

2<sup>nd</sup> July 2019 to 23<sup>rd</sup> September 2019

Kent County Council, on behalf of all councils in Kent and Medway, are seeking your views on the draft Kent and Medway Energy and Low Emissions (ELES) Strategy.

**What information do you need before completing the questionnaire?**

We recommend that you read the draft ELES before filling in this questionnaire. All consultation material, including a detailed evidence base is available on our website [www.kent.gov.uk/energyandlowemissionsconsultation](http://www.kent.gov.uk/energyandlowemissionsconsultation) or hard copy on request.

This questionnaire can be completed on our website. Alternatively, you can print and fill in this paper copy and return it via: ELES Consultation, Sustainable Business and Communities, 1st Floor Invicta House, County Hall, Maidstone, Kent ME14 1XX.

**Please ensure your response reaches us by Monday 23<sup>rd</sup> September 2019.**

**Alternative Formats:** If you need this questionnaire or any of the consultation documents in an alternative format, including hard copy, please email [alternativeformats@kent.gov.uk](mailto:alternativeformats@kent.gov.uk) or call 03000 421553 (text relay service number: 18001 03000 421553). This number goes to an answering machine which is monitored during office hours.

**Privacy:** Kent County Council collects and processes personal information in order to provide a range of public services. Kent County Council respects the privacy of individuals and endeavours to ensure personal information is collected fairly, lawfully, and in compliance with the General Data Protection Regulation.

## Section 1 – About you

### Q1. Are you responding on behalf of...?

Please select the option from the list below that most closely represents how you will be responding to this consultation. *Select one option only*

- Yourself as individual
- Yourself in your professional capacity
- A local authority or council
- On behalf of an educational establishment, such as a school or college
- A health organisation, such as a CCG, Hospital Trust or GP Practice
- A business
- On behalf of a charity, voluntary or community sector organisation (VCS)
- Any other group or in another capacity

**Q1a. If you are responding on behalf of an organisation (business, community group, resident association, council or any other organisation), please tell us the name of the organisation.**

Tunbridge Wells Borough Council

### Q2. Please tell us the first five characters of your postcode:

*Please do not reveal your whole postcode. We use this to help us to analyse our data. It will not be used to identify who you are.*

TN1 1R

### Q3. How did you find out about this consultation?

*Select all that apply*

- Received an email from Kent County Council
- Received an email from another organisation or contact
- From a friend or relative
- Social Media (Facebook or Twitter)

- Event (such as the Kent County Show)
- Poster displayed on a community notice board/KCC building/country park
- Kent.gov.uk website
- Other

Partnership working with Kent local authorities and Kent County Council

## Section 2 – Your response to the Strategy

**Q4. Was the Kent and Medway Energy and Low Emission Strategy (ELES) easy to understand?**

*Select **one** option*

- Yes
- No
- Don't know

**Q4a. Please add any comments in the box below.**

Set out in a logical manner, with an initial introduction, scene setting and what the issues/challenges are.

Followed by the aims, which really are more steps to delivering the Vision, with the themes separated into the evidence base and delivery.

This is a high level document and draws on issues identified in various other County and local authority strategy documents making the link without duplication.

Key focus is the recognition of the priorities that need to be addressed in partnership to achieve the aims and objectives of the Energy and Low Emission strategy (ELES).

The evidence base is vital to develop the relevant priorities and support effective decision making.

It is recognised that an implementation plan with more specific actions will be developed in partnership and integrated into the Kent Environment Strategy Implementation Plan. Reporting will be via Kent Leaders and Chief Executives and appropriate partnerships.

The Council recommends that specific, measurable and time based targets are set utilising a 'RAG' approach to ensure clarity and enable progress to be clearly set

out and identify where further action is needed.

The draft ELES sets out the following Vision:

***By 2050 the county of Kent has reduced emissions to Net-Zero, and is benefiting from a competitive, innovative and resilient low carbon economy, where no deaths are associated with poor air quality.***

**Q5. To what extent do you agree or disagree with this vision for Kent and Medway?**

Select **one** option only

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

**Q5a. Please add any comments in the box below.**

The ELES will be key to delivering on the climate emergency declarations that have been made by councils in Kent and Medway.

We recognise the challenges of meeting net zero carbon emissions, nevertheless Tunbridge Wells Borough Council recommends that a more ambitious target is set for Kent and Medway through the ELES in line with its own recent [Full Council Motion](#) to work with the wider community including businesses, organisations and individuals to encourage them to make their own contributions to meeting a goal to make the Borough carbon neutral by 2030.

The TWBC also agreed to an ambition to make the Council's operations carbon neutral by 2030.

**Q6. To what extent do you agree or disagree that the ELES will help KCC and its partners achieve this vision?**

Select **one** option only

- Strongly agree

- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

**Q6a. Please add any comments in the box below.**

By reporting to Kent Leaders and joint Chief Executives and agreeing a yearly implementation plan, the ELES can be the key strategy to enable the transition to a low carbon economy with clean growth and support action being taken by local authorities to deliver clean air.

This can only be achieved if the ELES is taken into account at all levels of decision making. Strong political support will be essential as some difficult decisions may need to be taken.

Key decisions made at both county and local level should demonstrate how they meet the objectives of the ELES.

To achieve the vision of 'net zero carbon emissions' the Council recommends that actions taken are more specific, rather than use terminology such as 'support' and 'promote' and 'general principals'.

Instead set targets around delivering greater/improved infrastructure to enable people to cycle and walk more and enable safer walking routes to school and a focus on cycle routes. Greater provision for walking and cycling will need to be made to reduce vehicle use.

The Council also recommends: -

- Greater support is provided to enable a more rapid transition to cleaner busses and low emission vehicles
- The impacts, both positive and negative, of emerging technology such as smart vehicles on Kent and local areas is fully understood
- The impact of intensive farming, protecting and improving biodiversity, tree planting and protection and arboriculture is identified and effective action is taken
- Kent and its partners to engage in greater lobbying of Government on the matters of aviation and maritime pollution

**Q7. To what extent do you agree or disagree that the challenges identified in the ELES are the most significant challenges in relation to energy and emissions in Kent and Medway? (pages 10-12 of the strategy)**

Select **one** option only for **each** row/challenge

<b>Challenge</b>	<b>Strongly agree</b>	<b>Tend to agree</b>	<b>Neither agree nor disagree</b>	<b>Tend to disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>
<b>Embracing clean growth</b> (page 10)	X					
<b>Tackling hotspots of poor air quality</b> (page 10)		X				
<b>Protecting the vulnerable</b> (page 10)	X					
<b>Achieving a step change in the reduction of carbon emissions</b> (page 11)	X					
<b>Enabling integrated and connected mobility</b> (page 11)	X					
<b>Ensuring a sustainable, secure and affordable energy supply</b> (page 12)	X					
<b>Overcoming energy grid constraints</b> (page 12)			X			

**Q7a. Please add any comments in the box below.**

Transition to low carbon economy and to meet net zero carbon requires action at all level, including lobbying central government to support this transition at the fastest rate possible. This is especially critical given the 2018 IPPC report setting out the impacts of global warming. The 7 challenges as set out identify the issues facing County.

Critically, it will be essential to identify priority measures such as ensuring energy efficiency is progressed to keep wastage to a minimum, as well as focusing on low carbon energy.

It is important to recognise technology alone will not achieve the end goal, but a

suite of measures will be needed. For example a move to connected, automated and zero emission mobility has the potential, if poorly managed, to worsen congestion and public health. It will be essential to ensure it is well managed to help tackle congestion and air pollution.

It is also recognised that many measures have multiply benefits. For example active travel/sustainable travel cuts carbon emissions, improve air quality and also reverses the trend towards sedentary lifestyles and tackles health inequalities.

It is positive to note that grid constraint is being considered.

Specific comments:

Page 10 Clean growth is inherent to sustainable growth and therefore the following sentence contradicts itself. 'Principles of Clean Growth must be mainstreamed into planning and development, ~~whilst not becoming a barrier to sustainable growth.~~

Page 11 Concern is expressed at this following sentence. 'With severe congestion on the highway network, particularly in major town centres, growth across the county will be constrained without investment and increased capacity.' Replace reference to 'increase capacity' and instead recognise that increasing vehicle capacity does not resolve the issue of a reduction in energy usage, congestion, clean air or physical health, with many town centres already at capacity. Instead this should reference the need for modal shift away from car use, particularly for short journeys.

Page 11 Similarly, the following sentence should instead focus on: 'providing better infrastructure provisions for walking and cycling', instead of ('maximise integration of alternative forms of transport such as walking and cycling; ...')

**Q8. Do you have any alternative ideas or areas you think the strategy should cover that it does not currently?**

**Please add any comments in the box below.**

It is recognised this strategy is informed by, but does not duplicate, other strategies related to energy and the environment.

However, reference to biodiversity should be incorporated within this strategy. Not necessarily as a separate challenge but more detailed reference under air quality, with links to relevant biodiversity strategies, including the protection of ancient woodlands, priority habitats, green spaces, designated sites and enabling the creation of new habitats/green spaces.

Equally, biodiversity plays a key role in the resilience to climate change.

**The Energy and Low Emissions draft strategy takes an evidence-based approach to sustainable economic growth across Kent and Medway. It identifies high level priorities for action in the short, medium and long term. All actions are partnership-based and will be integrated into the Kent Environment Strategy Implementation Plan. Page 16 and onwards outlines the priorities and high-level activities set out under each theme.**

**Q9. To what extent do you agree or disagree with the priorities and high-level activities in Theme 1: Building the foundations for delivery (page 17-18)?**

*Select **one** option only*

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

**Q9a. Please add any comments in the box below.**

Good quality evidence base is vital to inform future policy and strategies and to enable limited resources to be directed to achieve effective results.

2.1 (page 18) this should reference energy reduction in new builds as this is still an area that has not yet been fully addressed.

**Q10. To what extent do you agree or disagree with the priorities and high-level activities in Theme 2: Making the best use of resources, avoiding or minimising negative impacts (page 21-22)?**

*Select **one** option only*

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know



**Q10a. Please add any comments in the box below.**

5.1 Query do the climate emergency declarations supersede the BEIS emissions pledge?

5.2 This action requires stronger wording; replace 'can' with 'will' take action.

5.3 Instead of 'develop' use 'publish' tailored Kent and Medway ....

6.1 This activity is not clear enough, what does 'traffic free routes entail'. For example; urban/inter urban routes or segregated routes on the existing highways? This activity gives the impression that the intention is to get bikes out of the way of cars.

Evidence indicates 'use of' cycle ways increases when these are direct routes to destination.

6.2 Promote is not strong enough. It requires infrastructure and not facilities. Is this a 'campaign action' or infrastructure requirement?

6.3 Could this priority be clarified? One option refer to; 'high speed broadband to enable greater remote working'.

6.4 This isn't strong enough, what does support mean. To shift to low emission vehicles requires fiscal incentives or penalties. More fundamentally it requires improved sustainable public transport to enable modal shift.

6.5 Support the development of a county wide policy specifically relating to on-street charging.

Additional action suggested; All new developments to prioritise walking, cycling and public transport, including linking to the surrounding area and destinations.

**Q11. To what extent do you agree or disagree with the priorities and high-level activities in Theme 3: Towards a sustainable future (page 25-26)?**

*Select **one** option only*

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

**Q11a. Please add any comments in the box below.**

Include an action that requires; All infrastructure developments to set out how low carbon/low emission has been incorporated within the development/ project and clearly set out its decision making.

7.2 Reference to electric vehicles not required.

7.4 Add an example such as mechanical ventilation and heat recovery for new builds in well insulated buildings.

7.6 Instead of 'supporting renewable energy projects on former landfill sites'.  
'Support the development of renewable energy projects, for example on former landfill sites and potential solar car parks.'

**Q12. To what extent do you agree or disagree with the proposed indicators to measure success? (page 30)**

*Select **one** option only.*

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know

**Q12a. Please add any comments in the box below, including any alternative indicators you would like to suggest for measuring success.**

Emissions:

The number of authorities signed up to the 'Emissions Reduction Pledge' has this been superseded by the climate emergency declaration? Instead of signed up should read: Number of authorities reporting and delivering on there pledges, with targets on how actions are being incentivised.

Equally, reporting should include whether emission reduction targets are being met are on track or significantly below target expectations.

Air quality:

Focus should be on particulate matter, nitrogen dioxide and ozone as measured by local authorities.

Number of days of moderate or high/very high air pollution episodes as set out in the DAQI.

Transport:

Recommendation that the following additional indicators be included: -

Set targets for modal shift and monitor (using RAG) if these are being met; i.e.

% modal shift to sustainable public transport (bus travel)

% modal shift to cycling and walking

Km or similar measure of cycle lanes improved/added to in Kent and Medway

Number of car share and car clubs in operation

Targets for modal shift should be set with the indicators being able to highlight whether these targets are being achieved.

Critical, to measuring success will be the supporting action plan as integrated into the Kent Environment Strategy.

**Q13. We have completed initial Equality Impact Assessment (EqIA) on the draft Kent and Medway Energy and Low Emissions Strategy.**

An EqIA is a tool to assess the impact any service change, policy or strategy would have on age, sex, gender identity, disability, race, religion or belief, sexual orientation, pregnancy or maternity, marriage and civil partnership and Carer's responsibilities. The EqIA is available online at [www.kent.gov.uk/energyandlowemissionsconsultation](http://www.kent.gov.uk/energyandlowemissionsconsultation) or on request.

**If you have any comments about equalities and / or the Equality Impact Assessment, please provide them here:**

No observations

**Q14. Finally, do you have any other comments to make about the draft Energy and Low Emission Strategy?**

The ELES should make reference to the climate emergency declarations made by County, Medway unitary and some Kent local authorities.

Equally, in the policy drivers (page 7) and page 14 of the 'Evidence base' it is critical reference is made to the 'The Climate Change Act 2008 (2050 Target Amendment) Order 2019. Similarly, the 2018 IPPC and the 2019 Committee on Climate Change report should be referenced.

The Evidence base can provide some further details on the extensive evidence provided on the impact of global warming of 1.5°.

Observations on the evidence base:

Page 4 wording alteration: 'To do this, new homes, buildings and associated infrastructure need to be built to sustainable design standards. A sustainable approach to development will bring benefits including healthier living and working environments; improved efficiency and productivity in use; an increase in active travel, including sustainable public transport, the reduction of fuel costs and the costs of vehicle ownership.'

End-

