

# Low Emissions Strategy Consultation Summary

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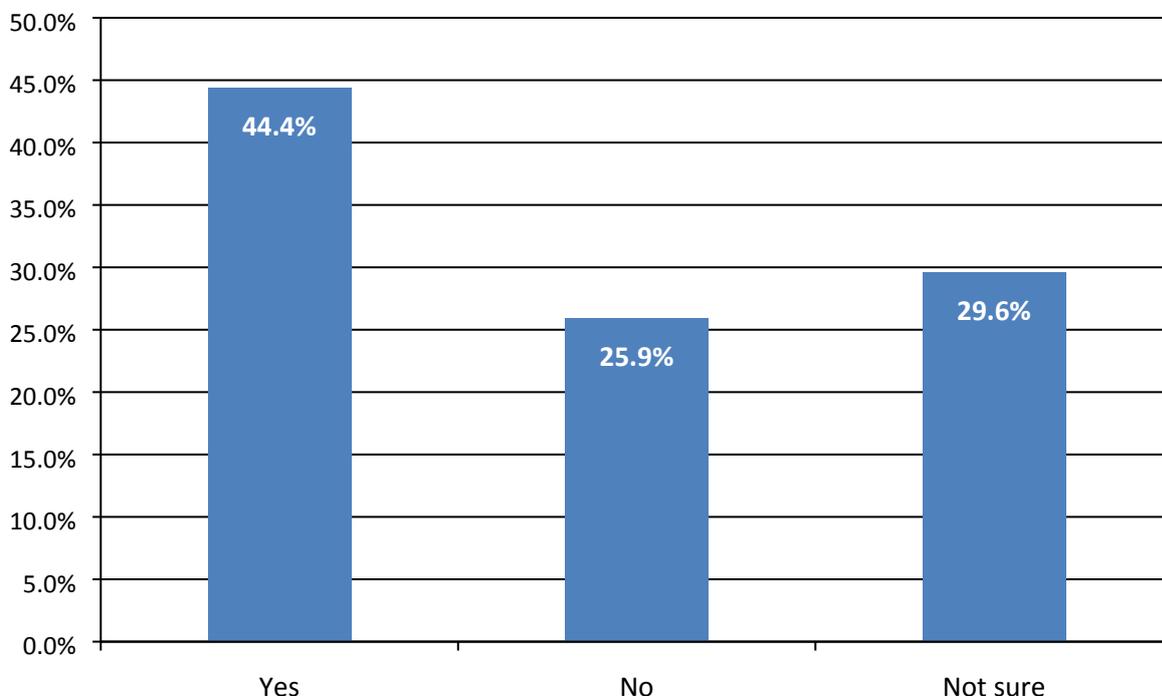
The Council undertook to consult on a draft Low Emissions Strategy and changes to our Air Quality Management Area. Consultation was via an online survey and two focus groups with residents.

The survey was open for 8 weeks and 57 people responded. Two focus groups were held for residents and 15 people attended. The survey went out to a random sample of the consultation mailing list directly and was promoted online through the Council's social media.

**This report summarises the responses to the online survey. All suggestions received as part of the survey along with the suggestions from the focus groups have been passed the Environmental Health team to respond to.**

## Strategy Aims

**Do you think that the aims of the strategy are relevant and appropriate to reducing emissions in the borough?**



*Responses: 54*

There were 54 responses to this question. Overall, 44.4% of respondents said they thought the aims of the Low Emissions Strategy were relevant and appropriate. However, just under a third were not sure.

Those which answered no were asked what they would change about the strategy, 24 comments were received which could be categorised (comments that are unable to be categorised include things like 'see previous comments', n/a, incomplete words and comments where the meaning/intention cannot be deciphered).

Seven comments were negative, one said the strategy should have been published sooner, one saying that emission targets should be set nationally and another saying that this type of works should be co-ordinated with neighbouring authorities. One felt that the changes to the Gyrotory system actually encouraged the use of cars and expected the draft strategy to include a reference to gaining smart city status. The other two made comment on the housing developments, one of these was also critical that the strategy did not mention monitoring of air pollution, felt that the action on low emission standard for buses was meaningless and the locations of existing EV points in the borough was misleading. The last commenter was critical of the proposed actions in regard to the crematorium.

There were 18 neutral comments, of these 12 comments discussed an element of transport. Transport aspects that were mentioned included putting in measures for only electric trains to service Maidstone, that there are no measures in relation to the M20, improving public transport through the introduction of

electronic hopper buses and a greater emphasis on walking and cycling. Two people said that electric vehicles would not solve the problems of air pollution.

There were two comments in relation to development within the borough with the feelings that there is too much development and it is too densely packed. There were also four comments classed at 'other'. These people said that the actions are too vague, that the strategy lacks imagination and it is not robust enough.

### **Is there anything missing from the strategy aims that you feel should be included?**

When asked what they felt was missing from the strategy 34 made comments that could be categorised.

Ten comments related to planning, all but two of these were about the amount of additional housing that is being built in the borough. The main concern was that building more houses will lead to more cars and more congestion.

The remaining comments relating to planning were about the use of solar energy for new developments; this person was disappointed that this didn't seem to appear in the strategy. The other comment said that Environmental Impact Assessments should be done at the outline stage of the planning application process.

There were ten comments that related to transport (one of these was repeated from the previous question), of these, half mention encouraging walking or cycling. One was critical of school uniform polices when children are required to wear ties and blazers in summer and are not allowed coats in winter which discourages walking and cycling. Another was pleased with the work done to the towpath but was disappointed that cycle lanes are not joined up in places.

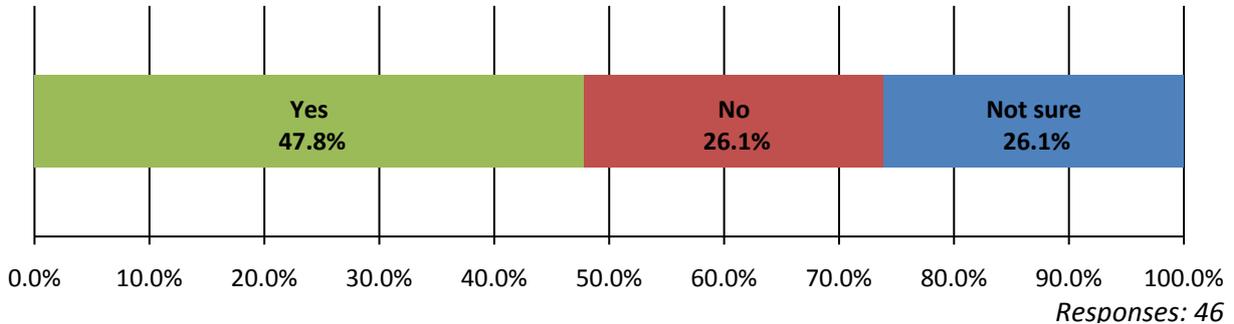
Of the remaining comments around transport, one was regarding the lack of buses, another that buses should not be allowed to wait with their engines idling, another gave a list of things they felt was missing from the strategy including significant tree planting, lobbying for a diesel scrappage scheme, 20mph speed limits and introduction of a congestion charge and the last raised the introduction of electric trains.

There were 14 further comments that have been classed as other. Three of these were about terminology or references within the strategy, querying the AQMA map, the data and acronyms.

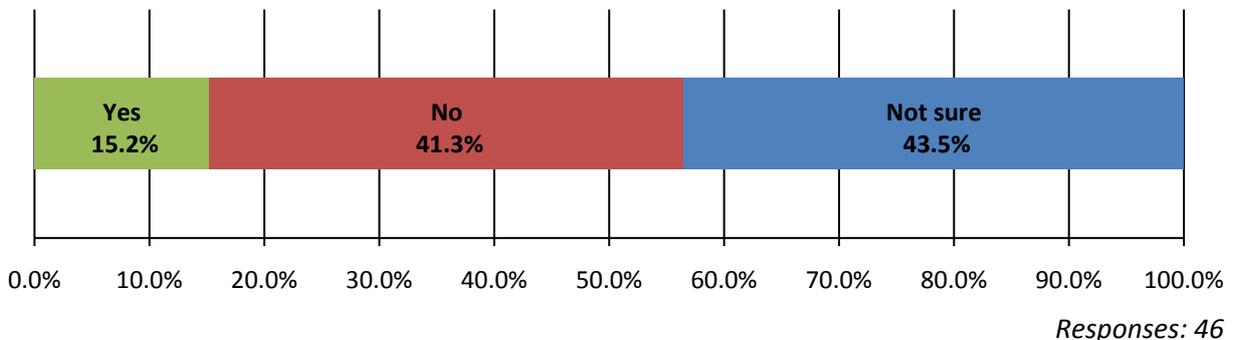
One commenter was particularly concerned about air pollution in Bearsted, due to its proximity to the motorway.

## Transport

Do you think that the actions related to transport are relevant and appropriate to reducing emissions in the borough?



Do you think the actions in this section are capable of achieving the desired impact?



### If no, why not?

There were 28 comments received in relation to the actions for Transport.

The most common theme was that the actions in the plan do not go far enough, that they are not ambitious and that a tougher stance could be taken on enforcement. There were nine comments that were classified this way with several making suggestions where MBC could go further including addressing diffuse sources of air pollution such as agriculture and enforcement action for idling vehicles outside hospitals and schools. There were also two commenters who said that the plan was not detailed enough and had concerns about the commitment from partner organisations that is required to deliver the strategy.

*“Need to be much more imaginative and tougher to get freight off road and onto rail and reduce the number of vehicles on the road. Punitive enforcement and smart distribution”*

There were three responders who raised concerns about MBC’s ability to deliver the strategy and its action plan, one of these queried how MBC will be able to impose air improvement actions with the belief that developers in the borough have previously avoided S106 actions after ‘time ran out’. There were also two that were concerned about the impact of the local plan and the amount of housebuilding in the borough will have on the strategy.

There were two who were concerned that in some areas the strategy does not seek to reduce air pollution but shift it to another area, this approach was not viewed favourably.

Two people had political concerns, firstly that there is limited support to reduce car use in the borough and secondly ensuring that all the relevant stakeholders are engaged.

There were also four other comments, of these one was positive saying that new vehicle technology will improve things, one was negative expecting air pollution to get worse, particularly in the south of the borough due to new homes being built. Another made comments regarding buses saying bus operators should not be allowed to move older buses to areas where standards are not yet set. The last general comment said that more thought needs to be put into the infrastructure and that until issues regarding public transport in rural areas are addressed the strategy will not work.

#### **Which action in this section do you think will have the greatest impact on emissions?**

There were 33 comment seven of these said they didn't think any of the actions in the section on transport would have an impact on air quality in the borough.

Ten mentioned the changes to public transport namely low emission standard for buses and commercial vehicles would have the greatest impact and six said they though the actions around electric vehicles would have the most impact both the changing of the Maidstone fleet and introducing more charging points in the borough were mentioned. While two said the actions around reducing private car use would have the most impact, one said that reducing idling vehicles would.

One said that stopping lorries going into the town centre and another said traffic flow. One commenter said bypass and another said mass development but neither provided further context.

#### **Which action in this section do you think will have the least impact on emissions?**

There were 23 comments submitted; six comments that were positive saying that all or most of the actions would have an impact.

There were three responses which mentioned parking in the high street, two of these said this action would have the least impact and one was concerned about the impact this could have economically for the town centre. Two commented on the changes to the fleet vehicles, two said the driver training and two said the bike storage would have the least impact.

*"Planning - as we saw with Linton, Redwall Lane industrial site, other policies can easily outweigh concerns over air pollution"*

There were eight other comments that which could not be grouped, the actions that were raised in these comments as having the least impact were; raising public awareness, working with schools, travel plans, low emission taxis, planning and the crematorium. One said they felt that the strategy and action plan put too much emphasis on electric and hybrid vehicles.

#### **Are there any additional actions that you think the council should be undertaking in this area?**

There were 27 comments about what they feel is missing from the strategy, of which two said there was no additional actions they though the Council should be taking in this area.

Three mentioned relief roads with one mentioning Leeds/Langley and another mentioning Leeds and the South of the borough.

There were four comments that related to public transport; encouraging use, improving the timetables and ensuring there are services to serve children traveling to outlying schools.

Four comments related to personal vehicles and bikes; vehicle idling and greater enforcement around it, reduced parking charges for electric and hybrid vehicles, and that the council should do more around cycling.

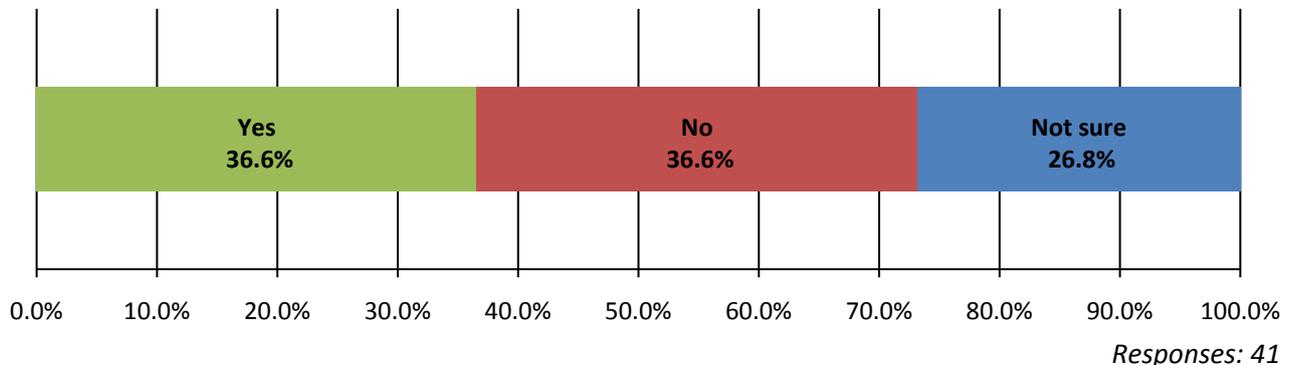
There were seven comments in relation to planning and enforcement; two said there should be more enforcement through bylaws and planning policy; one said all major residential development should have an environmental impact assessment and another said planning permission should not be granted for retail outlets outside of the town centre. There were two comments that mentioned the need to get a commitment from transport providers and KCC and one who said it was important that the significance of the strategy is disseminated to Planning Committee.

Two respondents said we should be looking at best practice both from elsewhere in the UK and worldwide. There was a suggestion from two participants that we should bring back the lost park and ride services and one said there should be a new site in the South of the borough.

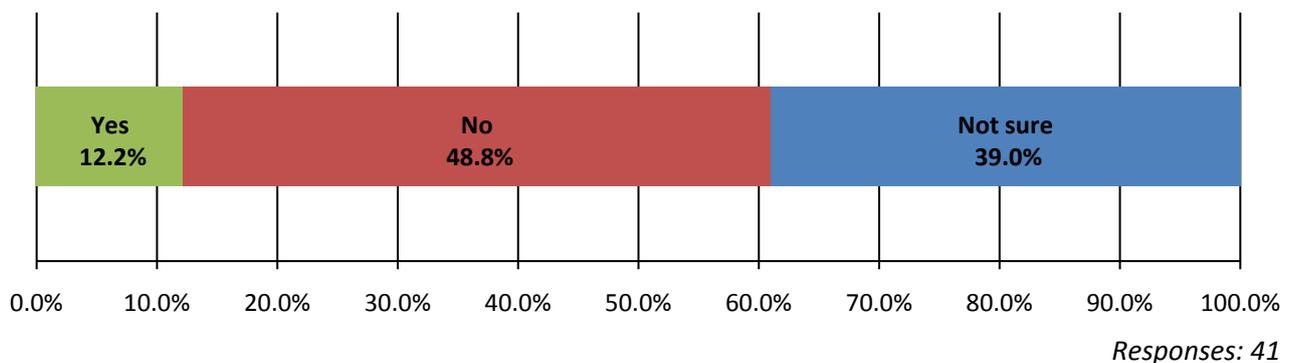
There were also two other comments, one of which was about ensuring that there is regular monitoring of air quality and the other saying that the council should be lobbying central government to make some national restrictions about town centre traffic.

## Planning & Property

Do you think that the actions related to planning and property are relevant and appropriate to reducing emissions in the borough?



Do you think the actions in this section are capable of achieving the desired impact?



### If no, why not?

There were 20 comments received in relation to why the actions on planning and property in the Local Emissions Strategy will not have the desired impact.

Six respondents were not positive about the Council's approach. Two said the actions in this section will have little or no impact, and four people said the actions do not go far enough or are weak. Of these one of these commenters said that the actions shouldn't just apply to MBC owned and maintained buildings but to all building with planning department regulating and enforcing breaches.

*"Recent planning decisions have shown low priority for this issue in favour of other priorities (jobs, housing, etc). The impact on air quality is not considered"*

Six comments reference the planning process; one said that recent decisions do not demonstrate any regard for air quality. The other comments on this theme said that more could be done as far as policy was concerned, with one suggesting near zero emission targets for new heating systems and the use of solar energy. One comment expressed concern there were too many new houses whilst another was suspicious that lobbyists for developers are trying to make the planning application process easier, at the expense of the environment.

Two comments regarded that it seem to them there were more mitigation measure than reduction measures.

One respondent was concerned that there are no timescales in the document; it should be noted that the action plan does contain timescales however they are not specific dates.

There were four other comments of which one said the plan was out of date, another said planning and property do not have the ability to change society and another said it doesn't matter if you build eco houses they will still mean more cars on the road.

#### **Which action in this section do you think will have the greatest impact on emissions?**

There were 20 comments in this section, seven responses that they didn't think any of the actions would have an impact or they didn't know what impact the actions would have on emission. Of these two also commented that they felt the actions were too vague.

There were six comments that related to planning, three of these didn't expand on their comments just say better management of development and more influence on development. The remaining commenters were positive about the restriction of parking on new developments and EV charging points for new developments.

There were five other comments which were varied; reducing emissions from boilers, turning engines off (idling reduction), reusable energy, buffer zones and reducing emissions from HGVs/LGV using the borough's roads.

There was one last statement that was submitted which said that livestock is the cause of more emissions than vehicles.

#### **Which action in this section do you think will have the least impact on emissions?**

There were eighteen comments submitted regarding actions that would have the least impact on emissions.

However, seven were so brief it was impossible to identify whether the responders felt all of the actions will have an impact or if all of the actions have a low impact. There was a further comment where intent could not be ascertained which simply said 'increased traffic'. There was also one person who responded not sure and another person said that two of the actions in this section were basically the same.

There were four comments that related to planning, one of these was a repeated comment (more development equals more cars and therefore more emissions), another said they doubted any planning application will ever be refused on the grounds of air quality, while another said it was a bit late as most permissions for new housing developments have already been granted.

EV charge points, electric vehicles and boiler emissions for Council properties were all cited as making a difference to emissions in the short term.

#### **Are there any additional actions that you think the council should be undertaking in this area?**

There were sixteen comments submitted in this section, including two which said they did not have ideas for additional actions. Of the remaining 14 comments two mentioned relief roads and two said more should be done to expand the cycle network and get people cycling, two mentioned public transport with one of these

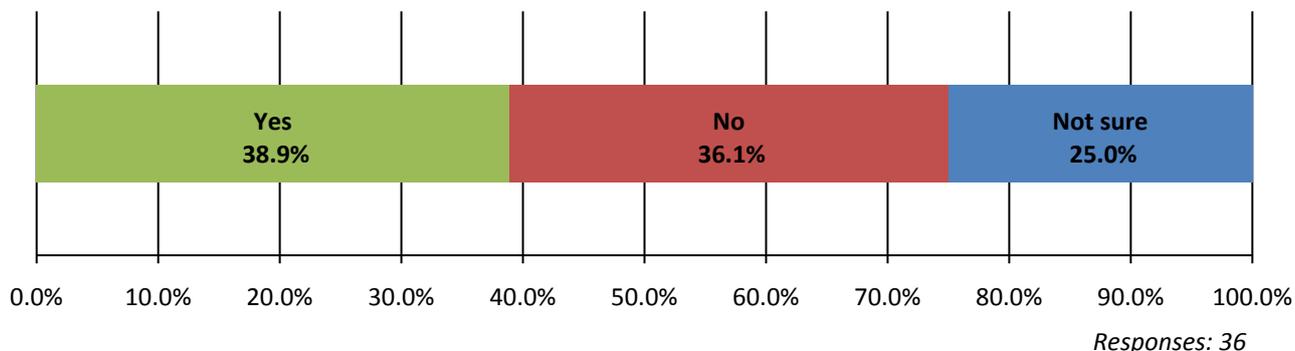
saying Park and Ride should be expanded and use electric buses and the other saying that the bus services need improving.

Planning issues were cited by three respondents including using CIL and the planning system to drive pedestrian friendly development and force cleaner business fleets and private transport. There were also two other comments both of which spoke of developments that are already underway and were critical about the amount of houses being built.

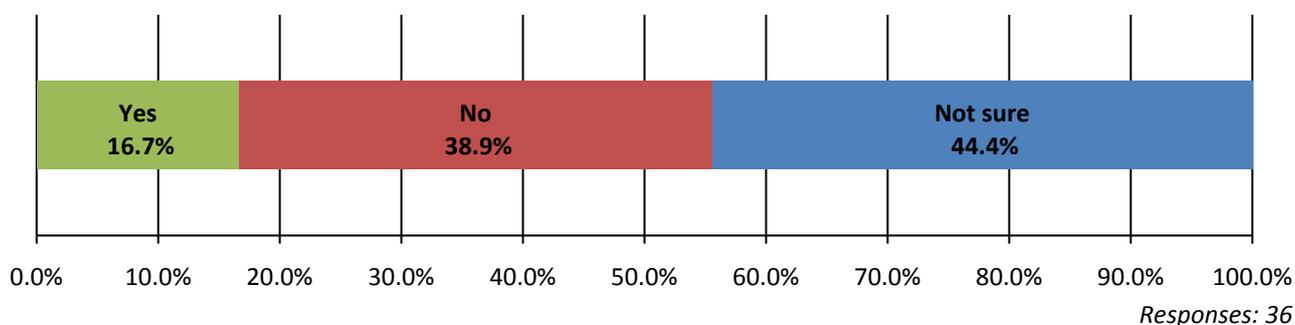
One person queried wood burning stove usage as a cause of emissions. There was a suggestion that AQMA should be expanded and one said that the Council are too hampered by central government.

## Procurement & Carbon Management

**Do you think that the actions related to procurement and carbon management are relevant and appropriate to reducing emissions in the borough?**



**Do you think the actions in this section are capable of achieving the desired impact?**



### If no, why not?

There were 12 respondents to this section;. A lot of responses for a variety of reasons felt the impact would be small; the actions are too vague; the actions are centred on Council activities and to make a difference there need to be a commitment from partners; concerns about how we were going to practically tackle the Councils suppliers; concerns about achieving value for money and the possible impacts on budgets; carbon management was only a part of air quality and does not cover NOX; amount of emissions arising from the MBC fleet: they thought this would be tiny compared to overall traffic in the borough.

One commenter provided a list of suggestions including returning the weekend freighter to reduce multiple trips to the tip and ergonomically designing services like reducing open spaces mowing and converting green spaces to meadows and woodlands,

### Which action in this section do you think will have the greatest impact on emissions?

There were fourteen comments of these Four responded none and two said they were not sure.

The suggestions for greatest impact were; one respondent suggested the crematorium; two suggested procurement, namely the review of the strategy and the using of local providers for goods and products. Three transport related comments: one said electric vehicles, another said the vehicle procurement namely changing the fleet would have the greatest impact and one person said improved emissions from HGVs and LGVs.

### Which action in this section do you think will have the least impact on emissions?

There were 14 comments received in response to this question. Three responded all, one responded none and one responded not sure.

There were five comments relating to the replacement of council pool cars, one commenter said this was premature and another queried how cost effective this was.

One person said the EV charging points would have the least impact, another said the heat recovery from the crematorium and another said bicycle parking.

There was one other comment where the respondent said there are no timescales for introducing these aims.

### Are there any additional actions that you think the council should be undertaking in this area?

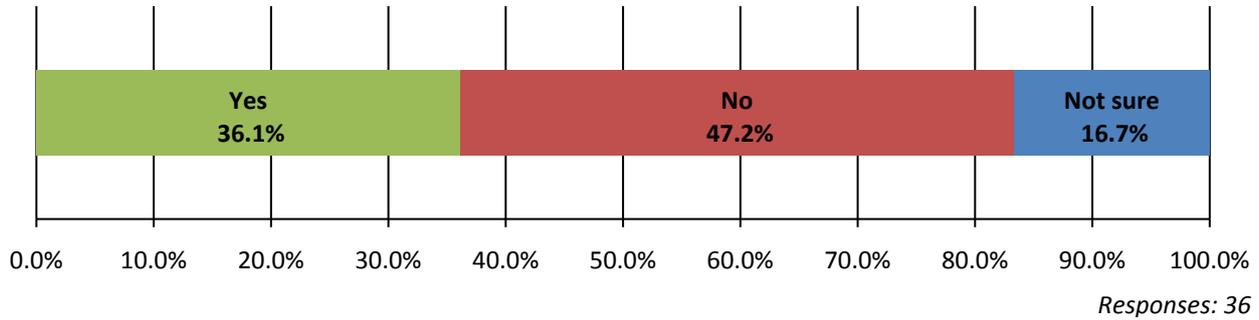
There were 13 comments submitted, of which four said they didn't have any further ideas. One person commented that this is an area where the Council had little control and another commented that there are no actions relating to congestion.

Of the remaining comments all contained on or more suggestions including banning diesel vehicles from the town centre, undertaking additional street sweeping in summer and a commitment to reduce business mileage year on year.

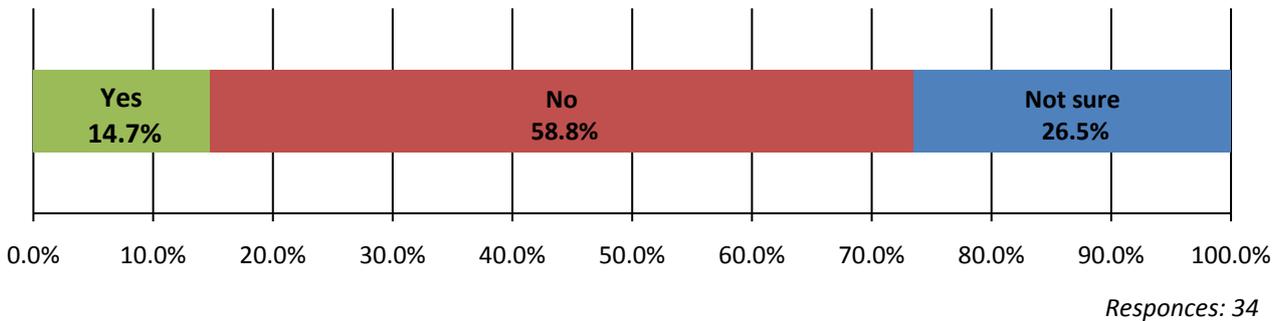
*"Congestion - the main roads in the town and surrounding areas of the borough are extremely busy at all times, congestion cannot be ignored and, therefore, the roads must be improved otherwise this scheme has no chance of succeeding."*

## Public Health

Do you think that the actions related to public health are relevant and appropriate to reducing emissions in the borough?



Do you think the actions in this section are capable of achieving the desired impact?



### If no, why not?

There were 16 comments received in this section. One respondent was not sure whilst two did not think the actions went far enough or had substance. One respondent felt raising awareness was more important and another felt it does nothing to tackle the source of the pollution.

*"While public health naturally forms part of an integrated strategy, it is mainly about awareness and education without tackling the sources of pollution"*

Four respondents felt important information was missing; two suggested the strategy should include data on local mortality and impacts and without this, no targets for improvement can be set; one said that early death causes should be included; and one said the hospital was ignored.

There were four suggestions; look at the price of bicycle parking; to encourage use it should be cheaper than car parking; raise awareness, by mapping early deaths from air pollution; recognition schemes should have benefits for reaching the standard as an incentive and the inclusion of a bypass.

There was one positive comment that noted that reduction in emissions can help people with some illnesses.

There was also a query about how pollution levels can fall in densely populated areas.

### **Which action in this section do you think will have the greatest impact on emissions?**

There were ten comments received in this section, of which seven said they didn't think any of the actions in this section would have an impact on emissions. One commenter wasn't aware of a Health Living team or a Health Inequalities Action Plan.

There was a positive comment regarding the recognition scheme and another said that they thought the introduction of EV charge points would have the greatest impact but was concerned that it was only locally.

### **Which action in this section do you think will have the least impact on emissions?**

Eight people provided comments in response to this question. One respondent said none of the actions, and five said all.

One comment said they thought the initiatives to reduce staff travel would have the least impact and another commented that it will be easy to rely on the work of partners.

### **Are there any additional actions that you think the council should be undertaking in this area?**

There were twelve comments about what other actions the council should be undertaking in this area.

There were four suggestions that were transport related firstly that there could be a scheme around the hiring of electric vehicles and secondly park and ride subsidies for KCC, MBC and NHS workers; third suggestion was to discourage car use and try to reduce the amount of traffic going through the town and finally diesel vehicles should be banned and buses should be electric.

Other suggestions were; all major developments should have an environmental impact assessment; said bigger improvement should be considered overall; improve parks and green spaces and partnership working.

Two people made comments about data collection and monitoring one said monitoring should be improved and linked to health outcomes while the other said that data, included that collected by others, should be considered when monitoring the strategy.

There were two other comments that contained a number of suggestions, both of these mentioned effective monitoring and raising awareness particularly when safe levels are exceeded. One of these provided several suggestions around actions that could be taken in relation to residential buildings including looking at damp buildings (as these will require more energy to heat), emissions from boilers and enforcement by environmental health where there is poor internal air quality both in commercial and residential settings.

## **What do you think are the main challenges Maidstone faces in relation to air quality and emission levels?**

There were 34 comments received in response to this question.

There were four comments that queried the Council's willingness and commitment to reducing levels of emissions. Of these one stated that the challenges are self-inflicted due to the amount of development in the borough without supporting road infrastructure and another was positive about the AQMA but critical about the lack on monitoring. A second queried the availability data on pollution and health outcomes.

There were five comments in relation to development in the borough being a challenge, one said developers are taking advantage of relaxed building and planning regulations while another said development was pro-car and anti-pedestrian and cyclist. One made comment that there are no safe cycle routes linking each side of the river and another said the biggest challenge to Maidstone was the M20.

Three comments were received about the need to get buy-in from KCC, Councillors and other partners like transport providers. One said the biggest challenge was not being dynamic enough and another was concerned about response to the engagement on this issue being ignored.

Six respondents identified the amount and flow of traffic in the borough as the biggest challenge, one of these commenters also said it would be easier to ensure that all taxis and buses are either electric or hybrid than ban diesel vehicles.

Three respondents expressed concerned about how the proposals would be financed.

Two suggested biggest challenge would be people, saying they are not interested and are unlikely to change their habits.

There was a challenge to the guidance from central government suggesting that cars are not the problem, agriculture and one person said that Maidstone needs a bypass and that the lack of park and ride and increase in housing are the challenges.

## Survey Demographics

Gender		
Male	51.4%	19
Female	48.7%	18
Unspecified	0.0%	0
	<b>Answered</b>	<b>37</b>
	<b>Skipped</b>	<b>20</b>

Age		
18-24 years	5.4%	2
25-34 years	8.1%	3
35-44 years	5.4%	2
45-54 years	29.7%	11
55-64 years	29.7%	11
65-74 years	21.6%	8
75 years and over	0.0%	0
	<b>Answered</b>	<b>37</b>
	<b>Skipped</b>	<b>20</b>

Disability or Health Problem		
Yes	13.9%	5
No	80.6%	29
Prefer not to say	5.6%	2
	<b>Answered</b>	<b>36</b>
	<b>Skipped</b>	<b>21</b>

Ethnicity		
White/Northern Irish/British/Gypsy or Irish Traveller	85.3%	29
Asian/Asian British; Indian/Pakistani/Bangladeshi/Chinese	2.9%	1
Other (please specify)	11.8%	4
	<b>Answered</b>	<b>34</b>
	<b>Skipped</b>	<b>23</b>