whether goods distributors view such services as economic. Nevertheless Swale BC and other authorities support the principle of moving traffic onto rail wherever possible. If any opportunities arise to develop rail freight, including any depots for transfer direct from sea to rail or from road to rail, the Council will work with all stakeholders (including freight businesses, Peel Ports, National Rail, KCC and Central Government) to deliver such facilities

KCC soft initiatives,

7.16 The Borough welcomed the proposals in KCC's 2012 Freight Action Plan for non-infrastructure actions such as organising town centre deliveries to take place when least disruptive (this is presently not in the new draft KCC 2016 Freight Action Plan), creating a freight route planner, working with service providers to develop HGV sat navs, the Lorry Watch Scheme improved signing provision for HGVs and working with industry on education and good practice. Although the Borough does not have technical expertise in some of these areas it does have a range of contacts and communication networks through which it can assist KCC in taking these forward, for example through Town Centre Managers and local business networks. Its work with ECO Stars has demonstrated the Borough's commitment to these kinds of initiatives and it will continue to support similar activities, as far as it is able, in the future.

Local traffic management and highway improvements

7.17 A number of possible improvements to the strategic road network have been discussed above. These are all funded by Central Government directly and progressed by Highways England under the Road Investment Strategy. Local government is consulted on the programme and possible candidates for the Strategy. It is by no means certain that they will all go ahead and even if they do it will be some years before they are completed. Even with these improvements there will still be local problems of congestion and air quality both resulting from and affecting freight traffic. There are already issues on sections of the A2 fronted by houses and on the A251, as well as on other local roads.

7.18 There is no panacea to resolve these issues but there may well be scope for local measures such as:

- Traffic management measures, e.g. access or movement restrictions at certain times of day, parking controls, speed restrictions

- better information systems through more variable message signs
- clean air zones
- small scale highway improvements
- encouraging alternative modes to car use to reduce congestion and hence pollution from freight and other traffic.

7.19 It may be noted that the current form of clean air zones being promoted by Government focusses on large cities and involves charging and would not be appropriate for towns in Swale. However, given the wide interest in reducing air pollution from road traffic, other models for clean air zones better suited to towns, or to smaller areas within towns, may well be developed and could be explored as future options in the Borough.

7.20 Care is needed in assessing what effects these measures will have; the effects may be subject to the 'law of unintended consequences'. For example, a speed limit may reduce the noise produced by heavy lorries but might increase the emissions. Also, the needs of all road users must be taken into account; solving a problem for freight movements should not be at the expense of pedestrians, for example. Nevertheless the Borough is keen that small scale options for improving conditions are not ignored and will bring these to the attention of KCC as the highway and traffic authority. The Borough will work with the County to investigate options, find funding and implement solutions.

Traffic Commissioners

7.21 The Borough has had concerns that the local knowledge of the area does not weigh enough in the issuing of operating licences. The Government recently reviewed the operation of the Traffic Commissioners and decided not to make significant changes to the present system. The process of consultation by the Commissioners will continue to be the means by which local authorities will have any influence on applications by potential operators. The Borough will work with KCC to ensure that appropriate representations are made on applications for operator licences.

8 Summary of potential actions

1. Swale BC will review the Kent and Medway Air Quality Partnership Air Quality Planning Guidance to see whether to incorporate it formally into their planning decision making processes, after a suitable Local Plan parent policy has been adopted.
2. Swale BC will actively monitor compliance with air quality planning conditions and take action to remedy any failures identified.
3. The Borough will explore opportunities for using its purchasing power to reduce freight related emissions.
4. The Borough will seek discussion with KCC about the potential for using roadside information to reduce emissions from lorries and vans.
5. The Borough will actively support KCC and work with other Kent Boroughs in the work necessary to deliver night-time lorry parking bans and improved facilities for overnight lorry parking.
6. The Borough will continue to make its views known to Highways England, as necessary, as their plans for a lorry park near junction 11 of the M20 are implemented
7. The Borough will engage with Highways England and KCC in developing designs for junction 5 on the M2 to ensure that any scheme will have a beneficial effects for the longer term.
8. The Borough will continue to actively engage with the highway authorities and developers to achieve suitable mitigation schemes for the A249 corridor junctions with the non-trunk road network to support committed and planned development..
9. Swale BC would support a route study of the M2 in Swale by Highways England which includes looking at what improvements are needed at junction 7 of the M2 to cater for potential future developments in Swale and in districts further east, The Borough will cooperate in any such study.
10. While the Borough supports the principle of the HE scheme for a Lower Thames Crossing, it will need to be reassured that any possible adverse consequences of more traffic, and particularly lorry traffic, on the M2 will not add to congestion or resilience problems of the M2 resulting in potential diversions on to the A2.
11. The Borough will actively look for and support any initiatives to encourage more freight to be carried by sea or rail.
12. The Borough will work with KCC on non-infrastructure initiatives for reducing the impact of freight traffic.
13. The Borough will work with the County to investigate local traffic management options for addressing air quality problems.
14. The Borough will work with KCC to ensure that local views are made clear to the Traffic Commissioners when consultations take place on goods vehicle operator licences.

Appendix 1**Extract from Swale Borough Local Plan – Bearing Fruits 2031****Objectives**

Our core objectives:

1. Adapt to climate change with innovation, reduced use of resources, managed risk to our communities and opportunities for biodiversity to thrive.
2. Use our coastal assets to support a strong economy and a sustainably managed environment.
3. Support economic success and improve community wellbeing with a network of maintained, protected and improved natural assets in town and country.
4. Conserve and enhance our historic and natural assets as the means to drive regeneration, tourism, and environmental quality and to reverse declines in their condition.
5. Strive for high quality design to bring a better quality of life, opportunities for healthy living and self-confidence to our communities.
6. Be flexible, provide choice and support sectors that can build on our strengths, diversify our economy, promote investment in skills, and develop our distinct opportunities in pursuit of greener and pioneering technologies.
7. Bring economic growth, regeneration and community development, especially to our most deprived communities.
8. Support our farming and food sectors so that they are at the forefront of increasing food security, reducing food miles and increasing local food consumption.
9. Provide the right housing to support demographic change and housing needs to regenerate and build stronger, greener communities.
10. Develop tourism and culture to support regeneration, employment growth, communities and environmental management.
11. Improve prosperity and environmental quality with efficient and sustainable transport networks.
12. Ensure timely delivery of the services and infrastructure to support strong communities.

Our place based objectives:

1. Re-establish Sittingbourne as the principal town with investment in retail, leisure, culture and community services and further education, within new and improved green spaces and streets.
2. Reinforce Sheppey's uniqueness by ensuring change: supports Sheerness as its commercial and service focus; strengthens and integrates communities at Rushenden and Queenborough and Minster and Halfway; manages coastal and heritage assets; modernises leisure and tourism industries; and supports isolated communities.
3. Sustain Faversham's role and character as an historic market town serving residents, visitors and a wider area with a range of businesses and services that increase diversity and interest.
4. Address identified needs in our rural communities so that they are sustained in ways that also respect their scale and character.

Appendix 2**Extract from Swale Local Plan - Bearing Fruits 2031****Policy DM 6 - Managing transport demand and impact**

1. Development proposals generating a significant amount of transport movements will be required to support their proposal with the preparation of a Transport Assessment (including a Travel Plan), which will be based on the Council's most recent strategic modelling work. The Highways Agency may also require a Transport Assessment if development is deemed to impact on the strategic road network.
2. In assessing impacts on the highway network, development proposals will:
 - a. demonstrate that opportunities for sustainable transport modes have been taken up;
 - b. where the residual cumulative impact of development on traffic generation would be in excess of the capacity of the highway network and/or lead to a decrease in safety, environmentally acceptable improvements to the network agreed by the Borough Council and the Highway Authority will be expected. Such works will be carried out by the developer or a contribution made towards them in accordance with Policy CP56. If such works cannot be carried out and the residual cumulative impacts of development are severe, then the development will be refused.
 - c. avoid the formation of a new direct access onto the strategic or primary distributor route network where possible, or unless where identified by the Local Plan. Other proposals for new access onto the networks will need to demonstrate that they can be created in a location acceptable to the Borough Council and appropriate Highway Authority. Proposals involving intensification of any existing access onto a strategic, primary or other route will need to demonstrate that it is of a suitable capacity and safety standard or can be improved to achieve such a standard;
 - d. integrate air quality management and environmental quality into the location and design of, and access to, development and, in so doing, demonstrate that proposals do not worsen air quality to an unacceptable degree especially taking into account the cumulative impact of development schemes within or likely to impact on Air Quality Management Areas; and
 - e. not result in the loss of usable wharfage or rail facilities.
3. The location, design and layout of development proposals will demonstrate that:
 - a. priority is given to the needs of pedestrians and cyclists, including the disabled, through the provision of safe routes which minimise cyclist/pedestrian and traffic conflict within the site and which connect to local services and facilities;
 - b. existing public rights of way are retained, or exceptionally diverted, and new routes created in appropriate locations;
 - c. access to public transport is integrated into site design and layout where appropriate;
 - d. the safe and efficient delivery of goods and supplies and access for emergency and utility vehicles can be accommodated; and
 - e. it includes facilities for charging plug-in and other ultra low emission vehicles on major developments.