

Kent Environment Strategy *A Strategy for Environment, Health and Economy*

Consultation Report January 2016



Produced by: Kent County Council, Sustainable Business and Communities

Contact: Adam Morris
adam.morris@kent.gov.uk

Executive Summary

The previous Kent Environment Strategy (KES) ran from 2011 to 2015 and delivered multiple partnership projects and outcomes, which are detailed through the revised Kent Environment Strategy monitoring and Climate Local Kent reports available on Kent County Council's website¹. In light of the strategy coming to an end and with significant changes in Central Government, both at Ministerial and policy level, a refresh has been undertaken with partners, resulting in the development of the *Kent Environment Strategy: A strategy for environment, health and economy*.

The draft strategy was open for public consultation between 27th July and 25th September. The consultation was promoted through a press release; social media accounts (KCC's corporate and Explore Kent's Twitter accounts) and targeted emails to key networks and stakeholders. Parallel to the consultation, the strategy has been presented to senior management teams across all Districts and Borough councils and many key stakeholder groups. All documents were made available through www.kent.gov.uk/kesconsultation.

Just over 100 responses were received; 51 from individuals and the remainder from organisations representing public, private and voluntary sectors including the Environment Agency, National Farmers Union, Country Land and Business Association, NHS, Kent Wildlife Trust, Kent Nature Partnership and Kent Association of Local Councils (as well as seven Districts and Boroughs).

From those who completed the online questionnaire, the majority of respondents "strongly agreed" or "agreed" with the priorities identified for each theme (ranging from 78% to 81% of respondents).

The responses from the consultation have provided a wealth of further information that can be integrated into the strategy, Kent State of the Environment report (evidence base) and implementation plan. Feedback from the consultation has been incorporated into the final draft of the strategy.

Some specific areas that were raised across responses are listed below:

- **Balance of priorities in relation to development:** This is the most strongly and frequently made concern that was raised across respondent types, primarily in relation to the pressures of increased housing growth on infrastructure, and in particular, on transport networks, water and energy resources, natural environment and landscape.
- **Links between strategies, plans and partner roles:** There was significant feedback requesting clarification on how links will be made between strategies, local plans and where the Kent Environment Strategy fits into these. In addition, respondents were keen to see how they could play a role in delivery of the priorities.
- **Influencing national Government and bodies:** There is widespread concern that national policy is not providing sufficient incentives or resources for delivery of the priorities identified by the KES. Many respondents expressed concern that, in some cases, Government policy is moving away from effectively supporting energy

¹ <http://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kent-environment-strategy>

efficiency and generation, low carbon development and long term resilience to severe weather and climate change.

- **Agriculture, forestry, viticulture and horticulture:** Multiple respondents felt that the growing importance of these sectors and their role in our economy and the health and resilience of the county is not fully realised.
- **Biodiversity:** In Kent we have not met our Biodiversity 2010 targets and with biodiversity continuing to decline, it is likely that we will also fail to meet our Biodiversity 2020 targets without targeted interventions. It was felt that this was not fully realised in the strategy.
- **Sustainable Transport options:** A conflict was seen by respondents between priorities to reduce car travel and what is perceived as a lack of investment in affordable public transport options, particularly in rural areas. It was also felt that the targets and indicators in this area are weak.
- **Noise pollution:** The issues and impacts surrounding noise pollution are an omission in the current draft of the strategy and this was raised by a number of respondents, with a particular focus from those in the area impacted by air traffic for Gatwick Airport.

Table of Contents

Executive Summary	2
1.0 Introduction:	5
2.0 Consultation process:	6
3.0 Consultee Responses and Feedback	6
3.1 Overall structure of the strategy	7
3.2 Theme 1 consultee responses and feedback	10
3.3 Theme 2 consultee responses and feedback	13
4.1 Theme 3 consultee responses and feedback	17
4.2 Targets and indicators consultee responses and feedback	18
4.3 Additional comments on the strategy	23
5.0 Equalities review	25
6.0 Next steps	27

1.0 Introduction:

The purpose of this document is to provide a summary of the comments provided through the consultation of the revised Kent Environment Strategy and to provide feedback as to how these comments have been addressed.

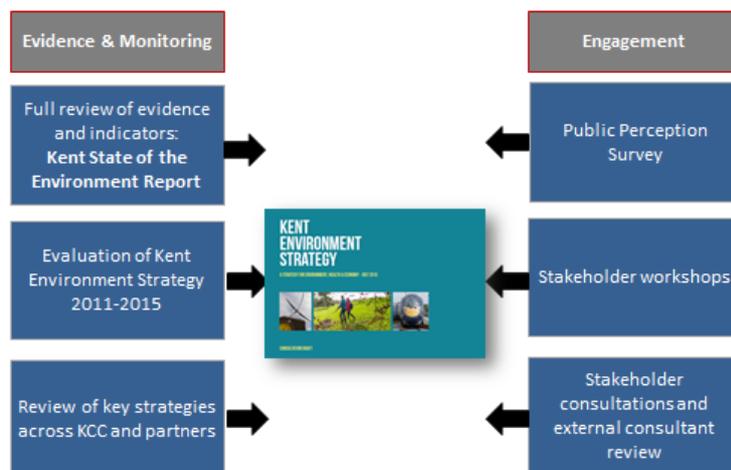
The previous Kent Environment Strategy ran from 2011-2015, delivering multiple partnership projects and outcomes². In light of the strategy coming to an end and significant changes in Government, at both Ministerial and policy levels, a refresh has been undertaken, resulting in the *Kent Environment Strategy: A strategy for environment, health and economy*.

The vision of the strategy is that *Kent is benefitting from a competitive, innovative and resilient economy, with our natural and historic assets enhanced and protected for their unique value and positive impact on our society, economy, health and wellbeing*.

Through the ten strategic priorities identified through stakeholder meetings and workshops, the strategy seeks to support:

- Residents to have a high quality of life, saving money in warmer, healthier homes and benefitting from the many services provided through natural and historic assets, both within communities and across the county.
- A competitive and resilient economy, with business innovation in the rural economy and low carbon and environmental services sector driving economic growth.
- Communities and businesses in saving money through resource efficiency, whilst preparing for severe weather and its impacts through an increased awareness of environmental risks and opportunities.
- Public sector partners saving money through evidence-based commissioning, strong partnership working, resource efficiency and avoiding future costs through increased resilience to environmental change.

A summary of the process for development of the strategy is given below:



² <http://consultations.kent.gov.uk/consult.ti/KESconsultation/consultationHome>

The strategy will form one of a suite of strategies across Kent County Council (KCC) and partners and these will interlink as appropriate to prevent duplication.

As a partnership document, it is anticipated that the strategy will be taken through partner organisations' decision making processes with a view to launch the final strategy in Summer 2016.

In addition to the consultation on the Kent Environment Strategy, a wealth of further data, information and feedback has been provided to support the evidence base *Kent's State of the Environment*. This will be incorporated into an update of the report alongside a full review of the targets and indicators during 2016/17.

2.0 Consultation process:

The public consultation on the proposed strategy took place from 27th July 2015 to 25th September 2015. The process for consultation was endorsed by the Environment and Transport Cabinet Committee on 21st July 2015 and this report provides a summary of comments from the consultation and wider stakeholder engagement and how they have been reflected in the final draft that has been proposed for adoption and/or endorsement as appropriate.

The consultation website was emailed to business, community, voluntary and public sector networks, identified through stakeholder engagement in relation to the strategy and previously known networks.

The press release for the launch of the consultation was delivered to over 200 Kent media and planning bodies. In addition, the consultation was promoted through social media through Explore Kent, Low Carbon Kent and KCC Twitter accounts.

All documents were made available through www.kent.gov.uk/kesconsultation including the evidence base underpinning the strategy (Kent's State of the Environment) and the Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). A full Equalities Impact Assessment (EqIA) was carried out and made available on the website along with a MS Word version for people with audio transcription software. No alternative formats were requested during the consultation period.

Responses were received from both individuals and networks with representation from across public, private and voluntary sectors.

3.0 Consultee Responses and Feedback

Feedback was requested via an online form provided on the consultation website or through direct contact with the team either through email, letters or through meetings. There was a fairly equal distribution between these methods of response.

It is important to note that the summary statistics provided in this report (including those from the equalities questions) only represent responses gathered through the online questionnaire and so do not cover the full range of feedback.

Comments have been grouped where multiple respondents provided similar feedback, and so direct quotations are not used in this report. The ability to provide further comments through the questionnaire on each question were only enabled if respondents “strongly disagreed” or “disagreed” with the question. However, this has been challenged by a number of respondents who would like to have had the opportunity to provide further comments regardless of selection and is something that we will seek to ensure is enabled in future consultations.

3.1 Overall structure of the strategy

A number of questions were asked on the overall structure and language of the Kent Environment Strategy (KES). The following provides a summary of those responses.

Question: *Was the strategy easy to understand?*

Response category	Percentage responses*
Strongly agree / Agree	52%
Neutral	32%
Strongly disagree / Disagree	16%
Don't know	No responses

*Response number: 56 (only representing those who provided feedback via the online questionnaire)

Responses were equally distributed between those who felt the strategy was too long and those who felt more detail was needed. Most respondents felt the strategy was easy to understand but a number fed back that some wording was seen as only understandable to those working in the sector or experienced in Local Authorities. It was felt that a glossary would support the reader and greater clarity was requested on how the priorities will be delivered and resources allocated to the work.

In response a glossary has now been incorporated into the strategy. As the strategy covers a broad range of priorities and challenges, it is felt that cutting back further would lose some of the information that respondents and stakeholders requested.

In terms of greater clarity, details of delivery of the strategy will be incorporated into the implementation plan, which is currently in development across partners. It is recognised that this was not clearly described within the consultation draft and so additional reference has now been made to the implementation plan throughout to clarify the process and links.

The following text provides summaries of those further comments received where consultees have ‘disagreed’ or ‘strongly disagreed’ with questions relating to the strategy’s themes and priorities.

Question: *If you have answered ‘disagree’ or ‘strongly disagree’ that the relevant environmental policy has been taken into consideration’, please tell us why.*

This question was seen as unclear and so gathered many mixed responses which were drawn out further in other sections and so not re-iterated here.

Response summary	Strategy update
AONB ³ Management Plans appear not to be clearly referenced	Reference to these plans has been increased in the strategy
The importance of conserving landscape character and local distinctiveness appears missing from key theme targets and indicators	This has been strengthened in the strategy text. However, further work is needed with the Kent Landscape Group to establish activities and this will form part of the implementation plan.
The balance between drive for increased growth and sustainability needs to be addressed	This relates to a number of the KES priorities and so is addressed later. However, planning and land-use was the most referred to issue in all feedback received and so the strategy has increased references to sustainable development throughout.

Question: *If you have answered ‘disagree’ or ‘strongly disagree’ that the themes cover the main concerns for the environment, please tell us why.*

Response summary	Strategy update
There is a gap in relation to noise which needs to be incorporated	The final strategy now incorporates noise into text and priorities in Themes 1 and 2.
Bio-conversion should be considered as an alternative to burning of waste	Further research needed on this and so will align to Theme 1 and be integrated into the Implementation plan.

Question: *If you have answered ‘disagree’ or ‘strongly disagree’ that the priorities are realistic, please tell us why.*

Response summary	Strategy update
A number of respondents fed back that a growing population and lack of, or investment in, infrastructure to support that growth makes some priorities unachievable.	Greater reference to challenges and opportunities for sustainable growth has been incorporated throughout.
Many respondents expressed concern that resources are not available to deliver the priorities, particularly in light of national policy and budget cuts	A full analysis of resources will form part of the implementation plan. It is likely that there will be gaps in resourcing and in recognition of this Theme 1 seeks to identify funding opportunities and

³ AONB: Area of Outstanding Natural Beauty

Response summary	Strategy update
	improved collaboration to minimise resource pressures.
There is a greater need for behaviour change activities across the strategy to support delivery of the priorities. This should be tailored to the relevant audiences	Theme 1 has been updated to incorporate the range of audiences. This will also be addressed through the actual activity of the implementation plan.

Question: *If you have answered 'disagree' or 'strongly disagree' that the priorities are ambitious', please tell us why.*

From all feedback received, this question received the most neutral responses, with many feeding back that they see the priorities as “realistic” rather than “ambitious”. There was an appetite from a number of respondents for the priorities to be more ambitious in some areas, and so these have been integrated into feedback in the relevant sections. In addition, multiple respondents would like to see partners become more active in influencing Central Government and other national bodies to support delivery.

With regards to influencing Central Government and national bodies, Theme 1 of the strategy includes priorities for understanding our risks and opportunities from environmental change and using that evidence base to inform and influence relevant policy and decision makers. This has been strengthened in the text. Theme 1 also now includes priorities for changing behaviour across all sectors and socio-economic groups, tailoring and targeting communications as appropriate.

There were also some comments on the following:

- **The need for low-emission zones and greater deployment of cycle lanes and low emission busses:** both of these are transport related, specifically to Theme 2 and priority 7 “Support sustainable access and connectivity for businesses and communities”. The KES is being communicated and linked into relevant transport strategies, such as the Local Transport Plan 4 (LTP4).
- **The need for much more renewable energy:** energy consumption and generation are one of our challenges, particularly a need to diversify the county’s energy mix, of which renewables play a part, to ensure we have a secure and resilient supply and that we are using energy efficiently across all sectors to manage demand. Whilst Theme 2 includes priorities on energy efficiency, Theme 3 priority 8 is about ensuring that such challenges and the opportunities they bring are informing plans, policies and decisions. The implementation plan will further detail how we can support this.
- **There is a need to allow waste to be utilised:** as with transport, the KES is being communicated and linked into relevant waste strategies. Further work is required within this area however and will take place through the implementation plan. Circular economy is a potential area that can support the reduction of waste and preserve the value of resources and materials through application of re-use, re-manufacture and repair business models and applies to both products and services.

This is linked to Theme 3 priorities and will be taken forward through the implementation plan.

3.2 Theme 1 consultee responses and feedback

A number of questions were asked on the priorities for Theme 1. The following provides a summary of those responses.

Question: To what extent do you agree or disagree with the Priorities in Theme 1?

Response category	Percentage responses*
Strongly agree / Agree	70%
Neutral	22%
Strongly disagree / Disagree	4%
Don't know	4%

*Response number: 54 (only includes those who responded via website)

Response summary	Strategy update
Greater influencing of Central Government and national bodies is requested to address environmental concerns	This is a key priority for Theme 1 of the strategy, specifically through sub-priority 2.2. Through this we will establish mechanisms to increase influencing in partnership.
Fuel poverty is not currently mentioned within the strategy	This has now been included in Theme 2 sub-priority 6.2 and the narrative. In addition, the development of a Kent Fuel Poverty Strategy will form part of delivery of the implementation plan.
We need to maximise funding opportunities which can be beneficial to all areas of service. Possibly provide a central bid section for future resources.	This is a key aspect of delivery of Theme 1 and sub-priority 3.2 and so has been clarified.

Question: To what extent do you agree or disagree with the sub-priorities in Theme 1?

Response category	Percentage responses*
Strongly agree / Agree	67%
Neutral	20%
Strongly disagree / Disagree	7%
Don't know	5%

*Response number: 55 (only includes those who responded via website)

Response summary	Strategy update
There were some specific comments relating to the air quality priority, in particular in relation to level of ambition and that our	Sub-priority 1.5 has been updated and more information on the impacts of noise

Response summary	Strategy update
understanding of the associated health outcomes need also take noise into account.	will be integrated into the narrative. Activities to support will be included in the implementation plan. In addition, links across the themes will be improved as many priorities will support air quality objectives.
Sub-priority 1.4 should include cropping land as a specific resource constraint, as it is finite, under threat from development and infrastructure needs, and especially at risk from climate change.	Land constraints have been included in sub-priority 1.4 and are now further referred to in the narrative of the theme and challenges. Other resource constraints highlighted will be reviewed and incorporated into the implementation plan as appropriate.
The forthcoming <i>Natural Capital Assessment for Kent</i> should include data on the amount, relative quality and location of farmland in Kent and its economic value in terms of jobs directly and indirectly supported (including contracting, food processing, transport, farm machinery, and storage), carbon sequestration and local food production/reduced food miles.	This feedback will be incorporated into the project development.
Good examples and best practice examples need ideally to be communicated, and communications to be updated regularly.	This will reviewed as part of sub-priority 3.3 which is to “Develop an environmental communications and engagement strategy, improving awareness of priorities and supporting behaviour change”

Question: Are there any other comments you would like to make in regards to Theme 1?

Response summary	Strategy update
Unclear where the KES sits with other strategies and plans across Kent and Medway. There is a degree of duplication as some priorities are already well established in other plans.	A stronger reference to links with other strategies and plans has been incorporated into the final draft of the strategy with additional pages added.
The importance of understanding the people and mechanisms for managing landscapes appears to be missing.	Multiple respondents have requested clarity of roles and mechanisms for delivery across priorities and so this has been highlighted in the strategy and will be integrated into the implementation plan.
Request recognition is given to climate change related issues including health problems from flooding and insect borne and	Some of this is covered in Theme 3 but will also be integrated into Theme 1 narrative and Implementation plan

Response summary	Strategy update
infectious disease spread associated with warmer/extremes of weather as well as flooding	
Need to involve financial investors in discussions	This will form part of Theme 1 and incorporated into the implementation plan
Consideration is needed of divestment from fossil fuels across public sector partners	This will be reviewed with Finance and Pension teams.
Agriculture/forestry/viticulture/horticulture employs more than 46,000 people in Kent, however it is not mentioned or acknowledged	Greater reference to these sectors are now incorporated throughout the final draft of the strategy
Consideration is needed of the impacts on biodiversity of the new Countryside Stewardship Scheme.	Future impacts of reduced opportunities for incorporating biodiversity into farm businesses will need to be reviewed and so incorporated into Theme 1 (sub-priority 4.2) and the implementation plan as appropriate
Concerns have been raised that emphasis is placed on understanding problems we should already be well aware of through the previous strategy	This review aims to only address those areas where there is still a gap in understanding, not where evidence already exists and has been developed previously. It therefore draws on learning through the State of the Environment report to identify priorities for further research to ensure an evidence base for action. Where the evidence already exists, priorities have been developed through Themes 2 and 3.
Air pollution in some areas in Kent is seen as a major issue. Opportunities for alternative accommodation and movement of freight should be explored	A review with Transport Strategy team and link to transport strategies and implementation plan will be undertaken as appropriate. Movement of freight has been incorporated into the text of the strategy.
It was suggested that opportunities should be explored to support awareness raising and training for elected Members	Through the implementation plan, and sub-priority 3 we will develop activity around knowledge networks, sharing best practice and training to build capacity amongst different stakeholders and sectors. In addition an Informal Member Group has been established who can support this further.
There needs to be an analysis of space of	This will be incorporated into the activities

Response summary	Strategy update
high environmental or landscape value to ensure that new developments are focussed in the right areas	underpinning priorities 5.1 and 5.2 of Theme 2.
The wording of the themes, priorities and sub-priorities is confusing in places with some sub-priorities reading as actions.	Review with stakeholders has fed back that 'sub-priorities' is a preferred wording to 'action', however greater clarity of the links between the strategy, evidence and implementation plan has been integrated into the final strategy.
The voluntary sector is a major resource and is a source of specialist knowledge and skills; they could provide capacity development support for the strategy. There are opportunities to maximise volunteering by attracting external funding to help deliver the strategy. Much of the available funding is targeted at community / voluntary groups.	Theme 1 and the introduction have been updated to better reflect the importance of the voluntary sector in delivery of the strategy

3.3 Theme 2 consultee responses and feedback

A number of questions were asked on the priorities for Theme 2. The following provides a summary of those responses.

4.0 Question: *To what extent do you agree or disagree with the Priorities in Theme 2?*

Response category	Percentage responses*
Strongly agree / Agree	74%
Neutral	14%
Strongly disagree / Disagree	8%
Don't know	4%

*Response number: 50 (only includes those who responded via website)

Response summary	Strategy update
Consideration of appropriate public transport needs to be included in planned development for the county	This will be reviewed to identify challenges and opportunities for integration into the implementation plan and associated strategies as appropriate.
Concern has been raised on the potential impacts of water metering.	Review water metering approach and activities of Water Task Group to ensure that activities in the implementation plan are effective and achievable
A timescale for delivery of the strategy would be beneficial	The implementation plan will detail the timescales for delivery of individual

Response summary	Strategy update
	activities. Greater reference to the implementation plan has been incorporated into the final draft.
To make best use of resources we need to be thinking about designing into the built environment ways which support people to make the right choices	The importance of design has been strengthened throughout the strategy with key actions integrated into the implementation plan for Theme 3.
Priority 6 should cite land as well as energy and water in terms of improving our resource efficiency	Priority 6 has been updated to include land

Question: To what extent do you agree or disagree with the Sub-priorities in Theme 2?

Response category	Percentage responses*
Strongly agree / Agree	67%
Neutral	20%
Strongly disagree / Disagree	8%
Don't know	4%

*Response number: 49 (only includes those who responded via website)

Response summary	Strategy update
General comments	
A number of comments were raised on the figures used in the infographics.	Corrections have been made to the infographics.
'Work with', 'support' and 'improve'. These terms need to be stated more strongly with resources and powers given to the relevant agencies and those powers acted upon.	Feedback has been mixed between wording being too strong and/or too weak. A review of all wording has been undertaken and updated where possible.
What role do KES partners play in delivery of other strategies?	Links to other strategies have been incorporated into the final strategy
There needs to be consideration for education for the public and other sectors on environmental concerns	This is addressed in Theme 1 but has been strengthened.
Consideration for further developing more links to District Councils' policies, particularly on housing growth, loss of green space, pressure on landscapes and land use changes	Successful delivery of the strategy certainly requires these links to be made. This will form part of the continued engagement at all levels for development of the implementation plan.
Theme 2 appears to accept the minimisation of negative impacts as a first step, when in fact there is a legislative and policy principle to avoid damage wherever possible.	The wording of the title of Theme 2 has been updated to recognise avoidance first and so is now: <i>Making best use of existing resources, avoiding or minimising negative</i>

Response summary	Strategy update
	<i>impacts.</i>
Natural and Historical Resources and Assets	
Priority 5.1 includes wording on improving our understanding of the natural and historical features underpinning landscape character. Should this be a Theme 1 priority?	The wording of the priority has been amended and the term 'understanding' has been removed. Amendments made to reflect that this is an action orientated sub-priority.
There were some comments regarding the need to include agricultural related facilities and features into the narrative on our natural resources and assets	Amendments have been made to the narrative and priority wording.
Sub-priority 5.4 should include the active preservation and enhancement of agricultural soils, especially those suitable for cropping.	This has been integrated into the narrative of Theme 2 and will be further developed through the Implementation plan
It was noted that despite being a coastal county there is minimal mention of the coast or marine environment	Coastline and marine environment has been integrated across the strategy, and Priority 5.2 updated to include functional habitat networks across land and sea.
<p>A number of comments were made relating to water quality and resources. These included:</p> <ul style="list-style-type: none"> • On-farm water storage should be supported through the planning process as a way to address water scarcity and flood risk; • Consideration could be taken for water companies to implement mains water drainage for communities where it does not currently exist; • Due to the poor quality of rivers in Kent it was raised that further enforcement developments are required; • 	<p>These comments have been taken into account. The narrative of Theme 2 has been updated accordingly and a review of opportunities to develop some of these comments/suggestions will be explored through the implementation plan.</p> <p>Some of the top concerns to come out of the Kent Water Spatial Risk Assessment (2013) have been integrated within Theme 2.</p>
Resource efficiency (energy, water and land)	
Unconventional gas/oil should be mentioned within the strategy as a key issue for Kent	<p>Any applications for oil and gas exploration or exploitation are reviewed on a case-by-case basis through the planning process.</p> <p>KCC and partners have developed a briefing note specifically on unconventional gas.</p>
The industrial and commercial sector, which includes businesses, contributes a third of the county's CO ₂ emissions. It is not clear then as	The narrative for Theme 2 has been slightly amended. We are working with

Response summary	Strategy update
to why the sector is included only as a sub-priority (6.2).	businesses through the STEM ⁴ scheme to try and reduce business related emissions. Further initiatives and opportunities will be explored as part of the implementation plan.
It was felt that a number of decisions made by Central Government directly impact the ability to deliver projects relating to the domestic sector e.g reducing in the FiTs ⁵ scheme.	The strategy has been updated to further define challenges. Theme 1 incorporates priorities to review changing policies and funding opportunities for example, these will be part of any project development.
It would be worthwhile to incorporate opportunities for improving the use of empty housing.	Empty housing could provide a significant opportunity and will be reviewed as part of the implementation plan.
ISO 50001 should be considered as an important standard alongside ISO 14001. ISO 50001 is concerned with energy management whilst ISO 14001 is concerned with environmental management systems.	This relates to a specific project supporting SMEs in Kent. Delivery of the project forms part of the implementation plan and as this is rolled out more widely ISO 50001 will be incorporated as appropriate for the businesses engaged.
Transport and accessibility	
<i>Growth without Gridlock</i> and the <i>Coastal and Countryside Access Improvement Plan</i> are grouped together as key transport strategies but these documents have very different purposes. There needs to be a mention of the statutory Local Transport Plan and the newly emerging Active Travel Strategy which supports the comments about active travel and forms an action/deliverable.	The narrative for Theme 2 has been updated to reflect these comments and activities incorporated into the implementation plan.
Reduction in travel through sustainable and other transport options has not been mentioned, such as car share schemes, park and ride and use of electric vehicles.	Priority 7.2 has been updated to include sustainable travel. Further specific comments that were provided have been forwarded to the relevant transport teams.
It was suggested that the ecological value of linear habitats, such as road verges, railways and motorways, as corridors for dispersal of species (both flora and fauna) between fragmented habitats and supporting pollinators should be included in this strategy.	Opportunities will be reviewed as part of the implementation plan and wording has been updated in the strategy.

⁴ STEM: Steps to Environmental Management

⁵ FiT: Feed-in-tariff

4.1 Theme 3 consultee responses and feedback

A number of questions were asked on the priorities for Theme 3. The following provides a summary of those responses.

Question: *To what extent do you agree or disagree with the Priorities in Theme 3?*

Response category	Percentage responses*
Strongly agree / Agree	77%
Neutral	13%
Strongly disagree / Disagree	6%
Don't know	4%

*Response number: 48 (only includes those who responded via website)

To what extent do you agree or disagree with the sub-priorities in Theme 3?

Response category	Percentage responses*
Strongly agree / Agree	64%
Neutral	26%
Strongly disagree / Disagree	6%
Don't know	4%

*Response number: 47 (only includes those who responded via website)

Response summary	Strategy update
General comments	
An aspect of educating the youth to create long term behaviour change needs to be factored in.	This has been included within the narrative of Theme 1 and priority 3
The outcome of Theme 3 needs to address not just risk but impacts and opportunities	The outcome of Theme 3 has been updated
Manufacturing has not been mentioned throughout the strategy	This is something that will be investigated as part of the implementation plan
There is concern that this should not be seen as a barrier to planning	The strategy is addressing the need for sustainable growth with a balance between social, economic and environmental objectives. It seeks to provide mechanisms to support planning decisions, recognising the need for sustainable growth in Kent and Medway. This is key to delivery of Theme 3.
There were a number of typographical errors on the figures and charts used in Theme 3	These have been updated
Influencing future sustainable growth	
A number of transport related comments were made: <ul style="list-style-type: none"> Transport strategy should include a proactive plan to repair and resurface road surfaces as distinct from the more prominent reactive plans 	These comments have been forwarded on to the Transport Strategy team

Response summary	Strategy update
including find and fix; <ul style="list-style-type: none"> Active addressing of solutions in terms of facilities for lorry parking during Operation Stack were raised 	
It was felt that although Central Governments no longer require all new homes built after 2016 to be carbon neutral, Kent partners should continue to work to ensure that all new developments are carbon neutral.	Without supporting policy this is difficult to deliver but Theme 1 seeks to influence Government and Theme 3 looks to provide guidance and support as to the multiple benefits of sustainable design and implement measures to support this wherever possible.
Improving the County's resilience	
Are alternative mechanisms, beside hard defences, being reviewed as part of flood risk management	All potential opportunities for flood risk management will need to be conducted as part of the implementation plan and wider partnership activity
The impact of flooding, both fluvial and especially coastal on the county's farmland needs to be highlighted. Climate change-induced events and severe weather could have severe impact on the county's farming industry, local food production, local jobs, and the long-term health of the soil itself.	The narrative of Theme 3 has been updated to reflect this
The case studies refer to the online healthcare toolkit and the SuDs ⁶ guidance – it would be helpful for the web links to these to be included in the strategy	Relevant weblinks for all of the case studies have now been included

4.2 Targets and indicators consultee responses and feedback

A number of questions were asked on the strategic targets and indicators. The following provides a summary of those responses.

Question: *To what extent do you agree or disagree with the targets and indicators?*

Response category	Percentage responses*
Strongly agree / Agree	62%
Neutral	19%
Strongly disagree / Disagree	18%
Don't know	2%

*Response number: 47 (only includes those who responded via website)

⁶ SuDs: Sustainable Drainage Systems

The majority of responses strongly agreed or agreed with the targets and indicators proposed for the strategy, however there are some significant gaps where data is not available. Monitoring in a number of areas has also been cut back on a national level as part of austerity measures. Whilst some of the targets and indicators adopted were developed and agreed as part of Climate Local Kent in 2012, a number of these are under review whilst others are being developed which will form activity under the implementation plan.

General comments received on the targets and indicators say that they should reflect the challenges set in the strategy and be evidenced based, referring specifically to using the State of the Environment report which underpinned the strategy’s development. Concern was raised on resources for monitoring indicators around whether costs have been built in and how that information and data will feed back into partner’s decision making processes. There was also some appetite for being more ambitious with the targets and indicators, particularly in renewable energy, sustainable building and transport and development and skills. It was also indicated that the current target profiles do not reflect matters concerning rural land, the rural economy and local food production. In refreshing or developing new targets and indicators they need to be SMART in terms of being Specific, Measurable, Attainable, Relevant and Timely.

There are specific priorities built into Theme 1 for monitoring and evaluation and using that information and data to inform partners and other interested stakeholders. The activity itself will form the work of the Implementation plan, part of which will be to assess the viability of a data hub to support the facilitation of monitoring and dissemination of relevant KES information and data.

There were a number of additional milestones, indicators and targets suggested through the consultation responses, these will be considered as part of the implementation plan as part of a review of measuring success and performance. These additional comments are detailed below.

Response summary	Strategy update
Energy	
It was commented that the current 10% renewable energy target is too low and unclear as to which sectors this applies to.	<p>The existing energy target of 10% electricity from renewables has come from the Climate Local Kent (CLK) targets; it is based on a study into the potential capacity of Kent for onshore renewable energy. The target has however been revised to a minimum of 15% of energy generation in Kent will be from renewable sources by 2020 from a 2012 baseline.</p> <p>The aim is to work in partnership across sectors to address public and private, domestic and transport sector emissions.</p>
Utility companies could demonstrate and evidence the contribution that they are making	This is something that could be investigated through the implementation

Response summary	Strategy update
in supporting environmental and wider socio-economic outcomes	plan e.g. engaging with the water authorities and energy brokers and suppliers.
Water	
The water use target is to reduce water use from 160 to 140 litres per person per day. However the new national standard (published after this consultation began) sets a mandatory standard of 125 litres per person per day in the building regulations with an optional requirement of 110 litres.	The 140 litres refers to exiting households; this was originally introduced through the Climate Local Kent commitment and is likely to be reviewed as part of the KES Implementation plan. The revised national standard refers to new properties and so measures can be introduced that will support that target.
Natural and heritage assets	
<p>There were a number of recommended amendments to targets, specifically on:</p> <ul style="list-style-type: none"> • Local Wildlife Sites (LWS); • Marine targets, and • Status of bird species. <p>The following were also suggested:</p> <ul style="list-style-type: none"> • Inclusion of a target to reduce the annual loss of high-quality farmland to development (by prioritising development towards areas of lower-quality land wherever possible) • Inclusion of a target to prevent an increase in the area of high-quality farmland that is vulnerable to flooding (by maintaining flood defences that protect such land). • Inclusion of a target to increase the volume and value of food grown in the county • Inclusion of a target to reduce the total food miles of food sold in the county • Inclusion of a target and indicator for green spaces and spaces for recreation since these areas are included in the strategy. • Targets for natural and heritage assets in the form of a commitment to ensuring planning and policy decision making includes a proper understanding of landscape character. <p>Below are some suggestions or comments on targets for landscape and greenspace:</p> <ul style="list-style-type: none"> • In order to achieve the current landscape priority, sub-priority 5.1, the partnership needs to sign up to a joint target such as 	<p>Targets have been amended according to comments received. With regard to other comments information has been forwarded to relevant teams or organisations and further discussion with the Kent Nature Partnership and Produced in Kent will be undertaken as part of the Implementation plan.</p> <p>These details will be put forward to the KNP as part of the review of indicators, targets and milestones for the implementation plan. Those currently</p>

Response summary	Strategy update
<p>“to produce a county-wide map of landscape character”. The indicator could be something like number of Districts using this during local plan making or similar.</p> <p>Inclusion of a new indicator relating to access to, and provision of, natural green space. This should be based on the KNP⁷ working group work looking at deficiencies across county.</p> <p>Species target – it has been suggested that bats may be a valuable indicator.</p>	<p>listed are proposals put forward by stakeholders such as the KNP and Kent Wildlife Trust.</p>
Sustainable transport and accessibility	
<p>There were a number of comments regarding sustainable transport and accessibility. Many of the target indicators are focused on travelling; a reduction or non-increase of traffic movement might also be useful or realistic.</p> <p>Specific comments below:</p> <ul style="list-style-type: none"> • There are currently no measurable targets included. Comments received suggest that targets need to be set for modal shift away from motor vehicles and more toward active travel e.g. cycling and walking. • Inclusion of targets for car sharing. • Revision of fares for under 18 year olds including the Freedom Pass. • There is no inclusion of targets for cycle lane development. <p>Reduction target for overnight lorry parking in East Kent</p> <p>An example target could be something like: "by 2020 create the conditions to facilitate at least 36% of primary school pupils and 22% of secondary school pupils to walk or cycle to school as their main mode of transport" or "by 2020 create the conditions to facilitate a 10% drop in the number of car journeys under 5 miles long".</p>	<p>The detailed comments have been forwarded onto relevant transport teams and the suggested targets will form part of the review aligned to Theme 1 priorities.</p>
Skills	
<p>Inclusion of a target to increase the number of people involved in food production as an out-of-work activity, whether at home, in allotments or in community gardening schemes.</p>	<p>Targets will be needed and will be reviewed as part of the implementation plan</p>

⁷ KNP: Kent Nature Partnership

Response summary	Strategy update
Health and Wellbeing	
<p>There are 40 Air Quality Management Areas (AQMA) where recommended maximum EU levels have been exceeded in Kent, a target relating to meeting these levels would be valuable</p>	<p>The Kent and Medway Air Quality Partnership (KMAQP) are represented by district level air quality officers and KCC. They will through Theme 1 and Theme 2 be working on understanding how they can support those AQMAs. Activity will be recorded in the implementation plan and subsequent monitoring report.</p>
<p>It was recommended that noise should be included in the indicators relating to road, rail and air transport; this is in addition to air quality.</p> <p>It was noted that noise contours (day and night) are produced by the Department for Transport (DfT) for summer and winter seasons. Although the noise contours do not extend into Kent from Gatwick, other noise metrics need to be considered.</p>	<p>Indicator has been updated in the strategy and the information forwarded to the relevant transport teams.</p>
<p>There were a number of comments relating to fuel poverty and retrofitting work. They focussed on whether should we have a fuel poverty target that is in line with what Central Government is proposing: <i>“To ensure as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band C by 2030”</i>.</p> <p>There is a fuel poverty strategy currently in development which includes the following draft priorities:</p> <ul style="list-style-type: none"> • Kent target - to understand who and where our vulnerable residents are and how best to help them • We will work to collate relevant data sets to enable us to clearly identify the most vulnerable residents who are at risk of fuel poverty • We will work in partnership to identify resources to help us deliver programmes that tackle fuel poverty; starting with the most vulnerable residents (resources include partners, staff time, funding etc.) • We will work in partnership to identify programmes to effectively support people in fuel poverty. 	<p>The Kent and Medway Sustainable Energy partnership (KMSEP) and Kent Energy Efficiency Partnership (KEEP) represents local authorities and landlord associations in Kent and Medway. They have been working with Energy Company Obligation (ECO) funding to deliver retrofitting measures to homes that are fuel poor; associated target for this work has now been included in the Kent Environment Strategy.</p> <p>Further work with the Public Health team in particular will be taking place over the next year and will be documented in the implementation plan through a Fuel Poverty Strategy for Kent and Medway that is currently under development.</p>
<p>There could be inclusion of specific aims of enabling local people to engage in active outdoor pursuits and sport.</p>	<p>A review of existing targets for outdoor activities will form part of the implementation plan</p>

Response summary	Strategy update
Including a target to work with and educate younger persons would be important as they represent the long term decision makers in the county.	This forms part of priority 3 under Theme 1: <i>Building resources, capabilities and changing behaviour</i> . However, targets for the whole strategy are under review as part of the implementation plan.

4.3 Additional comments on the strategy

Consultees were asked if there were any further comments that they would like to provide with regard to the revised Kent Environment Strategy. A summary of those comments are provided below.

Response summary	Strategy update
The strategy has a partnership approach so the delivery will also be via the County Council, district authorities, stakeholders and partners. The role of the various stakeholders and partners to deliver the strategy needs to be clarified	Roles and responsibilities will be clarified through development of the implementation plan, which is currently underway. Stakeholders will be further engaged to finalise the plan early 2016.
As the Environment is a broad issue and cuts across many areas of work there is a need to ensure alignment where possible, both within the strategy itself and with other strategies.	The strategy has been updated to include further information on linking into other strategies and priorities.
With regards to the partner relationships there is no explicit mention of local health and Wellbeing Boards, this may be implicit. I feel that given the fact that development and delivery of local action will take place with partners at local level, and for that reason it may be worth making it explicit.	Text has been updated to reflect the local Boards.
The strategic vision is focused on the County of Kent. It needs to be focused on the people of Kent.	This is incorporated within the vision.
Perhaps more account could be taken of measures that allow for automation devices in buildings such as ensuring buildings have lights that turn off when no movement is detected.	This is covered under Theme 2 priority 6: <i>Improving our resource efficiency such as energy, water and land</i> . Specific measures and technology types would come under activity level as part of the implementation plan.
It is not clear on whether all of the targets and indicators in the strategy are achievable and whether they SMART with respects to the	The current indicators and targets are preliminary and will be developed as part of the implementation plan, and will be

Response summary	Strategy update
priorities.	developed to be SMART.
In order to embed sustainability in routine practice we need to have higher aspiration and work with both SMEs ⁸ and large employers in Kent for addressing some of the bigger issues such as sustainable transport and procurement.	Widening the scope to larger organisations is currently out of scope due to resource constraints but this will be reviewed as part of the implementation plan activity on a project by project basis.
In addition to the impact of severe weather on mortality, there needs to be reference to morbidity as well, with clear mitigating action.	Text has been updated and this will be taken into consideration as part of the implementation plan, specifically under Theme 1 and sub-priority 1.2.
The approach that there is good reference to using our natural resources to promote population's health and wellbeing is welcomed, perhaps in the action points there could be explicit actions on what role the strategy will play in connecting people to natural assets.	This comes under Theme 2 and priority 7; specific activity will be identified as part of the implementation plan.
There is a mix of units, kilometres and miles used for transport infographics in the text of Theme 2.	These have been amended
There were comments on needing to better recognise the value of green infrastructure beyond biodiversity. Recognising the multifunctional aspects of green infrastructure to mitigate or supportive adaptive measures climate change, severe weather and health and wellbeing.	The text of the strategy has been updated to strengthen this.
There was feedback that it is not always clear on the link between the state of the environment report and the challenges presented in the strategy. A specific example is the failure to meet the Biodiversity 2010 targets.	The text of the strategy has been updated and a section on biodiversity included, reflecting some of the key challenges we face in that area. An additional section has also been included under <i>How we will deliver the strategy</i> , which is highlighting the link between the strategy and priorities, and the actions and activities that will deliver on those priorities through the implementation plan.
Detailed feedback was provided from a number of respondents to clarify the links between the strategic priorities here and the National Planning Policy Framework and local plans.	This feedback has been incorporated across the strategy and will be key to ensuring that activities in Theme 3 in particular are effective and deliverable.

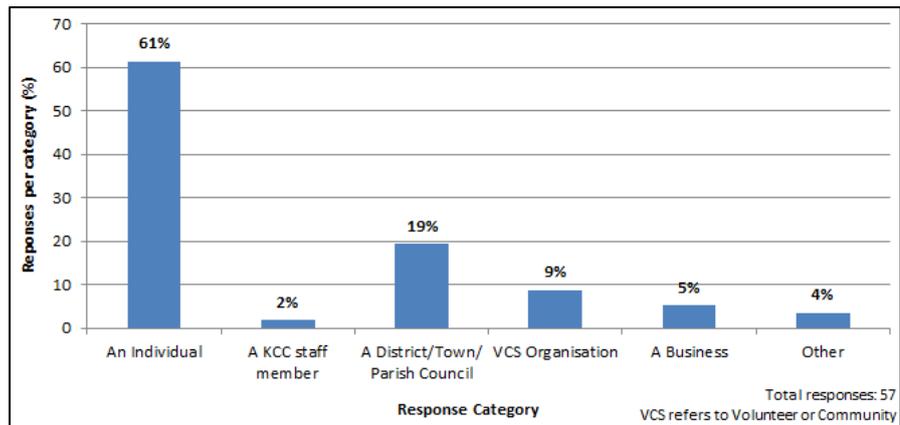
⁸ SMEs: Small and Medium Enterprises

5.0 Equalities review

This section summarises information received through the equalities section of the consultation questionnaire. Responses to this section of the questionnaire were low in number with only around 51% of those who responded online provided data on equalities. This information provides us with an understanding as to reach and representation of the consultation. It is clear from the information gathered that as projects and activities develop we will need to more actively identify opportunities to ensure that we are reaching a range of residents across demographic groups.

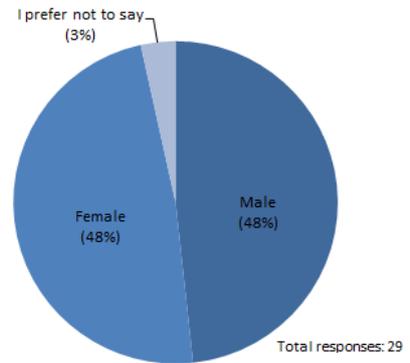
Respondent type:

A total of 57 consultees responded to the online questionnaire. The majority of those (61%) were individuals followed by district and parish council representations (19%). There were small numbers of representations from business, volunteer/community organisations/groups and from Kent County Council.



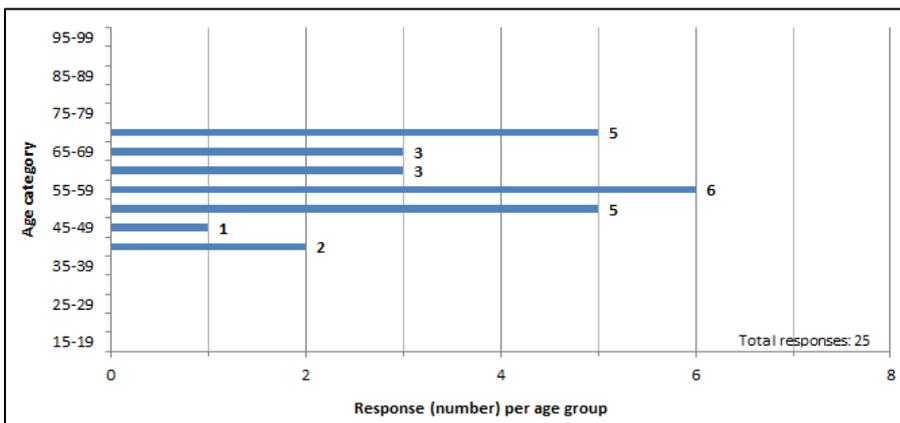
Gender:

29 consultees responded to this question and there was an even proportion of people responded to *male* and *female* with the remainder of responses recorded as *preferring not to say*.



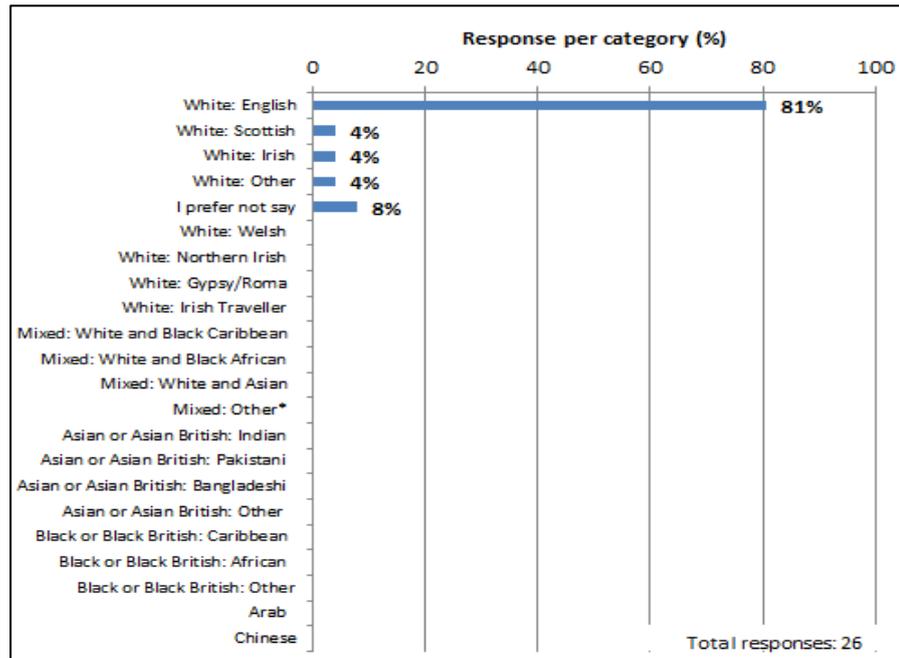
Age:

25 consultees responded most of which are between 50 and 75 with a small number in the 40-49 age bracket. There were no responses recorded under 40 or 75 or older.



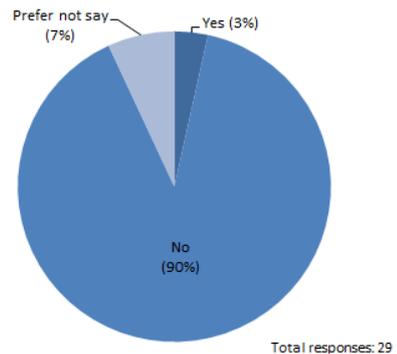
Ethnicity:

26 consultees responded to this question. 22 categories were available of which five were selected with the majority being *White English* (81%). The full category list is given in the chart below with actual responses.



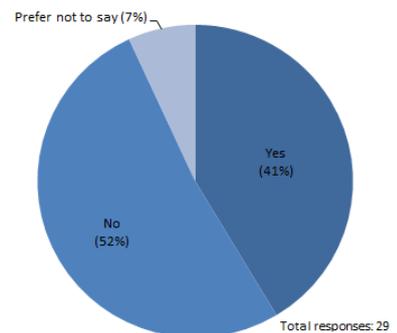
Disability:

29 consultees responded to this question with the majority (90%) stating that they are not classified as having a disability; 7% stated that they preferred not say and 3% stating they did. Of those responses that stated that they do have a disability there were eight categories provided: *Physical impairment; Sensory impairment (hearing, sight or both); Long standing illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy; mental health condition; learning disability; prefer not to say and other.*



Religion:

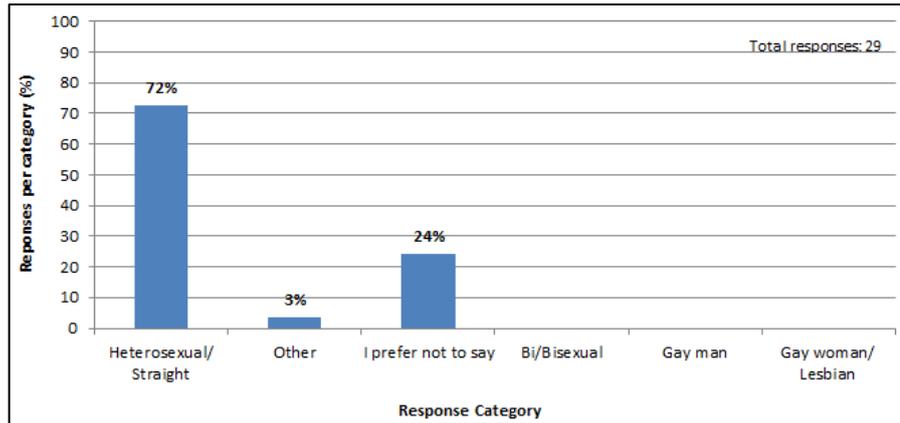
29 consultees responded to this question with six faith group categories provided and a *Other* category for other faiths not included in the list. Most of the 29 responses (52%) stated that they do not belong to a particular faith group, 42% stated that they do with a further 7% stating that they *prefer not to say*.



The six faith categories provide were: *Christian; Buddhist; Hindu; Jewish; Muslim and Sikh*. The majority of responses, of which there were 12 were for *Christian* (92%) with the remainder (8%) for *other*.

Sexuality:

29 consultees responded to this question with four categories provided. The majority of responses (72%) were for *heterosexual/straight* followed by *prefer not to say* (24%) and *other* (3%).



6.0 Next steps

Feedback from the consultation has been incorporated into a final draft of the Kent Environment Strategy. The focus of work across partners will now be on developing the implementation plan which will detail the activities that will take place to deliver the strategy and its priorities; this is currently in development.

- March/April:** Finalisation of the partnership Implementation plan underpinning the strategy (led by KCC in collaboration with partners). A workshop will be held on 25th February to confirm draft identified actions and finalise the plan.
- Summer 2016:** Adoption of the KES by all partners and launch (as endorsed at Kent Leaders on 24th November 2015). All partners are currently confirming internal processes for adoption prior to the launch event.