

<b>Cabinet Meeting</b>	
<b>Meeting Date</b>	20 March 2019
<b>Report Title</b>	Air Quality Action Plan and Public Consultation
<b>Cabinet Member</b>	Cllr David Simmons, Cabinet Member for Environment & Rural Affairs
<b>SMT Lead</b>	Nick Vickers, Chief Financial Officer
<b>Head of Service</b>	Tracey Beattie, Mid Kent Environmental Health Manager
<b>Lead Officer</b>	Steve Wilcock, Environmental Protection Team Leader
<b>Classification</b>	Open
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. To note the comments and outcome of the public consultation on the draft Air Quality Action Plan 2018 - 22.</li> <li>2. To approve the additional measures in the draft Air Quality Action Plan for submission to DEFRA.</li> </ol>

## **1 Purpose of Report and Executive Summary**

- 1.1 This report forms the last in a series of reports to Cabinet charting the development of Swale's Strategic Air Quality Action Plan 2018 – 22 before submission to the Department for Environment, Food & Rural Affairs (DEFRA). This is in fulfilment of the Council's responsibility in the Local Air Management regime under the Environment Act 1995.
- 1.2 At the October 2018 Cabinet meeting it was agreed to undertake a public consultation on the measures recommended to improve air quality within the Air Quality Management Areas (AQMAs) before submitting the document to DEFRA and return to Cabinet for final approval.
- 1.3 A public consultation was undertaken from 22 November 2018 extended to 29 January 2019 because of the Christmas and New Year holidays. It required respondents to prioritise the measures they felt would improve air quality within the AQMAs and provided them with an opportunity to identify measures not included within the consultation. Three focus groups were also held in Sittingbourne, Faversham and Newington where participants could discuss in more detail the measures being proposed and identify others they felt could contribute to air quality improvements in the AQMAs.
- 1.4 Of the strategic measures proposed, the Clean Air Zone – Create a HGV Restriction Area received the most support followed by the implementation of a Low Emissions Strategy for Swale Borough Council. Development of air pollution alerts and continuing support for the Eco Star scheme attracted the least support.

- 1.5 The local measures that received the most support were for Local School and Business Travel Plans followed by improving Pinch Point Parking. A Local Low Emissions Vehicle Car Club was seen as the least important measure.
- 1.6 The comments received through the survey were wide ranging with some questioning whether the measures being proposed were radical enough to improve air quality; others were more supportive. Issues also mentioned related to housing developments, poor road infrastructure, locating freight distribution nearer to the M2, by-passes and an additional junction with the M2 between Junction 5 and 6. Many of these suggestions although understandable, do not come within the control of the Council to deliver, are financially prohibitive or only impact on air quality improvement for specific AQMAs.
- 1.7 A couple of suggestions that emerged from the focus group meetings warrant particular attention such as the omission of a link between the Local Plan and the AQAP, and a need to promote modal shift, better public transport and infrastructure for the borough.
- 1.8 A number of the issues raised can be included within the AQAP as separate measures whilst others can be included within the Low Emissions Strategy for Swale BC where they impact on corporate policies.
- 1.9 The Council has demonstrated its commitment to the issue of air quality through providing more air quality monitoring than any other Kent authority and resolving this issue is a high priority. It has to be recognised that whilst the statutory responsibility for preparing the AQAP rests with the Council, the 'big picture' solutions to air quality issues sit with Central Government. This Council is making a clear statement that we cannot wait for the improvements in air quality which will come naturally from reductions in vehicle emissions.

## **2 Background**

- 2.1 The interim Air Quality Action Plan (AQAP) approved by Cabinet (September 2017) contained air quality measures recommended from an initial source apportionment and options assessment report produced by air quality consultants Phlorum. Their report gave a baseline assessment of air quality modelled for 2018, 2020 and 2022. It also gave information on traffic counts and through automatic number plate recognition the proportion of vehicle class movements (source apportionment) for each AQMA. The purpose of the Interim AQAP was to provide Defra with our intention to form one strategic AQAP and identify potential measures which would be confirmed by assessment and detailed options appraisals.
- 2.2 The source apportionment showed that a high proportion of NO<sub>2</sub> came from diesel vehicles. Light Goods Vehicles (LGV) formed 15% of the fleet and produced 20% of the NO<sub>2</sub> emissions and Heavy Goods Vehicles (HGVs) made up only 3% of the fleet but are responsible for between 18 – 20% of the NO<sub>2</sub> emissions. The study also identified that the older vehicles produced significantly higher

emissions than the newer Euro 5 and 6 vehicles. This information informed the choice of potential AQAP measures suggested in the report, the most radical suggestion being the need for Clean Air Zone (CAZ) measures. The investigation of which form of CAZ type would be suitable required further data modelling and detailed assessment.

- 2.3** The Air Quality Steering Group chaired by Cllr Simmons approved the additional work for the next stage of the development of the AQAP. The second Phlorum consultant's report provided an evaluation of the required NO<sub>2</sub> reduction needed within each AQMA for the various CAZ models (as defined by DEFRA) with more detailed assessment of the impact various measures would have on air quality for each AQMA. The aim was to identify the best and most practical measures to deliver air quality improvements for all residents and people visiting the area.

The report identified two combinations of CAZ that could deliver necessary NO<sub>2</sub> reduction by 2022. The 'No Charge' (Scenario E) involved the targeted engagement of Euro I – IV HGVs and a 10% reduction in HGV fleet on the A2. The voluntary scheme would need signage and funding for the retro fit of Euro I-IV vehicles to Euro VI. The second option, Scenario F would involve engagement with a lower number of HGVs for retrofitting but would result in a 20% reduction in HGV fleet on the A2. This would be achieved through a charging scheme with strategic camera installations and periodic enforcement. The report also recommended implementing a number of other measures to assist with air quality improvements.

- 2.4** The Cabinet approved the report and agreed the public consultation of the measures proposed. In total seven strategic and five local measures formed the basis of the public consultation. These were;

#### **Strategic Measures**

1. Clean Air Corridor – Create a HGV Restriction Area
2. Clean Air Corridor – Signage and Information System
3. Low Emission Strategy for Swale B C
4. Swale Freight Management Plan
5. Swale Eco Star Scheme
6. Development of Air Pollution Alerts
7. Work with KCC to develop a County Wide Low Emissions Strategy

#### **Local Measures**

1. 20 is Plenty
2. Pinch Point Parking Alternatives
3. Local LEV car clubs
4. Local School and Business Travel Plans
5. Quiet Delivery Zones

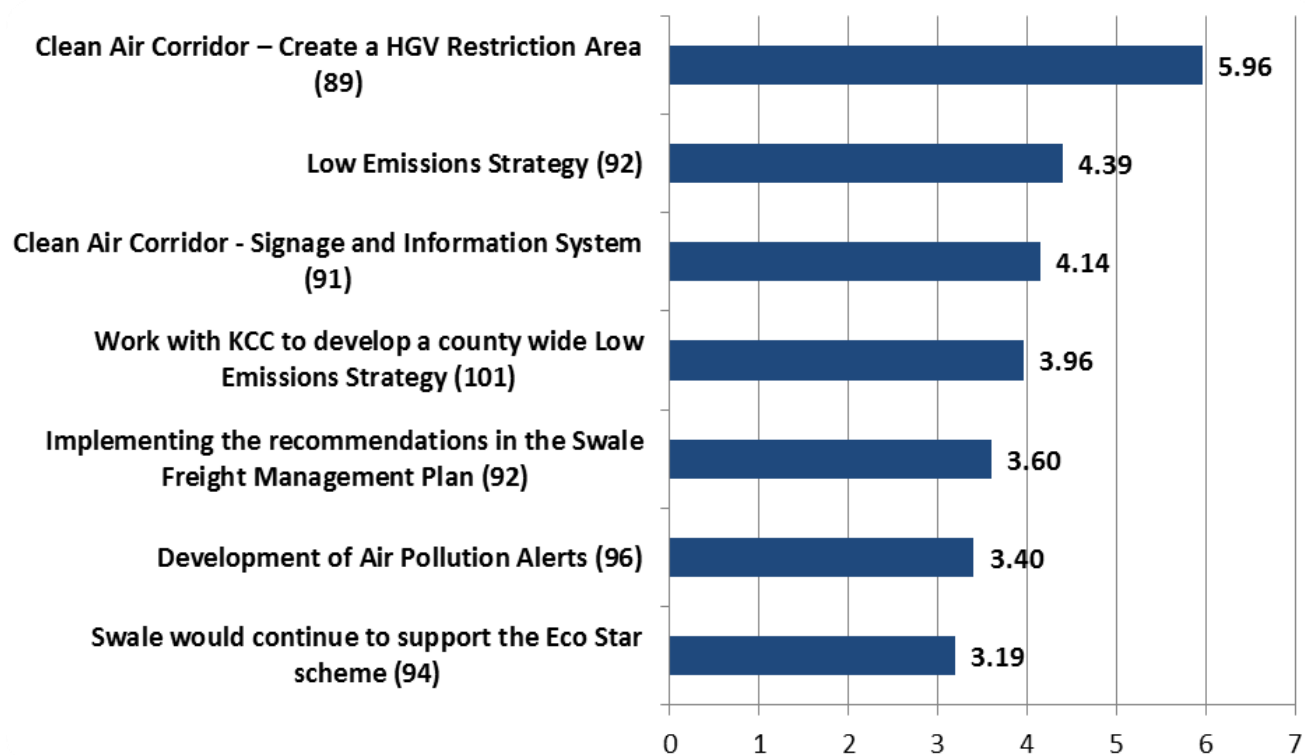
- 2.5** The consultation was open for an extended period due to the Christmas and New Year and ran from 22 November to 29 January 2019. The survey was promoted on line through the Council's website and social media channels. A post box drop of letters advertising the focus groups and survey was also undertaken to

residents in the AQMAs. Respondents were asked to put the proposed Strategic and Local measures in order of importance. A total of 151 people responded to the survey, including 20 stakeholders who included Parish Council's, Public Transport Providers and Schools.

## 2.6 Strategic Measures

As mentioned, respondents were asked to put the proposed Strategic Measures in order of importance. In order to assess this data a weighted average has been used with the measures placed as first receiving seven points, the second six points and so on with the measure ranked last given 1 point. These were then added together and divided by the number of respondents to give a weighted average.

The chart below shows the weighted average responses for the strategic measures, with the total number of respondents to each shown in brackets. No weight is applied to measure that have not been ranked. For example if a respondent only ranked their top three measures no value would be assigned to the unranked measures.



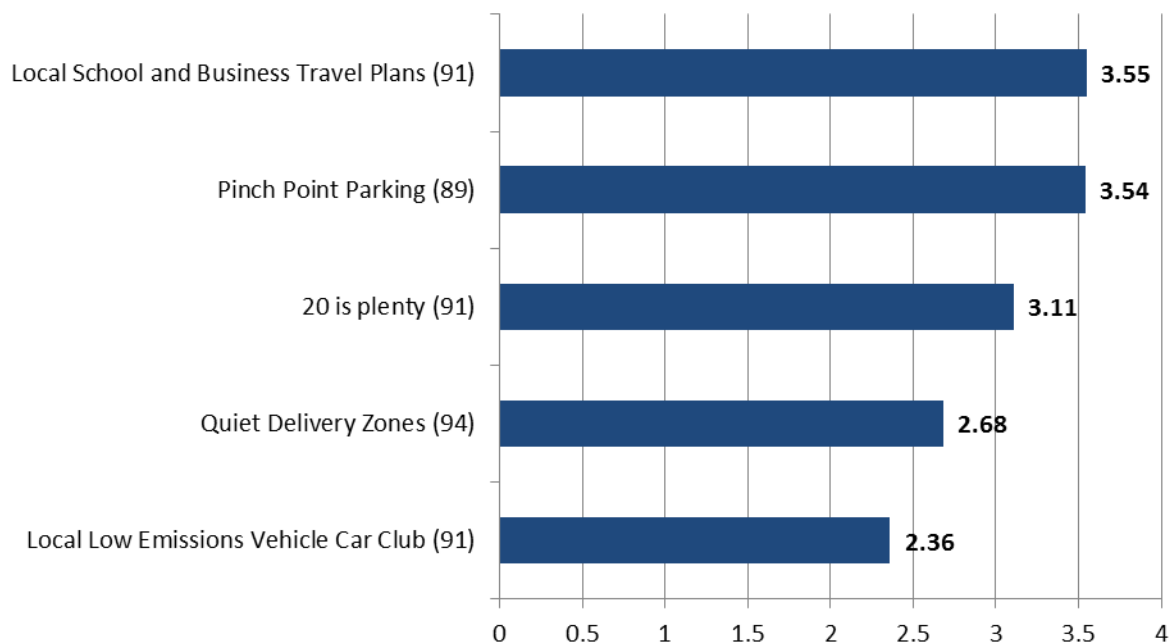
2.7 The responses show the most support for the Clean Air Corridor – Create HGV Restrictions with the greatest proportion of respondents placing this measure as first (58.4%) and lowest proportion placing it last (4.5%).

2.8 The Clean Air Zone proposal would require targeted engagement with the most polluting HGVs and 20% reduction in HGV fleet on the A2. It would most likely only be achieved through a charging Clean Air Zone scheme with strategic camera installations and periodic enforcement. The impact of an A2 charging

scheme would through time reduce HGV numbers through avoidance, diversion to the M2 and retro-fit programme.

## 2.9 Local Measures

Improving air quality will require implementation of strategic measures and complementary local measures and initiatives. Again the same methodology described in the above paragraph was used to compile the responses in the table below.



The Local School and Business Travel Plan ranked the highest measure local measure. Overall 26.4% of respondents ranked this measure as the most important (1<sup>st</sup>) and had the lowest proportion of respondents that ranked it at 5<sup>th</sup> (7.7%).

## 2.10 Other Measures – Suggestions

A total of 66 comments were submitted by respondents suggesting other measures that they felt would impact positively on air quality that they felt the Council should consider.

Theme	No. of related Comments
Planning and Development – further development of housing and commercial development mean more traffic. Any development needs commensurate infrastructure with it.	34
Traffic Infrastructure	19
Public Transport systems – improvement of current system, supporting buses	11
Modal Shift	10

Theme	No. of related Comments
Greening and Tree Planting	6
Scope to carry out air quality actions/lack of Isle of Sheppey in plan/dissatisfaction with monitoring/importance of achieving other carbon emissions reductions	7

## 2.11 Focus Groups

The focus groups provided an opportunity for residents to provide more rounded feedback on the measures proposed from the Air Quality Options Assessment Report. 40 residents attended three focus groups on the 8, 10 and 17 January held in Sittingbourne, Faversham and Newington respectively. Overall, five of the six groups placed Clean Air Corridor – create a HGV restriction area as the most important strategic measure.

The Faversham groups placed this measure top and added in joint top, the Local Plan. In Sittingbourne one group placed this measure top alongside a Low Emission Strategy with the reasoning that this was the only measure felt to be within Swale BC's control. It also felt that some of the measures being discussed should be Local Plan policies. Similarly Newington placed the same measures in their top three with all groups placing Clean Air Corridor - Create HGV Restriction Area as the most important.

- 2.12 There was a perception that the measures being proposed would not lead to significant improvements in air quality and an element of doubt that increased volumes of traffic from developments would not see a parallel increase in poor air quality. Concern was raised that the issue of particulates from traffic sources was being ignored. The concerns raised will be evaluated over the course of the AQAP through the air quality monitoring the Council undertakes and used to review the accuracy of the modelling undertaken within the options assessment report (October 2018). The focus groups did not in themselves doubt the measures being proposed.
- 2.13 There were a few consistent messages from each group which merit consideration for inclusion within the AQAP, such as the linking the AQAP with the next development of the Swale's Local Plan. Suggestions for average speed cameras along parts/whole of the A2.
- 2.14 The full Air Quality Action Plan Consultation report is provided in Appendix I

## 3 Proposals

- 3.1 The public consultation has provided a useful process enabling officers to understand the public's perception of how to address the improvement of air quality within the different AQMAs. It showed that there was wide support for the implementation of the Clean Air Corridor – Create HGV restrictions from the

strategic measures with the necessary charging and enforcement of the scheme. Although the public remain sceptical of its success.

- 3.2 The numerous suggestions to link the AQAP and the Local Plan is a logical proposal to address air quality controls for new developments and move towards advancing modal shift and infrastructure improvements that support improved air quality.
- 3.3 Many of the other suggestions made by the respondents and the focus groups could be included within a Swale Low Emissions Strategy. Where policy ownership lies under other services within the Council these would be referenced to within the document. For example a tree planting and greening policy would be the responsibility of Planning Policy and Development Control; greener licensed vehicles (Taxis and Private Hire Vehicles) sit with the Licensing Service.
- 3.4 The AQAP also needs to reflect the existing work undertaken by the Council with key groups such as the Quality Bus Partnership and the role of the Joint Transport Board have in improving air quality and encouraging modal shift.
- 3.5 The measures in the plan can be prioritised according to the weighting made from the consultation.
- 3.6 The Air Quality Action Plan has been amended to include the changes identified in 3.2 – 3.5. The format of the Action Plan remains unchanged, as this is determined by DEFRA. The amended Air Quality Action Plan measures are included in Appendix II

## **4 Alternative Options**

- 4.1 Cabinet has agreed to the consultation for the AQAP before submitting to DEFRA. The outcome has produced suggestions that strengthen and support the strategic nature of the Swale Air Quality Action Plan 2018 -22.
- 4.2 The alternative would be disregarding some or all suggestions made through the consultation process.

## **5 Consultation Undertaken or Proposed**

- 5.1 This report provides an evaluation of the consultation undertaken for the AQAP process.

## **6 Implications**

<b>Issue</b>	<b>Implications</b>
Corporate Plan	Supports the objective of being a Borough to be Proud of.
Financial,	Council allocated an additional £50,000 for Air Quality work.

Resource and Property	This has funded the SWECO traffic modelling, additional Nox tubes and will fund the additional Project Officer once appointed.
Legal, Statutory and Procurement	The AQAP will meet the Council's statutory obligation under the Environment Act 1995 to provide an AQAP that meets DEFRA approval. Adopting a new realistic and achievable AQAP will demonstrate the Council's commitment to meeting the National Air Quality Standards.
Crime and Disorder	None identified.
Environment and Sustainability	The approach will support Climate Local Swale and the Kent Environment Strategy.
Health and Wellbeing	The AQAP seeks to improve the health of the residents of the borough.
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:
- Appendix I: Public Consultation Report
  - Appendix II: Amended Strategic Air Quality Action Plan 2018 -22

## 8 Background Papers

Cabinet reports 4 October 2017, 11 July 2018, 31 October 2018

[https://services.swale.gov.uk/meetings/documents/s8358/AQAP%20report\\_postA.S.pdf](https://services.swale.gov.uk/meetings/documents/s8358/AQAP%20report_postA.S.pdf)

[https://services.swale.gov.uk/meetings/documents/s10361/Final%20-%20StrategicAQAP\\_Cabinet2017\\_draft%20v6.pdf](https://services.swale.gov.uk/meetings/documents/s10361/Final%20-%20StrategicAQAP_Cabinet2017_draft%20v6.pdf)

<https://services.swale.gov.uk/meetings/documents/s11019/aq%20cab%20oct%2018%20post%20CAB.pdf>