

Introduction

Tunbridge Wells Borough Council undertook a consultation between 14th September 2018 and 28th October 2018.

The survey was carried out online and by mobile device, with the Environmental Health team attending two farmers markets in the borough during the consultation period. Paper copies of the survey and alternative formats were available on request.

The survey was open to all Tunbridge Wells 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 95 responses to the questionnaire (a further six stakeholder groups sent in written responses). These stakeholder responses have been assessed at the end of this report.

The data has not been weighted, however the top two and bottom two age brackets were combined to give the groups 65 years and over and 18 to 34 years. 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. All suggestions identified have been passed to the Environmental Health Team for response in the committee papers.

With a total of 95 responses to the survey, the overall results in this report are accurate to $\pm 8.5\%$ at the 90% confidence level¹. This means that we can be 90% certain that the results are between $\pm 8.5\%$ of the calculated response, so the 'true' response could be 8.5% above or below the figures reported (i.e. a 50% agreement level could, in reality, lie within the range of 41.5% to 58.5%).

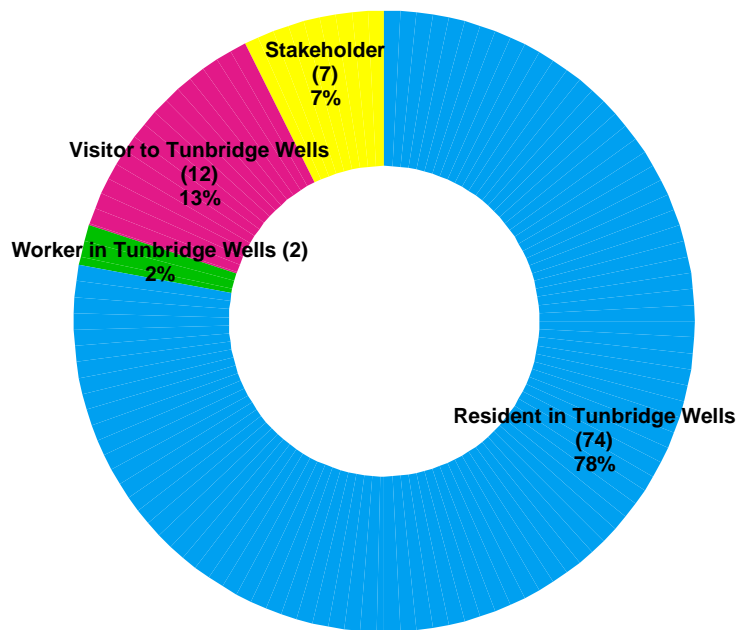
Please note the following:

- Respondents from BME groups are under-represented.
- 18 to 34 years age group is under-represented (13% respondents compared to 22% population).
- 65 years and over age group are over-represented (43% respondents compared to 25% population).

Respondents

¹ Using ONS Mid-year Population Estimates 2017 for residents aged 18 years and over

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The majority of responses are from Tunbridge wells residents. There were seven responses from stakeholder groups to the survey, there are also an additional six stakeholder written responses which are considered later in this report. A full list of stakeholders that responded to the consultation is included at the end of this report.

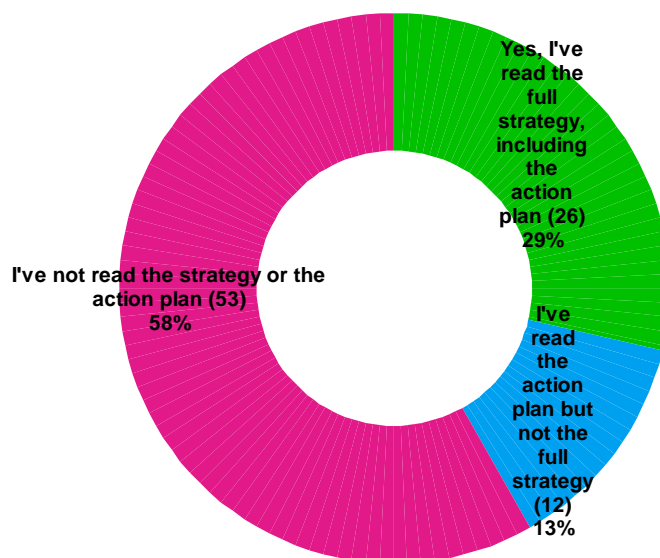
The full survey demographics can be found at the end of the report. In terms of the respondent profile; BME respondents are under-represented: 5.05% of Tunbridge Wells population are from BME

backgrounds however just 1.5% of survey respondents, that are resident in Tunbridge Wells responded to the survey. The census in 2011 reported that 13.5% of residents in the borough have a long term health problem or disability that limits their day to day activities. 10.1% of resident respondents said they have a disability.

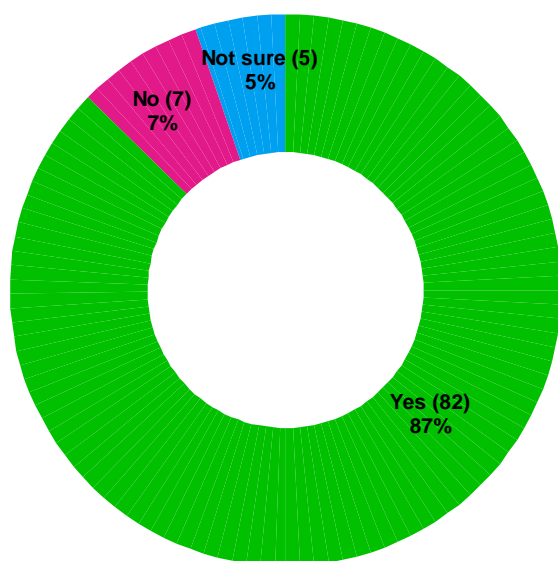
Have you read the proposals?

More than half of all respondents said they had not read the Air Quality Strategy or the Action Plan. A summary of the type of actions in each section and a direct link to the relevant section in the action plan were given as part of the survey. There is no way of identifying how much of this information was accessed or absorbed by respondents.

Overall women were less likely than men to not have read either the strategy or action plan with 65.9% responding this way compared to 54.1% of men.



Transport Actions



Relevance

Respondents were asked “Do you think that the actions related to transport are relevant and appropriate to improving air quality in the borough?”.

Overall, almost nine in ten respondents agreed that the draft actions relating to transport were relevant to improving air quality. Although there were no significant differences in the responses between different demographic groups, respondents aged 45 to 54 years had the greatest proportion responding no at 18.8% and the 55 to 64 year old group had the greatest proportion responding not sure at 18.8%.

Respondents that answered no to the above question were asked ‘considering the Council’s remit, how could the actions relating to transport be improved?’; all seven respondents provided further comment, which can be seen in full below. Three of these suggest that the actions could be improved by being more specific and having clear accountability for who will be delivering them. Another stated the proposals should go further and two make specific suggestions. This group of respondents were all white and none of them stated they had a disability.

Comments: Improving Transport Actions

Most 'action plans' and 'strategies' published by KCC and by TWBC, including those to which you refer such as the 'Active Travel Strategy' and the 'Public Rights of Way Improvement Plan', fail the SMART test. This Air Quality Action Plan 2018 - 2023 is no exception. It is full of proposals to 'review', 'support', 'encourage', 'investigate' and 'explore', but is lacking in measurable actions and has no budget. To be taken seriously a plan must state who is going to do what, by when, how much it will cost and where the funding is to come from. Without all these elements there is no accountability and the plan is not a plan but a recital of desirable outcomes.

Fiddling while Rome burns. Totally pointless while going ahead with new town hall and theatre, wasting money, wrecking Calverley Grounds, chopping down trees and creating extra congestion with unnecessary building works and increased traffic

They don't go far enough. We need a low emission zone.

They are relevant but not appropriate. There is no specific plan to do anything about more active travel options other than to support the creation of another document. It is not specific enough. I do like the other practical steps for buses and more EV ports.

The main cause of pollution is buses and there are too many school buses because local children are not at local schools. The longer term plan should be for local schools to teach local pupils as a rule and non-local children as an exception. This will also encourage walking to school and improve the sense of community involvement as parents will get to know other parents in their neighbourhood unlike schools where parents come from a wide range of communities across a large geographic area that can only be connected with car transport. By implementing a free park and ride at the junction of A21/A26 (preferably with a frequent tram link) at the site of the current boot fair people would

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potentially £5 per day on parking and also have a quicker journey along the A26 to town. This would reduce traffic and emissions (although we would not know whether the electricity used for the system was green)

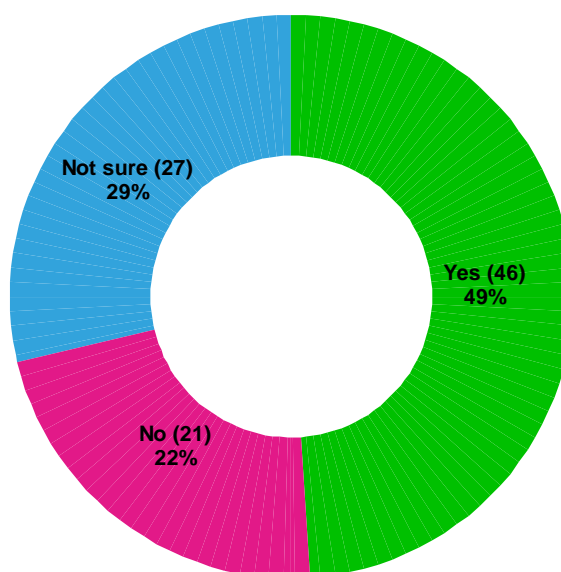
It's a pity there is no space to respond to each action. Most are OK but more cycle lanes are a waste of time & money – existing ones are hardly used. I've even seen local 'professional' cycling clubs ignoring the pedestrian & cycle way alongside the Pembury Road and using the road instead.

Need to be more radical, very broad brush and language doesn't reflect intent?

Impact

Respondents were also asked “Do you think the transport related actions are capable of achieving the desired impact?” there were 94 respondents answered. Just under half of respondents said yes they thought that the actions were capable of achieving the desired impact and just over one in five responded no.

When this question was assessed by respondent type 45.2% of residents (33) said the transport actions were capable of having the desired impact whereas 28.6% of stakeholders (2) that responded to the survey said the same. Male respondent were almost twice as likely to answer no with 29.7% responding this way compared to 15.9% of female respondents.



Stakeholders had a stronger negative response to the impact of actions concerning transport than any other theme with 42.9% responding no.

Respondents that said no, were asked why they don't think the desired impact will be achieved, 16 provided comment. The full comment list is available at the end of this report, below is a summary of these responses.

Three responders made comment about the how the action plan has been compiled these were; that the actions should be prioritised, that there are too many actions and that the wording could be tightened up to make the actions more direct/specific.

There were three negative comments; the action plan is pointless, the plan will not work and that a holistic approach is required and a third that stated there was no political will or funding from KCC for transport in Tunbridge Wells.

There were five comments that contained suggestions; two of these were specific about cycling infrastructure, one suggested that wider intervention to promote public transport and cycling was required; another suggested that the elderly were a potential barrier to achieving the actions and the other mentioned charging facilities for electric cars.

Four respondent's highlighted specific areas of concern; with two mentioned the A26 cycle route with one asking why it no longer appears in the actions and the other highlighting safety concerns

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about having a cycle path along the A26 and querying the volume of traffic that would use it. One person mentioned cycling along London Road and the last commenter mentioned the Spa Valley railway as a cause of poor air quality and pollution.

There are three comments that have been classed as general as the intention was not clear. One of these was a comment about the wording of the survey while the other two are statements about behaviour with one stating that people won't cycle on wet or windy days. The other was that it is difficult to predict how many people will switch to low emission cars and that Tunbridge Wells residents seem to update their cars more frequently than other areas of the UK.

Other Comments

A total of 64 respondents provided further comment about the transport section of the action plan.

Two people made negative comments about the development of Calverley Grounds with one saying the development is ridiculous and the other demanding a stop to the felling of trees on site.

There were three comments mentioning school traffic, of these two said children should go to their nearest school and the other interested in the NO₂ emission data for different times of day and throughout the year to assess the impact of school traffic on emission levels.

Fifteen people mentioned public transport in their comment. There were three that mentioned Park & Ride and one that said it should be easier to pay for buses. The remaining comments in this section said public transport needing to be improved with regular buses, that are cleaner and more routes. There was also comment about TWBC needing to work with public transport providers and aligning strategic routes with destinations.

Eight responders made comment about the road infrastructure; there were four that specifically mentioned the A26 with one saying to take note of the A26/267 study, another stating a bypass for Tunbridge Wells off this road but that it would not be practical, one that there has been an increase in journey time since the withdrawal of the bus lane. Other roads mentioned by commenters in this section included Pembury Road and St Johns, where parking issues were mentioned.

Fifteen respondents mentioned cycling in respect that more should be done for cycling with a better infrastructure that is safe or that the current provision is not suitable and dangerous. One specially mentioned the A26 cycle path being an improvement and another specifically mentioned dangerous cycling putting other road users at risk.

There were six comments around modal shift these mentioned the difficulties in encouraging people to use alternatives to their cars, education and promotion to residents.

Five people mentioned electric cars with three saying there needs to be points for charging. There was one comment about encouraging low emission vehicles and another saying that the production of electric cars is not environmentally friendly. One person commented there was no mention of driverless cars in the action plan.

There were thirteen general comments of which four were positive about the proposed action plan. The remaining comments in this category included a comment about parking charges, dissatisfaction

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with the government over advice on diesel vehicles and consideration for disabled access, with one commenter pointing out that in a mobility scooter they are at the same height as vehicle exhausts. One person mentioned Liptraps Lane being a problem area and another said there is a need to work with car manufactures and other organisations to address the problem.

Seventeen comments were identified as containing a suggestion with several mentioning enforcement for idling vehicles, affordable buses and differential parking controls/fees. There were a couple of people that suggested alternative walking routes away from high traffic should be mapped and publicised. One person suggested signs about turning off engines should be put on the back of buses rather than alongside the road, to avoid distracting drivers and one person suggested the Spa Valley Railway should be stopped from using coal.

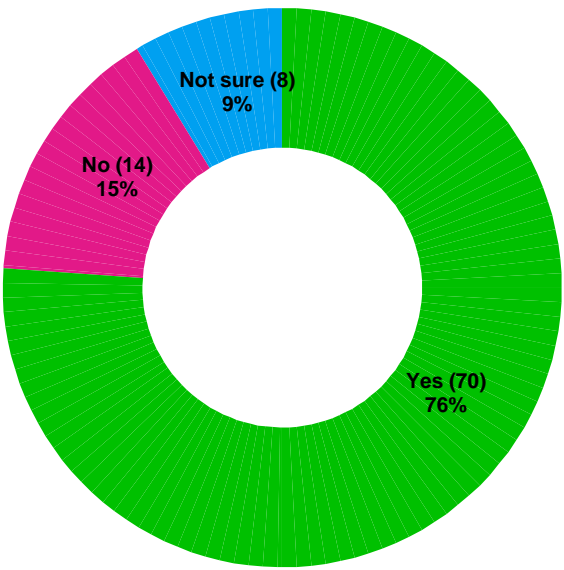
Planning Actions

Relevance

Respondents were asked “Do you think that the actions related to planning are relevant and appropriate to improving air quality in the borough?” a total of 92 respondents answered this question.

Overall, three out of every four respondents said they felt the actions in this section were relevant and appropriate.

Although there are variances in responses from different groups none of these have been assessed as significant. The 45 to 54 years had the greatest proportion across the age groups that responded no at 26.7% and the 55 to 64 year olds group had the greatest proportion responding not sure at 18.2%. Respondents with a disability and those who act as carers has slightly lower proportions responding no than in the overall result at 11.1% and 12.5% respectively.



Respondents that answered no to the above question were asked ‘considering the Council’s remit, how could the actions relating to planning be improved, of the 14 people that responded no, 12 provided additional comment, these are set out in full below.

Four of these made reference to housebuilding in the borough. There is one comment suggesting research into behaviour change and two that implies that the actions do not go far enough saying they are not radical enough and that they are too vague.

Comments: Improving Planning Actions

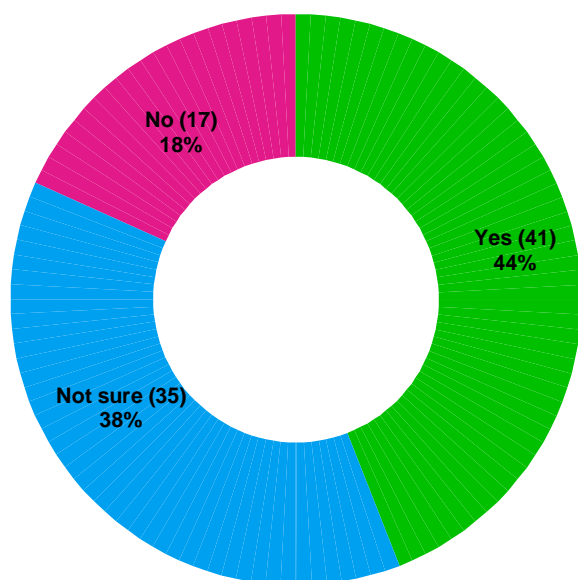
The number of houses being proposed is only going to make the situation worse.
Fiddling while Rome burns. Totally pointless while going ahead with new town hall and theatre, wasting money, wrecking Calverley Grounds, chopping down trees and creating extra congestion with unnecessary building works and increased traffic
The planning activities are too vague and provide no tangible outcome.
You have not considered the pollution damage from the Spa Valley railway only traffic on the roads.
The volume of new house building will generate problems for air quality.
Planning should include research into what would change people's travel behaviour - how infrastructure and engagement can complement each other.
Relevant but concrete plans for more On active travel safety would be appropriate
Encourage TWBC to move to North Farm
See above - more radical action necessary

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The areas between the large new developments on the South East side of town are not suited to cycle paths as many of the roads are either too narrow or have on street parking only or are already full with cars owned by local householders.

It's a pity there is no space to respond to each action. Most are OK but (1) using planning to discourage high emission vehicles is misuse. (2) Reducing parking provision in housing is a mistake

Needs to be rigorous and enforced



Impact

Respondents were also asked "Do you think the planning related actions are capable of achieving the desired impact?" to which 93 respondents answered.

More than a third of respondents said they were not sure and almost a fifth said they do not think that the planning actions were capable of achieving the desired impact. Across the responder groups stakeholders had the greatest proportion responding not sure at 57.1%. Men were also more likely than women to respond not sure with 41.1% answering this way compared to 31.0% of women respondents.

Respondents that said no, were asked why they don't think the desired impact will be achieved, 11 provided comment. The full comment list is available at the end of this report, below is a summary of these responses.

There were three respondents that made comment about the action plan, as with the transport section there was one respondent that said the actions were too vague and another that said the language needs looking at. The last comment here was about ensuring a co-ordinated response.

There was one commenter who said the actions were pointless (this comment has been repeated verbatim throughout the survey). There were also three comments that have been classified as general comments, of these one was positive but queried what other authorities are doing in this area, another said people will still drive due to an inadequate network and the final general comment stated more could be done through car tax systems and commented on the availability of parking for older properties.

There were the comments that have been classified as suggestions, of which, two of these comments related to transport in regard to development mentioning travel infrastructure and the need for cycle and pedestrian paths to be linked up. The final suggestion was about solar panels and carbon neutral developments.

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Other Comments

A total of 47 respondents provided further comment about the planning section of the action plan.

Two people made negative comments about the development of Calverley grounds with one saying the development is ridiculous and the other demanding a stop to the felling of trees on site. One of these comments has been repeated throughout the survey.

Three respondents made comments about electric vehicles with one saying they are currently unaffordable, one saying points for electric buses should be considered and the last one stating that charging points are fundamental.

There were four people who made comments that related to house building infrastructure. One stated there needs to be a minimum amount of green space around new properties; another stated the need for electric vehicle charging points in new builds and one said there is a need to be tough on developers. The last comment here said that planning infrastructure adds to wider provision of cycle paths and bike racks.

There were four comments about transport infrastructure, three of these mentioned cycling infrastructure with the need for a cycling strategy and a suggestion for an off road cycle path from Tonbridge to Tunbridge. The last comment stressed the need for a coordinated approach from developers and traffic going around the town rather than through it.

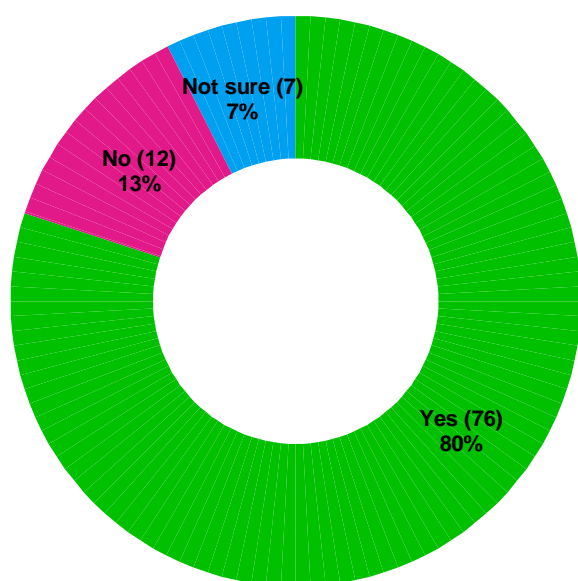
Seven comments have been classed as general. Two of these said improving air quality is important. One commenter expressed doubt that developers would pay much attention to pollution prevention. One made a comment about Kent County Council, another said they don't know enough about it and one said it was important to be accountable. The last comment was about social housing and urged for development not to be built on greenfield land.

There were twelve comments about the action plan four of which were critical suggesting that timescales need to be achievable, that more 'stick' and less 'carrot' is needed and two that implies further work was required on defining the actions. There were two comments that were positive and three that were sceptical that the proposal would have an impact. The remaining three comments were about the need for monitoring, setting specific targets and undertaking analysis of the proposals.

There were nine comments classified as suggestions which included publicising air quality data, criminalising idling, allowing electric cars to use bus lanes at peak times and planting more trees.

There were also two people who mentioned restrictions for wood burners and three that mentioned parking contributing to congestion. There were also two people mentioning new technology with one saying they should be invested in and the other suggesting finding out more about electric bikes.

Public Health Actions



Relevance

Respondents were asked “Do you think that the actions related to public health are relevant and appropriate to improving air quality in the borough?”. A total of 95 people responded to this question.

Overall, four in five respondents agreed that the actions relating to public health are relevant. Out of the respondent type stakeholders had the greatest proportion responding no at 28.6%. In addition men were slightly more likely than women to respond no with 15.8% of male respondents answering this way compared to 9.1% of women.

As with the previous questions when assessing differences in response levels between age groups the 45 to 54 years group have the greatest proportion responding no, with 18.8% of this group answering this way. The data also shows that those aged 65 years and over had a greater proportion responding not sure than in the overall result at 11.4%.

Respondents that answered no to the above question were asked ‘considering the Council’s remit, how could the actions relating to planning be improved?’, of the 12 people that responded no, 8 provided additional comment, these are set out in full below.

There were two comments that have been classified as general comments, one of which has been repeated in every comment section throughout the survey, the second states public health is of critical importance. There was one person that commented that the action plan doesn’t do far enough and that the actions are vague.

The final four comments have been classified as suggestions, of which two focus on cycling which both say should be encouraged with also saying priority for schools should be given to local children. One comment suggests a low emission zone and the last suggestion is around car reliance and suggests fining parents and provide alternative transport options.

Comments: Improving Public Health Actions

Fiddling while Rome burns. Totally pointless while going ahead with new town hall and theatre, wasting money, wrecking Calverley Grounds, chopping down trees and creating extra congestion with unnecessary building works and increased traffic

Does not go far enough. We need to know when the walking and cycling infrastructure plan is going to be published. Supporting schools to use greener transport options is vague and does not say anything.

I genuinely believe that most people are so wedded to their vehicles that they are completely irrational about them. The only way to persuade parents to not drive to school is to fine them heavily and provide sensible public transport provision in place.

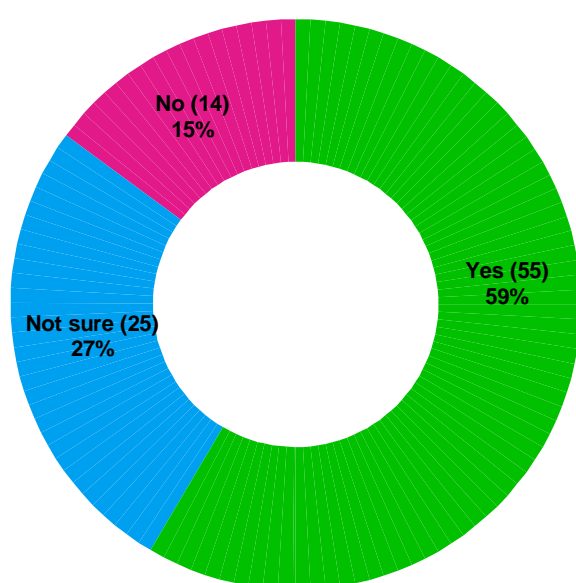
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We need a low emission zone to get rid of diesel vehicles. The owners must pay for polluting us.

As my comment higher up. Public health is of critical importance - we are choking on our own car fumes.

Cycling simply will not work as there is not physically the room for cycle lanes. Those that have been installed are very poorly utilised. Walking to schools should be encouraged but more importantly schools should give priority to local children as the amount of buses bringing children to TW is ridiculous. If they have extracurricular activities then they will need to be picked up by car which adds to congestion

It's a pity there is no space to respond to each action. Most are OK but more encouragement for cycling to school needed.



Impact

Do you think the public health related actions are capable of achieving the desired impact?

Respondents were also asked "Do you think the planning related actions are capable of achieving the desired impact?", to which 94 respondents answered.

Compared to the other action plan themes health had the greatest proportion of respondents agreeing that the actions are capable of achieving the desired impact. This could be due to a greater understanding of how poor air quality impacts on health over knowledge about the relationships between air

quality and planning and air quality and transport.

Men were more likely than women to say that the actions were not capable of achieving the desired impact with 21.1% responding this way compared to 9.3% of women.

Across all the themes public health had the greatest proportion of residents responding positively with 55.4% responding that these actions were capable of achieving the desired impact.

Respondents that said no, were asked why they don't think the desired impact will be achieved, 9 provided comment. The full comment list is available at the end of this report, below is a summary of these responses.

Two comments relate to the action plan with one stating that the actions appear vague and another highlighting that A26 cycle route has been axed and other safety measures dropped from the scheme. There was one suggestion to restrict parking and six comments classified as general, of which one was a repeated comment. Of the remaining five comments that have been classed as general; one stated air quality is not poor and that cycle paths are unaffordable, another said there was too much money was being spent on the new council development and another appeared to be making comment on the consultation as the actions mentioned in this section do not appear to

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relate to the comment which stated that 'no one's health was improved by writing more documents'.

There was one commenter who said the sources of pollution needed to be tackled but these were mostly outside of TWBC's control and lastly one person urged caution in regard to idling measures depending on how long the engine would be off for.

Other Comments

A total of 45 respondents provided further comment about the health section of the action plan. As with previous section the same comment about Calverley Grounds development was submitted, this was the only comment in this section mentioning the development.

There were three people that commented on transport infrastructure of these one just said the action plan would work if we have the infrastructure, one said the current road system is too dangerous for cyclists and the last one said that more cycle lanes are needed and the current ones need to be improved. There was one person that made comment about public transport saying that this should be promoted alongside walking and cycling initiatives.

One responder made comment about the ability of the individual to a greater impact on air quality that individual and suggests there needs to be more 'stick' drawing on the debate about sugar and sugar taxes to illustrate. There were a further six respondents that made comment about the action plan; two of these urge the need for creative, fun and radical campaigns. One was concerned with the funding of such campaigns, one was sceptical that the action plan would have an impact and one was positive. The last comment was a repeat from previous sections which was critical urging the council to take action rather than make plans and strategies.

There were ten respondents that made comment about school traffic. Several of these mention local schools for local children, with one pointing out that Tunbridge Wells schools have a large influx of children from surrounding areas attending. Other comments made suggestion about dealing with school traffic including providing free school uses and encouraging walking and cycling amongst pupils. There was one person who highlighted that the current level of drivers makes walking and cycling to schools unsafe.

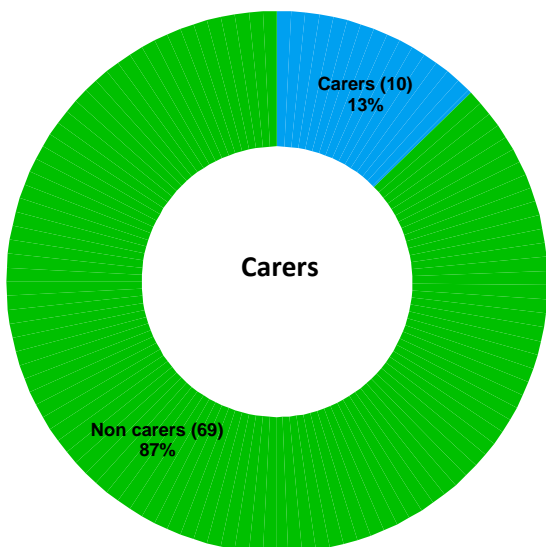
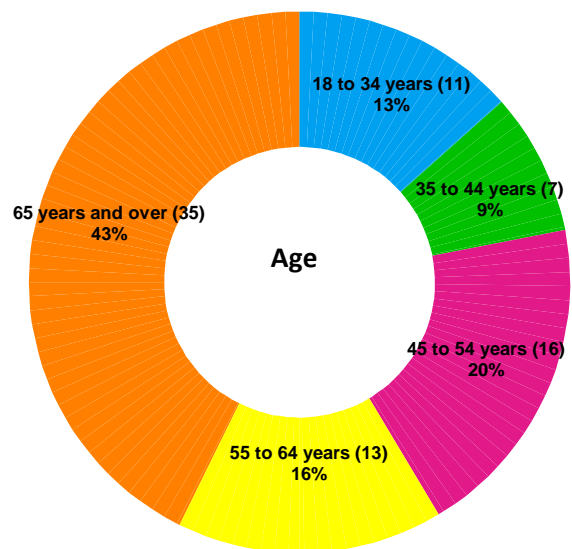
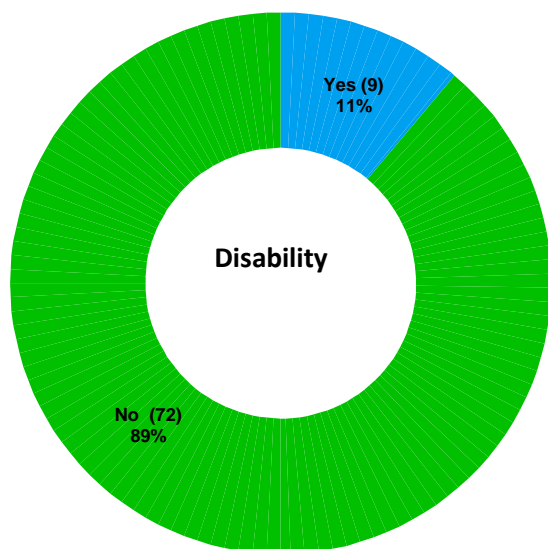
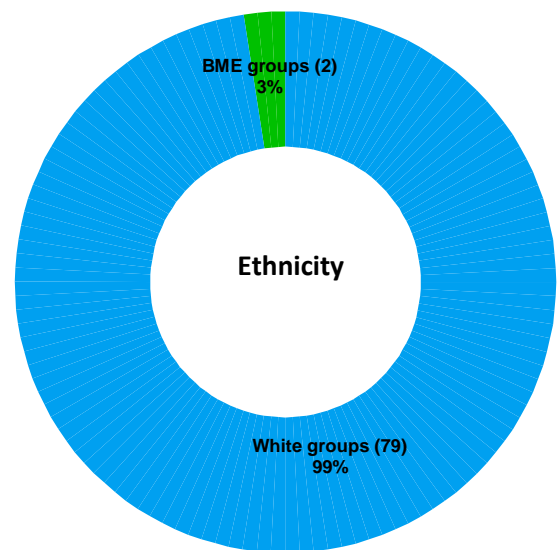
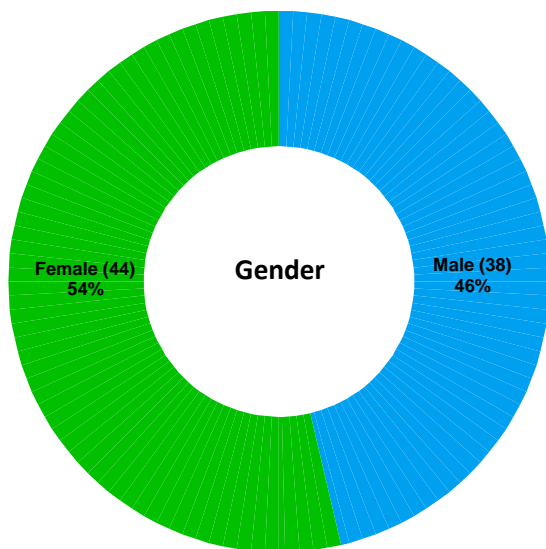
There were twelve comments that have been identified as containing a suggestion of these eight mentioned greater promotion and education of the issues around air quality, these included; promotion in schools and in workplaces, with a suggestion about bike schemes for local employers and several people saying the key is to educate young people. One responder suggested deeper analysis of ill health with air pollution factors on relatable special levels such as by street to provide a clear picture of the issue and another suggested annual surveys to establish if awareness raising action are having an impact.

Nine comments have been classified as general; two of these said it was difficult to get the message out. One person said cycling will become less important with an aging population another made comment that in Oslo, people are not allowed to drive diesel vehicles on cold days (this is not true, in Oslo on days with acute levels of air pollution, regulations come into force which temporarily prohibits the use diesel vehicles on municipal roads in Oslo). One person said the town should be

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walking orientated, one said pollution should be reduced and one said assessment is needed to gain knowledge and lastly there was one respondent that said that air pollution is a society issue and we can do more and should not be complacent – ‘everyone to get involved’.

Survey Demographics



Stakeholders Written Responses

There were six stakeholder organisations (and one Councillor) that chose to respond through a written submission rather than through the survey, these are summarised below and a precis of each response is included at the end of this report.

The Bicycle Users group and the Town Forum both made comment about the funding of the Air Quality Action Plan with the Bicycle User's Group saying it has no budget and the Town Forum saying the plan is underfunded. Both of these groups suggested that the action plan should be more ambitious in what it is trying to achieve and said there was not enough focus on PM_{2.5} emissions.

There were also several stakeholders who made comment about the need for specific targets and measurable actions with the Green Party highlighting the need for the plan to take into consideration new insights and legislation are taken into account.

Stakeholders were positive about plans to publish more data on air quality and proposals to publicise impacts of poor air quality to residents though it was noted that not everyone has access to the internet so additional publication methods should be considered.

Sustainable Development Team was positive about that the proposals include reference to the protection and development of green infrastructure. Several stakeholders were positive about the proposed schools interventions. The Bicycle User Group raised a concern that officers responsible for dealing with cycling infrastructure need to be better trained, others also made comment about cycling infrastructure including barriers between pedestrian and cycling traffic and the need for cyclists to feel safe. While the Town Forum were sceptical that the proposals for reducing pollution from traffic will be delivered to the expected level.

Several stakeholders commented on the political will of Kent Council, as lead authority for transport, to deliver infrastructure changes relating to transport.

Most of the stakeholder responses contain specific suggestions for actions on tackling air quality, many of which related to transport infrastructure. The Bicycle Users Group also sent in an alternative proposal, which mostly related to transport infrastructure (which has been treated as a suggestion) and have been passed to the Environmental health team to comment on.

List of Stakeholder Organisations that Responded to the Consultation

Royal Tunbridge Wells & Area Access Group

Tunbridge Wells Bicycle users Group

Green Party – Royal Tunbridge Wells

Royal Tunbridge Wells Civic Society

Royal Tunbridge Wells Town Forum

Natural England

Royal Tunbridge Wells Together

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Arriva

KCC Public Transport Team

Southborough Town Council

Report prepared by: - Clare Harvey, Data Intelligence Officer, Maidstone Borough Council,