

Appendix A

Low Emission Strategy; Draft Consultation Themes

1. TRANSPORT EMISSIONS

- 1.1 Since transport is the main cause of the pollution affecting Maidstone Borough, the Transport section of the Low Emission Strategy will be the most important. This section will complement other Council Policies such as the Local Transport Plan and the Air Quality Action Plan but whereas these Policies attempt to deal with the problem by reducing congestion and encouraging so called modal shift, i.e. reducing the use of private cars by encouraging increased use of public transport, walking and cycling, the Low Emission Strategy attempts to tackle the vehicle emissions themselves.

2. Public Transport; Buses

- 2.1 The latest UK road-traffic emission factors show that buses are significantly higher emitters of NO_x than cars, LGVs and even HGVs. The level of emissions is mainly dependent upon the emission technology (Euro classes). The bus fleet in Maidstone contains a proportion of the older Euro I, Euro II and Euro III, and MBC should investigate ways to improve the composition of the bus fleet in the Borough.
- 2.2 Increasingly, Local Authorities are introducing Emissions Standards for the bus fleets within their Boroughs. One consequence of this is that, as bus fleet operators use their newer, cleaner buses in areas where emissions standards have been introduced, they shift their older more polluting buses to the areas where no standards apply.

3. Taxis

- 3.1 Whilst Taxis are far less significant polluters than buses, MBC should still be forward thinking and encouraging the shift towards low and ultra-low emission vehicles. The present Taxi Licensing Policy sets a vehicle age standard, however, a standard based on vehicle emissions, coupled with measures to encourage the use of hybrid and electric vehicles as taxis would represent a significant improvement.

4. Freight Emission Strategy

- 4.1 The council should enter into dialogue with freight owners to find ways to improve the emissions of the HGV and LGV fleets using the Borough's road network. One of the simplest ways of doing this is by changing driver behaviour

(so called eco-driving) and there are a number of commercially available driver aids designed to assist with this.

- 4.2 One such device is called Lightfoot, which consists of a simple display which shows the driver when the engine speed is in the most economical range. Lightfoot has been independently tested at Bath University, and was shown to reduce fuel consumption by approximately 10% whilst reducing CO₂ emissions by 10%, NO_x emissions by 20%, and particulate emissions by 15%. Lightfoot has been adopted by a number of Local Authorities, as well as many commercial vehicle fleets including Royal Mail and Autoglass. It has also been shown to bring about a reduction in accident rates. MBC's own vehicle fleet currently uses some 130,000 litres of fuel annually, thus a device with the potential to reduce this by 10% appears to be worthy of further consideration.
- 4.3 Fleet Recognition Schemes, are schemes which encourage fleet operators to improve the performance and efficiency of their fleets, and offer some system of recognition for the improvements achieved. The two main schemes are ECOstars, which would be implemented and paid for by the council, and is free to fleet operators, and FORS (Fleet Operator Recognition Scheme) which individual fleet operators pay to join. The disadvantage of ECOstars is that is quite expensive for the Council, DEFRA grant funding is no longer available, as it once was, and the precise benefits are unclear at present.

5 Promoting Low Emission Vehicles & Infrastructure

- 5.1 Compressed natural gas (CNG), a form of methane, is a relatively clean fuel which can be used in place of petrol, diesel, and LPG. It produces lower emissions of NO_x, carbon dioxide, carbon monoxide, particulates, and un-burnt hydrocarbons than other fuels. At present, there is no CNG refuelling infrastructure in Kent, which is a major obstacle to uptake, as it means that any fleet operator wishing to switch to CNG will need to travel to London or Essex to refuel. There is anecdotal evidence that some fleet operators would like to switch to CNG, and there is further anecdotal evidence that supplier will install the infrastructure free of charge if sufficient demand can be identified. Some grant funding is still available for electric vehicle charging points.

6 PUBLIC HEALTH

- 6.1 Public Health is one of the key drivers behind the Low Emission Strategy. Air pollution is known to exacerbate asthma and allergies, and disproportionately affects the young, the elderly and those with pre-existing respiratory conditions such as bronchitis and Chronic Obstructive Pulmonary Disease (COPD). It also causes increased rates of hospital admission and premature deaths. Diesel fumes are now known to be carcinogenic.

7 CARBON MANAGEMENT

- 7.1 MBC produced a Carbon Management Plan, with the aim of reducing CO₂ emissions from its activities by 20% from the 2008-09 baseline by 2015. This equates to 5,295 tonnes CO₂ with a cumulative value of £1.6 million. The baseline emissions for transport (fleet and business travel) is 2,024 tonnes. The Carbon Management Plan comprises some 44 actions and projects, some straightforward, and some aspirational, by which the target should be met.
- 7.2 The Plan is currently being reviewed and updated, and figures will shortly be available to show whether or not the desired reduction has been achieved, however, most of the actions have already been completed.
- 7.3 The new Plan will be incorporated into the Low Emission Strategy, and will no longer be a stand alone document.

8 PLANNING & DEVELOPMENT CONTROL

- 8.1 Effective planning policies can play a significant role in helping sustain air quality improvements by both discouraging the use of high emission vehicles (paragraph 39) and supporting the uptake of low emission vehicles, including the provision of low emission vehicle refuelling facilities, such as EV charging points (paragraph 35).
 - 8.2 Recently published National Planning Practice Guidance (NPPG)¹ states that mitigation may include the contribution of “funding to measures, including those identified in **air quality action plans** and **low emission strategies**, designed to offset the impact on air quality arising from new development”. While air quality is only one of many considerations that are relevant to planning, the NPPG states that where sustained compliance with EU Limit Values is prevented, a local authority is to “consider whether planning permission should be refused”.
 - 8.3 It is increasingly recognised that developers should be required to use mitigation measures to offset the environmental damage caused by their new developments. A number of Local Authorities have developed Supplementary Planning Guidance which includes the integration of mitigation measures into scheme design as standard and uses a damage cost approach to inform the scale of mitigation required for major schemes. This approach should work very well in Maidstone Borough.
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9 PROCUREMENT

9.1 The purchasing power of the public sector is significant in Maidstone and Kent. Recent legislation and guidance encourages the public sector to support the uptake and deployment of low emission vehicles through sustainable procurement decisions. The Maidstone LES development provides an opportunity to review sustainable procurement practices in both the Borough and County and identify specific principles and measures that could benefit both air quality and carbon reduction targets. The review provides an opportunity to look at 3 areas of procurement that could help reduce vehicle emissions:

9.2 Contracts relating to goods and services provided to the Council

- 9.2.1 Public sector organisations are required to look at best value, rather than lowest cost, when making procurement decisions. The **Public Services (Social Value) Act 2012** came into force on the 31st January 2013. The Act, for the first time, places a duty on public bodies to consider social value, including environmental considerations, ahead of a procurement exercise.
- 9.2.2 Local sourcing is practised widely by local authorities, whereby local suppliers are encouraged to bid for council contracts. Such initiatives have the potential to support the local economy while helping reduce overall mileage. Local sourcing offers the potential for lighter goods/low emission vehicles to be used in delivery. Helping local suppliers develop emission strategies can provide competitive advantage in procurement decisions.

9.3 Procurement of vehicles by the Council

- 9.3.1 The **Cleaner Road Transport Vehicles Regulations 2011** bring into force the requirements of the **EU Clean Vehicles Directive 2009** and require public sector organisations to consider the energy use and environmental impact of vehicles they buy or lease. A key concept of the Regulations is the consideration of **whole life costs** whereby the operational costs over a vehicle life, including pollution damage costs, are taken into account rather than just the purchase price. This helps to redress the issue of low emission vehicles costing more than conventional vehicles, while potentially having lower operating costs that outweigh the purchase increment.

9.4 Partnerships

- 9.4.1 The Council should examine the increased potential for purchase cost savings when buying low emission vehicles and deploying low emission vehicle infrastructure through innovative partnerships with both public sector organisations and the private sector.

10 NON-TRANSPORT EMISSIONS

- 10.1 Whilst transport emissions are the major source of pollution in the Borough, non transport emissions contribute a significant percentage of background emissions. Examples of non transport emission sources include residential and commercial buildings, combined heat and power plants, and construction sites.

11. ECONOMIC DEVELOPMENT

- 11.1 The LES also aims to provide a platform for inward investment, not only in terms of accessing funding, but through the encouragement of the low emission vehicle supply chain and ancillary services to locate in the borough
- 11.2 The LES will build on the Maidstone Economic Development Strategy, whose stated aim is “a model 21st century town , a distinctive place, known for its blend of sustainable rural and urban living, excellence in public services, dynamic service sector-based economy, and above all, quality of life.”
- 11.3 The LES will also compliment the Sustainable Community Strategy for Maidstone 2009-2020 and the work of the Local Strategic Partnership

12. ADDITIONAL ACTIONS

- 12.1 There are six air quality hotspots within the Borough. Having identified these hotspots, rather than declare six individual Air Quality Management Areas (AQMA), a single AQMA was declared, covering the entire urban area of the Borough. There were very good reasons for doing this, for example, administering 6 individual AQMAs are significantly more onerous than administering a single AQMA. However, it does give rise to potential anomalies, since the single AQMA includes many properties where we know the air quality to be perfectly acceptable. This can cause difficulties, for example, when dealing with planning applications, where applying measures designed to tackle poor air quality, is hard to justify at some locations. The boundaries of the AQMA will therefore need to be kept under review as the LES is implemented,