



Ashford Borough Council Overview and Scrutiny Committee

Final Report of Air Quality Task Group

Air Quality Task Group

Final report to Overview and Scrutiny Committee Foreword from the Task Group Chairman

Public Health England estimate that particulate air pollution in the Borough of Ashford is a contributory factor in 50 deaths per year, and it is this alarming statistic that has driven the work of the Air Quality Task Group to research pollutant sources and identify ways to avoid a decline in and, where possible, improve the standard of our air quality.

This report outlines a wide-ranging series of actions designed to address both policies and practices within the Council which impact upon air quality; as well as recommending certain actions for partner organisations to take forward under their respective responsibilities.

We recognise that whilst the Council can (and should) set the standard for others to follow, actions undertaken by the public at large will be the principal driver of improvements in air quality. Under this ambitious air quality strategy for the Borough, the Council will strive to facilitate the means for positive changes in our air quality.

Through enabling increased use of ultra-low and zero emission vehicles, to promoting a range of sustainable transport options and making more information available to residents, the actions within this report will set the conditions for the Borough to address airborne pollutants and the health risks associated with them.

Rapid advancements in vehicle technology and the changing nature of government policy on air quality mean that this strategy will need to exist as a living document, regularly reviewed to ensure that the measures pursued to safeguard and improve our air quality are effective and appropriate.

I would like to thank the Members of the Task Group and officers from across the Council for the hard work they have put into this report, and commend it to the Overview and Scrutiny Committee.

Councillor Peter Feacey
Member for Godinton (Ashford) Ward
Chairman, Air Quality Task Group

Air Quality Task Group

Final report to Overview and Scrutiny Committee Executive Summary

This report presents the findings and recommendations of the Overview and Scrutiny Air Quality Task Group as the basis for an Air Quality Strategy for the Borough. The assistance of the Overview and Scrutiny Committee in preparing an Air Quality Strategy was requested by the Council's Health, Parking and Community Safety service during scrutiny of the Council's draft 2017/18 budget.

In response to this request and existing Member concerns over the state of air quality in the Borough, the Overview and Scrutiny Committee assembled a task group to research the causes and impacts of poor air quality and explore possible measures to reduce air pollution in the Borough. This report is the culmination of Members' analysis of evidence gathered from external source publications and Council officer testimonies, and is designed to complement and support the existing Energy Efficiency Strategy.

A principle focus for the Task Group's work was the estimated mortality burden associated with particulate air pollution. Public Health England (PHE) estimate that particulate air pollution is a contributory factor in 50 deaths in the Borough per year, with an equivalent of 539 life-years lost from the Borough's population each year through exposure to particulate air pollution.

Despite measured pollutant concentrations in the Borough being below national limit values and no Air Quality Management Areas having been declared within the Borough, Members felt that there should be an increased focus on air quality in the Council's policies and operations, particularly given the health impacts highlighted by PHE and the continued growth of Ashford.

The principle source of air pollution in the Borough is road traffic, and consequently the majority of actions recommended under this report focus on reducing pollution from road traffic – through enabling greater uptake of ultra-low and zero emission vehicles; encouraging increased use of sustainable transport options such as bus travel and cycling; and enhancing the Council's own policies with regard to lease cars, mileage schemes and fleet operations.

The report makes a total of 29 recommendations intended collectively to form a strategy for mitigating air pollution and where possible improving air quality in the Borough. Within these recommendations, Members felt that nine were particularly key to the successful delivery of an Air Quality Strategy, and these are listed in the table below.

A further 10 recommendations relate specifically to the recognition and continuation of existing good practice or working in partnership with external agencies. A full summary of all recommendations is attached to the report as Appendix A.

No.	Recommendation
1	The recommendations and evidence base contained within this report form an Air Quality Strategy for the Council.
3	The Council adopt the points noted in table 2 on page 9 of the report as best practice guidance for reducing air pollution in new developments.
5	The Council should expand the network of electric vehicle charging points within the borough, utilising S106 and government grant funding as appropriate.
6	The Council work with Kent County Council to explore options for providing on-street vehicle charging infrastructure to meet resident demand, including promoting relevant OLEV grant schemes and other trials.
14	The Council consider subsidising a programme of fuel-efficient driver training for taxi and private hire drivers.
15	That new commercial developments include adequate provision for facilities to enable and support cycling to work by staff.
19	The Council should review its lease car and mileage claim schemes to exclude high polluting vehicles from eligibility and promote ultra-low and zero emission vehicles.
22	The Council operate a programme of fuel-efficient driver training for all designated essential car users who are required to drive Council fleet vehicles for their respective roles.
26	The Council consider the appointment of an officer to lead on Sustainability; research and apply for appropriate grant funding; and deliver on the aims of the Energy Efficiency Strategy and any actions adopted from this report for inclusion in the Air Quality Strategy.

Air Quality Task Group

Final report to Overview and Scrutiny Committee

Introduction

1. During scrutiny of the Council's draft 2017/18 budget, the development of an Air Quality Strategy was highlighted as a priority for the Council's Health, Parking and Community Safety service. The Head of Service advised at the time that input into this strategy from the Overview and Scrutiny Committee would be welcomed.
2. In response to this request and Member concerns over the standard of air quality in the Borough, the Overview and Scrutiny Committee constituted a five member Task Group to undertake a review into air quality in the Borough.
3. In 2014, Public Health England released '*Estimating Local Mortality Burdens associated with Particulate Air Pollution*'¹ which estimated that air pollution in Ashford contributed to 50 attributable deaths² and 539 associated life-years lost³ per year.
4. Whilst there are no anticipated exceedances of statutory limit values for key pollutants within the Borough, there is concern over the impact of air pollution on public health and that the principal aim of the strategy should be to put in place actions which would serve to reduce the number of attributable deaths and life-years lost in the Borough related to poor air quality.
5. In undertaking this review, the Task Group considered evidence on air pollution causes and mitigation measures including Air Quality Status Reports for Ashford, existing Council practices, guidelines from the National Institute for Clinical Excellence (NICE), officer testimony and the UK Air Quality Plan produced by DEFRA.
6. In advance of the Task Group's first meeting the Corporate Scrutiny and Overview Officer conducted an evidence gathering session with officers from Planning and Development, Cultural Services, Housing, Environmental Protection, HR, Parking, Corporate Property and Procurement to establish an evidence base of current policies and planned actions which impact on air quality.
7. The Task Group considered this evidence base at its first meeting to determine which Council departments it would invite in to hear further evidence from. Members met on three subsequent occasions and heard from officers from the Council's Environmental Protection, Parking and Cultural Services teams.

Background

8. National air quality objectives concern three pollutants: nitrogen dioxide (NO₂), particulate matter with a diameter less than or equal to 10 micrometres (PM₁₀), and sulphur dioxide (SO₂). A summary of the

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf

² Where long-term exposure to air pollution is understood to be a contributory factor to

deaths from, for example, respiratory and cardiovascular disease.

³ The years of life lost to the population due to an increased mortality risk attributable to long-term exposure to particulate air pollution.

health and environmental effects of these pollutants is included in table 1 below.

9. Recent central government action on air quality (including the publication of the *UK Air Quality Plan for tackling Nitrogen Dioxide*) has been focused primarily on addressing excessive concentrations of NO₂ around roads.

10. The primary sources of NO₂ and PM₁₀ in the UK are road transport related, while SO₂ primarily arises from the burning of fossil fuels in power stations, oil refineries and industrial plants. The lack of large industrial processes (and so significant generating sources of SO₂) in the Borough has meant that actions have primarily been focused on reducing road transport related pollution.

Table 1 – Air Quality Objectives in England, summary of effects

Pollutant	Human health effects	Environmental effects
Nitrogen dioxide (NO ₂)	Long-term exposure may decrease lung function and increase the risk of respiratory symptoms.	High levels damage plant life. Contributes to the formation of acid rain which damages vegetation, buildings and water courses.
Particulate matter (PM ₁₀)	When inhaled, particles may be carried into the lung and exacerbate respiratory conditions such as asthma. Concerns also exist over the inhalation of potentially carcinogenic particulates. Smaller particles (PM _{2.5}) are thought to pose the most serious threats as they can be carried deeper into the lungs. Recent research by Queen Mary University of London and Oxford University has also shown a link between particulate matter and heart damage.	Damaging to plants, materials and buildings. Research suggests that particulate pollution may contribute to global warming through contamination of other species and the reduction of their reflective properties, resulting in absorption rather than reflection of the sun's rays.
Sulphur dioxide (SO ₂)	Exposure to sulphur dioxide as air pollution can irritate the eyes and respiratory system. Even at normal environmental concentrations it can harm sensitive individuals (such as those suffering from lung disease).	Reacts to form acid rain. Sulphur oxides and sulphuric acid are related to the damage and destruction of vegetation, construction material, watercourses and soil deterioration.

Local Air Quality Management

11. Ashford Borough Council undertakes air quality monitoring in the Borough via a network of diffusion tubes (measuring NO₂ concentrations) in various locations. It also has a statutory duty⁴ to periodically review and assess air quality, including comparing measured and predicted pollutant levels to national air quality standards and objectives. Maps of

the current non-automatic monitoring locations are attached as Appendix B.

12. The Council also has responsibility for regulating emissions from certain industrial processes within the Borough such as vehicle re-sprayers, cement batching plants and petrol stations. Regulation of large industries such as power stations, incinerators and chemical plants is

⁴ Under Part IV of the Environment Act 1995

carried out by the Environment Agency.

13. The Council's 2017 Air Quality Status Report (ASR) confirmed that air quality in Ashford continues to meet the relevant air quality objectives, with no significant changes in existing emissions sources being identified and no new relevant industrial installations or significant new commercial or domestic sources of emissions being identified.
14. Therefore, the main source of air pollution in the Borough is road traffic emissions from major roads, notably the M20, A20, A28 and A292, although commercial, industrial and domestic sources also contribute to background pollution concentrations.
15. Measured (NO₂) concentrations in the Borough are highest in Lees Road, Willesborough. This monitoring site is the closest in proximity to junction 10 of the M20.
16. In considering the evidence presented to the Task Group, Members determined that a holistic approach to addressing air quality would be required across a number of different areas.

Recommendation 1:

The recommendations and evidence base contained within this report form an Air Quality Strategy for the Council.

**Planning Policy
Local Plan to 2030**

17. As discussed above, the majority of air pollution in the Borough is attributable to road traffic. Consequently, exploring ways to achieve a reduction in road traffic related air pollution has been the

primary focus of the Task Group's work.

18. It is recognised that a wholesale transition from conventional fuels to alternative fuels is beyond the Council's control, however the Council could do much to provide the necessary infrastructure to serve the expanding demand for electric and plug-in hybrid vehicles; and facilitate greater uptake of sustainable transport options within the Borough.
19. At its second meeting the Task Group considered guidelines produced by NICE which set out aims to improve air quality and public health through the planning process. Members also considered policies relating to air quality and sustainability as contained in the Draft Local Plan to 2030.
20. The Task Group noted the commitment to development in support of renewable and low carbon energy (policy ENV10); that achieves sustainable design and construction (policy ENV11); and does not contribute to poor air quality (policy ENV12). These policies, the content of which is included as Appendix C, were supported and Members agreed the importance of adopting the local plan to 2030.
21. It was felt that an increased uptake of electric and hybrid vehicles in the borough, and the consequential increase in home charging, that there may be validity in seeking methods to off-set pollutant generation at power stations outside the Borough through the use of renewable energy generation at the point of charging. Within the draft Local Plan, the supporting text for policy ENV10 highlights a range of renewable energy options within residential development including the use of

solar photovoltaic (PV) panels where appropriate.

22. Members also noted policy TRA4, relating to the promotion of the local bus network, and supported a drive for enhancements to bus services in the Borough.
23. In addition, the NICE guidelines recommend that development sites likely to generate a significant volume of traffic should be supported by travel plans. Policy TRA8 within the draft Local Plan to 2030 accords with this recommendation.
24. Members noted that policy ENV12 as currently contained within the Draft Local Plan to 2030 required consideration of Air Quality impacts for major developments only; and that as part of the initial evidence gathering for the Task Group, Planning Policy officers had advised that the majority of developments coming forward under the Local Plan were expected to have a 'negligible' effect on air quality.
25. Concerns were expressed (particularly when considering the continued pace of growth in Ashford) regarding the cumulative air quality impact of multiple smaller developments. Members felt that there should be a heightened focus on securing a reduction in airborne pollutant concentrations in Ashford through the rigorous application of policy ENV12.
26. The NICE guidelines considered by the Task Group suggest that local authorities should consider using a Community Infrastructure Levy (CIL) system to gather contributions from developers to fund additional air quality monitoring sites, or to pay for

infrastructure changes to reduce the risk of poor air quality within an area.

27. Members noted that the Council does not have a currently implemented CIL regime, but that clarification from central government on the future of CIL is awaited before a decision is made on implementation in Ashford.

Recommendation 2:

If a CIL regime is adopted by the Council for new developments, contributions should be set aside for air pollution mitigation measures.

Development Control Planning Conditions

28. Members heard from the Council's Environmental Protection and Licensing Team Leader with regard to reducing air pollution in the Borough, noting that there had not necessarily been a strong focus on air quality in the past.
29. Evidence gathered from the Council's Planning Policy team noted that developers could be compelled to contribute financially towards poor air quality mitigation, although there must be a strong evidential basis that development will contribute to a worsening in air quality to justify such conditions.
30. Noting the difficulty in securing developer contributions to mitigate against poor air quality, Members felt that a more suitable route to encourage improvements in air quality in the Borough would be for the Council to set out 'best practice' guidance for developers which, whilst proposing relatively low-impact measures, could do much to reduce the risk of poor air quality within new developments and encourage greater

uptake of sustainable transport options in the Borough.

31. The Task Group recommends the standard use of five conditions that could be applied to planning permissions as relevant, suggested

by the Environmental Protection and Licensing Team Leader as a 'best practice' guide for air quality improvements in new development proposals within the Borough (listed in table 2).

Table 2

Recommendation 3 - The Council adopt the following as best practice, to be applied to planning permissions as appropriate, for reducing air pollution in new developments:

- Each proposed dwelling with a designated parking space provided by means of a driveway, carport, or garage should be provided with at least one Electric Vehicle charging point. Such charging point may be a dedicated Electric Vehicle charging socket, or suitably rated three-pin socket capable of safely providing a slow charge to an Electric Vehicle via a domestic charging cable.
Reason: To take into account the cumulative impacts of development on air quality and to encourage the use of sustainable transport modes including incorporation of facilities for charging plug-in vehicles.
- Each dwelling to be provided with gas-fired boilers should meet a minimum standard of <40mgNOx/kWh.
Reason: To take into account the cumulative impacts on air quality from individual sites in local area
- Major developments should be carried out in accordance with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction.
Reason: To take into account the cumulative impacts on air quality from individual sites in local areas, and to ensure permitted operations to not have unacceptable adverse impacts on human health.
- Major residential development with unallocated off street car parking should be provided with a minimum of one dedicated Electric Vehicle Charging point per ten spaces for the use of the car park user, and be maintained thereon.
Reason: To take into account the cumulative impacts of development on air quality and to encourage the use of sustainable transport modes including incorporation of facilities for charging plug-in vehicles.
- Major Commercial/Retail/Industrial development with parking provision for ten or more car parking spaces should be provided with a minimum of one Electric Vehicle Charging point (increasing to an additional point for every additional thirty car parking spaces) for the use of the car park user, and be maintained thereon.
Reason: To take into account the cumulative impacts of development on air quality and to encourage the use of sustainable transport modes including incorporation of facilities for charging plug-in vehicles.

Development Control Natural Environment

32. The Task Group considered NICE guidelines related to planting strategies and the air quality impacts of managed green space, noting additional guidance from the Forestry Commission⁵ on the use of vegetation for mitigating particulate pollution.
33. It was noted that the dualling of the A28 Chart Road was expected to ultimately increase the total number of trees along a key transport corridor; that the Council had long-standing commitments to securing quality green space throughout the Borough; and pollutant dispersal in the town centre was aided by the relative (current) lack of build-up.
34. Members felt that the Council should look to influence air quality when considering planting strategies for existing open spaces and new developments, particularly along key transport corridors where pollutants will be most concentrated.

Recommendation 4:

The Council should adopt, and require developers to abide by, planting strategies which will support pollutant mitigation and effective street ventilation.

Transport Passenger Vehicles

35. As noted in paragraph 13, the main contributory sources of key pollutants are vehicle emissions. Vehicle emission limits are set to the Euro emission standards, which aim to reduce the levels of harmful exhaust emissions with higher euro standards imposing tighter limits on the levels of pollutants that a vehicle may produce. The current highest standards are Euro 6 (for passenger cars, introduced in 2014) and Euro VI (for large commercial vehicles, introduced in 2013).
36. EU member states are required to achieve reductions in population exposure to particulate matter with a diameter equal to or less than 2.5 micrometres (PM_{2.5}), with the UK required to achieve a 15% reduction in average exposure between 2010 and 2020. Although local authority responsibilities for particulate concentrations are limited to PM₁₀, many control measures will contribute to reductions of finer particulate matter.
37. Achieving a reduction in roadside concentrations of NO₂ is the focus of DEFRA's air quality plan (published in July 2017). The setting of higher Euro emission standards for diesel passenger vehicles has not resulted in expected reductions in Nitrogen dioxide (and Nitric Oxide, collectively NO_x) compared to petrol passenger vehicles, largely due to disparities between laboratory testing and real-world performance.
38. The well-publicised issues of certain vehicle manufacturers utilising software to cheat emissions testing led to the introduction of a 'real driving emissions' (RDE) test procedure to better reflect real-world performance.
39. A comparison of relative pollutant values for petrol and diesel cars, which shows the relative polluting impacts of each fuel type for carbon monoxide, hydrocarbons, oxides of nitrogen, particulate matter and carbon dioxide can be seen in table 3.

⁵ <https://www.forestry.gov.uk/fr/urgc-7edhgh>

Table 3 - Emissions for Road Vehicles (per vehicle kilometre)

Vehicles	Carbon monoxide	Hydrocarbons	Oxides of nitrogen	Particulate matter	Carbon dioxide
Petrol cars without a catalyst*	100	100	100	---	100
Petrol cars with a catalyst	42	19	23	---	100
Diesel cars	2	3	31	100	85

*Petrol cars without catalysts have been given a relative value of 100 for comparison

40. Central Government have signalled an ambition for all new cars and vans to be zero emission by 2040. The main focal approach for this change has been increased support (including grant funding) for electric and hybrid vehicles and associated infrastructure.

41. The Council currently maintains a network of five double electric vehicle charging points in car parks across the borough, allowing up to 10 vehicles to charge simultaneously. In discussion over the ambition outlined in the above paragraph, and the recent growth in the electric vehicle market, Members felt that it was important that the Council acted now to increase the extent of electric vehicle charging infrastructure in the borough to meet future demand, and to set the standard for charging provision in the Borough.

42. The Council's Parking Services Team Leader reported to the Task Group that changes to the ownership of the company who administered the Council's charging points had removed maintenance charges from the Council's contract and resulted in a greatly reduced capital cost for charging points.

43. The Council's Section 106 Monitoring Group reported that a limited pot of

S106 contributions was available to fund environmental improvements in the Borough. The Task Group members felt that this pot could, subject to the identification of suitable projects, provide a readily viable means of funding the supply and installation of an expanded network of electric vehicle charging points within the Borough, particularly considering the reductions in capital cost outlined by the Parking Services Team Leader.

Recommendation 5:

The Council should expand the network of electric vehicle charging points within the borough, utilising S106 and government grant funding as appropriate.

44. The Office for Low Emission Vehicles (OLEV) recognises that most electric and plug-in hybrid vehicle owners will wish to do the largest proportion of vehicle charging at home. Off-street electric vehicle charging needs can feasibly be addressed through recommendations 3, 6, 7 and 8; however it was noted by the Task Group that for residents who have no access to off-street parking, electric vehicles would not be an attractive alternative to conventional fuel vehicles due to the lack of access to overnight charging facilities.

45. OLEV operates a grant scheme to enable local authorities to provide residential on-street charging points for residents who have no access to any off-street parking facility. OLEV will provide up to 75% of the capital costs of procuring and installing a charging point and dedicated parking bay (up to a maximum of £7,500 per point).⁶

46. The London Borough of Hounslow are currently running a three year trial (funded by TfL) of on-street charging infrastructure provided through fitting 4G enabled electric vehicle charging points to existing streetlights at an approximate cost of £1000 per unit. It is understood that Kent County Council are monitoring the outcome of this trial, and Members felt that dependent on the outcome of this trial the Hounslow model could provide a means of providing on-street charging infrastructure for the significant number of residents within the Borough who have no access to off-street parking.

Recommendation 6:

The Council work with Kent County Council to explore options for providing on-street vehicle charging infrastructure to meet resident demand, including promoting relevant OLEV grant schemes and other trials.

47. Road traffic related air pollution is worsened when traffic is stationary and idling, particularly along key transport corridors. Members felt that within Ashford the root causes of such stationary traffic were twofold – excessive numbers of vehicles utilising the road network, and

obstacles to the free flow of traffic such as poorly co-ordinated traffic signals and speed reduction measures. In circumstances where stationary traffic was unavoidable, Members felt that the use of signage to encourage drivers to switch off their engines instead of idling could be beneficial.

48. Members noted that the completion of junction 10a of the M20 would alleviate traffic pressure at the existing junction 10, but felt that approaches should be made to Kent County Council (KCC) with regard to traffic signal optimisation and the consideration of air quality impacts when designing schemes of traffic calming measures within the Borough.

Recommendation 7:

The Council engage with Kent County Council over the potential of Urban Traffic Management Control (UTMC) to optimise traffic flow within Ashford.

Recommendation 8:

The Council request that Kent County Council seek to avoid negative impacts on air quality when designing speed reduction measures within the borough.

49. Members noted and supported the Cabinet's decision of 11 May 2017 (minute 407/5/17 refers) not to levy any additional charges on electric vehicle charging point users for the electricity consumed. Members felt that there could be validity in removing or reducing parking charges for electric vehicles to encourage their use.

⁶<https://www.gov.uk/government/collections/government-grants-for-low-emission-vehicles#electric-vehicle-homecharge-scheme>

Recommendation 9:

That the Council consider reducing or removing parking charges for electric vehicles within its car parks to encourage use of these vehicles.

**Transport
Commercial Vehicles**

50. As noted in paragraphs 28 and 29, the imposition of more stringent Euro emission standards on diesel passenger vehicles has not delivered expected reductions in NO_x emissions from these vehicles. By comparison, higher Euro emissions standards for commercial vehicles (a market segment dominated by diesel) have largely been complied with.

51. The International Council on Clean Transportation (ICCT) has shown that there are no systematic exceedances of NO_x limits from diesel commercial vehicles, despite there being no significant difference in the chemical makeup of diesel and petrol exhaust fumes.

52. Comparative testing of the NO_x emissions of light and heavy duty diesel vehicles carried out by ICCT found that despite burning more fuel per kilometre travelled, average NO_x emissions of HGVs and buses were less than half that of Euro 6 standard diesel passenger vehicles. From these findings, ICCT calculated that diesel cars produce 10 times more NO_x than buses or HGVs per litre of fuel consumed.

53. Members noted the commitments of funding made by the Department for Transport (DfT) and OLEV with regard to electric and hybrid freight

vehicle trials, and it was felt that there was validity in providing electrical connections within overnight lorry parking facilities to both serve future electric HGV demand and provide an alternative to diesel generators for powering refrigeration units whilst stopped. Utilising electricity, rather than diesel, to power refrigeration in trailers can deliver a significant cost reduction as well as reducing vehicle emissions.⁷

Recommendation 10:

New HGV parking facilities within the Borough should consider the provision of infrastructure to cater for electric HGV charging and refrigeration.

**Transport
Buses**

54. Ashford has benefitted from a strong working relationship between the Council, public transport operators and KCC for several years through the Quality Bus Partnership (QBP); and the joint working undertaken by this group has delivered significant enhancements to the bus network in Ashford.

55. The Task Group felt that the 'Little & Often' bus service, operated by Stagecoach using Euro VI standard vehicles, was a notable credit to the Borough's public transport offer and demonstrated the potential for improving air quality on the public transport network of the Borough. The service offers a much improved frequency for residents whilst reducing public transport emissions along key routes through Ashford.

56. It was noted that although Ashford Borough Council did not tender for

⁷ https://thesis.eur.nl/pub/30829/BA-Scriptie-Jurgen-Baartman_finaal.pdf

bus contracts (being the responsibility of KCC), it could exert a certain degree of influence through its membership of the QBP. This agreement was refreshed in 2016 to include an increased focus on higher emissions standards for buses operating within Ashford.

Recommendation 11:

Through its membership of the Ashford Quality Bus Partnership, the Council should endeavour for bus services within the Borough to operate using vehicles at Euro IV emission standard or higher.

57. Members noted that the level of town centre development ongoing would increase the number of vehicle trips to the town centre and could potentially lead to a worsening of air quality along major routes through the town.

58. The Council has previously signalled an aim to achieve a modal shift away from car use to public transport, with the 2006 Parking Strategy and 2008 Transport Strategies setting out an equivalent 15 percent reduction in the modal share of the car between 2003 and 2031, with a three-fold increase in the modal share of buses over the same period.

59. Policy TRA4 of the draft Local Plan to 2030 states that the Council will ‘...in liaison with the County Council...seek enhancements to the local bus network in order to meet the additional demands created by new development as it comes forward. These enhancements could include the delivery of bus priority measures, the provision of a new service or the alteration/expansion of an existing service, contributions towards bus-related infrastructure and operational subsidy’. Members welcomed this policy and felt that increased patronage of low emission bus

services was of paramount importance to improving air quality in Ashford.

Recommendation 12:

Developer monies gathered under policy TRA4 of the (draft) Local Plan to 2030 should be used to fund enhancements to the local bus network which will encourage a modal shift from use of the private car to public transport.

Transport

Taxi and Private Hire Vehicles

60. Members noted that from the 1st of January 2018 TfL will mandate that all new London cabs have a ‘zero-emission capable’ range of at least 30 miles. Whilst the lack of a declared Air Quality Management Area (AQMA) precludes the Council from introducing clean air zones or similar measures to mandate an improvement in emissions standards for vehicles, Members felt that the Council should encourage the uptake of electric and plug-in hybrid vehicles by the taxi and private hire trade in the Borough, highlighting grant funding schemes as appropriate.

Recommendation 13:

That the Council, through appropriate channels, encourage the uptake of electric and hybrid vehicles within the taxi and private hire fleets within the Borough.

61. It was noted that the NICE guidelines included considerations around fuel-efficient driver training for Council staff to extend vehicle life while reducing vehicle emissions and fuel/service costs. This is dealt with in regard to the Council’s fleet in paragraph 75 below, however Members also felt that such training could be beneficial to the taxi and private hire trade in the Borough.

Recommendation 14:

The Council consider subsidising a programme of fuel-efficient driver training for taxi and private hire drivers.

**Transport
Rail Services**

62. The air quality impacts of rail travel are relatively low and Members noted that, as the Council provided a thorough response to the South Eastern Rail Franchise consultation in May 2017, an in-depth examination of options for improving air quality in regard to rail travel would duplicate work undertaken by the Council in compiling its submission.
63. This response noted that the Council “would support the removal of diesel trains from the network where possible, and the promotion of a shift to the use of more sustainable low emission trains, which would improve the air quality within the Borough and across the south east network.” The Task Group supported this position and did not feel that further recommendations in relation to rail services would be beneficial.

**Transport
Cycling**

64. Members considered a presentation from the Council’s Cultural Services team on the development of a cycling strategy for the Borough covering the period 2017 to 2022. It was noted that the previous borough strategy (2011 to 2016) had been successful in delivering improvements to cycling routes in the Borough, and as a result of previous work the Council had a good reputation among partner organisations.

65. The new cycling strategy would seek to further enhance the cycling network within the Borough, leading to improved opportunities for cycling in key rural locations and a more active cycling community. Members were pleased to note the approach that the cycling strategy would take and felt that it had the potential to effect an increased modal shift toward cycling.
66. The Task Group noted that employers should encourage staff to choose sustainable transport options, including cycling to work where possible. It was recognised that for cycling to be an attractive commuting prospect, it was key that employers provided adequate facilities such as on-site showers and secure cycle storage.

Recommendation 15:

That new commercial developments include adequate provision for facilities to enable and support cycling to work by staff.

67. It was reported to the Task Group that 125,000 bicycle journeys were made to Ashford International each year, and Members noted that cycle storage facilities at the station (despite recent expansion) were oversubscribed and a lack of spaces could dissuade people from cycling and increase car use. Members felt that there was a need to expand cycle storage in key locations across the town, not just at the station, to meet existing and future demand.
68. It was felt that the evidence provided by the Cultural Services team showed a significant level of support for cycling in the Borough and that this should be capitalised upon both as a means to improve air quality and general public health. Members

expressed support for a Dutch model for cycling – where cycling was seen as a viable commuting option, rather than focusing on speed or physicality. The Task group noted the evidence of the Cultural Projects Manager and Sports and Activity Project Officer that the provision of higher quality facilities were more likely to increase the uptake of cycling.

Recommendation 16:

An audit of cycling facilities should be undertaken as part of the preparation of the new Borough Cycling Strategy, with additional storage facilities installed where demand for cycle storage exceeds or is likely to exceed supply.

**Transport
Schools**

69. Members felt that the Council's support of walk to school schemes such as those facilitated by the KM Charity Group should be continued. Such schemes have proven highly successful at increasing the numbers of children walking to school and reducing vehicle movements around schools, with a reduction of 260,000 vehicle trips across the county achieved in the 2016/17 academic year.

Recommendation 17:

The Council continues its support for walk-to-school schemes in the Borough.

70. The lack of a declared AQMA within the Borough precludes the Council from seeking enforcement powers to tackle vehicle idling (such as that seen outside schools), however the Task group felt that there could be validity in recommending to Kent Police that guidance issued to drivers at schools by PCSOs as part of Operation OPEYE (where PCSOs

attend schools at the start and end of the day to issue advice on unsafe and unsuitable parking practices) could include information on vehicle idling.

Recommendation 18:

Kent Police be asked to dissuade vehicle idling outside schools as part of Operation OPEYE.

**Council Operations
Fleet**

71. The Council's adopted Energy Efficiency Strategy 2017-2022 includes a pledge to increase the prevalence of ultra-low and zero emission vehicles in its fleet operations where possible. The Task Group noted in addition to the Council's fleet vehicles (which include a fully electric pool car and 'e-bikes' used by the Council's Civil Enforcement Officers (CEOs), there is a significant use of 'grey fleet' - where employees' own vehicles are used for business travel with the Council paying a mileage contribution to staff.

72. The Council also designates essential car users among staff who may either enter into a lease car scheme or take up a cash alternative. However, the Council does not currently set limits on eligible cars related to fuel efficiency when paying mileage claims, place limits on eligible lease cars or provide incentives for staff to choose ultra-low or zero emission vehicles.

73. The Task Group felt that the Council should do more to encourage the use of ultra-low and zero emission vehicles among staff to drive for an emissions reduction across both its owned and 'grey' fleet.

74. It was noted that the Council's CEOs regularly used bicycles and e-bikes for patrols in Ashford, and suggested that other staff conducting visits within cycling distance of the Council offices could be encouraged to undertake short journeys by bicycle through the payment of a mileage claim similar to that paid for car travel.

Recommendation 19:

The Council should review its lease car and mileage claim schemes to exclude high polluting vehicles from eligibility and promote ultra-low and zero emission vehicles.

Recommendation 20:

The Council remove parking permit charges for staff with ultra-low and zero emission vehicles.

Recommendation 21:

The Council explore the feasibility of staff cycling to site or home visits within Ashford as an alternative to car use.

75. As discussed in paragraph 53 above, the NICE guidelines recommend the introduction of fuel-efficient driver training for staff, targeted on changing behaviours (such as rapid acceleration and braking, incorrect gear selection and engine idling) that contribute to increased vehicle emissions. Members felt that such training could be beneficial for the Council, and could potentially generate savings for the Council through reduced fuel bills and service requirements on fleet vehicles.

Recommendation 22:

The Council operate a programme of fuel-efficient driver training for all designated essential car users who are required to drive Council fleet vehicles for their respective roles.

Council Operations Travel Planning

76. It was reported to the Task Group that the Council does not currently have a workplace travel plan in place for staff, and does not operate schemes such as a car share; and Members felt that this was an area where a worthwhile difference could be made with the potential to reduce pollutants in the Borough associated with staff travel.

77. The Council's operated cycle to work scheme was noted as a positive initiative and one which members supported, however it was felt that the provision of changing and shower facilities for staff without a Stour Centre membership may drive further uptake of cycling among staff.

Recommendation 23:

The Council should compile a comprehensive workplace travel plan which identifies means to improve the percentage of staff utilising sustainable means to travel to work.

Recommendation 24:

The Council continue to offer a cycle to work scheme (or similar) and explore options for staff shower and changing facilities within the Civic Centre.

Council Operations Funding

78. Members noted that significant pots of grant funding from both the UK Government and the European Union were regularly being made available for low and zero emission transport schemes and other sustainable transport projects. Discussed funding schemes included the Air Quality Grant Programme, which issued grants annually to local authority

projects focused on tackling excessive levels of NO₂; the Workplace Charging Scheme, which contributed funds towards the installation of electric vehicle charging points for eligible businesses, charities and public sector organisations; and the Plug-In Van Grant, which provides grants to encourage the procurement of plug-in commercial fleet vehicles.

79. It was noted that the current network of electric vehicle charging points was installed as a result of a successful county-wide funding bid. Members were concerned that the relative lack of air quality issues in the Borough could be a hindrance to bids to external funding, and as such it was felt that joint funding bids with other boroughs or Kent County Council should be considered.

Recommendation 25:

The Council should pursue grant funding related to air quality improvement, sustainable transport and associated infrastructure where feasible, including working with partners to submit joint bids as appropriate.

Council Operations Sustainability

80. In 2010 the Council agreed its Carbon Management Plan, designed to achieve an ambitious 30% reduction in the Council's carbon dioxide equivalent (CO_{2e}) emissions from its estate and operations to 2016. The actions taken under the Carbon Management Plan, whilst not delivering the intended target, did result in a 23.7% reduction in the Council's CO_{2e} output, equivalent to over 1,000 tonnes of CO_{2e}.

81. From a baseline set in 2009, the Council reports annually on the level

of greenhouse gas emissions arising from its estate and operations. The baseline for Greenhouse Gas reporting will be reset for the 2018/19 reporting year to account for changes in the Council's property portfolio and operations, including the current waste contract and emissions from Aspire, the Council's in-house grounds maintenance service.

82. In October 2017, the Department for Business, Energy and Industrial Strategy (BEIS) released '*The Clean Growth Strategy: Leading the way to a low carbon future*', which set clean growth at the heart of the Government's Industrial Strategy, including setting out investment to deliver clean growth and meet the agreed Carbon Budgets – progressive five year caps on greenhouse gas emissions – up to 2050. The Clean Growth Strategy also proposes a voluntary public sector carbon emissions reduction target of 30% by 2020-21.

83. Investment measures outlined within the Clean Growth Strategy include:

- a £20m commitment to support a new clean technology early stage investment fund;
- investment of up to £100m in carbon capture usage and storage;
- £1bn to support the take-up of ultra-low emission vehicles (ULEV);
- £95m to support charging infrastructure deployment;
- £50m for the Plug-in Taxi programme to offer discounts of up to £7,500 on new ULEV taxis;
- £14m to deliver dedicated ULEV taxi charging points;
- £100m for retrofitting and new low emission buses;

- £1.2bn for promotion of walking and cycling.

84. The Task Group felt that there was a need for a designated officer to lead on strategic co-ordination of actions under the Air Quality and Energy Efficiency Strategies, and to reconcile these actions with the Council's wider policy framework.

85. This officer could also have responsibility for researching and bidding for grant funds related to air quality and sustainability such as those outlined in paragraphs 78 and 83, and it was felt that this could deliver significant value to the organisation (and potentially off-set any salary considerations) through the post holder securing grant funding and delivering savings to the Council through the actions of the Air Quality and Energy Efficiency Strategies.

Recommendation 26:

The Council consider the appointment of an officer to lead on Sustainability; research and apply for appropriate grant funding; and deliver on the aims of the Energy Efficiency Strategy and any actions adopted from this report for inclusion in the Air Quality Strategy.

**Council Operations
Public Information**

86. Members felt that more information should be made available for residents on air quality and transport options to promote the aims of the adopted strategy and resident use of sustainable transport. It was noted that a single web page capturing the strategy aims and information on cycling, bus travel, electric vehicle charging, driving habits and reporting the UK Daily Air Quality Index (DAQI).

Recommendation 27:

The Council's website should include a page tailored toward air quality information which outlines the aims of the strategy as well as including potential air quality improvement actions, information on sustainable transport options and DAQI reports.

87. Kent County Council maintain a number of Variable Message Signs (VMS) on key transport corridors into Ashford. Members felt that these signs could be used to display air quality improvement messages (for example, advising drivers to turn off their engines when stopped).

Recommendation 28:

The Council should work with KCC to use VMS in Ashford to promote air quality information for drivers.

88. NICE recommend working with healthcare professionals to raise awareness of poor outdoor air quality and advise high risk groups on how to minimise their exposure. The Council has strong working relationships with health partners in the Borough through its membership of and work with the Ashford Health and Wellbeing Board (AHWB), and Members felt that this would be the most appropriate group to undertake work on raising the awareness of air quality impacts.

Recommendation 29:

The Council should work with its partners through the Ashford Health and Wellbeing Board to raise awareness of poor outdoor air quality and provide advice to high risk groups.

Conclusion

89. The Air Quality Task Group felt that the issue of air quality within the Borough should be the subject of greater attention and focus from the Council, particularly in light of the mortality burdens associated with particulate air pollution. Whilst the Borough does not have any declared Air Quality Management Areas within its limits, the Task Group felt strongly that this should not preclude the authority from taking action to improve air quality within the Borough.
90. The Council has a strong track record of promoting sustainability through its procurement processes, adoption of the Energy Efficiency Strategy and setting ambitious targets for reducing carbon dioxide emissions from its premises and operations.
91. The actions and information within this report do not provide an exhaustive approach to air quality and the adoption of this document as an Air Quality Strategy for the Borough should not preclude the Council from pursuing actions and opportunities not contained within this report that will serve to safeguard and improve air quality in the Borough.
92. The pace of change with regard to vehicle technology, and the increased focus on air quality within Central Government means that issues of air quality are likely to evolve and as such this report and the subsequent Air Quality Strategy should be viewed as a living document. Once adopted as policy, it is recommended that this strategy is revisited annually, or sooner in response to developments in Government policy and/or external pressures.
93. It is hoped that through adoption of the recommendations within this report the Council can deliver a real commitment to improving air quality in the Borough in developing a strategy which will complement the existing policy framework of the Council and set ambitious goals for air quality improvement and pollutant reduction.

Air Quality Task Group – Summary of Recommendations

Recommendations regarding partnership working and the continuation of existing practices.

No.	Recommendation
6	The Council work with Kent County Council to explore options for providing on-street vehicle charging infrastructure to meet resident demand, including promoting relevant OLEV grant schemes and other trials.
7	The Council engage with Kent County Council over the potential of Urban Traffic Management Control (UTMC) to optimise traffic flow within Ashford.
8	The Council request that Kent County Council seek to avoid negative impacts on air quality when designing speed reduction measures within the borough.
11	Through its membership of the Ashford Quality Bus Partnership, the Council should endeavour for bus services within the Borough to operate using vehicles at Euro IV emission standard or higher.
13	That the Council, through appropriate channels, encourage the uptake of electric and hybrid vehicles within the taxi and private hire fleets within the Borough.
17	The Council continues its support for walk-to-school schemes in the Borough.
18	Kent Police be asked to dissuade vehicle idling outside schools as part of Operation OPEYE.
24	The Council continue to offer a cycle to work scheme (or similar) and explore options for staff shower and changing facilities within the Civic Centre.
28	The Council should work with KCC to use VMS in Ashford to promote air quality information for drivers.
29	The Council should work with its partners through the Ashford Health and Wellbeing Board to raise awareness of poor outdoor air quality and provide advice to high risk groups.

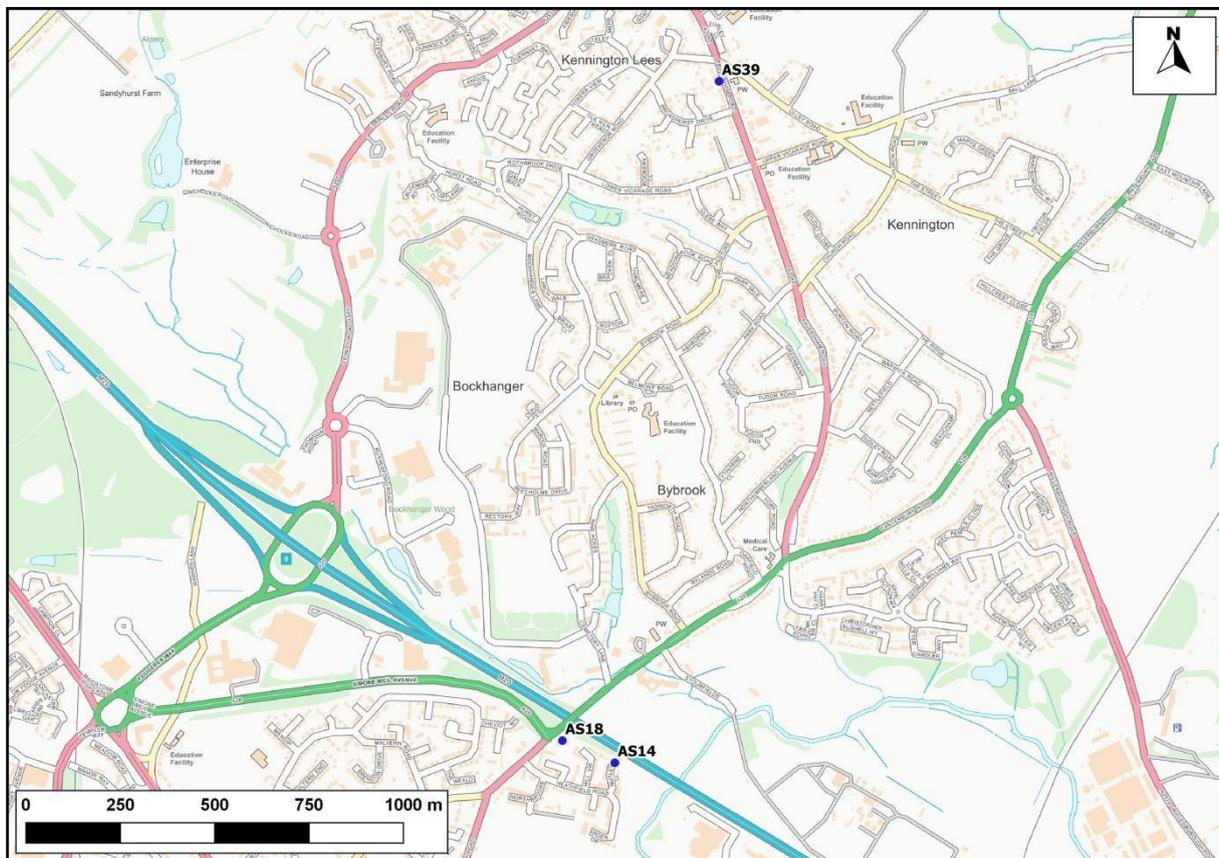
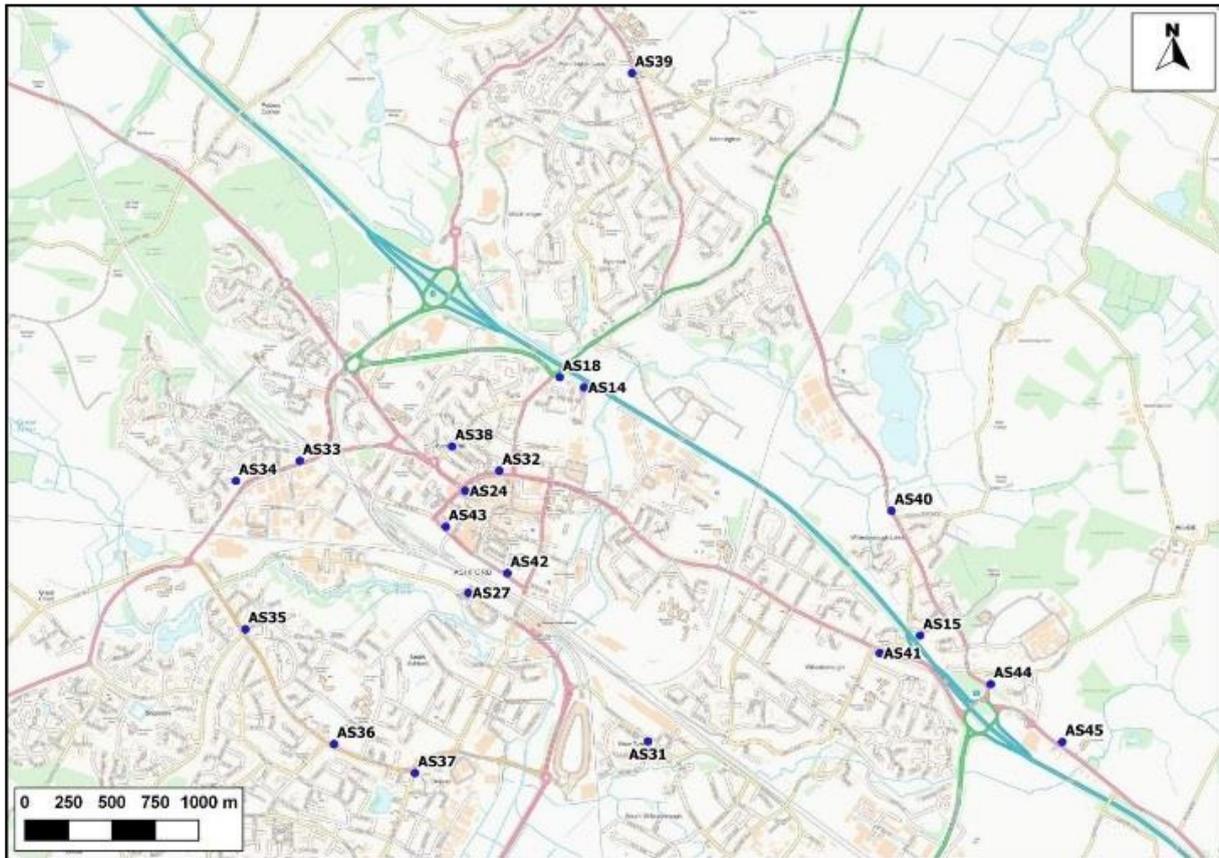
Full list of recommendations

No.	Recommendation
1	The recommendations and evidence base contained within this report form an Air Quality Strategy for the Council.
2	If a CIL regime is adopted by the Council for new developments, contributions should be set aside for air pollution mitigation measures.
3	The Council adopt the points noted in table 2 on page 9 of the report as best practice guidance for reducing air pollution in new developments.
4	The Council should adopt, and require developers to abide by, planting strategies which will support pollutant mitigation and effective street ventilation.
5	The Council should expand the network of electric vehicle charging points within the borough, utilising S106 and government grant funding as appropriate.
6	The Council work with Kent County Council to explore options for providing on-street vehicle charging infrastructure to meet resident demand, including promoting relevant OLEV grant schemes and other trials.
7	The Council engage with Kent County Council over the potential of Urban Traffic Management Control (UTMC) to optimise traffic flow within Ashford.
8	The Council request that Kent County Council seek to avoid negative impacts on air quality when designing speed reduction measures within the borough.
9	That the Council consider reducing or removing parking charges for electric vehicles within its car parks to encourage use of these vehicles.

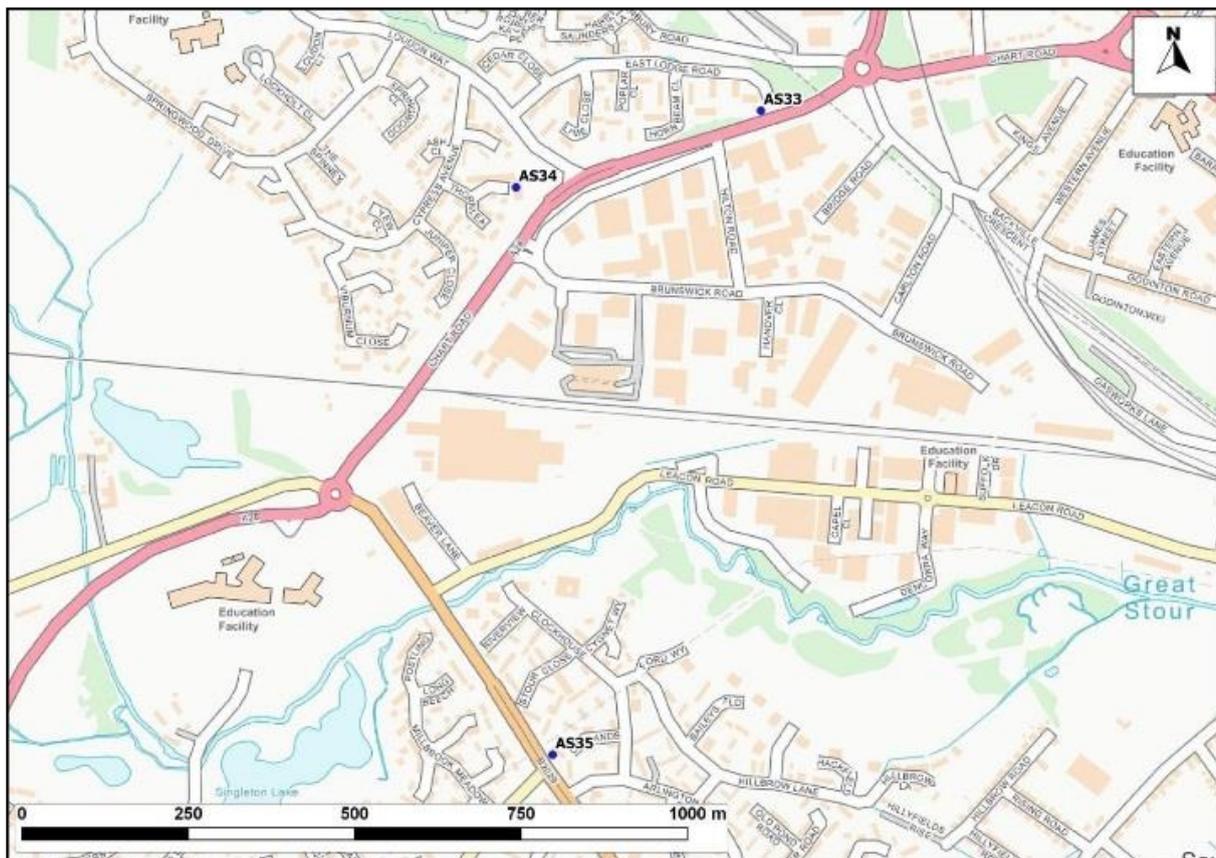
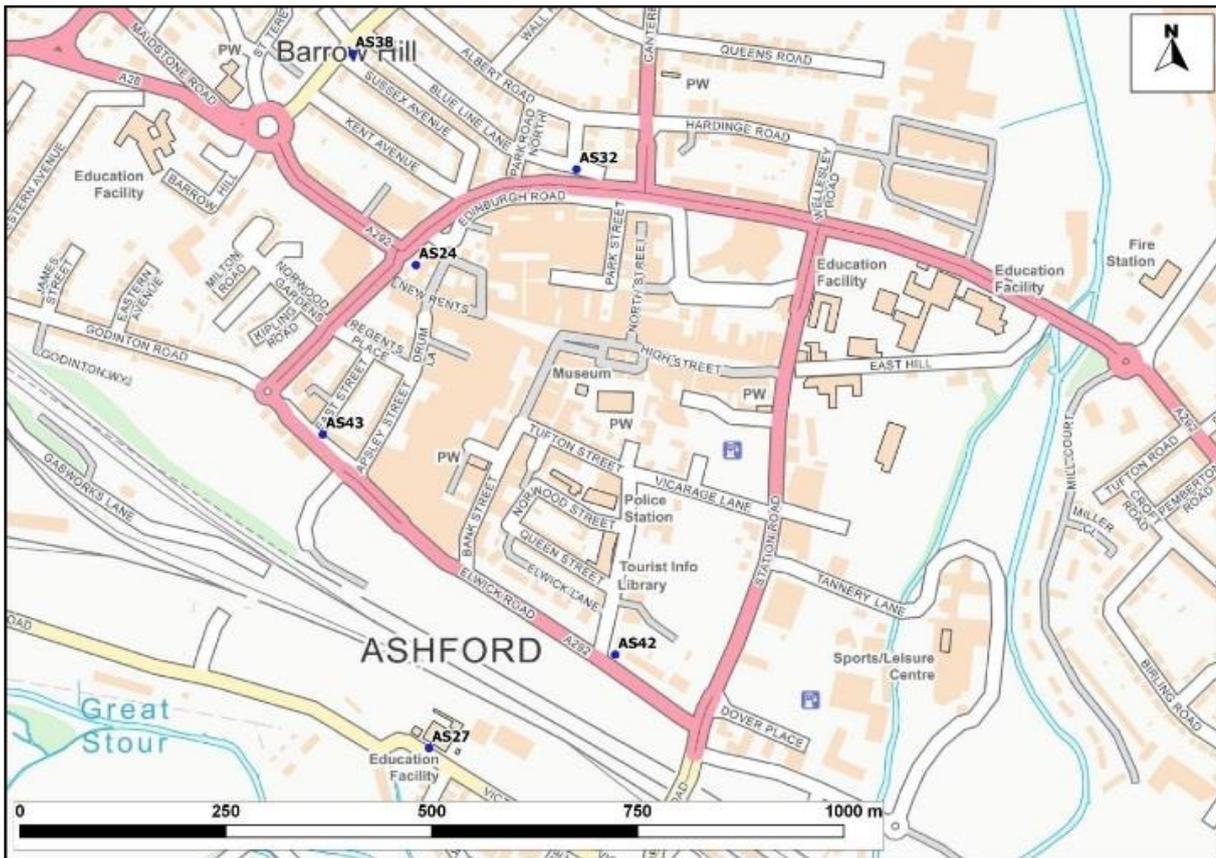
Appendix A – Summary of Recommendations

10	New HGV parking facilities within the Borough should consider provide infrastructure cater for electric HGV charging and refrigeration.
11	Through its membership of the Ashford Quality Bus Partnership, the Council should endeavour for bus services within the Borough to operate using vehicles at Euro IV emission standard or higher.
12	Developer monies gathered under policy TRA4 of the (draft) Local Plan to 2030 should be used to fund enhancements to the local bus network which will encourage a modal shift from use of the private car to public transport.
13	That the Council, through appropriate channels, encourage the uptake of electric and hybrid vehicles within the taxi and private hire fleets within the Borough.
14	The Council consider subsidising a programme of fuel-efficient driver training for taxi and private hire drivers.
15	That new commercial developments include adequate provision for facilities to enable and support cycling to work by staff.
16	An audit of cycling facilities should be undertaken as part of the preparation of the new Borough Cycling Strategy, with additional storage facilities installed where demand for cycle storage exceeds or is likely to exceed supply.
17	The Council continues its support for walk-to-school schemes in the Borough.
18	Kent Police be asked to dissuade vehicle idling outside schools as part of Operation OPEYE.
19	The Council should review its lease car and mileage claim schemes to exclude high polluting vehicles from eligibility and promote ultra-low and zero emission vehicles.
20	The Council remove parking permit charges for staff with ultra-low and zero emission vehicles.
21	The Council explore the feasibility of staff cycling to site or home visits within Ashford as an alternative to car use.
22	The Council operate a programme of fuel-efficient driver training for all designated essential car users who are required to drive Council fleet vehicles for their respective roles.
23	The Council should compile a comprehensive workplace travel plan which identifies means to improve the percentage of staff utilising sustainable means to travel to work.
24	The Council continue to offer a cycle to work scheme (or similar) and explore options for staff shower and changing facilities within the Civic Centre.
25	The Council should pursue grant funding related to air quality improvement, sustainable transport and associated infrastructure where feasible, including working with partners to submit joint bids as appropriate.
26	The Council consider the appointment of an officer to lead on Sustainability; research and apply for appropriate grant funding; and deliver on the aims of the Energy Efficiency Strategy and any actions adopted from this report for inclusion in the Air Quality Strategy.
27	The Council's website should include a page tailored toward air quality information which outlines the aims of the strategy as well as including potential air quality improvement actions, information on sustainable transport options and DAQI reports.
28	The Council should work with KCC to use VMS in Ashford to promote air quality information for drivers.
29	The Council should work with its partners through the Ashford Health and Wellbeing Board to raise awareness of poor outdoor air quality and provide advice to high risk groups.

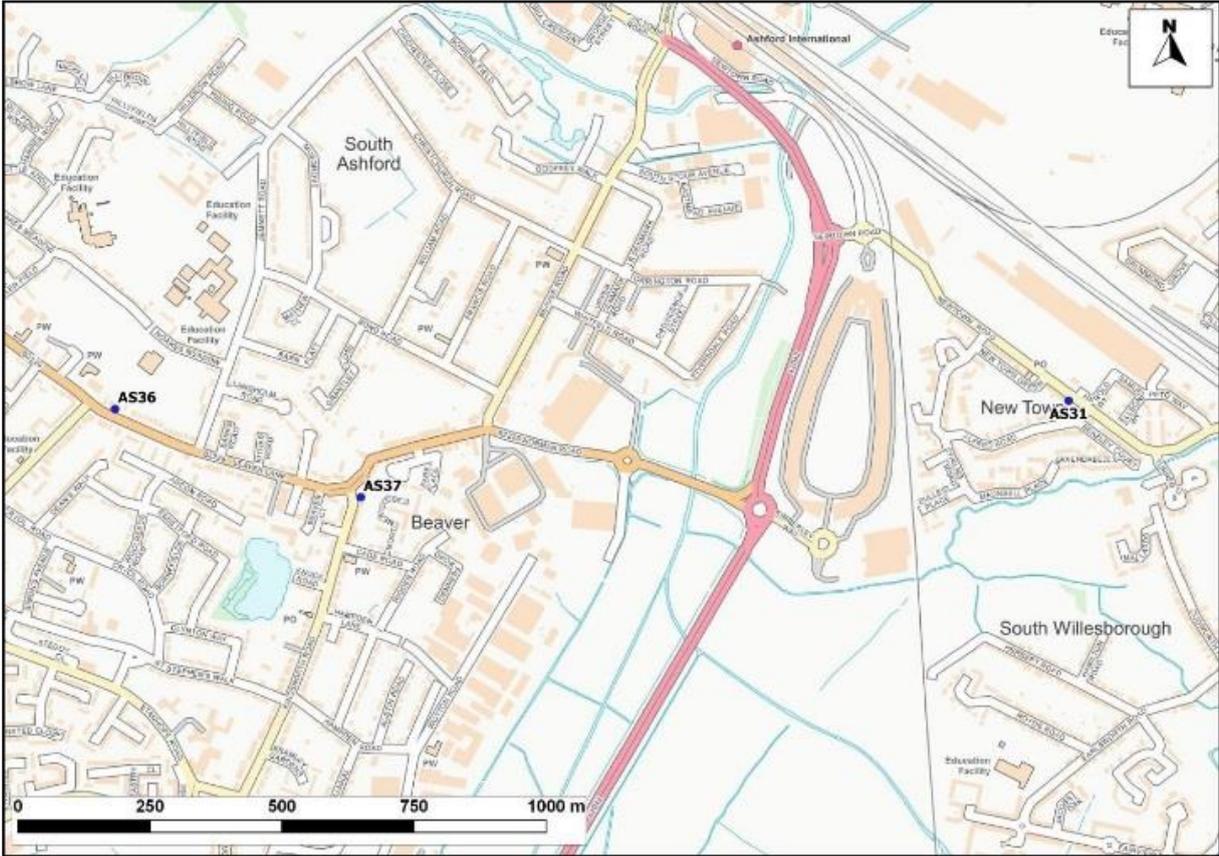
Appendix B – Maps of Air Quality Monitoring Locations



Appendix B – Maps of Air Quality Monitoring Locations



Appendix B – Maps of Air Quality Monitoring Locations



Policy ENV10 - Renewable and Low Carbon Energy

Planning permission for proposals to generate energy from renewable and low carbon sources will be permitted provided that:

- a. **The development, either individually or cumulatively does not result in significant adverse impacts on the landscape, natural assets or historic assets (including their setting);**
- b. **The scale and design of renewable energy provision is compatible with the character and appearance of the area, having special regard to nationally recognised designations and their setting, such as AONBs, Conservation Areas and Listed Buildings.**
- c. **The development does not generate an unacceptable level of traffic or loss of amenity to nearby residents (visual impact, noise, disturbance, shadow flicker, odour).**
- d. **Provision is made for the decommissioning of the infrastructure once operation has ceased, including the restoration of the site to its previous use;**
- e. **Evidence is provided to demonstrate effective engagement with the local community and local authority.**

A Sustainability Assessment should be submitted alongside any planning application illustrating the social, environmental and economic benefits of the proposal against this criterion and any mitigation measures necessary.

Policy ENV11 - Sustainable Design and Construction - Non-residential

All major non-residential development will achieve BREEAM 'Very Good' standard, with at least a 40% improvement in water consumption against the baseline performance of the building (Wat1, 3 credits), unless demonstrated not to be practicable.

Policy ENV12 - Air Quality

All major development proposals should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality. Development should be located where it is accessible to support the use of public transport, walking and cycling.

Development proposals that might lead to a significant deterioration in air quality or national air quality objectives being exceeded, either by itself, or in combination with other committed development, will require the submission of an Air Quality Assessment to be carried out in accordance with the relevant guidance. This should address:-

- a. The cumulative effect of further emissions;**
- b. The proposed measures of mitigation through good design and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration.**

Proposals which will result in National Air Quality Objectives being exceeded will not be permitted.