

FREIGHT ACTION PLAN FOR KENT

WRITTEN REPRESENTATIONS

This report sets out the written representations made to the 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 although there were some late submissions up until 10th August 2012 that have been included.

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 this is included in the analysis below.

Notification of the consultation was sent to a number of stakeholders, including the Districts and Boroughs, Kent Association of Local Councils and Kent Police. A draft copy of the Plan had been sent to this group of stakeholders during April and May in order to receive and resolve their comments before the Plan became a public document.

The analysis below will detail common themes and any concerns expressed. The full list of consultation comments and the FAP response to them is available on request.

2. 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.

Welcoming action from KCC

Many of the written representations made to KCC have welcomed the FAP and the positive steps being taken to tackle problems caused by freight within the county. There has been much support for the actions and offers of assistance in implementing them, such as involving Parishes in future reviews of lorry signing.

Habitats Regulation Assessment

Kent Wildlife Trust and Dover District Council both asked if a Habitats Regulations Assessment (HRA) had been carried out on the Plan. Natural England stated that:

Natural England does not wish to make any further comments other than those in our email dated 15 May. We do not consider that this document poses any likely or significant risk to those features of the natural environment for which NE would otherwise provide a more detailed consultation response and so does not wish to make specific comments on the details of this consultation.

With their email of 15 May stating:

Many of the actions in the plan are around the management of existing systems and assets, and they may have some impact on the natural environment. A few, such as the Operation Stack Lorry Park (Action 1.2) and the routing of lorries (Action 3.2, inter alia) may have an environmental impact, and some preliminary assessment of the plan and/or key proposals in terms SA/SEA/HRA may be necessary and would be helpful in finalising matters.

It is considered that an HRA or other environmental/sustainability assessments are not necessary at this stage as the Plan is an outline of what KCC will work towards. As the actions become projects and schemes further assessment will be carried out.

Rail freight

Some organisations consider that rail freight should feature more prominently in the Plan. For example, Dartford Borough Council asked that developing rail heads at or near to the Kent ports should feature, and Lyminge Parish Council asked if transferring as much freight off the roads and onto rail remained a KCC policy.

The references to rail freight and its benefits have been increased in the Plan and support for this mode emphasised compared to the previous draft that was subject to stakeholder consultation in April/May. Consequently there have been far fewer requests for additions to actions supporting rail freight. Therefore, objective 6 and other sections of the Plan will not be amended further.

Local issues

As might be expected, many of the written comments make references to problems in specific areas of the county that respondents want formally acknowledged in the FAP. The decision has been taken to not include further local examples to prevent the Plan becoming cumbersome. It is an outline and actions will be tailored to specific areas as it comes into effect. Several Parish Councils replied regarding the busy A25 and poor connectivity to the

motorways, supporting the Junction 5 slips campaign. This was added to the Plan in the introductory sections rather than as an action because it is a wider strategic issue that is already included in Growth without Gridlock.

Detailed suggestions

Other respondents offered detailed suggestions of measures that could be listed in the FAP, including:

1. Designing out interactions between lorries and vulnerable road users (e.g. segregated cycle routes);
2. More mirrors, sensors and cameras on lorries;
3. Encouraging parking in prescribed industrial estates in preference to lay-bys;
4. Assessing when a route is reaching its capacity of HGV movements; and
5. Use of signs on the HA network to prevent HGVs diverting on the local road network.

Some of these are outside the scope of the Plan (1 and 2) and others may develop as a result of existing actions. Numbers 4 and 5 have been added to the action table as a result of suggestions made in the consultation.

Other matters

Comments were also received on matters outside the scope of the Plan, such as returning the Dartford International Freight Terminal (DIFT) to use, the school selection system creating unnecessary car and bus use, investigating why freight traffic enters via Dover and not the east coast ports, and construction of a link road between the A2 and M2 in the Ospringe area. These have been excluded from the Plan and referred to the relevant team where appropriate.

5. Conclusion

Like the online consultation, written responses to the FAP have been largely positive. A few corrections have been made, some detail added and the action table updated as a result of the responses received.