

Tunbridge Wells Borough Council Response to KCC Consultation on Local Transport Plan
Public Consultation 27 June to 18 September 2023

Draft Local Transport Plan Page Number	TWBC Comments
7	<p>Figure 1, point 7: TWBC suggests splitting this into separate points regarding a) roadside air quality, and b) carbon reduction.</p> <p>It should be made clear that the policy outcomes are not in priority order, or in an order that would influence if funding is sought.</p>
8	<p>Zero emission vehicles are mentioned for the first time in the Draft LTP. TWBC wants KCC to know that there are no zero emission vehicles, only vehicles with zero tailpipe emissions, and that electric vehicles (EVs) emit as much or more particulate pollution via brake and tyre wear as any other vehicle, and thus are significant contributors to PM2.5 which is likely to be the next big air quality challenge. This is partially clarified later in the document, but it would be beneficial to have this clarity earlier on in the document.</p>
9	<p>If KCC is going to work with District Councils, to produce 'harder and stronger' air quality action plans, this is something to be welcomed. District Councils have been calling for KCC to do this for many years – currently it is very difficult to get any meaningful contribution from KCC Highways to the development of action plans. The County Council's responsibilities with regard to Local Air Quality Management are shown below (taken from DEFRA's Policy Guidance PG22):</p> <p><u>County Councils</u></p> <p>3.10 County councils have obligations under LAQM as set out below and in practice they should proactively engage with the district council as soon as an air quality issue is identified.</p> <p>3.11 County councils were already required under the Environment Act 1995 to collaborate with district councils on air quality. We have strengthened this requirement through the Environment Act 2021 making the wording clearer to avoid ambiguity.</p>

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	<p>3.12 If informed by a district council of its intention to prepare an AQAP, a county council must propose specific measures it will take to help secure the achievement and maintenance of air quality standards and objectives in the relevant district local authority's area, including target dates by which the measures should be carried out. District councils should incorporate county council proposals and dates in their AQAP.</p> <p>3.13 Upper tier authorities have a duty to support district councils to carry out their functions by providing details on planned action at county level that could impact air quality (e.g. transport plans) and proposing actions they could take using powers and levers available to them. The Environment Act 1995 requires upper tier authorities to: - Provide the lower tier authority with proposals for particular measures it will take to contribute to the achievement and maintenance of Air Quality Objectives, including a date by which each measure will be carried out. - Deliver the actions they are responsible for as set out in the AQAPs, to the timescales defined. - Provide assistance to the district council to coordinate action across neighbouring local authorities and with other public bodies.</p> <p>3.14 There is very strong evidence on the significant contribution of transport emissions to air pollution in urban areas and the legislation requires county councils to bring forward measures in relation to addressing the transport impacts for inclusion in any AQAP.</p> <p>3.15 The county council is a consultee to ASRs and AQAPs. Under section 86(2) the county council may make recommendations to the district council in relation to any review and assessment of air quality or development or amendment of AQAPs in the local authority area.</p>
14	Mention is made of KCC's statutory responsibilities with regard to climate change, but the responsibilities with regard to air quality (above) are not mentioned. TWBC considers that additional text should be added to set out KCC's statutory responsibilities in respect of air quality.
19 - 20	Regarding " <i>We will deliver our ambition to reduce fatalities, serious injuries and the severity of collisions, including on the county's rural roads</i> "

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	<p>TWBC suggests that this includes provision to look at the many junctions on the county’s rural roads where visibility is impaired due to untrimmed vegetation and unmaintained verges.</p> <p>Regarding <i>“We will support the development of zero emission / new technology public transport projects, for example zero emission buses, to increase efficiency and sustainability of public transport options”</i></p> <p>TWBC considers that parts of the county have become a dumping ground for ancient polluting buses which other authorities won’t allow to operate in their areas. Zero emission buses are welcome, but a priority should be to get all the 20-year-old Euro III buses off the road as soon as possible.</p> <p>Regarding <i>“We will work with Districts to produce harder and stronger action plans for air quality management areas where required”</i></p> <p>Please see TWBC’s comment above.</p> <p>Furthermore, TWBC considers there is confusion of priorities, for example below on page 19:</p> <p><i>“We will accelerate and prioritise local road improvement schemes to tackle congestion and air pollution”.</i></p> <p><i>“We will incentivise people to choose alternative options to the car by prioritising the maintenance and creation of safe and accessible walking routes and cycle lanes and providing bus priority where appropriate”.</i></p> <p>And on page 20:</p> <p><i>“We will turn the curve on transport emissions and road pollution by developing approaches to road space, parking, public transport, and electric vehicle infrastructure with a presumption towards more sustainable and low carbon travel modes”.</i></p>

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	It does not explain that there are tensions between improving walking and cycling and making highway improvements for cars for example, or between providing parking and encouraging too much car use. It also acknowledges on page 29 that road improvements will encourage more trips.
26 - 30	<p>Section on 'Turning the Curve' – TWBC feels that there is not much ambition to address carbon emissions in the county. There seems to be an acceptance that targets will not be met, and that other parts of the country or economy may make up for this. This should be re-considered/re-framed. It is noted that a number of Borough Councils, including TWBC have a net zero target of 2030, whereas the LTP has a net zero target of 2050. This should be re-considered so as to align with district targets.</p> <p>Page 26 - There is a typo in the 3rd bullet point (7 The planned.....)</p>
32 – 54 generally	The nine policy outcomes read as a list of priorities. It is unlikely that this is what is meant so for clarity and to avoid confusing going forward, it is felt that the presentation/framing of the policy outcomes (and associated policy objectives) should be re-considered.
32	<p>Policy Outcome 7 - as mentioned previously, EVs will mainly improve roadside air quality by reducing NO2. They will still emit significant quantities of PM2.5, for which there are new tighter targets coming in. This is clarified later in the document, but TWBC suggests that this is also mentioned earlier in the document.</p> <p>Policy Outcome 8 - there could be a lot of unmet demand for public transport, and bus operators could consider seeking to optimise the alignment of services with people's working patterns. More generally, if people are offered clean, reliable, and safe public transport which goes to the right places at the right times, then they will use it – TWBC notes that evidence to support this was gathered during the consultation for Kent's Bus Service Improvement Plan. Where service provision is very poor, people make other arrangements, and then 'lack of demand' becomes a reason to cut services even further.</p> <p>Policy Outcome 9 - there is a typo (increasing numbers if people).</p>
35, 38 and 40	TWBC considers that the colour of the main roads on the maps do not show up very well against the background.

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47 - 48	<p>It is felt that this whole section needs some clarification. It is conflating roadside air quality and carbon emissions whereas they are two distinct problems. Roadside air quality is about pollution at ground level which is poisoning us. The effect of CO₂ can occur from high up in the troposphere. It is likely that this section does contain all the relevant information, but re-consideration needs to be given as to how this is presented, so that it is clearer. Page 48 states that almost all vehicles will need to become zero emission but goes on to say that all vehicles produce PM₁₀ and PM_{2.5}. Comments made by TWBC above (see comments on page 8) explain that this is a conflict – vehicles can't produce PM₁₀ and PM_{2.5} and at the same time be zero emission.</p>
53	<p>Reference to the active travel is welcomed, however it is noted that TWBC officers have some concerns about the work that is being undertaken and have recently made some comments to KCC about this. These concerns (mainly about how the KCWIP aligns with LCWIPs prepared by the districts and how routes are prioritised in future funding bids) have been raised with the Team preparing the KCWIP.</p>
<p><u>Additional comments on consultation questionnaire</u></p>	<p>Relating to question 9 of the questionnaire, TWBC has prioritised points 2, 8 and 7 as KCC has asked for the top three priorities. However, point 9 is considered an equal priority for TWBC and wants KCC to be aware of that and for this to inform KCC's response to this consultation. TWBC has therefore selected four top priorities.</p> <p>Question 10, 1A: KCC should clarify what this policy objective would mean – TWBC assumes that this means more money to fix roads and pavements and has responded to this part of the question accordingly, but this should be clarified/expanded upon in the next iteration of the LTP. Furthermore, 'achieve' should be defined – would this mean funding achieved only by cut backs elsewhere such as children's services, perhaps?</p> <p>Question 10, 5B: TWBC opposes this policy objective because it feels that enforcement is best dealt with at a district level as this enables a better understanding, better communication and accountability with</p>

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	<p>residents. In the next iteration of the Local Transport Plan, it would be beneficial for the document to set out clearly whether KCC intends to consider taking enforcement powers away from the Districts.</p>
<p><u>General comments</u></p>	<p>TWBC is concerned that there is an over reliance on EVs as the solution to all environmental problems. TWBC would like to see much more detail on how KCC plan to deal with AQMAs where the roads and congestion are the issue, and a clearer acknowledgement of their statutory responsibilities.</p> <p>As well as the over reliance on EVs, the LTP appears to be encouraging/facilitating the current level of car trips or even a greater number of trips, which does not help with congestion nor emissions from particulate matter.</p> <p>The engagement with the Local Planning Authorities should be seeking to set ambitious Modal Shift targets and acknowledge that these can be met with appropriate infrastructure and County wide funding.</p>
	<p>Despite the words <i>prioritising</i> and <i>presumption towards</i> low carbon modes, there is very little indication in the document of a significant ambition for modal shift to walking and cycling (including e-bikes) – for shorter journeys in urban areas in particular. This is despite the fact that active travel can help deliver a number (if not all) of the other priorities that KCC sets out including:</p> <ul style="list-style-type: none"> • Highway maintenance • Vision zero (road safety) • Carbon reduction • Economic growth – there is evidence that more active travel can help to support town centres • Better air quality • Better public health • Biodiversity – other environmental improvements/conservation by not building new roads/junctions etc.

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	<p>Improving cycling and walking infrastructure is Policy Outcome 9, which gives the impression that this is Kent's lowest/least priority (as it is the last of the nine policy outcomes).</p> <p>However, there is support for Policy Objective 9B, which relates to noise disturbance from new/expanded airports (including Gatwick).</p> <p>There does appear to be more enthusiasm for public transport within the document, but improvements to walking and cycling infrastructure are required in order to get people to bus stops or rail stations and make this a realistic choice for more people. In addition, TWBC considers that the LTP should be lobbying for more government support for bus services which have been hit hard by Covid.</p>
<u>Comment on EqIA</u>	<p>TWBC notes the Aims and Objectives of the EqIA and is supportive of the general ambition of the Draft LTP, which is expected to have a positive impact on protected groups due to the overall aim of delivering safer, more reliable, more accessible, and a wider choice of transport.</p> <p>There is nothing further to comment at this stage, as a thorough review of individual policies has not been undertaken at this stage. It is noted that the EqIA will be subject to a full consultation, along with future iterations of the LTP, and TWBC will comment further at future consultation stages.</p>