

Joint Transportation Board 14th March 2017

Draft Freight Action Plan for Kent – response from Ashford Borough Council

Introduction

1. Kent County Council have produced a Freight Action Plan for Kent and are seeking consultation responses on the draft document. The Action Plan highlights the actions that have already been taken to deal with freight issues in Kent and what is planned to reduce the impact of road freight on local communities. The Plan sets out five ongoing actions for managing freight through Kent and outlines how those actions can be met through partnership working between KCC, local councils, industry bodies and other affected parties. The Council's proposed response to the various actions are set out in bold italic.

2. Kent's role as a UK Gateway means that a high proportion of HGV traffic heading to and from mainland Europe uses the county's road network. Freight vehicles account for up to 41% of all vehicles on the county's strategic road network via the M2/A2 and M20/A20 corridors. The Plan identifies five key actions.

The Plan outlines five major actions which 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 routing 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*

1.To tackle the problem of overnight parking

3. Kent has a high demand for lorry parking spaces because of its connectivity to Continental Europe attracting high volumes of cross channel freight. Areas for drivers of goods vehicles to stop and park when away from base play a vital role in enabling drivers to refresh themselves and maintain their vehicles, particularly for freight companies based outside the region or country. Lorry drivers are required to take both daily driving breaks and overnight rests as set out by national and EU rules.

4. Currently there is a lack of lorry parking provision which impacts on road users, communities and puts the security of cargo at risk as well as the health, safety and welfare of drivers. It is preferable for lorries to be parked at a managed site that offers safe entry and exit and encourages goods vehicles to park in a formal and well-designed location, rather than parked in roadside lay-bys or on adjacent minor roads.

5. Problems associated with illegal and inappropriate lorry parking include; lorry-related crime/thefts, road safety, damage to roads, kerbs and verges, environmental health issues, littering, noise pollution and reduced personal safety. Refrigeration units and in-cab heaters can require the

engine to be running which contribute towards air and noise pollution. These issues are particularly heightened when parking is close to residential areas. To tackle the problem of antisocial and illegal lorry parking Ashford Borough Council introduced a clamping scheme in 2015. This was necessitated by the amount of HGVs parking on the highway in and around industrial estates blocking accesses and driveways as well as causing a litter problem. Ashford Borough Council Civil Enforcement Officers have a specialist team that undertake patrols specifically to enforce restrictions which apply overnight. Specific areas in the Borough were identified as trouble hotspots for HGV parking. In these areas waiting restrictions were implemented for vehicles with a gross weight over 5 tonnes. The restrictions were put in place from 8pm to 7am the following day. Civil Enforcement Officers can issue warning notices to vehicles breaking the overnight ban, in addition to a Penalty Charge Notice. The warning notices offer advice to the drivers of the restriction and information about dedicated lorry parks in the area. This information is provided in a number of foreign languages. With regards to the £70 fine issued, Ashford Borough Council works with enforcement agents to ensure the charges are recovered, both here and abroad. If vehicles are caught subsequently having not paid the fine, then they are clamped and must pay a release fee.

6. At the proposed Operation Stack lorry area at Stanford West, Highways England has proposals for the site to include 500 overnight lorry parking spaces. Surveys conducted by KCC and other industry bodies suggest that this will be enough to address the problem of antisocial lorry parking in the area. If approved the overnight parking will have adequate welfare facilities and be priced sensibly to encourage use without competing unfairly with existing commercial lorry parks.

7. KCC is developing a strategy for a network of small lorry parks at locations across Kent with the proposed Operation Stack lorry area adjacent to the M20 at Stanford being integrated within this strategy.

Comment

The Borough Council has been at the forefront of enforcing against the illegal parking of HGVs and it is welcomed that this pioneering work is recognised and acknowledged in the report. The Borough Council considers that to effectively enforce HGV parking, changes in legislation are required relating to clamping and to allow Civil Enforcement Officers to inspect registration documents.

The Borough Council strongly agrees with the proposed provision of a network of lorry parks throughout the County. The Council's Local Plan is proposing an increase in the size of the existing lorry park at Waterbrook which is a key part of any future network of sites.

2.To find a long term solution to Operation Stack

8. Operation Stack is a tactical response to queue freight vehicles along the M20 when cross channel services at the Eurotunnel and Port of Dover become disrupted for a prolonged period of time. It was used on a record 32 days in 2015 as the area was hit with unprecedented disruption in the summer. When Operation Stack is implemented other non-freight traffic is diverted from the M20 and onto the A20 which causes delays and unreliable journey times all of which have negative impacts on businesses and residents around East Kent.

9. KCC supports the proposal for a permanent lorry area to reduce or remove the need for freight traffic to be queued on the M20 providing environmental mitigation measures minimise its impact on the surrounding area and on local communities and that property owners are appropriately

compensated. The proposed Stanford West site is located just west of Junction 11 of the M20 and is close to the existing Stop24 Service Area. It is essential that the motorway is kept open for two way traffic flow at all times and is never closed for the queueing of freight vehicles. The decision for Highways England to build a site capable of parking 3,600 HGVs would allow the M20 to remain open in both directions for all traffic during most instances of disruption to cross channel services.

Comment

The Borough Council responded, in 2016, to the Highways England consultation on a proposal to create a permanent lorry area adjacent to the M20 at Stanford. The Council welcomed the proposal to provide a permanent lorry parking area to tackle the problems caused by Operation Stack and help to meet the need for over-night lorry parking and supported the use of the proposed site for what was known as alternative 3, which is for the site to operate as an emergency lorry holding area (with free provision for Operation Stack and Dover TAP/Eurotunnel excess traffic) but with additional chargeable basic overnight parking all year round

3.To effectively manage the routing of HGV traffic to ensure that such movements remain on the strategic road network for as much of its journey as possible

10. HGVs should use the strategic road network for as much of their journeys are possible thereby reducing the impact on the local road network and ensuring separation from local communities. An important influence on whether drivers stick to the strategic network is the use of Satellite Navigation devices. Sometimes drivers can become over reliant on these devices and miss or ignore road signs. This is particularly the case where drivers are not familiar with the area which can result in them using unsuitable roads, or worse case damaging buildings and street furniture. Unfortunately many of the Sat-Nav devices used by HGVs were designed for the use of cars and so do not consider restrictions such as weight, height and width limits.

11. The strategic network cannot be used exclusively for HGV movements as vehicles delivering/picking up goods in the county will need to use the local road network. In order to encourage freight to use the strategic network KCC has adopted and developed the Freight Journey Planner, an online mapping tool specific to HGVs that allows drivers to plan the most effective routes within Kent and avoid weight, width and height restricted routes

12. The tool is free to use for HGV companies and drivers and highlights all stopping, parking and fuel stations within the county as well as pricing. The Freight Journey Planner helps to guide drivers to use the most appropriate roads, avoiding restrictions and roads that were not designed to take their use. The aim is to effectively manage the routing of HGV traffic to ensure that such movements remain on the strategic road network for as much of their journey as possible. The Freight Journey Planner has been promoted via the FTA and RHA to raise awareness amongst their members, truck stops/services, ports, ferry operators/Eurotunnel, as well as driver training courses.

13. Recent developments in technology have led to the DfT promoting the use of connected and autonomous vehicles. The idea is for in-vehicle, vehicle to vehicle and vehicle to infrastructure communications. The systems can communicate a variety of in-vehicle warning information messages to the road user, which can include road works ahead and vehicles ahead braking. The on-road technology wirelessly transmits the latest journey information directly to vehicles which depending on the circumstances could suggest taking an alternative route. A similar system has been rolled out in mainland Europe and a scheme on the A2/M2 corridor in Kent is being developed.

Comment

The Borough Council supports measures to ensure that the routeing of HGV traffic remains on the strategic road network for as much of its journey as possible.

To take steps to address the problems caused by freight traffic to communities

14. When road freight vehicles travel on the local road network they can have an adverse impact on local communities through property damage, vibrations/noise and air pollution. Many towns and villages in Kent were not designed to take large freight vehicles and as such have legal restrictions to limit HGV use. In these cases there are two types of restrictions (environmental and structural) that can be implemented to legally limit HGV traffic along a road.

15. To complement and aid enforcement of these restrictions, Lorry Watch was set up as a joint project between KCC, Kent Police and local communities. Local residents are empowered to record the details of large freight vehicles using restricted routes with a weight, height or width restriction. Residents are provided with temporary signage and high-visibility jackets and organise themselves to collect vehicle details which are then passed onto the KCC Freight Officer. This officer records details and uses the registration numbers to obtain the contact details of British vehicles and where a single company or vehicle is observed more than once the company is contacted. The company is subsequently asked about their business in the area. If they are breaching a restriction then they are warned against further use of the route. Where a company has legitimate business in the area this is fed back to the local community. If the company does not have a valid reason for using a restricted road and is caught flouting a restriction repeatedly the KCC Freight Officer will work with Kent Police and KCC Trading Standards to work towards a prosecution through the courts. Examples of schemes in the county include Smarden, The scheme has proved popular with local communities since being implemented in 2012 with mainly positive feedback from the Parish Councils where the schemes have deterred HGV use.

Comment

The Borough Council supports the Lorry Watch scheme.

To ensure that KCC continues to make effective use of planning and development control powers to reduce the impact of freight traffic

16. KCC acts as a statutory consultee to the district planning authorities. The Development Planning Team within KCC comment on the highway and transportation implications of planning applications to recommend acceptance, modification or raise objection. New developments that are deemed to have a significant impact on the surrounding transport network are required to produce a Transport Assessment that examines the extent of any impact and identifies mitigation measures. Applications with a large volume of lorry movements such as distribution centres or freight interchanges will produce Freight Management Plans outlining how movements will be monitored and potential issues mitigated.

17. As far as is reasonably practicable, developments generating freight movements should be located where there is easy access to the strategic road network, having regard for the preferred freight routeing. When planning applications for developments are submitted, their accesses are assessed for road junction widths and visibility suitable for deliveries and collections by HGVs. During the construction phase of any development a legal agreement or condition can be used to secure a Construction Management Plan that designates lorry routes that construction traffic is obliged to

use. KCC can also ensure that pre and post-construction surveys are carried out to assess any damage done to the surrounding roads and have it rectified by the developers.

18. KCC now monitors applications for Goods Vehicle Operator Licences which are made to the Traffic Commissioner. The Traffic Commissioner for the South East Traffic Area determines applications for Operator's licences. An O licence is the legal authority needed to operate goods vehicles in Great Britain and determines if vehicles can be kept on a particular site. An edited version of the fortnightly "Applications and Decisions" document, retaining only items relevant to Kent, is assessed by KCC, as well as being shared with district partners. The O licence process grants KCC limited rights of objection, which can be made on two grounds. Firstly, based on the safety of the highway at the point of access to the site; and secondly, on environmental grounds such as degradation of grass verges and excessive noise on approach roads for local residents. For objections on environmental grounds KCC tends to work with the relevant district or borough. All objections must be made within 21 days and must be copied to the applicants. KCC can work with applicants to negotiate a solution, and if possible withdraw the objection.

Comment

It is important that the freight transport and traffic implications of planning proposals are taken into account in making planning decisions. The actions being taken by KCC are noted