

Appendix 2 – List of Local Transport Plan Consultation challenges, policy outcomes and objectives and MBC comments

Table 1: LTP5 identified challenges

<b>Challenges</b>	<b>MBC's Response</b>
<p>CHALLENGE 1 - Our highways assets are in a phase of managed decline which in turn risks them becoming less resilient to new pressures.</p>	<p>It is recognised that with current resources, KCC appear to tolerate this position. As part of the actions going forward, it is recommended that KCC should identify parts of the country that have leveraged resources, how they have done so and from there, advocate to bring greater resources to the county.</p>
<p>CHALLENGE 2 - Following a decline in the number of injuries and fatalities on Kent's roads, these levels have risen in 2021.</p>	<p>The fatalities and injuries are a consequence rather than a challenge to Kent's transport system. As currently worded, it is unclear what the actual challenges leading to the increased fatalities and injuries are. We recommend that Challenge 2 should be revised to identify the underlying issues, whether this is safety issues of the highways network, or drivers and road users' behaviours, or something else. This will help identify appropriate plans and actions. Reference should be made to road safety education in this regard.</p> <p>It should also be noted that travel volumes reduced significantly during the pandemic hence the trends currently observed (decline in the number of injuries and fatalities on Kent's roads before 2021) need to be treated with caution.</p>
<p>CHALLENGE 3 - Traffic is causing congestion, poor air quality and negatively impacting Kent's economy.</p>	<p>This challenge should be amended to refer to impacts on health from poor air quality.</p>
<p>CHALLENGE 4 - Transport challenges in Kent arise from how the existing population of 1.6 million people</p>	<p>The description under Challenge 4 seems to be unclear. Stating that impacts of new development have marginal effects can be misleading. MBC suggests that this is revised to state the need to promote and enable sustainable behavioural changes</p>

Challenges	MBC's Response
<p>and 70,000 businesses in the county choose to travel as well as traffic generated by new developments being built.</p>	<p>in light of the current dominant choice of transport mode. It should also acknowledge that this issue will be exacerbated if not addressed, considering the amount of growth (and with it, additional population) being proposed across Kent by Local Planning Authorities in response to national policies.</p> <p>It should be noted that the emerging strategic sites in Maidstone borough (such as Heathlands and Lidsing) offer the opportunities to ensure sustainable travel choices and patterns are embedded from the outset. In addition, these sites offer the economy of scale required to deliver strategic transport infrastructure – which can help address the challenge around funding.</p> <p>It is also recommended that the LTP5 is accompanied by a map showing the proposed strategic settlements across Kent and their associated indicative growth figures (houses, employment land, retail floorspace, infrastructure provided), as well as their status (allocated, safeguarded, or proposed in a draft Local Plan) to investigate the emerging trend for inter-settlement travel and to ensure sustainable transport choices are made available for these accordingly.</p> <p>In light of the new Monitor and Manage approach, further consideration must also be given to the review and financial mechanisms to counter the risks associated with this approach. This is of critical importance when an identified mitigation scheme involves multiple stakeholders, and multiple highways authorities. This is of strategic importance to ensure that when a development fails to achieve its target, arrangements and contributions will have been in place to update the mitigation(s), their costs, and deliver them in time, so that the knock-on effects on the network and other development sites will be minimised.</p>
<p>CHALLENGE 5 - Some indicators of public health, such as obesity and life expectancy, have been worsening.</p>	<p>Worsening public health is an unintended consequence rather than a challenge for the transport system. It is therefore recommended that Challenge 5 is revised, for example, to state that the current business as usual transport trends will lead to</p>

Challenges	MBC's Response
	<p>negative impacts on public health, as currently shown by some indicators.</p> <p>The description text under Challenge 5 currently reads: 'These trends are made more difficult to tackle as we have become increasingly less active as part of our travel. Activity levels for public transport and walking and cycling are far higher compared to door-to-door private transport.'</p> <p>It is suggested that this paragraph is revised to elaborate further on how the challenges relate to the named public health indicators (obesity and life expectancy). In addition, indicators for public respiratory conditions should also be included.</p> <p>(Policy Outcome 5A should then be revised to reference active travel and public health accordingly. See comments further below)</p>
<p>CHALLENGE 6 - The financial viability of the public transport service has declined due to cost pressures and changes in passenger demand, leading to cuts in public transport services.</p>	<p>No comment.</p>
<p>CHALLENGE 7 - Kent's international gateways need government leadership – the impacts which arise and affect our local communities and the national economy cannot be resolved entirely by ourselves.</p>	<p>Maidstone borough experiences significant adverse impact when the gateways at Kent's ports experience high demand resulting in implementation of Operation Brock. The consequences include congestion on the local road network and severance effects for communities. The absence of appetite at national level for sustainable solution needs to be addressed and KCC has a critical role in lobbying and using its influence in this regard.</p>
<p>CHALLENGE 8 - Related to all the previous points,</p>	<p>It is concerning that the cumulative impact of the transport policies currently being pursued by KCC and those set out for LTP5 do not produce a significant</p>

Challenges	MBC's Response
<p>carbon dioxide (CO<sub>2</sub> e) emission reductions from management and use of the road network are forecast to remain at too high a level compared to the reduced levels needed to contribute towards reducing the worst effects of climate change.</p>	<p>reduction in emissions and that options are not included to give the public choice with respect to changes to the transport systems that would achieve greater progress towards carbon zero targets</p>
<p>CHALLENGE 9 - We need more funding and need to know what funding we will have over the next few years so we can improve transport in Kent.</p>	<p>Question is raised whether KCC has exhausted all funding options, including any unused SELEP funding.</p> <p>MBC would like to raise the lack of progress on ITS schemes despite the S106 funding secured from allocated development.</p>
<p>Additional comments</p>	<p><i>An additional challenge to be considered is the increasing number of electric vehicles and alternative zero carbon transport. This requires a holistic coordinated approach with energy and transport sectors to plan before their impacts become much bigger issues on public areas, for example, charging infrastructure, grid capacity (to facilitate these vehicles without straining the grid), grid greening, infrastructure becoming outdated, etc. There is scope to work with electricity and transport operators and other stakeholders to plan for and to future-proof supporting infrastructure.</i></p>
<p>Additional comments</p>	<p><i>It is recommended that the LTP5 makes reference to a changing context regarding the levels of car driver licence holding, the cost of travel, the demographic change and consequently what implications these have on transport needs and transport planning. For 25 years, each new generation of young people has been taking up progressively fewer driving licences and undertaking fewer trips and less mileage by car.</i></p>

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	<p>The trend has gone almost unnoticed by transport policy makers, but it is likely to continue. This has major implications for transport policy.</p> <p><a href="https://www.transportforqualityoflife.com/u/files/190118%20Why%20are%20younger%20people%20travelling%20less%20by%20car%20What%20follows(1).pdf">https://www.transportforqualityoflife.com/u/files/190118%20Why%20are%20younger%20people%20travelling%20less%20by%20car%20What%20follows(1).pdf</a></p>

Table 2: LTP5 identified policy outcomes

Policy outcomes	MBC's response
<p>POLICY OUTCOME 1: The condition of our managed transport network is kept to satisfactory levels, helping to maintain safe and accessible travel and trade.</p>	<p>Support. The Council would like to see the A229 Blue Bell Hill between M20 junction 6 and M2 junction 3 and B2079 to Marden from A229 added to the Resilient Road Network Map figure 14 page 35. Also, a label for the A229 to the south of Maidstone should be added to figure 14.</p>
<p>Additional Policy Outcome</p>	<p>A new Policy Outcome should be added [or: Policy Outcome 1 should be revised] to state that the emerging strategic settlements and existing settlements will be supported and connected in a holistic way. This would consider growth proposed by the Council in its emerging Local Plan Review at the Garden Community locations in the Borough.</p>
<p>POLICY OUTCOME 2: Deliver our Vision Zero road safety strategy through all the work we do.</p>	<p>Support – no further comment</p>
<p>POLICY OUTCOME 3: International travel becomes a positive part of Kent's economy, facilitated by the county's transport network, with the</p>	<p>Support – no further comment</p>

Policy outcomes	MBC's response
negative effects of international haulage traffic decreased.	
POLICY OUTCOME 4: International rail travel returns to Kent and there are improved rail and public transport connections to international hubs.	Support – no further comment
POLICY OUTCOME 5: Deliver resilient transport, future-proofed for growth and innovation, aiming for an infrastructure-first approach to reduce the risk of highways and public transport congestion due to development.	<p>Support.</p> <p>Reference to public health and active travel should be added to align with Challenge 5. In addition, as set out elsewhere in the document, it is not only development but also the dominant choice of transport that poses challenges to Kent's transport system. As such, reference of 'due to development' should be removed.</p> <p>It is recommended that Policy Outcome 5 is revised to read: 'Deliver resilient transport, future-proofed for growth and innovation, aiming for an active travel and infrastructure-first approach to reduce the risk of highways under capacity and public transport congestion and public health impacts due to development.'</p>
POLICY OUTCOME 6: Access to Kent's historic and natural environment is enhanced.	Support. Policy Outcome 6 should be amended to consider other tourism or leisure destinations as well.
POLICY OUTCOME 7: Road-side air quality improves as decarbonisation of travel accelerates, contributing towards the pursuit of carbon	Support – no further comment

<b>Policy outcomes</b>	<b>MBC's response</b>
budget targets and net zero in 2050.	
POLICY OUTCOME 8: A growing public transport system supported by dedicated infrastructure to attract increased ridership, helping operators to provide more and invest in better services.	Policy Outcome 8 should also add increase the coverage of the public transport system/ service to previously inaccessible areas. As it should not be just about improving existing infrastructure and services.
POLICY OUTCOME 9: Transport makes a positive contribution to public health due to increasing numbers if people using a growing cycling and pedestrian network with dedicated infrastructure, and any increase in disturbance from aviation noise is avoided.	Support – no further comment

Table 3: LTP5 policy objectives

<b>Policy objectives</b>	<b>MBC's response</b>
1A) Achieve the funding necessary to deliver a sustained fall in the value of the backlog of maintenance work over the life of our Local Transport Plan.	Support – no comment

Policy objectives	MBC's response
<p>2A) Achieve a fall over time in the volume of people killed or very seriously (life-changing) injured occurring on KCC's managed road network, working towards the trajectory to reach zero by 2050.</p>	<p>Support – no comment</p>
<p>3A) Increase resilience of the road network serving the Port of Dover and Eurotunnel crossing, by adding holding capacity for HGV parking across the southeast region equivalent in capacity to Operation Brock, to reduce reliance on these disruptive schemes and the burdens and impacts they create on the transport network and affected communities in Kent.</p>	<p>The Council does not support this objective as currently expressed as it is not strong enough in its commitment to eliminating the need for Operation Brock which has an impact on the economy and residents of the Borough through the delays, congestion and severance for Maidstone's communities caused when it is in use. The objective should be reworded to state that the need for Operation Brock will be eliminated.</p>
<p>3B) Increase resilience of the road network servicing the Port of Dover through delivery of the KCC bifurcation strategy including improvements to the M2 / A2 road corridor and its links to the M20 and a new Lower Thames Crossing for traffic towards the north.</p>	<p>The Council does not support this objective at the present time as it feels it not to be worded strongly enough with regards to the 'outcomes for rural communities'. Operation Brock cuts rural communities off and makes everyday life much more challenging in the Borough. Lived experience was gathered from a recent survey the Council undertook in the Borough (August 2022) 'How does Operation Brock impact you?'. The results of the survey can be found on the link below:</p> <p><a href="https://www.lets-talk-maidstone.com/engagement/2022/08/how-does-operation-brock-impact-you/">How does Operation Brock impact you?   Lets Talk Maidstone (engagementhq.com)</a></p>



Policy objectives	MBC's response
<p>4A) International rail travel returns to Ashford International and Ebbsfleet International stations, supported by the infrastructure investment needed at Kent's stations wherever necessary.</p>	<p>Support – no further comments.</p>
<p>4B) A fall in the time it takes by public transport to reach international travel hubs compared to conditions in 2023.</p>	<p>Support – no further comments.</p>
<p>5A) Strengthen delivery of our Network Management Duty to deliver the expeditious movement of traffic by using our new moving traffic enforcement powers and keeping on-street parking enforcement, delegated to the Districts, under review.</p>	<p>The Council seeks clarification what is meant by 'keeping on-street parking enforcement, delegated to the Districts, under review'.</p>
<p>5B) Reduce the amount of forecast future congestion and crowding on highways and public transport that is associated with demand from development by securing funding and delivery of our Local Transport Plan.</p>	<p>The Council would like to see this amended to include the provision of highways improvements and the retention of the Leeds Langley Relief Road from LTP4.</p>

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<p>5C) The prospects for the future of transport increase across the whole county, with new innovations in transport services having a clear pathway to trial or delivery in Kent.</p>	<p>In light of MBC's high expectations for new housing in the town centre and new garden communities, this is strongly supported.</p>
<p>6A) Proposals in our Local Transport Plan are clearly evidenced in terms of their contribution in providing new, faster, or more inclusive access to historic and natural environment destinations in the county, with proposals targeting access to such locations where appropriate.</p>	<p>Policy Objective 6A: MBC would like to see Maidstone town centre with its significant heritage is also featured – and its status as county town is also highlighted.</p>
<p>7A) Reduce the volume of carbon dioxide equivalent emissions entering the atmosphere associated with surface transport activity on the KCC managed highway network by an amount greater than our forecast "business as usual" scenario. This means achieving a greater fall than those currently forecast of 9% by 2027, 19% by 2032 and 29% by 2037.</p>	<p>Policy Objective 7A: As currently worded, achieving 'a greater fall than those currently forecast' in transport emission does not provide the confidence that we will achieve net zero carbon target. In addition, this is accompanied by a set of policy objectives referencing EV expansion (Objective 7B) and development in the Air Quality Management Areas (Objective 7C). Whilst these are welcomed, MBC considers that more fundamental changes are required to meet the net zero carbon target. MBC urges KCC to show leadership in identifying these objectives for the county as a whole which could then be implemented locally through ITS and Local Plans.</p>

<b>Policy objectives</b>	<b>MBC's response</b>
7B) No area in Kent is left behind by the revolution in electric motoring, with charging infrastructure deployed close to residential areas, reducing barriers to adoption.	Support – no further comments
7C) Proposals are clearly evidenced in terms of their contribution in providing lower emissions from transport in Air Quality Management Areas in the county.	Support – no further comments
8A) We will aim to obtain the further funding to deliver the outcomes our Bus Service Improvement Plan (or its replacement) beyond its current horizon of 2024/25. We will ensure that our Local Transport Plan proposals are clearly evidenced in terms of their contribution towards achieving our Bus Service Improvement Plan.	Support – no further comments
8B) We will identify and support industry delivery of priority railway stations for accessibility	Support – no further comments

Policy objectives	MBC's response
<p>improvements and route improvements to reduce journey times and improve reliability.</p>	
<p>Additional policy objective suggested</p>	<p>New policy objective 8C: To support improved new public transport routes in the county such as the extension of Thameslink to Maidstone Railway Stations.</p>
<p>9A) We will aim to deliver walking and cycling improvements at prioritised locations in Kent to deliver increased levels of activity towards the Active Travel England target and support Kent's diverse economy, presented in a Kent Walking and Cycling Infrastructure Plan.</p>	<p>Policy Objective 9A: MBC has put forward a number of prioritised locations in Maidstone based on the: Maidstone Local Plan 2011-2031, emerging Maidstone Local Plan Review, Maidstone Integrated Transport Strategy 2011-2031, and the Maidstone Walking and Cycling Strategy 2011-2031 when it responded to the KCWIP stakeholder consultation in July 2023.</p> <p>MBC welcomes opportunities to work together to ensure these locations (and any other locations that KCC considers appropriate) are included in the Kent Cycling and Walking Infrastructure Plan. MBC would like to see further progress on this work. MBC would like to emphasise the importance of its timely progress to ensure a holistic approach to sustainable transport at all levels.</p> <p>Maidstone Borough Council would like to know where the prioritised locations are and how they will be selected.</p>
<p>9B) Represent and protect Kent residents from the impact of noise disturbance arising from new and expanded airports including maintaining our opposition to a second runway at Gatwick and the need for a reduction in night flights.</p>	<p>Support – no comment</p>