APPENDIX I

Swale Borough Council's Response to Kent County Council's LTP5 Consultation

Swale Borough Council would like to thank Kent County Council for providing us with the opportunity to comment on this stage of the Local Transport Plan 5 and would welcome a continued dialogue as you work up the more detailed proposals to be included in the next consultation draft. Swale Borough Council would like to continue to work closely with KCC moving towards the next stage of the LTP5 and the next stages of our Local Plan in order to ensure that sustainable and active travel are fully embedded within both documents and that funding mechanisms are identified. We will also need to ensure that our existing road infrastructure is maintained and fit for purpose.

As the document makes clear, the LTP5 is very high level so sets out the direction of travel and the aspirations but does not contain any detailed proposals, which often drives residents' and stakeholders' interest and engagement.

General Comments

Sustainable and Active Travel

The document is currently highways focused, despite the statement in the document that the "highways are in managed decline". We look forward to seeing more focus on sustainable and active travel measures and intra-urban travel and sustainable solutions for Kent's rural communities through measures such as service hubs in the larger villages, and upgrades to public rights of ways to link the villages to each other and their nearest town.

The LTP5 will not be proposing detailed changes to any bus or rail services. But the proposals in the Plan may enable new services or improved services in the future, if the funding for such can be found. In our view, this narrower perspective hampers the potential for delivery of a fully integrated sustainable transport system.

A proper acknowledgment of the challenges to increased use of public transport needs to be included as it has to compete on cost but also on convenience against the private car and the key factors here are frequency and reliability. Services need to be sufficiently frequent that you barely need a timetable, which will also start at a time which will allow for early/late shifts. Increased frequency for some of the intermediate rail stations, such as Teynham and Newington, would also make a difference; hourly services are simply not good enough to help people make a shift.

From an Active Travel England perspective, they regard LTP5 as a key indicator of the LTA's commitment to rebalance streets away from motorised traffic to walking, wheeling and cycling. This rebalancing will not only improve trip mode choice, it will help residents to escape the financial stress of car ownership, reduce wear & tear on the declining infrastructure as well as all the other obvious positive impacts.

Therefore, we believe that LTP5 needs to be more focused on sustainable and active travel.

The role of public rights of way in upgrading the walking/cycling network needs to be mentioned in the LTP5. In some cases upgrading sections of footpath to bridleway and surface improvements to enable cycling would transform connectivity, especially in some rural areas. This is within KCC's power but we are told that it is difficult and slow. If changes to legislation are needed KCC and SBC should be lobbying for those too, or even use of compulsory purchase. The need for complete networks to deliver modal shift needs to be mentioned, off -road cycle routes delivering you into a fast- moving stream of traffic are not very valuable. Gear Change is mentioned as one of the policy documents giving context to theLTP5, but we would like to see much more of the thinking from that evident in the proposals.

A significant source of noise and air pollution (and highways degradation) in our towns is the vast fleet of home delivery vans. As part of the LTP we would like to see Kent's towns with parcel consolidation centres, enabling carriers to deliver to one location, generally using the strategic road network, and then smaller EVs and cargo e-bikes making the 'last mile' delivery to customers.

Rail

Swale would like the LTP5 to look into the possibility of reopening the rail heads for freight at both Sheerness and Ridham in order to remove some freight off the roads in order to reduce road congestion and improve air quality.

Rail travel appears to be underplayed within the document; with only international passenger journeys mentioned and not journeys within Kent and from Kent to London and other regions. This is a key part of sustainable travel so it is recommended that this section is expanded on in the next draft.

Bus
The recent changes to bus services are of great concern to SBC and we would welcome the opportunity to work with KCC to ensure that services suit the needs of our local residents and Swale's commitment to active and sustainable travel, whilst also being economically viable.

Roads/Cars

Alternatives to private car ownership and use need to be promoted through the document, e.g car clubs.

The discussion of the effects of new road schemes such as the Lower Thames crossing on carbon emissions is welcome, but vague suggestions that these increases will be offset by reductions in other sectors is not a strategy, but aspirational. "A balanced approach that is mindful of carbon emissions" will not be any use against the hard reality of the effect of the physics of CO2 on global boiling, which is completely indifferent to our mindfulness or sense of balance. We should not accept that schemes such as the lower Thames crossing are inevitable.

At present, the highways input to planning seems to focus mostly on safety defined in a very narrow sense of historical accident data. A transport plan should take account of the role of spatial planning in contributing to traffic growth and CO2 production, and vice versa. Reference could be made to current NPPF policies driving CO2 emissions in the opposite direction, with the presumption towards increased development.

Climate Change

Swale are pleased to see that KCC have considered the effect of the plan on carbon emissions to tackle climate change and we hope that they continue to do this as the proposals are worked up in more detail. It is welcome to see that carbon budget challenges so clearly set out, but what is really lacking is any meaningful suggestions as to how those targets will be met, and the volume of reduction of traffic needed. Looking at Fig 10 would imply that even with the optimistic decline in CO2 from 2023 onwards (reversing the change in actual data post-pandemic), we might hit net zero by 2080, though this does mean extrapolating the graph some way off the edge of the page.

To seriously reduce carbon emissions, this needs to be an extremely ambitious plan reflecting a complete change of mindset about transport. The last plan was 'Growth without Gridlock'; could this one be called 'Transformation without Carbon'?

We were pleased to see the priority concerning achieving an Environmental Step Change. However, there is no ambition to reduce the volume of private car mileage or speeds which is the largest contributor to transport sector carbon emissions. Hopefully this will come in the next stage of the LTP.

There needs to be a very different attitude to the provision of electric vehicle charging infrastructure, with all possible solutions for home charging explored, and reversal of some policies currently preventing the use of charging gullies for cables in pavements, and lamppost charging. There needs to be an acknowledgement of the need to upgrade the power network to enable this.

Funding

The documents states that KCC do not yet know how much funding will be required to deliver the full Local Transport Plan so we will be keen to see the fully costed proposals, and funding streams, for all of the proposed transport infrastructure investment in the full Local Transport Plan next year. We have some concerns that the document states that the Government does not require that the plan be constrained by current budgets, which is at odds with Local Plans, which need to show that any required infrastructure is deliverable.

From an Active Travel England (ATE) perspective, they regard LTP5 as a key indicator of the LTA's commitment to rebalance streets away from motorised traffic to walking, wheeling and cycling. This rebalancing will not only improve trip mode choice, it will help residents to escape the financial stress of car ownership, reduce

wear and tear on the declining infrastructure as well as all the other obvious positive impacts. We understand that ATE will use Local Transport Plans for future funding bids so we need to ensure that the document is positive for Swale and includes a suite of projects to assist with the implementation of active and sustainable travel in the borough.

<u>Specific Comments</u>

"Our Ambition" it's a bit wordy. Compare this to the Scottish Transport Plan whose vision is simply: *"We will have a sustainable, inclusive, safe and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors."*

Proposed Policy Outcomes - are these prioritised 1-9 or just nine outcomes? From a Swale perspective, a suggested priority order would be:

1. 1
2. 2
3. 9
4. 8
5. 7
6. 3
7. 4
8. 6
9. 5

Introduction
- Figure 3 – Where's the Active Travel England funding? It may be the smallest source but starting in 2020 it's probably contributed £10m+.
- Para 6 – "noise & disturbance" gets a mention in relation to fictional future airport proposals, but this is the only time noise pollution appears in the LTP and yet it is one of the major contributors to poor mental health.

What does a local plan do?
- Figure 4 – National Policies etc – Should 'GBR: Williams-Shapps Plan for Rail' be included?
- Figure 4 – County Policies etc – where's the KCWIP? Kent Rail Strategy? North & East Kent Connectivity Study 2023? They all need to be referenced.

Delivering our strategy
- P19 we will… accelerate and prioritise local road improvement schemes to tackle congestion and air pollution… AND enable active travel?
- P19 we will… incentivise people to choose alternative options to the car… add rail?
- P19 we will… strengthen our position and levers in regard to strategic transport links in the county… what about the rest of the rail network?
- P19 we will… our third priority in Framing Kent's Future concerning achieving an Environmental Step Change. There appears to be no ambition to reduce

the volume of private car mileage or speeds – the largest contributor to transport sector carbon emissions.
- P20 We will turn the curve on transport emissions and road pollution by developing approaches to road space etc… Again, there is no ambition to reduce the volume of private car mileage or speeds – the largest contributor to transport sector carbon emissions.

Challenge 1
- Our highways are in a phase of managed decline… Therefore
  - reduce traffic volume (traffic volume does not equal prosperity)
  - reduce access to inappropriate rural lanes
  - reduce speed limits
  - base parking fees, tolls and fines etc on weight, so those with the heaviest vehicles pay more

Challenge 2
- What analysis is there are killed or seriously injured (KSI)? Are most of the KSI's now external victims rather than drivers and passengers?

Challenge 3
- Traffic is causing congestion… Therefore
  - Reduce traffic volume
  - reduce access to inappropriate rural lanes
  - reduce speed limits
- Correction: "More vehicles, even if some are zero emission vehicles, **do** adversely affect the quality of life…"
- Correction: "Noise and air pollution ~~particularly~~ affects those communities living close to or along ~~busy~~ **through** roads"

Challenge 4
  - "as well as traffic generated by new developments being built" – developments cannot generate a net increase in traffic, that is not sustainable.

Challenge 5
  - Correction: "~~Some~~ indicators of public health, including obesity and life expectancy, have been worsening
  - The reality of this statement is that for the last 50 years we have been increasingly reliant on private cars and designed our world around them. Now we realise that using cars is bad for us, mentally and physically. Could this challenge be clearer and more assertive? Stop driving. We need to stop building infrastructure that relies on driving. The health indicators are really worrying for children as they are not only facing obesity, but respiratory issues due to being in cars that are sucking in pollutants. This is a crisis – can we get that message across?

Challenge 6
  - "The financial viability of the public transport service has declined." Does this mean that the financial viability of bus services has declined? The renationalised rail service is looking pretty healthy, if not back to pre-pandemic levels, despite the move away from daily commutes to London.

Challenge 7
- o Wording may be more effective if it was more positively framed.

Challenge 9
- o In short, there is no secure future funding.
- o A whole page of the financial challenge. Is this whinging not a bit much considering on p16 it says "that the Government does not require that the plan be constrained by our current budgets"? Therefore the LTP should be budget agnostic?

Turning the Curve
- o None of this is good news. The title is misleading – the curve is not turning in the right direction quick enough. It will be interesting to see the actions to tackle the upwards pressure on the emissions curve.

Policy Outcome 1
- o "…we have identified priority road corridors known as our Resilient Road Network" aren't these all National Highways roads?
- o Figure 14 – Resilient Road Network stops on the A249 south of the Sheppey Bridge. Should this not continue to the port at Sheerness?
- o Policy Objective 1A – "Achieve the funding necessary to deliver a sustained fall in the value of the backlog of maintenance work…" Can this not include "betterment" rather than just maintenance? It's far more cost efficient to maintain and improve at the same time rather than just maintain.
- o Should not the outcome for urban communities include the enabling of active travel?
- o The Outcome for rural communities appears to be a cut and paste error?

Policy Outcome 2
- o No mention of pedestrians, the most vulnerable road users.
- o Policy Objective 2A: Why fiddle with the wording? The phrase is KSI, Killed or Seriously Injured, not "Killed or very seriously (life-changing) injured". Every road traffic injury is life changing for the victim and their family in some way.
- o Can this not got further? Can we not eradicate fear from our urban and rural road network?

Policy Outcome 3
- o There appears to be no ambition to alleviate the pressure on Dover by increasing freight and private traffic to other ports such as Folkestone, Sheerness and Ramsgate?
- o There is no mention of the provision of better truck stop facilities across the network. Which could be a way that Kent prospers from this through traffic.

Policy Outcome 4
- o Is it appropriate to have this outcome and objective if there is no other reference to rail? Whilst it would be nice to have Ebbsfleet and Ashford international links open again, is there any evidence that they would benefit the county? Especially now that we no longer have a frictionless border.

Policy Outcome 5
- o Policy Objective 5A: Moving Traffic Enforcement has a far broader potential than just keeping parked cars from blocking Fastrack buses (only the second service is being set up in Dover after 17 years). Does this mean that more resources would be made available to establish a wider network of ANPR cameras? If so, this would allow the implementation of more traffic management such as Access Only TROs, which would surely have a far greater impact than a couple of Fastrack services?
- o Policy Objective 5B: Fastrack bus network is great but a very expensive way to run a bus service. The budget to establish the Dover Fastrack service is £33,820,000. Is this really value for money?
- o Policy Objective 5C: This is the only mention of MaaS (mobility as a service) and yet this could have the greatest impact on mode shift (a phrase erroneously missing from the LTP). Why is this only a "trial"? MaaS has already proved to be effective across the UK and even in Swale. Why is the wording for rural communities just piffle? The utilisation of MaaS such as Peer-to-Peer car sharing, Liftshare, Car Clubs and ebike hire could have a massively positive impact on rural communities, mitigating the impact of transport poverty and rural isolation.

Policy Outcome 6
- Access to Kent's attractions and historical and natural assets should increasingly be through modes other than driving; both to protect these assets and to widen social accessibility. Whilst the London audience is obviously important, the local regional should be a priority.
- Policy Objective 6A: vaguely says this but could be far stronger.

Policy Outcome 7
- There appears to be some confusion here between emission and air quality. They are not the same thing. Whilst decarbonisation eradicates exhaust and evaporation emissions, it does not improve friction particulate matter and in fact evidence suggests that EVs increase the most damaging PM1 and PM2.5.
- As well as businesses electrifying fleets, which is difficult, consolidation of journeys and deliveries should be enabled, reducing the volume of vehicle movements.
- As fleets electrify we should be building commercial fast charge facilities across the county at key points.
- A significant source of noise and air pollution (and highways degradation) in our towns is the vast fleet of home delivery vans. As part of the LTP5 every town should have a parcel consolidation centre enabling carriers to deliver to one location, generally using the strategic road network, and then small EVs and cargo ebikes making the individual home deliveries.
- Objective 7A: EVs are not the answer to the declining highways network, to pollution nor to congestion or safety. And it would be nice to make it absolutely crystal clear in this objective, that EV charging infrastructure will not litter the pavements.

- Objective 7B: Swale has a disproportionate number of traffic related AQMAs – six in Swale of the 29 in Kent. Our attempt to create an A2 Clean Air Zone was rejected by KCC. What support are you going to provide to the Districts?
- Objective 7C: Is this really an objective?
- The answer to lower harmful emissions, lower pollution and quieter streets is lower traffic volumes at lower speeds. EVs are only a partial answer and one that will probably not significantly impact the road network and residents until the late 2030s.

Policy Outcome 8
- A "public transport system" is buses and trains, but the policy is focused just on buses, which KCC has no more control over than trains. The privatised bus model does not work outside metropolitan areas as is evidenced by the decline of our bus services in Kent. And this is despite substantial KCC subsidies to operators.
- A public transport system should be buses and trains working together.
- Can you build a public transport system that will achieve mode shift and reinvigorate both bus and rail as well enable affordable attractive trips in Kent?
- Policy Objectives 8A & B: Since most trips on our road network are not to London, can you refocus your public transport system from being London centric and more regional? Stations are mentioned briefly, but these are great assets, they can be the focus for communities and also transport hubs. Could you think about stations less as gateways and more as community assets?

Policy Outcome 9
- Active travel and aviation appear to have been mixed up/merged?
- We have increasingly good access to Gatwick, Stansted and Heathrow – do we really need new airports in Kent?
- Is this the place to set out the health benefits of active travel? The benefits of walking and cycling (and public transport) for a Highways based LTP, is that it reduces congestion and the degradation of the declining asset. It makes space for the traffic that needs to be there – like the commercial traffic. It increases the equity of the plan if you enable more people to move under their own steam. If you build the active travel infrastructure well, environments become enabling rather than disabling.
- Objective 9A: The wording could be stronger, similar to 1A. i.e. We will achieve the funding necessary to deliver the infrastructure improvements articulated in the KCWIP and LCWIPs.
- The policy objective 9A of "prioritised locations in Kent to deliver increased levels of activity towards the Active Travel England target " is far too weak : "prioritised" too easily could be interpreted as a handful , while moving towards a target can allow for a minimal amount of movement .
- If local examples are needed, could we reference the Faversham Parishes to town project, and the Faversham LCWIP.

Glossary

- "Infrastructure first" is used a lot in the document, but there is no definition in the glossary.

A report on the LTP5 is being taken to Swale's Planning and Transportation Policy Working Group Meeting on 19th September (after the consultation closes) and we would like the opportunity to submit any further commentary agreed by members at that meeting for consideration alongside Swale's substantive response.