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TONBRIDGE & MALLING BOROUGH COUNCIL

EXECUTIVE SERVICES

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NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.

Contact: Democratic Services
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25 September 2020

To: MEMBERS OF THE STREET SCENE AND ENVIRONMENT SERVICES ADVISORY BOARD
(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Street Scene and Environment Services Advisory Board to be held online via Microsoft Teams on Monday, 5th October, 2020 commencing at 7.30 pm. Information on how to observe the meeting will be published on the Council's website.

Yours faithfully

JULIE BEILBY

Chief Executive

A G E N D A

PART 1 - PUBLIC

11. Urgent Items 233 - 234

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

Matters for consideration in Private

12. Exclusion of Press and Public 235 - 236

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

PART 2 - PRIVATE

13. Urgent Items 237 - 238

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

MEMBERSHIP

Cllr M O Davis (Chairman)
Cllr Mrs S Bell (Vice-Chairman)

Cllr G C Bridge
Cllr D J Cooper
Cllr D A S Davis
Cllr S M Hammond
Cllr M A J Hood
Cllr F A Hoskins
Cllr A P J Keeley
Cllr D Keers
Cllr A Kennedy
Cllr Mrs C B Langridge
Cllr R V Roud
Cllr J L Sergison
Cllr T B Shaw
Cllr Miss G E Thomas

Apologies for absence

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Declarations of interest

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TONBRIDGE AND MALLING BOROUGH COUNCIL

STREET SCENE AND ENVIRONMENT SERVICES ADVISORY BOARD

Thursday, 5th March, 2020

Present: Cllr M O Davis (Chairman), Cllr Mrs S Bell (Vice-Chairman), Cllr G C Bridge, Cllr D A S Davis, Cllr M A J Hood, Cllr F A Hoskins, Cllr D Keers, Cllr R V Roud, Cllr T B Shaw and Cllr Miss G E Thomas

Councillors R P Betts, M D Boughton, M A Coffin, Mrs T Dean, N J Heslop, D Lettington, B J Luker, W E Palmer, M R Rhodes, N G Stapleton and M Taylor were also present pursuant to Council Procedure Rule No 15.21.

Apologies for absence were received from Councillors D J Cooper, Mrs C B Langridge and J L Sergison

PART 1 - PUBLIC

SSE 20/6 DECLARATIONS OF INTEREST

In the interest of transparency, Councillor M Davis reminded Members that his firm was a major purchaser of season tickets in Tonbridge and indicated that if, during consideration of the item on Car Parking Fees and Charges – Outcome of Public Consultation, it became apparent that he had an Other Significant Interest he would declare it and withdraw from the meeting in accordance with Council and Committee Procedure Rule No. 5.31.

SSE 20/7 MINUTES

RESOLVED: That the notes of the meeting of the Street Scene and Environment Services Advisory Board held on 11 February 2020 be approved as a correct record and signed by the Chairman.

MATTERS FOR RECOMMENDATION TO THE CABINET

SSE 20/8 CAR PARKING FEES AND CHARGES - OUTCOME OF PUBLIC CONSULTATION

The joint report of the Director of Street Scene, Leisure and Technical Services and the Director of Finance and Transformation set out details of the objections and comments received during the statutory consultation period in respect of proposed off-street parking charges for existing car parks in Tonbridge, West Malling, Borough Green, Blue Bell Hill and the Council's Country Parks at Leybourne Lakes and Haysden. In response to a request from Members it was confirmed that a concession could be made for the diabetic screening unit/clinic at West Malling Car Park.

RECOMMENDED: That the following actions be progressed prior to the proposed parking charges, as outlined in the report, coming into effect on 5 April 2020:-

(1) the objections to the proposed changes to the off-street parking charges, as detailed in the report, be set aside; and

(2) the appropriate Traffic Regulation Order be made to facilitate the variation of the off-street parking charges.

***Referred to Cabinet**

SSE 20/9 AIR QUALITY MANAGEMENT AREA REVIEW

Decision Notice D200026MEM

The report of the Director of Planning, Housing and Environmental Health set out details of the periodic statutory review of Air Quality Management Areas (AQMAs) within the Borough and outlined a proposed update of the Council's Air Quality Action Plan (AQAP).

RECOMMENDED: That the issue of revocation and amendment orders as required by DEFRA for the

- revocation of AQMA 1 relating to Daily PM^{10} only;
- revocation of the whole of AQMA 2 at Ditton; and
- amendments to the areas of AQMAs 5, 6, and 7 at Aylesford, Larkfield and Borough Green respectively,

as detailed in Section 1.3 of the report, be endorsed.

[In accordance with Council and Committee Procedure Rule No. 8.6, Councillor T Shaw requested that it be recorded in the minutes that he had voted against the amendments to the areas of AQMAs 5, 6 and 7.]

MATTERS SUBMITTED FOR INFORMATION

SSE 20/10 PRIORY WOOD, TONBRIDGE - LANDFILL GAS INVESTIGATION UPDATE

The report of the Director of Planning, Housing and Environmental Health provided an update on the year long detailed landfill gas investigation which had commenced in August 2019 at the Priory Wood site in Tonbridge.

SSE 20/11 EXCLUSION OF PRESS AND PUBLIC

There were no items considered in private.

The meeting ended at 9.05 pm

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TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Director of Street Scene, Leisure & Technical Services

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 STREET SCENE, WASTE AND PARKING - RESPONSE TO COVID 19

Summary
This report updates Members on progress with the themes/activities identified within the Street Scene, Waste and Parking section of the approved First Year Addendum to the Council's Corporate Strategy. This includes updates within Street Scene and Waste on service performance, the roll out of the new service arrangements to flats/communal areas, the reintroduction of the weekend bulky collection service, subscriptions for garden waste and the transfer of public conveniences to Parish Councils. The report also updates on timescales for the introduction of new car parking charges, consultation on parking charges in Aylesford and Martin Square car parks, and the potential introduction of digital payment options to car parks.

1.1 Introduction

1.1.1 At its meeting on the 3 June 2020, Cabinet approved a First Year Addendum to the Corporate Strategy in response to the Covid-19 pandemic. The Addendum identified a number of themes/activities and, within each, identified specific service areas to be reviewed, with an aim to Re-orientate and then Recover these services. Cabinet also agreed that progress with these themes/activities be monitored through updates to relevant Advisory Boards and Committees.

1.1.2 Included within the Addendum are themes/activities related to Street Scene and Waste, and Parking Services. Within the Review section the following service areas are identified:

Street Scene and Waste

- Review timescale for reintroducing weekend bulky collection service and subscriptions for garden waste including direct debit.
- Review any implications of Covid-19 for the transfer of public conveniences to parish councils.

Parking

- Review and evaluate timescales for new charges, and the forthcoming consultation on parking charges in Aylesford and Martin Square.
- Evaluate the potential of capital investments (such as contactless payments and other digital payment options) to car parks.

1.1.3 Further to the above the following were also identified under the Re-orientation section:

Street Scene and Waste

- In liaison with the contractor, Urbaser, undertake risk assessments and gear back up for complete reintroduction of core services.
- Refocus resources on the transfer process.

Parking

- Review timescales where required and come to an agreed approach on capital investments.

1.2 Street Scene and Waste

1.2.1 Core Service Provision – Members will be aware of the implications that Covid-19 has had on the delivery of core services within the Council's Waste Contract. Through lockdown this was most evident with around 50% of contractor staff either on sick leave, self-isolating or "shielding'' at some points. This was combined with significantly increased tonnages across all waste streams, a situation that was replicated across Kent and nationwide. As such, service provision was prioritised to focus on key kerbside collections and resulted in a number of other service suspensions including garden waste collections, new garden waste subscriptions, bulky collections (charged doorstep collection service) and the Saturday Freighter Service. In addition resources were also temporarily directed away from Street Cleansing.

1.2.2 As the Covid-19 staffing pressures eased for Urbaser all services have now been reintroduced with the exception of the Saturday Freighter Service. It is also worthy of note that tonnages remain high with the latest figures from KCC showing significant increases in all collection streams when compare with tonnages collected prior to the impacts of Covid-19 being felt:

Black bin waste	up 34%
Glass, cans & plastics	up 53%
Paper & card	up 68%
Food waste	up 24%

1.2.3 Reintroduction of Garden Waste Subscriptions – The ability for residents to sign up to the paid for garden waste collection service was suspended from 25 March to 7 June This reflected the fact that the service was also suspended and the administration and delivery of new bins would have placed additional pressure on the Council and its Contractor at a time when other service areas where being prioritised. Following the recommencement of the service new subscriptions also opened again in May. Since that date new subscriptions have been steady with around 350 in July and 300 in August. Overall the total number of households subscribed is 27,475 representing a 50% take up across the borough to date.

1.2.4 The vast majority of subscriptions are shortly due for renewal and Waste Services are working in liaison with the Council's Customer Services to ensure appropriate resources are in place to administer this. Whilst it is envisaged that the majority of renewals will be automated, it is still anticipated that a percentage will require assistance in this process. The Council's IT Services are also progressing the option of Direct Debit and it is hoped that this will be completed in time to allow residents to take up this option on renewal.

1.2.5 Reintroduction of Weekend Bulky Waste Collection (Saturday Freighter Service) – As highlighted above the weekend service is still currently suspended, in both Tonbridge and Malling and Tunbridge Wells. Whilst its suspension was in part related to staffing resources, the other key consideration was the implications of social distancing and the safety and welfare of those residents using the service and the staff operating them. This was also an issue for Kent County Council in relation to the Household Waste Recycling Centres and whilst these have reopened, attendance is controlled through a strict pre-booking system that still remains in place. The reopening of these KCC facilities does provide the opportunity for TMBC residents to dispose of bulky waste that they may have otherwise taken to our weekend service. The operational arrangements for our weekend service are currently being reviewed by Urbaser's health and safety team and a risk assessment is due to be presented to the Partnership. It is proposed that consideration will not be given to the reintroduction of this service until completion of the assessment and reassurance that appropriate measures can be implemented to ensure the safety of those using and operating it.

1.2.6 New Service Arrangements to Flats and Communal Properties – Members will be aware of the outstanding project to introduce new recycling opportunities to communal properties and flats. This project has been delayed for a number of reasons in the past, including Covid-19, though we are aware that Members and residents are keen to see this progress. Residual concerns still remain regarding performance issues with Urbaser and an Action Plan is currently in place and being monitored. At this time it is still felt that the Council needs to see reliable and sustained performance levels before this new project is commenced, and there also remains a concern regarding a potential second-wave of Covid-19 that could impact on staffing resources and service provision. It is, however, felt that a commitment needs to be made to the project and it is, therefore, proposed that a trial/pilot project be undertaken in a designated area. This will give the Council the

opportunity to review the implementation on a smaller scale and refine before roll-out across the borough as a whole. It is proposed that the trial/pilot takes place in January 2021 in a designated area of Tonbridge. It is then proposed to roll out across the borough in March/April/May 2021.

1.2.7 Bring Bank/Recycling Sites – The reduction of bring bank/recycling sites across the borough is also pending and Members have previously approved the commencement of the project following completion of the roll-out of new services to flat/communal properties. The project will see the reduction of sites to 10 key strategic locations and could be undertaken on a phased basis. It is, therefore, proposed that the principal of commencing this project now be considered, with the removal of any sites prior to the flat/communal roll out being subject to liaison with the relevant local Members and Cabinet Member. Alternatively, approval could be given to progress this project on the understanding that residents (including those in flat and communal properties) will always have the opportunity to recycle at one of the 10 retained strategic sites.

1.2.8 Transfer of Public Conveniences – Members of this Board will recall that the transfer of public conveniences to Parish /Town Councils has been approved by Cabinet following recommendations considered by this Board with an estimated annual saving of £70,000 contributing to the Savings and Transformation Strategy. The timescale agreed prior to the pandemic was 1st April 2021 and it is felt that this timescale can still be achieved. The transfer relies on the legal agreements being actioned and improvements made to the existing facilities so they are in a fit state to transfer. An update report on progress will be presented to the next meeting of this Board.

1.3 Parking

1.3.1 The timescale for the introduction of the new car parking charges previously considered by this Board are reported separately in these papers. The separate report also considers the potential timescale for consultation on the introduction of car parking charges to Martin Square and Aylesford car parks.

1.3.2 In terms of the potential introduction of contactless payments and other digital payment options an Officer Group including representatives from IT and Financial Services has been established to consider a range of options together with any capital and revenue cost implications. Options under consideration include the conversion of the existing machines to accept contactless payments, the possible phasing out of payment by cash, the retention and improvement to the phone based system and the potential development of an app for the authority. Members will be interested to note that due to the influence of the pandemic 30% of all payments are currently made by use of the existing Parkmobile telephone system. It is the intention to report back to the next meeting of this Board on progress.

1.4 Legal Implications

1.4.1 The statutory framework governing the response to the pandemic is evolving and changing on a frequent basis, both in the restrictions placed upon individuals and upon the responsibility of local authorities. Specific proposals or changes brought forward following a review of the services will be assessed at the appropriate time in liaison with Legal Services to ensure they are lawful.

1.5 Financial and Value for Money Considerations

1.5.1 Management Team and endorsed by Cabinet on 19 May 2020 imposed an 'essential spend only' policy for 2020/21 in order to preserve resources and set a 'savings target' of at least £500,000 to be delivered as a result of this policy.

1.5.2 An earmarked reorientation/post emergency reserve of £200,000 has been established to assist the Council in some of its recovery activity.

1.6 Risk Assessment

1.6.1 The departmental operational risk assessment has been updated substantially and is being revised on an ongoing basis as government guidance on Covid-19 changes.

1.7 Equality Impact Assessment

1.7.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.8 Policy Considerations

1.8.1 Business Continuity/Resilience, Health and Safety and Community

1.9 Recommendations

1.9.1 It is **RECOMMENDED TO CABINET** that

i) the update to the approved First Year Addendum to the Council's Corporate Strategy be noted;

ii) the reintroduction of the Saturday Freighter Service will be considered following the completion of a full health and safety assessment and reassurance that appropriate measures can be implemented to ensure the safety of those using and operating it;

iii) the trial/pilot roll-out to flats and communal properties for the new service takes place in January 2021 in a designated area of Tonbridge, with the intention to roll out across the rest of the borough in March/April/May 2021, and

iv) the reduction of bring bank sites across the borough commences prior to the new service provision being rolled out to the flats and communal properties.

The Director of Street Scene, Leisure & Technical Services confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers:

Nil

contact: Darren Lanes
Andy Edwards

Robert Styles
Director of Street Scene, Leisure & Technical Services

TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Chief Executive

Part 1- Public

Matters for Recommendation to Cabinet - Key Decision

1 TO PROVIDE AN UPDATE ON THE CLIMATE CHANGE STRATEGY IN LIGHT OF THE CONSULTATION RESPONSE

1.1 Background

1.1.1 A Draft Climate Change Strategy and Draft Year 1 Action Plan was approved by this Committee on 11 February 2020. It was recommended that these drafts were available for public consultation from 1 March – 30 May 2020.

1.1.2 To publicise the consultation, a news release was undertaken along with social media posts, there was a dedicated link direct from the Council's home page in addition to targeted emails to partners and stakeholders. As everyone will be aware, from March onwards the global pandemic has dominated focus for the Council and the wider community. With this in mind, the consultation period was extended until the end of June 2020 and there were a number of residents and Parish Councils who took advantage of this extension.

1.1.3 Attached at Annex 1 to this report is a summary of the responses to the consultation. In total we received 46 responses. 33 responses were from individuals living in the borough and 6 were from local interested groups or organisations. Of the 34 Parish Councils in the borough, we received 7 responses.

1.1.4 Whilst the number of responses is low, those who did respond have taken the time to provide detailed and thorough feedback, for which we are extremely grateful. The responses have been circulated to the Council's Climate Change Officer Study Group who have responsibility for drafting the Strategy and Action Plan (the group includes representatives from across each Council department). The Officer Study Group considered all of the consultation responses and whilst it hasn't been possible to include all of the suggestions at this stage, we hope to be able to incorporate more of the suggestions in future versions of the Action Plan. The Action Plan will be updated and published every year.

1.2 Key Themes highlighted by Respondents

1.2.1 A Green House Gas (GHG) scoping exercise needs to be undertaken:

Several respondents felt that the strategy has not recognised or identified the scope of emissions which will be accounted for. In the original Draft Action Plan the following was stated: "*Appoint consultants to scope out existing carbon footprint and prioritise programme of activity to reduce carbon emissions*" In response to the comments received, this has now been clarified and includes the following: "*Evidence, prioritise and agree measures to be taken to lower carbon emissions at the Council. In line with GHG Protocol guidance, this will determine which entities and operations will be in scope and secondly determine which emissions sources will be in scope from TMBC estate and operations*"

1.2.2 Lack of ambition:

It is very clear from some that an "aspiration" is felt to be too weak and more measurable commitments are required, particularly where we do have the power to make the changes for example in the Council's own estate and operations. There is a request for a road map of how the Council will reach the 2030 target. This is a very valid comment as this is not addressed in the existing strategy. However, we simply cannot include this detail at this early stage. This work will be undertaken by the consultants and is included as a target within the Action Plan. As soon as this work is completed, we will publish the findings.

1.2.3 Climate Change Member Champion and Climate Change Committee:

A couple of respondents wanted a Member Champion. Cabinet Member, Cllr Robin Betts is the portfolio holder for Street Scene and Environmental Services and is also the Climate Change Champion. The work relating to climate change initiatives will be reported to SSEAB enabling regular scrutiny of progress.

1.2.4 Planning /Development/Energy Standards in the Local Plan:

A good proportion of the respondents had suggestions around planning, development and Local Plan issues. In particular reference was made that the Council should require energy efficient standards above Building Regulations. Since the Government published its response to the consultation on the changes to the National Planning Policy Framework (NPPF) it launched the 'Future Homes Standard' (FHS) in October 2019. This sets out the Government's commitment to significantly improve the energy performance of new buildings in terms of their carbon emissions through revisions to the Building Regulations. This commitment was reinforced in the Government's 'Planning for the Future' Paper (March 2020) which makes it clear that from 2025, the FHS will require up to 80% lower carbon emissions for all new homes.

The Council is of the view that the most effective and comprehensive way of improving the energy performance of new buildings is through the national Building Regulations regime. The Council does encourage energy efficient design as highlighted in the adopted Local Development Framework and in the submitted Local Plan. The changes that will come into force in 2025, which is not far away, are significant and will make a difference in the following years. The Council is mindful that any deviation from this short-term plan would require compelling local evidence to demonstrate why new buildings in Tonbridge & Malling should be built to a more energy efficient standard than the national regime. It is not something that can be introduced as a simple desire or aspiration because it impacts on viability, and therefore deliverability, of developments. The local circumstances in respect of climate change are not unique and do not, therefore, justify Tonbridge & Malling Borough Council demanding, for a relatively short period of time, an energy performance of new buildings that exceeds the requirements of the Building Regulations.

The Council, through its planning function, will continue to encourage and be supportive of new buildings that achieve energy savings that exceed those set out at the national level.

The Council has also committed to target promotion of “Solar Together” which is a collective solar group purchasing scheme. The aim is to achieve 60-80 installations over the period of the scheme and this is included in the Year 1 Action Plan.

1.2.5 Biodiversity:

Respondents were concerned about habitat loss and the impacts of development on local biodiversity. The Green Infrastructure and Ecological Network map (Policy LP19 and Appendix C of the submitted Local Plan) identifies the key habitats and wildlife corridors in the borough. These were identified in consultation with a range of natural environment partnership organisations including the Kent Local Nature Partnership. Proposals for biodiversity and habitat improvements should aim to support these in order to increase resilience of the network to climate change and facilitate species movement.

The NPPF allows for minor development in AONBs and the Kent Downs AONB Management Plan and the High Weald AONB Management Plan support some small scale development necessary to support local communities and businesses within AONBs. Submitted Local Plan Policy LP12 seeks to protect AONBs.

Biodiversity Net Gain is the newest method from central government of securing improvements in biodiversity coming through the Environment Bill. Once enacted, this will mandate 10% net gains in biodiversity on most developments (there are proposals to exclude some small scale applications) and Local

Authorities will have 2 years to establish mechanisms to deliver this. DEFRA and Natural England are leading on this.

TMBC work with a range of partners including the Kent Downs AONB Unit and High Weald AONB Unit, the Kent Local Nature Partnership and the Medway Valley Countryside Partnership to deliver a range of projects across the borough to support habitats and biodiversity.

1.2.6 Flooding and the risks associated with increased development:

This was also highlighted by several respondents. Areas at High Risk of Flooding have been excluded from residential allocations included in the submitted Local Plan. The Local Plan (Policy LP18) also requires Sustainable Drainage Systems (SuDS) to be integrated into major development schemes to help attenuate the flow of water off buildings and help with natural infiltration, thereby reducing the risks of flash flooding, which is one of the consequences of climate change.

1.2.7 Tree planting:

Although some respondents felt we should be planting more trees, we must recognise that TMBC has limited open space and we cannot convert all open spaces to woodlands. This fact was recognised by a respondent who felt the drive to increase tree cover should not be at the expense of other important habitats. As stated in the Year 1 Action Plan, we aim to publish a tree charter for the Borough, which will give consideration to the balance required to plant more trees in addition to the measures put in place to protect and manage existing tree stock.

1.2.8 Roadside verges and cutting regimes:

Predominantly this is a KCC function and any verges that the Council does own, tend to be in residential areas. It should be noted that we already receive complaints if verges in residential areas are uncut as it is felt that they attract litter, dog fouling and fly tipping. Any cutting regime will require careful consideration and will need to vary depending on the local circumstances. The creation of more meadows was also highlighted. This has taken place where appropriate and where funding has permitted.

1.2.9 Electric vehicle charging points:

This was another theme that featured in several responses. Most people welcomed a commitment to increase charge points across the borough and we will be exploring the options for EV charge points in Council owned car parks. Any on street charging will need to be done in conjunction with KCC. A respondent would also like to see free parking for electric vehicles. Rates of parking fees will be considered once charging points are in place.

1.2.10 Air Quality:

This is of concern to some of the respondents and a request was made for a separate strategy. We do have a separate Air Quality Action Plan, but the wording in the revised Climate Change Strategy has now clarified the links and benefits of meeting air quality objectives, which in turn will benefit climate change objectives (reduced travel, improved access to public transport and promotion of cycling and walking).

1.2.11 Anti-idling and incentivising the use of low emission vehicles for taxis:

Many respondents were supportive of an anti-idling campaign. Tonbridge & Malling Licensing are working towards adding anti-idling signs at the Taxi ranks within the Borough. The sign designs have already been made and the proposal is to start with two signs and then move to four to cover the entire length of the taxi rank in Waterloo Road. KCC run the school contracts and use many of our licensed vehicles for these contracts. We would support KCC if they were to introduce anti-idling at all schools where our licensed vehicles complete contracts.

It is also Tonbridge & Malling's intention to encourage our licensed fleet towards lower emission vehicles. This will be completed over a ten year period allowing vehicle owners and companies the time to invest in their vehicles going forward. There is currently a limited number of suitable vehicles available that could be used as licensed vehicles and those that are available can be very expensive. We want to support the trade as well as encourage them towards lower emissions. Members will be aware that a huge number of taxis haven't worked throughout the pandemic. This means there is a risk the consultation may not begin until the end of this year. However we will retain this action in the Year 1 plan, as we aim to undertake this work as soon as feasibly possible. We will need to work with the taxi drivers to undertake this work when they are fully operational again.

1.2.12 Communication and Engagement:

Some respondents felt we should do more to raise awareness, with a suggestion to encourage schools, businesses and churches to appoint Environmental Champions. This is an excellent idea which is now included in the Year 1 Action Plan. The aim will be to increase the visibility of the environmental agenda and share ideas and progress against climate change targets with nominated Environmental Champions in the borough. This can be done virtually via newsletters, social media and the website. The Council will be appointing a new officer to enhance our website and online presence, which will be invaluable to raise awareness of climate change issues.

1.2.13 Active Travel:

A number of respondents felt there is not enough in the strategy to encourage cycling. This is a valid point and whilst responsibility for most cycle route infrastructure lies with KCC as highway and transport authority, there is an opportunity to support a sustainable transition out of lockdown, as more people than ever have been cycling during the pandemic. There are studies that show 20mph schemes encourage active travel, increasing walking and cycling levels by about a fifth. The borough has been fortunate in receiving DfT funding for emergency active travel schemes at Tonbridge, including a town wide 20mph zone. The Council will be actively working with KCC to progress this scheme. Further funding for active travel measures is anticipated from the DfT this autumn. Officers otherwise continue to secure funding for active travel schemes through the planning process. The Council is also committed to the preparation of a Local Cycling and Walking Infrastructure Plan, which will be progressed in 2021.

1.2.14 Waste Minimisation and Recycling:

This was an area highlighted by some of the respondents who felt that the Council needs to champion and engage with residents to increase recycling. This is something the Council will be undertaking within waste services and the Recycle for All team. An action point has now been added to the Action Plan to develop a robust communication plan in partnership with KRP and TMBC media team to further improve resident communications in relation to waste minimisation and recycling. The Recycle for All team will communicate and educate, championing reducing waste, reusing what we have and correctly recycling the valid items. The Council will also promote smaller charitable commercial recycling schemes: e.g. supermarkets, Terracycle, Deposit Return Schemes (DRS) for recyclable items which we are unable to collect through our current domestic contract.

Waste that cannot be recycled is sent to Allington and is incinerated to produce electricity for the National Grid. Consultation is currently underway to extend the existing energy from waste (EfW) generating station. This extension will include the development of an additional waste treatment line. The extended generating station has the potential to deliver direct heat and power from the electricity generating process for use by local heat users which in turn contributes to achieving net zero greenhouse gas emissions. The existing station manages 560,000 tonnes per annum of non-hazardous residual waste, generating 42 Megawatts of electricity (MWe). The proposed extension would be capable of processing approximately 350,000tpa of non-hazardous residual waste, generating approximately 30MWe.

1.2.15 Plastics:

There were several references to plastics from respondents. WRAP are leading on Deposit Return Schemes (DRS) On Pack Recycling Labelling (OPRL) and the huge issue around plastics, bioplastics and compostables. The 13 Kent councils and Medway under the Kent Resource Partnership (KRP) are working with RECOUP (Pledge for Plastics) on an education campaign throughout 2020/21 to better inform residents around various plastics.

1.3 Revised Climate Change Strategy and Action Plan

1.3.1 Where possible we have tried to cover the issues raised by respondents and have included some suggestions into the Strategy and Action Plan. It is important to remember that the Action Plan only takes us until the end of the financial year.

1.3.2 The revised Climate Change Strategy 2020-2030 and the revised Climate Change Action Plan have been included as Annex 2 and Annex 3 to this report. As mentioned in the Strategy – the Action Plan will be updated and reported to this Committee each year. The outcomes and progress from each action, will also be reported to this Committee each year.

1.3.3 We are coming to the end of Year 1 and therefore aim to bring a report back to this Committee in spring 2021. This will provide an update on progress against Year 1 targets and a Draft Action Plan setting out targets and commitments for Year 2. By this time, we should also have undertaken the work with the consultants to outline the scope; determining which entities and operations will be included and determining which emissions sources will be in scope in relation to our own estate. This will then allow us to plot a carbon descent plan for our estate and operations.

1.4 Legal Implications

1.4.1 None

1.5 Financial and Value for Money Considerations

1.5.1 An earmarked reserve has been established in the sum of £250,000 to fund in full or in part recommendations/initiatives that come out of the scoping exercise in relation to the carbon descent plan for the Council.

1.5.2 £6,000 has been spent on consultancy expertise from Laser of which 50% is to be met by KCC and the balance funded from the climate change reserve.

1.6 Risk Assessment

1.6.1 N/A

1.7 Equality Impact Assessment

1.7.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.8 Policy Considerations

1.8.1 Asset Management

1.8.2 Biodiversity & Sustainability

1.8.3 Business Continuity/Resilience

1.8.4 Climate Change

1.8.5 Communications

1.8.6 Healthy Lifestyles

1.8.7 Community

1.9 Recommendations

1.9.1 That the revised Climate Change Strategy as set out in Annex 2 of this report **BE ADOPTED**

1.9.2 That the Year 1 Climate Change Action Plan as set out in Annex 3 of this report **BE ADOPTED**

Background papers: contact: Gill Fox

Nil

Julie Beilby
Chief Executive

Draft Climate Change Strategy / Draft Action Plan

Consultation Summary

Overall, the majority (72%) of respondents were pleased with the Climate Change strategy and its contribution towards the Council's aspiration of carbon neutrality by 2030. Respondents were encouraged by the seriousness with which the Council approached the issue and its willingness to work with new partners and to adopt new approaches.

Initiatives which respondents were encouraged to see included the commitment to reducing chemical usage by the Council across its estates; the creation of a wildflower meadow in Leybourne; the intention to strengthen public transport through a proposed bus partnership; the introduction of a 20 mph speed limit in Tonbridge and the creation of a dedicated climate change page on the Council's website.

The Council was pleased to receive a large number of constructive comments from respondents who put forward suggestions ranging from minor amendments to additional initiatives that the Council might adopt. Particular thanks goes to those who highlighted new material, flagged up individual cases in the Borough and offered their services to the Council to help tackle climate change.

- Biodiversity and the wider local environment is extremely important to local people and this concern was reflected across many of the responses. While people were pleased to see the specific cases that were highlighted in the strategy and action plan, a number of responses expressed interest in a number of local sites and also provided suggestions relating to initiatives such as tree planting and bio diversification across a number of sites around the Borough. Other respondents wanted to see specific details in relation to certain initiatives such as the particularities of proposed landscaping work on verges and other Council owned land.

- A few respondents wanted more details and a wider program relating to renewable energy creation (solar, wind etc.) in the Borough. This related to the designation of sites for this use, the process of securing private sector funding and the financial incentives that might make this happen.

- There was consensus across respondents that electric vehicle (EV) infrastructure across Council owned car parks will be crucial in assisting efforts at achieving carbon neutrality across the Borough.

- A few respondents queried the timeframe for the phasing out of the use of boilers in new development across the Borough. The Council committed to meeting the governments deadline of 2025, but the respondents wanted to know why it wasn't possible to phase them out now.

- There were a few concerns about the current recycling coverage in the Borough, with resident respondents asking for more items to be covered by the local collection. Furthermore, a couple of respondents offered advice relating to the reusing of recyclable material in the local area.

- One respondent was concerned that the housing developments planned in the Borough would have a negative impact on the Council's aspiration of being carbon neutral by 2030. However, a number of respondents where interested in how the Council could enforce high environmental/low-carbon standards on private developers operating in the Borough.

- Several respondents would have preferred to see a greater focus on cycling and its supporting infrastructure in the draft. Respondents put forward suggestions relating to routes, uptake initiatives and potential sites for bike racks.

- A couple of respondents asked for greater clarity and detail on how the local taxi fleet might be encouraged to move from a petrol diesel inventory to one comprised of electric vehicles. This concern also extended to the vehicles used by Council partners and contractors.

- A couple of respondents wanted to see more clarification relating to the scale of the bus partnership scheme. There were questions about how the Council would work with KCC, what the coverage and frequency of the service would be and where the funding for the scheme would originate.

- The draft outlined the Council's plan to create a dedicated climate change page on its website, an initiative that was well received by respondents. There were a couple of responses concerned that the webpage would lack the number of visitors to provide a successful source of information for local people. A couple of respondents suggested ways in which the circulation and traffic would be higher and how the page should be marketed.

- A number of responses related to a lack of full definitions for topics covered in the draft. These related to a small number of subjects including carbon neutrality, various government legislations covering the flexibility of adopting ultra-low-carbon standards in planning, and the criteria of sustainable development. The most common of these related to a criteria to measure and designate the types of carbon pollution and responses. A number of respondents wanted to see the Greenhouse Gas Protocol (GHGP) referenced and the evidence and measurement base written around it. In a couple of cases respondents wanted the Council to adhere to a strict timetable for hitting carbon reduction targets and wider issues relating to the GHGP and other international programs and standards.

- Finally, there were a number of suggestions from respondents for measures/initiatives which could be implemented immediately or in the near

future. These suggestions included: the appointment of ‘Climate Change Champions’ from major local businesses who would work with the Council in a private/public partnership to meet carbon neutral targets; the creation of a dedicated Council member for Climate Change who would coordinate a dedicated response and program aimed at CN2030; and a revision of the Local Plan to place the subject of climate change more centrally.

Overall, the Council was very grateful for the number, depth and constructiveness of the comments received in the consultation.

Tonbridge & Malling Borough Council

Climate Change Strategy 2020 - 2030

TONBRIDGE & MALLING BOROUGH COUNCIL

www.tmbc.gov.uk

Foreword

It is recognised by Government and scientists internationally, that climate change is the most important environmental challenge that we face. As a local authority, Tonbridge and Malling Borough Council has an important leadership role to play in responding to the challenges posed by climate change, particularly relating to the delivery of our key services, but also more widely through working with partners and other agencies to influence mitigation and positive change. We recognise our pivotal role to act as an advocate to all sectors of our communities, in promoting sustainable policies to deliver a reduction in carbon emissions across the Borough.

A motion adopted by full Council in July 2019 sets out the "aspiration for Tonbridge and Malling to be carbon neutral by 2030" and for a strategy to be developed to support this ambition.

This strategy sets out our commitment to local action on climate change, our commitment to biodiversity protection and enhancement and our approach to partnership working.

The strategy takes us to 2030, however meeting the challenges and delivering on the aspirations within the strategy will be driven forward through a climate change action plan. This will be updated annually and actions and progress will be reported and published on our website each year. The targets within the action plan will help us move towards a low carbon future, improve our resilience to the effects of a changing climate as well as capturing the opportunities and benefits of transitioning to a low carbon future.

Climate change will directly impact how we, as a Council plan our activities in order to meet the needs of all residents in the Borough today and in the future. We recognise that climate change is a collective issue and that we all need to make changes to our lifestyles to reduce our impact on the environment. We will work with statutory partners, local businesses, local community groups and individuals to raise awareness and help to influence change. The Council has a key role in supporting and promoting local actions, we recognise that we don't solely have all the required powers and resources to do this. Only by working in partnership can we help to influence the effects of climate change now and for generations to come.

Cllr Nicolas Heslop

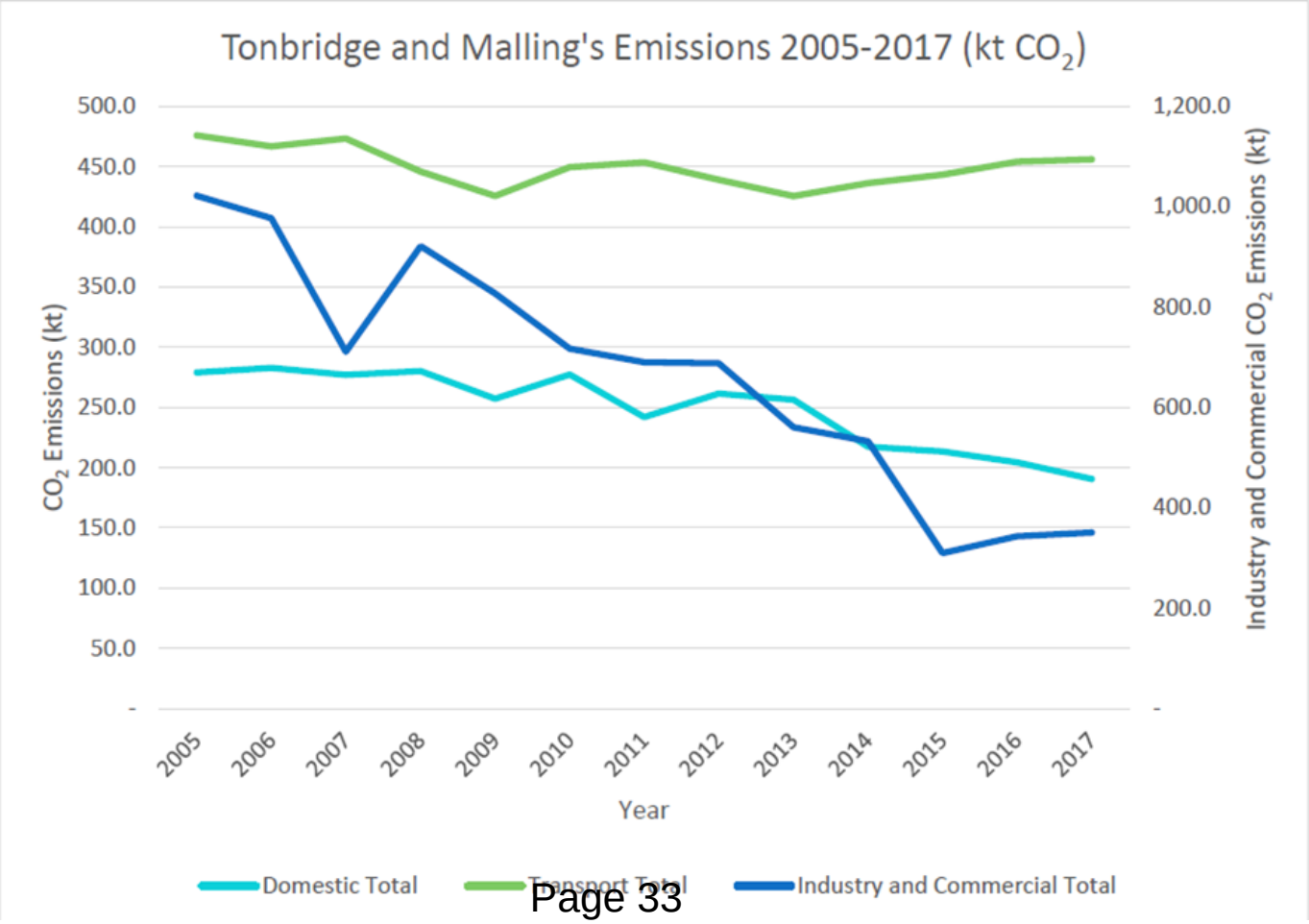
Leader of Tonbridge & Malling Borough Council

Setting Climate Commitments for Tonbridge and Malling

The Tyndall Centre for Climate Research has carried out an analysis of the UK's carbon budget for delivering the Paris Agreement's commitment to staying "well below 2°C and pursuing 1.5°C global temperature rise". Based on their assessment, they recommend that the borough of Tonbridge and Malling stay within a maximum cumulative carbon dioxide emissions budget of 6.4 million tonnes (MtCO2) between 2020 and 2100. Based on 2017 carbon dioxide emissions, Tonbridge and Malling would use the entire budget by 2027.

Staying within the carbon budget will only be possible if Tonbridge and Malling rapidly transition away from fossil fuel use. There will be significant challenges ahead, which we will need to confront in order to make a difference.

Figure 1 below shows the total carbon emissions by sector for Tonbridge and Malling (BEIS, 2019).



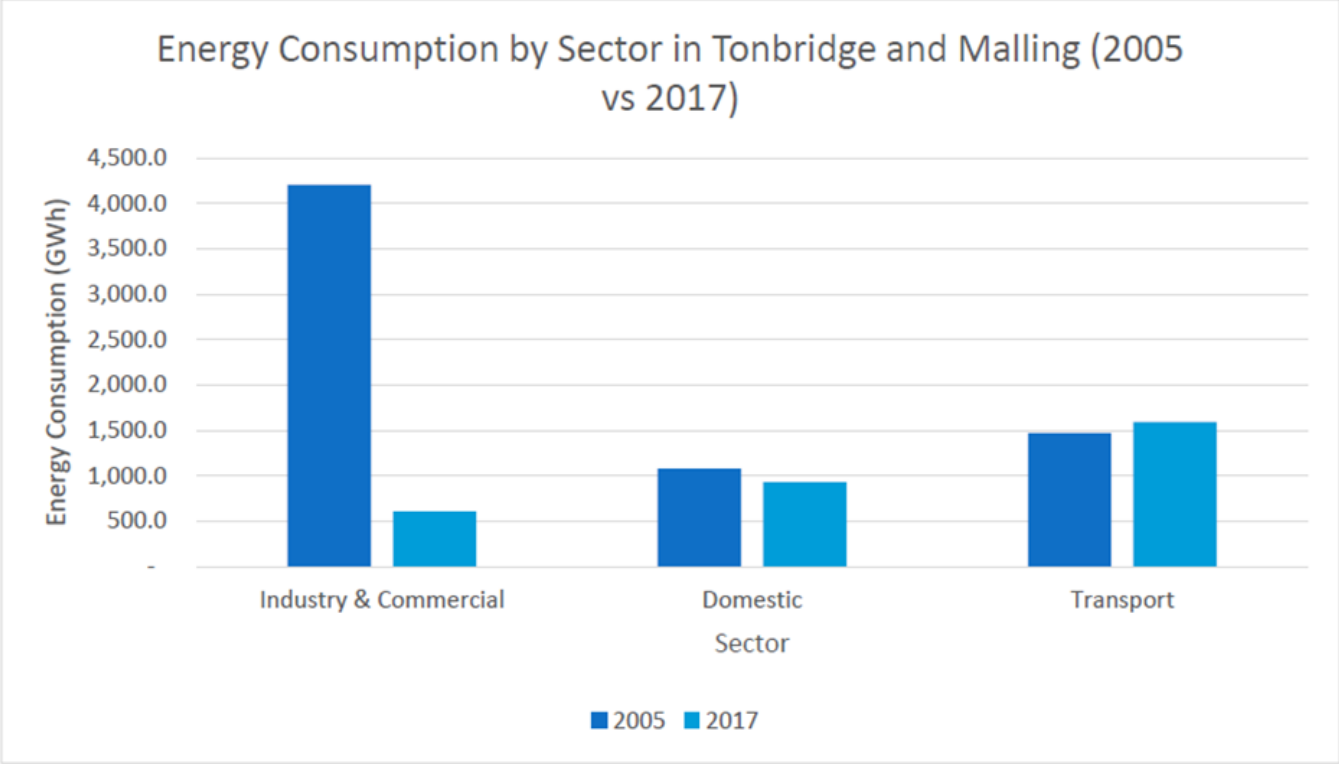


Figure 2 (above) shows energy consumption by GWh sector for Tonbridge and Malling (BEIS, 2019). Along with energy efficiency measures in the private sector, a contributing factor to the dramatic decline in energy consumption was the closure of Aylesford Newsprint in 2015.

Energy usage per household

The average domestic consumption per household in Tonbridge and Malling was 4,172kWh in 2018. From 2015 to 2018 the average domestic consumption per household fell from 4469kWh to 4172kWh. Whilst domestic consumption has been falling on a per household basis, the number of households has been increasing.

For gas, the mean consumption (domestic and non-domestic) in Tonbridge and Malling in 2018 was 18,339GWh, higher than the Kent average of 18,291GWh. This is lower than in 2015 where the mean for Tonbridge and Malling was 18,533GWh. Gas remains the main source of domestic emissions and heating. The government has proposed to ban the installation of gas fired boilers in new homes from 2025, in a bid to tackle emissions. The retrofitting of existing dwellings to remove boilers in favour of low emission alternatives, does however remain a challenge that requires government support.

Renewable electricity

In Tonbridge and Malling (end of 2018) there were 1353 installation sites producing 40,011MWh of renewable electricity. Of these installation sites, 99.3% were photovoltaic specific, however this accounted for just 29% of the total renewable electricity generated. The remaining electricity came from the conversion of landfill gas (42%), anaerobic digestion (18%), sewage gas (9%), plant biomas (<2%) and onshore wind (<1%).

Renewable Heat Incentive (RHI) accreditation – the RHI is a government scheme that aims to encourage the uptake of renewable heat technologies amongst householders, communities and businesses through financial incentives. Between April 2014 and October 2019, 100 domestic installations have been accredited in Tonbridge and Malling - 8% of Kent and Medway's total. Further work is required to accelerate the take up of low emission heating systems.

A commitment to reduce CO2 emissions needs to be made across all sectors. At Tonbridge and Malling Borough Council we will reduce emissions from energy consumption in all Council buildings, in house fleet transport and staff travel. We are committed to fully embed carbon management within all Council policies and procedures and ensure that climate change is a recognised commitment within the Corporate Strategy. We will raise carbon management awareness to staff to reduce energy consumption. We will also incorporate the highest appropriate energy efficiency specifications into new buildings, equipment and contracts.

We are stakeholders in the Kent and Medway Energy and Low Emission Strategy and Climate Change strategy and our action plan will sit alongside these.

Adapting to climate change

It is important that Tonbridge and Malling is resilient to the effects of climate change. We are already experiencing hotter, drier summers and warmer, wetter winters. With this we have seen an increase in incidents of severe weather such as storms and flooding. The Council will work with partners through the Kent Resilience Forum to plan and prepare for these impacts and minimise the risk to communities.

We will work with Kent County Council on the Kent and Medway Climate Change Adaptation Programme and Implementation Plan, which aims to assess and prioritise risks and impacts climate change will have on key sectors. Working in collaboration with partners we will focus activity to fully understand and prepare for current and future risks such as flooding, which is recognised as a key risk for the borough. We are members of the Medway Flood Partnership at both a strategic and operational level.

We will work with communities and businesses to increase resilience to future changes in climate, such as promoting the Flood Warden Scheme, assisting businesses and residents to prepare and adapt to climate change and ensuring that spaces and habitats are well adapted to a changing climate. We will also protect and enhance native species and habitats, promoting opportunities for environmental management and enhancement.

Sustainable Development

The Council has a key role in ensuring that new housing and development in the borough is as sustainable as possible. Planning policies and controls are in place to ensure that any new growth takes into account sustainability issues, such as reducing the need to travel, minimising energy and water consumption and the ability to harness energy from renewable sources.

Planning policies and development allocations are being updated in the new Local Plan, to ensure that developments respond to sustainability considerations, these include;

- Developments which maximise opportunities to reduce energy demands through the orientation of habitable rooms to harness natural light and through landscaping to prevent over heating (draft policy LP14).

- Developments which maximise opportunities where practicable for sustainable travel, including contributions towards off site infrastructure as well as walking and cycling routes and infrastructure, reflecting the amount of movement generated and the nature and location of each site (draft policy LP23).

- Major developments will, where practicable and proportionate, provide opportunities for habitat creation (draft policy LP19), and where possible maximise opportunities for net biodiversity gains on site (draft policies LP27-31)

- New dwellings will be required to make provision for an electric vehicle charging point with each property. This is also required where practicable and proportionate for non-residential developments.

- New dwellings will be required to meet the Building regulations optional requirement for tighter water efficiency of 110 litres/person/day (draft policy LP44).

The Council is mindful that Housing Standards Review in 2014 resulted in the Coalition Government winding down the voluntary Code for Sustainable Homes, and made it clear that local plans should not be setting any additional local technical standards or requirements relating to the energy performance of new dwellings. The view taken by the Government was that the energy performance of new build homes is a matter for the national Building Regulations regime.

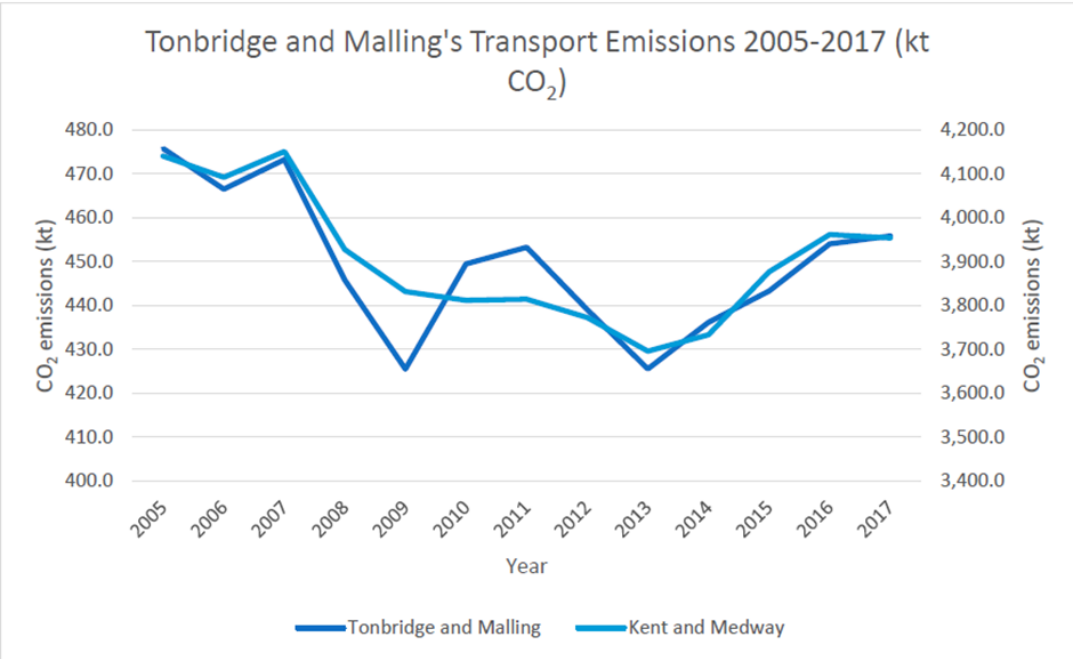
The submitted Local Plan responds well to the sections of the National Planning Policy Framework (NPPF) addressing 'Planning for climate change'. Where the Local Plan is silent on a specific issue, the NPPF and this Climate Change strategy will remain material planning considerations to be taken into account in determining future planning applications. The Plan will be subject to review once adopted and any new national policy initiatives, including for climate change, will form part of that exercise.

It is anticipated that the government will introduce the Future Homes Standard by 2025, which will set new requirements for new homes built in England via Part L and Part F of the Building Regulations. It is anticipated that this will require new build homes to be future-proofed with low carbon heating, and world-leading levels of energy efficiency, as a consequence the installation of gas boilers will cease.

Transport

In Tonbridge and Malling CO2 emissions from the transport sector have risen by 7% since 2013.

Figure 3 below shows the carbon emissions from the Transport Sector in Tonbridge and Malling (BEIS, 2019).



Reducing the need to travel using technology and smarter ways of working will help to reduce transport emissions. The Council's adopted digital strategy contains ambitions and actions that support carbon reduction. There are also opportunities to raise public awareness of sustainable travel choices. In addition to reducing vehicle mileage, we will also promote smarter driving and undertake an anti-idling campaign to eliminate emissions from idling engines.

Working with Kent County Council and transport operators to provide an integrated transport system that promotes lower carbon and healthy transport choices within Tonbridge and Malling will also be instrumental in lowering carbon emissions from this sector. The Council is seeking options to have a greater influence here through its work with the West Kent Partnership, including the establishment of a new Quality Bus Partnership.

The Borough Council also has a specific role to play as a licencing authority. By improving the environmental standards of licensed taxis operating in the borough, we intend to reduce emissions from older, more polluting vehicles. We will be running consultations detailing our plans over the next ten years, requiring all taxis to adhere to a vehicle replacement schedule, to meet higher Euro emissions standards and ultimately work towards all taxis becoming Ultra Low Emission Vehicles (ULEV).

Although the Council does not own a large fleet of vehicles, there are a small number of parking and enforcement vehicles that we will replace to become electric vehicles or ULEV. Similarly, contractors, such as our waste and recycling providers, will be encouraged to use ULEVs in order to undertake work for the Council.

A move towards ULEVs will help to reduce transport emissions. Providing the infrastructure to support electric vehicles will be instrumental in facilitating the change to greener vehicles. In order to achieve this change, Tonbridge and Malling Borough Council has made a commitment to provide electric charging points across the borough, so that it is one of the most welcoming places in the country for driving electric and hybrid vehicles.

Air Quality

The Borough Council has a statutory duty under Local Air Quality Management (LAQM) Legislation to review air quality within its area, and where concentrations exceed national objectives, put in place measures within an Air Quality Action Plan to reduce emissions.

These statutory duties are very much directed at preventing risks to health and amenity from a variety of pollutants, but those pollutants are not necessarily the same as those associated with Climate Change. However, there is a synergy between our statutory duties for the betterment of public health and the aims of this Climate Change Strategy; improvements to one will lead to improvements in the other. Our statutory work can therefore lead to a reduction in pollutants that contribute to climate change.

Ongoing assessments of air quality within the borough of Tonbridge and Malling have identified six areas where levels of Nitrogen Dioxide have at some point exceeded the annual objective limit of 40µg/m-3 and have been declared Air Quality Management Areas. These are;

M20, between New Hythe Lane and Hall Road,

Tonbridge High Street between Vale Road and The Botany,

A26, Wateringbury Crossroads

A20 Aylesford

A20 Larkfield

A25 SevenoaksRd/Western Rd Borough Green

The Borough Council will continually monitor and update its Air Quality Action Plan for these areas, and as part of this work will review the change in levels over the years.

All monitoring sites within Tonbridge and Malling have shown a slow trend in the improvement in Nitrogen Dioxide levels. In 2018, (the last full year results available at the time of writing), Tonbridge High Street, Borough Green and M20 monitoring sites within those AQMA's all achieved levels below the 40µg/m-3 annual objective for Nitrogen Dioxide. However, our AQMA in Wateringbury still recorded the second highest level of Nitrogen Dioxide in Kent.

Recognising the links between local air quality, planning, transportation, and climate change pollutants, we will continue our work with the Kent & Medway Air Quality Partnership to secure a co-ordinated approach to the monitoring and improvement of air quality in Kent. We will update as necessary our Air Quality Action Plan to continue to seek improvements in air quality within our Air Quality Management Areas and across the Borough in general, we will work with KCC and other partners to promote and encourage the use of sustainable travel options and be early adopters of strategy documents aimed at improving air quality, including the KCC Energy and Low Emission Strategy.

Habitats and Biodiversity

In addition to key outdoor leisure sites, the Council has two country parks (Haysden and Leybourne Lakes Country Park) both of which have been awarded Green Flag awards. We produce management plans for all key outdoor sites and will review them regularly, taking into account nature, biodiversity and conservation.

Where possible we will create and maintain buffer zones of mixed vegetation on edges of open spaces and against water areas to create habitats and habitat corridors. We will commit to reducing chemical use as much as reasonably practicable and ensure that our main contractor working at the sites, hold ISO140001 environmental accreditation or have other appropriate environmental safeguarding strategies in place.

Raising awareness locally will be a key objective and we will provide educational events for the public on sites across the borough that relate to nature, wildlife, biodiversity and its importance. In addition we will continue to core fund Medway Valley Countryside Partnership to assist in delivering various works and education across the borough regarding all environmental issues.

Working with partners, we will produce a Tree Charter for the Borough, with the aim of retaining a planting budget to re-plant trees where appropriate and ensure that trees in the borough are well cared for. We will work with local landowners and developers to encourage tree planting and explore suitable opportunities for planting within boundaries and hedgerows. We will also seek to maximise tree planting through the development process where possible and appropriate.

We will continue to fund and work in partnership with the Kent Downs Area of Outstanding Natural Beauty (AONB) Unit and High Weald AONB Unit in the review of the AONB Management Plans. Once adopted, these form Council policy for the management of the AONBs and for the carrying out of functions relating to it. We will continue to explore external funding opportunities through these partnerships to deliver projects within the AONBs that support the aims of the Management Plans.

We will also continue to support the Old Chalk New Downs project which aims to restore and connect remaining fragments of chalk grassland in the North Downs to facilitate the spread and survival or rare species and raise awareness of the habitat through engagement schemes.

Housing and Energy Conservation

The reduction of carbon emissions from residential homes, both new build and existing properties, is a key focus in addressing the challenge of climate change. Residential homes represent 14% of emissions (Committee on Climate Change 2019) of which the majority is from space heating.

To help reduce domestic carbon emissions we will promote retrofitting of insulation measures and efficient heating. We will also support the decarbonisation of energy supply through low carbon electricity for example photovoltaic panels and retrofitting of low carbon heating systems. For new build housing energy conservation requirements are dealt with under Building Regulations.

The Council's focus is to improve existing housing condition ensuring homes are safe and warm by encouraging and supporting the installation of both energy conservation and efficiency measures. Our private sector housing work directly links with sustainability objectives. We will adopt a whole house approach considering energy conservation, energy efficiency and renewable energy options. There are also additional benefits to residents improving their homes, including reduced energy consumption and therefore lower bills, improved thermal comfort and improved well-being.

Home energy efficiency work is delivered through a combination of advice, marketing and promotion, energy efficiency schemes, financial assistance and signposting to funded or discounted measures where available in partnership with other agencies.

Waste Minimisation and Recycling

Managing the way we deal with waste, helps to tackle climate change and reduce carbon emissions. We will encourage more people to reduce their waste and make it easier for residents to compost or recycle.

We have drastically reduced our waste to landfill over recent years with the opening of Kent Enviropower (Energy from Waste) facility in Allington, which is geographically beneficial in reducing waste miles too. Waste sent to Allington is incinerated to produce electricity for the National Grid.

Across Kent over the last 13 years we are annually recycling and composting 43% (TMBC 41.9% 2018/19). TMBC aims to increase this to over 50% in 2020/21 as well as decreasing over all tonnage collected through minimisation of packaging etc.

We are committed to increasing kerbside recycling, re-routing rounds to maximise efficiency and time spent on the road and will set tangible annual targets to reduce waste sent to landfill or incineration.

Community and Business Engagement

Individuals, households, communities and business all have a role to play in lowering carbon emissions and tackling climate change. The Council has a leadership role which can be used to inform and influence decision making, enabling changes in behaviour which will address climate change issues. We will secure debate at a range of forums including, the West Kent Partnership, the Local Strategic Partnership, our business engagement events, the Parish Partnership Panel and Tonbridge Forum.

We will work in partnership to raise awareness of climate change, providing updates and information. Assistance and advice will be available via our website and social media, to ensure that messaging about climate change is reaching everyone to enable them to reduce their carbon footprint.

We will progress the digitisation of services which will include the way we interact with our clients, such as actively encouraging residents to switch to paperless billing. We will reduce the amount of paper both internally as well as paper that is being sent out to clients.

We will work with our contractors, such as Urbaser (waste and recycling providers), the Tonbridge and Malling Leisure Trust (who manage the Leisure Centres) and our grounds maintenance contractors to bring forward their action plans to address climate change issues.

We will also encourage and promote excellence and best practice within the Borough. There are many examples within the Borough including at East Malling Research Station where NIAB EMR is leading innovation in sustainable use of water for agricultural use. Promoting such initiatives will stimulate debate and share learning across sectors.

Lower Carbon across South East – LoCASE

The Borough Council plays a key role in supporting local businesses and contributing towards sustainable growth in the economy. A number of initiatives are already underway that contribute towards carbon reduction, resource efficiency and climate change resilience.

In Tonbridge and Malling 24 SMEs have received and used grants for low carbon and energy efficiency measures. The types of businesses gaining grant money include construction and manufacturing firms, consultancy and business services, as well as property and distribution businesses. Grant money has helped these SMEs to improve their heating and lighting, research and development (IT and software, and machinery) and for the purchase of Ultra Low Emission Vehicles (KCC LoCase, 2019).

The Council will commit to delivery of the Economic Development Strategy to encourage sustainable growth in the borough and promote the take up of LoCASE and other grants to address carbon emissions and the impact of climate change.

Climate Change Action Plan – 2020/21

The Climate Change Strategy sets out the aspiration for Tonbridge & Malling to be carbon neutral by 2030. The action plan targets will help to support this ambition and will be set and published on an annual basis.

THEME	TARGET	TIMESCALE
Policy and Engagement Recognise climate change as a corporate commitment for the Council	Ensure climate change is recognised as a priority within the Corporate Strategy 2020 – 2023 Ensure climate change issues and biodiversity goals are considered in decision making, by including climate change impacts within all reports to Council Members.	Adopt revised strategy in 2020 Ongoing
Work with partners to address climate change issues, lower carbon and adapt to the effects of climate change	Sign up to and adopt the principles of the Kent Environment Strategy, Kent and Medway Energy and Low Emissions Strategy and the Climate Change Adaptation and Implementation Plan. Ensure representation and input into key partnership working groups in Kent.	Ongoing
Evidence, prioritise and agree measures to be taken to lower carbon emissions at the Council. In line with GHG Protocol guidance, this will determine which entities and operations will be in scope and secondly determine which emissions sources will be in scope	Appoint consultants to scope out existing carbon footprint and prioritise programme of activity to reduce carbon emissions from TMBC estate and operations. Approve future targets.	September 2020

THEME	TARGET	TIMESCALE
Sustainable Development	Through the grant of planning permission, the Council will seek to deliver sustainable development outcomes in line with the adopted development plan and future amendments to this.	Ongoing
Transport Work with partners to support the delivery of active and sustainable transport infrastructure improvements and initiatives, to encourage the take up of these modes for everyday journeys and support active lifestyles.	Through the grant of planning permission, seek to prioritise active and sustainable travel outcomes within all new developments, and where appropriate to secure s106 contributions towards off-site improvements.	Ongoing
	Working in partnership with KCC through the West Kent Infrastructure and Transport Sub Group as well as through the Council's Joint Transportation Board, to secure funding for and promote the implementation of active and sustainable transport infrastructure improvements.	Ongoing
	Using Department for Transport's Emergency Active Travel Fund, work with KCC to introduce a town-wide 20mph zone in Tonbridge.	March 2021
Review and implement the TMBC corporate staff travel plan and work with KCC through their STAR programme to support the wider take up of work place travel planning, and active travel promotion.	Strengthen the corporate staff travel plan, including cycle to work scheme and other sustainable travel initiatives.	March 2021
	Host an active travel road show(s) in the borough, to be delivered by Active Mob (KCC funded), and to encourage business engagement.	March 2021
	Bring forward a proposal to work in partnership with KCC and other stakeholders on the preparation of a draft walking and cycling strategy for the borough, to replace the outgoing strategy.	March 2021

THEME	TARGET	TIMESCALE
Transport Improve the environmental standards of licensed taxis operating in the borough.	Undertake consultation with taxi stake holders regarding a phased vehicle replacement schedule, to meet higher Euro emission standards, working towards vehicles becoming Zero emission capable (ZEC) or Ultra Low Emission (ULEV) over the next 10 years.	March 2021
ULEV Provide electric charging points across the borough.	Research cost and practicalities of introducing electric vehicle charging points at Council owned public car parks and the Council Offices. Publish findings. Working in partnership with Tonbridge and Malling Leisure Trust, research cost and practicalities of introducing electric vehicle charging points at Leisure sites. Publish findings. Undertake a vehicle replacement schedule (transitioning to ULEV) for all parking vehicles, in line with capital renewals programme and expected lifespan.	March 2021 March 2021 Ongoing
Air Quality Review Air Quality and put measures in place to reduce emissions.	In partnership with KCC, prepare and launch a public awareness and travel choices campaign. Consider installation of green walls/increased vegetation. Publish findings.	March 2021 March 2021

THEME	TARGET	TIMESCALE
Air Quality	In partnership with KCC and linking to the “Smart Cities” agenda, improve public transport information availability by developing App based systems to deliver high quality accessible information. Develop a borough wide Anti Idling Campaign, to eliminate emissions from idling engines.	March 2021 March 2021
Habitats and Biodiversity Strengthen local protection and enhance protection of species, habitats and ecosystems	Working with relevant partners, produce, adopt and publish a Tree Charter for the Borough. Create a larger wildflower meadow at Leybourne Lakes Country Park Install a new sewage disposal plant at Haysden Country Park to reduce amount and frequency of waste being taken offsite.	March 2021 2020 2020

THEME	TARGET	TIMESCALE
Housing and Energy Conservation	Support our residents by signposting to information on energy efficiency measures and funding schemes so they can make informed decisions. In addition we will seek to assist 10 eligible low income vulnerable to cold households to access affordable warmth in the home through the Council's housing assistance, where other forms of funding are not available or top up funding may be required. The council purchased four houses in March 2020 and intends to convert them to provide 12 individual units. A feasibility assessment for energy efficiency measures will be included in the project, to explore options such as low carbon heating systems, PV panels and other renewable measures. Proactively target 75 private rented properties to undertake HHSRS assessment to identify significant hazards including excess cold. As part of this work we will offer energy efficiency advice to landlords and identify properties with a Category 1 Excess Cold hazard present and where necessary the appropriate enforcement action will be taken or the landlord may be eligible for housing assistance to improve the energy efficiency and help reduce carbon emissions.	March 2021 March 2021 March 2021

THEME	TARGET	TIMESCALE
Housing and Energy Conservation	Assist with removing barriers for private sector households by working with Kent County Council to target promotion of 'Solar Together' a collective solar group purchasing scheme with the aim of achieving 60-80 accepted Solar Together recommendations by the end of the year. The Council will monitor the response to determine future promotion of this initiative.	March 2021
	Look at the feasibility of setting a minimum energy efficiency standard EPC rating as a licence condition for mandatory licensable Houses in Multiple Occupation (HMOs) and include in the Council adopted guidance on minimum amenity standards for all HMOs, where an Energy Performance Certificate is required.	March 2021
Waste Minimisation and Recycling		
Encourage more people to reduce their waste and make it easier for residents to recycle.	Increase our recycling rate from 43% to 50%	March 2021
	Develop a robust communication plan in partnership with KRP and TMBC media team to further improve resident communications in relation to waste minimisation and recycling.	March 2021
Community and Business Engagement Raise awareness of climate change, providing regular updates and information.	Create and maintain a designated climate change web page on the TMBC website.	Ongoing

THEME	TARGET	TIMESCALE
Community and Business Engagement Support local businesses and encourage sustainable growth in the economy.	Promote and increase uptake of the Council grant scheme to improve local centres and parades. Publicise grants via business newsletters, social media and promotion to ensure that grants (of up to £3,500) are used to deliver energy efficiency measures.	March 2021
	Promote and increase uptake of the LOCASE grant scheme to tackle and adapt to climate change. Publicise grants via business newsletters, social media and promotion.	Ongoing, until end of 2020.
	Promote climate change messaging to local businesses using social media and by publishing a monthly business bulletin to support the climate change agenda.	Ongoing.
	Review Economic Regeneration Strategy to include measures that encourage sustainable economic development and green growth.	March 2021

THEME	TARGET	TIMESCALE
Community and Business Engagement	Working with the Media and Communications Team, develop a communications strategy to raise awareness of domestic housing energy efficiency and renewable energy schemes available. Encourage schools, businesses and churches to appoint Environmental Champions, to increase the visibility of the environmental agenda and share ideas and progress against climate change.	March 2021 March 2021
TMBC ESTATE Reduce the environmental impact of the Council's activities, increasing the sustainability of all our operations.	Change energy supplier to ensure that energy provided to the Council is supplied by renewable sources. Evaluate the viability of installing renewable energy systems at Larkfield Leisure Centre, publish findings. Research cost and practicalities of replacing Council owned pay and display machines to be solar powered. Publish findings.	September 2020 March 2021 March 2021

THEME	TARGET	TIMESCALE
TMBC ESTATE Progress the digitisation of services and reduce the amount of paper both internally and being sent out to clients.	Amend Council Procurement Policy to include a requirement that any equipment replacements are more energy efficient with higher environmental standards.	March 2021
	Undertake an assessment of business mileage for all staff and develop a policy to support tele-conferencing and skype meetings to reduce business travel.	March 2021
	Amend the Homeworking Policy to encourage greater take up of homeworking/flexible working where possible, to reduce home to work travel.	March 2021
	Introduce ‘Always on VPN’ remote working solution to enable staff to work more flexibly.	March 2021
	Introduction of mobile working to improve efficiency and reduce repeat visits along with printing and mailing paper works to clients (Public Health, Housing, Electoral services)	March 2021
	Consolidation of devices and swapping desktop machines to more energy efficient laptops.	March 2021
	Migration of our Disaster Recovery services to a cloud based platform	March 2021
	Introduction of online and automated solutions for internal administrative workflows to further eliminate paper based forms	March 2021

THEME	TARGET	TIMESCALE
TMBC ESTATE	Introduction of online services and e-Billing (Revs & Bens)	March 2021
	Back scanning of existing paper records and digitisation of future documents (Public Health, Environmental protection, Exchequer, Payroll, Planning)	March 2021
	Introduction of a unified “My Account” customer portal enabled via a new CMS and CRM systems including a new functionality and feature-rich Website	March 2021

TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Directors of Street Scene, Leisure & Technical Services and Finance and Transformation

Part 1- Public

Matters for Recommendation to Cabinet - Key Decision

1 OFF-STREET CAR PARKING CHARGES

Summary
This report updates Members on the current position and proposed timescale in relation to the implementation of the proposed changes to off street car parking charges, and the need to progress a survey to determine user profiles in the Aylesford and Martin Square car parks. The report considers previous reports to this Advisory Board and Cabinet, and takes in to account the impact of the Covid-19 pandemic.

1.1 Introduction

1.1.1 At the last meeting of this Board on the 5th March 2020, Members considered the outcome of the formal consultation on the annual review of car parking charges and proposals to amend the existing parking charges across the Borough.

1.1.2 The recommendations from this Board were due to be considered at the Cabinet meeting on the 17 March 2020. Due to the Covid-19 pandemic this meeting was cancelled and at the 3 June 2020 meeting of Cabinet the decision to introduce these price variations was deferred until the next annual cycle of price review.

1.1.3 At its meeting on 6 January 2020, Cabinet approved the proposal to introduce car parking charges to existing free-for-use car parks in Aylesford, Martin Square and Snodland. Following this decision, a consultation was undertaken on the detailed proposals for both Aylesford and Martin Square with Snodland to follow on a slightly different timescale. Unfortunately due to a drafting error in the consultation documents the outcome of this consultation exercise cannot be considered as the formal consultation process. The feedback received is however extremely useful to review prior to undertaking further consultation in the future.

1.1.4 The consultation responses have assisted in gaining a fuller understanding of the concerns of the users of the car parks and illustrate that there are a number of different user groups. To get a more detailed picture external consultants were engaged to carry out car park usage surveys and customer surveys to enable this information to be used to help guide the review of the charges. Unfortunately the

rise of the Covid -19 pandemic weeks before the proposed surveys has meant that these have had to be delayed.

1.1.5 Surveys on parking habits aim to take a snapshot of the parking arrangements under normal operating conditions, but due to Covid-19 there is significant disruption to traffic patterns and parking habits and any surveys will need to wait until there is a return to more normal traffic patterns and car park usage.

1.2 Variation of Existing Charges

1.2.1 Following the outbreak of the Covid 19 pandemic, the previously reported parking charge proposals were put on hold by Cabinet for review as part of the next cycle of price review. The timescale for this next cycle is relatively short as we would seek to align the off-street and on-street charging regime timescales.

1.2.2 The next step is to implement the charges as reported to the March 2020 meeting of this Board and these are attached in **Annex 1**. This requires the advertisement of the legal order that varies the prices in line with the detail shown in **Annex 1**.

1.2.3 The proposal is to introduce the new charges from 4 April 2021, a year later than originally proposed. This means that there would have been no increase in existing car parking charges for 3 years.

1.3 Aylesford and Martin Square car parks

1.3.1 At its meeting in January 2020 Cabinet agreed the principle of the introduction of car parking charges in Aylesford and Martin Square car parks with a wider review of the on and off street parking arrangements being proposed for Snodland.

1.3.2 Consultation was carried out earlier this year. Early in the consultation process it was discovered that there was a drafting error which omitted one of the price bands in the charges.

1.3.3 This error rendered the formal consultation process as being flawed. However this consultation process generated a number of useful responses and it is clear that the proposed charging models for each car park would benefit from being reviewed. We have also identified the need to carry out some survey work to ascertain the user profiles and duration of stay as this will also assist in the proposed charging models. It is essential that this survey work be conducted at a point in time when the usage of the car parks has returned to some level of normality following the Covid 19 pandemic. The date for this is not possible to predict at this stage and will need to be kept under review.

1.4 Legal Implications

1.4.1 The statutory framework governing the response to the pandemic is evolving and changing on a frequent basis, both in the restrictions placed upon individuals and

upon the responsibility of local authorities. Specific proposal or changes brought forward following a review of the services will be assessed at the appropriate time in liaison with Legal Services to ensure they are lawful.

1.4.2 The powers allowing the Borough Council to carry out parking management activity are contained in the Road Traffic Regulation Act 1984, supplemented by formal agreement with Kent County Council as the Local Highway Authority, in respect of its powers under the Traffic Management Act 2004. In particular, section 122 of the Road Traffic Regulation 1984 Act imposes a general duty on local authorities exercising functions under the Act to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of safe and adequate parking facilities on and off the highway.

1.4.3 Changes to parking charges should be made via an Amendment Orders to the Council's on and off-street parking Traffic Regulation Orders, using the procedures set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

1.4.4 Part 2 of The Civil Enforcement of Parking Contraventions (England) General (Amendment) Regulations 2015 introduced a statutory requirement for a 10 minute "grace" period to time limited parking, whether on-street or off-street, including Pay and Display, regardless of the intended duration of stay, effectively adding the facility to park for an additional 10 minutes to all parking periods.

1.5 Financial and Value for Money Considerations

1.5.1 Previous reports to this Board and Cabinet have examined parking fees and charges within the context of a set of guiding principles, the cost of parking service to the Council and ongoing investment in the parking management service. It had been anticipated that the recommendations proposed in respect of off-street car parking fees and charges would have generated estimated increased income of £271,000 net of VAT and refunds in a full year. This estimate is based on the pre-Covid 19 usage and refund levels remain constant and that ticket sales remain uninfluenced in each pricing band.

1.5.2 Clearly the Covid 19 pandemic will result in different user patterns in our car parks. The full extent of this impact in the changing habits of users will not be known for some time as businesses and users make changes to the way they move and operate within the Borough.

1.5.3 Some of the proposals will incur additional ongoing revenue costs which have been factored into the relevant budgets where appropriate. Such costs will need be to be taken into account to determine net income associated with one or more of the proposals.

1.5.4 Capital investment will be required in the Council's car parks in Snodland, Martin Square, Aylesford and Tonbridge Castle grounds if the introduction of car parking

charges is approved at a later date. A budget in the sum of £210,000 has been established for this purpose.

1.6 Risk Assessment

1.6.1 The departmental operational risk assessment has been updated substantially and is being revised on an ongoing basis as government guidance on Covid-19 changes.

1.6.2 The regularised review of parking charges is financially considered when reviewing the Council's Medium Term Financial Strategy.

1.7 Equality Impact Assessment

1.7.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.7.2 Blue Badge holders can park free of charge in the Council's car parks for up to 23 hours. For Blue Badge holders living in a parking permit area, a Resident Parking Permit is not required as long as the valid Blue Badge and clock is correctly displayed. The Blue Badge scheme has recently been extended by Central Government to include people with "hidden disabilities". This includes people with learning disabilities, autism and mental health conditions.

1.8 Policy Considerations

1.8.1 Asset Management

1.8.2 Community

Customer Contact

1.9 Recommendations

1.9.1 It is **RECOMMENDED TO CABINET** that it **APPROVE** the following proposals;

1) The revised off-street parking fees and charges as previously agreed by this Board [Annex 1] be progressed and come into effect in April 2021 in line with all relevant legislation.

2) A survey to ascertain user profiles and duration of stay at the Martin Square and Aylesford car parks be undertaken at a point in time when it is deemed that parking has returned to some level of normality following the Covid 19 pandemic.

Background papers:

Nil

contact: Andy Edwards
Robert Styles
Sharon Shelton

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THE TONBRIDGE AND MALLING BOROUGH COUNCIL (OFF-STREET PARKING PLACES) ORDER 2021

Notice is hereby given that Tonbridge & Malling Borough Council intends to make the above Order under Sections 32 and 35 of the Road Traffic Regulation Act 1984, the effect of which will be as per the Council's existing Off-Street Parking Places Order, save for the following changes;

In the town of Tonbridge,

- no increase to the charge for parking for up to 30 minutes, remaining at 70 pence
- an increase of 10 pence per hour on each parking tariff (up to a maximum tariff of £6.70)
- an increase of £20 (to £290) for 12 month off peak car park season tickets
- an increase of £10 (to £120) for monthly car park season tickets
- 3 monthly car park season tickets no longer offered
- 6 monthly car park season tickets no longer offered
- an increase of £70 (to £1020) for 12 month car park season tickets

In the town of West Malling,
High Street car park

- no increase to the charge for parking for up to 30 minutes, remaining at 40 pence
- an increase of 10 pence per hour for parking up to 3 hours
- no increase to the charge for parking for up to 4 hours, remaining at £3.20

Ryarsh Lane car park

- an increase of £80 (to £255) for 12 month car park season tickets

In the town of Borough Green

- no increase to the charge for parking for up to 30 minutes, remaining at 20 pence
- an increase of 10 pence on each further parking tariff, up to a maximum tariff of £5.30

In the village of Blue Bell Hill

- an increase of 20 pence (to £2.70) for daily parking
- an increase of £2.00 (to £12) for weekly parking
- an increase of £5 (to £40) for monthly car park season tickets
- 3 monthly car park season tickets no longer offered
- 6 monthly car park season tickets no longer offered
- an increase of £120 (to £420) for 12 month car park season tickets

Leybourne Lake and Haysden Country Parks

- an increase of 20p (to £1.40) to the "up to 4 hour" tariff
- an increase of £10 (to £50) for 12 month car park season tickets

A copy of the draft Order and a statement of reasons for proposing to make the Order may be inspected during normal working hours at the offices of Tonbridge and Malling Council Offices, Kings Hill, West Malling or Tonbridge Castle and at the Kent County Council Offices, Sessions House, County Hall, Maidstone, Kent.

The proposed Order may also be viewed on www.tmbc.gov.uk/offstreetcharges

Anyone wishing to support these proposals, or object to them, should write stating reasons, and quoting the name of the Order, by no later than XXXX

ANNEX 1

If you have any questions concerning this notice, require further information or have difficulty in reading this notice, please contact, during normal office hours, the Parking Office tel: (01732) 844522, email: parking.office@tmbc.gov.uk or by post to;

The Parking Office, Tonbridge & Malling Borough Council,
Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ.

Dated XXXXXX

Julie Beilby
Chief Executive

For enquires relating to these proposals please contact Tonbridge & Malling Borough Council on 01732 844522.

TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 DRAFT UPDATED AIR QUALITY ACTION PLAN

1.1 Summary

1.1.1 Following a review of the borough's Air Quality Management Areas (AQMAs) at the March meeting of the Board, TMBC will have 6 AQMAs and therefore continue to have a statutory duty to keep updated an Air Quality Action Plan (AQAP) to outline the actions we will take to reduce concentrations of the pollutant of concern in the AQMA's so that they can all eventually be revoked. Working with consultants Bureau Veritas we have identified actions which we propose to take up to 2025 to tackle Nitrogen Dioxide, primarily within the remaining AQMA's, but also across the Borough as a whole. The draft actions table from within the AQAP is presented in **Annex 1** with the full AQAP document presented in **Annex 2**. The Technical Note underpinning this work is also presented in **Annex 3**.

1.2 Background

1.2.1 The Council has a statutory duty under Part IV of the Environment Act 1995 to;

- Monitor air quality within its boundary,
- Declare an Air Quality Management Area (AQMA) where air quality exceeds the relevant standards laid down in law,
- Where an AQMA is declared, prepare an Air Quality Action Plan (AQAP) to demonstrate how it intends to reduce the pollutant causing the exceedance, and;
- Review AQMAs and AQAPs in response to ongoing monitoring.

1.2.2 Following a review of monitoring results within our existing AQMA's and across the Borough as a whole, and the detailed technical work conducted by our consultants Bureau Veritas, members will recall from the March meeting of the Board that several revocations and amendments to the existing AQMA's were proposed and agreed. The proposed actions table within the AQAP presented separately at

Annex 1 therefore reflects the recent changes to the declared AQMA's although due to Covid-19 restrictions and changed priorities those changes have yet to be formalised.

1.2.3 The AQAP is a Statutory Document required to focus solely on actions to tackle the exceedances of air quality objectives which led to the declaration of AQMA's, ultimately as an aid for reducing the health effects of poor air quality. However, the actions proposed will also support the recently agreed Climate Change Strategy which looks at a much broader range of actions to address the effects that all types of pollution are having on our natural environment.

1.3 Draft Updated Air Quality Action Plan

1.3.1 Taking into account the AQMA changes, Bureau Veritias working in conjunction with a steering group made up of Council Officers and representative from the County Council have produced a draft updated AQAP using a DEFRA template as presented in **Annex 2** with the table of proposed actions also shown separately in **Annex 1**. It outlines the actions the Council will take to improve levels of Nitrogen Dioxide within the AQMAs and across the Borough up to 2025. As a consequence of these actions it is anticipated that other pollutants will also be reduced thus aiding the aims of the Climate Change Strategy.

1.3.2 Members will note that some of the proposed actions in **Annex 1** such as an Anti-Idling policy are also contained within the Climate Change Strategy where that document talks about Air Quality. This is not a duplication, but the same policy, which shows an interaction between the two documents.

1.3.3 If approved in principal by members the draft AQAP will move to the next stage which is a statutory external consultation with parties including, DEFRA, The Environment Agency, Neighbouring Local Authorities, KCC, and Local Residents.

1.3.4 Ultimately the document will run in parallel with the Councils Climate Change Strategy and other relevant Policies such as KCC's Energy and Low Emission Strategy.

1.3.5 The proposed actions within the AQAP can be considered under five broad topics;

- Priority 1: Transport
  As source apportionment in Section 3.3 of the Technical Note in **Annex 3** shows, the main source of air pollution causing the declaration of AQMAs across the Borough is associated with road transport emissions. Therefore reducing transport emissions through measures contained within the Action Plan are a key priority.

- Priority 2: Planning and Infrastructure
  The new Local Plan through LP:20 and supporting policies sets out the considerations to be applied when considering development proposals. With

significant housebuilding occurring during the life of this plan, ensuring suitable planning and infrastructure is in place is a key priority.

- Priority 3: Policy Guidance; and
  As outlined in Section 3.2 of **Annex 3**, there are a number of existing and emerging policy/strategy documents which are a key mechanism for reducing emissions across the Borough not least the Climate change Strategy. For effective reductions to be realised, in addition to the measures outlined within the Air Quality Action Plan, all other actions within the referenced documents should be implemented.

- Priority 4: Public Health and Wellbeing
  As highlighted in Section 3.1 of **Annex 3**, the impact of air pollution on public health is known to be highly detrimental. As we know transport is a key pollutant, aside from restricting vehicle usage through the introduction of clean air/low emission zones, the most effective way to achieve a reduction in vehicle numbers is to change the attitudes/behaviour of the population towards travel.

- Priority 5: Air Quality Monitoring
  Currently Nitrogen Dioxide is monitored through a network of 72 passive diffusions tube and two continuous analysers. A Particulate monitor is also being established in Borough Green, with opportunities through the Smart Cities initiative being looked at to create a network of indicative Particulate Monitors, to inform the general public. Monitoring is the best way to continually assess the extent of pollution within Tonbridge and Malling, as well as quantifying improvements that have been achieved through the AQAP, and acting as an evidence base for AQMAs to be amended/revoked. Monitoring will continue in its current extent, with opportunities to move tubes to new areas of concern considered at the start of each calendar year.

1.3.6 The proposed actions drawing on the themes listed in 1.3.5 are shown separately in **Annex 1**. It is anticipated that following statutory consultation this list and its wording may change. However, it should also be noted that whatever actions are in the final plan, it will not prevent new actions which may present themselves during the life of the plan from being taken forward. All actions and priorities within the AQAP can also be seen to sit within the context of the Climate Change Strategy hierarchy.

1.3.7 The challenge ahead will be considerable and will require a combined approach. The Council has already established a Steering Group comprising of representatives from across the different Council departments as well as representatives from the County Council who have significant powers to bring these actions to fruition. Expertise from within this group will assist with progression of the targets within the action plan. We will also need to work closely with other

statutory partners, businesses, community groups and individuals to raise awareness and help to influence change.

1.4 Legal Implications

1.4.1 The Council has a statutory duty to monitor air quality within the Borough but specific pollutants are not described within this requirement. The Council has monitored Nitrogen Dioxide through a network of passive diffusion tubes and continuous monitors since the 1990's in line with this statutory duty.

1.4.2 The Council also has a statutory duty under the Environment Act 1995 to prepare and update AQAPs where AQMAs have been declared and to revoke/amend/declare AQMAs as necessary, which has occurred as detailed in this report.

1.5 Financial and Value for Money Considerations

1.5.1 Air Quality monitoring has an annual budget which due to Covid-19 effects on budgets has been reduced by £1000 this year. However this saving has been achieved through producing our Annual Status Report 'in house' this year and our other Air Quality work has not been affected. There is no budget set aside for the implementation of the Action Plan.

1.5.2 Each action proposed in **Annex 1** was put forward on the basis of a basic cost benefit analysis and the remaining actions were felt to be able to create a meaningful differences to levels of Nitrogen Dioxide both in the AQMA's cited and across the Borough as a whole whilst not costing the Council significant sums to set up/run.

1.5.3 There are regular opportunities to bid for funding from Air Quality projects from difference sources including DEFRA and every opportunity will be made to secure funding from these sources during the life of this AQAP.

1.5.4 It is anticipated that as the aims of the AQAP accord with the aims of the Climate Change Strategy some funding from that budget could also be utilised to help fund proposed actions within the AQAP.

1.6 Risk Assessment

1.6.1 None

1.7 Equality Impact Assessment

1.7.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.8 Policy Considerations

1.8.1 Planning, Air Quality and Climate Change, as detailed in the report and associated Annex.

1.9 Recommendations

1.9.1 That subject to any further amendments from Members, the Draft Amended Air Quality Action Plan as set out in full at **Annex 2**, **BE ENDORSED** with amendments incorporated into a further draft for Cabinet approval and prepared for wider statutory consultation thereafter.

The Director of Planning, Housing and Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers:

Nil

contact: Crispin Kennard
Linda Hibbs

Eleanor Hoyle
Director of Planning, Housing and Environmental Health

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Annex 1 Action Plan Table from AQAP

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
Transport											
1	Establish/Join a Quality Bus Partnership to help upgrade Bus Fleet	Vehicle Fleet Efficiency	Promoting Low Emission Public Transport	TMBC	Bartholomew Wren / Steven Saxbee (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI measured via the % of buses meeting a set EURO standard.	In areas of high bus usage, such as within the Tonbridge High Street AQMA an NO_2 in conjunction with other measures a reduction of between 1 – 3µg/m^3 is to be aimed for.		2021 Yearly grants available so try to apply each year for a grant Related to grants if they are awarded	Establish or extend neighbouring QBP(s) to help drive up the quality and emissions performance of the local bus fleet. Engage with KCC public transport and neighbouring authorities. Pursue funding opportunities from DfT, Defra and elsewhere as appropriate. To make sure cleaner buses are used on all routes, especially those operating through AQMAs.
2	Review Taxi/Private Hire Vehicle Policy and license fees, implement a strategy to encourage a switch to low emission vehicles	Vehicle Fleet Efficiency	Fleet Efficiency and Recognition Schemes	TMBC	Katie Shipman / Anthony Garnet (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI measured via the % of taxis and private hire vehicles meeting a set EURO standard. KPI could also be to have the review completed by a set date.	To be confirmed once full fleet information is available – use of the Emissions Factor Toolkit (EFT) to define NO_x emission reductions for changes within the fleet per annum.		2025 2030	Support the review of taxi licensing policy to include options to reduce the age of vehicles in use, and to complete a review of licensing fees to work towards increasing the uptake of ULEVs. All vehicles to be petrol hybrid Euro 5 or petrol and diesel euro 6 by 2025. By 2030 all vehicles to be zero or ultra low emissions such as electric or liquid petroleum gas
3	**Explore opportunities to reduce emissions from local delivery HGV's/LGV's possibly through the formations of a Freight Quality Partnership**	**Freight and Delivery Management**	**Freight Partnerships for Town Centre Deliveries**	**TMBC**	**Steven Saxbee / Jeremy Whittaker (TMBC)**	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	**KPI measured via the % vehicles meeting a set EURO standard, and/or by the % of business participation in recognition schemes.**	**To be confirmed once fleet information is available – use of the EFT to define NOx emission reductions for changes within a fleet.**		2021 2021	Opportunities for sustainable urban freight deliveries at existing locations and for new developments, can also help promote recognition schemes such as ECO Stars. Through kent Invicta Chamber of Commerce etc and on media / website If Locase is extended past march 2020 then businesses can get grant from KCC up to 40% of costs towards low carbon and greener fuels projects (max £20,000) Advertise this on media / website

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
4	Develop and implement a borough-wide school transport scheme	Promoting Travel Alternatives	School Travel Plans	KCC	Relevant KCC officer/team to lead, Contact at TMBC to be Tamsin Ritchie	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPIs may include the following: % reduction of children travelling to school in cars % of children cycling or walking to school. Number of schools implementing individual school travel plans.	Measure has the potential to have a medium to high impact upon short term NO_2 concentrations close to schools depending on the uptake of the schemes across the borough. On a borough wide scale a lesser impact upon on concentrations would be realised.		2022 2020 2020 2020 2021 Yearly	Walking buses, action to focus on school run drop offs, feasibility of school start time variations. Work closely with KCC in developing these travel plans and feasibility studies. Bike Smart (Tonbridge) Tonbridge schools (secondary) Anti-idling outside school gates. Signs Banners etc Walk to school needs to start organising in Jan for sept role out. Bike to school. Bike Week? dates?
5	Create Anti-idling zone at Tonbridge taxi rank Develop and enforce a borough wide anti-idling campaign	Traffic Management	Anti-Idling Enforcement	TMBC to lead but working closely with KCC Highways team where they have input	At TMBC, Katie Shipman / Anthony Garnet (Tonbridge taxi rank) Steven Saxbee (borough wide)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI measured via an annual review of the number of fixed penalty fines and number of complaints received. After an initial year of results the % change in penalty fines and complaints can be quantified.	Measure is more an awareness raising tool, however it is also a useful measure to prevent vehicles idling and causing congestion in specific locations, which is a significant cause of emissions.		2021 2020	Borough-wide anti idling enforcement at taxi ranks, bus stops, and outside schools etc. Social Media posts to encourage behavioural change. School case study to be chosen
6	Pilot a Car Club within the Council for individuals use in local communities	Promoting Travel Alternatives	Workplace Travel Planning	TMBC	Steven Saxbee / Jeremy Whittaker (TMBC)	Wateringbury, Aylesford, Larkfield	The introduction of pool cars can result in a reduction of approximately 20% in business mileage. KPI relating to usage at the Council can be measurements of reduction in annual mileage undertaken per team.	NO_x emission reduction achieved by the Council will be able to be calculated annually.		2020 2022 2022 2020	Tunbridge Wells Borough Council operate a successful car club, to be contacted for information. Car club campaigns, possibility to include advertising and sponsorship opportunities. Contact Liberty at Kings Hill for setting up round the estate Also advertise Kent Journey share (when covid restrictions lift)
7	Continue to explore traffic improvement options at Wateringbury crossroads, emphasis on looking at capacity and flow	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	KCC	Tim Middleton at KCC (with possible assistance from TMBC Technical Services)	Wateringbury	KPI to be formulated once option has been developed, to be based around vehicle turning counts and/or queuing statistics.	An improvement to the Wateringbury crossroads would aim to reduce NO_2 concentrations by between 1 – 5µg/m^3.		2024	Following the completion of a feasibility study a preferred option will be taken forward within Wateringbury.
8	Encourage companies to allow home working at least one day a week	Other	Via the internet and other mechanisms	TMBC	Jeremy Whittaker / Steven Saxbee (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Yearly surveys to companies for numbers of staff and number of days a week staff work at home	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 5µg/m^3. Based on small uptake		To start in 2020 and be ongoing	To promote on website multimedia and targeted adds campaigns to local office based companies using momentum from for home working from Covid restrictions

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
Planning and Infrastructure											
9	Explore the process for possible standardising Section 106 agreement funding from development for AQ improvements	Policy Guidance and Development Control	Other Policy	TMBC	Steven Saxbee / Emma Keefe (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI may be the total number of Section 106 agreements secure in terms of AQ funding per annum, or the total amount of funding secured per annum.	N/A		ongoing	Standardising the process for securing S106 agreements for AQ to be linked with planning department to ensure harmonious implementation. Conditions to be more specific in planning decisions regarding green energy, low emission vehicle and EV parking (policy compliant).
10	Installation of electric charging points within Council car parks throughout the borough	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	TMBC to lead with input from KCC	Andrew Young (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI should include the number of EV charging points installed within the borough from a baseline year, and the number and % increase per annum.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3 based upon a low to medium uptake.		2025 or sooner	Council car parks, TMBC funded with possible assistance from KCC OLEV could provide funding
11	Installation of green walls and increased vegetation across the borough	Other	Other	TMBC	Tamsin Ritchie /Steven Saxbee (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	The number of green walls / vegetation installed within the borough per annum.	N/A		2021 2021 2024 2021	Investigate areas like Wateringbury where results are close to hourly mean or increasing vegetation can made a difference Look into if grant funding is available To be installed as a physical barrier to increase distances between the road and pedestrians. See if can be done through planning applications
Public Information, Strategies and Policy Guidance											
12	Raise public awareness through the launch of a Travel Choices Campaign	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	TMBC to lead with assistance from KCC (see comments)	Tamsin Ritchie / Steven Saxbee (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Usage statistics for public transport across the borough per annum.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3.		2021 2021	Possibility of partnership with 'Step Ahead of the Rest' KCC Active travel programme. Social Media advertising. Community projects
13	Prepare a new Local Cycling and Walking Infrastructure plan (LCWIP)	Promoting Low Emission Transport	Promotion of cycling	TMBC working closely with KCC	Bartholomew Wren (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	2021	Identify infrastructure improvements to support existing and new communities to walk and cycle more frequently, through the provision of a more joined up route network. Work with partners including KCC Highways and Public Rights of Way.		2021	Identify if there any specific routes that can be improved upon or require the introduction of new routes.

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
13b	Delivery of identified cycling and walking schemes	Promoting Low Emission Transport	Promotion of cycling	KCC	Relevant KCC officer/team	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPIs to include: Usage of rental schemes. Numbers of cycle to work schemes Implementation of new routes per annum. Obtain figures from use of new cycle hub and Tonbridge station	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3 based upon a low to medium uptake.		2021-2030 ongoing ongoing	Following the completion of the LCWIP, the identified cycling and walking routes will be improved / new routes are to be introduced. In addition cycle to work schemes are to be encouraged and supported through local campaigns, events and planning negotiations. Active travel to be promoted in partnership with KCC – Kent Connected. Tie in with 11. Bike Smart Tonbridge. Bike Smart Malling (Wrotham School). Tie in with 11
14	Education and encouragement in terms of air quality across the borough: public workshops, leaflet campaigns, advertising, approaching schools, businesses, community centres	Public Information	Via leaflets and other mechanisms	TMBC	Tamsin Ritchie (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Usage statistics for public transport and zero emission transport options (walking and cycling) across the borough per annum. Most of the individual parts to this measure can be developed immediately, again it may be beneficial to have a KPI relating to implementation time.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3.		2020 2021 Asses if needs to be repeated over 5 years 2021 2021	Available AQ information, current issues, what the council is doing paired with what the public can do as a bottom up approach. Provision of workshops, physical and digital leaflets, drop in sessions, dedicated phone-line etc. Social media visibility is a key element with potential to link to other KES/ELES communications. Community Champions / case studies
15	Implement an improved public transport information platform	Public Information	Via the internet and other mechanisms	KCC		M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Usage statistics for public transport across the borough per annum.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3.		2021 2021 2021	To include links to Kent connected pt and options to download it on website. To include the provision of high quality accessible information on sustainable travel, also the promotion of public transport use to incentivise usage. All available information to be linked to 'smarter cities' initiative.

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Air Quality Action Plan

Tonbridge and Malling Borough Council

January 2020

Document Control Sheet

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Configuration				
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0.1	29/01/20	P Bentley	-	Initial draft

	Name	Job Title	Signature
Prepared By	P Bentley	Senior Consultant	
Approved By	J Clayton	Principal Consultant	

Disclaimer

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Any questions or matters arising from this Report should be addressed in the first instance to the Project Manager.

Tonbridge and Malling Borough Council Air Quality Action Plan

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management

January, 2020

Local Authority Officer	Crispin Kennard & Steven Saxbee
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Report Reference number	Tonbridge and Malling Borough Council AQAP – Initial Draft
Date	January 2020

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Tonbridge and Malling Borough Council up to 2025. This action plan replaces the previous draft action plan[1] which ran from June 2011.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas[2,3].

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion[4]. Tonbridge and Malling Borough Council are committed to reducing the exposure of people within the borough to poor air quality in order to improve health.

We have developed actions that can be considered under four broad priority topics:

- Priority 1: Transport;
- Priority 2: Planning and Infrastructure;
- Priority 3: Policy Guidance; and
- Priority 4: Public Health and Wellbeing

The primary focus of the AQAP is to implement measures which will ensure levels of NO_2 across the borough, and specifically within the existing AQMAs, are consistently below 10% of the annual mean NO_2 Air Quality Strategy (AQS) objective of 40µg/m^3. For two out of the six existing Air Quality Management Areas (AQMAs), a relatively small reduction in annual mean NO_2 concentration is required (3µg/m^3 within AQMA 3 and 3.6µg/m^3 within AQMA 7) to reduce existing concentrations to 36µg/m^3 thus ensuring compliance with the annual mean objective of 40µg/m^3. Where required concentration reductions are relatively low, borough-wide actions / 'soft' measures such as educational events, are more applicable within these AQMAs, compared to additional AQMA / area specific 'hard' measures such as changes in existing road layouts, that are required within the AQMAs that are current showing concentrations of NO_2 significantly in excess of the annual mean objective.

The priorities from the adoption of this action plan are to aid a behavioural shift within the population to promote more sustainable and less polluting methods of transport, reducing dangerous pollutant concentrations and reducing the risks of detrimental effects against health and wellbeing within the borough. In addition where transport remains a majority source of air pollution, traffic measures are to be implemented to reduce congestion and aim to reduce source emissions in areas of relevant exposure.

This AQAP outlines a plan to effectively tackle air quality issues within the Council's control. It should be noted that there are a large number of air quality policy areas that are outside of the Council's influence (such as vehicle emissions standards agreed in Europe), but for which the Council is able to provide useful evidence. The Council will therefore continue to work with regional and central government on policies and issues beyond Tonbridge and Malling's direct influence in relation to air quality.

[1] Tonbridge and Malling Borough Council (June 2011), Draft Air Quality Action Plan
[2] Environmental equity, air quality, socioeconomic status and respiratory health, 2010
[3] Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006
[4] Defra. Abatement cost guidance for valuing changes in air quality, May 2013

Responsibilities and Commitment

This AQAP was prepared by the Environmental Protection department within Tonbridge and Malling Borough Council with support provided by Bureau Veritas. The following officers and departments have, and continue to provide, support and agreement to the AQAP:

List officers/departments involved in the preparation of the AQAP

This AQAP has been approved by:

<Details of high level Council members who have approved the AQAP (This could also include support from County Councils or from Highways England where appropriate) e.g. Head of Transport Planning, Head of Public Health, with e-signature>.

This AQAP will be subject to an annual review, appraisal of progress and reporting to the relevant Council Committee and Defra. Progress each year will be reported to Defra within the Annual Status Report (ASR) due for completion each year and produced by Tonbridge and Malling Borough Council, as part of our statutory LAQM duties.

If you have any comments on this AQAP please send them to the Environmental Protection department at Tonbridge and Malling Borough Council at:

Environmental Protection Team

Tonbridge and Malling Borough Council

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Kings Hill

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1 Introduction

This Air Quality Action Plan (AQAP) outlines the actions that Tonbridge and Malling Borough Council will deliver up to 2025 in order to reduce concentrations of air pollutants (primarily to nitrogen dioxide (NO_2)) within the existing Air Quality Management Areas across the borough, and also across the wider borough area; thereby positively impacting on the health and quality of life of residents within, and visitors to Tonbridge and Malling.

The AQAP has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process. Development of the AQAP has taken place through discussions within a Tonbridge and Malling Borough Council Steering Group led by the Environmental Protection team and supplemented by guidance from Bureau Veritas.

The document is presented as an initial draft and is to be subjected firstly to internal consultation. Following this initial stage of consultation the draft will be subjected to external consultation and therefore will be submitted to the following parties in line with PG(16) guidance[5]:

- Department of Environment, Farming and Rural Affairs (Defra);
- Environment Agency (EA);
- Highways England;
- Tonbridge and Malling Borough Council;
- Kent County Council (KCC);
- Neighbouring local authorities;
- Residents within Tonbridge and Malling, especially within the existing AQMAs; and
- Bodies representing local business interests and other organisations as appropriate.

Once accepted by Defra, and implemented by Tonbridge and Malling this AQAP will be reviewed every five years at the latest. Details of the progress on measures set out within this AQAP will be reported on annually within the Tonbridge and Malling air quality ASR.

[5] Local Air Quality Management Policy Guidance LAQM.PG(16). April 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.

2 Summary of Current Air Quality in Tonbridge and Malling

Currently there are six Air Quality Management Areas (AQMAs) designated within Tonbridge and Malling Borough Council area. All six have been declared in response to exceedances of the NO_2 annual mean objective. Each of the six declared AQMAs incorporate areas that have strategic road links passing through them, with road traffic emissions having previously been identified as the major source of the elevated NO_2 concentrations.

The previous AQAP completed by Tonbridge and Malling[6], dated June 2011, had been developed to include the initial six AQMAs declared (the designation relating to 24-hour PM_{10} concentrations for the M20 AQMA 1 and the Ditton AQMA 2 have since been revoked). The previous AQAP had not been updated to include the declaration, and subsequent amendment of Borough Green AQMA. Therefore the measures outlined within this AQAP have been developed based upon the current designation of AQMAs.

Details of the current AQMAs are provided within Table 2.1 and boundary maps for each of the AQMAs are presented in Appendix A:

Table 2.1 – Tonbridge and Malling Air Quality Management Areas

AQMA Name	Date of Declaration	Location	Description of Area
M20 AQMA 1	May 2001	Larkfield / Ditton	An area along the M20 motorway between the points where it passes below New Hythe Lane, Larkfield to the west and where it crosses Hall Road, Aylesford to the east.
Tonbridge High Street AQMA 3	June 2005	Tonbridge	An area incorporating the High Street between Botany and the High Street/Vale Road roundabout, Tonbridge.
Wateringbury AQMA 4	June 2005	Wateringbury	An area incorporating the Red Hill/Tonbridge Road A26 crossroads in the Parish of Wateringbury.
Aylesford AQMA 5	October 2008 (Amended January 2020)	Aylesford	An area encompassing the junction of the A20 (London Road) with Hall Road and Mills Road.
Larkfield AQMA 6	October 2008 (Amended January 2020)	Larkfield	An area encompassing a section of the A20 (London Road) within Larkfield, including the junction with New Hythe Lane.
Borough Green AQMA 7	April 2013 (Amended January 2020)	Borough Green	An area encompassing the junction of the A25 (Sevenoaks Road) and the A227 (Western Road) within Borough Green.

Tonbridge and Malling operate a large network of passive diffusion tubes, which provide annual mean concentrations of NO_2 at monitoring locations across the borough. During 2018 monitoring was completed at 54 locations, with monitoring completed both within and outside the current AQMA boundaries. The diffusion tubes are exposed in 4-5 week periods, in line with the Defra LAQM Diffusion Tube Monitoring Calendar, and are processed to derive annual mean concentrations as per Defra TG(16) guidance[7]. In addition to the passive diffusion tube monitoring completed within the borough, the automatic monitoring of NO_2 has historically been completed at one location within the Tonbridge High Street AQMA (ZT5). In

[6] Tonbridge and Malling Borough Council, Environment Act 1995 LAQM Draft Air Quality Action Plan, June 2011
[7] Local Air Quality Management Technical Guidance LAQM.TG(16). April 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland

2018 the monitor was relocated close to the Wateringbury AQMA due to the elevated concentrations reported within the AQMA.

Of the 54 NO_2 monitoring locations within the Council area, 21 are located within the current designated AQMAs. A summary of the recent NO_2 monitoring completed within each AQMA is presented in Table 2.2. Further details of all monitoring locations, and subsequent annual mean NO_2 concentrations are available in the latest Annual Status Report (ASR) completed and submitted to Defra each year. All LAQM reports completed by Tonbridge and Malling are available through the Tonbridge and Malling Borough Council website[8].

Table 2.2 – Tonbridge and Malling AQMA NO_2 Monitoring

Site ID	Site Type	Monitoring Type	Annual Mean NO_2 Concentration (µg/m^3)				
			2014	2015	2016	2017	2018
M20 AQMA 1							
TN5	Roadside	Diffusion Tube	-	-	38.1	38.8	34.9
TN7b	Roadside	Diffusion Tube	-	-	38.0	36.7	31.5
TN80a	Roadside	Diffusion Tube	38.8	35.1	34.4	35.4	30.2
TN5a	Roadside	Diffusion Tube	37.1	35.5	34.5	34.1	30.1
TN30	Roadside	Diffusion Tube	28.3	29.3	29.7	26.7	25.5
TN29a	Roadside	Diffusion Tube	24.9	25.4	28.0	25.2	24.1
Tonbridge High Street AQMA 3							
TN35	Urban Centre	Diffusion Tube	**43.2**	36.7	34.6	37.5	36.4
TN44	Urban Centre	Diffusion Tube	**42.0**	**40.1**	**40.5**	38.4	35.2
ZT5	Urban Centre	Automatic Analyser	**46.6**	**45.8**	**46.8**	**49.6**	34.9
TN45, 74, 75	Urban Centre	Diffusion Tube	**42.7**	**41.6**	**40.5**	**42.3**	39.0
TN110	Roadside	Diffusion Tube	-	-	30.1	32.8	28.4
Wateringbury AQMA 4							
TN33	Roadside	Diffusion Tube	**52.7**	**51.9**	**56.4**	**53.6**	**51.9**
TN43	Roadside	Diffusion Tube	38.2	38.2	39.1	38.7	35.7
TN42, 76, 77	Roadside	Diffusion Tube	**64.8**	**63.5**	**64.8**	**61.3**	**58.1**
Aylesford AQMA 5							
TN68	Roadside	Diffusion Tube	31.9	30.8	30.8	31.4	28.3
TN60, 62, 63	Roadside	Diffusion Tube	**45.3**	**44.1**	**44.8**	**44.8**	**41.7**
DF1, 2, 3	Roadside	Diffusion Tube	**-**	**42.6**	**44.3**	**44.1**	**40.1**
Larkfield AQMA 6							
TN57, 58, 59	Roadside	Diffusion Tube	36.5	34.0	33.7	31.4	32.2
DF7, 8, 9	Roadside	Diffusion Tube	-	35.2	**41.8**	35.0	32.8
TN106	Roadside	Diffusion Tube	-	-	**43.9**	**43.2**	**42.0**
Borough Green AQMA 7							
TN70, 72, 73	Roadside	Diffusion Tube	**42.2**	**42.1**	**45.6**	**43.0**	39.6

Notes:
- Exceedances of the NO_2 annual mean objective are presented in **Bold**
- The automatic monitor ZT5 was relocated part way through 2018

It can be seen by the monitoring results presented within Table 2.2 that the number of monitored exceedances of the NO_2 annual mean objective across all current AQMAs has reduced between 2014 (eight) and 2018 (five). In addition, detailed within the latest ASR at

[8] Tonbridge and Malling Borough Council Air Quality – https://www.tmbc.gov.uk/services/environment-and-planning/pollution/air-quality

the time of writing, during 2018, as has been apparent since 2014, there have not been any monitored exceedances outside of the declared AQMAs. Although there has been a visible decline in concentrations, aside from within the M20 AQMA there remains one monitoring location reporting an NO_2 annual mean greater than, or within 10% of the annual mean objective (36.0µg/m^3).

Annual mean concentrations have remained at their highest within the Wateringbury AQMA, with the triplicate diffusion tube monitoring location TN42, 76, 77 reporting the highest concentration within the borough every year since 2014 (58.1µg/m^3 in 2018). As can be seen within Figure A.3, the Wateringbury AQMA consists of a single cross junction between the A26 (Tonbridge Road), Red Hill and Bow Road. The junction is traffic light controlled and congestion is experienced throughout the day due to the A26 linking Maidstone with Tonbridge and also Royal Tunbridge Wells.

There have not been any monitored exceedances of the NO_2 annual mean objective within the M20 AQMA during the previous five years. The maximum monitored concentration recorded during this period was 38.8µg/m^3 recorded at both TN5 in 2017 and TN80a in 2014. Although there has not been any monitored exceedances, the detailed modelling completed as part of the AQMA review[9] attached as Appendix xx predicted that a number of properties located to the north and south of the M20 motorway experience NO_2 annual mean concentrations greater than 36.0µg/m^3. Due to the layout of the M20 motorway, and the adjoining local roads, it has not always been possible to locate diffusion tubes in locations of relevant exposure, e.g. gardens of residential properties at their closest point to the M20 motorway.

In addition to future years monitoring results, any changes made to the existing monitoring network within the borough will be detailed and justified within subsequent ASRs. The monitoring network serves as an ongoing indicator for changing NO_2 trends within the borough, and will be essential for the assessment of implementation for the measures detailed within this AQAP. The monitoring network also provides an initial evidence base for consideration of the requirement to revoke, amend or declare any AQMAs.

[9] Bureau Veritas (November 2019), Tonbridge and Malling Borough Council Air Quality Management Area Review

3 Tonbridge and Malling's Air Quality Priorities

This chapter presents the main drivers, and the approach taken by Tonbridge and Malling for the development and subsequent selection of measures that have been included within this AQAP. Included within this section of the AQAP are descriptions of the existing strategies and policies that relate to air quality within the borough.

A source apportionment study has been completed across the borough, focusing on each of the existing six AQMAs and surrounding area. The source apportionment study has allowed the most significant vehicular NO_x contributors to be identified, and in conjunction with the strategies and policies that are currently in place, the conclusions have been used to identify and prioritise the action measures presented within Section 5.

3.1 Public Health Context

Scientific evidence has continued to show the scale of the negative impact of poor ambient air quality on health. Although the links between air pollution as a direct cause of death are still the subject of much debate, poor air quality is considered to be a significant contributory factor to the loss of life, with an average estimation of lives being shortened by five months. The Committee on the Medical Effects of Air Pollution (COMEAP)[10] provides advice to Government on the setting of air quality standards, and increasingly has sought to consolidate evidence on the health burden and impacts of various pollutants, both in single occurrence and pollutants in combination. In terms of NO_2, COMEAP provide a current range of estimate for annual mortality burden for human-made air pollution in the UK is estimated to be between 28,000 and 36,000 deaths and an associated loss of population life of 328,000 and 416,000 life years lost[11].

Local authorities across England have a central role in achieving improvements in air quality, and have a range of powers which can effectively help to improve air quality. The involvement of public health officials is crucial in playing a role to assess the public health impacts and providing advice and guidance on taking appropriate action to reduce exposure and improve the health of everyone in Tonbridge and Malling.

The online Public Health Outcomes Framework (England) tool[12] provides further impetus to join up action between the various local authority departments that all contribute towards the delivery of air quality improvements. There is extensive evidence about the health impacts of air pollution, growing media and public interest and an indicator on mortality attributed to airborne particulate matter in the Public Health Outcomes Framework. The Public Health briefing document published by Defra and Public Health England (PHE)[13] provides guidance as to the latest information to consider in terms of the health response to air pollution, guiding local authorities to use existing tools to appraise the scale of the air pollution issue in its area. The briefing document, as part of a resource park for public health teams, advises local authorities how to appropriately prioritise air quality alongside other public health priorities to ensure that it is provided relevant exposure within local agenda.

The briefing document comprises the following key guides:

- Getting to grips with air pollution – the latest evidence and techniques;

[10] The Committee on the Medical Effects of Air Pollution – https://www.gov.uk/government/groups/committee-on-the-medical-effects-of-air-pollutants-comeap
[11] The Committee on the Medical Effects of Air Pollution (2018), Associates of long-term average concentrations of nitrogen dioxide with mortality
[12] Public Health England, Public Health Outcomes Framework – https://fingertips.phe.org.uk/profile/public-health-outcomes-framework
[13] Department for Environment, Food and Rural Affairs and Public Health England (March 2017), Air Quality: A Briefing for Directors of Public Health

- Understanding air pollution in your area;
- Engaging local decision-makers about air pollution;
- Communicating with the public during air pollution episodes;
- Communicating with the public on the long term impacts of air pollution; and
- Air Pollution: an emerging public health issue: Briefing for elected members.

As stated above, the Public Health Outcomes Framework tool includes an indicator on mortality attributed to airborne particulate matter. It should be noted that the indicator only accounts for one pollutant (particulate matter with an aerodynamic diameter of 2.5µm or less – $PM_{2.5}$) for which stronger scientific evidence on links with detrimental health effects and mortality exist, and not for NO_2, for which the six current AQMAs within Tonbridge and Malling are declared. For $PM_{2.5}$ evidence continues to show that there is no real safe threshold for this pollutant and UK government should achieve reductions in levels of $PM_{2.5}$ as low as reasonably practicable below the current air quality standard.

For Tonbridge and Malling in 2017, the fraction of mortality attributable to particulate $PM_{2.5}$ air pollution is 5.7%, which is higher than the national average of 5.1%. The borough is currently under no obligation to monitor $PM_{2.5}$, which is a focus at national level, but anticipates that some of the measures implemented within this action plan for the achievement of reductions in NO_2, will have co-benefits in additionally reducing concentrations of particulate matter. Furthermore, following on from a review of research into the death burden associated with the air pollution mixture rather than single pollutants acting independently, COMEAP are currently reviewing the ability to link deaths to one specific pollutant.

At a County level the Kent Joint Health and Wellbeing Strategy[14], which has been extended to 2021 provides strategic direction to address the numerous health and wellbeing issues facing the population within Kent. It is identified within the strategy that a number of factors affecting short and long term physical and mental health such as air quality need to be considered. Through an integrated approach, with continual links with local authorities feeding into the strategy, the overall vision of improving health and wellbeing outcomes.

The Kent Public Health Observatory last provided an update in terms of mortality rates attributable to air pollution in April 2018[15]. Within which air pollution (particulate matter) is a contributory factor in fewer deaths per year in the population (under 75) in Kent than cancer and cardiovascular disease, however it is linked with a similar number of deaths as is attributed to respiratory disease and liver disease.

3.2 Planning and Policy Context

This Action Plan outlines the Council's plan to effectively tackle air quality issues within its control; however, it is recognised there are numerous existing, and also impending policies and strategies adopted at local, regional and national level that can exert significant effects, both positive and negative, on air quality across Tonbridge and Malling. It is important that these plans and strategies are identified, and taken into consideration at an early stage of the development of the plan. These will aid the establishment of the context in which specific options for improving air quality can be implemented.

Whilst certain policies and / or strategies may be outside of the influence of Tonbridge Malling, there are a number of related policies and strategies at local and regional levels that can be tied directly with the aims of this AQAP. Some of these are directly focused on air quality improvements within Tonbridge and Malling, whilst others relate to transportation issues and therefore are likely to help contribute to overall improvements in air quality across Tonbridge and Malling.

[14] Kent County Council (2013), Kent Joint Health and Wellbeing Strategy: Outcomes for Kent
[15] Kent Public Health Observatory (April 2018), Air Quality

The review of these strategies and policies also assist in not duplicating the work within the AQAP, but instead focus on direct measures outside those considered within the already developed strategies and policies, but that still contribute toward their overall aims. This section outlines the strategies and policies that have the most significant potential to impact on pollutant concentrations within Tonbridge and Malling. Given their importance, the majority of measures listed below have been included as action measures within this Action Plan.

The most relevant policies and strategic documents are detailed below.

3.2.1 Clean Air Strategy 2019

The Clean Air Strategy[16] has been published to set out the case for action at a national level, identifying a number of sources of air pollution within the UK including road transportation, that is relevant in terms of the AQMAs currently present within Tonbridge and Malling, and sets out the actions required to reduce the impact upon air quality from these sources. It has been developed in conjunction with three other UK Government Strategies; the Industrial Strategy, the Clean Growth Strategy, and the 25 Year Environment Plan

Key actions that are detailed within the strategy aimed at reducing emissions from transportation sources include the following:

- The publication of the Road to Zero strategy which sets out plans to send the sale of new conventional petrol and diesel cars and vans by 2040;
- New legislation to compel vehicle manufacturers to recall vehicles and non-road mobile machinery for any failures in emission control systems, and to take effective action against tampering with vehicle emissions control systems;
- Develop new standards for tyres and brakes to reduce toxic non-exhaust particulate emissions from vehicles;
- The encouragement of the cleanest modes of transport for freight and passengers; and
- Permitting approaches for the reduction of emissions from non-road mobile machinery, especially in urban areas.

3.2.2 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations

Published in July 2017, the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (Detailed Plan)[17] is the UK governments plan for bringing concentrations of NO_2 within statutory limits within the shortest possible time. It is identified that the most immediate air quality challenge within the UK is tackling the issue of NO_2 concentrations close to roads, especially within towns and cities. The plan identifies a number of local authorities that were required to complete feasibility studies to define NO_2 concentrations on road links identified by the national Pollutant Climate Mapping (PCM) model as being in exceedance of the NO_2 annual mean AQS objective.

Tonbridge and Malling were not one of these authorities identified, but regardless the UK Plan provides a high level of detail on possible solutions, and their implementation, to reduce NO_x emissions from vehicles, and therefore lower NO_2 concentrations. The actions detailed within the UK Plan include the following:

- Implementation of Clean Air Zones (CAZs);

[16] Department for Environment, Food and Rural Affairs (2019), Clean Air Strategy
[17] Department for Environment, Food and Rural Affairs, Department for Transport (2017), UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (Detailed Plan)

- New real world driving emissions requirements for light passenger and commercial vehicles;
- Additional funding to accelerate the uptake of low emissions buses and also for the retrofitting of older buses;
- Additional funding to accelerate the uptake of hydrogen vehicles and associated infrastructure;
- New mandatory emissions standards for non-road mobile machinery; and
- Local cycling and walking investment plans.

3.2.3 Kent Environment Strategy / Energy and Low Emission Strategy

The Kent Environment Strategy (KES)[18] that was adopted in 2016, and the Energy and Low Emission Strategy (ELES)[19] (currently at consultation stage) which is a sub strategy of the KES have been developed to address the challenges posed across Kent through the growth and change that is predicted to occur across the County over the coming years / decades. Economic growth is welcomed within the County, but this should be realised without impacting the health and wellbeing of its residents, and also without impacting the diverse landscape across the County that is valued by residents, businesses and visitors alike.

Air quality is identified within the KES as a key issue within the County, the unique position of Kent between London and the continent leads to challenges with emissions from cross-channel freight and traffic leading to the declaration of over 40 AQMAs. Transport is identified as a majority emission source leading to associated risks for air quality, with sustainability and a shift to active travel detailed as a requirement for transport growth. In a wider sense the KES has three core themes that are applicable to the strategy and also are drawn down into the ELES:

- Theme One: Building the Foundations for Delivery;
- Theme Two: Making best use of existing resources, avoiding or minimising negative impacts; and
- Theme Three: Toward a sustainable future.

The purpose of the ELES is to identify an approach to deliver clean growth, by reducing emissions from housing, industry and transport to lead to improvements in air quality across the County. The challenge of tackling the AQMA hot-spots of poor air quality is outlined as a major challenge to be overcome at a County level, and also at a local authority level due to the majority of declared AQMAs being designated of local authority controlled road links. In terms of vehicle emissions, growth without gridlock is promoted to deliver safe and effective transport, ensuring that communities and businesses benefit, the environment is enhanced and economic growth is supported.

A drive towards a low carbon economy is included within the ELES, with five themes identified:

- Low Carbon Heating;
- Energy Saving and Efficiency;
- Renewable Generation;
- Smart Energy System; and
- Transport Revolution.

[18] Kent County Council (March 2016), Kent Environment Strategy: A Strategy for Environment, Health and Economy
[19] Kent County Council (2019), Kent and Medway Energy and Low Emissions Strategy: Supporting Delivery of the Kent Environment Strategy (Consultation Draft)

All of the above have the potential to help lower pollutant concentrations across Tonbridge and Malling, and the wider County. Of significant importance is the Transport Revolution which promotes EV charging and a hydrogen fuelling infrastructure, compressed natural gas (CNG) fuelling and the modernisation of the energy infrastructure within ports.

3.2.4 Local Plan

The new Tonbridge and Malling Local Plan[20] has been consulted upon and is currently at the examination stage. Once adopted, the Local Plan will form part of the Development Plan and will replace the current suite of adopted local plans. Due to the advanced stage of the Local Plan in terms of adoption the policies held within the plan have been detailed within this AQAP, if the relevant policies change significantly prior to the adoption of the plan the AQAP will be updated to reflect these. A large number of documents have been used to shape the Local Plan, one of which was an Air Quality Assessment[21] that was completed to provide an evidence base for the potential air quality impacts of the Local Plan upon human health receptors (residential properties, hospitals and schools).

The Local Plan represents the starting point for decision taking on planning applications, it includes a suite of policies with the purpose to manage and facilitate sustainable development across the borough. In addition there are areas within the borough that are identified in terms of future housing allocations (LP25: Housing Allocations). The areas that are identified within the housing allocations are important as these may be close to areas of poor air quality, or will have the potential to impact upon existing air quality conditions.

In terms of air quality and future development, compliance with LP20: Air Quality within the application is required, with the identification of detailed mitigation measures to be included with the Environmental Health department having regard to the relevant air quality standards at a national level. Policy LP20: Air Quality states the following:

1. Development, either individually or cumulatively with other proposals or existing uses in the vicinity, that could directly or indirectly result in material additional air pollutants and a significant worsening of levels of air quality within the area surrounding the development site will not be permitted unless evidenced, specifically identified and detailed measures to offset or mitigate those impacts are introduced as part of the proposal.
2. Development that would introduce new receptors into an area of poor air quality will not be permitted unless the proposals incorporate acceptable measures to ensure receptors would not be subject to unacceptable risk as a result of poor air quality.

In addition to policy LP20, there are several policies within the Local Plan that are aimed at mitigating the impacts of developments upon air quality. These include LP23: Sustainable Transport, and the policies for strategic sites which seek to maximise opportunities for additional cycling and walking routes. A number of identified Strategic Sites (LP28: South Aylesford, LP29: Borough Green, LP31: South-West Tonbridge) bring opportunities to improve the air quality of the nearby AQMAs through the development of relief roads alleviating the traffic flow through the areas of concern. But this earmarked development also brings a risk of detrimental effects upon air quality with the increase of traffic flow in the immediate and surrounding area. Throughout the development of any of the Strategic Sites, or any other development within the borough the Environmental Protection team will review applications received to ensure that all applications are completed in accordance with LP20.

[20] Tonbridge and Malling Borough Council (January 2019), Local Plan – Regulation 22 Submission
[21] Mott MacDonald (June 2018), Tonbridge and Malling Borough Council Local Plan Air Quality Evidence Base

3.2.5 Local Transport Plan

The Kent County Council Local Transport Plan[22] was approved in 2016 setting out a vision for transport over a 15 year timeframe and has the ambition to deliver safe and effective transport, ensuring that all of Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported. This ambition is to be achieved through five overarching policies, of which three have immediate relevance to improving air quality conditions:

- Outcome 3: Safer travel;
- Outcome 4: Enhanced environment; and
- Outcome 5: Better health and wellbeing.

When assessing any transport schemes air quality impacts are to be taken into account in addition to the consideration of the relocation of traffic, ranging from a strong negative impact to a strong positive impact. It is identified that the reduction of vehicle numbers will lead to a positive effect upon local air quality, with Active Travel methods such as walking or cycling promoted as a means of transport rather than just for leisure purposes. Through this links are made to the Active Travel Strategy and Cycling Strategies.

The transport priorities detailed within the Transport Plan that are relevant to Tonbridge and Malling are as follows:

- M20 Junctions 3 – 5 'smart' (managed) motorway system;
- A20 corridor improvements between A228 and M20 Junction 5;
- A228 corridor improvements;
- Borough Green Relief Road;
- Wateringbury A26 / B2015 junction improvements;
- Implementation of the Tonbridge and Malling Cycling Strategy; and
- Improvements within Tonbridge:
    - Tackling congestion in Tonbridge town;
    - Tonbridge town centre regeneration; and
    - Potential for Urban Traffic Control (traffic signal coordination) in Tonbridge to help alleviate congestion and improve air quality.

All of the above have the potential to impact air quality conditions within the existing AQMAs, and across the wider borough. The Environmental Protection team at Tonbridge and Malling will continue to the work in unison with our colleagues in the Highway teams at both Tonbridge and Malling and Kent County Council to ensure that the impacts upon air quality due to the implementation of any highways scheme is quantified in terms of pollutant emissions, and that our expertise within the field is sought when future schemes are develop within Tonbridge and Malling.

3.2.6 Freight Action Plan

The Kent County Council Freight Action Plan for Kent[23] identifies that when road freight vehicles travel on the local road network they can have an adverse impact on local communities in a number of ways, one of which being the impact upon local air quality conditions. It is a supporting policy to the Local Transport Plan detailed above and has three

[22] Kent County Council, Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031
[23] Kent County Council, Freight Action Plan for Kent

core actions detailed within. In terms of air quality issues have been identified in a number of areas:

- Direct tailpipe emissions from the freight passing through the County and also from increased congestion due to Operation Stack whereby vehicles are diverted from the M20 to the A20 when congestion for the Euro Tunnel and Port of Dover reach certain levels;
- Refrigeration and in-cab heaters running when freight are parked through the night, contributing to air pollution within the local area; and
- Implementation of vehicle restrictions within Towns and Villages to restrict the type and / or the number of vehicles that are allowed to pass through certain settlements.

Initiatives such as an ECO Stars scheme can be set up to improve efficiency within a fleet of freight vehicles, this is realised through improvements in fuel consumption and reducing any possible impacts upon local air quality conditions.

3.2.7 Climate Change Strategy

The Tonbridge and Malling Climate Change Strategy (2008 – 2011)[24] detailed the climate issues being faced within the borough, and the role that Tonbridge and Malling Borough Council had in the response to the challenges posed by climate change. With the main themes of the strategy being:

- Housing and Energy Conservation;
- Transportation and Air Quality;
- Sustainable Development and Sustainability within Tonbridge and Malling Borough Council;
- Waste Minimisation and Recycling;
- Community and Business Engagement; and
- Adapting to Climate Change.

In terms of air quality, it was identified that there is a close relationship between air quality and climate change pollutants emitted from transportation sources. Working to reduce the reliance upon personal travel and vehicle trips has two-fold benefits in reducing both local air pollutants and climate pollutants.

Further to the above a climate emergency has been declared by Tonbridge and Malling Borough Council with an aspiration for the borough to become carbon neutral by 2030, 20 years sooner than what Kent County Council have initially agree to. As part of the declaration a drive for electric vehicle charging points is identified, this is to ensure that Tonbridge and Malling is one of the most welcoming places in the country for driving electric and hybrid vehicles.

3.2.8 Cycling Strategy

The Tonbridge and Malling Cycling Strategy (2014 – 2019)[25] provided a core collection of principals and actions to promote cycling and the development of cycling facilities across the borough. It was identified that an increase in cycling has a number of positive benefits, with one of which being an improvement in air quality within urban areas through a reduction in traffic congestion.

[24] Tonbridge and Malling Borough Council (2008), Tonbridge and Malling Climate Change Strategy
[25] Kent County Council, Sustrans and Tonbridge and Malling Borough Council (2014), Tonbridge and Malling Cycling Strategy 2014 – 2019

The aim of the Cycling Strategy was to increase the number people in within Tonbridge and Malling using cycling as a frequently used travel option. The strategy considered improvements to the network in terms of new cycle routes, improved infrastructure and also influencing attitudes to cycling to shift behavioural responses. The key features to deliver step change are associated with improving and expanding the existing cycling infrastructure, providing cycle safety training within schools and the workplace, promoting and marketing cycle usage and running events to raise cycling profile.

An increase in cycling will ultimately help achieve Tonbridge and Malling's vision for improved air quality conditions by reducing congestion on the roads, therefore reducing NO_x vehicle emissions and subsequent NO_2 concentrations.

3.3 Source Apportionment

Source apportionment is the process by which different pollutant sources to relation to existing ambient concentrations are quantified. The AQAP measures presented within this Plan are intended to be targeted towards the predominant sources of emissions within Tonbridge and Malling.

The source apportionment process has been completed in order to:

- Quantify the proportions of NO_x that are attributable to both background emissions and to local road emissions;
- Determination of the relative contributions from different vehicle types (cars, Heavy Good Vehicles (HGVs), Light Goods Vehicles (LGVs), buses and coaches, and motorcycles); and
- Identification of whether action plan measures would need to be on a local / regional / national scale to have a significant impact upon reducing NO_x emissions within the existing AQMA areas.

A source apportionment exercise has been carried out using the ADMS-roads (Version 4.1.1) dispersion model to identify and assess the emission profile of vehicles within Tonbridge and Malling based upon the traffic data and receptors detailed within the AQMA review[9]. To complete this exercise, NO_x and NO_2 concentrations have been predicted at a number of receptor locations within, and close to each AQMA. The source apportionment studies have been undertaken to identify which vehicle type(s) represent the most significant source of NO_x pollution within all existing AQMA's, in addition to a borough wide exercise that encompasses all of the existing AQMAs.

Emission sources of NO_2 are dominated by a combination of direct NO_2 (f-NO_2) and oxides of nitrogen (NO_x), the latter of which is chemically unstable and rapidly oxidised upon release to form NO_2. The NO_x, once emitted from vehicles undergoes a number of chemical reactions and disperses to form the NO_2 concentrations that are measured at roadside monitoring locations. Reducing levels of NO_x emissions therefore reduces levels of NO_2. As a consequence, the source apportionment study has considered the emissions of NO_x which are assumed to be representative of the main sources of NO_2.

3.3.1 M20 Air Quality Management Area (1)

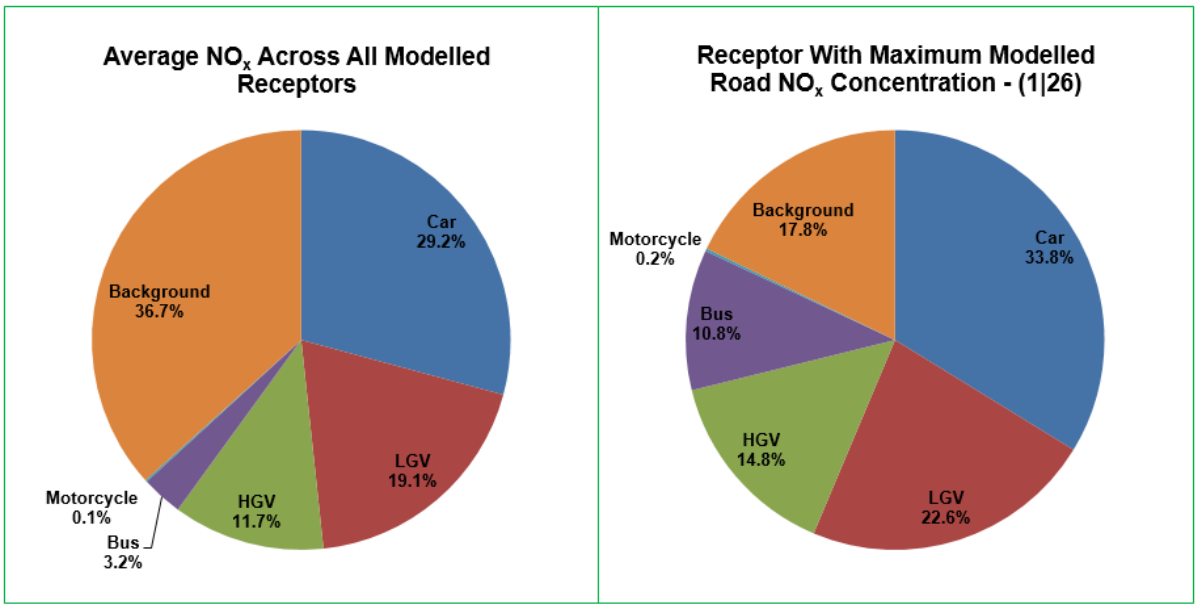
For the M20 AQMA, of the 39 modelled receptor locations, exceedances of the annual mean NO_2 objective have been predicted at nine receptors, and one further receptor had an annual mean predicted to be within 10% of the objective. As detailed below in Table 3.1 and Figure 3.1, the results of the source apportionment exercise present that across all modelled receptors the vehicular proportion of NO_x concentration is 63.3%, and this increases to 82.2% at the receptor with the maximum modelled concentration. Across both source

apportionment scenarios, the proportion of vehicular sources ranks high to low through cars, LGVs, HGVs, bus and coaches, and motorcycles.

Table 3.1 – Source Apportionment: M20 Air Quality Management Area

Metric	All Vehicles	Car	LGV	HGV	Bus & Coach	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration ($\mu g/m^3$)	37.2	17.2	11.2	6.9	1.9	0.1	21.5
Percentage of Total NO_x	63.3%	29.2%	19.1%	11.7%	3.2%	0.1%	36.7%
Percentage Contribution to Road NO_x	100.0%	46.1%	30.1%	18.5%	5.0%	0.2%	-
Receptor With Maximum Modelled Road NO_x Concentration (1|26)							
NO_x Concentration ($\mu g/m^3$)	102.2	42.0	28.1	18.4	13.5	0.3	22.2
Percentage of Total NO_x	82.2%	33.8%	22.6%	14.8%	10.8%	0.2%	17.8%
Percentage Contribution to Road NO_x	100.0%	41.1%	27.5%	18.0%	13.2%	0.3%	-

Figure 3.1 – Source Apportionment: M20 Air Quality Management Area



3.3.2 Tonbridge High Street Air Quality Management Area (3)

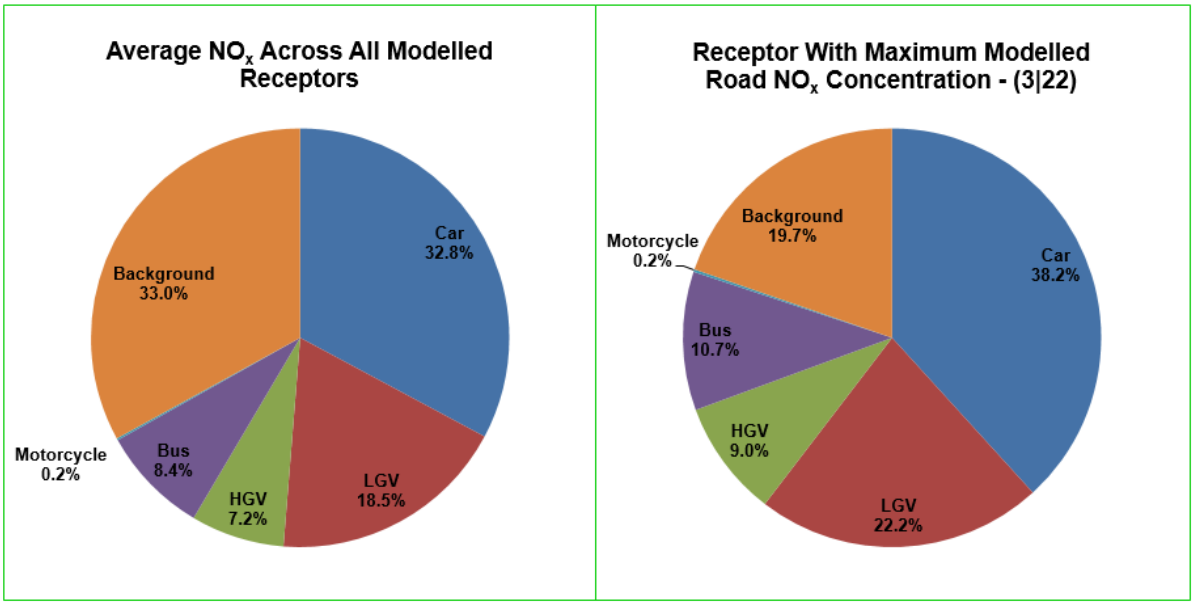
For the Tonbridge High Street AQMA, of the 28 modelled receptors there were no exceedances of the annual mean NO_2 objective predicted within the AQMA, however the most recent monitoring concentrations published within the 2018 ASR presented locations with annual means within 10% of the objective. As detailed below in Table 3.2 and Figure 3.2, the results of the source apportionment exercise present that across all modelled receptors the vehicular proportion of NO_x concentration is 67.0%, and this increases to 80.3% at the receptor with the maximum modelled concentration. Across both source apportionment scenarios, the proportion of vehicular sources ranks high to low through cars, LGVs, bus and coaches, HGVs, and motorcycles.

There is less of a proportion of HGVs compared to buses and coaches across both assessment scenarios. Tonbridge High Street would not be a through-fare route taken by HGVs, only service vehicles requiring to enter this area would travel along the High Street. In contrast there are a number of bus stops located along the length of the High Street with a number of different services travelling along this stretch.

Table 3.2 – Source Apportionment: Tonbridge High Street Air Quality Management Area

Metric	All Vehicles	Car	LGV	HGV	Bus & Coach	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration ($\mu g/m^3$)	32.2	15.8	8.9	3.5	4.0	0.1	15.9
Percentage of Total NO_x	67.0%	32.8%	18.5%	7.2%	8.4%	0.2%	33.0%
Percentage Contribution to Road NO_x	100.0%	49.0%	27.5%	10.8%	12.5%	0.2%	-
Receptor With Maximum Modelled Road NO_x Concentration (3|22)							
NO_x Concentration ($\mu g/m^3$)	62.4	29.7	17.2	7.0	8.3	0.2	15.3
Percentage of Total NO_x	80.3%	38.2%	22.2%	9.0%	10.7%	0.2%	19.7%
Percentage Contribution to Road NO_x	100.0%	47.6%	27.6%	11.2%	13.3%	0.3%	-

Figure 3.2 – Source Apportionment: Tonbridge High Street Air Quality Management Area



3.3.3 Wateringbury Air Quality Management Area (4)

For the Wateringbury AQMA, of the 23 modelled receptor locations, an exceedance of the annual mean NO_2 objective has been predicted at one receptor within the existing AQMA, and a further receptor located close to the boundary of the AQMA had annual mean concentration predicted to be within 10% of the objective. As detailed below in Table 3.3 and

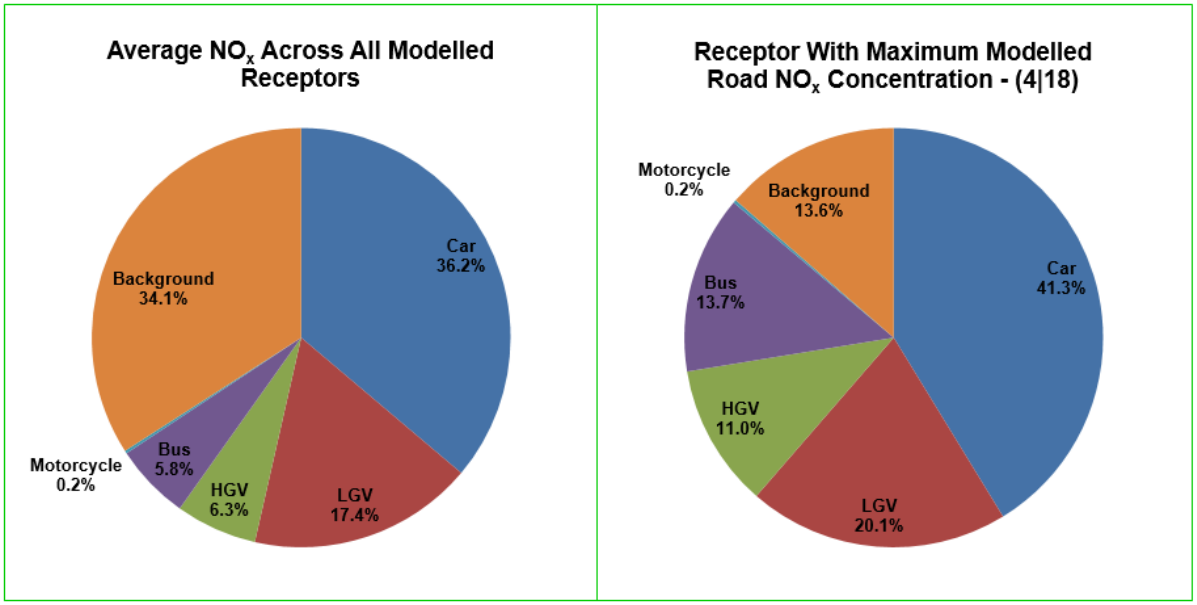
Figure 3.3, the results of the source apportionment exercise present that across all modelled receptors the vehicular proportion of NO_x concentration is 65.9%, and this increases to 86.4% at the receptor with the maximum modelled concentration. For the average of all modelled receptors, the proportion of vehicular sources ranks high to low through cars, LGVs, HGVs, bus and coaches, and motorcycles. But for the maximum NO_x concentration receptor the proportion from buses and coaches is greater than for HGVs.

Both the highest monitored and highest modelled concentrations are within the Wateringbury AQAMA. The AQMA is very small in size and is due to traffic congestion at a single cross-junction at the centre of Wateringbury. This can be seen with the high proportion of NO_x concentration from cars (41.3% at the receptor with the maximum NO_x concentration), this is the highest singular vehicle proportion across all existing AQMAs.

Table 3.3 – Source Apportionment: Wateringbury Air Quality Management Area

Metric	All Vehicles	Car	LGV	HGV	Bus & Coach	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration ($\mu g/m^3$)	27.3	15.0	7.2	2.6	2.4	0.1	14.1
Percentage of Total NO_x	65.9%	36.2%	17.4%	6.3%	5.8%	0.2%	34.1%
Percentage Contribution to Road NO_x	100.0%	54.9%	26.4%	9.5%	8.9%	0.3%	-
Receptor With Maximum Modelled Road NO_x Concentration (4|18)							
NO_x Concentration ($\mu g/m^3$)	89.9	43.0	21.0	11.5	14.3	0.2	14.2
Percentage of Total NO_x	86.4%	41.3%	20.1%	11.0%	13.7%	0.2%	13.6%
Percentage Contribution to Road NO_x	100.0%	47.8%	23.3%	12.8%	15.9%	0.3%	-

Figure 3.3 – Source Apportionment: Wateringbury Air Quality Management Area



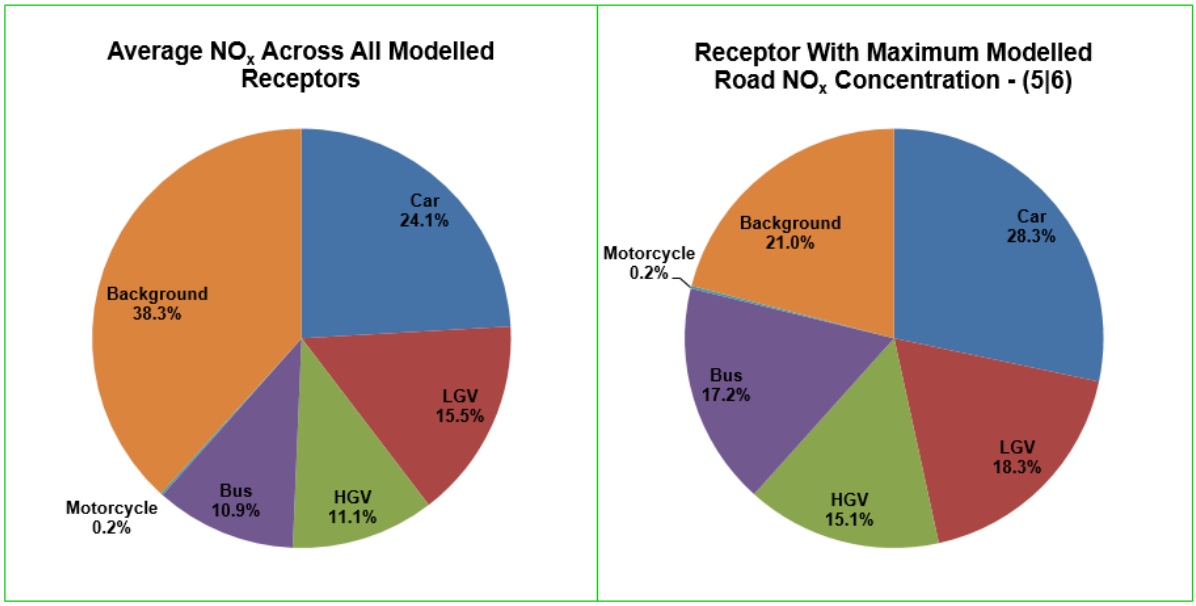
3.3.4 Aylesford Air Quality Management Area (5)

For the Aylesford AQMA, of the 16 modelled receptor locations, there was one predicted exceedance of the annual mean NO_2 objective, and one additional receptor predicted to be within 10% of the objective. As detailed below in Table 3.4 and Figure 3.4, the results of the source apportionment exercise present that across all modelled receptors the vehicular proportion of NO_x concentration is 61.7%, and this increases to 79.0% at the receptor with the maximum modelled concentration. For the average of all modelled receptors, the proportion of vehicular sources ranks high to low through cars, LGVs, HGVs, bus and coaches, and motorcycles. But for the maximum NO_x concentration receptor the proportion from buses and coaches is greater than for HGVs.

Table 3.4 – Source Apportionment: Aylesford Air Quality Management Area

Metric	All Vehicles	Car	LGV	HGV	Bus & Coach	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration ($\mu g/m^3$)	31.3	12.2	7.9	5.6	5.5	0.1	19.4
Percentage of Total NO_x	61.7%	24.1%	15.5%	11.1%	10.9%	0.2%	38.3%
Percentage Contribution to Road NO_x	100.0%	39.0%	25.1%	17.9%	17.6%	0.3%	-
Receptor With Maximum Modelled Road NO_x Concentration (5|6)							
NO_x Concentration ($\mu g/m^3$)	72.6	26.0	16.8	13.9	15.8	0.2	19.3
Percentage of Total NO_x	79.0%	28.3%	18.3%	15.1%	17.2%	0.2%	21.0%
Percentage Contribution to Road NO_x	100.0%	35.8%	23.1%	19.1%	21.7%	0.3%	-

Figure 3.4 – Source Apportionment: Aylesford Air Quality Management Area



3.3.5 Larkfield Air Quality Management Area (6)

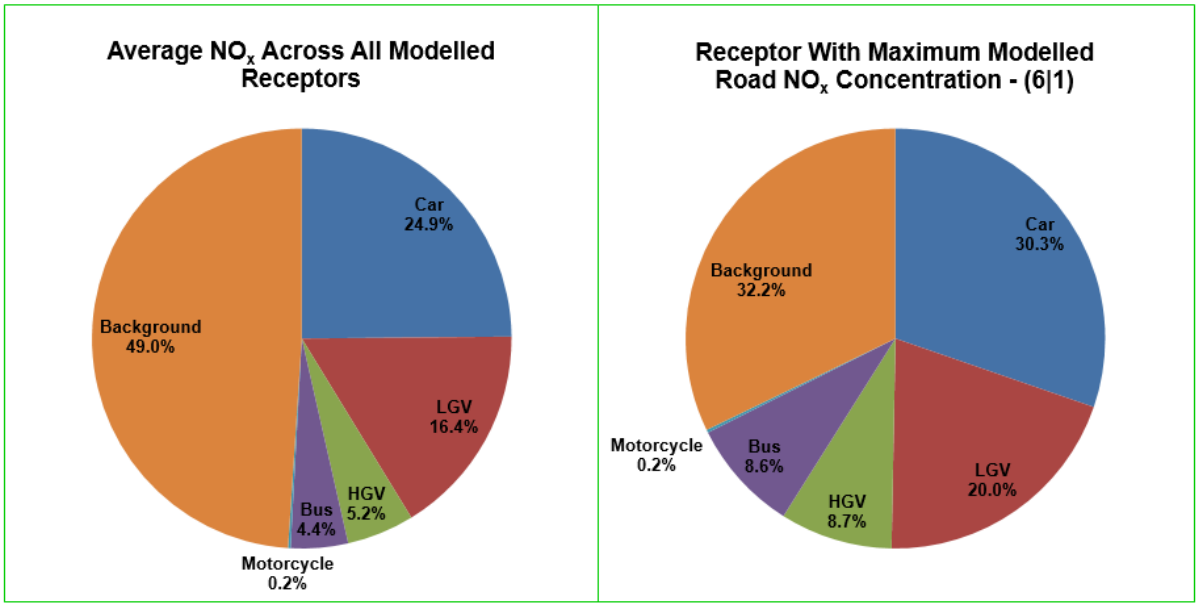
For the Larkfield AQMA, there continues to be a monitoring location (TN106) that exceeds the NO_2 annual mean objective but there were no receptor locations predicted to exceed the objective. As detailed below in Table 3.5 and Figure 3.5, the results of the source apportionment exercise present that across all modelled receptors the vehicular proportion of NO_x concentration is 51.0%, and this increases to 67.8% at the receptor with the maximum modelled concentration. Across both source apportionment scenarios, the proportion of vehicular sources ranks high to low through cars, LGVs, HGVs, bus and coaches, and motorcycles.

The proportion of NO_x concentration from background sources is higher within the Larkfield AQMA than for any other AQMA across both source apportionment scenarios. For all modelled receptors the proportions of vehicular sources and background sources are almost even (51.0% and 49.0%), background sources reduces to 32.2% at the maximum NO_x concentration receptor but this remains the highest proportion of background for these scenario across all of the AQMAs.

Table 3.5 – Source Apportionment: Larkfield Air Quality Management Area

Metric	All Vehicles	Car	LGV	HGV	Bus & Coach	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration ($\mu g/m^3$)	20.8	10.1	6.7	2.1	1.8	0.1	19.9
Percentage of Total NO_x	51.0%	24.9%	16.4%	5.2%	4.4%	0.2%	49.0%
Percentage Contribution to Road NO_x	100.0%	48.7%	32.1%	10.2%	8.6%	0.4%	-
Receptor With Maximum Modelled Road NO_x Concentration (6|1)							
NO_x Concentration ($\mu g/m^3$)	41.6	18.6	12.3	5.3	5.3	0.1	19.7
Percentage of Total NO_x	67.8%	30.3%	20.0%	8.7%	8.6%	0.2%	32.2%
Percentage Contribution to Road NO_x	100.0%	44.7%	29.5%	12.8%	12.7%	0.3%	-

Figure 3.5 – Source Apportionment: Larkfield Air Quality Management Area



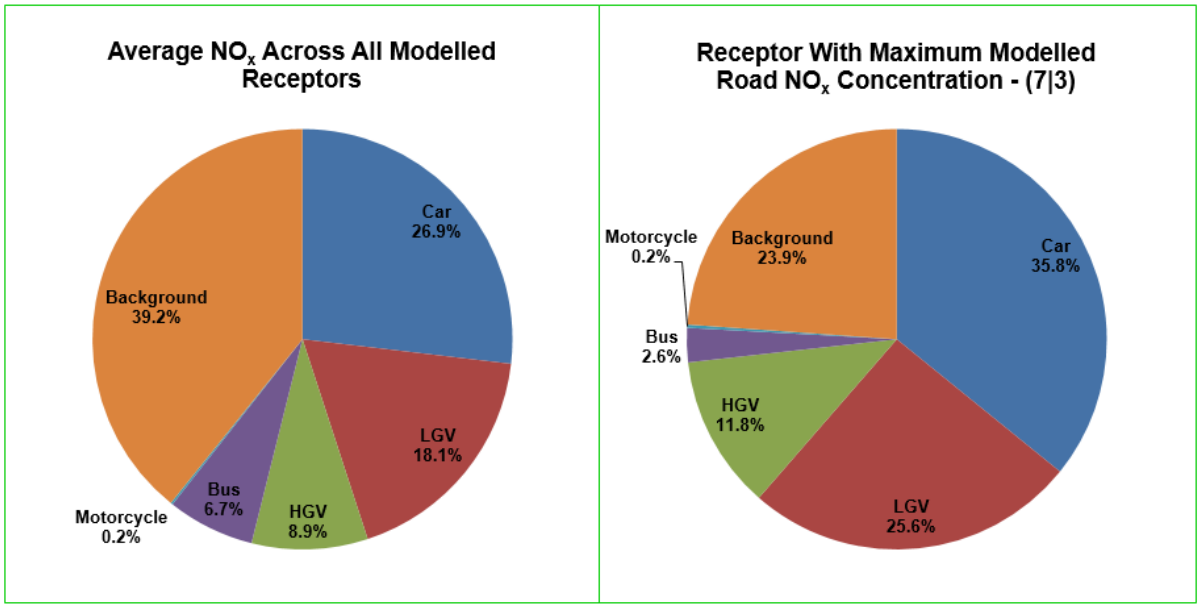
3.3.6 Borough Green Air Quality Management Area (7)

For the Borough Green AQMA, of the 49 modelled receptor locations, all receptor locations were predicted to be in compliance with the annual mean NO_2 objective, but there was one receptor predicted to have an annual mean to be within 10% of the objective. As detailed below in Table 3.6 and Figure 3.6, the results of the source apportionment exercise present that across all modelled receptors the vehicular proportion of NO_x concentration is 60.8%, and this increases to 76.1% at the receptor with the maximum modelled concentration. Across both source apportionment scenarios, the proportion of vehicular sources ranks high to low through cars, LGVs, HGVs, bus and coaches, and motorcycles.

Table 3.6 – Source Apportionment: Borough Green Air Quality Management Area

Metric	All Vehicles	Car	LGV	HGV	Bus & Coach	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration ($\mu g/m^3$)	26.4	11.7	7.9	3.9	2.9	0.1	17.1
Percentage of Total NO_x	60.8%	26.9%	18.1%	8.9%	6.7%	0.2%	39.2%
Percentage Contribution to Road NO_x	100.0%	44.2%	29.8%	14.7%	11.1%	0.3%	-
Receptor With Maximum Modelled Road NO_x Concentration (7|3)							
NO_x Concentration ($\mu g/m^3$)	53.6	25.3	18.0	8.3	1.9	0.2	16.8
Percentage of Total NO_x	76.1%	35.8%	25.6%	11.8%	2.6%	0.2%	23.9%
Percentage Contribution to Road NO_x	100.0%	47.1%	33.6%	15.6%	3.5%	0.3%	-

Figure 3.6 – Source Apportionment: Borough Green Air Quality Management Area



3.3.7 All Air Quality Management Areas

In addition to the source apportionment that has been completed within each of the six AQMAs, an assessment across all AQMAs has been complied to better assess the source contributions of NO_x across the borough as a whole. As would be expected, due to the assessment of each AQMA, out of the vehicular sources it is the car proportion that is the highest, this is true both in terms of the average across all modelled receptors and for the average across receptors with a predicted NO_2 concentration greater than 40µg/m^3.

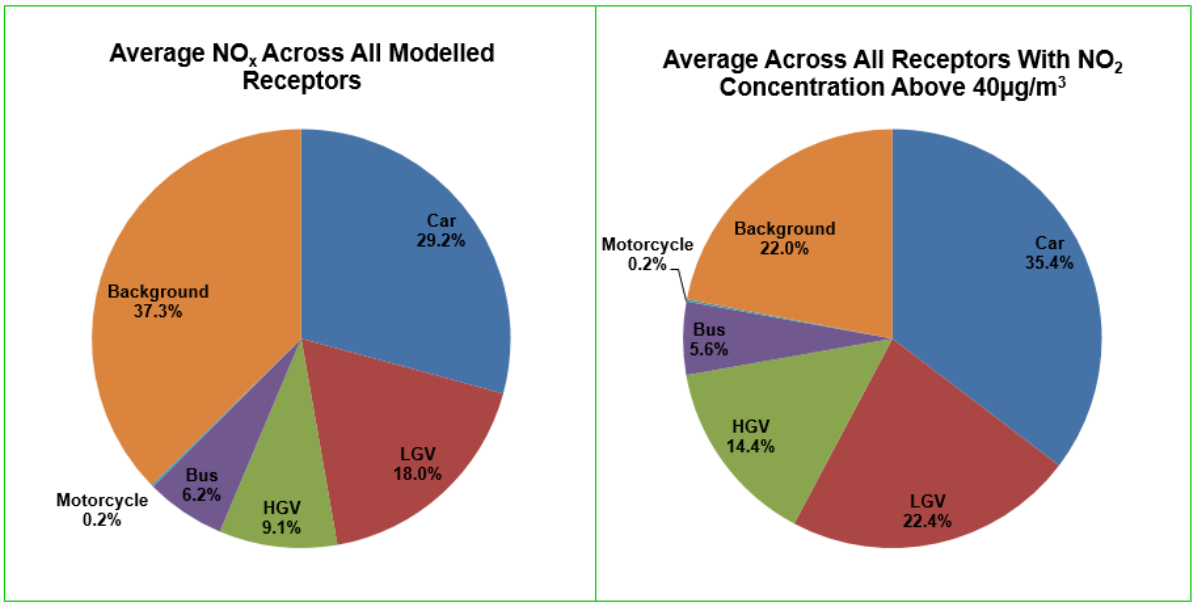
When comparing all receptors to those with NO_2 concentrations greater than 40µg/m^3 it can be seen that there is much less of a contribution from background, 37.3% compared to 22.0%. At the receptors that have been predicted to be in exceedance of the AQS annual mean objective close to 80% of the NO_x contribution is predicted to be from vehicular sources, with the highest proportion of the vehicular source to be from cars (35.4%).

The above emphasises that localised road traffic is contributing to the elevated concentrations recorded within the AQMAs, background pollutant concentrations within the AQMAs are exacerbated by road traffic emissions. It can be seen that cars and LGVs are contributing the most to NO_x concentrations, therefore there has been an emphasis upon these vehicular groups within the development of the action plan measures.

Table 3.7 – Source Apportionment: All Air Quality Management Areas

Metric	All Vehicles	Car	LGV	HGV	Bus	Motorcycle	Background
Average Across All Modelled Receptors							
NO_x Concentration (µg/m³)	30.1	14.0	8.6	4.4	3.0	0.1	17.9
Percentage of Total NO_x	62.7%	29.2%	18.0%	9.1%	6.2%	0.2%	37.3%
Percentage Contribution to Road NO_x	100.0%	46.6%	28.7%	14.5%	9.8%	0.3%	-
Average Across All Receptors With NO_2 Concentration Greater Than 40µg/m³							
NO_x Concentration (µg/m³)	71.5	32.4	20.5	13.2	5.2	0.2	20.1
Percentage of Total NO_x	78.0%	35.4%	22.4%	14.4%	5.6%	0.2%	22.0%
Percentage Contribution to Road NO_x	100.0%	45.3%	28.7%	18.5%	7.2%	0.2%	-

Figure 3.7 – Source Apportionment: All Air Quality Management Areas



3.3.8 Summary

The source apportionment assessment, completed individually in relation to each of the six designated AQMAs and in combination, has confirmed that the dominant source in regards to NO_x emissions across all of the designated AQMAs is from local road transport sources. In terms of the different vehicles that contribute to the overall vehicle NO_x source, although the specific percentages vary between each AQMA there is a clear trend for cars and LGVs contributing the highest proportion of NO_x emissions and motorbikes contributing the lowest. In terms of the car and LGV contribution, the majority of NO_x emissions are from diesel fuelled vehicles due to NO_x emissions being on average ten times higher from a diesel vehicle rather than a petrol vehicle The proportion of HGVs and Buses and Coaches varies between AQMAs with HGVs provided a higher proportion within the M20 AQMA, and in

contrast Buses and Coaches providing a higher proportion within the Tonbridge High Street AQMA.

Based upon the findings from the source apportionment exercise, and from the nature of the existing AQMAs (designated to include / located close to strategic road links and / or traffic junctions), local traffic management and sustainable transport action plan measures may assist in reducing NO_x emissions, and subsequently NO_2 concentrations within the designated AQMAs and across the borough as a whole.

3.4 Required Reduction in Emissions

In line with the methodology presented in Box 7.6 of TG(16)[7], the necessary reduction in Road NO_x emissions required to bring the each current AQMA into compliance is calculated below, as shown in Table 3.8. This has been completed at the maximum annual mean concentration location, either monitored or modelled, for each existing AQMA. The TG(16) procedure calculates the required reduction of road NO_x to achieve a total NO_2 concentration of 40µg/m^3. To take into account possible uncertainties with dispersion modelling, and also the degree of potential inaccuracy with diffusion tube monitoring a figure of 36µg/m^3 for total NO_2 concentration has been used instead (10% lower than the annual mean AQS objective). This has been used as a conservative conservation target to ensure that an AQMA is only revoked once NO_2 concentrations are confirmed to be below the AQS objective.

Table 3.8 – NO_x Reduction Required Within Each Air Quality Management Area

Metric	Air Quality Management Area					
	1	3	4	5	6	7
Maximum monitored/modelled NO_2 concentration (µg/m^3)	51.6	39.0	58.1	46.5	42.0	39.6
Road NO_x Concentration (µg/m^3)	83.2	57.9	110.2	45.9	59.4	57.7
Required Road NO_x Reduction (µg/m^3)	38.6 (46.4%)	7.1 (12.2%)	64.3 (58.4%)	25.4 (35.6%)	14.2 (23.9%)	8.5 (14.7%)

3.5 Key Priorities

Based on the information presented with Section 3, and the conclusions drawn from this, there are a number of separate area of action than can be defined.

3.5.1 Priority 1: Transport

The main source of air pollution that has caused the declaration of the AQMAs across Tonbridge and Malling is associated with road transport emissions. Therefore, reducing transport emissions through the measures contained within the AQAP are a key priority. The approach taken focuses on areas where the Tonbridge and Malling has direct control (e.g. planning and procurement of out sourced functions), or areas where measures can be implemented via a partnership e.g. with Highways England (in terms of the M20 AQMA) and / or Kent County Council.

3.5.2 Priority 2: Planning and Infrastructure

The new Local Plan, through LP:20 and subsequent policies sets out the considerations that will be applied by Tonbridge and Malling Borough Council when considering all development proposals. The Council will work with developers and partner organisations to ensure the delivery of infrastructure, services and community facilities necessary to develop and

maintain sustainable communities, this is not just in terms of air quality but all relevant environmental aspects. Further Section 106 agreements are to be sought through developments to allow aspects of funding to the secured for future mitigation measures to be developed and implemented.

3.5.3 Priority 3: Policy Guidance

The existing strategies and policies currently adopted by Tonbridge and Malling Borough Council and by Kent County Council are key mechanisms for reducing emissions across the borough, most prevalent in terms of transport that has been identified as the main source of NO_x emissions and therefore NO_2 concentrations within the existing AQMAs. For effective reductions in NO_x emissions to be realised, in addition to the implementation of the measures outlined within the AQAP future revisions of Transport Plans, Freight Strategies, Climate Change Strategies, Cycle Strategies etc should all be completed with potential air quality impacts taken into account.

3.5.4 Priority 4: Public Health and Wellbeing

As discussed in further detail within Section 3.1, the impact of air pollution on public health is detrimental therefore improving air quality within the borough is a key priority. The main sources of air pollution in areas of public exposure within Tonbridge and Malling are from vehicle emissions from vehicles travelling on the road network within the borough. Aside from restricting vehicle usage through measures such as Clean Air Zones / Low Emission Zones, the most effective way to achieve a reduction in vehicle numbers is to change the attitudes / behaviour of the population towards travel. Tonbridge and Malling Borough Council are responsible for encouragement and facilitation of these changes through education and awareness as well as through schemes which incentivise change. Improving air pollution to ensure the health of the public is maintained requires a wide reaching perspective and will therefore not be specific to the AQMA but instead aim to have a wider impact across the borough.

3.5.5 Priority 5: Air Quality Monitoring

Currently, NO_2 is monitored across Tonbridge and Malling using passive diffusion tubes and a continuous monitoring station. Air quality monitoring is a useful way to continually assess the extent of the air pollution problem within Tonbridge and Malling. It also assists in quantifying the improvements that have materialised as a consequence of implementing measures to reduce emissions, and as an evidence base for AQMAs to be revoked.

4 Development and Implementation of Tonbridge and Malling's AQAP

4.1 Steering Group

A steering group was established at the start of the update process to drive forward the development of the new AQAP. The core aim of the steering group was to identify measures for inclusion within the AQAP that would be both effective in terms of reducing NO_2 concentrations and also would be feasible in terms of implementation and delivery.

The steering group is composed mainly of Tonbridge and Malling Council officers from those Services with an interest or potential impact on air quality and who may have an influence on the action measures being considered. Members included officers from Environmental Protection, Planning Services, Environmental Health, Housing Services and also representatives from Kent County Council in terms of Highways and an external consultant Bureau Veritas. The officers have, and continue to provide guidance in their respective areas of expertise to ensure selection, and continual evaluation of the most appropriate measures. Environmental Protection have taken the lead responsibility for the production, and any subsequent updates of the plan.

The first steering group meeting was held in December 2018 with subsequent meetings carried forward through 2019. The meetings included presentations and agendas covering an overview of the action planning process, the identification of the existing issues, with an assessment of the existing AQMAs and source apportionment exercise to inform all officers, followed by a period whereby the refinement of possible action measures was completed to those contained within the AQAP which have been agreed upon in terms of the most effective, feasible and cost-effective measures for Tonbridge and Malling Borough Council to pursue. In addition to the steering group meetings, separate individual meetings between Environmental Protection and officers from each department were also conducted in order to discuss measures in more depth.

It is thought that the steering group will continue to meet at regular intervals following the adoption of the AQAP. This is essential to provide progress reports on individual actions in relation to the AQAP measures, discuss any key lessons learnt from the continual implementation of the measures and to continue to discuss any new ideas in terms of future measures and actions within the borough.

4.2 Consultation and Stakeholder Engagement

In developing this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 4.1.

In addition, we have undertaken the following stakeholder engagement:

- E.g. website
- Articles in local newspaper
- Questionnaires distributed directly to households along major roads
- etc

The response to our consultation stakeholder engagement is given in Appendix A.

Table 4.1 – Consultation Undertaken

Yes/No	Consultee
TBC	Department of Environment, Farming and Rural Affairs
TBC	Environment Agency
TBC	Highways England
TBC	Tonbridge and Malling Borough Council
TBC	Kent County Council
TBC	Neighbouring Local Authorities
TBC	Local residents
TBC	Bodies representing local business interests and other organisations as appropriate

Following the statutory consultation completed……..

5 AQAP Measures

Throughout the development of the AQAP, a wide range of measures aimed at improving air quality within the six existing AQMAs and the wider borough have been considered. TG(16)[7] states that AQAPs should be adapted to every local situation and most importantly are seen as part of an integrated package of measures , particularly in relation to linking with other key policy areas.

An evaluation of all possible measures was initially undertaken by the Environmental Protection team and other offices within the steering group to complete the refinement of measures, taking into consideration their local knowledge, the source apportionment results and existing local council policies. There were a number of measures that were considered, but not included within the AQAP. These measures, along with the reasons for non-inclusion within the AQAP are detailed within Appendix C.

Having undertaken this evaluation process, the resultant action measures contained within this AQAP are considered the most effective, feasible and cost-effective to pursue in terms of potential air quality improvements within the AQMAs and the wider borough. Given that road traffic has been identified as the principal source of NO_x emissions and therefore NO_2 concentrations within the AQMAs, the measures presented below focus on the promotion of low / zero emission transport, traffic management improvements and improved community awareness.

Table 5.1 presents the Tonbridge and Malling Borough Council AQAP measures, it contains the following:

- a list of the actions that form part of the plan;
- the responsible individual and departments/organisations who will deliver this action;
- estimated cost of implementing each action (overall cost and cost to the local authority);
- expected benefit in terms of pollutant emission and/or concentration reduction;
- the timescale for implementation; and
- how progress will be monitored.

The progress of the implementation of each measure, as per TG(16)[7] will be reviewed annually, with details provided within subsequent ASRs completed following the implementation of the AQAP.

Table 5.1 – Air Quality Action Plan Measures

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
Transport											
1	Establish/Join a Quality Bus Partnership to help upgrade Bus Fleet	Vehicle Fleet Efficiency	Promoting Low Emission Public Transport	TMBC	Bartholomew Wren / Steven Saxbee (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI measured via the % of buses meeting a set EURO standard.	In areas of high bus usage, such as within the Tonbridge High Street AQMA an NO_2, in conjunction with other measures a reduction of between 1 – 3µg/m^3 is to be aimed for.		2021 Yearly grants available so try to apply each year for a grant Related to grants if they are awarded	Establish or extend neighbouring QBP(s) to help drive up the quality and emissions performance of the local bus fleet. Engage with KCC public transport and neighbouring authorities. Pursue funding opportunities from DfT, Defra and elsewhere as appropriate. To make sure cleaner buses are used on all routes, especially those operating through AQMAs.
2	Review Taxi/Private Hire Vehicle Policy and license fees, implement a strategy to encourage a switch to low emission vehicles	Vehicle Fleet Efficiency	Fleet Efficiency and Recognition Schemes	TMBC	Katie Shipman / Anthony Garnet (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI measured via the % of taxis and private hire vehicles meeting a set EURO standard. KPI could also be to have the review completed by a set date.	To be confirmed once full fleet information is available – use of the Emissions Factor Toolkit (EFT) to define NO_x emission reductions for changes within the fleet per annum.		2025 2030	Support the review of taxi licensing policy to include options to reduce the age of vehicles in use, and to complete a review of licensing fees to work towards increasing the uptake of ULEVs. All vehicles to be petrol hybrid Euro 5 or petrol and diesel euro 6 by 2025. By 2030 all vehicles to be zero or ultra low emissions such as electric or liquid petroleum gas
3	**Explore opportunities to reduce emissions from local delivery HGV's/LGV's possibly through the formations of a Freight Quality Partnership**	**Freight and Delivery Management**	**Freight Partnerships for Town Centre Deliveries**	**TMBC**	**Steven Saxbee / Jeremy Whittaker (TMBC)**	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	**KPI measured via the % vehicles meeting a set EURO standard, and/or by the % of business participation in recognition schemes.**	**To be confirmed once fleet information is available – use of the EFT to define NOx emission reductions for changes within a fleet.**		2021 2021	Opportunities for sustainable urban freight deliveries at existing locations and for new developments, can also help promote recognition schemes such as ECO Stars. Through kent Invicta Chamber of Commerce etc and on media / website If Locase is extended past march 2020 then businesses can get grant from KCC up to 40% of costs towards low carbon and greener fuels projects (max £20,000) Advertise this on media / website

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
4	Develop and implement a borough-wide school transport scheme	Promoting Travel Alternatives	School Travel Plans	KCC	Relevant KCC officer/team to lead, Contact at TMBC to be Tamsin Ritchie	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPIs may include the following: % reduction of children travelling to school in cars % of children cycling or walking to school. Number of schools implementing individual school travel plans.	Measure has the potential to have a medium to high impact upon short term NO_2 concentrations close to schools depending on the uptake of the schemes across the borough. On a borough wide scale a lesser impact upon on concentrations would be realised.		2022 2020 2020 2020 2021 Yearly	Walking buses, action to focus on school run drop offs, feasibility of school start time variations. Work closely with KCC in developing these travel plans and feasibility studies. Bike Smart (Tonbridge) Tonbridge schools (secondary) Anti-idling outside school gates. Signs Banners etc Walk to school needs to start organising in Jan for sept role out. Bike to school. Bike Week? dates?
5	Create Anti-idling zone at Tonbridge taxi rank Develop and enforce a borough wide anti-idling campaign	Traffic Management	Anti-Idling Enforcement	TMBC to lead but working closely with KCC Highways team where they have input	At TMBC, Katie Shipman / Anthony Garnet (Tonbridge taxi rank) Steven Saxbee (borough wide)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI measured via an annual review of the number of fixed penalty fines and number of complaints received. After an initial year of results the % change in penalty fines and complaints can be quantified.	Measure is more an awareness raising tool, however it is also a useful measure to prevent vehicles idling and causing congestion in specific locations, which is a significant cause of emissions.		2021 2020	Borough-wide anti idling enforcement at taxi ranks, bus stops, and outside schools etc. Social Media posts to encourage behavioural change. School case study to be chosen
6	Pilot a Car Club within the Council for individuals use in local communities	Promoting Travel Alternatives	Workplace Travel Planning	TMBC	Steven Saxbee / Jeremy Whittaker (TMBC)	Wateringbury, Aylesford, Larkfield	The introduction of pool cars can result in a reduction of approximately 20% in business mileage. KPI relating to usage at the Council can be measurements of reduction in annual mileage undertaken per team.	NO_x emission reduction achieved by the Council will be able to be calculated annually.		2020 2022 2022 2020	Tunbridge Wells Borough Council operate a successful car club, to be contacted for information. Car club campaigns, possibility to include advertising and sponsorship opportunities. Contact Liberty at Kings Hill for setting up round the estate Also advertise Kent Journey share (when covid restrictions lift)
7	Continue to explore traffic improvement options at Wateringbury crossroads, emphasis on looking at capacity and flow	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	KCC	Tim Middleton at KCC (with possible assistance from TMBC Technical Services)	Wateringbury	KPI to be formulated once option has been developed, to be based around vehicle turning counts and/or queuing statistics.	An improvement to the Wateringbury crossroads would aim to reduce NO_2 concentrations by between 1 – 5µg/m^3.		2024	Following the completion of a feasibility study a preferred option will be taken forward within Wateringbury.
8	Encourage companies to allow home working at least one day a week	Other	Via the internet and other mechanisms	TMBC	Jeremy Whittaker / Steven Saxbee (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Yearly surveys to companies for numbers of staff and number of days a week staff work at home	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 5µg/m^3. Based on small uptake		To start in 2020 and be ongoing	To promote on website multimedia and targeted adds campaigns to local office based companies using momentum from for home working from Covid restrictions

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
Planning and Infrastructure											
9	Explore the process for possible standardising Section 106 agreement funding from development for AQ improvements	Policy Guidance and Development Control	Other Policy	TMBC	Steven Saxbee / Emma Keefe (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI may be the total number of Section 106 agreements secure in terms of AQ funding per annum, or the total amount of funding secured per annum.	N/A		ongoing	Standardising the process for securing S106 agreements for AQ to be linked with planning department to ensure harmonious implementation. Conditions to be more specific in planning decisions regarding green energy, low emission vehicle and EV parking (policy compliant).
10	Installation of electric charging points within Council car parks throughout the borough	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	TMBC to lead with input from KCC	Andrew Young (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPI should include the number of EV charging points installed within the borough from a baseline year, and the number and % increase per annum.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3 based upon a low to medium uptake.		2025 or sooner	Council car parks, TMBC funded with possible assistance from KCC OLEV could provide funding
11	Installation of green walls and increased vegetation across the borough	Other	Other	TMBC	Tamsin Ritchie /Steven Saxbee (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	The number of green walls / vegetation installed within the borough per annum.	N/A		2021 2021 2024 2021	Investigate areas like Wateringbury where results are close to hourly mean or increasing vegetation can made a difference Look into if grant funding is available To be installed as a physical barrier to increase distances between the road and pedestrians. See if can be done through planning applications
Public Information, Strategies and Policy Guidance											
12	Raise public awareness through the launch of a Travel Choices Campaign	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	TMBC to lead with assistance from KCC (see comments)	Tamsin Ritchie / Steven Saxbee (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Usage statistics for public transport across the borough per annum.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3.		2021 2021	Possibility of partnership with 'Step Ahead of the Rest' KCC Active travel programme. Social Media advertising. Community projects
13	Prepare a new Local Cycling and Walking Infrastructure plan (LCWIP)	Promoting Low Emission Transport	Promotion of cycling	TMBC working closely with KCC	Bartholomew Wren (TMBC)	Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	2021	Identify infrastructure improvements to support existing and new communities to walk and cycle more frequently, through the provision of a more joined up route network. Work with partners including KCC Highways and Public Rights of Way.		2021	Identify if there any specific routes that can be improved upon or require the introduction of new routes.

Measure Number	Measure	EU Category	EU Classification	Lead Authority	Lead officer	AQMA Covered	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
13b	Delivery of identified cycling and walking schemes	Promoting Low Emission Transport	Promotion of cycling	KCC	Relevant KCC officer/team	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	KPIs to include: Usage of rental schemes. Numbers of cycle to work schemes Implementation of new routes per annum. Obtain figures from use of new cycle hub and Tonbridge station	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3 based upon a low to medium uptake.		2021-2030 ongoing ongoing	Following the completion of the LCWIP, the identified cycling and walking routes will be improved / new routes are to be introduced. In addition cycle to work schemes are to be encouraged and supported through local campaigns, events and planning negotiations. Active travel to be promoted in partnership with KCC – Kent Connected. Tie in with 11. Bike Smart Tonbridge. Bike Smart Malling (Wrotham School). Tie in with 11
14	Education and encouragement in terms of air quality across the borough: public workshops, leaflet campaigns, advertising, approaching schools, businesses, community centres	Public Information	Via leaflets and other mechanisms	TMBC	Tamsin Ritchie (TMBC)	M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Usage statistics for public transport and zero emission transport options (walking and cycling) across the borough per annum. Most of the individual parts to this measure can be developed immediately, again it may be beneficial to have a KPI relating to implementation time.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3.		2020 2021 Asses if needs to be repeated over 5 years 2021 2021	Available AQ information, current issues, what the council is doing paired with what the public can do as a bottom up approach. Provision of workshops, physical and digital leaflets, drop in sessions, dedicated phone-line etc. Social media visibility is a key element with potential to link to other KES/ELES communications. Community Champions / case studies
15	Implement an improved public transport information platform	Public Information	Via the internet and other mechanisms	KCC		M20, Tonbridge, Wateringbury, Aylesford, Larkfield, Borough Green	Usage statistics for public transport across the borough per annum.	Small impact upon NO_2 concentrations from measure individually, estimated to be less than 1µg/m^3.		2021 2021 2021	To include links to Kent connected □pt and options to download it on website. To include the provision of high quality accessible information on sustainable travel, also the promotion of public transport use to incentivise usage. All available information to be linked to 'smarter cities' initiative.

Appendix A: Maps of Current Air Quality Management Areas

Figure A.1 – M20 Air Quality Management Area

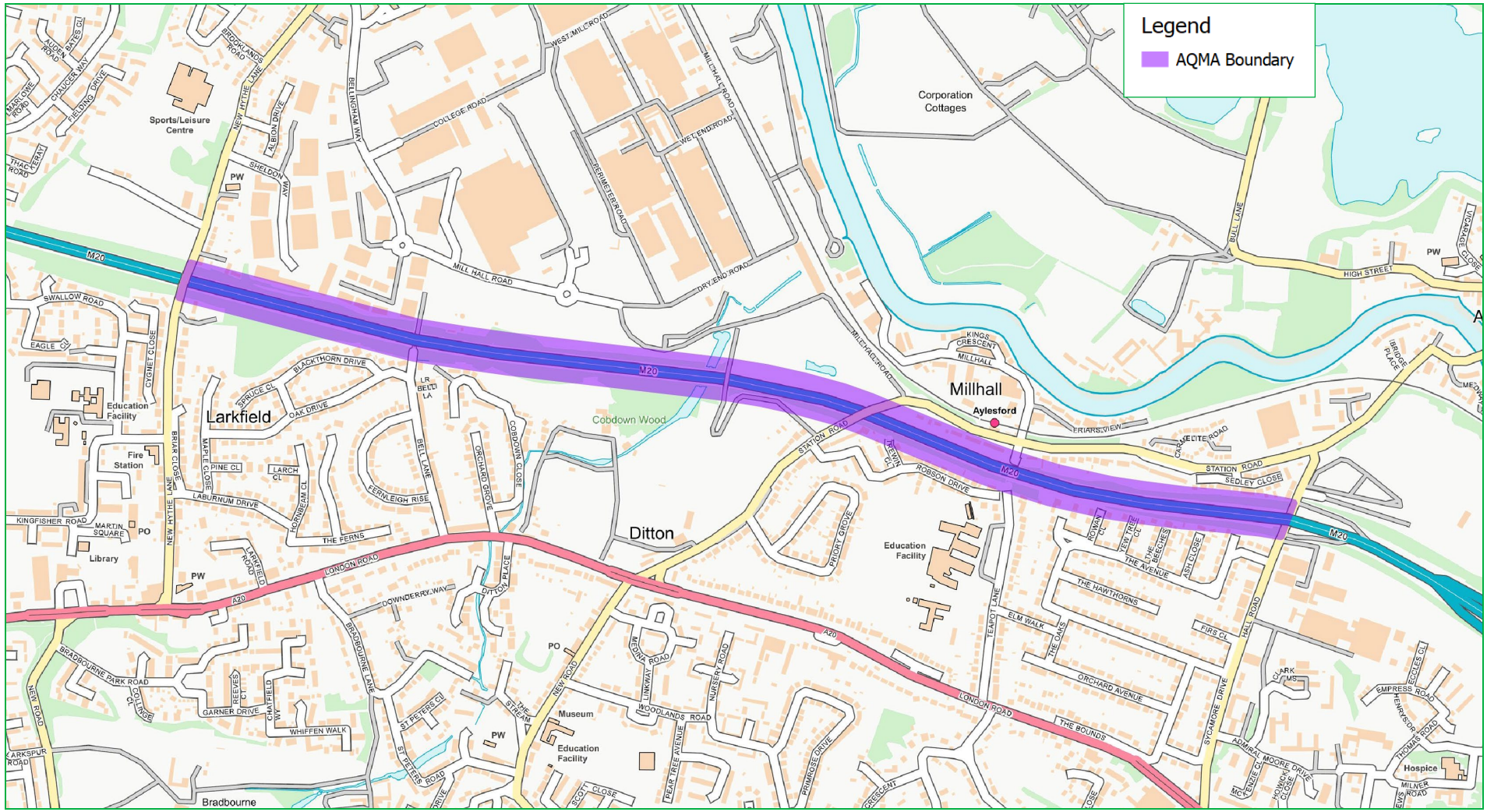


Figure A.2 – Tonbridge High Street Air Quality Management Area

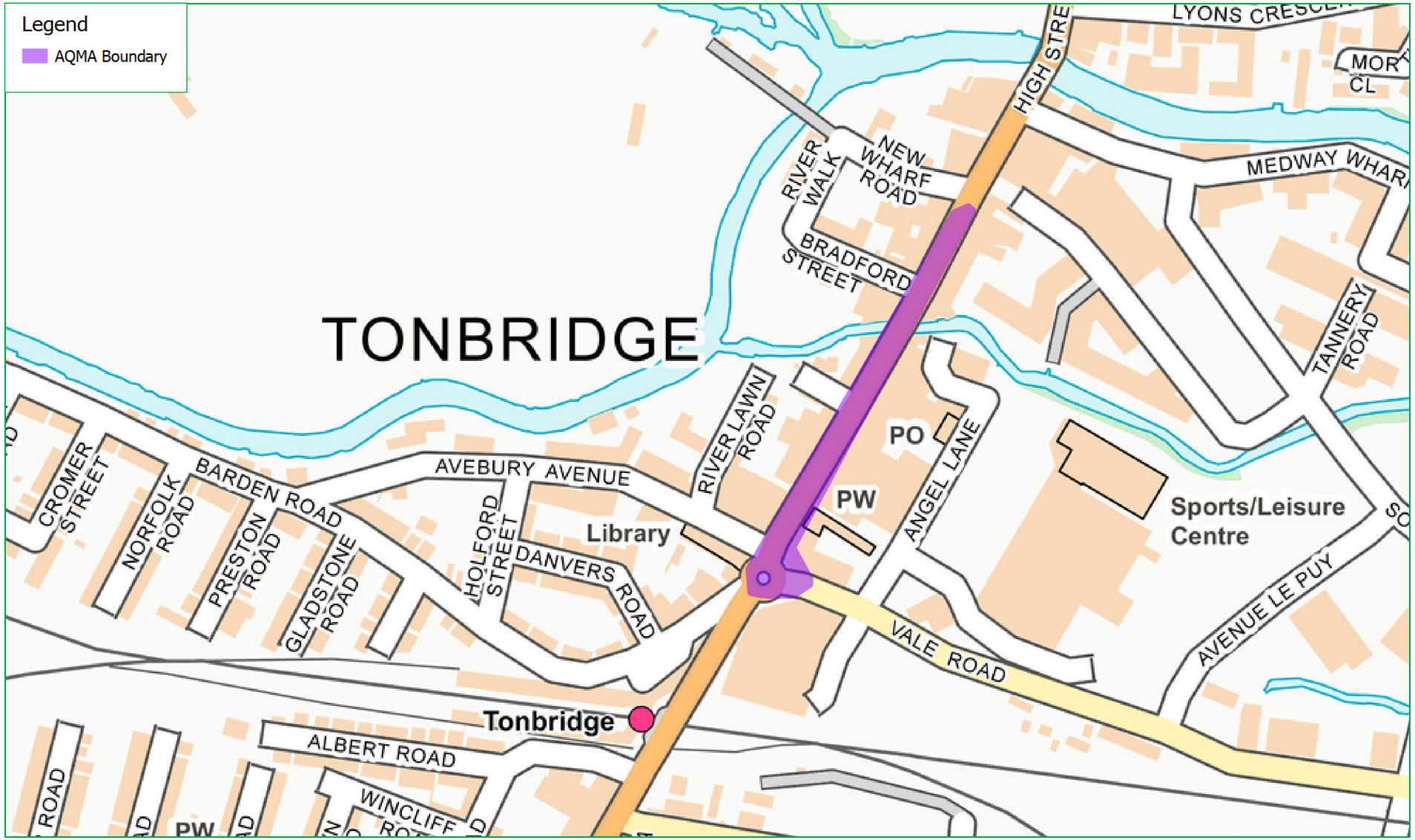


Figure A.3 – Wateringbury Air Quality Management Area

Figure A.4 – Aylesford Air Quality Management Area (Amended)

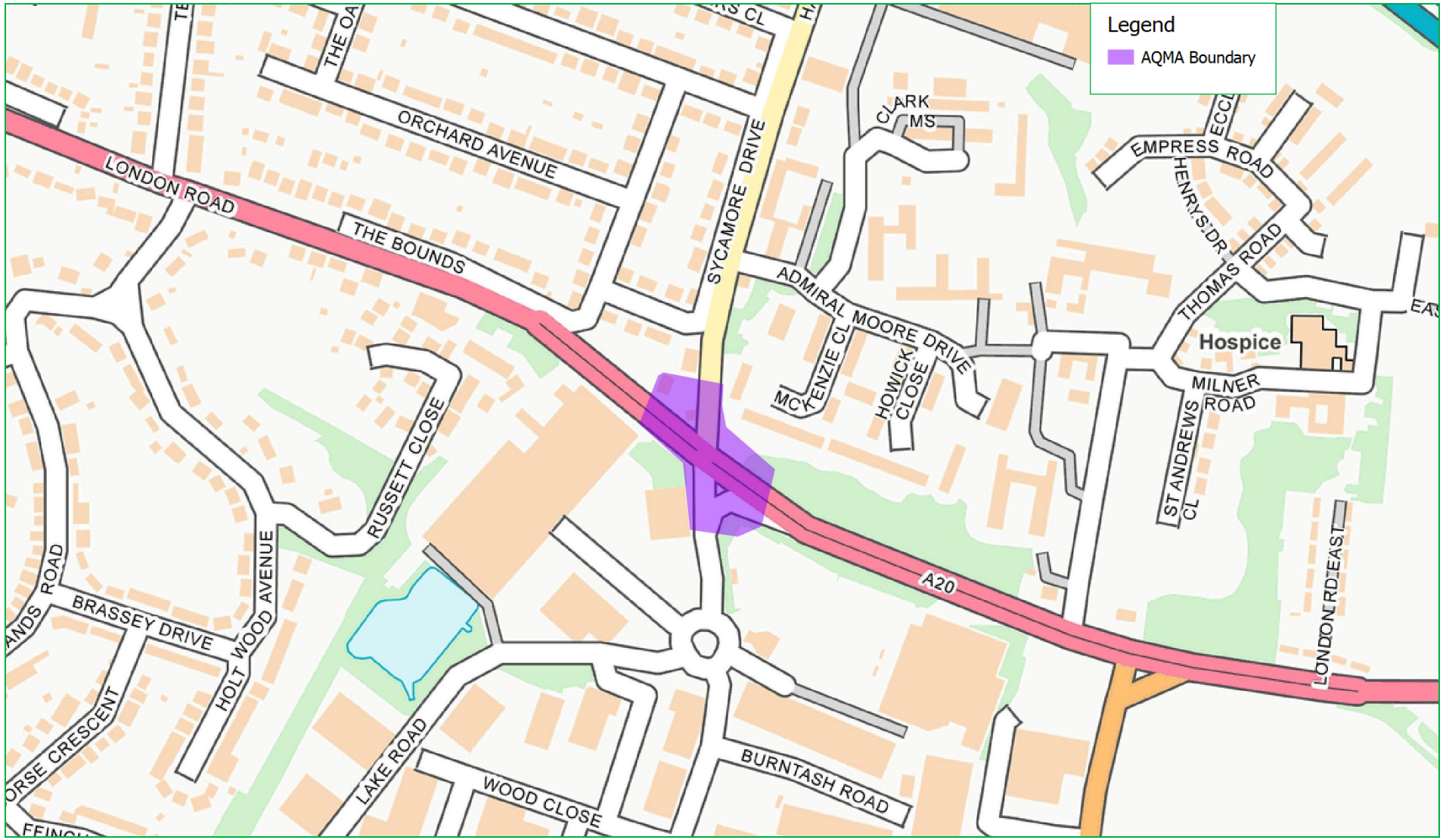


Figure A.5 – Larkfield Air Quality Management Area (Amended)

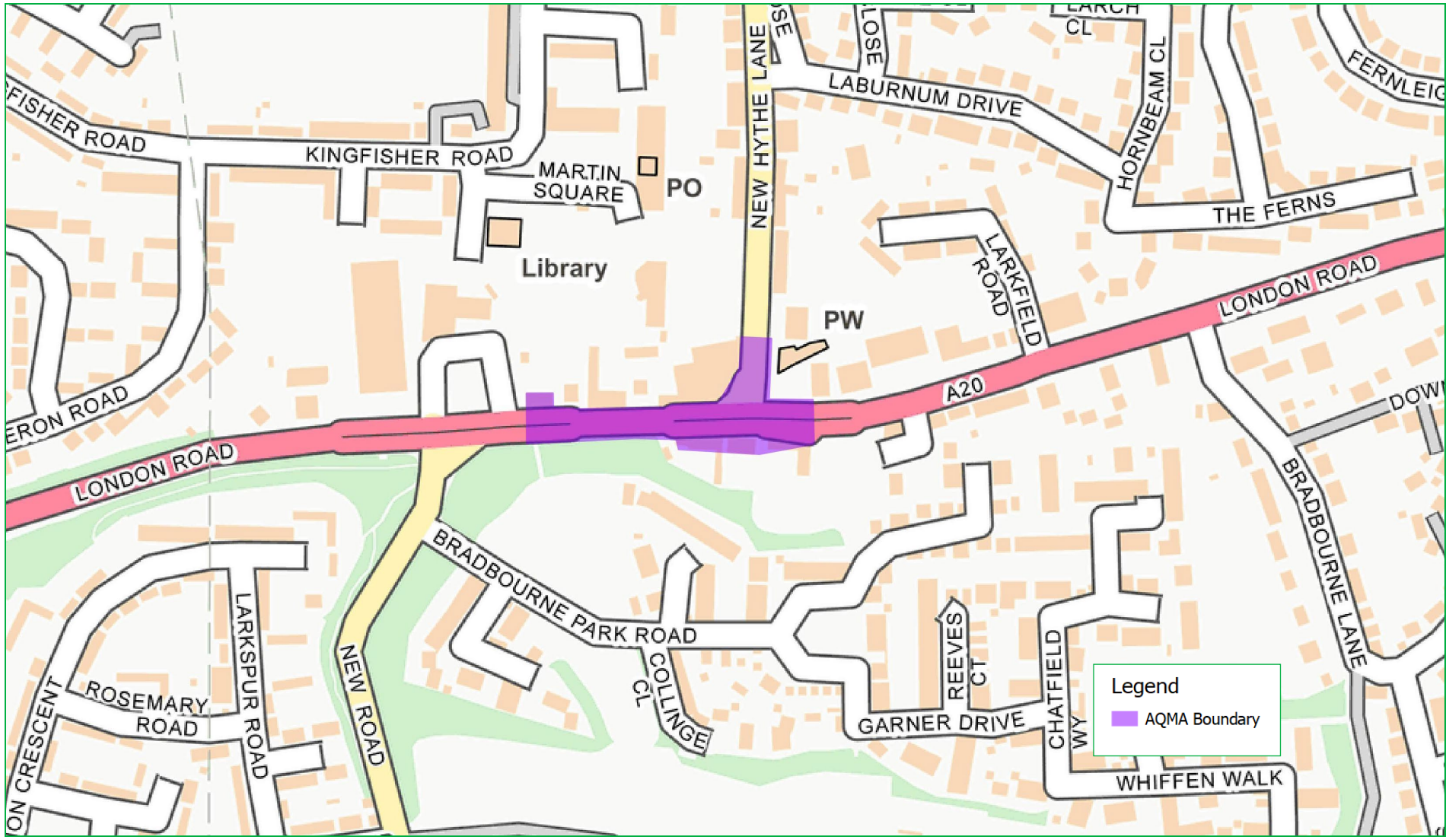
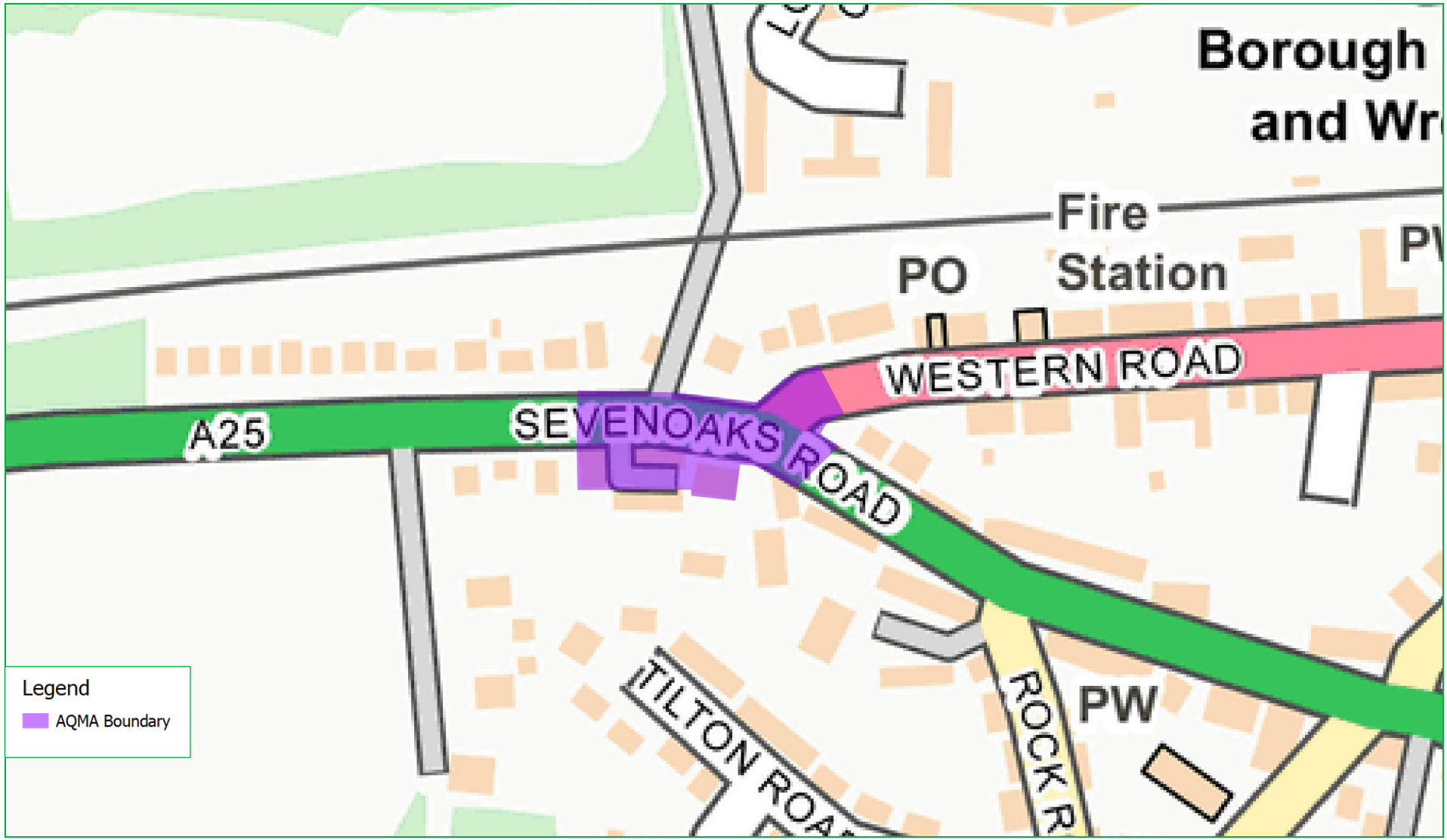


Figure A.6 – Borough Green Air Quality Management Area (Amended)



Appendix B: Response to Consultation

Table B.1 – Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response
e.g. Chamber of Commerce	Business	E.g. Disagree with plan to remove parking on High Street in favour of buses and cycles; consider it will harm business of members.

Appendix C: Reasons for Not Pursuing Action Plan Measures

Table C.1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action Category	Action Description	Reason action is not being pursued (including Stakeholder views)
Traffic Management	Introduce permanent speed reduction zone on M20 (J3-5) on completion of smart motorway in 2020	Highways England Road – smart motorway has been implemented partly of AQ grounds – impact to be assessed before any further actions to be taken
Promoting Low Emission Transport	Council car fleet upgrades	
Promoting Low Emission Transport	Taxi scrappage/retrofit scheme to upgrade vehicles over 5 years' old	Scrappage scheme would have to be on a national scale to have intended impact
Vehicle Fleet Efficiency	Collaborative waste fleet upgrades across the county	Too many different operators?
Vehicle Fleet Efficiency	Pollution abatement equipment for local delivery HGVs/LGVs	
Vehicle Fleet Efficiency	Clean van commitment, review of delivery routes through AQMAs, LGV delivery consolidation	
Traffic Management	Restrictions on HGVs in AQMAs during Peak Periods/HGV's Routing	
Traffic Management	Smart' traffic lights within Wateringbury looking at capacity and flow, trying to improve flow	Other options to be looked at for Wateringbury junction
Promoting Low Emission Transport	Workplace parking levys - payments linked to vehicle emission standards?	
Traffic Management	Bus route amendments for AQMAs	
Promoting Travel Alternatives	Partial pedestrianisation of Tonbridge High Street	Unrealistic, only a slight reduction in NO_2 concentrations required in Tonbridge
Policy Guidance and Development Control	Review the Kent and Medway Air Quality and Development Control Guidance; adapt to TMBC and adopt	
Promoting Travel Alternatives	Council and local businesses to promote a home working scheme to reduce car use	
Promoting Travel Alternatives	Encouragement of car sharing, campaign to reduce single occupancy trips	Public awareness campaign to be completed under measure 12

<Appendix C: Add Additional Appendices as Required>

INSTRUCTIONS

The Council should add additional supporting appendices as required.

For example, where the selection of AQAP measures has been supported by further studies, e.g. quantitative appraisal of action plan measures through dispersion modelling, or other feasibility studies, this work should be included here.

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CAZ	Clean Air Zone
COMEAP	The Committee on the Medical Effects of Air Pollution
Defra	Department for Environment, Food and Rural Affairs
EA	Environment Agency
HGV	Heavy Goods Vehicle
EU	European Union
KCC	Kent County Council
LAQM	Local Air Quality Management
LGV	Light Goods Vehicle
NO_2	Nitrogen Dioxide
PCM	Pollution Climate Mapping
NO_x	Nitrogen Oxides
PHE	Public Health England
PM_{10}	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
$PM_{2.5}$	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less

AQMA Technical Note

Tonbridge and Malling Borough Council AQMA Review

November 2019

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Document Control Sheet

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	Name	Job Title	Signature
Prepared By	P Bentley	Senior Consultant	
Approved By	J Clayton	Principal Consultant	

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Any questions or matters arising from this Report should be addressed in the first instance to the Project Manager.

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Executive Summary

Bureau Veritas have been commissioned by Tonbridge and Malling Borough Council to complete a review of the Council's existing Air Quality Management Areas (AQMAs) to help inform a new Air Quality Action Plan (AQAP). The Council currently have seven AQMAs, all of which have been declared in relation to traffic emissions; six of the AQMAs have been designated for exceedances of the NO_2 annual mean Air Quality Strategy objective, whereas the M20 AQMA has been declared due to exceedances of both the NO_2 annual mean and the PM_{10} 24-hour mean AQS objectives.

A dispersion modelling assessment has been completed whereby NO_2 and PM_{10} concentrations have been predicted across all relevant areas within the borough at both specific receptor locations, and across a number of gridded areas to allow the production of concentration isopleths. This has been used to supplement local monitoring data to provide a clear picture of the pollutant conditions within the borough.

Following the completion of the analysis of both monitoring data and modelled concentrations across all of the assessed area a number of recommendations have been made in terms of the AQMAs within Tonbridge and Malling:

- M20 AQMA (1) – A revocation of the AQMA in terms of the 24-hour PM_{10} objective, and for the annual mean NO_2 designation to remain in force;
- Ditton AQMA (2) – A revocation of the AQMA;
- Tonbridge High Street AQMA (3) – The AQMA to remain in place based upon current monitoring results, with the designation to be reviewed based upon future monitoring data;
- Wateringbury AQMA (4) – The AQMA to remain in place based upon monitoring and modelled results;
- Aylesford AQMA (5) – A revision of the AQMA boundary based upon both monitored and modelled concentrations;
- Larkfield AQMA (6) – A revision of the AQMA boundary based upon both monitored and modelled concentrations; and
- Borough Green AQMA (7) – A revision of the AQMA boundary based upon both monitored and modelled concentrations.

The next steps upon completion of this Technical Note are to develop, through consideration of merit, a defined set of achievable measures to be drawn forward into the revised action plan document.

1 Introduction

Bureau Veritas have been commissioned by Tonbridge and Malling Borough Council ("the Council") to complete a review of the Council's existing Air Quality Management Areas (AQMAs) to help inform a new Air Quality Action Plan (AQAP). The Council's current draft AQAP was published in 2011, and the details presented within this Technical Note are to be used to develop an updated AQAP.

The Council currently have seven AQMAs. All of which are related to traffic emissions; six of the AQMAs have been designated for exceedances of the NO_2 annual mean Air Quality Strategy (AQS) objective, whereas the M20 AQMA has been declared due to exceedances of both the NO_2 annual mean and the PM_{10} 24-hour mean AQS objectives. Details of the AQMAs are as follows:

- M20 AQMA (1) – An area extending 39m from the centreline along the M20 motorway between the points where it passes below New Hythe Lane, Larkfield to the west and where it crosses Hall Road, Aylesford to the east;
- Ditton AQMA (2) – An area incorporating the Station Road/London Road A20 crossroads in the Parish of Ditton;
- Tonbridge High Street AQMA (3) – An area incorporating the High Street between Botany and the High Street/Vale Road roundabout, Tonbridge;
- Wateringbury AQMA (4) – An area incorporating the Red Hill/Tonbridge Road A26 crossroads in the Parish of Wateringbury;
- Aylesford AQMA (5) – An area encompassing the A20 London Road in Aylesford, including the junction with Hall Road and Mills Road;
- Larkfield AQMA (6) – An area encompassing the A20 London Road in East Malling, Larkfield and Ditton, including the junction with New Hythe Lane; and
- Borough Green AQMA (7) – Parts of Sevenoaks Road A25, Western Road and the High Street in Borough Green.

1.1 Scope of Report

This Technical Note seeks, with reasonably certainty, to predict the magnitude and geographical extent of any exceedances of the AQS objectives, providing the Council with updated modelling data that can be utilised for the development and/or updates to AQAP measures.

The areas considered as part of this study are illustrated in the figures shown under each AQMA heading within this report. The following are the main objectives of this report:

- To assess the air quality at selected locations ("receptors") at the façades of existing residential units, representative of worst-case exposure within, and close to the existing AQMA boundaries, based on modelling of emissions from road traffic on the local road network;
- To determine the geographical extent of any potential exceedance of the annual mean AQS objective for NO_2, and in regards to the M20 AQMA the 24-hour AQS objective for PM_{10};
- To determine the relative contributions of various source types to the overall pollutant concentrations through the completion of a source apportionment study; and

- To put forward recommendations as to the extent of any changes to the current AQMA boundary, and any changes to the declaration of the specific AQMAs.

The approach adopted in this assessment to assess the impact of road traffic emissions on air quality utilised the atmospheric dispersion model ADMS-Roads version 4.1.1, focusing on emissions of oxides of nitrogen (NO_x), which comprise of nitric oxide (NO) and NO_2, and also on PM_{10}.

In order to provide consistency with the Council's own work on air quality, the guiding principles for air quality assessments as set out in the latest guidance and tools provided by Defra for air quality assessment (LAQM.TG(16)[1]) have been used.

All figures presented within this Technical Note are not to scale and contain Ordnance Survey Data © Crown Copyright and database right 2019. Ordnance Survey 100049046.

[1] Local Air Quality Management Technical Guidance LAQM.TG(16). April 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.

2 Assessment Methodology

To predict pollutant concentrations of road traffic emissions the atmospheric model ADMS Roads version 4.1.1 was utilised, with the approach used based upon the following:

- Prediction of NO_2 and PM_{10} (where relevant) concentrations to which existing receptors may be exposed and comparison with the relevant AQS objectives;
- Quantification of relative NO_2 contribution of sources to overall NO_2 pollutant concentration; and
- Determination of the geographical extent of any potential exceedances in regards to the existing AQMA boundaries and proposed boundary changes stated in the previous assessment.

Pollutant concentrations have been predicted within a baseyear of 2018, with model inputs relevant to the assessment based upon the same year.

2.1 Traffic Inputs

Traffic flows for the road links included within the model have been taken from two sources; Kent County Council data presented within the Councils Local Plan Transport Assessment[2], and the remaining links from the DfT traffic count online resource[3]. Where relevant traffic flows for years preceding 2018 have been used, the data has been factored up to 2018 a factor derived from TEMPro Version 7.2.

Traffic speeds were modelled at the relevant speed limit for each road. However, in accordance with LAQM.TG(16)[1], where appropriate, traffic speeds have been reduced to simulate queues at junctions, traffic lights and other locations where queues or slower traffic are known to occur.

The Emissions Factors Toolkit (EFT) version 9.0[4] developed by Bureau Veritas on behalf of Defra has been used to determine vehicle emission factors for input into the ADMS-Roads model. The emission factors are based upon the traffic data inputs used within the assessment.

2.2 General Model Inputs

A site surface roughness value of 0.5m was entered into the ADMS-roads model, consistent with the suburban nature of the modelled domain.

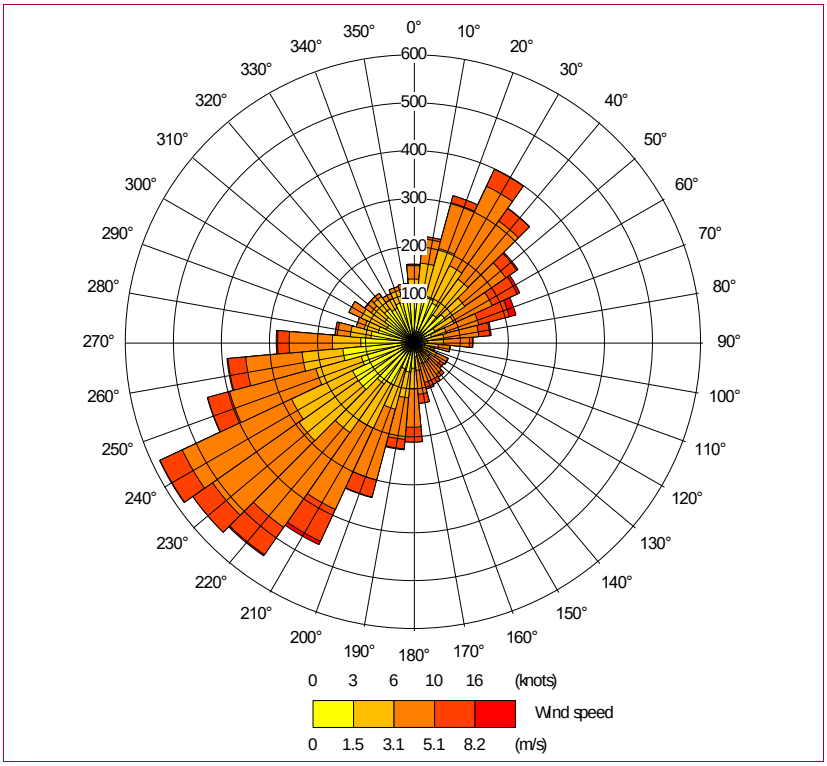
One year of hourly sequential meteorological data from a representative synoptic station is required by the dispersion model. 2018 meteorological data from Charlwood weather station, has been used in this assessment. A wind rose for this site for the year 2018 is presented in Figure 2.1.

[2] Mott MacDonald, Tonbridge and Malling Local Plan, Transport Assessment (2018

[3] Department for Transport, Traffic distribution by time of day on all roads in Great Britain (2019), available at https://www.gov.uk/government/collections/road-traffic-statistics

[4] Defra, Emissions Factors Toolkit (2019). http://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html

Figure 2.1 – Wind Rose for Charlwood 2018 Meteorological Data 2018



2.3 Sensitive Receptors

180 specific receptors were included within the assessment to represent locations of relevant exposure, the locations were identified through the completion of a desktop study and through consultation with the Council. In addition concentrations were also modelled across regular gridded area's set across the individual AQMAs within the model domain at a receptor height of 1.5m (plus at 3m for AQMA 3). These were supplemented with additional receptor points added close to the modelled road links, using the intelligent gridding tool in ADMS-Roads.

The majority of the receptors (162) were included at a height of 1.5m to represent ground level exposure, whereas 18 receptors were included at increased heights of 3m or 5m at various locations to represent exposure at buildings with residential use at a first storey level. The receptors at a height of greater than 1.5m are all located within AQMA 3 where there is residential exposure located above ground floor commercial usage along Tonbridge High Street.

2.4 Model Outputs

Background pollutant values derived from the Defra background maps database[5] have been used in conjunction with the concentrations predicted by the ADMS-Roads model to calculate predicted total annual mean concentrations of NO_x.

For the prediction of annual mean NO_2 concentrations for the modelled scenarios, the output of the ADMS-Roads model for road NOx contributions has been converted to total NO2 following the methodology in LAQM.TG(16)1, using the NO_x to NO_2 conversion tool developed on behalf of Defra. This tool also utilises the total background NO_x and NO_2 concentrations. This assessment has utilised version 7.1 of the NO_x to NO_2 conversion tool[6]. The road contribution is then added to the appropriate NO_2 background concentration value to obtain an overall total NO_2 concentration.

[5] Defra Background Maps (2019), http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html

[6] Defra NO_x to NO_2 Calculator (2019), available at https://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html#NOxNO2calc

In addition to the calculation of total NO_2 annual mean concentrations, source apportionment was also carried out split between the following vehicle classes, for both NO_x and NO_2:

- Cars;
- Light-Goods Vehicles (LGVs);
- Heavy-Goods Vehicles (HGVs);
- Bus and Coaches; and
- Motorcycles.

Verification of the ADMS-Roads assessment has been undertaken using a number of local authority diffusion tube monitoring locations in accordance with the methodology detailed within LAQM.TG(16)[1]. Due to the spatial variance of the AQMA's across Tonbridge and Malling, separate verification has been completed for a number of different areas to take into account local monitoring results and specific local conditions. All NO_2 results presented in the assessment are those calculated following the process of model verification, using the following NO_x verification factors:

- AQMAs 1, 2, 5 and 6 – 1.827;
- AQMA 3 – 2.461;
- AQMA 4 – 5.684; and
- AQMA 7 – 2.334.

For the prediction of short term PM_{10} within the assessment of AQMA 1, LAQM.TG(16)[1] provides an empirical relationship between the annual mean and the number of exceedances of the 24-hour mean AQS objective for PM_{10} that can be calculated as follows:

$$Number\ of\ 24\ hour\ Mean\ Exceedences = -18.5 + 0.00145 * annual\ mean^3 + \frac{206}{annual\ mean}$$

This relationship has thus been adopted to determine whether exceedances of the short-term PM_{10} AQS objective are likely in this assessment, with annual mean PM_{10} results derived by combining the modelled road contributions with the relevant background annual mean PM_{10} concentrations. As with the modelled road NO_x emissions, the modelled PM_{10} road emissions have had a verification factor applied to them. There are no PM_{10} monitoring sites within Tonbridge and Malling, therefore as per LAQM.TG(16)[1] guidance the relevant NO_x verification factor has been used (1.827).

3 Modelling Results

The following section provides a detailed assessment for each AQMA, comparing monitoring completed within the AQMA over a five year period with the modelled concentrations of annual mean NO_2, and in reference to AQMA 1, 24-hour PM_{10} concentrations. Details of each monitoring location, and monitoring results have been taken from the 2019 Annual Status Report[7] completed by the Council. For each AQMA, recommendations have been put forward in terms of the current determination of the specific AQMA, in relation to potential changes to the designation or boundary.

Within the tabulated presentation of results for each AQMA any exceedances of the annual mean AQS objective of 40µg/m³ have been highlighted in red, and where the predicted annual mean is within 10% of the annual mean objective (36µg/m³) this has been highlighted in orange. Annual mean concentrations that are within 10% of the objective have been highlighted as a precautionary procedure, this is to ensure that for any recommendations made in terms of AQMA designation and revocation an element of uncertainty has been taken into account in regards to the predicted modelling concentrations.

3.1 AQMA 1 – M20

3.1.1 Council Monitoring Data

AQMA 1 is currently designated for both concentrations of annual mean NO_2 and 24-hour PM_{10}, and the current boundary incorporates a large section of the M20 between Larkfield and Aylesford. Currently there are nine diffusion tubes monitoring annual mean NO_2 located within the AQMA's modelled area, but there is not any PM_{10} monitoring located within the AQMA. The current monitoring diffusion tube sites both within, and located close to the AQMA are presented in Figure 3.1, and results for the previous five years are detailed in Table 3.1.

It can be seen that there have not been any exceedances of the annual mean NO_2 AQS objective within, or close to the AQMA for the past five years. The highest concentration recorded in 2018 was 34.9µg/m³ at TN5, which since its inception in 2016 has recorded the highest annual mean concentration for the past three years.

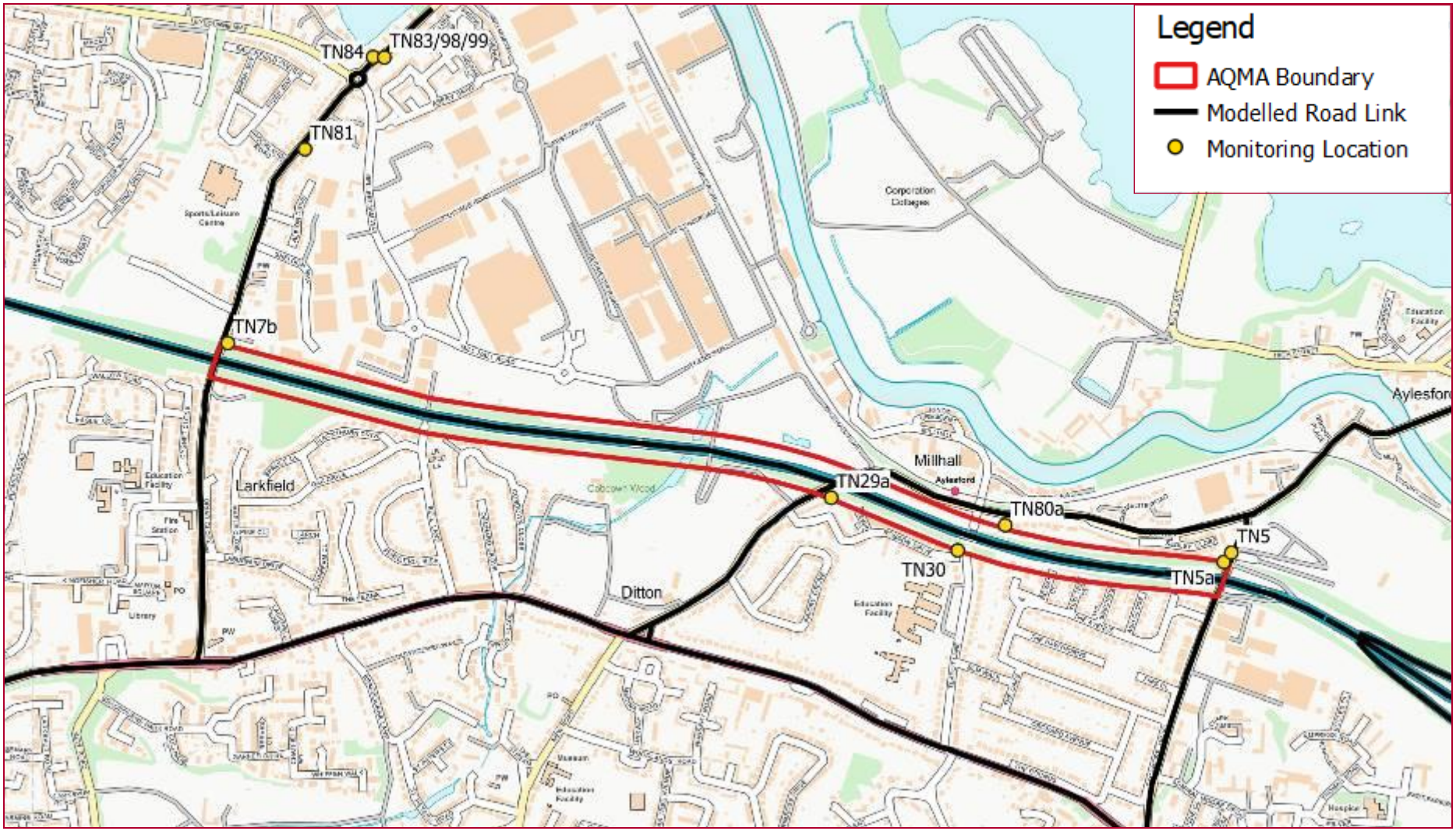
Table 3.1 – Passive NO_2 Monitoring Within, and Close to AQMA 1

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration (µg/m³)[1]				
						2014	2015	2016	2017	2018
TN5	R	572628	158566	4.85	YES	-	-	38.1	38.8	34.9
TN7b	R	570391	159032	33.3	YES	-	-	38.0	36.7	31.5
TN80a	R	572124	158627	35.8	YES	38.8	35.1	34.4	35.4	30.2
TN5a	R	572611	158545	26.7	YES	37.1	35.5	34.5	34.1	30.1
TN30	R	572018	158571	22	YES	28.3	29.3	29.7	26.7	25.5
TN29a	R	571736	158688	22.4	YES	24.9	25.4	28.0	25.2	24.1
TN83, 98, 99	R	570740	159667	4.1	NO	38.2	34.3	35.8	35.9	33.1
TN84	R	570715	159668	7.4	NO	31.1	30.0	29.9	29.6	26.7
TN81	R	570563	159463	5.4	NO	33.7	29.7	31.2	28.8	28.4

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m³
R= Roadside
Details of diffusion tubes and results taken from the 2019 Tonbridge and Malling ASR

[7] Tonbridge and Malling District Council, 2019 Annual Status Report (2019).

Figure 3.1 – AQMA 1, Modelled Roads and Monitoring Locations



3.1.2 Annual Mean NO_2

Table 3.2 provides the modelled annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. Of the 39 modelled receptor locations, exceedances of the annual mean NO_2 objective have been predicted at nine receptors, and one further receptor had an annual mean predicted to be within 10% of the AQS objective. From the annual mean NO_2 concentration isopleths presented in Figure 3.3-3.5, it can be seen that the extent of the predicted exceedances of the annual mean objective are similar to the existing AQMA boundary.

Table 3.2 – AQMA 1, Summary of Modelled Receptor Results (NO_2)

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective (µg/m³)	2018 Annual Mean NO_2 (µg/m³)	% of AQS objective
1|1	572517	158317	1.5	40	24.0	60.0%
1|2	572556	158400	1.5	40	27.7	69.2%
1|3	572130	158620	1.5	40	**44.8**	112.0%
1|4	571855	158712	1.5	40	**50.4**	126.1%
1|5	571742	158690	1.5	40	**42.9**	107.1%
1|6	571578	158632	1.5	40	24.6	61.4%
1|7	570320	158789	1.5	40	24.5	61.2%
1|8	570500	159382	1.5	40	30.7	76.8%
1|9	570640	159555	1.5	40	29.3	73.2%
1|10	570712	159684	1.5	40	24.2	60.6%
1|11	569534	159194	1.5	40	34.4	86.1%
1|12	569736	159233	1.5	40	38.3	95.8%
1|13	570016	159139	1.5	40	**41.3**	103.2%
1|14	572930	158854	1.5	40	23.3	58.4%
1|15	572854	158803	1.5	40	28.3	70.8%
1|16	572720	158703	1.5	40	24.3	60.6%
1|17	572519	158603	1.5	40	30.5	76.3%
1|18	572314	158653	1.5	40	30.9	77.2%
1|19	572176	158538	1.5	40	**44.7**	111.7%
1|20	571942	158596	1.5	40	35.5	88.7%
1|21	571816	158660	1.5	40	**41.6**	104.1%
1|22	571999	158652	1.5	40	**51.6**	129.1%
1|23	571667	158664	1.5	40	28.3	70.8%
1|24	571564	158572	1.5	40	23.7	59.3%
1|25	573236	158002	1.5	40	31.5	78.7%
1|26	573333	158280	1.5	40	**59.0**	147.6%
1|27	572620	158564	1.5	40	32.2	80.6%
1|28	570343	158746	1.5	40	26.1	65.1%
1|29	570346	158845	1.5	40	29.6	73.9%
1|30	570321	158896	1.5	40	25.6	64.0%
1|31	570332	158943	1.5	40	31.4	78.6%
1|32	570374	158940	1.5	40	34.2	85.5%
1|33	570392	159034	1.5	40	**44.4**	111.0%
1|34	570424	159099	1.5	40	32.5	81.4%
1|35	570479	159274	1.5	40	27.7	69.1%
1|36	570407	159407	1.5	40	21.5	53.7%
1|37	570562	159495	1.5	40	26.9	67.2%
1|38	570647	159609	1.5	40	25.9	64.7%
1|39	570772	159690	1.5	40	32.8	82.0%

Figure 3.2 – AQMA 1, Modelled Receptor NO_2 Concentrations

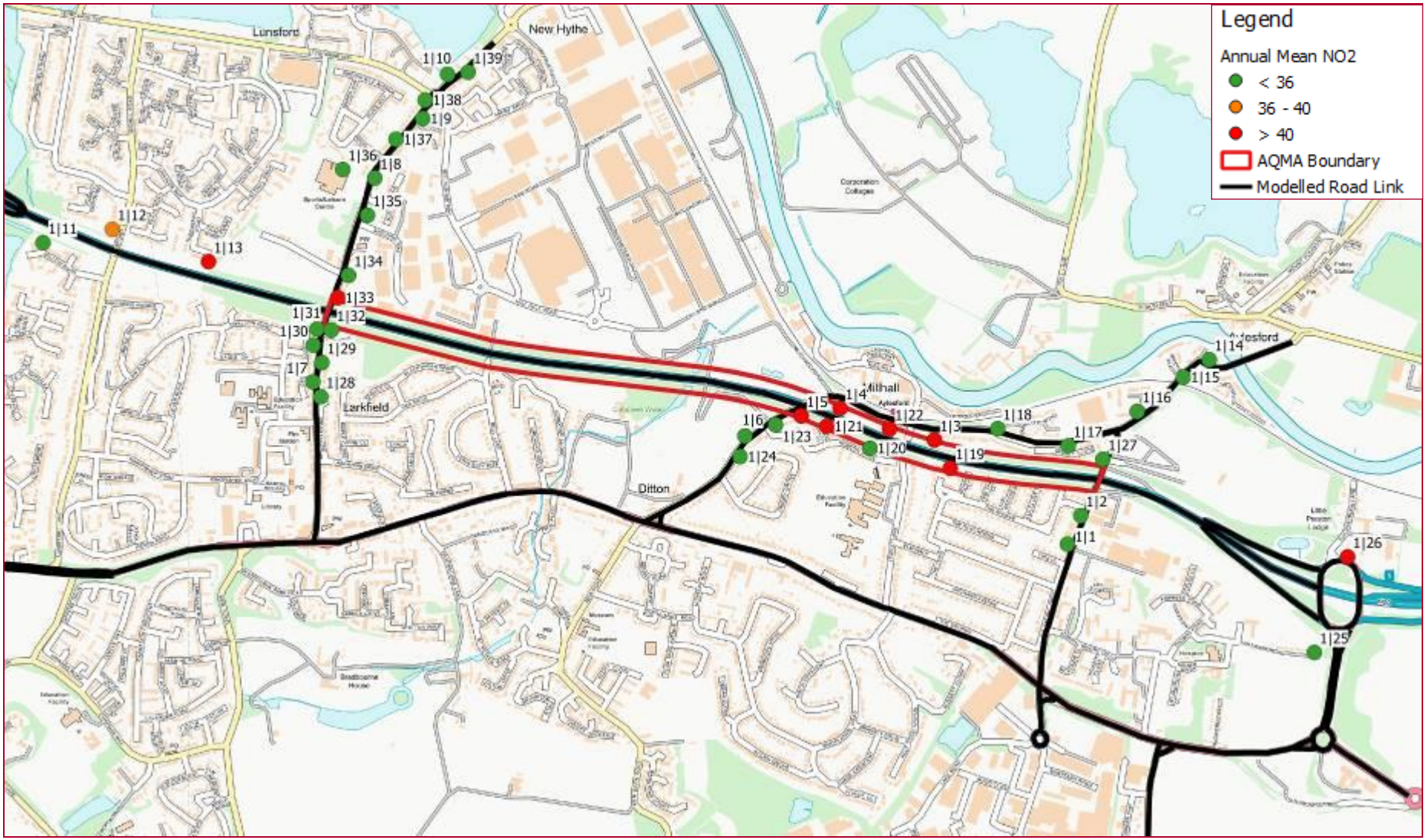


Figure 3.3 – AQMA 1, Modelled NO_2 Concentration Ispoleths, Western Section

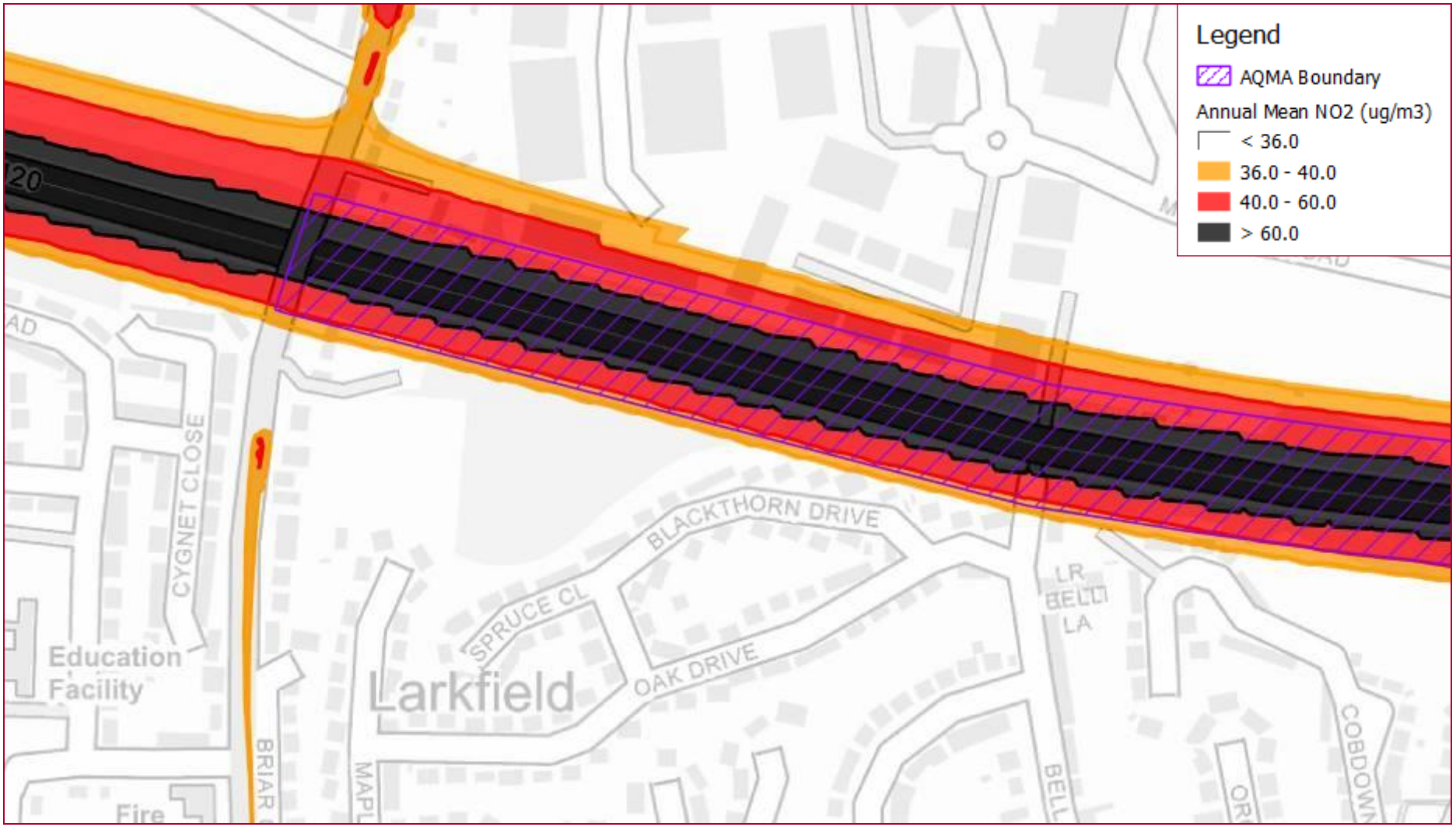


Figure 3.4 – AQMA 1, Modelled NO_2 Concentration Ispoleths, Central Section

Figure 3.5 – AQMA 1, Modelled NO_2 Concentration Ispoleths, Eastern Section

3.1.3 Daily PM_{10}

Table 3.3 provides the modelled mean 24-hour PM_{10} concentrations that are in exceedance of 50µg/m^3, the AQS objective in terms of 24-hour concentrations is that the concentration of 50µg/m^3 should not be exceeded more than 35 times within a calendar year. The AQS objective was not exceeded at any of the modelled receptor locations, the maximum number of 24-hour mean concentrations greater than 50µg/m^3 was 17 predicted at receptor 26.

Table 3.3 – AQMA 1, Summary of Modelled Receptor Results (PM_{10})

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS Objective (Daily Means > 50µg/m^3)	2018 Daily Means > 50µg/m^3	% of AQS objective
1|1	572517	158317	1.5	35	3	8.6%
1|2	572556	158400	1.5	35	4	11.4%
1|3	572130	158620	1.5	35	7	20.0%
1|4	571855	158712	1.5	35	9	25.7%
1|5	571742	158690	1.5	35	7	20.0%
1|6	571578	158632	1.5	35	3	8.6%
1|7	570320	158789	1.5	35	4	11.4%
1|8	570500	159382	1.5	35	4	11.4%
1|9	570640	159555	1.5	35	3	8.6%
1|10	570712	159684	1.5	35	2	5.7%
1|11	569534	159194	1.5	35	4	11.4%
1|12	569736	159233	1.5	35	5	14.3%
1|13	570016	159139	1.5	35	5	14.3%
1|14	572930	158854	1.5	35	3	8.6%
1|15	572854	158803	1.5	35	4	11.4%
1|16	572720	158703	1.5	35	3	8.6%
1|17	572519	158603	1.5	35	4	11.4%
1|18	572314	158653	1.5	35	4	11.4%
1|19	572176	158538	1.5	35	7	20.0%
1|20	571942	158596	1.5	35	5	14.3%
1|21	571816	158660	1.5	35	6	17.1%
1|22	571999	158652	1.5	35	9	25.7%
1|23	571667	158664	1.5	35	4	11.4%
1|24	571564	158572	1.5	35	3	8.6%
1|25	573236	158002	1.5	35	5	14.3%
1|26	573333	158280	1.5	35	17	48.6%
1|27	572620	158564	1.5	35	5	14.3%
1|28	570343	158746	1.5	35	4	11.4%
1|29	570346	158845	1.5	35	5	14.3%
1|30	570321	158896	1.5	35	4	11.4%
1|31	570332	158943	1.5	35	4	11.4%
1|32	570374	158940	1.5	35	5	14.3%
1|33	570392	159034	1.5	35	6	17.1%
1|34	570424	159099	1.5	35	3	8.6%
1|35	570479	159274	1.5	35	3	8.6%
1|36	570407	159407	1.5	35	2	5.7%
1|37	570562	159495	1.5	35	3	8.6%
1|38	570647	159609	1.5	35	2	5.7%
1|39	570772	159690	1.5	35	4	11.4%

3.2 AQMA 2 – Ditton

3.2.1 Council Monitoring Data

AQMA 2 incorporates an area in Ditton covering the Station Road/London Road A20 crossroads, and there are currently three diffusion tube monitoring sites located within the AQMA. Figure 3.6 illustrates the locations of the diffusion tube monitoring sites in the modelled area and monitoring results for the previous five years are detailed in Table 3.4. It can be seen that there have not been any exceedances of the annual mean NO_2 AQS objective within, the AQMA for the past five years. The monitoring site DF4, 5, 6 has recorded the highest annual mean concentration within the AQMA since 2015 when monitoring began at this location.

Table 3.4 – Passive NO_2 Monitoring Within, and Close to AQMA 2

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration ($\mu g/m^3$)[1]				
						2014	2015	2016	2017	2018
TN47	UB	571399	158375	23	YES	19.1	18.8	19.6	19.6	18.0
TN105	R	571305	158412	11.8	YES	-	-	25.8	24.1	21.2
DF4, 5, 6	R	571139	158427	1.9	YES	-	33.1	33.1	31.9	32.0

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m^3
Bias Adjustment Factors listed with relevant year
R= Roadside; UB = Urban Background

3.2.2 Annual Mean NO_2

Table 3.15 provides the annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. There were no exceedances of the annual mean NO_2 objective at any of the 13 modelled receptor locations. The maximum annual mean concentration was 29.6µg/m^3 predicted at receptor 2, this equates to 75% of the annual mean objective. In addition, Figure 3.8 presents that all predicted concentrations above 36µg/m^3 are predicted to be within the road link and not at any locations of relevant exposure.

Table 3.5 – AQMA 2, Summary of Modelled Receptor Results

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective ($\mu g/m^3$)	2018 Annual Mean NO_2 ($\mu g/m^3$)	% of AQS objective
2|1	571306	158412	1.5	40	24.8	61.9%
2|2	571356	158377	1.5	40	29.6	74.0%
2|3	571183	158402	1.5	40	25.8	64.5%
2|4	571502	158488	1.5	40	22.0	55.0%
2|5	571399	158428	1.5	40	23.5	58.7%
2|6	571228	158383	1.5	40	25.5	63.8%
2|7	571283	158353	1.5	40	22.8	57.0%
2|8	571353	158342	1.5	40	24.7	61.7%
2|9	571401	158375	1.5	40	25.0	62.4%
2|10	571574	158329	1.5	40	24.5	61.3%
2|11	571624	158254	1.5	40	20.6	51.5%
2|12	571773	158210	1.5	40	24.1	60.3%
2|13	571919	158172	1.5	40	27.7	69.3%

Figure 3.6 – AQMA 2, Modelled Roads and Monitoring Locations

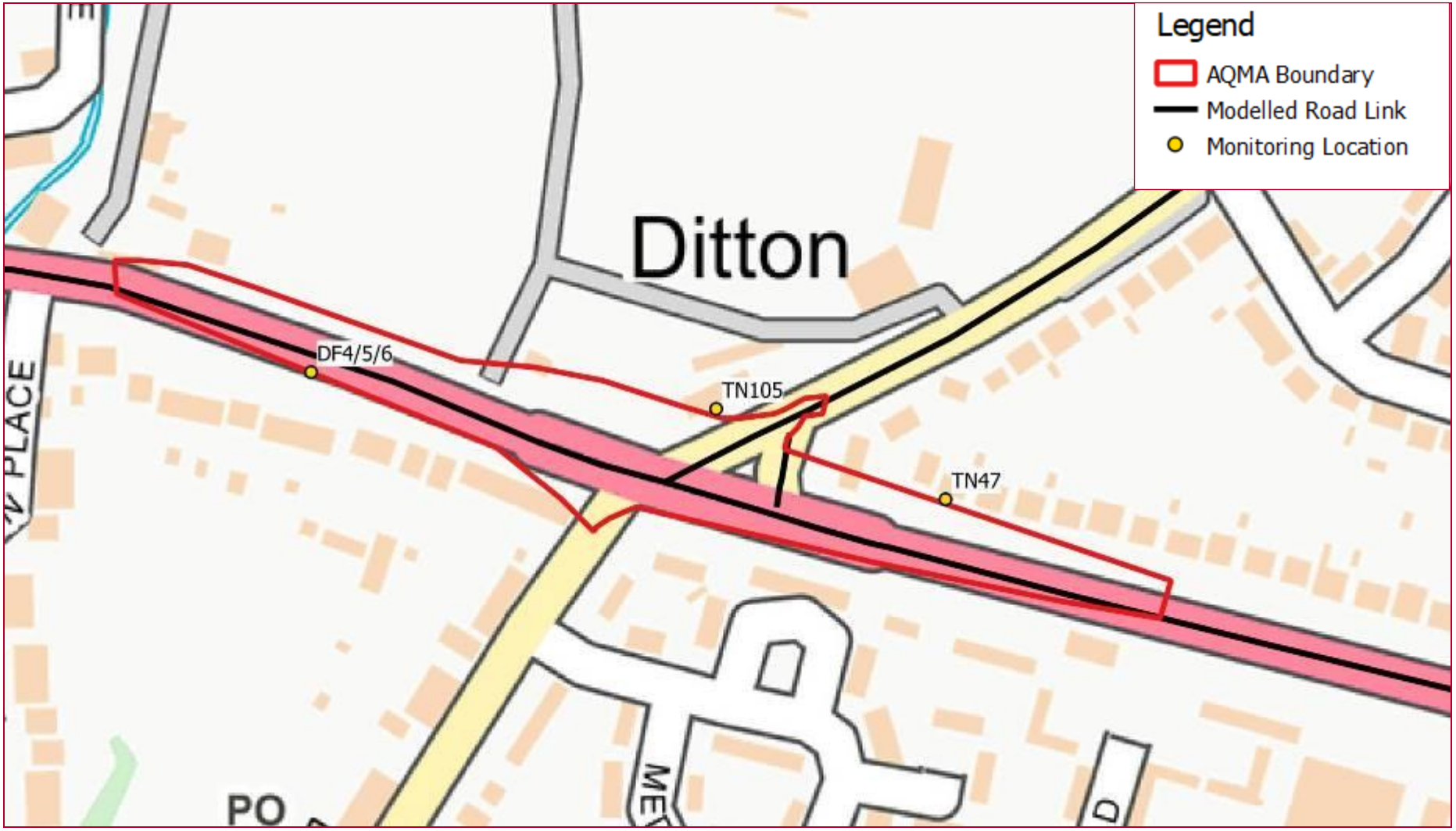


Figure 3.7 – AQMA 2, Modelled Receptor NO_2 Concentrations

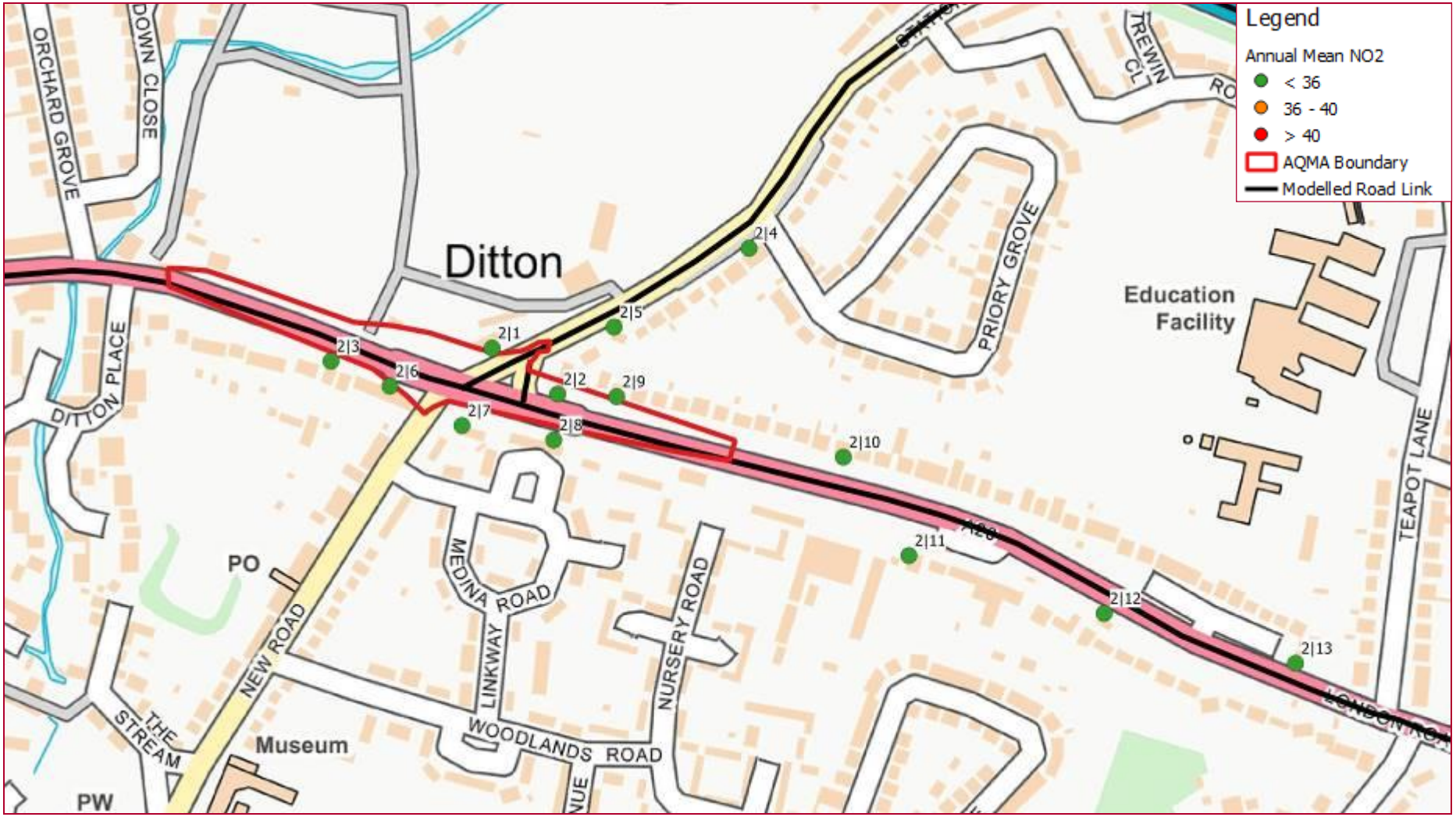


Figure 3.8 – AQMA 2, Modelled NO_2 Concentration Isopleths

3.3 AQMA 3 – Tonbridge High Street

3.3.1 Council Monitoring Data

AQMA 3 incorporates Tonbridge High Street, between New Wharf Road and the High Street/Vale Road roundabout in Tonbridge. There are currently seven diffusion tube monitoring sites located within, or close to the AQMA's area. In addition, historically the automatic site ZT5 has been located within the AQMA, this monitor was relocated to Wateringbury (AQMA 4) part way through 2018[8]. Figure 3.9 illustrates the locations of the monitoring sites within and close to the modelled area and monitoring results for the previous five years are detailed in Table 3.6.

2018 has been the first year over the previous five where there have not been any exceedances of the annual mean objective, it should be noted that the concentration at ZT5 has been annualised due to the monitor being moved to Wateringbury part way through the year. The number of monitoring sites that has exceeded the annual mean objective has reduced from four in 2014, to three in 2015, to two in 2017 and as stated above there were no exceedances in 2018.

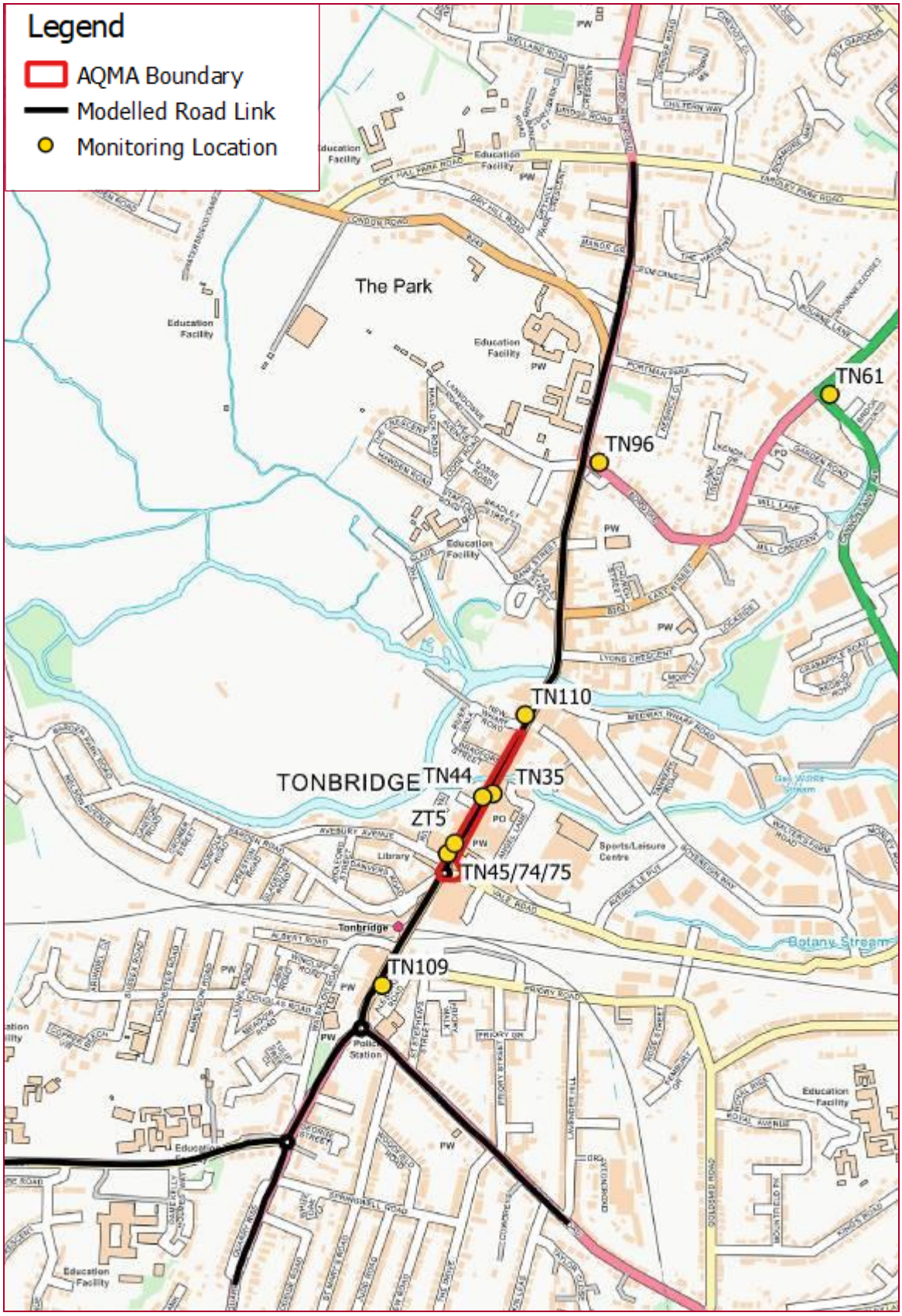
Table 3.6 – Passive and Automatic NO_2 Monitoring Within, and Close to AQMA 3

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration ($\mu g/m^3$)[1]				
						2014	2015	2016	2017	2018
TN35	UC	558948	146277	3.8	YES	**43.2**	36.7	34.6	37.5	36.4
TN44	UC	558929	146271	3.3	YES	**42.0**	**40.1**	**40.5**	38.4	35.2
ZT5*	UC	558877	146185	2.2	YES	**46.6**	**45.8**	**46.8**	**49.6**	34.9
TN45, 74, 75	UC	558864	146166	2.3	YES	**42.7**	**41.6**	**40.5**	**42.3**	39.0
TN61	R	559572	147017	6	NO	23.3	23.4	23.4	22.5	21.6
TN96	R	559145	146891	3.5	NO	34.9	33.3	34.0	30.5	30.1
TN110	R	559008	146423	4.6	YES	-	-	30.1	32.8	28.4
TN109	R	558743	145922	4	NO	-	-	36.0	34.3	33.9

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m^3
Bias Adjustment Factors listed with relevant year
R= Roadside; UC = Urban Centre
* The ZT5 automatic monitor was relocated from Tonbridge High Street to Wateringbury in June 2018

[8] ZT5 required annualisation in line with the LAQM TG.16 guidance for 2018 data.

Figure 3.9 – AQMA 3, Modelled Roads and Monitoring Locations



3.3.2 Annual Mean NO_2

Table 3.7 provides the annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. Of the 28 modelled receptor locations, an exceedances of the annual mean NO_2 objective has only been predicted at one location that is outside of the existing AQMA, and one further receptor, also outside of the existing AQMA, had an annual mean predicted to be within 10% of the AQS objective. There were no predicted exceedances of the annual mean objective within the AQMA.

It should be noted that receptors have been modelled at relevant heights in terms of relevant exposure derived from Box 1.1 of LAQM.TG(16)[1]. The majority of relevant exposure located on Tonbridge High Street is located at first floor height due to commercial premises at ground floor level. The changes in annual mean concentration in terms of height (1.5m and 3m) are presented within Figure 3.11 and Figure 3.12. At a receptor height of 1,5m exceedances of the annual mean objective run adjacent with Tonbridge High Street throughout the AQMA. When the receptor height is increased to 3m all exceedances are contained within the boundary of the road link.

Table 3.7 – AQMA 3, Summary of Modelled Receptor Results

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective (µg/m³)	2018 Annual Mean NO_2 (µg/m³)	% of AQS objective
3|1	557480	145156	1.5	40	13.3	33.3%
3|2	557578	145378	1.5	40	14.4	35.9%
3|3	557923	145602	1.5	40	14.4	36.0%
3|4	558548	145653	1.5	40	21.1	52.8%
3|5	558659	145782	3	40	30.5	76.4%
3|6	558661	145787	1.5	40	36.4	91.0%
3|7	558666	145791	5	40	24.5	61.3%
3|8	558706	145900	3	40	26.5	66.4%
3|9	558737	145952	3	40	25.2	63.0%
3|10	558834	146135	3	40	23.4	58.6%
3|11	558903	146241	3	40	25.2	62.9%
3|12	558953	146290	3	40	33.4	83.6%
3|13	559005	146384	3	40	35.5	88.9%
3|14	559012	146428	3	40	29.3	73.3%
3|15	559080	146639	3	40	34.5	86.1%
3|16	559072	146759	3	40	25.8	64.6%
3|17	559124	146914	3	40	35.9	89.7%
3|18	559113	146931	1.5	40	29.9	74.8%
3|19	559194	147194	3	40	31.1	77.8%
3|20	559197	147202	1.5	40	35.5	88.8%
3|21	559195	147335	1.5	40	25.8	64.4%
3|22	559214	147367	1.5	40	**40.5**	101.1%
3|23	558503	145431	1.5	40	29.0	72.6%
3|24	558776	145792	1.5	40	32.8	82.1%
3|25	558799	145745	1.5	40	22.2	55.6%
3|26	558859	145689	1.5	40	22.6	56.5%
3|27	558941	145634	1.5	40	29.3	73.3%
3|28	559016	145535	1.5	40	20.7	51.8%

Figure 3.10 – AQMA 3, Modelled Receptor NO_2 Locations

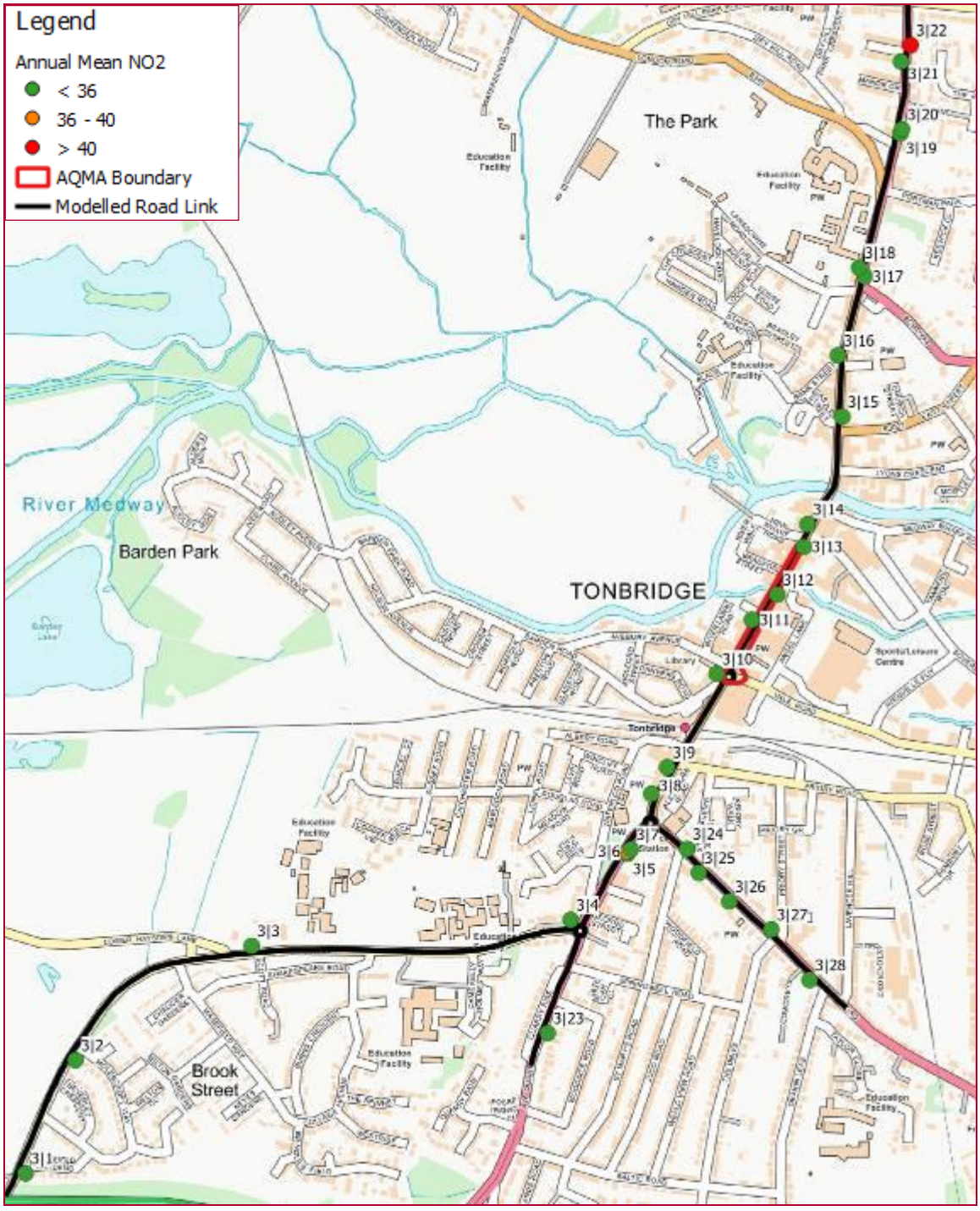


Figure 3.11 – AQMA 3, Modelled NO_2 Concentration Ispoleths (1.5m Height)

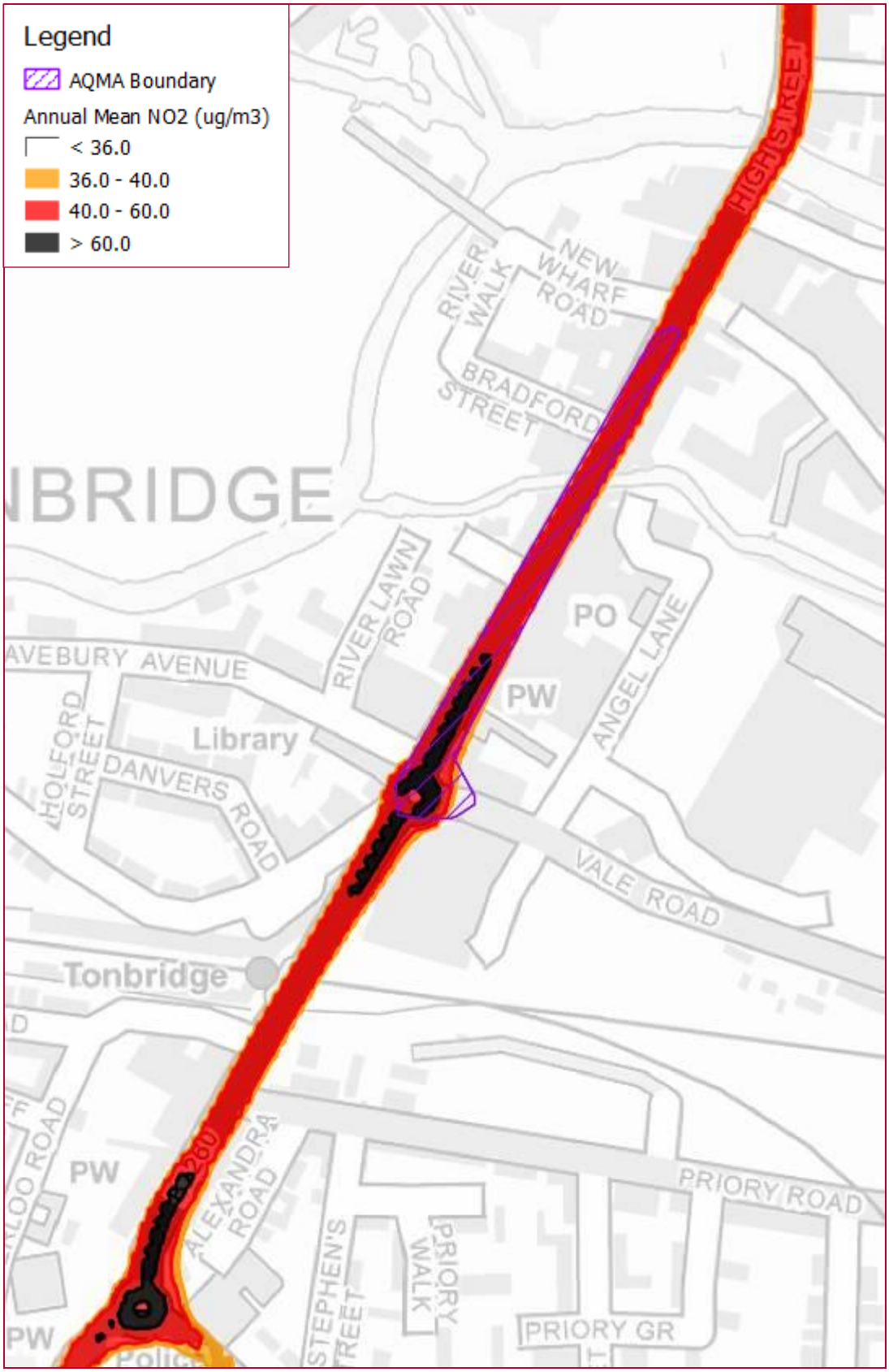
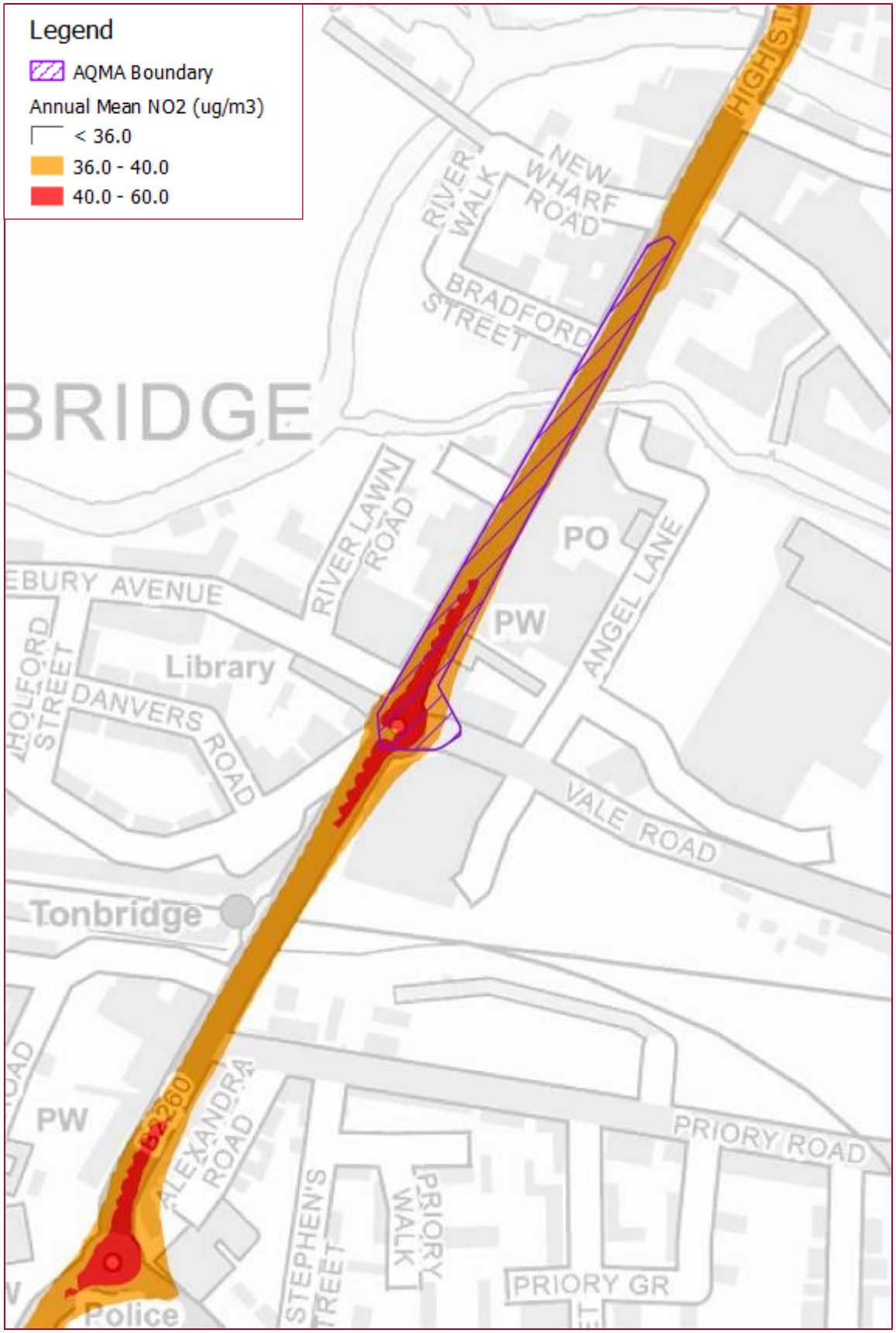


Figure 3.12 – AQMA 3, Modelled NO_2 Concentration Ispoleths (3m Height)



3.4 AQMA 4 – Wateringbury

3.4.1 Council Monitoring Data

AQMA 4 incorporates the Red Hill/Tonbridge Road A26 crossroads in Wateringbury. There are currently five diffusion tube sites located within, or close to the AQMA's area. In addition the automatic site ZT7, was established part way through 2018[9] after being relocated from Tonbridge High Street (ZT5). Figure 3.13 illustrates the locations of the monitoring sites within and close to the modelled area and monitoring results for the previous five years are detailed in Table 3.8.

Within AQMA 4 two monitoring sites have exceeded the annual mean objective for the past five years, with concentrations in excess of 60µg/m^3 experienced between 2014 and 2017 at site TN42, 76, 77. Between 2014 and 2018 there has been a reduction in annual mean concentration at site TN42, 76, 77 but it remained close to 60µg/m^3 in 2018 (58.1µg/m^3).

Table 3.8 – Passive and Automatic NO_2 Monitoring Within, and Close to AQMA 4

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration (µg/m^3)[1]				
						2014	2015	2016	2017	2018
TN33	R	569201	153486	1.25	YES	**52.7**	**51.9**	**56.4**	**53.6**	**51.9**
TN43	R	569187	153498	2.6	YES	38.2	38.2	39.1	38.7	35.7
TN42, 76, 77	R	569226	153475	1.3	YES	**64.8**	**63.5**	**64.8**	**61.3**	**58.1**
TN108	R	569056	153537	4	NO	-	-	23.0	23.7	20.9
TN115, TN116, TN117	R	569165	153493	1	YES	-	-	-	-	19.9
ZT7*	R	569165	153493	0.2	YES	-	-	-	-	23.6

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m^3
Bias Adjustment Factors listed with relevant year
R= Roadside
* The ZT5 automatic monitor was relocated from Tonbridge High Street to Wateringbury in June 2018

[9] ZT7 required annualisation in line with the LAQM TG.16 guidance for 2018 data.

Figure 3.13 – AQMA 4, Modelled Roads and Monitoring Locations

3.4.2 Annual Mean NO_2

Table 3.15 provides the modelled annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. Of the 23 modelled receptor locations, an exceedance of the annual mean NO_2 objective has been predicted at one receptor within the existing AQMA, and a further receptor located close to the boundary of the AQMA had annual mean concentration predicted to be within 10% of the AQS objective. There were no predicted exceedances of the annual mean objective outside of the AQMA.

Employing the same methodology as for AQMA 3, receptors have been modelled at relevant heights in terms of relevant exposure derived from Box 1.1 of LAQM.TG(16)[1]. Receptors 4, 6 and 9 have been modelled at a first floor height due to commercial premises at ground floor level.

From the annual mean NO_2 concentration isopleths presented in Figure 3.15, it can be seen that predicted exceedances of the annual mean objective are of a similar extent to the existing AQMA boundary.

Table 3.9 – AQMA 4, Summary of Modelled Receptor Results

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective (µg/m³)	2018 Annual Mean NO_2 (µg/m³)	% of AQS objective
4|1	569150	153418	1.5	40	23.2	58.1%
4|2	569136	153441	1.5	40	20.4	51.0%
4|3	569180	153466	1.5	40	34.2	85.4%
4|4	569167	153446	3	40	24.6	61.6%
4|5	569153	153495	1.5	40	23.4	58.5%
4|6	569180	153501	3	40	39.5	98.8%
4|7	569171	153508	1.5	40	25.3	63.2%
4|8	569156	153517	1.5	40	25.0	62.5%
4|9	569147	153523	3	40	20.9	52.2%
4|10	569014	153550	1.5	40	17.2	43.0%
4|11	568870	153602	1.5	40	17.6	43.9%
4|12	568598	153611	1.5	40	13.2	33.0%
4|13	567601	153502	1.5	40	14.4	36.0%
4|14	569189	153507	1.5	40	30.6	76.5%
4|15	569209	153529	1.5	40	21.0	52.4%
4|16	569251	153539	1.5	40	20.1	50.2%
4|17	569385	153631	1.5	40	14.7	36.6%
4|18	569209	153487	1.5	40	50.8	126.9%
4|19	569247	153470	1.5	40	32.7	81.7%
4|20	569288	153464	1.5	40	22.8	56.9%
4|21	569499	153409	1.5	40	20.1	50.1%
4|22	569814	153372	1.5	40	18.8	47.1%
4|23	570413	153375	1.5	40	21.4	53.4%

Figure 3.14 – AQMA 4, Modelled Receptor NO_2 Concentrations

Figure 3.15 – AQMA 4, Modelled NO_2 Concentration Ispoleths

3.5 AQMA 5 – Aylesford

3.5.1 Council Monitoring Data

AQMA 5 incorporates the A20 London Road in Aylesford, including the Hall Road and Mills Road Junction. There are currently seven diffusion tube monitoring sites located within, or close to the AQMA's area. Figure 3.16 illustrates the locations of the diffusion tube monitoring sites in the modelled area. Recent results for the monitoring sites are shown in Table 3.10.

Within AQMA 5 two monitoring sites have exceeded the annual mean objective for the past five years (TN60, 62, 63 and DF1, 2, 3), with all other monitoring sites recording compliance with the objective. Both TN60, 62, 63 and DF1, 2, 3 are located close to the Hall Road/Mills Road junction.

Table 3.10 – Passive NO_2 Monitoring Within, and Close to AQMA 5

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration ($\mu g/m^3$)[1]				
						2014	2015	2016	2017	2018
TN68	R	572430	157975	6.6	YES	31.9	30.8	30.8	31.4	28.3
TN104	R	572976	157726	8.2	YES	-	-	37.3	32.8	35.5
TN60, 62, 63	R	572423	157932	6.5	YES	**45.3**	**44.1**	**44.8**	**44.8**	**41.7**
DF1, 2, 3	R	572459	157904	2.5	YES	**-**	**42.6**	**44.3**	**44.1**	**40.1**
TN100	R	572998	156292	6.2	NO	21.5	21.8	22.9	24.4	21.4
TN102	R	572768	157186	14.5	NO	19.4	19.3	20.0	23.0	19.0
TN103	R	572739	157532	9.5	NO	20.6	20.9	23.9	21.5	21.7

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m^3
Bias Adjustment Factors listed with relevant year
R= Roadside

3.5.2 Annual Mean NO_2

Table 3.15 provides the modelled annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. Of the 16 modelled receptor locations, there was one predicted exceedance of the annual mean NO_2 objective (receptor 6), and one additional receptor had an annual mean concentration predicted to be within 10% of the AQS objective. Receptor 6 is located at a residential property close to the Hall Road/Mills Road junction.

From the annual mean NO_2 concentration isopleths presented in Figure 3.18, it can be seen that predicted exceedances of the annual mean objective are limited to the Hall Road/Mills Road junction. The only relevant receptor within the predicted exceedance area is the residential property at which receptor 6 has been located.

Table 3.11 – AQMA 5, Summary of Modelled Receptor Results

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective ($\mu g/m^3$)	2018 Annual Mean NO_2 ($\mu g/m^3$)	% of AQS objective
5|1	572996	156318	1.5	40	25.2	63.1%
5|2	572801	157090	1.5	40	22.5	56.2%
5|3	572741	157529	1.5	40	23.9	59.7%
5|4	572980	157726	1.5	40	34.0	84.9%
5|5	572782	157764	1.5	40	30.8	76.9%
5|6	572431	157922	1.5	40	**46.5**	116.2%
5|7	572431	157974	1.5	40	27.8	69.5%
5|8	572463	158052	1.5	40	28.3	70.6%
5|9	572526	158323	1.5	40	25.5	63.7%
5|10	572556	158400	1.5	40	27.7	69.2%

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective (µg/m³)	2018 Annual Mean NO_2 (µg/m³)	% of AQS objective
5|11	572421	157839	1.5	40	29.6	74.0%
5|12	572453	157797	1.5	40	38.9	97.1%
5|13	572497	157923	1.5	40	27.2	67.9%
5|14	572616	157879	1.5	40	23.2	58.1%
5|15	572452	157954	1.5	40	30.6	76.4%
5|16	573339	157664	1.5	40	24.2	60.6%

Figure 3.16 – AQMA 5, Modelled Roads and Monitoring Locations

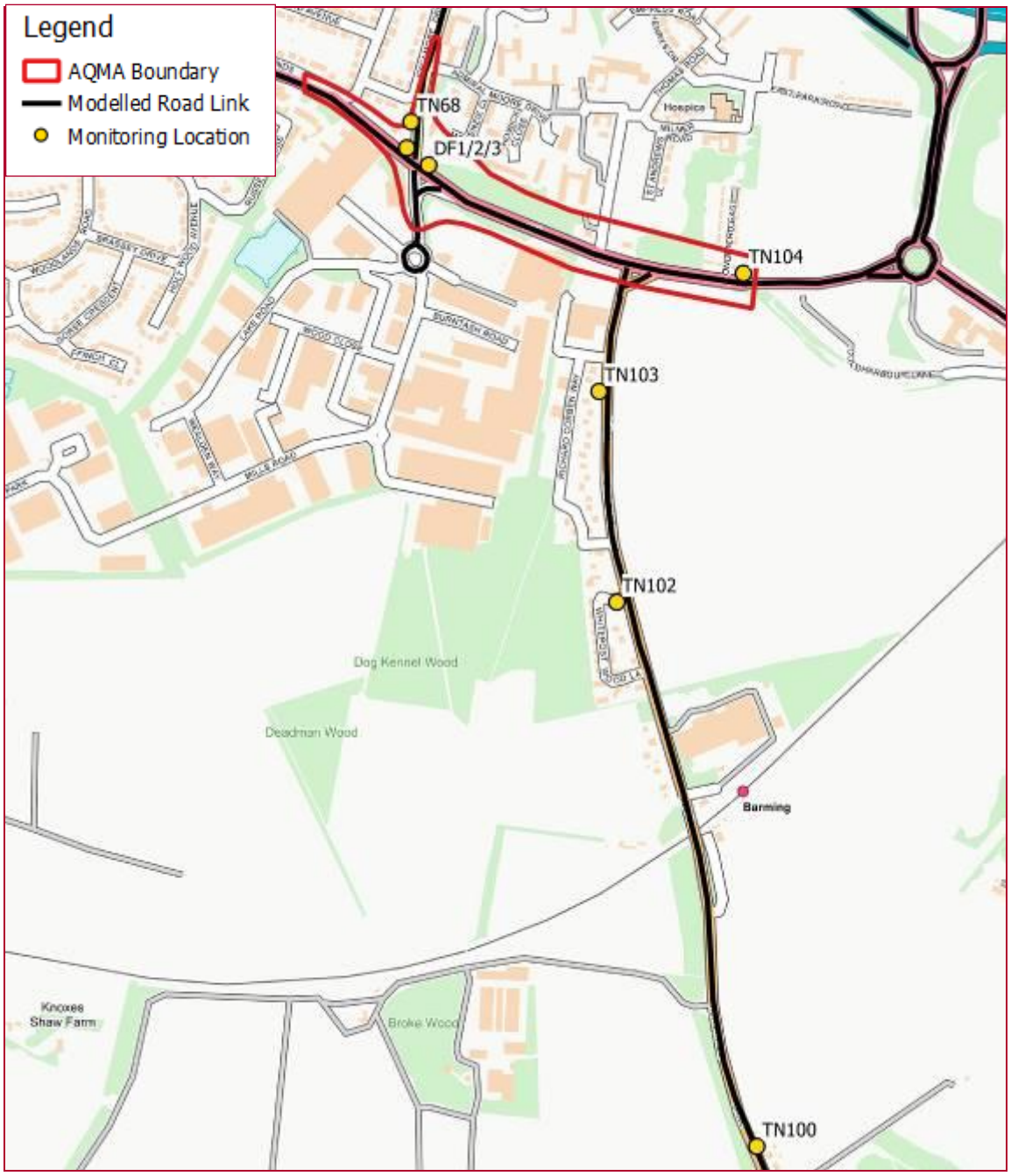


Figure 3.17 – AQMA 5, Modelled Receptor NO_2 Concentrations

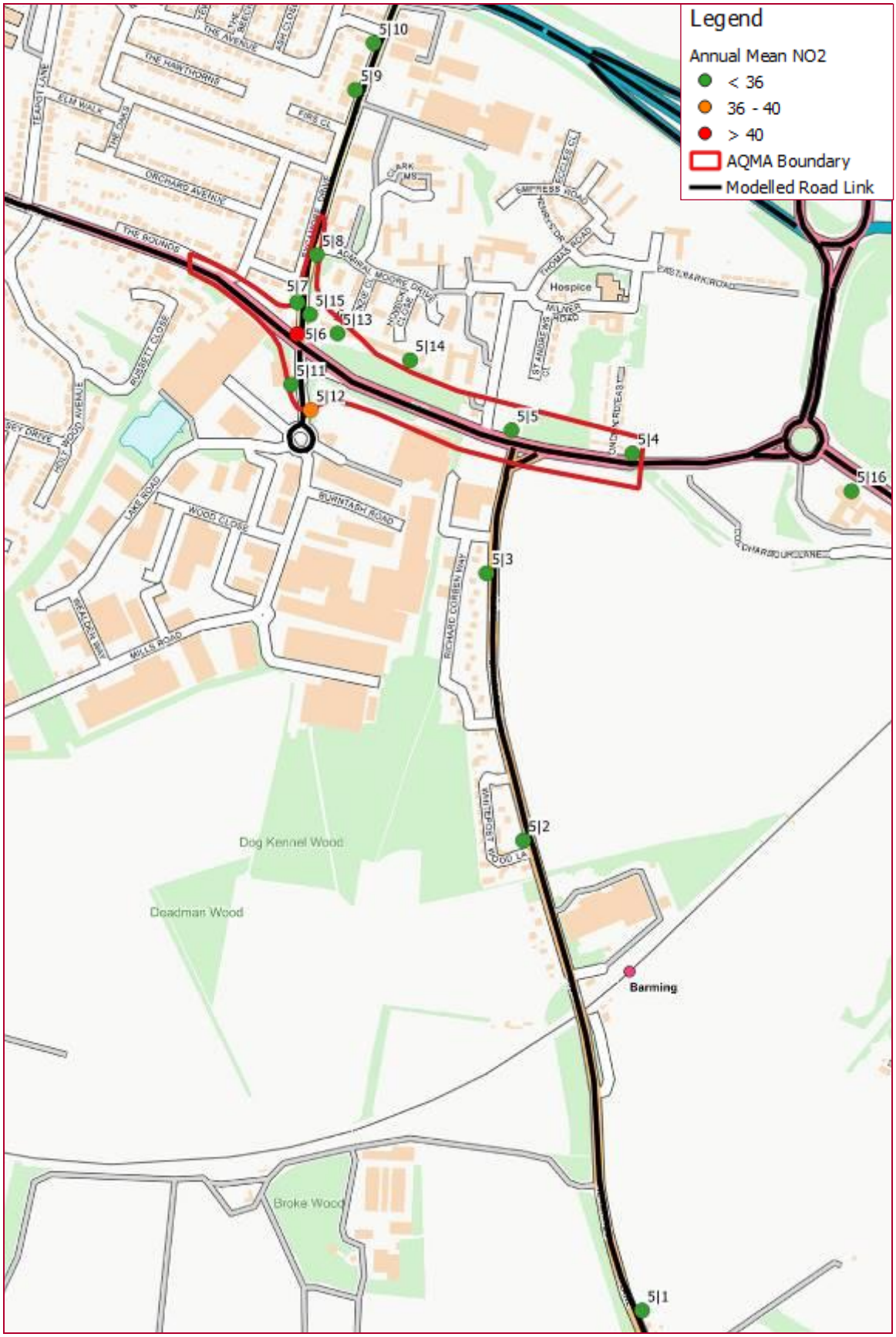


Figure 3.18 – AQMA 5, Modelled NO_2 Concentration Ispoleths

3.6 AQMA 6 – Larkfield

3.6.1 Council Monitoring Data

AQMA 6 encompasses the A20 London Road in East Malling, Larkfield and Ditton, including the New Hythe Lane junction. There are currently four diffusion tube sites located within the AQMA's modelled area. Figure 3.19 illustrates the locations of the diffusion tube monitoring sites in the modelled area. Recent results for the monitoring sites are shown in Table 3.12.

Within AQMA 6 monitoring site TN106 has exceeded the annual mean objective for the past three years, with all other monitoring sites recording compliance with the objective from 2017. TN106 is located on a residential façade therefore is sited at a location of relevant explore in relation to NO_2 annual mean concentrations

Table 3.12 – Passive NO_2 Monitoring Within, and Close to AQMA 6

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration ($\mu g/m^3$)[1]				
						2014	2015	2016	2017	2018
TN64	R	570948	158482	5	YES	30.6	29.0	31.0	29.4	29.0
TN57, 58, 59	R	570467	158328	4.82	YES	36.5	34.0	33.7	31.4	32.2
DF7, 8, 9	R	570386	158311	1.4	YES	-	35.2	**41.8**	35.0	32.8
TN106	R	570189	158326	2.25	YES	-	-	**43.9**	**43.2**	**42.0**

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m^3
Bias Adjustment Factors listed with relevant year
R= Roadside

3.6.2 Annual Mean NO_2

Table 3.15 provides the annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. There were no exceedances of the annual mean NO_2 objective at any of the nine modelled receptor locations. As stated above the monitoring site TN106 has exceeded the annual mean objective for the past three years, because of a poor correlation within the verification procedure when compared to all other verification monitoring locations, TN106 was removed from the verification calculations. Due to the monitored exceedance at TN106 it has been proposed within Section 5 that the AQMA boundary to the west of New Hythe Lane remain in its current designation.

The maximum annual mean concentration was 34.1µg/m^3 predicted at receptor 1, this equates to 85.3% of the annual mean objective. In addition Figure 3.21 presents that all predicted concentrations above 36µg/m^3 are predicted to be within the road link and not at any locations of relevant exposure.

Table 3.13 – AQMA 6, Summary of Modelled Receptor Results

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective ($\mu g/m^3$)	2018 Annual Mean NO_2 ($\mu g/m^3$)	% of AQS objective
6|1	570816	158457	1.5	40	34.1	85.3%
6|2	570343	158413	1.5	40	32.3	80.7%
6|3	570323	158486	1.5	40	22.8	56.9%
6|4	569884	158302	1.5	40	21.1	52.8%
6|5	569487	158266	1.5	40	27.9	69.8%
6|6	568907	158220	1.5	40	22.6	56.5%
6|7	568702	158298	1.5	40	19.9	49.8%
6|8	569028	158233	1.5	40	20.5	51.3%
6|9	569339	158269	1.5	40	21.5	53.7%

Figure 3.19 – AQMA 6, Modelled Roads and Monitoring Locations

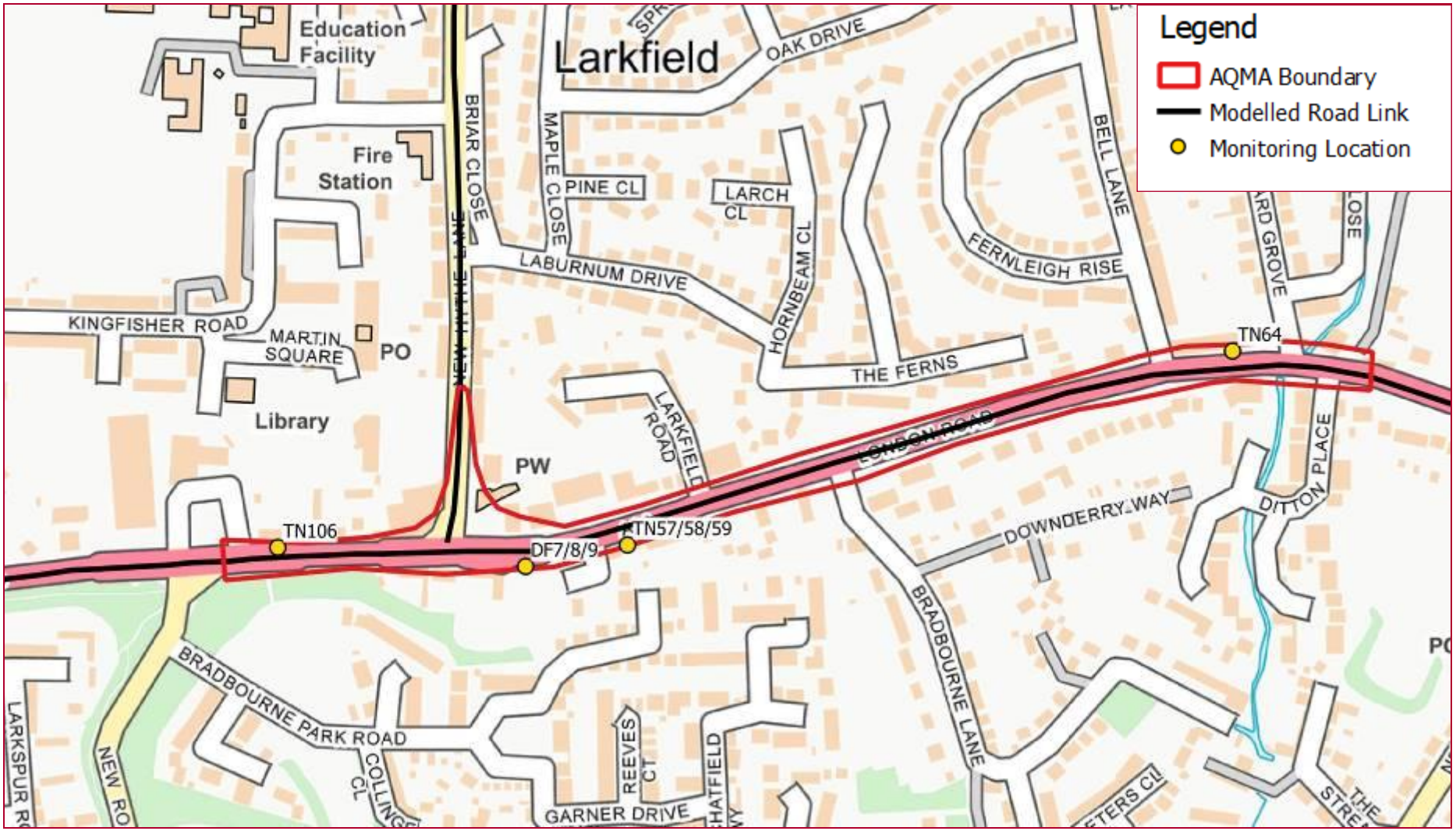


Figure 3.20 – AQMA 6, Modelled Receptor NO_2 Locations

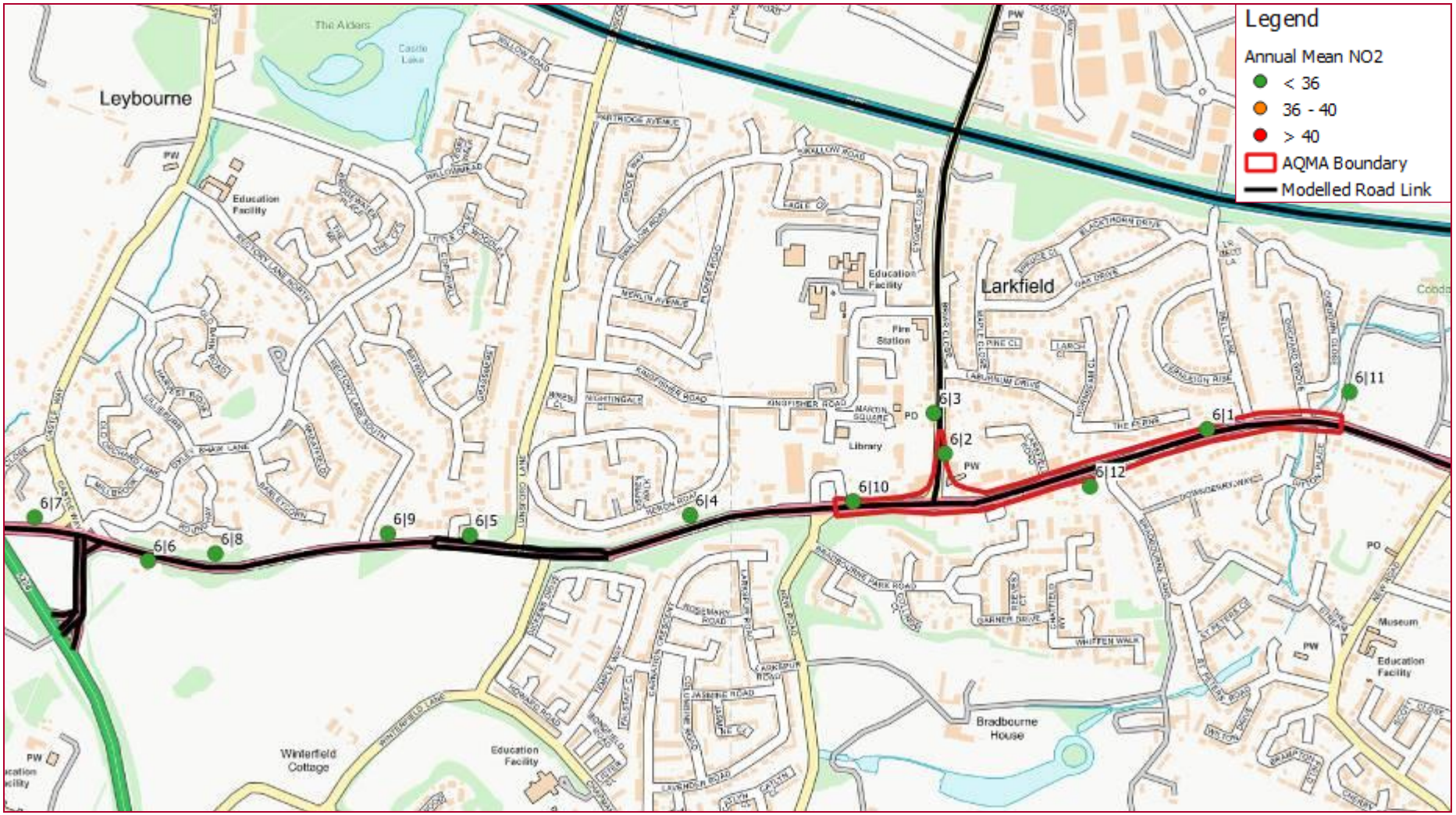


Figure 3.21 – AQMA 6, Modelled NO_2 Concentration Ispoleths

3.7 AQMA 7 – Borough Green

3.7.1 Council Monitoring Data

AQMA 7 includes a number of sections of Sevenoaks Road (A25), Western Road and Borough Green High Street. There are currently 12 diffusion tubes monitoring sites located within or close to the AQMA's modelled area. Figure 3.22 illustrates the locations of the diffusion tube monitoring sites in the modelled area. Recent results for the monitoring sites are shown in Table 3.14.

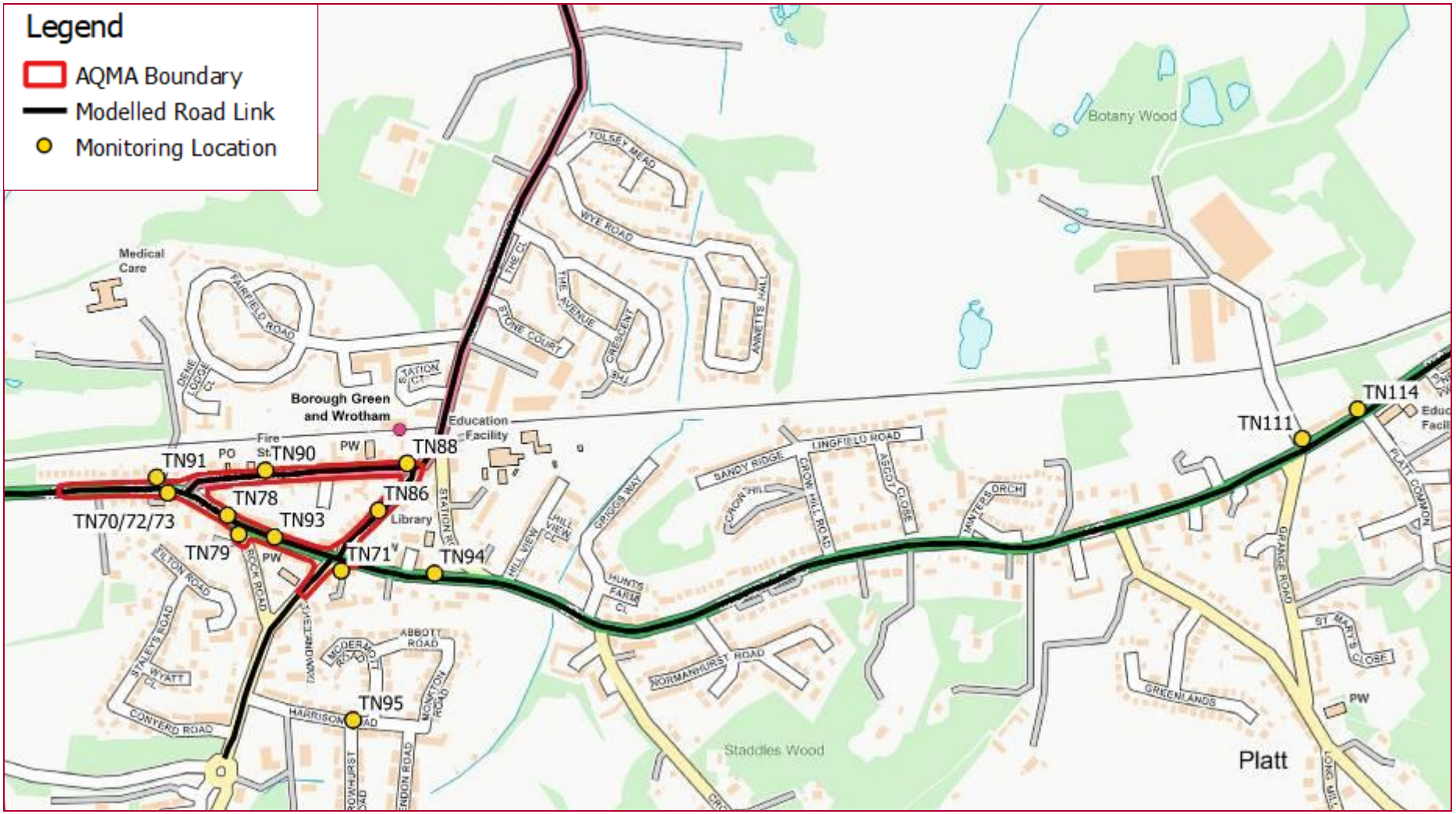
2018 has been the first year over the previous five years where there have not been any exceedances of the annual mean objective, monitoring site TN70, 72, 73 remained within 10% of the objective with 2018. Aside from sites TN70, 72, 73 and TN93, there have not been any annual mean concentrations above 30µg/m^3 since 2016.

Table 3.14 – Passive NO_2 Monitoring Within, and Close to AQMA 7

Site	Site Type	OS Grid Ref X	OS Grid Ref Y	Distance to Road (m)	Located In AQMA	Annual Mean NO_2 Concentration (µg/m^3)[1]				
						2014	2015	2016	2017	2018
TN78	R	560654	157296	3.1	YES	-	-	33.6	28.7	27.8
TN79	R	560670	157269	7.2	YES	29.3	29.0	31.2	27.6	25.7
TN86	UC	560869	157303	2.46	YES	24.6	22.6	25.0	24.5	22.0
TN88	R	560910	157370	4.3	YES	24.9	23.8	26.8	23.5	22.2
TN90	R	560708	157360	4.5	YES	24.2	22.2	25.7	25.6	22.7
TN93	R	560721	157265	1.5	YES	34.8	34.0	39.8	35.8	34.6
TN94	R	560949	157213	4.3	NO	29.1	28.1	28.5	27.3	24.3
TN114	R	562264	157447	6.5	NO	-	-	26.1	22.3	20.1
TN70, 72, 73	R	560569	157328	2.06	YES	**42.2**	**42.1**	**45.6**	**43.0**	39.6
TN111	R	562185	157405	2.2	NO	-	-	-	-	16.9
TN95	UB	560833	157004	1.7	NO	15.3	14.8	16.1	14.6	13.6
TN91	R	560553	157350	14.2	YES	18.4	16.5	18.6	18.2	16.3

In **bold**, exceedance of the annual mean NO_2 AQS objective of 40µg/m^3
Bias Adjustment Factors listed with relevant year
R= Roadside; UC = Urban Centre; UB = Urban Background

Figure 3.22 – AQMA 7, Modelled Roads and Monitoring Locations



3.7.2 Annual Mean NO_2

Table 3.15 provides the annual mean NO_2 concentrations predicted at existing residential receptor locations for 2018. Of the 49 modelled receptor locations, all receptor locations were predicted to be in compliance with the annual mean NO_2 objective, and there was one receptor predicted to have an annual mean to be within 10% of the AQS objective.

The concentration isopleths presented in Figure 3.25 show that the concentrations in exceedance of the annual mean objective are mostly predicted to be within the road links, with relevant exposure only within the exceedance isopleths on Sevenoaks Road to the west of the AQMA close to receptor 3 and diffusion tube TN70, 72, 73.

Table 3.15 – AQMA 7, Summary of Modelled Receptor Results

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective (µg/m³)	2018 Annual Mean NO_2 (µg/m³)	% of AQS objective
7|1	560399	157344	1.5	40	28.4	71.0%
7|2	560504	157320	1.5	40	28.3	70.7%
7|3	560562	157327	1.5	40	37.7	94.3%
7|4	560581	157322	1.5	40	33.6	83.9%
7|5	560604	157350	1.5	40	27.8	69.4%
7|6	560624	157355	3	40	25.3	63.2%
7|7	560671	157342	1.5	40	24.5	61.2%
7|8	560881	157371	1.5	40	25.5	63.8%
7|9	560912	157358	1.5	40	34.5	86.3%
7|10	560904	157344	3	40	28.7	71.8%
7|11	560918	157331	1.5	40	28.3	70.8%
7|12	560822	157268	1.5	40	30.0	75.0%
7|13	560746	157248	1.5	40	25.3	63.3%
7|14	560782	157252	1.5	40	29.6	73.9%
7|15	560651	157299	1.5	40	33.6	83.9%
7|16	560600	157317	1.5	40	34.6	86.5%
7|17	561036	157620	1.5	40	27.3	68.2%
7|18	561075	157770	1.5	40	22.8	57.0%
7|19	561063	158228	1.5	40	20.6	51.5%
7|20	561196	157143	1.5	40	27.4	68.5%
7|21	561349	157152	1.5	40	22.1	55.4%
7|22	561489	157243	1.5	40	20.4	51.0%
7|23	561781	157238	1.5	40	21.0	52.5%
7|24	561867	157275	1.5	40	27.5	68.8%
7|25	562075	157324	1.5	40	25.4	63.5%
7|26	562209	157420	1.5	40	20.3	50.6%
7|27	562391	157512	1.5	40	25.4	63.5%
7|28	562770	157841	1.5	40	22.9	57.3%
7|29	562949	157947	1.5	40	22.0	55.0%
7|30	560786	157225	1.5	40	35.4	88.4%
7|31	560746	157163	1.5	40	24.2	60.5%
7|32	560695	157054	1.5	40	19.5	48.8%
7|33	560663	157003	1.5	40	19.7	49.2%
7|34	560053	157255	1.5	40	21.3	53.2%
7|35	560478	157345	1.5	40	31.4	78.4%
7|36	560692	157282	1.5	40	28.2	70.6%
7|37	560771	157368	1.5	40	22.0	55.0%
7|38	560898	157194	1.5	40	20.0	50.1%
7|39	561025	157185	1.5	40	19.8	49.6%
7|40	561020	157380	1.5	40	16.7	41.8%
7|41	560969	157499	1.5	40	22.9	57.3%
7|42	561021	157679	1.5	40	18.0	44.9%
7|43	561082	157726	1.5	40	24.0	60.0%
7|44	561120	157866	1.5	40	20.3	50.7%

Receptor ID	OS Grid X	OS Grid Y	Height (m)	AQS objective (µg/m³)	2018 Annual Mean NO_2 (µg/m³)	% of AQS objective
7|45	561132	157842	1.5	40	34.3	85.7%
7|46	561082	158262	1.5	40	25.1	62.8%
7|47	561072	158159	1.5	40	18.5	46.2%
7|48	561149	158377	1.5	40	30.5	76.3%
7|49	561106	158626	1.5	40	20.5	51.3%

Figure 3.23 – AQMA 7, Modelled Receptor NO_2 Locations (Wide view)

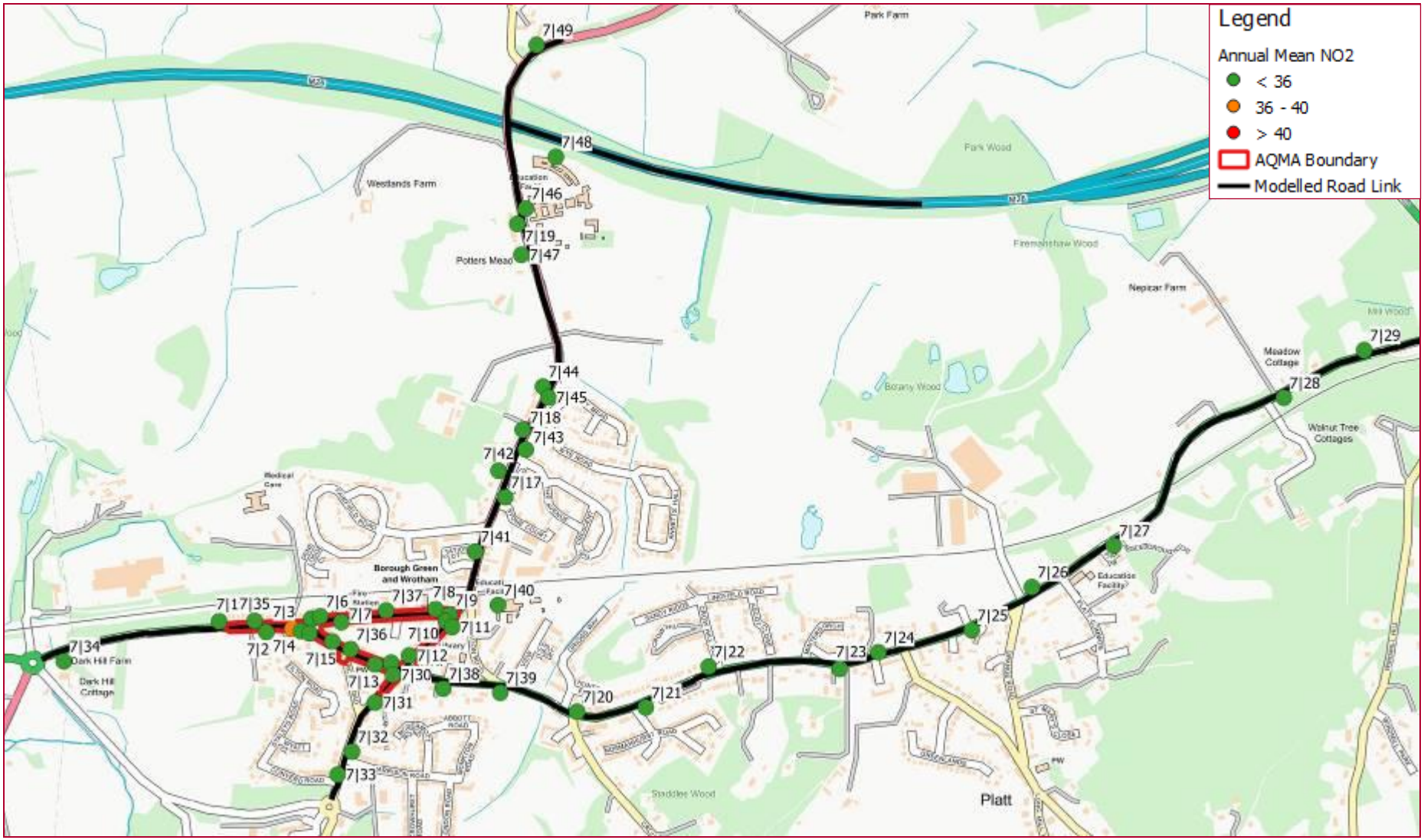


Figure 3.24 – AQMA 7, Modelled Receptor NO_2 Locations (Close up to AQMA)

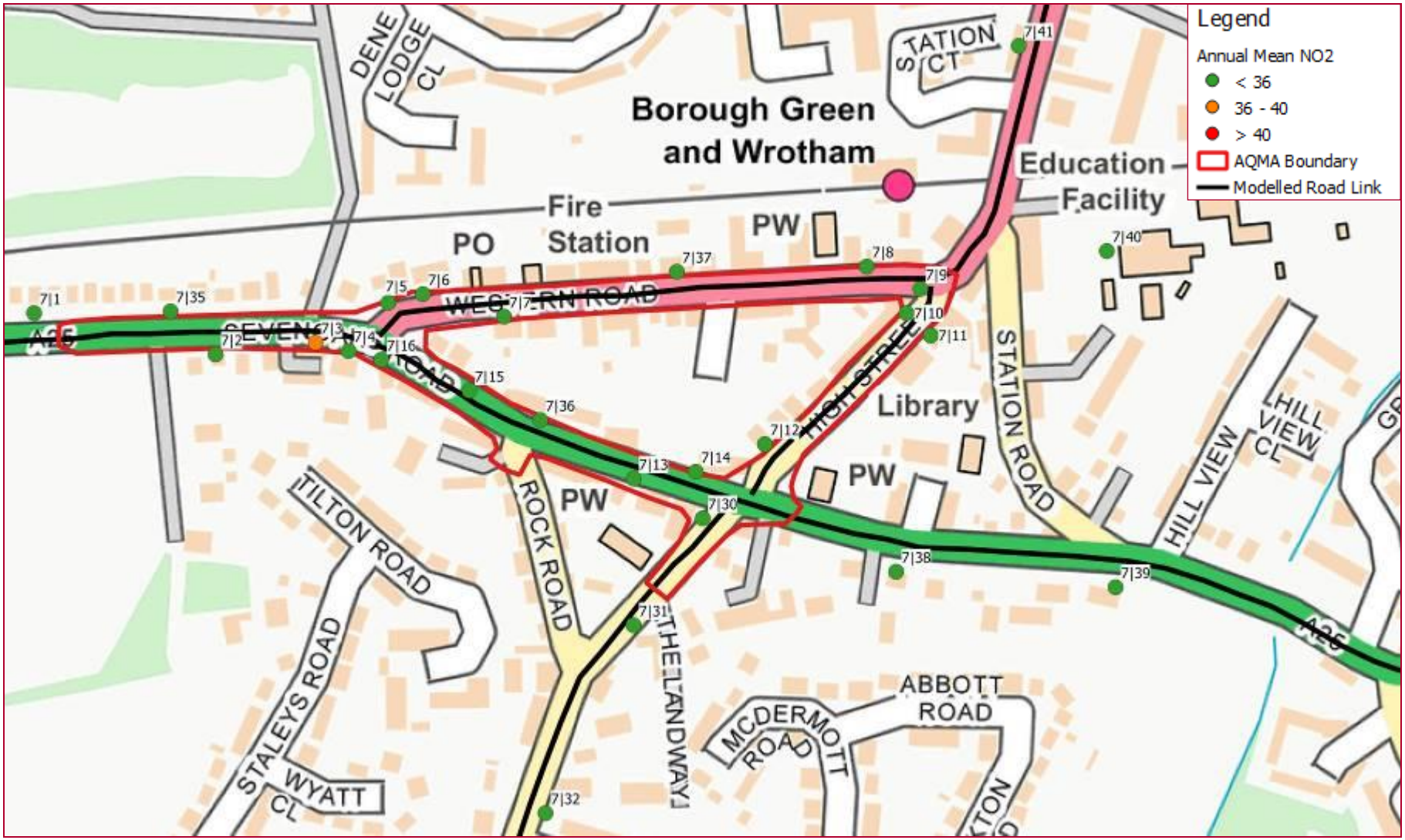


Figure 3.25 – AQMA 7, Modelled NO_2 Concentration Ispoleths

4 Source Apportionment

To help inform the development of measures as part of the action plan stage of the project, NO_x source apportionment exercise was undertaken for the following vehicle classes:

- Cars;
- Light-Goods Vehicles (LGVs);
- Heavy-Goods Vehicles (HGVs);
- Bus and Coaches; and
- Motorcycles.

This provides vehicle contributions of NO_x as a proportion of the total NO_x concentration, which will allow the Council to develop specific AQAP measures targeting a reduction in emissions from specific vehicle types.

It should be noted that emission sources of NO_2 are dominated by a combination of direct NO_2 (f-NO_2) and oxides of nitrogen (NO_x), the latter of which is chemically unstable and rapidly oxidised upon release to form NO_2. Reducing levels of NO_x emissions therefore reduces concentrations of NO_2. As a consequence, the source apportionment study has firstly considered the emissions of NO_x, which are assumed to be representative of the main sources of NO_2, and secondly emissions of NO_2.

With regards to the discrete receptor locations, consideration has been given to the following groups of receptors:

- The average NO_x and NO_2 contributions across all modelled locations. This provides useful information when considering possible action measures to test and adopt. It will however understate road NO_x concentrations in problem areas;
- The average NO_x and NO_2 contributions across all locations with modelled NO_2 concentration greater than 40µg/m^3. This provides an indication of source apportionment in problematic areas (i.e. only where the AQS objective is exceeded). As such, this information should be considered with more scrutiny when testing and adopting action measures;

Table 4.1 details the source apportionment results for NO_x concentrations, whilst Figure 4.1 presents pie charts illustrate the results.

When considering the average NO_x concentration across all modelled receptors, road traffic accounts for 39.4µg/m^3 (61.9%) of total NO_x concentration. Of this 39.4µg/m^3, Cars account for the most (28.8%) of any of the vehicle types, followed by LGVs (17.8%). HGVs and Buses/Coaches account for a similar total road-NO_x, with HGVs at 9.0% (4.3µg/m^3) and Buses/Coaches at 6.1% (2.9µg/m^3), whilst Motorcycles are found to contribute <1%.

When considering the average NO_x concentration at receptors with NO_2 concentration greater than 40µg/m^3, road traffic accounts for 71.5µg/m^3 (78.0%) of 91.6µg/m^3. Of this 71.5µg/m^3, Cars account for the most (32.4%) of any of the vehicle types, followed by LGVs (20.5%), HGVs (13.2%), Buses/Coaches (5.2%), and Motorcycles contributing <1%.

Table 4.1 – NO_x Source Apportionment Results

Results	All Vehicles	Car	LGV	HGV	Bus	Motorcycle	Background
Average across all modelled receptors							
NO_x Concentration (µg/m³)	29.4	13.7	8.5	4.3	2.9	0.1	18.1
Percentage	61.9%	28.8%	17.8%	9.0%	6.1%	0.2%	38.1%
Percentage Road Contribution	100.0%	46.6%	28.8%	14.5%	9.9%	0.3%	-
Average Across All Receptors With NO_2 Concentration Greater Than 40µg/m³							
NO_x Concentration (µg/m³)	71.5	32.4	20.5	13.2	5.2	0.2	20.1
Percentage	78.0%	35.4%	22.4%	14.4%	5.6%	0.2%	22.0%
Percentage Road Contribution	100.0%	45.3%	28.7%	18.5%	7.2%	0.2%	-

Figure 4.1 – Pie Charts showing NO_x Source Apportionment Results

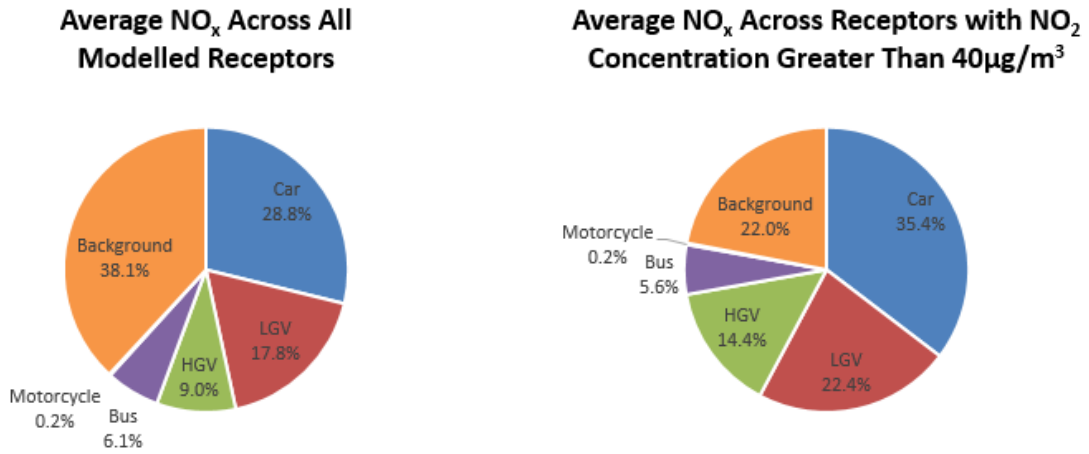


Table 4.2 details the source apportionment results for NO_2 concentrations, whilst Figure 4.2 presents pie charts illustrate the results.

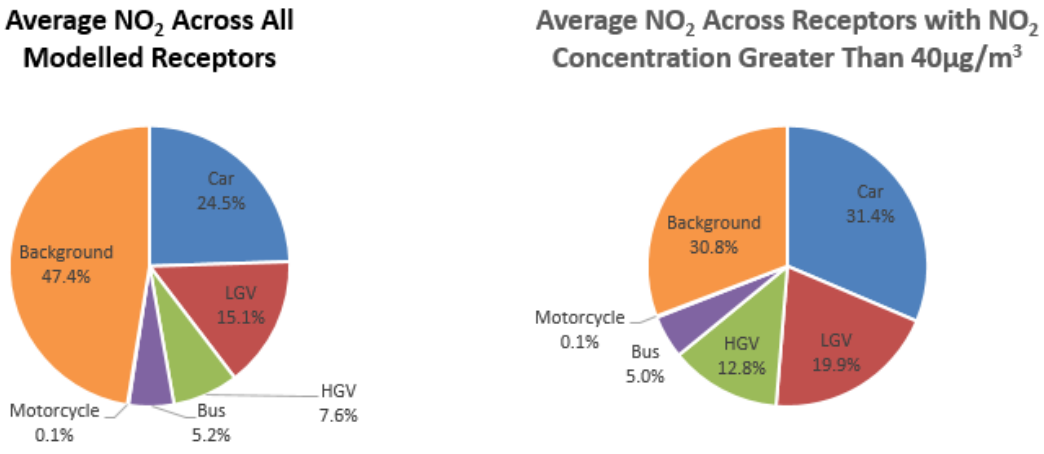
When considering the average NO_2 concentration across all modelled receptors, road traffic accounts for 14.4µg/m³ (52.6%) of total µg/m³. Of this 14.4µg/m³, Cars account for the most (24.5%) of any of the vehicle types, followed by LGVs (15.1%). HGVs and Buses/Coaches account for a similar total road-NO_2, with HGVs at 7.6% (2.1µg/m³) and Buses/Coaches at 5.2% (1.4µg/m³), whilst Motorcycles are found to contribute <1%.

When considering the average NO_2 concentration at receptors with NO_2 concentration greater than 40µg/m³, road traffic accounts for 32.2µg/m³ (69.2%) of 46.5µg/m³. Of this µg/m³, Cars account for the most (31.4%) of any of the vehicle types, followed by LGVs (19.9%), HGVs (12.8%), Buses/Coaches (5.0%), and Motorcycles contributing <1%.

Table 4.2 – NO_2 source Apportionment Results

Results	All Vehicles	Car	LGV	HGV	Bus	Motorcycle	Background
Average across all modelled receptors							
NO_2 Concentration (µg/m³)	14.4	6.7	4.1	2.1	1.4	0.0	13.0
Percentage	52.6%	24.5%	15.1%	7.6%	5.2%	0.1%	47.4%
Percentage Road Contribution	100.0%	46.6%	28.8%	14.4%	9.9%	0.3%	-
Average Across All Receptors With NO_2 Concentration Greater Than 40µg/m³							
NO_2 Concentration (µg/m³)	32.2	14.6	9.3	6.0	2.3	0.1	14.3
Percentage	69.2%	31.4%	19.9%	12.8%	5.0%	0.1%	30.8%
Percentage Road Contribution	100.0%	45.4%	28.8%	18.5%	7.2%	0.2%	-

Figure 4.2 – Pie Charts showing NO_2 Source Apportionment Results



5 Conclusions and Recommendations

Following the completion of the analysis of both monitoring data and modelled concentrations across all of the assessed area a number of recommendations have been made in terms of the AQMAs within Tonbridge and Malling.

5.1 AQMA 1 – M20

AQMA 1 is currently designated for both concentrations of annual mean NO_2 and 24-hour PM_{10}, monitoring is completed within, and close to the AQMA using NO_2 diffusion tubes. There has been no PM_{10} monitoring completed since the designation of the AQMA. There have not been any monitored exceedances of the NO_2 annual mean objective within the past five years but the modelling has predicted concentrations of 40µg/m^3 to have a similar extent to the existing AQMA boundary.

Based upon the analysis of results it is recommended for the AQMA to remain in force with its current boundary in relation to the annual mean NO_2 objective and be revoked in terms of 24-hour PM_{10} objective. The M20 is a Highways England controlled road and therefore the measures to be developed would have to be a collaboration between the Council and Highways England. Works are currently being undertaken to install a Smart Motorway between Junction 3 (West Malling) and Junction 5 (Aylesford), with the aim to improve traffic flow and therefore this may have beneficial impacts for air quality in the area.

In addition to possible collaborative measures, further borough-wide initiatives should be developed that may not have a large direct impact upon AQMA 1 but would bring about improvements across the borough.

5.2 AQMA 2 – Ditton

There have not been any monitored exceedances of the NO_2 annual mean objective within the AQMA over the past five years. In addition the modelling results predicted a maximum annual mean of 29µg/m^3 at a location of relevant exposure and all concentrations in excess of 40µg/m^3 are restricted to within the boundary of the road link.

Due to the ongoing compliance presented within the monitoring completed, and the concentrations predicted through the dispersion modelling, it is recommended that AQMA 2 is revoked.

5.3 AQMA 3 – Tonbridge High Street

There were no monitored exceedances recorded during 2018. This is the first year that no exceedances have occurred in the past five years. A downward trend in annual mean concentrations within the AQMA is visible between 2014 and 2018. In addition, there were no modelled exceedances predicted within the AQMA at relevant locations of exposure. This would suggest that concentrations of NO_2 are improving within the area without the application of specific measures for the AQMA. Due to the High Street environment of commercial usage at ground floor level and residential at first floor level, NO_2 concentration predictions were completed at varying heights to present the change in concentrations in relation to changing heights.

Due to the general downward trend that is apparent within the AQMA it is recommended that a mixture of area specific and borough wide initiatives be implemented regarding Tonbridge High Street. Although the concentrations are not yet at a level whereby the AQMA should be revoked, if they continue to remain below the annual mean objective this should be considered in the future.

5.4 AQMA 4 – Wateringbury

Diffusion tube monitoring sites within AQMA 4 have consistently recorded exceedances of the annual mean objective over the past five years, with concentrations of over 60µg/m^3 recorded at

one location between 2014 and 2017. Monitored concentrations are consistently higher on the eastern approach to the central junction within Wateringbury compared to the western approach. The automatic monitor ZT7 was re-located to the western approach to the central junction in June 2018, with the annualised 2018 annual mean recorded as 23.6µg/m^3.

The completed modelling within Wateringbury broadly agrees with the monitored data, with the highest annual mean concentrations predicted at properties on the northern side of Tonbridge Road.

Due to the monitored and modelled concentrations within the Wateringbury AQMA being the highest within the borough it is recommended that in addition to borough-wide measures being implemented, measures specific to Wateringbury are also developed and implemented. These should specifically target the central junction where concentrations are at their highest.

5.5 AQMA 5 – Aylesford

There are two diffusion tube monitoring locations within the Aylesford AQMA that consistently exceed the annual mean NO_2 objective, these are located close to the junction of the A20, Hall Road and Mills Road. In addition this is the only location where a modelled exceedance of the annual mean objective was predicted. In terms of relevant exposure only a small number of properties fronting the A20 are within areas predicted to be in exceedance of the annual mean objective.

Due to the spatial extent of the monitored and predicted exceedances it is recommended to revise the AQMA boundary from its existing form to that which encompasses the small area of exceedance on the north western corner of the main junction. Concentrations are not yet at a level within the AQMA to revoke therefore a mixture of area specific and borough wide initiatives should be implemented.

5.6 AQMA 6 – Larkfield

There was one diffusion tube monitoring location that exceeded the annual mean objective in 2018. This tube has experienced an exceedance each year since monitoring commenced at the location in 2016. The diffusion tube is sited on a residential façade and therefore is located at a location of relevant exposure. From the modelling completed there were no exceedances of the annual mean NO_2 objective at any of the modelled receptor locations, and the concentration isopleths display that all concentrations in excess of 40µg/m^3 are contained with the modelled road links.

Due to the location of the monitored exceedance it is recommended to revise the AQMA boundary, retracting the eastern boundary of the AQAM to the junction if London Road and New Hythe Lane. This would incorporate the monitoring location that is currently showing an exceedance, and the junction whereby predicted concentrations are at their highest. Due amendment rather than revocation being recommended, a mixture of AQMA specific and borough wide initiatives should be implemented.

5.7 AQMA 7 – Borough Green

There were no monitored exceedances recorded during 2018, which is the first time this has occurred over the past five years. One monitoring location (TN70, 72, 73) has consistently been in exceedance of the annual mean objective, within 2018 this was below, but within 10% of the objective (39.6µg/m^3). Across the majority of the monitoring sites within the AQMA a downward trend in annual mean concentrations within the AQMA is visible between 2014 and 2018. In addition there were no modelled exceedances predicted within the AQMA at relevant locations of exposure, but there was one receptor concentration predicted to be within 10% of the objective at a location close to TN70, 72, 73. The concentration isopleths display that exceedances of the annual mean objective are mostly predicted to be within the boundaries of the road links, with this encroaching to relevant receptors only in the locality of TN70, 72, 73.

Due to the location of the monitoring site, and modelled receptors that are within 10% of the annual mean objective it is recommended to revise the current AQMA boundary. As all other monitoring sites and modelled receptors show compliance with the objective the boundary should remain around the junction of Sevenoaks Road and Western Road to the west of the current AQMA. Due amendment rather than revocation being recommended, a mixture of AQMA specific and borough wide initiatives should be implemented.

TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision

1 EXTENSION OF THE EXISTING ALLINGTON INTEGRATED WASTE MANAGEMENT FACILITY STATUTORY PRE-APPLICATION CONSULTATION UNTIL 16 OCTOBER 2020 – NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECT (NSIP) – DEVELOPMENT CONSENT ORDER (DCO)

Summary

This report advises Members on the statutory pre-application public consultation for a Development Consent Order (DCO) to extend the Integrated Waste Management Incinerator at Allington which is a Nationally Significant Infrastructure Project (NSIP). The consultation ends on the 16th October. The report covers a basic overview of the NSIP process, likely time frames, the Council's participation, key points for the Council to consider and a recommended response to the consultation.

The consultation and its relevant documents can be accessed via the following link - https://app.box.com/v/allingtoniwmf

1.1 Introduction

1.1.1 FCC Environment (UK) Ltd are proposing to extend their current Integrated Waste Management facility at Laverstoke Road, Allington with a fourth waste treatment line. This is unlike a normal application for planning permission because the scheme qualifies as a Nationally Significant Infrastructure Project (NSIP) and will be determined under the separate (NSIP) procedure set out in the 2008 Planning Act by the Planning Inspectorate. Such a development proposal is determined as a NSIP due to the generation capacity of the extended generating station. The proposed extension, in combination with the existing station, would exceed the NSIP threshold of 50 Mega Watts.

1.1.2 This pre-application consultation is one of the initial and important requirements of the NSIP process prior to submitting an application for a development consent Order. Such applications are determined by the Planning Inspectorate (PINS) on behalf of the Secretary of State who will make the final decision. Therefore Tonbridge and Malling Borough Council does not determine the proposal but is a consultee.

1.1.3 It is important to note that the information provided as part of this pre application statutory consultation is preliminary information and is not the complete and finalised package. As part of the consultation feedback, details may change and/or extra information may be needed. The results of the consultation are presented in a consultation statement.

1.1.4 The Planning Act does not specify a set level of information/plans to be provided by the applicant at the pre-application stage. NSIP guidance recognises there is a balance between consulting early but also having project proposals firm enough to enable consultees to comment and recognise and understand the impacts. This scheme will require an Environmental Impact Assessment (EIA/ES). This is not required to be submitted at the pre-application stage; instead applicants are advised to submit a preliminary environmental information report (PEIR) to enable consultees to develop an informed view of the project.

1.2 What is an NSIP

1.2.1 The Planning Act 2008 produced a new decision making process for major infrastructure projects in the fields of energy, transport, water, waste water and waste. These projects are large scale developments both onshore and offshore such as new powers stations, harbours, roads and electricity transmission lines. The aim is to streamline the decision making process for such projects making it fairer and faster for communities and developers alike. The Planning Act sets out the thresholds above which certain types of development are considered nationally significant and requires an application for development consent under the NSIP procedure. In this case for electricity generation, the trigger point is 50 Mega Watts.

1.2.2 The NSIP process works on a front loaded method and therefore pre-application consultation of the project is a key requirement prior to the submission of the application to the Planning Inspectorate. The development consent order (DCO), if eventually granted by the Secretary of State, is meant to be a complete process whereby it not only provides planning consent for the project but incorporates other consents including authorisation for the compulsory acquisition of any necessary land.

1.2.3 The application is considered within its national context and need and determined in accordance with the National Policy Statements which for this development would be EN1 – Overarching National Policy Statement for Energy, EN3 – Overarching National Policy Statement for Renewal Energy Infrastructure and EN5 – Overarching National Policy Statement for Electricity Networks Infrastructure. The National Planning Policy Framework and Planning Policy Guidance are also material considerations and to a lesser degree the Local Development Plan.

1.2.4 The application is submitted to the Planning Inspector who manages the process and appoints an examining authority to run the public examination. The Inspector

concludes by making a recommendation to the Secretary of State who makes the final decision.

1.3 What are the NSIP stages

1.3.1 The key stages of the NSIP process are as follows:

- Pre application consultation (unlimited time period) – ends 16th October 2020.
- Application Acceptance (28 days).
- Pre-examination (3 months).
- Examination (6 months).
- Recommendation and decision (6 months).

1.4 Application site and surroundings

1.4.1 The development site is located at the existing waste management centre at Laverstoke Road in the parish of Aylesford. The vast majority of the site is within the Council's administrative boundary in the ward of Aylesford South but a small portion of land (in the south-western corner) lies in the administrative boundary of Maidstone Borough Council (MBC).

1.4.2 The existing facility and main access is situated within the 20/20 business park with the actual proposed development area immediately to the west of the site within a disused quarry which is surrounded by earth bunds and tree screening. This area is subject to the provision of a Section 106 Agreement, which includes the retention of the land for nature conservation purposes (non-designated).

1.4.3 Directly to the north is the M20 Motorway. Laverstoke Road is located to the east, beyond which is the 20/20 Business Park which includes a range of commercial uses (including office space, industrial units and distribution units). To the south is St Laurence Avenue beyond which is a mainline railway and past that is a residential development known as 'The Orchards'. To the south-west and west is the A20 London Road/Coldharbour Lane as well as the Poppyfields public house.

1.5 The Proposal

1.5.1 The application seeks consent for a fourth waste treatment line to the existing station. The proposed extension would be located immediately to the west of the existing station and would be capable of processing up to an additional 350,000 tonnes of non-hazardous residual waste per annum in a single process line and generating approximately 32MW of electricity. In combination with the existing station, the extended generating station would be capable of processing up to 910,000tpa of non-hazardous residual waste, generating circa 77MW of electricity.

1.5.2 Whilst comprising an extension to the existing station, it is proposed that the proposed extension would utilise a different thermal treatment technology to the processing lines contained within the existing station. It would include a moving grate combustion system, rather than the fluidized bed system. However the basic operational activities carried out at the proposed extension would not differ significantly from the existing processing lines and would follow the same basic process that already operates.

1.5.3 The proposed extension would cover an area of approximately 6.9 ha. It would be a single main building, divided into a series of distinct but interconnected smaller buildings housing the various process areas. The main building would be approximately 145.6m in length, with a width approximately 114.2m at the widest point. The existing land form would be excavated to create a level platform with the highest part of the building 37 metres above the 16 metres AOD (above ordinance datum) level. A shared stack is proposed at a height of 90 metres, 10m higher than current.

1.5.4 In design terms, the development would have a utilitarian appearance with a predominantly flat roof form with an external finish of metal cladding. The remaining land within the site would be landscaped with enhanced habitats including, woodland screening around the perimeters, hedgerows, scrub and grassland areas as well as a pond feature. The western part of the site would be publicly accessible, via St Laurence Avenue with designated footpaths. A number of plans and elevations are appended at **Annexes 1 – 8** for Members' information.

1.5.5 Access would remain as is currently the case, from Laverstoke Road which connects to St Laurence Avenue which in turn connects to the A20 via a roundabout. The existing internal access arrangement would be improved to allow for the free flow of commercial and private vehicles internally within the Site. The improvements would enable additional queuing capacity off the public highway.

1.5.6 The proposed extension would operate on the same hours as the existing station, which is 24-hour 7 day a week, 365 days per year basis.

1.5.7 Owing to the loss of the existing land to development at the Allington site, the applicant has sought to offset the loss of biodiversity arising from the development by means of an additional off-site compensatory habitat enhancement. This is proposed to take place at former Stangate landfill Quarry (east/west), Crowhurst Lane near Borough Green where the applicant owns and controls parcels of land. It is proposed that habitat enhancement work at Stangate quarry and the Allington site together, will achieve a net biodiversity benefit of 10% in line with Government guidance.

1.6 Household Waste Recycling Centre

1.6.1 You may be aware of an application to build a new public Household Waste Recycling Centre at the same site, adjacent to the existing station. This is by the

same applicant, however does not form part of this DCO application, although it has been included in the Environmental Impact Assessment (EIA), considering the cumulative impacts.

1.6.2 The application has been approved by KCC (the determining waste authority) and further details can be found on the KCC website under KCC/TM/0284/2019.

1.7 Appraisal

1.7.1 It is not the intention here to appraise all the material planning considerations of the scheme, however attention is drawn to the following key areas of concern which Members should be mindful of. The full draft consultation response is attached to this report for Members' consideration **[Annex 9]**.

1.7.2 *The Consultation* - officers, in consultation with Cabinet and ward Members, have already commented on the Statement of Community Consultation (SoCC), which sets out how the applicant will consult with the local community and interested parties, and respond to questions and suggestions. In this regard, the methodology was considered acceptable and took into account the constraints presented by COVID 19 and the need to ensure social distancing.

1.7.3 *Waste Management* – in terms of the waste management this is not a local authority matter where Kent County Council are the Waste Authority and are best placed to advise on this matter. However Kent's early Partial Review of the Minerals and Waste Local Plan 2013-30 has been found sound and is due to be adopted by KCC shortly. This has an overall objective of maintaining net self-sufficiency for waste in the county for the duration of the Plan period. Therefore the provision of such additional capacity within the borough may be considered contrary to those waste policies. Officers expect that these issues will be raised by KCC in their response to the consultation exercise.

1.7.4 *Impact upon the TMBC Local Development Framework and emerging Local Plan* - the development site is not the subject of any site specific policy within the LDF or emerging Local Plan. On this basis, the development is not considered to conflict with the current or emerging development strategy in the borough.

1.7.5 *Socio-economic* – the Council's Economic Regeneration Manager welcomes the proposal in terms of the positive impact on employment generation within the borough. However he has recommended that ideally, there should be a strong commitment to sourcing local trade and suppliers as well as supporting training opportunities for the young.

1.7.6 *Design and visual Impact* – the consultation documents make a commitment to good design. In this regard, a utilitarian modern design is proposed that seeks to visually interrelate with the existing building and utilise existing facilities (where possible), in particular a shared stack (instead of two single stacks). Inevitably such a large development will present some visual intrusion into the area, however in this location, adjacent to an existing industrial building and commercial

estate this is not considered to be significant enough in planning terms to merit an objection on this basis.

1.7.7 *Ecology* - the current status of the site is a non-designated nature conservation area where there has historically been a commitment to maintain and manage this land. However the land has limited ecological value. A large proportion of this would be lost to the development therefore the applicant seeks to off-set the loss of biodiversity by means of an off-site compensatory habitat enhancement scheme at Stangate quarry within the west of the borough where a biodiversity net gain of 10% is proposed. The ecologist at Kent County Council is generally supportive of the scheme.

1.7.8 *Construction and residential amenities* – the site is located close to residential properties where residents may be adversely affected by noise and disturbance from pilling and excessive working hours. The Council's Environmental Health Officers have therefore recommended a different type of pilling be used as well as a reduction in site construction times.

1.7.9 *Air Quality* – the development proposes a taller shared stack the height of which would be ten meters higher than the existing stack to mitigate any adverse impacts upon both the human and natural environment. Taking into consideration the prevailing wind, The Council's Environmental Health Officers are generally happy that there would not be any significant reduction in air quality in the borough. The Officers have recommended consideration be given to ensuring future developments in the area are factored into the air quality modelling and that traffic routes, (where possible), avoid the Air Quality Management Areas in the borough.

1.7.1 *Highways* – Kent County Council are the Highways Authority and are best placed to advise on highways matters. However, owing to the COVID – 19 travel restrictions, the consultation does not include a junction capacity survey of junction 5 of the M20. This is a key piece of evidence which is missing and therefore it is recommended that this is carried out and submitted as part of the final submission to the Inspector. In this regard, the applicant is advised to refer to the Council's Local Plan transport evidence which may be helpful. The applicants Transport Assessment has also failed to properly take into account cumulative developments and committed growth, in particular the approved development reference 17/01595/OAEA, as well as other recently approved developments which should be highlighted to the applicant.

1.8 Legal Implications

1.8.1 The statutory legislation that governs NSIP is the Planning Act 2008 and this consultation is carried out under section 42 and/or Regulation 3 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

1.8.2 The Council is not the decision maker and under Section 42, the Council is effectively only a consultee giving its views on the development but as one of the 'host' local authorities, it has some wider duties and responsibilities under the process from the pre-application to the post decision stages. Participation is not obligatory but is strongly advised by the Inspectorate.

1.9 Financial and Value for Money Considerations

1.9.1 There are no financial or value for money considerations as part of this consultation.

1.10 Risk Assessment

1.10.1 As stated above, the Council is not the decision maker in this instance, but is a consultee. If the consultation is not considered and a representation is not made at this stage, there is the risk that the concerns and priorities of this Council and the potential impacts on local residents will not be relayed to the applicant.

1.11 Equality Impact Assessment

1.11.1 The decisions recommended in this report have a remote or low relevance to the substance of the Equality Act.

1.11.2 The most affected people will be those living the closest to the development site, however the Council has recommended some mitigation measures to reduce disturbance to a minimum. The Council has also recommended some measures to ensure equality in the recruitment of staff.

1.12 Policy Considerations

1.12.1 Climate Change Strategy

1.13 Recommendations

1.13.1 That the content of this report **BE NOTED**; and

1.13.2 The Director of Planning, Housing & Environmental Health, in consultation with the Cabinet Member for Street Scene and Environment regarding any changes agreed at this meeting, **ISSUE** the attached response as the Council's formal position on the public consultation that finishes on the 16th October.

Background papers: contact: Julian Ling

Nil

Eleanor Hoyle
Director of Planning, Housing and Environmental Health

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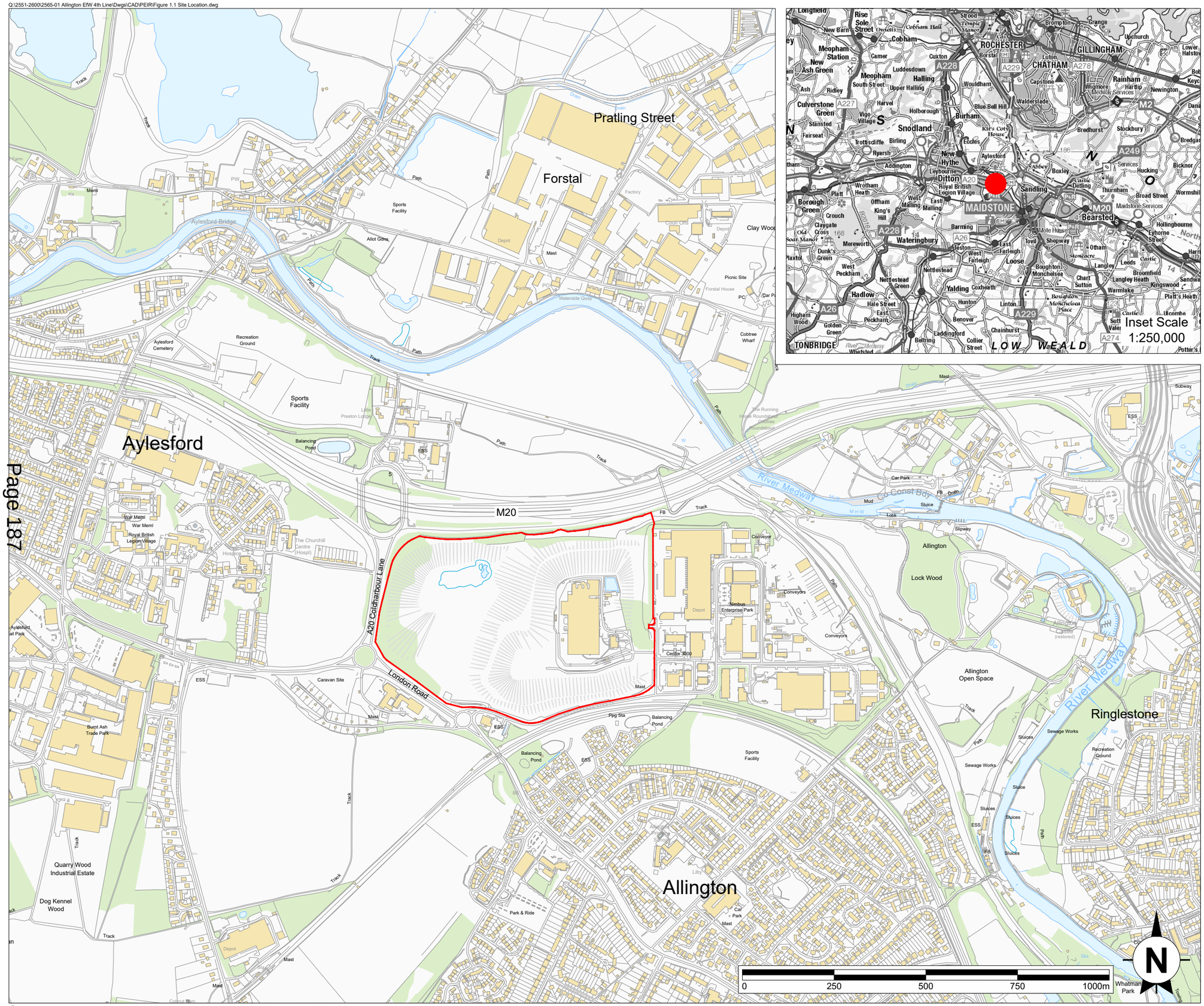
Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 1.1 Site Location.dwg



Site Location

Site Boundary

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 1.1

Site Location

Scale	Date
1:10,000@A3	July 2020

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Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 1.5 Indicative Extended Generating Station Layout without Proposed HWRC.dwg

Site Boundary

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 1.5

Indicative Extended Generating Station Layout without the Proposed HWRC

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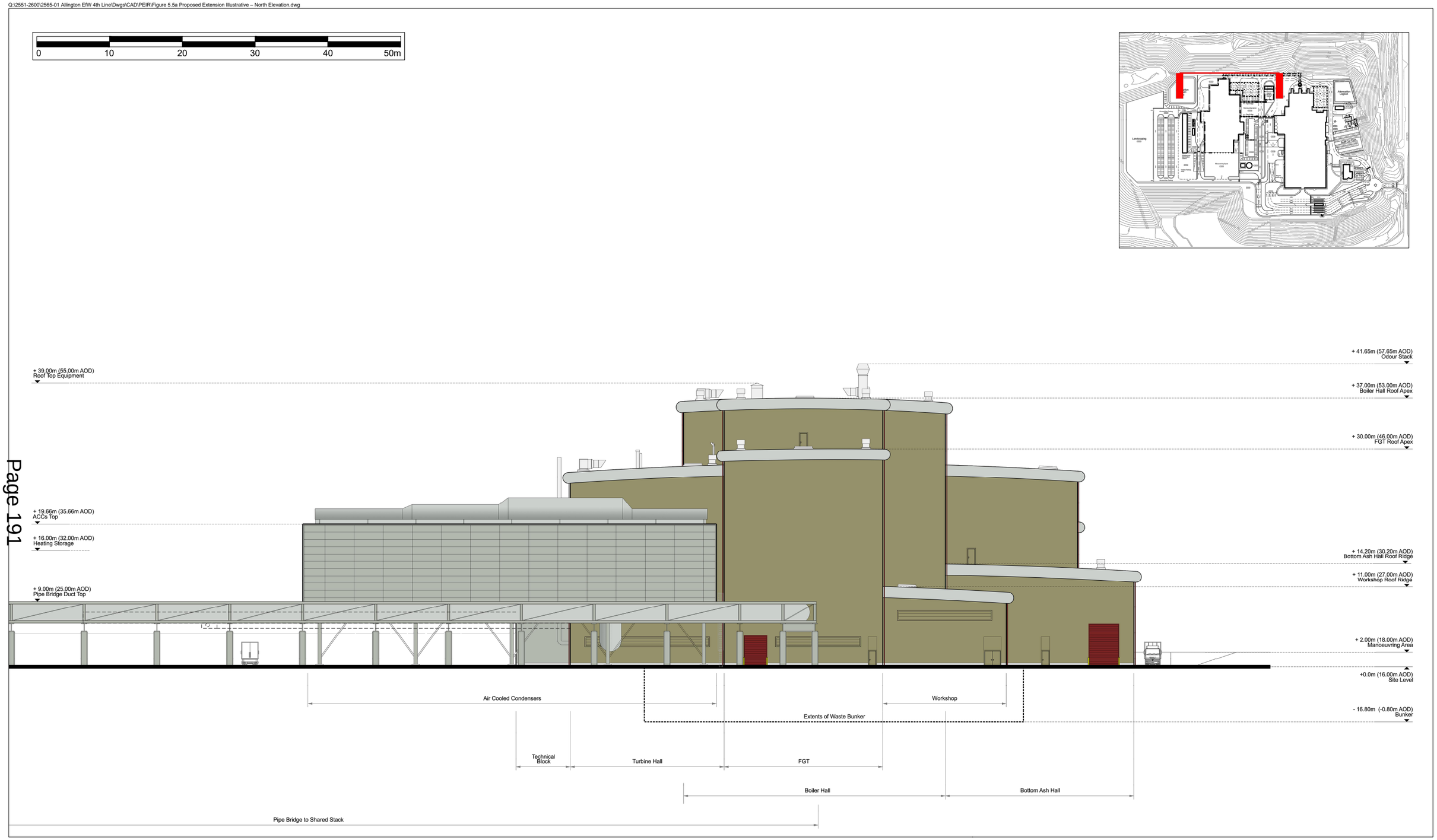
Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 5.5a Proposed Extension Illustrative – North Elevation.dwg



axis

FCC Environment

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 5.5a

Proposed Extension Illustrative North Elevation

Scale	Date
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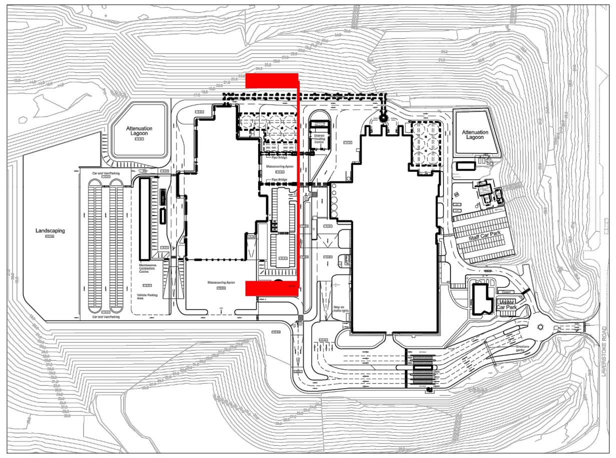
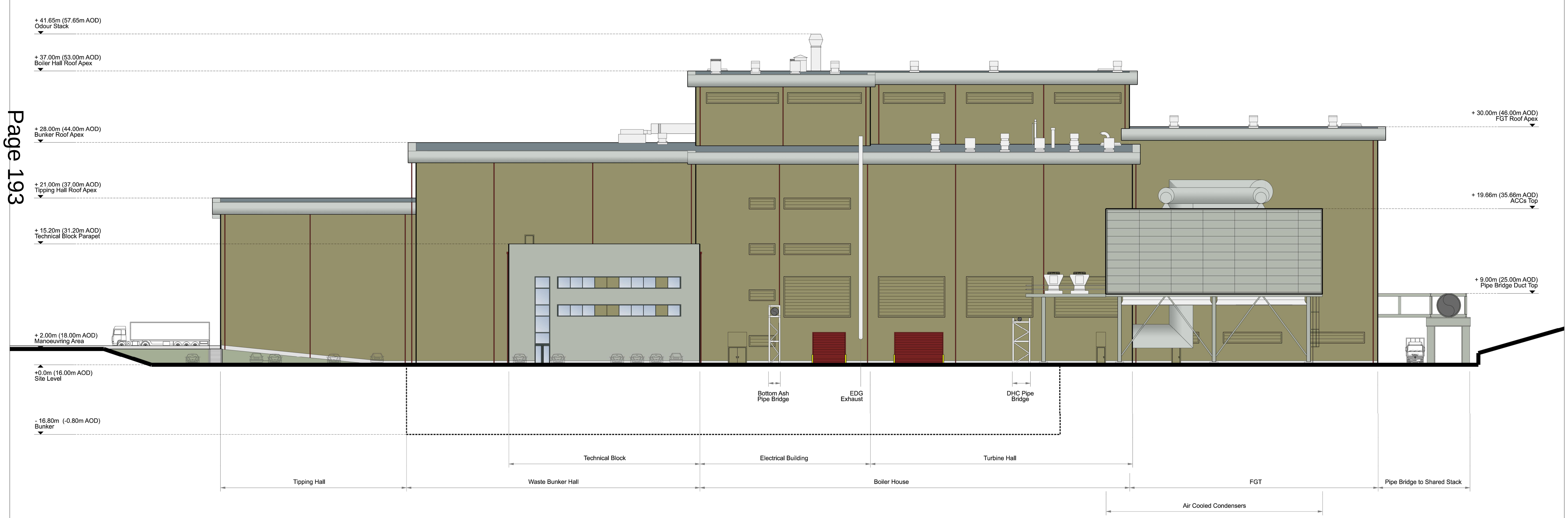
Annex 4

Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 5.5b Proposed Extension Illustrative – East Elevation.dwg





axis

FCC Environment

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 5.5b

Proposed Extension Illustrative East Elevation

Scale
1:500@A3

Date
July 2020

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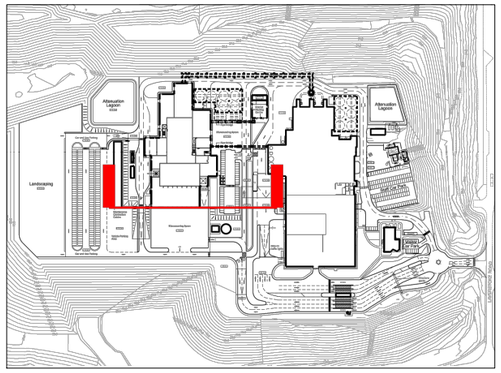
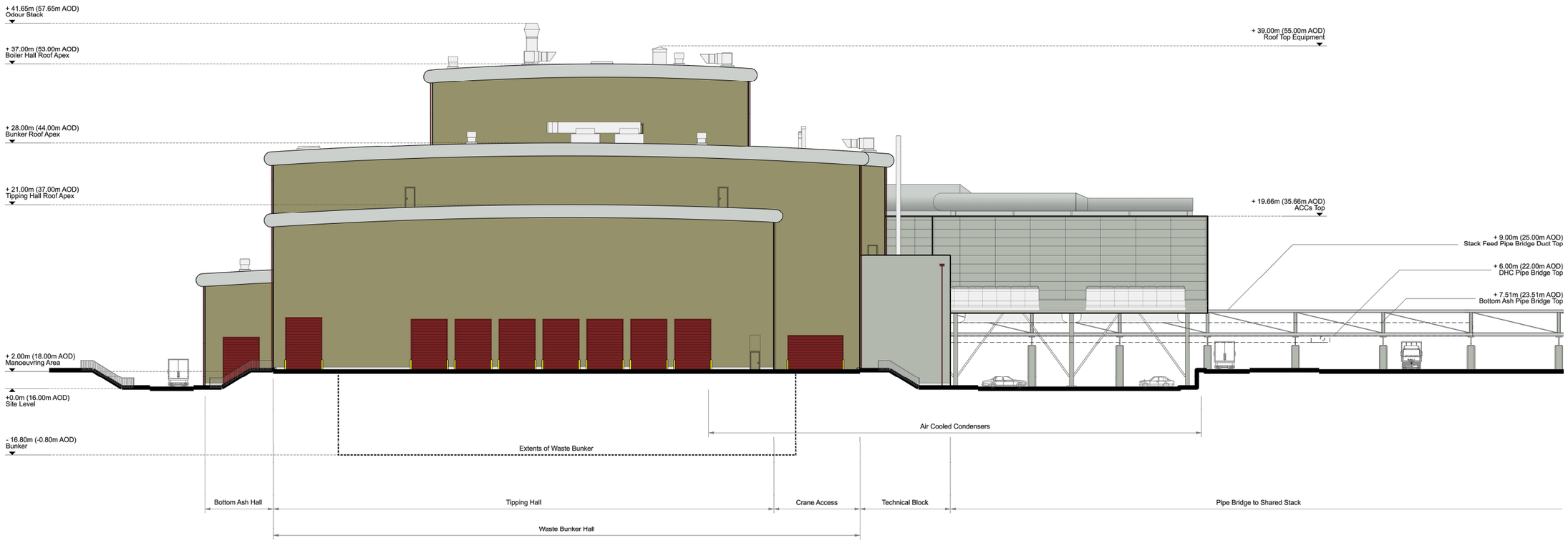
Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 5.5c Proposed Extension Illustrative – South Elevation.dwg





axis

FCC Environment

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent Preliminary Environmental Impact Report (PEIR)	Figure 5.5c Proposed Extension Illustrative South Elevation	
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Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 5.5d Proposed Extension Illustrative – West Elevation.dwg

axis

FCC Environment

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 5.5d

Proposed Extension Illustrative West Elevation

Scale	Date
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Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 5.16 3D Image.dwg

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 5.16

3D Image

Scale	Date
NA	July 2020

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Q:\2551-2600\2565-01 Allington EfW 4th Line\Dwgs\CAD\PEIR\Figure 9.6a Illustrative Landscape Masterplan_revA.dwg

FCC Environment

axis

Key:

- FCC Land Ownership Boundary

Existing Features

- Woodland (retained)
- Scrub(retained)
- Existing Grassland
- Waterbody (retained)

Proposed Features

- New Native Woodland
- New Native Scrub
- New Species-rich Grassland
- New Open Mosaic Habitat
- New Hedge
- New Waterbody
- New Swale
- Permissive Footpaths
- Viewing Area
- Suggested Secure Fenceline

Application for Development Consent Order (DCO) for an Extended Generating Station with a generating capacity exceeding 50MW at Allington, Kent

Preliminary Environmental Impact Report (PEIR)

Figure 9.6a

Illustrative Landscape Masterplan (without the Proposed HWRC)

Scale	Date
As shown	July 2020

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www.tmbc.gov.uk/localplan

localplan@tmbc.gov.uk

Gillian Sinclair
FCC Environment
Ground Floor West
900 Pavilion Drive
Northampton Business Park
Northampton
NN4 7RG

Contact Julian Ling
Email Julian.ling@tmbc.gov.uk
Your ref.
Our ref.
Date 09.09.2020

Dear Gillian

Extension of the existing Allington Integrated Waste Management Facility statutory pre-application consultation - Section 42 of the Planning Act 2008.

Thank you for consulting Tonbridge and Malling Borough Council (TMBC) regarding this development. TMBC welcome this opportunity to comment on the proposal and assist your company with this project.

TMBC recognise the complex nature of the project and that this information represents the preliminary evidence and proposals of the development. The Council therefore does not wish to comment fully on any initial conclusions or statements included in this consultation and these comments are given without prejudice to any future decision the Council may take regarding this development.

Tonbridge and Malling Borough Council LDF and emerging Local Plan

Within the borough of Tonbridge and Malling the adopted Development Plan is the Local Development Framework which comprises a suite of Development Plan documents including the Core Strategy (adopted in 2007), Development Land Allocations DPD (adopted 2008), the Tonbridge Central Area Action Plan (adopted 2008), the Managing Development and the Environment DPD (adopted 2010) and a compendium of 69 development management policies (saved in 2010). The development site is not subject to any site specific policy however it is located partly within the Strategic Gap (CP5), the Urban Fringe (OS7) and the countryside (CP14) and partly within the '20/20 Estate which is a safeguarded employment site (E1h) within the wider Urban Area (CP11).

The Council's new emerging Local Plan is now at an advanced stage where it was submitted to the Planning Inspectorate for examination on Wednesday 23rd January 2019 for public examination and stage one hearing sessions are scheduled to take place in October and November 2020. Similar to the LDF, the development site is not the subject of any site specific policy within the Local Plan and is located partly within a rural area and partly with the existing urban area in terms of policy LP5. Policy LP24 recognises the requirement for development to comply with the Kent Minerals and Waste Local Plan and policy LP34 safeguards the 20/20 Estate Aylesford for employment uses.

Based on the information so far, TMBC does not consider the proposal to conflict with the development strategy in the Borough Council's current LDF or emerging Local Plan but wish to make the following comments on the development proposal.

The Consultation

In relation to this consultation, TMBC continue to support the special measures put in place that take account of the constraints presented by COVID – 19, in particular the need to ensure social distancing and the extended time period given for responses to be made.

Socio-economic

Overall, TMBC welcomes the proposal in terms of the positive impact on employment generation within the borough. The Council is committed to improving economic prosperity and job creation in the borough as set out in the TMBC Economic Regeneration Strategy 2019 – 2023. The Council acknowledge the additional jobs both during construction and once operational, but would like to see a specific commitment to sourcing local trade and suppliers beyond the theoretical application of the Homes and Communities Agency (Homes England) multipliers.

When considering the labour market and current unemployment levels owing to the COVID-19 crisis (and potential vulnerabilities should a No Deal Brexit happen), it is likely that the borough will continue to experience higher unemployment levels than the historic average. Currently, unemployment levels in the borough are at 4.2% (June 2020), with unemployment in the adjoining borough of Maidstone at 5.3%. It is also worth recognising that youth unemployment (18-24 year olds) is currently at 7.8% and there are a number of pockets of higher unemployment in the borough that are located quite close to the proposal site such as Snodland East and Hamhill (6%), Burham and Wouldham (5.6%) and Aylesford South (5.3%). With this in mind, The Council considers there is a realistic opportunity for FCC Environment, and its contractors during the construction phase to engage with the Borough Council/Kent Apprenticeships/Kent Supported Employment and the Maidstone Job Centre, to explore the role that (higher level) apprenticeships, internships or graduate schemes might play in the recruitment drive. Whilst reference is made to training and skills in the economic impact assessment, the Council would like to see a stronger commitment to supporting such training opportunities.

Design

Regarding design, the Overarching National Policy Statement for Energy (EN1) states that "applying good design to energy projects should produce sustainable infrastructure, sensitive to place, efficient in the use of natural resources and energy used in their construction and

operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area".

The Council acknowledges that the design is still to be finalised and is pleased to see that the documents makes a commitment to good design. So far, the Council supports that a utilitarian modern design is proposed that seeks to visually interrelate with the existing building and utilise existing facilities (where possible), in particular a shared stack.

To reduce the visual impact upon the skyline, the design process should explore other options to further reduce the height of the building, such as lowering the existing ground levels and sinking the building further below ground and/or different plant configurations.

As the final design is progressed, the Council would recommend the use of innovative and low-carbon solutions as part of the design and build, for example, low-carbon construction methods and materials with less embedded carbon.

Biodiversity

The Council recognises the current status of the site as a non-designated nature conservation area which has limited ecological value but also that there has historically been a commitment to maintain and manage this land. A large proportion of this would be lost to the development but TMBC recognise that a strategy is proposed that seeks to off-set the loss of biodiversity by means of off-site compensatory habitat enhancement at Stangate quarry within the west of the borough. The Council supports the biodiversity net gain of 10% on baseline values that this strategy could achieve.

The proposals includes ecological restoration of the site on areas of land not needed for the permanent development. The Overarching National Policy Statement for Energy (EN1) states "Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design" (5.3.15). On this basis, it is considered that there could be further opportunities for on-site enhancement by increasing habitat connectivity, contributing to wildlife corridors, improving the water environment and landscaping with pollinators. Consideration should also be given to making space for species within the design and build, for example the integration of concealed nest boxes as part of the exterior of the buildings/structures.

Construction and residential amenities

The site is situated within close proximity to residential areas of Bunyard Way and Poppy fields where people's residential amenities should be safeguarded from noise, vibration, dust and fumes.

Within several documents the construction technique of percussive piling has been cited which The Council has significant concerns regarding how disruptive and intrusive this can be from noise and vibration. Instead it is strongly recommended that CFA pilling be used as this is a lot quieter and less disruptive. The documents also do not appear to indicate how many piles will be required to be sunk, and over what timeframe. Monitoring will be required for such activities, especially if percussive is used and the documents do not appear to give much detail into how this will be monitored.

With regard to working times, The Council acknowledges the proposed working times set out in the Construction Environmental Management Plan but consider these to be excessive, particularly on Saturday. To ensure impact upon amenities is reduced to a minimum, the Council would recommend the working and deliver times are amended to be in accordance with the Council's adopted construction site core hours of 07.30 – 18.30hrs Monday – Friday and 08.00 – 13.00hrs Saturday and not at all on Sundays and bank holidays inclusive of deliveries. In the event that construction is to take place outside of these hours, then it is strongly recommended that FCC apply for a Section 61 Prior Consent notice from Tonbridge and Malling Borough Council.

Air Quality

Concerning cumulative impacts, it is not clear whether the air quality assessments have taken into account the recently approved development at South Aylesford – 17/01595/OAEA. It is strongly recommended that this is considered, whereby this site will become one of TMBC's closest receptors beyond the residential accommodation at Poppy fields and the first occupation may well occur before or at the same time as the new plant becoming operational.

It is also requested by The Council, that when planning transport routes, roads from the south and south west are considered in order to avoid existing AQMA's (particularly in Wateringbury). Site traffic coming from this direction should be encouraged to use the A228/M20 rather than the A26/Hermitage Lane.

Highways

For highways matters, TMBC are guided by Kent County Council (KCC), who are 'The Highways Authority' for the borough and TMBC are aware that they will respond separately on this consultation.

Notwithstanding comments made by KCC, of particular concern to The Council are the impacts upon junction 5 of the M20, as well as the A20 corridor. The Council acknowledges that owing to the COVID–19 travel restrictions, it has not been possible to carry out a traffic assessment of junction 5. To ensure an accurate assessment of these key junctions, The Council strongly recommends that this is carried out and included in the final Transport Assessment submitted to the Planning Inspectorate.

With this in mind, the Council wishes to highlight the forecast junction capacity transport assessment on the A20 corridor including Junction 5 of the M20, commissioned as part of its Local Plan evidence base that may be of help. This can be accessed using the following link A20 VISUM Study (March 2019). As shown in the results, Junction 5 is modelled in both the future (2031) Do Minimum scenario (the future baseline excluding the strategy in the submitted Local Plan) and Do Something scenarios (the Local Plan strategy as submitted). The modelling shows the junction to operate within theoretical capacity, however with the development strategy factored in (DS), the position becomes more marginal.

The Council is pleased to see that traffic flows used in the Transport Assessment (TA) take account of committed growth, in particular the development land south of London Road and East of Hermitage Lane Aylesford (Application ref: 17/01595/OAEA) – now granted outline planning permission. However according to your TA, it has only taken account of 175 dwellings associated with the opening of the relief road. The Council strongly recommends

that to ensure the development takes into account the full impact of this major site, the whole quantum of development (840 dwellings, primary school and surgery) is modelled into the Transport Assessment. Concerning other committed development, the Council also wishes to highlight the recent approved applications, as set out in Appendix A below, that may have a local impact from trip generation that should be considered in combination with this application.

Lastly, to contribute to reducing carbon emissions and improve air quality, electric vehicle charging points should be proposed within the parking provision on site.

Conclusion

Overall the development is considered to present some positive aspects. Moving forward TMBC consider that further assessments are still required as well as some additional/updated details. TMBC hope these comments are of assistance to you and continue to support collaborative working with your company and the Planning Inspectorate as the project progresses through the examination process.

Yours sincerely

Ian Bailey
Planning Policy Manager
Tel: 01732 876061

APPENDIX A.

18/03008/OA - East of Clare Park Estate New Road East Malling West Malling. Development of the site to provide up to 110 dwellings (Use Class C3) and the site access arrangement. All other matters reserved for future consideration. Approved.

19/02841/FL - 675 London Road Ditton Aylesford. Demolition of existing buildings and erection of Class A1 foodstore with associated parking, landscaping and access works. Approved.

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TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Information

1 ENVIRONMENTAL HEALTH PERFORMANCE 2019/20

Summary
This report summarises the operational activities of the Council in relation to its statutory Environmental Health functions undertaken by the Environmental Protection Team and Food and Safety Team for 2019/2020.

1.1.1 The Environmental Health function, made up of the Environmental Protection and the Food and Safety Teams is primarily concerned with protecting the public from the harm they may encounter in the environment, from food consumption, unsafe workplaces and with improving health. Officers act as advisers, educators and regulators and carry out site visits and give assistance to individual householders and businesses and to managers and workers. In certain circumstances, they take enforcement action to ensure compliance with legislation designed to protect the health of the public.

1.2 Food and Safety Team

1.2.1. A significant part of the work of the team is the food premises inspection programme, which includes full or partial inspections of high and medium risk food businesses and questionnaires to low-risk business. A total of 509 full or partial inspections have taken place in 2019/20. In addition 95 re-visits to food premises were undertaken to ensure legal contraventions had been remedied. All but 16 programmed interventions and 17 new business registrations were completed that were due in 2019/20. These were not completed mainly due seasonal closures, new businesses registering but not yet ready to operate and the beginning of the COVID lockdown restrictions. Specific details of food safety interventions are shown in **[Annex 1].**

1.2.2 The Council's results show that at the end of 2019/20, 97.8 per cent of our food businesses are broadly compliant and have achieved a rating of three or better in the National Food Hygiene Ratings Scheme. Full details are presented in **[Annex 2].**

1.2.3 Food sampling is important to help ensure the safety of food. The Food and Safety team participated in national sampling surveys which included vacuum packed ready to eat foods and swabs of vacuum packers from retail and catering establishments, raw milk cheeses (UK and non UK in origin) and flour from retail, catering and manufacturing premises. In addition, samples were taken as a result of food poisoning allegations or complaints of poor hygiene and routine surveillance of a variety of food businesses. We also continue to sample from Approved establishments (normally manufacturers). In 2019/20, officers took 153 samples and sent them for microbiological examination. Twelve unsatisfactory results were investigated and advice given to businesses to resolve problems. Re-samples were taken where required. Further details can be found in **[Annex 3]**.

1.2.4 During 2019/20, a total of 264 reports of food poisoning were made and investigated when food businesses were implicated. Campylobacter cases continue to be the largest number of reported cases of food poisoning in the borough, with 203 cases. The incidence of salmonella was just 22 in comparison. The team provides advice to people suffering from food poisoning or food related disease and, where necessary, outbreak investigations and sampling are undertaken with businesses that may be implicated.

1.2.5 Officers continue to deliver food safety and hygiene training as part of the West Kent Local Authority Training Partnership, operated in conjunction with other West Kent local authorities. In 2019/20, officers delivered one Level 2 food hygiene course at Tonbridge and Malling as part of the partnership arrangement. During 2019, one of the Food & Safety officers developed an allergen awareness course for food handlers resulting in 3 courses and 58 food handlers receiving training.

1.2.6 Seven targeted health and safety inspections were undertaken to warehouses as part of the Kent and Medway Warehouse project. The project looked predominantly at the safety arrangements for working at height and workplace transport. Seven visits were made as a result of formal accident reports received.

1.2.7 The Food and Safety team received 169 service requests in 2019/20. These included complaints about food, food premises and the hygiene of food handlers, as well as workplace health and safety complaints. All these complaints were fully investigated and relevant action taken.

1.2.8 **Formal Enforcement Action –** Although our aim is to provide advice and guidance to business operators in the majority of cases, in order to protect public health, it is sometimes necessary to take formal action against businesses. In 2019/20, one business agreed to close voluntarily due to a rodent infestation and four food hygiene improvement notices were served to secure compliance for offences such as lack of hot water and poor repair. One health and safety prohibition notice was served for unsafe working at height and seven improvement notices were also served on other businesses for failing to maintain electrical systems, work place transport and risk assessment.

1.3 Environmental Protection Team

1.3.1 During the twelve months from 1 April 2019 to 31 March 2020, 471 requests for service were received. Of that total, 68 concerned the odour from Drytec in Tonbridge. Other issues that generated significant requests for service included noise both from domestic and licensed premises, barking dogs, bonfires, and various types of accumulations on private land. Specific details of the types of requests received are shown in **[Annex 4].** Given the delay to the usual timing of this report, also shown in Annex 4 is a brief comparison of April-August 2020 compared to April-August 2019 and the increase in the number of complaints received during lockdown to which the team have responded.

1.3.2 On receipt of a complaint, letters are sent to the complainant (with diary sheets enclosed) and to the person alleged to be causing the nuisance, advising them that a complaint had been received and requesting them that if the allegation is correct to resolve the situation. Often no further communication is received by officers from either party, indicating an informal resolution to the issue with no further involvement from officers.

1.3.3 On some occasions is necessary for the team to instigate formal action to protect public health/prevent Statutory Nuisance. This is usually because the enforcement options, as set out in the Enforcement Policy, have been exhausted. A summary of Notices served in this period is provided in **[Annex 5]**.

1.3.4 The Environmental Protection Team (EPT) are formally consulted by their colleagues in the Planning Service on applications received and on which the EPT make recommendations for the inclusion of conditions or “informatives” if planning permission is granted. These recommendations are intended to pre-empt and address areas of environmental concern prior to development starting. They also ensure that appropriate mitigation measures and/or remediation measures are addressed and implemented within the proposal to protect the quality of life for the future occupants of the development and neighbouring properties. During the period the team responded to 378 planning and discharge of condition applications.

1.3.5 Under the provisions of the Licensing Act 2003, Environmental Health is a statutory consultee in respect of applications for Premises Licences and Temporary Events Notices (TENS). During the year the team responded to 31 Premises Licence applications, and 361 TENS applications.

1.3.6 Certain specified processes are required to obtain a ‘permit to operate’, under the provisions of the Environmental Permitting Regulations, which control emissions from site. Responsibility for enforcement of the regime is divided between the Environment Agency and Local Authorities. There are 47 permitted processes within the Borough for which we are responsible, covering processes which include, petrol stations, dry cleaners and car resprayers. During the year the EPT

conducted 9 proactive inspections, and the standard of compliance with the permits and any conditions attached remains high.

1.3.7 The Council has an important role in protecting the public from hazards associated with contaminated land. There are three principal aspects to this role:

- identification and prioritisation of known areas of contaminated land within the Borough;
- ensuring that, through the planning process, areas of potentially contaminated land are identified, investigated and remediated during the development process; and
- responding to specific enquiries from potential property purchasers who have had concerns raised about potential contaminated land on their prospective property.

1.3.8 As well as providing input into planning permission consultations as already discussed in 2019/20 the EPT provided 18 reports in relation to specific contaminated land enquiries, the majority from prospective property purchasers.

1.3.9 Members may recall that in August 2019 the EPT in conjunction with Ecologia Ltd began a detailed landfill gas investigation at the Priory Wood Public open Space in South Tonbridge. This work is now drawing to a close (at time of writing) with a full site risk assessment for landfill gas being produced. A detailed report to board on this matter will be provided in due course.

1.3.10 There are a number of private water supplies (PWS) in the Borough and to safeguard the health of people consuming water from these supplies the team is required to risk assess and sample these supplies. Most occur in residential properties, although there are some commercial premises that maintain a private water supply. Samples were taken as required during the year to ensure the supplies met required standards, and no Statutory Notices for failures of sample quality were required in this period.

1.3.11 The Local Air Quality Management (LAQM) regime requires the Council to periodically review and assess the air quality within its area. To fulfil these duties officers in the EPT monitor Nitrogen Dioxide levels across the Borough using diffusion tubes and a continuous analyser (Wateringbury) with a second continuous monitor installed in Tonbridge High Street in October 2019. The results of this monitoring are reported annually to the Department for the Environment, Food and Rural Affairs (DEFRA). During the year there were no new exceedances of annual or hourly NO_2 levels and no new AQMAs were required to be declared.

1.3.12 Finally members will note that the number of complaints received about odours in Tonbridge associated with the Drytec factory has remained steady between 60 and 70 per year over the past three years. Officers continue to investigate whether

the odour amounts to a statutory nuisance at complainant's properties, however the test of statutory nuisance is not whether an odour is present but whether its nature, extent and degree including its frequency and duration is sufficient to materially interfere with the use and enjoyment of property. In that regards no evidence has been obtained to date that the odour at any one property amounts to a statutory nuisance.

1.4 **Legal Implications**

1.4.1 The Council has a statutory duty to undertake the full range of functions described in this report, with the exception of promotional and business support activity.

1.5 **Financial and Value for Money Considerations**

1.5.1 All services offered are managed within existing budgets.

1.6 **Risk Assessment**

1.6.1 Failure to properly manage and deliver the food safety functions could result in censure by the Food Standards Agency and breach of Section 18 of the Health and Safety at Work etc. Act 1974.

1.6.2 The failure of the EPT to meet its statutory obligations could result in formal complaints and potential censure from DEFRA and the Local Government Ombudsman. It could also lead to a potential legal challenge.

1.7 **Equality Impact Assessment**

1.7.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.8 **Recommendations**

1.8.1 It is **RECOMMENDED** that the Cabinet **NOTE** the performance information relating to activities associated with the food and safety and environmental protection functions in 2019/20.

Background papers:

Nil

contact:
Melanie Henbest
Crispin Kennard

Eleanor Hoyle
Director of Planning, Housing and Environmental Health

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ANNEX 1

FOOD HYGIENE INTERVENTIONS

Premises risk rating and frequency	No. interventions carried out 2017/18*	No. interventions carried out 2018/19*	No. interventions carried out 2019/20*
A – 6 months	4	7	16
B – 12 months	76	67	57
C – 18 months	217	201	212
D – 2 years	169	149	184
E – 3 years **	282	143	82
Unrated (new business registrations)	185	143	118
Total	933	710	669

*** All interventions carried out , includes inspections, re-visits, sampling visits, advice and education, information and intelligence gathering.**

**** Includes low risk premises questionnaires**

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ANNEX 2

SUMMARY OF NATIONAL FOOD HYGIENE SCHEME RATINGS

Rating	Number of businesses	%
Five (Very Good)	577	68
Four (Good)	191	22
Three (Generally Satisfactory)	67	7.8
Two (Improvement Required)	18	2.1
One (Major Improvement Required)	1	0.1
Zero (Urgent Improvement Required)	0	0
Total	854	100

Data correct as of 20 July 2020.

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ANNEX 3

FOOD SAMPLING PROGRAMME

DATE	SAMPLING PROGRAMME	RESULTS
April 2019-March 2020	UK Co-ordinated Food Study- Study 67 Vacuum/Modified atmosphere packed RTE food and swabs.	30 samples taken 27 satisfactory 3 borderline (acceptable)
April 2019-March 2020	UK Co-ordinated Food Study- Study 68 Raw milk cheeses (UK and non-UK).	9 samples taken, all satisfactory
January 2020-April 2020	UK Co-ordinated Food Study- Study 69 Flour from Retail, Catering and Manufacturing premises.	12 samples taken, all satisfactory
April 2019-March 2020	TMBC Food complaints and food poisoning allegations	25 samples taken 21 satisfactory 2 borderline (acceptable) 2 unsatisfactory
April 2019-March 2020	TMBC Routine sampling programme including manufacturers and producers	77 samples taken 61 satisfactory 6 borderline (acceptable) 10 unsatisfactory
Total number of samples: 153 Of which 130 were classified as satisfactory were 11 classified as borderline (acceptable) were 12 classified as unsatisfactory		

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REQUESTS FOR SERVICE **Annex 4**

Service Request Category	2016/17	2017/18	2018/19	2019/20	Apr-Aug 2019 / Apr -Aug 2020	Comments
Accumulations	**47**	**33**	**44**	**44**	15 / 21	**Complaints regarding accumulations including commercial and residential premises.**
Drainage	**8**	**8**	**8**	**9**	5 / 0	**Blocked, leaking or overflowing private drains, private sewers and septic tanks**
Noise	**181**	**203**	**191**	**191**	122 / 171	**Sources include amplified music from domestic and licensed premises**
Dogs	**112**	**92**	**105**	**86**	52 / 41	**Barking dogs**
Pollution	**92**	**93**	**91**	**73**	48 / 85	**e.g. bonfires, odour, smoke, grit and dust and light**
Tonbridge Odour complaints (excluding tweets)	**69**	**60**	**65**	**68**	37 / 55	
TOTAL	**509**	**489**	**504**	**471**	279 / 373	

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ANNEX 5

FORMAL ACTION 2019/20 - SERVICE OF STATUTORY NOTICES

Notice	2016/17	2017/18	2018/19	2019/20	Example
Environmental Protection Act 1990 section 80	6	9	4	1	**Statutory nuisance e.g. noise, accumulations**
Prevention of Damage by Pests Act 1949 section 4	0	0	0	0	**Control of rats and mice**
Public Health Act 1936 section 83 (As amended)	0	0	0	0	**Filthy and Verminous Premises**
Local Government (Miscellaneous Provisions) Act 1976 section 16	0	0	0	1	**Requisition for Information**
Local Government (Miscellaneous Provisions) Act 1982 section 29	0	0	0	0	**Securing premises against unauthorised access**
Control of Pollution Act 1974 sec 60	0	0	0	0	**Control of Noise on construction sites**
Control of Pollution Act 1974 section 61	1	0	8	2	**Prior consent for construction works.**
The Private Water Supply Regulations	0	0	1	0	**Notification of failure to comply with the required standards for PWS and actions required to remedy the failures.**
TOTAL	7	9	13	4	

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TONBRIDGE & MALLING BOROUGH COUNCIL

STREET SCENE and ENVIRONMENT SERVICES ADVISORY BOARD

05 October 2020

Report of the Director of Street Scene, Leisure & Technical Services

Part 1- Public

Matters for Information

1. WASTE & STREET SCENE SERVICES UPDATE

Summary

This report highlights a number of issues & initiatives managed by the Waste & Street Scene Services team since the last meeting of this Board.

1.1 Pest Control Contract – Retendering

1.1.1 The current Pest Control Contract, procured in 2013, was due to end on 31 October 2018, with an option to extend by one period of 24 months. Due to the fact that the contractor, Monitor, was performing well with an exceptionally low level of complaints received, the contract extension was agreed and the contract is now due to end on 31 October this year.

1.1.2 The contract was let in partnership with Tunbridge Wells Borough Council, and was originally procured by their procurement team. The contract operates on a referral basis, with all customers being put through to Monitor who will then deal with the report, take payments, and book & carry out any treatments, including follow up visits as required. Residents in receipt of Council Tax Reduction are entitled to a free treatment (for a limited range of health-related pest issues). In these cases, TMBC staff check their entitlement before passing the customer through to Monitor. Monitor then invoice TMBC monthly for these subsidised cases, which amounts to an average of £300 per month. Monitor also pay a one-off annual referral fee to TMBC of £2,000 for those non-subsidised cases referred to them. The contract also allows for optional services to be provided for TMBC's own estates such as the council offices and country parks. This arrangement has worked particularly well since Monitor took over the contract, and the net cost to TMBC is around £1,500 per year.

1.1.3 Due to EU & UK Procurement Legislation, with the potential costs of the new contract being an unknown, it was decided to go out to open tender for the new contract which will start in November. Again, this is being carried out in partnership with TWBC, with their procurement team leading on the project. The tender specification stipulates that a similar arrangement to that we currently have

with Monitor is provided. Tender documents were issued on 24 August, with a closing submission date of 21 September. As of that deadline six submissions have been received, two of which were non-compliant. The remaining four are being evaluated during w/c 21 September.

1.1.4 The evaluation criteria is based on Price at 60%, Quality of submission at 35%, and the final 5% will be based on performance at interview. Interviews will be held during w/c 29 September, with contract award due to be announced w/c 5 October. As such a verbal update is likely to be available for this Board meeting.

1.2 Dog Warden Contract – Retendering

1.2.1 The current Dog Warden contract, also procured in 2013, was due to end on 28 February 2020, with an option to extend by one 12 month period. Due to the fact that the contractor, Ward Security, was performing well with an exceptionally low level of complaints received, the contract extension was agreed and the contract is now due to end on 28 February 2021.

1.2.2 The current budget for this contract is £73,450, which includes around £25,000 per year in kennelling fees. The service assists the Council in not only delivering its statutory duties relating to stray dogs, but also with the investigation of other dog-related issues such as noise, fouling, dangerous dogs, dog control & behavioural issues, micro-chipping, and proactive educational initiatives such as Bag & Flag events & signage. This contract also provides the necessary van & equipment to deliver these services, as well as cover when the regular dog warden is on leave, off sick or otherwise absent.

1.2.3 The Council has a statutory duty to deal with stray dogs, including their safe kennelling until either claimed or rehomed. The current arrangement with Ward Security limits the liability for these kennelling fees to seven days, after which time the responsibility for kennelling costs passes to their sub-contractor, Viking Oak Kennels. This is of great benefit as other dog warden service arrangements mean that the council bears the burden of all kennelling costs until such time a dog can be rehomed, or in the rarer case of aggressive behavioural issues, put to sleep. The contract also provides a stray dog collection service out of normal office hours, and this is currently particularly busy at evenings and over weekends.

1.2.4 Due to EU & UK Procurement Legislation, and given the current & potential costs of the new contract being an unknown, it was decided to go out to open tender year for the new contract which will start on 1 March 2021. It is expected that this process will be assisted by Dartford Borough Council's procurement team, who have ably assisted with many other tender processes for TMBC in the past. Further details of this procurement process will be brought to a future meeting of this Board.

1.3 Household Waste Recycling Centre – KCC Update

1.3.1 Within the geographical county of Kent, Household Waste Recycling Centres (HWRCs or "tips") are provided and managed by the relevant Waste Disposal Authority for their residents. Medway's HWRCs are run by Medway Council for their residents, and Kent's HWRCs by Kent County Council. There has been a reciprocal arrangement in place for a number of years whereby KCC pay Medway County Council an annual amount so that KCC residents who live nearer to Medway's HWRCs can use them rather than having to travel further to a KCC site. This has meant that residents towards the north of the Borough have been able to use Medway's facility at Cuxton.

1.3.2 For many years TMBC have made representation to KCC to provide a HWRC facility within the borough, as the nearest alternatives for our residents are the HWRCs at North Farm (Tunbridge Wells), Tovil (Maidstone), Dunbrik (Sevenoaks) or Medway's sites at Cuxton & Capstone. We reported to an earlier meeting of this Board that KCC had identified suitable locations for such a facility and that they had started progressing the procurement process for it.

1.3.3 A procurement process has now taken place, and a facility at Allington, next to the existing energy-from-waste plant, is being progressed. At the most recent Parish Partnership Panel on 3 September, Cllr Hohler of KCC gave the following update:

"*On 15th July members of KCC's Planning Committee unanimously approved the proposal by FCC Environment (UK) Ltd to establish a Household Waste and Recycling Centre on Laverstoke Road, Allington. The proposed HWRC will be a split-level facility with 22 recycling container bays with 25 car spaces, including one accessibility space. The lower level will include a two-storey office and shop with 33 parking spaces for members of staff and visitors to the re-use shop. A new access junction will be constructed off Laverstoke Road to the north of the existing priority junction for the Allington waste incinerator*."

1.3.4 Once we have further details from KCC regarding an estimated opening date for this facility, we will update this Board accordingly.

1.4 Kent Resource Partnership – Fly Tipping Initiatives

1.4.1 Kent County Council has provided £250,000 in funding for this financial year to help support the district and borough councils to tackle fly tipping. Working with the Kent Environmental Crime Practitioner's Working Group (membership includes KCC, all 12 district/ borough councils, Kent Police, the Environment Agency and the National Farmers Union, ideas have been sought from all parties as to the best way to utilise the funding to help tackle this illegal activity. Some of the key plans for this financial year include:

- Further significant investment into technology and equipment – for example deployment of covert cameras to fly tipping 'hotspots'

TMBC have provided a list of "hot spot" locations where fly tipping occurs repeatedly, often before the initial tip can be cleared. Ten locations have

been shortlisted for camera deployment by KCC's Intel Unit, and a start has already been made on installing them

- Continuing to work with Kent Police to deliver 'Days of Action' across the County, supported by intelligence packages, to target known fly tipping offenders and make vehicle stops and seizures for those carrying waste without the correct licenses

TMBC officers are to shadow an upcoming action day so that they can see what is involved and what action can be taken by each of the parties attending. This will ensure a consistent approach across Kent in terms of enforcement action taken. Once that has taken place, the Intel Unit will set dates for TMBC's area

- Building on the communication campaign delivered in 2019/20 regarding residents and business Duty of Care in relation to waste disposal – the focus is on those rogue traders and groups, collecting waste for small amounts of money and subsequently fly tipping the waste – further information videos to be released shortly regarding the 'victims of fly tipping'

TMBC have previously run our own "Duty of Care" campaign, and have guidance & a form available on our website for householders to download so they can easily check if the person they're using to take waste away is a registered waste carrier and has reliable disposal facilities available to them. We have also shared previous educational & publicity materials via social media channels, and have obtained additional signage to place at fly tipping "hot spots". These new materials will also be broadcast once available.

- Building on the small business waste courses delivered last year (pre-Covid), to provide information to small businesses regarding their responsibilities for waste collection and disposal – with the potential to consider an e-learning package to offer to businesses

A course for TMBC small businesses was originally booked for May but was cancelled due to the Covid lockdown & associated guidance on training course attendance. The e-learning package will be accessible to far more businesses once developed (only 15 were able to attend each course session, with only one per council area provided), and we will work with Kent & KRP colleagues to ensure this is made available as soon as possible.

- Engaging with the courts through Magistrates Associations last in order to raise the issue of the low level of fines & costs being awarded to offenders, even when they have been previously fined or prosecuted.

Often the court fines are lower than the level of the £400 Fixed Penalty Notices councils are able to issue for lower level offences, and costs

awarded lower than the actual clear up costs. Other county-wide partnerships have asked to join the KRP's representations, which may assist in this issue being treated seriously not just across Kent but nationally.

1.5 Great British Spring Clean 2020

1.5.1 The Great British Spring Clean is a national initiative launched several years ago by Keep Britain Tidy, the national campaign organisation which aims to raise awareness of litter and its impact on the natural & built environment.

1.5.2 The 2020 Spring Clean was due to take place in March, but was understandably cancelled due to the Covid lockdown and Government guidance on gatherings outside of the home. As such, Keep Britain Tidy postponed the event until September and have issued further guidance on the organisation of community litter picks whilst adhering to latest government guidance on gatherings & events outside of the home. The nationwide event is running from 11 to 27 September, and we will be able to provide an update to the next Board meeting regarding activities that are taking place within the Borough during September.

1.6 Christmas Collection Arrangements 2020/21

1.6.1 Although it may seem a little early to be mentioning Christmas and New Year collection arrangements, there are ongoing discussions with Urbaser and with KCC as the Waste Disposal Authority regarding the most efficient schedule for collections over the holiday period taking into account restricted disposal outlet availability on the Bank Holidays and at weekends. Final details of the arrangements will be presented to this Board in November.

1.6.2 In previous years, we have provided advance notification to residents via bin hangers on the lead up to the Christmas period. However, due to the significant impact of Covid on the Council's budgets and the ongoing policy of approving essential spending only, it has been decided not to issue the bin hangers this year. The cost of last year's hangers was around £12K including delivery.

1.6.3 Earlier this year, we took a similar decision with the new annual recycling calendar which would have normally been distributed in June. Instead of printing & delivering 55,000 calendars at a cost of around £10K, we instead had a small supply of hard copied printed which were then made available on request. A downloadable leaflet was posted on our website & a link to it posted via social media channels. We have received no complaints from residents as a result, and only a very small amount of hard copy requests to be posted out.

1.6.4 As such, we intend to communicate the Christmas arrangements in the same way There is not due to be any suspension of services, which in previous years would have caused a lot of confusion without the bin hangers, and details will be publicised on our website & social media channels, as well as via our telephone message system.

1.7 Legal Implications

1.7.1 The Council has a statutory duty to provide refuse and recycling collection services. The retendering of the Pest Control and Dog Warden contracts are in accordance with contract conditions and relevant procurement regulations.

1.8 Financial and Value for Money Considerations

1.8.1 The two tendering processes detailed above may result in an increase – or decrease – in the Council's costs for providing those two services. Although this impact is as yet unknown, Finance colleagues will be informed as to the potentially successful tender bids in order for them to be able to assess any potential impact both on this financial year's budget estimates and on the Councils' MTFS. The initiative detailed at 1.6 above will contribute towards the Council's savings, and the current policy on essential spending.

1.9 Risk Assessment

1.9.1 Careful planning, good communication with residents and coordinated arrangements for collections, help to ensure minimal disruption and effective delivery of these high profile services.

1.10 Policy Considerations

1.10.1 Communications

1.10.2 Community

1.10.3 Customer Contact

Background papers:

Nil

contact: David Campbell-Lenaghan

Robert Styles
Director of Street Scene, Leisure & Technical Services

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT INFORMATION

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Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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