

HOUSING, HEALTH AND ENVIRONMENT POLICY ADVISORY COMMITTEE MEETING

Date: Tuesday 10 October 2023
Time: 6.30 pm
Venue: Town Hall, High Street, Maidstone

Membership:

Councillors Hastie, Jeffery, Joy (Vice-Chairman), Khadka, Knatchbull
(Chairman), Mortimer, Riordan, Rose and Springett

The Chairman will assume that all Members will read the reports before attending the meeting. Officers are asked to assume the same when introducing reports.

AGENDA

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Issued on Monday 2 October 2023

Continued Over/:

Alison Broom

Alison Broom, Chief Executive

PART II

To move that the public be excluded for the items set out in Part II of the Agenda because of the likely disclosure of exempt information for the reasons specified having applied the Public Interest Test.

Head of Schedule 12 A and Brief Description

- | | | |
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INFORMATION FOR THE PUBLIC

In order to make a statement in relation to an item on the agenda, please call **01622 602899** or email committee@maidstone.gov.uk by 4 p.m. one clear working day before the meeting (i.e. by 4 p.m. on Thursday 5 October). You will need to tell us which agenda item you wish to speak on.

If you require this information in an alternative format please contact us, call **01622 602899**.

To find out more about the work of the Committee, please visit the [Council's Website](#).

MAIDSTONE BOROUGH COUNCIL

HOUSING, HEALTH AND ENVIRONMENT POLICY ADVISORY COMMITTEE

MINUTES OF THE MEETING HELD ON THURSDAY 7 SEPTEMBER 2023

Attendees:

Committee Members:	Councillor Knatchbull (Chairman) and Councillors Forecast, Jeffery, Joy, Khadka, Mortimer, Springett, Webb and D Wilkinson
Cabinet Members:	Councillor Garten, Cabinet Member for Environmental Services and Councillor Lottie Parfitt-Reid, Cabinet Member for Housing and Health
Visiting Members:	Councillors English and S Thompson

33. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Hastie, Riordan and Rose.

34. NOTIFICATION OF SUBSTITUTE MEMBERS

The following Substitute Members were noted:

- Councillor Forecast for Councillor Hastie.
- Councillor Webb for Councillor Riordan.
- Councillor D Wilkinson for Councillor Rose.

35. URGENT ITEMS

There were no urgent items.

36. NOTIFICATION OF VISITING MEMBERS

Councillor English was present as a Visiting Member for Item 10 – Member Agenda Item Request from Stuart Jeffery – Toilet Provision, Item 11 – Member Agenda Item Request from Stuart Jeffery – Rivers Task Force, Item 14 – Waste Crime Fixed Penalty Notices and Item 17 – Tackling Anti-Social Behaviour Relating to Dogs: Updating our Enforcement Tools.

Councillor S Thompson was present as a Visiting Member for Item 10 – Member Agenda Item Request from Stuart Jeffery – Toilet Provision, and Item 11 – Member Agenda Item Request from Stuart Jeffery – Rivers Task Force.

37. DISCLOSURES BY MEMBERS AND OFFICERS

There were no disclosures by Members or Officers.

38. DISCLOSURES OF LOBBYING

There were no disclosures of lobbying.

39. TO CONSIDER WHETHER ANY ITEMS SHOULD BE TAKEN IN PUBLIC DUE TO THE POSSIBLE DISCLOSURE OF EXEMPT INFORMATION

RESOLVED: That all items on the agenda be taken in public as proposed.

40. MINUTES OF THE MEETING HELD ON 11 JULY 2023

RESOLVED: That the Minutes of the meeting held on 11 July 2023 be approved as a correct record and signed.

41. FORWARD PLAN RELATING TO THE COMMITTEE'S TERMS OF REFERENCE

RESOLVED: That the Forward Plan relating to the Committee's Terms of Reference be noted.

42. MEMBER AGENDA ITEM REQUEST FROM CLLR STUART JEFFERY - TOILET PROVISION

Councillor Stuart Jeffery introduced the report and stated that it addressed two issues: signage in the town centre for public toilets and the condition of public toilets, particularly the facilities at Mid Kent Shopping Centre and asked the Committee to consider requesting an Officer report on the issue be sent to Cabinet.

The Cabinet Member for Environmental Services stated that signage for public toilets was an operational decision which the Head of Environmental Services and Public Realm can assist with. It was stated that the council utilised a Community Toilet Scheme, where the council paid businesses in the town centre to open their toilets to the public to improve availability, and that the council could consider advertising for more businesses to join the scheme. The importance of renewing public toilets was raised as anti-social behaviour had impacted the facilities at Mid Kent Shopping Centre and other facilities in the borough were reaching the end of their use.

The Committee expressed support for signage of public toilets in the town centre to be improved and that Maidstone's visitor economy would benefit from improved public toilet conditions. Several Members of the Committee expressed concern that a report to Cabinet on the issue was not necessary if the Cabinet Member for Environmental Services could demonstrate that action on public toilet signage in the town centre was being undertaken.

The Head of Environmental Services and Public Realm stated that a 12 week programme addressing the signage of public toilets and reviewing the community toilet scheme would be conducted. It was emphasised that the refurbishment of public toilets would take significantly more work and would require capital investment and work with the Property Services Team to determine which facilities would need refurbishment.

The Committee supported the 12 week programme and understanding the nature of the work requested information on the refurbishment on public toilets from the Cabinet Member for Environmental Services.

RESOLVED: That no further action be taken on the Member Agenda Item Request, and the information on the 12 week programme and the refurbishment on public toilets be provided to the Committee by the Cabinet Member for Environmental Services.

43. MEMBER AGENDA ITEM REQUEST FROM CLLR STUART JEFFERY - RIVERS TASK FORCE

Cllr Jeffery introduced the item and stated there were concerns regarding the cleanliness of the River Medway in Maidstone. It was stated that the Overview and Scrutiny Working Group on the Water Management Cycle had sent an interim report to the Cabinet but that a stakeholder group comprising the Leader of the Council and water management companies in the county could be arranged. It was proposed to send a report to Cabinet to discuss the matter.

Several Members of the Committee agreed that a report to Cabinet on issues regarding the River Medway and River Len would be sufficient, but that it would be more appropriate to schedule it for another Cabinet meeting to allow for a petition on a similar matter to be discussed at the next Cabinet meeting. During the discussion, concern was expressed that not all the stakeholders included in the Member Agenda Item Request may accept an invitation to join a stakeholder group with the Council.

In response to concerns regarding the amount of stakeholders invited, the Cabinet Member for Environmental Services emphasised that it would be difficult to facilitate a stakeholder group with so many significant stakeholders. It was stated that the Overview and Scrutiny's Working Group on the Water Management Cycle had previously contacted stakeholders in the sector and some stakeholders had not engaged.

RESOLVED: To request that an officer report on the Member Agenda Item Request from Cllr Stuart Jeffery - Rivers Task Force be presented directly to the Cabinet at the next meeting after they considered the petition on the same subject, containing costs and benefits of the scheme.

44. 1ST QUARTER FINANCIAL UPDATE & PERFORMANCE MONITORING REPORT

The Cabinet Member for Housing and Health introduced the report and stated that it was to update the Committee on finances and Key Performance Indicators (KPIs) relating to its services and provide an update on the UK Shared Prosperity Fund.

It was stated that:

- The finance budget for Housing, Health and Environment services was currently £795,000 compared to a budget of £632,000, resulting in a £163,000 overspend.

- The largest variance in budget was from homeless temporary accommodation.
- The end of year forecast variance for Housing, Health and Environment services was predicted to be an £818,000 overspend.
- Largest variances by the end of year forecast predicted to be from private rented homes and the 1,000 Affordable Homes Programme.
- 50% of the KPIs for Housing, Health and Environment services were achieved.
- Progress had been made on projects the UK Shared Prosperity Fund was funding.

The Committee considered the update and raised concerns and questions relating to the KPIs, and that only 50% had been achieved for Housing, Health and Environment services, notably those related to the Public Realm and Community Safety had not been achieved.

In response to concerns regarding Community Safety KPIs, the Cabinet Member for Health and Housing confirmed that they had held a meeting with the Minister for Justice and the Kent Police and Crime Commissioner, where reassurances had been given that the Police Officers would still patrol each Maidstone ward and that a new model of policing would be in place in March 2024.

In response to concerns regarding Public Realm KPIs, the Head of Environmental Services and Public Realm stated a recent survey of the A249 for litter had impacted the KPIs relating to Public Realm but that the timing of the survey was so that it take place before the Kent County Show in July 2023.

RESOLVED: To note:

1. The Revenue position as at the end of Quarter 1 for 2023/24, including the actions being taken or proposed to improve the position, where significant variances have been identified;
2. The Capital position at the end of Quarter 1 for 2023/24;
3. The Performance position as at Quarter 1 for 2023/24, including the actions being taken or proposed to improve the position, where significant issues have been identified; and
4. That the UK Shared Prosperity Fund update, attached at Appendix 3 to the report be noted.

45. MEDIUM TERM FINANCIAL STRATEGY AND BUDGET PROPOSALS

The Cabinet Member for Housing and Health introduced the item and stated it formed part of the finance strategy and budget proposals for the Committee's services. The Medium Term Financial Strategy had been modelled on scenarios outlined in Appendix A of the report, specifically Scenario 4.

It was stated that:

- Current projections represented a budget gap of £900k in 2024/25.

- Council tax was predicted to rise by 3% for 2024/25 subject to a referendum limit.
- Fees and charges for 2024/25 were predicted to rise by 5%, which reflects price and volume increase.
- Savings for Committee services were outlined in Appendix B to the report which would come to Full Council in February 2024.

The Committee expressed approval of disposing of the public conveniences at the Mid Kent shopping centre outlined in the report but several members of the Committee raised concerns that parking fees had not been increased but that garden waste fees had increased in the previous financial year. It was noted that the report proposed for the surplus budget for community protection to be removed and that the Council should withdraw from the Kent Resource Partnership.

In response to concerns regarding parking fees, the Cabinet Member for Housing and Health stated the Head of Housing had advised that an increase to parking at the end of the pandemic would have reduced revenue and that an annual review of parking charges would be conducted by Cabinet. Addressing concerns regarding the community protection surplus, the Cabinet Member for the Environmental Services stated that community protection would now be funded by the Police Crime Commissioner and that the £11,000 saving could be used to balance the Council's budget. It was also stated that while garden waste fees had increased, they had increased below inflation.

In response to concerns regarding the Council withdrawing from the Kent Resource Partnership the Head of Environmental Services and Public Realm stated that the proposal was an officer recommendation and that the majority of the £15,000 the Council contributed to the partnership was spent on officers and not delivery of recycling.

RESOLVED to RECOMMEND to Cabinet:

1. That the draft Medium Term Financial Strategy for 2024/25 to 2028/29 set out in Appendix A to the report be approved;
2. That the budget proposals set out in Appendix B to the report be approved.

46. **WASTE CRIME FIXED PENALTY NOTICES**

The Cabinet Member for Environmental Services introduced the report and stated that the Government had changed the statutory limits on waste crime fixed penalty notices (FPNs) and that the Council had to reflect this in its fixed penalty prices appropriately. It was proposed to create two levels of FPNs that separated single and repeat offenders and the impact of the offence, whereas the majority of the Council's FPN charges were currently set to the maximum limit. It was emphasised that the Council had to balance the affordability of the FPNs, acting as a deterrent and reducing challenges in court.

The Committee expressed support for the two levels of FPNs and enquired whether the price of FPNs could include the administrative costs of issuing an FPN.

The Head of Environmental Services and Public Realm clarified that this could only be achieved if the FPN was challenged in court, and that any increase in income from FPNs was ring-fenced to the Crime and Enforcement Team.

RESOLVED to RECOMMEND to the CABINET:

1. To agree the two-tiered Fixed Penalty Notice charges as set out in 3.4 of the report with early payment discounts for level 1 littering and fly tipping; and
2. To agree the Waste Crime Fixed Penalty Notice Policy included in Appendix A to the report.

Note: Councillor Forecast left at the conclusion of this Item at 8:17 p.m.

47. MBC HOUSING MANAGEMENT POLICIES

The Cabinet Member for Housing and Health introduced the report and stated the six Housing policies, outlined in the appendices of the report, were necessary policies for council tenants and were good practice. It was stated that the Tenants Handbook, in Appendix 1 of the report, would be produced as a physical copy for tenants and the other policies would be provided virtually but could be printed if requested. The majority of the contents were statutory information but the Committee was asked for comments on the tone of the documents.

The Committee agreed the Housing policies were good practice for the authority but that there were concerns over the Pet Policy, in Appendix 3 of the report, including the number of animals to be allowed in each property and the requirement for dogs to be vaccinated annually which could be prohibitively expensive. A Member of the Committee raised a concern regarding a clause that residents could be evicted during introductory tenancies for "other things" compared to a secure tenancy and what that could entail.

In response to concerns, the Head of Housing and Regulatory Services stated that as a Pet Policy was not a statutory requirement the council would apply discretion in cases regarding the amount of animals permitted and that that the requirement for dogs to be vaccinated would be changed to advisory. It was also confirmed that they would provide the Committee with examples of evictions during introductory tenancies due to "other things".

RESOLVED: To recommend to the Cabinet Member for Housing and Health that the suite of Housing Management Documents attached to this report are approved.

48. PUBLIC CONSULTATION IN RELATION TO THE KENT COMMUNITY WARDEN SCHEME (KCWS)

The Cabinet Member for Housing and Health introduced the report and stated that the council could respond to Kent County Council's consultation on its Community Warden Scheme and express concerns over reducing the number of community wardens for budget savings. It was stated that Maidstone shared 13 community

wardens across the borough with Tonbridge and Malling but if this was reduced it would impact the Community Protection team at Maidstone.

The Committee agreed that a response was necessary to address concerns regarding the proposed reduction in community wardens and that the consultation response set out in Appendix 2 of the report should be sent.

RESOLVED: That the Cabinet Member for Housing and Health be recommended to consider the information provided in this report and use that information to make a representation to the proposed changes.

49. TACKLING ANTI-SOCIAL BEHAVIOUR RELATING TO DOGS: UPDATING OUR ENFORCEMENT TOOLS

The Cabinet Member for Housing and Health introduced the report and stated that a new PSPO was necessary to replace the current dog control orders. It would include measures against those who failed to pick up dog faeces, those who failed to keep dogs on leads and exclude dogs from certain areas. The PSPO would also prohibit owners from walking more than 4 dogs in the town centre unless they had been licenced or were registered with the Council as a professional dog walker on its voluntary scheme.

The Committee agreed that an updated PSPO would be necessary but expressed concern over the measure to limit the number of dogs walked in the town centre by a professional dog walker, as the report outlined that there was no definition of a 'professional dog walker', and that Trinity Park and Whatman Park had been excluded from the PSPO. It was suggested that the Council's voluntary scheme for dog walkers could become permanent and the wording on Section 7c of the PSPO could be changed to include the voluntary scheme for a person qualified as a professional dog walker.

In response to concerns, the Head of Housing and Regulatory Services undertook to inform Committee members of the reasoning after the meeting. It was stated that there was no definition of "professional dog walker" in law and that the Council could not make the voluntary scheme mandatory without passing a by-law. However the Head of Housing and Regulatory Services confirmed they would explore if wording on Section 7c of the PSPO could be changed to include the voluntary scheme as a qualification for dog walkers.

To provide clarity to the Committee, the Cabinet Member for Housing and Health stated that they and the Head of Housing and Regulatory Services would inform the Committee of any further information on the park exclusions and definition of professional dog walkers.

RESOLVED: Subject to the Cabinet Member for Housing and Health receiving satisfactory clarification on the exclusion of certain parks in the order and any additional wording on professional dog walkers for paragraph 7c, they ask the Head of Housing and Regulatory Services to make a new Public Spaces Protection Order as set out in Appendix 4 of the report.

50. DURATION OF MEETING

6.30 p.m. to 9.08 p.m.







MAIDSTONE BOROUGH COUNCIL FORWARD PLAN FOR THE FOUR MONTH PERIOD 1 SEPTEMBER 2023 TO 31 DECEMBER 2023

This Forward Plan sets out the details of the key and non-key decisions which the Cabinet or Cabinet Members expect to take during the next four-month period.

A Key Decision is defined as one which:

1. Results in the Council incurring expenditure, or making savings, of more than £250,000; or
2. Is significant in terms of its effects on communities living or working in an area comprising two or more Wards in the Borough

The current Cabinet Members are:

<p style="text-align: center;">6</p>  <p style="text-align: center;">Councillor David Burton Leader of the Council DavidBurton@maidstone.gov.uk 07590 229910</p>	 <p style="text-align: center;">Councillor Paul Cooper Deputy Leader and Cabinet Member for Planning, Infrastructure and Economic Development PaulCooper@Maidstone.gov.uk 01622 244070</p>	 <p style="text-align: center;">Councillor John Perry Cabinet Member for Corporate Services JohnPerry@Maidstone.gov.uk 07770 734741</p>
 <p style="text-align: center;">Councillor Claudine Russell Cabinet Member for Communities, Leisure and Arts ClaudineRussell@Maidstone.gov.uk</p>	 <p style="text-align: center;">Councillor Patrik Garten Cabinet Member for Environmental Services PatrikGarten@Maidstone.gov.uk 01622 807907</p>	 <p style="text-align: center;">Councillor Lottie Parfitt-Reid Cabinet Member for Housing and Health LottieParfittReid@Maidstone.gov.uk 07919 360000</p>

Anyone wishing to make representations about any of the matters listed below may do so by contacting the relevant officer listed against each decision, within the time period indicated.

Under the Access to Information Procedure Rules set out in the Council's Constitution, a Key Decision or a Part II decision may not be taken, unless it has been published on the forward plan for 28 days or it is classified as urgent:

The law and the Council's Constitution provide for urgent key and part II decisions to be made, even though they have not been included in the Forward Plan.

Copies of the Council's constitution, forward plan, reports and decisions may be inspected at Maidstone House, King Street, Maidstone, ME15 6JQ or accessed from the [Council's website](#).

Members of the public are welcome to attend meetings of the Cabinet which are normally held at the Town Hall, High St, Maidstone, ME14 1SY. The dates and times of the meetings are published on the [Council's Website](#), or you may contact the Democratic Services Team on telephone number **01622 602899** for further details.

→
David Burton
Leader of the Council

Details of the Decision to be taken	Decision to be taken by	Relevant Cabinet Member	Expected Date of Decision	Key	Exempt	Proposed Consultees / Method of Consultation	Documents to be considered by Decision taker	Representations may be made to the following officer by the date stated
Property Acquisition 11	Cabinet	Cabinet Member for Housing and Health	22 Nov 2023	Yes	No Part exempt	Housing, Health and Environment Policy Advisory Committee 14 Nov 2023 Notification to Ward members and briefing to Executive and Lead Member	Property Acquisition	Rachael Bennett, Philip Morris RachaelBennett@Maidstone.gov.uk, philipmorris@maidstone.gov.uk
Property Acquisition for 1000 Affordable homes programme	Cabinet	Cabinet Member for Housing and Health	25 Oct 2023	Yes	No Part exempt	Housing, Health and Environment Policy Advisory Committee 10 Oct 2023 Notification to ward members and briefing Cabinet and Lead member	Property Acquisition for 1000 Affordable homes programme	Chris Nixon ChrisNixon@Maidstone.gov.uk
Air Quality Action Plan Air quality action plan developed as a result of revised air quality management area	Cabinet	Cabinet Member for Environmental Services	25 Oct 2023	No	No Open	Housing, Health and Environment Policy Advisory Committee 10 Oct 2023	Air Quality Action Plan	Duncan Haynes, Stuart Maxwell duncan.haynes@maidstone.gov.uk,

Details of the Decision to be taken	Decision to be taken by	Lead Member	Expected Date of Decision	Key	Exempt	Proposed Consultees / Method(s) of Consultation	Documents to be considered by Decision taker	Representations may be made to the following officer by the date stated
								stuart.maxwell@midkent.gov.uk
Housing Revenue Account The report sets out the options for management and financial accounting of the 1,000 new affordable homes.	Cabinet	Cabinet Member for Corporate Services.	22 Nov 2023	Yes	No Open	Housing, Health and Environment Policy Advisory Committee 14 Nov 2023	Housing Revenue Account	John Littlemore Head of Housing & Regulatory Services johnlittlemore@maidstone.gov.uk
Proposed Private Sector Leasing Scheme (PSL) and changes to the current Landlord Incentive Scheme (LIS).	Cabinet	Cabinet Member for Housing and Health	22 Nov 2023	No	No Open	Housing, Health and Environment Policy Advisory Committee 14 Nov 2023	Proposed Private Sector Leasing Scheme (PSL) and changes to the current Landlord Incentive Scheme (LIS).	William Cornall Director of Regeneration & Place williamcornall@maidstone.gov.uk

HOUSING, HEALTH AND ENVIRONMENT POLICY ADVISORY COMMITTEE

10 October 2023

Reference from Council – Notice of Motion – Replacement Refuse Bins

Timetable	
Meeting	Date
Housing, Health and Environment Policy Advisory Committee	10 October 2023
Cabinet	To be confirmed

Wards Affected	All Wards
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Executive Summary

Councillor Jeffery gave notice that he wished to move a motion relating to replacement refuse bins at the ordinary meeting of the Council held on 27 September 2023. Councillor Harper was the other signatory to the notice.

When moving the motion, Councillor Jeffery, with the consent of the meeting and the other signatory, altered it by deleting the first bullet point due to a recent change in policy relating to replacement refuse bins.

In accordance with Council Procedure Rule 12.9.3, at the conclusion of the debate, there being no proposal to refer the matter directly to the Cabinet, the Mayor referred the motion, as amended, to the Housing, Health and Environment Policy Advisory Committee.

This reference makes the following recommendation to the Housing, Health and Environment Policy Advisory Committee:

That consideration be given to the motion, as amended, relating to replacement refuse bins.

Reference from Council – Notice of Motion – Replacement Refuse Bins

1. REASONS FOR RECOMMENDATION

- 1.1 Councillor Jeffery gave notice that he wished to move the following motion relating to replacement refuse bins at the ordinary meeting of the Council held on 27 September 2023:

The Council's website has a published policy stating that replacement bins will be paid for by residents no matter who is responsible for the damage or loss: "Residents are responsible for looking after these bins and replacing them if they become damaged, lost or are stolen." and "You are required to pay for replacement bins."

The only time this proposal went to any Committee was Communities, Housing and Environment Policy Advisory Committee on 17th January and one short paragraph of a proposal was included in the budget paper. Within the paragraph these sentences are shown: "This proposal is to recover the costs for the provision of these bins by charging the relevant party for their replacement. A flowchart will be published setting out liability in each scenario where a replacement is required."

The statement at Communities, Housing and Environment Policy Advisory Committee is quite different to the published policy and no flow chart was presented to a Committee for discussion or agreement.

The decision to implement this policy has not been discussed or published by the Executive / Cabinet and has not had the opportunity to be called in by Overview and Scrutiny.

There are increasing numbers of complaints including where CCTV evidence of damage by contractors has been refused by officers as grounds for the Council replacing bins.

Officers have also clearly stated that bins degrade over time and need replacing through no fault of either resident or contractor. This suggests that all residents will be required to purchase new bins at some point, but this has not been communicated to residents.

Officers have stated that the policy was agreed by Council yet there is no evidence in Council papers that this is the case.

I therefore move the following motion:

This Council requires:

- That the policy of charging for replacement bins be suspended immediately.*
- That the ownership of and responsibilities for the bins be carefully considered by Councillors.*

- *That the consideration of a policy of charging for replacement bins be recommenced using the appropriate constitutional process via Housing, Health and Environment Policy Advisory Committee, Cabinet and potentially Overview and Scrutiny Committee.*
2. When moving the motion, Councillor Jeffery, with the consent of the meeting and Councillor Harper, the other signatory, altered it by deleting the first bullet point due to a recent change in policy relating to replacement refuse bins.
 3. In accordance with Council Procedure Rule 12.9.3, at the conclusion of the debate, there being no proposal to refer the matter directly to the Cabinet, the Mayor referred the motion, as amended, to the Housing, Health and Environment Policy Advisory Committee. The amended motion is as follows:

This Council requires:

That the ownership of and responsibilities for the bins be carefully considered by Councillors.

That the consideration of a policy of charging for replacement bins be recommenced using the appropriate constitutional process via Housing, Health and Environment Policy Advisory Committee, Cabinet and potentially Overview and Scrutiny Committee.

2. ALTERNATIVES CONSIDERED AND WHY NOT RECOMMENDED

Not applicable.

3. REPORT APPENDICES

A copy of the Briefing Note which was prepared to assist Members in their consideration of the motion is attached as Appendix A.

4. BACKGROUND PAPERS

Agenda for the ordinary meeting of the Council held on 27 September 2023.

Briefing Note – Council Meeting

27 September 2023

In February 2023, Council agreed the budget strategy savings which included £100k savings from the charging for replacement bins. This had previously been taken to Communities, Housing and Environment Policy Advisory Committee and Corporate Services PAC in January and to the Executive in early February.

In April 2023, charges for replacement refuse and recycling bins were introduced in line with our Mid Kent Partners. In the previous 4 years, the Council spent £1.1 million on replacement containers. The proposed charges were intended to decrease the demand for unnecessary replacement bins and reduce the cost to the Council.

The policy was reviewed quarterly to determine its impact, both positive and negative and at each stage, improvements were considered to ensure the policy was clearly communicated. This included an update to all Councillors and improving the information on the website. After 24 weeks of operation, the policy had reduced the number of replacement bin requests by 40%. However, 9% of requests resulted in a complaint. Two complaints were taken to the Ombudsman, however they declined to investigate on both occasions. Over 1,100 replacement bins have been purchased since April and 60 bins replaced by the contractor at their cost.

The main concern identified was that most bins break at the point of emptying, however not due to the fault of the collector or the resident. It was not possible to review the vehicle CCTV for every broken or missing bin, so this was carried out where other evidence or resident statement suggested it would be useful.

The policy has therefore been amended to consider the feedback and all bins that are no longer serviceable i.e. cannot be emptied by the vehicle, will be replaced for free. In most cases these will have structural damage to the body or front lip. Lost or stolen bins will remain the responsibility of the resident or landlord and residents are encouraged to number or name their bins and ensure they are returned to their property as soon as possible after collection. This is in line with the Council's existing policy for new builds or new occupiers which requires new bins to be purchased if there are none at the property.

To continue to minimise the unnecessary replacement of bins, such as for superficial damage or dirt, only bins which cannot be emptied and are reported by the collection crew will be replaced free of charge. This will usually be due to damage to the front lifting lip of the bin or to the wheels. Missing lids will not be replaced free of charge as they do not affect their use and are usually the result of the bin being overloaded and the lid not being closed when emptied. Lids are not essential to the storage and operation of the bin, as refuse should be bagged, and recycling is collected in open boxes from some properties in the borough without issue. Unfortunately, replacement lids cannot be provided as there are over 9 different makes of bin in circulation, so maintaining stocks would be impractical.

The revised policy went live from Monday 25 September, the website has been updated and the online forms are being adapted. The policy will be reviewed at the end of Quarter 3 to identify any impacts and review the budget position.

Maidstone Borough Council

Wheeled Bin Charging Policy

September 2023

For most homes, wheeled bins have been provided by the Council for the collection of recycling and rubbish. Residents are responsible for looking after these bins and replacing them if they become lost or are stolen. The charge is a contribution towards the overall cost of the bin, administration and delivery. There is no profit element. Where a bin reaches the end of its usable life, the Council will provide a replacement. The Council does not provide replacement bins where the bin remains usable, such as superficial damage or the bin is dirty.

New properties

For new build properties, the developer should provide a grey rubbish bin, green recycling bin and food waste bin at their cost. These should be purchased from the Council, however if they purchase their own, all three bins must be provided when residents move in and prior to collections commencing.

Missing bins

Residents are required to pay for replacement rubbish or recycling bins if they go missing or are stolen. Residents are advised to put their house number on their bin to ensure their bin is returned to their property and to return their bins to their property as soon as possible after collection. Bins left out on the pavement may be removed by the Council.

On occasion, wheeled bins can fall into the back of the collection vehicle during emptying. The collection crew will report this, and a replacement bin will be ordered automatically and delivered free of charge.

Additional bins

Additional recycling bins can be purchased. However additional rubbish bins are not available and only one rubbish bin will be emptied per property.

Broken bins

Broken bins that are no longer serviceable will be reported by the collection crew and a replacement bin will be ordered free of charge.

Replacement food bins are provided free of charge to promote food recycling. Replacement garden waste bins are also provided at no extra charge as the cost is recovered through the annual subscription charge.

Charges

	Charge
Bin goes missing or is stolen (excluding going into collection vehicle)	£25 per bin
New property or new occupier	£25 per bin
Replacement bin requested when bin is still usable	£25 per bin
Additional recycling bin	£25 per bin
Bin reaches end of its usable life e.g. front lip damage	No charge
Bin goes into the back of (or is crushed by) the collection vehicle	No charge

Discounts

Discounts are offered to residents in receipt of Council Tax Support. Discounted bins are charged at £15 each. In cases of extreme financial difficulty, second-hand bins will be offered when available.

Agenda Item 11

Housing Health and Environment Policy Advisory Committee

10 October 2023

Air Quality Action Plan

Timetable	
<i>Meeting</i>	<i>Date</i>
Housing Health and Environment PAC	10 October 2023
Cabinet	25 October 2023

Will this be a Key Decision?	No
Urgency	Not Applicable
Final Decision-Maker	Cabinet
Lead Head of Service	John Littlemore
Lead Officer and Report Author	Duncan Haynes/Stuart Maxwell
Classification	Public
Wards affected	All Wards but particularly High Street Ward

Executive Summary

The council declared a new Air Quality Management Area (AQMA) in Upper Stone Street on 1st December 2022. At the same time officers were requested to conduct a public consultation on a proposed Air Quality Action Plan (AQAP) to address poor levels of air quality within the Air Quality Management Area. The council is required to adopt the AQAP within 18 months of declaring the AQMA.

The public consultation was conducted by the council's engagement team between 22nd November 2022 and 29th January 2023. A total of 471 responses were received. Following the consultation, the results were discussed by a steering group made up of officers from MBC and external stakeholders who are allocated actions in the plan. The Lead Member for Communities Health and Environment and the ward members for High Street are also part of the steering group. Following this meeting actions

were added to the action plan. Following adoption the steering group will meet quarterly to monitor progress on the action plan.

The action plan will be deliberated by the Housing Health and Environment PAC before being considered by Cabinet.

Purpose of Report

Recommendation to Cabinet

This report asks the Committee to consider the following recommendation to Cabinet;

1. That the Air Quality Action Plan be adopted.

Air Quality Action Plan

1. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	<p>The four Strategic Plan objectives are:</p> <ul style="list-style-type: none"> • Embracing Growth and Enabling Infrastructure • Safe, Clean and Green • Homes and Communities • A Thriving Place <p>• Accepting the recommendations will materially improve the Council’s ability to achieve Safe, Clean and Green. The reasons why other choices will be less effective are explained in section 3 [available alternatives].</p>	Head of Housing & Regulatory Services
Cross Cutting Objectives	<p>The four cross-cutting objectives are:</p> <ul style="list-style-type: none"> • Heritage is Respected • Health Inequalities are Addressed and Reduced • Deprivation and Social Mobility is Improved • Biodiversity and Environmental Sustainability is respected <p>The report recommendation supports the achievement(s) of Health Inequalities, addresses issues to increase Biodiversity and Environmental Sustainability cross cutting objectives by ensuring that the council is actively working with appropriate partners to improve air quality within the AQMA for those people that live there and improving the environment by improving air quality through lower emissions.</p>	Head of Housing & Regulatory Services
Risk Management	Already covered in the risk section – refer to section 5 of the report	Head of Housing & Regulatory Services

Financial	<ul style="list-style-type: none"> The proposals set out in the recommendation are all within current budgetary headings, no new funding is required for implementation. 	Adrian Lovegrove
Staffing	<ul style="list-style-type: none"> We will deliver the recommendations with current staffing. 	Head of Housing & Regulatory Services
Legal	<ul style="list-style-type: none"> Accepting the recommendations will fulfil the Council's duties under The Environment Act 1995. Failure to accept the recommendations without agreeing suitable alternatives may place the Council in breach of Environment Act 1995 	Cheryl Parks Mid Kent Legal Services (Planning)
Information Governance	<ul style="list-style-type: none"> The recommendations do not impact personal information (as defined in UK GDPR and Data Protection Act 2018) the Council processes. 	Georgia Harvey
Equalities	If some strategies are updated as part of the action plan, they may require an EqIA to be completed.	Nicola Toulson
Public Health	<ul style="list-style-type: none"> We recognise that the recommendations will have a positive impact on population health or that of individuals. 	Sarah Ward
Crime and Disorder	<ul style="list-style-type: none"> There are no implications to Crime and Disorder 	Head of Housing & Regulatory Services
Procurement	<ul style="list-style-type: none"> On accepting the recommendations, the Council will then follow procurement exercises for any individual actions that require procurement. We will complete those exercises in line with financial procedure rules 	Adrian Lovegrove

Biodiversity and Climate Change	The implications of this report on biodiversity and climate change have been considered and are in line with actions 1.1 to 1.12 in the Transport theme of the Biodiversity and Climate Change Action Plan.	James Wilderspin
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2. INTRODUCTION AND BACKGROUND

- 2.1 The council declared a new Air Quality Management Area (AQMA) in Upper Stone Street, on 1 December 2022, because of exceedances of the annual mean objective for nitrogen dioxide. Officers were requested to conduct a public consultation on an Air Quality Action Plan (AQAP) to address poor levels of air quality within the Air Quality Management Area. DEFRA requires the council to adopt the AQAP within 18 months of declaring the AQMA. The AQMA covers an area of Upper Stone Street in the High Street Ward stretching from Wrens Cross to Old Tovil Road. A copy of the AQMA order is appended to this report as Appendix 1.
- 2.2 The list of actions consulted on were developed by a Steering Group consisting of Local Ward Members, Planning Officers, Environmental Health Officers, and relevant KCC Officers. It should be noted that in previous years, many actions to improve air quality in Upper Stone Street have been considered, many of which were rejected due to cost, or the likelihood of simply displacing the problem to somewhere else.
- 2.3 The public consultation was conducted by the council’s engagement team between 28 November 2022 and 29 January 2022. A total of 471 responses were received in addition to a letter from Kent County Council (KCC). The consultation report provided by the consultation team is appended to this report as Appendix 2.
- 2.4 The actions that were consulted on were grouped into themes. A brief commentary on the responses received is provided below:-

Transport: the majority of respondents felt that the actions proposed were achievable. With the exception of the measure to improve the bus fleet operating in the Maidstone area, where less than half of the respondents believed that the actions would have more than a moderate impact on air quality, although the majority considered that they would have at least some impact.

Information and Education: the majority of respondents felt that all of the actions proposed were achievable. The exception to this was the action to promote and encourage changes to transport modes, which only 42% considered achievable. Most respondents considered that measures in this category would achieve some impact.

Miscellaneous measures: this section included a review and update of planning guidance and the continuation of sponsorship of walking to school

schemes. The majority of respondents considered that these measures were achievable. Here most respondents thought that these measures would have some to slight impact.

2.5 Following the consultation, the results were discussed by the steering group and a number of actions were added to the action plan. Following adoption of the AQAP the steering group will meet quarterly for the life of the action plan to report progress on actions.

2.6 The amendments and actions added to the action plan are as follows:

Transport Theme

Additional action to explore the expansion of the additional parking restrictions currently in place on Upper Stone Street to other roads connected to it such as Palace Avenue and Knightrider Street.

Education and Awareness Theme

Additional action to prioritise promotion of the new digital resource aimed at raising awareness of Air Quality effects on health to GP's and Public Health Professionals currently being developed using DEFRA funding.

Re wording of measure 6 to specifically reference Pollution Patrol and place it at the core of our work with schools.

Miscellaneous Theme

Additional action to work with KCC to ensure that potential for appropriate and beneficial tree planting is completed on Upper Stone Street

Additional action to identify and bid for any grant funding for suitable projects.

Additional action to explore the use new and novel solutions that may be used to reduce the impact of pollution on Upper Stone Street.

Actions carried forward from previous action plan

The following actions have been carried forwards from the previous action as either no completed or being of an ongoing nature.

Extension of Clean Air for Schools Scheme via continued roll out of Pollution Patrol Resource

Anti Idling signage at suitable locations such as schools or identified problem areas

Review of EV parking provision in MBC car parks

Sponsorship of Kent Messenger Walk on Wednesday Scheme

Beneficial and suitable tree planting on Upper Stone Street

The revised actions are shown in the table below. The full action plan is appended to this report as Appendix 3.

Air Quality Action Plan Measures

Measure No.	Measure
1	Engage with bus service providers to encourage improvement to bus fleet in Maidstone, with special emphasis on services operating on Upper Stone Street
2	Explore expansion of the additional parking restrictions already introduced on Upper Stone Street to include adjacent roads such as Palace Avenue and Knightrider Street
3	Review of Air Quality Guidance to reflect updated air quality information
4	Review of Taxi Policy
5	Information Campaign to residents of the new AQMA
6	Extension to the Clean Air For Schools (CAFS) programme, with emphasis on roll-out of the Pollution Patrol Resource
7	Prioritise the AQMA and surrounding areas for roll out of new DEFRA funded Health Professionals AQ resource.
8	A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas
9	Consider discount on resident's parking for EV vehicles.
10	Review provision of EV parking in Council car parks
11	Continuation of MBC sponsorship of the Walk on Wednesday Scheme
12	Work with KCC to ensure that potential for appropriate and beneficial tree planting is completed on Upper Stone Street
13	Identify and bid for any grant funding for suitable projects.
14	Explore the use of new and novel solutions that may to reduce the impact of pollution on Upper Stone Street

3. AVAILABLE ALTERNATIVES

- 3.1 Option 1. Adopt the Air Quality Action Plan. This will ensure that the council is in compliance with its responsibilities under the local air quality regime. This will also ensure that the council and its partners are working to improve air quality on agreed measures in the Air Quality Management Area and improve the health of those residents living in the area. Several of the actions will also serve to improve air quality and public health across the whole borough. This is the recommended option.
- 3.2 Option 2. Do not adopt the Air Quality Action Plan. This option will mean that the council is in breach of its legal responsibilities under the local air quality regime. Any work to improve air quality will be unfocussed and there will be no obligation for partners to contribute to this work. This is not a recommended option.
- 3.3 Option 3. Make changes to the proposed action plan. This option will ensure that the council is compliant with the local air quality regime and will ensure that the council and partners are working to improve air quality. There is a risk that further exploration of additional actions will take the adoption of an Action Plan outside the 18 month period specified in the local air quality regime and delay implementation of actions to improve air quality. This not a recommended option.

4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 The preferred option, option 1 is the adoption of the AQAP as presented. The proposed actions have been subject to public consultation, the results of this consultation have then been considered and discussed in detail by a steering group made up MBC officers, external partners and elected representatives. The result of the steering group meeting was the addition of the additional actions detailed above.
- 4.2 It is considered that the proposed action plan has therefore been subject to suitable engagement and scrutiny by appropriate representatives of MBC and external partners.
- 4.3 The action plan as presented is achievable and while focussed on the specific AQMA will also benefit air quality across the borough.
- 4.4 The proposed action plan will ensure that the council is compliant with the requirements of the local air quality regime.

5. RISK

- 5.1 The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's Risk Management Framework. The only significant risk is associated with not adopting the AQAP, which would mean that the Council could no longer demonstrate compliance with the relevant legislation and

statutory guidance. We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.

6. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK

6.1 A public consultation was conducted by the council's engagement team between 28 November 2022 and 29 January 2022. A total of 471 responses were received in addition to a letter from Kent County Council (KCC). The consultation report provided by the consultation team is appended to this report as Appendix 2.

6.2 The actions that were consulted on were themed, a brief commentary on the responses received is.

- Transport: the majority of respondents felt that the actions proposed were achievable, however with the exception of the measure to improve the bus fleet operating in the Maidstone area less than half of the respondents believed that the actions would have more than a moderate impact on air quality, although the majority considered that it would have at least some impact.
- Information and Education; the majority of respondents felt that all of the actions proposed were achievable. The exception to this was the action to promote and encourage changes to transport modes, here only 42% considered it achievable. The majority of respondents considered that measures in this category would achieve some impact.
- Miscellaneous measures: this section included review and update of planning guidance and the continuation of sponsorship of walking to school schemes. The majority of respondents considered that these measures were achievable. Here the majority of respondents thought that these measures would have some to slight impact.

6.3 Following the consultation, the results were discussed by a steering group made up of officers from MBC and external stakeholders who are allocated actions in the plan. The Cabinet Member for Communities Health and Environment and the ward members for High Street Ward are also part of the steering group. Following this meeting a number of actions were added to the action plan.

The amendments and actions added to the action plan are as follows are detailed above.

7. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

7.1 Following adoption of the AQAP the action plan will be provided to DEFRA for approval, then published on the councils website.

7.2 In addition those internal and external partners responsible for the delivery of actions will be contacted to advise them that the action has been adopted. They will then be invited to the quarterly steering group to provide regular progress reports. The lead member for Housing Health and Environment and ward members will also be invited to join the steering group.

7.3 An annual status report is required by DEFRA covering air quality monitoring and progress on the action plan.

8. REPORT APPENDICES

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

- Appendix 1: Declaration of the Air Quality Management Area Order
- Appendix 2: Public Consultation Results Report
- Appendix 3: Air Quality Action Plan

9. BACKGROUND PAPERS

None

**ENVIRONMENT ACT 1995 PART IV SECTION 83(1) AS AMENDED BY
ENVIRONMENT ACT 2021**

MAIDSTONE BOROUGH COUNCIL

AQMA ORDER

**MAIDSTONE BOROUGH COUNCIL, IN EXERCISE OF THE POWERS CONFERRED
UPON IT BY SECTION 83(1) OF THE ENVIRONMENT ACT 1995, HEREBY MAKES
THE FOLLOWING ORDER.**

This Order may be cited as the Maidstone Upper Stone Street Air Quality Management Area (2022) and shall come into effect on 1st December 2022. The area shown in red on the attached map "Proposed Upper Stone Street AQMA" is to be designated as an air quality management area (the designated area). The designated area incorporates the stretch of Upper Stone Street between Wrens Cross and Old Tovil Road. This Area is designated in relation to a breach of the nitrogen dioxide (annual mean) objective as specified in the Air Quality Regulations 2000. This Order came into force on 1 December 2022 and shall remain in force until it is varied or revoked by a subsequent order.

**THE COMMON SEAL OF MAIDSTONE BOROUGH COUNCIL WAS HERETO
AFFIXED ON 8 DECEMBER 2022 AND SIGNED IN THE PRESENCE OF CLAUDETTE
VALMOND ON BEHALF OF SAID COUNCIL.**



AUTHORISED SIGNATORY

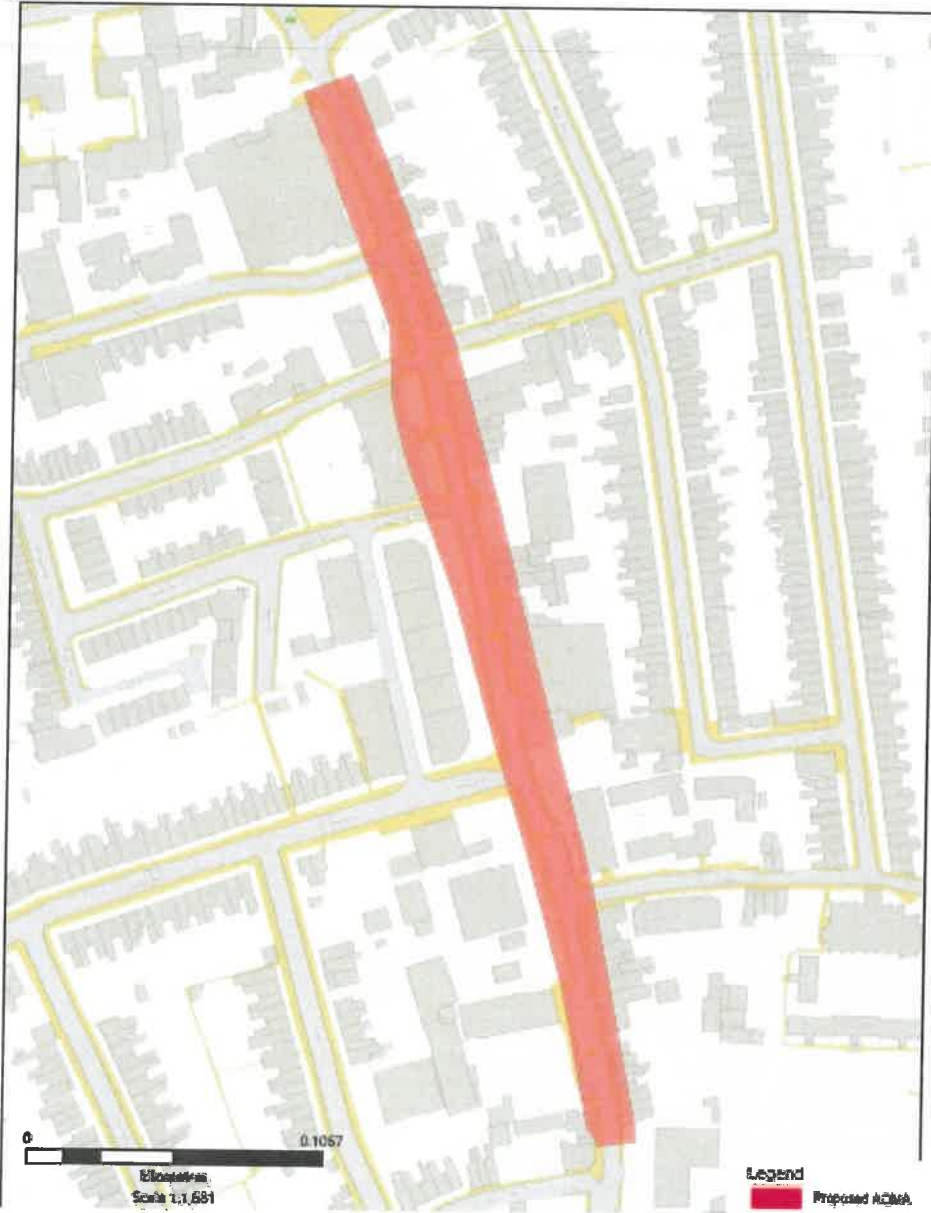


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Proposed Upper Stone Street AQMA

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AUTHORISED SIGNATORY





AIR QUALITY ACTION PLAN CONSULTATION

March 2023

ABSTRACT

This report summaries the responses and presents the result to consultation on the draft actions for the Councils Air Quality Action Plan.

Consultation@maidstone.gov.uk

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Introduction

Air Quality Action Plans are the mechanism by which local authorities, in collaboration with national agencies and others, state their intentions for working towards air quality objectives through the use of the powers they have available.

A draft Air Quality Action Plan (AQAP) was produced in September 2022 as part of the Council's duty to improve local air quality. It outlines the actions MBC will undertake to improve air quality in the borough between 2023 and 2028.

Methodology

Maidstone Borough Council undertook a consultation between 28 November 2022 and 29 January 2023.

The survey was carried out online with a direct email to those on the Council's consultation mailing list. It was also promoted through the Council's social media channels. Paper copies of the survey and alternative formats were available on request. The survey was open to all Maidstone Borough residents aged 18 years and over and visitors to the borough.

Respondents were asked their opinions about the proposed actions for the Air Quality Management Plan. There was opportunity throughout to provide additional comments.

There was a total of 471 responses to the survey and a letter commenting on the proposed actions was received from KCC (attached at Appendix A).

The data has not been weighted; however, the bottom two age brackets were combined to create the 18 to 34 years group. Please note not every respondent answered every question; therefore, the total number of respondents, refers to the number of respondents for that question, not to the survey overall. Comments have been categorised according to content with some covering more than one category.

Transport Measures

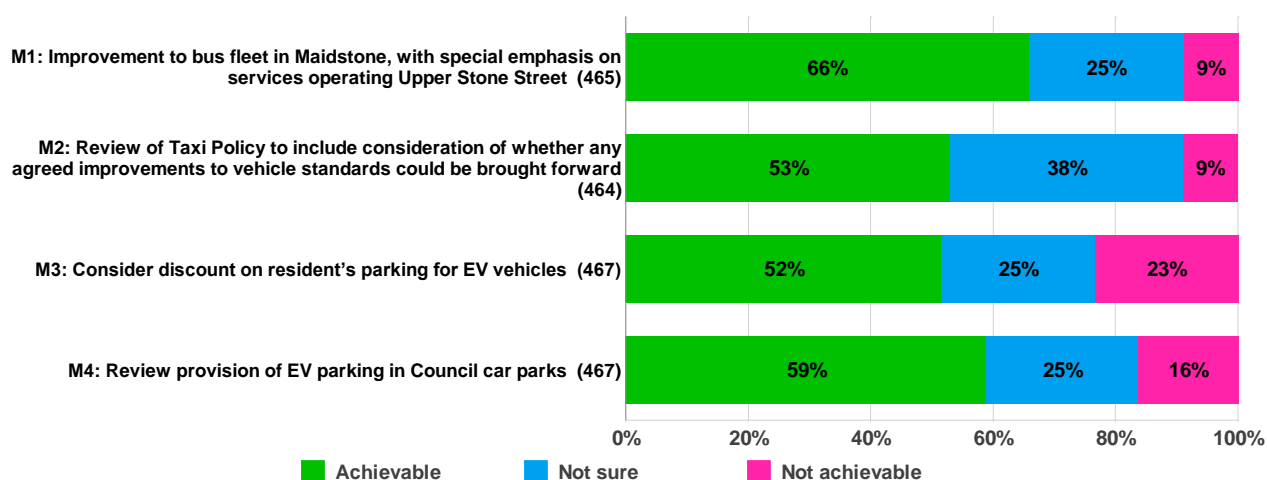
Achievability of Transport Measures

Respondents were asked to review the proposed transport measures and were asked if they were achievable or not.

A total of 467 respondents answered these questions.

Overall, Measure 1, 'Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street' was considered to be the most achievable with 66% responding this way.

Measure 3, 'Consider discount on resident's parking for EV' was considered the least achievable with the greatest proportion answering 'not achievable' across the transport measures. 23% of respondents answered this way and the lowest proportion stating it was achievable at 52%.



Demographic Differences

The data showed that there was a greater proportion of male respondents that felt Measure 3, 'consider discount on resident's parking for EV vehicles' was unachievable with 27% compared to 18% of female respondents.

Male respondents also had a greater proportion than female respondents that answered, Measure 4, 'review provision of EV parking in council car parks' was unachievable with 19% answering this way compared to 12% of female respondents.

Additional Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way. The comments are set out, by question, in the tables below:

M1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street (40 Comments)		
Theme	No.	Nature
Traffic Flow	9	A bypass is needed. Redirect traffic from Upper Stone Street.

M1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street (40 Comments)		
Theme	No.	Nature
		Stationary traffic is the issue.
Public Transport doesn't meet needs	8	Bus services have been cut and services have been reduced. Services are unreliable. Will only work if there are dedicated bus lanes.
Cost	6	Who will pay for improvements to the fleet? Too expensive.
Little or no impact	6	Unconvinced measure will result in improvements to air quality. Buses have to use this route. Buses are in the minority of vehicles on the roads.
No control	6	The Council has no control over private bus fleet operators.
P&R	3	Condemnation over the cutting of P&R services.
Environmentally Friendly Buses	3	Why not hydrogen cell yet? Make all buses hydrogen or electric.
Other	2	Bring back trolley buses. Stop buses from idling.

M2: Review of Taxi Policy to include consideration of whether any agreed improvements to vehicle standards could be brought forward (34 Comments)		
Theme	No.	Nature
Impact on taxi drivers	18	Would make running a taxi unviable. Unfair on taxi operators. New EV Taxis are expensive.
Little or no impact	5	Taxis are not the issue. Taxis already at a high standard.
Cost of living/Cost of fares	4	This policy should not be brought forward as people are already struggling with the cost-of-living crisis. This will result in increased fares for taxi users.
Electric Vehicles	3	Need electric taxis. No infrastructure for electric vehicles. Issues recycling lithium batteries.
Other	3	This is outside the Council's remit. Taxi standards have declined (vehicles & driver skills). The technology is not available to implement this measure.
Uber	2	Will this include Uber drivers' vehicles? Invention of Uber means this can not be regulated.

M3: Consider discount on resident's parking for EV vehicles (99 Comments)		
Theme	No.	Nature
Unfair	34	This measure is unfair and discriminates against those who cannot have EVs. EV owners should not get any special treatment.
EV Expense	26	EVs are expensive. Majority of people cannot afford to buy an EV.
Space issues	9	Resident parking is at a premium. This will not improve situation as still more cars than spaces. There is not currently enough resident on-street parking.

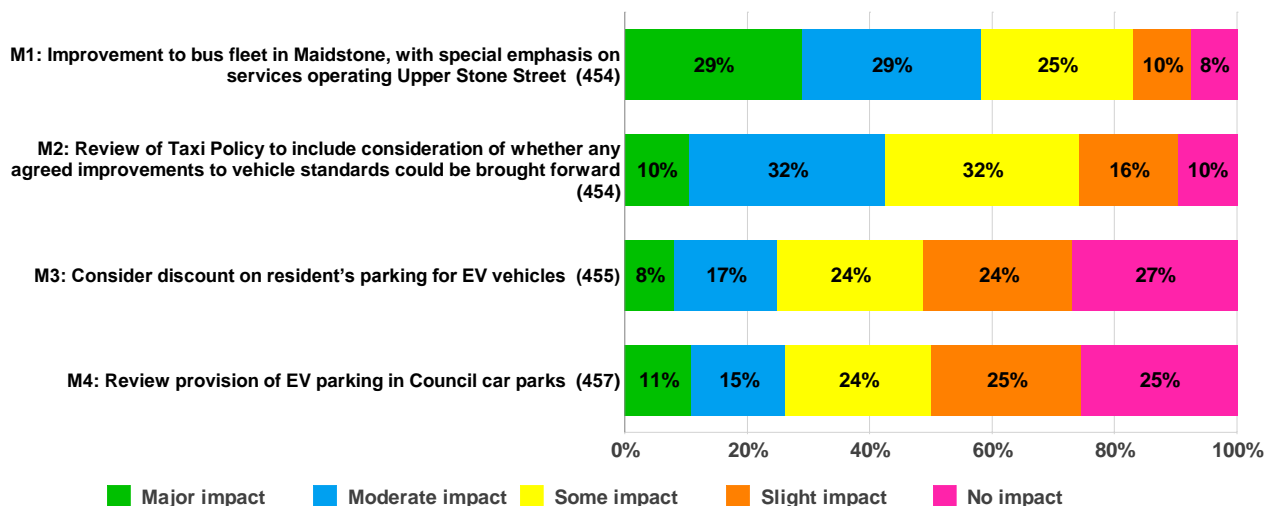
M3: Consider discount on resident's parking for EV vehicles (99 Comments)		
Theme	No.	Nature
Impact on Council finances	9	Waste of money as bigger priorities. Uncollected money is a lost for the Council. Council cannot afford to lose the revenue.
Too soon for EV	9	Wait five years for this measure when EVs will have improved (and more people have them). Electric shortages expected this year. Issues with recycling/disposing of EV batteries still need to be resolved.
Little to no impact	8	All vehicles pollute in some way (brake dust and rubber) and take up the same space. Measure does not meaningfully incentivise EV take up. Amount of EV vehicles too small to make an impact.
EV Infrastructure	6	Cost of installation will not be recoverable for several years. This measure will cost too much to implement. Wider infrastructure for EVs still requires investment to make it a viable alternative to petrol.
Traffic & Traffic Flow	3	Would be better addressing pinch point in traffic and improving/changing the one-way system. Queuing traffic/congestion needs to be addressed.
Parking charges	2	Should not have to pay to park outside your own house.
Other	2	Should be encouraging mode changes. Government has introduced road tax for EV due to loss of revenue.

M4: Review provision of EV parking in Council car parks (63 Comments)		
Theme	No.	Nature
Unfair	25	Creates preference system – EV owners should pay the same as everyone else. Unfair for EV owners to get special treatment.
Limited parking	15	Already a shortage of parking spaces. Current EV spaces not used.
EV Infrastructure	9	This measure is too expensive. There is a lack of wider infrastructure to support EVs.
Little to no impact	9	EVs still cause pollution (displaced to manufacturing process). Improvements to air quality arising from this measure likely to be negligible. EVs are in the minority of vehicles.
Other priorities	4	There currently are more important issues for MBCs budget than implementing this measure.
Deters visitors to Maidstone	4	Implementing this measure would deter people from visiting Maidstone. People will shop elsewhere if they cannot park.
Other	3	EVs expensive. Vandalism would be an issue. EVs need long periods to charge (short charges impact on battery life).
Traffic Flow	2	Improve traffic flow by removing traffic lights and improving one-way system. Introduce enforceable speed limit for HGVs going through Harrietsham.

Impact of Transport Measure

Respondents were asked to indicate what impact they thought each of the measures would have on air quality locally.

A total of 457 respondents answered these questions. Overall, respondents felt that Measure 1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street, would have the greatest impact. 59% of respondents said that this would have a Major or Moderate impact. Respondents felt that Measure 3 Consider discount on resident’s parking for EV vehicles would have the least impact with 51% responding that this measure would have a slight impact or no impact.



Demographic Differences

The data show that a greater proportion of female respondents felt that measure 1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street, would have a major or moderate impact on air quality locally with 64% answering this way compared to 54% of male respondents.

There were no respondents aged 18 to 34 years that said that Measure 3: Consider discount on resident’s parking for EV vehicles, or Measure 4: Review provision of EV parking in Council car parks, would have a major or moderate impact.

A greater proportion of male respondents answered slight or no impact when asked about measure 3 with 57% responding this way compared to 42% of female respondents.

Male respondents also had a greater proportion responding slight or no impact when asked about measure 4 with 56% responding this way compared to 41% of female respondents.

Transport Measures General Comments

All respondents were given the opportunity to provide additional comments about the proposed Transport measures, a total of 172 comments were received.

Transport General Comments		
Theme	No.	Nature
Traffic Flow & Management	57	Congestion is the main issue. Remove traffic lights and create a bypass to improve air quality in the Town Centre. Create a Clean Air Zone. Prevent and enforce idling (Taxis and Busses in High Street).
Public Transport	48	Update all the buses. Improve public transport – cheaper and more frequent services. Make public transport more attractive to people.
EV Vehicles	36	EVs are expensive - financial incentives to buy could help take-up. Counterproductive – electricity is not generated in an environmentally friendly way. EVs are in the minority of vehicles on the roads. More Council charging points needed.
P&R	20	Bring back the P&R service. P&R will reduce the number of vehicles in the Town centre.
Active Travel	16	More bicycle lanes and secure storage in the Town centre. Encourage cycling with safe (& segregated routes). Improvement pavements.
Little to no impact	16	Trivial measures that will only have a marginal impact. These measures do not go far enough and will not impact pollution.
HGVs	11	Divert HGVs from the Town centre. Restrict HGVs traveling through Town. HGVs are the biggest polluters.
Development	9	Development has increased the number of vehicles on roads. Development is not supported by road and highways infrastructure upgrades. Stop building so many new homes.
Other Comments	5	Do not reduce the AQMA. Do not penalise petrol vehicle users. Protect green spaces. Measure would impact on Council revenues. Too many people are the real cause of pollution.
Behaviour Shift	4	Need more meaningful measures to facilitate a behaviour shift from private vehicles.
Other Areas	3	Upper Stone Street is not the only area of concern. These measures only relate to the Town Centre rather than villages.
More detail	3	Requests for more details on the proposed measures.
Suggestions	2	Introduce charges for commercial vehicles parking overnight. Remove all diesel vehicles registered before 2016.

Information & Education Measures

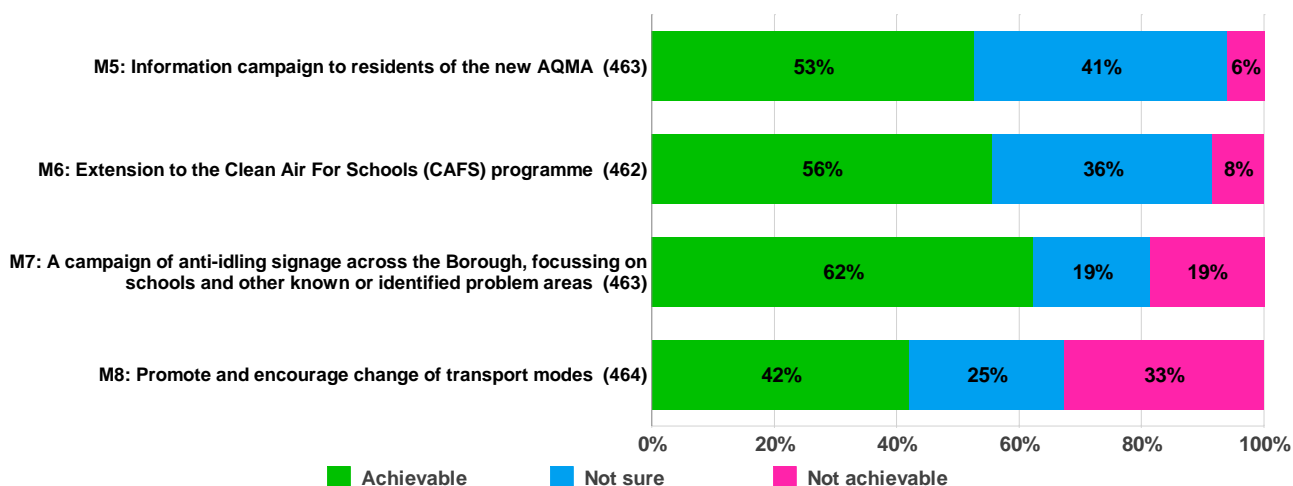
Achievability of Information & Education Measures

Respondents were asked to review the proposed information and education measures and were asked if they were achievable or not.

A total of 464 answered these questions.

Overall, Measure 7, 'A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas' was considered the most achievable with 62% responding this way.

Measure 8, 'Promote and encourage change of transport modes' was considered the least achievable with the greatest proportion of respondents answering 'not achievable' across the information and education measures with 33% answering this way and the lowest proportion stating it was achievable at 42%.



Demographic Differences

The data showed a greater proportion of female respondents felt that Measure 6, 'Extension to the Clean Air for Schools (CAFS) programme' was achievable with 62% answering this way compared to 51% of male respondents.

Respondents aged 18 to 34 years had the greatest proportion, across the age groups, that said Measure 6 was unachievable with 29% responding this way.

A greater proportion of female respondents answered that Measure 7, 'A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas' was achievable with 71% answering this way compared to 58% of male respondents.

A greater proportion of respondents from minority groups felt that Measure 8 'Promote and encourage change of transport modes' was achievable with 67% answering this way compared to 41% of respondents from white groups.

A greater proportion of female respondents answered that Measure 8 was achievable with 49% answering this way compared to 37% of male respondents.

Additional Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way. The comments are set out, by question, in the tables below:

M5: Information campaign to residents of the new AQMA (22 Comments)		
Theme	No.	Nature
Little to no impact	12	People don't pay attention to these campaigns. Will not change behaviour. People don't care about air quality.
Cost	7	This measure is a waste on money. This measure is too expensive.
Other	5	People will still need to get from A to B. The general public do not take their responsibility towards air quality seriously. EV infrastructure is not available yet.

M6: Extension to the Clean Air For Schools (CAFS) programme		
Theme	No.	Nature
Ignored	15	This measure will not have any impact as it will be ignored.
Cost	5	Don't waste money on pointless campaigns.
Discriminatory	4	This measure would be discrimination – people who don't have children and those that cannot afford EVs.
Logistics	3	Children do not live locally /in walking distance of their schools. Public transport is too unreliable for school transport.
Other	3	Stop making people use EVs. Areas of high pollution- around the Montessori School & Tonbridge Road (by College).
Enforcement	2	MBC can't enforce this. Schools can't enforce this.

M7: A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas		
Theme	No.	Nature
Ignored/Little to no impact	39	Will be ignored - particularly in cold and wet weather. Signage alone will make no difference and will be ignored. This measure is not significant enough to make a difference to air quality.
Enforcement	16	Without sanctions this is waste of money. This needs proper enforcement to work. This cannot be enforced.
Traffic	14	The high volume of traffic on Maidstone's roads makes this measure ineffective. Structure of road system and network causing pollution. Improve traffic lights. Constant roadworks cause congestion.
Cost	9	This is a waste of money. Money for signs could be better spent elsewhere.

M7: A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas		
Theme	No.	Nature
Newer vs Older vehicles	8	Many newer vehicles have automatic cut outs. Idling only an issue with older vehicles (and not everyone can afford to upgrade).
Other	4	Discourage people driving to schools. This aims to restrict movement and move to hybrid learning under the guise of climate change. Maidstone does little for pedestrians who are the most at risk of poor air quality.

M8: Promote and encourage change of transport modes (141 Comments)		
Theme	No.	Nature
Public transport	73	Public transport is unreliable and expensive. Many places do not have bus services. Bring back the P&R service. Bus services are being cut.
Behaviour change/Car Reliant	42	Cars are the only options – alternative are not viable. The car is the most convenient way to travel in Maidstone. Behaviour change impractical for many.
Active transport	17	More cycle lanes and footpaths away from roads needed. Older demographic unable to walk or cycle. Feels unsafe cycling in Maidstone.
EVs	10	EVs are too expensive for most – more purchase incentives required. EV charging network needs work.
Impact	9	Without enforcement or penalties measure will be ignored. The Council has no control in this area. Measure will have minimal impact on air quality.
Traffic & Traffic Management	7	Road are not big enough (and no space for trams or trolley buses). Need alternative routes to south of the Borough that bypass the town centre.
Development	6	Too many homes being built. New housing development are not served by public transport. Infrastructure has not kept up with development.
Cost	5	This is a waste of money. This measure would be expensive to implement. There are no available funds to support this measure.
Other	3	Need to set harder targets. Need more data on people modes of transport and journeys. Run a school's bus service like in America.

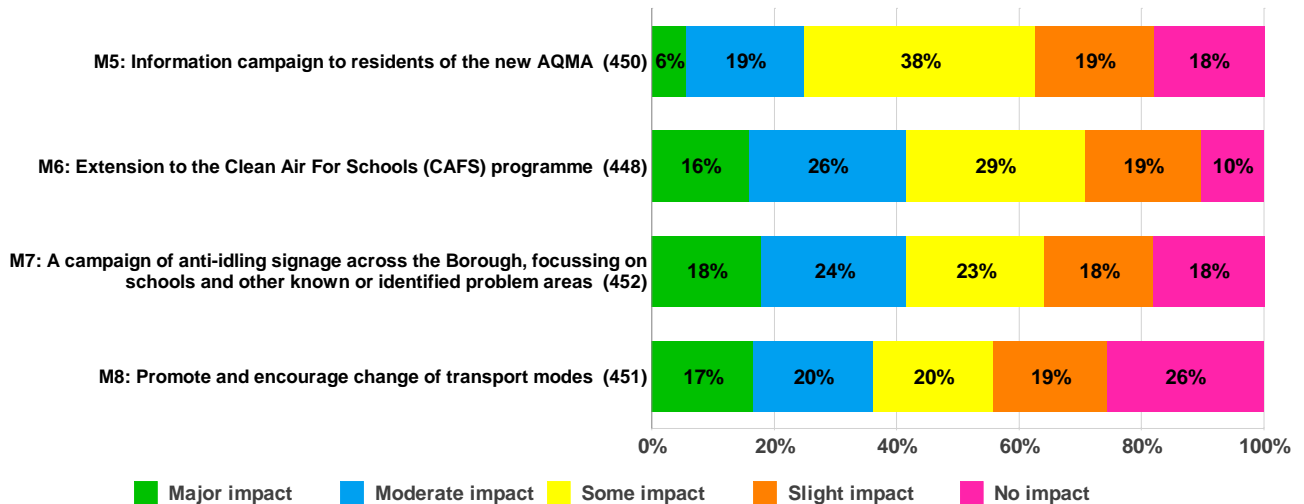
Impact of Information & Education Measures

Respondents were asked to indicate what impact they felt each of the measures would have on air quality locally.

A total of 458 respondents answered these questions.

Overall, respondents felt that Measure 7: A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas would have the greatest impact with 42% responding Major or Moderate impact.

Respondents felt that Measure 8: Promote and encourage change of transport modes would have the least impact with 44% responding that this measure would have a slight impact or no impact.



Demographic Differences

The data show that a greater proportion of male respondents felt that measure 5: Information campaign to residents of the new AQMA, would have a only a slight impact or no impact on air quality locally with 43% answering this way compared to 28% of female respondents.

A greater proportion of female respondents felt that measure 6: Extension to the Clean Air For Schools (CAFS) programme, would have a only a major or moderate impact on air quality locally with 53% answering this way compared to 35% of male respondents.

A greater proportion of male respondents responded slight or no impact when asked about measure 7 with 42% responding this way compared to 26% of female respondents.

A greater proportion of male respondents responded slight or no impact when asked about measure 8 with 51% responding this way compared to 32% of female respondents.

Information & Education General Comments

All respondents were given the opportunity to provide additional comments about the proposed Information & Education measures, a total of 115 comments were received.

Information & Education Measures Additional Comments		
Theme	No.	Nature
Impact	22	Measures are a waste of time and money. Promotion and encouragement will not be enough to get people on board. Measures will be ignored unless enforced. Measure will have little impact on air quality.
Schools Transport	20	Schools traffic is a significant contributor to air quality and congestion in Maidstone. Most children live too far away from their school to walk to cycle. Walking & cycling in some rural areas is dangerous for children. Cycling classes in schools would help normalise cycling. Encourage schools to encourage their pupils to use active transport methods and public transport.
Traffic	19	Focus on improving traffic flow. Review traffic lights to reducing queuing. Maidstone needs a by-pass or ring road.
Idling	17	Anti-idling signage will not work unless it is enforced. Anti-idling should apply to buses and HGVs. Anti-idling campaigns around schools should be wider than just the road that the school is on.
Behaviour	11	Promote car sharing and travelling off-peak. Measures need to be easy to achieve or they will be ignored. Behaviour changes difficult without incentives and sanctions.
Active Transport	7	Maidstone is walkable but pedestrians are exposed to high levels of pollution. Improve provisions for cycling. Promote cycling and walking.
EVs	7	EVs are not affordable for most residents. Do more to support residents change to EV by supporting resident to install or installing EV chargers on residential streets.
Air Quality Data	7	More information requested on details of the proposals. Data being used to evidence AQMA is flawed.
Park & Ride	6	Should not have cut the P&R services.
Car Alternatives	6	There are no alternatives that are as convenient or cost effective as travelling by car.
Suggestions	5	More tree and bushes. Scrappage grants for older and diesel vehicles. Consider electric scooters (subject to standards) as an alternative mode of transport (particularly for school children). Use of smaller vans and commercial vehicles at peak times (Ashford model).
Development	4	Extra vehicles on the town's roads are due to extensive house building in the borough. Development has created out of town estates that are reliant on the car.
Other	3	No backdoor taxation for road users. Wood burning stoves contribute to poor air quality. Lobby for top tier authorities with highways responsibilities to be responsible for AQMA's.

Miscellaneous Measures

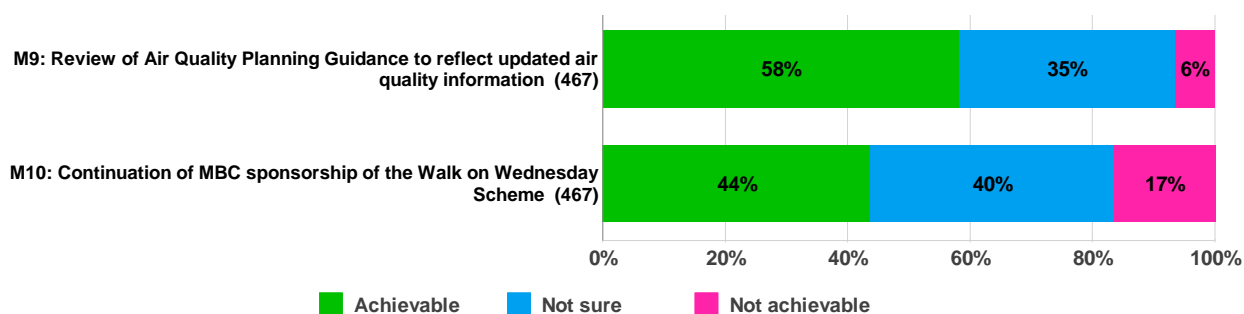
Achievability of Miscellaneous Measures

Respondents were asked to review the proposed transport measures and were asked if they were achievable or not.

A total of 467 answered these questions.

Overall, Measure 9, 'Review of Air Quality Planning Guidance to reflect updated air quality information' was considered the most achievable with 58% responding this way.

Measure 10, 'Continuation of MBC sponsorship of the Walk on Wednesday' was considered less achievable with 17% answering this way.



Demographic Differences

29% of Respondents aged 18 to 34 years said that Measure 9 'Review of Air Quality Planning Guidance to reflect updated air quality information' was unachievable, the highest response across all age groups.

A greater proportion of respondents from minority groups felt that Measure 9 was achievable with 83% answering this way compared to 58% of respondents from white groups.

Additional Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way. The comments are set out, by question, in the tables below:

M9: Review of Air Quality Planning Guidance to reflect updated air quality information (24 Comments)		
Theme	No.	Nature
Impact	14	A review will make difference. People have to rely on their cars so traffic will not be reduced.
Development	3	Development has lacked transport infrastructure. Planning doesn't care about environmental issues.
Costs	2	This measure is too expensive. This measure needs more investment.
Other	2	Should not have cut P&R. Do not support the 'Great Reset'.
Data	1	More information needed to make an informed decision.
Suggestions	1	Plant more trees. Subsidies for EVs.

Traffic	1	Sort out the one-way system.
M10: Continuation of MBC sponsorship of the Walk on Wednesday Scheme (75 Comments)		
Theme	No.	Nature
Impractical	18	People live too far away to walk to work/school. Not everybody can walk. People don't want to walk in poor weather/in the dark. Shopping locations out of town require a car for access and carrying goods.
Unaware of walk on Wednesday scheme	17	What is Walk on Wednesday? Unaware of this scheme.
Impact	17	This will be ignored. This measure will have minimal impact (particularly in the Lower Stone Street area). This will not impact on congestion. Impact would be greater if walking scheme was more than one day a week.
Waste of money	11	This measure is a waste of money.
Behaviours	8	People are unlikely to take part – will continue to use preferred method of transport.
Active travel	6	Cycling and walking are unsafe. There is a lack of cycle lanes/paths. Footpaths are narrow, overgrown and are dirty.
Other	3	Sort out the one-way system. Do not support the 'Great Reset'. Bus services being cut and no routes in rural areas.
Development	1	Nothing about reducing emissions from development.

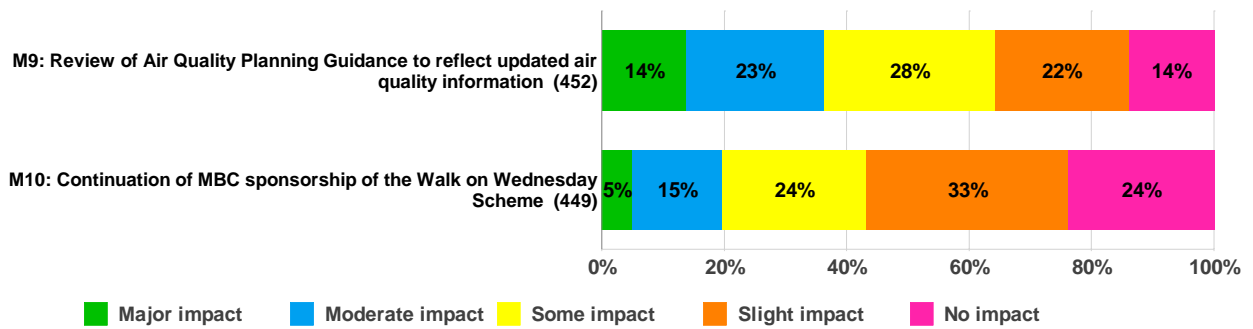
Impact of Miscellaneous Measures

Respondents were asked to indicate what impact they thought each of the measures would have on air quality locally.

A total of 452 respondents answered these questions.

Overall, respondents felt that Measure 9: Review of Air Quality Planning Guidance to reflect updated air quality information would have the greatest impact with 37% responding Major or Moderate impact. However, only a marginally lower proportion said that this measure would have a slight impact or not impact with 36% answering this way.

More than half of all respondents felt that Measure 10: Continuation of MBC sponsorship of the Walk on Wednesday Scheme would have a slight impact or no impact at all with 57% answering this way.



Demographic Differences

43% of female respondents felt that measure 9: Review of Air Quality Planning guidance to reflect updated air quality information, would have a major or moderate impact on air quality compared to 32% of male respondents.

66% of male respondents responding slight or no impact when asked about measure 10: Continuation of the MBC sponsorship of the walk on Wednesday Scheme compared to 44% of female respondents.

Miscellaneous Measures General Comments

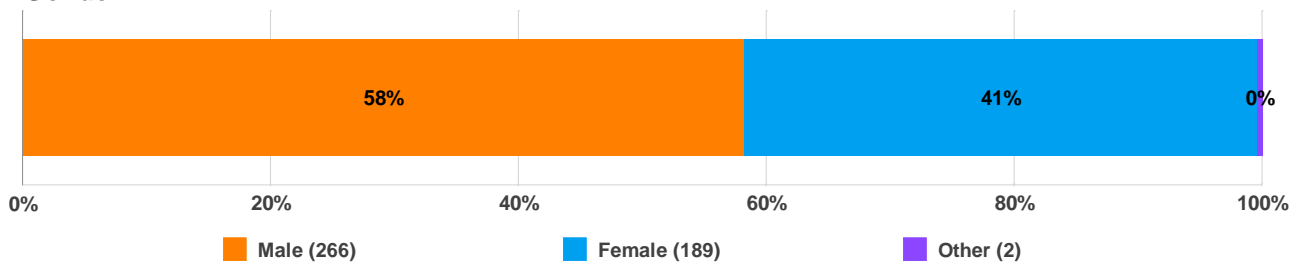
All respondents were given the opportunity to provide additional comments about the proposed Miscellaneous measures, a total of 94 comments were received.

Miscellaneous Measures Additional Comments		
Theme	No.	Nature
Walking Scheme	32	Never heard of the Walk on Wednesday scheme. People who want to walk already do.
Suggestions	16	Plant more trees. Increase parking charges to discourage car use. Introduce stopping restrictions outside of schools and low traffic neighbourhoods. Promote walking buses and car sharing. Incentivise walking through trough CT discount. Link AQMA to Sustainability DPDs. Introduce a congestion charge. Look at installing City Trees (Wandsworth LA example). More cycle paths.
Impact	13	Measures will have little impact. Achievability of measure depends on will of the Council.
Development	13	Build fewer homes. Development should be designed to encourage walking. Travel infrastructure has not kept up with the speed of house building. This will slow down housing delivery.
Public Transport	12	Reinstate P&R. Buses do not cover all areas of the borough. Public transport needs to improve.
Traffic	11	Concentrate on reducing congestion and improving traffic flow. Improve the one-way system. Review traffic lights to target traffic flow at pollution hotspots.

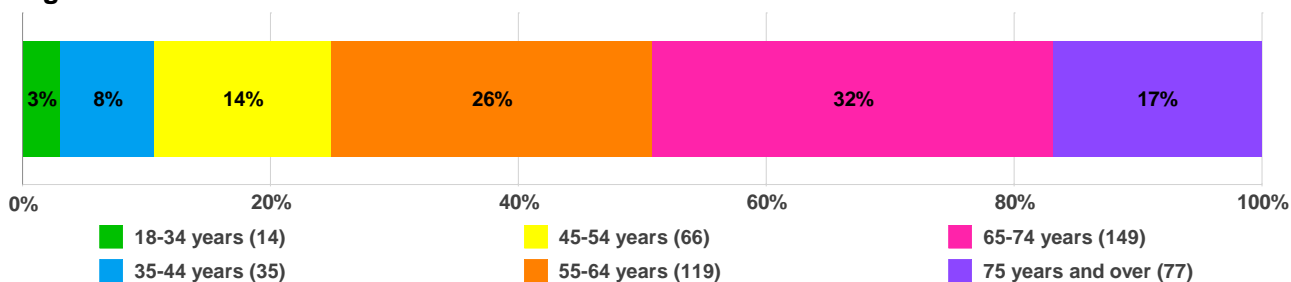
Miscellaneous Measures Additional Comments		
Theme	No.	Nature
		Remove traffic from the town centre.
Safety	5	Need safer bus shelters. Need safe cycle routes. Consider pedestrian safety (uneven & narrow pavements, appropriate crossing points). EV scooters on pavements are a safety issue.
Other	5	Unable to give an opinion further information needed. Wood burning stoves need to be addressed. Will Parish Councils be able to request air monitoring if they feel there is a need? Do not support the 'Great Reset'.
EVs	2	Charging points need to be reliable and maintained. Implications needed for non-electric vehicles using bays designated for EVs (i.e., those with chargers).

Demographics

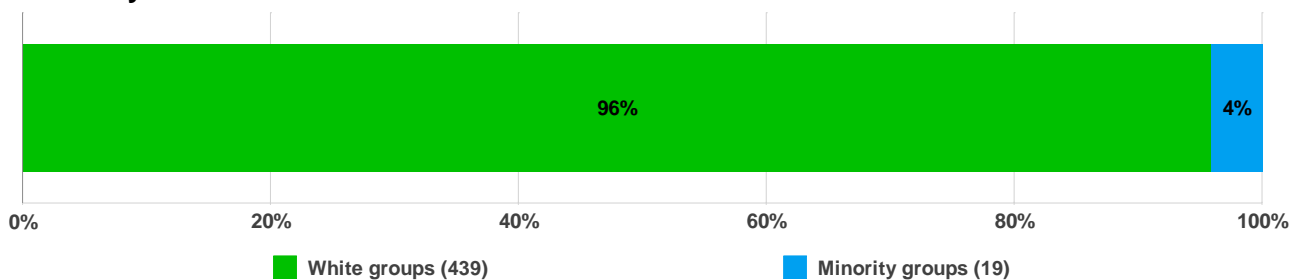
Gender



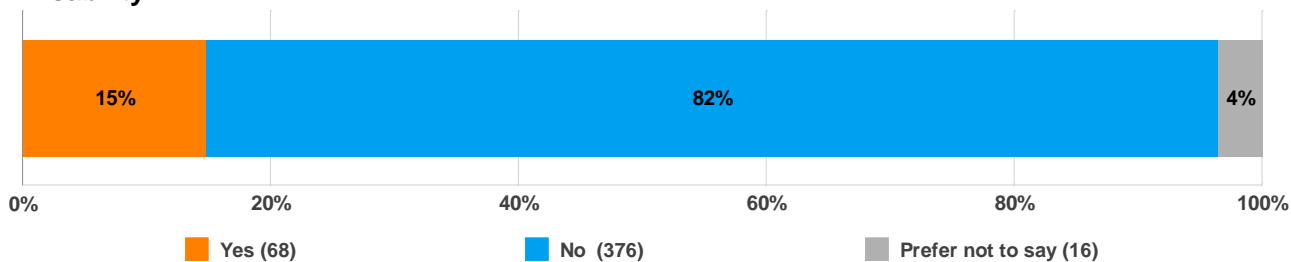
Age



Ethnicity



Disability





Maidstone Borough Council Air Quality Action Plan

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management

Date September 2023

Local Authority Officer	Dr Stuart Maxwell
Department	Environmental Health
Address	Maidstone House King Street Maidstone ME15 6JQ
Telephone	01622 602216
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Report Reference number	Maidstone Air Quality Action Plan
Date	September 2023

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Maidstone Borough Council between 2023 and 2028.

This action plan replaces the previous action plan (the Low Emission Strategy) which ran from 2018-2023. Projects delivered through the past action plan include:

- A major review of possible measures to improve air quality in Upper Stone Street. This review considered a large number of measures which might improve air quality in Upper Stone Street but the result of this consideration suggested that none of the measures would not bring forward compliance with the annual mean objective for NO₂ significantly and that with some of the measures, there was a danger of simply displacing the air quality issues in Upper Stone Street to a different location. Also, the cost of some of the measures would have been prohibitive.
- Introduction of variable off-street parking charges to make car parks further out of town more attractive.
- Tightening waiting and loading restrictions in Upper Stone Street. Single yellow lines have been replaced with double yellow lines, and loading restrictions were also increased (no loading between 7:00am to 8:00pm).
- Improved maintenance of Council owned EV charging points with daily inspection routine.
- Delivering our Clean Air For Schools (CAFS) programme and the associated DEFRA funded 'Pollution Patrol' Project.

Figure 1:- Anti-idling sign based on Pollution Patrol Artwork



- Updated Planning Guidance
- Review of Air Quality Monitoring Provision in Maidstone. The outcome of this review was that continuous monitoring was installed in Upper Stone Street, which included monitoring of PM_{2.5} for the first time in Maidstone, in addition to monitoring of NO₂ and PM₁₀.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with

equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2}.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion³. Maidstone Borough Council is committed to reducing the exposure of people in Maidstone Borough to poor air quality in order to improve health.

We have developed actions that can be considered under five broad topics:

- Policy guidance and development control
- Promoting low emission transport
- Public information
- Traffic management
- Vehicle fleet efficiency
- Promoting travel alternatives
- Alternatives to private vehicle use

Our priorities are

- Priority 1 – Improvements to bus fleet. Modelling has shown that the number of receptors in an exceedance of the NO₂ annual mean objective could be reduced from 27 in 2022 to 18, by restricting the buses operating on Upper Stone Street to Euro VI class, via the Enhanced Partnership Scheme Monitoring Groups (EPSMGs) and the District Focus Groups which have replaced the Quality Bus Partnership.
- Priority 2 – Improved traffic flow in AQMA – by exploring the expansion of parking restrictions to neighbouring roads.
- Priority 3 – Public information – via our two DEFRA funded projects, and anti idling campaign.
- Priority 4 – Application of MBC policy – ensure that MBC policies are updated and designed to either improve air quality or to prevent worsening of air quality by inappropriate development. This will be predominantly via the councils emerging Design and Sustainability DPD
- Priority 5 – Encourage improvement to EV charging provision – via review of councils own charging provision and potential incentives for uptake by residents.

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are many air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe),.

Responsibilities and Commitment

This AQAP was prepared by the Environmental Health Department of Maidstone Borough Council with the support and agreement of the following officers and departments:

- Kent County Council (Various Teams)
- MBC Development Management Team
- MBC Planning Policy Team
- MBC Parking Services Team
- MBC Biodiversity and Climate Change Team
- Local Council Members

This AQAP has been approved by:

Maidstone Borough Council Corporate Leadership Team

Maidstone Borough Council Communities, Housing and Environment Policy Advisory Committee

Maidstone Borough Council Cabinet

This AQAP will be subject to an annual review, appraisal of progress and quarterly reporting to the steering group set up to monitor progress. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Maidstone Borough Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Dr Stuart Maxwell at:

EHadmin@midkent.gov.uk

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1 Introduction

This report outlines the actions that Maidstone Borough Council will deliver between 2023-2028 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to Maidstone Borough Council's administrative area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Maidstone Borough Council's air quality ASR.

2 Summary of Current Air Quality in Maidstone Borough

Please refer to Maidstone Borough Council's 2023 ASR

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas^{4,5}.

The mortality burden of air pollution within the UK is equivalent to 28,000 to 36,000 deaths at typical ages⁶, with a total estimated healthcare cost to the NHS and social care of £157 million in 2017⁷.

Maidstone is the county town of Kent. Kent is the most populous County Council area in the Southeast Region. There are currently estimated to be 1,578,500 people living within the Kent County Council area. The population of Kent increased from 1,466,500 in 2011 to 1,578,500 in 2021, which was an increase of 7.64%. In the same period, the population of Maidstone increased from 155,800 to 176,700 people, based on figures from Kent County Council, making it the largest population of any Local Authority in Kent. This represented an increase of 13.45%, which was also the largest population increase in real terms of all the local authorities in Kent. Maidstone's population is expected to increase to 189,800 by 2030. Around 17,600 new homes are to be provided within the planning period 2011 to 2031. The Borough is home to 11.2 per cent of the population of the Kent County Council area (2021 estimate from KCC website) and borders Swale, Ashford, Tunbridge Wells and Tonbridge and Malling Boroughs, as well as Medway Unitary Authority.

The Borough of Maidstone includes the large urban area of Maidstone as well as several small rural settlements. Its countryside, set within 'the Garden of England', is of a high landscape quality and includes the Kent Downs Area of Outstanding Natural Beauty.

⁴ Public Health England. Air Quality: A Briefing for Directors of Public Health, 2017

⁵ Defra. Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

⁶ Defra. Air quality appraisal: damage cost guidance, July 2020

⁷ Public Health England. Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report, May 2018

Maidstone Borough Council

The main source of air pollution in the Borough is traffic emissions from major roads. An Air Quality Management Area (AQMA) was declared in August 2008 which incorporated the whole Maidstone urban area and the M20 corridor, where exceedances of the annual mean objective for nitrogen dioxide (NO₂) and 24-hour mean objective for fine particulate matter (PM₁₀) were predicted. This was replaced in 2018 by a smaller AQMA which followed the carriageways of the main roads through the borough. This AQMA was declared solely on exceedances of the NO₂ annual mean objective, and was in turn replaced by the current AQMA in 2022.

Maidstone Borough Council currently operates two automatic (continuous) monitoring stations. These are a roadside site in Upper Stone Street which monitors NO₂, PM₁₀ and PM_{2.5} and a rural background site in Detling which monitors NO₂ and PM₁₀. The <https://kentair.org.uk/data/data-selector> page presents automatic monitoring results for Maidstone Borough Council, with automatic monitoring results also available through the [UK-Air website](#).

In 2022 MBC also monitored NO₂ by diffusion tube at 57 different locations, which means that in total we have now monitored at more than 150 locations in the Borough. 2022 was the first year since 2019 in which NO₂ levels were not affected by COVID restrictions. NO₂ levels were broadly very similar to those in 2021, and well below 2019 levels. All LAQM air quality objectives were met at all locations across the Borough, with the exception of in the Upper Stone Street AQMA where the NO₂ annual mean objective was exceeded. All other LAQM objectives were met in Upper Stone Street. In Upper Stone Street, all of the monitoring sites remained above the NO₂ annual mean objective including Maid 123 which recorded 40.9µgm⁻³, which had previously fallen below the objective in the COVID affected years of 2020 and 2021. Only one site exceeded 60µgm⁻³ in 2022, namely Maid 96, which at 62.5µgm⁻³ was slightly down on the 2021 level of 62.6µgm⁻³.

The annual mean level of NO₂ recorded by the automatic monitoring station in Upper Stone Street in 2022 was 47µgm⁻³; slightly lower than the level in 2021 which was 49µgm⁻³. The 2019, pre-pandemic level at the automatic monitoring station was 68µgm⁻³.

During 2022, exceedances of the NO₂ annual mean AQS objective were recorded at seven non-automatic monitoring sites, all of which were located within the Maidstone Borough AQMA. These included six sites at which exceedances were measured in 2020 and 2021. The seven sites were:

- Maid 53 at The Wheatsheaf Public House.
- Maid 81 at The Pilot on Upper Stone Street;
- Maid 96 at Lashings Sports Club on Upper Stone Street.
- Maid 116 at 37 Forstal Road Cottages
- Maid 122 at Papermakers Arms PH, Upper Stone Street
- Maid 123 Upper Stone Street, opposite Maid 122
- Maid 128 Triplicate co-location site with continuous monitoring station in Upper Stone Street.

Levels at Maid 53, Maid 81, Maid 96, Maid 116 and Maid 128 showed a slight decrease compared to 2021 levels, whereas levels at the Maid 122 and Maid 123 had slightly increased. Four of these seven sites, (Maid 53, Maid 116, Maid 123 and Maid 128) were below the objective once distance corrected to the nearest relevant receptor as shown in Table B1. The Wheatsheaf was scheduled for demolition in 2021. Although the demolition has been delayed and we are unsure when it will happen, the property remains empty, so not a cause for concern in air quality terms. Overall, following distance correction, 3 sites remained above the objective, all in Upper Stone Street.

Figure 2: View of Upper Stone Street Looking Uphill (South) with AQ Station on the Right



AQC's detailed assessment report, undertaken in 2021 and based on 2019 (pre-pandemic data, confirmed that the previous Maidstone Borough AQMA could be revoked, with the only remaining area of exceedance being in Upper Stone Street, between Wrens Cross and Old Tovil Road. The annual mean objective for NO₂ applies primarily at residential property. It was estimated that the previous Maidstone Borough AQMA contained some 1400 residential properties. AQC's report suggests that in 2019 there were only 44 residential properties in an exceedance of the NO₂ annual mean objective, all of which were in Upper Stone Street and that these properties would need to remain in an AQMA when the Maidstone Borough AQMA

was revoked. Of these 44 residential receptors 35 are in the range 40 to 60 $\mu\text{g}\text{m}^{-3}$ and a further 9 are at a level of over 60 $\mu\text{g}\text{m}^{-3}$.

AQC also modelled a scenario for 2022, which concluded that without any intervention, the number of receptors experiencing an exceedance of the NO₂ annual mean objective would reduce from 44 to 27, of which an annual mean concentration of 60 $\mu\text{g}/\text{m}^3$ is exceeded at approximately three of those receptors. As shown in Table A3, the NO₂ annual mean level measured at the air quality monitoring station in Upper Stone Street decreased from 68 in 2019 to 47 in 2022.

Maidstone Borough Council, following the findings of AQC's detailed assessment, revoked the Maidstone Borough AQMA on 1st December 2022, and on the same date, declared a new small AQMA in Upper Stone Street. The relevant orders are shown below.

**ENVIRONMENT ACT 1995 PART IV SECTION 83(2)(b) AS AMENDED
BY ENVIRONMENT ACT 2021**

MAIDSTONE BOROUGH COUNCIL

AQMA REVOCATION ORDER (2022)

**MAIDSTONE BOROUGH COUNCIL, IN EXERCISE OF THE POWERS CONFERRED
UPON IT BY SECTION 83(2)(b) OF THE ENVIRONMENT ACT 1995, HEREBY
MAKES THE FOLLOWING ORDER.**

- 1** This order shall revoke the Maidstone Borough Air Quality Management Area [2018]
- 2** The order shall come into force on 1st December 2022

**THE COMMON SEAL OF MAIDSTONE BOROUGH COUNCIL WAS HERETO
AFFIXED ON 8 DECEMBER 2022 AND SIGNED IN THE PRESENCE OF CLAUDETTE
VALMOND ON BEHALF OF SAID COUNCIL**


AUTHORISED SIGNATORY



192163

**ENVIRONMENT ACT 1995 PART IV SECTION 83(1) AS AMENDED BY
ENVIRONMENT ACT 2021**

MAIDSTONE BOROUGH COUNCIL

AQMA ORDER

**MAIDSTONE BOROUGH COUNCIL, IN EXERCISE OF THE POWERS CONFERRED
UPON IT BY SECTION 83(1) OF THE ENVIRONMENT ACT 1995, HEREBY MAKES
THE FOLLOWING ORDER.**

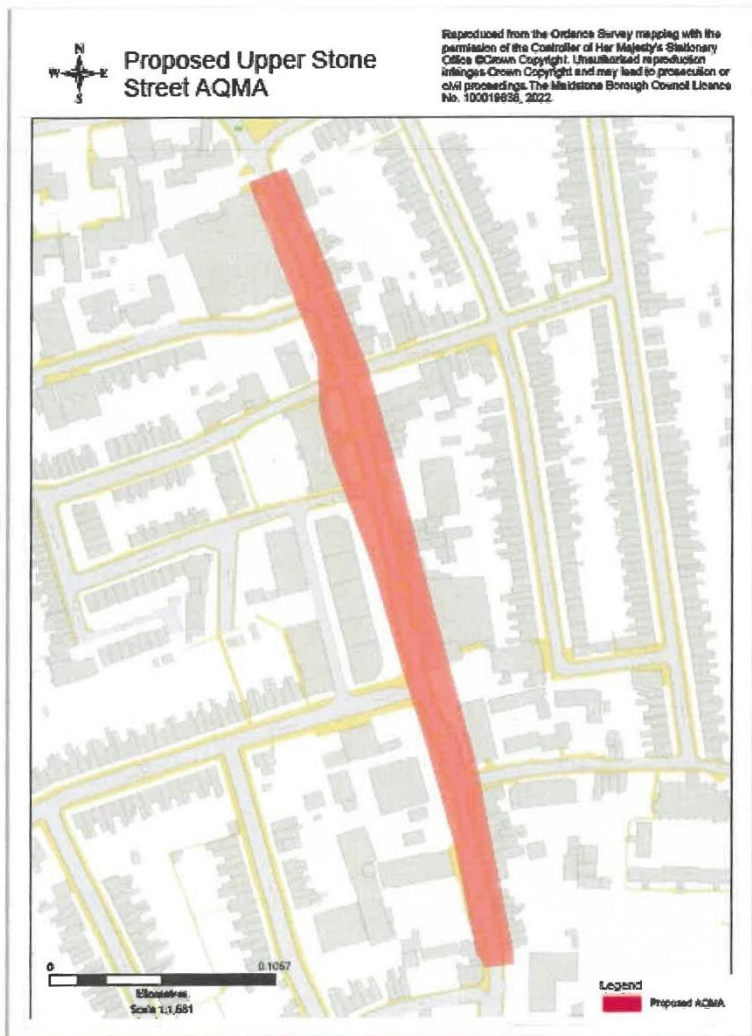
This Order may be cited as the Maidstone Upper Stone Street Air Quality Management Area (2022) and shall come into effect on 1st December 2022. The area shown in red on the attached map "Proposed Upper Stone Street AQMA" is to be designated as an air quality management area (the designated area). The designated area incorporates the stretch of Upper Stone Street between Wrens Cross and Old Tovil Road. This Area is designated in relation to a breach of the nitrogen dioxide (annual mean) objective as specified in the Air Quality Regulations 2000. This Order came into force on 1 December 2022 and shall remain in force until it is varied or revoked by a subsequent order.

**THE COMMON SEAL OF MAIDSTONE BOROUGH COUNCIL WAS HERETO
AFFIXED ON 8 DECEMBER 2022 AND SIGNED IN THE PRESENCE OF CLAUDETTE
VALMOND ON BEHALF OF SAID COUNCIL.**


AUTHORISED SIGNATORY



192154



[Handwritten Signature]
AUTHORISED SIGNATORY



3 Maidstone Borough Council's Air Quality Priorities

3.1 Public Health Context

As detailed in Policy Guidance LAQM.PG22 (Chapter 8), local authorities are expected to work towards reducing emissions and/or concentrations of PM_{2.5} (particulate matter with an aerodynamic diameter of 2.5µm or less). There is clear evidence that PM_{2.5} has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

New (2021) data from the Public Health Outcomes Framework (indicator D01) indicates that for the fraction of deaths, attributable to PM_{2.5}, in Maidstone Borough is 5.3%. This is lower than the national average of 5.5%.

We note that in Maidstone, annual mean PM_{2.5} levels measured in Upper Stone Street, which has the highest levels of pollution in the Borough, remained at 14µgm⁻³, which was the same level as it was in 2021. We believe that the Covid pandemic may have had some impact on pollution levels in the early part of 2021, but that this was not the case in 2022, which we regard as the first year unaffected by Covid since 2019. The PM_{2.5} level in Upper Stone Street in 2019 was 18µgm⁻³. We note that the level is required to be below the objective of 10µgm⁻³ by 2040.

3.2 Planning and Policy Context

Maidstone's Local Plan Review (covering the period from 2021 to 2038) is at an advanced stage and provisionally scheduled for adoption in late 2023. Once adopted, it will replace the current Maidstone Borough Local Plan 2011 - 2031 and carry full weight in determining planning applications.

The Local Plan Review policies relevant to air quality include:-

- Policy LPRTRA1 Air Quality, development that might affect air quality,
- Strategic Policy LPRSP14(C) Climate Change
- Policy LPRSP12 Sustainable Transport,
- Policy LPRTRA4 Parking

- Policy LPRTRA2 assessing transport impacts of development.

The Design and Sustainability DPD is currently being prepared. This document contains more detailed guidance on issues including, but not limited to, air quality mitigation, sustainable construction and biodiversity and green infrastructure. The emerging sustainability DPD is approaching regulation 19 consultation stage, following which it will be submitted to the Secretary of State and will be subject to an examination in public. If found sound and adopted, it will form part of the development plan for the borough and will have same weight as the local plan review in decision making.

Maidstone Borough Council declared a Climate Change and Biodiversity Emergency in 2019; following this, the Council prepared a Biodiversity and Climate Change Strategy[1] which sets out how the Council will meet its ambition to achieve carbon neutrality by 2030; this strategy is supported by the Biodiversity and Climate Change Action Plan[1]. The Action Plan was reviewed and updated in April 2023 as part of the scheduled annual review; a succinct version of the revised action plan is published on the Council's website.

<https://climatechange.maidstone.gov.uk/home/our-biodiversity-and-climate-change-action-plan>

3.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within Maidstone Borough Council's area.

A source apportionment exercise was carried out by Maidstone Borough Council in 2020, looking specifically at emissions sources in Upper Stone Street. This identified that within the AQMA, the percentage source contributions were as follows

Table 3.1: Percentage Source Contribution at Various Receptors

Vehicle Type	NO _x	PM ₁₀	PM _{2.5}
Petrol Cars	5.0%	28.7%	25.8%
Diesel Cars	36.6%	31.1%	32.7%
Petrol LGVs	0.0%	0.2%	0.2%
Diesel LGVs	19.3%	14.2%	13.8%
Rigid HGVs	15.9%	9.7%	10.3%
Artic HGVs	6.4%	7.4%	7.5%
Buses/Coaches	16.4%	7.1%	8.2%
Full Hybrid Petrol Cars	0.1%	1.1%	1.0%
Plug-In Hybrid Petrol Cars	0.0%	0.3%	0.3%
Full Hybrid Diesel Cars	0.2%	0.2%	0.2%
FCEV LGVs	0.0%	0.0%	0.0%
CNG Buses	0.0%	0.0%	0.0%
Hybrid Buses	0.1%	0.1%	0.1%
FCEV Buses	0.0%	0.0%	0.0%

Diesel cars are the biggest contributor to both NO₂ and PM pollution. The second largest contributor to NO₂ are buses, which is why we are especially keen to see some improvements to our bus fleet. Modelling has shown that the number of receptors exceeding the objective would be halved if only Euro VI buses were able to operate on Upper Stone Street. See Appendix C

3.4 Required Reduction in Emissions

The improvement in road NO_x emissions in order to meet the objective at modelled locations (as presented in the Detailed Assessment reference J10/12378A/10A/1/F3, dated 23rd February 2022), see Figure 3, where concentrations exceeded the objective in 2019, is shown in Table 2. As there were a relatively large number of

locations exceeding the objective, a handful have been chosen, including the worst-case location, which are representative of the area of exceedance. As set out in LAQM Technical Guidance TG22 paragraph 7.116 any required percentage reductions of local emissions should be expressed in terms of NO_x due to local road traffic. This is because the primary emission is NO_x and there is a non-linear relationship between NO_x concentrations and NO₂ concentrations. The following calculations use the ‘modelled NO₂ concentrations’ presented in the Detailed Assessment, and the methodology set out in TG22 Box 7.6. The ‘Road NO_x - current’ concentration has been modelled. The road NO_x concentration required to give a total NO₂ concentration of 40µg/m³ (road NO_x-required) has been calculated using the NO_x to NO₂ calculator by entering a total NO₂ concentration of 40µg/m³, along with the local background NO₂ concentration. The ratio of ‘road NO_x-required’ to ‘road NO_x-current’ gives the required percentage reduction in local road NO_x emissions to achieve the objective.

An 81% decrease in road NO_x emissions from 2019 is required to meet the objective at the worst-case modelled location. However, as noted in the Detailed Assessment, the model is considered to over-predict concentrations at the junction of Upper Stone Street, Knightrider Street, Mote Road and Lower Stone Street (where the worst case modelled receptor 37 is located) and conversely slightly under-predict at the section of Upper Stone Street between Brunswick Street and Old Tovil Road. Therefore the percentage reductions required should be used as indicative to those required to achieve the objective based on 2019 modelled concentrations.

Table 2.2: Percentage Decrease in Road NO_x required to Meet Annual Mean NO₂ Objective at Relevant Modelled Receptors (µg/m³) in 2019

Receptor	Annual Mean Contribution (µg/m ³)					% Decrease in Road NO _x to Meet Objective
	Modelled NO ₂ Concentration	Road NO _x - Current (a)	Road NO _x – Required (b)	Background NO ₂ (for information)	Difference between a and b ^c	
6 ^a	71.3	124.7	43.7	18.6	81.0	65
17 ^a	68.9	117.6	43.7	18.6	73.9	63
37 ^b	106.9	235.4	43.7	18.6	191.7	81
87 ^b	57.6	86.8	43.7	18.6	43.1	50

91 ^b	64.0	112.0	50.8	15.2	61.2	56
190 ^b	57.6	86.6	43.7	18.6	42.9	50

^a modelled at 4.5m

^b modelled at 1.5m

^c based on unrounded numbers

Figure 3: Receptor Locations from Table 2



3.5 Key Priorities

- Priority 1 – Improvements to bus fleet. Modelling has shown that the number of receptors in an exceedance of the NO₂ annual mean objective could be reduced from 27 in 2022 to 18, by restricting the buses operating on Upper Stone Street to Euro VI class, via the Enhanced Partnership Scheme Monitoring Groups (EPSMGs) and the District Focus Groups which have replaced the Quality Bus Partnership.
- Priority 2 – Improved traffic flow in AQMA – by exploring the expansion of parking restrictions to neighbouring roads.
- Priority 3 – Public information – via our 2 DEFRA funded projects, and anti idling campaign.

- Priority 4 – Application of MBC policy – ensure that MBC policies are updated and designed to either improve air quality or to prevent worsening of air quality by inappropriate development.
- Priority 5 – Encourage improvement to EV charging provision – via review of councils own charging provision and potential incentives for uptake by residents.

4 Development and Implementation of Maidstone Borough Council’s AQAP

4.1 Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 4.1. In addition, we have undertaken the following stakeholder engagement:

- Web based survey
- Press releases to local media organisations
- Emails to statutory consultees

The response to our consultation stakeholder engagement is given in Appendix A.

Table 4.1 – Consultation Undertaken

Yes/No	Consultee
Yes	the Secretary of State
Yes	the Environment Agency
Yes	the Highways Authority
Yes	all neighbouring local authorities
Yes	other public authorities as appropriate, including UK Health Security Agency and National Highways
Yes	bodies representing local business interests and other organisations as appropriate

4.2 Steering Group

MBC has established a steering group in order to develop the Air Quality Action Plan.

The steering group comprised representatives from

Kent County Council Highways Team

KCC Public Transport Team

KCC Arboriculture Team

MBC Development Management Team

MBC Planning Policy Team

MBC Parking Services Team

MBC Biodiversity and Climate Change Team

Elected Councillors for the ward within the AQMA

Lead member for Environment

The group held a series of meetings between April and December 2022, in order to develop the list of actions to be included in the consultation which was held during December 2022 and January 2023. Following the consultation, the group was convened to discuss the outcomes of the consultation and agree the final actions to be taken forwards. The group will continue to meet quarterly for the life of the action plan to monitor progress and discuss any new actions or modifications to the plan.

5 AQAP Measures

Table 5.1 shows the Maidstone Borough Council AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

NB: We have been advised by our AQ consultant, that in most cases, our actions are not suitable for modelling, since this would necessarily have to be based on several assumptions. As we work through the measures in detail, we will make a judgement at that time about whether modelling is possible or worthwhile. In Table 5.1 below, we have estimated the relative size of the impact we expect the measures to have, with three ticks representing the greatest impact, and one tick representing the smallest impact. Please see future ASRs for regular annual updates on implementation of these measures

Table 5.1 – Air Quality Action Plan Measures

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
	Title	Select from the categories in blue box	Select from the subcategories in blue box		Date	Date				Date	
1	Engage with bus service providers to encourage improvement to bus fleet in Maidstone, with special emphasis on services operating on Upper Stone Street	Vehicle Fleet Efficiency	Promoting Low Emission Public Transport	KCC MBC	2024	2025-2028	%of Euro 6 Buses in AQMA	✓✓✓	NA	2028	Current modelling suggests that this measure will almost halve the number of receptors in the AQMA. We will update this modelling in due course to include an up-to-date look at the overall AQMA, and at when compliance with AQ objectives can be expected.
2	Explore expansion of the additional parking restrictions already introduced on Upper Stone Street to include adjacent roads such as Palace Avenue and Knightrider Street	Traffic Management	Parking Enforcement on Highway	MBC	2024	2025-2028	Additional parking restrictions introduced as appropriate	✓	NA	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
3	Review of Air Quality Guidance to reflect updated air quality information via Local Plan Review and Design and Sustainability DPD	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	MBC	Ongoing	2024 onwards	Local Plan review completed DPD adopted	✓	Local Plan review at advanced stage scheduled to be adopted in late 2023. DPD at rg 19 stage.	End 2024	Not possible to model impact of measure as do not know the outcome of the policy review is. Can be modelled as the action progresses and options are established for consideration by the appropriate committee
4	Review of Taxi Policy	Promotion of Low Emission Transport	Taxi Licensing Conditions	MBC	TBC	2023-2028	Improvement to taxi fleet	✓	NA	2028	Not possible to model impact of measure as do not know the outcome of the policy review is. Can be modelled as the action progresses and options are established for consideration by the appropriate committee
5	Information Campaign to residents of the new AQMA	Public Information	Other	MBC	2024	2024 to 2028	All residents of AQMA have been provided with relevant information on an ongoing basis	✓	NA	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
6	Extension to the Clean Air For Schools (CAFS) programme, with emphasis on roll-out of the Pollution Patrol Resource	Public Information	Via other mechanisms	MBC	Ongoing	Ongoing until 2028	Number of schools signed up to Pollution Patrol in Kent	✓	Approx 50 schools	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.
7	Prioritise the AQMA and surrounding areas for roll out of new DEFRA funded Health Professionals AQ resource.	Public Information	Via other mechanisms	MBC	Ongoing	2024	Number of health care professionals using the resource	✓	Procurement nearing completion	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.
8	A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas	Public Information	Via other mechanisms	MBC	Ongoing	2028	Number of anti-idling signs installed	✓	Approx 20 signs in identified hot spots	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.
9	Consider discount on resident's parking for EV vehicles.	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	MBC	2024	2025	Council decision on giving discount made	✓	NA	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
10	Review provision of EV parking in Council car parks	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	MBC	Ongoing	2025-2028	Amount of alternative refuelling provision	✓	NA	2028	Currently provision exceeds demand however this will be kept under review as demand increases.
11	Continuation of MBC sponsorship of the Walk on Wednesday Scheme	Public Information	Via other mechanisms	MBC	Ongoing	Ongoing	Sponsorship continued for life of action plan	✓	£2500 given annually to sponsor scheme	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.
12	Work with KCC to ensure that potential for appropriate and beneficial tree planting is completed on Upper Stone Street	NA	NA	KCC	Ongoing	Ongoing	Number of trees planted	✓	6 trees planted in suitable location	2028	Not possible to model impact of measure as unquantifiable. Would not be a prudent use of scarce resources that could be better spent on implementation of actions.
13	Identify and bid for any grant funding for suitable projects.	NA	NA	MBC	Ongoing	Dependant on schedule of bid window	Bid submitted	✓	Currently implementing projects from two successful bids	2028	Impact will depend on the nature of each individual project. Modelling on a bid specific basis in support.

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
14	Explore the use of new and novel solutions that may reduce the impact of pollution on Upper Stone Street	NA	NA	MBC	Ongoing	Ongoing	Novel solutions considered as appropriate	✓	One considered to date "roadvent"	2028	Roadvent project considered but difficulties around installation and ongoing operational costs could not be resolved.

Appendix A: Response to Consultation



ABSTRACT

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Introduction

Air Quality Action Plans are the mechanism by which local authorities, in collaboration with national agencies and others, state their intentions for working towards air quality objectives through the use of the powers they have available.

A draft Air Quality Action Plan (AQAP) was produced in September 2022 as part of the Council's duty to improve local air quality. It outlines the actions MBC will undertake to improve air quality in the borough between 2023 and 2028.

Methodology

Maidstone Borough Council undertook a consultation between 28 November 2022 and 29 January 2023.

The survey was carried out online with a direct email to those on the Council's consultation mailing list. It was also promoted through the Council's social media channels. Paper copies of the survey and alternative formats were available on request. The survey was open to all Maidstone Borough residents aged 18 years and over and visitors to the borough.

Respondents were asked their opinions about the proposed actions for the Air Quality Management Plan. There was opportunity throughout to provide additional comments.

There was a total of 471 responses to the survey and a letter commenting on the proposed actions was received from KCC (attached at Appendix A).

The data has not been weighted; however, the bottom two age brackets were combined to create the 18 to 34 years group. Please note not every respondent answered every question; therefore, the total number of respondents, refers to the number of respondents for that question, not to the survey overall. Comments have been categorised according to content with some covering more than one category.

Transport Measures

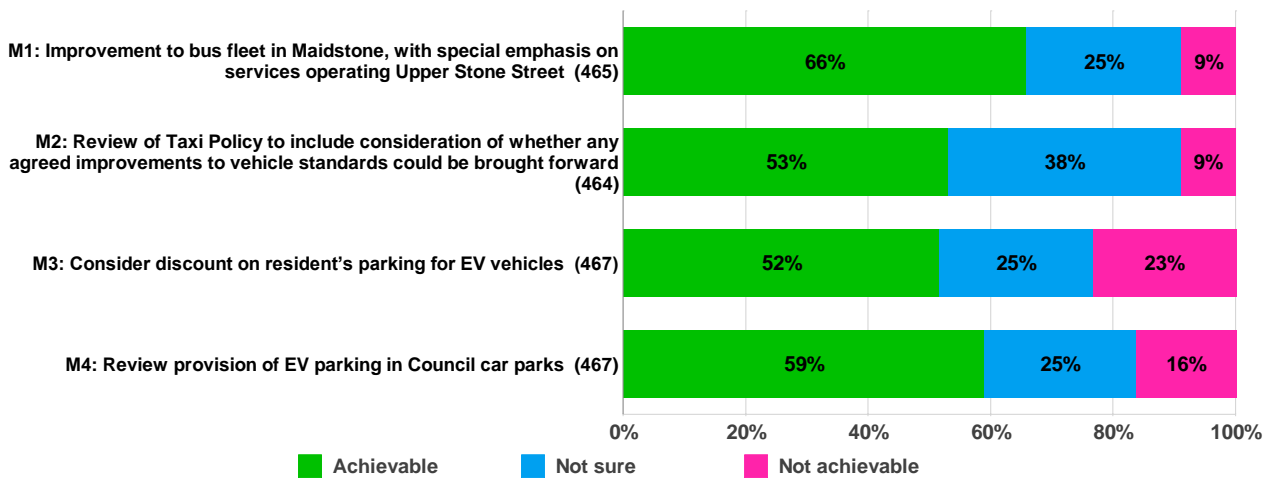
Achievability of Transport Measures

Respondents were asked to review the proposed transport measures and were asked if they were achievable or not.

A total of 467 respondents answered these questions.

Overall, Measure 1, 'Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street' was considered to be the most achievable with 66% responding this way.

Measure 3, 'Consider discount on resident's parking for EV' was considered the least achievable with the greatest proportion answering 'not achievable' across the transport measures. 23% of respondents answered this way and the lowest proportion stating it was achievable at 52%.



Demographic Differences

The data showed that there was a greater proportion of male respondents that felt Measure 3, 'consider discount on resident's parking for EV vehicles' was unachievable with 27% compared to 18% of female respondents.

Male respondents also had a greater proportion than female respondents that answered, Measure 4, 'review provision of EV parking in council car parks' was unachievable with 19% answering this way compared to 12% of female respondents.

Additional Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way. The comments are set out, by question, in the tables below:

Maidstone Borough Council

M1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street (40 Comments)		
Theme	No.	Nature
Traffic Flow	9	A bypass is needed. Redirect traffic from Upper Stone Street. Stationary traffic is the issue.
Public Transport doesn't meet needs	8	Bus services have been cut and services have been reduced. Services are unreliable. Will only work if there are dedicated bus lanes.
Cost	6	Who will pay for improvements to the fleet? Too expensive.
Little or no impact	6	Unconvinced measure will result in improvements to air quality. Buses have to use this route. Buses are in the minority of vehicles on the roads.
No control	6	The Council has no control over private bus fleet operators.
P&R	3	Condemnation over the cutting of P&R services.
Environmentally Friendly Buses	3	Why not hydrogen cell yet? Make all buses hydrogen or electric.
Other	2	Bring back trolley buses. Stop buses from idling.

M2: Review of Taxi Policy to include consideration of whether any agreed improvements to vehicle standards could be brought forward (34 Comments)		
Theme	No.	Nature
Impact on taxi drivers	18	Would make running a taxi unviable. Unfair on taxi operators. New EV Taxis are expensive.
Little or no impact	5	Taxis are not the issue. Taxis already at a high standard.
Cost of living/Cost of fares	4	This policy should not be brought forward as people are already struggling with the cost-of-living crisis. This will result in increased fares for taxi users.
Electric Vehicles	3	Need electric taxis. No infrastructure for electric vehicles. Issues recycling lithium batteries.
Other	3	This is outside the Council's remit. Taxi standards have declined (vehicles & driver skills). The technology is not available to implement this measure.
Uber	2	Will this include Uber drivers' vehicles? Invention of Uber means this can not be regulated.

M3: Consider discount on resident's parking for EV vehicles (99 Comments)		
Theme	No.	Nature
Unfair	34	This measure is unfair and discriminates against those who cannot have EVs. EV owners should not get any special treatment.
EV Expense	26	EVs are expensive.

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M3: Consider discount on resident's parking for EV vehicles (99 Comments)		
Theme	No.	Nature
		Majority of people cannot afford to buy an EV.
Space issues	9	Resident parking is at a premium. This will not improve situation as still more cars than spaces. There is not currently enough resident on-street parking.
Impact on Council finances	9	Waste of money as bigger priorities. Uncollected money is a lost for the Council. Council cannot afford to lose the revenue.
Too soon for EV	9	Wait five years for this measure when EVs will have improved (and more people have them). Electric shortages expected this year. Issues with recycling/disposing of EV batteries still need to be resolved.
Little to no impact	8	All vehicles pollute in some way (brake dust and rubber) and take up the same space. Measure does not meaningfully incentivise EV take up. Amount of EV vehicles too small to make an impact.
EV Infrastructure	6	Cost of installation will not be recoverable for several years. This measure will cost too much to implement. Wider infrastructure for EVs still requires investment to make it a viable alternative to petrol.
Traffic & Traffic Flow	3	Would be better addressing pinch point in traffic and improving/changing the one-way system. Queuing traffic/congestion needs to be addressed.
Parking charges	2	Should not have to pay to park outside your own house.
Other	2	Should be encouraging mode changes. Government has introduced road tax for EV due to loss of revenue.

M4: Review provision of EV parking in Council car parks (63 Comments)		
Theme	No.	Nature
Unfair	25	Creates preference system – EV owners should pay the same as everyone else. Unfair for EV owners to get special treatment.
Limited parking	15	Already a shortage of parking spaces. Current EV spaces not used.
EV Infrastructure	9	This measure is too expensive. There is a lack of wider infrastructure to support EVs.
Little to no impact	9	EVs still cause pollution (displaced to manufacturing process). Improvements to air quality arising from this measure likely to be negligible. EVs are in the minority of vehicles.
Other priorities	4	There currently are more important issues for MBCs budget than implementing this measure.
Deters visitors to Maidstone	4	Implementing this measure would deter people from visiting Maidstone. People will shop elsewhere if they cannot park.
Other	3	EVs expensive.

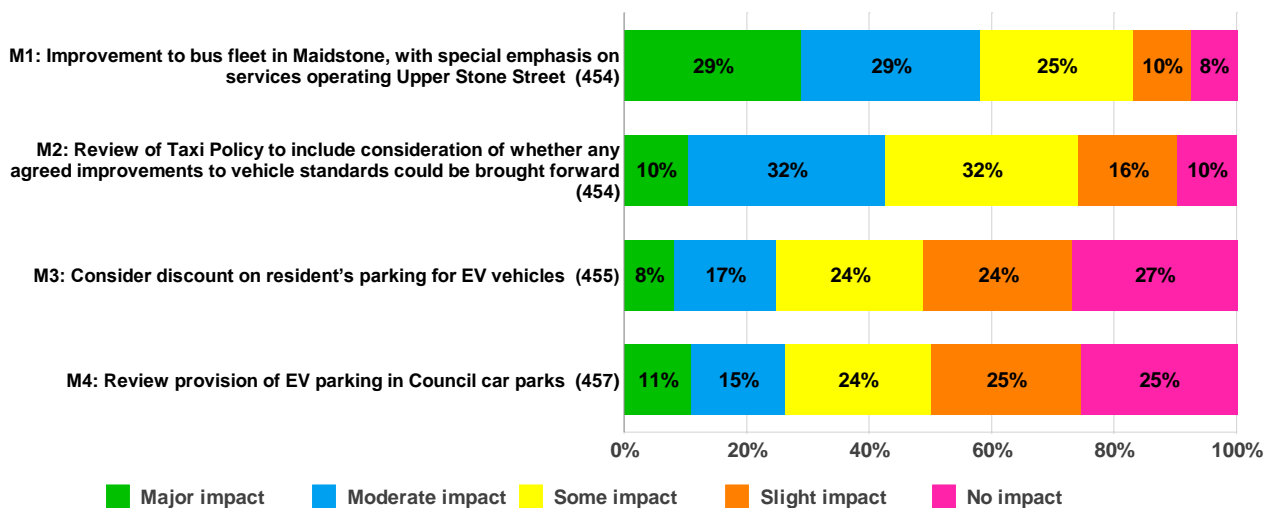
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		Vandalism would be an issue. EVs need long periods to charge (short charges impact on battery life).
Traffic Flow	2	Improve traffic flow by removing traffic lights and improving one-way system. Introduce enforceable speed limit for HGVs going through Harrietsham.

Impact of Transport Measure

Respondents were asked to indicate what impact they thought each of the measures would have on air quality locally.

A total of 457 respondents answered these questions. Overall, respondents felt that Measure 1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street, would have the greatest impact. 59% of respondents said that this would have a Major or Moderate impact. Respondents felt that Measure 3 Consider discount on resident’s parking for EV vehicles would have the least impact with 51% responding that this measure would have a slight impact or no impact.



Demographic Differences

The data show that a greater proportion of female respondents felt that measure 1: Improvement to bus fleet in Maidstone, with special emphasis on services operating Upper Stone Street, would have a major or moderate impact on air quality locally with 64% answering this way compared to 54% of male respondents.

There were no respondents aged 18 to 34 years that said that Measure 3: Consider discount on resident’s parking for EV vehicles, or Measure 4: Review provision of EV parking in Council car parks, would have a major or moderate impact.

A greater proportion of male respondents answered slight or no impact when asked about measure 3 with 57% responding this way compared to 42% of female respondents.

Male respondents also had a greater proportion responding slight or no impact when asked about measure 4 with 56% responding this way compared to 41% of female respondents.

Transport Measures General Comments

All respondents were given the opportunity to provide additional comments about the proposed Transport measures, a total of 172 comments were received.

Transport General Comments		
Theme	No.	Nature
Traffic Flow & Management	57	Congestion is the main issue. Remove traffic lights and create a bypass to improve air quality in the Town Centre. Create a Clean Air Zone. Prevent and enforce idling (Taxis and Busses in High Street).
Public Transport	48	Update all the buses. Improve public transport – cheaper and more frequent services. Make public transport more attractive to people.
EV Vehicles	36	EVs are expensive - financial incentives to buy could help take-up. Counterproductive – electricity is not generated in an environmentally friendly way. EVs are in the minority of vehicles on the roads. More Council charging points needed.
P&R	20	Bring back the P&R service. P&R will reduce the number of vehicles in the Town centre.
Active Travel	16	More bicycle lanes and secure storage in the Town centre. Encourage cycling with safe (& segregated routes). Improvement pavements.
Little to no impact	16	Trivial measures that will only have a marginal impact. These measures do not go far enough and will not impact pollution.
HGVs	11	Divert HGVs from the Town centre. Restrict HGVs traveling through Town. HGVs are the biggest polluters.
Development	9	Development has increased the number of vehicles on roads. Development is not supported by road and highways infrastructure upgrades. Stop building so many new homes.
Other Comments	5	Do not reduce the AQMA. Do not penalise petrol vehicle users. Protect green spaces. Measure would impact on Council revenues. Too many people are the real cause of pollution.

Transport General Comments		
Theme	No.	Nature
Behaviour Shift	4	Need more meaningful measures to facilitate a behaviour shift from private vehicles.
Other Areas	3	Upper Stone Street is not the only area of concern. These measures only relate to the Town Centre rather than villages.
More detail	3	Requests for more details on the proposed measures.
Suggestions	2	Introduce charges for commercial vehicles parking overnight. Remove all diesel vehicles registered before 2016.

Information & Education Measures

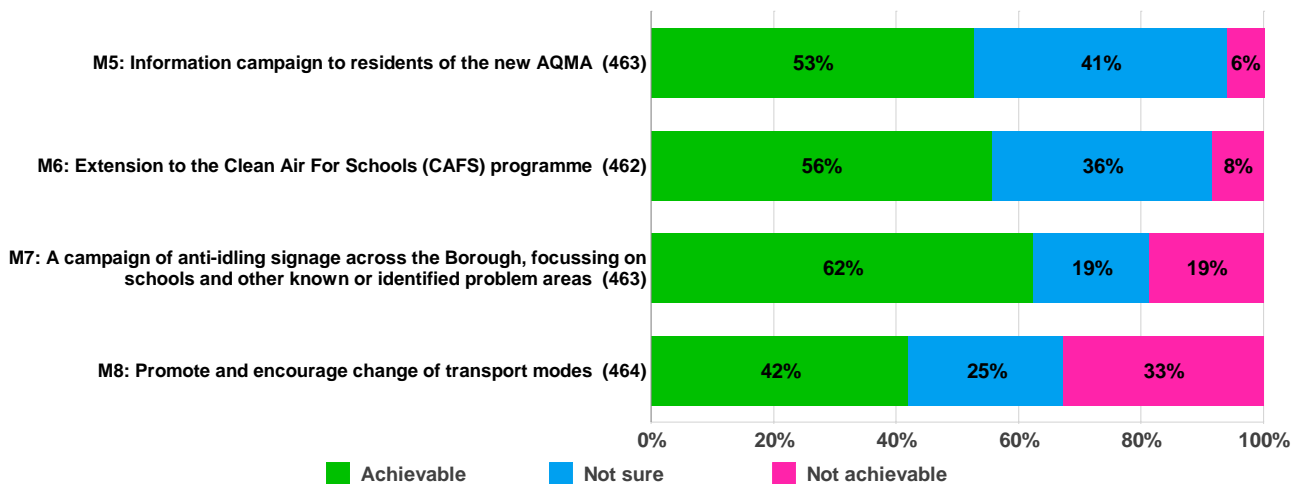
Achievability of Information & Education Measures

Respondents were asked to review the proposed information and education measures and were asked if they were achievable or not.

A total of 464 answered these questions.

Overall, Measure 7, ‘A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas’ was considered the most achievable with 62% responding this way.

Measure 8, ‘Promote and encourage change of transport modes’ was considered the least achievable with the greatest proportion of respondents answering ‘not achievable’ across the information and education measures with 33% answering this way and the lowest proportion stating it was achievable at 42%.



Demographic Differences

The data showed a greater proportion of female respondents felt that Measure 6, ‘Extension to the Clean Air for Schools (CAFS) programme’ was achievable with 62% answering this way compared to 51% of male respondents.

Respondents aged 18 to 34 years had the greatest proportion, across the age groups, that said Measure 6 was unachievable with 29% responding this way.

A greater proportion of female respondents answered that Measure 7, ‘A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas’ was achievable with 71% answering this way compared to 58% of male respondents.

A greater proportion of respondents from minority groups felt that Measure 8 ‘Promote and encourage change of transport modes’ was achievable with 67% answering this way compared to 41% of respondents from white groups.

Maidstone Borough Council

A greater proportion of female respondents answered that Measure 8 was achievable with 49% answering this way compared to 37% of male respondents.

Additional Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way. The comments are set out, by question, in the tables below:

M5: Information campaign to residents of the new AQMA (22 Comments)		
Theme	No.	Nature
Little to no impact	12	People don't pay attention to these campaigns. Will not change behaviour. People don't care about air quality.
Cost	7	This measure is a waste on money. This measure is too expensive.
Other	5	People will still need to get from A to B. The general public do not take their responsibility towards air quality seriously. EV infrastructure is not available yet.

M6: Extension to the Clean Air For Schools (CAFS) programme		
Theme	No.	Nature
Ignored	15	This measure will not have any impact as it will be ignored.
Cost	5	Don't waste money on pointless campaigns.
Discriminatory	4	This measure would be discrimination – people who don't have children and those that cannot afford EVs.
Logistics	3	Children do not live locally /in walking distance of their schools. Public transport is too unreliable for school transport.
Other	3	Stop making people use EVs. Areas of high pollution- around the Montessori School & Tonbridge Road (by College).
Enforcement	2	MBC can't enforce this. Schools can't enforce this.

M7: A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas		
Theme	No.	Nature
Ignored/Little to no impact	39	Will be ignored - particularly in cold and wet weather. Signage alone will make no difference and will be ignored. This measure is not significant enough to make a difference to air quality.
Enforcement	16	Without sanctions this is waste of money. This needs proper enforcement to work. This cannot be enforced.

M7: A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas		
Theme	No.	Nature
Traffic	14	The high volume of traffic on Maidstone's roads makes this measure ineffective. Structure of road system and network causing pollution. Improve traffic lights. Constant roadworks cause congestion.
Cost	9	This is a waste of money. Money for signs could be better spent elsewhere.
Newer vs Older vehicles	8	Many newer vehicles have automatic cut outs. Idling only an issue with older vehicles (and not everyone can afford to upgrade).
Other	4	Discourage people driving to schools. This aims to restrict movement and move to hybrid learning under the guise of climate change. Maidstone does little for pedestrians who are the most at risk of poor air quality.

M8: Promote and encourage change of transport modes (141 Comments)		
Theme	No.	Nature
Public transport	73	Public transport is unreliable and expensive. Many places do not have bus services. Bring back the P&R service. Bus services are being cut.
Behaviour change/Car Reliant	42	Cars are the only options – alternative are not viable. The car is the most convenient way to travel in Maidstone. Behaviour change impractical for many.
Active transport	17	More cycle lanes and footpaths away from roads needed. Older demographic unable to walk or cycle. Feels unsafe cycling in Maidstone.
EVs	10	EVs are too expensive for most – more purchase incentives required. EV charging network needs work.
Impact	9	Without enforcement or penalties measure will be ignored. The Council has no control in this area. Measure will have minimal impact on air quality.
Traffic & Traffic Management	7	Road are not big enough (and no space for trams or trolley buses). Need alternative routes to south of the Borough that bypass the town centre.
Development	6	Too many homes being built. New housing development are not served by public transport. Infrastructure has not kept up with development.
Cost	5	This is a waste of money. This measure would be expensive to implement. There are no available funds to support this measure.
Other	3	Need to set harder targets. Need more data on people modes of transport and journeys.

Maidstone Borough Council Air Quality Action Plan - 2023

		Run a school's bus service like in America.
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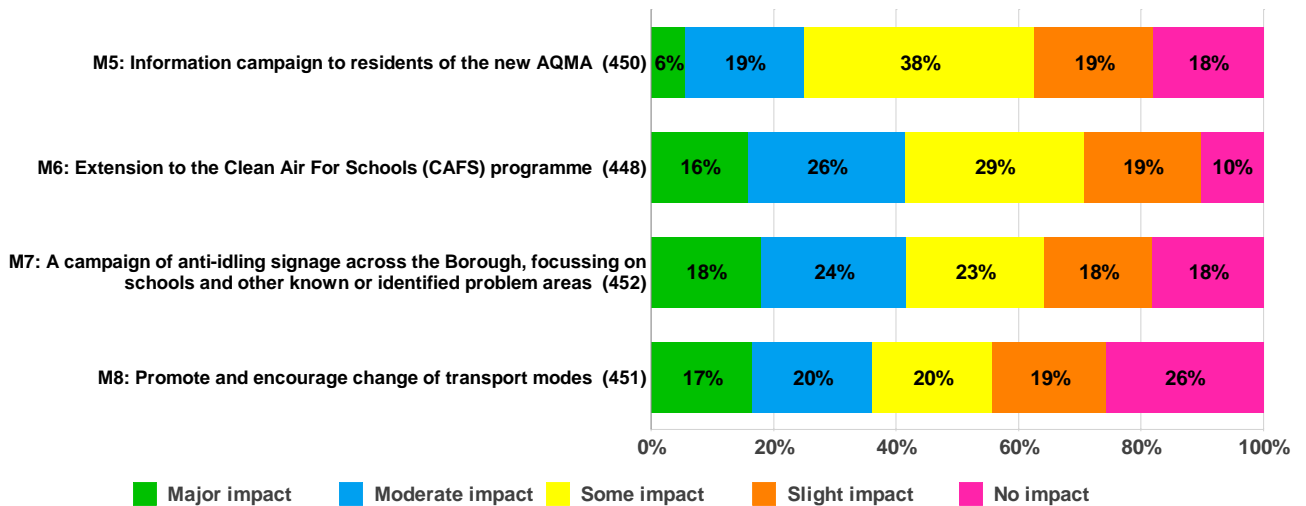
Impact of Information & Education Measures

Respondents were asked to indicate what impact they felt each of the measures would have on air quality locally.

A total of 458 respondents answered these questions.

Overall, respondents felt that Measure 7: A campaign of anti-idling signage across the Borough, focussing on schools and other known or identified problem areas would have the greatest impact with 42% responding Major or Moderate impact.

Respondents felt that Measure 8: Promote and encourage change of transport modes would have the least impact with 44% responding that this measure would have a slight impact or no impact.



Demographic Differences

The data show that a greater proportion of male respondents felt that measure 5: Information campaign to residents of the new AQMA, would have a only a slight impact or no impact on air quality locally with 43% answering this way compared to 28% of female respondents.

A greater proportion of female respondents felt that measure 6: Extension to the Clean Air For Schools (CAFS) programme, would have a only a major or moderate impact on air quality locally with 53% answering this way compared to 35% of male respondents.

A greater proportion of male respondents responded slight or no impact when asked about measure 7 with 42% responding this way compared to 26% of female respondents.

Maidstone Borough Council

A greater proportion of male respondents responded slight or no impact when asked about measure 8 with 51% responding this way compared to 32% of female respondents.

Information & Education General Comments

All respondents were given the opportunity to provide additional comments about the proposed Information & Education measures, a total of 115 comments were received.

Information & Education Measures Additional Comments		
Theme	No.	Nature
Impact	22	Measures are a waste of time and money. Promotion and encouragement will not be enough to get people on board. Measures will be ignored unless enforced. Measure will have little impact on air quality.
Schools Transport	20	Schools traffic is a significant contributor to air quality and congestion in Maidstone. Most children live too far away from their school to walk to cycle. Walking & cycling in some rural areas is dangerous for children. Cycling classes in schools would help normalise cycling. Encourage schools to encourage their pupils to use active transport methods and public transport.
Traffic	19	Focus on improving traffic flow. Review traffic lights to reducing queuing. Maidstone needs a by-pass or ring road.
Idling	17	Anti-idling signage will not work unless it is enforced. Anti-idling should apply to buses and HGVs. Anti-idling campaigns around schools should be wider than just the road that the school is on.
Behaviour	11	Promote car sharing and travelling off-peak. Measures need to be easy to achieve or they will be ignored. Behaviour changes difficult without incentives and sanctions.
Active Transport	7	Maidstone is walkable but pedestrians are exposed to high levels of pollution. Improve provisions for cycling. Promote cycling and walking.
EVs	7	EVs are not affordable for most residents. Do more to support residents change to EV by supporting resident to install or installing EV chargers on residential streets.
Air Quality Data	7	More information requested on details of the proposals. Data being used to evidence AQMA is flawed.
Park & Ride	6	Should not have cut the P&R services.
Car Alternatives	6	There are no alternatives that are as convenient or cost effective as travelling by car.
Suggestions	5	More tree and bushes. Scrappage grants for older and diesel vehicles.

Information & Education Measures Additional Comments		
Theme	No.	Nature
		Consider electric scooters (subject to standards) as an alternative mode of transport (particularly for school children). Use of smaller vans and commercial vehicles at peak times (Ashford model).
Development	4	Extra vehicles on the town's roads are due to extensive house building in the borough. Development has created out of town estates that are reliant on the car.
Other	3	No backdoor taxation for road users. Wood burning stoves contribute to poor air quality. Lobby for top tier authorities with highways responsibilities to be responsible for AQMAs.

Miscellaneous Measures

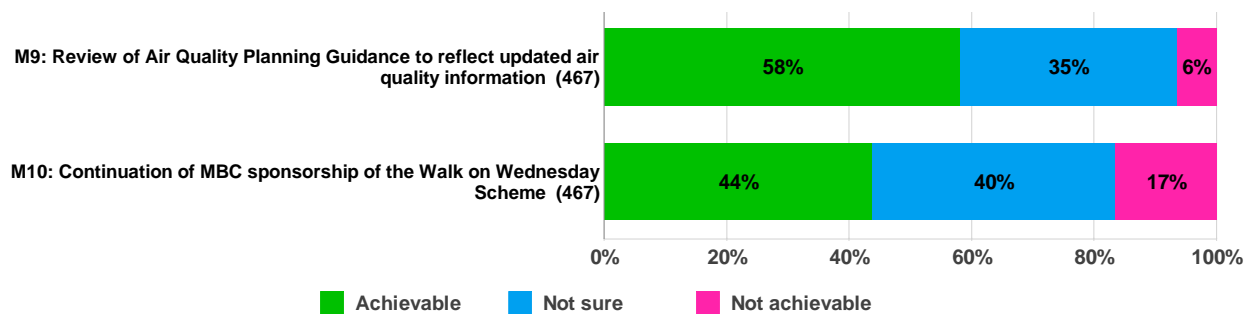
Achievability of Miscellaneous Measures

Respondents were asked to review the proposed transport measures and were asked if they were achievable or not.

A total of 467 answered these questions.

Overall, Measure 9, 'Review of Air Quality Planning Guidance to reflect updated air quality information' was considered the most achievable with 58% responding this way.

Measure 10, 'Continuation of MBC sponsorship of the Walk on Wednesday' was considered less achievable with 17% answering this way.



Demographic Differences

29% of Respondents aged 18 to 34 years said that Measure 9 'Review of Air Quality Planning Guidance to reflect updated air quality information' was unachievable, the highest response across all age groups.

A greater proportion of respondents from minority groups felt that Measure 9 was achievable with 83% answering this way compared to 58% of respondents from white groups.

Additional Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way. The comments are set out, by question, in the tables below:

M9: Review of Air Quality Planning Guidance to reflect updated air quality information (24 Comments)		
Theme	No.	Nature
Impact	14	A review will make difference. People have to rely on their cars so traffic will not be reduced.
Development	3	Development has lacked transport infrastructure. Planning doesn't care about environmental issues.
Costs	2	This measure is too expensive. This measure needs more investment.
Other	2	Should not have cut P&R. Do not support the 'Great Reset'.
Data	1	More information needed to make an informed decision.
Suggestions	1	Plant more trees. Subsidies for EVs.
Traffic	1	Sort out the one-way system.
M10: Continuation of MBC sponsorship of the Walk on Wednesday Scheme (75 Comments)		
Theme	No.	Nature
Impractical	18	People live too far away to walk to work/school. Not everybody can walk. People don't want to walk in poor weather/in the dark. Shopping locations out of town require a car for access and carrying goods.
Unaware of walk on Wednesday scheme	17	What is Walk on Wednesday? Unaware of this scheme.
Impact	17	This will be ignored. This measure will have minimal impact (particularly in the Lower Stone Street area). This will not impact on congestion. Impact would be greater if walking scheme was more than one day a week.
Waste of money	11	This measure is a waste of money.
Behaviours	8	People are unlikely to take part – will continue to use preferred method of transport.
Active travel	6	Cycling and walking are unsafe. There is a lack of cycle lanes/paths. Footpaths are narrow, overgrown and are dirty.
Other	3	Sort out the one-way system. Do not support the 'Great Reset'. Bus services being cut and no routes in rural areas.
Development	1	Nothing about reducing emissions from development.

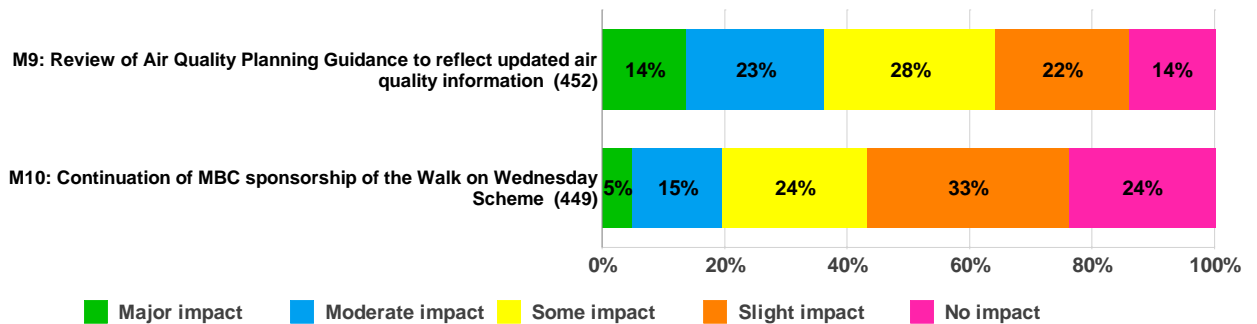
Impact of Miscellaneous Measures

Respondents were asked to indicate what impact they thought each of the measures would have on air quality locally.

A total of 452 respondents answered these questions.

Overall, respondents felt that Measure 9: Review of Air Quality Planning Guidance to reflect updated air quality information would have the greatest impact with 37% responding Major or Moderate impact. However, only a marginally lower proportion said that this measure would have a slight impact or not impact with 36% answering this way.

More than half of all respondents felt that Measure 10: Continuation of MBC sponsorship of the Walk on Wednesday Scheme would have a slight impact or no impact at all with 57% answering this way.



Demographic Differences

43% of female respondents felt that measure 9: Review of Air Quality Planning guidance to reflect updated air quality information, would have a major or moderate impact on air quality compared to 32% of male respondents.

66% of male respondents responding slight or no impact when asked about measure 10: Continuation of the MBC sponsorship of the walk on Wednesday Scheme compared to 44% of female respondents.

Miscellaneous Measures General Comments

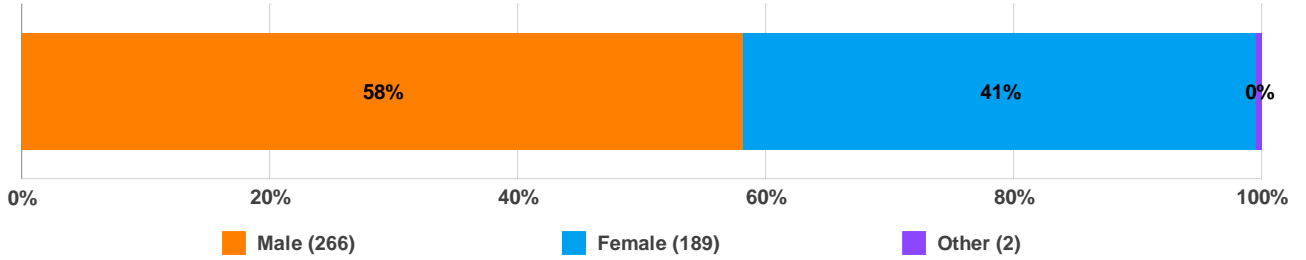
All respondents were given the opportunity to provide additional comments about the proposed Miscellaneous measures, a total of 94 comments were received.

Miscellaneous Measures Additional Comments		
Theme	No.	Nature
Walking Scheme	32	Never heard of the Walk on Wednesday scheme. People who want to walk already do.
Suggestions	16	Plant more trees.

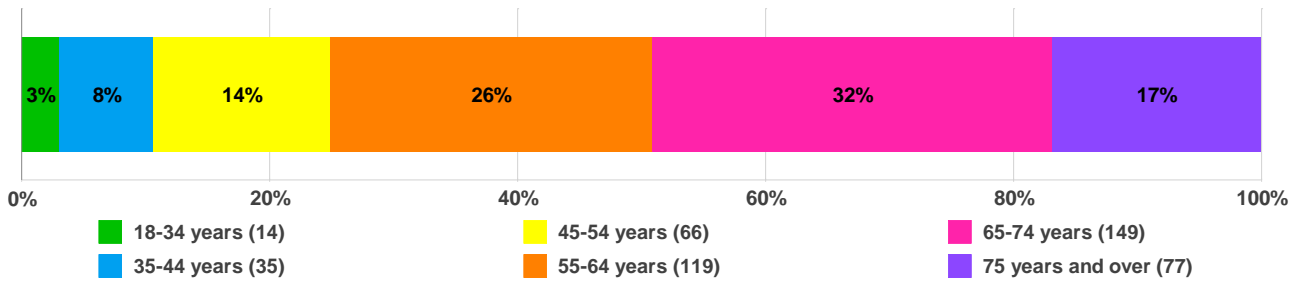
Miscellaneous Measures Additional Comments		
Theme	No.	Nature
		<p>Increase parking charges to discourage car use.</p> <p>Introduce stopping restrictions outside of schools and low traffic neighbourhoods.</p> <p>Promote walking buses and car sharing.</p> <p>Incentivise walking through trough CT discount.</p> <p>Link AQMA to Sustainability DPDs.</p> <p>Introduce a congestion charge.</p> <p>Look at installing City Trees (Wandsworth LA example).</p> <p>More cycle paths.</p>
Impact	13	<p>Measures will have little impact.</p> <p>Achievability of measure depends on will of the Council.</p>
Development	13	<p>Build fewer homes.</p> <p>Development should be designed to encourage walking.</p> <p>Travel infrastructure has not kept up with the speed of house building.</p> <p>This will slow down housing delivery.</p>
Public Transport	12	<p>Reinstate P&R.</p> <p>Buses do not cover all areas of the borough.</p> <p>Public transport needs to improve.</p>
Traffic	11	<p>Concentrate on reducing congestion and improving traffic flow.</p> <p>Improve the one-way system.</p> <p>Review traffic lights to target traffic flow at pollution hotspots.</p> <p>Remove traffic from the town centre.</p>
Safety	5	<p>Need safer bus shelters.</p> <p>Need safe cycle routes.</p> <p>Consider pedestrian safety (uneven & narrow pavements, appropriate crossing points).</p> <p>EV scooters on pavements are a safety issue.</p>
Other	5	<p>Unable to give an opinion further information needed.</p> <p>Wood burning stoves need to be addressed.</p> <p>Will Parish Councils be able to request air monitoring if they feel there is a need?</p> <p>Do not support the 'Great Reset'.</p>
EVs	2	<p>Charging points need to be reliable and maintained.</p> <p>Implications needed for non-electric vehicles using bays designated for EVs (i.e., those with chargers).</p>

Demographics

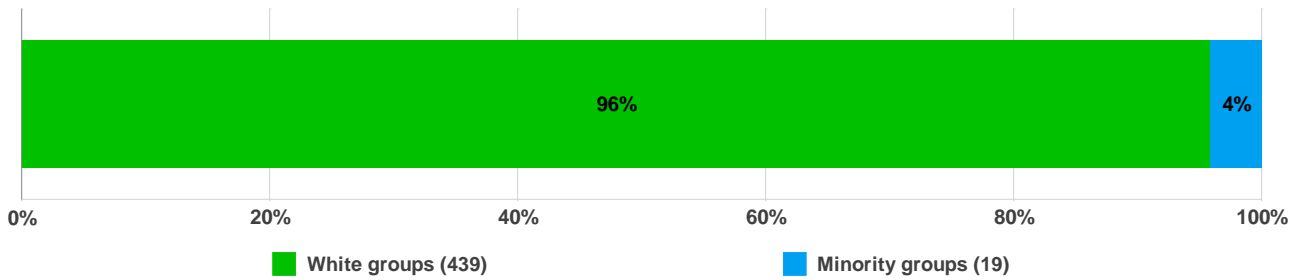
Gender



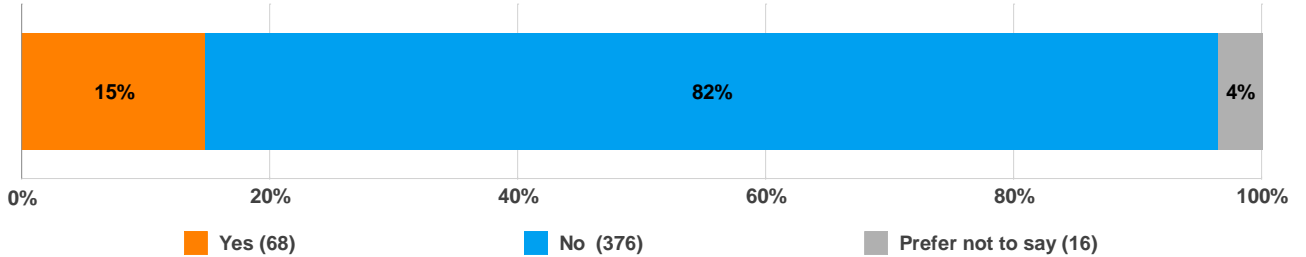
Age



Ethnicity



Disability



Appendix B: Reasons for Not Pursuing Action Plan Measures

None of the measures that were considered have been excluded.

Appendix C: Review of AQMA



Experts in air quality
management & assessment



AQMA Review:

Document Control

Client	Maidstone Borough Council	Principal Contact	Stuart Maxwell
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Job Number	J10/12378A/10
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Report Prepared By:	Joe Rondell, George Chousos, Dr Helen Pearce and Dr Kate Wilkins
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Document Status and Review Schedule

Report No.	Date	Status	Reviewed by
J10/12378A/10A/1/F3	23 February 2022	Final	Dr Clare Beattie (Associate Director)

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1 Introduction

- 1.1 Maidstone Borough Council (MBC) declared an Air Quality Management Area (AQMA) for the annual mean nitrogen dioxide objective in 2008, encompassing the entire Maidstone conurbation. This AQMA was reduced in size in 2018, and now covers the majority of roads within the Maidstone urban area.
- 1.2 This report sets out a review of the AQMA in Maidstone, to determine compliance with the annual mean air quality objective for nitrogen dioxide. The review has been undertaken with a view to reducing the size of the AQMA. As outlined in the 2020 Annual Status Report (ASR) (Maidstone Borough Council, 2020), MBC believes that compliance has already been achieved in the majority of the area, and that there is scope for revoking the AQMA in its current form and declaring a smaller AQMA.
- 1.3 Initially, the monitoring data within the AQMA has been reviewed, along with the locations of relevant exposure, which have been used to define the locations that require detailed modelling. The review considers data from the network of nitrogen dioxide diffusion tubes and automatic monitoring sites operated by MBC.
- 1.4 Detailed modelling of the area of interest has been undertaken for a baseline year (2019) to inform the extent of the proposed new AQMA. A future year (2022) has also been modelled to predict changes in nitrogen dioxide concentrations in the study area over time, without intervention to reduce traffic emissions. Two future scenarios, in which all buses comply with the Euro VI emission standard, and in which all buses are converted to electric vehicles, have also been tested to assess the impacts of these hypothetical scenarios on concentrations in the study area.
- 1.5 This report has been carried out by Air Quality Consultants Ltd (AQC) on behalf of MBC. It has been prepared taking account of the requirements set out in LAQM.TG(16) (Defra, 2021a) for amending or revoking AQMA orders. The professional experience of the consultants who have undertaken the review is summarised in Appendix 0.

2 Review of AQMA

2.1 Monitoring sites within Maidstone are shown in **Figure 1**. Three distinctive areas of focus have been selected for analysis ('M20 and North Maidstone', 'Barming and West Maidstone' and 'Central Maidstone and the A229'). Each distinct area of the AQMA has been reviewed and overall conclusions drawn.

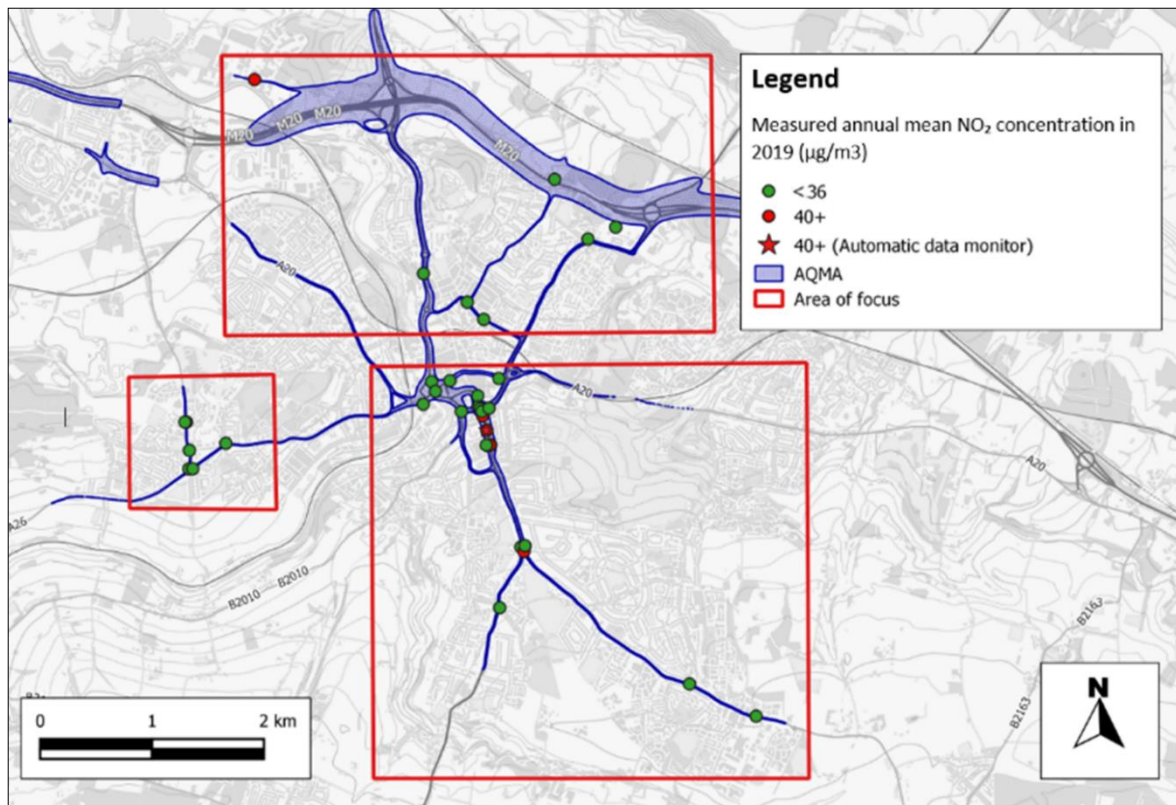


Figure 1: AQMA and Areas of Focus in Maidstone Borough Council

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2.2 The following sections present monitoring data for each area of the AQMA highlighted in **Figure 1**.

M20 and North Maidstone

2.3 Monitoring is carried out using diffusion tubes at seven locations in the north of Maidstone (see **Figure 2**). The monitoring locations are representative of worst-case exposure in the AQMA, being installed next to some of the busiest roads in the area.

2.4 As shown in **Figure 3** and **Table 2**, there is a downward trend in concentrations of annual mean nitrogen dioxide between 2016 and 2020 adjacent to the M20 and in North Maidstone. At all

locations except monitor Maid116, concentrations have been below the objective in 2017, 2018, 2019, and less than 90% of the objective in 2019 and 2020.

- 2.5 Exceedances of the annual mean objective have been measured at monitor Maid116 every year since monitoring commenced at that location in 2017. This monitor is located on a telegraph pole 1 m from the kerb of Forstal Road, 4.3 m from the façade of Forstal Road Cottages (the closest location of relevant exposure). In 2019 and 2020, once distance corrected to the façade of the property, the objective was achieved at monitor Maid116 ($37.6 \mu\text{g}/\text{m}^3$ and $31.6 \mu\text{g}/\text{m}^3$, respectively) and in 2018 the objective was just achieved (calculated to be $40 \mu\text{g}/\text{m}^3$ at the façade).
- 2.6 In early 2020, activity in the UK was disrupted by the COVID-19 pandemic. As a result, concentrations of traffic-related air pollutants fell appreciably (Defra Air Quality Expert Group, 2020). While the pandemic may cause long-lasting changes to travel activity patterns, it is reasonable to expect a return to more typical activity levels in the future. It is thus likely that 2020 presents as an atypically low pollution year for roadside pollutant concentrations, as will 2021.
- 2.7 While 2020 was not a representative year, considering the recent trends in the monitoring data, is it recommended the AQMA is revoked in northern Maidstone and this area of the M20, including at Forstal. It is recommended that, if practical, a diffusion tube is located on one of the Forstal Road Cottages to ensure compliance. However, it is considered that façade concentrations are likely to reduce further in future years and exceedances are unlikely.

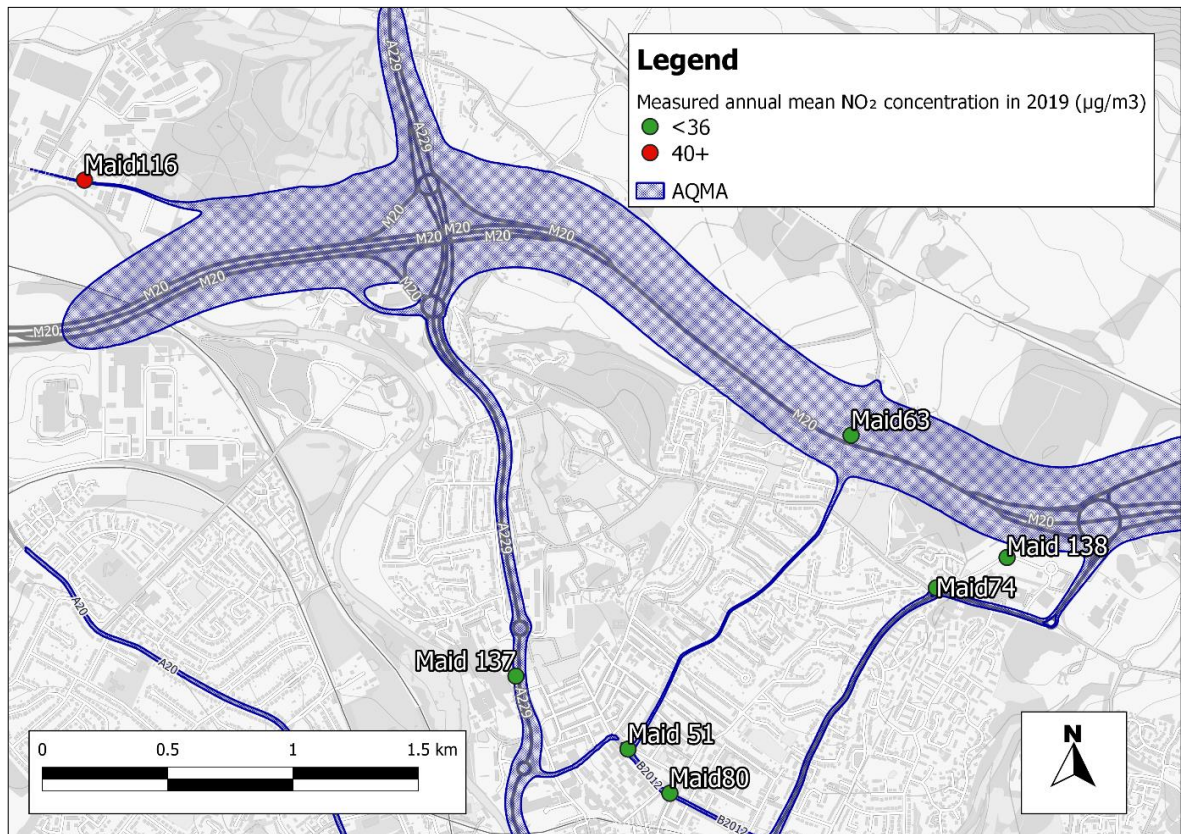


Figure 2: Air Quality Monitoring along the M20 and North Maidstone

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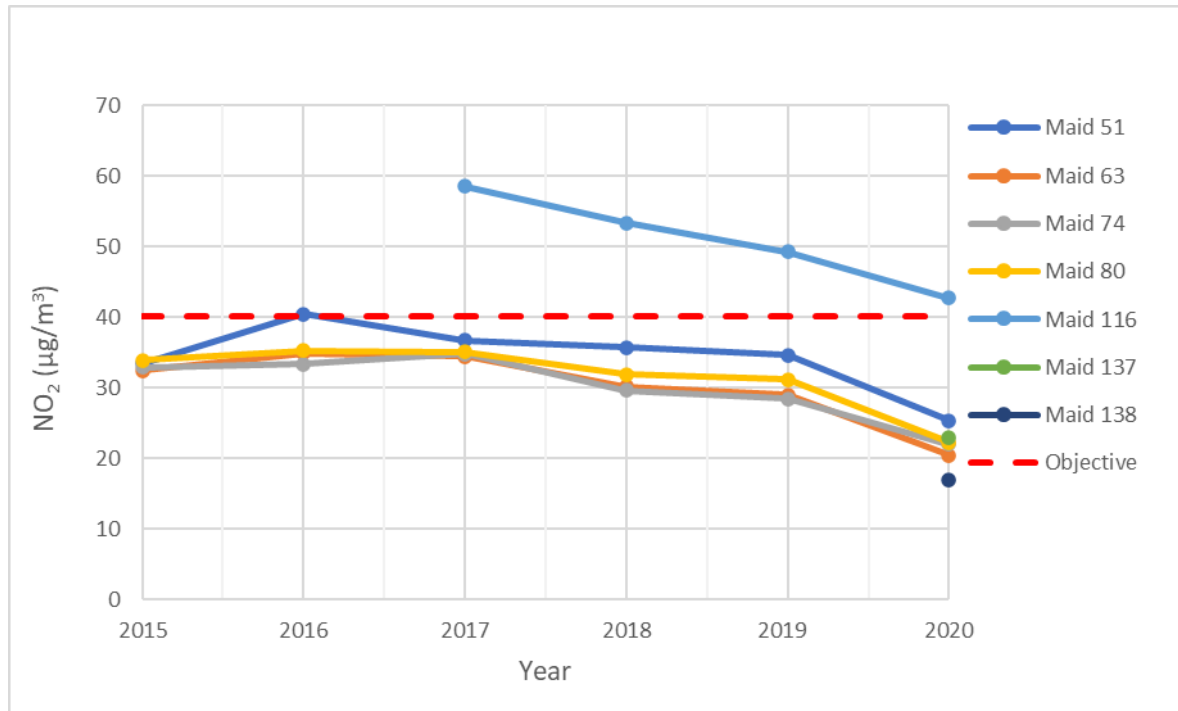


Figure 3: Annual Mean NO₂ at Diffusion Tube Monitoring Sites along the M20 and in North Maidstone

Table 2: Summary of Annual Mean Nitrogen Dioxide Monitoring (2016-2020) along the M20 and in North Maidstone (µg/m³)^a

Site	Site Type	Location	Distance to kerb (m)	Distance to relevant exposure ^b	2015	2016	2017	2018	2019	2020
Maid 51	Roadside	576147, 156488	3.5	0	33.4	40.4	36.7	35.7	34.6	25.3
Maid 63	Roadside	577037, 157739	12.8	0	32.4	34.9	34.4	30.1	29.0	20.4
Maid 74	Roadside	577377, 157131	6.0	0	32.9	33.3	34.8	29.6	28.4	22.0
Maid 80	Kerbside	576314, 156312	1.0	4.5	33.9	35.2	35.0	31.9	31.1	22.2
Maid 116	Roadside	573979, 158756	1.0	4.3	-	-	58.5	53.3	49.2	42.7
Maid 137	Roadside	575700, 156779	2.0	n/a	-	-	-	-	-	23.0
Maid 138	Roadside	577659, 157252	2.0	n/a	-	-	-	-	-	16.9

^a Exceedances of the objective are shown in bold.

^b A distance of 0 m denotes that the monitoring site is representative of relevant exposure (e.g. on the façade of a residential property).

Barming and West Maidstone

2.8 Monitoring is carried out at six locations within Barming and West Maidstone, as shown in **Figure 4** and **Table 3**. There have been no measured exceedances of the annual mean nitrogen dioxide objective since 2016 at any monitoring site in this area, and concentrations have all been well below the objective since 2018. There is also a clear downward trend in measured concentrations at these locations, as shown in Figure 5. It is therefore recommended that this section of the AQMA is revoked.

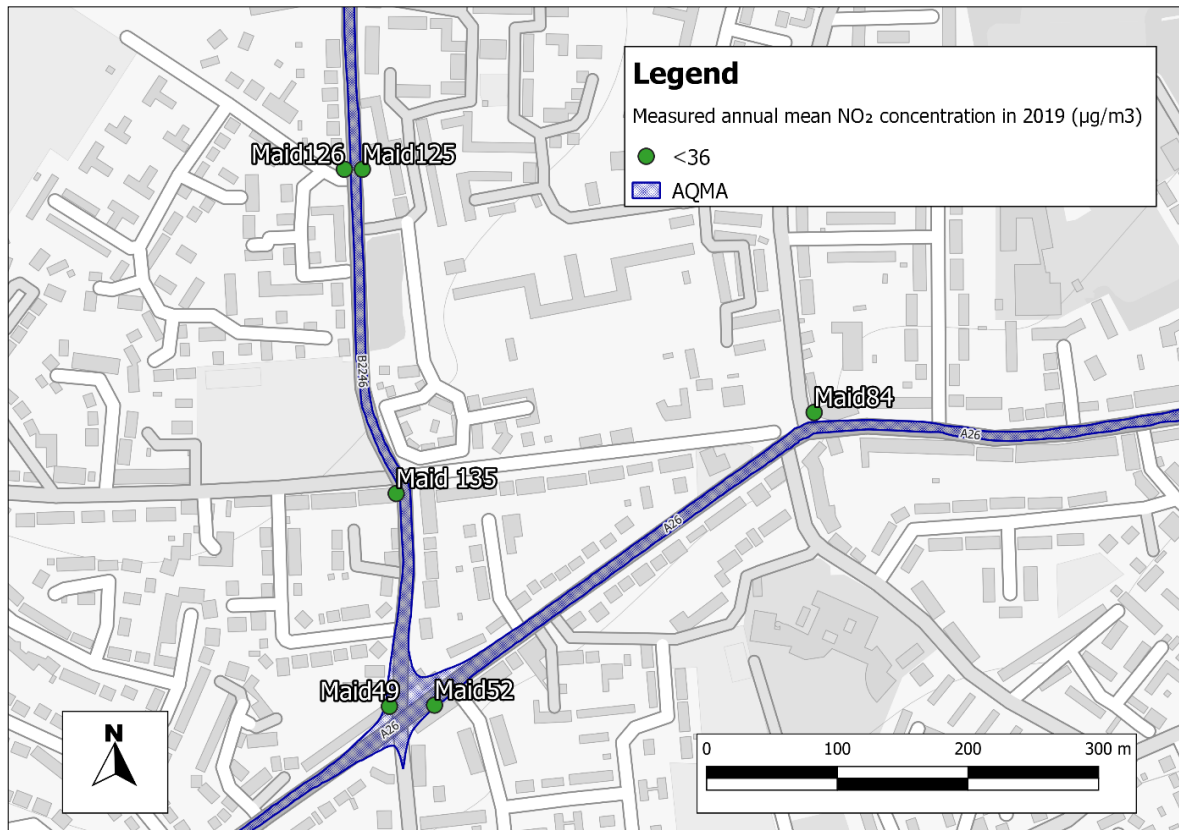


Figure 4: Air Quality Monitoring in Barming and West Maidstone

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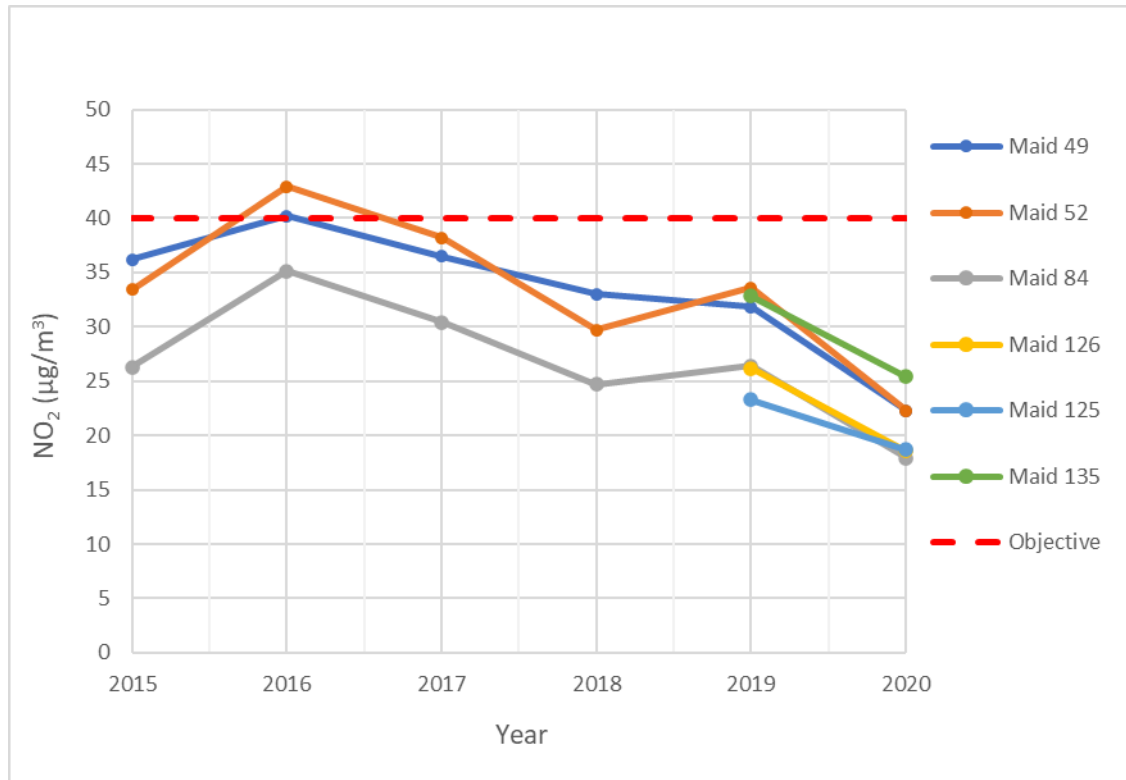


Figure 5: Annual Mean NO₂ at Diffusion Tubes Monitoring Sites in Barming and West Maidstone

Table 3: Summary of Annual Mean Nitrogen Dioxide Monitoring (2016-2020) in Barming and West Maidstone (µg/m³)^a

Site	Site Type	Location	Distance to kerb (m)	Distance to relevant exposure ^b	2015	2016	2017	2018	2019	2020
Maid 49	Roadside	573309, 154789	6.6	0.0	36.2	40.2	36.5	33.0	31.8	22.3
Maid 52	Roadside	573349, 154790	2.4	2.9	33.4	42.9	38.2	29.7	33.6	22.3
Maid 84	Roadside	573686, 155050	1.0	0.0	26.3	35.1	30.4	24.7	26.4	17.9
Maid 126	Roadside	573269, 155266	2.6	3.0	-	-	-	-	26.2	18.6
Maid 125	Roadside	573285, 155266	2.6	3.0	-	-	-	-	23.3	18.7
Maid 135	Roadside	573315, 154978	2.0	0.0	-	-	-	-	32.8	25.4

^a Exceedances of the objective are shown in bold.

^b A distance of 0 m denotes that the site is representative of relevant exposure (e.g. on the façade of a residential property).

Central Maidstone and the A229

- 2.9 Monitoring is carried out at one automatic monitoring station (CM3) and 19 diffusion tube monitors within central Maidstone and adjacent to the A229, as shown in **Figure 6**. Annual mean results for the years 2015 to 2020 are summarised in **Table 4**. The monitoring data for years earlier than 2020 have been taken from MBC's 2020 ASR (Maidstone Borough Council, 2020), while data for 2020 have been taken from the Council's 2021 ASR (Maidstone Borough Council, 2021).
- 2.10 At all locations except CM3, Maid81, Maid96, Maid122 and Maid53 measured concentrations have been below the annual mean objective (in the majority of cases well below the objective) for a number of years.
- 2.11 Monitors CM3, Maid81, Maid96, Maid122 and Maid53 are all located adjacent to the A229; CM3, Maid81, Maid96, Maid122 are all located adjacent to Upper Stone Street. Monitor Maid53 is located further to the south, outside the Wheatsheaf Pub at the junction of Loose Road and Sutton Road. Measured exceedances at these monitoring sites are significant, with concentrations, even in 2020, greater than $60 \mu\text{g}/\text{m}^3$ at some locations, indicating the potential for exceedances of the 1-hour mean nitrogen dioxide objective. It is therefore recommended that detailed dispersion modelling of traffic emissions is carried out to determine the extent of exceedance at relevant locations within the area.
- 2.12 It is proposed that the model domain covers the A229 Upper Stone Street from the junction of Knightrider Street, up to the junction of Loose Road and Sutton Road. It should be noted that the Wheatsheaf Pub is likely to be demolished and is currently empty, and hence will not be used as a specific receptor in the modelling. Modelling will include specific receptor locations at heights of relevant exposure. The modelling will also incorporate the outcomes of traffic monitoring using Automatic Number Plate Recognition (ANPR) cameras, to provide an up-to-date indication of the vehicle fleet along Upper Stone Street (both in terms of vehicle type and Euro class of vehicle).
- 2.13 The monitoring data shown in **Figure 7** indicate that annual mean nitrogen dioxide concentrations are reducing, but trends are not as clear cut as in other locations across Maidstone. Therefore, in order to provide a worst-case approach for re-defining the AQMA, 2019 will be used as the baseline for the modelling. A discussion of the modelling approach and results are included in Section 3.

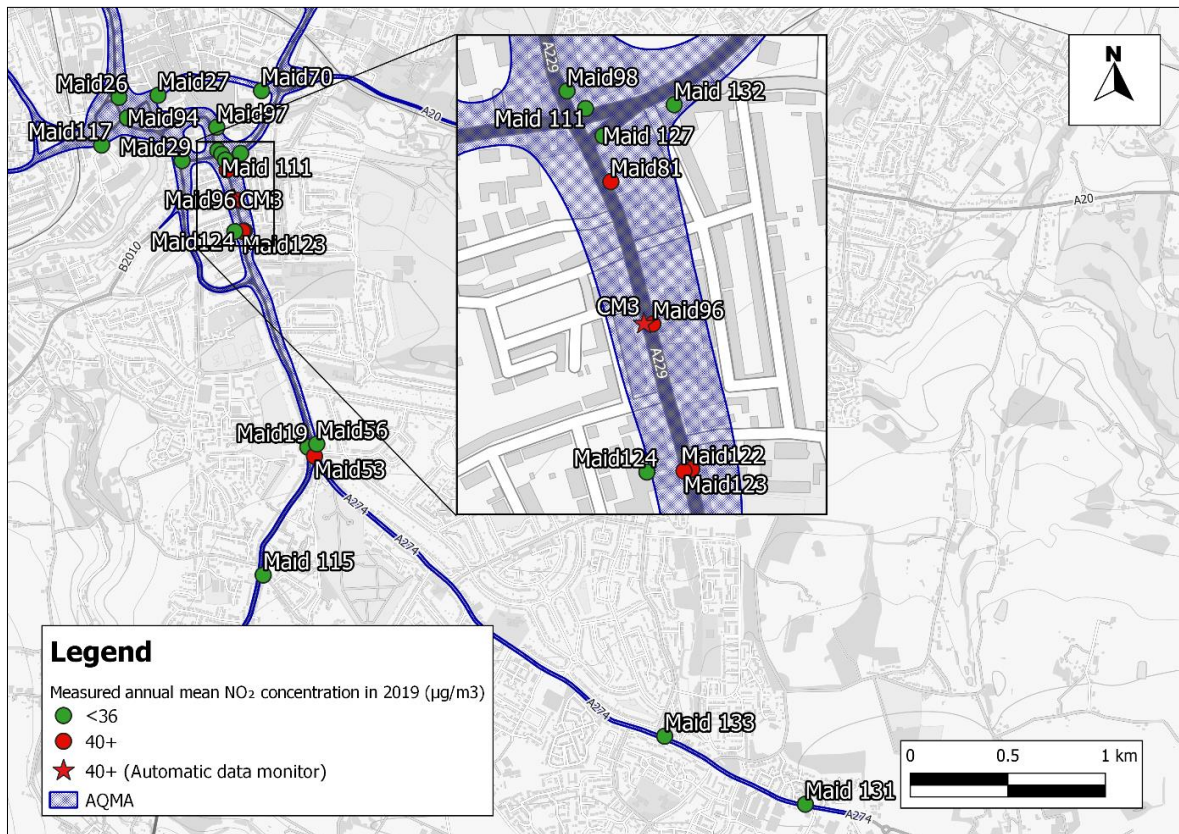


Figure 6: Air Quality Monitoring in Central Maidstone and the A229

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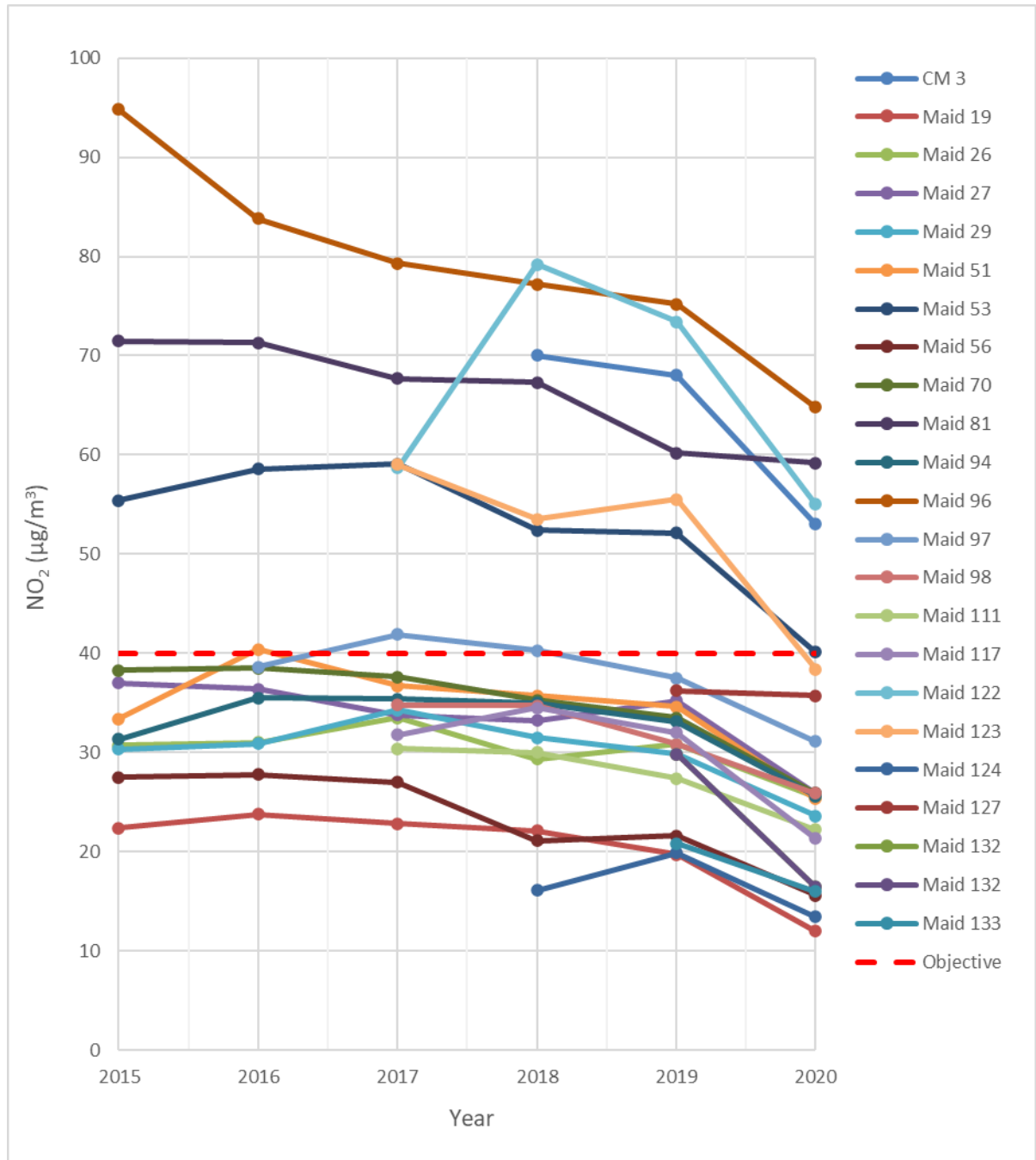


Figure 7: Annual Mean Nitrogen Dioxide Concentrations in Central Maidstone and the A229

Table 4: Summary of Nitrogen Dioxide Monitoring (2015-2020) in Central Maidstone and the A229 ($\mu\text{g}/\text{m}^3$)

Site	Site Type	Location	Distance to kerb (m)	Distance to relevant exposure ^b	2015	2016	2017	2018	2019	2020
CM3	Roadside	576337, 155183	1.5	n/a	-	-	-	70	68	53
Maid 19	Roadside	576692, 153992	13.3	0	22.4	23.8	22.8	22.1	19.7	12.0
Maid 26	Roadside	575782, 155678	3.0	0	30.7	31.0	33.5	29.3	30.8	25.5
Maid 27	Roadside	575970, 155688	4.4	1.2	37.0	36.4	33.8	33.2	35.2	25.9
Maid 29	Roadside	576086, 155373	2.8	41	30.3	30.9	34.3	31.5	29.9	23.6
Maid 51	Roadside	576147, 156488	0	3.5	33.4	40.4	36.7	35.7	34.6	25.3
Maid 53	Roadside	576724, 153948	1.0	2.0	55.4	58.6	59.1	52.4	52.1	40.1
Maid 56	Kerbside	576735, 154007	15.1	0	27.5	27.8	27.0	21.1	21.6	15.6
Maid 70	Roadside	576469, 155710	1.3	1.7	38.3	38.5	37.6	35.3	33.5	25.9
Maid 81	Kerbside	576303, 155329	0	1.0	71.5	71.3	67.7	67.3	60.2	59.2
Maid 94	Roadside	575822, 155183	10.0	0	31.3	35.5	35.4	35.0	33.1	25.6
Maid 96	Roadside	576346, 155183	1.5	0	94.8	83.8	79.3	77.2	75.2	64.8
Maid 97	Roadside	576253, 155534	2.1	5.0	-	38.6	41.9	40.3	37.5	31.1
Maid 98	Roadside	576258, 155422	3.0	5.0	-	35.2	34.8	34.7	30.8	25.9
Maid 111	Roadside	576277, 155404	1.5	9.8	-	-	30.4	30.0	27.4	22.2
Maid 117	Roadside	575698, 155448	1.3	31.0	-	-	31.8	34.5	32.0	21.3
Maid 122	Roadside	576386, 155032	1.5	0	-	-	58.7	79.2	73.4	55.0
Maid 123	Roadside	576378, 1550532	1.5	6.9	-	-	59.0	53.5	55.5	38.4
Maid 124	Roadside	576340, 155031	40.0	0	-	-	-	16.1	19.9	13.4
Maid 127	Roadside	576295, 155376	1.5	2.0	-	-	-	-	36.2	35.7
Maid 132	Roadside	576368, 155408	2.0	2.0	-	-	-	-	29.8	16.4
Maid 132	Roadside	576368, 155408	2.0	1.7	-	-	-	-	29.8	16.4
Maid 133	Roadside	578412, 152598	4.6	0	-	-	-	-	20.8	16.0

^a Exceedances of the objective are shown in bold.

^b A distance of 0 m denotes that the site is representative of relevant exposure (e.g. on the façade of a residential property).

3 Detailed Assessment of Upper Stone Street

Modelling Methodology

- 3.1 Annual mean concentrations of nitrogen dioxide have been predicted for the existing and future baselines (2019 Baseline and 2022 Baseline, respectively) and two future scenarios (2022 Euro VI Bus and 2022 EV Buses). The 2022 Euro VI Bus scenario assumes all buses and coaches meet Euro VI emission standards. The 2022 EV Bus scenario assumes all buses and coaches are converted to electric vehicles. Concentrations have been predicted throughout Upper Stone Street and Loose Road using the ADMS-Roads dispersion model, with vehicle emissions derived using Defra's Emission Factor Toolkit (EFT) (v11.0). Details of the model inputs, assumptions and the verification are provided in Appendix 0, together with the method used to derive background concentrations. Where assumptions have been made, a realistic worst-case approach has been adopted.

Receptors

- 3.2 Concentrations have been predicted at residential properties adjacent to Loose Road and Upper Stone Street, as derived from GIS data provided by MBC. Concentrations have been predicted at heights of relevant exposure. The specific receptors modelled are shown in Figure 8.
- 3.3 Concentrations have also been predicted across a 100 m x 100 m Cartesian grid centred on the junction of Sheal's Crescent and Loose Road (see **Figure 9**). Additional grids have also been considered at a spacing of 5 m x 5 m within 200 m of the modelled roads. The receptor grid has been modelled at a height of 1.5 m above ground level.

Traffic Data

- 3.4 ANPR data, provided by Intelligent Data, were collected on Upper Stone Street between 29 September and 5 October 2021. The dataset provides traffic counts and a breakdown of vehicles by type and Euro class. This information has been used together with modelled traffic flows for 2019 in the area (provided by Kent County Council (KCC)), to estimate traffic flows, fleet composition and speed across the area of focus in 2019 and 2022.
- 3.5 Defra's EFT has been used to estimate vehicle emissions using the Fleet Projection Tool to factor the 2021 ANPR fleet mix by Euro class back to the 2019 baseline year and forward to the 2022 future year.

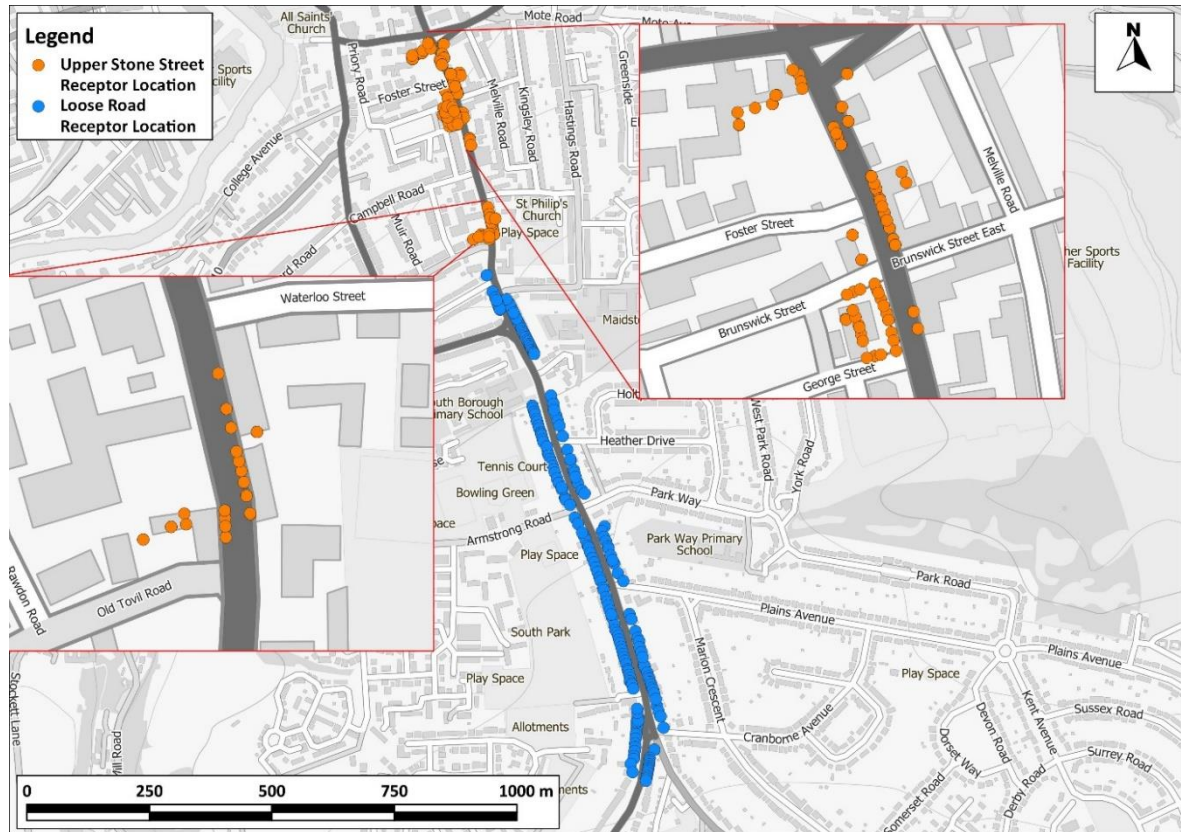


Figure 8: Specific Receptor Locations

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Figure 9: Nested Cartesian Grids of Receptors

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Uncertainty

- 3.6 There are many components that contribute to the uncertainty of modelling predictions.
- 3.7 The road traffic emissions dispersion model used in this assessment is dependent upon the traffic data that have been input, which will have inherent uncertainties associated with them, and any uncertainties inherent in these data will carry into the assessment. There will also be uncertainties associated with projecting the ANPR data from 2021 to 2019 and 2022 using Defra’s EFT, and within the ANPR data themselves.
- 3.8 Uncertainty is also introduced when modelling the impacts of street canyons within the ADMS dispersion model and calculating the effect of gradients on vehicle emissions within the EFT. Both of these effects have been considered within the modelling.
- 3.9 There are then additional uncertainties as models are required to simplify real-world conditions into a series of algorithms. An important stage in the process is model verification, which involves comparing the model output with measured concentrations (see Appendix 0). Because the model

has been verified and adjusted, there can be reasonable confidence in the prediction of 2019 concentrations. LAQM.TG16 (Defra, 2021a) provides guidance on the evaluation of model performance. An analysis of the verification is shown in Table AError! No text of specified style in document..3 in Appendix O.

- 3.10 All of the measured concentrations presented will also have an intrinsic margin of error, which will also have been carried into the results of the modelling.

Modelling Results

2019 Baseline Scenario

- 3.11 **Figure 10** shows modelled annual mean nitrogen dioxide concentrations at the lowest modelled height at the specific receptors in the 2019 Baseline. This indicates that the annual mean objective is achieved at the majority of receptors, however there are exceedances of the objective predicted along Upper Stone Street. All of these locations are within street canyons formed by the buildings along Upper Stone Street, which is also on a gradient. It is estimated that the annual mean nitrogen dioxide objective is exceeded at 44 residential receptors in 2019 (including multiple floor levels at the same location), of which an annual mean concentration of $60 \mu\text{g}/\text{m}^3$ is exceeded at approximately nine.
- 3.12 Two isopleth maps of the modelled annual mean nitrogen dioxide concentrations in the 2019 baseline, at ground-floor level of Upper Stone Street and Loose Road are presented in Figure 11 and **Figure 12**, respectively.

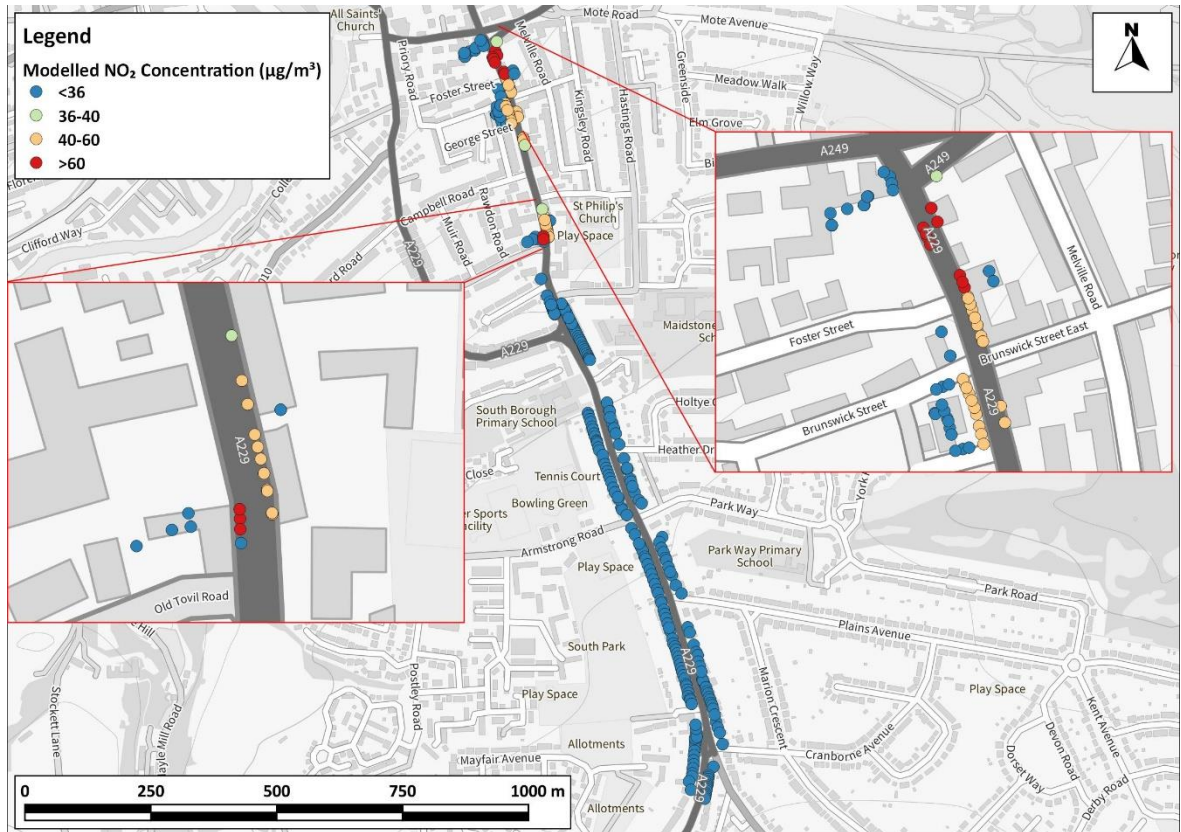


Figure 10: Modelled Annual Mean Nitrogen Dioxide Concentrations at Specific Receptors in 2019 Baseline

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Figure 11: Contour Map of Modelled Annual Mean Nitrogen Dioxide Concentrations in 2019 Baseline along Upper Stone Street

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Figure 12: Contour Map of Modelled Annual Mean Nitrogen Dioxide Concentrations in 2019 Baseline along Loose Road

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3.13 Figure 11 indicates that the annual mean objective is predicted to be exceeded at locations adjacent to Lower Stone Street, Upper Stone Street and Mote Road, Loose Road, and at a small section along Sutton Road in 2019. However, it should be noted that the only locations of relevant exposure to the annual mean nitrogen dioxide objective at which the objective is predicted to be exceeded are

adjacent to Upper Stone Street. The contour bandings should be treated with caution, as the inclusion of street canyons within the modelling leads to large concentration gradients inside versus outside the canyon.

- 3.14 In general, the model is considered to over-predict concentrations at the junction of Upper Stone Street, Knightrider Street, Mote Road and Lower Stone Street and slightly under-predict at the section of Upper Stone Street between Brunswick Street and Old Tovil Road. At the junction of Lower Stone Street, Mote Road and Upper Stone Street, exceedances have been predicted by the model where measured concentrations were below the objective in 2019 (specifically monitoring sites Maid98, Maid111 and Maid127). The over-prediction at this location is, in part, a result of the use of a conservative verification factor, described in Appendix 0. Similarly, the verification factor used incorporates the locations at which the model performs well, leading to an under-predictions at the locations where measured concentrations are highest, i.e., Upper Stone Street.
- 3.15 The high predicted and measured concentrations along sections of Upper Stone Street are likely to be due to limited dispersion within these areas due to the presence of street canyons and the effects of the uphill gradient on that road. Measured concentrations adjacent to this section of road in 2019 are above the objective at locations of relevant exposure. Concentrations at the majority of the roadside receptors adjacent to Upper Stone Street are predicted to exceed the objective in 2019.
- 3.16 Predictions and measurements suggest concentrations at some locations adjacent to Upper Stone Street are also above $60 \mu\text{g}/\text{m}^3$ and therefore there is a risk of exceedances of the 1-hour mean objective along this road; indeed, the objective was exceeded in 2019 at monitor CM3⁸.

AQMA Recommendation

- 3.17 There is uncertainty surrounding both the measured and modelled concentrations. It is therefore recommended that any amendments to the AQMA include, as a minimum, all locations where measured and modelled concentrations exceed $36 \mu\text{g}/\text{m}^3$ at specific locations of relevant exposure. This will reduce the possibility of having to extend the AQMA boundary as a result of annual variations in concentrations. The AQMA should, as a minimum, cover Upper Stone Street from the junction of the A429 to Old Tovil Road, as shown in **Figure 13**.

⁸ See latest Annual Status Report for details.



Figure 13: Proposed AQMA Boundary

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2022 Baseline Scenario

- 3.18 **Figure 14** shows modelled annual mean nitrogen dioxide concentrations at the lowest modelled height at the specific receptors in the 2022 Baseline. This indicates that the annual mean objective is exceeded at fewer receptors in 2022 than in 2019 adjacent to Upper Stone Street, without any

intervention. In particular, several receptors to the north and south of Brunswick Street East and two receptors to the south of Waterloo Street are no longer predicted to exceed the objective. There are also fewer predicted exceedances of $60 \mu\text{g}/\text{m}^3$ between Brunswick Street East and the A429, and north of Old Tovil Road. In total, it is estimated that the annual mean nitrogen dioxide objective is exceeded at 27 receptors in the 2022 Baseline, of which an annual mean concentration of $60 \mu\text{g}/\text{m}^3$ is exceeded at approximately three.

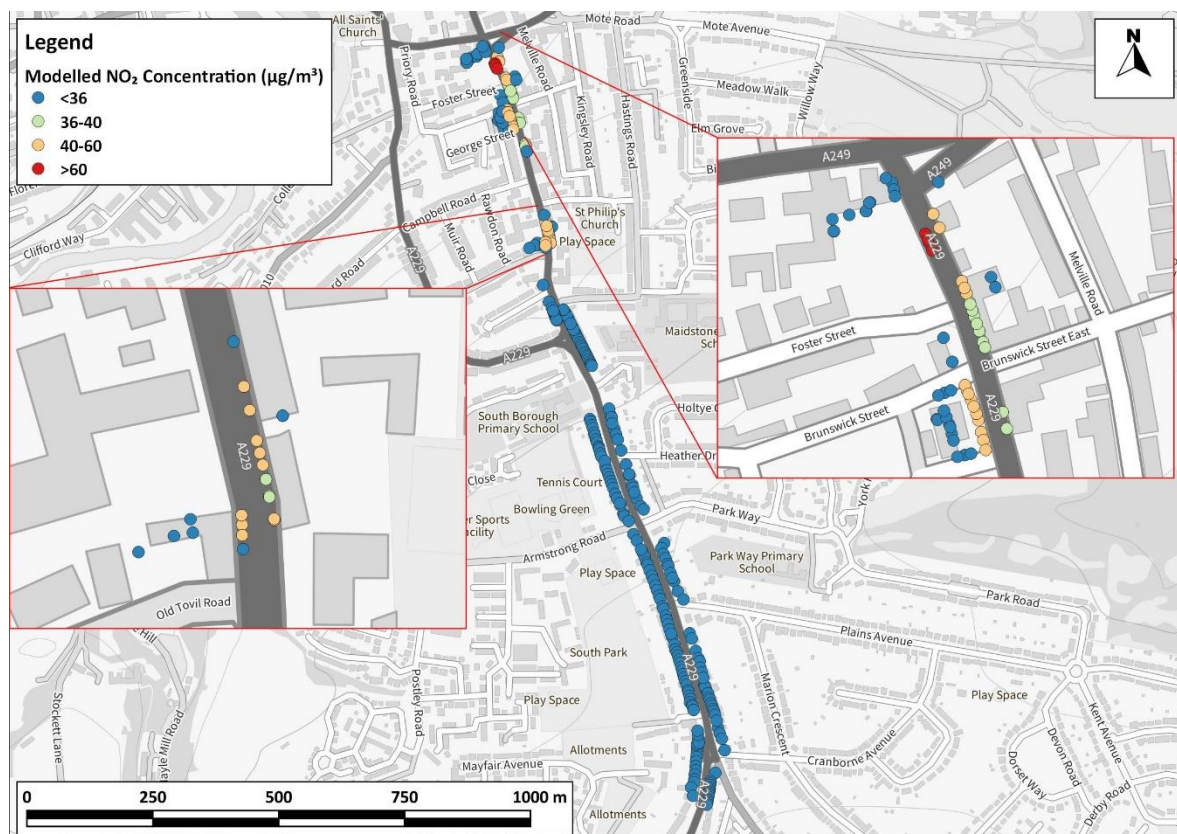


Figure 14: Modelled Annual Mean Nitrogen Dioxide Concentrations at Specific Receptors in 2022 Baseline

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2022 Euro VI Bus Scenario

3.19 **Figure 15** shows modelled annual mean nitrogen dioxide concentrations at the specific receptors in the 2022 Euro VI Bus scenario. Compared to the 2022 Baseline scenario, the objective is predicted to be achieved at additional receptors to the south of Brunswick Street and to the south of Waterloo Street. Exceedances of the objective are predicted to remain to the north of Old Tovil Road, to the north of George Street, opposite and north of Foster Street. Concentrations exceeding $60 \mu\text{g}/\text{m}^3$ are predicted north of Foster Street. In total, it is estimated that the annual mean nitrogen dioxide

objective is exceeded at 15 receptors in the 2022 Euro VI Bus Scenario, of which an annual mean concentration of $60 \mu\text{g}/\text{m}^3$ is exceeded at approximately three.

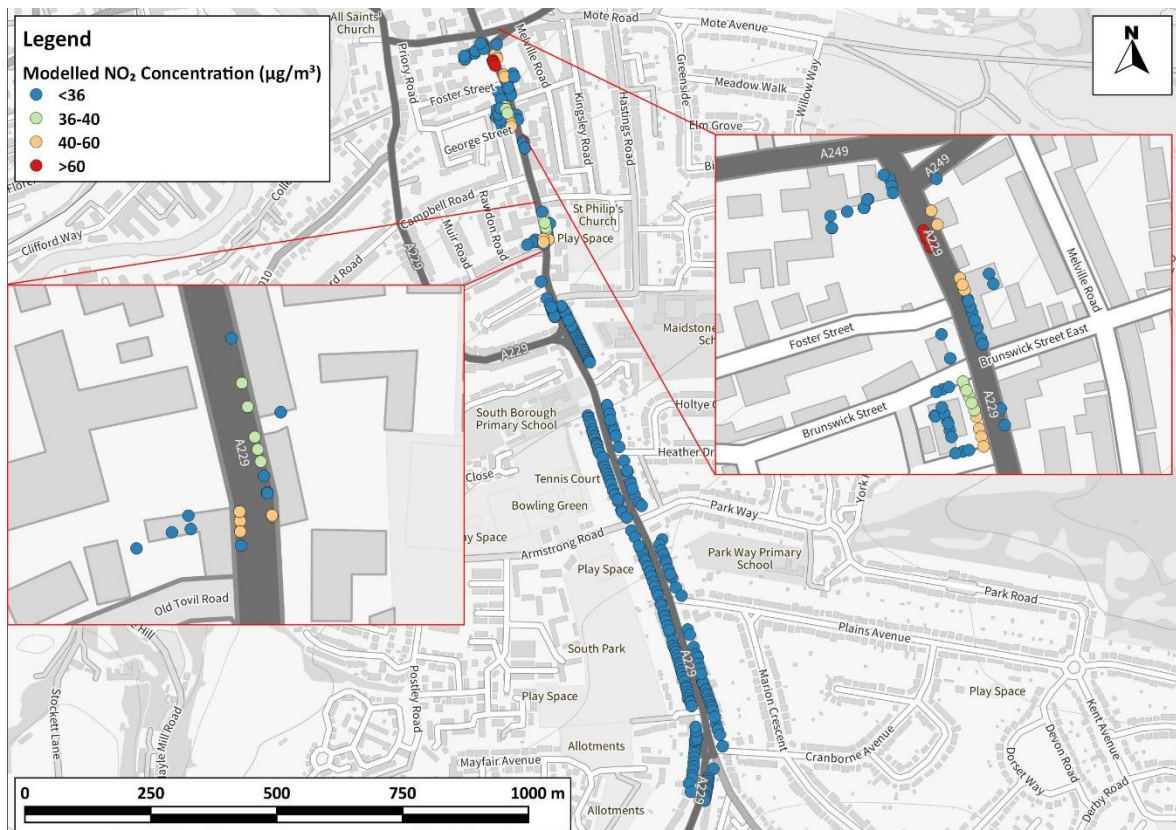


Figure 15: Modelled Annual Mean Nitrogen Dioxide Concentrations at Specific Receptors in 2022 Euro VI Bus Scenario

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2022 EV Bus Scenario

3.20 **Figure 16** shows modelled annual mean nitrogen dioxide concentrations at the specific receptors in the 2022 EV Bus scenario. There is no difference between the 2022 Euro VI Bus and 2022 EV Bus scenarios, in terms of how many exceedances of the objective and of $60 \mu\text{g}/\text{m}^3$ are predicted to occur.

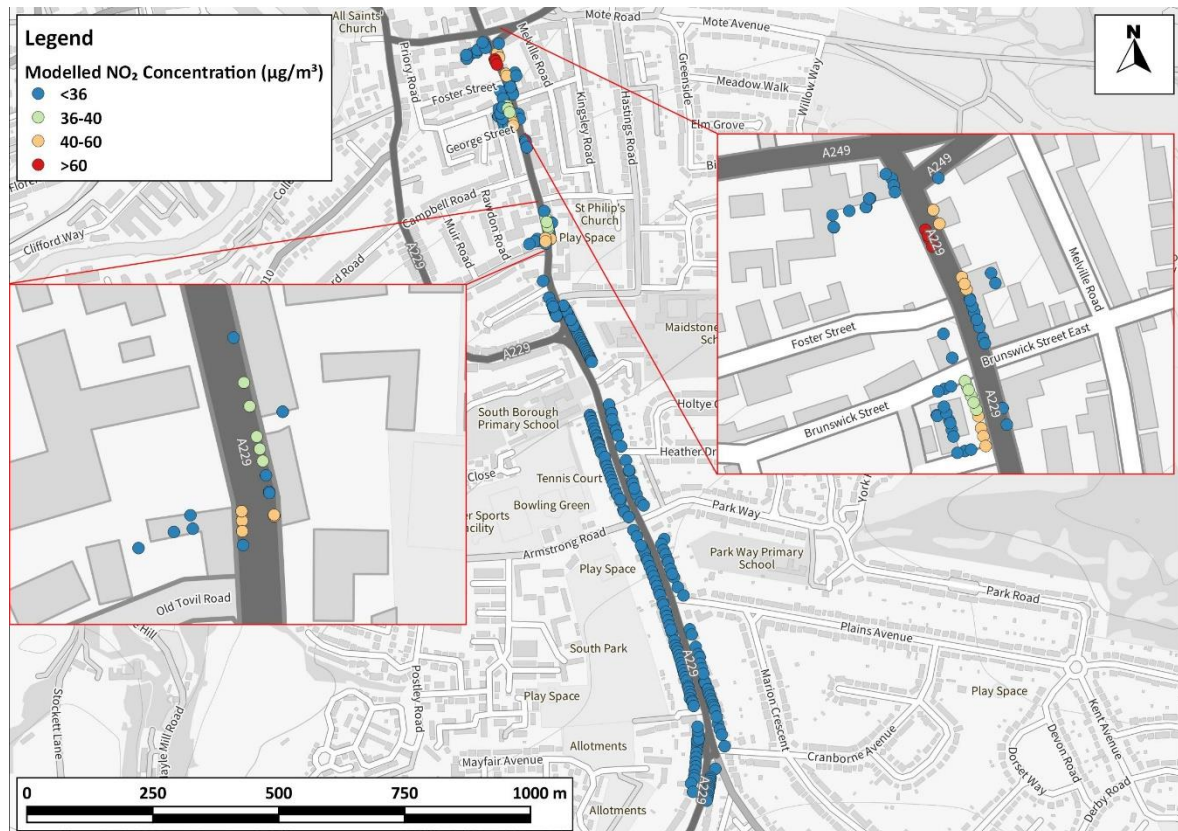


Figure 16: Modelled Annual Mean Nitrogen Dioxide Concentrations at Specific Receptors in 2022 EV Bus Scenario

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Source Apportionment on Upper Stone Street

- 3.21 Defra's EFT has been used to provide an indication of the proportion of road traffic emissions on Upper Stone Street from each vehicle and Euro class type in 2019. Emissions of particulate matter from each vehicle type have been included for information.
- 3.22 Figure 17 and Table 5 show the percentage of emissions by vehicle type. This has been calculated using the total modelled annual emissions on Upper Stone Street in 2019 and the Source Apportionment option within the EFT. The results indicate that the majority of road NO_x emissions in 2019 were produced by Diesel Cars (33.0%), followed by Buses/Coaches (20.4%), Rigid Heavy Goods Vehicles (HGVs) (17.5%), and Diesel Light Goods Vehicles (LGVs) (17.4%). For particulate matter emissions (PM₁₀ and PM_{2.5}), the contribution from Petrol Cars is proportionally much higher than for NO_x.

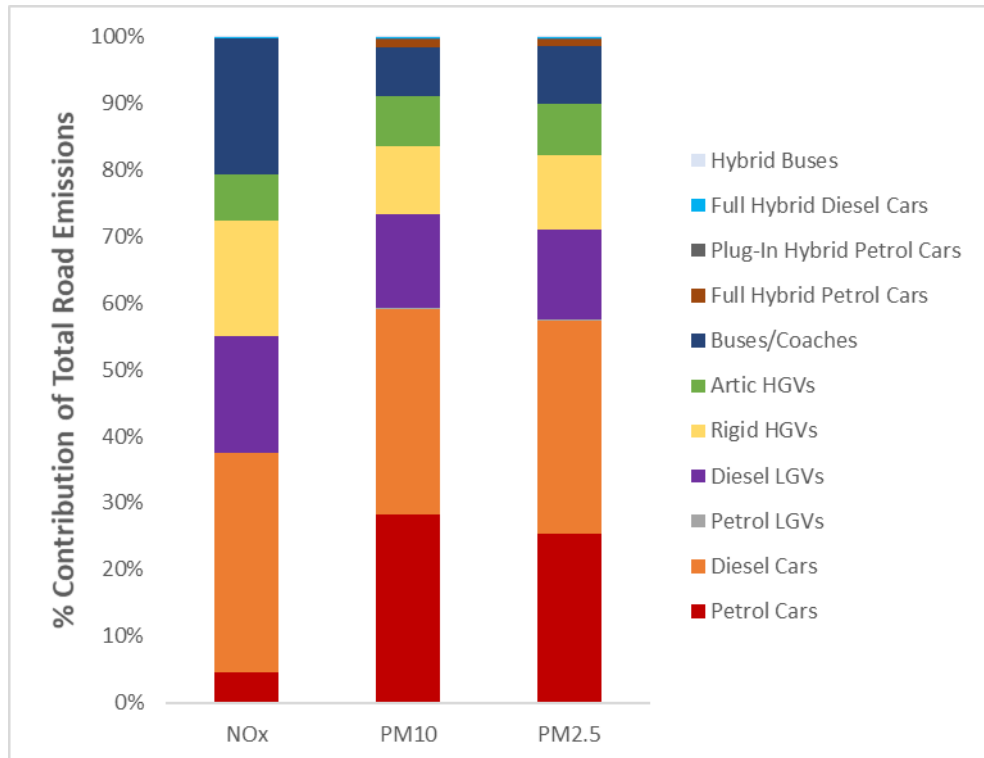


Figure 17: Percentage Contribution of Total Road Emissions by Vehicle Type (2019 Baseline)

Table 5: Percentage Contribution of Total Road Emissions by Vehicle Type (2019)

Vehicle Type	NOx (%)	PM ₁₀ (%)	PM _{2.5} (%)
Petrol Cars	4.5	28.3	25.3
Diesel Cars	33.0	30.7	32.1
Petrol LGVs	0.0	0.2	0.2
Diesel LGVs	17.4	14.0	13.6
Rigid HGVs	17.5	10.2	11.2
Artic HGVs	6.9	7.5	7.6
Buses/Coaches	20.4	7.4	8.7
Full Hybrid Petrol Cars	0.1	1.1	1.0
Plug-In Hybrid Petrol Cars	0.0	0.3	0.3
Full Hybrid Diesel Cars	0.2	0.2	0.2
FCEV LGVs	0.0	0.0	0.0
CNG Buses	0.0	0.0	0.0
Hybrid Buses	0.1	0.1	0.1
FCEV Buses	0.0	0.0	0.0

3.23 Figure 18, Figure 19, Table 6 and Table 7 show the percentage contribution of NOx emissions by vehicle Euro class for Light Duty Vehicles (LDVs) and Heavy Duty Vehicles (HDVs; HGVs and

Buses/Coaches), respectively. The proportions have been calculated based on the annual emissions from all modelled roads using the EFT's Euro Emissions Standards Summary for NOx.

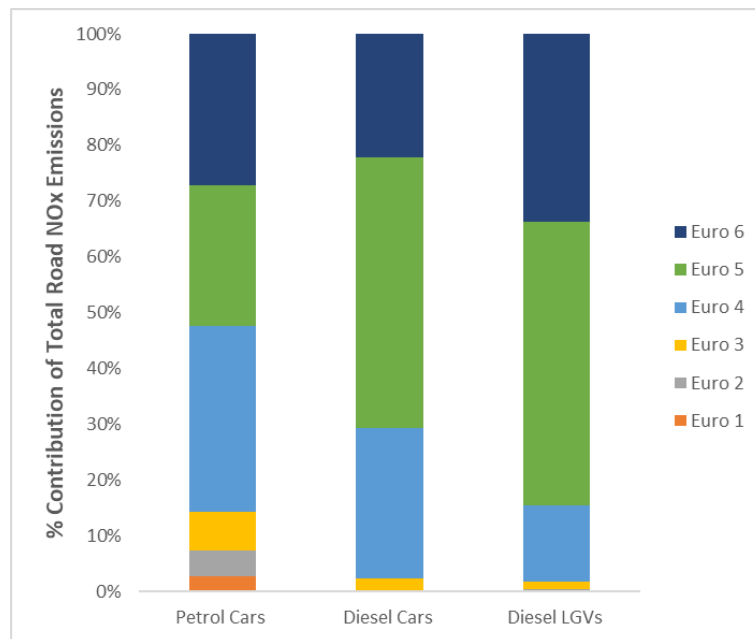


Figure 18: Percentage Contribution of Total Road NOx Emissions from Light Duty Vehicles by Euro Class Type (2019 Baseline)

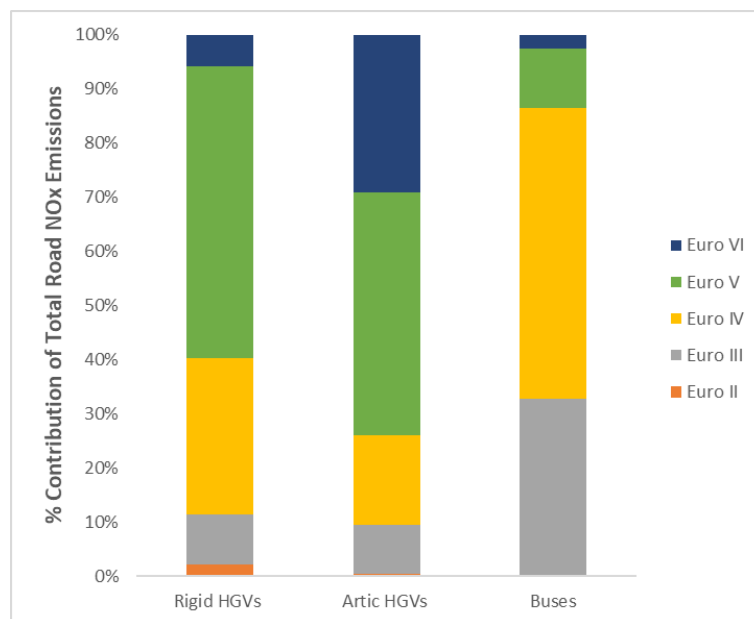


Figure 19: Percentage Contribution of Total Road NOx Emissions from Heavy Duty Vehicles by Euro Class Type (2019 Baseline)

Table 6: Percentage Contribution of Total Road Emissions from Light Duty Vehicles by Euro Class Type (2019)

Euro Standard	Petrol Cars (%)	Diesel Cars (%)	Diesel LGVs (%)
Euro 1	2.7	0.1	0.0
Euro 2	4.7	0.1	0.5
Euro 3	6.9	2.1	1.2
Euro 4	33.3	27.0	13.8
Euro 5	25.3	48.5	50.8
Euro 6	27.1	22.2	33.7

Table 7: Percentage Contribution of Total Road Emissions from Heavy Duty Vehicles by Euro Class Type (2019)

Vehicle Type	Rigid HGVs	Artic HGVs	Buses
Euro II	2.1	0.5	0.3
Euro III	9.3	9.0	32.5
Euro IV	28.8	16.7	53.7
Euro V	53.9	44.9	11.0
Euro V	5.8	29.0	2.5
Euro VI	2.1	0.5	0.3

- 3.24 Figure 18 and Table 6 indicate that the majority of NO_x emissions from Petrol Cars in 2019 are from Euro 4 vehicles (33.3%), while for Diesel Cars and LGVs, Euro 5 vehicles emit the highest proportion of NO_x (48.5% and 50.8%, respectively). In terms of HDVs, Figure 19 and Table 7 indicate that the majority of NO_x emissions from Rigid and Artic HGVs in 2019 are from Euro V vehicles (53.9% and 44.9%, respectively), while for Buses/Coaches, the majority of emissions are from Euro IV vehicles (53.7%).
- 3.25 The ANPR data (after manual assignment of Euro classes as described in Paragraph 0) show that approximately 18% of the bus fleet within Maidstone centre in 2021 are Euro III vehicles and 43% are Euro IV vehicles. This is taken to indicate an older than average bus fleet, although this assumption should be treated with some caution (see Paragraph 0).
- 3.26 It should be noted that these proportions are calculated based on a series of assumptions (as described in Paragraph 0), and are estimated for 2019 using Defra's EFT, based on ANPR data collected in 2021, corrected to 2019 where possible.

4 Summary

- 4.1 Detailed modelling on Upper Stone Street has shown that the predicted annual mean nitrogen dioxide concentrations in 2019 exceed the objective on the one-way section of that road, but not at locations of relevant exposure elsewhere. The majority of road NO_x emissions on Upper Stone Street in 2019 can be attributed to diesel vehicles; primarily cars, followed by buses and coaches, rigid HGVs and LGVs.
- 4.2 Based on an analysis of the monitoring data within Maidstone between 2015 and 2019, and a modelling study covering central Maidstone and the A229, it is recommended that the extent of the AQMA is reduced to cover Upper Stone Street only. It is considered that the AQMA can be revoked in northern Maidstone and the M20 in that area, Barming and west Maidstone, and Loose Road, Sutton Road and Sheal's Crescent in central Maidstone.
- 4.3 Future (2022) modelling scenarios show that predicted annual mean nitrogen dioxide concentrations continue to fall within the study area without any intervention to reduce road NO_x emissions, however, exceedances of the annual mean nitrogen dioxide objective are predicted to persist adjacent to Upper Stone Street. Assuming that all buses and coaches either meet Euro VI emission standard, or that all buses and coaches are converted to electric vehicles, further reduces the predicted concentrations and the number of exceedances, but not to the extent that all receptors are predicted to meet the objective.

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6 Glossary

AADT	Annual Average Daily Traffic
ADMS-Roads	Atmospheric Dispersion Modelling System model for Roads
ANPR	Automatic Number Plate Recognition
ASR	Annual Status Report
AQC	Air Quality Consultants
AQMA	Air Quality Management Area
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
EFT	Emission Factor Toolkit
Exceedance	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
HDV	Heavy Duty Vehicles (> 3.5 tonnes)
HMSO	Her Majesty's Stationery Office
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
kph	Kilometres Per hour
LAQM	Local Air Quality Management
LDV	Light Duty Vehicles (<3.5 tonnes)
LGV	Light Goods Vehicle
MBC	Maidstone Borough Council
µg/m³	Microgrammes per cubic metre
NO	Nitric oxide
NO₂	Nitrogen dioxide
NO_x	Nitrogen oxides (taken to be NO ₂ + NO)
Objectives	A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the standards should be achieved by a defined date. There are also vegetation-based objectives for sulphur dioxide and nitrogen oxides

OGV	Other Goods Vehicle
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal
TEMPro	Trip End Model Presentation Program

7 Appendices

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A3	Review of 20 mph Speed Limits	45

Professional Experience

Dr Clare Beattie, BSc (Hons) MSc PhD CSci MEnvSc MIAQM

Dr Beattie is an Associate Director with AQC, with more than 20 years' relevant experience. She has been involved in air quality management and assessment, and policy formulation in both an academic and consultancy environment. She has prepared air quality review and assessment reports, strategies and action plans for local authorities and has developed guidance documents on air quality management on behalf of central government, local government and NGOs. She has led on the air quality inputs into Clean Air Zone feasibility studies and has provided support to local authorities on the integration of air quality considerations into Local Transport Plans and planning policy processes. Dr Beattie has appraised local authority air quality assessments on behalf of the UK governments, and provided support to the Review and Assessment helpdesk. She has carried out numerous assessments for new residential and commercial developments, including the negotiation of mitigation measures where relevant. She has also acted as an expert witness for both residential and commercial developments. She has carried out BREEAM assessments covering air quality for new developments. Dr Beattie has also managed contracts on behalf of Defra in relation to allocating funding for the implementation of air quality improvement measures. She is a Member of the Institute of Air Quality Management, Institution of Environmental Sciences and is a Chartered Scientist.

Dr Kate Wilkins, BSc (Hons) MSc PhD MEnvSc MIAQM

Dr Wilkins is a Senior Consultant with AQC with eight years' postgraduate and work experience in the field of Environmental and Earth Sciences. Since joining AQC in January 2018, she has undertaken numerous air quality impact assessments for road traffic, combustion plant and construction dust throughout the UK for both standalone assessments and for EIAs, and has also prepared local authority reports and literature reviews. She has contributed her technical skills in programming and specialist software to a range of large-scale projects, including the third runway at Heathrow airport. Previously, Kate completed a PhD at the University of Bristol, researching atmospheric dispersion modelling and satellite remote sensing of volcanic ash. Prior to her PhD she spent a year working at the Environment Agency in Flood Risk Management. She is a Member of both the Institute of Air Quality Management and the Institution of Environmental Sciences.

George Chousos, BSc MSc AMEnvSc AMIAQM

Mr Chousos is an Assistant Consultant with AQC, having joined in May 2019. Prior to joining AQC, he completed an MSc in Air Pollution Management and Control at the University of Birmingham, specialising in air pollution control technologies and management, and data processing using R. He also holds a degree in Environmental Geoscience from the University of Cardiff, where he undertook

a year in industry working in the field of photo-catalytic technology. He is now gaining experience in the field of air quality monitoring and assessment.

Helen Pearce, BSc (Hons) MSc

Miss Pearce is an Assistant Consultant with AQC, having joined in September 2021. Prior to joining AQC she was based at the University of Birmingham, completing a BSc in Geography, MSc in Applied Meteorology and Climatology, and is currently awaiting her PhD examination. Her PhD research specialised in air quality modelling where she developed a range of tools to estimate real-time pollutant concentrations on Birmingham's road network, and to quantify the impacts of Low Traffic Neighbourhoods on residential population exposure. Additionally, she provided the air quality modelling expertise on the NERC-funded project, 'GI4RAQ' (Green Infrastructure for Roadside Air Quality), to quantitatively assess the impacts of 'green' interventions in street environments. She is now gaining experience in the field of air quality monitoring and assessment.

Joe Rondel

Mr Rondel is an Environmental Monitoring Technician with AQC, having joined the Company in 2021. Prior to joining AQC he gained a degree in Geography from the University of Manchester, specialising in biological science and economics. He is now gaining experience in the field of air quality monitoring, including passive and active sampling techniques.

Modelling Methodology

Assumptions

It is necessary to make a number of assumptions when carrying out an air quality assessment; in order to account for some of the uncertainty in the approach, as described in Section 3, assumptions made have generally sought to reflect a realistic worst-case scenario. Not least, 2019 was used as the modelled year to provide a worst-case approach. Key assumptions made in carrying out this assessment include:

- a high proportion of the bus/coach vehicle category within the ANPR dataset does not have a Euro class assigned. Intelligent Data, who collected the data, have advised that the Euro status data is derived from the Motor Vehicle Registration Information System (MVRIS; a database of new vehicle registration details in the UK for cars and commercial vehicles <6 t gross vehicle weight). For commercial vehicles and buses/coaches of 6 t gross vehicle weight and over, this data service launched in 2016, thus for heavy vehicles registered before 2016, there are a high proportion of missing Euro class records in DVLA database. This will have skewed the Euro mix for these vehicles towards later classes. To mitigate this effect, classes for bus/coach, OGV1 and OGV2 vehicles have been assigned based on the vehicle registration date (where available) where no Euro class is already defined. Where no registration date is available, where possible, classes have been assigned based on the vehicle model and make;
- the vehicle categories for HGVs used within the ANPR dataset do not match the definitions within the EFT; EFT uses Rigid and Articulated HGV categories, while the ANPR separates HGVs by Other Goods Vehicles groups (OGV1; rigid vehicles >3.5 tonnes with two or three axles, and OGV2; rigid vehicles with four or more axles and articulated vehicles). Based on the proportions of these vehicles within the default EFT fleet mix, it is considered appropriate to assume that all OGV1 vehicles represent Rigid HGVs and OGV2 vehicles represent Articulated HGVs within the modelling;
- within the EFT, it has been assumed that that all electric and electric/hybrid petrol cars are petrol cars and all electric/hybrid diesel cars are diesel cars;
- it has been assumed that the EFT fleet projections for 2019 and 2022 are representative of those years, based on ANPR data collected in 2021;
- all buses and coaches have been removed from the fleet in the 2022 EV Bus scenario to simulate all buses having been converted to EVs;
- Mote Road, Upper Stone Street and Loose Road are on gradients;
- it has been assumed that the East Malling meteorological monitoring station appropriately represents conditions in the study area (this is discussed further in Paragraph 0); and

- sections of Upper Stone Street are located within street canyons (this is discussed further Paragraph 0).

Background Concentrations

Background concentrations have been defined using Defra's 2018-based background maps (Defra, 2021b), calibrated against local measurements made at the Maid45 background diffusion tube monitoring site. The measured nitrogen dioxide concentrations at this site in 2019 was 1.10 times higher than the 2019 Defra mapped background concentrations. All mapped nitrogen dioxide background concentrations for the grid squares covering the study area have therefore been adjusted by applying a factor of 1.10.

Model Inputs

Predictions have been carried out using the ADMS-Roads dispersion model (v5). The model requires the user to provide various input data, including emissions from each section of road and the road characteristics (including road width, street canyon height and porosity, where relevant). Vehicle emissions have been calculated based on vehicle flow, composition and speed data using the EFT (Version 11.0) published by Defra.

Vehicle fleet composition data have been based on ANPR data, provided by Intelligent Data, which were collected on Upper Stone Street between 29 September and 5 October 2021. The dataset provides traffic counts and a breakdown of vehicles by type and Euro class. This information has been used together with modelled traffic flows for 2019 in the area (provided by KCC), to estimate traffic flows, fleet composition and speed across the area of focus in 2019. Defra's EFT has been used to estimate vehicle emissions using the Fleet Projection Tool to factor the 2021 ANPR fleet mix by Euro class back to the 2019 baseline year. Traffic counts for Sheal's Crescent have been based on counts provided by DfT (2021). The 2019 AADT flows have been factored forwards to the future assessment year of 2022 using growth factors derived using the TEMPro System v7.2 (DfT, 2017). Speeds have been based on those provided by KCC, with some having been adjusted based on professional judgement, taking account of the road layout, speed limits and the proximity to junctions.

The traffic data used in this assessment are summarised in Table AError! No text of specified style in document..1. The diurnal flow profile for the traffic has been derived using the ANPR data, and the monthly flow profile has been derived from the national profiles published by DfT (2020).

Table A Error! No text of specified style in document..1: **Summary of Traffic Data used in the Assessment**

Road Link	AADT	% Petrol Car	% Diesel Car	% LGV	% Rigid HGV	% Artic HGV	% Bus/Coach	% Motor Cycle
2019 Baseline								
Lower Stone Street	11,983 – 18,803	44.0 - 44.5	36.1 - 36.5	13.4 - 13.6	2.3 - 2.8	1.7 - 2.1	1.4 - 1.7	0.0
Knightrider Street	4,923 – 5,646	44.8	36.6 - 36.7	13.6	2.1	1.5 - 1.6	1.3	0.0
Mote Road (A249)	1,098 – 6,115	44.8 - 47	36.7 - 38.5	13.6 - 14.3	0.1 - 2.1	0.0 - 1.5	0.0 - 1.3	0.0
Wat Tyler Way (A249)	2,545 – 5,247	44.6 - 45.6	36.5 - 37.3	13.6 - 13.9	1.4 - 2.3	1.0 - 1.7	0.8 - 1.4	0.0
Upper Stone Street (A229) – west of Mote Road	11,007	43.6	35.7	13.3	3.2	2.4	1.9	0.0
Upper Stone Street (A229) – south of Mote Road	13,329 – 17,300	44.0 - 44.4	36.0 - 36.4	13.4 - 13.5	2.4 - 2.8	1.8 - 2.1	1.5 - 1.7	0.0
Loose Road (A229) – north of Sheal's Crescent	13,329 – 15,544	44.3 - 44.7	36.3 - 36.6	13.5 - 13.6	2.2 - 2.5	1.6 - 1.8	1.3 - 1.5	0.0
Sheal's Crescent	12,434	44.1	36.1	12.9	2.5	1.9	1.5	1.0
Loose Road (A229) – north of Park Way	10,494 – 18,165	43.3 - 43.7	35.5 - 35.8	13.2 - 13.3	3.1 - 3.4	2.3 - 2.5	1.9 - 2.1	0.0
Loose Road (A229) – north of Sutton Road (A274)	22,360 – 24,443	44.1 - 44.3	36.1 - 36.3	13.4 - 13.5	2.5 - 2.7	1.9 - 2.0	1.5 - 1.6	0.0
Loose Road (A229) – west of Sutton Road (A274)	13,752	44.4	36.4	13.5	2.4	1.8	1.5	0.0
Sutton Road (A274)	13,920	44.8	36.7	13.7	2.0	1.5	1.2	0.0
2022 Baseline & 2022 Euro VI Bus								
Lower Stone Street	12,534 – 19,668	44.0 - 44.5	36.1 - 36.5	13.4 - 13.6	2.3 - 2.8	1.7 - 2.1	1.4 - 1.7	0.0
Knightrider Street	5,150 – 5,906	44.8	36.6 - 36.7	13.6	2.1	1.5 - 1.6	1.3	0.0
Mote Road (A249)	1,149 – 6,397	44.8 - 47	36.7 - 38.5	13.6 - 14.3	0.1 - 2.1	0.0 - 1.5	0.0 - 1.3	0.0
Wat Tyler Way (A249)	2,662 – 5,488	44.6 - 45.6	36.5 - 37.3	13.6 - 13.9	1.4 - 2.3	1.0 - 1.7	0.8 - 1.4	0.0
Upper Stone Street (A229) – west of Mote Road	11,514	43.6	35.7	13.3	3.2	2.4	1.9	0.0
Upper Stone Street (A229) – south of Mote Road	13,942 – 18,095	44.0 - 44.4	36.0 - 36.4	13.4 - 13.5	2.4 - 2.8	1.8 - 2.1	1.5 - 1.7	0.0
Loose Road (A229) – north of Sheal's Crescent	13,942 – 16,259	44.3 - 44.7	36.3 - 36.6	13.5 - 13.6	2.2 - 2.5	1.6 - 1.8	1.3 - 1.5	0.0
Sheal's Crescent	13,005	44.1	36.1	12.9	2.5	1.9	1.5	1.0
Loose Road (A229) – north of Park Way	10,977 – 19,001	43.3 - 43.7	35.5 - 35.8	13.2 - 13.3	3.1 - 3.4	2.3 - 2.5	1.9 - 2.1	0.0

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Loose Road (A229) – north of Sutton Road (A274)	23,388 – 25,568	44.1 - 44.3	36.1 - 36.3	13.4 - 13.5	2.5 - 2.7	1.9 - 2.0	1.5 - 1.6	0.0
Loose Road (A229) – west of Sutton Road (A274)	14,385	44.4	36.4	13.5	2.4	1.8	1.5	0.0
Sutton Road (A274)	14,560	44.8	36.7	13.7	2.0	1.5	1.2	0.0
2022 EV Bus								
Lower Stone Street	12,534 – 19,668	44.8 - 45.2	36.7 - 37	13.6 - 13.8	2.3 - 2.8	1.7 - 2.1	0.0	0.0
Knightrider Street	5,150 – 5,906	45.3 - 45.4	37.1	13.8	2.1	1.6	0.0	0.0
Mote Road (A249)	1,149 – 6,397	45.4 - 47.0	37.1 - 38.5	13.8 - 14.3	0.1 - 2.1	0.0 - 1.6	0.0	0.0
Wat Tyler Way (A249)	2,662 – 5,488	45.2 - 45.9	37 - 37.6	13.8 - 14.0	1.4 - 2.3	1.0 - 1.7	0.0	0.0
Upper Stone Street (A229) – west of Mote Road	11,514	44.4	36.4	13.5	3.2	2.4	0.0	0.0
Upper Stone Street (A229) – south of Mote Road	13,942 – 18,095	44.8 - 45.1	36.7 - 36.9	13.6 - 13.7	2.4 - 2.8	1.8 - 2.1	0.0	0.0
Loose Road (A229) – north of Sheal's Crescent	13,942 – 16,259	45.0 - 45.3	36.9 - 37.1	13.7 - 13.8	2.2 - 2.5	1.7 - 1.9	0.0	0.0
Sheal's Crescent	13,005	44.8	36.6	13.1	2.6	1.9	0.0	1.0
Loose Road (A229) – north of Park Way	10,977 – 19,001	44.2 - 44.5	36.2 - 36.4	13.5 - 13.6	3.1 - 3.5	2.3 - 2.6	0.0	0.0
Loose Road (A229) – north of Sutton Road (A274)	23,388 – 25,568	44.8 - 45	36.7 - 36.9	13.7	2.5 - 2.7	1.9 - 2.0	0.0	0.0
Loose Road (A229) – west of Sutton Road (A274)	14,385	45.1	36.9	13.7	2.4	1.8	0.0	0.0
Sutton Road (A274)	14,560	45.4	37.2	13.8	2.1	1.5	0.0	0.0

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Figure AError! No text of specified style in document..1 shows the road network included within the model, along with the speed at which each link was modelled.



Figure AError! No text of specified style in document..1: Modelled Road Network & Speed

Imagery ©2021 Google, Imagery ©2021 Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies

For the purposes of modelling, it has been assumed that sections of Upper Stone Street are within street canyons formed by buildings. This road has a number of canyon-like features, which reduce dispersion of traffic emissions, and can lead to concentrations of pollutants being higher here than they would be in areas with greater dispersion. Sections of Upper Stone Street have, therefore, been modelled as street canyons using ADMS-Roads' advanced canyon module, with appropriate input parameters determined from local mapping. The advanced canyon module has been used, the input data for which have been published by Cambridge Environmental Research Consultants (CERC, 2016), who developed the ADMS models. The modelled canyons are shown in Figure AError! No text of specified style in document..2.



Figure AError! No text of specified style in document..2: **Modelled Canyons**

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Hourly sequential meteorological data in sectors of 10 degrees from East Malling for 2019 have been used in the model. The East Malling meteorological monitoring station is located 5.5 km to the northwest of Maidstone. It is deemed to be the nearest monitoring station representative of meteorological conditions in the vicinity of Maidstone; both are located at inland locations in the south-east of England, where they will be influenced by the effects of inland meteorology. A wind rose for the site for the year 2019 is provided in Figure A

Error! No text of specified style in document..3. The station is operated by the UK Met Office. Raw data were provided by the Met Office and processed by AQC for use in ADMS. Meteorological model input parameters are summarised in Table A

Error! No text of specified style in document..2.

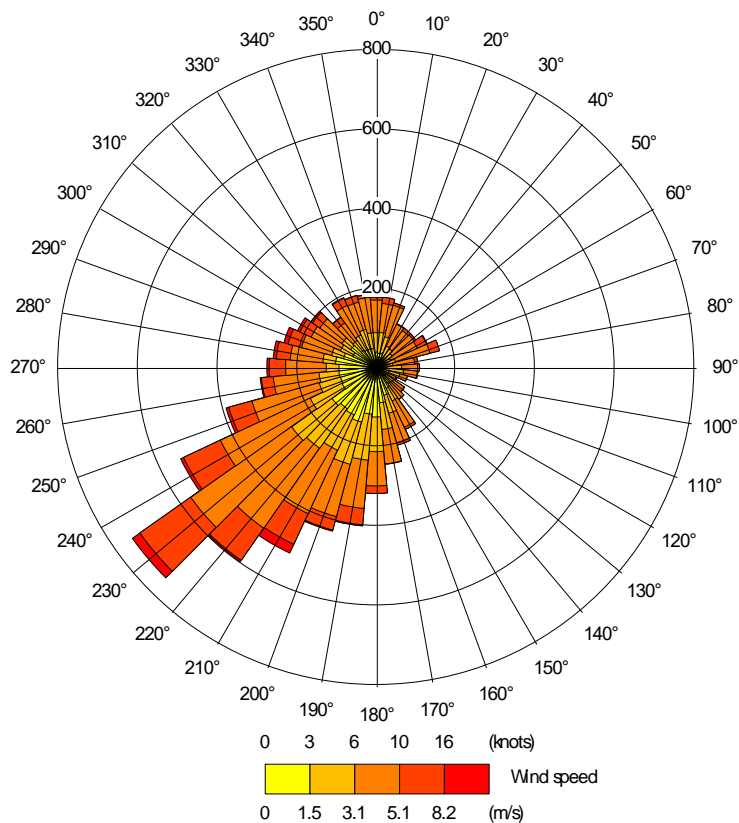


Figure A Error! No text of specified style in document..3: **East Malling 2019 Wind Rose**

Table A Error! No text of specified style in document..2: **Summary Model Inputs**

Model Parameter	Value Used
Terrain Effects Modelled?	Yes – 6 km x 6 km Cartesian grid at 50m resolution
Variable Surface Roughness File Used?	Yes – 6 km x 6 km Cartesian grid at 50m resolution
Urban Canopy Flow Used?	No
Gradients Modelled?	Yes
Advanced Street Canyons Modelled?	Yes
Noise Barriers Modelled?	No
Meteorological Monitoring Site	East Malling
Meteorological Data Year	2019
Dispersion Site Surface Roughness Length (m)	Variable
Dispersion Site Minimum MO Length (m)	30
Met Site Surface Roughness Length (m)	0.1
Met Site Minimum MO Length (m)	1

Model Verification

In order to ensure that ADMS-Roads accurately predicts local concentrations, it is necessary to verify the model against local measurements. The model has been run to predict the annual mean concentrations during 2019 at the CM3 automatic monitor, and Maid19, Maid53, Maid56, Maid81,

Maid96, Maid98, Maid111, Maid122, Maid123, Maid127 and Maid132 diffusion tube monitoring sites. The locations of the monitoring sites are shown in **Figure 3**.

Most nitrogen dioxide (NO₂) is produced in the atmosphere by reaction of nitric oxide (NO) with ozone. It is therefore most appropriate to verify the model in terms of primary pollutant emissions of nitrogen oxides (NO_x = NO + NO₂).

The model output of road-NO_x (i.e., the component of total NO_x coming from road traffic) has been compared with the 'measured' road-NO_x. Measured road-NO_x has been calculated from the measured NO₂ concentrations and the predicted background NO₂ concentration using the NO_x from NO₂ calculator (Version 8.1) available on the Defra LAQM Support website.

The unadjusted model has under predicted the road-NO_x contribution at several monitoring locations; this is a common experience with this and most other road traffic emissions dispersion models. An adjustment factor has been determined as the slope of the best-fit line between the 'measured' road contribution and the model derived road contribution, forced through zero (Figure AError! No text of specified style in document..4). The calculated adjustment factor of **2.0792** has been applied to the modelled road-NO_x concentration for each receptor to provide adjusted modelled road-NO_x concentrations.

The total nitrogen dioxide concentrations have then been determined by combining the adjusted modelled road-NO_x concentrations with the predicted background NO₂ concentration within the NO_x to NO₂ calculator. Figure AError! No text of specified style in document..5 compares final adjusted modelled total NO₂ at each of the monitoring sites to measured total NO₂.

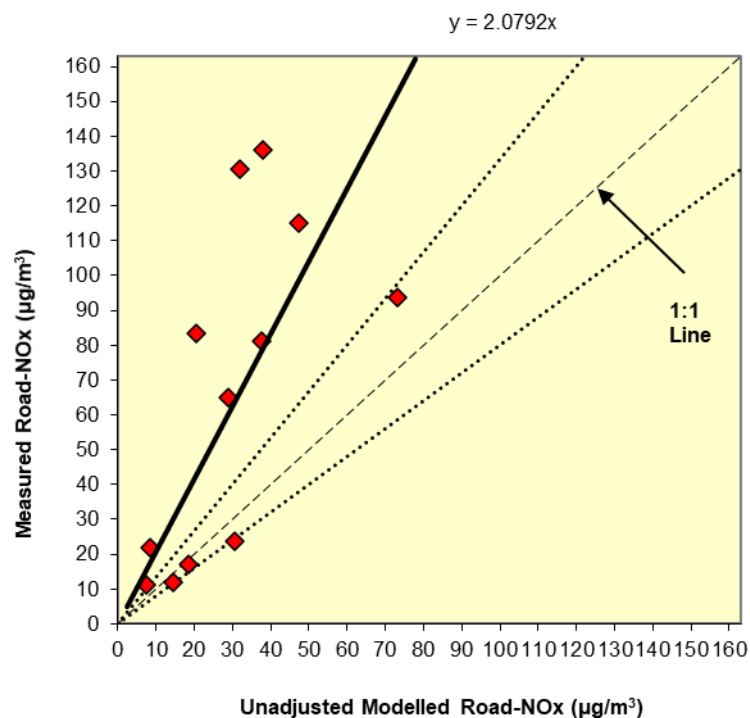


Figure AError! No text of specified style in document..4: Comparison of Measured Road NO_x to Unadjusted Modelled Road NO_x Concentrations. The dashed lines show ± 25%.

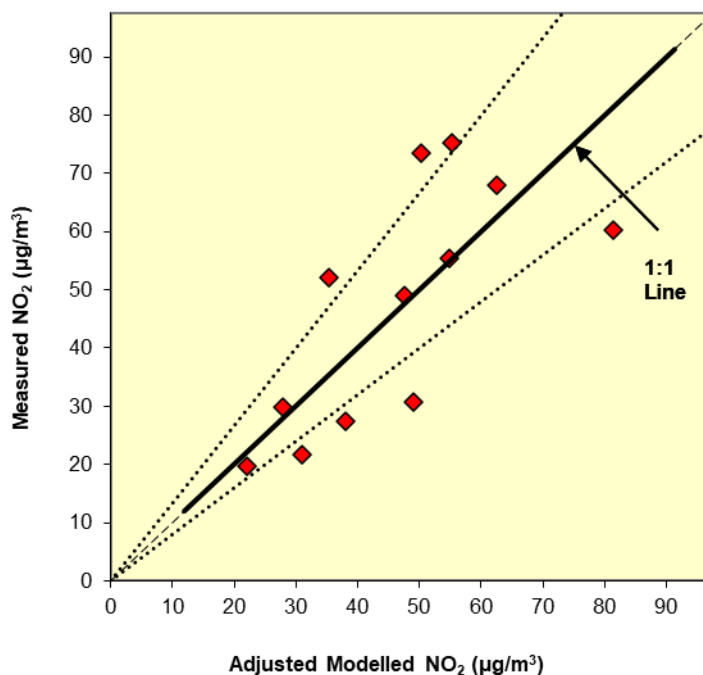


Figure A Error! No text of specified style in document..5: **Comparison of Measured Total NO₂ to Final Adjusted Modelled Total NO₂ Concentrations. The dashed lines show ± 25%.**

Table A Error! No text of specified style in document..3 shows the statistical parameters relating to the performance of the model, as well as the 'ideal' values (Defra, 2021a). There is a large degree of scatter within the model results, as demonstrated by the high RMSE presented in Table A Error! No text of specified style in document..3. This is likely to be due to the uncertainty in the traffic data used within the model. However, the fractional bias is close to zero, indicating that the overall adjustment factor is appropriate for this data set.

Table A Error! No text of specified style in document..3: **Statistical Model Performance**

Statistical Parameter	Model-Specific Value	'Ideal' Value
Correlation Coefficient ^a	0.72	1
Root Mean Square Error (RMSE) ^b	13.65	0
Fractional Bias ^c	0.01	0

- ^a Used to measure the linear relationship between predicted and observed data. A value of zero means no relationship and a value of 1 means absolute relationship.
- ^b Used to define the average error or uncertainty of the model. The units of RMSE are the same as the quantities compared (i.e., µg/m³). TG16 (Defra, 2021a) outlines that, ideally, a RMSE value within 10% of the air quality objective (4 µg/m³) would be derived. If RMSE values are higher than 25% of the objective (10 µg/m³) it is recommended that the model is revisited.
- ^c Used to identify if the model shows a systematic tendency to over or under predict. Negative values suggest a model over-prediction and positive values suggest a model under-prediction.

Post-processing

The model predicts road-NO_x concentrations at each receptor location. These concentrations have been adjusted using the adjustment factor set out above, which, along with the background NO₂, has been processed through the NO_x to NO₂ calculator available on the Defra LAQM Support website. The traffic mix within the calculator has been set to “All other urban UK traffic”, which is considered suitable for the study area. The calculator predicts the component of NO₂ based on the adjusted road-NO_x and the background NO₂.

Review of 20 mph Speed Limits

One option being discussed for Upper Stone Street is a 20 mph speed limit. Because the changes are unlikely to have a large impact on overall average speed, but instead impact on stop start traffic, modelling using ADMS and average speed emission factors is unlikely to provide a robust assessment. An assessment could be undertaken using a microsimulation traffic model, however, at this stage it is considered that a better use of budget would be to undertake a brief literature review of all peer reviewed studies which have been undertaken to look at the impacts of 20 mph speed limits on emissions in different settings. This is provided below.

Previous applications and assessments of 20 mph speed limits in other UK locations have focused on reporting the wider implications of such schemes, such as reduced fatal injuries (Bornioli et al., 2020; Grundy et al., 2009), increased modal shift to active travel alternatives (Pilkington et al., 2018; Cairns et al., 2014; Warrington Borough Council, 2010), and decreased health inequalities (Dorling, 2014). The following paragraphs are, however, focused specifically on implications for road traffic emissions due to changes in the speed limit, and no other traffic calming methods.

There are numerous ways to estimate emissions from a fleet of vehicles including modelling and measurements. Those discussed here are based on modelling, and can be summarised by the umbrella terms of: average-speed based models and instantaneous (or modal) models.

The UK National Atmospheric Emissions Inventory (NAEI) provides the relationship between speed and emission factor for both NO_x and PM_{2.5}, available at: <https://naei.beis.gov.uk/data/ef-transport>, which are based on relationships within COPERT⁹. This method is based on the measurement of emissions over both pre-determined drive-cycles in a laboratory, and real-world driving emission measurements, the average speed of which is determined, and corresponding tailpipe emission rate assigned. The drive-cycles are completed for multiple vehicle types, Euro classes, and fuels. Using an average-speed method, for example in models used for Local Air Quality Management, such as this study, would always predict larger emissions by lowering the speed limit from 30 mph to 20 mph due to a decrease in operational engine efficiency. However, this assumes that vehicles are already travelling relatively freely at 30 mph, and would subsequently travel freely at 20 mph, which is unlikely to be the case in an urban environment.

Research has shown that prior to the implementation of 20 mph limits in other UK locations, vehicles were, on average, travelling below the 30 mph speed limit, for example, 25.1 mph in Calderdale (Calderdale Council, 2018). After 20 mph limits (sign only) were in place, typically measured speeds only reduced by an incremental amount: 2.7 mph in Bristol (Pilkington et al., 2018), 1.9 mph in Calderdale (Calderdale Council, 2018), and 1.4 mph in Birmingham (Birmingham City Council, 2018).

Furthermore, the average-speed approach neglects driving dynamics, such as short-lived acceleration and deceleration events where large proportions of emissions occur. Direct measurements of vehicle speeds and exhaust emissions have found that acceleration and deceleration events are reduced in

⁹ COPERT is a software tool developed by the European Environment Agency and is used widely to calculate national emissions from road transport in Europe

magnitude in 20 mph (European equivalent) limit zones, and therefore emissions of NO_x and PM_{2.5} reduce (Casanova and Fonseca, 2012).

Changes in such dynamics cannot be assessed by the average-speed methodology, but can be by instantaneous emissions models which account for vehicle specific power and engine load. AQC (2014) and Williams and North (2013) applied the AIRE emissions model to assess the potential impacts of 20 mph speed limits. Both studies suggest that lower speed limits have the potential to reduce NO_x emissions from road transport through smoother vehicle flows and less overall speed variation, the opposite conclusion than that of the average-speed based methodology.

Other local factors are also likely to have an influence on the net change in emissions due to the introduction of a 20 mph speed limit. Most previous studies have used passenger cars to measure or model outcomes, but if the fleet is dominated by HGVs these vehicles are likely to have a different emissions profile with changes to speed and acceleration. Additionally, road gradients also play an important role in vehicle emissions (Kean et al., 2003), but are yet to be fully investigated in relation to changes at lower speeds. Gradient is likely to be a major contributing factor on Upper Stone Street.

Overall, it still remains uncertain whether a 20 mph limit is likely to reduce road transport emissions. It is generally accepted that approaches which account for the impacts on overall vehicle flow and frequency of acceleration and deceleration events are likely to be more representative of real-world driving patterns than the average-speed approach (Davis, 2018). However, local factors such as the fleet mix and road gradient are also likely to play an important role in determining net emissions.

Therefore, for Upper Stone Street, although there is not clear evidence around the impacts of a 20 mph speed limit, it is judged that it is not likely to worsen air quality, and may provide some benefits, although these are unlikely to be measurable through monitoring.

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
ASR	Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by National Highways
EU	European Union
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO ₂	Sulphur Dioxide

References

- Local Air Quality Management Technical Guidance LAQM.TG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Policy Guidance LAQM.PG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Technical Guidance LAQM.TG16. April 2021. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Policy Guidance LAQM.PG16. May 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- <http://www.phoutcomes.info/public-health-outcomes-framework#page/0/gid/1000043/pat/6/par/E12000008/ati/101/are/E07000114>
- https://laqm.defra.gov.uk/documents/LAQM%20NO2%20Performance%20data_Up%20to%20March%202021_v2.pdf
- <http://www.phoutcomes.info/public-health-outcomes-framework#page/0/gid/1000043/pat/6/par/E12000008/ati/101/are/E07000112>
- Maidstone Borough Council 2015 Updating and Screening Assessment
- [http://laqm.defra.gov.uk/documents/LAQM-AIR-PT-Rounds-1-12-\(April-2014-February-2016\)-NO2-report.pdf](http://laqm.defra.gov.uk/documents/LAQM-AIR-PT-Rounds-1-12-(April-2014-February-2016)-NO2-report.pdf)
- Maidstone Borough Council Maidstone Town Air Quality Action Plan 2010
- Maidstone Borough Council Low Emission Strategy 2018

Housing, Health and Environment Policy Advisory Committee

10 October 2023

Property Acquisition for 1,000 Affordable Homes Programme

Timetable	
Meeting	Date
Housing, Health, and Environment Policy Advisory Committee	10 October 2023
Cabinet	25 October 2023

Will this be a Key Decision?	Yes
Urgency	Not Applicable
Final Decision-Maker	Cabinet
Lead Head of Service	Philip Morris – Head of New Business and Housing Development
Lead Officer and Report Author	Christopher Nixon – Development Project Manager
Classification	<p>Public Report with Exempt Private Appendices</p> <p>The information contained within the Appendices has been considered exempt under the following paragraph of part 1 of schedule 12A to the Local Government Act 1972: -</p> <p>3 = Information relating to the financial or business affairs of any particular person (including the authority holding that information)</p> <p>Public Interest Test</p> <p>On applying the public interest test, the public interest in non- disclosure of the report outweighs the public interest in disclosing this information. The reasons in favour of disclosure are the public interest in ensuring value for money and the reasons against disclosure are the harm to the Councils financial position in</p>

	respect of a commercial transaction. Any disclosure of such information may compromise the negotiating position of the Council. Keeping the information exempt is therefore in the public interest.
Wards affected	South

Executive Summary

The Council has an ambitious housebuilding programme that is funded via the Council's adopted Capital Programme. This housebuilding programme encompasses homes for; Affordable Housing (AH), Private Rented Sector Housing (PRS) and on occasion a limited amount of exposure to Market Sale (MS) Housing too. The development strategy for this programme was approved by the Policy & Resources Committee in January 2022, and the proposals within this report are consistent with delivering that strategy.

Purpose of Report

For Consideration and Recommendation to Cabinet

The Housing, Health and Environment Advisory Committee make the following recommendations to Cabinet:

1. Approve the financial returns for the proposed acquisition as shown in Exempt Appendix 3 of this report, which supports the Housing Development and Regeneration Investment Plan and overall Development Strategy, are approved.
2. Give delegated authority to the Director of Finance, Resources and Business Improvement to:
 - a) Negotiate terms for the purchase of the proposed acquisition for the sum as shown in the Exempt Appendix 3 of this report.
 - b) Procure and enter into all such deeds, agreements, contracts and documents which may be required to facilitate the purchase of the site, and the subsequent redevelopment works required to deliver the scheme referred to in this report. Including (but not limited to) any related appointments such as suitably qualified consultants and a Contractor if required.
 - c) Subject to satisfactory conclusion of all due diligence to negotiate and finalise and complete all legal formalities, deeds and agreements which may be required to facilitate the purchase.
 - d) Negotiate and agree any lease between The Council and Maidstone Property Holdings.
3. Authorise the Head of Mid Kent Legal Services to appoint the Solicitors required to negotiate and complete the necessary contract documentation, deeds and agreements associated with the purchase and construction works

on the terms as agreed by the Director of Finance, Resources & Business Improvement.

Property Acquisition

1. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<p>Impact on Corporate Priorities</p>	<p>The four Strategic Plan objectives are:</p> <ul style="list-style-type: none"> • Embracing Growth and Enabling Infrastructure • Safe, Clean and Green • Homes and Communities • A Thriving Place <p>The purchase of the homes described in this report supports the Councils Development Strategic plan in building 1,000 Affordable Homes, within the agreed capital spend of 200m.</p> <p>Accepting the recommendations will materially improve the Council’s ability to achieve and support Embracing Growth and Enabling Infrastructure and Homes and Communities.</p>	<p>William Cornall Director of Regeneration & Place</p>
<p>Cross Cutting Objectives</p>	<p>The four cross-cutting objectives are:</p> <ul style="list-style-type: none"> • Heritage is Respected • Health Inequalities are Addressed and Reduced • Deprivation and Social Mobility is Improved • Biodiversity and Environmental Sustainability is respected <p>The report recommendations support the achievement of the Deprivation and Social Mobility is improved cross cutting objective by delivering a high-quality development of affordable homes.</p>	<p>William Cornall Director of Regeneration & Place</p>
<p>Risk Management</p>	<p>Already covered in the risk section.</p>	<p>William Cornall Director of Regeneration & Place</p>

Financial	Monies are allocated in the capital programme for Private Rented Sector housing and provision of affordable homes. This scheme would draw upon those resources already allocated, subject to the risks set out in this report and to the initiatives described in the report to close any potential viability gap. The site will be managed by MBC and an allowance has been allocated in the Appraisal for general upkeep of the site.	Paul Holland & Adrian Lovegrove Senior Finance Manager (Client Accountancy) Philip Morris Head of New Business and Housing Development
Staffing	We will deliver the recommendations with our current staffing. However, we will employ external consultants to help facilitate and oversee the redevelopment works with the appointed contractor.	William Cornall Director of Regeneration & Place
Legal	<p>MBC has statutory power under section 1 of the Localism Act 2011 to do anything that individuals generally may do and under section 111 of the Local Government Act 1972 MBC has power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions.</p> <p>S120(1)(2) of the 1972 Act also enables MBC to acquire land to be used for the benefit, improvement or development of their area or for the purpose of discharging MBC's functions.</p> <p>MBC must follow its internal procurement rules as detailed in the Constitution and comply with all legal requirements as may be applicable from time to time.</p> <p>Acting on the recommendations is within MBC's powers as set out in the above statutory provisions.</p>	Robin Harris (Team Leader Contentious and Corporate Governance)

Information Governance	The recommendations do not impact the personal information (as defined in UK GDPR and Data Protection Act 2018) that the Council processes.	Lauren McNicol & Georgia Harvey Information Governance Team
Equalities	The recommendations do not propose a change in service therefore will not require an equalities impact assessment	Nicola Toulson Equalities & Communities Officer
Public Health	We recognise that the recommendations will not negatively impact on population health or that of individuals.	Philip Morris Head of New Business & Housing Development
Crime and Disorder	The recommendation will not have a negative impact on Crime and Disorder.	Philip Morris Head of New Business & Housing Development
Procurement	On accepting the recommendations, MBC will then follow procurement exercises for commissioning consultancy advice to secure the works contract. We will complete those exercises in line with financial procedure rules.	Philip Morris Head of New Business & Housing Development
Biodiversity and Climate change	Providing new affordable and market rent homes will have a significant impact on the Council's carbon footprint and 2030 Net Zero commitment. Highly thermally efficient, low carbon heating, and climate adapted housing, as well as consideration for shared heating solutions, renewable energy, active travel, and biodiversity enhancements as part of the development strategy will ensure alignment with the Biodiversity and Climate Change Action Plan. In line with the Biodiversity and Climate Change Action Plan, two particular actions should be considered	James Wilderspoon Biodiversity and Climate Change Manager

	<p>as part of the developments:</p> <p>Action 9.3 Deliver Policy that ensures sustainability criteria is used for all Maidstone Borough Council construction of new buildings (offices, housing, leisure facilities) and sustainability criteria is part of decision-making process for all Maidstone Borough Council building acquisitions, to ensure buildings owned by the council are sustainable, future proofed, and align with our net zero commitment.</p> <p>Action 9.4 Establish criteria for investment in climate change and biodiversity and invest to save schemes (e.g. renewables, heat networks). These will consider relative impact in terms of carbon reduction and ease of delivery, such that expenditure is focused on deliverable, affordable initiatives that maximise impact on the carbon reduction targets.</p>	
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2 INTRODUCTION AND BACKGROUND

2.1 When appraising new housing development opportunities, the New Business and housing Development Team consider proposals against the following standard risk headings: -

- Site location and ownership.
- Town Planning Status.
- Schedule of accommodation, tenure mix and parking ratio.
- Quality – Maidstone Building for Life 12.
- Housing Management.
- Deal structure.
- Contractor procurement.
- Financial viability.
- Delivery programme.
- Professional team.

2.2 The opportunity proposed in this report is fully appraised against these standard risk headings in the exempt Appendix 1.

3 **AVAILABLE OPTIONS**

- 3.1 Option 1: The Committee could choose not to recommend the approval of the purchase of the proposed acquisition to Cabinet. The Council would however lose an excellent opportunity to purchase a completed development of 13 houses with a good mix of both AR and MR.
 - 3.2 Option 2: The Committee recommends to Cabinet that the purchase of the site and units on a turnkey basis is approved on the agreed terms. It will assist towards much needed affordable accommodation in the Borough and contribute towards the Council 1,000 Affordable Homes delivery target.
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4. **PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 4.1 **Option 2** is the recommended option. A significant amount of work and negotiation has been completed by officers to reach this accepted offer stage with the vendor. The scheme once completed would provide 13 new houses (6 x AR and 7 x MR) and represents a good opportunity which supports the 1,000 Affordable Homes Development Strategy.
 - 4.2 The acquisition will also deliver a number of much needed new houses rather than flats within a residential location, making a valuable contribution to the borough's identified affordable housing need.
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5 **RISK**

- 5.1 Please see exempt appendix 1

6 **CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 6.1 The issue will be considered by the HHE PAC on the 10th October 2023 with a view to the outcome being reported to Cabinet on 25th October 2023

7 **NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 7.1 The next steps, subject to the decision made by Cabinet, will be to secure the site with exchange and completion of contracts on the terms as agreed by the Director of Finance, Resources and Business Improvement, subject to RICS valuation, and satisfactory due diligence report and contract.
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8 **REPORT APPENDICES**

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

- Exempt Appendix 1: Risk Assessment
 - Exempt Appendix 2: Site Layout
 - Exempt Appendix 3: Financial Viability Outputs
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9 **BACKGROUND PAPERS**

9.1 Policy and Resources Committee Report "Affordable Housing Delivery by the Council" and Minute (No.157) of 19 January 2022

Agenda Item 13

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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