



## Freight Action Plan Consultation Questionnaire

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 16<sup>th</sup> to March 12<sup>th</sup>. 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](http://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 12<sup>th</sup> 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](mailto: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.

<input type="checkbox"/>	Yourself as an individual
<input type="checkbox"/>	A local community group or residents association
<input type="checkbox"/>	A Parish / Borough / District Council in an official capacity
<input checked="" type="checkbox"/>	A charity, voluntary or community sector organisation (VCS)
<input type="checkbox"/>	A Trade Association (e.g. Freight Transport Association)
<input type="checkbox"/>	A Business
<input type="checkbox"/>	Other, please specify: <input type="text"/>

**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:**

CPRE Kent (the Kent branch of the Campaign to Protect Rural England)
--

**Q2. Please tell us your postcode: TN27 0AD**

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	No	Not applicable	Don't know
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

<p>All the negative impacts highlighted in the consultation document are frequently raised by our members and the wider public.</p> <p>Kent's highways network is characterised by an extensive network of lanes, many of which are valued because of their history and their contribution to nature conservation, and as a membership organisation we regularly receive reports and queries about rural verges and hedgerows being damaged by over-large vehicles passing one another in routes that are simply too narrow to accommodate them. Similarly, the use of narrow rural lanes by over-large vehicles impacts on the ability of people to walk, cycle or ride safely.</p>
--

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

Please select **one** box.

Yes	No	Not applicable	Don't know
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

We regularly receive comments from members and supporters about the anti-social and often dangerous impacts of inappropriate parking, as well as experiencing this first-hand in travelling for work and leisure.

Issues common to most of those people adversely affected include all of those mentioned in the consultation document, as well as the particular noise disturbance in some inappropriate locations of tractor units and trailers being hitched and un-hitched in residential areas.

**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)?**

Please select **one** box.

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Q5a. Please add any comments you have on Action 1 here:**

CPRE Kent entirely supports the principle of providing a network of smaller lorry parks in appropriate locations. Its enforcement could be supported by extending the use of financial measures such as the HGV levy, which when introduced in April 2014 immediately achieved virtually 100% compliance. An extension to that charge which covered the cost of a serviced space at a lorry park could be a very simple and powerful way of dis-incentivising fly parking of HGVs; it could also support the provision of the network of truck stops which is so badly needed.

## 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.*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

We entirely agree that the closure of the M20 in the event of disruption to the normal use of the channel crossings is unacceptable, for all the reasons stated in the consultation document. However we can not agree that the construction of a single large lorry park is the appropriate solution.

We contend that a better solution would be to avoid the problem of over-congestion within Kent in the first instance, firstly by incentivising the use of other ports of entry and exit and by encouraging modal shift of freight to rail. Secondly, we contend that the worst problems of over-congestion on the channel corridors could be solved through the imposition of mandatory fleet management, so that no HGV driver would feel obliged to race to the front of a physical queue in Kent in the event of disruption to channel crossings. Fleet logistics are already supported by the availability of GPS, tachographs and a wide range of communications technology; it would be a simple matter to operate management systems which allowed drivers intending to use the channel ports (or any other ports) to secure a place in a 'virtual queue' and be called forward from a space in a secure truck stop in a timely manner when crossing capacity is available.

### Action 3

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

*Please select **one** box.*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Q7a. Please add any comments you have on Action 3 here:**

We agree with this practical approach to managing the strategic road network, and we welcome the work being done to improve telematics and other communications. However, please see our comments in response to Question 6a above; the communications systems described in the consultation document for managing the use of the strategic road network could easily be extended to manage traffic in the event of disruption to the channel crossings, without recourse to an expensive and unworkable lorry park as proposed at J11 of the M20.

### 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.*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

We support this pragmatic approach.

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 routing 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:**

Again, we support this pragmatic approach, but suggest that it could be strengthened. We note that the emerging Ashford Local Plan contains a welcome draft policy requiring proposals which will generate significant freight movements to mitigate the harm of those movements. This includes the requirement for such developments to provide for sufficient space so that vehicle movements and parking do not impact on the public highway, and that HGV movements are limited to times of operation which are appropriate to the site. We would welcome the wider application of such policies.

**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.**

We recognise that KCC is keen to maximise the economic benefit to the county of the freight industry, but question whether the highlighted benefits actually take into account the net cost of the negative impacts of HGVs. The damage and wear to road surfaces caused by HGVs is hugely excessive in comparison with smaller vehicles, and research from the Campaign for Better Transport has shown that HGVs are disproportionately more damaging in terms of their contribution to air pollution and the number of serious traffic incidents. These external costs are not borne by the freight industry.

A strong and growing economy undoubtedly needs good transport links for the trade of goods, but Kent is in a unique position as a significant and inevitable bottleneck in transport between mainland Europe and the rest of Britain. There must come a point when the continued expansion of road-based freight transport through the channel corridors ceases to be a good thing for society and for the environment, and will have a serious detrimental effect on the continued resilience of our trading links. We strongly believe that a more sustainable freight strategy would not place such a keen focus on the continued growth of road-based freight through the port of Dover.

**Thank you for taking the time to complete this questionnaire, your feedback is important to us.**