

KENT AND MEDWAY ENERGY AND LOW EMISSIONS STRATEGY

Public Consultation Report – DRAFT FOR ETCC

October 2019



Sustainable Business and Communities Team, Kent County Council
www.kent.gov.uk/environmentstrategy

EXECUTIVE SUMMARY

In response to the ambitious levels of growth planned for the county and considering the growing environmental risks posed by air pollution and climate change, Kent and Medway Chief Executives and Leaders endorsed the need for a dedicated *Kent and Medway Energy and Low Emissions Strategy* in November 2017. The development of the strategy, which sits within the framework of the Kent Environment Strategy, has been led by Kent County Council in close association with Medway Council, Kent district and borough councils and other key partners.

Following a year of evidence gathering and dedicated cross-sector engagement and informal consultation, the draft strategy was open for public consultation between 2 July and 23 September 2019. The consultation was promoted through press releases and social media, targeted emails and promotion at meetings, events and in public buildings. The consultation documents were available online at www.kent.gov.uk/energyandlowemissionsconsultation.

A total of 365 responses were received; 288 from people responding in an individual capacity, 18 responding in a professional capacity, and 57 responding on behalf of public, private and voluntary organisations; including 10 local authorities.

Most respondents agreed (either “strongly agree” or “tend to agree”), with the draft strategy’s vision and the priorities identified for each theme; with agreement ranging from 64% to 75% of respondents. Between 73% and 83% of respondents also agreed with the challenges identified in the draft strategy. A range is shown to account for a number of questions.

In total, 1,518 individual comments were received, providing a wealth of information and constructive suggestions that will be integrated into the final strategy, evidence base and implementation plan.

Whilst many of the comments were positive about the creation of a dedicated energy and low emissions strategy, there was one clear and consistent message in the feedback:

- **The strategy is not ambitious enough and the speed of action must be quicker.** This was by far the strongest and most frequently mentioned concern raised by all respondent types and age groups. There was a fear that the 2050 target was too far in the future to be meaningful; that action would be delayed or abandoned until a future date; and that the vision did not reflect the urgency of the council’s climate emergency declarations.

Other common concerns were:

- **There’s a lack of detail on what and how actions will be implemented and monitored.** Many respondents wanted to know specific details, including who would be responsible, how it will be funded and timescales. It should be noted that much of this detail will be set out in the implementation plan, which will be published alongside the final strategy.
- **There’s too much emphasis on electric cars and not enough focus on alternatives to the car.** Whilst there was widespread support for accelerating the transition to electric vehicles of all types (including buses and lorries), many respondents were disappointed by the lack of actions to support modal shift away from private vehicles. Many wanted to see greater investment in public transport, walking and cycling infrastructure, with some calling

for strong disincentives to private vehicle usage to tackle congestion and poor air quality hot spots.

- **The strategy should acknowledge the role of green infrastructure.** Many felt that the strategy needed to include the importance of green infrastructure in balancing (offsetting) carbon dioxide emissions and the additional benefits that it also provides for nature, air quality, economy and health. Respondents highlighting this concern called for the strategy to include actions to increase tree coverage and wetland restoration, improve soil and land use and other activities to increase natural carbon sequestration.
- **There's a potential conflict between this strategy's vision and other council policies.** This concern primarily related to transport and planning policies, with many respondents feeling that the strategy would be undermined by council decisions being made on road schemes; the location of, and infrastructure provided in new developments; and policies on subsidised public transport.
- **Continued growth is not compatible with a net-zero ambition.** There was concern that the vision could not be achieved whilst there was continued growth in the county, with many stating that the strategy should challenge the scale of planned growth.
- **Achieving the vision will not be possible without changes to national policy or significant government funding.** Many respondents noted that some of the actions necessary to achieve net-zero emissions were outside the scope of local government, such as changes to government policy, practices of public transport providers and utilities, or the ability to offer financial incentives to residents and businesses at the scale required. Respondents also highlighted the need for significant government funding to enable councils to transform buildings, services and infrastructure.
- **The strategy should seek to reduce the total carbon footprint of residents and businesses in Kent and Medway.** Some respondents called for the strategy to tackle greenhouse gas emissions from all sectors; including aviation, shipping and imported goods and services.

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1. Introduction

This document provides a summary of the comments received through the public consultation on the draft Kent and Medway Energy and Low Emissions Strategy and provides recommendations on how these comments should be addressed in the final strategy.

In November 2017, Kent and Medway Chief Executives and Leaders recognised the significant environmental risk posed by air pollution and the need for a step change in our approach to reducing greenhouse gas emissions. At the same time, they acknowledged the ambitious levels of growth planned for the county and the need to identify and deliver a more sustainable approach to energy generation.

In response to these growing challenges, they endorsed the need for a *Kent and Medway Energy and Low Emissions Strategy*, sitting within the framework of the Kent Environment Strategy. They agreed that Kent County Council would take the lead in co-ordinating its development, working collectively with Medway Council, Kent district and borough councils and other key partners.

The draft strategy describes how councils in Kent and Medway and their partners propose to reduce emissions to net-zero, tackle fuel poverty and poor air quality, and ensure the county benefits from a competitive, innovative and resilient low carbon economy. The strategy supports and builds on the Kent Environment Strategy and draws on the priorities and actions set out in the government's Clean Air Strategy, Industrial Strategy and Clean Growth Strategy. It also makes links to existing local strategies and policies, including district and borough council Air Quality Management Area Strategies and Local Plans.

2. Consultation process

The public consultation of the draft Kent and Medway Energy and Low Emission Strategy ran from 2 July to 23 September 2019. The consultation provided the opportunity for members of the public and stakeholder organisations to provide their views on the draft strategy and the ambition and priorities outlined within it.

The draft strategy, evidence base, equalities impact assessment and consultation questionnaire were available online at www.kent.gov.uk/energyandlowemissionsconsultation and in hard copy on request. The promotional postcard and poster were also available on the consultation webpage, along with a simplified 'bite-size' version of the strategy, which was added to the webpage in September.

The consultation was promoted in the following ways:

- Email to district, borough and unitary councils and other key public sector partnerships involved in the initial development of the draft strategy.
- Email to key stakeholder groups inviting them to take part and asking them to promote the consultation through their networks. These included Board of Invicta Chamber of Commerce, Kent Nature Partnership, Kent Environment Strategy Steering Group, Kent Environment Champions Group, Kent Housing Group, Kent Planning Policy Forum, all Kent colleges and universities and all Kent Citizen Advice Bureaus.
- Email to all relevant equality and diversity groups and charities in Kent.
- Emails to KCC apprentices and graduates, KCC area education officers, staff in youth services and youth service organisations and council staff groups.
- Entry on KCC consultation database and email invite to all those registered on the site.
- Promoted to council staff through intranet and email newsletter.
- Articles on the KELSI website for education professionals in Kent.
- Attendance at Kent Youth County Council.
- Social media – tweets from Explore Kent, Kent Environment Strategy, Kent Connected and KCC Corporate twitter feeds.
- Social media – promotional targeted Facebook adverts by Explore Kent.
- Social media – direct messaging to Kent-based followers, direct tweeting the key groups such as University of Kent's Sustainability Society.
- Promotional post from Low Carbon Kent (LoCASE) on LinkedIn, and an email was sent to all Low Carbon Kent and LoCASE grant recipients.
- Attendance and promotion to visitors at the KCC stand at the Kent County Show.
- Attendance and promotion to businesses attending an Environmental Awareness Open Day in Rainham, at a University of Kent Sustainability event, and at a Higham Library Community Event.
- Presentation and promotion at EU PASSAGE Project air quality seminar and subsequent email to all attendees.
- Attendance and promotion at scheduled partnership meetings.
- Article published on the Interreg Europe website.
- News post promoting the consultation on the Kent Housing Group website, Medway Council's website and Sevenoaks District Council's website.
- Promotional blog post on South Ashford's Community Forum website.

- Article published in Kent Association of Local Councils' newsletter.
- Posters and postcards displayed in all Kent libraries, gateways and main country parks.
- Briefing to KCC Members.
- Press releases.
- Promotion to Global Climate Strikers outside County Hall.

The draft Kent and Medway Energy and Low Emissions Strategy was downloaded 1,370 times from the consultation webpage (1,242 downloads for PDF and 128 downloads of the Word version). The evidence base was downloaded 421 times, (339 PDF downloads, 82 Word version downloads).

KCC undertook the following steps to ensure the consultation was accessible to all:

- All consultation documents and the questionnaire were available to view and respond to online.
- Hard copies of the documents and alternative formats and languages were available on request and all promotional materials included details on how these could be requested. We received 1 request for a hard copy of the evidence base during the consultation and no requests for alternative formats or languages.
- Microsoft Word versions of the strategy, evidence base and Equalities Impact Assessment (EQIA) were available online to ensure accessibility for people using audio transcription software.
- Following requests for a "young person friendly" version, a shorter 'bite size' version was made available in September.

3. Respondents

3.1 Who responded

The public consultation received 365 responses, of which 288 were from people responding in an individual capacity, 18 were responding in a professional capacity, and 57 were responding on behalf of organisations (Table 1). A list of the organisations that responded can be found in [Appendix 1](#). There were 377 incomplete responses to the consultation, which could not be included in this analysis.

Table 1: Are you responding on behalf of..?

	Number	Percentage
Yourself as an individual	288	78.9%
A local authority or council	25	6.8%
Yourself in your professional capacity	18	4.9%
A business	13	3.8%
On behalf of a charity, voluntary or community sector organisation (VCS)	7	1.9%
Any other group or in another capacity	6	1.6%
On behalf of an educational establishment, such as a school or college	5	1.3%
A health organisation, such as a CCG, Hospital Trust or GP Practice	1	0.3%
Not answered	2	0.5%
TOTAL	365	100.0%

3.2 How respondents heard about the consultation

45% of respondents received an email from KCC about the consultation, 17% received an email from another organisation or contact, 15% found out about the consultation through social media and 11% came across the consultation through other means.

3.3 Demographics of respondents

The consultation questionnaire included a series of optional 'about you' questions designed to capture anonymous information about the respondents' protected characteristics such as sex, age, religion and disability. This information is used to check whether there are any differences in the views of different groups and to check that our decisions are being made fairly and equally.

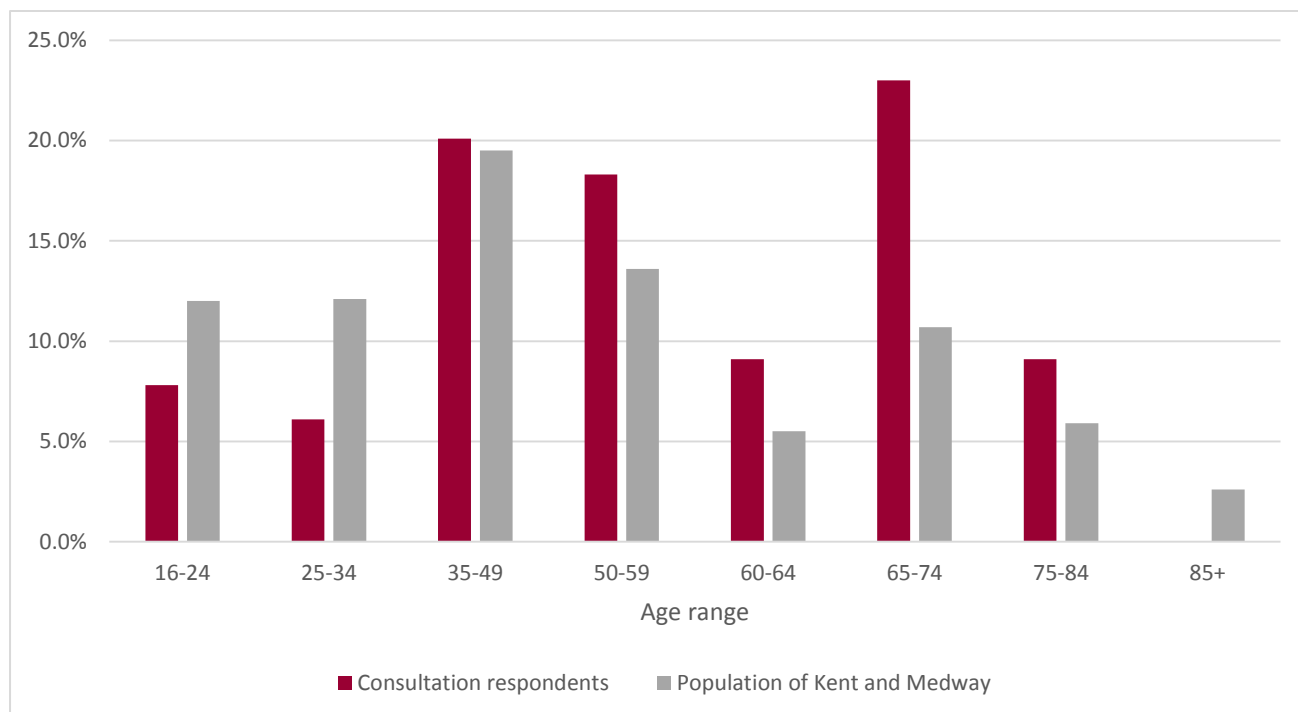
238 respondents chose to answer at least one of the 'about you' questions. The following analysis is based on those that provided information. A full profile of respondents and the Kent and Medway population is provided in [Appendix 2](#).

Of the individual respondents who provided information, 45.6% were male, which is slightly lower than the population of Kent and Medway (49.1%).

A higher proportion of people aged 65-74 responded to the consultation, than compared with the overall population of Kent and Medway (23% of respondents, compared to 10.7% of the population). The 16-34 age group was under-represented, making up only 13.9% of respondents, but 24.1% of

the population. Thirteen respondents stated that they were under 16. There were no respondents aged over 84. Figure 1 shows the breakdown of respondents' age compared to the Kent and Medway population.

Figure 1: Age of consultation respondents compared to population of Kent and Medway



Analysis of the results indicates that there is no significant variation in opinion between age groups, with all age groups showing similar levels of agreement to the questions.

Of those who provided information, 35.8% regarded themselves as belonging to a religion or belief, this is significantly lower than the proportion associated with the overall population of Kent and Medway (65.5%).

Of the 234 respondents providing information, 10.5% considered themselves to be disabled under the Equality Act 2010, which is slightly lower than the population of Kent and Medway (16.8%).

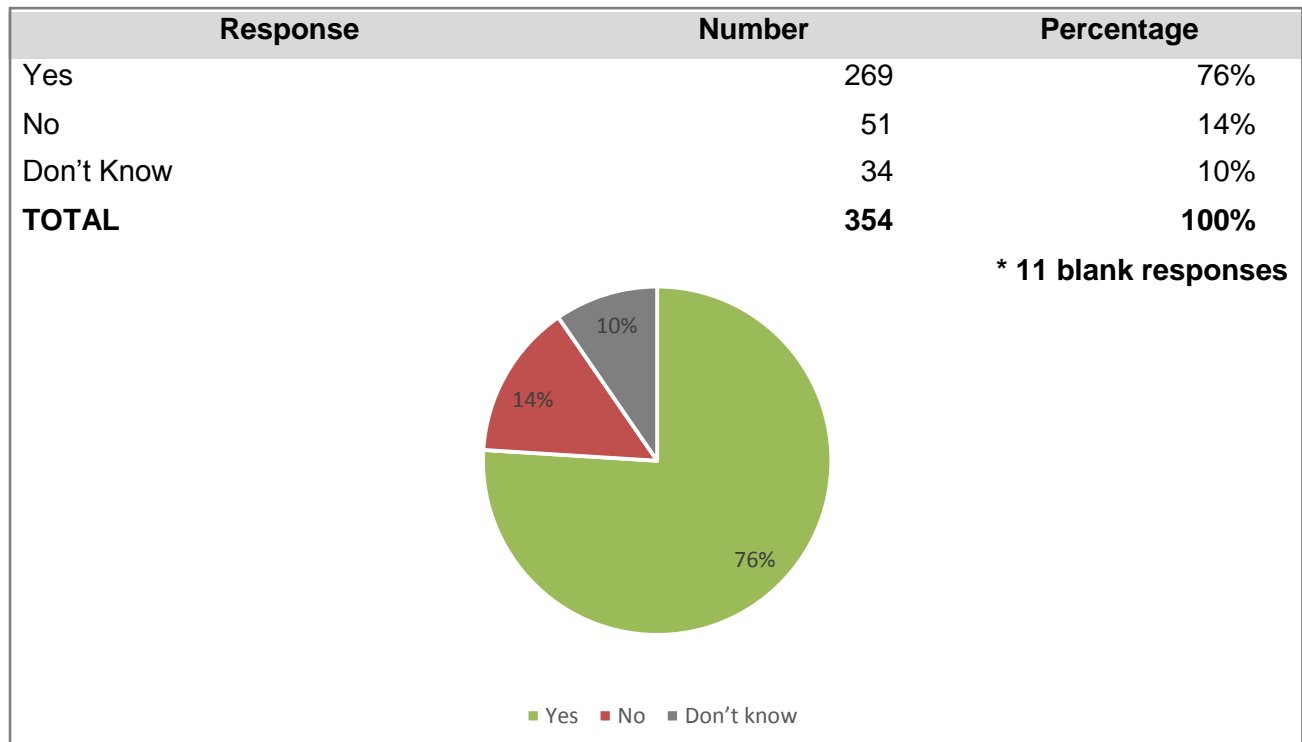
There is no significant trend for either those belonging to a religion or belief or those considering themselves disabled.

4. Consultation responses

4.1 Was the draft Kent and Medway Energy and Low Emissions Strategy easy to understand?

76% of respondents said that the draft Kent and Medway Energy and Low Emissions Strategy was easy to understand, with 14% saying that it wasn't and 10% stating that they didn't know (Figure 2). 120 respondents provided additional comments ([Appendix 3](#)).

Figure 2: Was the strategy easy to understand?



Most of the comments received related to the readability of the document. Whilst some comments were supportive, stating that the strategy was clearly written, informative, thorough and understandable; many described how the document could be improved. For instance, there was concern that the strategy was too long, repetitive and overly complicated; that there were too many acronyms and too much jargon; that it required a high level of literacy and was aimed at technical officers working in the sector; and that in places it was difficult to understand. Several comments acknowledged the complexity of the subject, with respondents stating that there was a lot to take in and comprehend. Many respondents requested a summary document, with some suggesting that a short, simple summary would appeal to a much wider public audience.

Other comments related to the content of the strategy, with many respondents stating that the language was too vague and that it wasn't clear what specific actions would be taken as a result of the strategy. Several respondents expressed concern that the action plan had not been included as part of the consultation, with others requesting that the strategy include more detail on actions, targets, funding and monitoring.

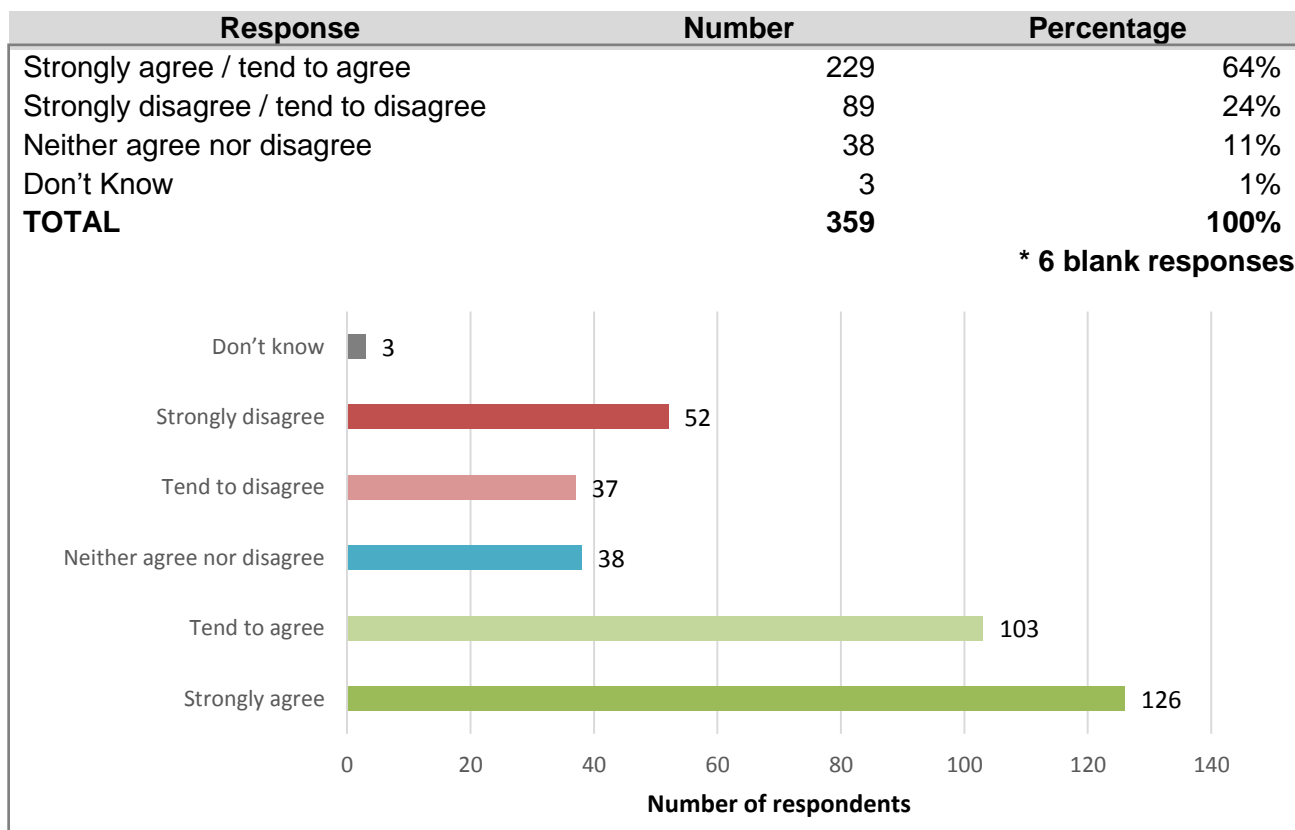
A small number of respondents found the layout and infographics confusing, however a larger number of comments expressed support for these aspects. One person experienced difficulties reading the document due to colour contrasts.

Comment summary	How we will revise the strategy
The strategy is too technical, with too much jargon and too many acronyms.	<ul style="list-style-type: none"> • We have used the consultation comments to identify the main phrases and sentences that have caused the most confusion and will replace them with clearer, simpler definitions. • We will ensure all acronyms are written in full and a full check for Plain English will be undertaken. • We will expand the glossary where necessary.
The strategy is too long and overly complicated and would benefit from a summary.	<ul style="list-style-type: none"> • We will produce a stand-alone summary document, written in a non-technical language that is suitable for a wide public audience.
It isn't clear what specific actions will be taken or how they'll be implemented.	<ul style="list-style-type: none"> • Details will be set out in the implementation plan, which will be published alongside the final strategy.
Some background colours made it visually difficult to read.	<ul style="list-style-type: none"> • We will ensure all text is on a white or high contrast background.

4.2 To what extent do you agree or disagree with the strategy's vision for Kent and Medway?

64% of respondents agreed with the strategy's vision, with just under a quarter of respondents (24%), disagreeing and 11% neither agreeing nor disagreeing (Figure 3). 195 respondents provided additional comments (A breakdown of responses is provided in [Appendix 3](#)).

Figure 3: To what extent do you agree or disagree with the strategy’s vision?



Most of the comments received related to the vision’s ambition; with over half of those providing comments expressing concern that the vision was not ambitious enough (101 comments). This comment was expressed by both those agreeing and disagreeing with the vision. Many suggested that the vision’s target date should be brought forward to dates ranging from 2025 to 2040. Local authority respondents also expressed this concern, with many stating that the 2050 target did not match the ambition set out in their own climate emergency declarations.

Some comments were supportive of the vision and others acknowledged that the vision was good but would be difficult to achieve. A small number of comments stated that the vision was not achievable, and three respondents stated that the vision was unnecessary and not a priority.

Several respondents raised concern that the vision could not be achieved whilst there was continued growth in the county, with many stating that the strategy should challenge the scale of planned growth. Several respondents commented that the 2050 target was too far in the future to be meaningful, and that interim targets or milestones should be incorporated into the vision.

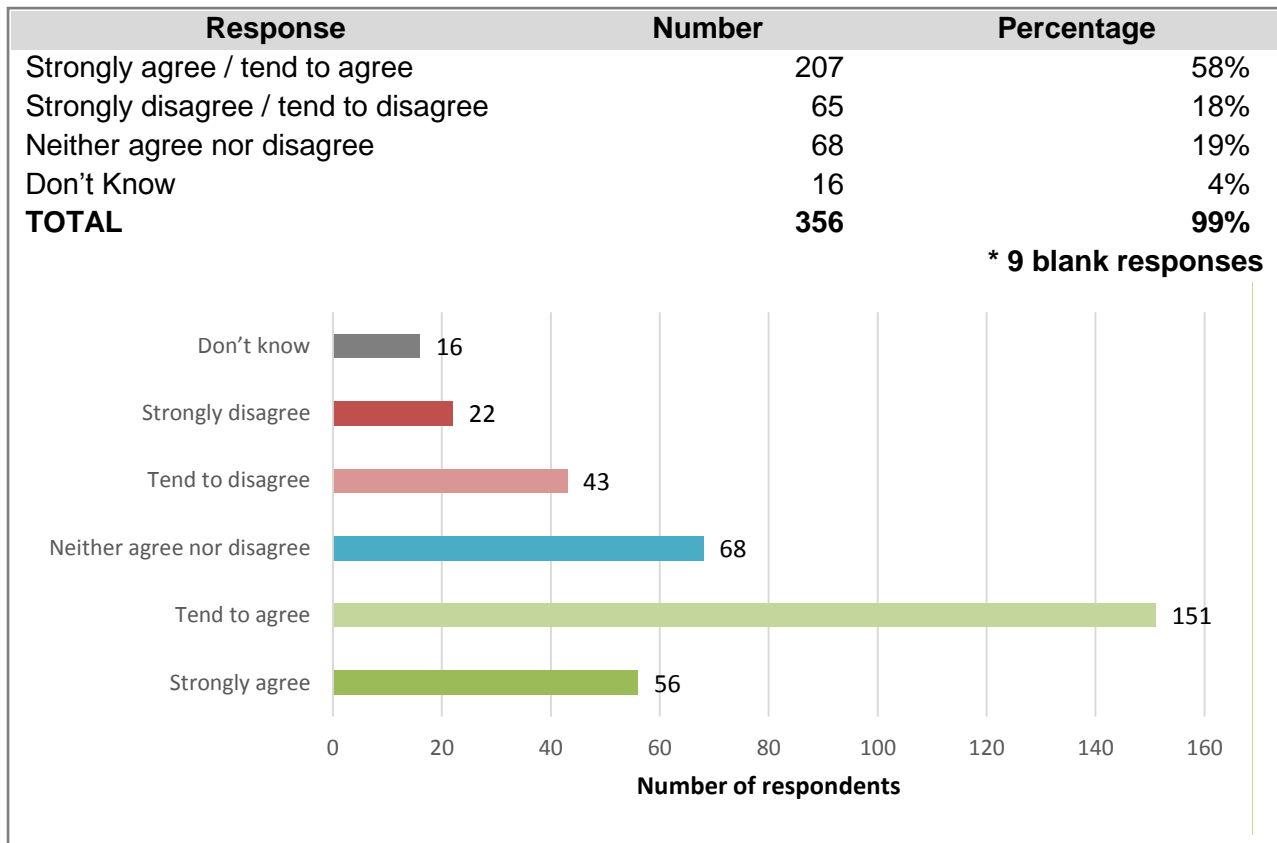
Aside from the target date and level of ambition, respondents were generally happy with the priorities contained within the vision. Some respondents commented that the vision should explicitly mention public transport and/or a commitment to reducing traffic. Others thought that the vision should reference the climate emergency and the role of the natural environment. A small number of comments raised concern about the term ‘net-zero’; with some confused about its meaning and the role of carbon offsetting, and others suggesting that the total carbon footprint of residents and the economy should be used instead.

Comment summary	How we will revise the strategy
The vision is not ambitious enough. The 2050 target is too distant to be meaningful.	<ul style="list-style-type: none"> • The vision itself will not be changed as the 2050 net-zero target is in line with the scientific advice provided by the Intergovernmental Panel on Climate Change (IPCC) and UK Committee on Climate Change and follows the target set in the Climate Change Act. • However, we will add a new page setting out interim milestones for 2025, 2030 and 2040, to show how our 2050 target will be achieved. • We will also ensure the introduction clearly references the climate emergency and the scale and urgency of the action required. • We will look to incorporate carbon budgets into the strategy and/or future monitoring.
The strategy needs to re-examine the balance between continued economic growth and sustainability.	<ul style="list-style-type: none"> • We will look to provide more information on why future growth in Kent and Medway must be zero-carbon and sustainable.
The challenges around public transport, traffic and the climate emergency should be incorporated into the vision.	<ul style="list-style-type: none"> • A vision must carefully balance succinct clarity against detail, so incorporating all challenges into a single vision is problematic. However, we will revise the vision to refer to the climate emergency and emphasise the challenges in the introduction.
There should be a clear explanation of 'net-zero' and the role of carbon offsetting.	<ul style="list-style-type: none"> • We will ensure there is an explanation of net zero within the introduction.

4.3 To what extent do you agree or disagree that the strategy will help Kent County Council and its partners achieve its vision?

Most respondents (58%) agreed that the Kent and Medway Energy and Low Emissions Strategy will help KCC and its partners achieve the strategy's vision (Figure 4). Just under a fifth of respondents disagreed (18%), and a similar amount (19%), neither agreed nor disagreed. 135 respondents provided additional comments (A breakdown of responses is provided in [Appendix 3](#)).

Figure 4: To what extent do you agree or disagree that the strategy will help KCC and its partners achieve its vision?



Of the comments received, the largest number related to the level of detail and language used within the strategy. Whilst some respondents thought that the strategy was a good starting point, many stated that the high-level nature of the document and the absence of an action plan meant it was difficult to judge whether the strategy would help partners achieve the vision.

Many comments also expressed doubts that the strategy would deliver the scale and speed of action required to achieve the vision. For instance, there was concern that the strategy failed to explain how small trials and case studies would translate into a countywide roll-out, and many felt that the 'business as usual' language was not sufficiently robust or ambitious enough to trigger the societal transformation required to achieve net-zero. There was some support for stronger and more radical actions, binding targets and strict scrutiny and enforcement to ensure the vision is achieved.

Most of the remaining comments related to issues that respondents felt would prevent the vision from being achieved. For instance, respondents noted that some of the challenges identified in the strategy were outside the scope of local government and others would require changes to government policy. There was also concern that the vision would conflict with existing council policies, particularly those relating to transport and planning, and some queried whether there was sufficient political support to make the necessary policy changes. There were also concerns about how the actions would be funded and many noted that overcoming behaviour change and altering social norms would be an issue. These issues were also discussed in later questions.

Comment summary	How we will revise the strategy
There is not enough detail in the strategy to understand how the vision will be achieved.	<ul style="list-style-type: none"> • We will publish a detailed implementation plan alongside the strategy, which will provide more information on specific actions, including who is responsible, what will be implemented and the timeframes for implementation.
The strategy doesn't address the scale and urgency of the action required to deliver the vision.	<ul style="list-style-type: none"> • We will add a new page setting out interim milestones for 2025, 2030 and 2040, which will demonstrate the need for immediate action. • We will include a new paragraph in the introduction referencing the climate emergency. • We will add a new section on climate change and the scientific advice within the evidence base.

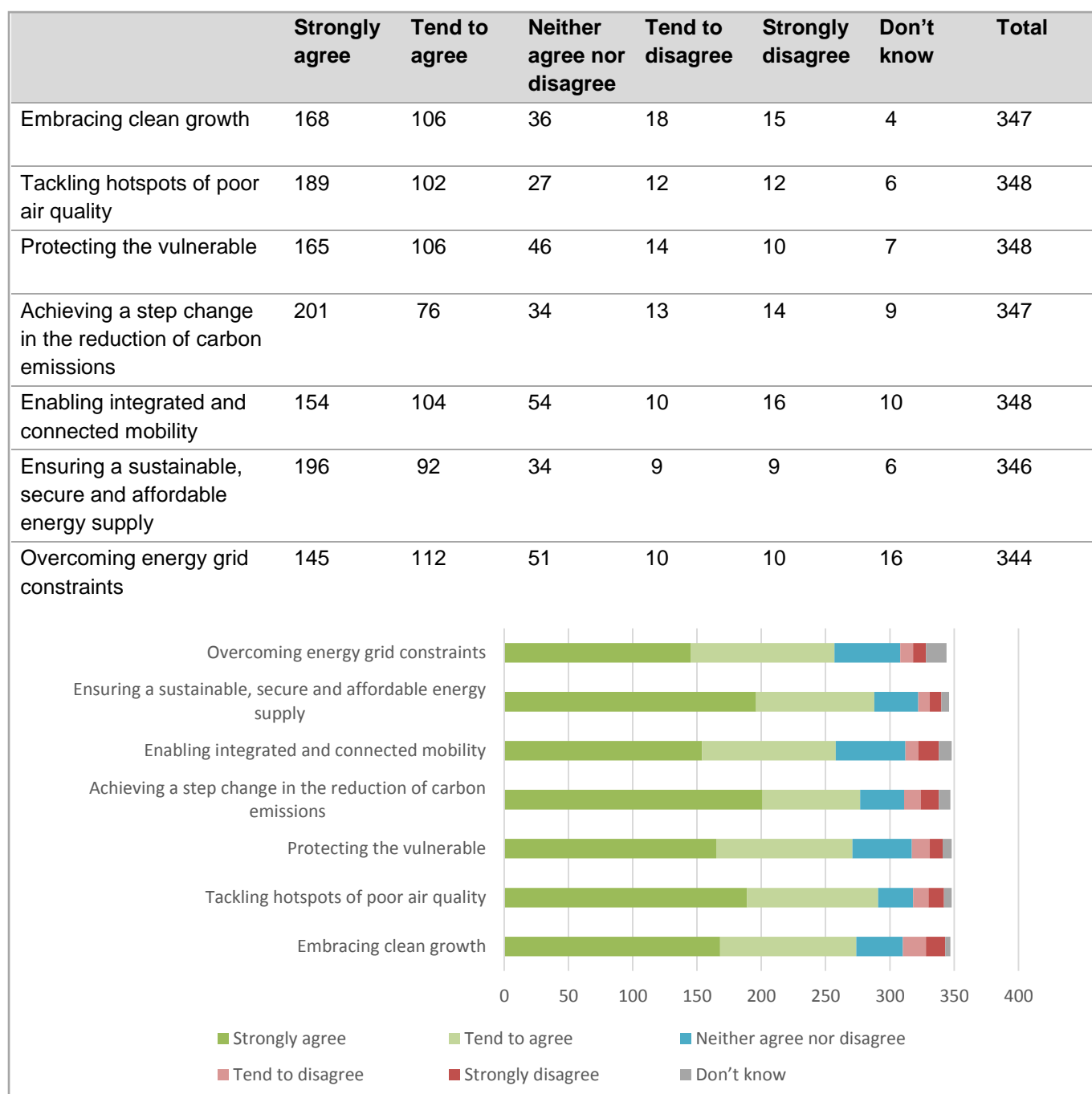
4.4 To what extent do you agree or disagree that the challenges identified in the strategy are the most significant challenges in relation to energy and emissions in Kent and Medway?

There was broad agreement that the challenges identified in the strategy were the most significant in relation to energy and emissions in Kent and Medway (Figure 5). The challenges with the greatest agreement were 'tackling hotspots of air quality' and 'ensuring a sustainable, secure and affordable energy supply', where 83% of respondents strongly or tended to agree. The challenge with the lowest agreement was 'overcoming grid constraints', with just under a quarter (73%) of respondents strongly or tending to agree. 'Embracing clean growth' received the greatest number of responses in disagreement (9.5%). 127 respondents provided additional comments (a breakdown of the responses is provided in [Appendix 3](#)).

The comments received were largely supportive of the challenges, with many respondents providing views on why a challenge was important, or how more specific or urgent actions were needed. Many comments stressed the need for improved public transport and/or the provision of alternatives to the car, with some comments suggesting that the challenge did not reflect the scale of the transport transformation that will be required. A few comments highlighted the importance of tackling household energy consumption; and others expressed support for a broad range of renewable energy technologies.

Some respondents clarified why they disagreed with a challenge. For instance, some disagreed with the need for any economic growth, others stated that clean growth was not possible and a few raised concerns about how clean growth or sustainable growth could be measured. Some comments related to the wording of the 'achieving a step change in the reduction of emissions' challenge, with many suggesting that a "step change" was not sufficient and that the title should explicitly reference the net-zero target. A small number of comments queried whether 'protecting the vulnerable' should be classified as a challenge, as it was felt that this would be achieved anyway if the other challenges were addressed.

Figure 5: Are the challenges identified in the strategy the most significant challenges in relation to energy and emissions in Kent and Medway?



Other comments recommended that additional details be included in the challenges; including the role of key organisations such as Public Health and Kent Highways, and highlighting aspects that were outside councils' control, particularly in relation to planning policy. Several respondents thought that the challenges needed to specifically reference the importance of behaviour change in addressing energy consumption and travel challenges, with some suggesting that this could be a separate challenge. Others thought that financial challenges (including funding for infrastructure or public incentives), and the need to prevent negative impacts on the vulnerable should be included within the challenges.

The remaining comments suggested alternative ideas or areas that the strategy should cover. To prevent duplication of discussion, these have been incorporated into the next section.

Comment summary	How we will revise the strategy
The transport and emissions challenges don't adequately describe the scale of change required to achieve the strategy's vision.	<ul style="list-style-type: none"> • We will review all the challenges to ensure the text adequately describes both the short- and long-term issues and priorities. • We will change the emissions challenge title to reference net-zero. • We will review the transport challenge to ensure active travel and public transport are fully included.
How can growth be clean or sustainable and how will it be measured?	<ul style="list-style-type: none"> • We will add more context around the growth agenda and ensure clean growth is fully explained in the text.
The challenges should contain more detail, such as roles and areas of influence and issues such as behaviour change, finance and equalities.	<ul style="list-style-type: none"> • Finding the right balance of detail is difficult in strategic documents, however, we will review the text to see where further information can be added.
Should 'protecting the vulnerable' be a challenge as it will be achieved if other challenges are addressed.	<ul style="list-style-type: none"> • We believe protecting the vulnerable is an important priority to ensure the strategy doesn't leave anyone behind, so we will not be removing this challenge.

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

This free-text question was answered by 64% of respondents (233 comments). A breakdown of the comments received is provided in [Appendix 3](#). Comments fell into two main categories: those that provided additional detail and commentary on activities already included within the strategy, and those that suggested alternative ideas and actions.

Comments that discussed existing high-level actions, for instance actions relating to planning policy and transport infrastructure, generally wanted to see more detail included in the strategy or provided specific suggestions on how the actions could be implemented. In some cases, there was a perception that the action or issue had not been adequately prioritised within the draft strategy. Further discussion on the strategy's priority actions are included in sections 4.6 – 4.8 (page 18-22).

The most commonly mentioned alternative ideas were:

- Incorporate green infrastructure within the strategy, including tree planting, wetland restoration, land use, soil and other natural carbon sequestration (36 comments).
- Implement actions to discourage private car use; including car free zones and access restrictions, lower speed limits, increased parking charges, road tolls and charges for high emission vehicles (24 comments).
- Offer financial incentives for residents and businesses to install renewable energy and energy efficiency measures in their homes; including changes to VAT and council tax, subsidised measures and increase energy generation payments (18 comments).

- Address emissions from shipping, air travel, agriculture, waste and the embedded carbon in goods, including imported goods (17 comments).
- Reduce the cost of public transport, with suggestions including subsidised bus and train fares, free school buses and nationalisation of bus and train services (14 comments).
- Provide specific support for geothermal, hydro, wave, tidal, onshore wind and energy from waste, not just solar and offshore wind (13 comments).

A small number of comments were also received which expressed concern about the strategy's priorities and actions. These included the impact that bio-fuel crops and solar farms constructed on agricultural land could have on food supply, landscape and biodiversity; the affordability of low carbon technology, with concern that some people could be left behind; and unease at the perceived curtailing of freedoms and demonising of cars.

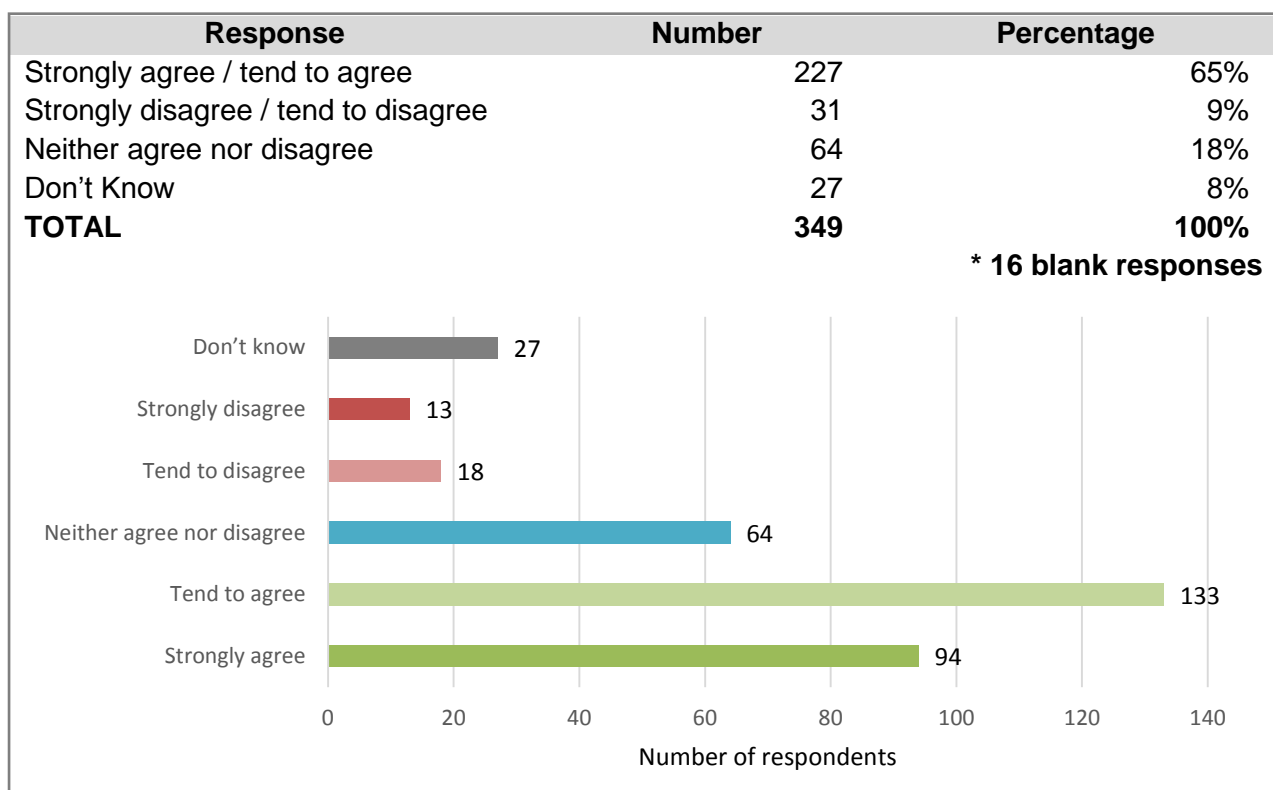
Comment summary	How we will revise the strategy
Many comments provided additional details and suggestions on how activities already included within the strategy could be implemented.	<ul style="list-style-type: none"> • Where practical, we will consider the suggestions for inclusion within the action plan.
Include green infrastructure, tree planting etc. within the strategy	<ul style="list-style-type: none"> • We will add a new paragraph within the challenges section highlighting the role of natural carbon sequestration and incorporate high level activities within theme 1 and 2.
There was a mix of opinion on whether more should be done to discourage private car use, with others uneasy at the perceived curtailing of freedoms.	<ul style="list-style-type: none"> • Our implementation plan will include a range of incentives and improvements to encourage alternatives to the private car. However, we also recognise that in many circumstances the private vehicle is the only practical option for travel. • We will consider the use of low emission zones to tackle the most polluting heavy good vehicles.
The strategy should consider financial incentives to install renewable energy and reduce energy consumption.	<ul style="list-style-type: none"> • Within the action plan we will include an action to lobby government for financial incentives to encourage the take up of more sustainable energy.
Address emissions from shipping, air travel, agriculture, waste and embedded carbon in goods, including imported goods	<ul style="list-style-type: none"> • We will revise the wording to make it clear that emissions from agriculture and waste are included within the scope of the strategy. • We will include the impact of emissions from shipping, aviation and imported goods as a challenge within the strategy. We also acknowledge that this is an area for future research to fully understand what actions can be taken at a local level.
Offer support to all renewable energy, not just solar and offshore wind.	<ul style="list-style-type: none"> • We will amend the wording in theme 3 to make it clear that we will support all suitable renewable energy technologies, including heat.

Ensure any negative impacts of actions are fully considered eg. food supply and inequalities.	<ul style="list-style-type: none"> We will ensure these are fully considered and mitigated through Environmental and Equalities Impact Assessments.
The strategy should consider other environmental aspects such as recycling, climate change adaptation, biodiversity and conservation.	<ul style="list-style-type: none"> These topics are included within the overarching Kent Environment Strategy. We will add an explanation of the Kent Environment Strategy within the introduction and include it within the glossary.

4.6 To what extent do you agree or disagree with the priorities and high-level activities in Theme 1: Building the foundations for delivery?

Most respondents (65%) agreed with priorities and high-level activities described in Theme 1 (Figure 6). A minority of respondents disagreed (9%), and just under a fifth neither agreed nor disagreed (18%). 93 respondents provided additional comments ([Appendix 3](#)).

Figure 6: To what extent do you agree or disagree with the priorities and high-level activities in Theme 1: Building the foundations for delivery?



Of the comments received, most were supportive of the priorities and activities within this theme. Many agreed that a good quality evidence base was vital for making the business case for action and others agreed that lobbying was essential to influence essential areas of policy outside local government's control. There was also support for a significant focus on behaviour change, with many stating that success would only be achieved if there was a shift in social norms and culture. Others highlighted the need for awareness raising and education amongst public sector staff,

business, industry, as well as residents; with others suggesting that action should also be targeted at schools and young people.

There was some concern that too much time could be spent on evidence gathering, rather than action on the ground, with several respondents interpreting themes 1 to 3 as linear stages, rather than concurrent activities. Others wanted to see more specific reference to planning policy; more focus on alternatives to private cars rather than electric vehicles; and more detail on how actions will be enforced.

As in previous questions, respondents reiterated the need for more detail on how objectives will be achieved and how it would be funded. Others suggested that the theme was too vague to understand what action will be taken.

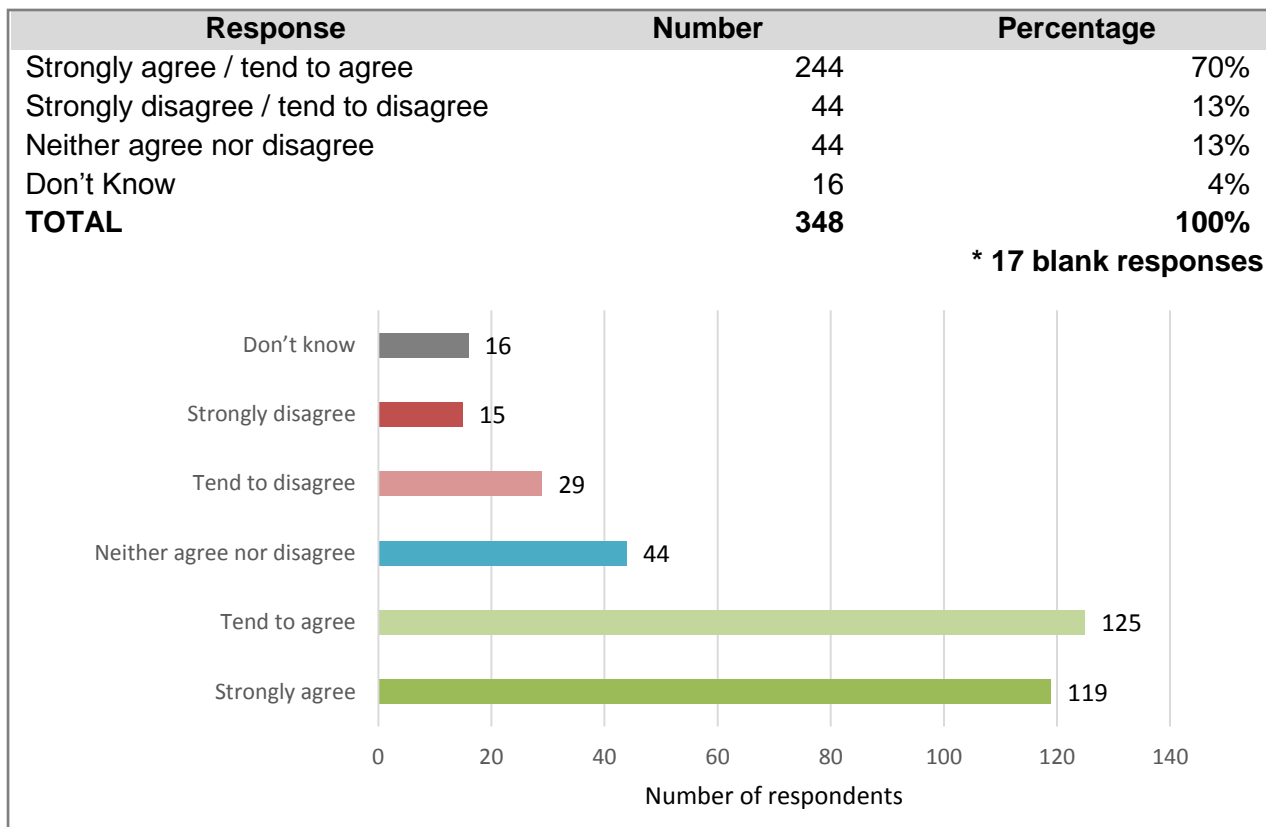
Some respondents suggested specific wording changes including; replacing “building” from the theme 1 title, to reflect that progress has already been made; reducing the number of references to electric vehicles; ensuring all the activities listed are high level and clearly explain what will be done and why; and removing vague or duplicate activities.

Comment summary	How we will revise the strategy
Several respondents thought the themes were linear stages, and others were unsure how they were connected.	<ul style="list-style-type: none"> We will revise page 16 to better explain the purpose of the themes and the concurrent nature of activity.
The theme introduction is too wordy and its unclear what or why actions will be taken. It's unclear who is responsible or whether the activities are building on existing work.	<ul style="list-style-type: none"> We will redesign the page so that there are clear headings for each priority. We will review the text to ensure there is a clear link between issues and actions and provide more information on existing activity where necessary.
1.3 is too detailed to be a classed as a high-level activity	<ul style="list-style-type: none"> This will be removed and added to the action plan.
Many queried why electric vehicles were specifically mentioned in 2.1	<ul style="list-style-type: none"> Will remove the reference to electric vehicles to make it clearer that this action refers to all planning policy.
Activities in priorities 2 and 3 are vague and unclear, with potential duplication.	<ul style="list-style-type: none"> We will review the language and ensure the high-level activities are clear in their objective, with no duplication.
Add in activities relating to best practice and case studies; new technology and research; low carbon procurement strategies; sector specific education and awareness raising	<ul style="list-style-type: none"> We will add a high-level activity about future trends. We will add a high-level activity around embedding principles into public sector policies and strategies. We will look to incorporate other suggested details into the action plan.

4.7 To what extent do you agree or disagree with the priorities and high-level activities in Theme 2: Making the best use of resources, avoiding or minimising negative impacts?

Most respondents (70%) agreed with priorities and high-level activities described in Theme 2 (Figure 7). A small number of respondents disagreed (13%), and the same amount neither agreed nor disagreed. 102 respondents provided comments (a breakdown is shown in [Appendix 3](#)).

Figure 7: To what extent do you agree or disagree with the priorities and high-level activities in Theme 2: Making the best use of resources, avoiding or minimising negative impacts?



Like the previous question, many of the comments were supportive of the priorities in theme 2; however, a large number wanted to see the proposed actions go further and be more ambitious. For instance, there was strong support for actions to tackle energy efficiency in homes, businesses and public sector estate. However, respondents also wanted to see a commitment to improve all buildings, not just new build and refurbishment, or fuel poor or difficult to treat housing. Likewise with transport and travel, respondents were supportive of the proposed activities but wanted to see greater commitment to low carbon alternatives to the car and significant improvements to public transport, particularly in rural areas.

Many respondents were keen to express their concern that the proposed high-level activities fell far short of the activity needed to lower emissions from buildings and transport to net-zero. There was concern that the theme was describing 'business as normal' activities, with some respondents stating that a lack of clarity in the theme's long-term objectives or outcomes meant it was hard to see whether any change would occur, or if anything new would happen.

Local authority respondents were keen to see the theme make stronger links to Local Plans; local transport, cycling and green infrastructure strategies; as well as Air Quality Management Areas (AQMAs). There were also suggestions that the theme should include high level activities around the roll out of electric buses; anti-idling zones; promotion of private car alternatives including car clubs, car share, e-bikes, demand responsive transport and mobility as a service; energy efficiency and renewable energy programmes for all buildings; and reducing emissions from all council operations including fleet and procurement.

Comment summary	How we will revise the strategy
The theme doesn't adequately describe the changes that need to take place or theme's long-term objectives and outcomes.	<ul style="list-style-type: none"> We will redesign the page so that each priority clearly describes the long-term objective and makes links to existing activity and immediate next steps and milestones.
The theme isn't ambitious enough and the actions are not sufficient to achieve the vision.	<ul style="list-style-type: none"> The energy and transport sectors are rapidly transforming, which makes it difficult to understand the public sector's role in the transformation in the medium to long term. For this reason, we have focused on the immediate priorities and accept that further activities will need to be identified in future iterations of the strategy. We hope that the addition of milestones will show the long-term trajectory for activities in this theme.
Some high-level activities are too vague, whilst others are too specific and miss key aspects.	<ul style="list-style-type: none"> We will review the language and ensure the high-level activities clearly state the strategic action and objective.
A range of specific actions were suggested for inclusion within the theme.	<ul style="list-style-type: none"> We will review the list of suggested actions and incorporate into the activity description or detailed action plan where possible.

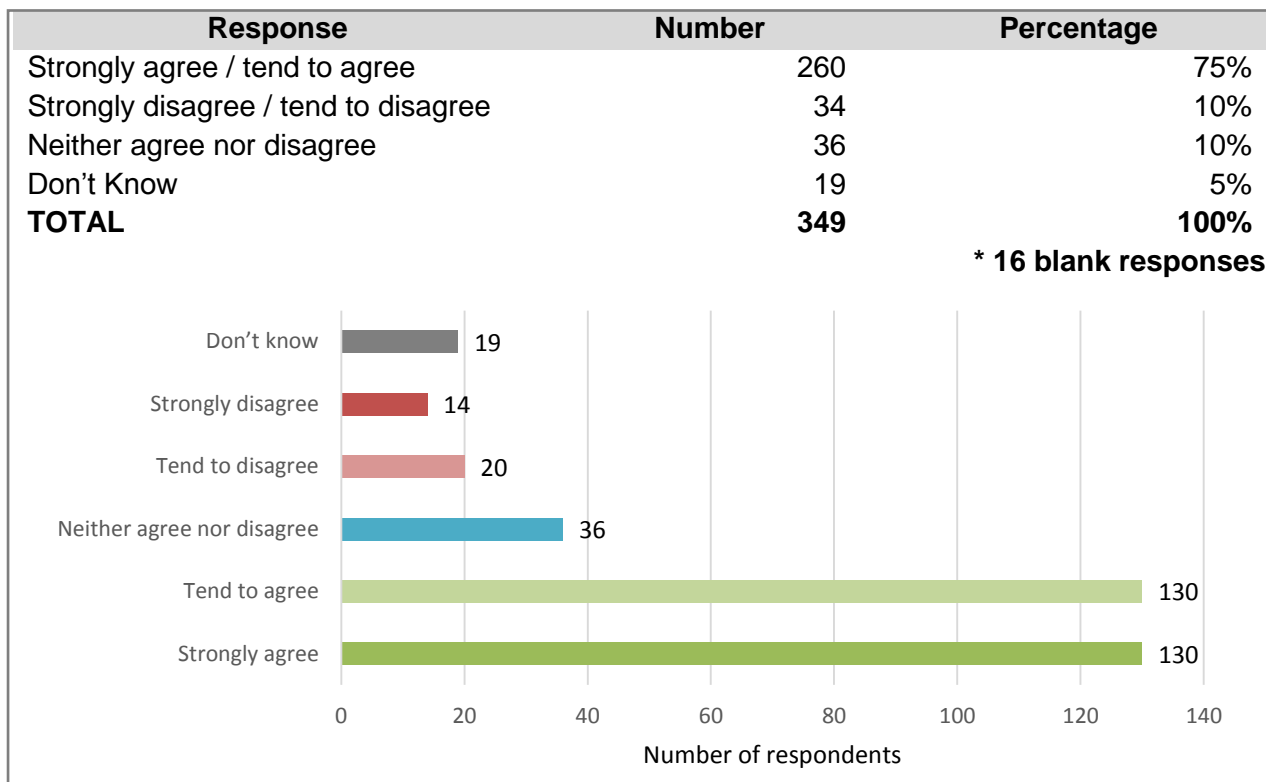
4.8 To what extent do you agree or disagree with the priorities and high-level activities in Theme 3: Towards a sustainable future?

Three quarters of respondents (75%) agreed with the priorities and high-level activities described in Theme 3 (Figure 8). A small number of respondents disagreed (10%), and the same amount neither agreed nor disagreed. 105 respondents provided comments (a breakdown is shown in [Appendix 3](#)).

The comments received reflected previous comments; such as the actions are not sufficient to achieve the scale of change required and the actions need to be developed and delivered more urgently. There was strong support for informed planning decisions, with many respondents highlighting the need for government to allow the setting of zero-carbon planning policies and the importance of influencing Local Plans.

Many comments expressed support for increasing renewable energy, with many suggesting that the strategy should support a wider range of technologies, including wave, tidal and onshore wind and that there should be specific support for the solar sector and supply chain. There was some opposition to the strategy supporting biofuels and solar farms, due to the perceived loss of agricultural land or land which could otherwise be used for reforestation. There were also concerns about the potential impact on air quality and greenhouse emissions when biofuels are processed and burnt for energy. There was also a small amount of opposition to the strategy's support for Compressed Natural Gas (CNG) fleet fuelling.

Figure 8: To what extent do you agree or disagree with the priorities and high-level activities in Theme 3: Towards a sustainable future?



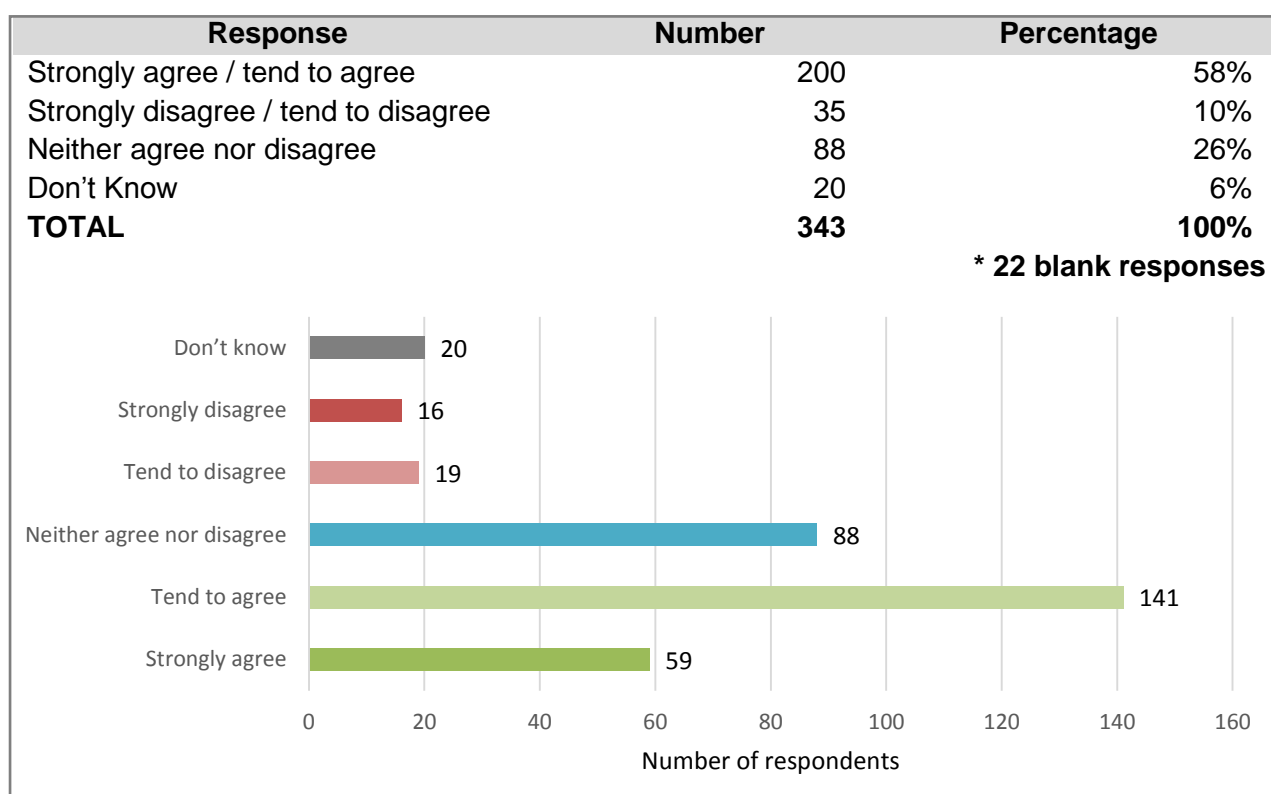
Some respondents criticised the theme’s lack of vision, with some describing the theme as a ‘random list of actions’ and others expressing concern that the actions were too limited or specific in their scope. For instance, action 7.4 describes an activity to support the roll out of low carbon heating for off-gas homes, but it was suggested that this activity should be broadened to support all buildings to transition to low carbon heating. Others noted that the theme 3 priorities described on page 26 didn’t reflect the full range of activities described in the table on page 27.

Comment summary	How we will revise the strategy
The theme’s narrative doesn’t adequately describe range of high-level activities being considered.	<ul style="list-style-type: none"> We will edit the wording so that the priority clearly describes the theme’s long-term objective, immediate high-level activities and milestones.
The theme lacks vision and there is inconsistency and/or lack of breadth in the activities’ scope.	<ul style="list-style-type: none"> We will review the language and ensure the high-level activities reflect the strategic actions and objectives.
Reconsider support for biofuels and Compressed Natural Gas (CNG) due to their negative impacts.	<ul style="list-style-type: none"> CNG is an interim fuel that will help Heavy Goods Vehicles move away from diesel before transitioning to a more sustainable, zero-carbon fuel in the long-term. Our support aims to assist with this transition, which will ultimately be led by the transport sector.

4.9 To what extent do you agree or disagree with the proposed indicators to measure success?

Just over half of respondents (58%) agreed with the proposed indicators to measure success (Figure 9). About a quarter of respondents (26%) neither agreed nor disagreed with only 10% disagreeing. 118 respondents provided comments (a summary is shown in [Appendix 3](#)).

Figure 9: To what extent do you agree or disagree with the proposed indicators to measure success?



The comments received were generally supportive of the proposed indicators, although many respondents requested that baselines and targets be included to make them more meaningful and others queried how they would be measured.

Some respondents highlighted the need for better air quality monitoring, with some stating that the existing monitoring network did not provide a true assessment of air quality in Kent and Medway. Many respondents suggested alternative or additional indicators, including:

- Per capita carbon dioxide emissions
- Total greenhouse gas emissions (not just carbon dioxide emissions)
- Full breakdown of emissions by all sectors
- Total carbon footprint of residents
- Maximum exceedance of air quality limits
- Number of deaths associated with poor air quality
- Total miles travelled by local authority staff
- Renewable energy generation and supply (not capacity)
- Display Energy Certificate (DEC) rating of buildings
- Number of homes using smart meters

- Use of public transport
- Use of park and ride schemes
- Number of car clubs and car sharing schemes in operation
- Length of cycle lane and footpath created or improved
- Number of 20mph zones
- Breakdown of all vehicles by fuel type and vehicle type
- Number of excess summer deaths
- Public perception
- Tree coverage
- Wetland expansion
- Number of urban trees removed / replaced
- Number of councils reporting and delivering on climate emergency pledges.

Several respondents requested the inclusion of more qualitative indicators, such as behaviour change, modal shift, social attitudes and mental health and wellbeing. There were also requests for links to broader indicators such as wage growth, job creation, biodiversity and illness.

Comment summary	How we will revise the strategy
The strategy's indicators should include a baseline, target and methodology.	<ul style="list-style-type: none"> • Baselines will be set for all indicators included in the strategy. • We will add some introductory text explaining the methodology and monitoring process.
A range of alternative or additional indicators were suggested.	<ul style="list-style-type: none"> • We will look to include some of the suggested indicators where the data exists at a local level and where it offers added value. • Some of the suggestions are too detailed for inclusion within the strategy, but we will look to incorporate these into the evidence base. • We will also include the development of some suggested new indicators (where local data doesn't currently exist), within the implementation plan.

4.10 Do you have any other comments to make about the draft Energy and Low Emission Strategy?

This free-text question was answered by 60% of respondents (218 comments). A breakdown of the comments is provided in [Appendix 3](#).

Many of the respondents drew on points made in previous questions, with a third of the comments reiterating calls to make the strategy more ambitious and urgent, and voicing concerns that the strategy was not sufficient to tackle the scale of the issues. Respondents also repeated calls for interim targets, a detailed action plan and more information on how the strategy will be funded and monitored.

Many respondents took the opportunity to declare their support for the strategy or to reaffirm their support for specific priorities; such as robust planning policy, better foot and cycle path infrastructure and encouraging behaviour change. Some comments, particularly those from local

authorities, highlighted the need to work in partnership across Kent to implement the strategy, with others advising that the strategy will only be successful if the buy-in from politicians and the private sector is secured.

Several respondents expressed their interest in working with partners to further develop the strategy or contribute to evidence and actions. There were also calls to involve communities, action groups, charities and universities in the development of plans.

A small number of respondents expressed their disagreement with the strategy, either because they did not agree that the issues were important enough, or because they saw the strategy as a ‘tick-box’ exercise that wouldn’t deliver the action required. Several comments referenced environmental and social issues outside the scope of this strategy; such as global politics, international trade and a range of government’s social and economic policies.

Comment summary	How we will revise the strategy
The strategy doesn’t adequately explain how charities, universities, partnerships and forums will be involved, or how the relationships will be facilitated.	<ul style="list-style-type: none"> • We will look to improve the information provided on pages 29-30.
The strategy should outline how it will involve communities and action groups in the development of plans.	<ul style="list-style-type: none"> • We will include an action to consider how we engage with the wider community in the implementation plan.

5. Equalities Impact Assessment

In order to provide assurance and evidence that an equality analysis has been undertaken and considered as part of the strategy’s development, an Equalities Impact Assessment (EqIA) was published with the consultation documents. Respondents were invited to provide comments about equalities and/or the EqIA. 14% of respondents provided a written response (52 comments), a breakdown of the comments is provided in [Appendix 3](#).

A range of comments were received: some thought that EqIAs were unnecessary; others didn’t feel a discussion on equalities was needed as the strategy’s vision and priorities were of equal concern and benefit to all; several simply outlined their support for parity and a level playing field. A few respondents repeated their call for greater urgency and expressed their concern that a failure to act on the climate emergency would have an unequal and detrimental impact on the young and vulnerable.

Some respondents did provide suggestions on how the EqIA could be improved. For instance, there was a call for the EqIA to address the equalities risks to vulnerable groups such as older people, people on low incomes and those with long-term health problems and/or disabilities. Respondents were concerned that these groups were not only at greater risk from the impacts of climate change, poor air quality and fuel poverty, but were also the least likely to have the social support or disposable income necessary to mitigate these risks. It was noted that these groups were already disadvantaged by the lack of affordable energy and that future policies should aim to rectify this.

The gypsy and traveller communities were also identified as having specific vulnerabilities in relation to fuel supply, accommodation and long-term illness and it was suggested that specific consideration should therefore be given to this group.

Other concerns related to transport infrastructure and the cost of technology. There was concern that the strategy needed to do more to ensure that those living in rural areas benefit from the strategy as much as those living in urban areas, particularly in relation to the provision of public transport. There was also concern that many low carbon technologies (eg. electric vehicles, solar panels and alternatives to gas heating), require a large financial investment up-front that would be prohibitively expensive for many residents.

Some respondents commented on equalities issues outside the scope of this strategy, such as the provision of disabled parking bays and the risks posed by flooding and heatwaves.

Comment summary	How we will revise the strategy
The strategy / EqIA should address the issues experienced by vulnerable groups including those on low incomes, long-term health issues, older people and gypsy and traveller communities.	<ul style="list-style-type: none"> • We will review the risks and update the EqIA. • We will add an action to the implementation plan if further evidence is required to understand current or future risks. • We will expand the ‘protecting the vulnerable’ challenge to include energy and fuel poverty.
The EqIA should specifically reference fuel poverty.	<ul style="list-style-type: none"> • We will include fuel poverty in the EqIA.

Appendix 1: List of organisations responding to the public consultation

The following organisations responded to the public consultation on the draft Kent and Medway Energy and Low Emissions Strategy:

- Royal British Legion (branch)
- Bidborough Parish Council
- RJ Barwick Ltd
- Tonbridge and Malling Green Party
- Eynsford Parish Council
- Port of London Authority
- Maidstone Borough Council
- Sevenoaks District Council
- Contracts Engineering Limited
- Bloomsbury Biddenden Ltd
- Bion Energy Ltd
- OSET Bikes Ltd
- The Coloured Render Co Ltd
- Baylis Landscape Contractors Ltd
- Westerham Town Council
- Tunbridge Wells Borough Council
- Ashford Borough Council
- O'wango & TT Smart Ltd
- Chartham Parish Council
- Boughton Monchelsea Parish Council
- Tonbridge and Malling Borough Council
- Swale Borough Council
- Walmer Parish Council
- Deal Town Council
- 20's Plenty for Kent
- Southborough Town Council
- Dover District Council
- New Romney Town Council
- Faversham Town Council
- Swale Friends of the Earth
- Medway Council
- Biodiversity International Ltd
- Sevenoaks Bicycle Users Group
- Tunbridge Wells Bicycle Users Group
- Canterbury City Council
- Faversham Town Council
- Folkestone and Hythe District Council
- Magneum Innovation Ltd
- Tunbridge Wells Friends of the Earth
- Iwade Parish Council

Appendix 2: Profile of respondents and Kent and Medway population

	Total		Kent and Medway Population	
Base	365		1,817,400	
	<i>Number</i>	<i>Percentage</i>	<i>Number</i>	<i>Percentage</i>
Gender:				
Male	109	46.9%	893,100	49.1%
Female	123	53.1%	924,300	50.9%
Prefer not to say/unspecified	133	NA	NA	NA
Same gender as born:				
Yes	229	100%	NA	NA
No	0	0%	NA	NA
Prefer not to say/unspecified	136	NA	NA	NA
Age:				
			*0-14 /15-24	
0-15	13	5.6%	331,200	18.2%
16-24	18	7.8%	219,500	12.0%
25-34	14	6.1%	218,600	12.1%
35-49	48	20.1%	354,100	19.5%
50-59	42	18.3%	245,500	13.6%
60-64	21	9.1%	99,400	5.5%
65-74	53	23.0%	194,200	10.7%
75-84	21	9.1%	108,200	5.9%
85+	0	0%	46,600	2.6%
Prefer not to say/unspecified	135	NA	NA	NA
Whether belong to a religion:				
Yes	77	35.8%	1,132,289	65.5%
No	138	64.2%	470,586	27.2%
Prefer not to say/unspecified	150	NA	124,790	7.2%
Type of religion:				
Christian	64	83%	1,067,837	61.8%
Buddhist	3	4%	7,739	0.4%
Hindu	1	1%	13,699	0.8%
Jewish	1	1%	1,985	0.1%
Muslim	1	1%	19,101	1.1%
Sikh	0	0%	14,391	0.8%
*Other	6	8%	7,537	0.4%
Unspecified	7	NA	124,790	7.2%
Whether have a disability:				
Yes	24	10.5%	285,236	16.8%

No	205	89.5%	1,410,497	83.2%
Prefer not to say/unspecified	136	NA	NA	NA
Type of disability:				
Physical impairment	12	48%	95,987	67.1%
Sensory impairment	6	24%	NA	NA
Long standing illness/health condition	5	20%	NA	NA
Mental health condition	6	24%	27,405	19.2%
Learning disability	1	4%	19,652	13.7%
Other*	2	8%	NA	NA
Prefer not to say	3	12%	NA	NA
Carer:				
Yes	22	9.6%	176,064	10.3%
No	206	90.3%	1,519,669	89.6%
Prefer not to say/unspecified	137	NA	NA	NA
Ethnic Group:				
White English/Scottish/Welsh/Northern Irish/British	197	84.9%	1,529,212	88.5%
White Irish	4	1.7%	12,185	0.7%
White Gypsy or Irish Traveller	0	0%	5,195	0.3%
White Other*	16	6.9%	61,089	3.5%
Mixed White & Black Caribbean	0	0%	7,996	0.5%
Mixed White & Black African	0	0%	3,732	0.2%
Mixed White & Asian	0	0%	9,066	0.5%
Mixed Other*	1	0.4%	6,489	0.4%
Indian	1	0.4%	25,268	1.5%
Pakistani	0	0%	3,922	0.2%
Bangladeshi	0	0%	4,685	0.3%
Chinese	0	0%	7,043	0.4%
Other Asian	1	0.4%	20,311	1.2%
African	0	0%	16,265	0.9%
Caribbean	0	0%	4,721	0.3%
Other Black	0	0%	1,893	0.1%
Arab	0	0%	2,052	0.1%
Any other ethnic group	0	0%	6,541	0.4%
I prefer not to say	12	5.1%	NA	NA
Unspecified	133	NA	NA	NA

Appendix 3: Coded responses to open ended questions

Comment	Q4. Was the ELES easy to understand?				
	Total	Yes	No	Don't know	No selection
It was understandable / clearly written / informative / thorough	25	23	0	2	0
It was too long / too wordy / repetitive / overly complicated	23	6	13	4	0
It was too vague / wasn't clear what specific actions will be taken	20	7	13	0	0
There were too many acronyms / jargon / abbreviations	13	1	9	3	0
A summary would be helpful	10	7	3	0	0
Requires technical knowledge / high literacy to understand	9	8	1	0	0
It was difficult to understand / confusing / misleading	8	1	6	0	1
The strategy is not ambitious enough / needs stronger language	8	7	1	0	0
The strategy should have included other actions	8	4	3	1	0
Understandable but a complex subject to take in / comprehend	7	3	1	3	0
Strategy needs to be supported with an action plan / specific targets	6	6	0	0	0
I like the infographics	6	5	0	1	0
It wasn't clear how things would be monitored	4	1	3	0	0
I liked the layout	3	2	0	1	0
I didn't agree with all the strategy	3	2	1	0	0
I am supportive of the strategy / one of the strategy's objectives	3	3	0	0	0
It's not achievable / will not be achieved	3	2	0	1	0
I didn't like the infographics	2	1	1	0	0
I didn't like the layout	2	0	2	0	0
I had technical issues with document / website	2	0	1	0	1
It was visually difficult to read	1	1	0	0	0
It's not young person friendly	1	1	0	0	0
Has too many references to other documents	1	0	1	0	0
Other	8	6	0	1	1
No comment	244	194	20	23	8

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

Comments	Total	Agree (strongly / tend to)	Disagree (strongly / tend to)	Neither agree nor disagree	Don't know	No selection
Vision is not ambitious enough / vision should be achieved earlier than 2050	101	32	60	7	1	1
Good vision, but it will be difficult to achieve	14	9	4	1	0	0
Do not agree with continual growth / growth contradicts vision	12	3	9	0	0	0
The vision is too vague / not clear how it will be achieved	11	8	1	2	0	0
Vision is good / realistic / achievable	11	10	0	0	0	1
Vision is unrealistic / not achievable	10	1	7	2	0	0
Vision should reference public transport / traffic	10	4	4	1	0	1
Milestone or interim targets would be helpful	9	4	2	3	0	0
The vision largely supports my priorities / my priorities are included within the strategy	7	7	0	0	0	0
The vision should reference climate emergency	7	2	4	1	0	0
Don't like 'net-zero' expression / should use alternative to 'net-zero'	5	1	3	1	0	0
Existing transport policies don't align with this vision	5	4	1	0	0	0
Vision should reference afforestation / carbon sequestration	5	1	4	0	0	0
I don't agree with air quality aspect of the vision	4	2	2	0	0	0
I don't agree with the vision / there are more important issues to focus on	3	0	2	1	0	0
Concerned about impact of traffic from outside Kent	2	2	0	0	0	0
Air quality is only one part of problem / its more than just air quality	2	2	0	0	0	0
Could consider the circular economy, not just low carbon	2	1	1	0	0	0
The vision should reference good quality of life and ecosystems	1	0	1	0	0	0
As long as it happens	1	1	0	0	0	0
There's no evidence that net-zero and improved air quality will improve economic competitiveness	1	1	0	0	0	0
How was the target date derived?	1	1	0	0	0	0
Other	23	17	5	1	0	0
No comment	170	136	4	24	2	4

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

	Total	Agree (strongly / tend to)	Disagree (strongly / tend to)	Neither agree nor disagree	Don't know	No selection
Too vague to judge / strategy requires more specific actions / need a detailed plan	31	9	12	10	0	0
Need more urgent action / increased scale of action / document shouldn't be 'business as usual'	25	7	15	3	0	0
Needs binding targets / enforcement / scrutiny that its being followed	22	9	8	5	0	0
The strategy has missed out actions that would help achieve the vision	21	6	10	5	0	0
It will help / it's a start / something to aim for	18	12	1	5	0	0
Conflicts with council transport or planning policies / requires changes to polices	12	5	5	2	0	0
Government policy has greater influence / delivery is outside council scope / requires lobbying	12	6	5	1	0	0
Overcoming behaviour change / social norms will be an issue	10	4	3	3	0	0
Funding will be an issue	10	4	3	2	1	0
Will require strong political support / buy-in from decision makers	8	3	3	2	0	0
Low expectation of anything happening	5	1	2	1	1	0
Needs stronger language	5	3	2	0	0	0
No, as the vision isn't realistic / achievable	2		2	0	0	0
The strategy will waste money	2	1	1	0	0	0
It would be good to see pressure to stop the commute	1	1	0	0	0	0
Other	10	7	2	1	0	0
No comment	198	127	12	36	14	9

Q7. To what extent do you agree or disagree that the challenges identified in the ELES are the most significant challenges in relation to energy and emissions in Kent and Medway? Any additional comments	
	Total
Improving public transport / alternatives to car is key priority	25
They are all important challenges / supportive of priorities	18
Growth will prevent vision being achieved	18
Need more urgency than step change in emissions reduction / 2050 is too late	15
Lobbying government / influencing action outside council control is challenge	14
Council transport/planning policies make challenges worse / policies need to change	10
Domestic energy use / planning policy is key challenge	10
I support renewable energy / all renewables should be considered	10
Changing behaviour and social norms is a challenge	9
Must include natural processes / increasing carbon sequestration / tree planting / wetlands	7
Need financial incentives /people need financial assistance	6
Air quality is an urgent issue / tackling air quality is important	5
Protecting vulnerable is consequence of tackling other challenges	5
Must include total carbon footprint of Kent / embedded emissions in goods and services / air travel / shipping	5
Strategy should also consider impacts on habitat / wildlife	4
I don't support renewable energy technology / renewables are unreliable	3
Changes must not negatively impact the vulnerable / low carbon must be affordable	2
Tackling carbon emissions most important priority	2
I don't agree with any of the challenges	2
Ensuring actions are integrated is important / challenges are interlinked	2
Improving quality of life is important	2
Overcoming energy grid constraints is important	2
Meaningful CO2 reduction is impossible / these things are difficult to change	2
Consider publicly owned renewable energy supply / nationalise energy	2
Grid constraints should include those off-gas using oil	1
High costs / impact on profits will be a challenge to action	1
Need to reference meat industry / promote veganism	1
Ensuring sustainable energy supply is important / should include switch away from gas	1
Growth is important / priority	1
I don't know / don't understand	3
Other	15
No comment	237

Q8. Do you have any alternative ideas or areas you think the strategy should cover that it does not currently?	
	Total
Planning policy to ensure all new developments are zero carbon / don't increase air pollution	37
Include green infrastructure / tree planting / wetland restoration / sequestration / land use / soil management	36
Greater urgency / address climate emergency / net zero before 2050	22
Improve public transport: quality / frequency / reliability / convenience / availability	26
Increase walking / cycling routes / better infrastructure	25
Discourage private car use: Restrict vehicle access / lower speed limits / parking charges / road tolls / pollution charges	24
Include behaviour change / change perceptions / raise awareness / educate	23
Lobby government to change policies / provide funding / subsidies	17
Include emissions from shipping / air travel / agriculture / waste / embodied carbon in goods	17
Reduce cost of public transport / free school buses	14
Fast EV charging points / better charging networks / help for homes with no parking	14
Subsidise domestic low carbon technology / incentivise low carbon living / prioritise retrofit	14
More detail: how actions will be funded / implemented / impact on emissions / roadmap to net-zero	13
Support geothermal / hydro / wave / tidal / onshore wind / energy from waste	13
Low Emission Zones / ban polluting vehicles	12
Invest in innovative technologies / support local low carbon businesses	10
Limit population growth / no more house building / growth is a major problem	10
Cover diet / veganism / meat and dairy consumption / food	10
Support or incentivise installation of low carbon tech in business / industry / public sector / churches	9
Roll-out of electric / low carbon public transport / public sector vehicles	8
Tackle contradictory council policies / embed ELES in all council policies	8
Biodiversity / conservation / animal protection	7
Switch to low carbon HGVs / address pollution from HGVs	7
Enforce anti-idling zones / target anti-idling / traffic light phasing to reduce idling	7
Review support for new nuclear / increase nuclear	7
Use global best practice / collaborate with others	7
Support alternatives to private car: car clubs / scooter hire / bike hire / transport on demand / mobility as a service	5
A plan to switch all buildings away from gas heating / those off-gas to switch away from oil / support for heat pumps	5
Consider impact of solar farms on food supply, landscape, biodiversity	5
Affordability of low carbon tech / provide grants to those on low incomes / ensure no one is left behind	4
Don't restrict private car use / cars are part of life	3
Better / more air quality monitoring	3
Battery storage / vehicle to grid technology / overcome renewable intermittence	3

Remove school choice policy	2
Consider recycling facilities for low carbon tech / support for circular economy	2
Impact of Brexit	2
Expand availability of domestic gas heating network	1
nationalisation of public transport / energy supply	1
Consider use of inland waterways	1
Consider negative impacts of biofuels	1
Divest pension funds away from fossil fuels	1
Address issues of resource scarcity	1
Simplify recycling	1
Other	23
No comment/ no further comment	147

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

	Total	Agree (strongly / tend to)	Disagree (strongly / tend to)	Neither agree nor disagree	Don't know	No selection
Agree with priorities and activities / support them / they are important	18	16	0	1	0	1
These activities mustn't delay action on the ground / need action now	12	7	2	3	0	0
Support a focus on behaviour change / need to shift beliefs and norms / need to inform and educate people	12	10	0	2	0	0
Need specific reference to low carbon planning policy	10	6	1	2	0	1
Activity 1.3 is not a high-level activity / 1.3 needs to cover other aspects	9	6	0	2	0	1
Need more detail on how things will be achieved / need action plan and timelines	6	4	0	1	1	0
Theme lacks substance / words are too vague	6	3	1	1	1	0
Too much focus on electric vehicles / need to focus on alternatives to private vehicles	6	3	1	2	0	0
Support collaborative approach / need to work in partnership	6	5	0	1	0	0
Scope and ambition is inadequate / target needs to be earlier than 2050	5	1	0	2	0	2
Don't agree with growth priority / growth is not sustainable	4	2	2	0	0	0
Need reference to expanding tree coverage /	4	0	3	1	0	0

carbon sequestration						
Do not agree or support priorities and activities / need to reprioritise	4	0	4	0	0	0
I don't understand	4	1	1	0	2	0
Lobbying national government is key priority	3	3		0	0	0
How will actions be enforced / proposals carry no weight in law	3	1	1	0	0	1
Need to take into account global impact of actions / total carbon footprint of residents	3	1	1	1	0	0
There is no leadership / no political will to deliver	2	0	2	0	0	0
Partners need to be ethos based not profit based / partnerships not correct approach	2	2	0	0	0	0
Should include case studies and best practice / should have sector champions to sell business case	2	1	0	1	0	0
Priorities need to be regularly reviewed to ensure methodology is still valid	2	1	0	1	0	0
Should include low carbon public sector procurement policies / supply chain policies	2	2	0	0	0	0
Need to focus on heavy industry / need to target the biggest polluters	2	2	0	0	0	0
Need annual targets and publish progress against targets	1	1	0	0	0	0
Need to ask residents and workers what they want to see in this policy	1	0	1	0	0	0
Other	9	6	1	2	0	0
No comment	269	173	13	50	23	10

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

	Total	Agree (strongly / tend to)	Disagree (strongly / tend to)	Neither agree nor disagree	Don't know	No selection
Scope and scale of activities are inadequate / priorities need to be more ambitious	18	6	9	1	0	2
Agree with priorities and activities / support them	17	16	0	0	0	1
Actions lack substance / doesn't sound like anything new will happen	14	7	5	0	2	0
Need more detail on how things will be achieved / need action plan / timelines / targets	12	6	3	2	1	0
Need to integrate into planning policy / need low carbon planning policy	11	6	4	1	0	0

Increase walking and cycling routes / improve infrastructure / join up network	11	5	3	2	0	1
Reduce emissions from public transport / mandate improvements / support electric buses	9	7	2	0	0	0
Improve public transport: quality / frequency / reliability / convenience	9	6	3	0	0	0
Need to increase green infrastructure / tree planting	6	3	2	0	1	0
Active travel isn't an option for all / not everyone can work from home / cars will always be part of the mix	6	2	3	1	0	0
Promote and encourage people to use alternatives to private car / car sharing / mobility on demand	5	3	2	0	0	0
Support IT systems for home working / promote digital meetings / encourage home working	5	1	0	3	0	1
Reduce vehicle access to drive behaviour change / close rat-runs	4	0	1	2	0	1
Consider opportunities from rail freight / reduce freight carried on roads	4	4	0	0	0	0
Tackle the school run / support walk to school schemes / free school bus	4	2	2	0	0	0
Reduce cost of public transport / subsidise bus travel / public ownership of buses	3	1	1	1	0	0
Declare 20mph zones in residential/urban centres	3	0	0	2	0	1
I don't support the priorities or high-level activities	3	0	2	1	0	0
Need to lobby government for funding and tighter regulations / limited funding limits action	3	1	1	1	0	0
Promote benefits of change to residents	2	2	0	0	0	0
Implement zero emissions zones	2	1	1	0	0	0
Consider and address negative impacts from agriculture and maritime	2	2	0	0	0	0
Need to identify action to ensure all homes improve energy efficiency, not just fuel poor etc	2	2	0	0	0	0
Home energy efficiency is complicated and not everyone can make changes / residents need help and incentives	2	1	1	0	0	0
Don't agree with growth priority	2	1	1	0	0	0
Promote use of roof mounted renewables	1	1		0	0	0
Support onshore wind energy	1	1	0	0	0	0
Need to consider costs to the public	1	1	0	0	0	0
Traffic lights have a negative impact	1	0	1	0	0	0
Promote bus lanes	1	1	0	0	0	0
Offer business rate relief to businesses that offer EV charging	1	0	1	0	0	0
Other	13	6	4	2	0	1
No comment	262	186	17	34	13	12

Q11. To what extent do you agree or disagree with the priorities and high-level activities in Theme 3: Towards a sustainable future?						
Total	Agree (strongly / tend to)	Disagree (strongly / tend to)	Neither agree nor disagree	Don't know	No selection	
Actions are not sufficient to deliver scale of change required / actions lack substance	20	10	4	3	1	2
Action needs to be more urgent / these actions need to happen now	17	9	4	2	1	1
Implement zero carbon planning policies / influence Local Plans	15	9	3	2	1	0
Agree with priorities and activities / support them	12	11	0	0	0	1
Need more detail / need action plan / target dates	9	6	0	3	0	0
Theme lacks vision / actions are too limited / random list of actions	8	4	3	0	1	0
Don't support biofuel / wood fuel	8	6	2	0	0	0
Need to support micro renewables and energy efficiency of existing buildings	8	6	2	0	0	0
Need to increase green infrastructure / tree planting	8	2	3	3	0	0
Not achievable without national law / can it be enforced?	7	4	2	0	1	0
Too much focus on electric vehicles / need to support other sustainable transport	7	3	1	1	1	1
Need incentives to switch to EV and renewables for business and residents	3	2	1	0	0	0
All new projects to set out how low carbon has been incorporated	3	3	0	0	0	0
Support new low carbon technology / innovation	3	2	0	1	0	0
Support onshore wind / wave / tidal	3	2	1	0	0	0
I don't support priorities or high-level activities	3	0	3	0	0	0
Introduce anti-idling zones	2	2	0	0	0	0
Support EV charging for residents with no off-road parking	2	2	0	0	0	0
Do not support CNG fuel	2	2	0	0	0	0
Don't agree with growth priority	2	1	1	0	0	0
Need a plan to switch residents from gas heating	1	0	1	0	0	0
Provide training to planners	1	1	0	0	0	0
Do not overlook E-bikes	1	1	0	0	0	0
Need to coordinate investment in renewable energy	1	1	0	0	0	0
Support hydrogen fuelling near ports and motorways	1	1	0	0	0	0
Need to make high polluting goods commercially unviable / tax heavy polluters	1	1	0	0	0	0

"sustainable" isn't quantifiable achievement	1	1	0	0	0	0
Need to ensure homes don't overheat in summer	1	1	0	0	0	0
Public sector shouldn't be funding EV charging infrastructure	1	1	0	0	0	0
Tackle emissions from air travel / shipping / road freight	1	1	0	0	0	0
All schools should support this strategy	1	1	0	0	0	0
Other	14	11	2	1	0	0
No comment	259	191	13	27	16	12

Q12. To what extent do you agree or disagree with the proposed indicators to measure success?						
	Total	Agree (strongly / tend to)	Disagree (strongly / tend to)	Neither agree nor disagree	Don't know	No selection
Need specific targets / milestones / baseline / methodology	25	12	4	8	0	1
Support measures / agree with indicators	15	9	1	4	0	1
Not ambitious enough / urgent enough	12	3	5	1	1	2
Need better air quality monitoring network / air quality measures could be improved / removal of air quality hotspots	12	6	2	4	0	0
Include use of public transport / modal shift to public transport / use of park and ride	11	5	1	5	0	0
Review emissions reduction pledge measure / need progress of councils	9	4	0	5	0	0
Include tree coverage / wetland expanse / tree removal	8	2	3	2	0	1
Include km of cycle lane and footpath improved or built	8	2	1	4	0	1
Include emissions from waste / agriculture / rail / shipping / air travel / waterways	7	5	1	0	0	1
Include walking and cycling / modal shift to walking and cycling / travel plans	7	4	0	3	0	0
Include embedded carbon in goods / carbon footprint / carbon leakage	5	2	2	1	0	0
Review active travel measures / concern about accuracy / scope	5	3	1	1	0	0
Include all greenhouse gas emissions, not just carbon dioxide	4	4	0	0	0	0
Indicators don't matter / data can't be trusted / data will be manipulated	4	1	1	2	0	0
Include number of car share / car clubs in	3	0	0	3	0	0

operation						
Don't waste excessive time and money on monitoring	3	0	1	2	0	0
Include qualitative measures eg. improvement in mental health	3	2	0	1	0	0
Include delays on all roads, not just A-roads	2	2	0	0	0	0
Road delays are caused by factors other than vehicle numbers	2	0	0	2	0	0
Include extent of 20mph speed limit zones	2	1	0	1	0	0
Include more data related to health / illness	2	1	0	0	0	1
Include behavioural change / public perception	2	2	0	0	0	0
Include planning policies / Local Plan policies	2	0	1	0	0	1
Include measures for businesses	2	1	1	0	0	0
Include type of ultra-low emission vehicles eg. number of electric or hydrogen bus / taxi / lorry	1	1	0	0	0	0
Include electric and hydrogen charging infrastructure by district, urban, rural	1	1	0	0	0	0
Include ammonia emissions	1	1	0	0	0	0
Include deaths associated with poor air quality	1	1	0	0	0	0
Include excess summer deaths	1	1	0	0	0	0
Include Display Energy Certificates	1	1	0	0	0	0
Number of homes using smart meters	1	1	0	0	0	0
Include source of domestic heating fuel / number of new homes heated by gas alternatives	1	1	0	0	0	0
Include renewable energy supply	1	1	0	0	0	0
EPCs are not always accurate	1	1	0	0	0	0
Include economic indicators / jobs created / wages	1	0	1	0	0	0
Indicators need to be published / promoted	1	0	0	1	0	0
Other	22	9	8	4	0	1
No comment	247	144	9	60	18	16

Q13. If you have any comments about equalities and / or the Equality Impact Assessment, please provide them here:	
	Total
EQiA is not needed / irrelevant	7
Support or agree with EqlA / important to have level playing field	7
The subject is of equal concern to everyone / shouldn't affect one group more than another	5
EQiA needs to be informed / further consultation by NHS, public health, social services, housing	4
Must reference fuel poverty and unequal access to affordable energy / need to ensure fair policies	4
The strategy is not ambitious enough / will have an unequal detrimental impact on the most vulnerable and young	3
Some solutions are expensive eg. EVs, so policies must not discriminate against less well off	3
Should consider impacts of severe weather (heatwave to flooding) on protected groups	3
Need to ensure those living in rural areas benefit as much as those living in urban areas	2
There is varying level of detail within EqlA, seems confused	1
I don't understand what this means	1
Older people may have problems making decisions about changes	1
Poverty is biggest problem	1
Inequality between people with and without cars has not been considered	1
There aren't enough disabled parking spaces	1
People in inadequate housing need help to have accommodation that meets their requirements	1
Gypsy and traveller communities have specific vulnerabilities which haven't been addressed in EQiA	1
Share with everyone as not everyone has the internet	1
Other	15
No comment	313

Q14. Finally, do you have any other comments to make about the draft Energy and Low Emission Strategy?	
	Total
Needs to be more ambitious / urgent / not sufficient to address scale of issues	67
Supportive of strategy	38
Need milestones / interim targets / action plan	17
Must implement zero carbon planning policies / influence Local Plans	17
Needs to be adequately funded / how will it be funded	15
Need to increase green infrastructure / tree planting	15
Do not support or agree with strategy / strategy is not realistic or feasible	10
Need to improve cycle network / footpaths / integrated network / safer	10
Evidence base doesn't link into strategy enough	1
Need to reference the climate emergency declarations /IPCC / Climate change Act change	4
How will it be enforced / monitored	9
Must increase energy efficiency / renewables on existing buildings	3
Must improve public transport / make it cheaper / more attractive	7
Encourage more working at home / video conferencing	1
Involve communities / action groups / NGOs / academics in developing plans	8
Need to reduce volume of traffic	5
Difficulties in switching to EVs / switching from private cars	5
Need to raise awareness / change culture / change behaviour / incentives	13
Air pollution around schools should be a priority	2
Need to work in partnership / must secure buy-in politicians / business	10
Should be called Kent strategy / Medway is part of Kent	1
Don't support biofuels / solar farms on agricultural land	2
Not enough inclusion of Medway	1
Don't agree with growth / no more building	6
Other	42
No comment/ no further comment	178