Kent is unique in its strategic location in the country as a gateway to mainland Europe. Road freight makes a significant contribution to Kent’s economy and it is important to recognise the positive benefits this brings to Kent and the UK as a whole. Despite these benefits there are negative implications of road freight and we must ensure that residents and visitors to Kent are not disadvantaged by these.

Kent County Council’s draft Freight Action Plan (FAP) outlines what we have already achieved and what we plan and continue to do to mitigate the negative impacts of road freight in Kent.

We will be consulting on the draft Freight Action Plan for an eight week period from January 16th to March 12th. Your responses will help us to develop our policy, which will be presented as a final draft at KCC’s Environment and Transport Cabinet Committee in the summer of 2017, as part of the document approval process.

This questionnaire can be completed online at kent.gov.uk/freightactionplan. Alternatively, fill in this paper form and return it to: Transport Strategy Team, Kent County Council, Invicta House, County Hall, Maidstone, Kent ME14 1XX

Please ensure your response reaches us by Sunday 12th March 2017

Privacy: Kent County Council collects and processes personal information in order to provide a range of public services. Kent County Council respects the privacy of individuals and endeavours to ensure personal information is collected fairly, lawfully, and in compliance with the Data Protection Act 1998.

Alternative formats: To request a hard copy of the draft Freight Action Plan, or for any other formats or languages, please email: alternativeformats@kent.gov.uk or call: 03000 421553 (text relay service number: 18001 03000 421553). This number goes to an answering machine, which is monitored during office hours.

Q1. Are you completing this questionnaire on behalf of:
Please select the option that most closely represents how you will be responding to this consultation. Please select one box.

☐ Yourself as an individual
☐ A local community group or residents association
☒ A Parish / Borough / District Council in an official capacity
☐ A charity, voluntary or community sector organisation (VCS)
☐ A Trade Association (e.g. Freight Transport Association)
☐ A Business
☐ Other, please specify: ______________________________________

Q1a. If you are responding on behalf of a community group, resident association, council, business, trade association or any other organisation, please tell us the name of your organisation here: Dartford Council

Q2. Please tell us your postcode: ________________________________
We use this to help us to analyse our data. It will not be used to identify who you are.

Q3. Does road freight traffic have a negative impact on you / your local community?
Please select one box.

☐ Yes (X)
☐ No
☐ Not applicable
☐ Don’t know

Q3a. Please add any comments you have on the impact of road freight traffic here:

Two strategic roads run through Dartford Borough, i.e. the A2(T) and M25/A282 Dartford River Crossing with a number of junctions providing access from Dartford’s local highways to the strategic network. The Freight Action Plan (FAP) states 70,000 freight vehicles use the Dartford Crossing each day. This is understood to represent around half of all trips through the Crossing. In addition a number of freight generating commercial developments are located in the Borough and particularly around the Crossing area.

The Borough experiences a number of problems with road freight particularly arising from queuing and freight traffic diverting from the Strategic Road Network (SRN) onto the local road network.

Roads become heavily congested at times of ‘incidents’ particularly associated with
the Dartford crossing but also on the A2. During these times, freight vehicles are held in long traffic queues on the SRN and also divert to local routes in an attempt to circumvent the delays, Dartford has experienced multiple and prolonged instances of this nature in recent years. This results in:

1. Severe congestion on local roads and Dartford Town Centre in particular affecting the day to day travel of residents.
2. Impacts on the efficient operation of Fastrack and other bus services, undermining reliability and journey times and making these options less attractive as an alternative mode of transport and thus undermining the required modal shifts.
3. Impacts on reliability and journey times for local businesses, thereby affecting their costs and viability and reduction in the attractiveness of Dartford for inward business investment.
4. Poor air quality which has significant impacts on the health of Dartford residents. Pollution, particularly exacerbated by queuing freight traffic, has seen a step change in monitored levels in recent years with levels of nitrogen dioxide significantly above the EU Directive on Air Quality measured at some monitoring points, particularly at the Dartford Crossing Approach Rd and through Dartford town centre, where freight traffic frequently diverts.

Q4. Does inappropriate lorry parking have a negative impact on you / your local community?

Please select one box.

Yes [X]  No [ ]  Not applicable [ ]  Don't know [ ]

Q4a. Please add any comments you have on the impact of inappropriate lorry parking here:

Residents along the London Road in the Horns Cross and Waterstone Park areas, as well as those in the Joyce Green area periodically report issues around inappropriate lorry parking.

Complaints relate to radios, engines, refrigeration units run at night, creating noise and affecting residents sleep.

Action 1

Q5. To what extent do you agree or disagree with KCC’s approach to tackling the problems of overnight lorry parking in Kent (pages 9 to 12 in the FAP)?
Q5a. Please add any comments you have on Action 1 here:

Whilst the survey findings recorded in the FAP suggest that Dartford is one of the least affected areas by inappropriate overnight cross channel lorry parking, it is recommended that this situation is periodically monitored by the County Council given that complaints are periodically received from residents and a significant proportion of cross channel freight uses the Dartford Crossing. Officers are aware that districts within Kent and elsewhere are stepping up enforcement action on this matter which may result in displacement of inappropriate parking to other areas of the County including Dartford.

It is noted that KCC are developing a strategy for a network of smaller lorry parks. Whilst these may assist with issues of inappropriate overnight cross channel parking, the Action Plan should note that these parks could also assist in alleviating issues of long and prolonged traffic queues during periods of severe congestion; particularly at the Dartford Crossing, by providing space for lorries to await conditions to improve away from the Dartford area. This may assist in alleviating the issues and impacts described in Q3a above. The car parks must contain real time information on travel conditions for parked freight traffic.

Action 2

Q6. To what extent do you agree or disagree with the approach to finding a solution to Operation Stack (pages 13 to 14 in the FAP)?

Please select one box.

Q6a. Please add any comments you have on Action 2 here:

No specific comments on Operation Stack. However, the severe impacts of HGV’s in Dartford, as a result of the Dartford Crossing being the main route for these vehicles from the Channel Ports, is a major omission from the Plan and deserves addressing. KCC are already working very closely with Dartford Council and Highways England to reduce the incidents caused by HGV’s at the Dartford Crossing. The actions being progressed, as well as future actions which could be pursued, should be set out in the Plan.
Action 3

Q7. To what extent do you agree or disagree with KCC’s approach to managing the routeing of HGV traffic to remain on the strategic road network where possible (pages 15 to 16 in the FAP)?

Please select one box.

<table>
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<th>Disagree</th>
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Q7a. Please add any comments you have on Action 3 here:

The use and promotion of the KCC Freight Journey Planner and other new technology to assist in live vehicle communications is supported. The FAP would benefit from more details on the project and programme for roll out to be given on the A2/M2 alert scheme referenced in the report.

Additionally a commitment to working with Highways England and any other relevant bodies involved in rolling out similar or complementary schemes should be set in the Action Plan to avoid duplication or over complexity of systems for operators.

The Plan refers to restrictions KCC have put in place to limit the inappropriate routeing of HGV’s through villages. Dartford Council supports this as it is a significant issue in Dartford, particularly when incidents occur on the Dartford Tunnel approach Road and the A2. It would be helpful if KCC were to explore extension of the scheme to this Borough, to address the problems in our local villages affected by the frequent and severe disruptions on the Strategic Road Network running through the Borough.

Action 4

Q8. To what extent do you agree or disagree with KCC’s steps to address the problems caused by freight traffic to communities (pages 17 to 18 in the FAP)?

Please select one box.

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Q8a. Please add any comments you have on Action 4 here:

N.A

Lorry Watch is a joint project between Kent County Council and Kent Police where local residents are empowered to record the details of large vehicles using unsuitable routes or routeing through areas with a weight, height or width restriction.

Q8b. Were you aware of the Lorry Watch scheme available to residents / Parishes in Kent before taking part in this consultation?

Please select one box.

Yes ☑ No ☐ Don’t know ☐

Action 5

Q9. To what extent do you agree or disagree that KCC makes effective use of planning and development control powers to reduce the impact of freight traffic (page 19 in the FAP)?

Please select one box.

Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree ☑ Strongly disagree ☐ Don’t know ☐

Q9a. Please add any comments you have on Action 5 here:

It should be noted that DC powers to reduce the impact of freight traffic will primarily be implemented through the plan making function of local districts in Kent.

The reference in the Action Plan to freight generating developments being located with good access to the SRN is supported. However this objective is likely to be progressed through the identification of sites in Local Plans. Planning conditions and obligations can be used appropriately to mitigate impacts of freight generating sites on the local and SR network. It is suggested that the Plan be expanded to set out more detail on potential mitigations that could be required through planning obligations. This should include specific measures and monitoring set out in a Transport Plan for each site. Dartford Council is able to provide some examples of the mitigation approaches being discussed with the Howbury SFRI applicant, which deals with both local and strategic network issues.
Q10. If there is anything else that you think should be included in the Freight Action Plan, or if you have any other comments please write these in below.

Whilst the Plan provides a set of high level actions for addressing Kent’s freight issues it should set out more specific actions that will be undertaken by KCC or with/by its partners. A clear set of identified actions together with who will take responsibility and indicative timescales will enable ongoing evaluation of the effectiveness to ensure the high level actions identified in the report are progressed. In particular identification and evaluation of schemes should address significant congestion hotspots with a significant freight element. This particularly relates to the Dartford Crossing, which has no specific actions identified in the Plan but creates severe impacts in the local area as a result of the high volumes of freight traffic using it. It is considered that the gravity of the impacts arising at the Dartford Crossing is deserving of specific actions related to it in the Plan. The Action Plan should acknowledge that the high level actions in the report together with other localised actions and planning obligations have the potential to assist in alleviating impacts of freight traffic in local areas including addressing air quality issues.

The delivery of the proposed Lower Thames Crossing at Location C, east of Gravesend, would provide significant relief for the Dartford Crossing. Support for this option is provided in the Local Transport Plan. It is suggested that such support should also feature in this Freight Action Plan. The proposal provides the potential for reducing HGV mileage within Kent by providing a shorter route from the Channel ferries to a new River Thames crossing; providing a fit-for-purpose freight route which will result in fewer ‘incidents’ on the network; alleviating the Dartford Crossing of a portion of HGV’s that currently use it and providing far greater resilience when incidents occur, to the benefit of a large part of the Kent Strategic Road Network (SRN). Proposals for short-term mitigations, which are currently being discussed with Highways England, should also be included.

The Council agrees with the support given to the provision of modal shift from road to rail in Kent and notes the reference to Howbury Strategic Rail Freight Interchange (SFRI) in the Rail Freight section of the Introduction of the Action Plan. However, the section indicates strong support for Howbury SFRI and calculates that 300 to 540 HGV movements would be removed from the south eastern road network through the proposal. Whilst it is accepted that the proposed SFRI has the potential to reduce HGV movements on the wider South East Network, there is insufficient evidence and lack of clarity about the eventual operation of the Interchange to be conclusive about its outcomes. It is suggested that the Action Plan could note the potential for the proposal to provide benefits as a result of reduction of long haul freight traffic in the South East. However, since there is current uncertainty on final outcomes, inclusion of estimated HGV reduction figures should be removed, since they could be misleading. It should be noted that the Kent Highways response to this application raised serious concerns about its impacts.

In addition no reference is made in this section to the significant medium and short distance HGV movements that will be generated through the proposal. This will put greater pressure on the already over-stretched strategic and local road network in the vicinity of the Dartford Crossing. The Plan should note that significant
mitigations will be required to alleviate the negative impacts of the proposal for Dartford residents and businesses as well as users of the Dartford Crossing and its approach. In the event that consent for the proposal is granted, the Council requests that KCC commits to working with Dartford Council, Bexley Council, Highways England and the operator to keep the operation of the facility under review and ensure that the mitigations and conditions are fully applied. In particular, that proposals for mitigations at Junction 1a of the M25 are fully assessed and implemented, so as to mitigate the impact of the facility on this critical junction. The Council considers that collaborative action on ensuring that the negative impacts of this proposal are addressed will assist in meeting the aim set out in the Action Plan to ‘mitigate the impact of freight on the County’s road networks and residents’ quality of life’.