

## **DRAFT**

### **LOCAL TRANSPORT PLAN FOR KENT 2011 – 16**

#### **Draft for consultation**

#### **RESPONSE FROM MAIDSTONE BOROUGH COUNCIL**

Before commenting on the Local Transport Plan, I would like to set out the Maidstone specific transport issues as the Borough would look to the Plan to put in place measures to remedy the issues and take forward the Borough objectives.

The key issues facing the Borough are:-

- Maidstone is the County town and a focus for housing and employment growth by virtue of designation as a Growth Point and a Regional Hub; this creates the need for improved infrastructure and trip management.
- The town has some good 'raw' strategic road and rail transport links – but with significant "disconnects" in the current networks and services.
- There is currently severe congestion into and around the town and particularly where the "A" roads meet at the bridge gyratory system.
- There is also congestion on the M20 and connecting north-south bound "A" road junctions.
- There is poor air quality and environmental impact where congestion and heavy traffic are prevalent including throughout Maidstone town centre.
- Rail services to London and the Greater South East are relatively limited in destination, slow and infrequent compared to other towns in Kent, especially those with access to HS1.
- Public transport access for rural areas into Maidstone and other service centres is limited.
- Road crash casualty rates are the highest in Kent and significantly higher than those areas with similar traffic flows.
- Operation Stack is highly disruptive.
- The South East Maidstone Strategic Link is needed post 2017 plus the Maidstone Hub infrastructure package and improved services.
- If no SEMSL – then additional trip demand management for existing trips and housing/employment growth is needed.

The objectives of the Borough Council are:-

- To reduce existing road traffic levels.
- Tie together planning and implementation of growth and transport infrastructure and systems through the LDF.
- Support economic growth focussed on Maidstone town centre including enhancing accessibility by sustainable transport (public transport, cycling and walking).
- Support regeneration including in areas of deprivation.
- Unlock key sites including the urban extension and allocated employment sites.
- Reduce road traffic casualties.
- Improve access to London, the Greater South East, national and international markets.

The Borough Council would seek that the actions that flow from the Local Transport Plan would assist it in meeting these objectives, and tackling the issues identified above; particularly in the light of the emerging duty to collaborate in the preparation of plans.

#### GENERAL COMMENTS

The Local Transport Plan should recognise and reflect the joint working of the county and districts as we seek to meet the expectations of the Government in delivering transport and environmental issues at a time of financial constraint, whilst acknowledging and supporting the urgent need for economic growth and development. In this respect it appears disappointing in its vision, actions and plans as it fails to deliver the investment and other measures that are necessary to deliver an appropriate transport infrastructure and network or address air quality management action plans.

The structure of the draft is vague and it is difficult to identify the strategy and the consequent actions. It does not clearly relate itself to other statutory documents like the Local Development Frameworks (LDF). The document does not have a clear vision, or clearly identify the measures it would expect to see in the 5 year implementation plan. The document sets out a short term programme, but it should ideally set out a longer term strategy of investment and actions linked to medium and longer term targets as well.

Reference is made to it being based on the County Council's Regeneration Framework, *Unlocking Kent's Potential*; a 25 year master plan, yet this document only offers very limited action during the five year period and little clear vision and action beyond this. Whilst there is uncertainty as to the funding that is available between 2011–16 it is predicated on the lack of funding rather than the various measures that are required to deliver growth. This is of

particular concern to Maidstone as we have the basis of a transport package to support our LDF, which should be acknowledged and supported to encourage appropriately located regeneration, employment and housing development.

A similar situation exists in respect of environmental issues, where there is a legal requirement to take actions to deliver air quality improvements, the proposed actions appear to be limited or lacking. In practice there does not appear to be a system in place to consult with relevant Air Quality Officers in each District Council regarding annual traffic counts (6.21) and for feeding the relevant statistics back to them. Similar action is also needed in respect of the Air quality modelling facility (6.23).

On cycling issues the LTP 3 addresses our aspirations (i.e. improving the network, instigating behavioural change, improving cycle parking facilities, etc.) but our recent experience has been that actions have not been forthcoming;-

1. Maintenance of the network is currently under resourced. Maintenance and signage issues reported to Kent Highway Services in recent months have received little or no response. There is often confusion as to which department within KCC is responsible for the maintenance of certain off carriageway routes. How then will the desire to provide a comprehensive urban cycle network (8.13) ever be delivered and maintained?
2. Districts were encouraged by KCC to set up their own cycling forums earlier this year (2010). They were left to run these themselves due to lack of available support, which they have done on a "voluntary basis", but feel there is no structure or support in place from local KCC highways services, cycling officer or Public Rights of Way when needed, which similarly raises concerns as to how the desired improvements can or will be delivered.

In 6.31 it is stated that the "recommendations outlined in the 2009 Chief Medical Officer's (CMO) Report and NICE guidelines on increasing physical activity are central to KCC transport policy and practice". That report recommends that national targets should be set to increase travel by bicycle eightfold. Is this the target of KCC, if not what is, and as outlined above how will the measures and infrastructure necessary to deliver any target be put in place given the current difficulties in obtaining engagement and action?

In several parts of the plan statements are out of date or without sufficient detail or clarity, these need to be rectified with greater discussion between the County Council and Districts which is disappointing considering the ongoing joint working which is taking place over these matters. Also in its introduction the LTP ought to refer to the joint working with the planning authorities through the Local development frameworks as these are statutory documents and demonstrate this across the DfT and DCLG portfolios.

Without an implementation plan it is difficult to ascertain the actual effects, positive and negative, on Maidstone of the measures in the plan. This creates concern that appropriate future investment beyond the five year period may then also unnecessarily be constrained resulting in an adverse effect on development.

## SPECIFIC BULLET POINTS

### EXECUTIVE SUMMARY

Whilst the forth para of the executive summary identifies the overall levels of growth in Kent, the two Growth Areas and the deprivation in East Kent, it should also recognise the level of growth that has taken place in West Kent and the need for infrastructure to support it, as well as the need for infrastructure to kick start development in East Kent. This paragraph should also identify the two growth points in Kent as well as the Growth Areas.

P 9 – table of proposed integrated transport budget allocation methodology.

Guidance from Defra (Air Pollution: Action in a changing climate – March 2010) clearly shows that major benefits are to be gained from integrating climate change and air quality policies. This is presumably recognised by its inclusion in both the 'A Safer and Healthier County' and 'Tackling a Changing Climate' LTP themes in the tables of "Proposed spatial distribution of Integrated Transport block funding" in section 4.26 (and table 4.3). It is however not included the same way in the proposed integrated transport budget allocation methodology on pages viii and 50 (table 4.4). This is an inconsistency which could adversely affect the allocation of funds to deliver the necessary actions in respect of Air Quality Management Action Plans.

### CHAPTER 1 – WHY TRANSPORT IS IMPORTANT FOR KENT

1.15, 1.28 and 7.5 Quality Bus Partnerships (QBP). QBP's are regarded as a key measure for delivering improved bus services, to achieve modal shift to address traffic growth in coming years, and in addressing environmental issues in air quality management action plans. However no detailed information is provided on the five QBP's, the actual improvements and passenger growth already delivered, or what is expected from them over the five year period.

It needs to be clearly demonstrated that QBP's represent value for money and why they are included as a measure instead of say Quality Bus Contracts. Their voluntary nature is not clear and unless they are able to deliver the necessary improvements other means must be put in place to do so.

1.29 If Fastrack BRT has been one of KCC's most successful transport initiatives in recent years, what if any plans are there to extend it to other towns? Even if funding is currently constrained such systems tend to take a few years to plan and build, and should therefore be indicated.

## CHAPTER 2 – TRANSPORT RELATED PROBLEMS

2.24 There are 42 AQMA's in Kent, not 36. See also 6.19.

2.26 Whilst the 'Active Transport' section is welcomed it could benefit from the addition of some other statistics e.g;-

Environmental Audit Committee: Fifth report of Session 2009-10: Air Quality (March 2010)

*"The Air Quality Management Resource Centre note that the health impacts of air quality in the UK are almost twice those of physical inactivity, estimated to be £10.7 billion per annum, yet it fails to receive the same level of attention as the latter within medical and media circles. The costs of poor air quality are comparable to the cost of alcohol misuse to society, estimated to be £12-£18 billion per annum. Isabel Dedring, the Mayor of London's Environmental Advisor, said that there was no link between the funding that was available to tackle air quality and the avoided health costs from improvements to air quality. She thought this was not the case for other social health issues."*

## CHAPTER 3 – EXISTING PLANS AND STRATEGIES

3.9 Maidstone Borough Council welcomes the County's view that transport infrastructure investment should be prioritised on the Growth Areas and Growth Points in Kent and would like to see this reflected in the implementation plan and future actions.

3.48 – Maidstone LDF – replace with:

"The Maidstone LDF Core Strategy is now being progressed after the impediments to the progression of the 2007 Preferred Option draft have been removed. The new plan responds to opportunities created by the Coalition Government's commitment to abolish the Regional Strategies; Maidstone Council will be consulting on a new Core Strategy including a locally determined housing target and strategy for the distribution of development. This is being prepared for public consultation in the first part of 2011. The Core Strategy will greatly inform the necessary content of the Local Transport Plan in the Maidstone area - see Chapter 5."

## CHAPTER 4 – THE STRATEGY FOR LTP 3

4.27 – see the comments in relation to P9 of Executive Summary

4.30 Impact scores. This should also include an element to take account of the positive impact that measures will make on Air Quality hotspots and /or Air Quality Management Areas.

## STRATEGY FOR A SAFER AND HEALTHIER COUNTY

5.42 – Modify this to say that Maidstone town is the County town of Kent, the borough has a population of over 150,000, with over half located in Maidstone town. The borough is otherwise substantially rural with five larger rural settlements. The town's main function is as the largest town shopping centre in Kent, with many other services, businesses and public administration.

The town enjoys *good access* to strategic road links...

5.44 – end first sentence – with inadequate highway capacity. The principal constraints are certain congestion spots at key junctions and links and in particular the single crossing..... There is no appropriate route to the M20 from the area to the south of the town. The launch of the .....

5.45 – employment situation - *is this section still an accurate reflection of the current and expected situation? Broadly speaking this is correct but rather vague and a loose form of words e.g. current employment situation is relatively prosperous. Perhaps more a more accurate statement would be, GVA per head is high compared to many other Kent Districts and Boroughs.*

5.46 – delete this now erroneous detail and replace with wording similar to 3.48 above. MBC will be able to advice on more appropriate wording as the basis of the draft Core Strategy is firmed up in January – February for consultation in the early part of 2011.

5.47 – Reference to a Park and Ride site on the A274 should be deleted and the wording replaced by:-

The proposed level of development in Maidstone Borough will be underpinned by a 'transport package' containing a number of traffic management measures including the provisions of Park and Ride from sites which will be identified in the LDF.

5.48 – insert "unduly" between "without" and "exacerbating" in line 5. This confirms our LDF objective in terms of dealing with congestion. Park and Ride in Maidstone is used as a tool to help manage the level of traffic entering the town centre, particularly in peak hours. The County Council has a legal duty under the Traffic Management Act to tackle congestion and to manage traffic and they should therefore through the LTP3 make financial provision in the package of measures generally, and in particular for the operation of Park and Ride in the Borough, in order to reduce congestion and pollution.

5.49/5.50 – KCC's support for improvements to the rail services connecting Maidstone to London and elsewhere and their recognition of the critical importance of this issue to Maidstone's economic prosperity is welcomed. However the proposal to extend High Speed Domestic service to Maidstone West needs to be given a higher provenance as it presents the earliest opportunity for obtaining comprehensive and significant improvements in services and journey times between Maidstone and London – particularly if the extension of the

Thameslink network is now to be delayed. In addition the County Council should continue to press the Government to improve the present rail services to the City on the Maidstone East line and for any other interim measures to improve the situation pending HSD and Thameslink in a future franchise period.

The Plan should set out the need to introduce a Parkway station on the Maidstone East line to serve Maidstone, West Malling and London, at a site to be determined.

5.51 In relation to the South East Maidstone Strategic link reference to it is welcomed and the identification of the role it would play in moving traffic from the south east side of the Town to the Motorway is helpful. Reference to it should be retained and amended to identify the wider role it plays but also to recognise that whilst it may remain a strategic aspiration it is unlikely to be funded from the public purse in the present financial climate. It is important that the current Leeds-Langley bypass scheme remain safeguarded in the interim.

5.52 – It is disappointing that the A21 schemes have been cancelled by the Government. The importance of early construction of this scheme needs to be fully emphasised due to its potential impact on the Pembury/Maidstone Hospital debate. Another aspect of this is the removal of DfT funding from the original Kickstart bid for bus service improvements between Maidstone and Pembury Hospital, and the potential for Arriva and KCC to pick up the cost.

In the Maidstone section it would be helpful to confirm that the resilience of the road network in Maidstone is interdependent on the M20, as incidents on the motorway can have a major impact on congestion in the town centre. This is being managed by coordination of the KCC and HA traffic management systems, the Highway Agency Controlled Motorway system, and (in due course) by the HA/KCC Cordon Project for the M20, M2, A229 and A249.

5.54 Traffic management measures to tackle congestion must consider the economic impact of their introduction especially if a policy of negative traffic management is advocated rather than one of increasing road capacity. Should negative traffic management measures be pursued they should be applied to all Kent towns not just Maidstone as this could fundamentally undermine the County town's comparative competitiveness. Cross reference with 5.48

5.62 – Freight. The bifurcation of freight traffic to and from Dover should be pursued so as to reduce congestion and air pollution on the M20, particularly adjacent to the urban area.

In recent years this area has been experiencing increasing problems due to the use of inappropriate routes by freight vehicles, particularly larger, often foreign, lorries. Some of this is caused by the increasing use of storage facilities in rural areas which drivers seek to access from the M20 using GPS equipment which is not designed for HGV use. There is often little, if any signage to indicate the

most appropriate route and which roads are too narrow or otherwise unsuitable for such traffic. This frequently results in vehicles entering narrow roads and lanes causing damage to the highway and adjacent land and property, and at times they become trapped causing gridlock and distress to local residents.

This plan does not seem to offer any strategy or action to help combat what is already a serious problem. At the least local road signs should be urgently reviewed so that drivers receive warning that they are entering a narrow road at a point where they can choose an alternative (e.g. on Brishing Lane southbound from Parkwood the road narrows sign is located at a point where drivers have no alternative or place to turn round).

5.69 and 5.70 – Operation Stack. This section does not give enough weight to the serious wider effects on the highway network and economy of the county caused by the road closures, traffic diversions, congestion, delays and resultant environmental effects which significantly adversely affect Maidstone and beyond. If, as stated, the frequency of imposition of Operation Stack increases these will not only be exacerbated but it will also place at risk economic development and investment in the immediate areas? The County Council, through the Local Economic Partnership, should work with the Government, the Highways Agency and the Police to seek a wider alternative to Operation Stack so that the impact is not concentrated in Kent to the detriment of its economy, traffic movement and attractiveness.

5.70 to 5.73 – Lorry Road User Charging. We support the desire of the County Council that a lorry road user or similar charge should be introduced to deliver a more equitable operating cost for all operators. Any revenue raised should however be used to deliver transport, highway and environmental improvements to areas most affected by these movements and not lost in the wider tax income.

5.74 and 5.75 – Lorry Parking. We strongly support the need to provide sufficient lorry parking to cater for both Operation Stack and overnight parking to mitigate the problems caused by the use of inappropriate locations.

#### STRATEGY FOR A SAFER AND HEALTHIER COUNTY

6.17 – the promotion by KCC of the use of low emission vehicles needs to be more clearly evidenced in this section. It is not clear what actions or results this refers to.

6.18 – This paragraph should identify the linkage between traffic levels, pollution and air quality. In doing that it should recognise that the County Council has a role to play in improving air quality by reducing traffic by managing it and congestion.

6.19 – AQMA's. As per 2.24 there are 42 of these, not 36, and they cover areas other than just the motorways, trunk roads and town centre.



6.24 – Air Quality Action Plans – It is essential that there is agreement on proposed mitigation measures before they are put forward for inclusion in the LTP 3. Whilst the UTMC is valuable other more positive measures are also required if targets are to be met. Maidstone is considering the possibility of a Maidstone Town Centre Low Emission Zone – which links to section 8. We believe that KCC have it within their power to improve the air quality, simply by altering the way in which the traffic lights operate around the bridge area.

In terms of monitoring, it would seem very useful to continue to monitor the use of the Maidstone UTMC system as a target, as this already has created a “history of success.”

6.26 – Pembury Hospital. Improved transport links to Pembury Hospital are essential if any transfer of services from Maidstone Hospital takes place.

6.31 – Active Travel. It would be helpful to know which three areas currently have these and whether Maidstone, as the County Town, can be included.

6.34 and 6.35 – Safe and secure network. These paragraphs appear to be “out of place” and would be better included in or just before 6.39 and 6.40

#### STRATEGY FOR SUPPORTING INDEPENDENCE

7.5 – Quality Bus Partnerships (QBP) – see 1.15. There must be greater clarity as to why these are being progressed instead of other options.

7.8 –At a time of expected job losses, reductions in benefits and disposable income some sections of society will have an increased dependence on the availability of public transport, particularly bus services to access jobs and local services. Unless services continue to be provided, and where necessary supported, this risks trapping people in situations of unemployment and social deprivation.

7.9/7.11 – If there are cuts in bus service provision it is essential that “replacement “community operations and/or taxi based operations enable people to adequately access local services etc. This has not always been the case when conventional services have ceased. A one day a week dial a ride is not a suitable replacement for a daily service.

#### STRATEGY FOR TACKLING A CHANGING CLIMATE

8.6 - the title refers to Low Emission Zones, but there is no description in the text. MBC may be investigating the imposition of an LEZ in the centre in conjunction with its AQMA, so some explanatory text about the London and Oxford schemes would be helpful.

8.7 – the comments on car park charging are somewhat vague and not helpful in determining an overall future strategy for the county and actions that might be taken. Car parking charges form an essential tool in influencing the demand for

transport. There need to be up to date parking strategies both at a county and local level that will help to deliver this without some towns being disadvantaged. It must also include Park and Ride, privately owned, business and out of town centres.

8.13 – At present cycling is not technically permitted on riverside tow paths though it is often observed. Measures to address this should be included. In conjunction with this there is a desire to see improvements in the route between Maidstone and Allington

8.15 - Workplace travel planning largely relies on the provision of alternative means of transport. Will it be there?

#### THE STRATEGY FOR ENJOYING LIFE IN KENT

9.19 – this section makes no mention of the problems that large Lorries cause in rural areas which is a major issue for most communities. The outcomes of the intended Freight strategy could usefully be outlined here.

#### 9.23 Sociable Streets

Maidstone Borough Council welcomes the County's support and understanding of the impact of transport on place making and its enabling role in creating high quality, well designed environments for residents, visitors and investors.

#### USE OF RESOURCES

10.15 to 10.18 – Developer contributions. These should be expanded to cover the promotion and development of low emission practices and schemes. These will become increasingly necessary once travel planning and modal shift measures have been implemented and will help to support the work is already taking place in this area.