# Tunbridge Wells Borough Council

# Local Air Quality Management – Air Quality Action Plan

November 2009

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## EXECUTIVE SUMMARY

This Air Quality Action Plan developed in March 2008 and adopted by Cabinet March 2010 is the culmination of the second round of local air quality review and assessment for Tunbridge Wells Borough Council (TWBC). The process of Local Air Quality Management (LAQM) review and assessment has been set down in Part IV of the Environment Act 1995, which forms part of the Government's response to European Directives on Air Quality to which the UK Air Quality Strategy responds.

Between 1998 and 2000, Tunbridge Wells Borough Council undertook its first round of review and assessment of air quality. The first round assessments (Stages 1, 2 and 3) concluded that it was not necessary to declare any Air Quality Management Areas (AQMA) for any pollutant.

The first phase of the second round of review and assessment, the USA, was completed in May 2003 and this provided an update with respect to air quality issues within Tunbridge Wells Borough Council on the conclusions of the previous round. The USA concluded that a Detailed Assessment was required for annual mean $NO_2$ along the A26 London Road at Mount Ephraim and Southborough due to road traffic emissions. The Detailed Assessment concluded that there was a risk of exceedences of the annual mean $NO_2$ objective and an AQMA was declared by the Council in November 2005.

The third round of air quality review and assessment commenced in 2006 with the USA. The USA report concluded that all Air Quality Objectives were predicted to be met outside the AQMA and no Detailed Assessment was required.

The A26 through Tunbridge Wells town centre is heavily congested in the morning and evening peak periods. The A26 through Southborough suffers congestion throughout the day, being the main link between Tonbridge, the A21 and Tunbridge Wells. The A26 is an important strategic link in the Kent road hierarchy, and will remain so for the foreseeable future. Achieving the necessary reductions in traffic on this route to achieve the $NO_2$ annual mean objective/EU Limit value by 2010 is therefore considered challenging. The Further Assessment indicates that in 2010, without local intervention, exceedences are still likely to occur along the A26.

In compiling this Action Plan, Government guidance LAQM.PG (03) and guidance from the National Society for Clean Air has been referred to, alongside guidance provided by the Department for Environment, Food and Rural Affairs through its Air Quality Action Plan Help Desk.

The aim of this Action Plan is to identify how TWBC will use its existing powers and work together with other organisations in pursuit of the annual mean Air Quality Objective for nitrogen dioxide. Measures are proposed to improve air quality both within the AQMA and throughout the Borough as a whole.

Kent County Council (KCC) is responsible for the traffic management of the A26 and as such has an important role in the consideration of direct actions proposed for the AQMA in order to reduce road traffic emissions. TWBC will work together with the relevant transport authority, KCC, and other relevant stakeholders to improve air quality within the AQMA and throughout the Borough.

The measures proposed in the Action Plan include both direct measures within the air quality management area that are; -

- Already being undertaken.
- Measures proposed as part of Kent County Council Local Transport Plan, LTP2.
- Those that require further work and research as to their feasibility and cost benefit in terms of improving air quality in the AQMA allowing for future more specific target setting.

And general indirect measures to improve air quality throughout the Borough.

Direct measures being undertaken:

- DEFRA air quality grant funding for action planning has been used to support the development of VISUM a transport model being produced by Jacobs on behalf of Tunbridge Wells and KCC. The model will be able to be used to inform the Action Plan and target measures more effectively and enable prioritisation of actions. The VISUM project is due to be completed in August 2010.

- TWBC will continue to support the Quality Bus Partnership for Royal Tunbridge Wells and Southborough and will also consider the opportunities the QBP affords to improving vehicle emissions.

- TWBC are enforcing local parking restrictions in Southborough and Tunbridge Wells (Mount Ephraim Road).

Measures proposed as part of LTP2 and existing Borough Transport Strategy:

- TWBC will work in partnership with Kent County Council and Tonbridge & Malling Borough Council to implement any proposed traffic management improvements along the A26.

- TWBC will continue to work in partnership with Kent County Council to implement A26 (north) Bus Priority Measures.

- TWBC will continue to support and work with Kent County Council to increase uptake and implementation of School and Workplace Travel Plans; particularly where likely to impact on the A26 AQMA.

- TWBC will work in partnership with Kent County Council to review and if appropriate support improvements to Tunbridge Wells and Southborough Local Cycle Network. A cycling strategy is being proposed as part of the Tunbridge Wells Transport Strategy.

Further work and research:

- During the preparation of the Local Development Framework, TWBC will give further consideration to how to manage and address problems of poor air quality. This could include consideration of seeking financial further contributions as appropriate for developments which, due to increased traffic or general activity, will impact on areas of poor air quality as identified through an air quality assessment.

- TWBC will investigate the feasibility of developing and implementing a Borough Council Travel Plan.

- TWBC is working with KCC to review and develop a new Tunbridge Wells Transport Strategy. Amongst its key objectives the Strategy will also recognise air quality as one of its aims and objectives. Joint working initiatives and reviews will be established to enable action planning to be progressed to develop more specific targeted and cost benefit assessed actions for air quality.

- TWBC will continue to work in partnership with Kent County Council to undertake an initial study, which will assist in establishing a strategy for determining the suitability of an enhanced public transport system for Royal Tunbridge Wells and Tonbridge at a strategic level. The aim of the Action Plan is to support an effective integrated transport strategy which forms part of the Transport Strategy review.

- TWBC as part of the Transport Strategy review will investigate possible partnership work with Kent County Council to assess the feasibility to review freight policies and possible identify a series of specific measures aimed at reducing HDV emissions.

General measures to improve air quality across the whole Borough include:

- TWBC will continue to work with KCC and other partners to deliver improvements in emissions standards, where practicable.

- TWBC will continue to work with partners to actively support and promote the Kent-wide car share scheme, to encourage greater uptake.

- TWBC will explore the potential for operation of a Car Club in Tunbridge Wells.

- All relevant TWBC Departments, including Environmental Health, Planning Policy and Development Control, will continue working closely together to ensure that air quality is taken into account in the planning process when considering future land uses, particularly with sites in or close to AQMAs or in areas marginally below air quality objectives. The specific commitment of each service needs to be developed and progressed.

- TWBC will continue to work together with developers, KCC and other partners to improve sustainable transport links serving new developments and secure travel plan agreements, where required by planning policy.

- TWBC will continue to develop, through the Kent & Medway Air Quality Partnership, a general planning guidance document to assist with air quality assessments of development proposals.

- TWBC will continue to actively participate in the Low Emissions Strategy Peer Review Group to develop local measures and a Low Emissions Strategy that will support improvements to local air quality.

- TWBC will continue the commitment to undertake local air quality monitoring within the Borough to ensure a high standard of data is achieved to assess against air quality objectives.

- TWBC will make details of the Action Plan measures and annual progress reports available on its Website to ensure accessibility to the consultation and implementation process.

- TWBC will actively work towards providing information for the Community of Tunbridge Wells Borough, to assist in choosing and using alternative sustainable modes of transport and understanding the impact of pollution and air quality.

- TWBC will continue to support and be a Member of the Kent and Medway Air Quality Partnership and Monitoring Network Group. Tunbridge Wells will also work together with the Kent & Medway Air Quality Partnership on air quality studies within the County to raise the profile of air quality in Tunbridge Wells and County-wide.

- TWBC will continue to proactively enforce industrial control and nuisance legislation to minimise pollutant emissions from these sources in Tunbridge Well.

- TWBC will continue to work together with the Kent Energy Centre and other partners to promote and implement energy efficiency measures in Tunbridge Wells

- TWBC will review the Action Plan in consultation with all relevant parties to update the plan and include the changes in local air quality management and in light of the review and assessment results for air quality. The plan shall be reviewed by quarter 4, 2010/11.

The measures proposed in the main, are activities that have been included within Kent County Councils Local Transport Plan, or are actions already in progress such as minimising pollutant emissions and partnership working amongst Kent local authorities, Medway and KCC on air quality in general. Other measures are proposed as a mechanism to improve local air quality. Similarly, some measures and changes to wording are as a result of the consultation and the need to develop more specific effective targets to improve local air quality.

The proposed actions will help work towards meeting the $NO_2$ annual mean objective/ EU Limit Value. It has not been possible to assess the air quality impacts of all the main measures to improve air quality within this Plan, through detailed modelling, as these require further investigation and feasibility studies. It is therefore not possible at this stage to confirm whether the implementation of the measures proposed in the Action Plan will achieve the air quality objective and EU Limit to be met by 2010. The impacts of direct measures proposed will be considered further as information becomes available and reported through future progress reports.

# 1 INTRODUCTION AND AIMS OF THE ACTION PLAN

## 1.1 Project Background

TWBC has drawn up, with the assistance of Bureau Veritas, a Local Air Quality Management Action Plan for the A26 AQMA within the borough of Tunbridge Wells, identified through the second round of review and assessment of air quality. The Action Plan is required to be undertaken as part of the local authority's statutory duties as defined within Part IV of the Environment Act, 1995.

Bureau Veritas has undertaken previous review and assessment reports for TWBC, which includes the Further Assessment (2007).

## 1.2 Legislative Background

The latest Air Quality Strategy (AQS)[1] released in July 2007 provides the over-arching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The objectives for ten pollutants (benzene, 1,3-butadiene, carbon monoxide, lead, nitrogen dioxide, sulphur dioxide particulates - $PM_{10}$ and $PM_{2.5}$- and ozone) have been prescribed within the Air Quality Strategy based on The Air Quality Standards (England) Regulations 2007[2]. The Objectives set out in the AQS for the protection of human health are presented in Table 1 below.

The Air Quality Standards (England) Regulations 2007[2] came into force on 15th February 2007. This brings together in one statutory instrument the Governments requirements to fulfil separate EU Daughter Directives through a single consolidated statutory instrument which is fully aligned with proposed new EU Air Quality Directive (CAFE – Clean Air For Europe)[3].

The Environment Act 1995 gives local authorities duties and responsibilities that are designed to secure improvements in air quality, particularly at the local level. Part IV of the Act requires each local authority within the UK to periodically review and assess air quality in its area, and determine whether the prescribed objectives are likely to be achieved by the relevant future year. Where it appears that the air quality objectives will not be met by the designated target dates local authorities must declare an Air Quality Management Area (AQMA) and develop action plans in pursuit of the air quality objectives. Following the declaration in Tunbridge Wells, TWBC is required to develop an Action Plan for the A26 AQMA within 12 – 18 months.

Policy Guidance LAQM.PG(03) was published by the Government in 2003, which included guidance on the development of action plans. The NSCA have published guidance 'Air Quality Action Plans (2000)' and 'Air Quality: Planning for Action (2001)'. These guidance documents have been taken into account in development of this Action Plan for TWBC, alongside guidance provided by the Department for Environment, Food and Rural Affairs through its Air Quality Action Plan Help Desk, which provides examples of best practice and an Action Plan appraisal checklist.

[1] The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007), Published by Defra in partnership with the Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland
[2] The Air Quality Standards Regulations 2007, Statutory Instrument No 64, The Stationary Office Limited
[3] http://ec.europa.eu/environment/air/cafe/index.htm

**Table 1: UK Air Quality Standards and Objectives**

| Pollutant | Objective | Concentration measured as | Date to be achieved by and maintained thereafter |
|---|---|---|---|
| Benzene | 16.25 μg/m$^3$ | running annual mean | 31st December 2003 |
| | 5 μg/m$^3$ | running annual mean | 31st December 2010 |
| 1,3-Butadiene | 2.25 μg/m$^3$ | running annual mean | 31st December 2003 |
| Carbon monoxide | 10 mg/m$^3$ | maximum daily running 8 hour mean | 31st December 2003 |
| Lead | 0.5 μg/m$^3$ | annual mean | 31st December 2004 |
| | 0.25 μg/m$^3$ | annual mean | 31st December 2008 |
| Nitrogen dioxide | 200 μg/m$^3$, not to be exceeded more than 18 times a year | hourly mean | 31st December 2005 |
| | 40 μg/m$^3$ | annual mean | 31st December 2005 |
| Particles ($PM_{10}$) | 50 μg/m$^3$, not to be exceeded more than 35 times a year | 24 hour mean | 31st December 2004 |
| | 40 μg/m$^3$ | annual mean | 31st December 2004 |
| Particles ($PM_{2.5}$) | 25 μg/m$^3$ | Annual mean | 2020 |
| | Target of 15% reduction in concentrations at urban background[4] | annual mean | In urban areas between 2010 and 2020 |
| Sulphur dioxide | 266 μg/m$^3$, not to be exceeded more than 35 times a year | 15 minute mean | 31st December 2005 |
| | 350 μg/m$^3$, not to be exceeded more than 24 times a year | hourly mean | 31st December 2004 |
| | 125 μg/m$^3$, not to be exceeded more than 3 times a year | 24 hour mean | 31st December 2004 |
| Polycyclic aromatic hydrocarbons | 0.25 ng/m$^3$ B(a)P[5] | Annual average | 31st December 2010 |
| Ozone | 100 μg/m$^3$, not to be exceeded more than 10 times a year | 8 hour mean | 31 December 2005 |

## 1.3 Scope of the Action Plan

The purpose of the Action Plan is to provide the means through which a local authority through joint working with relevant stakeholders, such as KCC and other relevant organisations, can deliver viable measures that will work towards achieving the Air Quality Objectives within an AQMA. The aim is also to encourage active participation in the achievement of action plan measures by consulting the local community and raising awareness of air pollution issues.

Local authorities are required to prepare a written Action Plan for an AQMA, setting out the action plan measures they intend to take forward and the potential costs and benefits of these measures. The Further Assessment provides the technical backup

[4] 25 μg/m$^3$ is a concentration cap combined with 15% reduction

[5] Benzo(a)Pyrene

for the measures to be included within the Action Plan. The Action Plan should refer to the findings of the Further Assessment in terms of source apportionment (i.e. where emissions are coming from) so that action plan measures are targeted appropriately.

The Action Plan should contain simple estimates of the costs and benefits and timescales for implementing the proposed action plan measures, so that measures can be prioritised for implementation and subsequently monitored. The Action Plan should also indicate how far the measures will work towards achieving the Objectives.

### 1.4 Reporting of Action Plan

The A26 AQMA has been declared due to road traffic emissions of nitrogen oxides.

KCC is the relevant transport authority for the A26 (AQMA) and will work jointly with TWBC on transport and other measures within the Borough. County Councils have a duty under section 86 (3) of the Environment Act 1995 to put forward proposed actions which they themselves can implement to work towards meeting the air quality objectives in AQMAs. KCC should include these measures within the air quality section of the Local Transport Plan (LTP).

The Action Plan reflects the relevant organisational responsibilities for actions within the AQMA and proposed measures (Section 6) are reported as:

- Direct actions proposed for the A26 AQMA (responsibility of TWBC and KCC);
    - Already being undertaken.
    - Measures proposed as part of Kent County Council Local Transport Plan, LTP2.
    - Those that require further work and research as to their feasibility and cost benefit in terms of improving air quality in the AQMA allowing for future more specific target setting.
- Indirect measures Borough-wide to improve air quality throughout the Tunbridge Wells area, including the AQMA (responsibility of TWBC and KCC).

## 2 OVERVIEW OF AIR QUALITY IN TUNBRIDGE WELLS

The main source of air pollution in the Borough is road traffic emissions from major roads, notably the A26, A21 and A264. An Air Quality Management Area (AQMA) was declared in November 2005 along the A26 where there were predicted exceedences of the annual mean Objective for nitrogen dioxide ($NO_2$). Other pollution sources, including commercial, industrial and domestic sources, also make a contribution to background pollution concentrations.

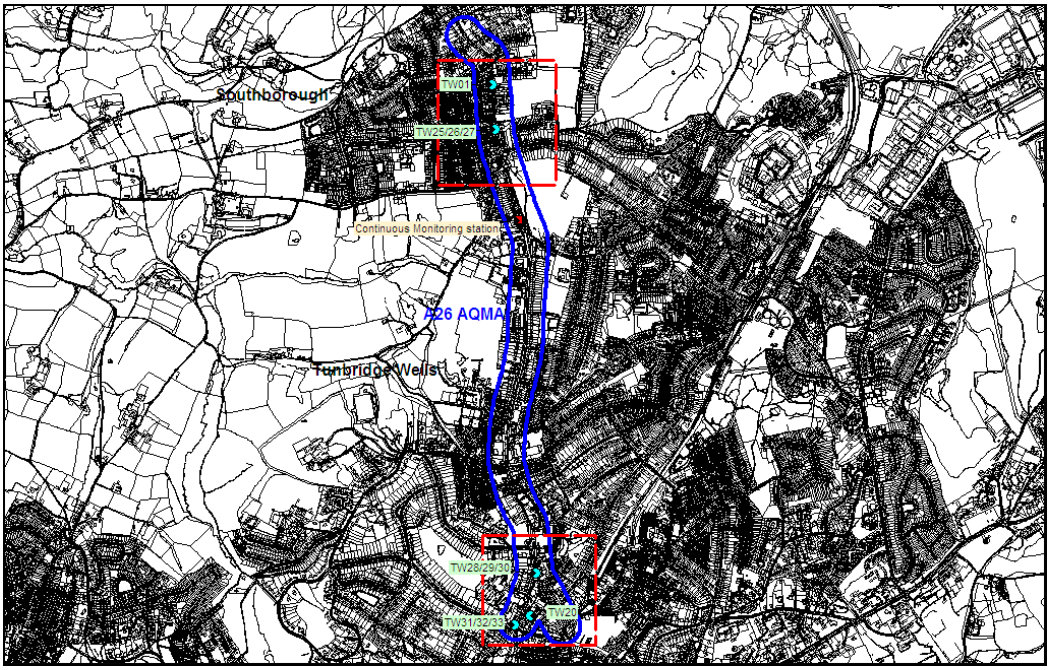
A summary of TWBC's second round of review and assessment of air quality, which commenced in 2003, is shown in Table 2. The individual stages are summarised briefly with respect to outcome below:

- *Updating and Screening Assessment*

The Updating and Screening Assessment (2003) was the first phase of the second round review and assessment. Similar to Stage One of the previous round, there was consideration of the seven pollutants of concern to health and an assessment was made as to whether Air Quality Objectives for these pollutants would be met. TWBC completed this in May 2003, with the conclusion that a Detailed Assessment was required for $NO_2$ along the A26 London Road at Mount Ephraim and Southborough due to road traffic emissions. All other Air Quality Objectives were expected to be met.

- *Detailed Assessment*

The Detailed Assessment (2004) concluded that there was a risk of exceedences of the annual mean $NO_2$ objective along the A26 London Road at Mount Ephraim and Southborough and an Air Quality Management Area was declared by the Council in November 2005. The AQMA covers a larger area than the predicted areas of exceedence, incorporating an 80m buffer along the A26 from Southborough to Mount Ephraim in Tunbridge Wells.




Reproduced with the Permission of Ordnance Survey © Crown Copyright Licence No. 100024298. AQMA outline shown in blue. Pollution hotspots, where exceedences have been identified are shown in red.

- *Further Assessment*

The Further Assessment (2008) results predicted exceedences of the $NO_2$ annual mean objective in 2007 within the A26 AQMA at Southborough and Mount Ephraim, Tunbridge Wells and confirmed that the original designation of the AQMA by Tunbridge Wells Borough Council for $NO_2$ was justified.

The results of the source apportionment indicate that road traffic emissions are the main source of $NO_X$ in the AQMA (68 - 79%). The HDV class vehicles are contributing disproportionately to $NO_x$ concentrations in the AQMA; contributing to half the $NO_X$ concentrations, but being only a small proportion (5 - 7%) of the vehicle fleet.

**Source apportionment of $NO_X$ within the AQMA at the building façade with maximum predicted concentrations in 2007**

| **$NO_X$ concentrations 2007** | **%** | **µg/m$^3$** |
|---|---|---|
| **Southborough** | | |
| Background | 21.5 | 36.4 |
| Road traffic | 78.5 | 133.0 |
| *HDV** | 42.7 | 72.3 |
| *LDV** | 35.8 | 60.7 |
| **Tunbridge Wells** | | |
| Background | 31.8 | 36.4 |
| Road traffic | 68.2 | 77.9 |
| *HDV** | 36.2 | 41.4 |
| *LDV** | 32.0 | 36.5 |
| **As proportion of road traffic emissions contribution* | | |

**Southborough**

In 2007, the maximum predicted $NO_x$ reduction required within the AQMA at the façade in Southborough is 66.1µg/m$^3$ (equivalent to a 39% improvement in $NO_X$) and $NO_2$ reduction is 14.5µg/m$^3$ (equivalent to a 27% improvement in $NO_2$).

By 2010, the maximum predicted $NO_x$ reduction required within the AQMA at the façade in Southborough is 35.7µg/m$^3$ (equivalent to a 25% improvement in $NO_X$) and $NO_2$ reduction is 8.1µg/m$^3$ (equivalent to a 17% improvement in $NO_2$).

**Tunbridge Wells**

In 2007, the maximum predicted $NO_x$ reduction required within the AQMA at the façade at Mount Ephraim, Tunbridge Wells is 11.0µg/m$^3$ (equivalent to a 10% improvement in $NO_X$) and $NO_2$ reduction is 2.6µg/m$^3$ (equivalent to a 6% improvement in $NO_2$).

By 2010, through the implementation of national policy measures, the $NO_X/NO_2$ concentrations are predicted to reduce to levels that meet the UK Air quality objectives.

Consequently, the formulation of an Action Plan should aim to reduce the levels of $NO_x/NO_2$ within the AQMA by the amounts specified above.

## Update for 2009

As part of local air quality management the local authority undertook a further round of review and assessment of air quality in 2009, with a detailed assessment for nitrogen dioxide ($NO_2$) completed in June 2009. The areas reviewed included:

- London Road/Major York's Junction; and
- Pembury Road, Tunbridge Wells.

The Detailed Assessment has been undertaken in accordance with DEFRA LAQM.TG(09) Guidance methodologies. The Detailed Assessment aims, through assessment of monitoring data and dispersion model predictions, to assess these two areas and determine whether the prescribed objectives are being met. Where exceedences are predicted to occur, the Detailed Assessment aims to define the area of exceedence to assist the Council in respect of subsequent Air Quality Management Area declaration.

The findings of the Detailed Assessment are:

Major York's Road/London Road Junction:

The modelling predicted widespread exceedences of the annual mean $NO_2$ objective in 2008 and 2010, at the Major York's Road/London Road Junction. The Council therefore now needs to progress to declaring an AQMA, based on predicted exceedences of the annual mean air quality objective for $NO_2$ and has commenced a further assessment within this area.

Pembury Road Area**:**

The modelling predicted exceedences in 2008 at three receptor locations modelled along Pembury Road. By 2010, this is limited to a marginal predicted exceedence of 40.2$\mu g/m^3$ at one location on Pembury Road, north of Sandown Park. The Council will therefore continue its current $NO_2$ monitoring programme in this assessment area in order to demonstrate compliance with the annual mean $NO_2$ objective, which will include a one year, real time air quality monitoring programme.

**Table 2: Summary of the second round review and assessment process for TWBC**

| Source | Updating and Screening Assessment (2003) | | Detailed Assessment (2004) | Further Assessment (2008) |
|---|---|---|---|---|
| Road Traffic | $SO_2$ | | Exceedence of the annual mean $NO_2$ Objective resulted in declaration of the A26 AQMA in Tunbridge Wells in November 2005, due to road traffic emissions. | Further assessment of $NO_2$ in AQMA.<br><br>Support for continuance of the AQMA – Action Plan required. |
| | $NO_2$ | ➔ | | |
| | $PM_{10}$ | | | |
| | Carbon monoxide | | | |
| | Benzene | | | |
| | 1,3 Butadiene | | | |
| | Lead | | | |

NB. Following completion of the USA 2006, the first stage of the third round of review and assessment, Defra requested that the Council consider further the compliance with the $PM_{10}$ 24 hour objective within the AQMA. This is considered within a Detailed Assessment 2008.

# 3 EXISTING POLICIES AND STRATEGIES TO IMPROVE AIR QUALITY

There are a number of related policies and strategies in place in March 2008, at the local and regional level that can be tied in directly with the aims of the Air Quality Action Plan, and will help contribute to overall improvements in air quality across the Borough.

As part of the update of the Action Plan a review of policies and strategies will be undertaken.

## 3.1 Draft South East Plan (Regional Spatial Strategy) (2006)

The South East England Regional Assembly (SEERA) submitted the draft South East Plan to Government on 31st March 2006. The draft Plan provides a framework for the region for the next 20 years to 2026. Consultation on behalf of an independent panel of inspectors ran from 31 March until 23 June 2006. The Examination in Public ran from 28 November 2006 until 30 March 2007 and is expected to lead to Government approval of a final South East Plan in early 2008.

The South East Plan is SEERA's term for the formal Regional Spatial Strategy for South East England, which will cover the period up to 2026. It provides the statutory regional framework that forms the context within which Local Development Documents and Local Transport Plans need to be prepared, as well as other regional and sub-regional strategies and programmes that have a bearing on land use activities. These include the regional economic and housing strategies as well as strategies and programmes that address air quality, biodiversity, climate change, education, energy, environment, health and sustainable development.

The Integrated Regional Framework (IRF) provides an essential part of the context for the Plan, establishing a shared regional vision and set of objectives, which all organisations in the region should use to try and achieve more sustainable development. It reflects overall Government policy on sustainable development. One of the IRF Objectives is *"To reduce air pollution and ensure air quality continues to improve."*

Maidstone and Tonbridge-Tunbridge Wells are considered as 'Regional Hubs'. Both are identified as accessible settlements of regional significance and the following policy relates specifically to these Regional Hubs.

*"Policy CC8c: Regional Hubs: Maidstone and Tonbridge-Tunbridge Wells*
*Local Development Frameworks will make provision for development at the Regional Hubs of Maidstone and at Tonbridge-Tunbridge Wells as follows:…..*
*ii Full and effective use of development capacity will be pursued within the Regional Hub of Tonbridge-Tunbridge Wells. This should provide for a balance of business, commercial and residential development with particular attention paid to meeting locally based needs for housing and business premises, and improving the links between the two urban areas. The prime consideration at the urban area of Tunbridge Wells will be the conservation of the built and natural environment, the setting of the town and its location within the Green Belt and High Weald AONB….."*

The Plan contains a number of relevant policies, which will work towards improving air quality and reducing transport emissions:

*"Policy NRM7: Air Quality*
*Local authorities and other relevant bodies should seek an improvement in air quality in their areas so that there is a significant reduction in the number of days of medium and high air pollution by 2026. Local Development Documents and development control can help to achieve improvements in local air quality through:*
*i Ensuring consistency with Air Quality Management Plans*
*ii Reducing the environmental impacts of transport and congestion management, and support the use of cleaner transport fuels*
*iii Mitigating the impact of development and reduce exposure to poor air quality through design, particularly for residential development in areas which already, or are likely to, exceed national air quality objectives*
*iv Encouraging the use of best practice during construction activities to reduce the levels of dust and other pollutants."*

*"Policy T1: Manage and Invest*
*Relevant regional strategies, Local Development Documents and Local Transport Plans will ensure that their management policies and proposals:*
*i Are consistent with, and supported by, appropriate mobility management measures*
*ii Achieve a rebalancing of the transport system in favour of non-car modes as a means of access to services and facilities*
*iii Foster and promote an improved and integrated network of public transport services in and between both urban and rural areas*
*iv Encourage development that is located and designed to reduce average journey lengths*
*v Improve the maintenance of the existing transport system*
*vi Include measures that reduce the overall number of road casualties*
*vii Include measures to minimise negative environmental impacts of transport and, where possible, to enhance the environment and communities through such interventions."*

*"Policy T7: Parking*
*Local Development Documents and Local Transport Plans should, in combination:*
*i Adopt restraint-based maximum levels of parking provision for non-residential developments, linked to an integrated programme of public transport and accessibility improvements*
*ii Set maximum parking standards for B1 land uses within the range 1:30 m2 and 1:100m2*
*iii Set maximum parking standards for other non-residential land uses in line with PPG13, reducing provision below this in locations with good public transport*
*iv Include policies and proposals for the management of the total parking stock within regional hubs that are consistent with these limits v Apply guidance set out in PPG3 on residential parking standards, reflecting local circumstances*
*vi Support an increase in the provision in parking at rail stations where appropriate*
*vii Ensure the provision of sufficient cycle parking at new developments including secure cycle storage for new flats and houses which lack garages."*

*"Policy T8: Travel Plans and Advice*
*All major travel generating developments must have a travel plan agreed and implemented by 2011. Local authorities should ensure that their Local Development Documents and Local Transport Plans identify those categories of major travel generating developments, both existing and proposed, for which travel plans should be developed. Local Transport Authorities should also consider piloting the concept of transport planning advice centres for regional hubs in their Local Transport Plans."*

## 3.2 Kent and Medway Structure Plan 2006

The Kent and Medway Structure Plan, produced jointly by Kent County Council and Medway Council, was adopted in July 2006 and provides for development and change in Kent and Medway up to 2021. The Structure Plan policies will provide the foundation for the Tunbridge Wells Local Development Framework, together with the emerging South East Plan. This will replace the Structure Plan when adopted.

There are three policies relating to air quality in the Kent and Medway Structure Plan:

**Policy NR5: Pollution Impacts**
"The quality of Kent's environment will be conserved and enhanced. This will include the visual, ecological, geological, historic and water environments, air quality, noise and levels of tranquillity and light intrusion.
Development should be planned and designed to avoid, or adequately mitigate, pollution impacts. Proposals likely to have adverse implications for pollution should be the subject of a pollution impact assessment.
In assessing proposals local authorities will take into account:
a) impact on prevailing background pollution levels; and
b) the cumulative impacts of proposals on pollution levels; and
c) the ability to mitigate adverse pollution impacts; and
d) the extent and potential extremes of any impacts on air quality, water resources, biodiversity and human health.
Development which would result in, or significantly contribute to, unacceptable levels of pollution, will not be permitted."

**Policy NR6: Development Sensitive to Pollution**
"Development which would be sensitive to adverse levels of noise, air, light and other pollution, will not be supported where such conditions exist, or are in prospect, and where mitigation measures would not afford satisfactory protection."

**Policy NR7: Air Quality Management Areas**
"The local authorities are required to:
(a) review and assess air quality and, where necessary, declare Air Quality Management Areas;
(b) work towards improving air quality in Air Quality Management Areas through preparation of an Air Quality Action Plan.
The scale and character of development in, or adjoining such areas, should be controlled so as not to adversely affect this improvement."

## 3.3 Local Transport Plan for Kent (2006 – 2011)

In 1998, the Government published a Transport White Paper "A New Deal for Transport" which outlined their commitment to a more integrated and sustainable transport system with greater emphasis on alternative forms of transport to the private car. The Government also introduced a system of Local Transport Plans (LTPs) which each highway authority had to prepare every five years which would outline their aims to improve local transport and the funding they required to do this. In the second round of LTPs 2006-11, the Government outlined four shared priorities for local transport, one of which was air quality and required LTPs to consider improvements to the transport network which would reduce air pollution in those Air Quality Management Areas declared in response to exceedances by local traffic.

The Local Transport Plan for Kent 2006-11, which was submitted in March 2006, aims to "stabilise and, where possible, reverse the adverse effect of transport and its infrastructure on the natural and built environment and on local communities". Specifically, the LTP contains an air quality policy EHC1 "to seek a reduction in traffic pollution on the local road network".

Since Kent lacks one large urban area with a population above 250,000, KCC is not currently required to set an LTP target for reducing congestion, but congestion and its impact on Kent's economy and communities is a priority for KCC. Tunbridge Wells has been highlighted as one of the urban areas, which suffer from the worst congestion issues. The road network in Tunbridge Wells town centre is heavily congested in the morning and evening peak periods. The A26 through Southborough also suffers congestion throughout the day, being the main link between Tonbridge, the A21 and Tunbridge Wells.

Modal shift is needed to alleviate existing congestion problems, and the Integrated Transport Programme provides investment in the public transport network. This includes supporting the Quality Bus Partnership in Tunbridge Wells to encourage public and private sector investment in the local network to enhance quality, efficiency and reliability and increase patronage.

Congestion issues are also being addressed by traffic management measures and engineering schemes. In partnership between the Council and Kent County Council outline proposals are being developed to commence a study of travel options to meet the needs of the Community and re-evaluation of Park & Ride options for Tunbridge Wells. This will also be accompanied by a series of improvements to major junctions along the A26, A264 and A267.

The AQMA on A26 London Road, Tunbridge Wells will benefit from the traffic management measures planned.

Relevant proposed LTP schemes likely to have direct and indirect impacts on local air quality within the A26 AQMA are referred to where relevant within this Action Plan.

### 3.4 Kent Environment Strategy (2003)

The Kent Environment Strategy was drawn up by Kent County Council in partnership with the District Authorities. The objectives of the Strategy relevant to air quality are shown in Table 3.The Kent Environment Strategy is currently under review and a draft 2009 Strategy is out for consultation until January 2010.

**Table 3: Kent Environment Strategy Objectives for Air Quality**

| What? | Why? | Who? | When? |
|---|---|---|---|
| Meeting National Air Quality Objectives | | | |
| Develop and implement strategies and action plans to work towards achieving the National Air Quality Objectives. | To reduce the risks on health and the environment from high levels of pollution. | DCs & MC assisted by KMAQP | Prepare, implement and revise AQMA Action Plans from 2002; designation of further AQMAs as necessary |
| Reducing the impact on environmental health | | | |
| Establish and disseminate information about Nitrogen Dioxide ($NO_2$), Sulphur Dioxide ($SO_2$), Carbon Monoxide (CO), Particulates ($PM_{10}$ and $PM_{2.5}$) and Ozone ($O_3$) levels. | To provide a better understanding of air pollution, determine trends, inform the future action required and raise the awareness of those susceptible to high levels of pollution. | Kent and Medway Air Quality Monitoring Network (DCs& MC) | - Monthly and annual monitoring reports<br>- Daily bulletins via the internet (www.kentair.org.uk) |
| Planning new development appropriately | | | |
| Incorporate air quality policies in the Kent and Medway Structure Plan and District Council Local Plans informed by the Kent and Medway Air Quality Model's (KMAQM) predictions of the air quality impacts associated with cumulative effects of proposed new development. | To minimise the impact on air quality from future development across Kent, particularly in areas identified as having poor air quality. | KCC, DCs & MC | - KMSP - Draft on deposit 2003 Local Plan Review – ongoing<br>- Ongoing use of the KMAQM to inform planning application decisions |
| Raise awareness and encourage greater interaction amongst the relevant decision-makers including environmental health, transport and land use planning officers. | To ensure that the impact of development on air quality is appropriately assessed. | KMAQP | Ongoing |
| Regulate industrial processes through Integrated Pollution Prevention Control (IPPC) and Local Air Pollution Control (LAPC) and raise environmental standards through the use of environmentally friendly technology. | To minimise the impact of current and proposed industrial processes and associated emissions such as volatile organic compounds. | EA, District Councils, DCs & MC | - Ongoing IPPC and LAPC regulation<br>- Raised environmental standards as part of 4 year review of IPPC and LAPC authorisations<br>- Ongoing through planning application decisions |
| Incorporate more sustainable forms of transport, incentives and traffic management measures into the Local Transport Plan (LTP). | To move towards methods of transport which cause less pollution and promote walking, cycling and public transport. | KCC in consultation with DCs & MC | Strengthen policies in Local Transport Plan by 2004 |
| Tackling transboundary pollution | | | |
| Tackle transboundary pollutants (i.e. ozone and particles) at a regional level by sharing information and working together with neighbouring authorities in the UK and northern France. | To address pollution at a regional level as airborne pollution does not recognise local authority boundaries. | KCC on behalf of the KMAQP | Ongoing through transnational projects |

The Kent Environment Strategy Progress Report (2007) provides an update with respect to progress with actions relating to air quality, as shown below:

- Despite reductions in some air pollutants, overall air quality in Kent is showing no clear improvement;
- Long-standing problems have been exacerbated by traffic growth, increased ozone pollution from distant sources and extreme weather such as heat waves which are becoming more likely as a result of global warming;
- The identification of new Air Quality Management Areas (AQMAs) is an indication of the problem – but only a first step in solving it;
- The effort going into 'monitoring and action planning' is still not being matched by 'implementation' of actual measures to improve air quality;
- Reducing emissions from HGV and car traffic remains the key challenge to improve air quality.

The Kent Partnership will be reviewing the Kent Environment Strategy in 2007 and publishing a revised Strategy early in 2008.

### 3.5 Sustainable Community Plan for Tunbridge Wells Borough 2006 - 2011

The Sustainable Community Plan has been developed through the Tunbridge Wells Borough Community Plan Partnership. It reflects the priorities set out in the 'Vision for Kent', the Community Strategy for the county, and shows how these will be addressed at a local level in the borough.

The Sustainable Community Plan has nine themes:

- Safeguarding the Environment
- Maintaining a thriving local economy
- Enabling people to take part in and enjoy leisure facilities
- Maintaining community safety and reducing fear of crime
- Transport - getting around the borough
- Meeting the need for housing
- Promoting health and improving well-being
- Encouraging social inclusion by supporting independence
- Learning for all

To take forward the aims of the theme 'Safeguarding the Environment', representatives from a number of organisations and groups in the environment field have joined together to form the Tunbridge Wells Borough Environment Forum. This will enable key environmental issues to be discussed, information sharing and development of partnership working.

Specifically with respect to air quality, the Plan highlights the importance of the continuance of air quality monitoring and that appropriate action should be taken to reduce pollution levels. It also highlights the need to be proactive in reducing pollution through the promotion of more sustainable transport options, and by considering impacts on air quality as part of the assessment for planning applications.

### 3.6 Draft Strategic Plan (2008 - 2011)

The Council has produced a revised draft Strategic Plan for 2008- 2011, which builds on the 2007-2010 Strategic Plan. It sets out the Council's approach to delivering against its corporate priorities and will underpin the Council's performance over the next three years. The Strategic Plan takes into account national, regional, sub regional and local priorities which together, contribute to how the Council plans, delivers and manages its performance.

In 2005, the Council set itself four corporate priorities:
1. Promote and maintain a thriving and diverse local economy;
2. Care for our environment;
3. Have housing suitable for local people;
4. Develop safer and stronger communities.

Under each priority, the Council has set a number of corporate objectives (COs) and criteria for success.

The Corporate Objectives (March 2006) of most relevance to air quality include:
*CO2: Working with partners to improve the efficiency of the transport system including parking, traffic management systems, congestion, pedestrian access and including lobbying for improvements to the A21 and A228*
*CO3: Reach a strategic view on parking issues including the merits of Park and Ride*
*CO7: Develop proposals to improve air quality in the Southborough and Tunbridge Wells Air Quality Management Area*

### 3.7 Tunbridge Wells Borough Council Local Development Framework

The Local Development Framework (LDF) together with the Regional Spatial Strategy (South East Plan) provides the framework for planning in Tunbridge Wells Borough. The LDF is a collection of planning documents that will eventually take over from the current Local Plan and the Kent and Medway Structure Plan.

Tunbridge Wells Borough Council has produced a Local Development Scheme (LDS), which sets out which documents will be produced. The planning policy documents that will be produced are Development Plan Documents (DPDs) or Supplementary Planning Documents (SPDs).

Policies in the adopted Local Plan (March 2006) are saved for three years or until such time as appropriate replacement policies are included within the Core Strategy or subsequent DPDs. The Core Strategy sets out the key elements of the planning framework for the Borough. It comprises a vision and strategic objectives for the area, along with a spatial strategy, a number of core policies and a monitoring and implementation framework. Consultation on the Core Strategy Preferred Options Report took place from December 2007 – January 2008.

### 3.8 Tunbridge Wells Borough Local Plan (2006)

The adopted Local Plan, which forms part of the overall development plan for Tunbridge Wells up to 2011, details the land use planning policies and proposals for the Borough. The Tunbridge Wells Borough Local Plan (2006) supersedes the previously adopted Tunbridge Wells Borough Local Plan (1996) and forms part of the statutory development plan for the area. This comprises the Kent Structure Plan (1996) and subsequently the Kent and Medway Structure Plan (2006); together with

the Kent Minerals Local Plan and the Kent Waste Local Plan and the South East Plan Regional Spatial Strategy.

The overall aim of the Local Plan is to promote sustainable development and for that reason the Planning Strategy is guided by three strategic objectives:
1. To protect the unique, high-quality environmental character of the area and to promote enhancement by encouraging excellence in the quality of all development;
2. To conserve finite, non-renewable resources such as land, energy, water, soil and air quality; and
3. To retain and provide an appropriate level and distribution of development to meet identified housing, economic and community needs.

It is fundamental to the achievement of the aims of the Air Quality Action Plan to have a Local Plan that recognises the importance of air quality in terms of the environmental impact of development and the need for sustainable transport measures. Tunbridge Wells Borough Local Plan incorporates relevant policies with respect to sustainable transport objectives, as outlined below.

*"Policy TP1: Transport Assessments and Travel Plans*

*Proposals for large-scale non-residential development will be required to be accompanied by a Transport Assessment and a Travel Plan to demonstrate the adequacy of transport infrastructure to serve the development.*

*Where adequate transport infrastructure is not available to serve the development, the Local Planning Authority will seek the provision of, or contributions towards, appropriate measures which will address the identified inadequacy and which assist walking, cycling, public transport, other highway improvements and/or Park and Ride provision.*

*Transport Assessments and Travel Plans should also accompany development proposals for new or significantly expanded schools, and may also be required by the Local Planning Authority in support of a development which would otherwise be unacceptable due to the level of traffic which would be generated."*

Policies TP2 and TP3 also set out, for smaller-scale non-residential development and larger-scale residential development, the requirements for Transport Assessments and expected contributions towards, appropriate measures which will address any identified inadequacy in transport infrastructure and which assist walking, cycling, public transport and other highway improvements.

### 3.9 Tunbridge Wells Borough Transport Strategy (2003)

Tunbridge Wells Borough Council and Kent County Council worked in partnership to produce the Tunbridge Wells Borough Transport Strategy. This was adopted in July 2003 and provides a framework for the future development and provision of transport services and facilities in the Borough.

Strategy objectives for Kent include strategic highway and rail improvements, the provision of long distance pedestrian and cycle routes and concentrating long distance traffic on appropriate roads. Transport improvements to achieve these objectives include major rail schemes such as the Thameslink Project, with connections from north London linking to Sevenoaks. Equally, feasibility studies have been conducted to consider the reopening of the Uckfield to Lewes line and

potentially linking Tunbridge Wells west to Eridge. Improvements are also being considered to the A21 and A228 and the establishment of a Quality Freight Partnership.

The Action Plan for the urban area formed by Tunbridge Wells and Southborough, includes traffic management measures and public transport improvements to relieve congestion on the main routes, including the A26 (AQMA). Junction improvements at key junctions in the A26 AQMA are proposed e.g. St John's Road/Grosvenor Road and St John's Road/Yew Tree Road/Speldhurst Road junctions. Public transport improvements include working with bus operators to develop bus priority schemes as part of a Quality Bus Partnership and supporting Park & Ride proposals.

The Tunbridge Wells Borough Transport Strategy 2003 is currently under review.

### 3.10 Environment Strategy for Tunbridge Wells Borough (2005)

The Environment Strategy has been produced by Tunbridge Wells Borough Council, in consultation with partner organisations and local interest groups with the aim to provide a framework to tackle local environmental issues for five years (to 2010). The objectives of most relevance to improving air quality are set out below:

Objectives for air quality:
- To monitor air quality against national standards, and take action to address potential problems as they arise.
- To raise awareness of air quality issues and of actions that the public can take to improve air quality.

Objectives for transport, traffic and access:
- To reduce the environmental impacts of personal travel and goods transport within the borough.
- To encourage safer and more efficient use of motor vehicles.
- To promote more environmentally friendly means of transport, with dedicated routes where possible.
- To ensure adequate levels of access to basic needs and services, particularly for people without personal transport.

The Environment Strategy Year 1 Monitoring Report showed that good progress has been made on the majority of targets. However, targets were missed with respect to travel and transport; including mid-term review of the Borough Transport Strategy and implementation of the Council Travel Plan.

### 3.11 Carbon Management Action Plan (2006)

The Carbon Management Action Plan (2006) sets out activities to develop and enhance the role of Tunbridge Wells Borough Council towards energy usage and carbon management. There is an increasing expectation from Government for local authorities to take a pivotal role in achieving national carbon reduction targets. The actions in the Plan work towards reducing carbon emissions that are generated through energy use.

Measures to reduce energy use are expected to have benefits to air quality through reductions in background concentrations of pollutants.

### 3.12 Nottingham Declaration

Tunbridge Wells Borough Council signed the Nottingham Declaration on 9 February 2007 acknowledging the increasing impact that climate change will have on the community and the Council's commitment to tackling the causes and effects of a changing climate on the borough.

The Council, through this Declaration, is committed to:

- Work with Central Government to contribute, at a local level, to the delivery of the UK Climate Change Programme, the Kyoto Protocol and the target for carbon dioxide reduction by 2010.
- Participate in local and regional networks for support.
- Within the next two years develop plans with partners and local communities to progressively address the causes and the impacts of climate change, according to local priorities, securing maximum benefit for local communities.
- Publicly declare, within appropriate plans and strategies, the commitment to achieve a significant reduction of greenhouse gas emissions from the authority's operations, especially energy sourcing and use, travel and transport, waste production and disposal and the purchasing of goods and services.
- Assess the risk associated with climate change and the implications for the Council's services and local communities of climate change impacts and adapt accordingly.
- Encourage all sectors in the local community to take the opportunity to adapt to the impacts of climate change, to reduce their own greenhouse gas emissions and to make public their commitment to action.
- Monitor the progress of the plans against the actions needed and publish the results.

## 4 FINANCING

Under LTP2, Kent County Council has allocated funding to a number of schemes in the Borough of Tunbridge Wells that tie in with Action Plan measures to improve air quality in the area, such as traffic management measures and encouraging the uptake of travel plans.

Annual funding for development of Quality Bus Partnerships, Safer Routes to School, Cycle Strategy and Walking Strategy are being made available through the LTP. TWBC will work together with KCC to review current schemes for the area in the light of the declaration of the A26 AQMA. Additional schemes will be implemented where possible to secure further improvements in air quality.

Other measures to improve air quality in the A26 AQMA and Borough wide, such as air quality monitoring, specific targets within the action pan and promotional activities, will be funded by TWBC, or by developers if appropriate e.g. through the use of S106 contributions from developments in the A26 area. In addition, an Air Quality Grant has been secured from Defra to assist with action planning, and this is being used as part of a transport model development for Tunbridge Wells, which will aid in the targeting of effective air quality improvement measures.

## 5 CONSULTATION

Under Schedule 11 of the Act, Local Authorities are required to consult on their draft LAQM Action Plan. It is important for the success of the Action Plan to have involvement by all local stakeholders including local residents, community groups and local businesses in drawing up the Action Plan, in addition to their active participation in achieving the action plan measures. The Action Plan has been drawn up for consultation with relevant representatives from TWBC and KCC, through the A26 AQMA Air Quality Steering Group.

The following is a list of statutory and non-statutory consultees to which this draft Plan will be sent:

- The Secretary of State
- The Environment Agency
- Primary Care Trusts
- Kent County Council
- TWBC Councillors and Officers
- Neighbouring local authorities
- Local residents within and bordering the AQMA
- Relevant local businesses, community groups and forums
- Other relevant local stakeholders

All comments from both Statutory and non-statutory consultees received on the draft Action Plan will be considered and incorporated where appropriate into the final Action Plan**.** The timescale for consultation shall be a minimum of 8 weeks.

## 6 PROPOSED MEASURES

The following section outlines a number of proposed measures; those directly related to the A26 AQMA and those more indirect, general measures, which aim to improve air quality throughout the Borough.

**Direct measures (DM)** aim to reduce $NO_2$ concentrations within the AQMA, concentrating on the dominant sources of emissions – road traffic and are considered within the context of the longer term transport strategy for the area.

**General measures (GM)** target those emissions within a more general area, and aim to further reduce background levels of pollution above and beyond that likely to be achieved by existing national and international agreements and policy.

The ranking of options has been based on professional judgement through the assessment of a number of considerations; including the costs and benefits of all the options, feasibility and acceptability, and whether they will achieve the Air Quality Objective. It is likely that the $NO_2$ annual mean Objective will only be achieved through a combination of measures.

At this stage the impact assessment is qualitative. Quantitative air quality impact assessment of the principal 2nd LTP measures will be undertaken when relevant information on the detailed schemes becomes available.

The costs are provided as:

- 'Low' (up to £100,000);
- 'Moderate' (between £100,000 – £1 million); and,
- 'High' (greater than £1 million).

The benefits are provided as:

- 'Low' (<0.2µg/$m^3$);
- 'Moderate' (between 0.2 – 1 µg/$m^3$); and,
- 'High' (greater that 1 µg/$m^3$).

The direct measures proposed within the air quality management area are; -

- Those already being undertaken.
- Measures proposed as part of Kent County Council Local Transport Plan, LTP2.
- Those that require further work and research as to their feasibility and cost benefit in terms of improving air quality in the AQMA allowing for future more specific target setting.

## 6.1 Proposed Direct Measures for the A26 AQMA

The following provides the outcome of discussions with TWBC and KCC with respect to a number of direct action plan measures that have been proposed to reduce $NO_X$ emissions in the AQMA in pursuit of the annual mean Air Quality Objective and EU Limit Value.

The A26 is a key strategic route through Tunbridge Wells and Southborough for traffic travelling to/from the north and therefore achieving the necessary reductions in traffic on this road to achieve the $NO_2$ annual mean objective/EU Limit value by 2010 is considered challenging. The Further Assessment modelling has predicted that in 2010 exceedences of the air quality objective would still occur along the A26, without the introduction of local intervention measures.

The solution to the air quality problem in the A26 AQMA is likely to be through the implementation of a package of measures, with individual measures being insufficient on their own to achieve the $NO_2$ annual mean Air Quality Objective and EU Limit Value.

### 6.1.1 Traffic Model Development VISUM

Tunbridge Wells Borough Council is working in conjunction with Kent County Council to develop a multi-modal transport model, (VISUM), which will be used to assess transport plans and policies for the Town. Tunbridge Wells is recognised as a regional transport hub in conjunction with neighbouring Tonbridge. The provision of an integrated sustainable transport service and associated infrastructure will play a significant part in addressing local transport issues. The development of VISUM and the assessment of transport plans and policies are essential in ensuring local transport does not adversely affect the air quality, but also plays a key part in working towards improving the local air quality.

Funding provided by DEFRA towards air quality action planning is being used to support and use VISUM to identify measures that will be more effective in ensuring improvements to local air quality and therefore enable action plan measures to be more accurately targeted and prioritised.

**DM 1: DEFRA air quality grant funding for action planning has been used to support the development of VISUM a transport model being produced by Jacobs on behalf of Tunbridge Wells and KCC. The model will be able to be used to inform the Action Plan and target measures more effectively and enable prioritisation of actions. The VISUM project is due to be completed in August 2010.**

### 6.1.2 Traffic Management Measures

A number of Traffic Management measures are being considered for implementation along the A26, through the Borough Transport Strategy and Kent Local Transport Plan 2006 -2011. Tunbridge Wells Borough Council will work in partnership with Kent County Council and neighbouring local authority Tonbridge & Malling Borough Council to secure improvements along the A26.

Junction alterations A26 (north) Royal Tunbridge Wells and Southborough:

A review is to be undertaken of the operation of major junctions on the A26 (north) to improve junction efficiency and enhance protection of vulnerable road users. [Borough Transport Strategy Action 3.1.4]. The locations include:

- St John's Road/Grosvenor Road junction [Borough Transport Strategy Proposal B3]. Introduce gateway treatment to junction, retaining operation as a roundabout.
- London Road/Mount Ephraim junction [Borough Transport Strategy Proposal B5]. Improve the right-turn into Mount Ephraim. Manage Long term parking outside shops on Mount Ephraim. Indicative cycle lane markings to be provided across the junction.
- London Road/Yew Tree Road/Speldhurst Road junction [Borough Transport Strategy Proposal D6]. Review signalised junctions to improve operation. Provide additional stop line capacity on side roads and review feasibility of bus and cycle advance stop lines. Introduce pedestrian phase to allow safer crossing. Some of the proposed changes to this junction such as a pedestrian phase have already been introduced.

**DM 2: TWBC will work in partnership with KCC and Tonbridge & Malling Borough Council to implement traffic management improvements along the A26 as appropriate.**

### 6.1.3 Public Transport Improvement Measures

TWBC will work in partnership with KCC to implement bus infrastructure to support the Quality Bus Partnership for Royal Tunbridge Wells and Southborough [Borough Transport Strategy Action 3.1.19, 3.4.5 and 3.4.9]. The aim is to improve bus usage and reliability on selected corridors through partnership working with local bus operators.

The possibility of explore improvements in emissions standards through Quality Bus Partnerships is high, such as through increased fleet renewal. It is essential that this area of the QBP is reviewed further with the potential for implementation progressed.

**DM 3: TWBC will continue to support the Quality Bus Partnership for Royal Tunbridge Wells and Southborough and will also consider the opportunities the QPB affords to improve vehicle emissions.**

There are proposals in the Borough Transport Strategy and Kent Local Transport Plan to extend bus priority measures on the A26 (north) [Borough Transport Strategy Action 3.1.23] to improve bus reliability and reduce journey times on key corridors. The A26 London Road, Southborough and St John's Road bus priority scheme [Borough Transport Strategy Proposal PR5] will seek improvements to bus lane provision and hurry-calls at signal controlled junctions.

In addition, there are proposals for a Bus Real Time Information and Priority System for Tunbridge Wells and Southborough and to achieve full functionality of the Kent Busnet system. This will include complete fitting of GPS systems on buses and traffic light controlled junctions [Borough Transport Strategy Action 3.4.4 and 3.4.6] to provide reliable bus service information and reduce bus journey times to increase bus usage.

**DM 4: TWBC will continue to work in partnership with KCC to implement A26 (north) Bus Priority Measures**

Park and Ride for Tunbridge Wells has been proposed within the Borough Transport Strategy and Kent Local Transport Plan 2006 -2011. Proposals to construct priority Park and Ride sites [Borough Transport Strategy Action 3.1.26] aim to reduce car trips into the town centre to reduce congestion and maintain the viability of the town centre. There are economic benefits, the impact with regards to air quality will need to be identified as there may be more limited benefits in terms of less car-km being driven.

The draft Strategic Plan 2008 – 2011 considers the issue of improving the access to the town centre and the Borough further. The Council will jointly work with Kent County Council and Tonbridge and Malling Borough Council to commence a study of travel options to determine the suitability of an enhanced public transport system. It will also be essential to fully assess the impact in relation to air quality.

**DM 5: TWBC will continue to work in partnership with Kent County Council to undertake an initial study, which will assist in establishing a strategy for determining the suitability of an enhanced public transport system for Royal Tunbridge Wells and Tonbridge at a strategic level. The aim of the Action Plan is to support an effective integrated transport strategy which forms part of the Transport review. This will also include the potential to review any accelerated uptake of low emissions busses.**

### 6.1.4 Tunbridge Wells Transport Strategy

The current Tunbridge Wells Transport Strategy 2003 is under review and was developed in conjunction with Kent's first Local Transport Plan 2001/06. The Kent LTP 2001/06 was superseded in March 2006 and hence the Borough's transport strategy is being revised to take into account the achievements of LTP2006/11 and take on board the development of LTP3.

**DM 6: TWBC is working with KCC to review and develop a new Tunbridge Wells Transport Strategy. Amongst its key objectives the Strategy will also recognise air quality as one of its aims and objectives. Joint working initiatives and reviews will be established to enable action planning to be progressed to develop more specific targeted and cost benefit assessed actions for improving air quality.**

### 6.1.5 Heavy Duty Vehicle Emissions

The Further Assessment clearly shows that HDV contribute disproportionately to $NO_x$ concentrations in the AQMA; contributing to half the $NO_X$ concentrations, but being only a small proportion (5 - 7%) of the vehicle fleet. Therefore, further work is required in relation to targeting these emissions more effectively.

TWBC will in partnership with KCC to consider a review the local freight polices and assess mechanisms for reducing emissions. This could include improvements to vehicle standards, the development of local voluntary schemes such as the Sheffield 'Eco-Star' scheme which recognises and highlights the best environmental and fuel

efficiency practice amongst Freight and Bus fleets. Similarly, a review of Low Emission Zones in relation to HGV's will be undertaken.

**DM 7: TWBC as part of the Transport Strategy review will investigate possible partnership work with Kent County Council to assess the feasibility to review freight policies and possible identify a series of specific measures aimed at reducing HGV emissions. The feasibility of developing Low Emission Zones for HGVs will be also explored further in conjunction with voluntary schemes.**

### 6.1.6 Parking Measures

The Kent Local Transport Plan 2006 – 2011 includes a strategy for tackling congestion which comprises five broad approaches; one of which is active management of the availability, cost and enforcement of parking provision at the journey destination.

In Tunbridge Wells and Southborough, parking issues have been identified as contributing to congestion issues.

Borough Transport Strategy D2 -Southborough short-stay car park: A package of improvements including additional lighting, improved enforcement of short-stay restrictions, improvements to pedestrian footpath at northern end and additional spaces.

Borough Transport Strategy D3 - London Road parking restrictions: On-street parking and loading restrictions through shopping area. Improve pedestrian footpaths/crossings and bus stop facilities including provision of lay-bys where possible. Road appearance may be altered to encourage slower speeds.

**DM 8: TWBC are enforcing local parking restrictions in Southborough and Tunbridge Wells (Mount Ephraim Road)**

### 6.1.7 Travel Plans

A Travel Plan is a general term for a package of tailored measures to encourage the use of sustainable methods of transport and reduce the reliance on the private car, particularly single occupancy travel. They can be for one or a group of organisations and involve the development of a set of mechanisms, initiatives and targets that together can reduce the environmental and health impacts of travel. Using alternative fuels and home working can also be included. Travel Plans are also being developed for schools, residential developments and area-wide, including mixed use developments.

A School Travel Plan is a set of measures to help cut the number of car journeys people make to school, encourage more journeys by public transport, and increase walking and cycling. There are a number of schools within or near to the A26 AQMA, where implementation of School Travel Plans will be of particular significance.

- Tunbridge Wells Boys Grammar School (A26)
- The Skinners' School (A26)
- St Gregory's Comprehensive School (A26)
- Tunbridge Wells Girls' Grammar School (A26)

- Beechwood Sacred Heart (A264)
- Tunbridge Wells High School (A264)

The 2009 school census update results indicate a 2% shift from single occupancy car trips in the borough, compared to 2008 data. That's a significant achievement and keeps the County on a trajectory to achieve a 5% shift by 2011/12.

A Workplace Travel Plan should be tailored to the needs of individual businesses. It considers journeys from home to work, but can also include business journeys, travel by visitors, deliveries, contractors and company cars. Large organisations may benefit from a whole range of new ideas and changes, while small businesses may only need to make one or two very simple changes to make a big difference. 'New Ways 2 Work' is a KCC led initiative to encourage everyone from small businesses to major corporations to look more closely at the impact which commuting and business travel has on their staff, productivity and corporate image. This promotes simple steps that organisations can take, such as setting up a car sharing scheme, or asking for KCC help to set up a comprehensive Workplace Travel Plan.

The 2nd LTP objective for Workplace Travel Plans is to approach all major employers with more than 200 personnel and offer assistance to establish Sustainable Travel Plans and assist in the implementation of 10 Travel Plan's per year. Within Tunbridge Wells there is already a planning requirement for all new business developments likely to generate significant travel demand and/or travel movement to submit travel plans as part of their planning permission. TWBC will work in partnership with KCC to target those organisations in the borough which are generating high volumes of traffic, notably those impacting on the A26 AQMA.

The Government is keen for local authorities to demonstrate their commitment to delivering cleaner air by leading by example and therefore the implementation of a Council Travel Plan is a key measure to take forward in the Plan.

TWBC do not currently have an adopted Council Travel Plan. However, staff already can take advantage of a flexible working/home working policy. In addition there are three spaces in the Council car park dedicated for vehicles where staff choose to car share.

**DM 9: TWBC will continue to support and work with KCC to increase uptake and implementation of School and Workplace Travel Plans; particularly where likely to impact on the A26 AQMA**

**DM 10: TWBC will investigate the feasibility of develop and implementing a Borough Council Travel Plan**

### 6.1.8 Cycling Measures

The Borough Transport Strategy contains an action [Borough Transport Strategy Action 3.9.7] to improve the A26 cycle lanes. Cycle lanes on the A26 (north) will be reviewed and upgraded where practicable. The aim is to provide a network of safe continuous and integrated facilities for cyclists and increase trips made by cycling. This will be implemented and funded through the Kent LTP.

**DM 11: TWBC will work in partnership with Kent County Council to review and if appropriate support improvements to Tunbridge Wells and Southborough Local Cycle Network. A cycling strategy is being proposed as part of the Tunbridge Wells Transport Strategy.**

### 6.1.9 Land Use Planning

Section 106 agreements (S.106), or planning obligations, are legal agreements between local authorities and developers, which are linked to planning permission for a development. Section 106 agreements are drawn up when it is considered that a development will have negative impacts that cannot be dealt with satisfactorily through conditions in the planning permission.

To provide support to local plan policies, the development of a supplementary planning document, SPD, for air quality assessments of developments and, in particular, for development, which may impact on an AQMA is recommended in the Policy Guidance LAQM.PG (03), as updated by PG (09). The development of planning documents will be essential to ensure a consistent approach to development and air quality is taken.

**DM 12: During the preparation of the Local Development Framework, TWBC will give further consideration to how to manage and address problems of poor air quality. This could include consideration of seeking financial further contributions as appropriate for developments which, due to increased traffic or general activity, will impact on areas of poor air quality as identified through an air quality assessment.**

**A Summary of the direct measures for the A26 AQMA is shown in Table 4.**

**Direct Measures currently not considered but will be reviewed in more detail with the development of more specific targets for the updated air quality action plan**

TWBC will continue to monitor progress and best practice on these and other measures and work in partnership with KCC and other partners to investigate their potential for implementation to improve air quality and the environment in general.

**Low Emission Zone (LEZ) or Clear Zone**

A Low Emission Zone (LEZ) is a geographic zone defined for an area where vehicles of an acceptable emissions standard (currently Euro III) can enter and move around. The concept is held widely as a way of achieving air quality objectives within large urban area where economies of scale can be achieved with respect to set-up and operating costs.

Reducing the number of polluting vehicles might also be achieved by a range of other methods. For example, incentivisation mechanisms, partnerships to encourage lower emission vehicles or take-up of emission abatement technologies. Such as the Quality Bus Partnership and Freight Transport Partnerships.

Further consideration to the implementation of a full LEZ as found in London for the A26 AQMA is likely to be too expensive on grounds of cost and feasibility. However, alternatives will be explored further as specified above and the possibility of inclusion within the planning process.

A Clear Zone is a defined urban area, usually a City, which exploits new technologies and operational approaches to improve quality of life and support economic growth, whilst minimising the adverse impacts of its transport systems. The implementation of a Clear Zone along the A26 (AQMA) is dismissed on the grounds of cost-effectiveness and feasibility.

**Road User Charging or Workplace Parking Levy**

The Transport Act 2000 gave local authorities powers to introduce road user charging or workplace parking levy schemes. The revenue generated from such schemes would be used to improve local transport in the area.

The costs of introducing a road charging scheme can be offset by the revenue that is generated. Area wide charging is likely to be more costly to introduce than a designated route. The feasibility of area wide schemes is discussed in the South East Plan and it is unlikely that they will be introduced in the short term to achieve the air quality objective. Road User Charging is not being pursued by Kent County Council at this stage. Any consideration to potential schemes in Tunbridge Wells would need to be compatible with a regional scheme. Also, any scheme would need to be part of an overall package and promoted as such to highlight the range of benefits, countering any negative arguments.

Based on charging workers for parking at their place of work, the implementation of a workplace parking levy could reduce the number of private vehicles entering Tunbridge Wells. An area-wide parking levy could be investigated for the future but there are already organisations in Tunbridge Wells who are charging their staff and/or visitors to park in conjunction with promotion of alternatives as part of their Travel Plans. This is likely to grow both in terms of the level of charging and the organisations implementing it as more organisations develop Travel Plans and more are required through the planning process.

### Roadside Emissions Testing

Under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 (Statutory Instrument Number 1808) local authorities with AQMA are able to apply to the Secretary of State for Transport for the power to conduct roadside emissions testing of vehicles. The aim is to identify those vehicles that make a disproportionate contribution to emissions through poor maintenance with on-the-spot fines for those that fail. The scheme of a formal roadside emissions testing programme is not considered viable for stand-alone authorities and has therefore been dismissed as a possibility for inclusion in the current action plan.

However, as an authority consideration will be given to undertaking promotional road side emissions testing, with the aim to promote improvements to air quality and vehicle emissions.

### Idling Engine Emissions

The Road Traffic (Vehicle Emissions)(Fixed Penalty) (England) Regulations 2002 permit all local authorities in England to take action against drivers who leave their vehicle engines running unnecessarily when parked. The local authority can issue a fixed penalty (£20) to any driver blatantly running their engine unnecessarily and who refuses all reasonable requests to switch off.

Idling emissions from parked vehicles are not considered a significant issue in the AQMA to warrant introducing specific measures with necessary resource implications. The proposal has therefore been dismissed on the ground of cost-effectiveness.

### Freight Emissions

TWBC will work in partnership with KCC to encourage the sustainable distribution of freight and to reduce their impact on sensitive areas, such as the A26 AQMA. The appropriateness of any local freight strategy and signing with respect to the A26 will need to be reviewed as part of the revision of this action plan. Care must be taken that movement of freight to another route does not simply move the problem to another area. Further consideration to freight emissions will be made.

### 6.2 Proposed General Borough-wide Measures to Improve Air Quality

There are general measures that can be implemented by TWBC, or which TWBC can feed into, aimed at improving the air quality throughout the Borough. These are contained within adopted policy documents, or those currently under development and a number have funding secured. These will reduce background pollution concentrations and indirectly or directly will work towards achieving the Air Quality Objectives within the AQMA. Of those included below, a number have the potential to have a greater, impact on improving air quality through the ability to concentrate efforts in certain areas e.g. along the A26 AQMA. These measures will again be reviewed as part of the action plan review process.

#### 6.2.1 Improve Emissions Standards for Council Fleet and Public Service Vehicles

This measure would lead to reductions in emissions of $NO_X$ by improving emissions standards of vehicles in the public service sectors.

*Quality Bus Partnerships*

A Quality Bus Partnerships has been developed in Tunbridge Wells through the 2nd Local Transport Plan.

*Taxis*

With respect to taxi emissions, consideration could be given to setting minimum emissions standards for taxis through a review of the current licensing system.

*Council fleet and contractor vehicles*

The scope for improvements in the Council fleet and for contractor vehicles can be investigated through the Council Travel Plan and contract renewal/review. The Government is keen for local authorities to demonstrate their commitment to delivering cleaner air by leading by example and therefore the implementation of the Council Travel Plan and improving the Council's fleet emissions are key measures to take forward in the Plan.

**GM 1: TWBC will continue to work with KCC and other partners to deliver improvements in emissions standards, where practicable. This will include undertaking an emission awareness raising exercise by holding a voluntary roadside emissions testing day in the AQMA, by working together with the Kent Police and KCC.**

#### 6.2.2 Car Share and Car Club Schemes

Kentcarshare.com is a regional car sharing scheme for businesses and the public. **http://kentcarshare.com/.** TWBC is a Kentcarshare partner and encourage their staff to car share.

**GM 2: TWBC will continue to work with partners to actively support and promote the Kent-wide car share scheme, to encourage greater uptake.**

A Car Club provides its members with quick and easy access to a car for short term hire. Members can make use of Car Club vehicles as and when they need them. Car Clubs offer cost savings as members of a car club pay lower fixed costs than car owners. The annual membership typically costs less than a tax disc. There are often low user membership fees for those doing only one or two trips a month. After that you pay as you drive.

Car Clubs result in a reduction in car miles driven, with members walking or cycling more, using public transport more often or simply re-arranging how they make journeys and travelling less. Reducing car miles driven in turn reduces exhaust emissions and improves air quality.

Belonging to a car club makes it easier for people to meet their transport needs without running their own car, or in some cases without owning a second car. Research in the UK and overseas has found significant changes in travel behaviour once the link between car use and car ownership is broken. Car club members typically drive less and make more use of public transport, cycling and walking. In the UK, former car owners increase their use of non-car transport modes by 40% after joining a car club. Two-thirds of those who owned a car before joining saw their mileage fall, by an average of around 25%. Car club users typically give up owning a first or second car on joining; others defer purchasing one due to using the car club instead. The result being that each car club car typically replaces 6 private cars.

Within Kent, there is a Car Club operating in Maidstone town centre. The cars are located in the lay-by area immediately outside Sessions House and adjacent to the County Council Members car-park.

**GM 3: TWBC will explore the potential for operation of a Car Club in Tunbridge Wells.**

### 6.2.3 Land Use Planning

Section 3.8 summarises the main Tunbridge Wells Borough Local Plan (2006) policies, which will contribute to securing air quality improvements. Air quality considerations have also been incorporated within the emerging TWBC LDF.

**GM 4: All relevant TWBC Departments including Environmental Health, Planning Policy and Development Control will continue working closely together, to ensure that air quality is taken into account in the planning process when considering future land uses particularly with sites in or close to AQMAs or in areas marginally below air quality objectives. The specific commitment of each service needs to be developed and progressed.**

Land use planning has a key role in delivering sustainable transport systems within the area by considering and influencing the accessibility, location, scale, density, design and mix of development and encouraging alternative modes of travel. The Local Plan requires major development which would significantly increase travel to implement travel plans.

**GM 5: TWBC will continue to work together with developers, KCC and other partners to improve sustainable transport links serving new developments and secure travel plan agreements, where required by planning policy.**

TWBC currently uses the available Environmental Protection UK guidance for assessing air quality impacts of developments. The Kent & Medway Air Quality Partnership, of which TWBC is a member, are currently developing a County wide general planning guidance document for air quality and development control.
The Kent & Medway Air Quality Partnership have drafted a general Planning Guidance Document on Air Quality and Development, suitable for use by local authority officers and developers and provides general advice and also outline's possible s106 requirements and process. In Tunbridge Wells benefits will be sought on new development where increased traffic generation or general activity will impact on areas of poor air quality as identified through an air quality assessment.

**GM 6: TWBC will continue to develop through the Kent & Medway Air Quality Partnership a general planning guidance document to assist with air quality assessments of development proposals.**

### 6.2.4 Low Emissions Strategy

Low emission strategies (LES) provide a package of measures to help mitigate the transport impacts of developments. They aim to accelerate the uptake of low emission fuels and technologies in and around development site's. As such, they sit alongside and strengthen other transport emission mitigation options such travel planning, smarter choices and provision of public transport infrastructure.

Strategies are secured through a combination of planning conditions and legal obligations. They may incorporate policy measures and/or require financial investments in and contributions to the delivery of low emission transport projects and plans, including strategic monitoring and assessment activities.

LES guidance has been developed which explains the underlying principles of Low Emission Strategies and outlines how they can be deployed.

The LES Partnership supports adoption and implementation of Low Emission Strategies by local authorities. The partnership comprises a peer group of fifteen local authorities working together to support local implementation of LES and to demonstrate good practice; an advisory group encompassing experts and practitioners from central government, local government, consultancies, industry, academia and the NGO sector; and a management board.

TWBC are part of the Peer Review group and will work in partnership with other local authorities to develop the implementation of a low emissions strategy further, to aid in the improvements of local air quality and the dissemination of good practice.

**GM 7: TWBC will continue to actively participate in the Low Emissions Strategy Peer Review Group to develop local measures and a Low Emissions Strategy that will support improvements to local air quality.**

### 6.2.5 Local Air Quality Management and Pollution Control

**Air Quality Monitoring**

The air quality monitoring network in TWBC provides more accurate information and understanding of air quality within the Borough. Continuous monitoring stations are installed at two sites within the Borough, which monitor nitrogen dioxide ($NO_2$) (2 sites) and particulate ($PM_{10}$) (1 site) concentrations. A continuous $NO_2$ & $PM_{10}$ monitor was installed in the A26 AQMA in June 2005, which will provide more accurate information on pollutant concentrations in the AQMA as Action Plan measures are implemented. The continuous monitoring is supplemented by $NO_2$ passive diffusion tubes, a number of which are within the A26 AQMA.

**GM 8: TWBC will continue the commitment to undertake local air quality monitoring within the Borough to ensure a high standard of data is achieved to assess against air quality objectives**

**Promotion and Information Sharing**

It is important that information on air quality is provided in a clear and accessible way. The Council web site http://www.tunbridgewells.gov.uk/ provides details on air quality within the Borough and LAQM Review and Assessment Reports are available for viewing.

**GM 9: TWBC will make details of the Action Plan measures and annual progress reports available on its Website to ensure accessibility to the consultation and implementation process.**

In addition, a public information system is being set up by the Council at The Gateway (in the Town Centre), which could include provision of air quality information.

TWBC will actively promote information campaigns in the Borough and Innovative funding methods will be explored. This may include requiring developers to promote air quality improvements for occupants of their new developments.

**GM 10: TWBC will actively work towards providing information for the Community of Tunbridge Wells Borough, to assist in choosing and using alternative sustainable modes of transport and understand the impact of pollution and air quality.**

TWBC is a member of the Kent & Medway Air Quality Partnership (K&MAQP), which was formed in 1992. The members of the Partnership are shown below.


The major aims and objectives of the Partnership are:

- To facilitate a co-ordinated approach throughout Kent and Medway to the Local Air Quality Management (LAQM) obligations placed on local authorities under the Environment Act 1995.
- To compile, update and maintain an Emissions Inventory of air pollution sources in and around Kent, to assist with the LAQM process.
- To comment on and influence the economic, planning and transport policies within the county so that air quality issues are properly considered and dealt with.
- To gain an understanding of the health implications associated with poor air quality and the extent to which air quality threatens the health of Kent and Medway's communities.
- To work with national agencies, neighbouring authorities and European partners to promote an awareness of air quality issues and to participate in joint initiatives to further the knowledge and understanding of air quality issues.
- Liaise with DEFRA and government bodies to assist with the implementation of the National Air Quality Strategy.

The Partnership co-ordinates a county-wide air quality monitoring network, the Kent & Medway Air Quality Monitoring Network, which is funded in partnership with all the Kent local authorities. The K&MAQP represents the views of Kent at regional and national Air Quality Management Groups.

**GM 11: TWBC will continue to support and be a Member of the Kent and Medway Air Quality Partnership and Monitoring Network Group. Tunbridge Wells will also work together with the Kent & Medway Air Quality Partnership on air quality studies within the County to raise the profile of air quality in Tunbridge Wells and County-wide.**

**Pollution Control**

Prescribed Industrial Processes are regulated by TWBC and the Environment Agency under the Environmental Protection Act 1990 Part I A & B and subsequent Pollution

Prevention and Control Regulations 2000. There are 33 prescribed Part B/A2 Processes in Tunbridge Wells regulated by TWBC.

With regard to nuisance emissions from unregulated processes, Statutory Nuisance is enforced by Environmental Health under the Environmental Protection Act 1990 Part III. This controls smoke, dust, fumes or gas emissions from commercial and domestic premises which are causing a nuisance or are prejudicial to health. TWBC has an Enforcement Policy in place to ensure that, where the Local Authority has jurisdiction, effective measures are enforced against persons responsible.

**GM 12: TWBC will continue to proactively enforce industrial control and nuisance legislation to minimise pollutant emissions from these sources in Tunbridge Wells.**

### 6.2.6 Energy Management

**Domestic Energy Use**

TWBC are working in partnership with the Kent Energy Centre to promote increased energy efficiency in residential properties in the Borough. An annual Home Energy Survey is sent to residents with advisory leaflets on help available e.g. grant schemes. The energy savings can be calculated on a 12 monthly basis and includes the likely costs of improvement works to residents. TWBC also have a planned maintenance programme for Council housing stock to increase energy efficiency.

The Kent Energy Centre is co-ordinating the implementation of the Kent Health & Affordable Warmth Strategy (2001) on behalf of all Kent local authorities including TWBC, which aims to tackle fuel poverty and promote energy efficiency measures. There is a Comprehensive Energy Savings Programme which includes projects such as distribution of energy efficient light bulbs, as well as promoting uptake of grants for improving energy efficiency and insulation. All these measures will lead to improvements in domestic energy efficiency throughout the Borough.

Reporting will be in line with the National Indicator NI 186.

**Building Control**

Building Control can contribute to the development of policies for air quality improvement through the promotion of emission-reducing technologies in new developments and buildings.

The Building Control Service has a statutory responsibility to ensure that new building works within the Borough meet minimum technical standards in relation to health, safety, welfare and energy conservation, as prescribed under the Building Regulations 1991. The Legislation sets out substantive requirements and technical guidance to achieve minimum standards. This technical guidance is contained in Approved Documents giving general guidance as well as practical guidance about some of the ways of meeting the requirements of the Regulations. Approved Document L, “Conservation of Fuel and Power” requires reasonable provision to be made for the conservation of fuel and power in buildings by:

- limiting the heat loss through the fabric of the building;
- controlling the operation of the space heating and hot water systems;
- limiting the heat loss from hot water vessels and hot water service pipe work;

- limiting the heat loss from hot water pipes and hot air ducts used for space heating; and
- installing in buildings artificial lighting systems, which are designed and constructed, to use no more fuel and power than is reasonable in the circumstances and making reasonable provision for controlling such systems.

Part L of the Building Regulations identifies the legal minimum a development needs to meet in terms of energy efficiency in the UK. However, in Kent developers should additionally look to meet more stringent demands to satisfy the aims of the Kent and Medway Structure Plan (Policy SP1 and NR1) and the overarching aim of reducing $CO_2$ emissions, improving energy efficiency and increasing the proportion of energy generated from renewable sources. Many of these options have direct synergies with the improvement of local air quality

**GM 13: TWBC will continue to work together with the Kent Energy Centre and other partners to promote and implement energy efficiency measures in Tunbridge Wells**

### 6.2.7 Review of Action Plan

This current Action Plan was drafted in March 2008. Since then further air quality review and assessments have confirmed exceedences of the nitrogen dioxide air quality objective beyond the boundaries of the declared A26 AQMA.

There is therefore a need to extend the current AQMA to include the areas of further exceedance and review the Action Plan to ensure targets/measures remain valid, new measures are explored and appropriate and applicable cost benefit analysis is undertaken.

**GM 14: TWBC will review the Action Plan in consultation with all relevant parties to update the plan and include the changes in local air quality management and in light of the review and assessment results for air quality. The plan shall be reviewed by quarter 4, 2010/11.**

**A summary of the proposed general Borough-wide measures to improve air quality is provided in Table 5.**

## Table 4 Summary Table of Direct Action Plan Measures

| Action | Description | Organisation responsible | Date to be achieved by | Cost/ Funding Source | Air quality improvement in AQMAs | Other potential impacts | Performance Indicator |
|---|---|---|---|---|---|---|---|
| Direct Measures for the A26 AQMA | | | | | | | |
| DM1 | DEFRA air quality grant funding for action planning has been used to support the development of VISUM a transport model being produced by Jacobs on behalf of Tunbridge Wells and KCC. The model will be able to be used to inform the Action Plan and target measures more effectively and enable prioritisation of actions. The VISUM project is due to be completed in August 2010. | KCC/TWBC | 2010 | Overall cost of project high but funding from grant low. Funding already committed.<br><br>£20,000 (Air Quality Grant Funding) | N/A – indirect benefits from improved prioritisation of measures | Improved information on travel behaviour | Completion of VISUM model and being used. |
| DM2 | TWBC will work in partnership with KCC and Tonbridge & Malling Borough Council to implement any proposed traffic management improvements along the A26 | KCC/TWBC/ T&MBC | 2010/11 | LTP2 (Local Transport Plan) | High | Reduction in congestion; Reduction in noise; improved journey times | introduction of improvement schemes |
| DM3 | TWBC will continue to support the Quality Bus Partnership for Royal Tunbridge Wells and Southborough and will also consider the opportunities the QPB affords to improve vehicle emissions. | KCC/TWBC | 2010/11 | Local Transport Process | Moderate | Reduced congestion; improved journey times; safer roads; increased public transport use | introduction and implementation of Quality Bus partnership |
| DM4 | TWBC will continue to work in partnership with KCC to implement A26 (north) Bus Priority Measures | KCC/TWBC | 2010/11 | LTP2 | Moderate | Reduced congestion; improved journey times ; safer roads; increased public transport use | Implementation of the improvement schemes. Passenger numbers. |
| DM5 | TWBC will continue to work in partnership with Kent County Council to undertake an initial study, which will assist in establishing a strategy for determining the suitability of an enhanced public transport system for Royal Tunbridge Wells and Tonbridge at a strategic level. The aim of the Action Plan is to support an effective integrated transport strategy which forms part of the Transport | KCC/TWBC | Staged 2010/11 | Local Transport Process | moderate. | Reduced congestion; improved journey times; safer roads; increased public transport use; improved town centre environment | Implementation of the improvement schemes. Passenger numbers. |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | Strategy review. This will also include the potential to review any accelerated uptake of low emission busses. | | | | | | |

## Table 4 (Continued) Summary Table of Direct Action Plan Measures

| Action | Description | Organisation responsible | Date to be achieved by | Cost/ Funding Source | Air quality improvement in AQMAs | Other potential impacts | Performance Indicator |
|---|---|---|---|---|---|---|---|
| DM 6 | TWBC is working with KCC to review and develop a new Tunbridge Wells Transport Strategy. Amongst its key objectives the Strategy will also recognise air quality as one of its aims and objectives. Joint working initiatives and reviews will be established to enable action planning to be progressed to develop more specific targeted and cost benefit assessed actions for air quality. | TWBC/KCC | | Local Transport Process | N/A will assists in the prioritisation of actions. | | New Transport Strategy for Royal Tunbridge Wells in place. |
| DM 7 | TWBC as part of the Transport Strategy review will investigate possible partnership work with Kent County Council to assess the feasibility to review freight policies and possible identify a series of specific measures aimed at reducing HGV emissions. The feasibility of developing Low Emission Zones for HGV's will be explored further in conjunction with voluntary schemes. | KCC/TWBC | | Local Transport Process | High | Potential reduced congestion | |
| DM 8 | TWBC are enforcing local parking restrictions in Southborough and Tunbridge Wells (Mount Ephraim Road). | TWBC | Ongoing 2009 | Low<br><br>Existing budgets | Low | Potential reduced congestion | |
| DM9 | TWBC will continue to support and work with KCC to increase uptake and implementation of School and Workplace Travel Plans; particularly where likely to impact on the A26 AQMA | KCC/TWBC | 2010/11 | LTP2 | Moderate | Potential improvement in journey time, through reduced congestion and increased walking, cycling and public transport uptake | Number of new travel plans in place. |
| DM10 | TWBC will investigate the feasibility of developing and implementing a Borough Council Travel Plan | TWBC | | To be identified | Low | | Adoption of Council Travel plan; progress with targets. |
| DM11 | TWBC will work in partnership with Kent County Council to review and if appropriate support improvements to Tunbridge Wells and Southborough Local Cycle Network. A cycling | KCC/TWBC | 2010/11 | LTP2 | Low | Reduced congestion; health benefits; better quality environment | Number miles new cycle lanes/ routes. |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | strategy is being proposed as part of the Tunbridge Wells Transport Strategy. | | | | | | |
| DM12 | During the preparation of the Local Development Framework, TWBC will give further consideration to how to manage and address problems of poor air quality. This could include consideration of seeking financial further contributions as appropriate for developments which, due to increased traffic or general activity, will impact on areas of poor air quality as identified through an air quality assessment. | TWBC | Ongoing, 2010 | Low<br><br>Existing budgets | Moderate | Socio-economic implications of increased costs for development | Contributions secured for air quality through S106 |

The costs are provided as: 'Low' (up to £100,000); 'Moderate' (between £100,000 – £1 million); and 'High' (greater than £1 million). The air quality improvements are provided as: 'Low' (<0.2µg/$m^3$); 'Moderate' (between 0.2 – 1 µg/$m^3$); and, 'High' (greater that 1 µg/$m^3$). The timescales are provided as: short term (1-2 years), medium term (2-5 years), long term (>5 years)

## Table 5 Summary Table of General Action Plan Measures

| Action | Description | Organisation responsible | Date to be achieved by | Cost/ Funding Source | Air quality improvement in AQMAs | Other potential impacts | Performance Indicator |
|---|---|---|---|---|---|---|---|
| General Borough-wide Measures | | | | | | | |
| GM1 | TWBC will continue to work with KCC and other partners to deliver improvements in emissions standards, where practicable. This will include undertaking an emission awareness raising exercise by holding a voluntary roadside emissions testing day in the AQMA, by working together with the Kent Police and KCC. | TWBC/KCC/ Public transport operators | Ongoing | TBC | Low - moderate | Socio-economic implications of increased costs to transport operators, contractors and TWBC. | Number of new/improved vehicles within fleets |
| GM2 | TWBC will continue to work with partners to actively support and promote the Kent-wide car share scheme, to encourage greater uptake. | TWBC/KCC | Ongoing | Low TWBC existing budgets | Low | Reduced congestion | Number new joiners to share schemes |
| GM3 | TWBC will explore the potential for operation of a Car Club in Tunbridge Wells. | TWBC | 2008 | Low TWBC existing budgets | Low | Reduced congestion | Introduction of Car Club |
| GM4 | All relevant TWBC Departments, including Environmental Health, Planning Policy and Development Control, will continue working closely together to ensure that air quality is taken into account in the planning process when considering future land uses, particularly with sites in or close to AQMAs or in areas marginally below air quality objectives. The specific commitment of each service needs to be developed and progressed. | TWBC | Ongoing | Low TWBC existing budgets | Low | Health benefits for residents in new development proposals | Number of planning applications with air quality conditions/ assessments |
| GM5 | TWBC will continue to work together with developers, KCC and other partners to improve sustainable transport links serving new developments and secure travel plan agreements, where required by policy. | TWBC/KCC/developers/transport providers | Ongoing | Low TWBC existing budgets | Low | Reduced congestion | Number of new travel plans |
| GM6 | TWBC will continue to develop, through the Kent & Medway Air Quality Partnership, a general planning guidance document to assist with air quality assessments of development proposals. | TWBC | 2007/8 | Low TWBC existing budgets | Low | Reduction in nuisance complaints | Completion of planning guidance |
| GM7 | TWBC will continue to actively participate in the Low Emissions Strategy Peer Review Group to develop local measures and a Low Emissions Strategy that will support improvements to local air quality. | TWBC | Ongoing | DEFRA grant funding £10K 2009/10 plus use of existing resources | Moderate | Links with climate change and greenhouse gas emissions. | Low emissions strategy in use as part of planning process |

## Table 5 (Continued) Summary Table of General Action Plan Measures

| Action | Description | Organisation responsible | Date to be achieved by | Cost/ Funding Source | Air quality improvement in AQMAs | Other potential impacts | Performance Indicator |
|---|---|---|---|---|---|---|---|
| GM8 | TWBC will continue the commitment to undertake local air quality monitoring within the Borough to ensure a high standard of data is achieved to assess against air quality objectives. | TWBC | Ongoing | Low TWBC Existing budgets | Low | Enable effective monitoring and evaluation of progress | Number of monitoring sites % data capture |
| GM9 | TWBC will make details of the Action Plan measures and annual progress reports available on its Website to ensure accessibility to the consultation and implementation process. | TWBC | Ongoing | Low TWBC Existing budgets | Low | Improve awareness | Availability of recently published reports on the Website |
| GM10 | TWBC will actively work towards providing information for the Community of Tunbridge Wells Borough, to assist in choosing and using alternative sustainable modes of transport and understand the impact of pollution and air quality. | TWBC | Ongoing | Low TWBC existing budget | Low | Improve awareness | One promotional activity per year and two information updates in the Borough's information paper undertaken |
| GM11 | TWBC will continue to support and be a Member of the Kent and Medway Air Quality Partnership and Monitoring Network Group. Tunbridge Wells will also work together with the Kent & Medway Air Quality Partnership on air quality studies within the County to raise the profile of air quality in Tunbridge Wells and County-wide. | TWBC | Ongoing | Low TWBC Existing budgets | Low | Improve awareness | Membership, continuation of network and and feedback to Tunbridge Wells Borough. |
| GM12 | TWBC will continue to proactively enforce industrial control and nuisance legislation to minimise pollutant emissions from these sources in Tunbridge Wells. | TWBC | Ongoing | Low TWBC Existing budgets | Low | Reduction in nuisance complaints | BVPI for upgrade of permitted industrial processes |
| GM13 | TWBC will continue to work together with the Kent Energy Centre and other partners to promote and implement energy efficiency measures in Tunbridge Wells. | TWBC | Ongoing | Low TWBC Existing budgets | Low | Improve energy efficiency; reduce costs | in line with NI 186 |
| GM14 | TWBC will review the Action Plan in consultation with all relevant parties to update the plan and include the changes in local air quality management and in light of the review and assessment results for air quality. The plan shall be reviewed in quarter 4, 2010/11 | TWBC | | | Moderate | Improved awareness and links with partners strengthened | Action Plan reviewed and updated. |

The costs are provided as: 'Low' (up to £100,000); 'Moderate' (between £100,000 – £1 million); and 'High' (greater than £1 million).
The air quality improvements are provided as: 'Low' (<0.2µg/$m^3$); 'Moderate' (between 0.2 – 1 µg/$m^3$); and, 'High' (greater that 1 µg/$m^3$).
The timescales are provided as: short term (1-2 years), medium term (2-5 years), long term (>5 years)

# 7 IMPLEMENTATION AND MONITORING

TWBC will work jointly on the action plan measures with its partners including KCC, transport operators, schools and local businesses. To secure the necessary air quality improvements there must be involvement by all local stakeholders and TWBC will actively work to encourage community participation in the process.

The implementation and effectiveness of the Action Plan will be carefully monitored through monitoring of nitrogen dioxide at relevant receptor locations within the AQMA. In addition, traffic flow changes on the key roads will also be assessed through the review and assessment process, and the uptake of local measures such as Travel Plans will be monitored. Indicators have been provided for measures to be undertaken by the Council to monitor progress annually.

Targets and indicators have also been established through the 2nd Local Transport Plan. Below are those specific to the air quality shared priority, although other indictors relating to congestion and accessibility shared priorities will also be of relevance.

- Air quality (Shared priority) Air quality target related to traffic
  Target: 5 or less AQMAs by 2010 based on 11 declarations

Trajectory shows intermediate indicator relating to cumulative traffic flows (AADT) in all 11 AQMAs.

There will be regular review and assessment of the action plan proposals to evaluate progress and this will be reported annually, including through LAQM and 2nd Local Transport Plan progress reports.

## 8 DEFRA ACTION PLANNING REQUIREMENTS COMPLIANCE CHECKLIST

| WORK AREA | CONSIDERED/INCLUDED | LOCATION IN ACTION PLAN/ COMMENTS |
|---|---|---|
| **Adherence to Guidelines and Consideration of Policies** | | |
| Statutory Consultees consulted? | | |
| Consulted with other Local Authorities and internal departments? | | |
| Statement of Pollutant causing AQMA? | | |
| Principle sources of pollutants identified? | | |
| Have other local authorities' plans and policies been considered? | | |
| Options timetable included? | | |
| Have options been costed? | | |
| Have the impacts been assessed? | | |
| **Checklist of Measures** | | |
| Have options been considered? | | |
| How many options considered? | | |
| Transport impacts assessed? | | |
| Have air quality impacts been assessed modelled or measured? | | |
| Have socio-economic impacts been assessed? | | |
| Have other environmental impacts been assessed? | | |
| Have costs been considered? | | |
| **Appropriateness and Proportionality** | | |
| Do measures seem appropriate to the problem? | | |
| Have the measures been assessed? | | |
| Are the measures likely to succeed? | | |
| Have wider impacts been assessed? | | |
| Was the costing method appropriate? | | |
| Is it likely that the AQMA objective will be met? | | |
| Do the chosen options comply with Government Policies? | | |
| **Implementation** | | |
| Are measures realistic? | | |
| Have responsibilities been assigned to the relevant party? | | |
| Does the assigned party have the necessary powers? | | |
| Is the financing secure and identify who pays? | | |

## 9 GLOSSARY OF TERMS

| Abbreviation | Full name |
|---|---|
| AQMA | Air Quality Management Area |
| AQS | Air Quality Strategy |
| BAT | Best Available Technology |
| DEFRA | Department for Environment, Food and Rural Affairs |
| DfT | Department for Transport |
| DOE | Department of the Environment |
| HDV | Heavy Duty Vehicles |
| HGV | Heavy Goods vehicles |
| KCC | Kent County Council |
| LAQM | Local Air Quality Management |
| LES | Low Emissions Strategy |
| LDD | Local Development Documents |
| LDF | Local Development Framework |
| LDV | Light Duty Vehicles |
| LEZ | Low Emission Zone |
| LSP | Local Strategic Partnership |
| LTP | Local Transport Plan |
| NAQS | National Air Quality Strategy |
| $NO_2$ | Nitrogen dioxide |
| NOx | Oxides of nitrogen |
| NSCA | National Society for Clean Air |
| $PM_{10}$ | Fine particle matter less than 10µm diameter |
| ppb | Parts per billion |
| $SO_2$ | Sulphur dioxide |
| SPD | Supplementary Planning Document |
| TWBC | Tunbridge Wells Borough Council |
| $\mu g/m^3$ | Micrograms per cubic metre |
| UTMC | Urban Traffic Management Control |
| VMS | Variable Message Signage |

## 10 REFERENCES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DETR (2000) The Air Quality Regulations 2000, The Stationery Office

DOE (1997) The United Kingdom Nation Air Quality Strategy, The Stationery Office

EPUK Environmental Protection UK Development Control – Planning for Air Quality 2006

Kent County Council (2006) Local Transport Plan 2006– 2011

NSCA (2000) Air Quality Action Plans

NSCA (2001) Air Quality: Planning for Action

SEERA (2006) Draft South East Plan (Regional Spatial Strategy)

Tunbridge Wells Borough Council (2006) Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council (2003) Tunbridge Wells's Borough Transport Strategy

Tunbridge Wells Borough Council (2007) Tunbridge Wells Strategic Plan 2007- 2010

Tunbridge Wells Borough Council (2005) Environment Strategy for Tunbridge Wells

Tunbridge Wells Local Strategic Partnership (2006) Sustainable Community Plan for Tunbridge Wells Borough 2006 - 2011

## APPENDIX I CONSULTATION OUTCOME

### Summary of Comments from Consultees regarding the draft Air Quality Action Plan March 2008

During the consultation period from June 08 to November 08, 19 public responses were received, 1 from the Southborough Town Council and 2 from Kent County Council and 2 from internal departments.

Some of the responses were brief such as provide better bus service others were much more detailed, highlighting a variety of issues. One response related to a planning application that did not have any connection with the Air Quality Management Area and the Action Plan.

See below a summary of the responses received; -

### Responses from the general public:

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| The Action Plan should not over-sell the potential benefits of park and ride. The draft Action Plan suggests that P&R is likely to result in improved air quality in the Borough. "Unfortunately, most of the research on the effectiveness of P&R suggests otherwise." A study undertaken by consultants WS Atkins (commissioned by the Department of Environment Transport and the Regions) concluded that "Only very limited benefits from Park & Ride emerge in terms of less car-km being driven". This conclusion has been backed up by independent research undertaken by Dr. Graham Parkhurst of the ESRC Transport Studies Unit, and Picket & Gray of the Transport Research Laboratory.<br><br>• Remove the claim in Table 4 that P&R will lead to a 'Moderate' improvement in air quality. Replace with 'Low' or a statement saying the impact will be determined at a future date. | The Action Plan needs to do more to focus on HGV emissions.<br><br>Astonishing in relation to the A26 AQMA HDV's contribute to halve the NOx concentrations, even thought the represent only around 5%-7% of the total vehicle fleet, (page 8 of report).<br><br>The Action Plan needs to focus more on these vehicles; at present only very few measures seem to target HDV's.<br><br>The Plan needs a specific series of measures aimed at targeting HDV emissions.<br><br>The traffic survey needs to closely examine HDV movements.<br><br>Encourage conversion/replacement of HDV's to lower emission vehicles. This also applies to Buses.<br><br>Review widening of the low and narrow railway bridge on North Farm Lane. |
| It seems there are 3 main ways of improving air quality, these include reduce traffic volumes or more accurately reducing vehicle-km driven; improve traffic flow; reduce emissions per vehicle. The author of this report Mr Peter Tavern has given permission to include his response with the Committee/Cabinet reports. | The introduction of Low Emissions Zones (LEZ) is dismissed to easily. The cost would probably be far cheaper than that incurred for developing a single Park and Ride site. |
| Poor bus service, only certain routes appear | "Actively promote the use of vehicles in the |

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| better, others not enough buses limited frequency, not on time and journey times too long. "If you had a better service more people would use the buses." | £35 tax disc category, their emissions are lower."<br><br>"Provide these type of vehicles with parking privileges for example of 30 minutes throughout the Town in any locations that disable people are allowed to park." |
| Promote electric buses and recharge at key fare stages. Promote LPG buses.<br><br>"Significantly increase the number of buses especially smaller, electric or LPG by actually spending parking charges and fines on public transport." | "The action plan is completely inadequate for the task, air pollution will continue to deteriorate as developments increase and the population of the area rises." |
| Provide a more affordable, reliable, including real time information at bus stops, frequent and comfortable bus service. "Compared to other regions in this area buses are expensive." | "Introduce a Low Emission Zone along the A26." "This should help cyclists as well to prevent them breathing in the excess pollution levels." |
| Instead of Companies providing subsidised car parking, provide their staff with discounted bus tickets. | Actively promote the dualing of the A21 x2.<br><br>Build a bypass x2. |
| Provide a more reliable and frequent bus service. "The service between Tonbridge and Tunbridge Wells is very poor i.e via Southborough." | Actively manage road works on the A26, provide incentives to shorten time taken and charge contractors for the disruption and pollution caused. |
| "Buying your ticket on the bus also delays the service more. Why not provide a system of buying tickets in advance from shops and include multiple tickets books, should be available at discount to assist with the very high cost of bus tickets." | Improve traffic flow at Yew Tree Rd and Speldhurst Rd, replace traffic lights with mini roundabouts, i.e. see Riverhead near Sevenoaks. Block up the exit from the service road next to Majestic's to prevent queue jumping. |
| Ban diesels not fitted with particulate trap, especially on buses. | Make specific junction improvements to A264Mount Ephraim/A26London Rd and Church Rd/London Rd. |
| "Currently most buses are no longer fit for service, produce excessive fumes and black smoke and are not adequately maintained. A modern clean fleet should be introduced to encourage people use them." | Council needs to look at the vehicles used for council services and ensure that these are part of a green fleet, to set an example. |
| Tax or ban HGV's who use the road at peak times. | "A car club sounds an excellent idea." "I would welcome the opportunity to join one." x2 responses. |
| Tackle illegal obstructions, by not permitting deliveries blocking roads between certain hours and provide legal stopping places that do not cause an obstruction. | "Yes, Yes to cycle lanes." "Where are the cycle lane improvements?" |
| "If you are serious about bus friendly policies, then planning policy should dictate that nothing is to be built close to the A26 north of the Yew Tree Road junction on the east side. The Chinese restaurant should be demolished and the forecourts and verges | If traffic lights are maintained at Yew Tree Rd and Spelthurst Rd, the fixed timing cycle should be altered at off peak times so lights change according to demand. |

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| taken to provide either a left filter lane to Yew Tree Road or a bus lane on the approach to the traffic lights for as long as possible." | |

**Response from Southborough Town Council:**

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| Q 1: Has the traffic survey been carried out. | A 1: This forms part of the transport study and the development of the multimodal traffic module – VISUM. The survey has now commenced Sept 09. |
| Q 2: In relation to DM 2 Why aren't recent studies on this junction taken into consideration in this report? Multiple, prioritised crossings actually increase pollution and congestion. | A 2: Traffic management is KCC responsibility, the Council comment on any proposals as submitted to the Joint Transport Board JTB. Advised has been given that with certain schemes an assessment as to the impact on air quality would be required. |
| In relation to DM 3 bus should switch to LPG. | |
| In relation to DM 4 There is no room for bus lanes on London Road, Southborough - the road is not wide enough to implement this strategy. | DM 5: Good idea - but where?<br>DM 6: Support<br>DM 7-10: Support<br>GM 1–12 Support |
| Q 3: Why is road side emission testing not viable? | A 3: Not considered due to cost benefit. In the main only undertaken by the larger authorities, i.e. unitary, metropolitan. Significant cost implications for limited gain. However, such actions could be considered in the future. |

**Response from KCC and internal departments:**

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| KCC - No mention of rail links in the main action plan. Could more be made of the improvements to Tonbridge and using the line as an alternative to the A26? | KCC - It is good to see references to the contributions which sustainable travel and transport can make to delivering AQMA targets. |
| In relation to energy efficiency measures in Tunbridge Wells, we will be reporting on $CO_2$ savings/levels as specified by NI 186. | KCC – We would be very keen to talk through options with regards to setting up a Car Club. |
| Should the Borough Council resolve to seek developer contributions for air quality initiatives through S106 Agreements, the policy/strategic context set out in Chapter 3 of the Action Plan would provide the basis upon which a Supplementary Planning Document, setting out how new development should achieve the policy objectives for air quality, could be developed. In principle, it would be acceptable for the SPD to require financial contributions as a means of meeting these objectives. | |