

KCC Highways, Transportation and Waste Consultation Response to MBC Draft Low Emission Strategy

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Theme 1 – Transport

Do you think the actions will be effective in improving AQ?

Yes. We support an emissions standard and driver behaviour training for buses and taxis. Reducing idling of vehicles whilst waiting at a bus stop/ taxi rank not only reduces emissions but is a visible action that helps to lead by example. MBC has control over taxi licensing so it would be a good idea to use this to positively influence the standard of vehicles and driver behaviour.

An emissions standard for buses could have a particularly significant impact, particularly on the town centre. As MBC suggest, it will be important to speak to bus operators at early stages as it will be costly to upgrade fleets, particularly for the smaller operators. We would support MBC's intention to bid for Government grants to help achieve this. The 11 electric hybrid buses used along the Route 71 by Arriva is a good example of this.

MBC was proactive in working with us to take advantage of the Government grant for electric vehicle infrastructure on local authority land. As such, Maidstone now has 7 Council owned EV charging points in the borough. Disappointingly the 2 MBC owned chargers are not connected to electricity successfully and therefore not yet available for use. We would suggest MBC make it a top priority to get the two chargers running at Maidstone Leisure Centre and The Mall car park, as infrastructure is not being made good use of. We would fully support MBC in installing further EV charging points.

The EV market is rapidly expanding and it is imperative that we keep pace by providing opportunities for people to charge their vehicles. KCC has recently decided to create a policy for on-street EV charging infrastructure, to help guide our work and make Kent as welcoming as possible for EV vehicle users. This will include an update to parking standards to support asking for EV charging infrastructure in all new developments. There are no timelines set as yet for the delivery of this policy, but we will consult with MBC through the EV partnership group. KCC Transport Innovations works with businesses across Kent to promote sustainable travel and subject to funding, offers capital grants up to £5,000. This could be used by businesses to install EV charging infrastructure or towards electric/ hybrid pool vehicles. There is also a Government grant called the Workplace Charging Scheme which offers a grant of £300 per charge point to businesses. We would welcome MBC promoting these opportunities to businesses in the borough. The stronger commitment to requiring EV charging infrastructure at new developments is to be welcomed, given the high costs of retrofitting.

Which action do you think will be most/least effective? Why?

An emissions standard for buses is likely to be the most effective measure, particularly in the town centre. This is because the volume of buses in the town centre is high, with idling at stops and in traffic.

Is there anything else we could do?

We suggest looking at opportunities to provide free/ low cost parking on the outskirts of town for a Park and Walk/ Cycle scheme. Some people are put off using the Park and Ride service as they wait in traffic on the bus to get into town. It can often be quicker to walk or cycle the last 1-2 miles, benefiting personal health by incorporating active travel and making journeys more convenient, as people can go direct to their end destination. KCC Transport Innovations team are eager to work with MBC on developing a Park and Walk/ Cycle scheme to promote this behaviour and reduce congestion in the town centre. We hope that this can be incorporated into the current review of parking and Park and Ride services being conducted by MBC.

We hope that the review of parking within the borough incorporates parking charges as this is integral to success. Ultimately the cost of parking has a significant influence on how people choose to travel into the town centre.

We note the decision for this strategy's actions to focus on vehicle emissions rather than modal shift, and the importance of it complementing but not duplicating work in the walking and cycling strategy. This approach seems sensible so long as there are appropriate actions elsewhere to encourage modal shift as part of a co-ordinated approach.

Theme 2 – Planning

Do you think the actions will be effective in improving AQ?

Yes. Using air quality to influence development is vital. This will help to evidence the need for high quality walking and cycling routes, EV charging infrastructure and public transport links.

Which action do you think will be most/least effective? Why?

The influence of Development Management on developments to mitigate impacts on air quality, such as prevention of street canyons. Everything starts with good design and this action has huge potential to make a difference.

Is there anything else we could do?

This strategy could reference the Local Transport Plan and Active Travel Strategy and acknowledge the importance of robust Travel Plans at new developments.

Theme 3 – Procurement

Do you think the actions will be effective in improving AQ?

If MBC takes a determined approach to influence its procurement practices this could be effective. However it would be easy for this theme to be watered down and not be effective.

Which action do you think will be most/least effective? Why?

Procurement of vehicles by the Council. Although MBC have just two vehicles, if these were replaced by electric vehicles it would show MBC are leading by example and have a direct impact.

Contracts relating to goods and services provided by the Council has the potential to be effective as MBC must have a large number of contracts with a large number of deliveries and journeys being made. However ultimately it will depend on how determined the approach is as to whether it makes a tangible difference.

Theme 4 – Carbon Management

See Theme 1 for comments on EV infrastructure and Theme 3 for MBC electric pool cars.

Theme 5 – Public Health

We support the idea of celebrating and showcasing best practice amongst businesses, particularly on a local level. We would encourage MBC to speak to the Sustainable Business Team and Transport Innovations team who are doing similar work across Kent.

Air quality is receiving increasing attention among the public but as it is unseen it is still widely ignored/ misunderstood. An awareness campaign could have a good impact on driver behaviour. Studies have shown that the most successful campaigns are those that both make people feel like they belong to a peer group, and make them think about themselves. So for example at a level crossing, more people turn their engines off when there are signs saying 'think about yourself and turn your engine off'.

Do you agree with the change to the AQMA to focus on the really poor AQ areas?

Yes. This approach is sensible in how it focuses on the worse affected areas, and those which exceed legal levels. However as motor vehicles will be travelling from outside these areas into the AQMA, many of the actions will need to extend beyond the new AQMA boundary.

Hi Duncan/Stuart ,

Please can this add this to consultation responses .. (Sorry its been so busy)

JAMES WILLIS SIMPLETON RESPONSE TO Low can Emission CONSULTATION.

Great work Cllrs and officers I recorded a comment from North Kent council that we are ahead of the game in Maidstone so well done, but so much to done if work together.

My comments are mainly transport related) can I recommend Cllr Hardwoods suggestions below are also looked at..

- Please can we request fleet condition request to applicant planning as referred to by Tony below.
- Make sure MBC practices what is preaches by end of this year with at least a gesture for Electric vehicles and some charging points (fix the shopping centre owned ones in Maidstone house would help)
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- MBC policy of xx communal fast car chargers per XX dwellings at in new developments in light on of recent (while consultation was on) announcement of the direction of travel by car manufacturers to move away from fossil fuels.
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- Sort out the bus station location and design and any canyon in the High seem deadly
- A cross-border joint study on cumulative effect Hermitage lane- MBC officers may to get a quote on how much this might cost-shared with T and M. Who informally there officer pollution he suggest this would be a good idea especially in view of the "unique" nature of this ribbon piecemeal application making up huge development with more sites coming forward (leading to up to 5000) . example why ;-Going back to 2014/5 It seems although Herm lane is only at dangerous post 40 NOX levels at AQMA'a at each end of it, the East of Herm Croudace application pollution studies done may not really have looked at full cumulative effect and we residents really deserve better in future applications coming forward across the 2 boroughs on Herm lane.

There is a petition going to JTB Oct 18th requesting this.

- Obv we must apply for funding as best we can from government tiny new pot to support this LES . However, can MBC arrange a Lobby meeting with our MP's asap to point out how toothless we are funding wise and that July government response was far to weak and did not include diesel for electric scrappage or serous scream offer conversation away dirties its Desiels

(Might be able to invite Client earth or other NGO to this meeting).

- Keep looking at an evening sustainable transport policy that includes clean public transport walking and cycling initiatives and perhaps look at automatic electric vehicles if they reduce congestion/pollution. Remembering it is said the very dangerous particulate pollution (2.5) can come from all vehicles (Tyres. brake dust engine wear and road surface) thus reduction in private vehicle usage is key.
- Better public awareness of how we monitoring advertising access to Kent air website and perhaps event to answer questions from the public

- Use the river where possible.
- Keep and evolve Park and ride and encourage commercial bus operators to non-fossil fuel or far less pollute service.
- Get the proper monitoring station put back at Wren cross urgently its seem awful that KCC have not done this for a year. this Leaves me to believe that particulates monitored

Dear all,

In no particular order the following issues I suggest require some attention:

- 1. Atmospheric emissions from agriculture:** This is a curious omission from the Strategy in light of the fact that agriculture is the most significant source of pollution in Europe. Ammonia and other chemicals from livestock waste and fertiliser combine with other atmospheric pollutants to create harmful particulates. These particulates stick to lung tissue in children and adults, which can cause breathing difficulties, reduced function of major organs, respiratory diseases and even premature death. At roughly 2.5 micrometers across, the particles are invisible to the human eye, but large clouds of pollution are often visible as smog, haze or smoke. Storage and application of paper industry and animal waste and ammonia-based fertilisers can reduce resultant atmospheric pollution levels, with pilots within the UK showing some success in this regard. In the wider context, the intensification of agriculture (including poly-tunnels and pack-houses) has led to increased mechanisation and emissions from tractors, HGVs and other vehicles and the use of old and inefficient buses and mini buses to shuttle workers to and from farms and pack-houses (Hill Farm at Ulcombe and Rumwood Green Farm pack-house, for example). Paper waste is a particular local problem which is more a waste disposal than agricultural matter requiring urgent attention in relation to pollution impacts, this would potentially be a worthwhile local pilot project with Defra, Environment Agency and other partners.
- 2. Enforcement:** There is an omission from the Strategy in relation to enforcement generally, and more specifically against buses and taxis left idling within the town centre, and private and commercial vehicles left idling near schools, colleges, creches, residential car homes, hospitals and other concentrations of potentially vulnerable individuals:
<https://www.theguardian.com/environment/2017/jun/30/fine-motorists-idling-outside-schools-to-cut-air-pollution-say-health-watchdogs>. Enforcement in relation to planning decisions stipulating 'clean fleets' and other Conditioned air quality requirements are also not addressed.
- 3. Planting to tackle atmospheric pollution:** A significant cannon of research indicates that within some locations including inner urban areas the 'air conditioning' role of vegetation is the most effective means of mitigation against atmospheric pollution. Trees and shrubs with downy leaves have been shown to be especially effective in cleansing the air of harmful particulates. Hedgerow planting has also been identified as an efficient means of tackling inner urban pollution because of the very high leaf surface area and 'proximity to the exhaust pipe' <http://www.bbc.co.uk/news/science-environment-39943197>. Glasgow City Council has evidenced some benefits from using 'CityTree' structures incorporating mosses to tackle local air pollution hot spots <https://www.glasgow.gov.uk/index.aspx?articleid=21339>.
- 4. Atmospheric pollution from diffuse pollution sources such as biomass boilers, domestic and commercial heating systems, firework displays, river boats, barbecues and bonfires:** Research indicates that diffuse

pollution sources can be particularly problematic for human health because of their complex chemical toxicity and the presence of significant volumes of micro particulates. Actions to address planning, building regulations, licensing, enforcement and other implications.

5. **Monitoring effort:** Monitoring effort is clearly deficient within Maidstone Borough both urban and rural, and far more widespread and effective monitoring station coverage is urgently required, especially should the AQMA be 'shrunk' as proposed.
6. **Action to ensure MBC fleet and our contractors utilise low emission technology:** A number of UK local authorities such as Dundee, South Lanarkshire, Glasgow, Islington, Fife, Gateshead, Newcastle upon Tyne, Oxford, North Lanarkshire, Nottingham and Cambridge City Councils and Hackley LBC (and their contractors) are converting to electric, LPG or bio-fuel fleets. However, electric vehicles are no panacea for air pollution and reduced vehicle use through planning, parking and permit charging structures and enforcement is the only way to cut air pollution significantly: "Cars must be driven out of cities to tackle the UK's air pollution crisis, not just replaced with electric vehicles, according to the UK government's top adviser" The Guardian (04/08/217).
7. **Improved epidemiology:** More effective partnership working with the NHS, Public Health England and KCC Public Health is required to identify associations between poor air quality and health outcomes. This will ensure the most ergonomic application of effort in relation to local action to tackle air pollution hotspots and monitor the success of such interventions.
8. **Using Planning Conditions to require low emission service vehicles and fleets:** A number of UK local authorities have introduced planning policies enabling tough planning conditions requiring applicants to utilise low emissions service vehicles and fleets. Such best practice should inform MBC policy and practice. For example, the recent Berry Gardens and Waitrose applications would have benefitted from such conditions.

If you wish to discuss this matter further please do not hesitate to contact me.

Yours sincerely,

Tony Harwood