

# AMENDED AGENDA

## COMMUNITIES, HOUSING AND ENVIRONMENT COMMITTEE MEETING



Date: Tuesday 16 February 2016

Time: 6.30 pm

Venue: Town Hall, High Street,  
Maidstone

Membership:

Councillors D Mortimer, Newton, Mrs Parvin,  
Perry, Mrs Ring (Chairman),  
Mrs Robertson, Webb, Webster and  
J.A. Wilson

---

Page No.

1. Apologies for Absence
2. Notification of Substitute Members
3. Urgent Items
4. Notification of Visiting Members
5. Disclosures by Members and Officers

**Continued Over/:**

---

**Issued on Tuesday 9 February 2016**

The reports included in Part I of this agenda can be made available in **alternative formats**. For further information about this service, or to arrange for special facilities to be provided at the meeting, **please contact Caroline Matthews on 01622 602743**. To find out more about the work of the Committee, please visit [www.maidstone.gov.uk](http://www.maidstone.gov.uk)

*Alison Broom*

**Alison Broom, Chief Executive, Maidstone Borough Council,  
Maidstone House, King Street, Maidstone Kent ME15 6JQ**

6. Disclosures of Lobbying
7. To consider whether any items should be taken in private because of the possible disclosure of exempt information.
8. Minutes of the Meeting Held on 19 January 2016
9. Presentation of Petitions (if any)
10. Questions and answer session for members of the public (if any)
11. Report of the Head of Environment and Public Realm - Mitigation for the Withdrawal of the Saturday Freighter Service
12. Report of the Head of Housing and Community Services - KCC Mobile Library Consultation
13. Report of the Head of Finance and Resources - Third Quarter Budget Monitoring
14. **Report of the Head of Housing and Community Services - Draft Low Emission Strategy Consultation Response.**

## COMMUNITIES, HOUSING & ENVIRONMENT COMMITTEE

16<sup>th</sup> February 2016

Is the final decision on the recommendations in this report to be made at this meeting?	<b>Yes</b>
---	------------

### Draft Low Emission Strategy Consultation Response

<b>Final Decision-Maker</b>	Communities, Housing & Environment Committee
<b>Lead Director or Head of Service</b>	John Littlemore Head of Housing & Community Services
<b>Lead Officer and Report Author</b>	Dr Stuart Maxwell
<b>Classification</b>	Non-exempt
<b>Wards affected</b>	All

**This report makes the following recommendations to the final decision-maker:**

1. The Committee adopts the Low Emission Strategy attached at Appendix B.
  
2. The Committee delegates to the Head of Housing & Community Services the authority to develop an action plan to deliver against the priorities in the Low Emission Strategy, save that any action that has no budget or is likely to be controversial is brought back to the Communities, Housing & Environment Committee for consideration.
  
3. That the Head of Housing & Community Services provides the Communities, Housing & Environment Committee with an annual update on actions taken to progress the themes outlined in the Low Emission Strategy.

**This report relates to the following corporate priorities:**

- Keeping Maidstone an attractive place for all – the Low Emission Strategy contributes towards providing a clean and safe environment that in turn will promote good health and well-being.

**Timetable**

<i>Meeting</i>	<i>Date</i>
Communities, Housing & Environment Committee	16 February 2016

# Low Emission Strategy

## 1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Maidstone Borough Council is developing a Low Emission Strategy. The themes of the Low Emission Strategy were agreed by the committee in June 2015 and went out to public consultation during November and December of 2015.
  - 1.2 The purpose of this report is to update members with regard to the responses received from the consultation and how they have been used to develop the Low Emission Strategy. A number of case studies are included in the strategy, to illustrate what has been done elsewhere, These are examples of the types of action which we will be exploring and developing.
- 

## 2. INTRODUCTION AND BACKGROUND

- 2.1 The Council is developing a Low Emission Strategy in response to high levels of air pollution in specific parts of the Town Centre and other areas of identified concern. The Low Emission Strategy is designed to complement the existing Air Quality Action Plan, by addressing vehicle and other emissions.
- 2.2 Eight themes were previously approved by the committee for the Low Emission Strategy, namely:-
  - 1) Transport Emissions
  - 2) Public Health
  - 3) Carbon Management
  - 4) Planning and Development Control
  - 5) Procurement
  - 6) Non Transport Emissions
  - 7) Economic Development
  - 8) Air Quality Management Area
- 2.3 These themes were put forward for public consultation between 28th October and 24th December 2015. The consultation comprised three questions, which are given as Appendix A, along with the consultation responses and the responses of the Environmental Health Team.
- 2.4 It is proposed that the Strategy is delivered through a 'live' and evolving action plan. The Environmental Health Team will coordinate and meet with key internal and external agencies in order to develop the feasibility of individual actions that contribute to the specific themes.
- 2.5 Where the actions can be delivered from within existing resources and are not contentious the team will go ahead and deliver the action under the direction of the Head of Service. Actions that require new or additional resource, or are likely to prove contentious will be reported first to the Communities, Housing & Environment Committee for approval before implementation.

### **3. AVAILABLE OPTIONS**

- 3.1 The Committee can adopt the Low Emission Strategy and the approach to developing a 'live' action plan as outlined in the report.
  - 3.2 The Committee could decide to review and amend the themes which it previously approved for the Low Emission Strategy.
  - 3.3 The Council could choose not to have a Low Emission Strategy
- 

### **4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 4.1 As the Low Emission Strategy supports a range of key priorities for the Council, including keeping Maidstone Borough an attractive place for all and encouraging good health and well-being, it is recommended that the Council has a Low Emission Strategy. The preferred option is for the Committee to keep the list of previously approved themes unchanged and that the Low Emission Strategy is adopted in its current form.
  - 4.2 The Environmental Health Department will then liaise with both internal and external partners in order to develop and evaluate specific actions to be carried out under each of the themes. Where simple, straightforward actions are identified; that can be funded from existing budgets, the Environmental Health Team will implement them without further reference to the Committee.
  - 4.3 Where the actions identified have unbudgeted cost implications, or might be controversial, the Environmental Health Team will bring the action back to the Committee for approval.
  - 4.4 In addition the Head of Housing & Community Services will provide an annual report to the Committee on progress with the Low Emission Strategy.
- 

### **5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 5.1 The public consultation was undertaken via the Maidstone Borough Council website, with the support of the Council's Policy and Information Team. The results of the consultation are given in Appendix A.
- 5.2 The consultation response was very limited, with only three respondents taking part. Two of the three respondents agreed with the aims of the Low Emission Strategy, and all three respondents agreed with the themes.
- 5.3 The comments received generally referred to a lack of detail, however, the purpose of the exercise was only to agree the themes of this high level strategy with specific actions being evaluated and decided upon in due course.

## 6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

6.1 The following timetable is proposed:

Action	Start	End
The CH&E Committee approves the Low Emission Strategy		16/02/2016
Strategy approved, implementation commences	17/02/2016	March 2021
Liaison with internal and external partners on detailed actions in support of each theme assessment of benefits, risks, costs, and feasibility of actions.	17/02/2016	March 2021
An annual report submitted to CH&E Committee on actions taken to implement the Strategy	March 2017	March 2021
Actions incorporated in annual service plans and delivered/implemented	March 2017	March 2021

## 7. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<b>Impact on Corporate Priorities</b>	Covered in the report	Head of Housing & Community Services
<b>Risk Management</b>		
<b>Financial</b>	Actions that can be delivered within existing budgets will be delivered but actions that require growth will be brought to the Committee for consideration.	
<b>Staffing</b>		Head of Housing & Community Services
<b>Legal</b>		Legal Team
<b>Equality Impact Needs Assessment</b>	None identified at this stage. Further consideration of equality impacts may need to be considered following the formulation of the action plan.	Clare Wood. Policy & Performance Officer
<b>Environmental/Sustainable Development</b>		Head of Housing & Community Services
<b>Community Safety</b>	None	Head of

		Housing & Community Services
<b>Human Rights Act</b>	None	Head of Housing & Community Services
<b>Procurement</b>		
<b>Asset Management</b>		

## 8. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix A Low Emission Strategy; Consultation Questions and Responses
- Appendix B Draft Low Emission Strategy

---

## 9. BACKGROUND PAPERS

None identified.

## APPENDIX A. Low Emission Strategy; Consultation Questions and Responses

### Consultation Question:

**Question 1.** The aims of the Low Emission Strategy are to (in no particular order):

- To achieve a higher standard of air quality across Maidstone.
- To embed an innovative approach to vehicle emission reduction through integrated policy development and implementation in Maidstone and across the region
- To improve the emissions of the vehicle fleet in Maidstone beyond the 'business as usual' projection, through the promotion and uptake of low and ultra low emission vehicles
- To reduce emissions through an integrated approach covering all appropriate municipal policy areas.

Under each aim, specific actions aimed at reducing emissions will be included. Do you agree with the proposed aims?

### Consultation Responses:

2 people agree

1 person disagrees

### Comments

*Far too vague. The Strategy must prioritise action to bring air quality into line with EU / WHO limits. A clear timetable and targets are required. Monitoring to ensure immediate action against any exceedance should be central to Strategy.*

### Environmental Health Response:

*The question specifically focuses on the aims of the Low Emission Strategy, and therefore it is not appropriate or necessary to include targets or a timetable at this early stage. Air quality monitoring is undertaken as part of the Council's Local Air Quality Management responsibilities and does not form part of the Low Emission Strategy.*

### Consultation Question:

**Question 2.** The draft Local Emission Strategy has identified several themes that we believe cover the relevant issues in this area. Do you agree with these themes?

### Consultation Responses:

3 people agree with these themes

0 people disagree

**Comments:** *Planting and vegetation are the only practical means of tackling traffic pollution in urban areas. A detailed planting strategy should be specifically headlined. Emergency*



*measures such as car free days and closure of polluted areas to traffic may need a separate heading.*

**Environmental Health Response:**

*Planting and vegetation are demonstrably not the only practical means of tackling traffic pollution. Furthermore, the Low Emission Strategy is concerned with reducing vehicle and other emissions. Whilst vegetation may absorb certain types of pollution, it does not reduce emissions and therefore would not be included in a Low Emission Strategy. Car free days and closure of areas to traffic would not really be practical as the impact on both the Town and surrounding areas would be too severe. Such measures would also be largely outside of the control of the Borough Council.*

**Consultation Question:**

**Question 3.** Do you have any other comments about emissions or our proposed aims and themes?

**Consultation Responses:**

- 1. Much better empirical data on the health impacts and numbers of deaths attributable to pollution within the Borough are required. The impacts of climate change, urbanisation, loss of street trees and other vegetation, and population growth all require more attention.*
- 2. I think Maidstone needs to focus on renewable energy sources that release a minimum amount of emissions. This is really the only way forward. Also, to encourage alternative forms of transport like cycling, it is IMPERATIVE that Maidstone Borough Council create more cycle lanes or safe places for cyclists to go as currently it's extremely dangerous and puts many (myself included) off cycling. It needs to be safer.*

**Environmental Health Response:**

*Public Health is one of the themes of the Low Emission Strategy, however, at the specific actions to be undertaken under this theme have not been decided at this early stage.*



**DRAFT**  
**LOW EMISSION**  
**STRATEGY**

**January 2016**

**Maidstone Borough Council**

# Low Emission Strategy

## 1 INTRODUCTION



In common with most other Local Authorities, Maidstone Borough has areas of poor air quality.

In 2008, the Council designated an Air Quality Management Area (AQMA) covering the whole urban area due to elevated concentrations of Nitrogen Dioxide (NO<sub>2</sub>) at residential receptors in six areas of the Borough. NO<sub>2</sub> levels at some key locations near to major roads and junctions remain above the EU Limit

Value with no discernible downward trend. The UK is now in breach of the EU Air Quality Directive and infringement proceedings have commenced. The level of fines could reach 400 million Euros and under the reserve powers of Part 2 of the Localism Act 2011, these fines can be passed on to any public authority whose act or omission has contributed to these breaches.

The predominant source of these elevated levels is the emissions of oxides of nitrogen (NO<sub>x</sub>) from road transport vehicles. Road transport vehicles are also a significant source of fine particulate concentrations in Maidstone and, although levels fall below the EU threshold, it is estimated that approximately 5.6% of deaths in Maidstone are attributable to fine particulate concentrations (less than 2.5 microns in size). In 2013, the World Health Organisation (WHO) classified diesel exhaust emissions as carcinogenic to humans.

The Maidstone Carbon Management Plan states that 35% of all Carbon Dioxide (CO<sub>2</sub>) emissions caused by Maidstone Borough Council are due to fleet operations and business travel with little progress made in reducing these emissions.

Maidstone Borough Council considered introducing a Low Emission Zone for the urban area, however, analysis showed that the costs would outweigh the potential benefits in the exceedance areas. Therefore, this Low Emission Strategy (LES), is being adopted, which will not only help improve health and the environment but will provide a platform for inward investment and competitive advantage for Maidstone.

## 2 AIMS

The aims of the Low Emission Strategy are as follows:-

- 1.** To achieve a higher standard of air quality across Maidstone
- 2.** To embed an innovative approach to vehicle emission reduction through integrated policy development and implementation in Maidstone and across the region
- 3.** To improve the emissions of the vehicle fleet in Maidstone beyond the 'business as usual' projection, through the promotion and uptake of low and ultra low emission vehicles
- 4.** To reduce emissions through an integrated approach covering all appropriate municipal policy areas. Under each area, the specific actions aimed at reducing emissions will be developed

### **3 ACTIONS**

This strategy is divided into a number of themes. We will develop and carry out actions under each of these themes. The themes are shown below together with case studies illustrating what has been done in each area by other local authorities and other organisations, demonstrating what is possible. These examples are indicative but other schemes will be investigated in developing the final actions.

#### **3.1 TRANSPORT EMISSIONS**

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.

##### **3.1.1 Public Transport; Buses**

The latest UK road-traffic emission factors show that buses are significantly higher emitters of NOx 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 vehicles, and MBC should investigate ways to improve the composition of the bus fleet in the Borough.



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.

### Case Study 1 - Brighton and Hove City Council Low Emission Zone

Brighton and Hove City Council introduced a Low Emissions Zone (LEZ) in January 2015. The area of the zone is small, but almost 98% of bus movements in the city centre pass through it. All buses passing through the LEZ will be required to be Euro V or higher, although operators have been given 5 years to bring their entire fleets up to this standard. CCTV will be used to ensure that only registered buses meeting the required standard enter the LEZ. Furthermore, buses are prohibited from leaving their engines idling in the LEZ for more than one minute, except for reasons of passenger comfort in extremely hot or cold weather. BHCC has worked with bus companies to secure grant funding to retrofit buses with suitable equipment to reduce both NO<sub>2</sub> and particulate emissions, and currently has 100 vehicles, used in the city centre, which are being upgraded.



#### 3.1.2 Taxis

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.

## **Case Study 2 - Brighton and Hove City Council Taxi Policy**

Brighton and Hove City Council has a policy prohibiting taxis from idling whilst stationary at taxi ranks. BHCC's taxi policy also has more generous age restrictions for hybrid and electric vehicles.

### **3.1.3 Freight Emission Strategy**

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.

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 CO<sub>2</sub> emissions by 10%, NOx emissions by 20%, and particulate emissions by 15%.

## **Case Study 3 – Northumberland County Council introduce the Lightfoot Eco-driving Aid**

Northumberland County Council undertook a two week trial of Lightfoot and were so impressed with the results that they have now installed it in 250 vehicles in their light vehicle fleet. This fleet includes light commercial vehicles and car derived vans, delivering a wide variety of services. The response from drivers to the new technology has been very supportive and a 7% fuel cost saving has been achieved.



Lightfoot has also been adopted by a number of Local Authorities including Nottingham and Oxford's City Councils, 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 up to 10% appears to be worthy of further consideration.

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.

#### **Case Study 4 – EcoStars**

EcoStars was created in 2008 by the four South Yorkshire Local Authorities. The second scheme started in Devon in 2010 and the third in 2012. There are now more than 20 schemes running in the UK, with the London Boroughs of Sutton and Croydon launching the newest scheme in March 2015. Originally intended for HGVs the scheme has been extended to include buses and taxis too. EcoStars now has a total of over 300 members with a total of 14000 vehicles.



#### **3.1.4 Promoting Low Emission Vehicles and Infrastructure**

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 NOx, 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 is sufficient demand can be identified.

Some grant funding is still available for electric vehicle charging points.

### Case Study 5 – Milton Keynes Council promote the use of electric vehicles

Milton Keynes Council has to date installed 170 fast/standard charging points and 56 rapid charging points, all of which are publicly available and located throughout the borough. Cars may park for free to use the charging points and are eligible for parking discounts at other times, and there are restricted parking bays in a number of car parks, which are reserved for electric vehicles.



## 4 PUBLIC HEALTH

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.

### Case Study 6 – GLA Air Quality Guides for Public Health Professionals

In 2012 the Greater London Authority produced borough specific guides on air quality for public health professionals. The aim of these documents is to provide an overview of the health impacts of air pollution in each London Borough. The documents examine the key pollutants of concern in London and the health risks associated with these. They examine the concentrations of these pollutants each borough, and the health impacts of each, along with information on vulnerable groups and the number of deaths in the borough which can be attributed to exposure to air pollution.

AIR QUALITY IN  
WANDSWORTH:  
A GUIDE FOR  
PUBLIC HEALTH  
PROFESSIONALS

MAYOR OF LONDON

## 5 CARBON MANAGEMENT

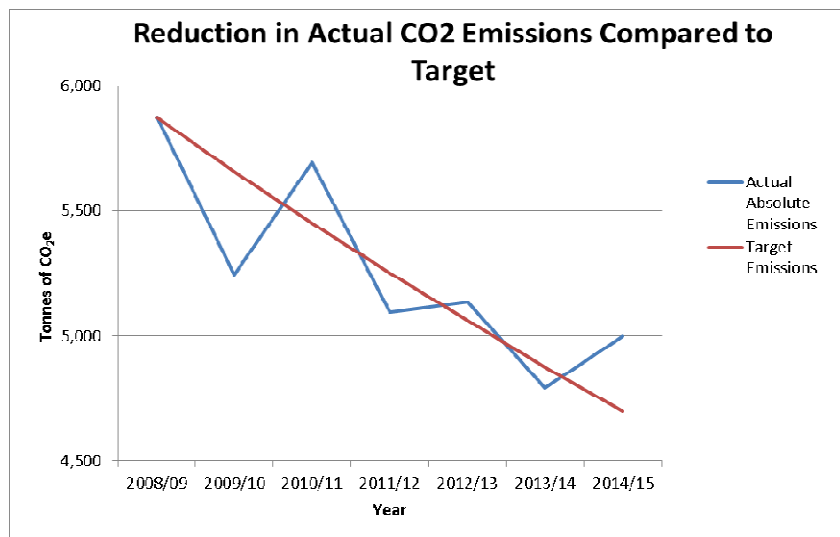
MBC produced a Carbon Management Plan, with the aim of reducing CO<sub>2</sub> emissions from its activities by 20% from the 2008-09 baseline by 2015. This equates to 5,295 tonnes CO<sub>2</sub> with a cumulative value of £1.6 million. The baseline emissions for transport (fleet and business travel) is 2,024 tonnes.

The Carbon Management Plan comprised some 44 actions and projects, some straightforward, and some aspirational, by which the target should be met.



The Plan is now complete, and the graph shows the actual annual CO<sub>2</sub> reductions which the plan achieved.

In future years, carbon management will form part of the Low Emission Strategy, rather than being a stand alone document. Actions to be investigated include the use of LED lighting in and additional PV panels in Council buildings. Such projects will be assessed on a case by case basis.



## 6 PLANNING AND DEVELOPMENT CONTROL

Effective planning policies can play a significant role in helping sustain air quality improvements by both discouraging the use of high emission vehicles and supporting the uptake of low emission vehicles, including the provision of low emission vehicle refuelling facilities, such as EV charging points.

Recently published National Planning Practice Guidance (NPPG) 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”.

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.

## 7 PROCUREMENT

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:

### 7.1 Contracts relating to goods and services provided to the Council

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 31<sup>st</sup> 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.

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.

### 7.2 Procurement of vehicles by the Council

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.

## Case Study 7 – Low Emission Strategies Partnership Guidance



The Low Emission Strategies Partnership has produced guidance in order to assist public sector organisations in meeting their environmental obligations with respect to Air Quality Management and Climate Change commitments, by providing practical advice and examples of best practice in the use of procurement to reduce road transport emissions. The guidance is aimed at professionals and politicians, without a background in public sector procurement, to understand how they can expand their capabilities, in addition to traditional approaches, to tackle the problems they are facing in

securing environmental improvements. Similarly, the guidance also aims to provide an understanding of vehicle emission reduction possibilities for procurement officers.

### 7.3 Partnerships

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.

Maidstone's Procurement Strategy should reflect all of the above legislation and guidance.

## 8 NON-TRANSPORT EMISSIONS

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, and permitted processes.

## 9 ECONOMIC DEVELOPMENT

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.

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."

The LES will also compliment the Sustainable Community Strategy for Maidstone 2009-2020 and the work of the Local Strategic Partnership.

## 10 AIR QUALITY MANAGEMENT AREA



There are six air quality hotspots within the Borough. Having identified these hotspots, rather than declare six individual Air Quality Management Areas (AQMAs), a single AQMA was declared, covering the entire urban area of the Borough. There were very good reasons for doing this, for example, administrating 6 individual AQMAs can be 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. The Air Quality Action Plan also needs to be updated to reflect the latest guidance and legislation.