

# Air Quality Action Plan Consultation

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## Background

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The survey was promoted online through the Council's website and our social media channels. A post box drop of a leaflet advertising the focus groups and the survey was also undertaken and stakeholders including local transport providers and parish councils were also emailed notification of the survey.

Three focus groups were also held at Sittingbourne, Faversham and Newington, altogether 40 people attended focus groups.

The first part of this report discusses the response to the survey and the second part of this report considers the feedback from the focus groups.

There were two stakeholder submissions outside of the survey and focus group, these have been included at the end of the report.

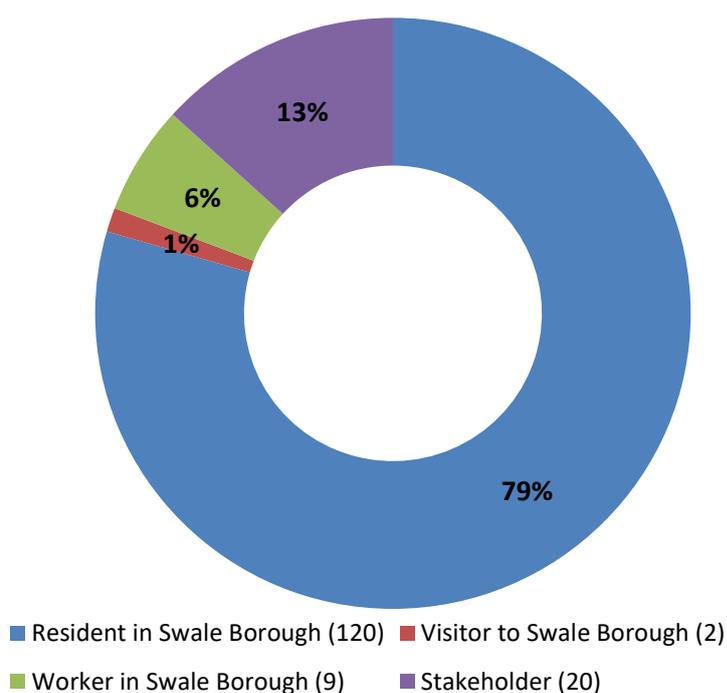
## Survey

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Please note not every respondent answered every question, therefore the total number of respondents refers to the number of respondents for the question being discussed not to the survey overall.

### Respondents

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A total of 151 people answered this question, including 20 stakeholders.

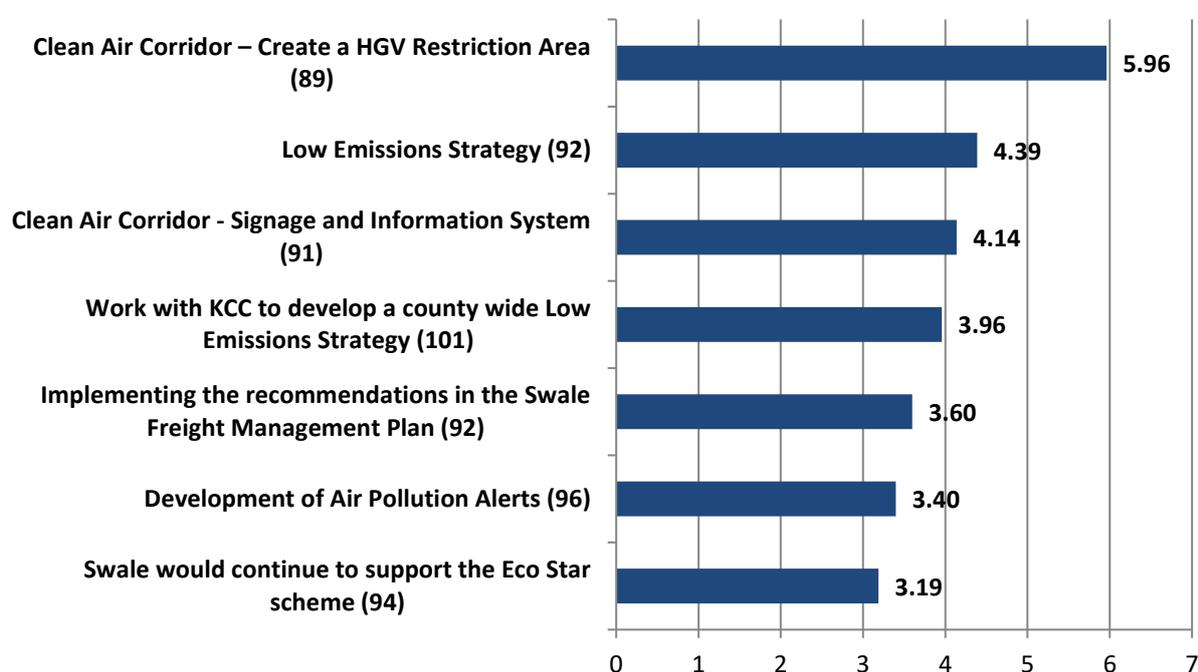
Almost four out of five respondents said they were a residents of Swale Borough.

As there were low responses from visitors and workers in the borough the responses of these groups have been included in the overall result but further analysis of these groups is not available.

## Strategic Measures

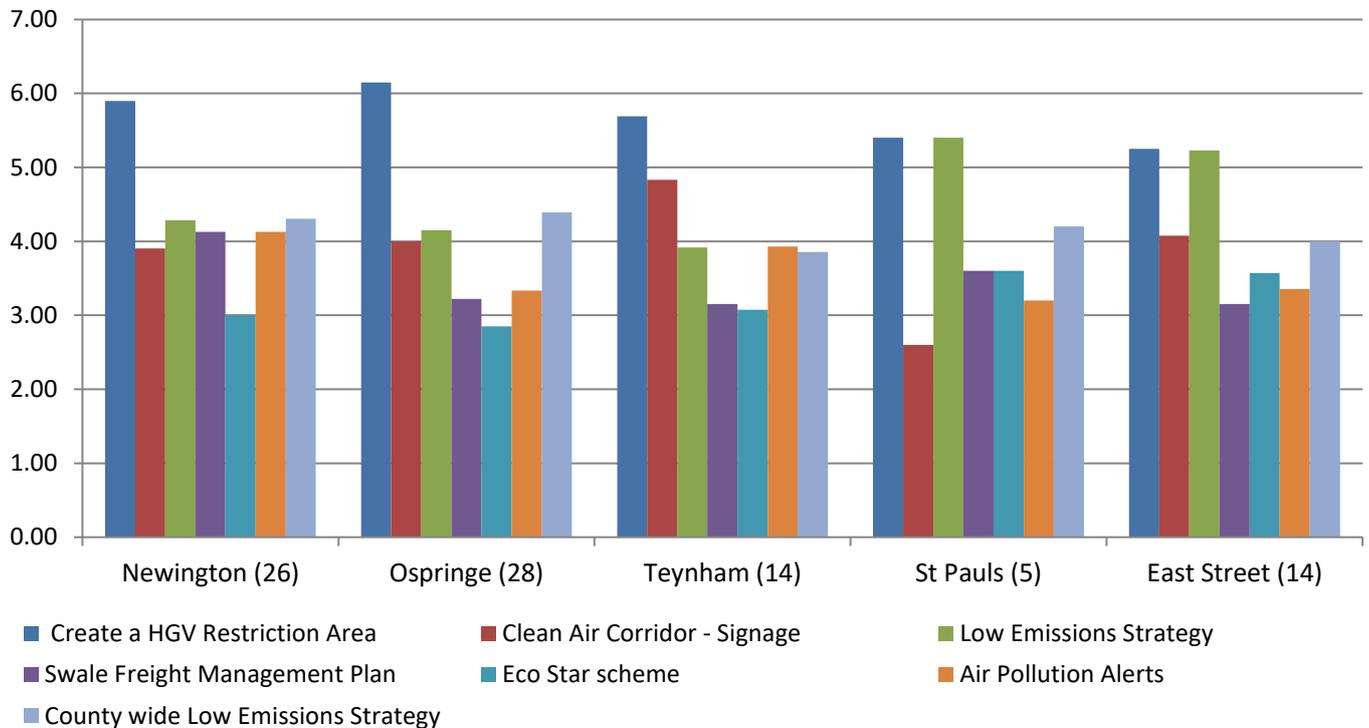
Respondents were asked to put the proposed Strategic Measures in order of importance. In order to assess this data a weighted average has been used with the measures placed as first receiving seven points, the second six and so on with the measure ranked last given 1 point. These are then added together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

The chart below shows the weighted average with the total number of respondents to each shown in brackets. No weight is applied to measures 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.



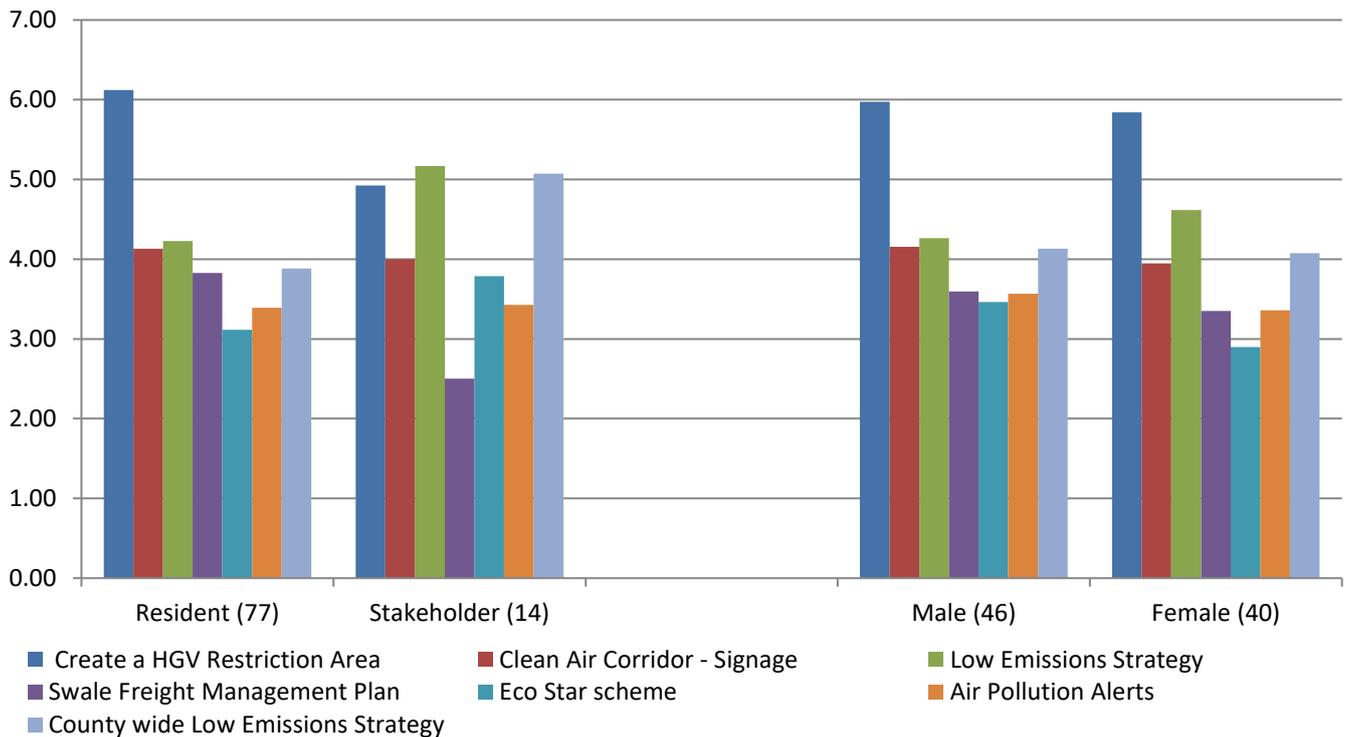
- Clean Air Corridor – Create a HGV Restriction Area achieved the greatest score. It also has the greatest proportion of respondents placing this measure as first at 58.4% and lowest proportion placing it last 4.5%. Overall, almost three out four respondents placed this measure in their top two showing strong support for this measure.
- The Eco-Star Scheme received the lowest score overall and also has the lowest proportion of respondents placing this measure first at 2.1%.
- Air Pollution Alerts also scored low with more than four in ten respondents placing this measure as sixth or seventh.
- The measure ‘Work with KCC to develop a county wide Low Emissions Strategy’ had the greatest proportion placing this measure last at 20.8%.

The data showed some differences in popularity of the measures based on where respondents lived in the borough. Caution should be used when considering the results by area due to the small populations (the maximum respondents answering in each area is shown in brackets next to area names).



- The creation of a HGV restriction area was the top scoring measure across all areas. Respondents living in and near St Pauls were split between this measure and a Swale Low Emission Strategy.
- Both St Pauls and East Street gave higher scores to a Low Emission Strategy for Swale than the other areas assessed.
- Teynham was the only area that scored Clean Air Corridor – Signage and Information System higher than either a local or county-wide Low Emission Strategy.
- Continuing with the Eco Stars scheme was the least popular measure for respondents from Newington, Ospringe and Teynham.

The chart below shows the difference in responses from residents and stakeholder and male and female respondents.



- For residents the creation of a HGV Restriction Zone is the most important measure and the continuation of the Eco-Star scheme is the lowest scoring measure – mirroring the overall results.
- Stakeholders scored a Local Low Emission Strategy as their most important measure and the implementation of the recommendations in the Swale Freight Management Plan as the least important measure.
- The profile of responses between men and women is broadly aligned with each other, except male respondents placed Clean Air Corridor- Signage and Information system as third and having a County-wide Low Emission Strategy as fourth and female respondents score these two the other way around (Signage & Information Systems being fourth and County-wide Low Emission Strategy placed third).
- The data suggests women respondents were likely to rank the continuation of the Eco-Stars Scheme as less important than male respondents.

### Other Demographics Assessed

The data was grouped by respondent's ages: 18 to 34 years, 35 to 64 years and 65 years and over. All age groups scored Create a HGV Restriction Zone as their more important measure and the Continuation of the Eco-Stars Scheme as the least important measure.

The data was grouped by respondents that had said they had a disability or long-term limiting illness and those who said they did not. Both groups also scored Create a HGV Restriction Zone as their

more important measure and the Continuation of the Eco-Stars Scheme as the least important measure.

## Comments on Strategic Measures

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There were 47 comments submitted regarding the proposed Strategic Measures.

There were fifteen comments that have been classified as being sceptical about the impacts of the proposed measures or think that the action plan should go further. Several of these stated that enforcement would be required to make the measures work. Two were concerned that the measures were too focused around freight traffic and another was disappointed that there was no mention of EU traffic. Generally these comments were uncertain that the proposed impact would be achieved or that the measures would come to fruition considering competing priorities in the borough – namely house building.

There were twelve comments about development in the borough, many expressed dissatisfaction about proposed housing developments. Several commenters said that the amount of development needs to reduce and that increased housing meant increased traffic. Others stated that developers need to consider traffic corridors. There were also a couple of people that made comment about depot and freight receivers being placed close to the motorway and the planners should consider the location of future housing development to avoid areas of high air pollution.

There nine comments that have been categorised as relating to traffic or congestion and seven that were categorised as relating to road infrastructure, several comments here related to both categories. Here it was mentioned that there was a need for a bypass or relief road or additional motorway junction to reduce or improve air pollution and congestion. Other comments in these categories said that the road network in Kent needs a strategic view with others mentioning tailbacks and increased traffic due to development.

There were five people that made comments relating to public transport. These stated there should be a greater focus on this and getting people out of cars. One person said that public transport provision was poor.

There were five people that made comments regarding HGVs. One stated they were a problem in Newington High Street and another said speeding lorries were an issue in Teynham & Lynsted. The other comments here mentioned the M2 motorway saying that access here could be improved and that companies using HGVs should be based close to the M2.

There were thirteen comments that contained a suggestion for improvement these included: building a bypass, introducing traffic calming measures such as lower speed limits, planting trees, restrictions for HGVs and on the use of wood burners, using rail for freight and development of alternative transport routes across the borough.

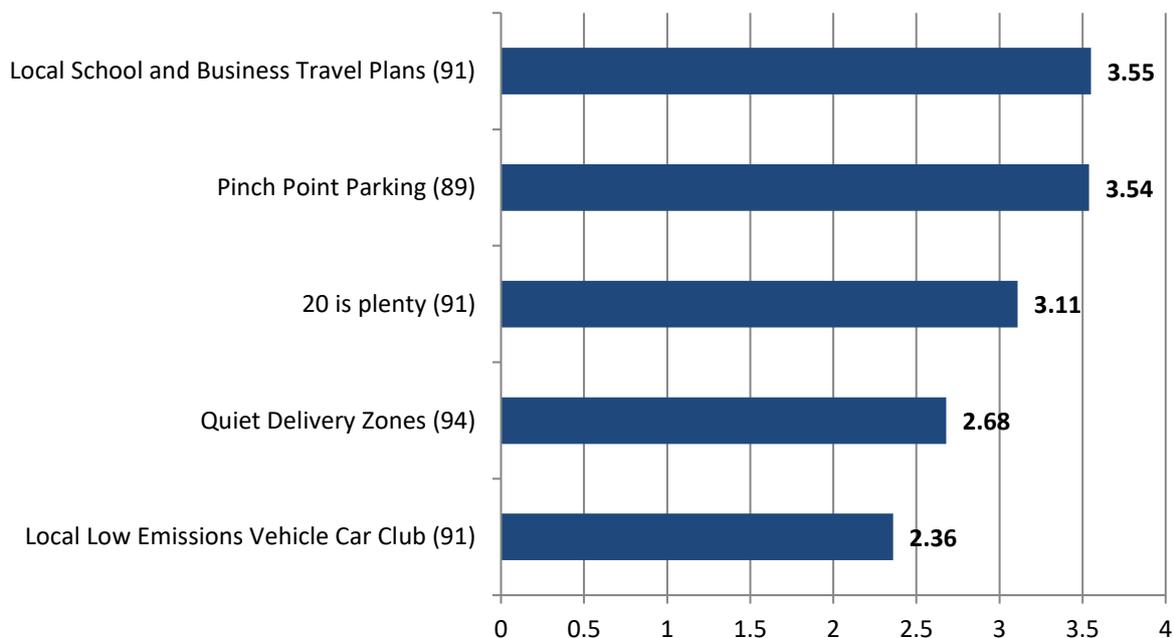
There were six comments that have been categorised as relating to the action plan. Here commenters stated the need for actions to be multi-agency and that measures need to be supported KCC. One said the strategic measures should be the most important and another said it wasn't clear how effective each measure would be in reducing air pollution and said that the approach to air

quality should start with development control and planning, this commenter was concerned that there was too much focus on HGV traffic. One commenter was positive about the 20 is plenty measure and the last comment in this group said that the priority should be on implementing the possible measures first.

## Local Measures

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

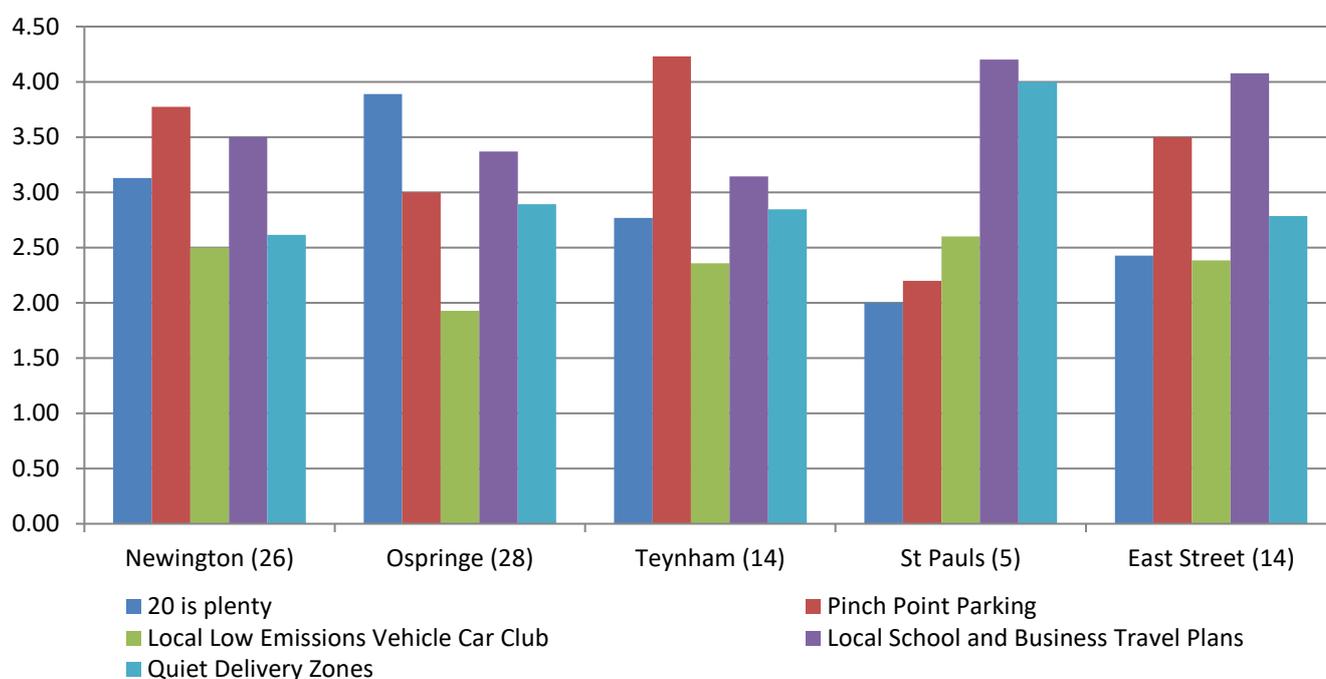
The chart below shows the weighted average with the total number of respondents to each shown in brackets. No weight is applied to measures that have not been ranked. For example if a respondent only ranked their top three measures no value would be assigned to the unranked measures.



- Local School and Business Travel Plan was the highest ranked local measure. Overall, 26.4% of respondents ranked this measure as the most important (1<sup>st</sup>). This measure has the lowest proportion of respondents that ranked this as fifth at 7.7%.
- Local Low Emission Vehicle Club was the lowest ranked local measure. This measure had the lowest proportion of respondents placing it first at 6.6% and the greatest proportion placing it fifth at 29.7%.
- Pinch-point parking had the greatest proportion ranking this measure 1<sup>st</sup> with a third of respondents answering this way. However, there was a greater proportion of respondent that placed this measure as last compared to the measure 'Local School and Business Travel

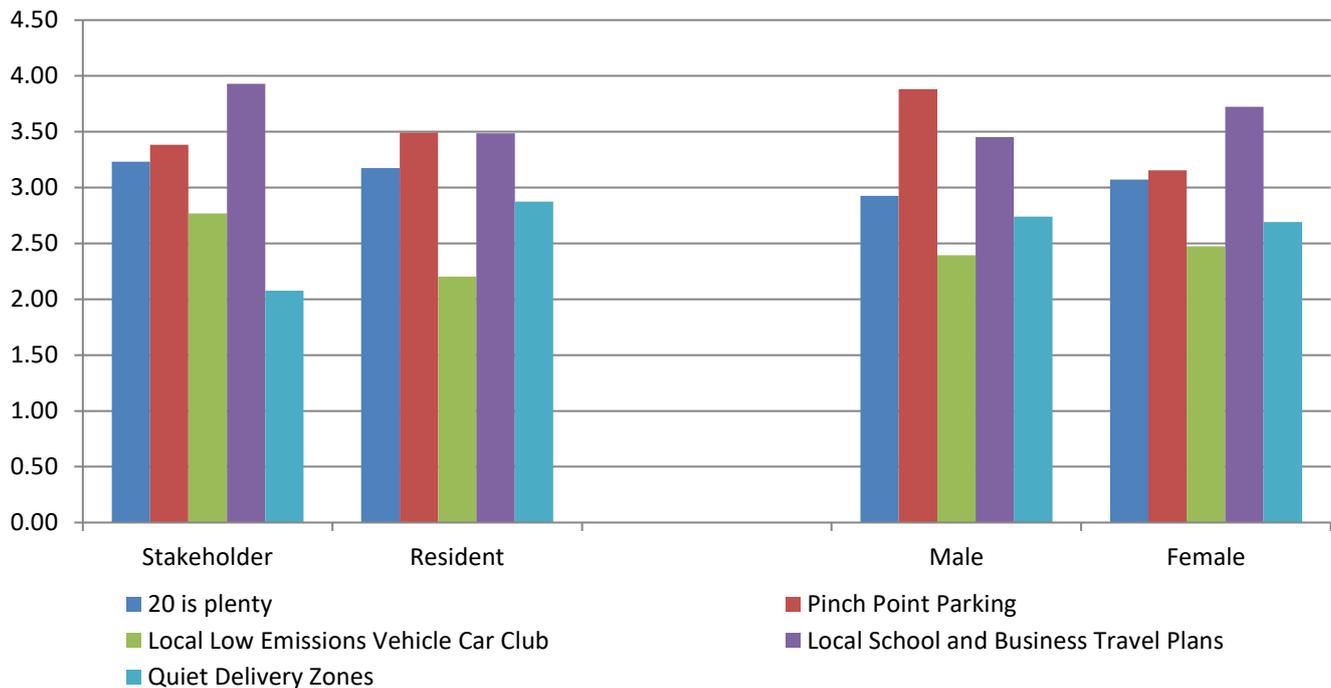
Plans. Overall, 56.2% of respondents placed this measure in their top two compared to 57.1% of respondents who placed Local School and Business Travel Plans in their top two.

The data showed some differences in popularity of the measures based on where respondents live in the borough. Caution should be used when considering the results by area due to the small populations (the maximum respondents answering in each area is shown in brackets next to area names).



- Dealing with Pinch Point Parking was the highest scoring local measure for respondents living in and around Teynham and Newington. Respondents from these areas also ranked the introduction of a Local Low Emission Vehicle Car Club as the least important measure.
- Respondents living in and around Ospringe ranked the Local Low Emission Vehicle Car Club as the lowest important measure. Ospringe ranked the 20 is Plenty Scheme as the most important measure. As this measure did not appear in the top three for Teynham, St Pauls and East Street this could suggest there were particular roads in Ospringe where residents were concerned about speeding cars.
- Respondents from in and around both St Pauls and East Street scored Local School and Business Travel Plans as the most important measure. St Pauls also scored Quiet Delivery Zone much higher than other area however due to the small survey population further research would be required to identify if this is a particular issue in this area.

The chart below shows the difference in responses from residents and stakeholder and male and female respondents.



- For Residents both Pinch Point Parking and Local School and Business Travel Plan were top, scoring the same.
- The highest scoring local measure for Stakeholders was Local School and Business Travel Plans. The lowest scoring measure for Stakeholders was Quiet Delivery Zones.
- Men and women had different highest scoring local measures with men putting Pinch Point Parking as the most important, followed by Local School and Business Travel Plans. Women placed School and Business Travel Plans as first followed by Pinch Point Parking.

## Other Demographics Assessed

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The data was grouped by respondent's ages: 18 to 34 years, 35 to 64 years and 65 years and over. The prioritisation of local measures for the 35 to 64 years and the 65 years and over groups aligns with the overall result order, with all measures in the same positions: Local School and Delivery Plans being first and Local Low Emission Vehicle Car Club being last.

The 18 to 34 years group scored Pinch Point Parking as the most important local measure and Quiet Delivery Zones and the least important local measure.

The data was grouped by respondents that said they had a disability or long-term limiting illness and those who said they did not. The ordering of local measure by respondents with a disability matches the overall result. Pinch Point Parking was the highest scoring measure for respondents without a disability, with Local School and Business Travel Plans a close second.

## Local Measure Comments

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There were 31 comments submitted regarding the proposed local measures.

The area that was most commented on was traffic and infrastructure with twelve comments concerning this. A couple of commenters suggested removing traffic lights on roundabouts to improve traffic flow and a couple mentioned reducing speed limits. As with the strategic measures there was a request for a bypass, a statement that the Electric Vehicle (EV) network needs to be addressed and another commenter that said there should be a greater focus on key junctions to prevent traffic idling.

There were a total of five comments that mentioned idling traffic in addition to the one mentioned above, with one person stating there was a problem around schools at home time and another stating it was not just an issue that schools experience and two mentioning a policy on idling of which one was concerned that to work this would require regulation and community support.

There were four comments that mentioned development in the borough with one stating the new developments require 'distance commuting' suggesting that the EV technology/infrastructure was not in place to support this. One stated that developers need to make sure developments support lower air quality by having EV infrastructure as well as well connect alternative routes for people to travel for example well-lit walkways. One person said that developments should be placed closer to employment and local facilities to prevent unnecessary car usage and the last commenter was critical of development in Swale in particular the dual carriageway, new housing and the Science Park.

Eight comments have been categorised as sceptical. Two of these stated that 20 is Plenty was the only achievable local measure, another said they didn't believe there was enough evidence to support this measure being introduced and another said this measure would only work with enforcement. There was one person who said they were uncertain as the impacts of the proposed measures were not clear and the last two commenters here were negative about Swale's ability to deliver the local measures.

There were six comments that related to public transport, with commenters stating that there should be a survey of local requirements and that the proposed measures do not focus enough on public transport. There was a suggestion of priority bus measures and it was stressed that public transport should be affordable and efficient.

There were two comments regarding school traffic with one saying more should be done to stop parents driving children to school and another querying the distance children travel by bus to attend schools in Sittingbourne.

There were three comments that specifically mentioned better monitoring and enforcement. There were three comments that were categorised as positive with one saying that a Local Low Emissions vehicle Car Club would be able to provide constructive feedback to the Council about issues experienced by this type of vehicle user. Another was positive about the 20 is Plenty measure and another commenter said that these measure should be encouraged, noting that their effectiveness is less than the proposed strategic measures.

## Other Measures - Suggestions

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Survey respondents were asked whether there were any other measures that would impact positively on air quality that they thought the Council should consider: a total of 66 comments were submitted.

The most prominent theme from these comments was planning and development with 34 related comments. There were twenty commenters that were negative about commercial and/or housing development in the borough, saying that permissions should not be given for further house building and that more housing means more cars and in turn more pollution. There were three people in this grouping that mentioned the need for developments to have the appropriate infrastructure to support EV use and four people that said there should be restrictions around the use of log burners. The other commenters in this section stressed the need for developers to consider the positioning of new development in terms of access for employment and school, having alternative travel routes and ensuring that distribution centre are located close to the motorway.

There were 19 comments relating to traffic infrastructure. In this grouping there were five comments that mentioned having a bypass, and six that stated the roads were at capacity with most of these citing developments as the reason for this, or, that development should be stopped due to an inadequate road network. Four people mentioned the removal of traffic lights to improve traffic flow with three of these specifically mentioning traffic lights on roundabouts. One person made comment about the EV charging network not being in place. One person suggested more parking restrictions near schools to reduce the impact of air pollution on children and another suggested looking at the road layouts and the idea of removing road markings.

There were eleven comments that mentioned public transport. Ten of these comments were about ensuring that there is good public transport system, improving the current system, supporting buses either through priority measures of investment and having cleaner buses. There was one person who said that more should be made of the rail network, stating that freight links previously existed.

There were ten people that made comment about modal-shift (i.e moving from cars to more sustainable transport options such as walking, cycling or public transport). The comments here included requests for cycling and walking infrastructure to be put in place, asking the council to discourage unnecessary car use and asking the council to think about car use when designing new developments and their locations.

There were six comments that stated the need for trees and greenery planting, with one suggestion green walls (also called breathing walls) to help cleanse the air. There were four comments that made comments about school traffic. Here it was suggested that there should be more walking buses and children should be educated about air quality and energy conservation. There were three comments about HGVs which suggested they shouldn't be allowed near residential areas and shouldn't be allowed to travel through Sittingbourne as peak times.

There were seven comments categorised as relating to scope or carrying out of air quality actions. One person expressed dissatisfaction that the Isle of Sheppey wasn't included in the plans and another person was critical of the current monitoring stating that inaccurate figures are being

produced. One person stated that a 'strategic approach that ensures that any measures also achieve other objectives on carbon emissions reduction' was required. The remaining four comments in the category were about the monitoring of air quality saying there needs to be more monitoring and sharing of this data.

Other suggestions included 'no idling' rules, signage about air quality in busy areas and measures around bonfires.

## Any Other Comments

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Finally, survey respondents were given the opportunity to make any further comments about the air quality action plan and the proposed measures. A total of 32 people provided additional comments.

There were eleven comments relating to the scope or delivery of the air quality actions. Three of these made comment about the monitoring of actions using data with one stating that the impacts of the measure were not clear and should be quantifiable. There was one commenter that said that the Council need to implement the actions, implying that consultation recommendations have been ignored in the past. One person commented that they thought the plan was poorly written and that the actions needed to go further. There were two comments about having more actions with one stating the actions need to be SMART and two comments about the need for the plan to join up with other departments and agency plans. One person was concerned that the focus of the plan is on Faversham and Sittingbourne, with the Isle of Sheppey left out and lastly there was one commenter who stated that the consultation exercise was duplicitous.

There were six comments that have been classed as sceptical; these commenters were dubious that improvements in air quality would be the result of implementation. One commenter said that the plan fails to 'address the harmful 'friction particulates' of PM2.5 size and below' and another also mentioned that small particles have been ignored in the plans and EVs were just as bad.

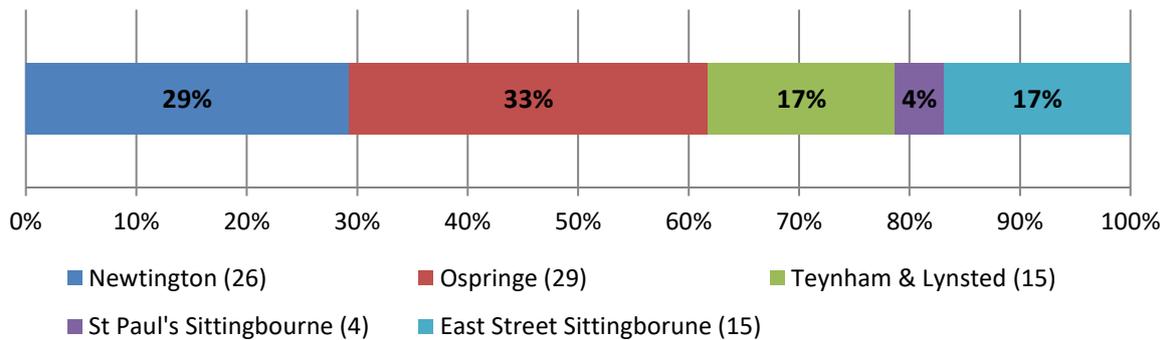
There were seven comments in this section relating to road infrastructure. One person mentioned a bypass and another mentioned turning of traffic lights on roundabouts. There was one person who was concerned the plan assumes that everyone will convert to EVs. There were three comments that expressed concern about the current road infrastructure saying that roads are congested and that idling was an issue on approaches to towns and villages. The last commenter in this section mentioned the need to look at parking space allocations and suggested looking at satellite navigation systems to gain more data. This commenter also highlighted a concern about suitable roads for the type of traffic using them.

There were three comments relating to public transport, these all urged the need for cheap and frequent bus services with one person also mentioning use of rail services. There was one comment that could not be categorised as the intention was unclear.

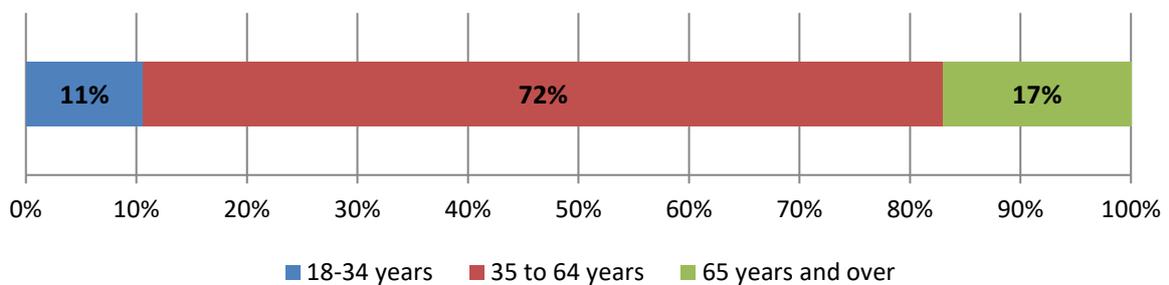
Five comments were broadly positive, with one commenter positive about the workshop which was held in Faversham. The remaining comments in the grouping were supportive of the Air Quality Action Plan stating that the measures are important and need to be implemented urgently.

## Survey Respondent Demographics

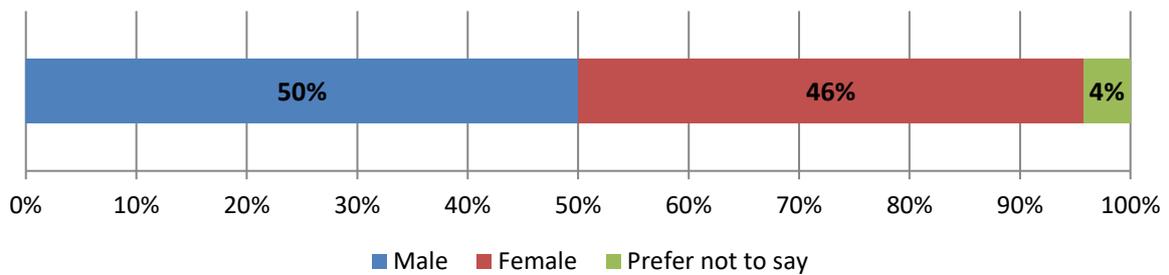
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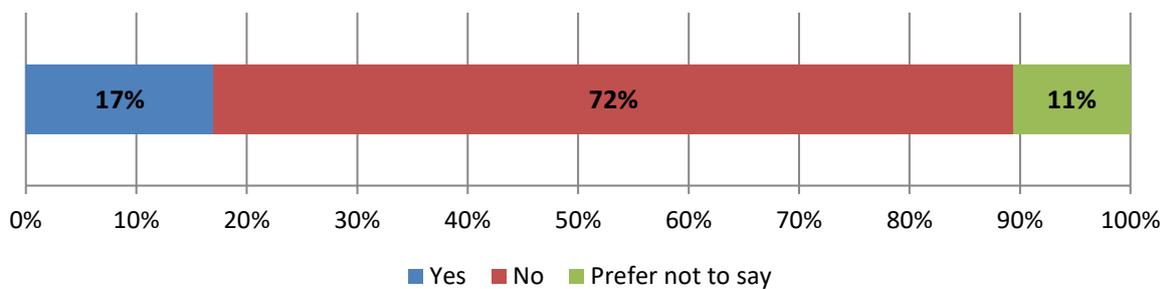
Age



Gender



Disability or Health Problem



# Resident Focus Groups

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Resident focus groups were held at three locations during the period the survey was open in Newington, Faversham and Sittingbourne. These focus groups were advertised on social media and through a leaflet drop in the local area. Altogether 40 residents attended a focus group (8 tables).

At these sessions attendees were given two tasks to complete within their group:

1. To put the strategic measures in order of preference, adding in any additional measures required. The group was then asked to make comments about the strategic measures.
2. To put the local measures in order of preference, adding in any additional measures required. The group was then asked to make comments about the strategic measures.

## Strategic Measures Order of Preference

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Different groups took different approaches to the task with one group in Faversham and one group in Newington chose not to give the strategic measures a hierarchy as they believed all were important for reducing air quality. A total of six tables produced hierarchies.

Overall, five out of the six groups placed Clean Air Corridor – Create a HGV Restriction Area as the most important strategic measure. The Faversham group placed this measure as 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 with Swale BC's control. They also felt that some of the measures being discussed should be Local Plan policies.

The Newington groups all had the same measures in their top three with both groups placing Clean Air Corridor – Create a HGV Restriction Area as the most important measure. The Clean Air Corridor - Signage and Information System was second for one table at Newington and Work with KCC to develop a county wide Low Emissions Strategy was third, whereas the other table that provided a hierarchy, at Newington placed developing a county-wide LES as second and the Signage and Information System as third.

Although all the groups were positive about a Local Emission Strategy both locally and county-wide during the discussion it was generally felt that a low emissions strategy would need KCC and wider engagement which will take longer to get acted upon, there was also a fear that Swales needs could be lost in wider plan. However, it was also reasoned that the result of this could create a more sustainable fleet and mind-set for HGV drivers for the future.

The hierarchy of the strategic measures from each group is shown at appendix A.

## Strategic Measures Comments

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**Clean Air Corridor – Create a HGV Restriction Area** – There was comment that having restrictions on HGVs is a good idea however many mentioned the need for enforcement and penalties to ensure

that restrictions were adhered to. Concerns about infrastructure and alternative routes were raised by the groups with a worry that this could just move the problem elsewhere. It was suggested that signage could be added to this measure and that this signage could be interactive

There was a comment that many of the HGVs are from Spade Lane Storage and that these vehicle movements are 24/7 and several people mentioned that a bypass is required. The other concerns that groups had was that there was no mention of reduction of cars or greater polluting cars i.e. model shift policy within the plan.

**Clean Air Corridor – Signage and Information System** – The potential impact of this measure was discussed with groups questioning if this would really change behaviour. As with the previous measure there was a concern about how this would be enforced. Another person was concerned about a potential language barrier as a lot of HGV drivers are from many other European countries.

**Implementing the Recommendations in the Swale Freight Management Plan** – Concerns were raised about how achievable this measure was with groups highlighting the ongoing works at J5 and J7. The groups held in Newington did not feel that this measure was relevant to that area as there are no overnight lorry parks.

**Low Emissions Strategy** – Several attendees commented that this measure was the only one that was in Swale BC's control. Groups were expressed scepticism that this measure would have any impact. In order to improve this measure this was suggested that that the scope of the strategy be broadened, that air pollution information is made available to the public and that it include internal functions such as procurement.

**Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019** – Concerns about impacts were raised by the groups, it was thought that while some people would join such a scheme the worst offenders were unlikely to.

**Work with KCC to develop a county wide Low Emissions Strategy** – General feeling was that while this was a good idea to ensure consistency across Kent there was a concern that specific areas of poor air quality in the borough may be lost in a strategy covering a wider geographical area.

**Development of Air Pollution Alerts** – The impact of this measure was queried by the groups with the general feeling that there would be no actual impact on air quality. It was voiced that more should be done to change polluter's behaviour and improve air quality generally rather than advising people to change their behaviours to avoid air pollution.

**General Action Plan** – There were several comments about the action plan itself with several comments that it was difficult to gauge the impact of each action and it was suggested they should be ordered in terms of biggest impact.

There were several comments about the monitoring of air quality, with requests for more monitors, in better locations and that monitoring is continuous. It was suggested that there could be on street indicators of live data. It was mentioned that there should be a link to national policy on air quality and it was also suggested that Swale lobby central government for funding and increased powers for dealing with poor air quality. There was comment that the measures should focus on residential areas.

Several attendees displayed frustration and a lack of excitement in relation to the measures, believing the consultation to be a 'tick box exercise' and the action plan to be 'toothless'. Again it was raised that alternatives to cars was not featured. One attendee expressed annoyance at a Councillor being present at the focus group.

## Local Measures Order of Preference

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Different groups took different approaches to the task with one group in Sittingbourne choosing not to give the strategic measures a hierarchy as they believed that the differing areas had different air quality issues facing them and as such there should be different priorities in each area dependant on the local issues. A total of seven tables produced hierarchies.

For six tables the measure 20 is Plenty was deemed the most important local measure, in Newington and in Faversham all tables agreed that this was the most important local measure. There was one table at Sittingbourne and one in Faversham that placed Local Schools and Business Travel Plans as the most important measure saying that routes to school are limited and footpaths are already dangerous, as they are narrow (a Faversham table had two measures ranked most important). A further four tables placed this measure as second.

Four of the seven tables ranked Local Low Emission Vehicle Car Club as the least important, three of these were tables were held in Newington with several tables voicing concerns that this could be too exclusive and not accessible to everyone.

From discussion with the groups it appears that quiet delivery zones and pinch point parking are measures that would only impact certain roads, as the groups queried the wider impact of these measures.

The hierarchy of the strategic measures from each group is shown at appendix A.

## Local Measures Comments

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**Local School and Business Travel Plans** – There was agreement that during term-time congestion was worse. Some considered that this measure could be difficult to implement and would require a strategy. It was also commented that such a scheme should apply to secondary schools as well as primary schools and that more could be done around car sharing and walking buses. There was a suggestion that school start times could be staggered to reduce congestion and it was also suggested that commercial vehicle could be kept of the roads before 9am.

**20 is plenty** – This measure was well received with several comments about how this could make the roads safer. There was however, comment that this was not a new idea as it is already being campaigned for by a local action group. There was a concern about how this could or would be enforced.

**Pinch point parking** – It was discussed that the A2 was narrow in certain places and that there was on-road parking which restricts traffic flow. There was safety concern raised in relation to the school and people being clipped by vehicle wing mirrors when using the footpath.

**Local Low Emissions Vehicle Car Club** – Although this was considered a well-intentioned measure the groups did not rate this measure highly. Concerns were raised about the high cost and maintenance of low emission vehicles feeling that they are not currently accessible to all due to the limitations of the technology (long journeys and lack of charging infrastructure). One group considered the same impact could be achieved by through more car sharing.

**Quiet Delivery Zones** – It was commented that this measure does not to relate to Newington as there are not large depots, although it was expected that timings of deliveries may alter congestion at the busiest times. There was a concern that from an efficiency perspective this measure would be undeliverable in rural areas and how it would be enforced. The impact of this measure was queried as some considered the majority of commercial vehicles in the borough were passing through rather than stopping for deliveries. There was also a query about how to engage with goods shippers and operators in order to implement this measure.

**General Action Plan** – It was commented that these measures should be part of the Local Plan suite of policies.

## Other Focus group Comments & Suggestions by Theme

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### Transport Infrastructure & Roads

The need for an idling policy was mentioned several times and there were repeated requests for a bypass. Requesters for a bypass say this is justified as the M2 is under used and the A2 was too narrow as in places two lorries, going in opposite directions are unable to pass each other. It was also suggested that the road should be widened in Newington. However, concerns were raised that a bypass could result in an increase in traffic and who would pay for it.

It was suggested several times that traffic lights should be removed, in particular on roundabouts. It was also suggested that traffic lights could have a countdown to when they are going to change.

There were several comments about lorries and signage at Church Lane and requests for speed cameras on the A2. There was also the suggestion that Bull Lane in Newington should become a one-way system

### Planning and Development

Several comments were made that relate to the Local Plan saying that that its priority should be sustainable transport policies/plans for all new developments, the aim being to cut car use and emissions through a joined up cycling, walking and EV charging infrastructure.

It was also suggested that Planning Policy create a development emissions standard and an air quality SPD.

It was commented that many new developments in the borough are dependent on cars and that developers should be thinking more about access, connectivity and alternative travel arrangements that are sustainable such as cycling and walking, and avoid areas where air quality is poor.

In terms of infrastructure in new developments for EVs a concern was raised that too much planning infrastructure for EV vehicles and parking space allocation in new developments encourages more car use.

There was a query about if brownfield sites were being utilised and a suggestion that contributions from developments should be increased. It was proposed that S106 contributions should fund filtration and forced air systems for local residents.

It was suggested that there could be a review of the Faversham Plan to relocate industry out of town and release the land for sustainable housing alongside this was positive comments about the proposed move of M&S and Gist closer to motorway.

### **Public Transport & School Transport**

There were some suggestions about buses – it was suggested that public transport should be joined up and that subsidised buses should be re-instated, and that the buses should be retrofitted. There was also a suggestion for introducing a Park & Ride Service and a regular bus on the A2 to reduce the number of car journeys.

It was commented that some routes were unsafe for driving children to school due to the layouts of the roads and that the quickest or less polluted routes might not be the safest. One area in particular that was raised was Highsted Road where there was no pavement but the route is used by children going to and from school.

### **Electric Vehicles (EVs)**

There were several comments about EVs and the infrastructure required to support them. It was highlighted that outline planning permission had been given in relation to KCC Electric Vehicle Infrastructure Plan but that two years on there were still no charging points.

There was a concern that the some roads and paths in the borough (Newington was used as an example) are too narrow to enable electrical charging points for cars. This prompted a suggestion that, since charging points will be limited, maybe solar panels could be used to supply the electricity – however there was some scepticism that this would not be achievable or workable.

It was also suggested that incentives should be introduced to increase the take up of EVs/make them more desirable with an example being free parking for low emission vehicles.

### **Health**

Comments were made that cycle provisions in the borough are too poor for cycling to be an alternative to driving. Safety concerns were also raised in regard to cycling.

There was a group that were concerned that there was no mention of PM 2.5 particle in the plan and highlighted that new data on this had recently been released by Public Health England.

It was also commented that the plan does not mention biodiversity and suggested that more trees need to be planted.

## Other Consultation Responses

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There were two written stakeholder responses that were received. These are shown in full below.

### Stagecoach

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**Sent:** 09 January 2019 14:49

**Subject:** SWALE BOROUGH COUNCIL AIR QUALITY ACTION PLAN 2018-2022

Dear Mr Wilcock

I have received the Executive Summary of the AQAP, and would comment as follows:

**From the Introduction:**

*"This Steering Group is made up from the key stakeholder partners; including members and officers from Environmental Health, Planning and other Council departments, and representatives of key external partners, in-particular Kent County Council. "*

It is surprising and disappointing that "key stakeholder partners" did not include representation from the Bus Operators who are party to the Swale Quality Bus Partnership, to which Swale Borough Council is also a party.

We would welcome measures to **"encourage alternative modes to car use to reduce congestion and pollution"**, although the report makes no mention of bus services, the role they can play in reducing dependency on car use, or what these measures might be. Swale's track record in this regard is less than impressive, and has led to the removal of buses from Sittingbourne High Street to make way for a street market, the remodelling of the town centre with no facility for terminating buses to stand between departures (resulting in circuitous and unnecessary journeys around the town centre), inadequate bus stop infrastructure and the construction of a large multi-storey car park as part of the Spirit of Sittingbourne development, which will only encourage greater car use. To this we can add a failure to allocate a realistic budget to improve the waiting environment for bus users with more and better maintained shelters, and a general lack of enthusiasm in tackling parking issues that impede the operation of bus services.

**From Appendix 1:**

**Items 1 and 2:** We note proposed measures to create **Clean Air Corridors**, with the aim of achieving a reduction in pre Euro VI HGVs. We will leave it to the road haulage industry to comment on the viability of this. Buses are not mentioned in this context, but if they were, we would comment as follows:

The majority of Stagecoach bus services operating in Swale are run with buses meeting Euro V standard, with a small number of journeys run with buses compliant with Euro III or Euro IV. Current plans envisage that the Euro III buses in the local fleet will be replaced with newer vehicles compliant with Euro V.

Stagecoach fleet policy is to replace older buses with new ones meeting the latest Euro VI standards rather than retrofit kits intended to improve emission standards. We have found that such retrofits increase fuel consumption and engine wear, which results in premature engine failures and

consequent higher repair costs. The capital costs of the retrofits cannot be justified on vehicles with limited remaining life expectancy. Further, the viability of most bus services in Swale cannot support the capital cost of brand new buses.

**From Appendix 2:**

**Item 8 "20 is plenty" zones:** Stagecoach is generally supportive of the introduction of 20mph zones in appropriate locations and circumstances, as the reduction in traffic speeds lead to reduced accidents and casualties. However it is doubtful that such measures would result in improved air quality. 20mph zones usually contain traffic calming measures (either horizontal or vertical deflection) which means that a consistent speed cannot be maintained. The frequent acceleration/deceleration, coupled with the need to drive in a lower gear tends to result on lower fuel consumption for all vehicles. Poorer fuel consumption results in more pollution.

**From Appendix IV:**

**Item 10: "*That partners providing services, e.g. provision of taxis for taking children to school, and bus companies, consider the fuel that is being used*":**

Stagecoach already uses diesel fuel with at least a 10% bio content, which results in lower particulate emissions compared with standard diesel.

**Item 12: "*That 'on-demand' bus service initiatives should be looked into*":** An "on-demand" service already exists in Sittingbourne. This is operated by Arriva and is branded Arriva Click.

*"The AQ Steering Group will pursue discussions with KCC on the viability of this proposal, taking into consideration the impact this type of service may have on the licensed taxi trade within the borough "*  
The lack of mention of the possible impact on operators of registered local bus services is disappointing and concerning.

**Item 13: "*That taxi and bus licensing to improve to be more 'green'*":** Whilst Swale Borough Council is the licensing authority for taxis, the licensing of bus operators and their vehicles is a matter for the Traffic Commissioner and the Driver and Vehicle Services Agency, not the Council.

**Item 14: "*That bus stop lay-bys be added to enable vehicle flow*":** Other than at termini or other layover points, bus operators generally are not supportive of bus stop lay-bys. Buses are usually delayed trying to re-enter the traffic flow (leading to delays, longer and less attractive journey times, and hindering reliability) and the lay-bys themselves tend to encourage other vehicles to park in them, resulting in the stop becoming obstructed. This in turn causes issues for bus users with reduced mobility. This appears to be a measure designed to ease car use and runs contrary to the stated aim of encouraging alternative modes to car use to reduce congestion and pollution.

Thank you for giving us the opportunity to comment.

## Public Health England

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Re: Swale Borough Council Air Quality Action Plan 2018-2022

Thank you for your correspondence of 18 December 2018 in which a draft of the above Air Quality Action Plan (AQAP) was shared for consultation.

Public Health England (PHE) is the expert national public health agency which fulfils the UK Secretary of State for Health's statutory duty to protect health and address inequalities, and executes his power to promote the health and wellbeing of the nation. PHE is an executive agency of the Department of Health and Social Care (DHSC). It is a distinct delivery organisation with operational autonomy to advise and support national government, local authorities and the NHS in a professionally independent manner.

Within the UK, air pollution is the largest environmental risk linked to deaths every year<sup>1</sup>. The current evidence indicates that air pollution can be associated with cardiovascular disease, lung cancer, respiratory disease, asthma and stroke. Air pollution disproportionately affects the young, older people, those with underlying cardiopulmonary conditions and the most deprived within our communities. This may result in reduced physical activity, increased hospital attendance and premature mortality.<sup>2</sup>

Air pollution is now associated with much greater public health risk than was understood even a decade ago, and more risks are emerging.

We welcome the development of this draft AQAP, to help tackle poor air quality in Swale. The draft AQAP proposes a range of measures, many that are ongoing, to reduce air pollution as a contributor to ill-health; and support the UK Government in meeting the EU air quality thresholds. 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; community cohesion and road safety.

### **Mitigation and complementary measures**

PHE supports measures to reduce sources of air pollution and people's exposure, such as those outlined in the draft AQAP. As well as measures targeting defined areas which may otherwise not be fully compliant, such as the East Street and Ospringe Air Quality Management Areas (AQMAs), we note that many of the measures outlined are aimed at improving air quality across the Council's area. This acknowledges the transient nature of pollution; whereby the negative effects of air pollution may occur at locations other than where the emissions occur. There are no thresholds of effect identified for nitrogen dioxide (NO<sub>2</sub>) and particulate matter and therefore health benefits can be expected from improving air quality even below concentrations stipulated by the EU and UK standards.

Interventions can seek to remove sources of pollution, reduce the levels, or enable people to minimise personal exposure to air pollution. We note that the draft AQAP proposes all three approaches, for example promoting travel alternatives (measure 11) will remove some vehicle pollution sources, the Heavy Goods Vehicle (HGV) "Clean Air Corridor" (measure 1) will reduce

emissions along the A2, while air pollution alerts (measure 6) should enable vulnerable people to avoid or reduce exposure.

Preventative interventions, which remove sources of pollution, are likely to have the largest impact. However, we would particularly encourage the use of 'packages of interventions' to suit your target areas and population. These interventions could be assessed on their combined effectiveness and potential impact. For example, the "Clean Air Corridor" signage and information scheme in isolation may only show small improvements, but introduced together with Eco Stars driving measures, the Swale Freight Management Plan, and school/business travel plans, it can all help to make a difference to pollutant concentrations as well as potential public health co-benefits such as improved uptake of walking/cycling. We encourage evaluation strategies to be put in place where possible to monitor the effectiveness and share wider learning.

### **Recommendations**

We would recommend:

1. including more supporting detail for the decision to target East Street and Ospringe AQMAs. The AQAP mentions that the three other AQMAs (St Paul's, Teynham and Newington) will be fully compliant by 2020 or 2022, however the compliance measures aren't clearly explained.
2. widening the definition of vulnerable people (measure 6) to include those with asthma, heart disease and pregnant women. There is robust evidence linking exposure to air pollution with adverse health effects in wider population groups.<sup>3</sup>
3. considering which alternative routes may be used by non-compliant vehicles if the proposed Clean Air Corridor is introduced, and whether this may simply shift the pollution problem.
4. attempting to quantify the Target Pollution Reduction for the listed interventions, as this may assist with the prioritisation exercise. This should be extended to any packages of interventions which are proposed.

### **Summary**

In summary, interventions that are aimed at reducing air pollution can contribute to increased life expectancy and also help reduce premature deaths from cardiovascular and respiratory disease. We 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.

### **References**

1. Public Health England (PHE). Public Health Matters - Understanding the impact of particulate air pollution, 2015 Available at: <https://publichealthmatters.blog.gov.uk/2015/11/03/understanding-the-impact-of-particulate-air-pollution/>
2. World Health Organization (WHO). Review of evidence of the health aspects of air pollution - technical report, 2013. Available at: <http://www.euro.who.int/en/health-topics/environment->

[and-health/air-quality/publications/2013/review-of-evidence-on-health-aspects-of-air-pollution-revihaap-project-final-technical-report](#)

3. Public Health England (PHE). Health Matters: air pollution, 2018. Available at: <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

<b>Sittingbourne Table 1</b>	
1.	Clean Air Corridor – Create a HGV Restriction Area
2.	Implementing the recommendations in the Swale Freight Management Plan
3.	Work with KCC to develop a county wide Low Emissions Strategy
4.	Development of Air Pollution Alerts
5.	Clean Air Corridor - Signage and Information System.
6.	Low Emissions Strategy
7.	Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019

<b>Sittingbourne Table 2</b>	
1.	Low Emissions Strategy & Clean Air Corridor – Create a HGV Restriction Area
3.	Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019 & Clean Air Corridor - Signage and Information System.
4.	NEW Local Plan Policies
5.	Development of Air Pollution Alerts
6.	Work with KCC to develop a county wide Low Emissions Strategy
7.	Implementing the recommendations in the Swale Freight Management Plan

<b>Sittingbourne Table 3</b>	
1.	Implementing the recommendations in the Swale Freight Management Plan
2.	Clean Air Corridor - Signage and Information System.
3.	Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019
4.	Clean Air Corridor – Create a HGV Restriction Area
5.	Work with KCC to develop a county wide Low Emissions Strategy – linked to below
6.	Low Emissions Strategy – linked to above
7.	Development of Air Pollution Alerts

<b>Faversham Guild Hall</b>	
1.	Clean Air Corridor – Create a HGV Restriction Area & Local Plan
3.	Work with KCC to develop a county wide Low Emissions Strategy & Clean Air Corridor - Signage and Information System & Low Emission Strategy
5.	Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019
6.	Development of Air Pollution Alerts
7.	Implementing the recommendations in the Swale Freight Management Plan

<b>Newington – Table 1</b>	
1.	Clean Air Corridor – Create a HGV Restriction Area
2.	Clean Air Corridor - Signage and Information System
3.	Work with KCC to develop a county wide Low Emissions Strategy
4.	Low Emissions Strategy
5.	Development of Air Pollution Alerts
6.	Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019
7.	Implementing the recommendations in the Swale Freight Management Plan

<b>Newington – Table 2</b>	
1.	Clean Air Corridor – Create a HGV Restriction Area
2.	Work with KCC to develop a county wide Low Emissions Strategy
3.	Clean Air Corridor - Signage and Information System
4.	Development of Air Pollution Alerts
5.	Swale would continue to support the Eco Star scheme beyond the current funding which ends in 2019
6.	Implementing the recommendations in the Swale Freight Management Plan
7.	Low Emission Strategy

<b>Sittingbourne Table 1</b>
No order for local measures as this is dependent on each local area so group suggestion that Local measures should be examples and each area should have its own relevant actions.

<b>Sittingbourne Table 2</b>
1. Local School and Business Travel Plans
2. 20 is plenty
3. Pinch point parking
4. Local Low Emissions Vehicle Car Club
5. Quiet Delivery Zones

<b>Sittingbourne Table 3</b>
1. Pinch point parking & 20 is plenty
3. Quiet delivery zones & Local School and Business Travel Plans
5. Local Low emission vehicle car club

<b>Faversham Guild Hall Table 1</b>
1. 20 is plenty
2. Local schools and Business Travel Plans
3. Local Low Emission Vehicle Car Club
4. Pinch point Parking
5. Quiet delivery zones

<b>Faversham Guild Hall Table 2</b>
1. Local School and Business Travel Plans & 20 is plenty
3. Quiet Delivery Zones
4. Local Low Emission Vehicle Car Club
5. Pinch Point Parking

<b>Newington Table 1</b>
1. 20 is plenty
2. Pinch point parking
3. Local School and Business Travel Plans
4. Quiet Delivery Zones
5. Local Low Emission Vehicle car club

<b>Newington Table 2</b>
2. 20 is plenty
3. Local School and Business Travel Plans
4. Quiet Delivery Zones
5. Pinch Point Parking
6. Local Low Emission Vehicle Car Club

<b>Newington Table 3</b>
1. 20 is plenty
2. Local School and Business Travel Plans
3. Pinch Point Parking
4. Quiet Delivery Zones
5. Local Low Emission Vehicle Car Club

