

FREIGHT ACTION PLAN FOR KENT

ONLINE PUBLIC CONSULTATION RESPONSES

This report sets out the responses to the online public consultation for the Freight Action Plan for Kent and consequent amendments to the Plan. The consultation period was open from 28th May 2012 until 23rd July 2012.

1. Introduction

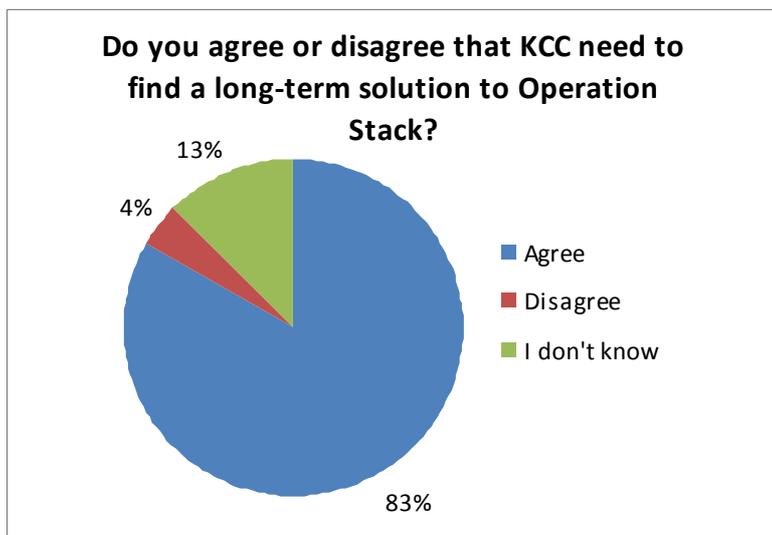
The public consultation was available online from Monday 28th May to Monday 23rd July 2012. 25 responses were received online and a further 25 written representations were sent to officers. On closer inspection, one of the online submissions had also made a written representation so the analysis below discounts their online submission as it refers to their written statement.

Although percentages are used below please note the small sample size.

2. Online consultation responses

The online consultation was structured to ask respondents if they agreed or disagreed with each of the FAP objectives. If they disagreed respondents were asked to explain why. All respondents had the opportunity to write any further comments about each objective and finally about the FAP in general.

Objective 1



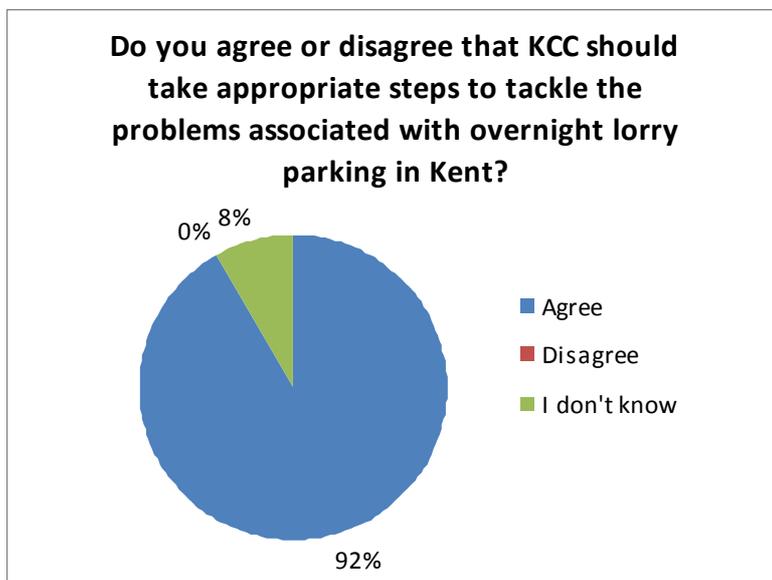
One person disagreed with objective 1 and commented that “this should be undertaken by central government in conjunction with KCC.” Three suggestions were made:

- On entering the UK mobile phone numbers should be registered so that an auto dialler can ring them to tell them not to travel to the ports.
- A lorry park should be built between Dover and the M26 or Dover and the M2.
- Samphire Hoe should be used as a lorry park.

Three other people expressed that the need for action is urgent, although conversely two said that the reduction in frequency of Operation Stack means it is no longer such a priority. Like the responded who disagreed with the objective, another commented that the solution would benefit the wider South East region and so should not be left to Kent alone. Another stated that if the docks helped one another there would be no disruption.

Finding a long-term solution to Operation Stack is a priority for KCC and it is considered that a lorry park is the only feasible solution. Work on finding a suitable location is underway and then the necessary steps will be taken to achieve planning permission.

Objective 2



The main group of comments received in response to this objective was to emphasise the need for new parking facilities, including:

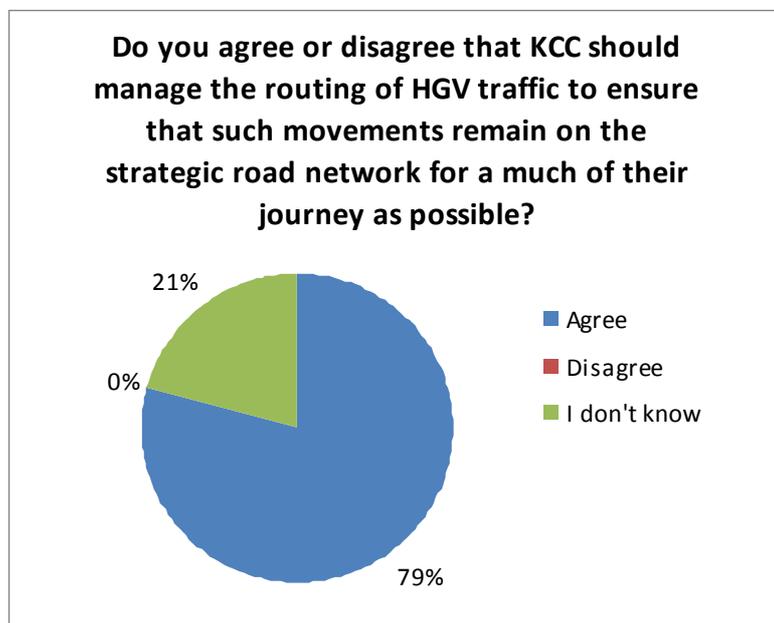
- “we need more FREE parking in and around kent”
- “not enough lorry parks”
- “the A20 from Folkestone to Dover is a disgrace...its an 8 mile stretch...and not one toilet”

One respondent commented on the negative affect of lorry parking – that lay-bys aren't available for short breaks for fatigued drivers, and another emphasised the need to take steps now. As for objective 1, a respondent said this is not for KCC alone to solve.

In terms of the objective itself, a comment was received that “the word appropriate needs to be defined.”

Finding new parking facilities is an action in the Plan; however, it cannot be the only means of tackling the problems caused by overnight lorry parking. “Appropriate steps” refers to this and the need to act but not just move the problems somewhere else. Equally, the objective would stand without the word “appropriate” but the decision has been made to keep it to show that KCC will take reasonable action.

Objective 3



21% of respondents answered “I don't know” in response to this question on objective 3, representing 5 responses in total. Support and suggestions for this objective included:

- “HGVs on minor roads and in towns constitute a major hazard to pedestrians and cyclists, and make a major contribution to noise and atmospheric pollution.”
- “There should be no HGV traffic on B roads or smaller unless access needed.”
- “Restrictions for HGV to remain in slow lane on two lane/dual carriage way.”
- “KCC need to be aware that drivers may have no understanding of our county system in the UK for them to access information.”
- “the french have restrictions so should we the problem is enforcing them *[sic]*.”

Despite no respondents disagreeing with the objective there were a number of negative comments, including:

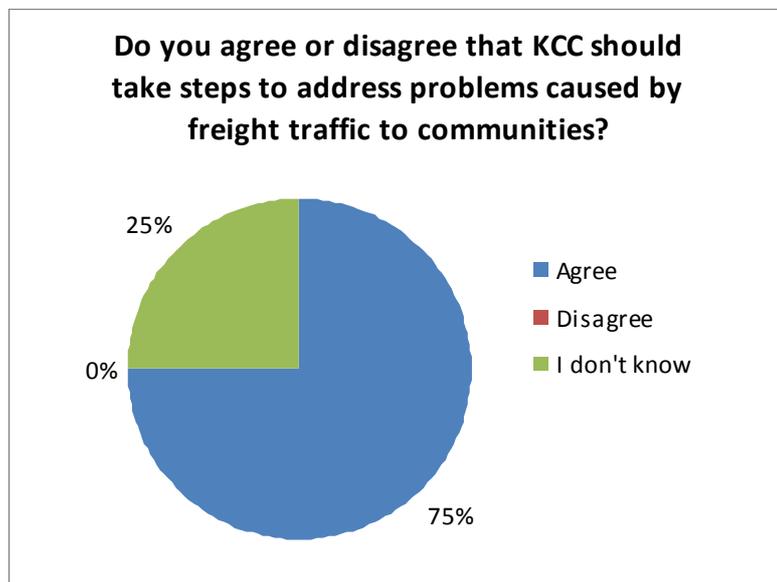
- HGVs should be able to use any road as they pay their taxes.
- Bifurcation will only work if traffic density on the A2/M2 will allow and “we understand that this is currently not the case.”
- HGVs stick to the Strategic Road Network (SRN) as much as they can now. Forbidding access off it might well strangle the SRN anyway.”

Again, the need to “get on with it” was expressed.

Lane restrictions are outside the scope of the FAP because this would be central government legislation. The actions under this objective, including the online freight journey planner, may sometimes be hosted on our website but they will be advertised externally by liaising with partner organisations such as Kent Police and the Ports.

The FAP does not propose to forbid HGVs from using roads other than the SRN but to encourage it to stick to it rather than using inappropriate and sometimes restricted routes (such as B class roads) as shortcuts, for example. It is unreasonable to allow HGVs to use any road because some are plainly unsuitable and use of others may adversely impact on communities living there. Like the Operation Stack Lorry Park, bifurcation would be subject to further assessment. It is not an action in the FAP but has been referred to because it is a priority set out in Growth without Gridlock.

Objective 4



Support and suggestions included:

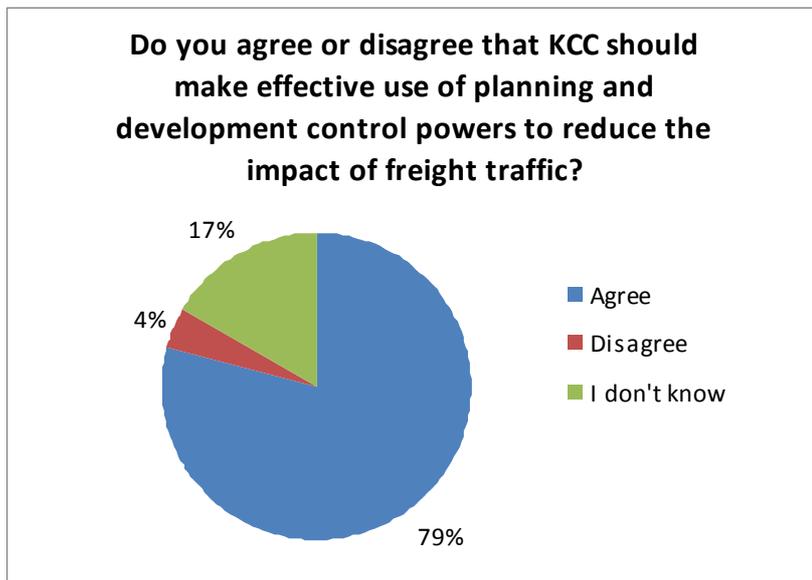
- “The introduction of the new pictorial unsuitable for HGV sign needs to be rolled out as soon as possible.”

- “We would ask that consideration be given to the use of cameras to monitor and enforce width-restrictions.”
- “Prevent parking where they damage and block pavements.”

Two respondents seemed confused about the actions proposed in the Plan and both had answered “I don’t know” to the initial question. Another respondent said conflicts will arise as communities also need jobs.

The new sign is being used across the county already and the first Lorry Watch is being set up. Rather than using cameras we are working with volunteers to record details of lorries using inappropriate routes, such as areas with weight restrictions. We will then work together with Kent Police, drivers and operators to resolve these problems. As enforcement is a Police responsibility operation of enforcement cameras would also come under their remit, due to the resources required to run this it is unlikely to be feasible – in staff time and cost and equipment cost.

Objective 5

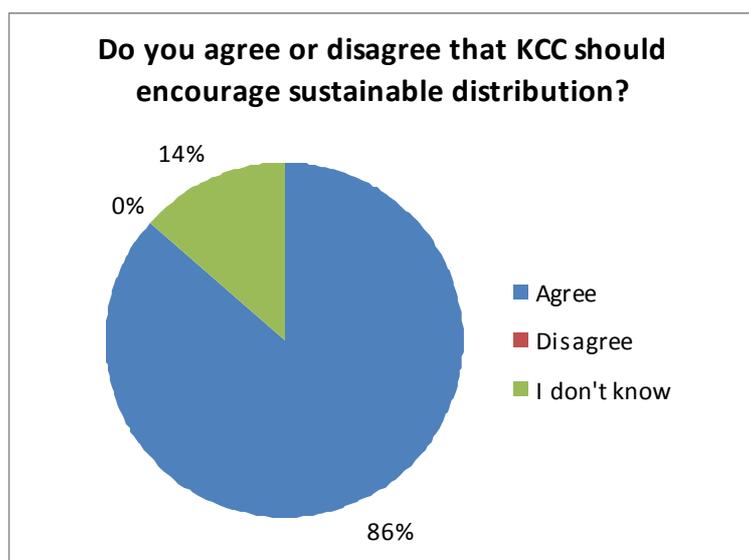


One person disagreed with this objective stating that “with out hg’s kent county council would not operate as them selfs would not get their supplies and with out truck england would not move *[sic]*.” Comments included:

- “Delivery and Servicing Plans should be obligatory...”
- “it would depend on the effect on the business of any anti-freight actions.”
- One suggestion was that lorry parks will have to be free to use, although this is not directly relevant to the objective.
- “KCC would have to convince stakeholders that such powers can reduce adverse impacts rather than merely redistribute them.”

No comments in relation to this objective are particularly controversial and no changes are required in the FAP.

Objective 6



Three people responded with “I don’t know” for this objective. There was general support for sustainable modes of freight, in particular the use of trains. However, one responded was disappointed “to find no mention of the contribution that cargo bikes can make.” They asked that the Plan encourage the promotion of edge-of-city hubs using cargo bikes to serve city centres.

Two responses asked for clarification, one on the definition of “sustainable” and the other on the conflict between increasing high volume low weight traffic and the unsuitability of rail to these goods.

Another responded with “objective 6 is a great idea but I would like to think that KCC would see this as added benefit.”

This objective and the Plan generally, have not been designed to prescribe what is and is not a sustainable mode of freight distribution. However, cargo bikes have now been included in the Plan as another possible mode. A definition of “sustainable” has also been included in the glossary section. The Plan has purposefully had minimal actions on increasing the use of rail freight and any conflicts will be picked up in the Rail Freight Action Plan.

Two respondents left this question blank so the sample size is 22. This might suggest that objective 6 is of less interest to people compared to the other objectives.

General comments

A number of comments were received that did not pertain to a particular objective but to the FAP more generally. Suggestions included:

- “Modal shift should be thought of as a commercial as well as transport issue. Currently, rail relies on extensive subsidies...”

- “Freight traffic from abroad should be charged for using our roads...”
- “Provision of facilities can be paid for the by charging of foreign vehicles entering the Channel ports.”
- “the plan needs to be of a scale that is sufficient for future needs...[sic]”
- “EU legislation permitting large lorries is very damaging to small country lanes such as those in Selling. A change to these laws to limit size in these areas would be a benefit.”
- Another responded emphasised that KCC should use all existing powers now whilst the Plan is under development.

A couple of people had concerns about the Plan:

- “You make no mention of the possibility of encouraging freight in the air via Manston airport. Having a 747 fly over your house at 600 feet is equally if not more disturbing than having a lorry park at the end of your road.”
- In relation to educational work, “It seems to imply that the public should accept ever-increasing congestion and pollution rather than tackling the source of the problems.”
- “The plan...seems to offer little that is concrete.”

Road user charging has been left out of the Plan because it would be central government that implements it, although KCC does lobby for a charge on foreign vehicles and for a proportion to be given to KCC to mitigate their impacts. The FAP does not deal with air freight and operation of Manston Airport is subject to its planning consents.

In order to maintain our current standard of living, including shopping at supermarkets and in town centres, delivery of online shopping, construction, etc., freight will be on our road network. Education can help people to accept this and to think about how they are generating freight, which in turn can have an impact in reducing the amount of freight on the road network. Accompanied with measures to reduce the impact of these necessary lorries and vans then the Plan can have a tangible impact.

5. Conclusion

The FAP online consultation has been largely positive with the majority of respondents supporting the objectives in the Plan. No significant omissions have been highlighted and as a result minimal amendments to the document have been made.