

Appendix: D Draft Air Quality Action Plan Tunbridge Wells Borough Council – Consultation responses, general public: Analysis - December 2018 (Consultation from September to October 2018)

Comment type	Theme*	Response
Lack of political will and funding	General	TWBC is committed to improving and protecting air quality and has a statutory obligation to do so.
Action Plan not specific enough or costed, too vague and projects not funded	General	Many of the actions can be delivered using existing budgets and officer resources. Those that cannot will be subject to specific bids for funding from internal and external sources as these opportunities become available. While not currently funded it will not be possible to bid for funding if they are not part of the action plan.
This is an excellent piece of work	General	Thank you
Too many actions to be realistic, not prioritised, easy will be done hard ones forgotten	Transport, general	We will order the actions according to likely impact in each category. It is likely the less difficult and costly actions will progress faster but this does not make them less valuable.
Action plan should have more specific actions on modal shift, healthy life styles, etc. rather than support existing strategies	Transport, health, planning, general	It is not a good use of resources if several agencies try to implement the same program. (For example, KCC already has an active travel strategy) This can also lead to conflict and dilution of resources. However we will continue to work across organisations and support existing/new schemes and lend weight to their importance; for example such as measures which not only improve health but also air quality.
Action plan does not go far enough/ is not ambitious enough.	Transport, planning, health.	The action plan needs to strike a balance between what can be realistically achieved and what is aspirational. It also needs to be proportionate to the scale of the air quality issue in TWBC.
Too great a reliance of working with others	Transport, planning, health	Protecting and improving air quality cannot be achieved by TWBC (or any other agency) in isolation. This is particularly the case in a tow tier authority. It is therefore essential to work with partners, such as KCC who have highways responsibility.
Enough parking to prevent on street parking	Transport, planning	We will work with parking to see how parking policy can improve air quality. Parking strategies and planning guidance will consider parking provision for new developments.
Cycle Lanes under used, waste of money. People will never stop using their cars.	Transport, Health	Cycle lanes could be used more and better. However this would be best achieved by improving their design, implementation, and link them together. Thereby making it easier

		and safer for people to use. Work is ongoing in this area and we will work with and support the agencies involved.
Advice to walkers and walking maps	Transport, health	We will look at this as part of raising awareness. This could also form part of the website update, along with links to bus and train timetables and info on cycle routes.
Schools admissions policy	Transport	School admissions policy is the responsibility of Kent County Council (KCC).
A26 cycle route has been dropped/ watered down	Transport	This observation has been passed to economic development and KCC.
Needs a more holistic approach	Transport	We work with partners in the public and private sector to provide a joined up and holistic approach.
Cyclists should obey the highway code as much as drivers	Transport	We agree but this would be a police matter
Inappropriate signage	Transport	Any new signage would be with approval of KCC and would be appropriate.
Park and Ride/Tram scheme	Transport	This has been examined and found not be feasible.
Analysis of pollution by time	Transport	We have an air quality analyser on the A26 and data can be viewed on http://www.kentair.org.uk/
Turn off headlights in the day	Transport	Some vehicles cannot have lights turned off as part of safety rules in the country of manufacture.
Reduction of HGV in Town centre, charging points.	Transport	We will look at a low emissions zone which may be chargeable.
Sort out bottle necks	Transport	TWBC does not have direct control of highways issues.
Need good relationship with bus operators	Transport	We have positive relationships with bus operators and meet them regularly as part of the Quality Bus Partnership. We also work with them in connection with funding applications when they arise.
Ageing population not able to walk or cycle, people won't cycle in really bad weather.	Transport	We acknowledge that not everyone can always walk or cycle. However, the aim is to have the opportunity to choose the most appropriate form of transport and this includes walking and cycling and encourage and facilitate those that can for multiple health benefits
Driverless vehicles	Transport	TWBC has no objection to these but will not be the primary agency in their introduction. Also they are unlikely to be available in significant numbers in the short term, and the TWBC has to focus on measures which it can be doing now.
Better design of delivery bays and times of use	Transport	We will look at encouraging 'off peak' or 'night time' deliveries, provided impacts such as noise nuisance are not caused.
Vehicle idling	Transport	We will look at whether adopting anti-idling legislation is appropriate

Taxi policy	Transport	The council is steadily improving the emissions standard of taxis through its licensing policy
Electric vehicle charging points	Transport	We are fully supportive of increasing EV infrastructure and are feeding into the KCC strategic plan on this issue. We are also requiring EV infrastructure to be installed in all new major developments and have relevant planning guidance.
Parking policy	Transport	We will work with parking to see how parking policy can improve air quality
Increased development will make air quality worse	Planning	We are working with strategic planning to ensure that the emerging local plan and supplementary planning documents specifically require the mitigation of the impacts on air quality of any development.
Spa Valley Railway	Planning	Specific issues with Spa Valley can be raised directly with the residents group formed to liaise with the railway directly.
Planning should combine infrastructure with measures to change behaviour	Planning	Mitigation can include travel planning, providing information on public transport and walking/cycle ways. It can also include provision of discounted travel for an agreed time period. We will look to include this in our planning guidance, which will also require cycle storage in new developments
Time scale may not be achievable	Planning	We will review the plan annually to track progress and make sure it is realistic. We are also required to report progress annually to DEFRA
106 funding from developers	Planning	We will cover this in planning guidance and policy
KCC take too long to do anything	Planning	KCC are a vital partner in improving air quality and we work with them on a large number of projects.
Redevelop older housing stock as sustainable social housing	Planning	This is a balance for planning policy to consider but in principle we support a brownfield first approach.
Green space around new developments	Planning	This forms part planning policy and is covered in part by the Green Infrastructure Policy.
Pedestrianise the town centre	Planning	This is ongoing with expansion of the shared space being considered.
TWBC to move to North Farm	Planning	TWBC has already determined its relocation plans.
Misuse of planning to discourage high emission vehicles	Planning	We intend to actively encourage low emissions vehicles.
Planning needs to be enforced	Planning	We will work with planning enforcement to try to ensure effective enforcement
Solar panels and carbon neutral buildings	Planning	These will form part of the Local Development Framework.
Bus routes not good enough and too expensive, have	Planning, transport	TWBC is in regular contact with bus operators and KCC about bus routes as part

cleaner buses		of its Quality Bus Partnership. We also make bids to DERA for funding to assist in making buses cleaner and encourage bus companies to upgrade their fleets. Some elements are beyond TWBC control.
Cycle paths, too dangerous, blocked by cars, roads too narrow not joined to north farm or larger developments	Planning, general	We agree that cycle paths and routes could be better designed and linked together better. This is difficult due to the age and layout of the road system but work is ongoing in this area which we support.
Need to change mind set of people/ raise awareness	Planning, general	We have included actions to raise awareness among target groups and people in general.
What are other boroughs with similar problems doing	Planning, general	Many other boroughs are taking similar measures although TWBC does not have the same level of problem as near neighbours. In the formulation of planning guidance TWBC will be leading locally.
Fine parents for driving to school	Health	This is not legally allowed
Encourage walking to school	Health	We will, and already do, via the 'Clean Air for Schools' project. We have also worked with KCC in developing their Active Travel Strategy
Health not improved by documents	Health	An adopted air quality action plan means that officer time and resources can be justifiably dedicated to the measures which do protect public health.
Turning engines on and off causes more emissions, unreasonable to do.	Health	We do not believe this is the case with more modern vehicles. If you know you'll be stationary for a while it's worth it. Modern vehicles do this automatically.
Wood burners	Health	We will include wood burners in planning guidance but cannot apply this to existing installations.
Walking and cycling to school makes no significant difference, no choice in rural areas.	Health	Walking and cycling not only help protect air quality but also improve physical fitness. We recognise that in rural areas, walking or cycling may not be possible. This is why we are also working with bus companies to improve the emissions standard of their fleets.
Incentives for active travel in leisure centre	Health	We will look at this as part of our awareness raising initiatives
Analyse incidents of ill health and poor air quality at street level.	Health	We currently look at this with KCC public health and the public health observatory.
Raising awareness of public, businesses, school children, parents	Health	We will be working to raise awareness among all stakeholders of air quality as something that is important to everyone and what everyone can do to make a difference.
Why review the air quality monitoring network	Health	We do this to ensure we are monitoring in the most appropriate places, it is good practice.

Need a low emissions zone	Health, transport	We are going to look at the feasibility of this as part of the action plan. Subject to funding being available. However, low emission zones may have unintended consequences by simply relocating problems to somewhere else.
Need to tackle sources outside TWBC control	Health, transport	We acknowledge that there are central government policies that we cannot directly change, however we aim to provide the mechanisms to take advantage of any change in policy, new funding source etc. to improve and protect air quality. Also, the plan is a legal requirement on TWBC to identify measures which are under its control.
Restrict parking/ different parking rates for different vehicles	Health, transport	We will work with colleagues in parking to explore this.
Aircraft pollution	Health, planning	We have no control over flight paths this is a Civil Aviation Authority issue.
Competence of officers	Health, general	TWBC officers are appropriately qualified and competent.

*Theme – comments made under these headings