

SWALE JOINT TRANSPORTATION BOARD	
Meeting Date	Monday 6 th March 2017
Report Title	Response to the Freight Action Plan for Kent Consultation
Cabinet Member	Cllr Andrew Bowles and Cllr David Simmons
SMT Lead	Emma Wiggins and Dave Thomas
Head of Service	Charlotte Hudson
Lead Officer	Kieren Mansfield (SBC)
Classification	Open
Recommendations	1. Members are asked to consider the attached response to the Freight Action Plan for Kent and recommend any amendments to the letter.

1 Purpose of Report and Executive Summary

- 1.1 The report provides an opportunity for the Swale Joint Transportation Board (JTB) to comment and endorse the Swale Borough Council response to the proposed [Freight Action Plan for Kent](#).

2 Background

- 2.1 Kent County Council (KCC) has developed a Freight Action Plan to recognise what has already been achieved, the roles and responsibilities of the major stakeholders of freight traffic and actions which seek to mitigate the negative impact of road freight traffic to the county. The consultation began on 16th January 2017 and will conclude on 12 March 2017.
- 2.2 The five key actions of the plan are:
1. To tackle the problem of overnight lorry parking in Kent;
 2. To find a long term solution to Operation Stack;
 3. To effectively manage the routeing of HGV traffic to ensure that such movements remain on the strategic road network for as much of its journey as possible;
 4. To take steps to address the problems caused by freight traffic to communities;
 5. To ensure that KCC continues to make effective use of planning and development control powers to reduce the impact of freight traffic.
- 2.3 Swale Borough Council (SBC) has prepared the attached letter at appendix I as a response to the content of the proposed [Freight Action Plan](#).

3 Consultation Undertaken or Proposed

- 3.1 Officers consulted with Environmental Health, Environmental Response, Planning Policy, Economic Development and Cleansing Teams to prepare the response. The two MPs within the Swale area, Gordon Henderson MP and Helen Whately MP were also consulted for their views on the draft plan.

4 Implications

Issue	Implications
Corporate Plan	The response contributes to 'A Borough to be proud of', by contributing to a reduction in air pollution, helping to keep Swale clean and tidy, and lobbying for better roads and transport.
Financial, Resource and Property	None identified at this stage.
Legal and Statutory	None identified at this stage.
Crime and Disorder	The main issue for the Environmental Response and Cleansing Teams continues to be the litter associated with lorry parking in the Borough. The teams receive a large number of complaints on this issue and can only take limited action unless they catch the individual in the process of littering (which is unlikely). The issue has been highlighted in the Council's response to ensure the Freight Action Plan assists, where possible, to address this issue.
Sustainability	The draft plan proposes the continued routing of HGV traffic to remain on the strategic road network which has direct implications for Swale where a high proportion of heavy goods vehicles use local roads. In particular the A2 suffers from a canyon effect with houses on both sides, which accentuates the problem of air pollution and has led to the designation of 5 separate Air Quality Management Areas on the route. The Council's response seeks to encourage continued action to decrease freight traffic on these roads.
Health and Wellbeing	As discussed under the sustainability section, the response supports the managed routing of HGV traffic onto the strategic road network so as to decrease air pollution on other routes and thereby contribute to an improvement in health outcomes for Swale residents.
Risk Management and Health and Safety	None identified at this stage.
Equality and	KCC has prepared an Equality Impact Assessment for the draft

5 Appendices

5.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Draft response to Kent County Council's proposed Freight Action Plan for Kent.

6 Background Papers

6.1 [Freight Action Plan for Kent: Consultation Draft](#)

Appendix I: Draft Response to Kent County Council's proposed Freight Action Plan for Kent.

Transport Strategy Team
Planning and Environment Division
Kent County Council
Invicta House
County Hall
Maidstone
Kent ME14 1XX

X March 2017

Dear Sir or Madam,

Thank you for your recent invitation to respond to the consultation about the proposed Freight Action Plan for Kent. I am responding on behalf of Swale Borough Council, and as Chairman of the Swale Joint Transportation Board, to ensure that the views of Borough's residents are recognised in the adopted plan. Our comments are as follows:

Tackling the problem of overnight lorry parking

As the figures in the strategy indicate, this is a significant issue for Swale and in evidence at locations across the Borough. The Council receives a large number of complaints regarding this, and we are limited in the action that we can take unless we catch someone in the process of littering (which is unlikely). We have erected signs in many languages, spoken to drivers at weekends, and provided many more bins in these locations to help tackle the problem, all with limited success. A County-wide approach needs to be developed, focused around deterrents that are not reliant on the use of FPN's, with the likelihood that payment rates from foreign based drivers will be low.

Swale Borough Council would be keen to engage in the discussion around provision of lorry parking, but are mindful that such discussion should also involve what limited commercial provision already exists to provide a complete picture.

Operation Stack

In recognising the importance of finding the long-term solution to operation stack, we would wish to emphasise the need to ensure that investment is made along the A2/M2 corridor so that it is capable of playing its role in the facilitating the movement of HGV traffic across the County. This will be of increased importance, assuming the delivery of the Lower Thames Crossing on the basis of the preferred option C. Key junctions requiring investment on the M2 will be junction 5 and junction 7, the former, facilitating effective vehicle movements between the two major transport corridors via the A249, and the latter as a significant pinch point on the route to Dover, which mixes local traffic with that coming through the strategic highway network.

Managing the routing of HGV traffic to remain on the strategic road network and addressing problems caused by freight traffic to communities.

With its growing economy and strong distribution sector, Swale has particular problems because of the high proportion of heavy goods vehicles in the traffic mix on key routes, away from the strategic road network. The A2 is of particular concern, and carries significant volumes of heavy goods vehicles. The road network in Swale is such that the A2 provides the only reasonable 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.

Aside from local traffic generation, the limited number of access points between the A2 and the M2 contributes to the issue and as such future consideration of an appropriately located new A2-M2 link, with appropriate linkages into the wider road network serving the major commercial sites, would contribute to addressing the significant traffic and associated issues.

The plan also makes no reference to encouraging modal shift for goods traffic. An example is the opportunity to create an international rail hub, linked to the Port of Sheerness, using the branch Line to get more freight on rail and off the local and strategic road networks. This measure would help to ease the freight pressure on local roads, and encourage further economic development on the Isle of Sheppey. We also ask that the plan makes reference to ensuring that access to the port is improved in light of planned growth.

Yours faithfully,

Cllr Andrew Bowles
Council Leader and the Chairman of the Swale Joint Transportation Board