

Appendix E: Draft Air Quality Action Plan Tunbridge Wells Borough Council – Consultation responses from various interest groups arranged into themes: Analysis - December 2018 (Consultation from September to October 2018)

Comment type	Theme	Response
<p>Disappointed with the document. Whilst being reasonably concise and avoiding jargon or obfuscating language, it does not indicate physical actions that the council will actually take.</p> <p>Express our appreciation for the overall approach; however we believe the plan needs three additional measures to have teeth and make a difference to the health of residents. The period to 1 July 2019 include the determination and setting numerical and time bound targets and the expected improvements from the measures outlined in the plan and then re-issue the Plan with firm commitments.</p> <p>The ‘action plan’ is not an action plan because it fails the SMART test. Any serious plan has a summary stating who is going to do what, by when and how much it is going to cost.</p> <p>Our concerns with the Action Plan are: 1) It lacks ambition in achieving a modal shift to non-polluting transport, particularly active travel. It offers no actions that TWBC will undertake other than ‘review, assess, work with partners, promote, encourage’ etc. 2) The track record on delivering changes in RTW to provide greater safety for pedestrians or to enable active travel suggests that even its modest targets will not be met.</p> <p>We need a town-wide approach to tackling pollution and promoting active travel now rather than the piecemeal and underfunded approach currently on offer. TWBC and KCC need to specify clearly actions to enable people to avoid or at least minimise the amount of pollution they breathe.</p> <p>We would simply reiterate the point that policy is useless unless it is put into practice.</p> <p>We would encourage TWBC and KCC to be bold and forward-looking, using the expertise of local residents and contacts working in planning and public health to help make good decisions about our town.</p> <p>If we do not take brave decisions today, then we can not be surprised if air quality, and general quality of life in Tunbridge Wells, deteriorates further in the future.</p>	General	<p>The Implementation Plan sets out the measures and actions proposed. Some provide more detail and specifics; others are more general about working in partnership or reviewing opportunities for future more detailed actions.</p> <p>The Council cannot deliver the plan in isolation and relies on partners to take action within their area of responsibility.</p> <p>By including the actions we have, it will enable us to explore these in more detail, bid for grant funding and develop them further into more detailed SMART actions.</p> <p>The plan will be reviewed annually and by including these more general actions, it will enable us to assess them in more detail and develop a specific set of actions with timelines and goals.</p> <p>The Action Plan will be an adopted strategy and as such enables air quality requirements to be identified in the Local Development Framework and other critical documents such as the emerging Walking and Cycling Strategy. Equally, it complements strategies as developed by KCC i.e the Kent Environment Strategy.</p> <p>Critically, by including the actions now, it will provide additional leverage when identifying and bidding for grant funding and requiring planning mitigation, including offsetting with s106 funding.</p>
Measures to protect the population of RTW from current pollution risks while reducing future risks do not feature in any existing transport strategy documents.	General	These comments are noted and form part of the consultation response and submission to Cabinet.

<p>This AQ document must impose its direction on them. Increasing active travel will require more than 'encouraging' modal shift - levels of cycling are unchanged from a decade ago and walking levels have actually declined.</p> <p>Publishing pollution data and a pollution map would enable people to make informed choices about their own health risks.</p> <p>Vague strategic ambitions are not enough to drive policy imperatives which should include developing a network of cycling and walking routes, segregated from each other and from motor vehicles.</p>		<p>The adopted Action Plan will be a key strategic document and must be considered when developing other strategy documents.</p> <p>See comments below under health, data is already published on line. However, the aim is to improve the website including links to the site.</p>
<p>The document needs to be much bolder in its targets for a modal shift to non-polluting transport, particularly walking and cycling.</p> <p>Even if the proposed review of the transport strategy were to include adequate proposals, we are unconvinced that as things stand they would actually be delivered to the appropriate standard.</p> <ol style="list-style-type: none"> 1) Political commitment to deliver active travel is missing at the highest levels within KCC or TWBC. 2) Kent Highways uses outdated standards and lacks experience of designing cycling infrastructure. 3) Senior local politicians without the experience of designing cycling infrastructure, and who do not understand its benefits and are not committed to re-enabling people to walk and cycle. 4) Parking. The fact base underlying the strategy is inadequate, with no published detailed data about use of MSCPs and supply / demand for parking. There is an inadequate disincentive for cars to come to the town centre. <p>What needs to happen is:</p> <ol style="list-style-type: none"> (i) For senior politicians at borough, county council and national level to get fully behind a radical rolling back of the culture of car domination. (ii) For officers responsible for designing and building cycle and pedestrian ways to be better trained and made to study and implement the latest international design standards. <p>We must restate that these changes will not require new money. Money being spent on new and wider roads for motor traffic should be re-allocated to enabling of non-polluting sustainable forms of transport – cycling and walking.</p>	Transpo rt	<p>The aim is to work with Kent County Council to support modal shift.</p> <p>The Action Plan cannot deliver these targets in isolation and recognises that responsibility for active travel fall to Economic Development and KCC.</p> <p>The Air Quality Action Plan supports the measures as set out in the KCC Active Travel Strategy and our Councils Transport Strategy and we will work with Economic development as the Waking and Cycling Strategy is developed.</p> <p>Similarly, the plan recognises the opportunities in terms of parking and will work with parking services as the parking strategy is reviewed and updated.</p> <p>These comments are noted and form part of the consultation response and submission to Cabinet.</p>
<p>The following should be considered in greater detail to help underpin the ambitions of this piece;</p> <ol style="list-style-type: none"> A. A strategic view on parking to ensure a sustainable town centre public transport offering. The cost of parking as well as on street parking 	Transpo rt	<p>Parking related comments:</p> <p>These observations have been forwarded to parking services.</p>

<p>restrictions should be included.</p> <p>B. A strategic view on 'on-street' parking to ensure that primary bus routes are protected so that bus services are not delayed by parked cars and vehicle movements as cars seek to move into and out of parking bays.</p> <p>The enforcement and management of unauthorised on street parking</p>		<p>We will work with parking services to identify measures to be included within the parking strategy that will support the aims of the air quality action plan to ensure good local air quality.</p> <p>Good sustainable public transport supports good local air quality, by enabling effective sustainable transport choices to be made.</p>
<p>➤ The increased use of bus priority measures.</p> <p>Buses are frequently delayed when on their journeys by other road users and the withdrawal of the bus lane on the A26 approach to Tunbridge Wells from the north has seen immediate increases in travel times. This impacts other road users as buses are forced to stop in traffic to serve bus stops.</p> <p>This review could include traffic management to help buses as is seen elsewhere in the UK and in Kent. North Kent's FastTrack service sees traffic lights and simple street layout changes to help buses travel and this has driven an increase in public transport use (on this service and overall) and a decrease in congestion as cars are removed from the road for non-essential journeys.</p>	Transport	<p>Bus priority measures including traffic management.</p> <p>These comments have been forwarded to Economic Development and KCC.</p> <p>Good quality public transport, enabling busses to move swiftly to reach their various destinations on route support the aim of the air quality action plan. By enabling sustainable public transport choices to be made as part of the mobility mix.</p> <p>As part of the air quality action plan, work continues to support the move towards low emission busses.</p>
<p>An objective is stated of reducing traffic emissions by 33%. The way to reduce pollution from CO2, NO2, PM10 and PM2.5 is simple: it is to reduce the number of motor vehicles on the road by enabling realistic active travel alternatives for people.</p> <p>Given that 65% of all UK car journeys are under 5 miles, many of which could be undertaken by bike, implementing a comprehensive programme to enable active travel would achieve this on its own.</p>	Transport	<p>Public Health England and Department for Transport recognise that while motorised road transport has a role in supporting the economy, a rebalancing of our travel system is needed.</p> <p>The Action Plan acknowledges that building walking or cycling into daily routines are the most effective ways to increase physical activity. With short car trips a prime area for switching to active travel and to public transport which are pro-business and support economic prosperity. They enable optimal travel to work with less congestion, collisions, pollution, and they support a healthier workforce.</p> <p>https://www.gov.uk/government/publications/active-travel-a-briefing-for-local-authorities</p>
<p>What is required is a network of cycling and walking routes, physically segregated from each other and from motor vehicles.</p> <p>The network will have the following characteristics:</p> <ol style="list-style-type: none"> 1) All dwellings to be within 400 m of a cycle route 2) All roads to be designated as EITHER <ol style="list-style-type: none"> a. Places for people to live, work, shop or play. This will require: <ol style="list-style-type: none"> i. the pedestrianisation of town centres; and ii. filtered permeability for most residential streets to ensure the protection for vulnerable road users from 	Transport	<p>The recommended specific actions as set out by the group are noted and submitted to Cabinet for their observation and attention.</p> <p>These recommendations will also be passed to Planning services, Economic development and KCC.</p>

<p>vehicles using those roads as cut-throughs and to ensure that short trips are quicker and easier by active travel; OR</p> <p>b. For transporting people from place to place, where fully segregated cycling infrastructure will be required.</p> <p>3) 20 mph will be the default speed limit in all residential streets and in town and village centres, with exceptions where necessary.</p> <p>4) For short journeys, particularly up to 3 miles, it will be made easier to walk or cycle than to drive.</p>		
<ul style="list-style-type: none"> ➤ Reduce speed limit through 'Five Ways' to 15 mph. ➤ Prioritise pedestrians, re-route vehicles away from the main town centre(s), ➤ Cut deliveries both corporate and ecommerce within the town. (Specified number of pick up points for parcels resulting from purchasing on-line and banning home deliveries within a specified area of the town.) ➤ Produce a parking and road pricing strategy with no free parking ➤ Lead by example. ➤ Actively consider pedestrianisation of part of the High St.? <p>New cycle routes are mentioned, what about new footpaths?</p>	Transport	<p>These observations will be passed to parking services, Economic development and KCC.</p> <p>The Plan is supportive of a review of the parking strategy to take air quality improvements into account.</p> <p>We will look at encouraging 'of peak' or 'night time' deliveries, provided impacts such as noise nuisance are not caused.</p> <p>We will review options for a low emissions zone, if resources to fund such a study can be identified.</p> <p>A cycling and walking strategy is being developed by the Council.</p>
<p>The most effective way of tackling it is to reduce motor traffic in Tunbridge Wells without reducing people's ability to travel around.</p> <p>The plan will start in 2019 and be fully implemented by December 2028.</p> <p><u>Objectives of the plan</u></p> <p>1) To reduce</p> <ul style="list-style-type: none"> ➤ mean annual average NO2 and PM10 levels from 40 to 27 µg/m3 – well within the safe zone; ➤ congestion-related motor traffic delay hours per annum by 60%; ➤ inactivity-related obesity, Type 2 diabetes and heart murmur by 45% <p>2) To increase</p> <ul style="list-style-type: none"> ➤ town centre business and annual footfall by 25%; ➤ social interaction, happiness and wellbeing of Tunbridge Wells residents (hard to quantify, but we will know it when we see it) <p><u>Budget</u></p> <p>£33m over 10 years (= just £30 p.a. per borough resident) would provide transformational infrastructure for Tunbridge Wells. Using the return on 'active travel' at £13-£19 for every pound invested, (para 3.3 of Kent County Council's Active Travel Strategy), the economic</p>	Transport	<p>These are specific actions as set out by Tunbridge Wells Bicycle Users Group (TWBUG) as an alternative/add on to the current proposed draft Action Plan.</p> <p>These recommendations are noted and form part of the consultation response and submission to Cabinet.</p> <p>These recommendations will also be passed to Planning services, Economic development and KCC.</p>

return will be £½bn. The budget is less than half that for dualling 2 miles of the A21 in 2016.		
<p><u>Congestion:</u> None of the numerous studies on traffic levels, routes and congestion have been implemented. The work is ignored and more studies are then undertaken to confirm the problems, using funding which could be spent on implementing solutions. E.g. The A26/A264 Update Study, which found that key traffic junctions are at or near capacity resulting in crippling congestion at peak times and contributing to damaging levels of pollution at street level to residents.</p> <p><u>HGVs:</u> This same study also identifies that HGVs account for only 3% of traffic entering the town, but 28% do so unnecessarily as through traffic. Given their disproportionate impact on pollution, HGVs must be re-routed to significantly improve air quality in the town centre.</p> <p><u>Traffic management:</u> Traffic entering and leaving RTW must do so with the least impact on both exhaust and particulate pollution. Current congestion delivers a stop-start slow journey with the emphasis on braking; tyre wear and engine idling along all approach roads and rat-running on residential streets.</p> <p>The importance of reducing traffic volumes within the town, combined with smooth, low speed (20mph town-wide) flows with modernised traffic light controls, restricted on-street parking and loading/unloading should become a priority on air quality grounds alone.</p>	Transport	<p>These comments are noted and form part of the consultation response and submission to Cabinet.</p> <p>The Plan includes an action to review opportunities to reduce emissions from delivery vehicles, with the aim: -</p> <ul style="list-style-type: none"> ➤ to reduce congestion at peak time; ➤ support the use of low emission delivery vehicles Inc. electric vehicles; ➤ consolidation of deliveries to reduce number of journeys made;
<p>➤ A strategy around the delivery of goods to high street and office premises and the times that this is permitted.</p> <p>HGVs and multi-drop delivery vehicles are a growing nuisance and directly impacting service quality for all bus companies.</p> <p>Consideration should be given to restricted delivery times such as was delivered by Transport for London during the London Olympic games.</p> <p>This saw less congestion and delivered; as a result, improved air quality as emissions from idling or slow moving vehicles was reduced.</p>	Transport	<p>Delivery vehicles and delivery times:</p> <p>The draft Action plan already contains an action to: 'Review opportunities to reduce emissions from delivery vehicles.'</p> <p>We will look at encouraging 'of peak' or 'night time' deliveries, provided impacts such as noise nuisance are not caused.</p> <p>We will also work with parking services to identify how parking policy can improve air quality and explore options around delivery vehicle parking.</p>
<p>Measures to encourage the take-up of electric vehicles are welcome, since they produce less pollution at source than diesel or petrol ones. But even these produce harmful particulate emissions from brake, tyre and road wear, which is likely to become the major source of air pollution in the future.</p> <p>The answer is to convert to methods of transport that</p>	Transport	<p>Low emission vehicles form part of the suite of measures to support sustainable transport and are not the only solution and in the future may also include such alternatives as the 'hydrogen fuel cell' car.</p> <p>It is recognised that electric vehicles are classed as 'zero tailpipe emissions', which is</p>

<p>are completely free of pollution, namely walking and cycling.</p>		<p>good news in an urban environment with poor air quality. However, particulate emissions from tyre and break wear will remain an issue.</p> <p>Equally, if powered from an energy grid supplied by power stations burning coal or gas it still ends up in the atmosphere, but via the route of a power station's stack as opposed to the exhaust?</p>
<p>We welcome the proposals for the Council to work with bus companies and taxi firms to move the most polluting vehicles out of the AQMA, and encourage a refresh of the bus fleet to introduce less polluting vehicles.</p> <p>Our vision is for all private hire vehicles and diesel buses licensed to operate in urban areas to run on ultra-low emission or zero emission fuels within five years.</p> <p>More can be done to stop the decline in bus use, removing vehicles from the road, such as introducing a Young Person's Discount Card, and reviewing the way buses operate in rural areas.</p> <p>We would support devolution of the bus service to a unitary authority, if Tunbridge Wells / MKIP were to move to this model.</p> <p>Bicycle hire schemes are an interesting idea, but will not work unless people feel safe to cycle in our town.</p> <p>We welcome proposals to look at last mile deliveries, and reducing HGV access to residential areas. But simply providing input into to a KCC policy on 'suggested HGV routes' will not have any real impact on HGV traffic.</p> <p>We would encourage TWBC and KCC to look at more ambitious proposals to protect residents – and our roads – from HGVs.</p> <p>However the bulk of vehicle emissions come from private cars, and the actions in this area are all vague and intangible, and relate to the drafting of policies.</p> <p>The recent failure by Kent County Council (KCC) to deliver basic cycling infrastructure on the A26 that had been well supported in public consultation demonstrates that KCC does not have the political will to deliver on their existing policy commitments.</p> <p>As such, we do not believe the actions related to modal shift will have any impact on air quality in Tunbridge Wells.</p> <p>We have called for the linking of vehicle emissions to</p>	<p>Transport</p>	<p>The observations submitted are noted and form part of the consultation response and submission to Cabinet.</p> <p>Licensing will be reviewing the options for low emission vehicles as part of the licencing policy review and is supported by the Action Plan. However, in terms of time line this is dependant on the review and will include a phased approach to enable drivers to switch to low emission vehicles as they renew their vehicle, recognising cost issues.</p> <p>We will engage with KCC who are responsible for supporting local bus services, which are not provided commercially and these general tend to be in rural areas.</p> <p>These recommendations will also be passed to Planning services, Parking, Economic development and KCC.</p>

<p>residents' parking permit charges as a tangible measure to incentivise greener vehicle use.</p> <p>Another option would be extending the Clean Air Zone to all vehicles, not just buses. Income generated could be invested in cleaner, cheaper public transport, or to support active travel. This would have the added benefit of reducing congestion.</p>		
<p>➤ A review of all council vehicle use (direct and indirect) to look for integration with other services.</p> <p>Could local bus routes be aligned to serve strategic hubs for the council and enable staff and clients to travel to and from offices by public transport?</p>	Transport	<p>The Council does have its own Travel Plan, but this was last updated in 2014.</p> <p>An action to update of the Councils Travel Plan will be added to the Action Plan, to promote behaviour change measures and to encourage the uptake of sustainable public transport.</p>
<p>➤ Arriva fully supports the development of Demand Responsive Transport (DRT) and have experience of operating and developing this new and innovative model of transport.</p>	Transport	<p>Demand Responsive Transport is being developed by KCC in conjunction with their partners.</p> <p>The draft Action Plan contains the following action: 'The Council will support KCC in their delivery of a 'Demand Response Transport service.'</p> <p>We will continue to work with Economic development to support sustainable transport measures, with the aim of improving local air quality.</p>
<p>We would again welcome the intentions of the proposed actions, but question how enforceable they would be in reality. For example, would a planning application on the A26 be rejected due to the impact on an 'Air Quality Protection Area'? We remain doubtful.</p> <p>We welcome the proposals to work with KCC on electric charging points across the Borough, and the commitment to include a requirement for sustainable travel, car clubs and buses to be included within the local plan.</p> <p>Also planning conditions restricting new developments from on-street parking permit spaces are sensible.</p> <p>The local plan should ensure that public, shared and active transport options (rail, bus, bicycle and walking) are key drivers behind the location of new housing developments.</p> <p>There has been a proliferation of new housing developments designed entirely for motor vehicles, with virtually no pavement provision for pedestrians. Vulnerable individuals will often rely on public transport and we should ensure this is provided for in our planning decisions. This will also have the effect of mitigating additional road traffic from new developments, which threaten to further clog our roads</p>	Planning	<p>These observations will be passed to planning services.</p> <p>Each planning application is assessed on its merits and air quality is a material planning consideration. The aim for any development is to ensure future improvements. An air quality supplementary planning application is currently being developed as part of the Local Planning Framework. This is identified in the Action Plan.</p>

and create air pollution.		
<p>A town-wide approach to tackling pollution and promoting active travel is necessary now.</p> <p>1) Installing more AQMA measuring points across the town, not just along the A26 spine. We understand that lightweight mobile equipment is easy to install and operate to identify the most polluted locations for all pollutants.</p> <p>We recommend additional measuring at Carrs Corner/Crescent Road Vale Road from High Street to London Road Halls Hole Road between Cornford Lane and Pembury Road.</p> <p>2) Page 13, section 3 Theme 1 Transport: This Action Plan to complement TWBC's Cycling Strategy and KCC/TWBC Active Travel strategies.</p> <p>Adding references to the remedial qualities of vegetation. The green tree lined approaches to the town must be maintained for air quality, with the loss of green spaces to be avoided and to preserve and increase.</p>	Planning	<p>These comments are noted and form part of the consultation response and submission to Cabinet.</p> <p>We already measure local air quality extensively and review local air quality annually. With the reports and data published on line on the councils website and on http://www.kentair.org.uk/</p> <p>Our reports are also submitted to DEFRA for comment and approval.</p> <p>Monitoring locations and type of monitoring are regularly reviewed in line with national guidance, with the aim of improving the links to publically available information.</p> <p>The Plan supports the protection of existing and development of new green infrastructure as part of the Green Infrastructure Policy.</p>
<p>Measurements: This would include identifying places where measurement should continue, places where measurement should be introduced (eg we would suggest Vale Road) and places where it might as well be dropped.</p>	Planning /Health	<p>We already measure local air quality extensively and review local air quality annually. With the reports and data published on line on the councils website and on http://www.kentair.org.uk/</p> <p>Our reports are also submitted to DEFRA for comment and approval.</p> <p>Monitoring locations and type of monitoring are regularly reviewed in line with national guidance.</p> <p>The draft Plan includes an action to improve the website and link more clearly to the information being provided and this will include advice on measurement and data.</p>
Identifying and addressing 'hot-spots', where there is a high concentration of pollutants coincident with a high presence of the public.		<p>It is important to recognise that we currently are close to the annual air quality objective for nitrogen dioxide and have already identified the A26 as an air quality management area. Thereby, ensuring air quality considerations are taken into account in that area.</p> <p>We also review air quality annually and submit this report to DEFRA for approval.</p> <p>Whilst other areas in and around the town of Tunbridge Wells may be thought of as 'hot-spots', these currently do not exceed the hourly or annual air quality objective levels.</p> <p>All the actions proposed will also support air</p>

		quality improvements in general across the borough.
<ul style="list-style-type: none"> ➤ Give specific indication of the roads to avoid. ➤ Produce and maintain a map of walkways where pollution is minimal or very low. ➤ Is there a way someone can walk from Southborough to Tunbridge Wells avoiding most of St. John's Rd but without going too far out of the way? <p>We think there is a good case for pedestrians and cyclists to be advised to avoid certain “hotspots” at specific times.</p>	Health	<p>It is important to recognise that pollution levels whilst close to the annual air quality objective level for nitrogen dioxide (NO₂), are not as high as in major cities and conurbations. Any advice given would be proportioned to this.</p> <p>As part of working with schools etc. we will advice on air quality in general and that walking away from main roads may help and be more pleasant.</p>
<p>The report focusses on NO₂ and, to an extent on PM₁₀, which is becoming a more important source of pollution, but lacks references to PM_{2.5}.</p>	Health	<p>The air quality objective for nitrogen dioxide NO₂ has been exceeded and not the objective for particulate matter PM₁₀. Hence, as required by part IV of the Environment Act 1995 an air quality management area was declared for NO₂ and the associated Action Plan produced.</p> <p>DEFRA policy guidance 2016 states: ‘That local authorities are expected to work towards reducing emissions and concentrations of PM_{2.5}, but are not required to carry out any additional review and assessment but make use of national data.’</p> <p>We already meet the guideline value for PM_{2.5}. Public Health England 2014 data¹. That said the actions as set out in the proposed plan will also benefit particulate matter.</p>
<p>We welcome the commitment to use the ‘Estimations of costs to the NHS and social care due to the health impacts of air quality tool’ in order to calculate likely future savings as a result of interventions, and to use this as justification to fund preventative schemes.</p> <p>Also we support proposals to make air quality data publicly available online. Given the Council’s desire to target vulnerable groups, it may be worth considering how people who do not have access to email would receive poor air quality alerts.</p> <p>The proposed projects and interventions with schools are to be welcomed. As we have previously stated, safe cycling routes, 20 mph limits and concrete measures to tackle rat running will be necessary before parents will be willing to allow their children to access school via active travel.</p>	Health	<p>These observations are noted.</p> <p>Opportunities to receive text messages are available; however there are cost implications and the need to undertake a cost benefit analysis. These observations are noted and will be taken into account in any future revisions on air quality data management.</p>

¹ <https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution>