

Agenda

Environment Committee Meeting

Date: Thursday, 29 June 2023

Time 7.00 pm

Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT*

Membership:

Councillors Roger Clark, Mike Henderson, Carole Jackson, Rich Lehmann (Chair), Charlie Miller, Pete Neal, Chris Palmer, Ashley Shiel, Julien Speed, Paul Stephen, Sarah Stephen, Angie Valls, Dolley White (Vice-Chair), Mike Whiting and Chris Williams

Quorum = 5

Pages

Information about this meeting

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2. Apologies for Absence

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Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

4. Minutes

To approve the [Minutes](#) of the meeting held on 2 March 2023 (Minute Nos. 757 – 764) and the [Minutes](#) held on 17 May 2023 (Minute Nos. 21 - 22) as correct records.

Part B reports for the Environment Committee to decide

- | | | |
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Issued on Wednesday, 21 June 2023

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**Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT**

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Environment Committee	
Meeting Date	29/06/23
Report Title	The provision of minor maintenance and cleansing of public conveniences – procurement of new contract.
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Alister Andrews, Environment Services Manager
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. Undertake a tender exercise to provide minor maintenance and cleansing of public conveniences for 1 year with a 1 year extension option from 1st April 2024. 2. To remove the ‘temporary’ toilet block at Halfway cemetery.

1 Purpose of Report and Executive Summary

- 1.1 A full review of public conveniences is required to consider options and make the necessary savings to meet the medium-term financial plan. Such a thorough review will take time to produce. The current ‘Minor Maintenance and Cleansing of Public Conveniences’ contract expires on 31st March 2024. In order for the more detailed report to be produced and the recommendations discussed, it is advised that a tender exercise is undertaken to continue to provide the necessary services for an extended period. The specification for this procurement exercise will include amendments to meet the necessary reduced expenditure of £59K as agreed by full council on 22nd February 2023. It may also include further adjustments to meet future saving requirements after discussion by Members.

2 Background

- 2.1 The current contract has been provided by Monitor Services Ltd since April 2017.
- 2.2 In August 2021 Members approved a recommendation to extend the current ‘Minor maintenance and cleansing of public conveniences’ contract until 31st March 2024. There are no further options to extend this contract and a new procurement exercise would need to be conducted to provide these services.
- 2.3 The contract requires Monitor Services to open, close and cleanse the Swale Borough Council owned public conveniences. Some facilities are ‘attended’ which means a member of staff is present throughout opening times and others are unattended. The current list of public conveniences consists of:

- The Forum, Sittingbourne (attended – shared attendant with Central Avenue)
- Central Avenue, Sittingbourne (attended – shared attendant with The Forum).
- Rose Street, Sheerness (attended)
- Central car park, Faversham (attended)
- Leysdown Beach Services (attended seasonally)
- Minster Leas
- Park Road, Faversham
- Milton Regis
- Queenborough Park, Queenborough
- Bartons Point, Isle of Sheppey
- The White House, Minster
- Oare Gunpowder Works Visitors Centre, Faversham
- Halfway cemetery, Isle of Sheppey
- The Spinney, Leysdown
- King George V Playing Field, Sittingbourne
- Milton Creek Country Park

A new public convenience at Beachfields, Sheerness is due to be completed in June 2023. This will be an unattended facility and added to the contractors list for opening, closing and cleaning.

Minster Leas facility was an attended facility, but this was reviewed and amended to make it an unattended toilet for 23/24 as part of the budget process agreed by members in February 2023.

- 2.4 The majority of public conveniences are open between 07.00 and 19.00 Mon – Sun, but a full list of opening times is available in Appendix I as there are some variations to these opening times and some facilities have seasonal changes.
- 2.5 The contractors provide toilet roll, cleaning materials and undertake minor maintenance such as graffiti removal, cubicle lock repairs, replace toilet roll holders and toilet seats and unblock drains between the toilet and the nearest inspection chamber. Other more major repairs such as broken tiles, sinks, bowls or structural elements are reported to property services for repair via a separate property maintenance contract.
- 2.6 The contractor also undertakes routine deep cleans at each facility and toilets may be kept open later for special events.
- 2.7 Ad-hoc refurbishments have taken place as required to deliver improvements using one-off funding from the reserves, but the overall asset management and levels of public convenience provision will need a more detailed review and a subsequent report for consideration by Members. For example, are they in the right locations, what are the conditions of the buildings and what investment will they need. Will new technology allow a change in approach e.g. electronic opening and closing. A procurement exercise will create the time for this work to be completed and debated fully.

- 2.8 In 2022/23 the cost of the core contract was £311K. Other fees were paid due to special event opening.
- 2.9 The current contract allows variation by joint agreement, so it is anticipated that it is best to make service changes at the point of tendering for the new contract.
- 2.10 The intention of this report is to facilitate a discussion on what Members feel is important over the next few years, whilst understanding the need to keep costs as low as possible in the current financial situation
- 2.11 Potential considerations for this short term contract;
- Should opening and closing times be varied?
 - Do the facilities that currently have attendants need them – or can they be varied to busier days of the week only or a shorter time period?
- 2.12 A ‘temporary’ toilet block was deployed at Halfway Cemetery over ten years ago. The purpose was to compensate for the cemetery public conveniences being removed when ‘The Lodge’ at Halfway was sold. There are no other cemeteries in Swale with public toilet facilities. Contractors who maintain the cemetery grounds have their own facilities to use. Furthermore, the cemetery is now full and is not offering new plots. Therefore, the number of funerals that take place are massively reduced.
- 2.13 The views of officers is that this unit is no longer essential and it looks unsightly as it is a temporary structure. This facility costs the council £3.5K pa in hire charges plus electricity and water. The costs of opening, cleansing and maintaining this facility are £5.4K pa. The total saving would therefore be approx. £9K per annum.

3 Proposals

- 2.1 It is recommended that the council undertake a new procurement exercise to provide minor maintenance and cleansing of public conveniences for 1 + 1 years from 31st March 2024. This will allow time for the full review of public conveniences to take place and for the outcomes to be delivered in readiness for the following tender process. The option to extend by 1 year is a resilience measure to account for unforeseen project creep.
- 2.2 To remove the temporary toilet block at Halfway cemetery. The facility is costly to hire and it looks unsightly. No other cemeteries in Swale have public conveniences at them. Use of the facility is suspected to be limited. Suitable communications will be placed at the site to forewarn visitors prior to the removal and advise where the nearest public conveniences are.

4 Alternative Options Considered and Rejected

- 4.1 Continuing to deliver this service via a contractor without undertaking a procurement exercise would breach procurement legislation and may lead to complaints from market competitors and possible investigation.
- 4.2 Do not undertake a procurement exercise/ award a contract. This will prevent public conveniences from being opened, closed or maintained and it is effectively a decision to close all public conveniences in Swale as they could not be managed sufficiently without such measures in place. This option is therefore not recommended.
- 4.3 Officers not to undertake a review of the public convenience assets. This is not advised as the council must meet financial obligations and reviewing what assets we have in place and how we deliver the services from those assets is key to ensuring the council is working as efficiently and effectively as possible. This is essential to meet our financial obligations.
- 4.4 To keep the Halfway Cemetery temporary toilet facility open. This is not recommended as the hire costs for this facility will restrict maintenance and improvements at other permanent facilities. No other cemeteries have public conveniences and cemetery contractors have their own facilities to use. The temporary block looks unsightly. The usage of the facility is limited and visitors generally spend a short amount of time at the cemetery. The removal of the facility will further reduce contract costs for opening, closing and cleaning public conveniences. If the facility remains, then these savings will need to be found from other areas of the business.
- 4.5 Members could also choose to close facilities. This is not recommended until a full review is undertaken.

5 Consultation Undertaken or Proposed

- 5.1 In 2018 a survey was conducted to determine usage of public conveniences. As expected, the results showed a mixture of usage with Queenborough Park equating to a cost of £1.10 per user in 2018 and Central Avenue costing £0.05 per user. Unfortunately, due to access issues, there were no results obtained for Halfway Cemetery. However, the cost per user for the Halfway toilet would be estimated at the higher end of the scale.
- 5.2 If it is agreed to remove the temporary building then signs will be erected in advance of removal to inform visitors to the cemetery and advise where the nearest public conveniences are.

6 Implications

Issue	Implications
Corporate Plan	Priority 4 – Renewing local democracy and making the council fit for the future (...support staff to find innovative ways to ensure objectives can be met in the context of diminished resources).
Financial, Resource and Property	<p>The Halfway cemetery toilet was a temporary measure over ten years ago. It is still in situ and would equate to one of the more expensive facilities on a per user basis. No other cemetery has a public convenience in it. The structure looks out of place and unsightly. The cabin costs £3.5K pa to hire plus utilities. It costs a further £5.4K to maintain, open and clean it. If agreed, the savings could be immediate.</p> <p>The further officer review will determine usage and provide recommendations on assets and funding options for the future.</p> <p>In February 2023 Members agreed to reduce the public convenience budgets by £59K. The majority of this saving will be delivered by the removal of attendants at Minster Leas and the yet to be completed Sheerness toilets at Beachfields. The removal of the facility at Halfway should also contribute to the necessary in year and future year savings.</p> <p>The contract needs to be awarded in line with current revenue budgets. As the last tender was in 2017, it is expected that costs will rise and therefore additional amendments to the specification are required in order to meet the budget.</p> <p>As an indication of costs, based upon previous contracts, it is not unreasonable to estimate that a fully attended facility may cost in the region of £50K - £60K pa to service. A seasonally attended facility may cost £40K to £45K and an unattended facility £2K to £10K pa. These estimates will of course increase with inflation and they are only being provided to assist discussion.</p>
Legal, Statutory and Procurement	<p>The procurement of a service provider will be advertised in line with the contract legislation requirements.</p> <p>The Public Health Act 1936 gives Local Authorities a power to provide public toilets, but it imposes no duty to do so.</p>
Crime and Disorder	Some toilets are attended to ensure that facilities are kept up to the necessary standard, but also to deter crime and disorder. The risk of damage and anti-social behaviour may increase in unattended facilities. The opening and closing times are structured to avoid

	times of the day when anti-social behaviour is more prevalent. These can be altered accordingly to site specific issues.
Environment and Climate/Ecological Emergency	Contract Monitoring Officers and Property Services will start to assess building options, spatial provision, working practices/ water usage and the chemicals used for cleaning to ensure they are the best environmental option. The removal of the Halfway Cemetery facility will reduce council water and energy usage.
Health and Wellbeing	The public convenience facilities operate in line with government guidance to ensure they remain safe. Such facilities are appreciated by members of the public and they have obvious health and well-being benefits. However, the contract costs are significant and it is important that we keep reviewing these facilities to ensure we are providing the right resource in the right place.
Safeguarding of Children, Young People and Vulnerable Adults	The appropriate safeguarding requirements will be identified in the specification of the tender.
Risk Management and Health and Safety	The evaluation of the submitted tenders will include the contractor's approach to risk management and health and safety. This will be maintained and monitored throughout the contract.
Equality and Diversity	All Swale Council public conveniences provide for a range of disabilities. Recent additional signage has supported the 'Not every disability is visible' campaign at all sites.
Privacy and Data Protection	None identified at this stage

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

Appendix I – List of public conveniences and the current opening times

8 Background Papers

None

Sittingbourne	Address	Area	Postcode	Type	Opening times	Attended?
Central Avenue	Central Avenue	Sittingbourne	ME10 4BX	Female & Male	07.00 and 19.00 Mon – Saturday and 09.00 – 18.00 on Sunday and Bank Hols	Yes - shared with Forum
King George V Playing Fields	Park Avenue	Sittingbourne	ME10 1QX	Unisex	07.00 and 19.00 Mon – Sunday	No
Milton Creek Country Park	Grovehurst Road	Milton	ME10 2DE	Female & Male	07.00 and 16:00 Mon - Sunday between October and 31st March 07.00 and 19.00 1 April - 30 September	No
Milton Regis	High Street	Milton	ME10 2AN	Female & Male	07.00 and 18.00 Mon – Sunday	No
The Forum	High Street	Sittingbourne	ME10 3DL	Female & Male	07.00 and 19.00 Mon – Saturday - closed Sundays	Yes - shared with Central Avenue
Faversham						
Address	Area	Postcode	Type	Opening times	Attended?	
Central Car Park	Cross Lane	Faversham	ME13 8PN	Female & Male	07.00 and 19.00 Mon – Saturday and 09.00 – 18.00 on Sunday and Bank Hols	Yes
Oare Gunpowder Works	Bysingwood Road	Faversham	ME13 7UD	Female & Male	07.00 and 19.00 Saturdays, Sundays and Bank Hols	No
Park Road	Park Road	Faversham	ME13 8ES	Female & Male	07.00 and 19.00 Mon – Sunday	No
Isle of Sheppey						
Address	Area	Postcode	Type	Opening times	Attended?	
Bartons Point	Marine Parade	Minster	ME12 2BX	Female & Male	07.00 and 19.00 Monday - Sunday during school holidays, and on Saturdays, Sundays and Bank Holidays otherwise, until the end of May; daily from June until the second Sunday in September; and for seven days a week during school holidays, and on Saturdays, Sundays and Bank Holidays throughout the remainder of September, and during October and the first week of November - OPENING TIMES SUBJECT TO CHANGE	No
Halfway Cemetery	Halfway Road	Halfway	ME12 3AU	Female & Male	07.00 and 19.00 Mon – Sunday	No
Leysdown Beach Services	Grove Avenue	Leysdown	ME12 4QE	Female & Male	07.00 and 19.00 Mon – Saturday and 09.00 – 18.00 on Sunday and Bank Hols (except for Leysdown beach services which is open from 09.00 to 18.00 from Good Friday until the last Sunday in September and Saturdays and Sundays throughout the remainder of September and October (the external toilet at Leysdown beach is open from 18.00 until 09.00 during July and August).	Yes - seasonal
Minster Leas	The Leas	Minster	ME12 2NL	Female & Male	07.00 and 16:30 Mon - Sunday between October and 31st March 07.00 and 19.00 1 April - 30 September	Not from May 2023
Queenborough Park	High Street	Queenborough	ME11 5AG	Female & Male	07.00 and 19.00 Mon – Sunday	No
Rose Street	Wood Street	Sheerness	ME12 1UA	Female & Male	07.00 and 19.00 Mon – Saturday and 09.00 - 18.00 on Sunday and Bank Hols	Yes
The Spinney	Leysdown Road	Leysdown	ME12 4QX	Female & Male	07.00 and 19.00 Mon – Sunday	No
The White House	The Broadway	Minster	ME12 2DE	Female & Male	07.00 and 19.00 Mon – Sunday	No
Beachfields	Sheerness seafront	Beach Street	ME12 1RE	Female & Male	To open June 2023 - opening times to be agreed	No

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Environment Committee	
Meeting Date	29 th June 2023
Report Title	Air Quality Action Plan (2023 to 2028) with outcome of public consultation
EMT Lead	Lisa Fillery, Director of Resource
Head of Service	Tracey Beattie, Mid Kent Environmental Health Manager
Lead Officer	Clare Lydon, Senior Scientific officer
Classification	Open
Recommendations	1. That the Environment Committee approves the draft Action Plan in Appendix 1, to enable the plan to be submitted to Defra as Swale’s Air Quality Action Plan (2023 – 2028)

1 Purpose of Report and Executive Summary

- 1.1. The Swale Borough Council Air Quality Action Plan (AQAP) concluded December 2022, and we are required to propose a new plan for the next five years (2023 to 2028). We have assessed the current measures and considered new measures in the update. These were presented to Committee on the 3rd November and approved for public consultation.
- 1.2. The updated action plan has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the actions that Swale Borough Council will deliver between 2023 and 2027 to reduce concentrations of air pollutants and the receptor exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Swale area. As a working document it will be revised throughout the five-year period to ensure it remains relevant.
- 1.3. On the 4th November 2022 committee authorise the Head of Service to undertake a public consultation on mitigation actions for the draft Air Quality Action Plan 2023 to 2028 as proposed and prepared by the Air Quality Steering group.
- 1.4. The public consultation ran between the 4 November to 15 January 2023. The responses have been analysed in a separate report which has been incorporated into the final Air Quality Action Plan as Appendix A. Following the consultation, the list of actions has been finalised and included in the Air Quality Action Plan 2023 – 2028 document.

2. Background

- 2.1. Swale Borough Council has a statutory duty under Part IV, Section 83 (1) of the Environment Act 1995, to review and assess air quality and take the necessary actions to improve areas of poor air quality. If the UK government Air Quality Objectives (AQO) for key pollutants are exceeded, an Air Quality Management Area (AQMA) must be declared. To date Swale Borough Council has declared six AQMA’s for exceedances of the annual average AQO for nitrogen dioxide (NO₂) and one AQMA (St Paul’s Street) recently amended to include particulate matter (PM₁₀).

- 2.2. The current Air Quality Action Plan has five locations which exceed the annual Air Quality Standard (AQS) for nitrogen dioxide (NO₂) and declared as an AQMA. In 2020, an additional sixth AQMA was declared at Keycol Hill (AQMA 7) and will be included in the new Action Plan. The Action Plan will also include a separate section to cover the additional and amended declaration for PM₁₀ exceedances at St Paul's Street (AQMA 4).
- 2.3. Apart from the exceedance for PM₁₀ at St Paul's Street and Keycol Hill for NO₂ the general trend over the last four years is one of improving air quality in the AQMAs. Over the last three years there have been no exceedances of NO₂ of the 40µgm⁻³ in any other monitored AQMA's nor the extensive network of passive diffusion tubes across the Borough.
- 2.4. Section 3.5 of the Air Quality Action Plan document identifies reductions in road NO_x to achieve the government's current air quality objectives and annual data on pollution levels in the AQMAs. Table 7 in the document demonstrates that we must achieve reductions on road NO_x of between 10% and 45% to achieve the government's current air quality objectives. Also evident is that NO₂ levels have decreased since 2019, partly because of pandemic restrictions reducing car usage and also as part of a long-term trend of decreasing levels which has been seen both locally and nationally, primarily because of improvements in the vehicle fleet.
- 2.5. **Evidence based information:** The Air Quality Action Plan document includes data from three separate studies commissioned by the Council for its evidence.

The most recent source apportionment study, completed in 2021 focused on the concerning trends in PM₁₀ being recorded for St Paul's Street (AQMA 4) and looked specifically at sources of pollutants (NO₂, PM₁₀ and PM_{2.5}). The 2021 source apportionment study identified that diesel cars and light good vehicles (LGVs) contributed the highest percentage of emissions (section 3.3.1). The conclusion was supported by the findings of an older source apportionment study completed in 2018 for all AQMAs commissioned for the Air Quality Action Plan 2018 -2022 (section 3.3.2). The 2021 study also identified the fleet mix in Swale in 2021 was an older fleet when compared to the National fleet statistics.

The older study mentioned above which took place in 2018 study showed the traffic data taken from across all AQMA locations (excluding Keycol Hill) on average that 82% vehicle movements were cars, with 15% being LGV and 3% combined OGVs. This is comparable to the St Paul's study which showed cars (63%) and LGV (18%) were also responsible for the greatest contribution of PM₁₀ concentrations. This was similar a picture across all pollutants which should mean that any interventions will benefit all pollutants.

Both source apportionment studies recommended mitigation measures. The 2021 St Paul's Street study recommended incentives for electric vehicle charging/ ownership, a distribution hub, and traffic management measures. The 2018 study suggested strategic and localised measures to deliver compliance for all AQMAs by 2022 (excluding Keycol Hill). This earlier study also suggested options of a Clean Air Zone (CAZ) and localised measures such as 20mph zones, car clubs, local business and travel plans.

A third study specifically considered the feasibility of introducing a CAZ, completed in 2020 (section 3.3.3). The report recommended a non-charging CAZ; however, this was not supported by the highway's authority. Some non-charging CAZ measures have been included in this draft Air Quality Action Plan.

- 2.6. In developing the Air Quality Action Plan, we have followed the relevant Technical Guidance and Policy Guidance from DEFRA (TG22 and PG22, and previously TG16 and PG16, and have set up a steering group of relevant stakeholders to develop a list of actions. The Steering Group is composed of Swale and KCC officers from key service areas that can influence and impact air quality improvements. The steering group include representatives from:

SBC Environmental Health
SBC Development Management Team
SBC Economic Development Team
SBC Planning Policy
SBC Climate Action Officer
SBC Director of Resources
KCC (Highways, Public Health, Planning and Public Right of Way).

The steering group assessed the Air Quality Action Plan measure options, including a review of the 2018 – 2022 AQAP measures and suggestions from the studies mentioned above (paragraph 2.5). The group reviewed the viability of measures relative to delivery, cost and air quality outcomes and further prioritised (using cost benefit analysis) measures relative to the cost effectiveness of air quality and non- air quality benefits. As previously mentioned, some of these measures overlap with measures recommended as part of the CAZ feasibility study workshops with members in July 2020. Furthermore, the steering group agreed provisional timescales for the implementation of the proposed measures and monitoring standards.

- 2.7. Going forward the steering group will meet quarterly throughout the lifetime of the action plan. Task and finish sub-groups, responsible for implementing and delivering specific measures, will meet more regularly and report back to the steering group.
- 2.8. Key themes are included in the draft Air Quality Action Plan (section 3.6) which have been identified. The themes have been integrated into the actionable measures which aim to deliver compliance with Air Quality Objectives (AQO) within the AQMAs and improve air quality within the district as whole. The themes are not numbered relative to their importance (addition information is provided below in appendix 2 of this document:

Theme 1: Public Health and Wellbeing

Theme 2: Active Travel, Public Transport and Low Emission Vehicles

Theme 3: Transport, Transport Planning and Traffic Management

Theme 4: Local Planning Policy and Development Management

- 2.9. There are thirteen measures that have been taken forward for the Air Quality Action Plan update listed in table 9 within the Air Quality Action Plan document. The consultation feedback relative to these have been summarised in section 5.2.1 and the full consultation feedback is provided in Appendix A of the Air Quality Action Plan document. Further information on the consultation is below in section 6 of this committee report.

2.10. Defra's Policy and Technical Guidance 2022 for Local Air Quality Management

The draft Air Quality Action Plan document (section 3.2.4) explains key updates in the Policy Guidance relative to this action plan, providing clearer requirements for both district and county level councils to work together to ensure air quality is improved, as shown below:

- In paragraph 3.2, chapter 3 - ***“There are obligations on both district and county councils within Part IV of the Environment Act 1995. The Environment Act 2021 ensures that responsibility for solutions to poor air quality is shared across local government”*** ;
- Paragraph 3.8 chapter 3 states ***“The County Council will be required to commit to appropriate actions the county council will take to secure that air quality objectives are achieved”***;
- Paragraph 3.14, chapter 3 states ***“the legislation requires county councils to bring forward measures in relation to addressing the transport impacts for inclusion in any AQAP”***.

Effective partnership working with Kent County Council is essential for this Action Plan's success not only in the Public Health context but also for highway and active travel measures. There remains some uncertainty over the level of commitment, both financial and staffing for some projects by KCC. Swale Borough Council is committed in continuing to liaise with our county partner to improve and bridge the gap in responsibility for solutions to poor air quality, as this should be shared across local government.

2.11. Public Health Context

The draft Air Quality Action Plan document (section 3.2) explains the associated health impacts from air pollution and the Councils commitment to work closely with Kent County Council (KCC) Public Health team on identifying pollution/ deprivation/ vulnerability hotspots. This will help target communications and focus for the most effective actions in terms of improving public health.

KCC Public Health provided recommendations as part of the public consultation, shown in the draft action plan document (Appendix A) they propose further work on the impact of air quality on demographic populations and communications to these groups. This type of work has already started between KCC Public Health and SBC officers.

This is also supported by two Defra funded projects which target communications to raise awareness about air pollution impacts and promote ways to reduce exposure to air pollution:

- DEFRA funded Health Care Professionals Air Quality Resource. The project is to develop a digital training resource for Health Care Practitioners (HCPs) across Kent and Medway providing training, local evidence and resources to enable practitioners to advise patients with cardiovascular disease or respiratory disease on how to reduce their exposure to air pollution. The aim is for HCPs to integrate information on air pollution into routine practice and create a community across Kent and Medway to support continuous professional development and future collaboration.

- Digital education package called 'Pollution Patrol'. Pollution Patrol is an interactive learning resource, developed for primary schools to raise awareness of the causes and harmful effects of air pollution through fun, engaging and practical strategies that promote less polluting travel behaviour, and empower children to act as advocates for reducing air pollution.

3. Next steps

- 3.1. The Action Plan document will be sent to DEFRA for final approval.
- 3.2. Following final approval from DEFRA the Air Quality Action Plan will be published and made available on the Kent Air and SBC website.
- 3.3. The action plan will be a live document and progress on actions will be reported to DEFRA every year via SBC's Annual Status Report (ASR) on air quality.
- 3.4. The action plan will be reviewed and fully updated after a period of not more than five years.

4. Proposals

- 4.1. That Committee approves that the draft Action Plan given as Appendix 1, is formally adopted as Swale's Air Quality Action Plan (2023 – 2028)

5. Alternative Options Considered and Rejected

The alternative is to do nothing or not update the Air Quality Action Plan. However, Swale Borough Council has a statutory duty to review and assess air quality within its borough and take the necessary actions to improve areas of poor air quality. In other words, the Council will fail to comply with its statutory duties on Local Air Quality Management if an update is not completed.

In October 2020 Keycol Hill AQMA was declared. In line Defra (TG22) guidance the Council must have an action plan in place within eighteen months of the declaration. Therefore, it is essential this action plan is approved, as non-determination could cause delays and could trigger potential action from Defra for not having an action plan in place for Keycol Hill AQMA.

6. Consultation Undertaken or Proposed

- 6.1. Swale Borough Council undertook a consultation between 3 November 2022 and 15 January 2023. The survey was carried out online with paper copies of the survey available on request. The survey was open to all Swale Borough residents aged 18 years and over as well as visitors to the borough. SBC provided the following stakeholder engagement:
 - Letters distributed directly to households within and near the Air Quality Management Areas.
 - Social media and the Swale Borough Council's website
 - Swale news Business e-Bulletin and mailing lists to businesses and statutory consultees
 - Flyers put up in libraries and post offices

- 6.2.** The Consultation asked respondents their opinions about the proposed actions for the Air Quality Action Plan. There was an opportunity throughout the survey to provide additional comments. There was a total of 148 responses to the survey.

Two stakeholders sent in detailed responses on their organisation's views of the proposals. There were also some additional comments sent in by a resident, these had been included in the additional comments sections. A full summary of the consultation responses is included in Appendix A within the Air Quality Action Plan document.

- 6.3.** Measure 7 and 12 related to EV infrastructure and Measure 2 Local Cycling and Walking Infrastructure Plan (LCWIP) was considered the most achievable. It was also felt to have the potential impact with 37% to 41% responding major or moderate impact.
- 6.4.** Measure 3 - Air pollution alerts, information and to raise awareness on impacts and solutions. As part of the public consultation the Air pollution alerts measure was considered the highly achievable and with 36% responding major or moderate impact. The measure to Promote and encourage active travel and change of transport modes was considered less achievable on its own and has since been integrated into the air pollution alerts measure.
- 6.5.** Measure 10 - Car clubs and EV bike hire schemes on development and public spaces measure was considered the least achievable and had a lot of respondents not sure on its achievability. Interestingly the proportion responding to achievable decreases as age increases. Therefore, this could suggest car clubs are more popular among the younger generation. It also had the least potential for impact with 52% responding slight impact or no impact. Contrary to this, we have seen a successful and high uptake of users for the Faversham car club, so there is some evidence it is achievable. However, uptake and impact may differ relative to location and other demographics.
- 6.6.** Since the consultation, Measure 4 and 5 have been added to the list of AQAP measures:

Measure 5 is to reduce emissions from activities with Environmental Permits - This measure has been added in line with recommendations outlined in the LAQM Toolkit from the updated TG22 (Annex A, Table A.1), as it shows emission reduction from permitting can be considered in the Air Quality Action Plan.

The Council complete permit inspections for installation and can provide data relative to emission reductions via Defra returns. Where an installation is located close to sensitive receptors, such as housing or an Air Quality Management Areas, a higher risk score can be applied at the risk assessment stage, resulting in more stringent enforcement and more regular inspections, thus improving air quality.

Measure 4 is to apply for Defra Air Quality Grant scheme to facilitate future funding for suitable Air Quality Action Plan measures. The steering group felt it was essential that this measure is included to ensure it continues to be completed each year to improve air quality and public health.

7. Implications

Issue	Implications
Corporate Plan	Priorities: Investing in our environment and responding positively to global challenges: The Air Quality Action Plan update prioritises measures that benefit air quality for our residents through reducing pollution emissions within the district. The plan aligns with Swale's climate change goal.
Financial, Resource and Property	Measures identified at this time contain no new financial commitments and are contained within current budgets. Specific projects will be linked to planning mitigations and S106 funding.
Legal, Statutory and Procurement	The updated Air Quality Action Plan meets the councils' legal duties under the Environment Act 1995 and the Local Air Quality Management framework.
Crime and Disorder	None identified
Environment and Climate/Ecological Emergency	This proposal aligns with ambitions included in the Councils Climate and Ecological Emergency declaration.
Health and Wellbeing	The updated Air Quality Action Plan will have a positive impact on Public Health and Wellbeing of the population of Swale BC.
Safeguarding of Children, Young People and Vulnerable Adults	None identified
Risk Management and Health and Safety	Supporting the recommendation will reduce risk for the authority. No Health and Safety implications identified. The consultation will follow Data Protection Act 2018 measures.
Equality and Diversity	None identified
Privacy and Data Protection	None identified

7. Appendices

Appendix 1: Air Quality Action Plan (2023 – 2028) which includes the public consultation under appendix A (attached)

Appendix 2: The AQAP themes for delivering compliance within the AQMAs are below

8. Background Papers

Swale Borough Council Strategic Air Quality Action Plan (2018 to 2022) –
https://services.swale.gov.uk/assets/Air-Quality/AQAP_SwaleBC_2018%20final.pdf

Swale Borough Council Air Quality Action Plan (2023 - 2028)

Supersedes 2018 – 2022 AQAP

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

2023

Local Authority Officer	Clare Lydon
Department	Environmental Protection Team Mid- Kent Shared Service Environmental Health
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Report Reference number	To be added
Date	January 2023

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the strategic and local actions we will take to improve air quality in Swale Borough Council between 2023 and 2028.

This Strategic action plan replaces the previous action plan which ran from 2018 to 2022. The measures detailed within this updated action plan are largely district-wide with some localised measures and are relevant to all AQMAs listed in table 1.

Projects delivered through the past action plan include:

- Clean Air Zone (CAZ) Feasibility study – Options for this were given thorough consideration between Swale and relevant services in KCC to review the viability of implementing a non-charging CAZ (further details in section 3.3.3).
- Anti-idling campaign was launched to lower NO_x and PM₁₀ emissions in idling hotspots.
- Faversham Car Club launched successfully - Low emission mobility which can help to break dependency on private car use.
- Business Travel Plans – Engagement with businesses to encourage business modal shift and active travel. KCC and district distribution support local businesses to switch to ULEV vans through the Kent REVS Up for Cleaner Air scheme (30+ businesses took part in Swale).
- Local school travel plans
 - Three schools signed up to the 'Clean Air for Schools' Scheme, taking part in anti-idling campaign activities. This included signposting all schools to Kent Smarter Travel scheme for travel plans and capital grant funding to support more sustainable travel.
 - Green School Forum was set up in 2022 by the Council to engage with schools on range of schemes related to air quality and climate action. This includes Youth Climate Project Competitions funded by the Council.

- Funded by the Defra Air Quality Grant Pollution Patrol digital resource for schools was set up aimed at children aged 5-11 (and their parents). The aim being to educate, raise awareness and promote behaviour change.
- The Swale Borough Local Plan Review Regulation 19 Document (February 2021) includes an Air Quality Policy (DM 33). Swale's Air Quality and Planning Guidance was updated in 2021.
- Swale's Parking SPD was adopted in 2020. This includes requirements for Parking for Ultra Low Emission Vehicles with the objective of improving air quality.
- New Taxi licencing policy developed and an electric vehicle charging point for taxi's was installed at Central Avenue.
- Swale's Electric Vehicle Strategy (adopted June 2022) and charge points were implemented -18 new charging spaces (+18 existing spaces from 2022 works).
- "20 is plenty" zones in Faversham (led by Faversham Town Council and KCC) and Newington (led by Newington Parish Council and KCC)
- The St Paul's Street source apportionment study was completed to assist the authority to correctly target the most important sources of NOx and PM₁₀, to focus the principal measures for their reduction.
- Improved air pollution alerts and information for Swale - Kent and Medway Air Quality Partnership Group now have a new website managed by a new data management team at Ricardo. This includes improvements to the resources and content of materials including more interactive guidance for vulnerable groups.

Additions for the 2023 to 2028 AQAP include:

- Identified four new priority themes
- An update on general air quality trends within Swale
- Inclusion of the Keycol Hill AQMA declaration for NO₂ annual mean exceedance and an amendment to St Paul's for Particulate Matter (PM₁₀) 24 hour mean exceedance
- Information on changes to Defra's Technical Guidance (TG22) and Policy Guidance (PG22) (section 3.2.4).
- Information on recent changes to The Environment Act 2021 (Part 1) which established two new air quality targets (section 3.2.5).
- New AQAP measures to reduce NO_x, PM₁₀ and PM_{2.5} (section 5.1)
- Appendix C. Monitoring measures
- Appendix D. Explanation on evaluating the cost effectiveness and rag rating of measures

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2,3}. The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion⁴. Swale Borough Council is committed to reducing the exposure of people in Swale Borough to poor air quality in order to improve health. We have developed actions that can be considered under the following themes below (section 3.6):

Theme 1: Public Health and Wellbeing

Theme 2: Active Travel, Public Transport and Low Emission Vehicles

Theme 3: Transport, Transport Planning and Traffic Management

Theme 4: Local Planning Policy and Development Management

¹ Environmental equity, air quality, socioeconomic status, and respiratory health, 2010

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Chief Medical Officer's Annual Report 2022 publishing.service.gov.uk

⁴ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

The themes include various measure categories:

- Alternatives to private vehicle use
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency
- Environmental permits

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are many air quality policy areas outside our influence (such as vehicle emissions standards agreed in Europe), for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Swale Council's direct influence.

This action plan takes a collaborative approach with the Council's Climate and Ecological Emergency Action Plan and evidence-based Transport Strategy. We worked closely with officers from Kent County Council's Highways, Public Health and Active Travel departments to ensure that the measures detailed within this action plan continue to provide a holistic approach to tackling the sources of poor air quality in the borough.

Responsibilities and Commitment

This AQAP was prepared by the Mid Kent Shared Environmental Health Service on behalf of Swale Borough Council (SBC) with the support and agreement of the following officers and departments:

Tracey Beattie: Mid Kent Environmental Health Environmental Health Manager
Clare Lydon: Mid Kent Environmental Health Senior Scientific Officer
SBC Economic Development/ Culture and Places Team
SBC Climate Team
SBC Planning Policy Team
Kent County Council departments: Public Health and Highways

This AQAP has been approved key Council Members:

Swale Borough Council Elected Members	Signature
Councillor	To be added
Councillor	To be added
Director of Public Health	To be added

This AQAP **<has/has not>** been signed off by a Director of Public Health. **<Specify which body has signed off the AQAP>**

This AQAP will be subject to an annual review, appraisal of progress and reporting to the Environmental Protection Council Committee. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Swale Borough Council as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP, please send them to our Environmental Health admin team at:

Address Swale Borough Council
 Swale House
 East Street
 Sittingbourne
 Kent ME10 3HT

Telephone 01622 602184
 Email EHadmin@midkent.gov.uk

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1. Introduction

This report outlines the actions that Swale Borough Council will deliver between 2023 and 2027 to reduce concentrations of air pollutants and receptor exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Swale area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan is active but will be fully reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Swale Borough Council's Annual Status Reports.

The Swale Strategic AQAP (2023 - 2028) will include:

1. Clear vision and direction for the Swale Strategic AQAP;
2. Strategic and focused local measures to improve air quality across the borough as well as within the declared Swale AQMA's;
3. As part of the update the AQAP will review any existing and new source apportionment work for actions and measures.
4. Consultation and engagement process with all stakeholders and delivery partners on the key actions and measures within the AQAP; and
5. Implementation and delivery plan for the Strategic AQAP through 2023 -2028.

2. Summary of Current Air Quality in Swale Borough Council.

2.1. Location and context

Swale district is located on the centre of the North Kent Coastline, with the western side of the Borough linking to the Thames Gateway and on the eastern side with Canterbury and the Port of Dover. Census⁵ 2021 shows in Swale, the population size has increased by 11.7%, from around 135,800 in 2011 to 151,700 in 2021. Since 2011, there has also been an increase of 27.3% in people aged 65 years and over, an increase of 8.3% in people aged 15 to 64 years, and an increase of 9.4% in children aged under 15 years.

The Borough is predominately rural, with three main urban areas: Sittingbourne, Faversham and Sheerness. The Isle of Sheppey is isolated from the mainland by the Swale and linked by the A249 bridge. The port at Sheerness provides a gateway to mainland Europe for freight trade with both international and national markets. Canterbury, Ashford, Maidstone and The Medway Towns surround Swale creating a high demand on transport infrastructure. Central London is just 40 miles away with good access for commuting.

Swale is directly connected to the motorway network at junctions 5 in the west & 6 in the east of the M2, with the M20, M25 and M26 a short distance away. The historically built Roman road renowned for its straightness, the A2 was a major road in south-east England connecting London with the English Channel, through the Port of Dover. The M2 now replaces part of the A2 as the most strategic route. The primary road links west and east of the borough rely predominantly on the A2 corridor or the M2.

2.2. Air Quality Management Areas and overview of monitoring network

The A2 corridor through the Borough suffers from heavy traffic and congestion which has led to the declaration of five Air Quality Management Areas (AQMAs) along the A2

⁵ Census 2021: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000113/>

(AQMA's 1, 2/6, 3, 5 and 7) and another along the B2006 road, located within Sittingbourne's urban and industrial areas (AQMA 4).

The estimated population for each AQMA is shown in table 1. This value has been estimated by multiplying the number of properties by 2.4. According to the Office for National Statistics, "The average household size in England and Wales in 2021 was 2.4 people per household". The AQMA location maps are provided below (Figure 1 to 7) and are on the Defra website "List of Local Authorities with AQMA's"⁶. Census data was not used, as it is provided at an aggregate level which is too broad to pick out each individual address.

Table 1. The estimated population within the AQMAs

AQMA	Properties	Occupants
East Street AQMA	75	180
Keycol Hill AQMA	75	180
Newington AQMA	187	449
Ospringe Street AQMA	112	269
St Paul's Street AQMA	47	113
Teynham AQMA	37	89

Swale Borough Council has a comprehensive monitoring network of nitrogen dioxide (NO₂) monitoring sites including measurement by automatic analysers at three locations and 78 locations with passive diffusion tube devices (2021). One automatic analyser location (Ospringe) monitoring NO₂ and two locations (Newington and St Paul's Street) monitoring NO₂, PM₁₀ and PM_{2.5} (particulates less than 10 and 2.5 microns in diameter).

The Environmental Health Team started monitoring PM₁₀ in Ospringe in 2004 and stopped in 2023. This is mainly for three reasons. Firstly, the unit is approaching the end of its serviceable life and parts are increasingly difficult to purchase. Secondly, the TEOM at this site is causing higher than normal temperatures in the monitoring cabinet which affect NO₂ data collection and damage to multiple air conditioning units in the cabinet. Thirdly, the need to continue to record PM₁₀ at Ospringe has decreased, as the site has been shown no exceedances for PM₁₀ over the last five years.

⁶ <https://uk-air.defra.gov.uk/aqma/list>

The comprehensive network of monitoring within the district helps the Council to review and report the effectiveness of Action Plan measures to reduce NO₂, PM₁₀ and PM_{2.5} concentrations. Monitoring has identified six locations that exceed the annual Air Quality Objective (AQO) level for NO₂ and subsequently declared six Air Quality Management Areas (AQMAs) within Swale Borough. AQMA declaration details are listed below in table 2.

Table 2. AQMA location, year of declaration and Air Quality Objective that has been exceeded

AQMA	Location	Year declared	Level of the exceedance (2021)	AQO Exceedances
AQMA 1	Newington, (A2/High St)	March 2009	32µg/m3	Annual average for nitrogen dioxide (NO ₂)
AQMA 2/ 6	Ospringe Street, Faversham (A2/Ospringe)	June 2011 Revised (as AQMA 6) to the Mount in May 2016. AQMA 2 has now been revoked and renamed and consolidated into one as AQMA 6	34µg/m3	
AQMA 3	East Street, Sittingbourne (A2/Canterbury Road)	January 2013	28µg/m3	
AQMA 4	St Paul's Street, Milton, Sittingbourne (B2006)	January 2013 and amended in October 2020	32µg/m3 59 Exceedances of 50µg/m3	Annual average for nitrogen dioxide (NO ₂) and Particulate Matter (PM ₁₀) 24 hour mean
AQMA 5	Teynham (A2 /London Rd)	December 2015	26µg/m3	Annual average for nitrogen dioxide (NO ₂)
AQMA 6	Ospringe Street, Faversham (A2/Ospringe)	See details in AQMA 2 above.		
AQMA 7	Keycol Hill (A2)	October 2020	36µg/m3	

2.3. AQMA location maps

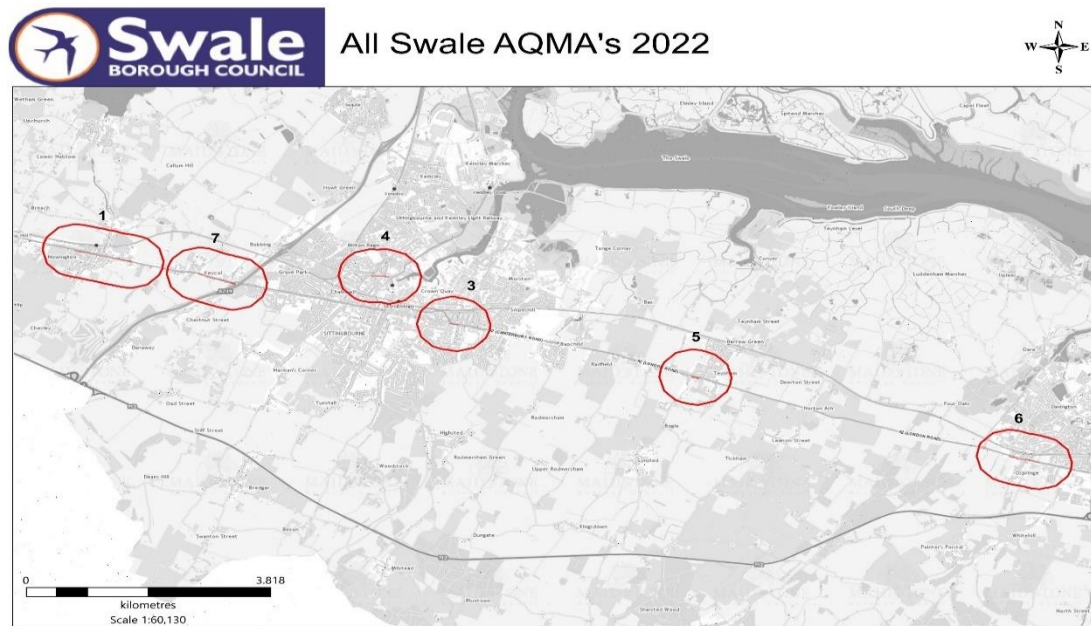


Figure 1. All Swale AQMA's 2022

NB. The small red outlines are the AQMAs. This includes buffer areas to aid viewing and have no reflection on the size or spatial context of the AQMAs.



Figure 2. Newington AQMA 1 with tube locations (2022)

Map 39: Ospringe Street AQMA 2022

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Figure 3. Ospringe AQMA 6 with tube locations (2022)

Map 37: East Street AQMA 2022

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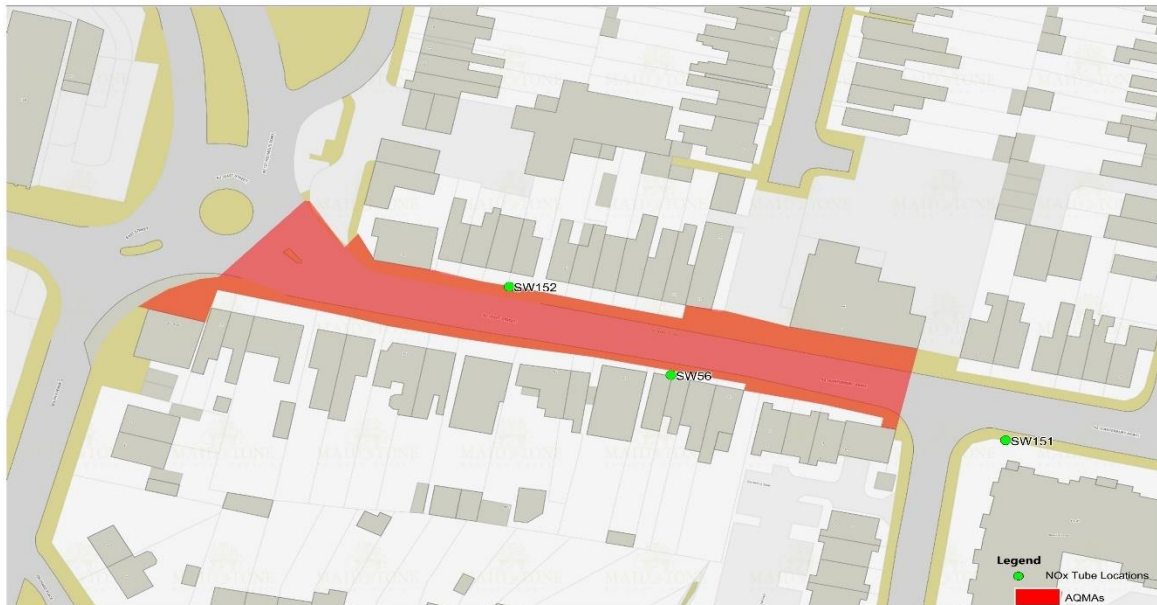


Figure 4. East Street AQMA 3 with tube locations (2022)

Map 36: St Pauls Street AQMA 2022

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Figure 5. St Paul's Street AQMA 4 with tube locations (2022)

Map 38: Teynham AQMA 2022

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Figure 6. Teynham AQMA 5 with tube locations (2022)

Map 40: Keycol Hill AQMA 2022

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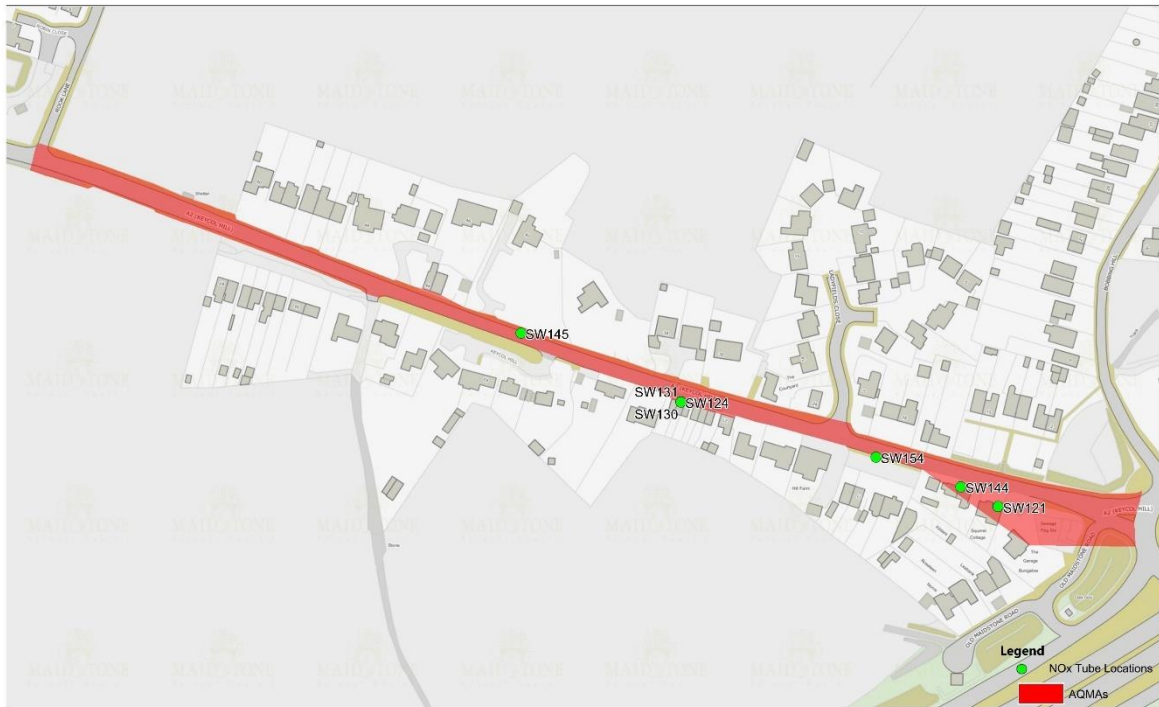


Figure 7. Keycol Hill AQMA 7 with tube locations (2022)

2.4. General air quality trends within Swale

The Annual Status Report (2022)⁷ shows that during 2021, all passive monitoring sites reported compliance against the annual mean Air Quality Standard (AQS) objective for NO₂ (below 40µgm⁻³). One site reported a concentration within 10% of the AQS objective. This is the second year that there has been full compliance at all passive monitoring locations across Swale. Despite this, there has been a 10% increase in concentrations across the overall network in Swale from the previous year. The impact of COVID-19 in 2020 caused a 29% reduction (the decreases ranged across the diffusion tube network from 17% to 38%) in passive monitored concentration, due to government restrictions on travel and disrupting usual traffic volumes.

⁷ https://swale.gov.uk/__data/assets/pdf_file/0005/435821/Swale-Borough-Council-2022-ASR_Final_v5.pdf

Table 3. Annual Mean NO₂ Monitoring Results: Automatic Monitoring (µg^m⁻³)

Site ID	AQMA	2017	2018	2019	2020	2021
ZW3	Ospringe	-	31.6	31.4	25.1	23.5
ZW8	St Paul's Street	35.1	39.7	39.1	31.6	30.6
ZW10	Newington	-	-	-	-	22.6

Table 3 shows automatic monitoring results for the annual Mean NO₂ and a decreasing trend at Ospringe and St Paul's Street sites. With all sites below the AQS objective. Separately, no sites exceeded the 1 hour mean (200 µg^m⁻³ not to be exceeded more than 18 times a year).

Table 4. Annual Mean PM₁₀ Monitoring Results (µg^m⁻³)

Site ID	AQMA	2017	2018	2019	2020	2021
ZW3	Ospringe	23	27.6	24.8	22.2	23.3
ZW8	St Paul's Street	-	-	28.1	31.5	37.1
ZW10	Newington	-	-	-	-	17.1

Table 4 shows automatic monitoring results for the annual mean PM₁₀. Ospringe Street has been compliant for 5 years and St Paul's Street for 3 years. Although both have shown a slight increase in 2021 with St Paul's Street being within 10% of the AQS objective of 40 (µg^m⁻³).

Table 5. 24-Hour Mean PM₁₀ Monitoring Results, Number of PM₁₀ 24-Hour Means > 50µg^m⁻³

Site ID	AQMA	2017	2018	2019	2020	2021
ZW3	Ospringe	5	5	15	13	12
ZW8	St Paul's Street	0	11	42	59	59
ZW10	Newington	-	-	-	-	0

Table 5 shows automatic monitoring results for the 24-Hour Mean PM₁₀ (50 µg^m⁻³ not to be exceeded more than 35 times a year). St Paul's Street has not been compliant for the last 3 years, with both 2020 and 2021 exceeding the 50µg^m⁻³ limit 59 times. The concentrations at the remaining two monitors do not exceed the 24-mean limit for PM₁₀.

Table 6. Annual Mean PM_{2.5} Monitoring Results (µg^m⁻³)

Site ID	AQMA	2017	2018	2019	2020	2021
ZW8	St Paul's Street	-	-	-	13.1	11.3
ZW10	Newington	-	-	-	-	11.8

Table 6 shows automatic monitoring results annual mean PM_{2.5} with both sites being compliant of the AQS for PM_{2.5}.

The latest Annual Status Report (ASR) was submitted to Defra and is available on the Kentair⁸ and SBC website for air quality⁹

⁸ <http://www.kentair.org.uk/>

⁹ <https://swale.gov.uk/bins-littering-and-the-environment/air-quality/monitoring#h2>

3. Swale Borough Council's Air Quality Priorities

This chapter presents the main priorities and approach taken by Swale Borough Council for the development and subsequent selection of measures that have been included within this AQAP. Included within this section of the AQAP are descriptions of the existing strategies and policies that relate to air quality within the district.

The AQAP measures presented in this report target the predominant sources of emissions for the entire District as well as the six AQMAs where air quality has failed to meet National Air Quality Objective levels. Details can be found in section 3.3.

In conjunction, with the strategies and policies currently in place, the conclusions of the source apportionment and CAZ Feasibility study have been used to identify and prioritise the measures presented within section 5.

3.2. Public Health Context

Air pollution is associated with several adverse health impacts. Some individuals such as those with pre-existing respiratory or cardiovascular disease are particularly susceptible, but the effects of air pollution can be seen across the population. The mortality burden of air pollution in England is estimated to be between 26,000 and 38,000 a year, but in addition many people suffer avoidable chronic ill health as a result of it ¹⁰.

There is gathering evidence regarding the impact of gaseous and particulate matter pollutants on respiratory and cardiac health from sources such as the Committee on the Medical Effects of Air Pollutants (2010) and the Royal College of Physicians and Royal College of Paediatrics and Child Health (2016)¹¹. Research has linked air pollution with cancer and dementia, as well as the additional impact on mental health from the traffic noise affecting residents in homes in air quality management areas.

¹⁰ Chief Medical Officer's Annual Report 2022: <https://assets.publishing.service.gov.uk/mwq-internal/de5fs23hu73ds/progress?id=i8m5J5egGiRk9LeevIwAnFTInUFKlpi6fR82MnB2s8.&dl>

¹¹ Every Breath We Take: www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

Figure 8 below outlines the air pollutants, sources and potential health impacts for NO_x and particulate matter, focusing on PM_{2.5} which has the greater potential to cause damage to health due to the smaller micron particle size.

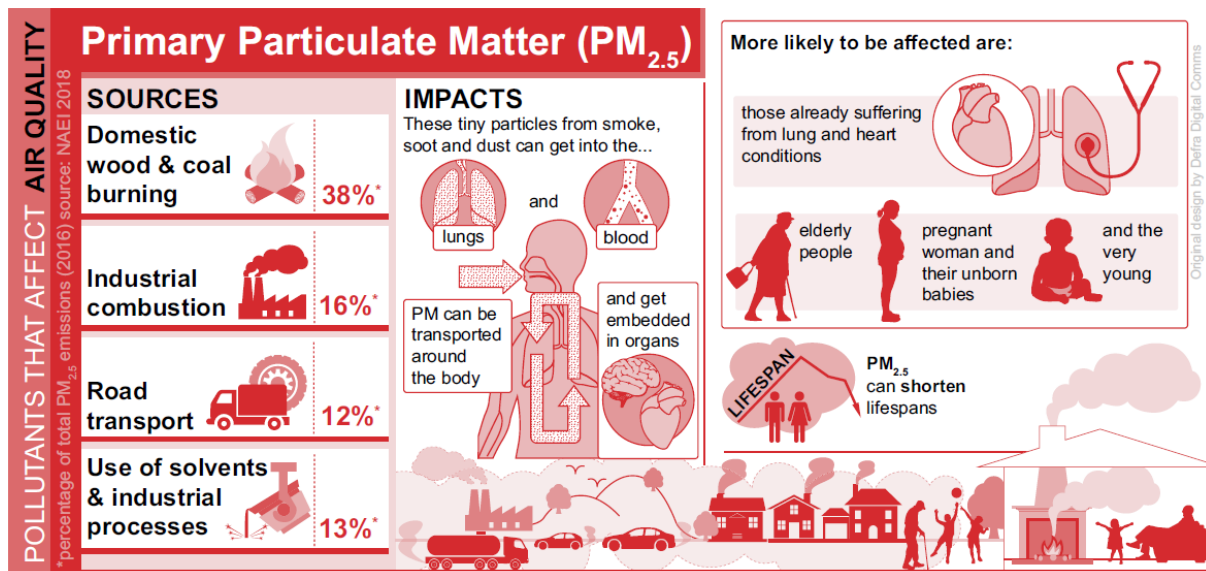
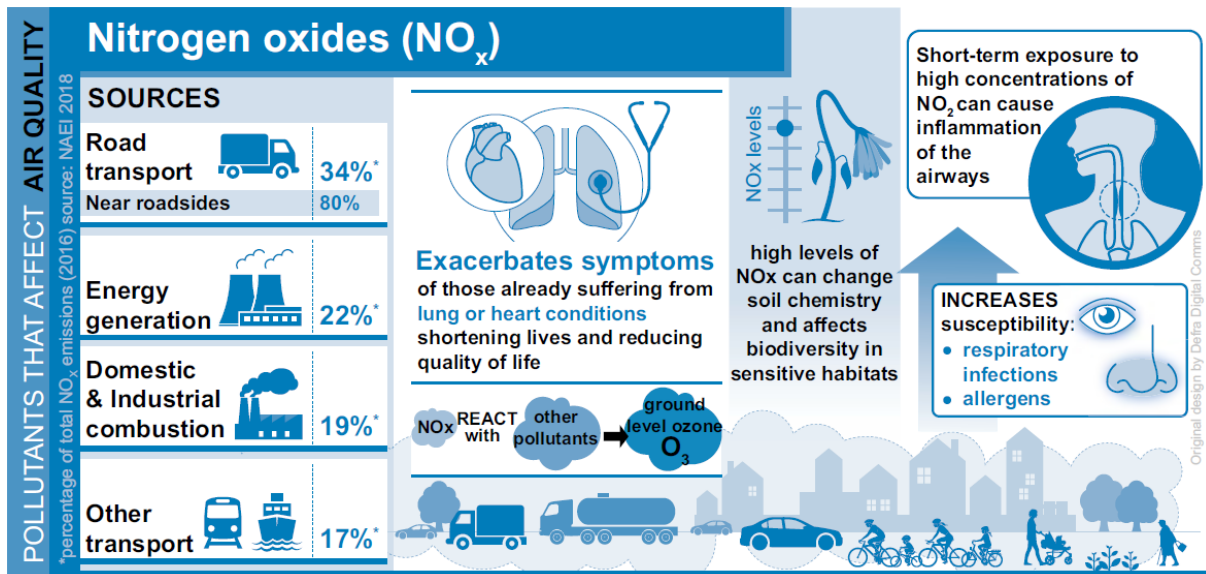


Figure 8. Air pollutants, sources and potential health impacts of NO_x and PM_{2.5} from the Clean Air Strategy 2019¹²

Figure 9 outlines the health effects of air pollution throughout life. Air pollution can be harmful to anyone; however, some people are more affected as a result of where they

¹² Clean Air Strategy 2019: <https://www.gov.uk/government/publications/clean-air-strategy-2019>

live, the concentration of air pollution they are exposed to in their day-to-day lives, or their inherent susceptibility to health problems caused by air pollution. Those who are more susceptible include¹³: children and older people, and those with heart and lung conditions. There is also often a strong correlation with inequalities because areas with poor air quality are also often the less affluent areas.

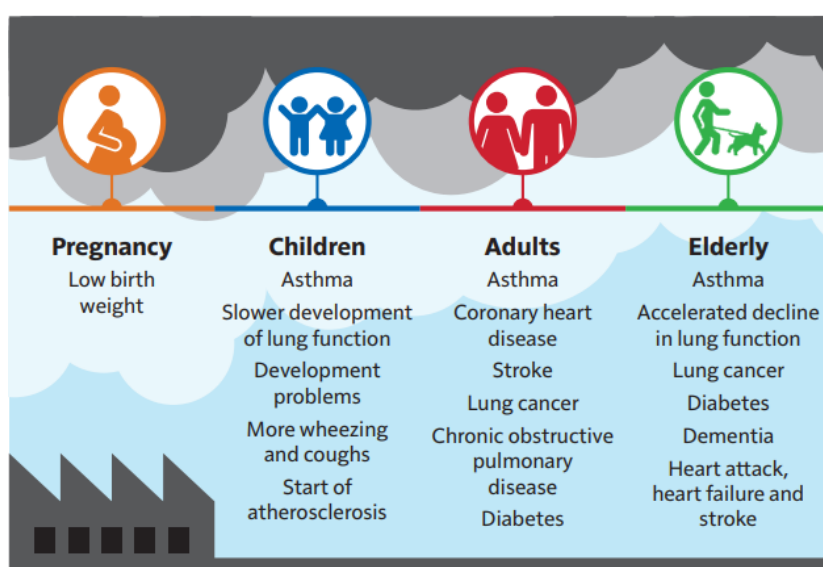


Figure 9. Health effects of air pollution throughout life¹⁴

Alongside this, in 2020 the first person in the UK had air pollution listed as a cause of death, because of being exposed to annual average exceedances of NO₂. Although currently there are no legislative outcomes because of this, this further increases the pressure and duty of care that Local Authorities have to protect their residents. The Prevention of Future Deaths¹⁵ report, that followed Ella Adoo-Kissi-Debrah's tragic death, highlighted the public's low awareness of the about national and local pollution levels including the health impacts. It calls for better communication of these risks from local authorities and healthcare professionals and what people can do about them.

Swale Borough Council will work closely with Kent County Council (KCC) Public Health team on identifying pollution/ deprivation/ vulnerability hotspots. This will help target

¹³ <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-Policy-Guidance-2022.pdf>

¹⁴ PHE. Health matters: Air pollution. London: Public Health England; 2018.

Available from: <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-airpollution>.

¹⁵ <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

communications and focus for the most effective actions in terms of improving public health.

As part of the consultation shown in appendix A, KCC Public Health provided recommendations, some include “to further understand the demographics of Swale’s local population, so that residents affected by poor air quality within the existing AQMAs may be adequately supported”. Another recommendation is to “consider ways of disseminating messages about air quality, especially in poor air quality locations in Swale BC. Communications on air pollution alerts and information directed at vulnerable people (chronic obstructive pulmonary disease and asthma) and information of health effects”.

This is also supported by the successful Air Quality Grant award awarded in 2023. The project is to develop a digital training resource for Health Care Practitioners (HCPs) across Kent and Medway providing training, local evidence and resources to enable practitioners to advise patients with cardiovascular disease or respiratory disease on how to reduce their exposure to air pollution. The aim is for HCPs to integrate information on air pollution into routine practice and create a community across Kent and Medway to support continuous professional development and future collaboration. Support from KCC Public Health will be essential in delivering this project.

Through Defra Air Quality Grant match funding Swale Borough Council currently provides a digital education package called ‘Pollution Patrol’¹⁶. Pollution Patrol is an interactive learning resource, developed for primary schools to raise awareness of the causes and harmful effects of air pollution through fun, engaging and practical strategies that promote less polluting travel behaviour, and empower children to act as advocates for reducing air pollution.

¹⁶ <https://pollutionpatrol.org.uk/>

3.2. Planning and Policy Context

Land-use planning plays an important role in improving air quality, strategically by setting out the broad location for development and locally through individual planning applications. Air quality is a material planning consideration to be reflected in relevant planning decisions.

New policies, plans and guidance factored into this AQAP:

- The Swale Borough Local Plan (2017 – 2031)
- National Planning Policy Framework (2021)
- The Swale Borough Local Plan Review Regulation 19 Document, February 2021 which includes an Air Quality policy (DM 33)
- Swale Borough Council Parking Standards (2020)
- Swale Borough Council Transport Strategy – evidence base (2022 – 2037)
- Annual Status Reports (ASRs) up to the most recent submission in (2022)
- Cycling and Walking Guidance Statement (2018 - 2022)
- Swale Local Cycling & Walking Infrastructure Plan (LCWIP) (2023 –2033)
- Climate Change and Ecological Emergency Action Plan (2020)
- Air Quality and Planning Technical Guidance (2021)
- Defra’s Air Quality Policy (PG22) and Technical Guidance (TG22)

3.2.1. The National Planning Policy Framework

The National Planning Policy Framework, 2021 (NPPF)¹⁷ sets out the Government’s planning policies for England and how these should be applied. It states that the purpose of the planning system is to contribute to the achievement of sustainable development and to achieve this the planning system has three overarching objectives: economic, social and environmental. The chapter on Ground conditions and pollution sets out how planning policies and decisions should factor in Air Quality issues.

¹⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

3.2.2. Swale's Local Plan

The Swale Borough Local Plan^[OBJ] was adopted in July 2017 and contains a number of references to air quality, Action Plans and the Air Quality Management Areas. The Local Plan identifies the need to ensure new developments are assessed for air quality and have nil-detriment (air quality objectives are not compromised) to air quality within AQMAs and are consistent with the local Air Quality Action Plans. The Plan also recommends innovative mitigation measures that may be required to address any impacts regarding air quality (Policies ST5, ST7, A9, A10, A16, A18, A19, MU4, MU5, MU7, DM6, DM10, DM20, CP7). The SBC Local Plan Review Regulation 19 Document (February 2021) includes an Air Quality policy (DM 33) which links with the Councils Air Quality and Planning Technical Guidance, 2021. Swale adapted the KMAQP guidance and produced its own Air Quality and Planning Technical Guidance in Dec 2016 (updated in 2019 and 2021). Through its use in development management, greater acceptance of the importance of air quality in the planning process has been developed and resultant damage costs calculations in larger developments have provided mitigation.

3.2.3. Draft Swale Borough Council Transport Strategy, 2022 – 2037 (evidence base)

The draft Transport Strategy seeks to ensure that sustainable and active travel become real choices for people in the borough, so that the borough can become a less car dependent place.

The Strategy has six overarching objectives:

Objective 1 To promote active and sustainable travel enabling residents to take up these modes.

Objective 2 To reduce and mitigate the impact of poor air quality related to transport whilst striving for net zero.

Objective 3 To improve the journey time reliability and resilience across the transport network.

Objective 4 To support the economic growth and development projected in the Local Plan Review.

Objective 5 To consider the needs of all users across the transport network.

Objective 6 To substantially reduce all road casualties and progress towards zero killed and seriously injured (KSI) casualties.

Part of the evidence base for this Strategy is the Swale's Transport Model. The model has been used to forecast the development and traffic growth in the borough from the base year (2017). In the 'Do Something' scenario, the allocated development can be accommodated with mitigations identified in the Strategy, some of which align with the AQAP measures. The Strategy will be delivered in partnership by Swale Borough Council and Kent County Council (KCC) as the Highways Authority.

3.2.4. Defra's Policy and Technical Guidance 2022 for Local Air Quality Management

In 2022 Defra updated their Technical (TG22)¹⁸ and Policy (PG22)¹⁹ Guidance for Local Air Quality Management. Key updates in the Policy Guidance relate to this action plan, providing clearer requirements for both district and county level councils to work together to ensure air quality is improved, as shown below:

- In paragraph 3.2, chapter 3 - ***“There are obligations on both district and county councils within Part IV of the Environment Act 1995. The Environment Act 2021 ensures that responsibility for solutions to poor air quality is shared across local government”***
- Paragraph 3.8 chapter 3 states ***“The County Council will be required to commit to appropriate actions the county council will take to secure that air quality objectives are achieved”***.
- Paragraph 3.14, chapter 3 states ***“the legislation requires county councils to bring forward measures in relation to addressing the transport impacts for inclusion in any AQAP”***.

¹⁸ Technical Guidance (TG22): <https://laqm.defra.gov.uk/wpcontent/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

¹⁹ Policy Guidance (PG22): <https://laqm.defra.gov.uk/wpcontent/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

3.2.5. Changes to The Environment Act 2021 (Part 1) - Fine Particulate Matter targets

The guidance in section 3.2.4 above encourages greater emphasis being put on measures to reduce PM_{2.5} in support of the recent changes to The Environment Act 2021 (Part 1) which established legally binding duty on government to bring forward at least two new air quality targets. In the Environment Act 2021 (Part 1) - The Environmental Targets (Fine Particulate Matter) (England) Regulations 2022 proposed air quality targets are:

- Annual Mean Concentration Target ('concentration target') - a maximum concentration of 10µg/m³ to be met across England by 2040
- Population Exposure Reduction Target ('exposure target') - a 35% reduction in population exposure by 2040 (compared to a base year of 2018).

At present the new PM_{2.5} targets are not incorporated into Local Air Quality Management (LAQM) and there is no statutory requirement to review or assess PM_{2.5} for LAQM purposes. Whilst the responsibility for meeting the PM_{2.5} targets sits with national government; local authorities have a role to play in delivering reductions in PM_{2.5}.

The Swale Borough Council monitors PM_{2.5} and PM₁₀ at both Newington and St Paul's Street AQMAs. St Paul's Street has now been declared for PM₁₀ exceedances. The Council have undertaken various studies to identify the pollutant source (s) at St Paul's Street. Details of this can be found in section 3.4. The Council and Kent County Council are also reviewing the feasibility of recommended measures, such as traffic management options to reduce PM₁₀ emissions from at St Paul's Street. The outcomes of these will be reported in the Councils Annual Status Reports and any adopted measures will be added to this action plan.

As a Council we are determined to support the national targets and make improvements locally by ensuring measures in this action plan take positive action to reduce PM_{2.5}, as well as co-benefits upon multiple pollutants. Action to tackle PM₁₀ and NO₂ can also be expected to contribute towards PM_{2.5} reductions.

3.2.6. Climate Change and Ecological Emergency Action Plan (2020)

Swale Borough Council declared a Climate and Ecological emergency on the 26 June 2019. The declaration sets the goals for carbon emissions. The action plan outlines the steps the council will take towards making their operation carbon neutral by 2025, followed by the borough in 2030. One of the top ten actions is air quality.

This AQAP takes a collaborative approach with the Council's Climate and Ecological Emergency Action Plan. Officers have previously worked closely with officers from Kent County Council's Highways, Public Health and Active Travel departments to ensure that the measures detailed within this action plan continue to provide a holistic approach to tackling the source of poor air quality, as well as reducing carbon emissions in the borough.

3.2.7. Swale Borough Council Parking Standards (2020)

The Council's Parking Standards (2020) ensures new developments provide the necessary infrastructure to cater for the future demand from ULEVs.

3.3. Source Apportionment

Summary:

This Action Plan update includes data from three separate air quality studies commissioned by the Council for evidence. The most recent source apportionment study, completed in 2021 focused on the concerning trends in PM₁₀ being recorded for St Paul's Street (AQMA 4) and looked specifically at sources of pollutants (NO₂, PM₁₀ and PM_{2.5}). This source apportionment study identified that diesel cars and light good vehicles (LGVs) contributed the highest percentage of emissions (section 3.3.1). The conclusion was supported by the findings of an older source apportionment study completed in 2018 for all AQMAs commissioned for the AQAP 2018 -2022 (section 3.3.2).

The 2018 study showed the traffic data taken from across all AQMA locations (included Key Street located close to Keycol Hill AQMA) on average that 82% vehicle movements were cars, with 15% being LGV and 3% combined OGVs. This is comparable to the St Paul's Street study which showed cars (63%) and LGV (18%)

were also responsible for the greatest contribution of PM₁₀ concentrations. This was similar picture across all pollutants which should mean that any interventions will benefit all pollutants. The 2021 study also identified the fleet mix in Swale in 2021 was an older fleet when compared to the National fleet statistics.

Both source apportionment studies recommended mitigation measures. The 2021 St Paul's Street study recommended incentives for electric vehicle charging/ ownership, a distribution hub and traffic management measures. The 2018 study suggested strategic and localised measures to deliver compliance for all AQMAs by 2022 (excluding Keycol Hill). This earlier study also suggested options of a Clean Air Zone (CAZ) and localised measures such as 20mph zones, car clubs, local business and travel plans.

A third study completed in 2020, specifically considered the feasibility of introducing a CAZ (section 3.3.3). The report recommended a non-charging CAZ, however, this was not supported by the highway's authority although they would support some non-charging CAZ measures which have been included in this AQAP.

3.3.1. Source Apportionment (2021) at St Paul's Street (AQMA 4)

Vehicle Origin Destination (OD) movement and source apportionment analysis was carried out by Swale Borough Council in 2021. The findings of this survey supported the identification of potential mitigation measures within the St Paul's Street (AQMA 4). The study identified that diesel cars and light good vehicles (LGVs) contributed the highest percentage of emissions. This was also identified in the 2018 study for all AQMAs.

A dispersion model was used to predict the percentage contribution of annual mean concentration from each vehicle type within the AQMA for all pollutants (NO_x, PM₁₀ and PM_{2.5}) for the modelled road contribution. The results of that analysis are presented below.

Figure 10 identified that car emissions contributed to 44% of annual mean NO_x concentrations with LGV emissions being responsible for the next highest single

contribution, 21%. HGV's and buses making up the remaining 30% and 5%, respectively.

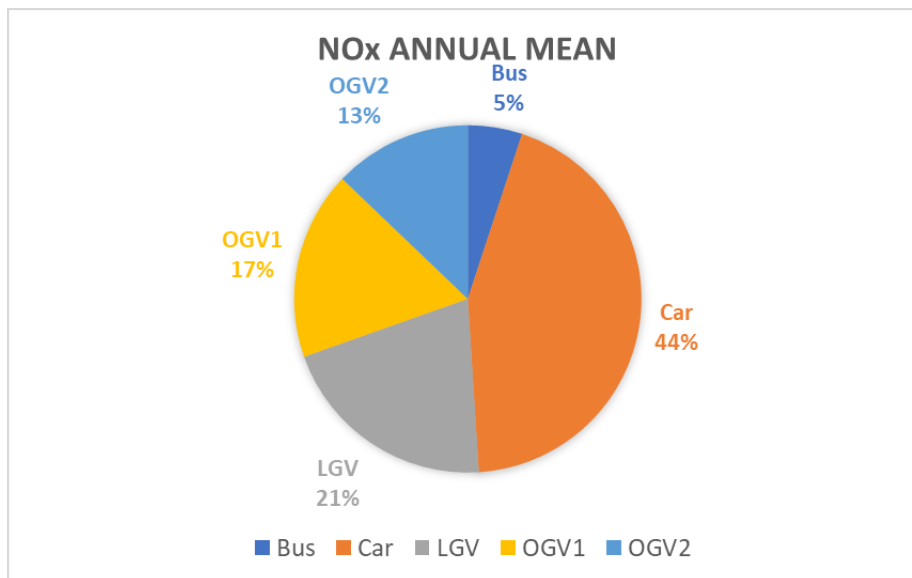


Figure 10. NOx Source Apportionment at St Paul's Street (AQMA 4)

Figure 11 shows cars and LGV's were also responsible for the greatest contribution of PM₁₀ concentrations 63% and 18%, respectively. This is similar to results shown for PM_{2.5} in figure 12, with the remaining 19% made up of 17% from HGV and 2% from the bus fleet.

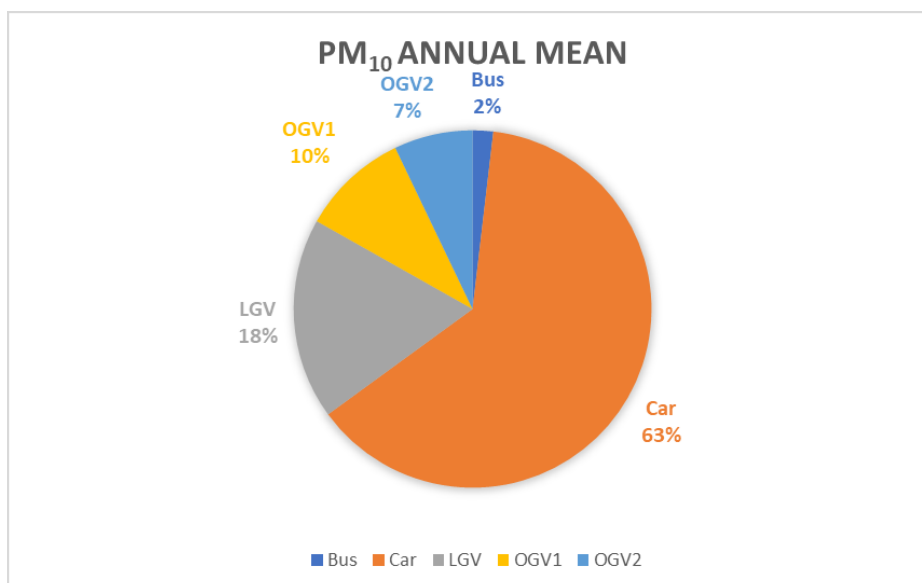


Figure 11. PM₁₀ Source Apportionment at St Paul's Street (AQMA 4)

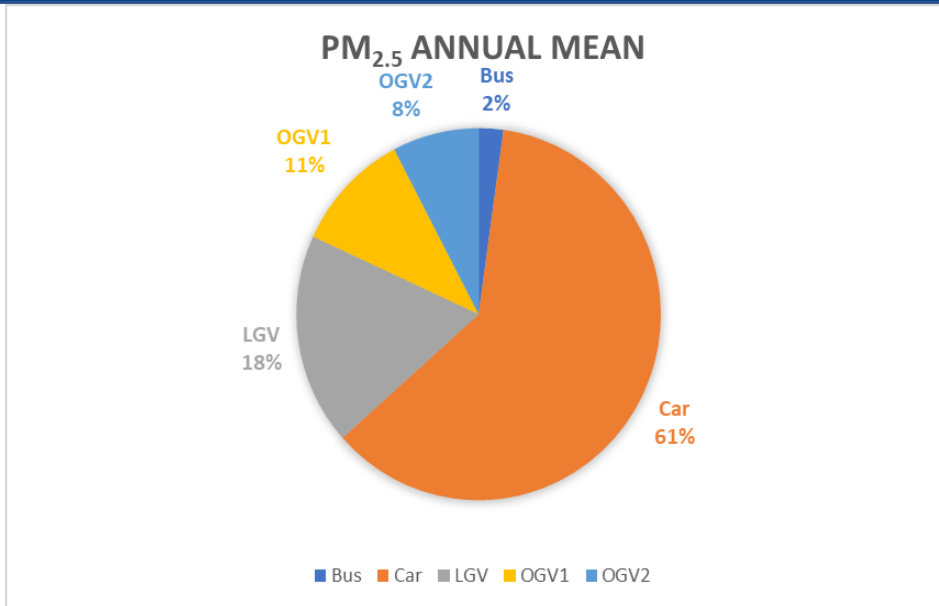


Figure 12. PM_{2.5} Source Apportionment at St Paul’s Street (AQMA 4)

Figure 13 shows the breakdown of each euro class by vehicle type. The ANPR results allowed for the development of a bespoke Emission Factor Toolkit (EFT) which indicated that the fleet mix in Swale in 2021 was an older fleet when compared to the National fleet statistics. An example of this, is the petrol car fleet where 46% of the Swale fleet is Euro 6 or better, compared to the national fleet average of 68%.

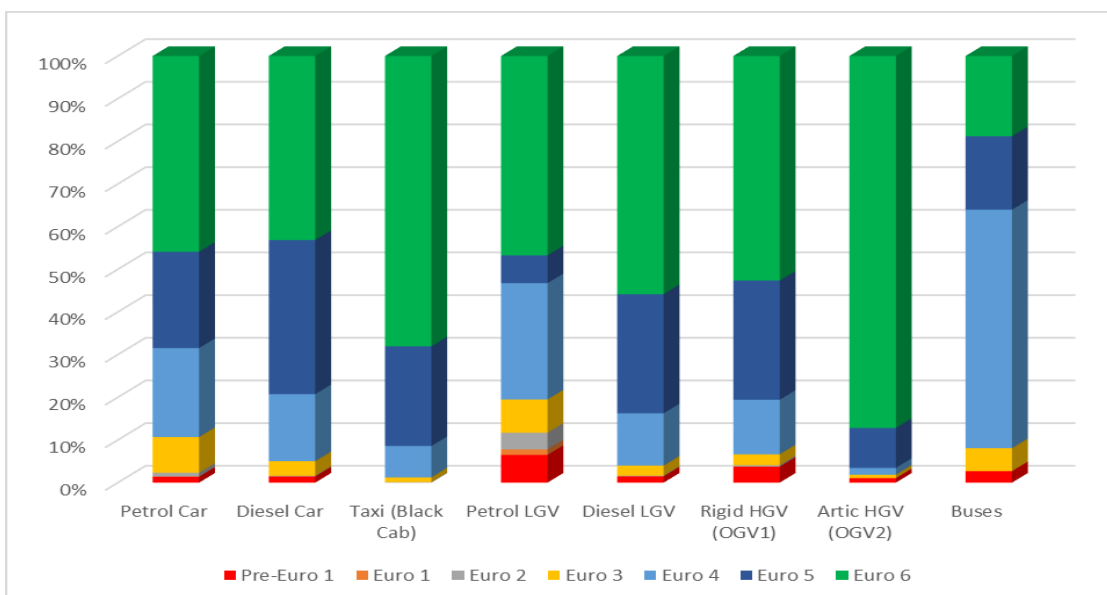


Figure 13. Euro classification by vehicle type at St Paul’s Street (AQMA 4)

From the source apportionment analysis there is a similar picture across all pollutants which should mean that any interventions will benefit all pollutants. The analysis of the source apportionment would indicate that the highest contributor is from car emissions closely followed by LGV then OGV1 and OGV2.

The results of the ANPR survey (2021) and air quality source apportionment analysis identified mitigation measures, such as incentivising electric vehicle charging and ownership, the creation of a distribution hub and effective traffic management to positively impact the AQMA. These are further explained below:

Incentives Electric vehicle charging/ ownership

If this measure were to be introduced this could see the older car and LGV fleet being replaced. This would result in a reduction of both NO_x and PM₁₀ emissions from the tailpipe and reduce potential elevated emissions during peak period when congestion may be an issue.

Distribution Hub

The analysis of the frequency of the same vehicle making multiple trips through the AQMA seems to suggest that there is a much higher incidences of single journeys or single trips in and out of the AQMA, with many of these being of the LGV and OGV1 category. If a Hub were to be introduced this could result in those local trips or deliveries being made by electric vehicles. Resulting in a positive impact on the AQMA but with the potential to have a wider air quality benefit across Swale.

Traffic management

While journey durations data is available for vehicles travelling between ANPR cameras, further analysis or additional data would be required to understand if extended journey times are due to congestion or if the vehicles are stopping and starting a new journey between the two points. Should congestion be identified as being a key issue then traffic management to control queuing traffic within the canyon section of the road may be an option. This has been shown to be an effective measure within other AQMAs. Traffic calming or similar could be introduced to make the route less appealing to those larger vehicles which currently use it. However,

careful consideration would need to be given to ensure the air quality problem was not simply displaced.

3.3.2. Source Apportionment (2018)

A source apportionment exercise was carried out by the Council in at 3 locations (Key Street, Newington and Ospringe) in early 2018. This source apportionment analysis for traffic data taken from across all AQMA locations showed on average that 82% vehicle movements were cars, with 15% being LGV and 3% combined OGVs. The average vehicle movements are similar to those shown in the recent St Paul's Street source apportionment (section 3.3.1).

The ANPR survey at Key Street (A2) showed a typical ratio (percentage) of Euro categories for Cars and LGVs. This location was dominated by a high percentage of Euro 6 HGVs (64%), indicating a newer fleet than other locations.

The ANPR survey at Newington AQMA showed a similar ratio (percentage) of Euro categories for Cars and LGVs to Key Street (A2). The exception is that there was a higher ratio of LGVs Euro 4 and below (30%). This location was dominated by a high percentage of Euro 6 HGVs (56%); however, up to 24% of HGVs were Euro 4 or below.

The ANPR survey at Ospringe AQMA showed a similar ratio (percentage) of Euro categories for Cars and LGVs to Newington AQMA, with a similarly higher ratio of LGVs Euro 4 and below (30%). This location was dominated by a high percentage of Euro 6 HGVs (74%), with only 9% of HGV being Euro 4 or below.

The NO_x source apportionment study (2018) highlighted that targeting key vehicle types such as LGVs and OGVs are likely to produce the substantial NO_x reductions within the AQMAs. However, had highlighted many OGVs and LGV operators are already operating Euro 6 category vehicles, thus the focus should be on older Euro category vehicles.

The 2018 study suggested both strategic and localised measure options. Strategic options included a Clean Air Zone (CAZ) along the A2 corridor with HGV fleet reductions. The report suggested two options, a charging and non- charging CAZ that could be reviewed as a strategic measure for the AQAP. This was investigated through the CAZ Feasibility study in 2020 and the results for this are explained in section 3.3.3. The 2018 study also recommended some locally focussed measures to be considered for the individual AQMAs:

- **Newington AQMA**

Newington is north-east of the A2 and will benefit from a CAZ if implemented.

- **St Paul's Street AQMA**

St Pauls is situated within an urban setting, therefore localised traffic management options such as a 20mph zone ("20 is plenty zone") may benefit local air quality if implemented.

- **East Street AQMA**

East Street AQMA will benefit most directly from the A2 CAZ. Localised measures to be considered may include a local low emission vehicle (LEV) car-club and local school and business travel plans.

- **Teynham AQMA**

Teynham AQMA is directly associated with traffic movements on the A2 in the vicinity north-east of Faversham. It will benefit most directly from the A2 CAZ, however localised measures to be considered may include a local low emission vehicle (LEV) car-club, removal of pinch point parking on the A2 and local school and business travel plans.

- **Ospringe AQMA**

Ospringe AQMA is directly associated with traffic movements on the A2 in the vicinity of Faversham. It will benefit most directly from the A2 CAZ, however localised measures to be considered may include a local low emission vehicle (LEV) car-club, removal of pinch point parking on the A2 and local school and business travel plans.

3.3.3. CAZ Feasibility Study (2020)

This study was a recommendation of the 2018 source apportionment and AQMA options. The CAZ feasibility study²⁰ incorporated some modelling which has provided information for the evidence-based section of this AQAP. The baseline air quality results in 2019 indicated areas where the NO₂ limit value was being exceeded, principally in Sittingbourne at Keycol Hill, St Paul's Street and East Street AQMAs. With a slight exceedance in Ospringe, in relation to the monitoring locations.

As part of the CAZ Feasibility Study various mitigation options were considered relative to air quality benefits (% reduction on NO₂ levels) and forecasted (to 2022) the number of sites still exceeding or at risk of exceeding the Air Quality Objective. In addition, associated costs (in million £) were reviewed. These costs were shown in two ways – by Net Present Value (NPV) and implementation costs. NPV is an assessment of the total cost of an option, not just to the council but to residents and businesses because of an intervention or measure being brought in. In this respect a positive NPV is preferable. There were only two options that had a positive NPV, which was the freight package and pinch point parking. Although those two are positive they have the smallest effect (0.3%) percentage reduction in pollution from the sites. Details on the specific NPV values for each option are explained in the CAZ Feasibility report.

Following two stakeholder engagement workshops, a long list was reduced to a shortlist of six key mitigation options plus two combined packages to be taken forwards for an appraisal on their impact on air quality and an indicative cost benefit analysis. The final CAZ feasibility study considerations are outlined below:

- Modal Shift measures were given a high priority. A lot of work is already on going in this area by both SBC & KCC and this could be built on further with a more joined up approach. It was also felt that means to promote and encourage increased bus usage would be beneficial.
- A non-charging CAZ/Low Emission Zone (LEZ) bundle was also given a high priority and considered to be a viable option. This would build on existing work

²⁰ Report 4: Clean Air Zone Feasibility study (2020) <https://services.swale.gov.uk/meetings/documents/s16026/CAZ%20Appendix%201.pdf>

by both SBC and KCC in terms of modal shift. It would also emphasise other options such as Electric Vehicles which was given a mid- priority (mainly due to existing emphasis already given to this area of work in SBC). Exploration into 20mph zones and traffic calming are also measures that would be beneficial in some areas. In addition, an informative and educative campaign (including formal signage) would be a crucial part of this option.

- The cost of a charging CAZ (CAZ B or CAZ D) outweighed the air quality benefits. It was noted that the cost benefit of health improvements wasn't considered by the feasibility study. Charging CAZs were not considered to be an option to carry forwards for this AQAP update.
- The freight package, although considered innovative was given a very low priority due to anticipated external costs associated with land purchase for freight consolidation centres. It was felt that this option may be better delivered in conjunction with major developments and reviewed in conjunction with Swale Local Cycling and Walking Infrastructure Plan.
- Removing pinch point parking was also given a low priority – it was felt that cost implications were not fully considered in the feasibility study.

A CAZ feasibility study report was presented to Cabinet in 2020 with a recommendation that discussions between SBC and relevant services in KCC take place to review the viability of implementing Swale's preferred measures from the report including a non-charging CAZ. Options for this was given thorough consideration. KCC confirmed that they were unable to support the implementation of a non- charging CAZ along the A2, however they were open to the possibility of taking forward several measures contained within the non-charging CAZ which would contribute to an overall improvement to air quality. For example, actions from the Local Cycling and Walking Infrastructure Plan and traffic management options are now included as actions in this AQAP update.

3.4. St Pauls Street - PM₁₀ exceedances

3.4.1. Overview of monitoring

St Pauls Street was declared an Air Quality Management Area (AQMA 4) for the exceedance of the annual average Air Quality Standard (AQS) for NO₂ in January 2013. An amendment to the AQMA declaration order to include PM₁₀ was actioned in October 2020. In 2018 Swale Borough Council installed equipment to measure PM₁₀ at this site. The data capture from 2019 to 2021 has shown consistent exceedances of the AQS annual allowance of daily exceedances of PM₁₀. The AQS is 35 exceedances of the daily limit of 50 µg m⁻³.

3.4.2. Onsite observations

St Paul's Street sits along the B2006 road within the industrialised area of Swale, with many LGV vehicles transporting materials from particularly dusty environments, such as aggregate, mineral and waste processing industries. An HGV lorry park is also located close by which currently doesn't have hard surfacing, and currently under review in the planning process.

The B2006 is busy road as it is the main through route to retail and business units in the Milton Creek area with a direct link through the Bobbing junction to the A249. In addition, smaller more isolated business units on Staplehurst Road and Chalkwell Road increase the commercial movements. The B2006 narrows east of the Chalkwell Road roundabout, as it becomes St Paul's Street. The congestion at this location is exacerbated by vehicles, particularly HGVs, turning into Chalkwell Road, being unable to exit the roundabout due to parked vehicles consequently blocking the movement of traffic from St Paul's Street.

3.4.3. Research projects completed to identify PM₁₀ sources at St Paul's Street

Project 1: Assessment of fugitive emissions from industry

The research project, using the R OpenAir package, aimed to identify if a relationship exists over time between wind direction and frequent exceedances of the 24-hour objective for particulate matter (PM₁₀) at St Paul's Street. As it was possible the results could identify a dominant wind direction and location of source (s) relative to

the trends. However, the project was unable to determine with any certainty which sources of PM₁₀ are leading to exceedances of the daily mean objective.

Project 2: Vehicle Origin Destination (OD) movement and source apportionment analysis

The modelling results suggested that the elevated levels of PM₁₀ measured within the AQMA may not be due to road transport emissions in isolation but may be due to emissions from other sources. Other source apportionment results are shown in section 3.3.1.

The report noted an interesting anomaly with the air quality readings. The normal correlation between vehicle sourced emissions for NO₂ and PM₁₀ did not occur. In other words, the normal fluctuations of peaks in NO₂ should roughly be followed by peaks in PM₁₀. Instead, PM₁₀ showed high readings even when NO₂ were low. The consultant recommended the council to undertake additional real time measurements in other locations within the AQMA to better understand the spatial extent of the particulate emissions. This is underway but is not specifically included in the AQAP measures.

The above findings may also suggest another source could be non-exhaust emissions (NEE). NEE from road traffic refers to particles released into the air from brake wear, tyre wear, road surface wear and resuspension of road dust during on-road vehicle usage. These emissions arise regardless of the type of vehicle and can contribute to the total ambient particulate matter.

Advice from the Air Quality Expert Group for reducing NEE:

The most effective mitigation strategies for NEE are to reduce the overall volume of traffic, lower the speed where traffic is free-flowing (e.g., trunk roads and motorways), and promote driving behaviour that reduces braking and higher-speed cornering. Resuspension of particles from the road surface can be lowered by reducing the material that is tracked onto public road surfaces by vehicle movements in and out of construction, waste-management, and similar sites.

The St Paul's Street study recommended a range of potential mitigation measures based on the source apportionment analysis or traffic split:

- Incentives for electric vehicle charging/ ownership
- Distribution Hub - The distribution hub will be reviewed as part the councils LCWIP
- Traffic management to control queuing traffic within the canyon section of the road, this has been shown to be an effective measure within other local authority AQMAs, for example, traffic relief options for a one-way streets system; parking restrictions; additional parking; minor walking & wheeling improvements and other traffic calming options, to make the route less appealing to larger vehicles, however, this would require KCC approval and implementation.
- Recommendation for Swale undertake additional real time measurement in other locations within the AQMA to better understand the spatial extent of the particulate emissions.

Project 3: Additional real time measurements in other locations within the AQMA to better understand the spatial extent of the particulate emissions.

The Environmental Protection Team are completing a research project using a low-cost particulate sensor to identify and compare PM₁₀ at the air quality monitoring station to another location along St Paul's Street. This project will allow us to see if the receptors along St Paul's Street are experiencing the same high concentrations in PM₁₀ and to better understand the spatial extent of the particulate emissions.

3.5. Required Reduction in Emissions

The improvement in road NO_x emissions to meet the objective at monitored locations where concentrations exceeded the objective in 2019, is shown in Table 7, categorised by AQMAs.

As set out in LAQM Technical Guidance TG22, Chapter 7, paragraph 7.107, any required percentage reductions of local emissions should be expressed in terms of NO_x due to local road traffic. This is because the primary emission is NO_x and there is a non-linear relationship between NO_x concentrations and NO₂ concentrations. The following calculations use the 2019 monitored NO₂ concentrations presented in the Annual Status Report 2020, and the methodology set out in TG16, chapter 7, Box 7.6. Percentage Decrease in Road NO_x required to Meet Annual Mean NO₂ Objective at Relevant Modelled Receptors (µg/m³) in 2019 are shown below. The equivalent reduction in NO₂ required is also provided for reference.

Table 7 demonstrates that we must achieve reductions on road NO_x of between 10% and 45% to achieve the government's current air quality objectives. A 15% decrease in 2019 road NO_x emissions is required to meet the objective at the worst-case diffusion tube in AQMA 1 (SW42). In AQMAs 4 and 6, approximately 40% reduction in road NO_x emissions is required to achieve the objective, based on 2019 emissions. No exceedances in East Street or Teynham, so no reductions required.

Apart from the exceedance for PM₁₀ at St Paul's Street and Keycol Hill for NO_x the general trend over the last four years to 2021 is one of improving air quality in the AQMAs. This does need cautious interpretation, given the potential pandemic impact on traffic movements during this period. Additional updates can be added to this action plan once the most recent 2023 ASR is completed and approved. Section 2.4. provides additional information on the general air quality trends within Swale.

Diffusion Tube	Annual Mean Contribution ($\mu\text{g}\text{m}^{-3}$)		
	Monitored NO_2 Concentration	% Decrease in Road NO_x to Meet Objective	% Decrease in Road NO_2 to Meet Objective
AQMA 1 Newington			
SW35	42.5	10.4 %	9.3 %
SW42 (triplicate)	43.9	15.4 %	13.8 %
AQMA 4 St Pauls Street			
SW82	53.1	40.8 %	37 %
AQMA 6 Ospringe			
SW28	43	11.7 %	10.5 %
SW95	54.3	40 %	35.8 %
SW22	42.4	9.6 %	8.5 %
SW29	40.9	3.8 %	3.4 %
Keycol Hill / Key Street			
SW124	52.3	39.5 %	35.8 %
SW130	55.5	45.4 %	41.2 %
SW131	55	44.6 %	40.4 %
SW121	42.7	12 %	10.9 %

Table 7. Percentage Decrease in Road NO_x required to Meet Annual Mean NO_2 Objective at Relevant Modelled Receptors ($\mu\text{g}\text{m}^{-3}$) in 2019

Strategic measures outlined within this AQAP will contribute to further emission reductions with some specific measures directed at the above AQMAs such as measures 8 (AQMA traffic management options) at St Paul's Street and measure 11 (work in partnership with Medway Council and KCC to agree mitigation and mechanism to manage transboundary impacts from development on air quality between Newington and Rainham) for Keycol Hill AQMA.

Some measures outlined in section 5 have specific timelines for delivery and others are still in the planning and development phase. Those with specific delivery dates confirmed are predominantly behaviour change measures, which are extremely hard to predict and quantify the impact for and that a significant amount of uncertainty will be present. Therefore, these measures have not been modelled. Other measures such as AQMA traffic management options will undergo quantification of the emission impacts and the outcome of these assessments can be added to the AQAP at a later date and reported on via the Annual Status Reports.

3.6. Key Priority themes

Key priority themes, identified from the evidence above, have been integrated into the actionable measures to deliver compliance with Air Quality Objectives (AQO) for the AQMAs. This will improve air quality within the district as whole. The themes are not numbered relative to their importance.

Theme 1 - Public Health and Wellbeing (Health Promotion, Public information, Behaviour change/modal shift,)

We want to protect those most exposed and vulnerable to air quality impacts. Improving air quality is largely driven by a change in attitude and travel behaviours, and as a Council, we have strong role in encouraging and facilitating this change. We aim to continue to inform health impacts associated with poor air quality and provide information and guidance to our residents as to how they can protect themselves and be part of the solution.

Theme 2 - Active Travel, Public Transport and Low Emission Vehicles

Encouraging the uptake of alternatives to the car through improving cycling and walking opportunities, supporting sustainable public transport, car clubs, travel plans, electric vehicles, improving the electric vehicle charging infrastructure and other initiatives.

Theme 3 – Transport, Transport Planning and Traffic Management (Traffic management, Licensing, Parking, and Public Transport)

The Council will work with its wider strategic partners, such as Kent County Council, on matters of traffic management and public transport that extend beyond the SBC's direct control. This will help mitigate existing areas of traffic and transport issues, whilst also allowing us to seek opportunities for alternatives and improvements.

Theme 4 - Local Planning Policy and Development Management

Various policy documents are already in place within the Council. It is therefore considered important to utilise these and introduce mutually beneficial measures as key mechanisms to reduce emissions from road transport. Also, to continue to develop Air Quality standards and guidance within the Local Plan Review and the Air Quality Planning and Technical Guidance.

4. Development and Implementation of Swale Borough Council AQAP.

4.1. The AQAP framework approach

Swale Borough Council has declared six AQMA's for exceedances of the annual average Air Quality Standard for nitrogen dioxide (NO₂) with one AQMA (St Paul's Street) recently being amended to include particulate matter (PM₁₀). Five of the AQMA's declared since 2009 have had separate AQAPs developed for each location. The previous interim AQAP framework approach was designed to bring together the pre-existing AQAP measures and develop a strategic approach under one AQAP. Due to the location of the AQMAs, either being adjacent to or near to the A2 strategic route through Swale, there are several action plan options and measures common to all the AQMA's within Swale which form the basis of a range of strategic measures developed to deliver improvements across the borough. These will be complemented by some locally focussed AQMA measures to consider local conditions, circumstances and community views.

This framework approach follows the approach recommended in Defra LAQM TG (22)¹⁴, chapter 2, paragraph 2.6 which states: "*Where a local authority has designated multiple AQMAs in its area, particularly if these are related to a similar emissions source, it is advised that a single AQAP should be submitted, but this should clearly address each individual AQMA in the area*"

A Strategic AQAP will provide Swale Council with an Action Plan that includes:

- Strategic borough-wide AQAP measures
- Incorporate local focused AQMA measures
- Strategic partnership working through a wider strategic AQAP Steering Group including Task and Finish groups for some measures and local AQMA community groups.

4.2. Consultation and Stakeholder Engagement

In updating this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 8. As part of the AQAP update SBC provided an online consultation and undertaken the following stakeholder engagement:

- Social media and the Council’s website
- Letters distributed directly to households within and near the AQMAs. These included a link to the consultation through the SBC website address and a QR code, as well as the option to request a printed questionnaire.
- Swale news Business e-Bulletin and mailing lists to businesses and statutory consultees.
- Flyers were also distributed to libraries and shown on communal community centre screens.

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

Table 8. Consultation Undertaken

Yes/No	Consultee
No	the Secretary of State
Yes	the Environment Agency
Yes	the highways authority
Yes	all neighbouring local authorities
Yes	other public authorities as appropriate, such as Public Health officials
Yes	bodies representing local business interests and other organisations as appropriate

4.3. Steering Group

The AQAP Steering Group was formed in early 2022 to develop and deliver the Strategic AQAP update for Swale. The Steering Group will also be responsible for the implementation and monitoring of the delivery of the AQAP to ensure measures are kept on-track and report progress back to Defra.

The Steering Group is composed of Swale and KCC officers from key service areas that can influence and impact air quality improvements. The Steering Group is led by senior officers within Swale Borough Council to ensure engagement at political and senior management levels across the Council and with external partners continues. The steering group include representatives from:

SBC Environmental Health

SBC Development Management Team

SBC Economic Development Team

SBC Planning Policy

SBC Active Travel and Climate Action Officers

SBC Director of Resources

Kent County Council (Highways, Public Health, Planning and Public Right of Way).

The Steering Group assessed the AQAP options proposed, including a review of the 2018 – 2022 AQAP measures, including the recommended measures from the CAZ Feasibility and Source Apportionment studies shown in section 3.3. The group also collaborated to identify what traffic management interventions were required; what may influence the local pollution in the future (i.e., five to ten years); and other existing projects in Swale that could contribute to emission reductions (or increases).

Greater consideration was placed on measures that Swale can deliver and influence within the time frame of the action plan. For example, amending Swale policies, development of strategies for use in development control and government or county funding opportunities. The steering group review also considered the viability of measures and used cost benefit analysis to prioritise measures relative to the cost effectiveness, air quality and non- air quality benefits.

The steering group agreed provisional timescales for the implementation of the proposed measures, how measures will be monitored for both air quality and non-air quality benefits using surveillance monitoring, such as possibly commissioning the installation of walking and cycling counters in fixed or mobile positions, work with volunteer groups to record active travel journeys to measure the success of specific active travel improvements including air quality monitoring and traffic counts.

The steering group will meet quarterly every three to four months throughout the lifetime of this action plan. Task and finish sub-groups who will be responsible for implementing and delivering specific measures will meet more regularly and report back to the steering group.

5. AQAP Measures

The measures in this action plan focus on improving air quality across the whole borough, as well as in our six air quality management areas (AQMAs). The AQAP includes a package of measures that have been prioritised relative to their viability, cost effectiveness of air quality and non- air quality benefits. Appendix D shows the metric used to prioritise measures and rag rating for delivery of measures. The LAQM Toolkit²¹ from TG22, Annex A, Table A.1 has been used as a guide for the effect on reducing NO_x and PM₁₀ emissions for each measure.

Table 9 shows the Swale Borough Council AQAP measures. The AQAP measure tables contain:

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

NB:

- Please see future ASRs for regular annual updates on implementation of these measures.
- Information on why some measures have been amended, removed or not included can be found in appendix B.

5.1. Strategic and localised measures

The proposed measures set out in this AQAP are predominantly strategic with some localised measures such as AQMA specific traffic management options and EV charging.

²¹ LAQM Measures Toolkit: <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

5.2.1 Plans set under each measure

The feasibility of each measure has been assessed and measures that are deliverable have been included in the AQAP update. Some measures have specific timelines for delivery, others are still in the planning and development phase.

Each measure will have a plan providing specific details of what needs to be accomplished, who is responsible for completion, what steps need to be taken to achieve it and funding opportunities (if applicable). These will be managed by task and finish working groups which will include relevant SBC and KCC officers. Each measure will also be monitored in alignment with key performance indicators. Appendix C provides information on monitoring options for each measure. Below provides information related to measures, their priority scoring and consultation feedback.

Measure 1 - Continue to develop Air Quality standards and guidance within the Local Plan Review and the Air Quality Planning and Technical Guidance:

Measure 1 incorporates essential planning resources to ensure air quality standards, policy and guidance for improving air quality are delivered in the lifetime of the action plan (details on progress to date can be found in table 9). This 'medium term' (<5 year) measure is active, with a 'high' cost effective and feasibility scoring, a medium air quality, and non-air quality impacts at a low cost to the Council.

As part of the public consultation this measure was considered the highly achievable with 63% of all respondents answering this way. It was also felt to have the potential for greatest impact with 45% responding major or moderate impact.

Measure 2 - Complete a Local Cycling and Walking Infrastructure Plan (LCWIP) for the district and work with KCC to improve of Swale's walking and cycling infrastructure.

Measure 2 provides a roadmap for investment in active travel improvements. This investment has several co-benefits including tackling air pollution, noise pollution, the health crisis, the climate & ecological crisis, the cost-of-living crisis, as well as reducing congestion, so improving the economic prospects of the borough. But ultimately, the active travel investment road map will restore the balance on our streets away from cars, back to people, creating nicer places to be with liveable

neighbourhoods; streets where we can play, meet & chat; places where we all feel safe and comfortable. This active travel investment road map integrates with measures 7, 10, 12 & 13.

This 'long term' (>5 year) measure was prioritised as 'medium' scoring measure because it provides 'high' non-air quality impacts, with a 'medium' cost effectiveness score. For air quality improvements it was given medium impact, as air quality benefits are variable. This is because district and county council partners can improve the walking and cycling infrastructure, however, to ensure an air quality improvement are made it requires a dual factor dependent on a public behaviour change and pressures of convenience. Practicality was also considered and with this measure already underway it was given a high feasibility score.

As part of the public consultation this measure was considered the highly achievable with 60% of all respondents answering this way. It was also felt to have the potential for with 37% responding major or moderate impact.

Measure 3 - Air pollution alerts, information and to raise awareness on impacts and solutions

This measure is supported through multiple areas of work the council will be doing to provide alerts, information and to raise awareness of the air quality impacts and solutions. The Council and Kent Partners have already established the 'Kentair' website which free air pollution alerts and information. Emails are issued whenever air quality is forecast 'Moderate' or above for the following day. The email includes Defra's recommended actions and health advice. This will continue to be funded as part of this AQAP. This measure includes joint working with the Kent and Medway Air Quality Partnership on improvements of the website and promoting air quality related messaging, for example, through Kentair week and Clean Air Day.

This measure can also encourage active travel in drivers, both commercial and private vehicle owners. Various promotional events will take place via social media, Green Schools Forum, Swale Means Business e-Bulletin and mailing lists. This will require interdepartmental working with SBC and KCC communication teams and Kent and Medway Air Quality Partnership members.

This 'short term' (<1 year) measure is ongoing and already active, so was given a 'medium' cost effectiveness and 'high' feasibility scoring, with 'low to medium' air quality and non-air quality benefits at a 'low' cost. However, impacts will vary related the type of project or promotion that is completed for this measure.

As part of the public consultation the Air pollution alerts measure was considered the highly achievable with 66% of all respondents answering this way. It was also felt to have the potential for with 36% responding major or moderate impact.

The Promote and encourage active travel and change of transport modes measure was considered less achievable as a measure on its own. This has been integrated into the air pollution alerts, information and to raise awareness on impacts and solutions measure.

Measure 4 - To apply for Defra Air Quality Grant scheme to facilitate future funding for most suitable AQAP measures

This measure will ensure the Council continues to apply Defra Air Quality Grant scheme to facilitate the most suitable AQAP or supporting measures. Recent successful grants include:

- In 2022 'Pollution Patrol'²² was launched. This is a free interactive website for primary schools, children and their families developed to help raise awareness of air pollution, the damage it can cause and ways that individuals can help to reduce their impact by changing behaviours. The website includes games, an immersive 360 story mode, curriculum-linked teaching resources and a school assembly plan amongst other elements.
- In 2023 the MidKent Partnership received funding for a 5-year project to develop a digital training resource for Health Care Practitioners across Kent and Medway to enable practitioners to advise patients with cardio-vascular disease or respiratory diseases on how to reduce their exposure to air pollution.

This measure was given a 'medium' cost effective score because it is considered a low cost, with high public health benefit. Reason for this, is that the Council must

²² <https://pollutionpatrol.org.uk/>

match fund projects by 10% of the full amount. Therefore, the cost can be lower and can be done jointly through our Midkent Partnership and neighbouring authorities. This measure is also highly feasible.

This measure has since been added and was not included in the public consultation. The steering group felt it was essential that this measure is included to ensure it continues to be completed each year to improve air quality and public health.

Measure 5 - To reduce emissions from activities with Environment al Permits

Under regulation Reg 13 (Grant of an Environmental Permit) of the Environmental Permitting (England and Wales) Regulations 2016 (as amended), the Council must regulate certain types of factory and industrial activities that produce polluting emissions into the air. The permitting scheme enforces industry to reduce any air pollution they may cause and to help improve air quality. Local authorities decide whether to give a permit. If they do so, they must write down how the air pollution is to be minimised. The premises are known as "installations". These can be known as 'Part B' or 'Part A2' installations. 'Part B' directly relates to emissions to air and is only enforced by local authorities, giving the Council a direct link to industry and a strong understanding of what, and how much, pollution is being emitted through enforcement activities. Installations are required to ensure Best Available Techniques (BAT) measures are used to reduce emissions.

This measure was given a 'high' cost effective score because it is considered a low cost to the Council with 'medium' air quality impacts. This measure is also highly feasible, as it is currently active.

This measure has been added in line with recommendations outlined in the LAQM Toolkit from TG22, Annex A, Table A.1, as it shows emission reduction from permitting can be considered in the AQAP. The Council complete permit inspections for installation and can provide data relative to emission reductions via Defra returns. Where an installation is located close to sensitive receptors, such as housing or an Air Quality Management Areas, a higher risk score can be applied at the risk assessment stage, resulting in more stringent enforcement and more regular inspections, thus improving air quality.

Measure 6 - “20 is plenty” zones - to be monitored and reviewed for AQMAs

Faversham town centre and Newington area now has 20 mph speed limit applied as safety measure and to encourage active travel. The air pollution impact is unknown; therefore, the Council will assess changes PM₁₀, PM_{2.5} and NO₂ with continuous monitoring at Newington to see if any long-term air quality changes occur within the AQMA. Other AQMAs can be reviewed in response to the findings.

This ‘medium term’ (<5 year) measure was given a ‘medium’ cost effectiveness score because it is considered a ‘low’ cost measure with ‘low’ air quality and ‘medium to high’ non-air. This measure is also highly feasible as it is currently active.

This measure was considered the most achievable traffic and transport measure with 48% of responding this way. However, it was felt to have the least potential for impact with 47% responding slight impact or no impact.

Measure 7 - Continue to improve and develop the EV infrastructure in line with the Electric Vehicle Strategy 2022-2030.

The Council has already started improvements with new charging spaces within the district, as well as electrifying its own fleet. The EV strategy has actions that will contribute to an improvement to the EV infrastructure within the district. This measure will align with the Councils plans to improve EV infrastructure via the EV Strategy and through development using the Parking Standards SPD.

This ‘medium term’ (<5 year) measure was given a ‘low’ cost effective and ‘high’ feasibility scoring, with a ‘low’ air quality and non-air quality impact score, at a ‘high’ cost.

This measure was considered the most achievable with 65% answering this way Active Travel & Low Emission Vehicles section. It was felt to have the potential for greatest impact with 41% responding major or moderate impact.

Measure 8 - Explore AQMA specific traffic management options

Discussions have taken place between SBC and KCC highways in relation to traffic management mitigation options for the AQMAs. A lot of the AQMAs along the A2 are restricted, in what can be changed due to the road layout, however options are still

being considered. More traffic management options are being considered for the B2006 road along St Paul's Street as it is located off the A2 corridor. A feasibility study for this will be completed to support any decisions made.

This 'medium term' (<5 year) measure was given a 'medium' cost effective and feasibility scoring, with 'medium' air quality and non-air quality impacts, at a 'medium to high' cost. The effectiveness will vary dependent on which measure is taken forward following the feasibility study.

It was clear that more detail is required for this measure as 38% of people answered unsure and 36% agreeing it was achievable. The Council are reviewing traffic management options but cannot confirm these until further evidence has been collected.

Measure 9 - Continue anti-idling enforcement and educational campaign

Swale Borough Council has worked with residents, schools and parish councils to identify several hotspot locations in the borough where drivers regularly leave their engines idling. Most of these are located outside of schools during afternoon pick up times, as well as high streets and town and village centres. The hotspot areas are clearly signed with a total of 70 signs installed within the district. The Council has also carried out patrols across these hotspots with the aim to raise awareness, but drivers fail to switch off their engines when asked can be issued with a £20 fixed penalty notice.

This 'short term' (<1 year) measure which was given a 'medium' cost effectiveness and 'high' feasibility scoring, with 'low' air quality and non-air quality impacts at a 'low' cost.

The results from the consultation 49% answered it would be achievable from the total of 145 responses. Comments were made that this was an affordable measure, however they were unsure on what the impact would be.

Measure 10 - Car clubs and EV bike hire schemes in development and public spaces in line with SBC EV Strategy and CEE plan.

This measure is underway and will continue to expand spatially. Faversham Car Club was launched successfully and has shown to be popular with regular usage. A recently launched car club for Sittingbourne established and Isle Sheppey will be reviewed. Car clubs are encouraged in new development.

This 'medium term' (<5 year) measure was given a 'low' cost effectiveness and 'high' feasibility scoring. With 'low' air quality and non-air quality impacts at a 'medium' cost.

This measure was least popular within the public consultation overall, but this was at demographic discretion with a linear relationship between age and feeling around the achievability. The proportion respondents showed achievability decreasing as age increased.

Measure 11 - Work in partnership with Medway Council and KCC to agree mitigation and a mechanism to manage transboundary impacts from development on air quality between Newington and Rainham.

The Council are looking into how we can work with Medway Council for a joint air quality mitigation strategy or mechanism to manage transboundary air quality impacts from development. This stems from previous air quality assessments that have identified transboundary air quality impacts between Newington/ Keycol Hill and Rainham development sites.

This 'long term' (>5 year) measure was given a 'low' cost effective and 'medium' feasibility scoring, with 'low to medium' air quality and non-air quality impacts, although at a 'medium to high' cost.

Consultation

Measure 12 - Explore opportunities for EV charge points at AQMA's: Newington (Village Hall), Ospringe (SBC car park), East Street (Tesco car park or nearby schools) St Paul's Street (businesses nearby); Teynham (Parish car park)

The Council will work with Parish Councils to assess the option of installing EV charge points within each AQMA or nearby area. The Council will identify funding opportunities for these projects to assist in the set-up of the charge points.

This 'medium term' (<5 year) measure was given a 'low' cost effectiveness and 'medium' feasibility scoring. With 'low' air quality and non-air quality impacts at a 'medium' cost.

As part of the public consultation this measure was considered the most achievable with 65% responding this way. It was also felt to have the potential for greatest impact with 41% responding major or moderate impact.

Measure 13 - Public transport improvements to bus infrastructure/service

There are significant pressures on the public transport network with usage significantly lower since the Covid pandemic and lack of funding opportunities to improve the service. Swale Borough Council are committed to supporting public transport providers in a lobbying role for improvements to infrastructure and service improvement. As well as partnership working and recommendations through developer S106 contributions.

This 'long term' (>5 year) measure was given a 'low' cost effective and 'low' feasibility scoring. With 'low to medium' air quality and non-air quality impacts, although at a 'very high' cost.

From the public consultation it was felt this measure had the potential for greatest impact with 46% responding major or moderate impact but was considered the least achievable from the responses.

Table 9. Air Quality Action Plan Measures

Measure No.	Measure	Lead department	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Continue to develop Air Quality standards within Local Plan Review and KCC development control policies	Planning Policy and Development (SBC/KCC)	Policy Guidance and Development Control	Local Plan Review; Air Quality Policy and other policies; Air Quality Planning and Policy Guidance; Low Emissions Strategy	2024	Ongoing	SBC and KCC planning policy	Staff costs	Funded	n/a	Ongoing	Lower NOx and PM10 emissions - Air Quality standards to reduce district-wide emissions	Implementation of policy and planning responses	SBC Parking Standards SPD includes requirements for Parking for Ultra Low Emission Vehicles with the objective of improving air quality. Air Quality and Planning Technical Guidance document (2021) updated as policies and guidance evolves	Air Quality will be considered in the site selection for allocations. The emerging Local Plan will include a policy on Air Quality. Air Quality policy (DM 33)
2	Complete a Local Cycling and Walking Infrastructure Plan (LCWIP) for the district and work with KCC to improve of Swale's walking and cycling infrastructure	Culture and Places (SBC) and Active Travel Interventions (KCC)	Transport Planning and Infrastructure	Cycle network	2034 (10 year plan for SBC implementation measures)	2024	SBC (Active Travel; GIS and Planning) and KCC (PRW, Highways)	Developers & highway infrastructure funding. Apply to Defra Air Quality Grant scheme – unknown outcome	LCWIP Partly Funded. No present funding for future measures	£10k-£20k plus additional cost for future measures (to be confirmed)	Stage 2	n/a	Completion of improved walking and cycle routes	Managed by the Active Travel Coordinator. The plan has completed Stage 1, with Stage 2 to 4 still to be completed.	Funding resources to complete Stages 3 (network planning) & 4 (prioritisation of measures) could delay completion. Need LCWIP to apply for future funding of measures.
3	Air pollution alerts, information to raise awareness on impacts and solutions	Environmental Health (SBC)	Public Information	Via the Internet, leaflets and other mechanisms	Active	Ongoing	MidKent Partnership and Kent and Medway Authorities	SBC budget for website and data management	Funded	Approx. <£1000 per year plus staff costs	Active	Lower NOx and PM10 emissions	Number of (vulnerable) people using the alert service in Swale	Kentair website has free air pollution alerts and information. Emails are issued whenever air quality is forecast to be moderate or above for the following day. The email includes Defra's recommended actions and health advice. There are currently 336 registered users for the email service.	Kent and Medway local authorities have been awarded a DEFRA AQ Grant funding to deliver an online tool for health professionals to use to assist patients with CHD/COPD in navigating air quality information.

														Through match funding DEFRA AQ Grant - SBC now provides a digital education package 'Pollution Patrol'. This resource is aimed at children aged 5-11 (and their parents).	Kent and Medway Partnership Group have created a communication subgroup - attendees include various district councils, Kent County Council and Public Health representatives.
4	To apply for Defra Air Quality Grant scheme to facilitate funding for the most suitable AQAP measures	Environmental Health team	Not determined	Not determined	n/a	Ongoing	SBC	Defra and SBC match funding	Part Funded	to be confirmed	to be confirmed	Lower NOx and PM10 emissions in AQMA(s) and public health benefits	Number of successful Defra bids	As above two successful Defra bids through match funding: 1. digital education package 'Pollution Patrol' and 2. Online tool for health professionals to use to assist patients with CHD/COPD in navigating air quality information.	Match funding affordability
5	To reduce emissions from activities with Environmental Permits	Environmental Health team	Environmental Permits	Measures to reduce pollution through Best Available Technique (BAT)	2023	Ongoing	SBC	SBC staff cost	Funded	n/a	Active	Lower NOx and PM10 emissions in AQMA(s)	Number of measures and performance monitoring data	SBC currently review a case load of installations	
6	"20 is plenty" zones - to be monitored and reviewed for AQMAs	Environmental Health (SBC) for monitoring AQ changes	Traffic Management	Strategic highway improvements	2022	2023	KCC and SBC	SBC staff costs	Funded	n/a	Active	Lower NOx and PM10 emissions - impact unknown - being viewed	Smoothing Traffic flow to reduce emissions plus more people walking and cycling	Faversham town centre and Newington (including A2 - AQMA) now has 20 mph speed limit	Newington AQ and 20 mph will be assessed through continuous monitoring to assess long-term air quality changes within the AQMA and potential impact of speed change.
7	Continue to improve and develop the EV infrastructure within the district	Environment and Leisure (SBC)	Promoting Low Emission Transport	Low Emission Vehicles, EV recharging	2022	2030	SBC and KCC Network Innovations	OZEV (ORCS & LEVI); SBC; Private Investment	Received funding from ORCS 2022/23 – provided 75% of the funding for 20 EV charge points spread across the borough; Future funding for LEVI being investigated with KCC for on street EV's - Funding to be confirmed	£500k - £1 million	Implementation	Lower NOx and PM10 emissions	No. charge points/ No. charge points per population	18 new charging spaces by Sep 22 (+ 18 existing spaces from 2022 works)	Difference in strategy between SBC & KCC could be a barrier. DNO costs and grid capacity also is a barrier

8	Explore AQMA specific traffic management options	Highways and Planning (KCC), Environmental Health and Planning Policy (SCB)	Traffic Management	Strategic highway improvements	2025	2028	SBC and KCC highways	S106 available for St Paul's Street.	Part funded	£50K - £200K	Planning	Lower NOx and PM10 emissions in AQMA(s)	Number of measures and performance monitoring data	Planning stage	KCC highways facilitated projects and measures. Lack of engagement and support from KCC highways. SBC are undertaking a scoping assessment with external transport consultants to assist KCC in reviewing traffic management measures.
9	Continue anti-idling enforcement, signage and educational campaign	Environmental Health (SBC)	Traffic Management	Anti-idling enforcement	2022	Ongoing	Environmental Response Team (SBC)	SBC budget and S106	Part funded	<5k	Ongoing	Lower NOx and PM10 emissions at hotspot areas	Sustainable business, cleaner greener Swale	43 signs installed in 2021 and 27 new locations in 2023 with additional enforcement patrols at hotspot locations. Mainly around schools. Working with some schools to engage with parents	Staffing and funding resources for enforcement patrols on a focused needs basis at hotspot locations
10	Car clubs and EV bike hire schemes on development and public spaces in line with SBC EV Strategy, CEE plan.	Environment and Leisure (SBC)	Alternatives to private vehicle use	Public car and cycle hire	2022	2025	SBC	SBC (e.g., I&R); S106; new Active Travel Fund?	Part funded Two car clubs fully funded through S106 contributions and I & R funding.	£30k per town centre car club. £30k per town EV hire scheme. After 3 years the scheme should be self-funding. No direct cost to SBC if on development.	Ongoing	Lower NOx and PM10 emissions	Scheme utilisation and statistics from KCC through the Kent and Medway Energy and Low Emissions Strategy (ELES)	Faversham and Sittingbourne Car Clubs launched successfully. Car clubs encouraged in developments. Isle Sheppey options are being reviewed.	Varying views on back to base bike hire schemes. Drop off bike schemes have a much higher cost and risk level. Will need to consider the results from the Faversham Town Council scheme.
11	Work in partnership with Medway Council and KCC to agree mitigation and mechanism to manage transboundary impacts from development on air quality between Newington and Rainham.	Planning Policy and Environmental Health (SBC)	Policy Guidance and Development Control	Other policy	2023	2028	SBC, Medway District Council and KCC highways	S106 contributions and SBC staff costs	Part funded	Currently unknown	Planning	Lower NOx and PM10 emissions in Newington and Keycol Hill AQMAs	Implementation of actions	Initial discussions taking place with MBC and SBC. Independent air quality assessment is being completed as part of the decision-making process	Cross boundary barriers exist. An agreement between both districts needs to be made for collaborative measures and funding
12	Explore opportunities for EV charge points at AQMA's: Newington (Village Hall), Ospringe (SBC car park), East Street (Tesco car park or nearby schools) St Paul's Street (businesses nearby)	Environment and Leisure (SBC)	Promoting Low Emission Transport	EV recharging	2023	2028	SBC	OZEV (ORCS & LEVI); SBC; Private Investment; S106 contributions	LEVI funding being investigated with KCC - Funding to be confirmed	£50K - £200K	Planning	Lower NOx and PM10 emissions	No. charge points/ No. charge points per population	Ospringe site being reviewed as part of funding bid	Difference in strategy between SBC & KCC. DNO costs and grid capacity.

13	Public transport improvements to bus infrastructure/service	Public Transport and Highways (KCC)	Transport Planning and Infrastructure	Public transport improvement	2025	2028	SBC and KCC	No current funding sources. SBC revenue for staff costs	n/a	No specific cost required	Not started	Unquantifiable	Greater uptake of usage	<p>Recommendations made with planning responses and S106 contributions to improve bus services</p> <p>Climate team engaged with community rail partnership but project work yet to commence</p>	Support public transport providers in a lobbying role for improvements to infrastructure and service improvement
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Appendix A. Public Consultation (2023 -2028 AQAP update)

Background

Swale Borough Council's current air quality action plan ended in December 2022; this consultation is to support how improving air quality in the borough area will continue from 2023 to 2028.

Feedback was sought from residents and stakeholders on the proposed actions. The proposed plan focuses on improving air quality across the whole borough, as well as in the six air quality management areas (AQMA's). The draft consultation was approved by the Environment Committee on 3 November 2022.

Methodology

Swale Borough Council undertook a consultation between 3 November 2022 and 15 January 2023

The survey was carried out online with paper copies of the survey available on request. The survey was open to all Swale Borough residents aged 18 years and over as well as visitors to the borough. SBC provided the following stakeholder engagement:

- Letters distributed directly to households within and near the AQMA's.
- Social media and the Swale Borough Council's website
- Swale news Business e-Bulletin and mailing lists to businesses and statutory consultees
- Flyers put up in libraries and post offices

The Consultation asked respondents their opinions about the proposed actions for the Air Quality Action Plan. There was an opportunity throughout the survey to provide additional comments. There was a total of 148 responses to the survey. There were also two stakeholders that sent in detailed essays on their organisation's views of the proposals, these responses are shown in full at Appendix A & B. There were also some additional comments sent in by a resident, these had been included in the additional comments sections.

Please note not every respondent answered every question; therefore, the total number of respondents, refers to the number of respondents for that question, not to the survey overall. Comments have been categorised according to content with some covering more than one category. Demographic differences only relate to non-stakeholder responses.

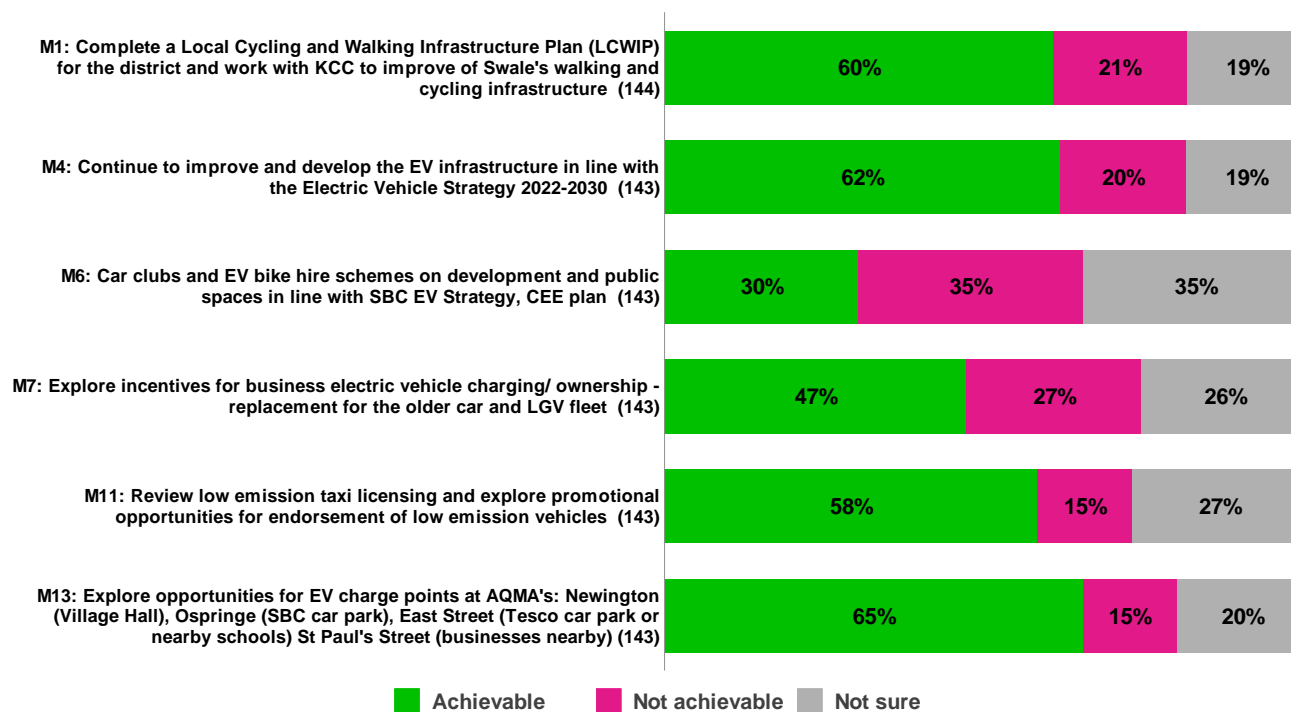
NB: The responses from this consultation have contributed to the decision-making process for Swale Borough Council's Air Quality priorities and measures outlined in section 5.

Section 1: Active Travel & Low Emission Vehicles

Achievability of measures

Respondents were asked to review the proposed measures relating to Active Travel and Low emission Vehicles and indicate if they felt each measure was achievable or not. A total of 144 answered this question set.

Measure 13: Explore opportunities for EV charge points at AQMA's: Newington (Village Hall), Ospringe (SBC car park), East Street (Tesco car park or nearby schools) St Paul's Street (businesses nearby) was considered the most achievable with 65% responding this way. Measure 6: Car clubs and EV bike hire schemes on development and public spaces in line with SBC EV Strategy, CEE plan was considered the least achievable with the greatest proportion answering 'not achievable' in response to the measures relating to Active Travel and Low Emission Vehicles.



Demographic Differences

The data show that younger respondents (44 years and under) were more likely to respond in favour of Measure 4: 'continue to improve and develop the EV infrastructure in line with the Electric Vehicle Strategy 2022-2030'. Respondents aged 75 years and over had the lowest proportion that said measure 4 was achievable at 40.0%.

The data also suggests a liner relationship between age and feeling around the achievability of measure 6. The proportion responding that measure 6 was achievable decreases as age increases.

There was a significantly greater proportion of female respondents that said measure 11 was achievable with 67.2% answering this way compared to 48.4% of male respondents.

Active Travel & Low Emission Vehicles Measures Comments

Respondents that said a measure was unachievable, were prompted to explain why they felt this way. Their comments are summarised and themed for each of the measures below.

M1: Complete a Local Cycling and Walking Infrastructure Plan (LCWIP) for the district and work with KCC to improve of Swale's walking and cycling infrastructure (30 Comments)		
Theme	No.	Nature
Safety	8	Cyclists feel unsafe, with the A2 cited as dangerous for cyclists. Recent bike fatality in Teynham.
Infrastructure	8	There is not enough space to have dedicated cycle lane. The road is too narrow.
Behaviour Change	7	People will not use active travel methods because: They are stuck in their ways. The car is convenient and practical. Distances between villages too long. Facilities such as schools and leisure activities are not local. Village populations tend to be older.
Development	5	Too many houses being built. Area is over-capacity. Further development means increased traffic.
Traffic Volume	5	Cycle lanes with increase congestion and pollution. Too many HGVs. Do more to improve traffic flow.
Cost	3	This measure will cost too much to implement. This measure would be a waste of money (cite removal at Newbury). Query if funds were available to implement this measure.

M4: Continue to improve and develop the EV infrastructure in line with the Electric Vehicle Strategy 2022-2030 (28 Comments)		
Theme	No.	Nature
EV Infrastructure	7	Development of full charging infrastructure is 20 years away. Where would charging points go – there is no room for them.
Cost of buying EV	7	Electric vehicles are too expensive for the average person. Cost of charging vehicle is going to increase.
Development	5	More development means more vehicles on the roads. Electric Network said to be at limit, and under more strain due to housing development.
Other	4	
Waste of money	3	Money should be spent elsewhere (invest in current infrastructure).
Cost of implementation	2	Query the availability of funds for implementation.
Parking	2	Lack of private parking and availability of charger makes EV unviable in rural and conservation areas.

M6: Car clubs and EV bike hire schemes on development and public spaces in line with SBC EV Strategy, CEE plan (48 Comments)		
Theme	No.	Nature
Little to no impact / Unlikely to be used	25	Current bike schemes are not used. Relies too much on commitment from the public for behaviour change. Older demographic and rural nature of area means uptake would be low.
Road safety	7	Roads are unsafe to cycle. Recent road traffic accidents cited.
Space for scheme	5	Lack of space to implement this measure – car parks/car share or space dedicated for cycle lane.
Cost	5	Where is the funding coming from to implement this measure. Concerns measure is not good value for money.
Working patterns	3	Car sharing unviable due to people having varied working patterns.
Traffic & Roads	3	There is too much traffic on the roads. Roads are too busy.
Other	3	Rural areas and villages are overlooked when it comes to these schemes. Query about how people access these schemes.

M7: Explore incentives for business electric vehicle charging/ ownership - replacement for the older car and LGV fleet (34 Comments)		
Theme	No.	Nature
Cost of scheme	17	Requires significant amount of funding to implement (expensive) – where will this funding come from. Concern cost of this measure will be passed onto local businesses – who are already struggling.
Cost of Electric Vehicles	9	Electric vehicles unaffordable for the average person. People can't not upgrade their cars during the current cost of living crisis.
Charging infrastructure	3	There are not enough charging points – also space to park while charging and time to charge not ideal.
Incentive to change	3	There is not enough of an incentive and there is lack of trust in government incentives (history with diesel vehicles).
Other	3	Measure needs more action than exploration. EV are unreliable and have limited range.

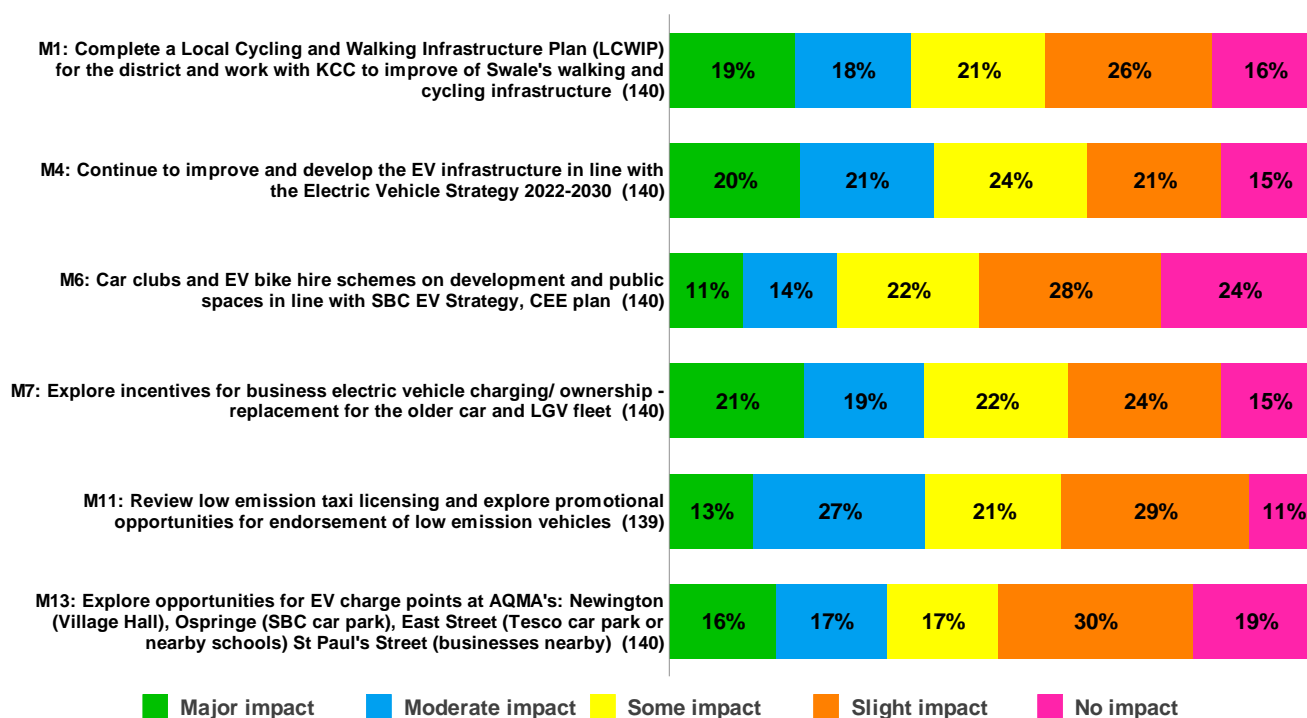
M11: Review low emission taxi licensing and explore promotional opportunities for endorsement of low emission vehicles (12 Comments)		
Theme	No.	Nature
Costs	9	This measure is not achievable due to high costs for drivers. EVs are too expensive.
EV Infrastructure	2	Limited charging network makes this unworkable.
Other	2	EVs will not solve congestion issues. Doubtful about take-up.

M13: Explore opportunities for EV charging points at AQMA's: Newington (Village Hall), Ospringe (SBC car park), East Street (Tesco car park or nearby schools) St Paul's Street (businesses nearby) (19 Comments)		
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Theme	No.	Nature
Teynham	5	Why are there no charging point for Teynham. Why is Teynham no longer within the AQMA.
Space for charging	4	Currently insufficient parking spaces. No room at current parking spots for EV chargers. No demand for EV charging points. Why are some areas of Swale no considered for EV charging points.
VFM	4	Waste of money as take up will be low. Funds would be spent elsewhere.
Cost of EV	2	EV are unaffordable – particularly considering current cost of living crisis.
No or little impact	2	One charging point will not resolve the issues. People do not care for EVs.

Impact

For each of the proposed measures, respondents were next asked to indicate what impact they thought each of the measures would have on air quality locally. Measure 4: Continue to improve and develop the EV infrastructure in line with the Electric Vehicle Strategy 2022-2030 was felt to have the potential for greatest impact with 41% responding major or moderate impact. Measure 6: Car clubs and EV bike hire schemes on development and public spaces in line with SBC EV Strategy, CEE plan was felt to have the least potential for impact with 52% responding slight impact or no impact.



Demographic Differences

There was a significantly greater proportion of female respondents that said measure 1 would have a major or moderate impact with 41.4% answering this way compared to 24.2% of male respondents. Across the age groups respondents aged 75 years and over has the lowest proportion responding that measure 1 would have a major or moderate impact with 13.3% answering this way.

There were no other significant differences in how different demographic groups responded to the questions about impact for the measures relating to active travel and low emission vehicles.

Active Travel & Low Emission Vehicles Additional Comments

All respondents were given the opportunity to provide additional comments about the proposed measures around Active Travel and Low Emission Vehicles. A total of 70 additional comments were received.

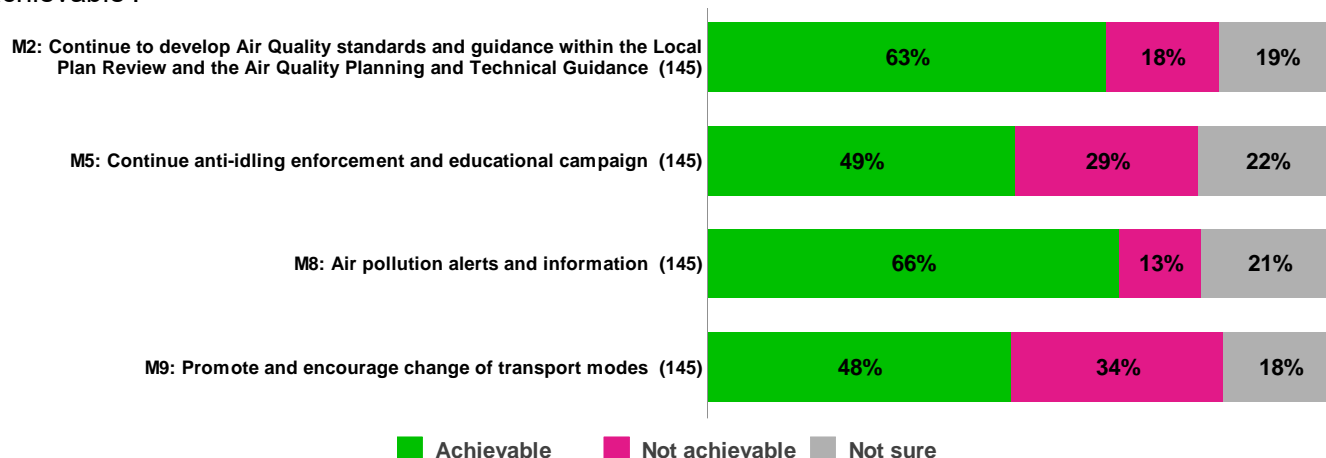
Theme	No.	Nature
Impact	16	These measures will make no difference to congestion or pollution. The impact of these measure is marginal.
EVS	18	There is a lack of infrastructure for EVs. EVs are expensive, EV measures will not have any impact until EV vehicles are cheaper. EV charging point should be standardised.
Active travel	17	Cycle routes need to be safe. Introduce bookable bikes and low-cost taxis. Local roads are not wide enough to accommodate cycle lanes. Those willing to walk or cycle already do so.
HGVs	9	Restricts HGVs. HGVs main cause of emissions. Chicanes will not work on A2 for HGVs.
Development	9	Too much housing development for road infrastructure. Stop building houses.
Traffic volume	8	Clear roads of parked cars to improve the traffic flow (Chalkwell Road). Only way to improve air quality is to reduce traffic volume.
Other	5	Need to set achievable targets. Query about research between pollution and health locally. Request for speed cameras in Teynham. Add junction to M2 by science park.
Teynham	3	Why are there no EV charger in the parish car park. Impacts of traffic in Teynham is being ignored. Clarification requested on future of AQMA relating to Teyham.

Section 2. Public Health, Engagement & Planning Control

Achievability of measures

Respondents were asked to review the proposed measures relating to 'Public Health, Engagement & Planning Controls' and indicate if they felt each measure was achievable or not.

There was a total of 145 responses to this question. Measure 8: Air pollution alerts and information was considered the most achievable measure with 66% of all respondents answering this way. Measure 9: Promote and encourage change of transport modes, was considered the least achievable of the measures relating to Public Health, Engagement and Planning Control with the greatest proportion answering, 'not achievable'.



Demographic Differences

A significantly greater proportion of male respondents said that Measure 5 was unachievable with 41.3% answering this way compared to 22.6% of female respondents.

The age group 45 to 54 years had a significantly lower proportion that said measure 9, promote and encourage change of transport modes was achievable with 20.0% answering this way.

Public Health, Engagement & Planning Control Measures Comments

Respondents that said a measure was unachievable, were prompted to explain why they felt this way. Their comments are summarised and themed for each of the measures below.

M2: Continue to develop Air Quality standards and guidance within the Local Plan Review and the Air Quality Planning and Technical Guidance (21 Comments)		
Theme	No.	Nature
Development	6	Too much development. More house building means more traffic and congestion.
Other	5	Removal of AQMA 5 would be a danger to people's health. Air quality will not improve until public transport improves. There are too many diesel cars on the roads. No action in Ospringe. Less regulation.
No impact	4	This doesn't address the major factors affecting air quality. Regulations are not enforced. Nothing will change.
Monitoring	3	Monitoring sites should be expanded (sites pollutant and be continuous). Not measuring PM2.5. Following wrong standards for monitoring air quality.
Cost	3	This is a waste of money. Concern about cost.

M5: Continue anti-idling enforcement and educational campaign (38 Comments)		
Theme	No.	Nature
Enforcement	23	This is not monitored or enforced. This is not practical or enforceable – would require significant resources. Unless there is enforcement this will be ignored.
Traffic flow	9	Traffic flow is too poor to prevent people from idling. How will this work when local roads at standstill.
Impact	3	Difficult to change attitudes and behaviour. Unlikely to get public buy-in.
Older vs newer vehicles	3	Older vehicles do not have provisions for cutting engine when stationary to prevent idling.
Development	2	More house building causes more traffic.
Other	2	KCC & SBC are not listening. This measure could be dangerous and Council has no right to interfere with how private individuals operate their vehicles.

M8: Air pollution alerts and information (16 Comments)		
Theme	No.	Nature
No impact	6	Alerts do not reduce pollution. Pollution has been high for years and nothing changes. People don't believe scientists/that there is an air pollution issue.
Development	4	Too much house building.

		Housing developments have been placed in areas of high air pollution.
Air Quality Updates/ Information	3	SBC does not advertise air quality information. I have never received any information from SBC about air quality levels.
Traffic levels & flow	2	There is too much traffic on the roads. Traffic levels will continue to increase.
Other	2	Funds for this could be better spent elsewhere. Expand monitoring sites to give more confidence to air quality alerts.

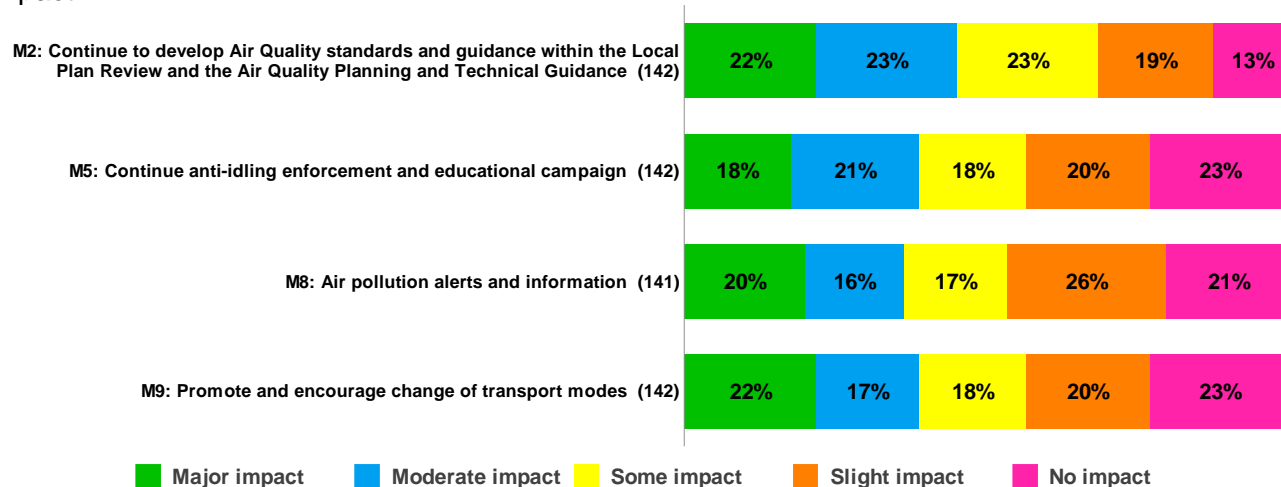
M9: Promote and encourage change of transport modes (47 Comments)		
Theme	No.	Nature
Public Transport	22	Bus services have been cut. Bus services are unreliable and inconvenient.
Little to impact	10	Cars are used out of necessity. Cars are the most convenient and practical transport mode for most.
Active travel	5	Alternative transport modes limited in rural areas. Roads unsuitable for cycling. Cycling unsuitable for older members of the community and children.
EVs	4	EV are unaffordable for most.
Cost	3	Concern over funding for this measure, in current economic climate.
Other	3	Do not want low emission zone like London. A2 through Ospringe requires more examination. Poor press on EVs making people reluctant to switch.
Development	2	No more house building.

Impact

For each of the proposed measures, respondents were next asked to indicate what impact they thought each of the measures would have on air quality locally.

Measure 2: Continue to development Air Quality Standards and guidance within the Local Plan Review and Air Quality Planning and Technical Guidance was felt to have the potential for greatest impact with 45% responding major or moderate impact.

Measure 8: Air quality pollution alerts and information was felt to have the least potential for impact with 47% responding slight impact or no impact.



Demographic Differences

There was a significantly greater proportion of female respondents that said measure 5 would have a major or moderate impact with 48% answering this way compared to 29% of male respondents.

There were no other significant differences in how different demographic groups responded to the questions about impact for the measures relating to Public Health, Engagement & Planning Control.

Public Health, Engagement & Planning Control Additional Comments

All respondents were given the opportunity to provide additional comments about the proposed measures around Public Health, Engagement & Planning Control. A total of 33 additional comments were received.

Theme	No.	Nature
Traffic Flow	8	The A2 is busy with slow moving traffic. Review traffic light settings to improve traffic flow. Review necessity for traffic lights at roundabouts to improve traffic flow. There are too many vehicles on the roads.
Public Transport	7	Funding for public transport is being cut. Public transport is not a cost-efficient way to commute.
HGVs	5	There are too many lorries on the roads. Remove HGVs from residential areas. Businesses using HGVs must be encouraged to make changes.
Idling	5	An education campaign on idling will have little impact. More publicity on idling required. Anti-idling campaign would be a cheap and positive measure to carry out.
Development	5	Too many new homes being built. New developments should have storage for bikes and less parking. Planning guidance for offsetting developments along borough boundaries
Active Travel	5	Safe cycling infrastructure needed. Invest in sensible walking and cycling routes.

Little or No impact	4	The impact of the proposed measures will be limited. Measures are not SMART.
Data & Monitoring	3	Consider adopting lower WHO standards for particulate pollution. Increase number of air quality monitoring sites (Murston Road). Monitoring sites should be expanded (sites pollutant and be continuous).
Other	3	Whole electric vehicle plan is not the answer. Plant more trees and vegetation.

Section 3: Transport, Transport Planning and Traffic Management

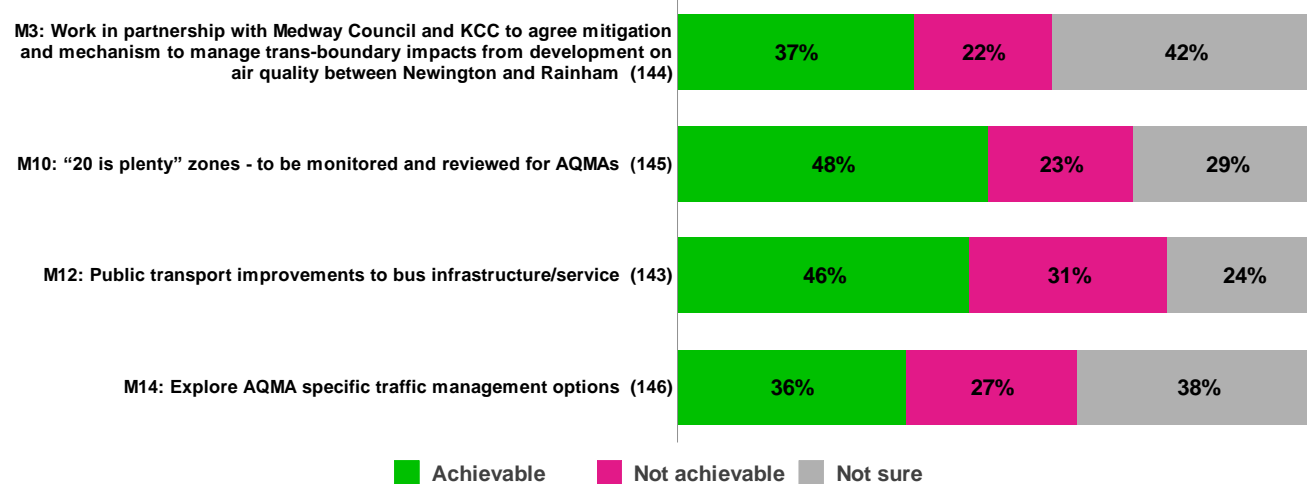
Achievability of measures

Respondents were asked to review the proposed measures relating to 'Active Travel and Low emission Vehicles' and indicate if they felt each measure was achievable or not.

146 respondents answered this question.

Measure 10: '20 is plenty' zone to be monitored and reviewed for AQMAs was considered to be the most achievable measure with 48% of responding this way.

Measure 12: Public transport improvement to bus infrastructure/service was considered the least achievable with the greatest proportion answering 'not achievable' in response to the measures relating to Transport, Transport Planning and Traffic Management.



Demographic Differences

There was a significantly greater proportion of male respondents that said Measure 10 was unachievable with 33% answering this way compared to 18% of female respondents.

The 45 to 54 years age group had a significantly lower proportion that said Measure 10, '20 is plenty' zone to be monitored and reviewed for AQMAs was unachievable with 12% answering this way, compared to respondents in the age groups 65 years and over where 40% said that this measure was unachievable.

The 35 to 45 years age group had a significantly lower proportion that said Measure 12, Public transport improvements to bus infrastructure/services was unachievable with 15% answering this way, compared to respondents in the 45 to 54 years age group where 49% said that this measure was unachievable.

Transport, Transport Planning and Traffic Management Measures Comments

Respondents that said that a measure was unachievable, were prompted to explain why they felt this way.

Their comments are summarised and themed for each of the measures below.

M3: Work in partnership with Medway Council and KCC to agree mitigation and mechanism to manage trans-boundary impacts from development on air quality between Newington and Rainham (25 Comments)		
Theme	No.	Nature
Partnership working	9	Each LA has their own agenda. History of poor partnership working.
Little or no impact	8	Nothing will change. This measure is pointless and not needed (area between Rainham and Newington is not the areas where the problem is). You cannot stop people commuting.
Development	6	Stop building housing. Development is not accompanied by updated transport infrastructure.
Traffic	2	Roads are gridlocked. The route of the issue is the road infrastructure.
Public transport	2	There is a lack of bus services.

M10: "20 is plenty" zones - to be monitored and reviewed for AQMAs (29 Comments)		
Theme	No.	Nature
Little to no impact	23	20mph is an inefficient speed to travel. This would cause more congestion and in turn more pollution. Research has shown this does not work. 20mph is an unrealistic speed to expect driver to do and will just annoy them
Enforcement	6	Current speeds limits not enforced. There are no resources to enforce this. This measure would be ignored as will not be enforced.
Monitoring	2	More monitoring sites needed. Data incomplete as monitoring sites change.
Other	2	Stop building housing.

M12: Public transport improvements to bus infrastructure/service (40 Comments)		
Theme	No.	Nature
Buses	29	Bus services have been cut. Bus companies cannot sustain current routes.

		If buses were a better option, then services wouldn't be cut.
Cost	7	There is no funding or public money for more bus services. This would cost too much to implement. Use of buses declining therefore this would be a poor use of funds.
Impact	3	No join up between LAs for infrastructure. SBC has little leverage in this area. Lack of faith in partnership working with KCC.
Development	1	Stop building housing.

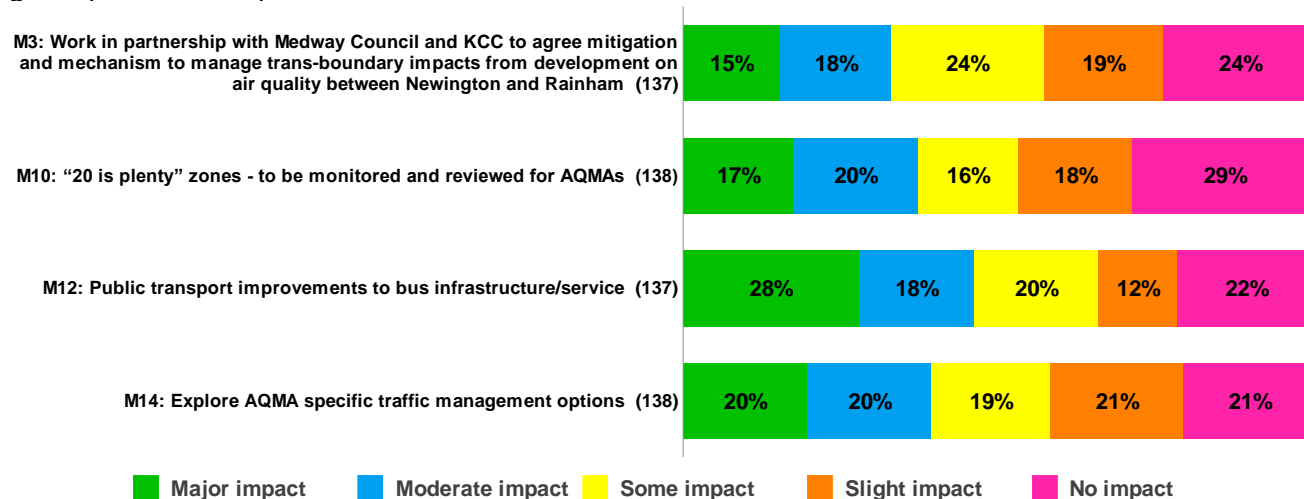
M14: Explore AQMA specific traffic management options (34 Comments)		
Theme	No.	Nature
Traffic flow	15	There is too much traffic – roads are gridlocked. Restrictions on volume of traffic rather than in specific locations. Do not want a LEZ. Traffic calming measure impractical.
Parking	9	People need to be able to park their car near where they live. Lack of parking is already an issue. Taking away car parking or adding additional car parking restrictions could damage local businesses.
Development	6	New housing development need sufficient parking facilities. New house building creates more traffic.
Impact	5	This will cause more problems than solve them. This will increase pollution. This will just slow traffic down further.
Other	5	Where will funding come from for this measure. Current pilots have not been evaluated; options should not make life more difficult. There is no funding for enforcement.

Impact

For each of the proposed measures, respondents were next asked to indicate what impact they thought each of the measures would have on air quality locally.

Measure 12: Public transport improvement to bus infrastructure/service was felt to have the potential for greatest impact with 46% responding major or moderate impact.

Measure 10: '20 is plenty' zones to be monitored and reviewed for AQMA was felt to have the least potential for impact with 47% responding slight impact or no impact.



Demographic Differences

There was a significantly greater proportion of male respondents that said Measure 3 would have a slight impact or no impact with 56% answering this way compared to 34% of female respondents.

There was a significantly greater proportion of female respondents that said Measure 10; '20 is plenty' zones to be monitored and reviewed would have a major or moderate impact with 46% answering this way compared to 24% of male respondents.

There was a significantly greater proportion of female respondents that said Measure 14; Explore AQMA specific traffic management options would have a major or moderate impact with 45% answering this way compared to 27% of male respondents.

There were no other significant differences in how different demographic groups responded to the questions about impact for the measures relating to Transport, Transport Planning and Traffic Management.

Transport, Transport Planning and Traffic Management Comments Additional Comments

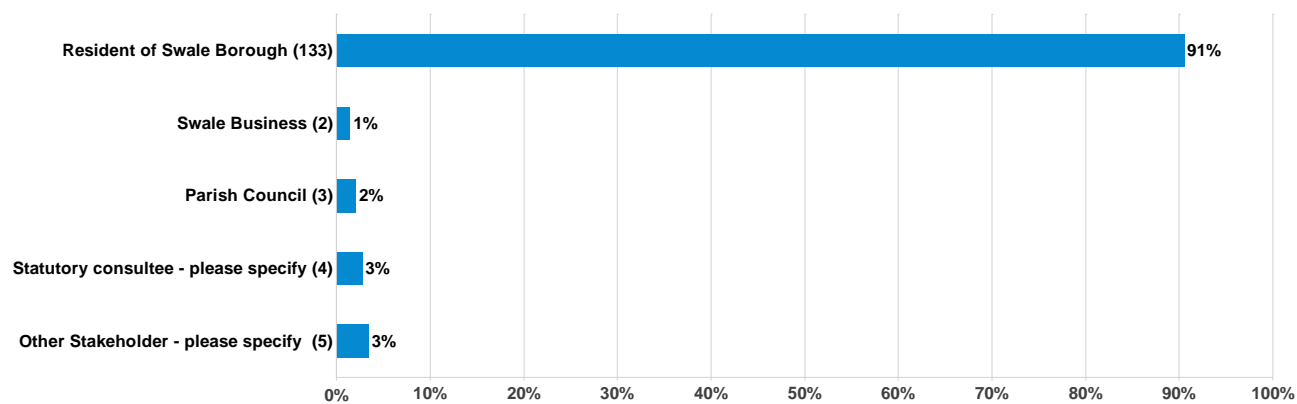
All respondents were given the opportunity to provide additional comments about the proposed measures around Transport, Transport Planning and Traffic Management Comments. A total of 30 additional comments were received.

Theme	No.	Nature
Traffic Flow	12	More needs to be done to keep the traffic moving. 20 is plenty hinders traffic flow. 20 is plenty should be adopted more widely by villages and towns.
Public transport	7	Introduce electric and hydrogen buses. Public transport has been cut and needs to improve.
HGVs	6	Restrict lorries on certain routes (A2, Ospringe & Keycol Hill). Restrict HGVs speed.
Impact	6	Measure will not change behaviour. Measures need enforcing or will be ignored. Each measure will have some impact but will not benefit drivers.
Other	4	Suggestion of a Winkle and Crab Walkway and Cycling Route. Already limited parking in Faversham. More monitoring zones required.

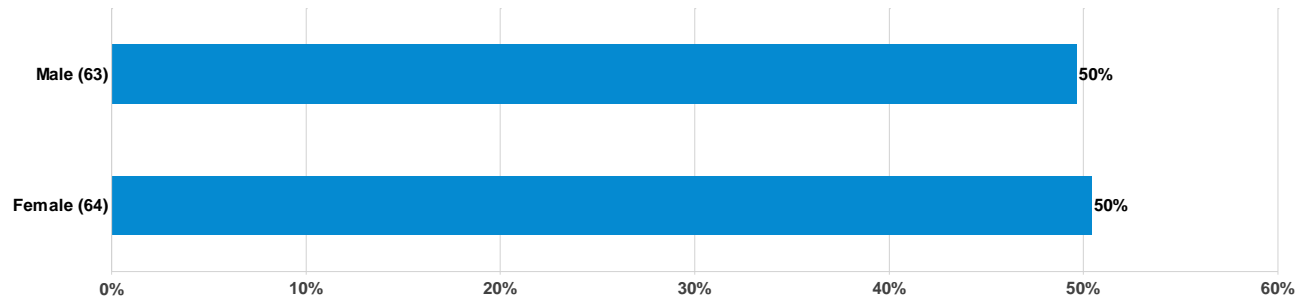
		More enforcement on bonfires.
Development	3	Stop building more houses. Local industry approves unhelpful – cement factory.

Demographics

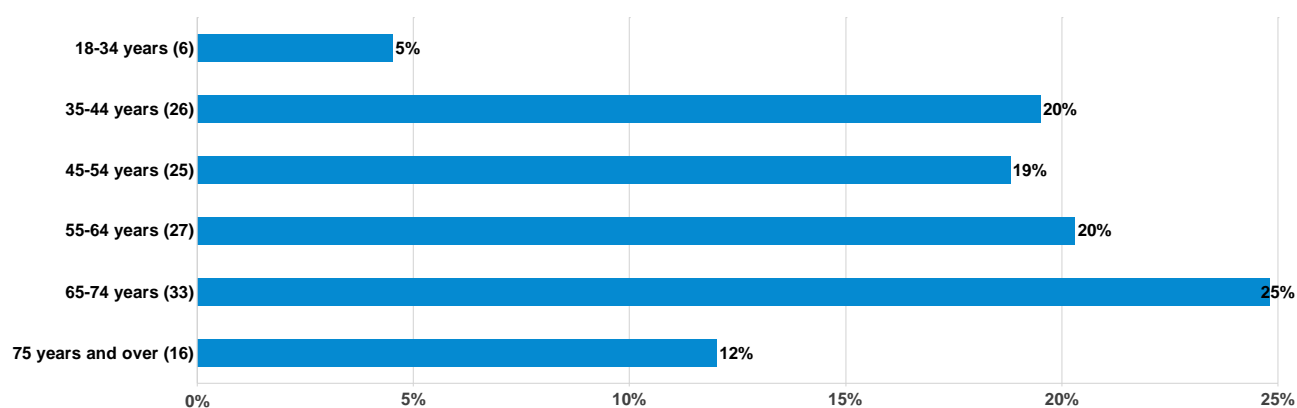
Respondent Type



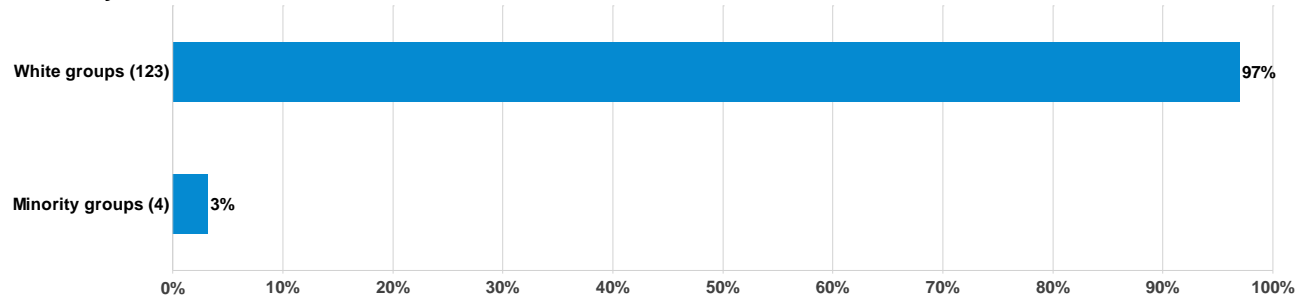
Gender



Age



Ethnicity



Kent County Council Public Health response:

Response to Swale Air Quality Action Plan

Poor air quality is the largest environmental risk to public health in the UK²³ and why as the Kent Public Health Team we are pleased to be able to provide a more comprehensive response to the Swale Borough Council Air Quality Action Plan Consultation.

The quality of the air that we breathe plays a major part in the overall health of our community. We must, therefore, ensure all residents can enjoy good air quality that will not pose a risk to health and wellbeing.

Air pollution is a problem that affects everyone; however, the impact of air pollution on health is not distributed equally within a population and often affects the most deprived communities and most vulnerable individuals. Groups disproportionately affected include;

Older people

Children

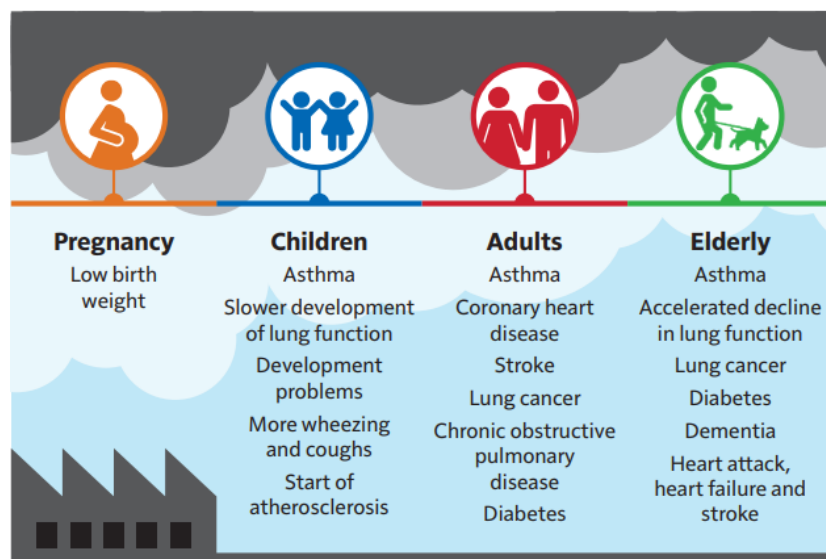
Pregnant women

Individuals with existing medical conditions (cardiovascular and/or respiratory disease)

Communities in areas of higher pollution

Low-income communities

Figure 1: Health effects of air pollution throughout life



Source: Adapted from Public Health England (2018)

Understanding the local population of Swale

It is important that the local health needs of the current and future Swale population form part of the evidence in determining actions to improve air quality and particularly those groups which are disproportionately affected.

The information below has been collated from [Public Health Fingertips](#) and focuses on the AQMAs as outlined in the consultation. Please note that the data does not consider ambient air pollution levels; it focuses on certain characteristics identified in Figure 1 of the resident population that could lead to more adverse health impacts due to poor air quality. The data below should be used to offer insight into certain groups which may be disproportionately affected and used as suggestion only to inform future action planning. This should be used to compliment other forms of evidence including ambient air pollution levels and local area knowledge.

Vulnerable groups	AQMA average compared to district average
Older people - % of population aged 65 and over, 2020	In Swale, generally, there has been an increase of 27.3% in people aged 65 years and over ²⁴ . When analysing the AQMA areas as per the consultation, 3 areas (AQMA 1, 2/6, 3) score significantly higher / have a greater number of older people aged 65 and over when compared to the district average of 19.3.
Children - % population aged under 16, 2020	In Swale, generally, there has been an increase of 9.4% in children aged under 15 years and an increase of 8.3% in people aged 15 to 64 years ²⁵ . When analysing the AQMA areas as per the consultation, 1 area (AQMA 4) scores significantly higher / have a greater number of children age under 16 when compared to the district average of 20.5.
General fertility rate (used as a proxy for pregnant women) – live births per 1,000 women aged 15-44 years, 2016-2020	The general fertility rate: live births per 1,000 women aged 15-44 years is higher in Swale (65.9 per 1,000) in comparison to the England average of 59.2 per 1,000 ²⁶ . When analysing the AQMA areas as per the consultation, 3 areas (AQMA 1, 3 and 5) score significantly higher / have a greater number of general fertility rate when compared to the district average of 65.9.
Existing cardiovascular disease- CHD emergency admissions ratio, 2016/17-2020/21; stroke emergency admissions ratio, 2016/17-2020/21; heart attack emergency	When analysing the AQMA areas as per the consultation, 1 area (AQMA 5) scores significantly higher / has a greater number of CHD emergency admission ratio when compared to the district average of 96.2. In addition, when analysing the AQMA areas as per the consultation, 2 areas (AQMA 2/6 and 4) score significantly higher / have a greater number of heart attack emergency admissions ratio when compared to the district average of 94.1. The AQMA areas 4 and 5 had a significantly

19. [Health matters: air pollution - GOV.UK \(www.gov.uk\)](#)

²⁴ ibid

²⁵ ibid

[Public health profiles - OHID \(phe.org.uk\)](#)

admissions ratio, 2016/17-2020/21	higher / greater number of stroke emergency admissions ration when compared to the district average of 83.3.
Existing respiratory disease - COPD emergency admissions ratio, 2016/17-2020/21; lung cancer incidence ratio, 2015-2019	The mortality rate from respiratory diseases for individuals under 75 in Swale has increased over the last 5 years (42.3 per 100,000; years 2017-19) and is significantly worse than the national average of 33.6 per 100,000 ²⁷ . When analysing the AQMA areas as per the consultation, 3 area (AQMA 1, 3 and 5) score significantly higher / have a greater number of COPD emergency admission ratio when compared to the district average of 106.0. In addition, when analysing the AQMA areas as per the consultation, 2 areas (AQMA 1 and 7) score significantly higher / have a greater number of lung cancer incidence ratio when compared to the district average of 107.8.
Swale deprivation decile, 2019 (Kent deprivation deciles)	When analysing the AQMA areas as per the consultation, 3 areas (AQMA 1, 4 and 5) score moderately higher / have a greater number of individuals living within the deprivation decile.

In conclusion, any evidence-based intervention that is aimed at reducing air pollution can contribute to increased life expectancy and also help reduce premature deaths from cardiovascular and respiratory disease. We would encourage a focus on improving air quality as a whole, including interventions that reduce emissions, whilst also embracing measures that can be adopted at an individual level such as promoting active travel and awareness of the effects of air pollution on health. We would encourage the Council to maximise the potential health benefits of actions and potential associated co-benefits, such as increased physical activity; climate change mitigation and adaptation; road safety and anti-idling policies.

Recommendation: Swale BC to further understand the demographics of their local population, using the data links provided, so that residents affected by poor air quality within the existing AQMAs may be adequately supported.

Recommendation: Swale BC to consider undertaking borough wide air quality modelling exercise, based upon any proposed development in the Local Plan; ensuring there is a better understanding of the effects on future development upon air quality and any mitigation required.

Recommendation: Consider ways of disseminating messages about air quality; especially in poor air quality locations in Swale BC.

Communications on air pollution alerts and information directed at vulnerable people (COPD and asthma) and information of health effects.

Recommendation: Focus on improving air quality as a whole, including evidence-based interventions that reduce emissions, whilst also embracing evidence-based interventions that can be adopted at an individual level, e.g., active travel, anti-idling policies, traffic restrictions around schools.

NB: The responses from this consultation have contributed to the decision-making process for Swale Borough Council's Air Quality priorities and measures outlined in section 5.

²⁷ ibid

Appendix B – Lynsted with Kingsdown Parish Council

SBC CONSULTATION on Air Quality Action Plan (2023-2028)

~ Response from Lynsted with Kingsdown Parish Council ~

CONTEXT/RATIONALE

SBC are obliged to take measures to reduce harmful pollutants below defined thresholds of harm identified by the European Union and, in due course, the thresholds identified by the World Health Organisation (WHO). The most pressing of harmful pollutants that need to be reduced is PM2.5, but this is not being measured at all by SBC. Instead, their primary focus is on NO₂, which has been reducing at a national level through changes in Government/EU policies on emissions – e.g., HGVs and diesel fuel.

Broadly, SBC's response to their legal obligations is to rely on measurement of NO₂ over which it has neither control nor accurate and timely measure within AQMAs. Worse still, within AQMAs where concentration of traffic and congestion has produced locally non-compliant levels of NO₂, SBC relies on the notoriously inaccurate annualisation of periodic (one month) deployment of diffusion tubes along the A2 in Teynham/Lynsted.

This lack of granularity in the evidence-base means SBC simply cannot claim to 'meet' government targets neither for the four most harmful pollutants (NO₂, PM2.5, PM10, and VOCs¹) nor the intensity of harmful pollution events over one hour, one day, or one year.

SBC has introduced PM10 measurement in St Paul's Street (Sittingbourne) and Ospringe. They continue to reject "real-time" measurement uniformly across all declared AQMAs for all the pollutants identified in Government policy. This denies residents, workers and visitors any ability to judge their exposure to all four harmful products and change their behaviour accordingly, including active travel, gardening and exercising.

Rather than investing in their own network of comprehensive real-time monitoring stations for all pollutants in each AQMA, SBC officials rely on an argument of 'correlation' with 'equivalent' measurements found in Maidstone. SBC compares a fully urban topography with the through-traffic and congestion of AQMA5 [Source: Informal clarification by SBC Planning Officials at a public Working Group meeting in Swale House in July 2018 attended by LKPC].

Defra's examples of best practice promote the use of "real time" monitoring.
<https://laqm.defra.gov.uk/air-quality/air-quality-assessment/detailed-modelling/>

¹ Volatile Organic Compounds – which are also implicated in production of PM2.5 scale pollutants.

- SBC should be invited to “take a lead” by integrating a harmonised ‘real time’ network of monitors covering all four traffic-related pollutants. This would:
 - give policymakers an honest view of the problem at different times of day and across the seasons.
 - give residents meaningful and timely information to inform their decisions on active travel, exercise, outdoor leisure pursuits, opening windows, enjoying gardens etc.

OBJECTIVES

SBC identified a series of ‘measures’ in their AQAP 2018-2022 that can and should be challenged on progress and/or validity/relevance. What is missing is an **evaluation**, which often happens with policies that “roll over” one year to the next.

For the 2023 ‘update’, residents and PCs are quizzed on their views on the *achievability* of a limited slate of ‘new’ ‘interventions’. If you say “no” to a question, you can elaborate in comment boxes on the following page.

SBC’s overall objectives were (are?) (October 2018 AQAP Document):

“Introduction

This Air Quality Action Plan (AQAP) is being produced as part of the Council’s statutory duties required by the Local Air Quality Management framework. It outlines the strategic and local actions we will take to improve air quality in Swale Borough Council between 2018 and 2022.

Our key priorities are to develop measures which deliver compliance of air quality objectives through a combination of strategic and local focused AQMA measures. We have identified measures which target reductions in emissions from vehicle fleets (HGV, LGV and cars), smooth traffic flows and reduce congestion and protect local communities.”

The Terms of Reference for the latest Consultation.

“The updated plan outlines how we’ll:

- *Set up more car clubs and new bike hire schemes*
- *Install more electric vehicle charge points*
- *Work with Kent County Council to improve bus services and public transport infrastructure*
- *Explore traffic solutions such as creating one-way streets or installing chicanes to reduce or slow traffic in our AQMAs.”*

With the best will in the world, these ‘new ideas’ are little more than ‘greenwashing’ and are completely *out of scale* with the problems facing local communities - at least those communities outside our main towns. None of these can claim to make material inroads into the habitual reliance on private cars for domestic use and HGV/LGV use for commerce.

Indent 1: “We’ll set up more car clubs and new bike hire schemes”. A resident’s 24-hour manual count of traffic (21st/22nd July 2022) showed traffic volumes significantly higher (15,691) than the DfT manual count in 2019 (14,001 vehicles). This count predates the chaos created by M2/J5 shenanigans. Video files (x2) available on request.

The 2022 data reveals that 76.5% of traffic towards Faversham and 78.5% of traffic towards Sittingbourne is made up of private cars. In both directions there were only 27 bicycles (50% of which used pavements rather than the metalled road). Having more bicycles on hire is irrelevant to the conditions and lifestyles of people in the real world.

The national discussion of "active travel" is focussed solely on urban environments where distances are within the boundaries of willingness to use bicycles and alternative public transport exists.

In this context, the impact of Indent 1 is trivial and irrelevant to rural communities. Their impact on urban environments is also open to doubt.

The manual count referred to above reflects facts on the ground at a local level. At this local scale where the relationship between traffic and people is intimate – there are no mitigations. No opportunities to remove pollutants only feet away. National statistics for the period of Covid-19 dips in overall traffic at the height of the pandemic. At this national level, the differences between current and pre-2019 are narrowing. See, <https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>

Indent 2: "We'll install more electric vehicle charge points". Yet SBC has stated it has no plans to include Teynham/Greenstreet. We note in the consultation document under Q3 that the option to "explore opportunities for EV charge points at AQMA5" specifically excludes AQMA5. Why? Probably because SBC's thinking is well on its way to revoking AQMA5 based on flawed data. Without a perceived threat, the 'educational' value to our communities is discounted. However, this failure to install EV points in Teynham (pub car parks or the public car park) further downgrades the attractiveness and utility of investment in the future sustainability/relevance of Teynham/Lynsted.

Newington AQMA is comparable in topography/character but is not facing the same threats. See *Supplementary Note on AQMA5 status in SBC documentation below.*

Indent 3: "We'll work with KCC to improve bus services and public transport infrastructure". Is this an attempt to inject some humour into an otherwise dry subject? Public transport for rural communities has been emphatically revoked by KCC! The Council has withdrawn subsidies to private operators to run services that are not commercially viable. The consequence is that there will not be a single bus service in Lynsted with Kingsdown Parish and only an hourly service we understand along the A2 between Sittingbourne and Faversham. How exactly is SBC intending to work with KCC "to improve bus services" and what other "public transport infrastructure" are you referring to? The loss of 'feeder' services feels like the unintended consequences experienced after the Beeching hatchet-job on our railways.

This idea is another step in the process of cutting rural communities adrift to fend for themselves. In these circumstances, SBC may feel it has 'free licence' to dump on Greenstreet as it holds little value to them.

- Perhaps a more fruitful avenue for cooperation with KCC might include reclassifying/downgrading the KCC A2 stretch to make it less 'visible' to HGVs using satellite navigation. HGVs are not the problem on NOx but they are part of the generation of PM2.5 friction particles.

Indent 4: "We'll explore traffic solutions such as creating one-way streets or installing chicanes to slow traffic in our AQMA5". Traffic-calming measures are largely impossible along the A2 which provides a key emergency vehicle route in normal conditions but essentially during M2 incidents (or roadworks).

Current plans to reduce the speed-limit between Bapchild and Teynham/Lynsted to 30mph are largely irrelevant as speed throttling is designed to reduce severity of injury and death in

urban environments. Predominantly, that 'problem' only exists INSIDE Bapchild, Teynham and Ospringe. Is this idea preparatory to the coalescence of Teynham and Bapchild?

AQMA5s are, almost by definition, the busiest and most congested environments. Further throttling 'by design' without reducing volume does very little to address the generation and impact of pollution. The evidence-base is ambiguous on how and whether speed restrictions are (a) observed and (b) effective in tackling pollution. This field of analysis is exclusively focussed on complex town and city conditions rather than a 'through route' between larger centres A and B.

Reducing traffic speed does not remove the count of vehicles and their generation and recirculation of friction particles as wind and traffic pass along the road surface. If friction particulates are to be reduced, there would need to be a change in driving behaviours (instead of braking/accelerating when vehicles are close to each other).

- Slower traffic reduces distances between vehicles with the consequence that there are fewer "pauses" creating opportunities for pedestrians to cross the A2.
- Shorter distances also lead to greater 'soot'/PM2.5 intake by following vehicles.
- TfL evidence base assessment. <https://content.tfl.gov.uk/speed-emissions-and-health.pdf>. Slower traffic does not correlate with, or lead to, reduced pollution - as traffic contends with the many dimensions of physical restriction and competition/conflict in driver (and pedestrian) decision-making.

If SBC succeed in revoking AQMA5, they can remove any need to address the impact on pollution and its harms from high volumes of transit traffic through a narrowed and built-up area where vehicles are suddenly exposed to complexity/vulnerabilities created by pedestrians, cyclists, rural lane ingress, parking, deliveries, agricultural traffic and large numbers of wide Commercial (HGV/LGV) traffic (20-22% of total traffic along the A2 at Teynham).

THE “MISSING INDENT” – Developments and pollution (NPPF)

Under NPPF, SBC is obliged to make decisions on planning that REDUCE impacts on AQMAs. They are obliged to consider “cumulative impacts” of their decisions.

Unable to address this linkage in AQMA5 it appears to be SBC's preferred option to revoke AQMA5. Removing this status opens up opportunities to dump housing in this area without consequences.

We strongly oppose the suggested revocation of AQMA5.

We recommend the following initiatives:

- An air quality strategy designed to reduce **volume** in order to have any impact. There should be a MORATORIUM (a new and direct Policy) on ALL planning proposals between the Eastern side of Sittingbourne and Ospringe.
- Introduce real-time, continuous measurement across all declared AQMAs for the four pollutants identified in Government policy - NO₂, PM_{2.5}, PM₁₀, and VOCs.
- Enforcement of bicycle use of pavements as they now have stronger (paper) protection amongst other road-users.

In short,

- This consultation exercise is TRIVIAL in terms of its impacts and relevance in the real world;
- the likelihood of an attempt to revoke AQMA5 is the greater threat to our health and well-being because the decision is entirely dependent on NO₂ measurement. It also threatens arguments against future development proposals.

NB: The responses from this consultation have contributed to the decision-making process for Swale Borough Council's Air Quality priorities and measures outlined in section 5.

Appendix B. Reasons for not pursuing some Action Plan Measures (2023 – 2028)

Table B.1. Reasons for not pursuing some Action Plan Measures

2018 – 2022 measures		Comments
Strategic measures	HGV “Clear Air Corridor”	Clean Air Zone (CAZ) Feasibility study – Options for this was given thorough consideration. The non – charging CAZ option without enforcement, was not supported by the highway’s authority. A package of priority measures is supported and incorporated in this AQAP update and Swale’s Transport Strategy. These measures aim to improve active travel, reduce car use, improve traffic flow and improve the vehicle fleet along the A2.
	Air Quality and Low Emission Strategy	This measure has been removed, as we do not currently have an Air Quality and Low Emission strategy. Other action plans and strategies that this will come under include: AQAP 2023 – 2028; Climate and Ecological Emergency Action Plan (22 April 2020); SBCs EV Strategy. This measure could be revisited through the life of the AQAP.
	Development of Air Quality standards within new Local Plan	We have pulled together measures (Updated name Continue to develop Air Quality standards and guidance within the Local Plan Review and the Air Quality Planning and Technical Guidance), as both come under ‘Policy Guidance and Development Control’
	“Clear Air Corridor” signage and information scheme”	Please see comments above
	KCC development control policies	Removed – please see above
	Swale Freight Management Plan (2016)	This measure has been removed. This will link with and be reported on through SBCs Transport Strategy.
	Eco Stars	This measure has been discontinued due to Eco-stars not having the Emissions Toolkit to measure the direct improvement on air quality from members implementing improvement measures. This could be revisited through the life of the AQAP if toolkits are improved.
Localised measures	Local school and business travel plans	This measure will be removed and will come under the air pollution alerts, information and to raise awareness on impacts and solutions
	Pinch-point parking alternatives (red-route)	Further research is required and is to be delivered as part of the Local Plan via any new developments. This will also be reviewed as part of the Explore AQMA specific traffic management options measure.
	“20 is plenty” zones	Edited – “20’s plenty” zones – to be monitored and reviewed for AQMAs
	Quiet delivery zones	Measure removed because it has not been completed. To be reviewed as part of the Councils LCWIP.
	Local LEV car-club	Renamed: Car clubs and EV bike hire schemes on development and public spaces in line with Swales EV Strategy and CEE Action Plan.
Other measures not pursued	Explore opportunities to set up a Bus Gate – limiting LGV or HGV using St Paul’s Street and cars on East Street	This measure will be included in the: Explore AQMA specific traffic management options measure
	Cut back and regular maintenance of trees on KCC owned land that are creating canyon effects and reducing air quality	This measure was reviewed by SBC and KCC officers. Agreed no enforcement powers to control overgrown treetops along Keycol Hill as trees are privately owned and were not causing Health and Safety issues along the highway.
	Distribution Hub	The distribution hub will be reviewed as part the councils LCWIP
	Explore incentives for business electric vehicle charging/ ownership - replacement for the older car and LGV fleet.	Recorded as a high to very high cost for the Council. Feasibility of this measure is very low. Limitations in funding and staff resource for this action during this AQAP period. This could be revisited through the life of the AQAP.
	Promote and encourage active travel and change of transport modes	This was considered less achievable as a measure on its own in the public consultation. This will come under air pollution alerts, information and to raise awareness on impacts and solutions measure.
	Review low emission taxi licencing and explore promotional opportunities for endorsement of low emission vehicles	Feasibility of this measure is low with low air quality improvements.

Appendix C. Monitoring measures

Table C1. Monitoring measures

Measure		Monitoring options	Other performance indicators
1	Continue to develop Air Quality standards and guidance within the Local Plan Review and the Air Quality Planning and Technical Guidance	Implementation of policy and planning responses	Number of effective mitigation measures provided through development
		Fixed traffic counts to compare with SBCs 2017 Local Plan Transport model data – may commission additional recordings to compare years	Data collected from travel plans
		NO ₂ and Particulate monitoring	
2	Complete a Local Cycling and Walking Infrastructure Plan (LCWIP) for the district and work with KCC to improve of Swale's walking and cycling infrastructure	To consider commissioning the installation of walking and cycling counters in fixed or mobile positions. Best counter locations are where width is constricted, and adjacent vehicular traffic is limited. Costs for equipment and operating/maintenance costs for five years should be considered within costs for all large-scale walking and cycling improvements to measure the pre and post intervention levels of active travel journeys. The collation of walking and cycling figures can also measure the success of development plans e.g., LCWIPS, and behaviour change programs.	Completion of improved walking and cycle routes
		Data collection for LCWIP: use existing traffic data; analyse traffic flows, origin, and destination traffic data to evaluate level of intervention needed; DfT traffic data; Swale Local Plan traffic data model; Censors. Ensure that when traffic data collated for other purposes and includes walking and cycling counts, this information is centralised.	More people walking and cycling
		Work with volunteer groups to record active travel journeys to measure the success of specific active travel improvements.	
3	Air pollution alerts, information and to raise awareness on impacts and solutions	Kentair subscriber uptake	
4	To apply for Defra Air Quality Grant scheme to facilitate funding for the most suitable AQAP measures	Monitor the number of bids and each successful project. Monitoring will be shown in each project schedule.	
5	To reduce emissions from activities with Environmental Permits	Emissions data collected through Environmental Permit inspections	
6	“20 is plenty” zones - to be monitored and reviewed for AQMAs	Newington will be assessed through continuous air quality monitoring to see if any long-term air quality changes occur within the AQMA.	
		Work with volunteer groups and the Parish Council to identify if active travel has improved in Newington	
7	Continue to improve and develop the EV infrastructure in line with the Electric Vehicle Strategy 2022-2030	No. of charge points/ No. charge points per population. Usage of charge points.	
8	Explore AQMA specific traffic management options	Fixed traffic counts to compare with SBCs 2017 Local Plan Transport model data – could commission additional recordings to compare changes in traffic flow overtime. Developers may have done some addition monitoring that could be used.	Number of measures and positive performance monitoring data
		SBC and KCC officers are working together to explore AQMA specific traffic management options. Impacts will be investigated as part of the decision-making process. For example, St Paul's Street traffic relief options for a one-way streets system; parking restrictions; additional parking; minor walking & wheeling improvements and other traffic calming options, to make the routes less appealing to larger vehicles	
9	Continue anti-idling enforcement and educational campaign	Monitor NO ₂ at hotspot areas	
		Record number of cars idling and approached by Environmental Enforcement Wardens. Compare data overtime. Liaise with schools to see if they have noticed a difference in the number of cars idling since the campaign	
10	Car clubs and EV bike hire schemes on development and public spaces in line with SBC EV Strategy, Climate Ecological Emergency plan (CEE).	Scheme utilisation and statistics from KCC through the Kent and Medway Energy and Low Emissions Strategy (ELES), as well as feedback through the CEE	

11	Work in partnership with Medway Council and Kent County Council to agree mitigation and mechanism to manage transboundary impacts from development on air quality between Newington and Rainham.	NO ₂ , PM ₁₀ and PM _{2.5} monitoring. Other monitoring can be considered when mitigation is agreed.	
12	Explore opportunities for EV charge points at AQMA's: Newington (Village Hall), Ospringe (SBC car park), East Street (Tesco car park or nearby schools) St Paul's Street (businesses nearby)	EV registrations in Swale	
13	Public transport improvements to bus infrastructure/service	Quarterly reporting of data from bus operators of passenger uptake and progress reporting from KCC on funding or resource support opportunities for bus operators. Record lobbying actions by members.	Greater uptake of usage

Appendix D. Explanation on evaluating the cost effectiveness and rag rating of measures

A cost-effective assessment was first applied to all measures and rag ratings were added relative to their progress status. The cost-effective assessment total values were given relative to the feasibility, and air quality and non-air quality benefit value shown below. This information was then discussed and assessed against the cost using the cost effectiveness criteria shown in table D1. Table D2 provides an example of this and table D3 provide the complete list of all scored measures that are being taken forward in this AQAP. The table below provides a suggested means of describing the cost effectiveness for options using a cost band (high-medium-low) ascribed to each proposed measure against four cost descriptors. The 'High' is greater than £200K, 'Medium' is between £50K and £200K, and 'Low' is less than £50K. All variables were then used to prioritise the measures relative to their total numerical score relative to their cost effectiveness. The objective of the exercise was to prioritise a number of proposed options and measures that have been identified through the steering group.

Table D1. Example of cost effectiveness criteria used

		Cost			
		Very High	High	Medium	Low
Air quality impact	High	Medium	Medium	High	Very high
	Medium	Low	Low	Medium	High
	Low	Very low	Very low	Low	Medium

Example:

Measure: Complete a Local Cycling and Walking Infrastructure Plan (LCWIP) for the district and work with KCC to improve of Swale's walking and cycling infrastructure.

This measure is prioritised as 'medium' cost effectiveness scoring measure because it provides high non-air quality impacts and medium air quality benefits, with a medium cost estimate (£50K and £200K). For air quality improvements it was given medium impact (score: 3) as the air quality benefits are variable. This is because district and county council can improve the walking and cycling infrastructure, however, to ensure an air quality improvement is made it requires a dual factor dependent on a public behaviour change and pressures of convenience.

Practicality was considered and with this measure already underway, it was given a high feasibility score (score: 4).

Table D2. Example to explain process for prioritising measures

Proposed Measure	Cost Effectiveness	Cost	Reduces PM2.5 emissions	Effect on reducing NOx and PM10 emissions (low, medium, high)	Non AQ Impacts	Feasibility	Total	Timescale
	See Matrix below	High, Medium, or low		1 = Low	1 = Low	1 = Low		Short = <1yr
				5 = High	5 = High	5 = High		Med = <5yr
Complete an LCWIP for the district and work with KCC to improve of Swale's walking and cycling infrastructure	Medium	Medium	✓	3	4	4	11	Long = > 5yr

The rag rating colour code of red, yellow, and green have been applied to all measure's relative delivery or funding status.

Action on hold, significantly behind schedule with a risk of non-delivery or not started, or does not have funding	Action changed and/or timeline revised, but on track for delivery. Further or additional funding is needed which may cause some delay in delivery	Action on track or completed
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Table D3. Cost effectiveness assessment used to prioritise measures

 Defra Technical Guidance TG22 has provided guidance on the impacts of measures [Table A.1 – Action Toolbox](#)

Measure number	Proposed Measure	Cost Effectiveness	Cost	Reduces PM2.5 emissions	Effect on reducing NOx and PM10 emissions (low, medium, high)	Non AQ Impacts	Feasibility	Total	Timescale
		See Matrix below	High, Medium, or low		1 = Low	1 = Low	1 = Low		Short = <1yr
					5 = High	5 = High	5 = High		Med = <5yr
									Long = > 5yr
1	Continue to develop Air Quality standards within new Local Plan and KCC development control policies	High	Low	✓	3	3	5	11	Med = <5yr
2	Complete an LCWIP for the district and work with KCC to improve of Swale's walking and cycling infrastructure	Medium	Medium	✓	3	4	4	11	Long = > 5yr
3	Air pollution alerts, information and to raise awareness on impacts and solutions	Medium	Low	✓	2	3	5	10	Short = <1yr
4	To apply for Defra Air Quality Grant scheme to facilitate future funding for AQAP measures	Medium	Low	✓	2	4	5	11	Med = <5yr
5	To reduce emissions from activities with Environmental Permits	High	Low	✓	3	2	4	9	Short = <1yr
6	"20's plenty" zones - to be monitored and reviewed for AQMAs	Medium	Low	✓	1	4	4	9	Med = <5yr
7	Continue to improve and develop the EV infrastructure within the district	Low	High	✓	3	2	4	9	Med = <5yr
8	Explore AQMA specific traffic management options	Medium	Medium	✓	3	3	3	9	Med = <5yr
9	Continue anti-idling enforcement, signage and educational campaign	Medium	Low	✓	1	2	5	8	Short = <1yr
10	Car clubs and EV bike hire schemes on development and public spaces in line with SBC EV Strategy, CEE plan.	Low	Medium	✓	1	3	4	8	Med = <5yr
11	Work in partnership with Medway Council and KCC to agree mitigation and mechanism to manage transboundary impacts from development on air quality between Newington and Rainham.	Low	Medium	✓	2	3	3	8	Long = > 5yr
12	Explore opportunities for EV charge points at AQMA's: Newington (Village Hall), Ospringe (SBC car park), East Street (Tesco car park or nearby schools) St Paul's Street (businesses nearby); Teynham (Parish car park)	Low	Medium	✓	2	2	3	7	Med = <5yr
13	Public transport improvements to bus infrastructure/service	Low	Very high	✓	3	2	2	7	Long = > 5yr

Appendix E. Additional supporting reports

Swale Strategic AQAP 2018 - 2022 reports:

Report 1: Source Apportionment and Options Assessment ²⁸

Report 2: Swale Borough Council AQAP Consultation Committee Report (November 2022)²⁹

Report 3: Source Apportionment Study at St Paul's Street AQMA 4 (2021). Available on request

Report 4: Clean Air Zone Feasibility study (2020)³⁰

²⁸ Report 1: Source Apportionment and Options Assessment <https://services.swale.gov.uk/meetings/documents/s9627/Appendix%20II.pdf>

²⁹ Swale Borough Council AQAP Consultation Committee Report (November 2022)
https://services.swale.gov.uk/meetings/documents/s24524/SBC%20Report_Committee%20System%20-%20AQAP_final_20_10_22%20-%20Final%20Final.pdf

³⁰ Clean Air Zone Feasibility study (2020) <https://services.swale.gov.uk/meetings/documents/s16026/CAZ%20Appendix%20I.pdf>

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan – A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CAZ	Clean Air Zone
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
EU	European Union
JAQU	Joint Air Quality Unit (Defra and DfT)
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
HCPs	Health Care Practitioners

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9. Chief Medical Officer's Annual Report 2022: <https://assets.publishing.service.gov.uk/mwg-internal/de5fs23hu73ds/progress?id=i8m5J5egGiRk9LeevlwAnFTInUFKlpi6fR82MnB2s8.&>
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11. Clean Air Strategy 2019: <https://www.gov.uk/government/publications/clean-air-strategy-2019>
12. <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-Policy-Guidance-2022.pdf>
13. PHE. Health matters: Air pollution. London: Public Health England; 2018: Available from: <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-airpollution>.
14. Regulation 28 Report to prevent future deaths: <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>
15. National Planning and Policy Framework: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
16. Swale's Local Plan: <https://swale.gov.uk/planning-and-regeneration/local-plans/adopted-local-plan-for-swale>
17. Technical Guidance (TG22): <https://laqm.defra.gov.uk/wpcontent/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>
18. Policy Guidance (PG22): <https://laqm.defra.gov.uk/wpcontent/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>
19. Report 1: Source Apportionment and Options Assessment
<https://services.swale.gov.uk/meetings/documents/s9627/Appendix%20II.pdf>
20. Report 4: Clean Air Zone Feasibility study (2020)
<https://services.swale.gov.uk/meetings/documents/s16026/CAZ%20Appendix%20I.pdf>
21. LAQM Measures Toolkit: <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>
22. Pollution Patrol: <https://pollutionpatrol.org.uk/>
23. Report 1: Source Apportionment and Options Assessment
<https://services.swale.gov.uk/meetings/documents/s9627/Appendix%20II.pdf>

24. Swale Borough Council AQAP Consultation Committee Report (November 2022)
https://services.swale.gov.uk/meetings/documents/s24524/SBC%20Report_Committee%20System%20-%20AQAP_final_20_10_22%20-%20Final%20Final.pdf
25. Clean Air Zone Feasibility study (2020)
<https://services.swale.gov.uk/meetings/documents/s16026/CAZ%20Appendix%20I.pdf>

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Appendix 2: The AQAP themes for delivering compliance within the AQMAs are below:

Theme 1 - Public Health and Wellbeing (Health Promotion, Public information, Behaviour change/modal shift,).

Improving air quality is largely driven by a change in attitude and travel behaviours. As a Council, we have strong role in encouraging and facilitating this change. We aim to continue to inform health impacts associated with poor air quality and provide information and guidance to our residents as to how they can protect themselves and be part of the solution.

Theme 2 - Active Travel, Public Transport and Low Emission Vehicles.

Encouraging the uptake of alternatives to the car through improving cycling and walking opportunities, supporting sustainable public transport, car clubs, travel plans, electric vehicles, improving the electric vehicle charging infrastructure and other initiatives.

Theme 3 – Transport, Transport Planning and Traffic Management (Traffic management, Licensing, Parking, and Public Transport).

The Council will work with its wider strategic partners, such as Kent County Council, on matters of traffic management and public transport on issues that extend beyond the SBC's direct control. The aim is to mitigate existing traffic and transport concerns and seek opportunities for alternatives and improvements.

Theme 4 - Local Planning Policy and Development Management.

Various policy documents are already in place within the Council. It is important to utilise these to introduce mutually beneficial measures as mechanisms to reduce pollution emissions from road transport. This includes continuous development of air quality standards and guidance within the Local Plan Review and the Air Quality Planning and Technical Guidance.

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Environment Committee Meeting	
Meeting Date	29 June 2023
Report Title	Use of Remaining Improvement & Resilience funds allocated to the Climate and Ecological Emergency
EMT Lead	Emma Wiggins, Director Regeneration & Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Janet Hill, Climate Change Officer
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To reallocate remaining Improvement & Resilience funds for climate projects as detailed in the report below to; <ul style="list-style-type: none"> • Swale Cycle re-Cycle Project • Dedicated EV charge point for Sittingbourne Car Club • Carbon Footprint and Progress Review 2. Delegate any further adjustments in spending of climate funding to the Head of Environment and Leisure and Director of Resources in consultation with the Chair.

1 Purpose of Report and Executive Summary

- 1.1 At the end of 2022/23 not all of the Improvement & Resilience Fund allocated to the Climate and Ecological Emergency had been spent as first bid for.
- 1.2 This report recommends the reallocation of funds to three projects, all of which contribute to fulfilling our Climate and Ecological Emergency Declaration and it's Action Plan;
 - Swale Cycle re-Cycle Project - £5,000
 - Dedicated EV charge point for Sittingbourne Car Club - £7,000 (estimate)
 - Carbon Footprint and Progress Review - £25,000 (estimate)

2 Background

- 2.1 In June 2019 Swale Borough Council declared a Climate and Ecological Emergency. An Action Plan was adopted to deliver actions to address the emergency. Over the years both the Special Projects Fund (SPF) and the Improvement & Resilience (I+R) fund have been used for this purpose.

2.2 For various reasons not all the bids to the I & R fund have been fully spent. This is due to a combination of projects coming in under estimate following tender, not happening or where funds from other sources have been able to be used.

2.3 The funds remaining/unallocated are;

Project	Allocated (£)	Actual/ Committed Spend (£)	Total Remaining (£)	Comment
EV charging points	£50,000	£53,219	£3,219	Power supply charges increase following excavation, so funding needs to cover overspend
Planting- trees, grasses, etc	£25,000	£25,000	£0	n/a
LED lighting	£70,000	£70,000	£0	n/a
Car club	£52,000	£36,611	(£15,389)	Better tender pricing achieved
Air quality (Sensor, Newington Assessment, Anti-Idling Signs & Car Club 2)	£48,000	£28,083	(£19,917)	Use of funds from other sources to deliver car club 2 and air quality reports
Business conference	£5,000	£0	(£5,000)	Engagement with businesses done through other sources
Total	£250,000	£212,913	(£37,087)	

2.4 Three new projects would benefit from a reallocation of funds as detailed in the proposals section below.

3 Proposals

3.1 It is proposed to use the unspent funds in the following way.

a) *Swale Cycle re-Cycle*

This project is already underway led by our Active Travel Co-ordinator.

It is proposed to use the £5k that was allocated for a business conference which due to lack of staff resourcing did not happen.

This meets several of the Climate and Ecological Emergency Action Plan targets including improving incentives for cycling and increasing recycling. In addition,

prisoners will learn new skills enhancing employability post release and bicycles will be available to more vulnerable residents who could not otherwise afford one.

The proposed spend is

- £3,500 for workshop parts and materials.
- £200 for delivery of a used container to be sited in a suitable location in Faversham
- £450 for removal of container from Swale House and delivery to Sittingbourne HWRC
- £850 for HWRC Bike Collection Point Displays and end user Bikeability Training

b) Dedicated EV charging point for Sittingbourne Car Club

The Sittingbourne Car Club was launched in March 2023 building on the success of the Faversham Car Club. The same model is being used. Initially starting with three hybrid vehicles and then switching one to an electric vehicle once a car becomes available and a dedicated charge point is in place.

We need to install a dedicated charge point in the Albany Road Car Park. It is expected to cost approximately £7k and will include an element of future proofing for any additional charging points in the future.

This helps to meet the target of installing more EV chargers across the Borough and gives residents the opportunity to try an EV before committing to purchase one. It also helps with reducing car numbers and air quality.

Since there was an overspend on the EV allocation it is proposed to use the underspend on the car clubs to finance this.

c) Carbon Footprint and Progress

In 2020 the Carbon Trust produced a report on our carbon footprint and proposed ways of reducing it to meet our 2025 target of net zero. Due to a number of reasons, we have been unable to undertake all the reduction measures required. We now need to recalculate our footprint to quantify the benefits we have achieved from each of the successful projects over the last 4 years and to enable us to ensure any use of funding delivers the highest possible impact in terms of carbon reduction. We also need to explore offsetting and adaptation further. We require a consultant to carry out the work with a cost in the region of £25k. The Action Plan is due for a review, which will be undertaken by the Climate and Ecological Steering group and reported back to the Environment committee. This report, if undertaken, would give us a better understanding of where we are, the options open to us and how we take the Action Plan forward.

3.2 The table below summarises the costs and remaining balance.

Project name	Estimated Costs
Swale re-Cycle project	£5,000
Car club 2 EV charging point	£7,000
Carbon footprint re-assessment	£25,000
TOTAL	£37,000
Available funding for reallocation	£37,087
Balance	£87

3.3 A further option for discussion is to use some of the funds for particulate monitoring equipment to support analysis at sensitive areas in the borough. The purchase of said equipment is estimated at £16,000 but further analysis of the need and justification needs to be undertaken by officers.

4 Alternative Options Considered and rejected

4.1 Do not fund the Swale Cycle re-Cycle – this project is already underway and is proving very popular. Without this relatively small injection of funds the project could fail.

4.2 Do not fund the dedicated EV charging point for Sittingbourne Car Club – an alternative would be not to install a dedicated charge point. This would mean the Car Club would work on a different model to that agreed by the Environment Committee in June 2022 and remove the ‘try an Electric Vehicle before buying’ option for residents as only hybrid vehicles will be possible.

4.3 Do not fund the Carbon Footprint and Progress Review – we need to undertake this piece of work to establish our position in relation to our 2025 target of net zero and inform our way forward. We do not have the resource to do this within our current officer capacity.

4.4 The total unspent funding could be returned to the Budget Contingency reserve in order to support ongoing budget deficit.

5 Consultation Undertaken or Proposed

5.1 Internally informal consultations were held with members of the previous administration who were in favour of these proposals but given the timing thought it should be down to the new administration to decide. There is no need for external consultation.

6 Implications

Issue	Implications
Corporate Plan	<p>Investing in our environment and responding positively to global challenges</p> <p>The Climate and Ecological Emergency is recognised as the biggest global challenge this generation will face. These proposals support reducing emissions.</p>
Financial, Resource and Property	<p>The proposals do not involve additional expenditure, but the reallocation of existing I&R funds.</p> <p>There is no specific revenue budget for climate projects at the current time, as all departments are expected to design services and commission projects that contribute.</p>
Legal, Statutory and Procurement	None identified.
Crime and Disorder	The Cycle re-Cycle project should result in improved employability skills and reduce reoffending.
Environment and Climate/Ecological Emergency	These projects help to fulfil our targets in our Climate and Ecological Emergency Action Plan.
Health and Wellbeing	The Cycle re Cycle project could improve the health and wellbeing of our more vulnerable residents.
Safeguarding of Children, Young People and Vulnerable Adults	None identified.
Risk Management and Health and Safety	None identified.
Equality and Diversity	None identified.
Privacy and Data Protection	None identified.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report.

None

8 Background Papers

None

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Environment Committee	
Meeting Date	29 th June 2023
Report Title	Public Health Funeral Policy
EMT Lead	Lisa Fillery, Directory of Resource
Head of Service	Tracey Beattie, Mid Kent Environmental Health Manager
Lead Officer	Vickie Hewson, Mid Kent Environmental Health Admin Team Leader
Classification	Open
Recommendations	That the committee approve the policy for managing public health funerals within Swale Borough Council.

1 Purpose of Report and Executive Summary

- 1.1 The public health funeral service is administered by Mid Kent Environmental Health for Swale Borough Council. Over more than 10 years, we have found most cases referred are straight forward, there are occasions where the personal circumstances of the deceased can be complicated.
- 1.2 The service has found an increasing number of cases with complex family relationships, including second and subsequent marriages, social isolation and people dying intestate. A policy will formalise decisions and provide officers with clear guidance and principles to follow when dealing with emotional situations in a clear but sensitively applied way.

2 Background

- 2.1 Under the Public Health (Control of Disease) Act 1984 Swale Borough Council is responsible for a deceased person when someone dies within its district boundary if:
 - no arrangements for a funeral or burial have been made
 - no relatives of the deceased can be found, or
 - the relatives of the deceased are unable or not prepared to arrange a funeral

The Act does not require the local authority to make funeral arrangements but rather to dispose of a dead body by burial or cremation. As the title of the act indicates, the purpose is to protect the public, by dealing with unclaimed bodies to prevent them becoming a threat to health, rather than concerns over social care or welfare. However, given the financial pressures many families are under, there are a proportion of cases where relatives are unable (funeral poverty) or unwilling (relationship breakdown) to make arrangements for the deceased.

During the Covid pandemic we saw an increase in funeral poverty to 78% of cases accepted, this then decreased in 2022 to 14% of cases accepted. However, we are again seeing a steady increase in funeral poverty in 2023 with the current rate at 25%.

The policy has been complied following research of government guidance, practices followed at other local authorities and advice from UK.Gov and officers attending training with the Institute of Cemetery and Crematorium Management.

Where possible we do try and re-coup costs, either the whole amount or at least some costs towards the funeral, but each case is different.

Table 1: Total number of public health funerals.

Total No of PHF's – 2021
9
Total No of PHF's - 2022
7
Total No of PHF's - 2023
4

With approval from members, Swale Borough Council will have transparency on its policy regarding the disposing of bodies to stop the spread of disease, and that we do this in a dignified and sensitive way.

3. Proposals

3.1 To adopt the Policy for Public Health Funerals to formalise the decision-making process for officers. (see Appendix 1)

Alternative Options Considered

To continue the service with no policy agreement from members.

Procurement

Swale Borough Council have appointed a genealogy company on a quality assurance procurement bases, as there are no financial implications on this service.

In relation to funeral directors, Swale Borough Council has an agreement with Maidstone Borough Council to use Vinters Park Crematorium and a jointly appointed funeral director services, with the agreement undertaken through Maidstone's procurement procedures. The current agreement runs from February 2022 for 3 years with a possible extension of a further 2 years.

Having secured this agreement with Maidstone Borough Council we have seen a reduction in costs for Swale's Public Health Funerals from £910 to £805.

Staffing/Requirements

Two officers from the Environmental Health Department are engaged with this service, one administration officer and a Team Leader who manages the process and leads on property searches.

All the case information, including records, documents associated with the case are logged within the Uniform database system and the associated document management system. There are no additional requirements.

Budget Information

There are no additional costs related to approval of this policy as budgets are already in place.

Table 2: Budget, cost and income from public health funerals

	Budget	PH Expense (Including staff costs)	Proceeds from estate (Including staff costs)	Balance
2020-21	£5,000	£4,160	£4,278	(£118)
2021-22	£5,000	£7,677	£3,770	£3,907
2022-23	£5,000	£4,834	£6,657	(£1,823)
2023-24	£5,000			tba

4 Alternative Options Considered and Rejected

4.1 What are the implications of **not** having a policy?

- Lack of clarity and consistency in decision making for cases administered by the authority.
- Increased risk to the council of challenge by bereaved families if Swale does not accept the case leading to potential increase in costs to Swale Borough Council.
- Increase in staff time administering the arrangements.
- Increase in costs due to potential rise in public health funerals taken.

5 Consultation Undertaken or Proposed

- 5.1 There is no requirement under the Public Health (Control of Disease) Act 1984 to undertake a consultation which places a duty on the authority to accept responsibility for the disposal of bodies as indicated in paragraph 2.1, to prevent the spread of disease.

6 Implications

Issue	Implications
Corporate Plan	Priority 4 – Renewing local democracy and making the council fit for the future. Through providing a framework for use to ensure consistency.
Financial, Resource and Property	No new financial proposals as budgets are already in place.
Legal, Statutory and Procurement	This policy will meet the council’s legal duties under the Public Health (Control of Disease) Act 1984 and the disposal of bodies to stop the spread of disease. Procurement has been undertaken following the council’s procurement procedures.
Crime and Disorder	None identified
Environment and Climate/Ecological Emergency	None identified
Health and Wellbeing	None identified
Safeguarding of Children, Young People and Vulnerable Adults	None identified
Risk Management and Health and Safety	None identified.
Equality and Diversity	We understand that due to some religious beliefs that cremations would not be appropriate, this cultural need would be respected.
Privacy and Data Protection	None identified

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Public Health Funeral Policy

Public Health Funeral's Policy

Swale Borough Council

- 1. Introduction**
- 2. Aims of Policy**
- 3. Further Information Relating to Public Health Funerals**
- 4. Property Searches**
- 5. Executors of a Will**
- 6. Administration of Estate**
- 7. Death in a Hospital**
- 8. Enquires about Help with Paying for Funerals**
- 9. Appointment of Contract Funeral Directors**

1. Introduction

- 1.1** Swale Borough Council is responsible for the funeral arrangements of people who die within their boundary, where no other arrangements are being, or are likely to be made, e.g. when the deceased has no family and they haven't left a will.
- 1.2** This responsibility is placed on the Council by Section 46 of the Public Health (Control of Disease) Act 1984. Section 46 states that the Council may recover all their costs incurred in making the funeral arrangements from the estate of the deceased (i.e. their property and possessions).
- 1.3** If a deceased resident died outside of the Swale Borough Council boundary, the funeral arrangements will be the responsibility of the local authority where they died, even if they lived in Swale.
- 1.4** Swale Borough Council will not be involved if funeral arrangements that have already been made, or if the funeral has already taken place. The Council cannot provide any funding for funeral arrangements to families.
- 1.5** Normally a partner, executor or other family member who would be responsible for making funeral arrangements for a deceased person, and they would also be responsible for the cost. Help is available from the Social Fund for those who are in receipt of certain benefits.
- 1.6** If no one is willing or able to make the funeral arrangements, the case may be referred to Swale Borough Council, who will then be responsible for making the arrangements under Section 46 of the Public Health (Control of Disease) Act 1984. Notifications generally, come from the Coroner's Office or a nursing home. The Council's Environmental Health Administration Team will make enquiries to see if there are any traceable family.
- 1.7** There have been occasions when the Coroner and the Police have made their own enquiries and drawn blanks, but Swale Council Officers have been able to locate family.
- 1.8** Swale Borough Council have appointed a company to work on tracing Next of Kin and this service is free of charge.
- 1.9** At time of publishing our policy we have appointed a company called Estates Research on a 3 year contract with possible extension of 1 year.
- 1.10** The Council receives frequent Freedom of Information requests about public health funerals, to obtain prior information on the deceased person before it is sent to the Treasury Solicitors.

2 . Aims of Policy

- 2.1** To ensure Swale Borough Council, carry out funeral arrangements in line with Section 46 of the Public Health (Control of Disease) Act 1984.
- 2.2** To provide a clear framework for officers undertaking Public Health Funerals, that they work in the best interest of the deceased and living relatives in a respectable way, and where possible to cover any costs incurred by the council.

3. Further Information Relating to Public Health Funerals

- 3.1** If the deceased had a family, the nearest surviving relative(s) will be required to sign a form stating that they are willing for the Council to make the funeral arrangements and understand that costs will be recovered from the deceased's estate. If the family have already removed any possessions from where the deceased lived, these may need to be returned to the Council to help offset the funeral costs.
- 3.2** Once the Council has accepted a case, the Environmental Health Administration Team will deal with all aspects of the organisation of a funeral, including registering the death, dealing with the funeral directors to make the arrangements, and paying for the funeral.
- 3.3** Cremation is currently the most economical option and in the absence of the deceased's wishes, the cremation service will be held at Vinters Park, Maidstone. If a check of the Council's burial records reveals that the deceased owned a grave in a Swale Borough Council Cemetery and there is room for them to be buried in it, this would also be carried out.
- 3.4** Requests for a burial, rather than a cremation are considered on a case by case basis. This may be required due to religious, cultural, or personal reasons. If the deceased did not own a grave, burial will take place in an unmarked public grave.
- 3.5** The Council's contracted funeral directors will provide a simple but dignified service, including a coffin, transport of the deceased to the Crematorium or Cemetery in a hearse, and sufficient bearers to transfer the coffin to the chapel. The funeral director will also arrange for a minister of religion or a representative of the faith of the deceased to lead the service. If a non-religious service is appropriate, a civil funeral celebrant will be used.
- 3.6** Following the cremation, the cremated remains will normally be scattered or interred in an unmarked but recorded location in the Garden of Remembrance at the Vinters Park Crematorium. In certain circumstances and by agreement the ashes may be given into the care of a close family member or friend

- 3.7** Where ashes are to be passed to family or friends, it will be their responsibility to collect the ashes from the Crematorium, with details of who will collect the ashes, date of collection, if known, so that we can inform the crematorium. The person collecting the ashes will need to take a form of identification.

4. Property Searches

- 4.1** Prior to making the funeral arrangements, Environmental Health Officers will search the last known address of the deceased. The search will focus on finding a will, evidence of family or friends, and any items that may be used to offset the funeral costs.
- 4.2** This may entail removing personal possessions from the property, including address books, correspondence, legal documents, financial paperwork and possessions such as jewellery. We only take items to cover the cost of the funeral.
- 4.3** Any financial and legal documentation removed from the property will be retained under secure conditions for a minimum of 7 years. Following the funeral some items, such as jewellery may be sold to cover the cost of the funeral.
- 4.4** Swale Borough Council will not be responsible for clearing or cleaning of the property.
- 4.4** Following the completion of the search the property will be secured and the keys returned to the landlord. If the property was owned by the deceased, the case will be referred to the Treasury Solicitor and their instructions regarding the property will be followed.

5. Executors of a Will

- 5.1** The Council will not be able to make funeral arrangements in cases where the deceased left a will and the executor is traced. In these circumstances the executor would be expected to organise the funeral.
- 5.2** If the executor wishes to revoke their duties, they must make a formal renunciation of the will and declare that they wish to have no further involvement in the funeral arrangements. They may need to go through a solicitor for this service.

6. Administration Of Estate

- 6.1** Swale Borough Council are entitled to recover their costs when making funeral arrangements under Section 46 of the Public Health (Control of Disease) Act 1984. Costs will be for the funeral and any administration costs incurred, which will also include recovering the cost of registering the Death. Admin Officer time is charged at £16.33 at time of writing this policy, admin team leader time is charged at £23.78 with Registration of Death costs £11.00.

- 6.2** They are not, however, empowered to administer the estate. Suitable enquiries of banks and building societies will be made and will put a stop on account transactions.
- 6.3** Where there is a surplus of over £500.00 from the deceased's estate, once all costs incurred in making the funeral arrangements including Officer time have been reimbursed, the Council will refer the case to the Treasury Solicitor under Bona Vacantia.
- 6.4** Where there are known family, however, the case cannot be referred to the Treasury Solicitor. Under such circumstances, the Council will hold all monies until a legally entitled person demonstrates their suitability to administer the estate through the holding of letters of administration from the courts. Under no circumstances will money or property from the estate be given to any family member without proper lawful authority.

7. Death in a Hospital

- 7.1** If the deceased died as an in-patient in a hospital managed by an NHS Trust and there are no relatives, the NHS Trust may assume responsibility for the funeral arrangements and recover their expenses from the deceased's estate.

8. Enquires about Help with Paying for Funerals

- 8.1** Enquiries to The Environmental Health Administration Team from people concerned about funeral, will be advised to discuss this with their chosen Funeral Director at an early stage in the arrangements.
- 8.2** If necessary, they should contact other funeral directors in case there are cheaper options. Enquirers will be told that there is no legal responsibility to hold a funeral, but that disposal through the crematorium or burial ground must be done legally.
- 8.3** Enquirers will also be informed that once they have entered into a contract with the funeral director, they will be responsible for paying their costs.
- 8.4** If the enquirer or a partner is receiving certain benefits, such as Income Support, Income-based Jobseeker's Allowance, Income-related Employment and Support Allowance, Pension Credit, Housing Benefit, Council Tax Benefit, Working Tax Credit or Child Tax Credit, they may be entitled to a funeral payment from the Social Fund.
- 8.5** Further information about Funeral Payments, including an application form, can be found on the Gov website at:
http://www.direct.gov.uk/en/MoneyTaxAndBenefits/BenefitsTaxCreditsAndOtherSupport/Bereaved/DG_10018660.

8.6 There is another benefit payable to people to cover funeral costs paid from National Insurance contributions. If a person who died made National Insurance contributions, the husband, wife or civil partner may be able to get a one-off, tax-free, lump-sum Bereavement Payment of £2,000, but it will depend on whether:

- they were under State Pension age when they died
- and the spouse or civil partner was not entitled to Category A State Retirement Pension when they died

8.7 The Environmental Health Administration Team makes every effort to support enquirers in taking responsibility for the funeral arrangements, to allow family and friends the opportunity to grieve and celebrate the life of the deceased.

9. Appointment of Contract Funeral Directors

9.1 To enable the Council to provide the most cost-effective means of undertaking their duty to provide public health funerals, Swale Borough Council has entered an agreement with Maidstone Borough Council to jointly procure the same funeral director and to undertake all cremations at Vinters Park Crematorium.

9.2 The procurement process and appointment of the Contract Funeral Directors is carried out by the Bereavement Services Manager at Vinters Park and tender every 3 years.

Environment Committee Forward Decisions Plan

Report title, background information and recommendation(s)	Date of meeting	Open or exempt?	Lead Officer and report author
Stray dogs kennels contract	September 2023	Open	Head of Service: Head of Environment and Leisure, Martyn Cassell Lead Officer: Alister Andrews
Climate and Ecological Emergency Annual report 2023 draft	Nov/Dec 2023	Open	Head of Service: Head of Environment and Leisure, Martyn Cassell Lead Officer: Janet Hill
BBQs in public places - review	Nov/Dec 2023	Open	Head of Service: Head of Environment and Leisure, Martyn Cassell Lead Officer: Graeme Tuff
Open Spaces and Play Strategy	January 2024	Open	Head of Service: Head of Environment and Leisure, Martyn Cassell Lead Officer: Jay Jenkins
'Scrapsgate field' horse riding review	March 2024	Open	Head of Service: Head of Environment and Leisure, Martyn Cassell Lead Officer: Graeme Tuff

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