

Agenda

Environmental Services and Climate Change Committee Meeting

Date: Thursday, 10 July 2025

Time 7.00 pm

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

Membership:

Councillors Shelley Cheesman, Alex Eyre, Carole Jackson, Elliott Jayes (Vice-Chair), Rich Lehmann, Peter Marchington, Claire Martin, Charlie Miller, Pete Neal, Chris Palmer, Ashley Shiel, Julien Speed, Paul Stephen, Sarah Stephen and Dolley Wooster (Chair).

Quorum = 5

Pages

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1. Emergency Evacuation Procedure

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- (d) Anyone unable to use the stairs should make themselves known during this agenda item.

2. Apologies for Absence

3. Minutes

To approve the Minutes of the [Meeting](#) held on 18 March 2025 (Minute Nos. 749 – 755) and the [Meeting](#) held on 14 May 2025 (Minute Nos. 24 – 25) as correct records.

4. Declarations of Interest

Councillors should not act or take decisions in order to gain financial or other material benefits for themselves, their families or friends.

The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPIs) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

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.

5.	Waste and Street Cleansing Service Annual Report 2024-25	5 - 60
6.	Swale Local Walking and Cycling Infrastructure Plan	61 - 246
7.	Revocation of Air Quality Management Areas in East Street (AQMA 3) and Teynham (AQMA 5) due to air quality improvements and recommendations from Defra	247 - 320
8.	Open Spaces Strategy Update Report	321 - 328
9.	Grounds Maintenance Savings Report	329 - 334
10.	Public Conveniences Review - Business Case and Consultation Launch	335 - 398
11.	Items for Noting	
12.	Forward Decisions Plan	399 - 400

13. Exclusion of the Press and Public

To decide whether to pass the resolution set out below in respect of the following items:

That under Section 100A(4) of the Local Government Act 1972, the press public be excluded from the meeting for the following items of business on grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3.

3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).

- | | | |
|-----|--|-------|
| 14. | Grounds Maintenance Contract Savings - Exempt Appendix 1 | 401 - |
| | Implications - Financial, Resources and Property | 402 |
| 15. | Public Conveniences Review - Business Case and Consultation Launch | 403 - |
| | - Exempt Appendix I & Appendix IV | 424 |

Issued on Wednesday, 2 July 2025

The reports included in Part I of this agenda can be made available in alternative formats. For further information about this service, or to arrange for special facilities to be provided at the meeting, please contact democraticservices@swale.gov.uk. To find out more about the work of this meeting, please visit www.swale.gov.uk

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

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Environmental Services and Climate Change Committee Meeting	
Meeting Date	10/07/25
Report Title	Annual performance report for waste collection and street cleansing service 2024/25
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment & Leisure
Lead Officer	Alister Andrews, Environment Services Manager
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To discuss the contents and approve publication of the report on the council website. 2. It is recommended that the Waste Member Working Group set up for mobilisation of the new service is ended.

1 Purpose of Report and Executive Summary

- 1.1 This is the first Swale Borough Council annual waste collection and street cleansing report. It covers the service performance from April 2024 to March 2025 and delivers against one of the recent Waste and Street Cleansing Scrutiny review recommendations (an annual report). A further mid-year report will be submitted for discussion at Environmental Services and Climate Change Committee later in the year. This will be a *'lighter touch'* update on service performance.

2 Background

- 2.1 Suez were awarded the contract for Mid Kent in 2023. The Mid Kent Waste Partnership includes Ashford Borough Council, Maidstone Borough Council and Swale Borough Council. Suez undertake bin collections for all councils and street cleansing for Ashford and Swale only.
- 2.2 The mobilisation of a contract of this size was complex and various changes were required to meet the corporate priorities set by Members. Amongst other changes, a new fleet of vehicles was procured by the council; a full re-route of collections was undertaken; and new software and hardware was introduced to meet environmental and financial requirements.
- 2.3 The changes impacted service significantly and poor performance led to the creation of a cross-party Member working group to investigate and review the

reasons behind the performance. This group discussed their report and published their findings in January 2025.

- 2.4 The contract is an eight-year contract that started in March 2024.
- 2.5 Suez have recently produced their own annual report for the Mid Kent contract (see appendix II).
- 2.6 The Council's report does not only cover the contract with Suez, it details related activity undertaken by the Council's own Contracts team and Environmental enforcement team.
- 2.7 As it is the first report of its kind, officer's welcome input from Members on what they would like to see in future iterations.
- 2.8 During the tender and mobilisation periods of the new service, a cross-party Member working group was created to oversee project - streamlining officer updates, giving a forum to seek informal Member viewpoints and to help inform reports for formal decision at Committee. The working group also oversaw recovery from the period of disruption. With the final strands of mobilisation virtually complete, Members are asked to consider the future of the working group.
- 2.9 This coincides with changes to the administration structures, where new committee briefings will be implemented. As a result, one of the recommendations in this report is to end the Waste Member Working Group that was set up for mobilisation of the new service. It is intended that as part of the new committee reporting process, there will be more opportunities for members to comment on the service.

3 Proposals

- 3.1 To discuss the contents of the annual report and approve publication on the council's website.
- 3.2 To discuss ending the Waste Member Working Group meetings that were originally set up for contract mobilisation.

4 Alternative Options Considered and Rejected

- 4.1 Do nothing - The council are not statutorily obliged to produce an annual report.

5 Consultation Undertaken or Proposed

- 5.1 As part of the 2024/25 Member Scrutiny review, the cross-party Member working group carried out a range of workshops and interviews with staff from both the

council and Suez, and reviewed feedback from more than 2,000 responses to the public survey. This work led to 23 recommendations from the group, which were discussed and agreed by the Environment and Climate Change Committee at a meeting on Wednesday 15 January 2025.

6 Implications

Issue	Implications
Corporate Plan	The waste collection and street cleansing contract is the council's largest contract and it impacts every resident in the borough. Therefore, it is relevant to many of the corporate priorities.
Financial, Resource and Property	The costs of this contract will be reported in the end of year financial reports. The new fleet cost just over £7M for Swale (excluding annual fleet financing costs). The streets element of the contract is circa £2.2M and the waste collection element is circa £5.7M. There are also some services which are payable by residents. In 24/25 garden waste subscriptions generated £1,184,169 and bulky waste services generated £108,138 to offset costs against the overall service price.
Legal, Statutory and Procurement	The council are legally required to provide waste collection and street cleansing services. The contract procurement process was compliant with the relevant legislation.
Crime and Disorder	The swift removal of litter and fly tipping assists in reducing the 'broken window' effect and keeps the borough clean.
Environment and Climate/Ecological Emergency	This was fully discussed throughout the contract award as it was a key priority for Members. The new fleet have electric bin lifts and are Euro VI compliant which reduces emissions. The full round re-routes for collections reduced mileage of vehicles, thus reducing vehicle emissions.
Health and Wellbeing	Adequate street cleansing reduces litter, detritus and dusts building up on roads and becoming airborne.
Safeguarding of Children, Young People and Vulnerable Adults	The re-routes have been developed to avoid busy areas like schools at the busiest times of the day. The impact of disrupted services can affect vulnerable residents more, so specific attention is paid to assisted and clinical collections.
Risk Management and Health and Safety	The delivery of the new waste service was a key risk in the Council's corporate risk register in the run up to the change. Service was unsatisfactory at the start of the contract. However, improvements were consistently made as the year went on and service ended in a much better position – which can be seen in the report.

Equality and Diversity	The service provides for every resident in the borough. Additional measures have been implemented to ensure all residents have access to the waste collection service. For example, residents can request ' <i>assisted collections</i> ' if they are unable to put bins out themselves. The contractor also collects clinical waste and sharps from residents on prescribed medication.
Privacy and Data Protection	None.

7 Appendices

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

Appendix I: Swale Annual Performance Report for the Waste Collection & Street Cleansing Service 2024/25

Appendix II: Suez Mid Kent Annual Report

8 Background Papers

The full waste scrutiny report by the cross party member group can be found here <https://news.swale.gov.uk/news/waste-scrutiny-review#:~:text=The%20review%20worked%20to%20identify,responses%20to%20the%20public%20survey>.

Annual Performance Report for the Waste Collection & Street Cleansing Service

2024/25



Comment from Chair of Environmental Services and Climate Change Committee

The aim of this report is to summarise the waste collection and street cleansing service and provide details of performance for the first year of the new contract and related activities undertaken by Council teams.

Reporting is an important part of our accountability. The transparency given by regular and consistent reporting should help Council Members and the public gain a better understanding of the overall service.

The service has many different parts and is complicated. Reviews and monitoring provide the Council with management information for performance evaluation and help to identify where improvements are needed. In addition, it also provides a framework for performance comparisons between other local authorities. This report will complement the Suez (our main contractor) annual report and also the waste scrutiny review undertaken by Members in 2024/25 and published in January 2025.

I hope that you will find the contents of this report helpful and informative.

Cllr Dolley Wooster – Chair of Committee

Abbreviations

DRS –	Deposit Return Scheme
KRP –	Kent Resource Partnership (a collaboration of local Kent local authorities)
MKWP –	Mid Kent Waste Partnership
POPs -	Persistent Organic Pollutants
RIDDOR –	The Reporting of Injuries, Diseases, and Dangerous Occurrences regulations.
WCA –	Waste Collection Authority (Swale Borough Council)
WDA –	Waste Disposal Authority (Kent County Council)
WUDS -	Waste Upholstered Domestic Seating

Introduction

This is the first of a new cycle of annual performance reports to be presented at Swale Environment Committee. The reporting cycle will include two reports each year. One will be an annual update on the previous full year's performance. This will be reported to Environmental Services and Climate Change Committee at a suitable time soon after Suez submit their annual report at the end of April each year. The second report will be a '*lighter touch*', mid-year update, which will be presented towards the end of each calendar year.

As this is the first of these reports under the new service, some data comparisons with the previous service provider become less relevant as new ways of working have been introduced. However, other data sets still remain very relevant. A large quantity of data has been provided to stimulate discussion with Members to determine which parameters will be key for measuring current and future performance.

Swale Borough Council are part of the Mid Kent Waste Partnership along with Ashford BC and Maidstone BC. The contract includes waste collection for all three authorities and for street cleansing in Swale and Ashford. The contract lasts for 8 years from March 2024.

As the 'Waste Collection Authority' (WCA), Swale Council are responsible for collecting 'waste' and taking it to the specified locations as stipulated by the Waste Disposal Authority (WDA). Kent County Council (KCC) are the WDA. Although we often refer to the items that residents put out as 'waste', it is fundamental that we stop *thinking* of many of the materials that we collect as 'waste'. Many of these items are valuable commodities that can remain for many years within the circular economy if re-used or if collected and recycled appropriately.

The main service delivery specifications include the collection of all domestic refuse streams in Swale including recycling, refuse, food, garden, clinical and bulky items. It is also a requirement to keep the borough at a suitable level of cleanliness. This includes street cleansing as required and emptying all of the litter bins and ensuring that they do not become overfull.

The contract and supporting activities are overseen by the Environmental Services team at the Council. This can be broken down into two teams – Contract & Resources and Environmental Response.

Please note that this report will focus on street cleansing and refuse collection performance. It will not review the end destinations for materials collected.

The Contract in Numbers

Waste collection in Swale for 2024/25

Collections	Over 140,000 scheduled collections every week
Households serviced each week in Swale	66,810
Number of collection operatives and drivers in Swale	79 (31 drivers and 48 loaders)
Number of SBC owned vehicles for waste collection in Swale	28 (some additional vehicles are on hire)
Tonnes of dry recycling collected and recycled in 24/25	8,394 (9,962 tonnes collected in total).
Tonnes of residual refuse collected in 24/25	34,859
Tonnes of compostable (food & garden) in 24/25	9,190 tonnes (2,663 = food; 6,527 = garden)
No of residents on assisted collections in 24/25	1220
Total bulky collections undertaken in 2025	3183
Garden subscribers at end of 24/25	Circa 20,700 subscribers
Number of ad hoc clinical collections in 24/25	7010
% of staff for Suez that live locally	Approx 85% of staff live locally (within Swale borough)
Estimated recycling rate (tbc later in year)	35% (latest figures suggest the national average in England is 42%)

Street Cleansing

Number of litter and dog bins in Swale which are serviced by Suez	1209 (plus approx. 120 litter bins on the beach fronts which are serviced by local teams)
Length of roads in Swale to be kept clean (including High Speed Roads)	1,095,404 metres (plus over 30,000 metres of footpaths and bridleways, and 69,000 square metres of car parks).
Number of vehicles for street cleansing (with some being fully electric)	13 (including 3 mechanical sweepers)
Number of street cleansing operatives and drivers	31 (12 drivers and 19 operatives)
Fly tips removed in 2024/25	1800
Offensive graffiti items removed in 24/25	19
Streets litter arisings	2,056.5 (883 tonnes of street litter arisings and 1173 tonnes highway mechanical sweepings).

Transition to the new contract and the waste scrutiny review.

The early stages of the contract mobilisation were shaped by a complex mix of challenges, some anticipated and others less easily foreseen. A few of the challenges included:

- The requirement for an entirely new vehicle fleet with enhanced environmental performance. This was impacted by the ability of manufacturers to provide vehicles due to global influences such as the war in Ukraine.
- Provision of a depot and workshop – as the Council does not own its own depot, contractors were asked to source a suitable location during the tender. Suez did this but it needed substantial improvements works, which resulted in a temporary depot being used for 6 months whilst a more permanent solution was prepared. Suez invested in the new depot with improvements such as re-surfacing the yard, new offices and a refurbished vehicle repair workshop.
- An entire re-route of waste collections in order to deliver the efficiencies required to meet environmental and financial objectives.
- The re-deployment and re-training of staff from the previous contractor to the current service provider without a break in service delivery.
- The provision of new software and hardware.
- Limited waste disposal infrastructure resulted in food waste needing to be tipped at a different site to refuse and recycling.
- Recruitment pressures, higher-than-anticipated staff turnover, and sickness.
- Uncertainties regarding the future of waste collections due to the most significant legislative changes for a generation that had been announced as part of the new waste strategy [now known as *'Simpler Recycling'*].

Although disruption was to be expected due to the scale of changes that were being implemented, the unsatisfactory service lasted longer than expected. Consequently, public apologies were made to residents from the council and Suez. A cross-party member working group carried out a full scrutiny review on the contract mobilisation.

From the start of the contract and throughout the review period, council staff worked on solutions with Suez and developed a recovery plan. Service performance steadily improved. By October 2024 Suez reported to be consistently achieving 99 percent or higher for collections. The Member review worked to identify the root causes of the problems and identified lessons to be learnt.

The Member group carried out a range of workshops and interviews with staff from both the council and Suez, and reviewed feedback from more than 2,000 responses to the public survey. This work led to 23 recommendations from the group, which were discussed and agreed by the Environment and Climate Change Committee at a meeting on Wednesday 15 January.

The council will continue working with Suez to bring about the additional benefits of the new contract.

The full waste scrutiny report can be found here

<https://news.swale.gov.uk/news/waste-scrutiny-review#:~:text=The%20review%20worked%20to%20identify,responses%20to%20the%20public%20survey.>

Due to the disruption across collections, the paid for garden waste service was reviewed by the Member Waste working group. In consultation with this group and to recognise the impact the disruption made, all residents who reported two or more missed collections during the period 23 March to 31st October 2025 had their subscriptions manually extended for the exact number of reports they made (ranging from 2 to 7 reported missed collections). We also automatically extended a number of customers when they called us via the call centre during the disruption. The impact of the disruption of last year will be monitored through the amount of re-subscriptions in 25/26.

As part of the new service, a decision was taken for Mid Kent partners to procure their own fleet for waste collection and street cleansing. The cost of procuring the Swale fleet was over £7M. This was a decision made by members prior to contract award as it would enhance resilience and future flexibility as well as reduce finance costs for the council. All fleet vehicles are fitted with in cab technology, CCTV and trackers. This enables better monitoring of performance and investigations.

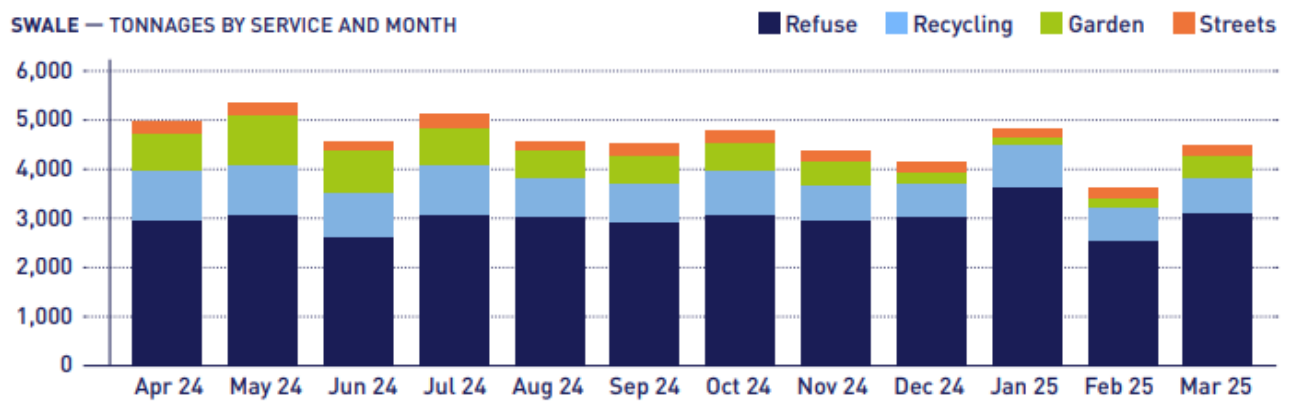
Performance

Collections

The start of the new service commenced with a smooth TUPE transfer of staff from the previous contractor. However, it was quickly established that the new collection rounds were not as efficient or as balanced as they should be. Consequently, several further adjustments and day changes were required to ensure the rounds were efficient and effective. Suez took this opportunity to adjust their delivery model to balance recycling and refuse services, effectively 'mirroring' collections for different streams on alternative weeks. This required the deployment of another round of recycling collections for the two streams to balance. The changes were implemented in stages, with each stage delivering better results. Consequently, the collections towards the end of the year were far improved. The most recent adjustment took place in March 2025 and it was focussed around the communal properties.

Despite the early disruptions, officers commented that the Christmas collections were some of the smoothest in recent years.

Figure 1.1 – tonnages collected in Swale



Collection performance in 24/25 has been steadily improving as the year progressed. Further controls and mechanisms continue to be implemented to drive performance improvements.

Figure 1.2 - Refuse – total reported missed bins



Figure 1.3 - Food – total reported missed bins

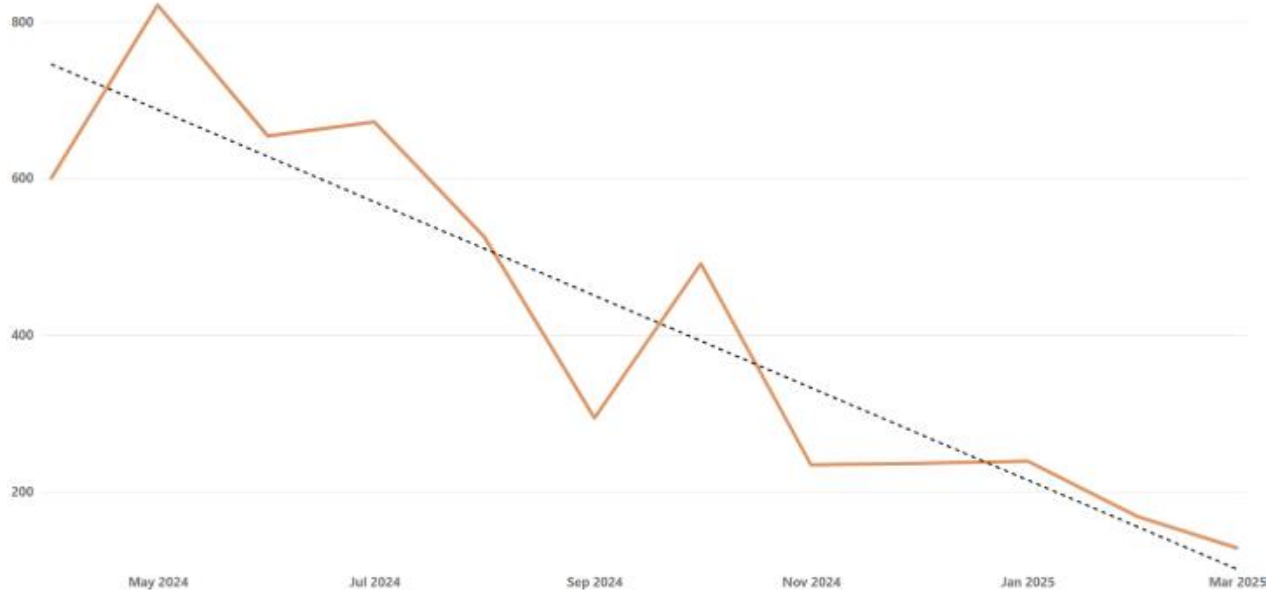


Figure 1.4 - Recycling – total reported missed bins

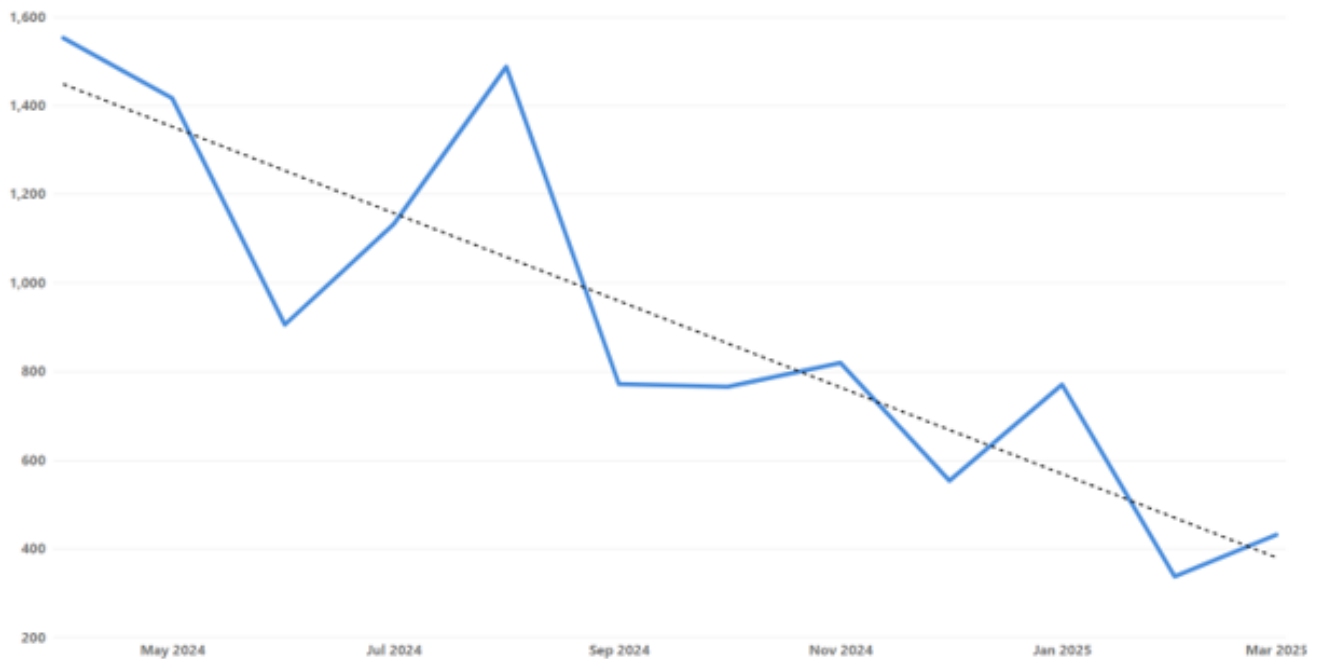


Figure 1.5 - Garden – total reported missed bins

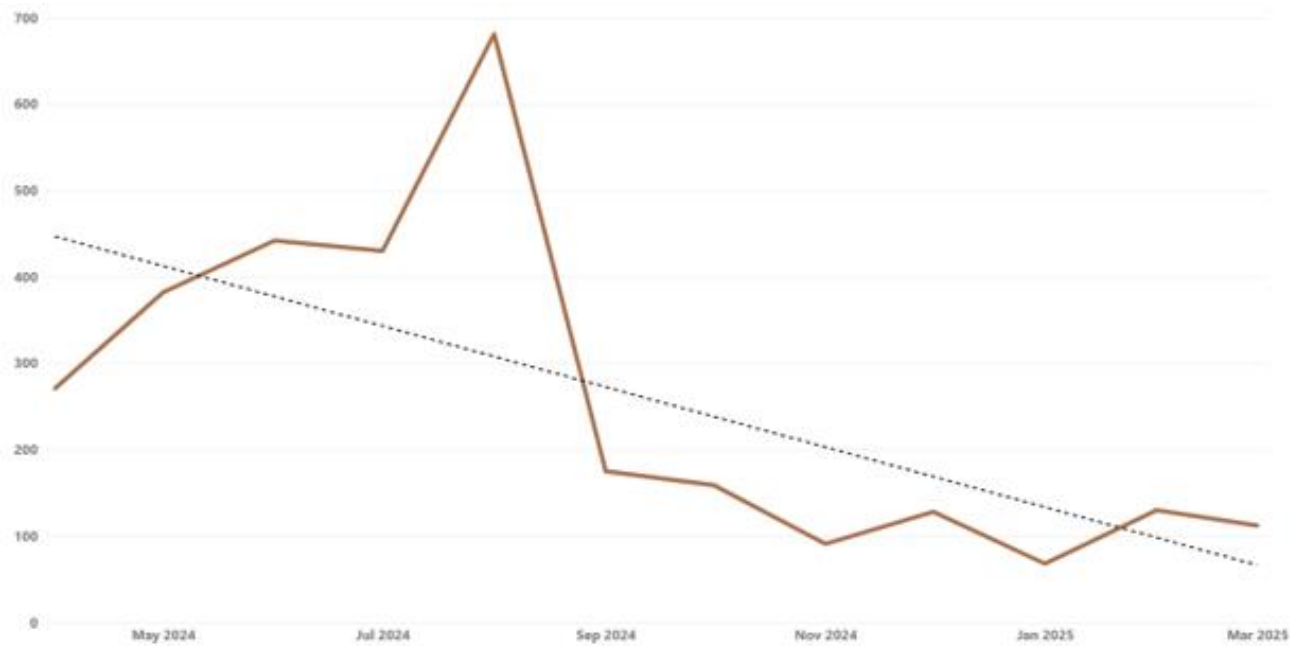
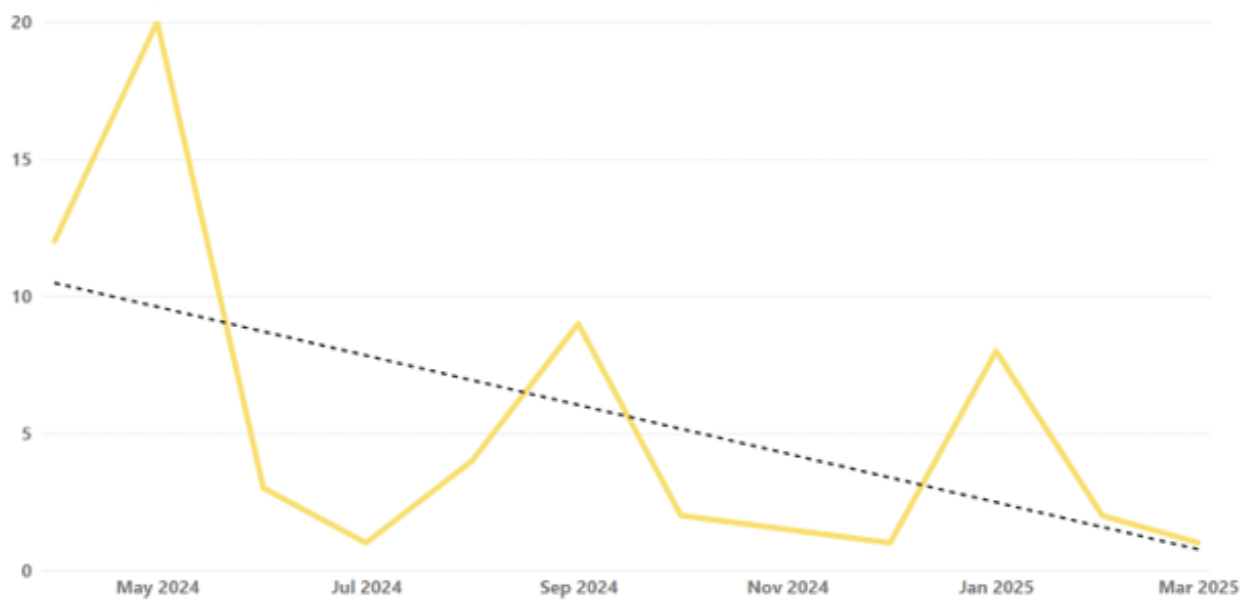


Figure 1.6 - Clinical – total reported missed bins



N.B - Figures 1.2 – 1.6 include all reports made to the council of bins being missed. This includes unjustified missed bins which may later be cancelled.

Figure 1.7 – Number of properties with 3 reported missed collections (all waste streams)

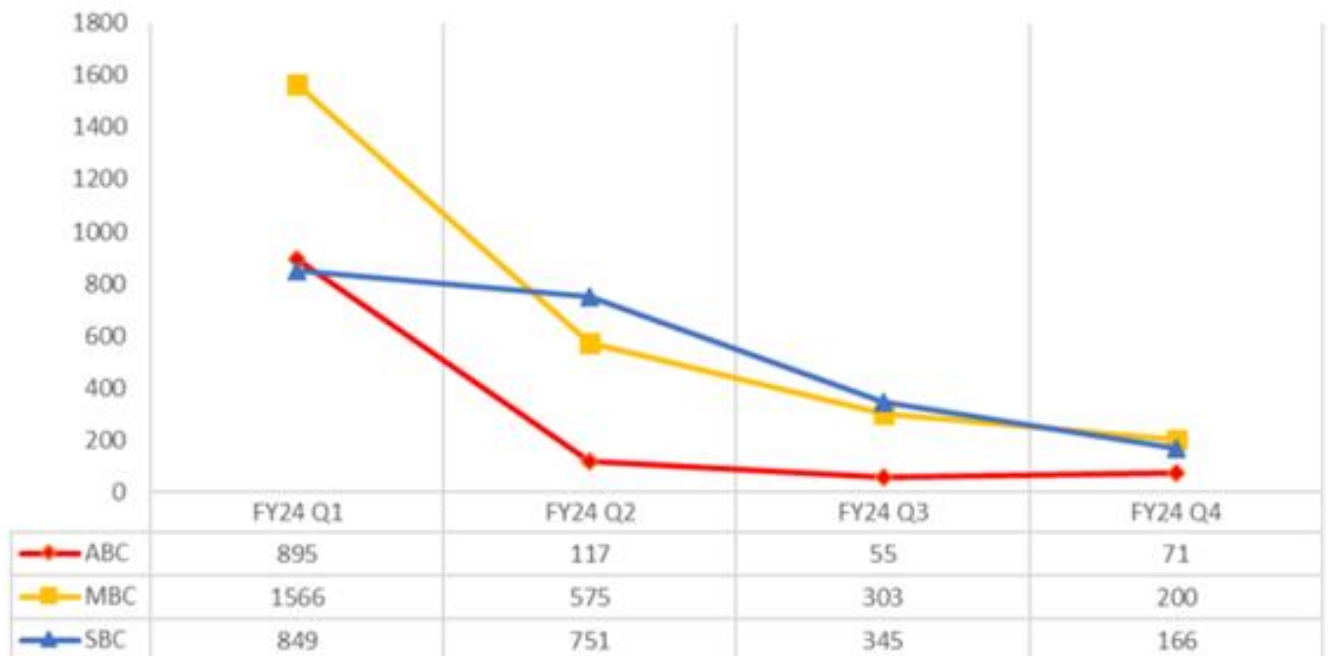
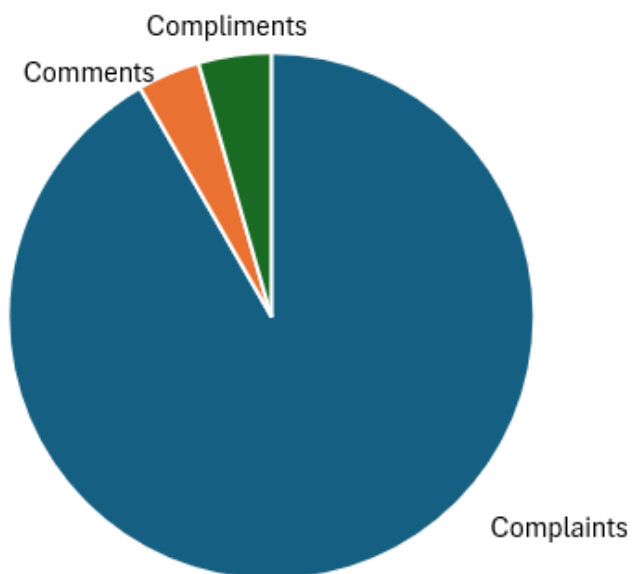


Figure 1.8 – complaints, comments and compliments



NOTE: not all contact was allocated as complaints/ comments/ compliments for Qtrs 1 & 2.

Figure 1.9 - Complaints - Refuse and Food

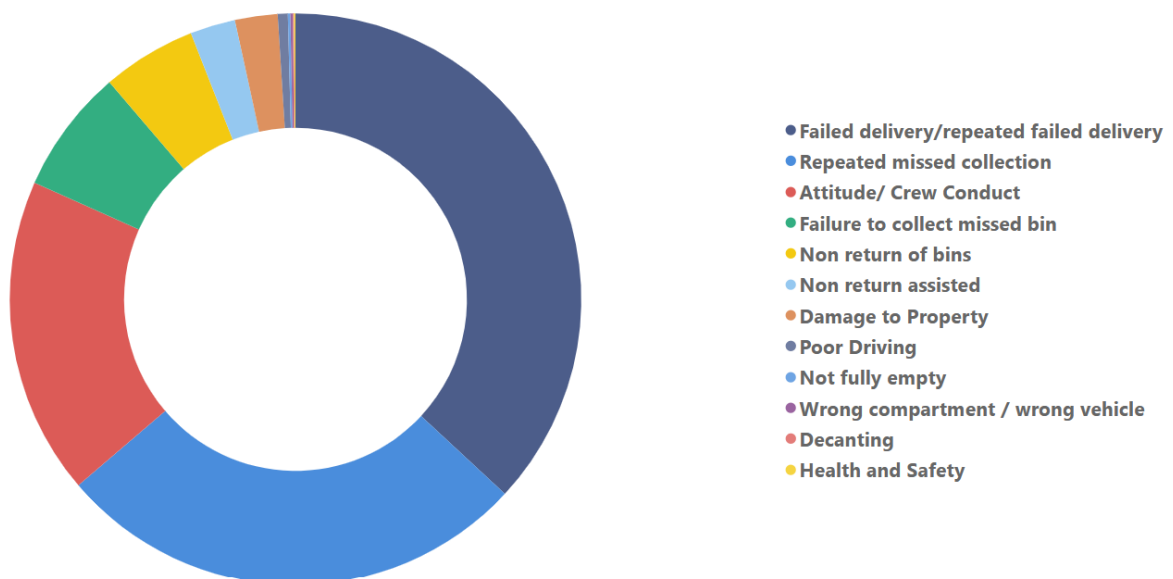


Figure 1.10 - Complaints - Recycling

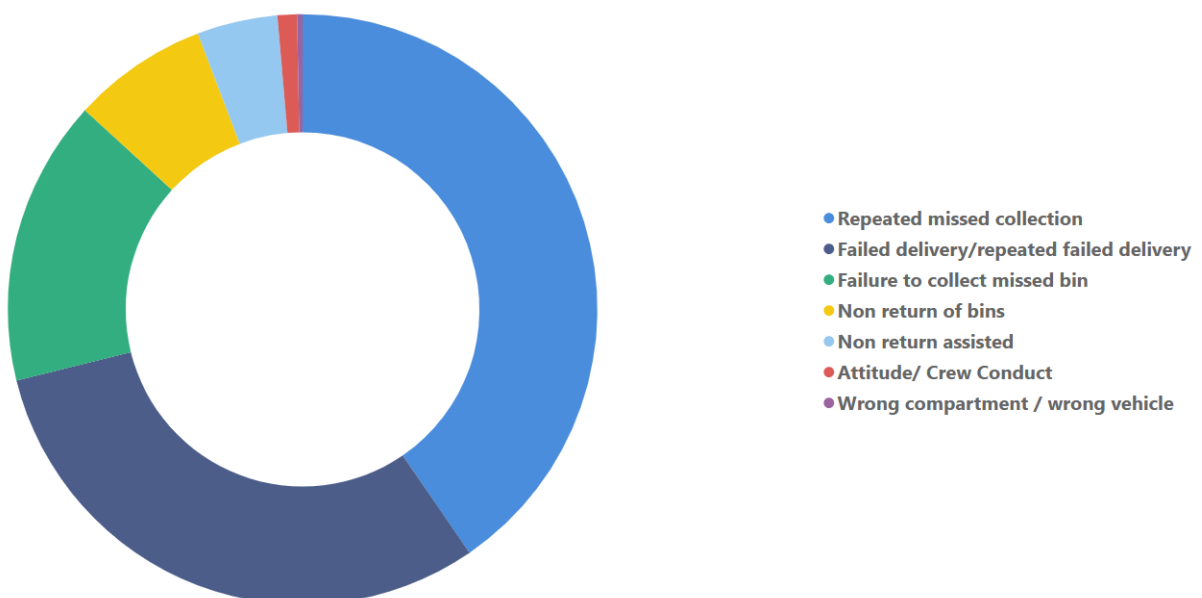


Figure 1.11 - Contamination in recycling bins

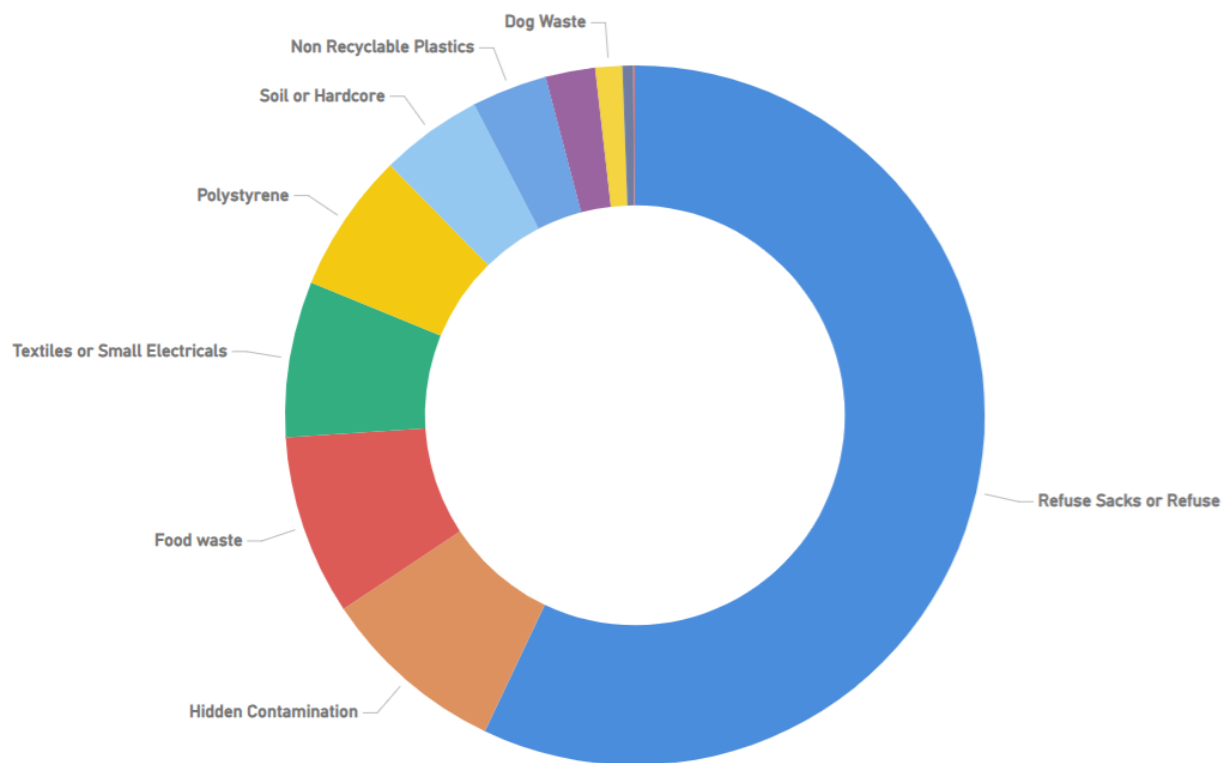


Figure 1.12 - This heat map is created from data inputted by the crews. It shows where bins have been 'locked out' for contamination. The data will become more reliable as more crews lock contaminated bins out on their handheld devices (all crews are expected to take a photograph to show the contaminants).

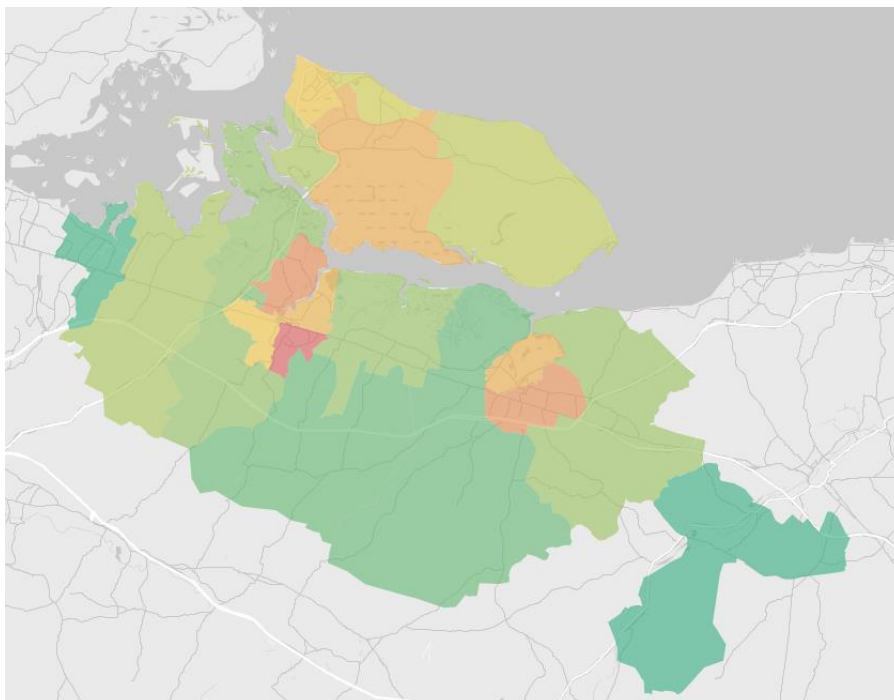


Figure 1.13 – table to show recycling lost to contamination in 2024/25

Number of lorry loads rejected at the waste transfer station for contamination in the recycling	723
Tonnes of recycling rejected for contamination	1,592

Figure 1.14 – the contaminants that caused the rejected loads at the waste transfer station



Sampling of recycling at the recycling plant has identified elevated levels of objectionable and prohibited materials in Swale recycling bins. Consequently, over the past two years this has resulted in an increase of whole loads being rejected at the waste transfer station in Swale. A range of measures and projects are being implemented to combat contamination such as better public awareness through social media campaigns and more thorough checks for contaminants at the point of collection. Recycling bins with contaminants will have a hanger placed on them and the bin will not be accepted until the contaminants have been removed by the resident.

Bulky items - Legislation came into force in 2024 that required certain waste upholstered domestic seating (WUDS) to be collected, transported and disposed off in a different way (and at a different location) to the other bulky items that are collected. This was due to these items containing persistent organic pollutants (POPs) which are used in manufacturing, often as a fire retardant. A partnership

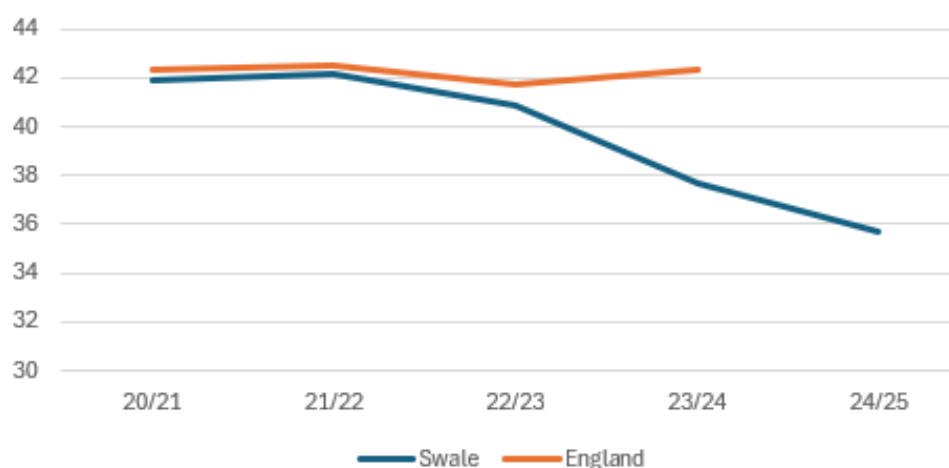
approach across the service resulted in this new requirement being implemented on time and with little impact on customers.

Figure 1.15 - Top 10 Bulky Items Collected

Number of Items requested (Completed Events Only)	
Type of Item	Swale
MATTRESS (SINGLE/DOUBLE/KING)	1344
SETTEE (2 SEATER)	869
SETTEE (3 SEATER)	737
CHAIR (ARM/RECLINER)	713
BED BASE (CAMP/SOFA/Z/FUTON)	638
FRIDGE/FREEZER	331
CHAIR (DECK/GARDEN/SWIVEL/OFFICE)	225
CHAIR (DINING)	172
SETTEE (4 SEATER)	169
FREEZER	162

Recycling – Recycling figures across the UK have plateaued in recent years which is why new legislative measures have been introduced to enhance performance and create consistency in services. The raft of new legislative measures are now commonly known as ‘Simpler Recycling’. The measures are intended to drive the UK towards targets of 60% by 2030 (by weight) and 65% by 2035. The graph below shows a recent reduction in Swale’s recycling rate. The increase in rejected recycling loads will be a contributing factor to this trend. Tackling contamination must be a main priority for Cllrs and officers in the year ahead.

Figure 1.16 – Swale and England’s recycling rates



Note 1 – Swale data for 24/25 up until Feb 2025 only

Note 2 - The official England waste from households recycling rate was 42% in 2023/24.

Street Cleansing

Over the past year officers have focussed their efforts to ensure waste collections operated successfully. With waste collections routinely completing, the focus has now moved to street cleansing. Work has started to check data sets and integrate street cleansing operations into CORE (Suez's software system), allowing for improved scheduling, visibility, and performance monitoring across the service. Consequently, there will be more data available as 2025 unfolds.



One of the early operational improvements for street cleansing was the introduction of electric vehicles into the fleet.



It is also fair to note that Suez delivered a strong leaf clearing season with few complaints received.

Fly tipping

In 2024/25, Swale BC reported 2615 fly tipping incidents. Swale Council proactively applied for and received grant funding from DEFRA to tackle behaviour change and

reduce fly tipping in the borough. The project included the purchase of three cameras which were deployed at fly tipping hot spots. It also included campaigns on local billboards and social media. The DEFRA grant funded Swale BC contributions to the police for 'Operation Assist' for 2024/25. This is a visible partnership where officers are tasked alongside the police to target illegal waste carriers and the prevention of fly tipping. These operations will continue into 25/26 on a bi-monthly basis.

In addition to this, officers also participated in multi-agency activities such as road stops with The Environment Agency and the DVSA. Through the Kent Resource Partnership, information, intelligence and ideas are shared to tackle illegal waste crime.

Swale Borough Council hosted the East Kent Regional waste crime practitioners meeting in Feb 2025.

There were 21 Fixed Penalty Notices (FPN's) issued for waste related crime such as fly tipping or duty of care offences.

Figure 2.1 - Fly tipping - waste type

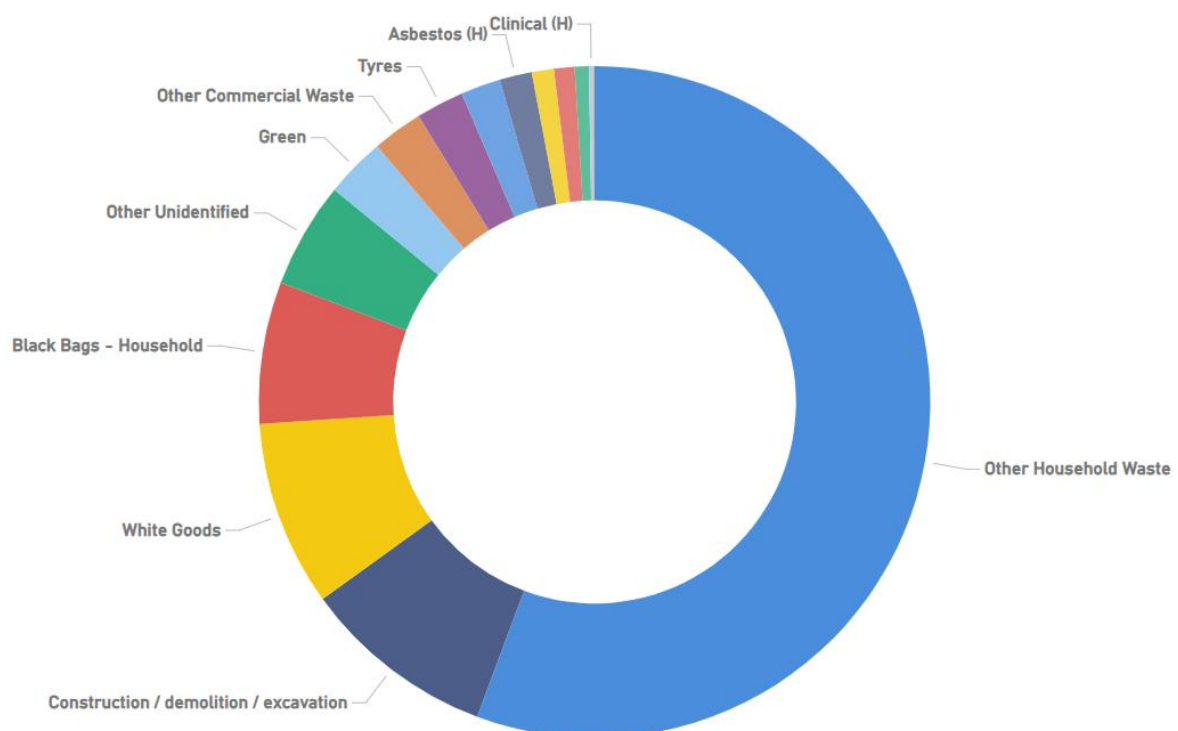


Figure 2.2 – fly tipping - Land Type

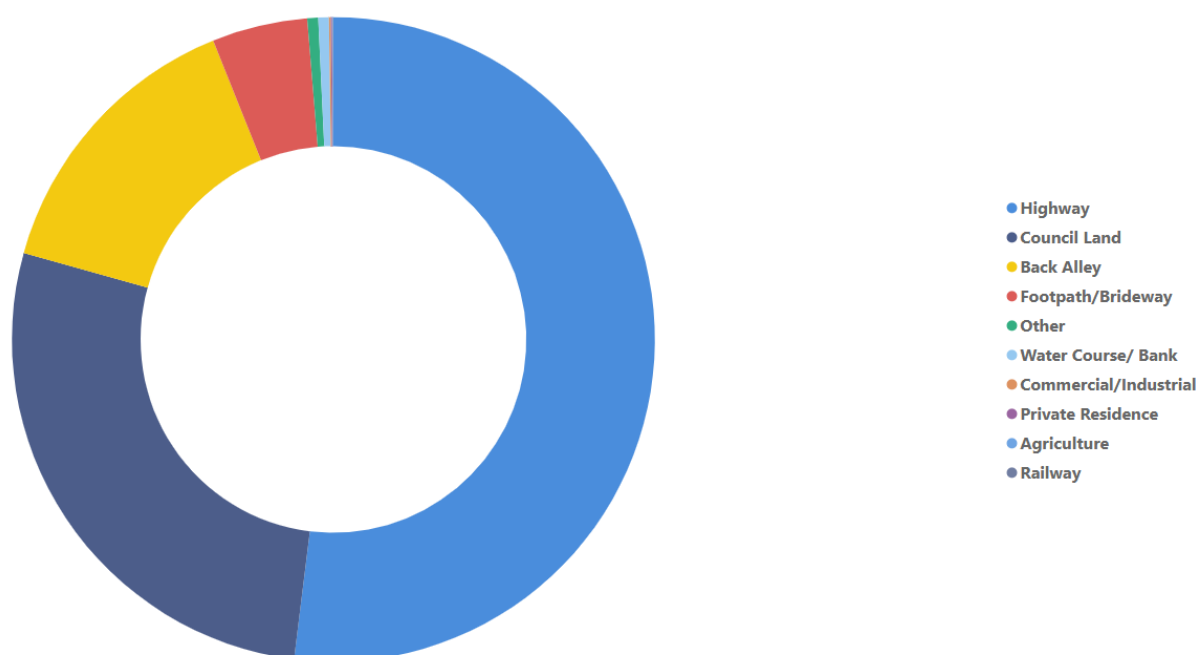


Figure 2.3 - Fly Tipping- load size

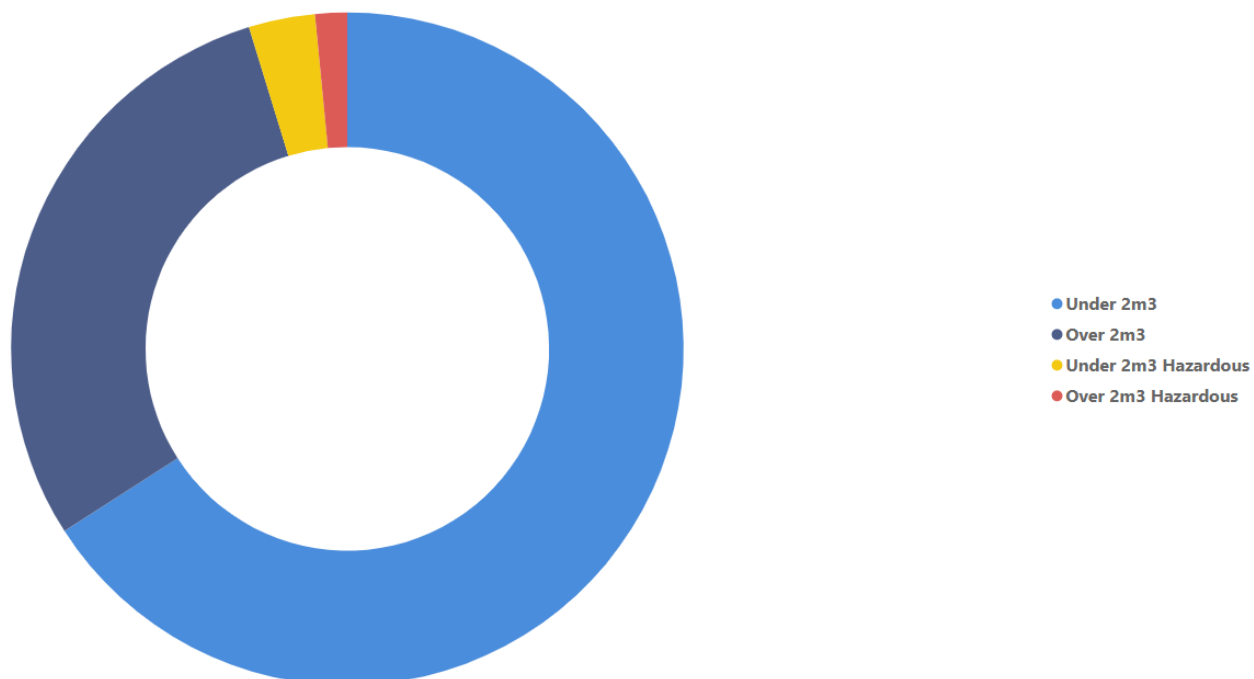
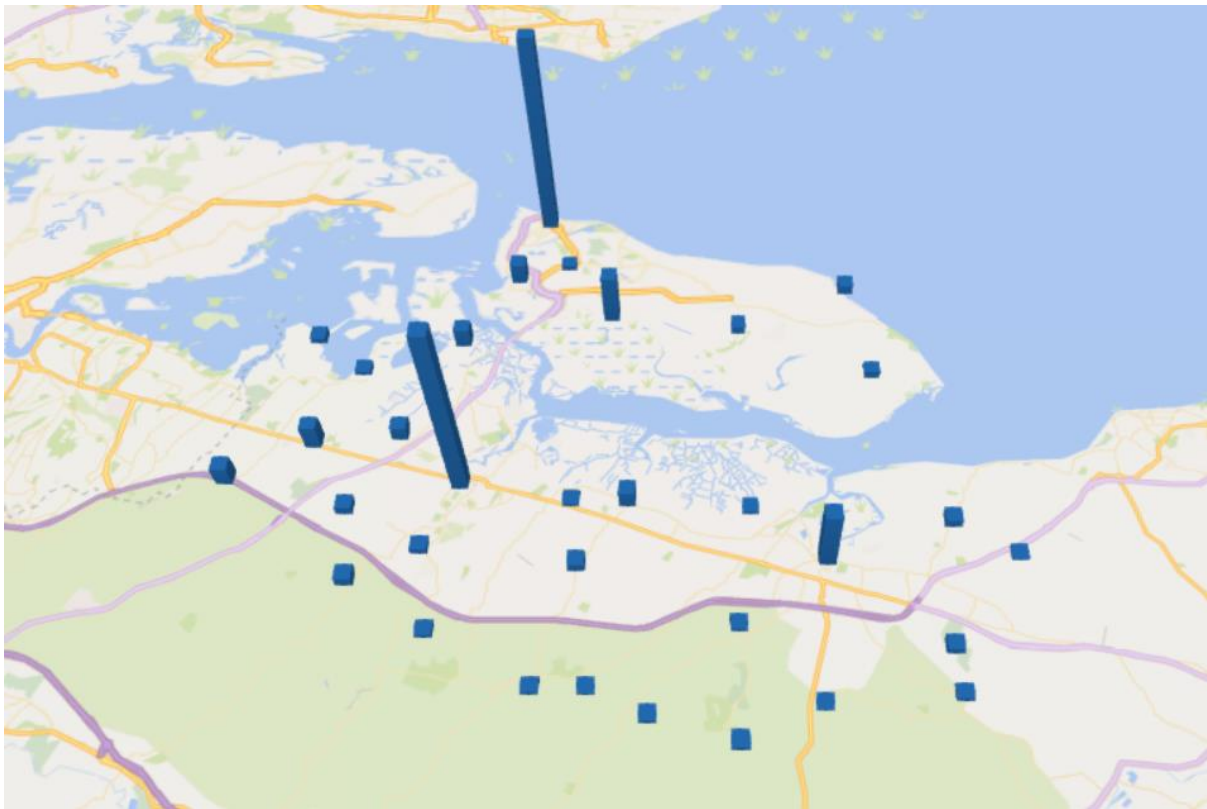


Figure 2.4 – Fly tipping across Swale



Litter and graffiti

In 2024/25, 566 Fixed Penalty Notices (FPNs) were issued for litter offences.

Figure 2.5 - Number of reported overflowing Litter Bins

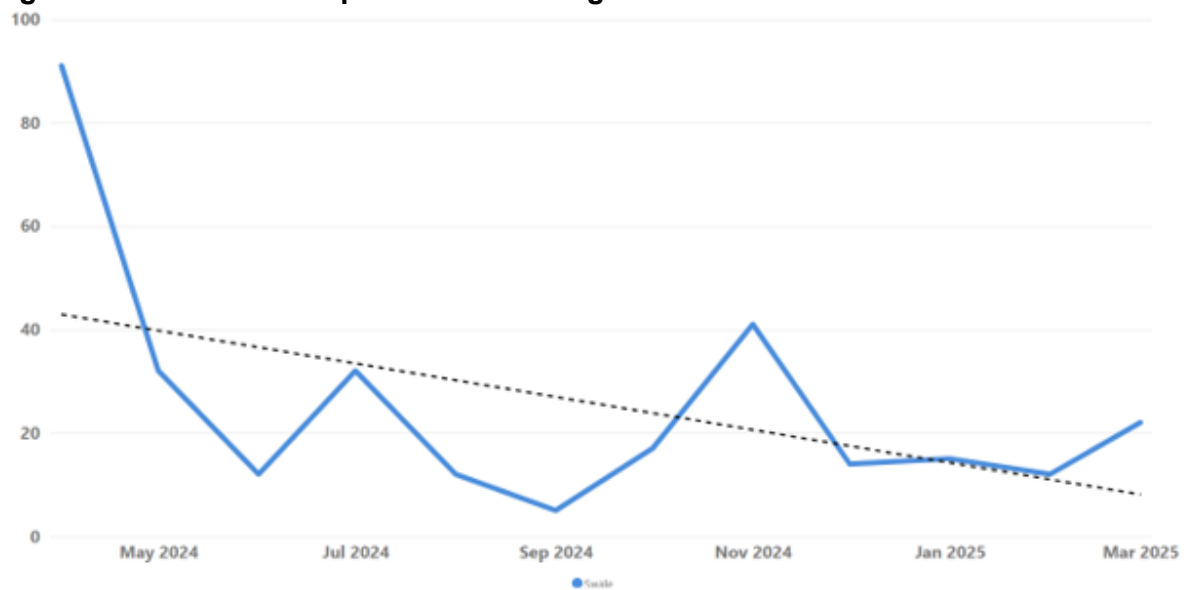


Figure 2.6 - Graffiti items removed

Number of non offensive graffiti reports	18
Number of offensive graffiti reports	19

Figure 2.7 – Dead animals reported in public areas

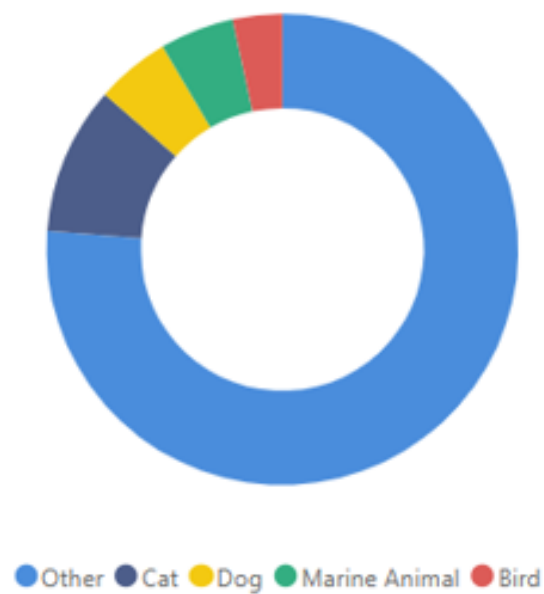
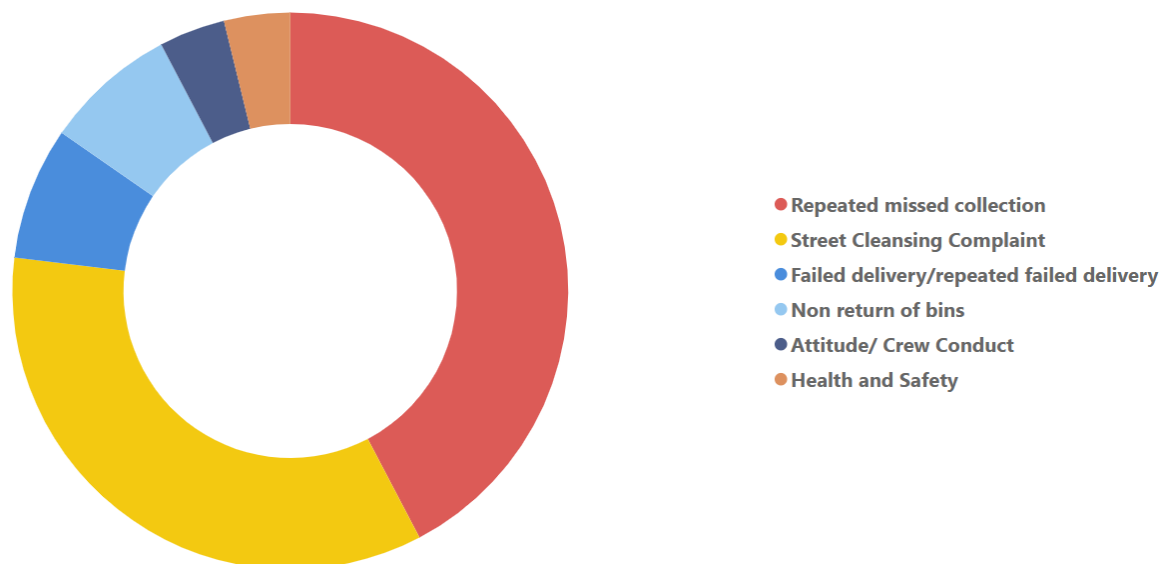


Figure 2.8 - Complaints received in 24/25 for street cleansing (27 complaints received overall)



Health and safety

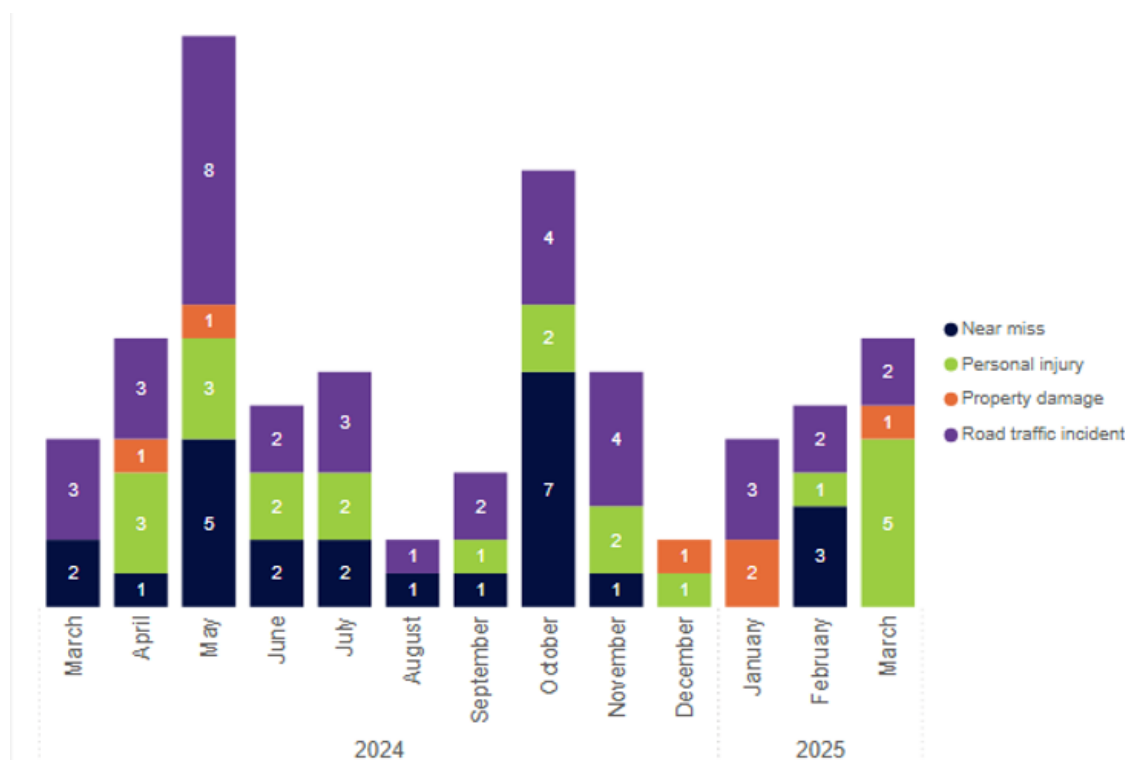
Health and Safety Executive (HSE) figures suggest that across the waste industry there are an estimated 5,000 workers suffering from work-related ill health (new or long-standing). 4.2% of workers in the sector suffer from work-related ill health (new or long standing) [source - Labour Force Survey (LFS) average estimate over 2015/16 / 2023/24].

For the Mid Kent waste partnership in 2024/25, Suez reported no RIDDOR reportable incidents (Reporting of Injuries, Diseases and Dangerous Occurrences Regulation). RIDDOR data suggests that across the waste sector there were 1,492 non fatal injuries to employees reported by employers under RIDDOR in 2023/24. According to RIDDOR data, slips, trips and falls accounted for between 35% and 52% of non-fatal work related specified injuries (across private and public sectors working in waste) in 2024.

Although there were no RIDDOR reportable incidents in Mid Kent, Suez reported eight lost time accidents across all three boroughs and 36 personal injuries in this first Contract Year. The waste sector is a 'selected manual type' industry. These industries generally have a higher rate of work-related ill health or workplace injuries compared to all other industries.

Suez teams have proactively reported and engaged with health and safety across all boroughs in Mid Kent, with 152 near misses recorded in Year 1. In addition, Suez facilitated 602 'Safety in Mind' conversations between crews and supervisory teams, reinforcing positive behaviours, identifying areas for improvement, and embedding safety into daily routines.

Figure 2.9 – Suez Health and Safety incidents in Swale 2024/25



Suez advise that they continue to drive down incidents through improved processes, close supervision and a visible leadership presence.



Environmental benefits/ healthier communities

All refuse vehicles are Euro VI standard and have been fitted with electric bin lifts to reduce fuel consumption. Vehicles are fitted with software that enables Suez to track driver efficiencies such as unnecessary idling and heavy braking. Although the re-routes caused problems initially, in the longer term the more efficient rounds will reduce mileage and emissions. Around 15% of street cleansing vehicles are electric.

As part of the depot infrastructure improvements, sensor lighting was installed in site cabins to minimise unnecessary energy use, and LED lighting was introduced across all workshops to lower energy consumption. Sustainability Champions were appointed at each site to lead best practices and engage colleagues in continuous environmental improvement.

In Mid-Kent, Suez are focusing on re-use practices both internally and externally. Internally, all staff received reusable water bottles during their inductions at the start of the contract in March. Internal best practice will also be consolidated with a PPE reuse initiative.

Alongside this, externally, Suez continue to explore their relationship with local charities to focus on reusing bulky waste. There will also be a focus on working with Repair Cafés and WEEE initiatives throughout Contract Year 2.

Suez operate a 'Day a Year to Volunteer' scheme. Every employee is given a paid day to support a cause close to their heart. This year Suez staff have

- volunteered at Demelza's Larkfield distribution centre and ran a schools competition for designing a storage container to reuse bulky waste.

- Hosted bake sales at each Mid Kent site to raise funds for the British Heart Foundation.
- Welcomed KMTV to join the street cleansing team in Swale, offering an inside look at the work that keeps the partnership boroughs clean.

Suez welcomed two new apprentices this year, with plans to hire 6 more over the course of Contract Year 2.

Contract costs for Swale in 24/25

Waste collection (all streams including garden)	£5.77M
Street cleansing	£2.23M
Income from service charges	£1.18M income from garden services and £0.1M from bulky waste collections

Looking ahead for 25/26

- Street Cleansing - a key priority is the full integration of street cleansing rounds into CORE to enable real-time data and reporting capabilities. This will include the implementation of summer working plans to optimise resources during warmer months. It will also mean we can share better data with Cllrs and residents and react quicker to issues.
- Food collections – under the government legislation changes, every domestic property must be offered a food waste collection service by March 2026. This will go hand in hand with food waste promotion projects in partnership with stakeholders. There will be a focus on providing this service to communal properties and those not on the wheeled bin scheme.
- Reduce contamination – tackle contamination in recycling bins and ensure as much recycling as possible gets placed in the recycling bins rather than the refuse bins. Work with stakeholders such as KCC and KRP to understand the issue and deliver campaigns to improve performance.
- Reduce residual waste tonnages – work with KCC and KRP to support 2025 waste composition surveys for residual and food bins in Swale and throughout Kent. Understanding composition will assist campaigns to reduce residual waste tonnages (green bins).
- Implement the requirements of Simpler Recycling – Ensure measures are taken to become an ‘efficient and effective’ organisation. Prepare for new burdens such as collecting and recycling plastic films by 2027. Plan for the new deposit return schemes (DRS) for plastic bottles and cans in England by October 2027.

- Social value – there are some exciting initiatives being developed across areas of repair and re-use. Opportunities are also being explored for more apprenticeships within the service and the creation of job skill sessions in Swale to help young people transition into meaningful employment.

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**Proudly serving
communities in Ashford,
Maidstone and Swale**

Mid Kent annual report

March 2024 to March 2025 (contract year 1)



in partnership with
Page 33



Foreword

This report marks the end of the first year of our eight-year contract with the Mid Kent Waste Partnership, serving the communities of Ashford, Maidstone, and Swale. It reflects on the journey so far, celebrates key achievements, and sets out our vision for continued improvement and progress.

Mobilising a contract of this scale, which spans three boroughs, serves over 200,000 households, and involved more than 80,000 bin collection day changes, was always going to be a significant undertaking. The early stages of the mobilisation were shaped by a complex mix of challenges, some anticipated and others less easily foreseen. We had prepared for key operational shifts, which we expected would take time to bed in, such as the rollout of new collection routes, the introduction of a fleet of 83 vehicles, and the integration of in-cab technology. However, additional pressures such as sickness and the late delivery of our new vehicles, compounded the initial disruption, particularly in Maidstone and Swale.

In these two boroughs, issues extended beyond the disruption typically expected during mobilisation, and we sincerely apologise for any disruption that residents experienced during the transition. Nevertheless, throughout we remained firmly committed to achieving the contract's service standards and continued to refine routes, schedules, and systems until we were confident we had the right solutions in place. We have put in place new systems to ensure a more robust and reliable service going forward. Thanks to the dedication, resilience and commitment of our teams, we have successfully transitioned and are delivering the agreed service levels across the Partnership.

Our street cleansing service has also made significant strides. The 2024 leafing season, which involved clearing large volumes of fallen leaves from roads as trees shed during autumn, was completed on time and to a high standard. The operation was marked by exemplary communication and coordination between client and contractor throughout.



At the centre of this progress is our people. More than 77 percent of our workforce live locally, and we have supported them from day one. Ahead of service commencement in March 2024, around 265 employees took part in comprehensive induction weekends focused on safe working practices, vehicle operation and the use of new digital tools. Our commitment to health and safety remains paramount, with plans in place for all front-line supervisory staff across the Partnership to achieve IOSH certification. We continue to invest in training, innovation, and sustainable practices to achieve excellence in service delivery.

Looking ahead, we remain focused on making an even greater impact. This includes launching waste electrical and electronic equipment (WEEE) repair roadshows, engaging with schools on recycling, and welcoming new apprentices into our growing team. This one-year milestone is a testament to the hard work and dedication of every team member. We are proud of what has been achieved and look forward to building on this strong foundation in the year to come.

John Scanlon
CEO, SUEZ recycling and recovery UK

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Introduction

Welcome to our annual report for the Mid Kent Waste Partnership and SUEZ waste, recycling and environmental services contract.

This report is designed to give community members and stakeholders a view of how the Mid Kent Waste Partnership and SUEZ are working together to make a difference for the residents of Ashford, Maidstone and Swale.

Highlights

In the following sections, we review key highlights and milestones from the first contract year (March 24-March 25) to show how our collaboration is contributing to the Mid Kent Waste Partnership’s environmental ambitions.

New services commenced 24 March 2024

200,000+ households

Household collections, street cleansing and maintenance

68 collection teams

86 drivers and 145 loaders

77% of staff live locally

Roll out of IOSH training for all front-line supervisors – paramount to ensuring the health and safety of our workforce

From July 2024, consistent 100% on the day collections for Ashford

99% average completion across the Partnership from October 2024

37,132 tonnes of recycling

22,052 tonnes of garden waste

84,691 tonnes of refuse

5,170 tonnes of street sweepings



2,291,948m of road cleansed
2,611 street bins emptied
11,931 bulky waste collections
15,257 clinical waste collections

**New fleet of 83 RCVs +
26 vehicles for street cleansing**

**Approximately 15%
of the street cleansing fleet
is now electric**

**Comprehensive training for
around 265 members of staff**

over two weekends on safe working
procedures and how to operate the new
vehicles and in-cab technology

**Volunteering at the Repton
Connect Community Centre
and with Demelza**

**Sustainability and
biodiversity initiatives at
each of our depots**

**Welcoming two new
apprentices as part of our
ongoing commitment to creating
local employment opportunities
and nurturing talent**

Operational review

SUEZ commenced the Collection and Street Cleansing Contract on 24 March 2024. As part of the transition, we facilitated a smooth TUPE transfer of staff from the previous contractor, establishing our presence and beginning operations under the SUEZ brand.

Waste collection service

From day one, our teams were deployed with a fleet of 83 vehicles, servicing 203,780 properties each week across the three boroughs that make up the Mid Kent Partnership. Our early focus was on embedding operational stability, and initiating a cultural shift towards continuous improvement, aligned with the “SUEZ way.” This included the introduction of new technologies, upgraded facilities, and a strong emphasis on safety and service quality.

We implemented key innovations such as in-cab technology, food waste pods and electric bin lifts, modernising how our crews operate and improving both efficiency and environmental performance in line with the Partnership’s sustainability objectives. New routes were also introduced to streamline service delivery and better respond to the needs of each borough.

While this transformation was underway, a range of challenges emerged. Some were expected as part of a mobilisation of this scale, such as the time needed to adjust to new routes, vehicles and technologies. However, other factors were less predictable and more difficult to manage. Recruitment pressures, higher-than-anticipated staff turnover and sickness – particularly acute in Maidstone and Swale – added complexity to our operational efforts. These added pressures had a direct impact on initial service performance, including instances of missed collections during the early months.

Despite this, service performance steadily improved. Ashford, less affected by these additional factors, reached 100 percent completion rates by July 2024. The wider Partnership followed, consistently achieving 99 percent or higher from October onwards.



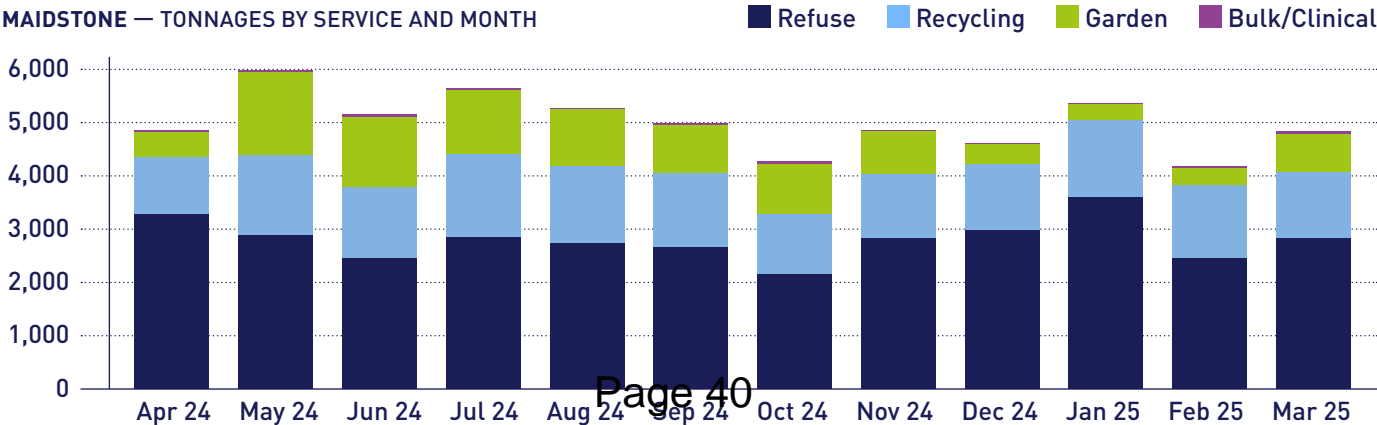
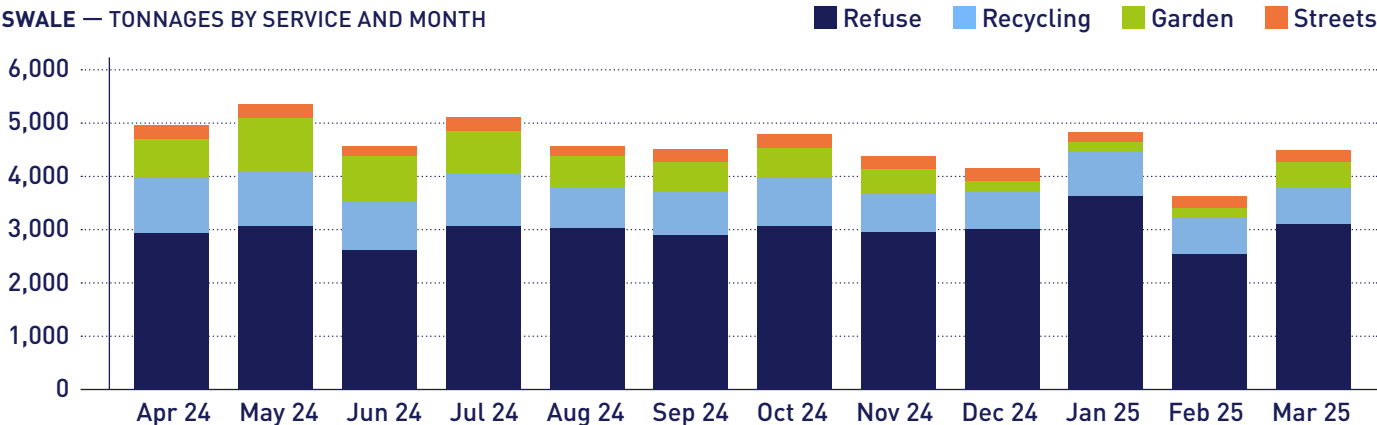
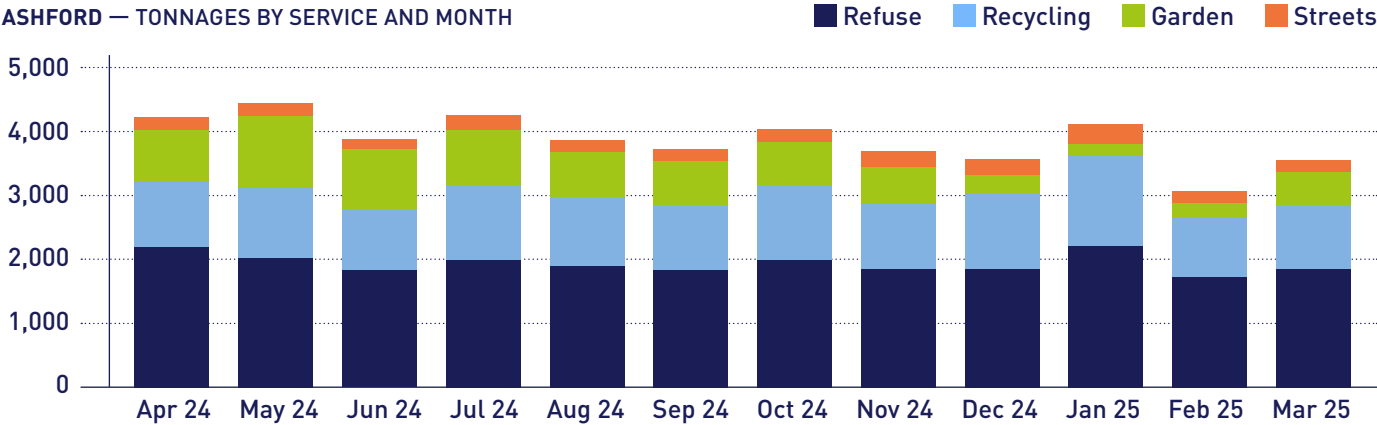
Physical infrastructure improvements were also critical in supporting our operational resilience and service quality. A new depot and enhanced workshop was established in Swale. Meanwhile, brand new facilities were created in Ashford. These upgrades created safer, cleaner and more efficient working environments, reinforcing our long-term commitment to delivering better services.

Health and safety was a key area of focus from the outset. As explored in more detail in the People section of this report, we carried out regular on-site supervisory checks, enhanced induction processes for both crews and back office staff, and embedded daily 'Safety in Mind' conversations into operational routines to promote a safety-first culture across the workforce.

During the festive holiday period, we ensured uninterrupted service through proactive planning. Early agreement of working arrangements with crews and Partnership officers, combined with improved holiday allocation, enabled us to meet increased seasonal demand without disruption. This collaborative approach reflected the effectiveness of our planning and the dedication of our teams.

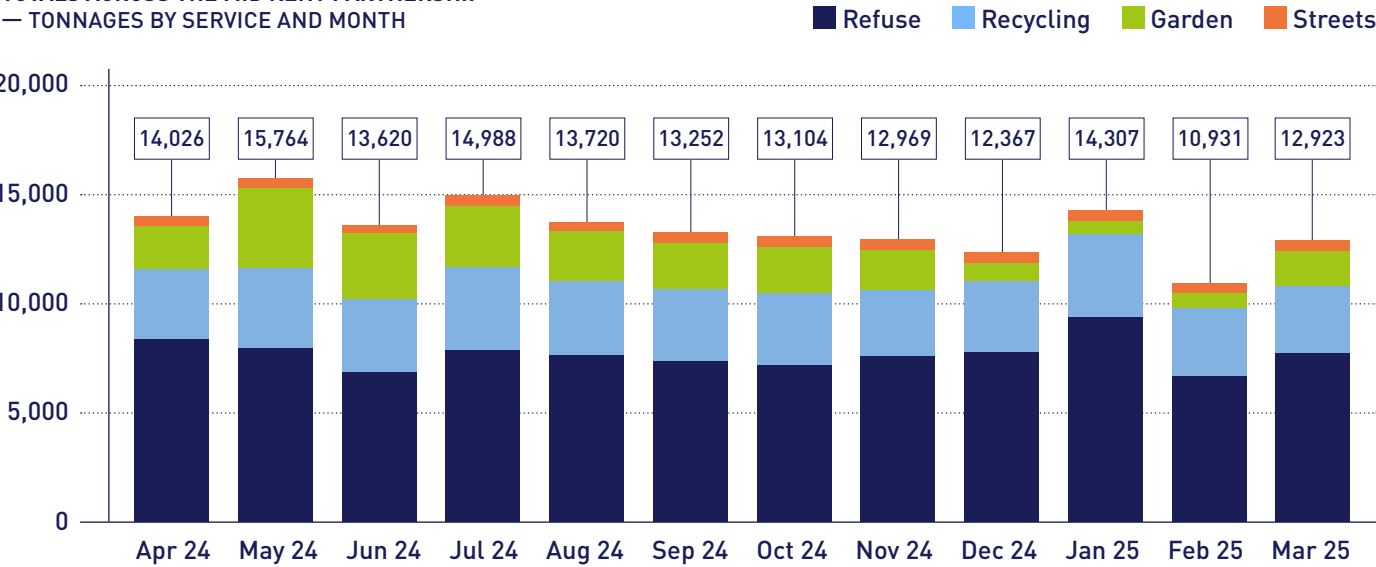
As demonstrated in the following graphs, in 2025 the service has continued to improve, with the focus shifting to maintaining operational excellence on behalf of the Partnership in contract year 2.





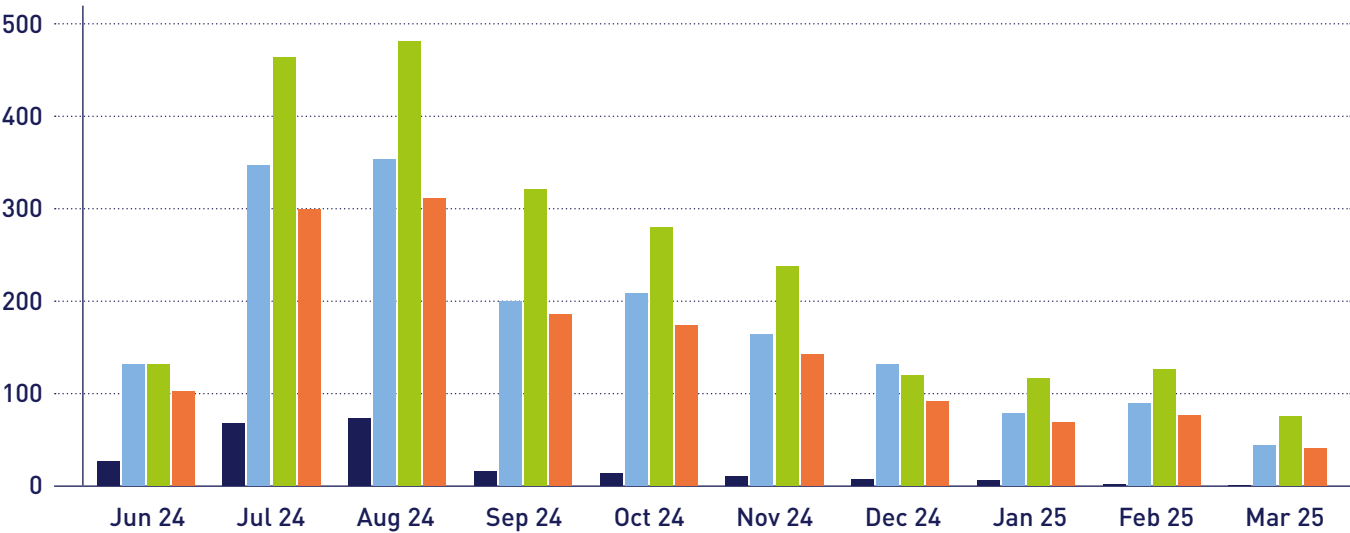


TOTALS ACROSS THE MID KENT PARTNERSHIP
— TONNAGES BY SERVICE AND MONTH



BY BOROUGH — MISSED COLLECTIONS PER 100,000

■ Ashford ■ Maidstone ■ Swale
■ Mid Kent Partnership average



*Data starts from June 2024 due to the missed collections amnesty in the first 3 months of the contract.

Street cleansing service

Throughout the mobilisation period, our street cleansing service in Ashford and Swale has focused on building a consistent and responsive operation, supported by a dedicated team of 34 crews. From the outset, the team worked to embed high standards, aligning resources across the two boroughs to ensure cleaner streets and public spaces.

One of the early operational improvements was the introduction of electric vehicles into the fleet, further supporting the Partnership's sustainability goals while maintaining the flexibility needed for daily cleansing rounds. In parallel, we started integrating our street cleansing operations into CORE, allowing for improved scheduling, visibility and performance monitoring across the service.

Year 1 highlights included strong performance during the autumn leafing season, with extensive leaf clearance completed on time across both boroughs and no rectifications issued. This was a clear testament to the effective communication between our crews and the Partnership teams. We also ended the calendar year on a high note, with no disruption over the Christmas period, demonstrating the strength of our planning and the dedication of our teams.





Looking ahead, key priorities for contract year 2 include the full integration of street cleansing rounds into CORE to enable real-time data and reporting capabilities. We are also focused on implementing summer working plans to optimise resources during warmer months, achieving 100% deployment of crews and ensuring service continuity through better holiday planning and early coordination with both our crews and the Partnership officer teams.

Our approach continues to centre on operational reliability, proactive management and close collaboration with local authorities to deliver a consistently clean and safe environment for communities across Ashford and Swale.

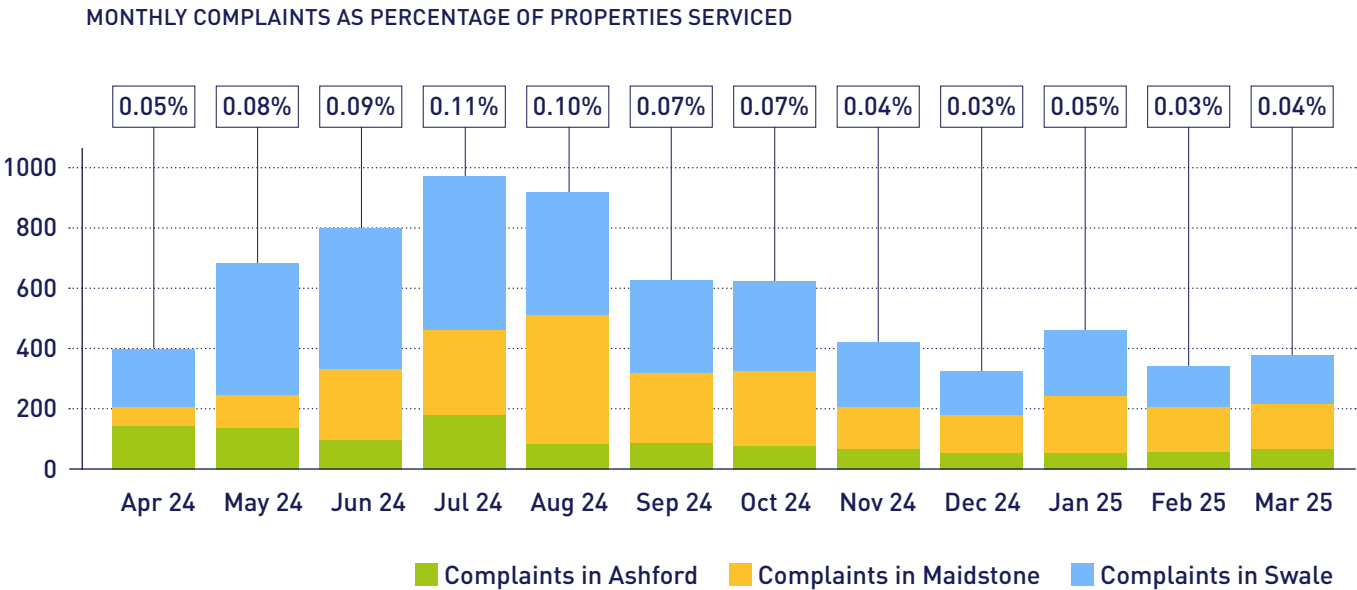
- ✓ 26 full fortnightly cycles completed for residential areas
- ✓ 2,291,948 m of road cleansed
- ✓ 2,611 litter bins emptied
- ✓ 46 graffiti items cleansed
- ✓ 2,866 fly tipped waste removed
- ✓ 65 hazardous materials removed



Customer care

Since service commencement, the majority of feedback has focused on missed waste collections. As expected with a mobilisation of this scale, the first few months presented challenges as crews adapted to new routes, vehicles and technologies. Complaint levels peaked at 0.11% of properties serviced in July 2024. However, as the service has stabilised, complaint volumes have decreased significantly, consistently remaining below 0.05% since November.

Ashford has seen consistently lower and more stable complaint levels since the start of the contract, accounting for approximately 18% of total complaints across the Partnership. In contrast, Maidstone and Swale, which experienced a greater number of missed collections due to more pronounced operational and external pressures, accounted for 40% and 42% respectively.



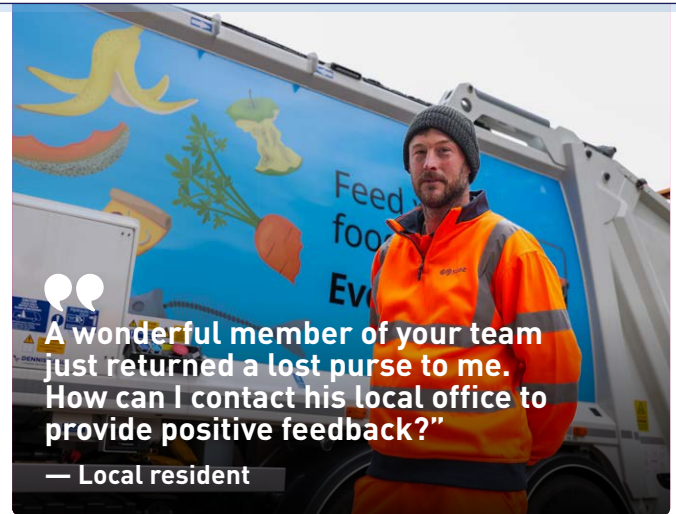


We understand the frustration this caused for residents and we sincerely apologise to those affected during the initial adjustment period. We are grateful for their patience and support. A thorough review has been conducted and valuable lessons have been learned. We are now pleased to be delivering the service levels set out in the contract and will continue to build on this foundation to maintain and improve performance across all three boroughs.

Compliments over the mobilisation period largely focused on the friendliness of the crews and their helpful nature. We are proud that our colleagues maintained a positive attitude during challenging phases of the mobilisation period and are confident that the operational improvements we are aiming for in contract year 2 will continue to reduce the number of complaints received.

One resident shared: "I know recently you have received bad press in Kent, but I would like to pass on a big thank you to the Ashford Kent team. I requested a cleanup of a bulk bin area, and it was dealt with immediately – excellent service."

Another expressed gratitude: "A wonderful member of your team just returned a lost purse to me. How can I contact his local office to provide positive feedback?"



A third resident praised an act of kindness:



If anyone knows the lovely men who do bin collection in the Woodchurch area – they noticed our dog wasn't outside to greet them today, so they kindly left him a present instead. I just wanted to share this thoughtful gesture, as it is very much appreciated (mainly by the dog!)."

People

At SUEZ, we measure the social value we create which is determined by our combined environmental, social and economic impact. This is at the core of our business, and as part of our contract with Mid Kent, we are committed to providing local employment opportunities, having a skilled and engaged workforce and supporting healthier communities.

On this contract, SUEZ employs 273 staff. The workforce is largely made up of drivers (HGV and LGV) and loaders, with 77% of staff being from the local area and all receiving as a minimum the real living wage. We have also welcomed two new apprentices, with plans to hire over six more over the course of contract year 2.





Health and Safety

Health and safety is at the heart of our culture at SUEZ. It is for everyone, anywhere, at any time. Together, we strive for a culture that is open, honest, and accountable, with continuous improvement firmly embedded in everything we do. This approach was the first key area to become entrenched during the mobilisation period and has been a consistent focus throughout the contract. We have applied our rules and standards consistently and without compromise. Our goal is simple: to ensure that every person goes home safely at the end of each day.

All front-line supervisory staff across the Mid Kent partnership will soon have achieved their IOSH qualification. This will continue to ensure that those with responsibility for health and safety fully understand workplace hazards, the associated risks and how to control them. High completion rates so far has helped ensure we have seen no RIDDOR-reportable incidents and minimised lost time accidents, with six occurring between all three boroughs in contract year 1.



Our teams have proactively reported and engaged with health and safety across all boroughs, with 122 near misses recorded in year 1, a reflection of the culture of vigilance we are working to embed. In addition, we facilitated 624 ‘Safety in Mind’ conversations between crews and supervisory teams, reinforcing positive behaviours, identifying areas for improvement and embedding safety into daily routines.

While we recorded 34 personal injuries, we continue to drive down incidents through improved processes, close supervision and a visible leadership presence. This approach has delivered a standard of performance that we consider to be industry best practice. Through consistency, training, open dialogue and accountability, we continue to raise the bar for health and safety across the Mid Kent Partnership.

	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Total
Near Miss	12	13	13	17	7	7	28	16	1	1	4	3	122
Safety In Mind Conversations	58	42	28	56	43	40	28	24	33	34	80	158	624
Vigiminute Conversations	7	18	8	29	2	7	5	15	9	0	0	1	101
Lost Time Accident	0	1	0	0	0	0	0	0	0	0	2	3	6
Road Traffic Accident	12	9	6	5	7	2	8	7	2	6	5	7	76
RIDDOR	0	0	0	0	0	0	0	0	0	0	0	0	0



Skilled and confident workforce

At SUEZ, we are committed to the wellbeing and inclusion of all our employees. It underpins all of our strategic goals and is something we embed across every level of our operations.

A critical part of the mobilisation has been ensuring that all staff received a thorough induction into SUEZ and the appropriate training to ensure their safety, wellbeing, and readiness for work. Ahead of the contract start, we hosted health, safety and wellbeing induction weekends for over 260 new colleagues. These were described by attendees as “great and rewarding,” and featured a mix of presentations and an interactive ‘info market’. Experts from across the business were on hand to demonstrate new vehicles, vehicle CCTV, tools, personal protective equipment and visual management standards.

Information on staff benefits, pensions and payroll was also provided. Meanwhile, regional GMB representatives attended to help establish a cooperative and supportive relationship from day one. As part of our commitment to an inclusive culture, all staff also received diversity and inclusion training as part of their induction.

To ensure ongoing support, we have a dedicated HR team, health and safety leads, and front-line supervisors actively engaged with the workforce every day. We have continued to support employee wellbeing through a variety of channels, including webinars on topics such as combatting stress, eating for immunity, and allyship in the workplace. These sessions are available both live and on-demand to provide flexibility for our teams. We also support our people through dedicated staff networks, including a diversity and inclusion network, a parents’ network and a veterans network, helping to foster allyship and inclusion across the business.

In November and December, we offered health screening to all colleagues, providing them with an opportunity to check in on their physical health and take proactive steps toward wellbeing. We have also received positive feedback from client-led surveys, in this area, reflecting the dedication and professionalism of our teams on the ground.

Looking ahead to contract year 2, we plan to introduce an employee of the month scheme to celebrate outstanding contributions, and are exploring opportunities to upskill our operational crews as part of our continued investment in staff development.

Healthier communities

Our support for people doesn't just focus on our SUEZ family, but also to the communities that we operate in. This forms a key part of how we measure our social value and will be an area of development on the Mid Kent contract as we go into our second (and first full) contract year.

As a company, we proudly support two national charities, Macmillan Cancer Support and the British Heart Foundation, while also encouraging our staff to contribute to local causes. Through our 'Day a Year to Volunteer' scheme, every employee is given a paid day to support a cause close to their heart.

Key highlights from contract year 1 include:

- ✔ Volunteering at Repton Connect Community Centre, assisting with the People's Pantry, deep cleaning the main hall and donating bags of food, hygiene products and festive treats.
- ✔ Volunteering at Demelza's Larkfield distribution centre.
- ✔ Hosting bake sales at each site to raise funds for the British Heart Foundation.
- ✔ Welcoming KMTV to join our street cleansing team in Swale, offering an inside look at the work that keeps the partnership boroughs clean.

- ✔ Repair roadshows and WEEE Initiatives, collaborating with local repair cafés to help residents fix, donate or responsibly dispose of waste electrical and electronic equipment (WEEE). The first event is set for April in Maidstone, with more planned throughout the year.
- ✔ Planting 633 trees at Allington Open Space in partnership with Maidstone Borough Council to mark the five year anniversary of the first COVID lockdown – one tree for each life lost to COVID-19 in the borough.

Looking ahead

We have an exciting year ahead, with further WEEE repair café events across Mid Kent, increased visibility of contract improvements and partnerships, and ongoing community engagement, including Christmas volunteering. Additionally, we will explore new engagement opportunities at our depots, promote electric vehicle adoption and continue to develop our partnerships and social value initiatives.



Planet

Environmental performance and sustainability

Environmental sustainability is central to SUEZ’s triple bottom line, alongside social responsibility and economic performance. In 2024, SUEZ earned a Gold Medal EcoVadis rating for the second consecutive year. With a score of 75 out of 100, we ranked within the top 5 percent of companies assessed globally. This recognition from the world’s largest and most trusted provider of business sustainability ratings highlights our strong and ongoing commitment to embedding sustainability throughout our operations.

In support of the Mid Kent Partnership’s environmental goals, we prioritised reducing the carbon footprint of our contract from the outset. During the first year, we introduced several key initiatives aimed at cutting emissions and improving energy efficiency. All refuse collection vehicles (RCVs) were fitted with electric bin lifts to reduce fuel consumption and idle times. Electric vehicles were also deployed across the supervisory team, with options extended to management, ensuring that low-emission transport is available at all levels.





We also improved our infrastructure to support environmental performance. Sensor lighting was installed in site cabins to minimise unnecessary energy use, and LED lighting was introduced across all workshops to lower energy consumption. Sustainability Champions were appointed at each site to lead best practices and engage colleagues in continuous environmental improvement.

Protecting and enhancing biodiversity is a vital part of our environmental strategy. Towards the end of 2024, we installed bird boxes and bug hotels at the Ashford and Maidstone depots to support local wildlife. Plans for contract year 2 include installing bat boxes at depots, creating green spaces and wildflower areas across our sites, and launching a PPE reuse scheme to reduce waste and extend the life cycle of equipment.

We are also increasing community involvement. Each site will participate in the Great British Spring Clean through local litter-picking events. A garden project will be launched in Swale and we will enhance the grassy bank behind the depot to further support biodiversity.

These initiatives reflect our long-term approach to sustainability, ensuring that Mid Kent benefits from a responsible, environmentally conscious, and future-focused service.



Introducing re-use

We are dedicated to helping our customers reduce waste and embrace re-use. In early 2025, we published our Re-use Manifesto, *Repair, Re-use, Reform – How to Accelerate Progress to a Circular Economy*, outlining steps to drive meaningful change in this area.

In Mid Kent, we have embedded re-use practices both internally and externally. Internally, all staff received reusable water bottles during their inductions at the start of the contract in March. Internal best practice will also be consolidated with the PPE reuse initiative we are launching.

Alongside this, externally, we are exploring our relationship with Demelza to focus on reusing bulky waste and will run Repair Cafés and WEEE initiatives throughout contract year 2.

Profit

Alongside environmental compliance and our continued commitment to social responsibility, it is essential that we continuously grow, evolve and invest in order to deliver the best possible service for Mid Kent and ensure value for money in everything we do.

At SUEZ, continuous improvement is embedded within our culture and our team in Mid Kent have embraced this wholeheartedly from the outset. Throughout contract year 1, we have implemented accurate reporting and data analysis, which has enabled us to make more informed operational decisions, drive efficiencies, and maintain a high level of service delivery across the partnership. Looking ahead, this strong data foundation positions us to be even more proactive and responsive.

We now have access to comprehensive datasets covering tonnage, seasonal holiday trends, absence patterns, and average finish times. This information gives us the ability to anticipate and address operational challenges more effectively as we move into future contract years. In Mid Kent, as elsewhere, this data insight enables us to dynamically manage our resources, increasing capacity during high-demand periods and optimising staffing during quieter times.

To further support this agile approach, we have established robust relationships with staffing agencies, giving us the flexibility to bring in additional support when required and maintain service continuity under pressure.

As the industry landscape continues to evolve and new regulatory frameworks emerge, we are committed to staying ahead of the curve, offering innovative, data-driven solutions that respond to the changing needs of our partners and the communities we serve. By doing so, we ensure that the Mid Kent partnership remains not only compliant and effective but also cost-efficient and future-ready.



Certification and legal compliance

Certificate GB99/50556

The management system of

SUEZ Recycling and Recovery UK Ltd

UK Head Office SUEZ House, Grenfell Road Maidenhead, Berkshire SL6 1ES United Kingdom

has been assessed and certified as meeting the requirements of

ISO 14001:2015

For the following activities

The Scope of Registration appears on page 2 of this certificate



This certificate is valid from 13 March 2025 until 27 September 2025 and remains valid subject to satisfactory surveillance audits.

Issue 50. Certified since 03 June 1999

Certified activities performed by additional sites are listed on subsequent pages.

L. Moran

Authorised by
Liz Moran
Business Manager

SGS United Kingdom Ltd
Rossmore Business Park, Ellesmere Port, Cheshire, CH65 3EN, UK
t +44 (0)151 350-6666 - www.sgs.com



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Certificate GB99/50556, continued

SUEZ Recycling and Recovery UK Ltd

ISO 14001:2015

Issue 50

The sampling and laboratory analysis of and reporting on waters, waste waters and organic wastes.

Provision of ice piggings, chlorination and specialist pipe services

The collection, transport, sorting, separation, treatment, recycling, recovery and disposal of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste)

The collection and transport of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste). The operation of logistics depots and vehicle workshops

The collection, transport, sorting, separation, treatment, recycling, recovery and disposal of controlled waste including household and municipal waste (including hazardous and difficult waste).

The transport, sorting, separation, treatment, recycling and disposal of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste).

The operation of energy from waste plants

The collection, transport, sorting, separation, treatment, recycling, recovery and disposal of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste).

The operation of materials recycling facilities, household waste recycling facilities, transfer stations, energy from waste plants, logistics depots, vehicle workshops and associated procurement activities.

The collection, transport, separation, treatment, recycling and recovery of materials for the production of compost

The collection, transport, sorting, separation, treatment, recycling, recovery and disposal of wood

The administration functions associated with the collection, transport, sorting, separation, treatment, recycling, recovery and disposal of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste).

The administration functions associated with the operation of materials recycling facilities, household waste recycling facilities, composting facilities, wood processing facilities, transfer stations including security shredding operations, energy from waste plants, landfill sites, gas utilisation plants, logistics depots, vehicle workshops and associated procurement activities.



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24



Certificate GB09/79537
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SUEZ Recycling and Recovery UK Ltd

UK Head Office SUEZ House, Grenfell Road Maidenhead, Berkshire SL6 1ES United Kingdom
has been assessed and certified as meeting the requirements of
ISO 45001:2018
For the following activities
The Scope of Registration appears on page 2 of this certificate

This certificate is valid from 13 March 2025 until 27 September 2025 and remains valid subject to satisfactory surveillance audits.
Issue 28. Certified since 27 September 2019
Certified activities performed by additional sites are listed on subsequent pages.

L. Moran

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Business Manager

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Certificate GB09/79537, continued
SUEZ Recycling and Recovery UK Ltd

ISO 45001:2018
Issue 28
The sampling and laboratory analysis of and reporting on waters, waste waters and organic wastes.
Provision of ice piggings, chlorination and specialist pipe services
The collection, transport, sorting, separation, treatment, recycling, recovery and disposal of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste)
The collection and transport of controlled waste including household, municipal, commercial and industrial waste (including hazardous and difficult waste). The operation of logistics depots and vehicle workshops
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Certification and legal compliance

Certificate GB94/3233

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UK Head Office SUEZ House, Grenfell Road Maidenhead, Berkshire SL6 1ES United Kingdom

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ISO 9001:2015

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Certificate GB94/3233, continued

SUEZ Recycling and Recovery UK Ltd

ISO 9001:2015

Issue 58

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Environmental Services and Climate Change Committee	
Meeting Date	10 th July 2025
Report Title	Local Cycling and Walking Infrastructure Plan (LCWIP) - public consultation
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Michelle Anderson, Active Travel Officer
Classification	Open
Recommendations	1. To agree to proceed to public consultation for the Swale Local Cycling and Walking Infrastructure Plan (LCWIP).

1 Purpose of Report and Executive Summary

- 1.1 This report explains the methodology used to create the draft Local Cycling and Walking Infrastructure Plan (LCWIP) and show the advantages of having one in place.
- 1.2 To share the Swale LCWIP executive summary which sets out the proposed priority routes that will form the basis of the proposed public consultation.
- 1.3 To share the full LCWIP report.
- 1.4 To gain agreement to proceed to public consultation.

2 Background

- 2.1 LCWIPs are evidence-led, long-term plans to identify cycling, walking, and wheeling improvements. By developing a Swale-wide LCWIP, we will be able to take an informed network-based approach to planning and delivering these improvements.
- 2.2 It is important to note that Faversham already has an existing agreed LCWIP which has been led by Faversham Town Council. As a result, this paper and plan is focused on the other two main residential areas in the borough; Sheppey and Sittingbourne but the overall document covers all 3 urban areas to bring the whole Borough into one place.
- 2.3 There are many advantages to having an agreed LCWIP for Swale. These include the following:

Health and Well-being:

- An LCWIP will encourage more people to walk and cycle for everyday journeys. In turn, this will lead to increased physical activity and improved health.
- This can help reduce obesity, lower the risk of chronic diseases, and improve mental health.

Environmental Benefits:

- By reducing car dependency through walking and cycling, it will help to improve air quality and reduce carbon emissions. This will contribute to a healthier environment for all residents and visitors to the borough.
- LCWIPs can also support the development of green infrastructure, creating more pleasant and attractive spaces.

Economic Benefits:

- Investing in the cycling and walking infrastructure can stimulate local economies by attracting tourists and businesses. It can lead to an increased footfall in town centres and boost the local economy.
- Safe and convenient cycling and walking routes can also help reduce congestion, making it easier and faster to travel.
- Evidence suggests that switching to active travel for short motor vehicle trips could save £17bn in NHS costs (nationally) over a 20-year period, with benefits being accrued within 2 years for some conditions. The largest cost savings would come through reductions in the expected number of cases of type 2 diabetes (annual cost to NHS from diabetes is £9bn). ¹
- LCWIPs ensure that cycling and walking are accessible to all, including those with disabilities, and that routes are well-connected to other forms of transport. This can improve access to jobs, schools, shops, and other amenities, making it easier for people to get around.
- A local agreed LCWIP allows Swale Borough Council to be in a better position to bid for active travel funding in the future.

Enhanced Quality of Life:

- Safe, well-maintained walking and cycling routes can create more vibrant and attractive neighbourhoods.
- They can also help reduce traffic noise and congestion, making areas more pleasant and enjoyable to live in.

¹ Jarrett J, Woodcock J, Griffiths U et al (2012) Effects of increasing active travel in urban England and Wales on costs to the National Health Service. The Lancet, 379: 2198-2205

A platform for other projects

- An LCWIP can help other local projects to gain support. For example, the Sheppey Light Railway Greenway project could gain greater support and funding with the adoption of a Swale LCWIP.

In essence, LCWIPs provide a comprehensive approach to improving the lives of residents by promoting active transport, enhancing the environment, and boosting the local economy.

- 2.4 The Active Travel Officer has been working with consultants, AECOM, over the last 6-8 months to merge the two draft LCWIPs for Sittingbourne and Sheppey into one and to also create a more succinct and user-friendly executive summary (see below attachment).
- 2.5 The consultants have spent many months collecting data and conducting the necessary analysis required to determine the primary routes selected for this LCWIP. This included:
- Population information and demographics.
 - Employment density.
 - Car availability per household.
 - Trip generators and attractions (both now and looking ahead at future planned developments).
 - Areas of deprivation in the borough.
 - The existing and future active travel network including public transport links and availability.
 - The highway network.
 - Travel patterns within the borough.
 - The topography of the borough to highlight any physical constraints.
- 2.6 Well established software was also used to look at the propensity to cycle in the borough and visum flows (a tool to see how future travel is likely to change based on the background population growth, the completion of new developments, and all other growth factors considered in the transport model).
- 2.7 From the data gathered, analysis then took place to understand which key cycling and walking routes should be included in the LCWIP. The key origins and destinations of journeys, their associated desire lines and how often they are likely to be used were all determined. This then allowed us to classify those routes into primary routes (high flow), secondary routes (medium flow) and local

routes (low flow). This was done for both cycling and walking for both areas to give the 17 cycling routes and 24 walking routes that are proposed to go to public consultation.

- 2.8 Stakeholder engagement has been undertaken during this process and the feedback has been included in the main LCWIP document on page 85. The KCC Active Travel Co-ordinator has also been engaged in this process.
- 2.9 To improve the cycling and walking infrastructure for the borough, we must secure funding for both the necessary design work for the routes as well as for the infrastructure itself. Active Travel England is the primary source of funding for active travel, and, without an LCWIP, it is unlikely that Swale Borough Council will gain any funding to complete these activities.
- 2.10 Swale Borough Council is in a very good position within Kent with a full-time, dedicated active travel officer in post. What it is lacking, however, is a local LCWIP which is essential to gain the funding and drive the improvements forward.
- 2.11 Funds have already been secured from the Capability Fund for the work completed to date and for the proposed public consultation.

3 Proposals

- 3.1 The proposal is to proceed to public consultation for the Swale LCWIP. It is proposed that this will take place in September 2025 and will be hosted on the consultant's platform.

4 Alternative Options Considered and Rejected

- 4.1 To keep two separate LCWIPs (Sheppey Towns and Sittingbourne) and run two separate consultation processes. This was rejected as it would involve too much duplication and would not be efficient both in terms of finances and time.
- 4.2 To not have a local LCWIP at all. This was rejected as it would severely jeopardise our position to be able to secure future funding for any active travel improvements within the borough.
- 4.3 To implement a local LCWIP without going through public consultation. This has been rejected as it is important to remain engaged with residents and gain their valuable local knowledge in decision making and plans. Resident involvement and approval of the routes will ensure they are better utilised when installed.

5 Consultation Undertaken or Proposed

- 5.1 KCC's Active Travel Co-ordinator has been fully engaged throughout this process and is supportive of this plan.
- 5.2 It is proposed that the consultation will run for 8 weeks, starting in September 2025 and will be hosted on the consultant's platform. The purpose of the consultation is to gain the views of local residents and organisations on the proposed routes within the LCWIP. All comments and feedback will be analysed and considered in the final report.
- 5.3 Consultation will be on-line, but it is proposed that some static stands will be available in the borough for residents to be able to view paper copies of the reports and maps available. The Active Travel Officer will also be available to attend Area Committee meetings, parish and town council meetings or other meetings as necessary to present an overview of the plan.
- 5.4 Social media will be used to promote the consultation alongside links on our website.

6 Implications

Issue	Implications
Corporate Plan	The creation of an LCWIP supports the 'Environment priority' within the Corporate Plan; "To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead." It also supports the section which states Swale Borough Council will: "Form partnerships with key stakeholders to ensure we champion active travel opportunities."
Financial, Resource and Property	To finalise the Swale LCWIP, funding is already in place. Each of the interventions mentioned in the LCWIP will require detailed design and feasibility work to be undertaken. To secure future funding to implement interventions agreed in the LCWIP, it is anticipated that Active Travel England and KCC will be the two main funding streams in the future, but it is likely that an agreed LCWIP will be one of the criteria for this funding.
Legal, Statutory and Procurement	The development of the LCWIP has followed national guidelines to ensure it is robust and deliverable.
Crime and Disorder	N/A

Environment and Climate/Ecological Emergency	By having an agreed LCWIP and implementing interventions, the long-term environmental and climate impact will be positive for all residents and the Borough as a whole.
Health and Wellbeing	There are numerous health and wellbeing advantages to encouraging more active travel and these are well documented on the Active Travel England websites.
Safeguarding of Children, Young People and Vulnerable Adults	N/A
Risk Management and Health and Safety	The primary risks are associated with securing the funding from Active Travel England (via KCC) for future financial years. However, active travel is becoming more prevalent on the Government's agenda and the relatively recent creation of Active Travel England also indicates that funding is set to continue in future years.
Equality and Diversity	The LCWIP will incorporate all forms of active travel including wheeling – i.e. wheelchairs and mobility scooters as well as walking and cycling.
Privacy and Data Protection	The privacy and data protection team have been consulted on the wording required for the public consultation and have also reviewed the proposed question set.

7 Appendices

7.1 The Swale LCWIP Executive Summary report and full LCWIP report.

8 Background Documents

None

Swale Local Cycling and Walking Infrastructure Plan

Executive Summary

Swale Borough Council

May 2025

Introduction

Active travel, which comprises **walking, wheeling and cycling**, is becoming increasingly important as challenges around climate change become more pressing and the demand for active travel solutions grows. Investment in cycling and walking can have **wider positive impacts on people and places**, making roads quieter and safer, improving air quality, improving physical and mental wellbeing and creating attractive places for people to live.

LCWIPs aim to both **encourage and facilitate the modal shift** away from motorised vehicles to more active modes, transforming areas in ways which **support active travel, reduce congestion, support local economies and improve physical and mental health** in line with sustainable visions at a local to a national level.

LCWIPs outline a “strategic approach to identifying cycling and walking improvements required at a local level”.

Policy Context

Cycling and Walking Investment Strategy

In 2017, the Department for Transport (DfT) published their first **Cycling and Walking Investment Strategy (CWIS)**. The aim of this was to encourage cycling, walking and wheeling to become a key mode of travel for shorter journeys or as a stage of a longer journey by delivering better safety, mobility and streets. In 2021, the Government announced the second CWIS which reflects new active travel policies, financial investment into active travel in England and performance monitoring against both the first and second CWIS objectives. Alongside the CWIS, the DfT published practical, strategic guidance on developing Local Cycling and Walking Infrastructure Plans (LCWIPs) for local bodies.

The LCWIP Process Includes...



Defining the geographic scope of the LCWIP

Gathering information on current cycling and walking patterns and review relevant transportation and land use policies.



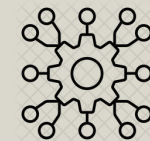
Identifying origin and destination points and cycle flows. Convert flows into a network of routes and identify improvements.

Identifying key trip generators and walking and wheeling zones. Creating a network of routes and improvements



Prioritising proposed routes and improvements to develop a prioritized programme of delivery

Integrating outputs into local planning and transport policies, strategies, and delivery plans.



Introduction

Gear Change: A bold Vision for Cycling and Walking

Gear change describes the vision to make England a great walking and cycling nation. One of its aims is for half of all journeys in towns and cities being cycled or walked by 2030.

The Transport Decarbonisation Plan

The Transport Decarbonisation Plan sets out the government's commitments and the actions needed to decarbonize the entire transport system in the UK. The first strategic priority it sets is "Accelerating modal shift to public and active transport [making them] the natural first choice for our daily activities".

Local Transport Note 1/20

The Local Transport Note 1/20 (LTN 1/20) for cycle infrastructure design establishes five design principles for active travel networks and their routes: cohesion, directness, safety, comfort, attractiveness.

The Inclusive Mobility Guidance

Inclusive Mobility is the government's guide to best practice on improving access to public transport and creating a barrier-free pedestrian environment. Creating and maintaining accessible public realm is crucial for ensuring that disabled people are not excluded from playing a full role in society.



Determining Scope

Study Area

Swale is one of the 12 districts in Kent, it is bounded by Medway, Canterbury, Ashford and Maidstone. The LCWIP study area is covering the whole of Swale.

Given the importance of encompassing both rural and urban areas as well as connections between key settlement clusters, additional smaller-scale study areas have been identified within Swale as shown in Figure 1: Sittingbourne, Faversham, Sheppey towns and rural Swale.

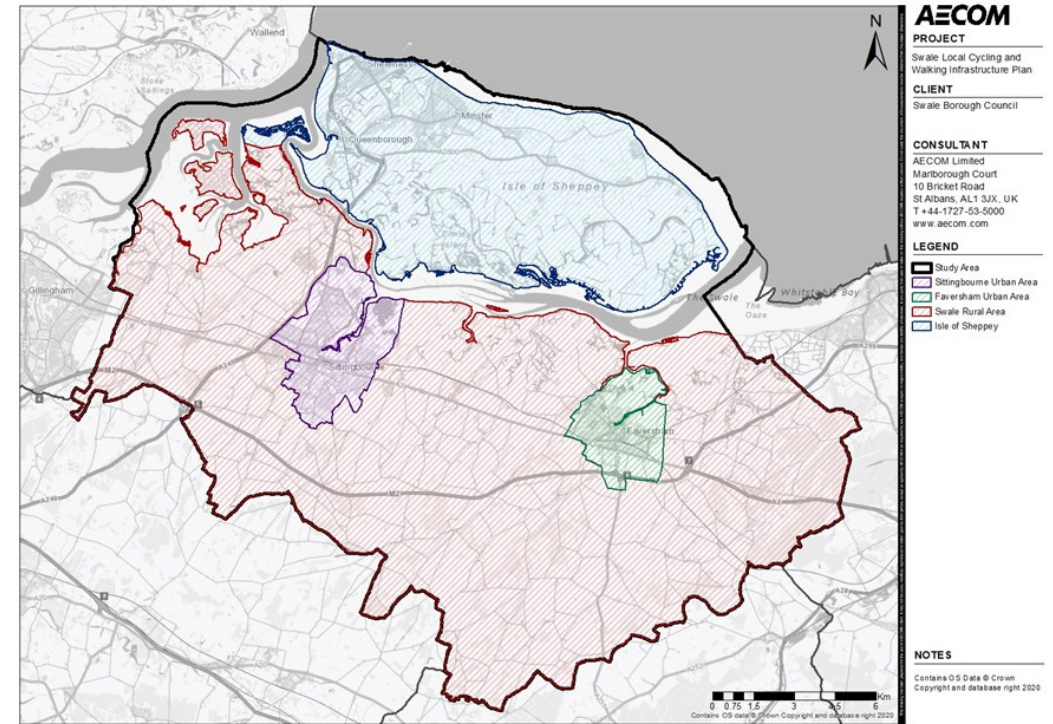


Figure 1: Study Area - Swale

Swale LCWIP Approach

The aim of this integrated **Swale LCWIP** is to build on existing active travel work and merge several local LCWIPs into a single borough-wide plan. It addresses gaps in the proposed network and suggests new routes to close them, presenting a coherent active travel network to support future funding bids. Specifically, it incorporates the existing **Faversham LCWIP** (developed by Faversham Town Council) and the draft **Sheppey Towns LCWIP** (developed by WSP), and identifies walking and cycling routes in other areas of Swale, including Sittingbourne and rural parts of the borough. It also aligns with the KCWIP by proposing several cross-border routes that connect Swale with the wider Kent network.

As the Faversham LCWIP and KCWIP routes have already undergone public consultation, the upcoming consultation for the Swale LCWIP will focus on all other active travel routes.

Gathering Information

During Stage 2 of the Swale LCWIP, a comprehensive review was undertaken of the local area context to understand the existing and future active travel provision, Swale's demographics and any barriers to active travel, as summarised below:



Swale is bounded by Medway, Canterbury, Ashford and Maidstone. According to the 2021 Census, Swale's population is around **151,700** - an **increase of 11.7%** since the 2011 Census

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Swale has high **employment density** in Sittingbourne, Faversham and the Sheppey Towns. Swale has large **disparities in levels of deprivation**, from prosperous parts of Faversham to pockets of deprivation on the Isle of Sheppey such as Sheerness and Queenborough, which are some of the most deprived wards in England.



The spatial redistribution of people towards urban areas results in pockets of **low car dependency in towns** and **higher car dependency in rural areas**. There are a number of

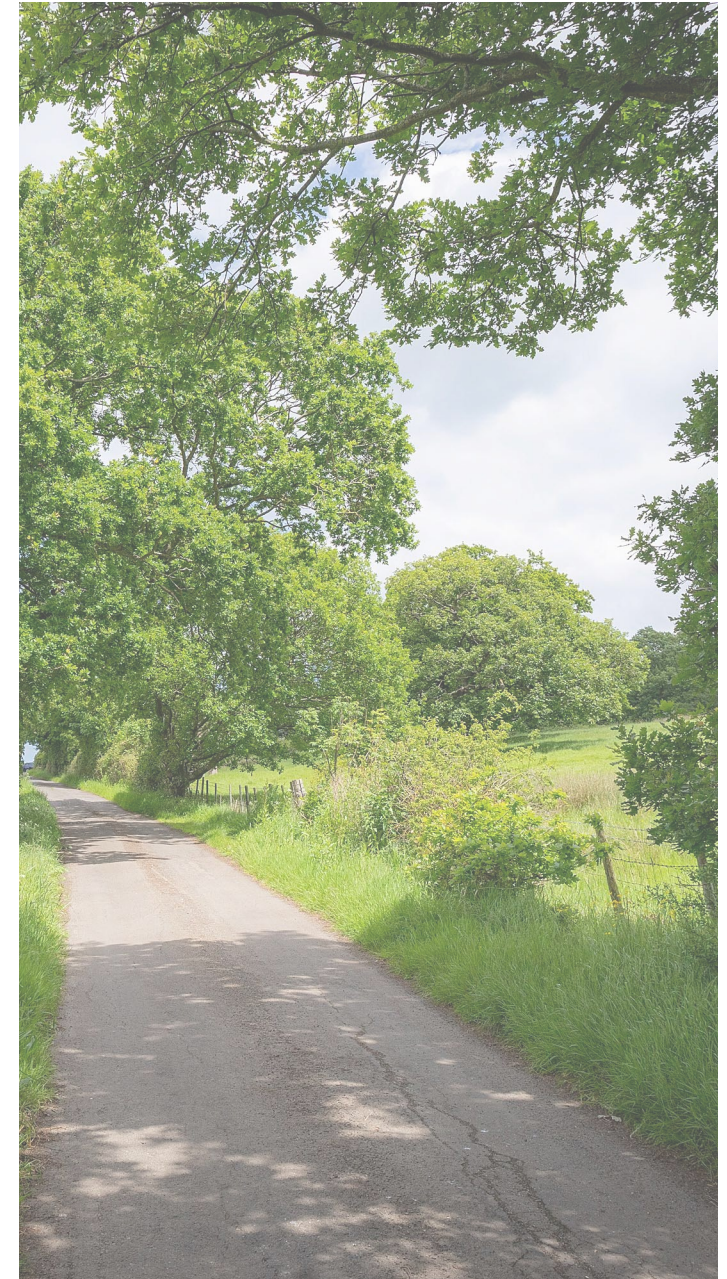
committed developments across Swale, largely located on the urban peripheries of Sittingbourne and Faversham and the Isle of Sheppey.



The walking network across Swale is diverse in terms of the **network density and quality**. Whilst there are significant **network gaps** on the Isle of Sheppey and across rural Swale, there are several **well-established and signposted longer and shorter walking routes**. There are also more dedicated walking facilities in the urban areas of Sittingbourne and Faversham.



The existing cycling network across Swale is largely comprised of the **National Cycle Network (NCN)**, which offers some **inter-urban connectivity** across Swale. There is also a network of cycling infrastructure across Swale, however this is **sparse, fragmented and substandard** in some locations. Additionally, it is mainly located within Sittingbourne, with notable gaps in rural areas.



Gathering Information



Swale's rail network offers **direct links** from Sittingbourne and Faversham to St Pancras, Victoria and Charing Cross with 5 services per hour in peak times. The bus network, is concentrated around urban areas and in rural areas, it is more **unreliable and infrequent**.



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Swale is bounded north-south and east-west by some of the most **dangerous rural roads [1]**, which are typically associated with high vehicle speeds, a high number of road accidents and are key indicators of **community severance**.



The potential for modal shift is indicated by the **Propensity to Cycle Tool** which shows that there is low levels of cycling between towns on the Isle of Sheppey and also between Sittingbourne and Faversham.



Sittingbourne, Faversham and the Isle of Sheppey have a high number of **key trip generators and attractors**, with a number of major employment

sites, such as the HMP Sheppey Cluster on the Isle of Sheppey whilst rural Swale has fewer trip generators and attractors.

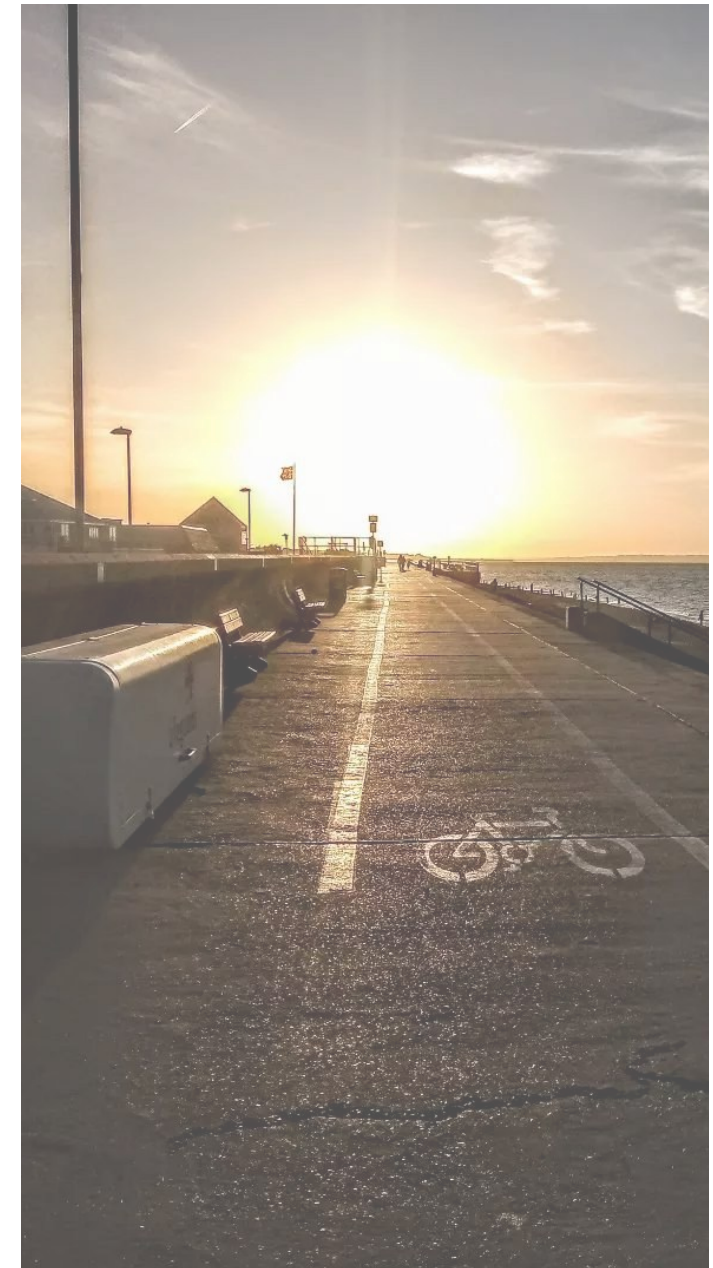


The **proposed active travel schemes**, studies or audits which have been undertaken across Swale include: Sustrans Sheppey Audit, Faversham Town Audit, Swale Cycling and Walking Framework Consultation, Active Travel 4 Proposals, Kent Local Walking and Cycling Infrastructure Plan, Faversham LCWIP, Faversham to Teynham Quietway, the Sheppey Light Railway Greenway Route and the Sheppey Towns LCWIP.



To better understand the perception of the existing network and active travel facilities, information was gathered through the online '**Widen My Path**' tool and the '**Your Everyday Trips**' survey which was undertaken in 2022. These tools help to understand barriers and opportunities for active travel in Swale.

[1] The AA Charitable Trust, <https://www.theaa.com/about-us/newsroom/rural-roads>



Additional Information

Sheppey Light Railway Greenway Route

The SLRG Group was formed by Islanders in 2022 to **promote a safe walking, wheeling and cycling route**, or Greenway, across the Isle of Sheppey, inspired by the path of the disused **Sheppey Light Railway**. The ambition is to better **connect communities** by giving people the choice to travel across the island under their own steam.

As shown in Figure 2, the Greenway connects Laysdown, Bay View, Eastchurch, Brambledown, Minster on Sea, Halfway, Sheerness and Queenborough.

The volunteer-led project has gathered support from **local residents, businesses, town & parish councils, Swale Borough Council and Kent County Council**. With landowner support, the Group's volunteers have already improved part of the route between Power Station Road and Scrapsgate. An example of the work which the Group is doing can be seen in Figure 3.

Much of the Group's time is focussed on **negotiating with all the landowners** along the proposed route, which wherever possible, follows the former railway.

The SLRG route is visible on the LCWIP consultation map in black. It connects with the proposed active travel networks across the Sheppey towns.

Please feel free to include feedback on the SLRG route as part of this public consultation.



Figure 3: Sheppey Light Railway Greenway
Source: Sheppey Light Railway Greenway Group

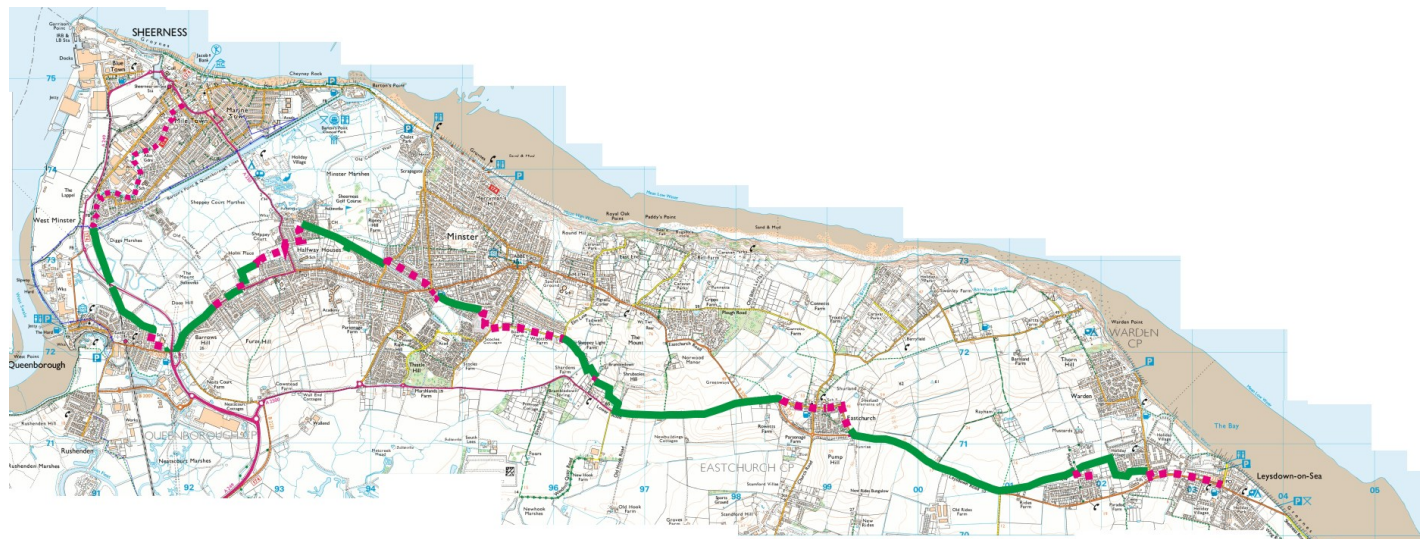


Figure 2: Sheppey Light Railway Greenway Route

Network Planning for Cycling

Want more information?
Please see [Appendix A](#)

Introduction

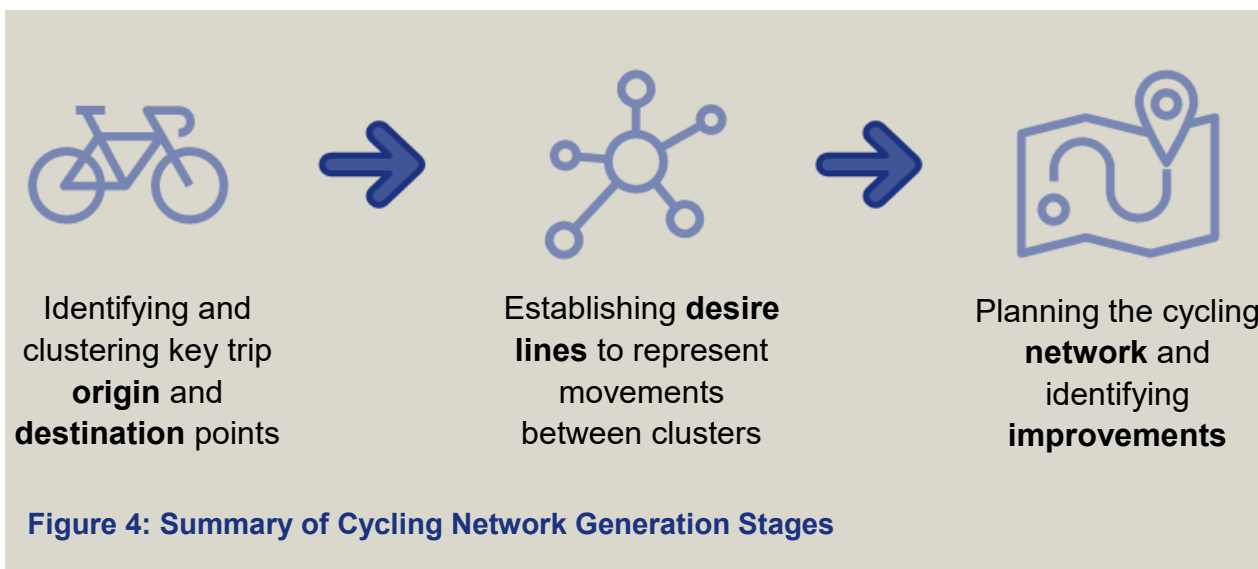
The evidence gathered in Stage 2 informed the identification of potential cycling **infrastructure improvements** and key cycle **routes**.

Figure 4 shows an overview of the Network Planning for Cycling stage of the LCWIP, as outlined in the DfT's LCWIP Guidance.

The routes emerged from comprehensive data analysis and were informed by various data sources as detailed in previous sections of this report. Stakeholder engagement was undertaken to gather real-world opinions on the identified networks.

Alignment decisions considered the **existing and forthcoming active travel** network, **local conditions** such as gradient, terrain and **cycling accessibility** were also factored into the route selection, ensuring they achieve the **core design outcomes** of being coherent, direct, safe, comfortable, and attractive. High-level interventions along the final cycling routes are presented at the end of this section.

The proposed Swale LCWIP cycling network is presented in Figures 5 to 7.



Network Planning for Cycling

Want more information?
Please see Appendix X

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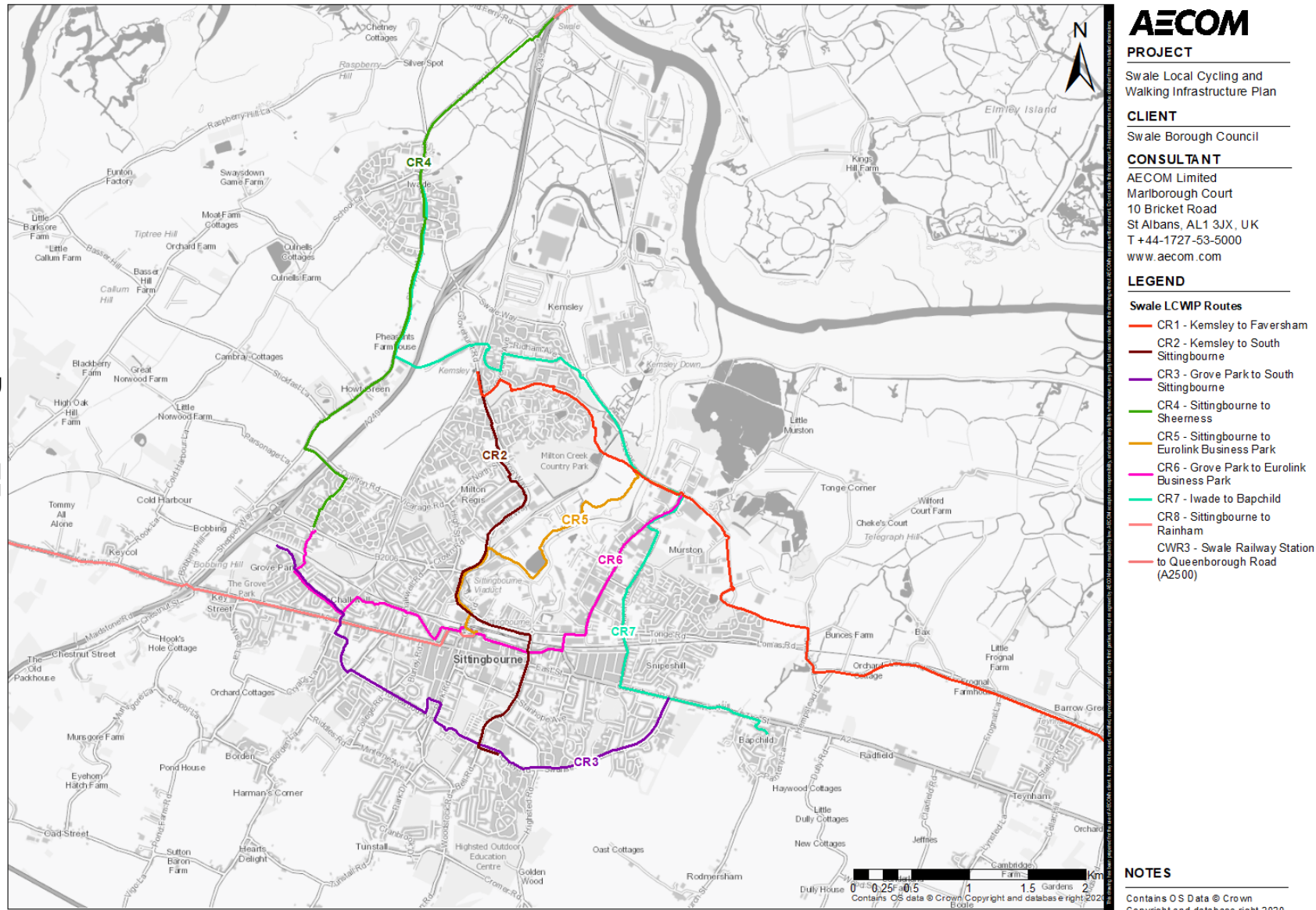


Figure 5: Identified Cycling Network - Sittingbourne

Network Planning for Cycling

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Please see Appendix X

Page 76

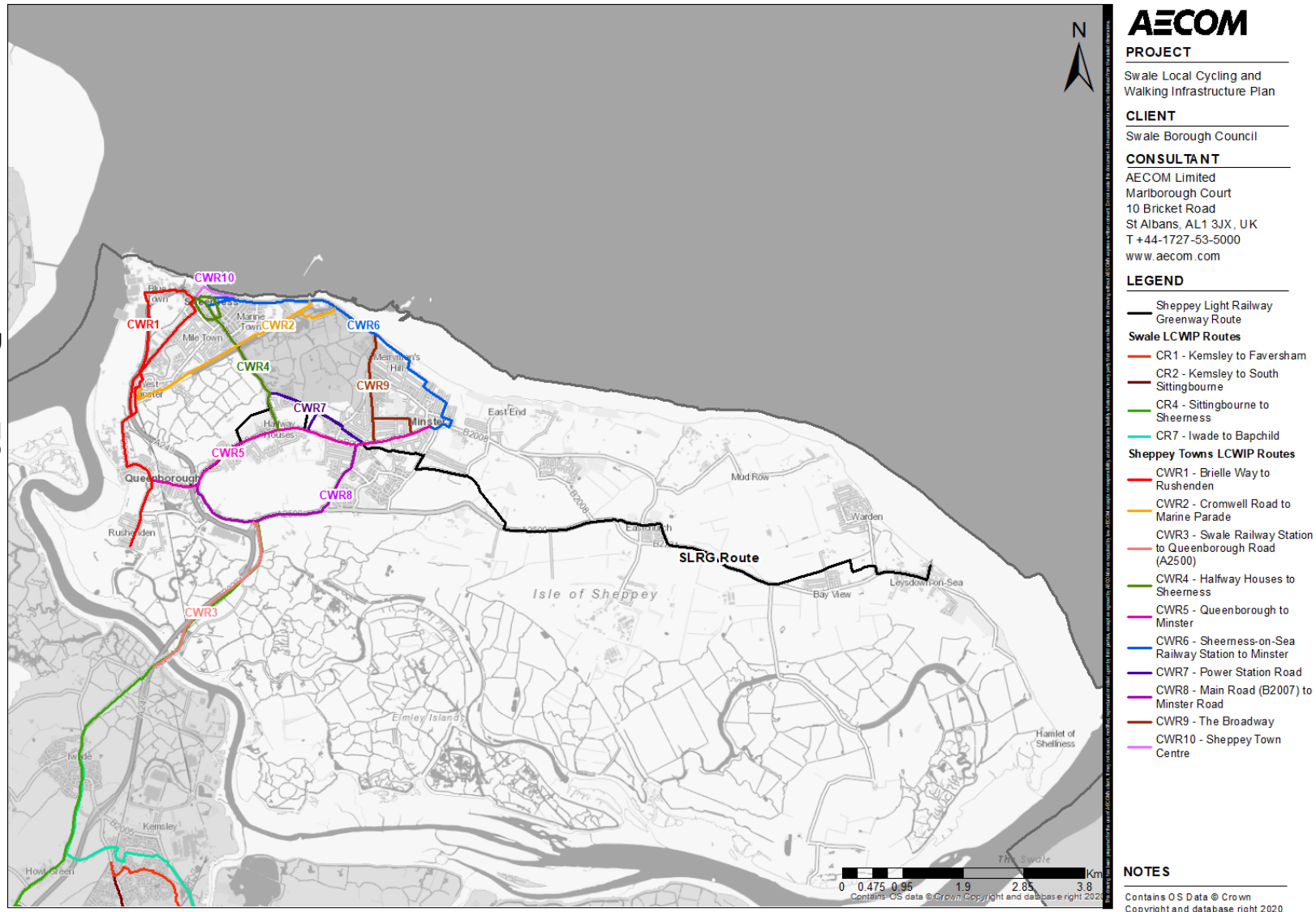


Figure 6: Identified Cycling Network - Sheppey Towns

Network Planning for Cycling

Want more information?
Please see Appendix X

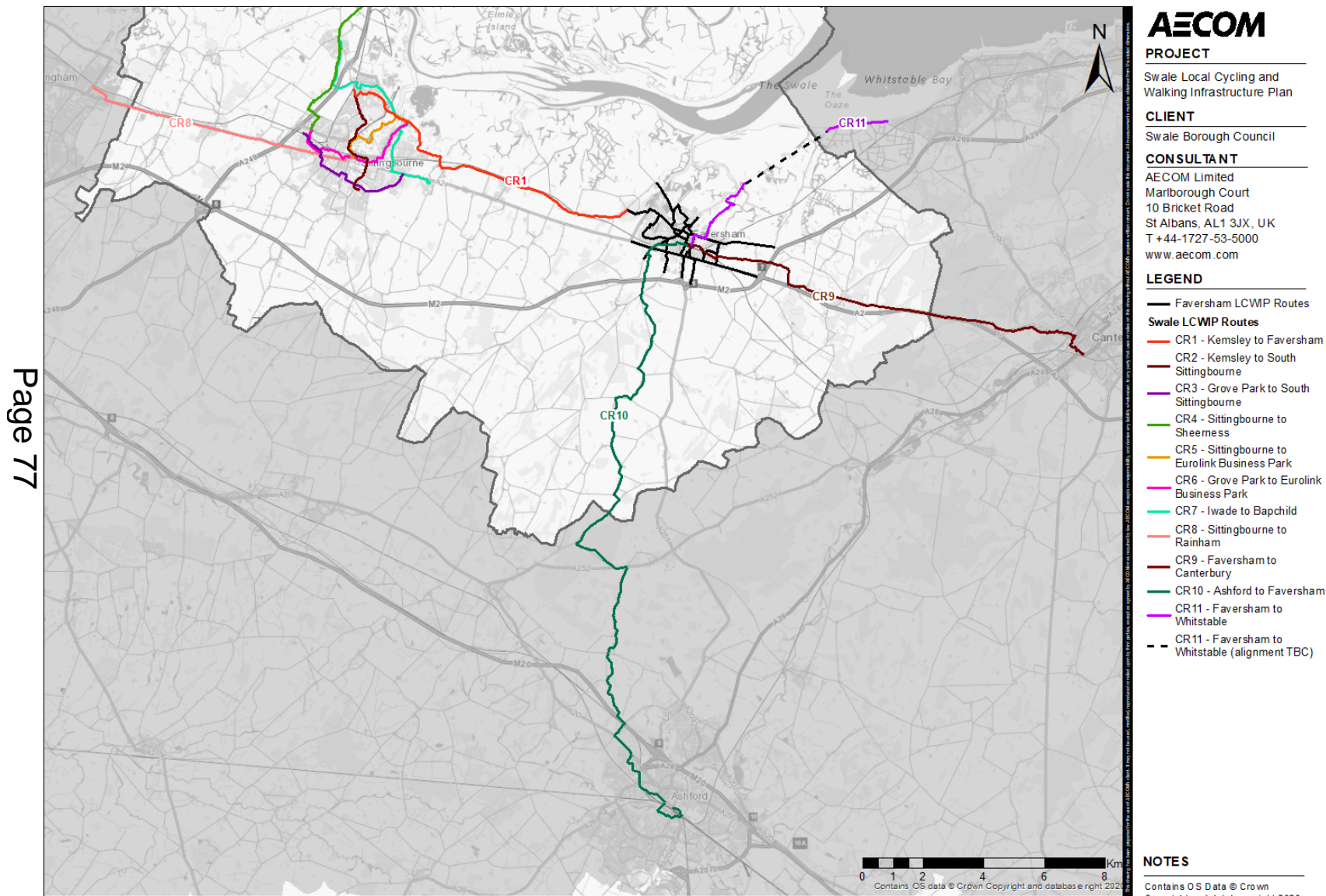


Figure 7: Identified Cycling Network - Rural Swale

Network Planning for Cycling

Want more information?
Please see [Appendix A](#)

Identifying Interventions

Proposed interventions were identified through a comprehensive desktop analysis (and route audits for the Sheppey Towns LCWIP routes). Proposed cycling interventions included:

- Improving **route continuity**, overcoming barriers and severance
- Installation of **new and improved crossings** for cyclists
- Provision of **segregated cycle lanes** (or introduction of segregation to existing facilities)
- Introduction of **speed limit reductions**, **traffic calming** and other measures to reduce motor traffic speed and dominance and promote a more comfortable cycling environment, and
- The installation of **improved wayfinding and signage** and enhanced street lighting.

It is important to note that these are high-level interventions and further study and a greater level of investigation and assessment is required prior to design, consultation and implementation. The deliverability in terms of constraints, risks and costs for multiple

options are all important considerations.

An example cycling route along with the proposed interventions can be seen in Figure 8. The final network of planned/ proposed cycling routes can be seen in Figure 9 and

the detailed route maps and interventions can be seen in **Appendix X** to **Appendix X**.

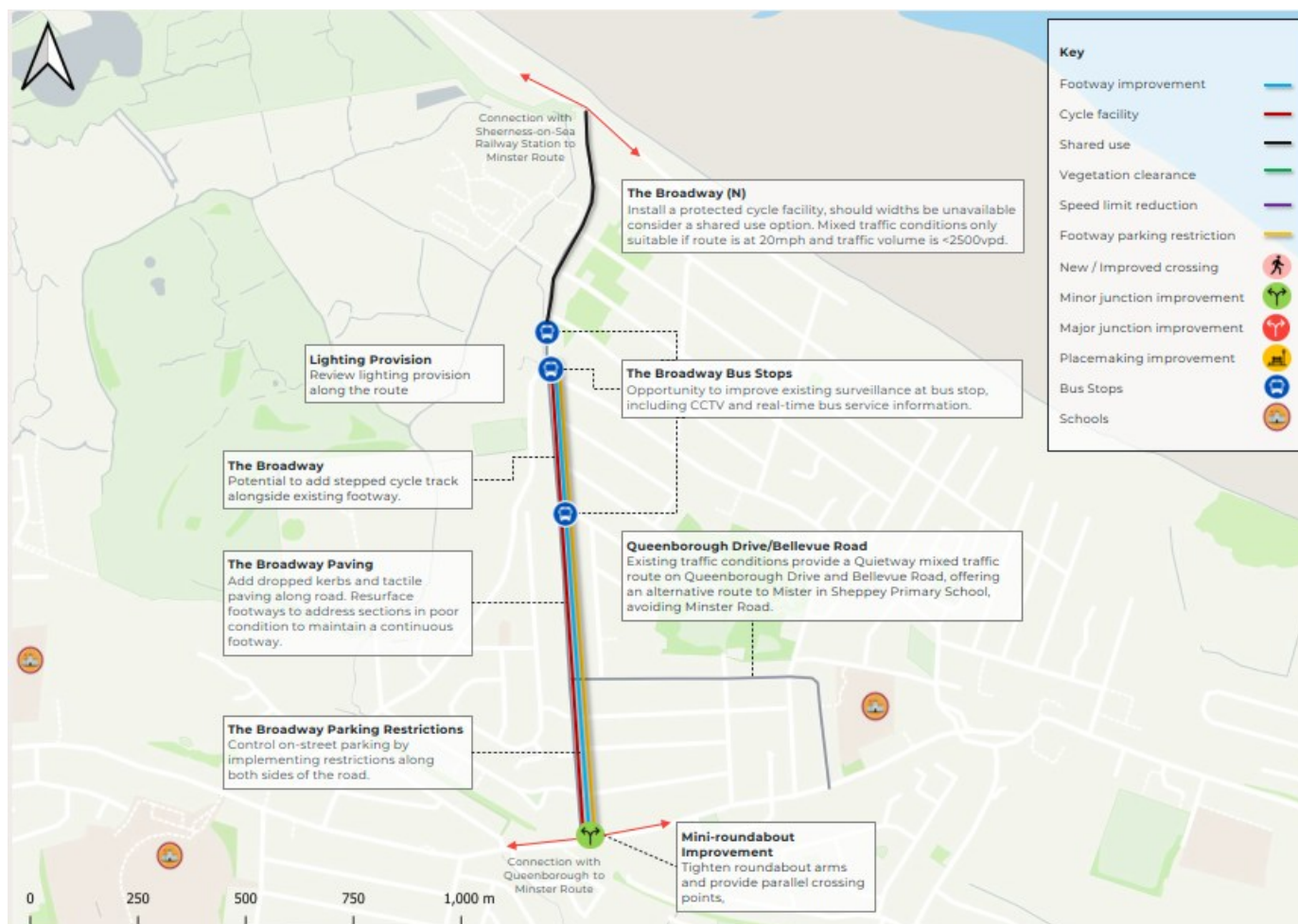


Figure 8: Identified Cycling Improvements Along CR1

Network Planning for Cycling

Want more information?
Please see Appendix X

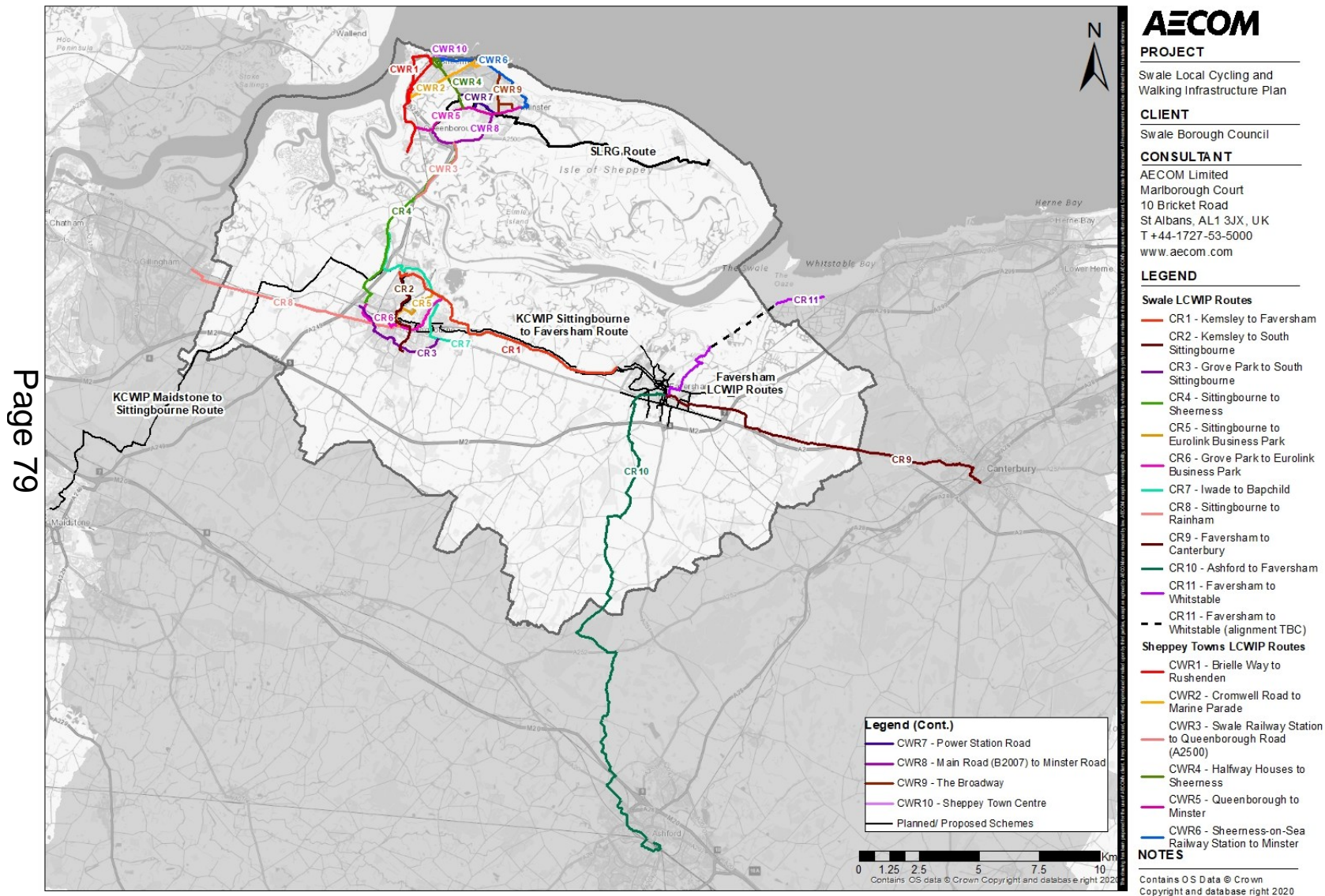


Figure 9: Identified Cycling Network for Public Engagement

Network Planning for Walking & Wheeling

Want more information?
Please see [Appendix B](#)

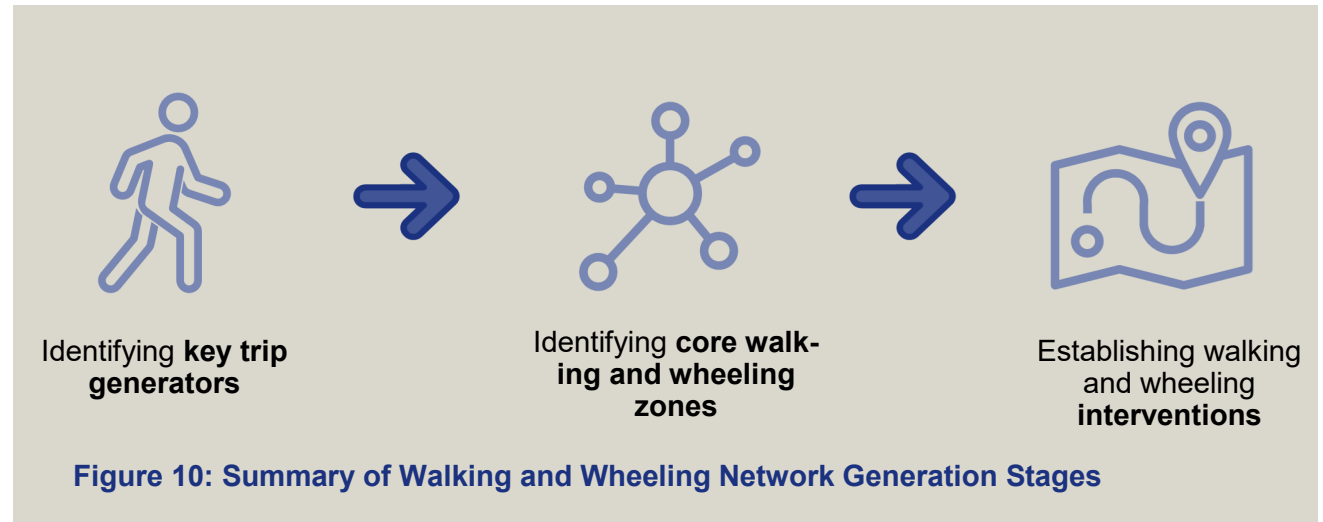
Introduction

This section outlines the steps followed to map the future walking and wheeling network, as defined by the DfT Local Cycling and Walking Infrastructure Plans guidance, and shown in Figure 10. This process incorporated **current and future trip generators**, **walking patterns**, the **existing and planned active travel network**, and feedback from key **stakeholders**.

This section uses the phrase ‘walking and wheeling’. Sustrans defines this as “representing the action of moving at a pedestrian’s pace, whether or not someone is standing or sitting, walking or wheeling unaided or using any kind of aid to mobility, including walking aids, wheeled aids, personal assistants or support animals.”

The walking and wheeling routes aim to encourage short trips to be made on foot rather than by car. The routes were developed from various data sources and stakeholder engagement was undertaken to help identify **local daily travel needs** or **barriers** to walking and wheeling to ultimately define the final network. High-level interventions along the final walking and wheeling routes are presented at the end of this section.

The Swale LCWIP walking and wheeling network is presented in Figure 11 and Figure 12.



Network Planning for Walking & Wheeling

Want more information?
Please see Appendix X

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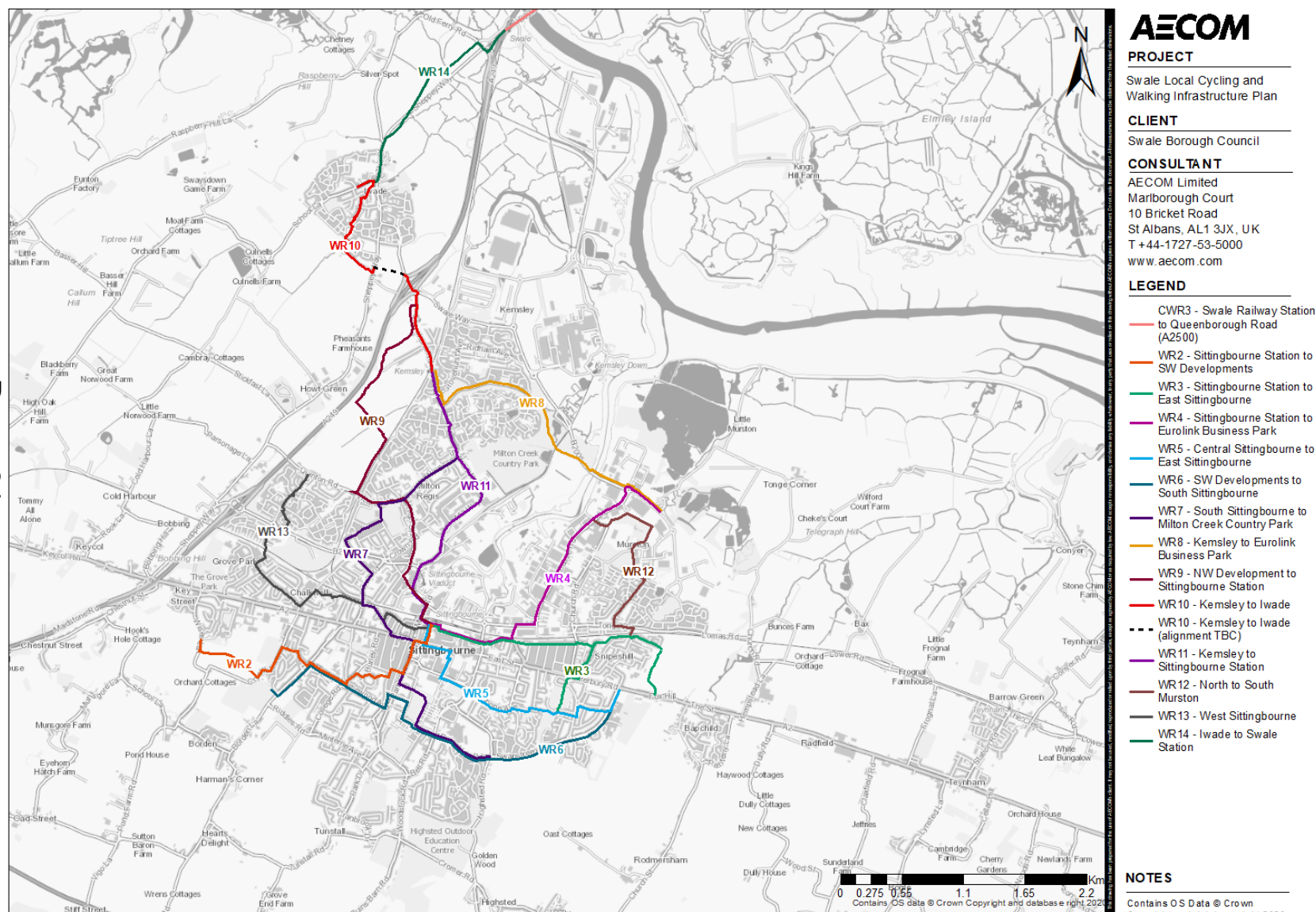


Figure 11: Identified Walking and Wheeling Network - Sittingbourne

Network Planning for Walking & Wheeling

Want more information?
Please see Appendix X

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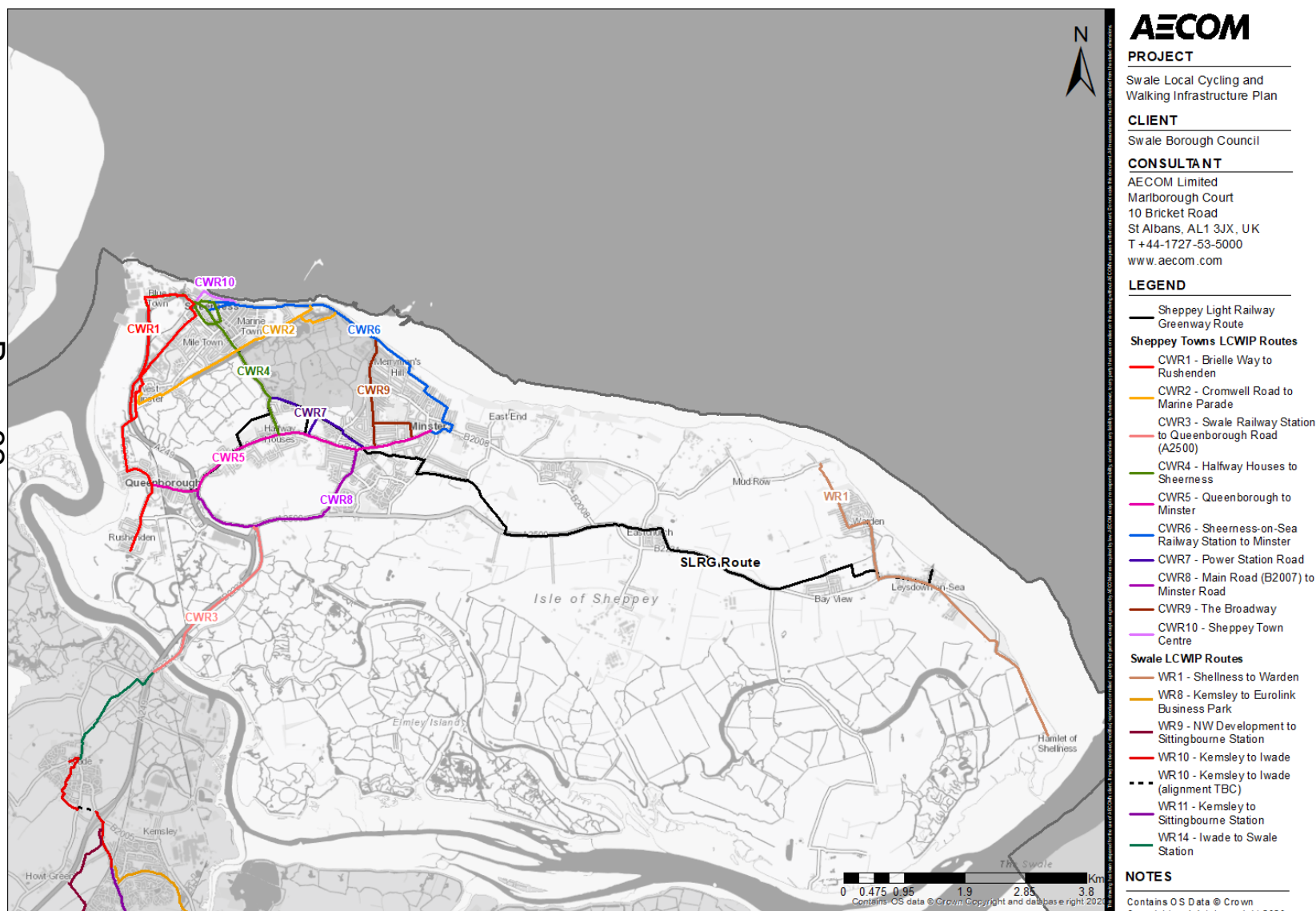


Figure 12: Identified Walking and Wheeling Network - Isle of Sheppey

Want more information?
Please see **Appendix B**

Proposed interventions were identified through a comprehensive desktop analysis and route audits for the Sheppey Towns LCWIP routes. Proposed walking and wheeling interventions included:

- Improving **route continuity** and **level of provision**, including overcoming barriers and severance to pedestrian movement along the identified routes
- Installation of **new and improved pedestrian crossings**, including upgrading uncontrolled crossings to controlled crossings and introducing pedestrian priority at key locations, and
- Implementation of an appropriate **wayfinding** system.

An example walking and wheeling route along with the proposed interventions can be seen in Figure 13. The final network of planned/ proposed walking and wheeling routes can be seen in Figure 14 and the detailed route maps and interventions can be seen in **Appendix X** to **Appendix X**.

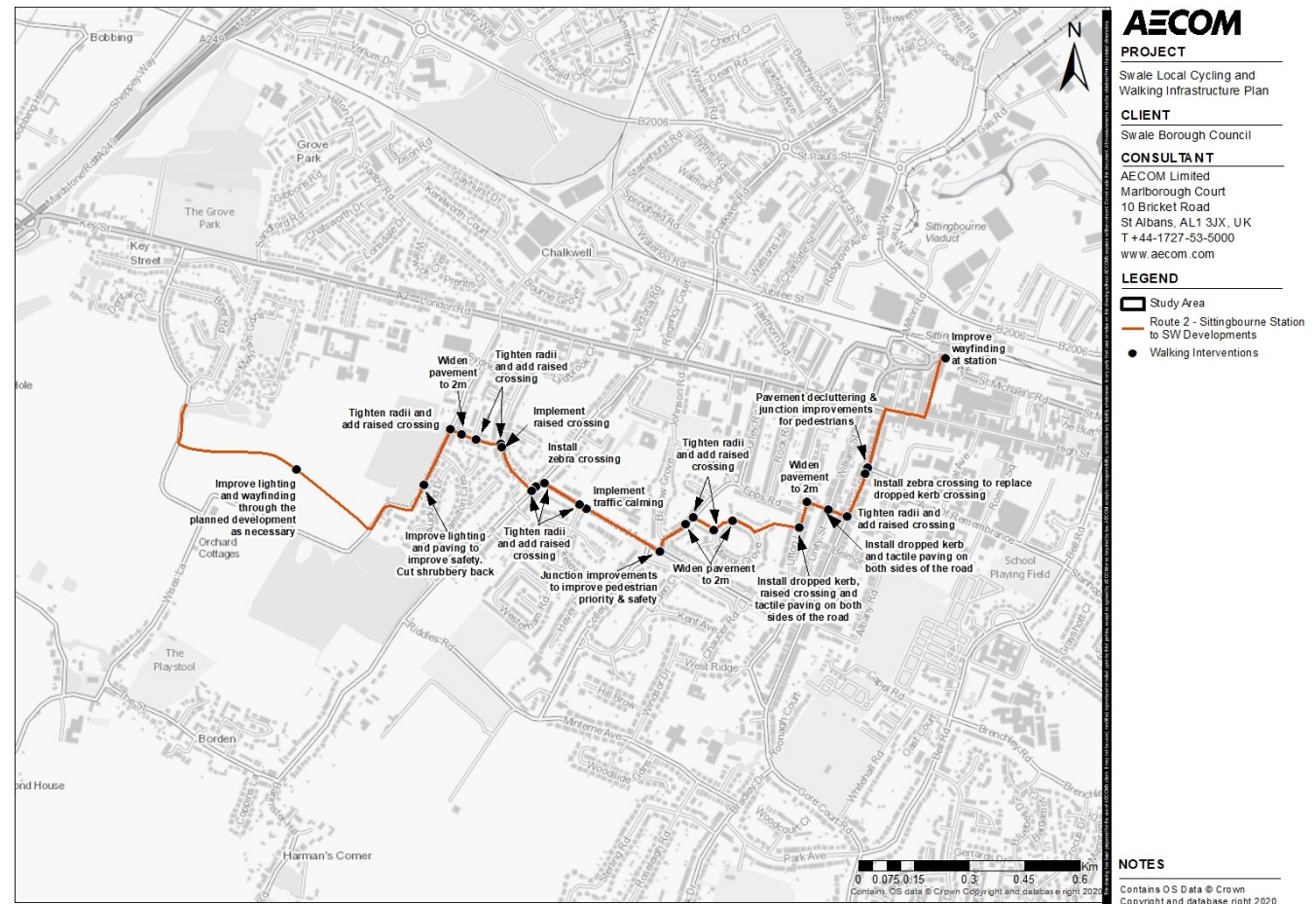


Figure 13: Identified Walking and Wheeling Improvements Along WR2

Network Planning for Walking & Wheeling

Want more information?
Please see Appendix X

Page 84

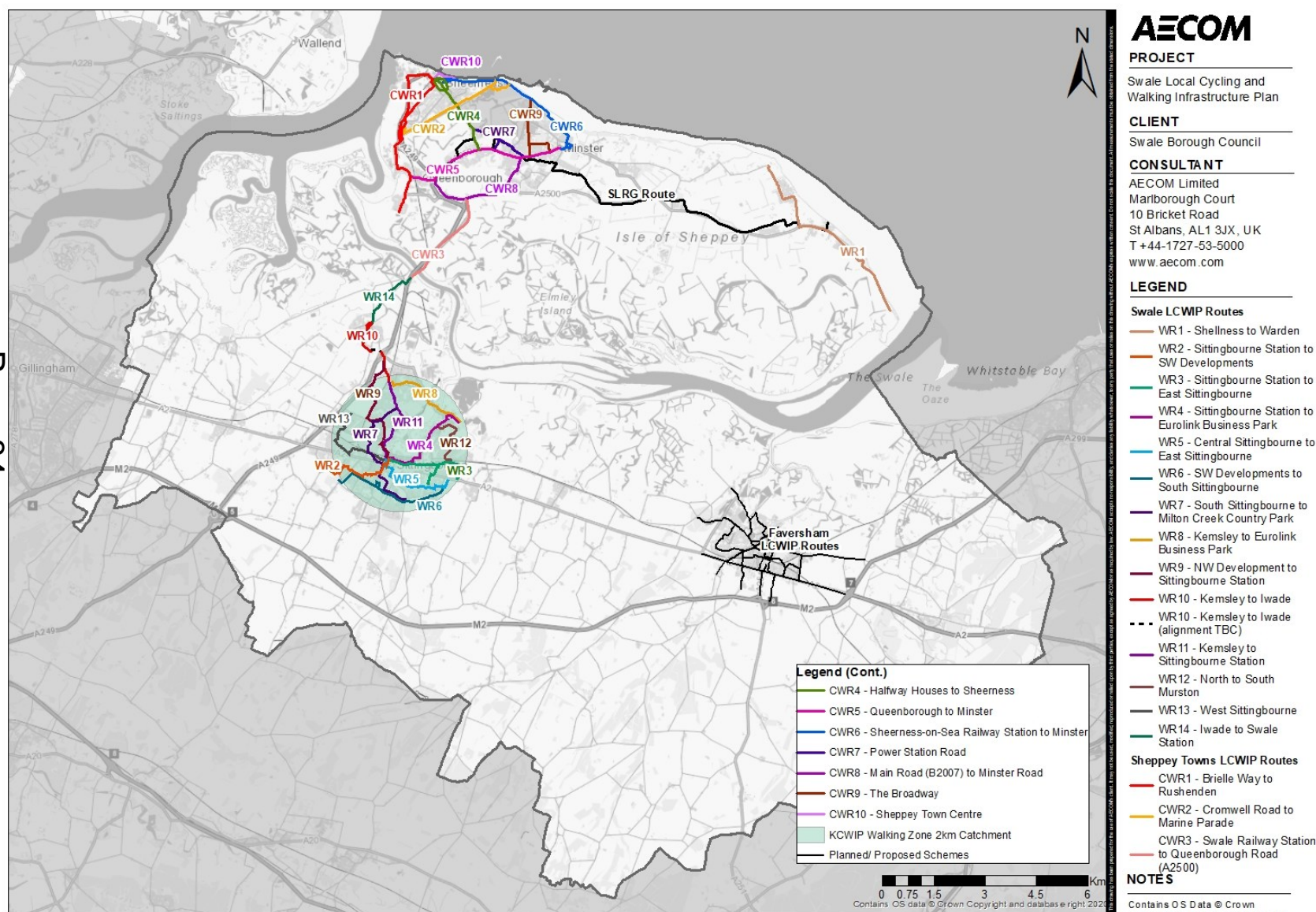


Figure 14: Identified Walking and Wheeling Network for Public Engagement

Next Steps...

At the next stage, public consultation will be conducted to ensure the proposed networks address the needs and concerns of local residents, the future users.

For the realistic and practical implementation of the plan, the walking and cycling routes will be assessed and prioritised based on policy, strategy, deliverability and financial priorities. The result of this process will suggest which routes should be prioritised in order to achieve the most benefits.





Appendix A - Network Planning for Cycling - Methodology

Network Planning for Cycling

Key Origins and Destinations

To identify the potential demand across the proposed cycling network, key origin and destination points across Swale were mapped. This mapping was based on data collected during the Information Gathering stage, specifically the locations of key trip attractors and generators.

Desire Lines

Desire lines in this context are **indicative links** between origin and destination clusters that reflect the “desire” of the local population to travel between two locations. These desire lines do not connect to existing infrastructure, nor do they reflect the proposed routes.

The identification of desire lines was an **iterative process** undertaken overlaying data from the **Propensity to Cycle Tool (PCT)**, 2011 Census **Travel to Work data**, and **traffic model (VISUM)** 2019 flows. Additional cross-border desire lines which were identified as significant to the county-wide network (KCWIP) as part of the analysis were also included in the desire line identification.

Desire Line Classification

The relative importance of each desire line to the wider network needs to be understood to assess the potential future number of cyclists they could serve. Desire lines were classified as based on the following characteristics:

- **Primary:** High flows of cyclists are forecast along desire lines that link large residential areas to trip attractors such as a town or city centre.
- **Secondary:** Medium flows of cyclists are forecast along desire lines that link to trip attractors such as schools, colleges, and employment sites.
- **Local:** Lower flows of cyclists are forecast along desire lines that cater for local cycle trips, often providing links to primary or secondary desire lines.

As can be seen from the above desire line classifications, the desire line classification process is deeply rooted in demand. Whilst demand is an important facet of desire lines, the geographic scope and objectives of this LCWIP required the consideration of other factors to ensure an even balance between urban and rural areas as well as focusing on connecting smaller towns into larger settlements.

Classified Desire Lines

As shown in Figure 1, the outputs of the desire line classification process show **Primary desire lines between Sittingbourne and Faversham and connecting to the Isle of Sheppey**. There are also several Primary desire lines connecting the towns on Sheppey, as well as rural towns outside of Sittingbourne. The local desire lines, in turn, represent longer routes that connect to the primary desire lines.

Desire Lines for Route Selection

Figure 2 demonstrates the desire lines taken forward for route selection. Overlapping desire lines or those with similar origins and destinations were merged to create a network of cycling routes which reflect the key movement corridors highlighted by the desire lines.

As shown, cross-border KCWIP desire lines were included, along with the highest scoring desire lines, to ensure the alignment with the county-wide network.

Network Planning for Cycling

Desire lines in Faversham and the Isle of Sheppey were excluded from selection since they are part of the Faversham LCWIP and Sheppey Towns LCWIP respectively.

The focus of the proposed cycling network was on **Sittingbourne** and the east-west and north-south movements connecting the town.

The **desire lines taken forward for route selection represent current priorities for SBC**. Other desire lines are not discarded for future analysis but have not been identified as primary at this stage. This prioritisation is subject to further updates based on changes in local/national policy or progress towards the identified priority desire lines.

Route Selection Process

Identifying routes for inclusion in the Swale LCWIP was an iterative process and was one of the most important elements of the LCWIP process. Unlike the desire lines, these routes connect to existing cycling infrastructure, support existing and future cycle demand, and accommodate the forecast needs of the local community in moving between specific areas. At the same time, they achieve the **core design outcomes** of being coherent, direct, safe, comfortable, and attractive.

The routes emerged from comprehensive data analysis and were informed by various data sources as detailed in previous sections of this report. Alignment decisions considered the **existing and forthcoming active travel** network, **local conditions** such as gradient, terrain and **cycling accessibility** were also factored into the route selection.

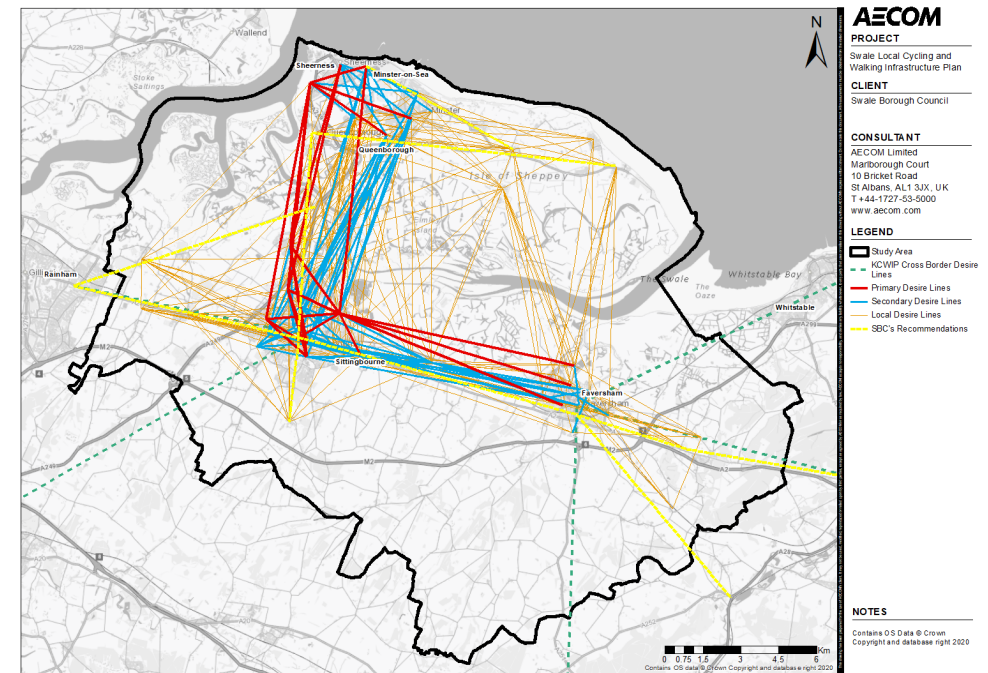


Figure 1: Classified Desire Lines

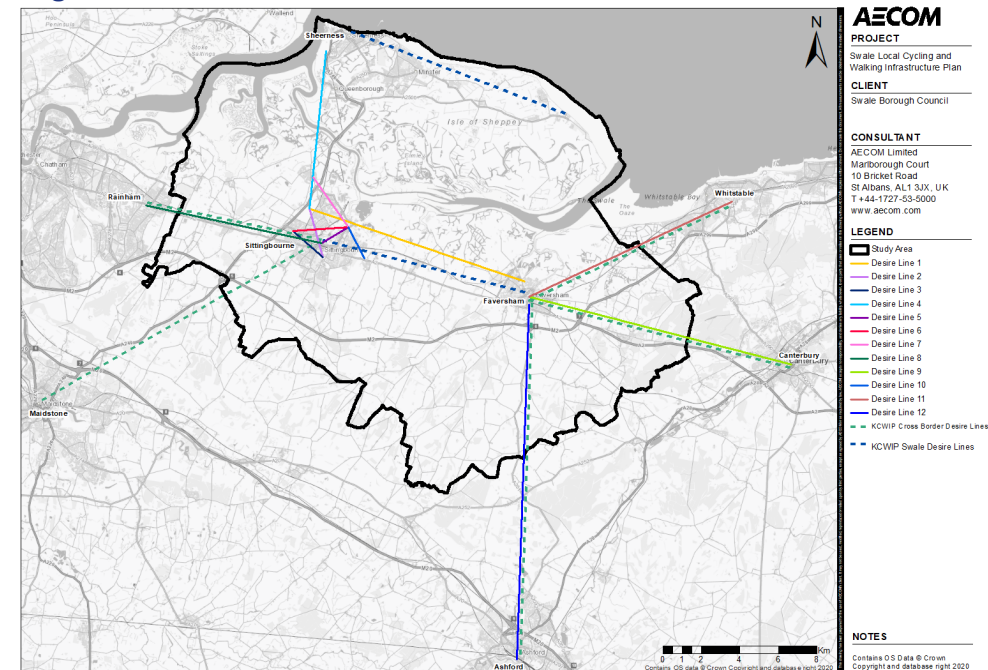


Figure 2: Primary Desire Lines for Route Selection

Network Planning for Cycling

Stakeholder Engagement

Swale LCWIP

The identified cycling network, shown was presented to local stakeholders in a **stakeholder engagement** session held in February 2024. The meeting provided a platform to gather the stakeholders' opinion on the identified network.

Overall, the stakeholders welcomed the identified cycling routes and used their local knowledge to make some suggestions such as altering the alignment of proposed routes to make them more attractive to local residents and receive longer-term support.

The key outcome of this meeting was to **ensure the routes are direct**, where possible **avoiding car-dominated or fast roads**.

Sheppey Towns LCWIP

A hybrid stakeholder engagement session was conducted through both **in-person and online workshops** on the 18th of October 2023 (as shown in Figure 3). Stakeholders and Council officers provided direct comments on the draft network plans. The window for comment remained active via the online Miro board until the 27th of October 2023, allowing for further stakeholder feedback.

The consultation attracted:

- 23 visitors including representatives from Kent County Council, Parish Councils, Sheppey Light Railway Greenway Group, and other local groups.
- 71 contributions: 69 in-person stakeholder comments and 2 online Miro board inputs.

The consultation highlighted several key issues preventing people from walking or cycling in the proposed area including the **accessibility issues around the coastal path** and **Neptune steps**.

Following the identification of the network, a series of active travel audits took place on 30th November 2023. The 40km network was cycled and audited by several trained auditors from WSP and a representative from Swale Borough Council.

The ATE Route Check Microsoft Form was completed during the audit, with photos being taken continuously throughout. The results of the audit were downloaded and analysed in Microsoft Excel to determine the existing level of infrastructure feasibility, to inform the next concept planning stage.

The integrated Swale LCWIP cycling network is presented for each of the four study areas, as follows:

- **Sittingbourne** - identified as part of this analysis and presented in **Appendix X**
- **Faversham** - identified as part of Faversham LCWIP and presented in **Appendix X**.
- **Sheppey Towns** - identified as part of draft Sheppey Towns LCWIP and presented in **Appendix X**.
- **Rural Swale** - identified as part of this analysis and presented in **Appendix X**.



Figure 3: Stakeholder Engagement Workshop Undertaken by WSP on 18th October 2023

Appendix B - Network Planning for Walking and Wheeling - Methodology

Network Planning for Walking & Wheeling

Walking and Wheeling Zones

Developing the walking and wheeling network involved mapping the key trip generators. This stage focuses on the key sites which generate **significant pedestrian demand** among the high number of destinations across Swale. These included:

- Education sites with over 500 pupils
- Town centres
- Healthcare sites
- Retail sites
- Employment sites
- Community/ Leisure sites
- Key transport interchanges
- Planned/ committed developments

After identifying and mapping the key trip generators, **walking isochrones** representing an approximate 15-minute walk were drawn. Overlapping isochrones were then used to identify areas with the **highest density** of key destinations. **Core walking zones** (CWZ) (400m buffers) and **walking zones** (2km buffers) were drawn around areas with multiple overlapping key destinations. This analysis is shown in Figure 1.

As Figure 2 illustrates, walking and wheeling zones were identified in Faversham, Sittingbourne, and on the Isle of Sheppey. Only the zones in Sittingbourne and Leysdown were taken forward to the route selection process because of the completed/ in progress LCWIPs in Swale.

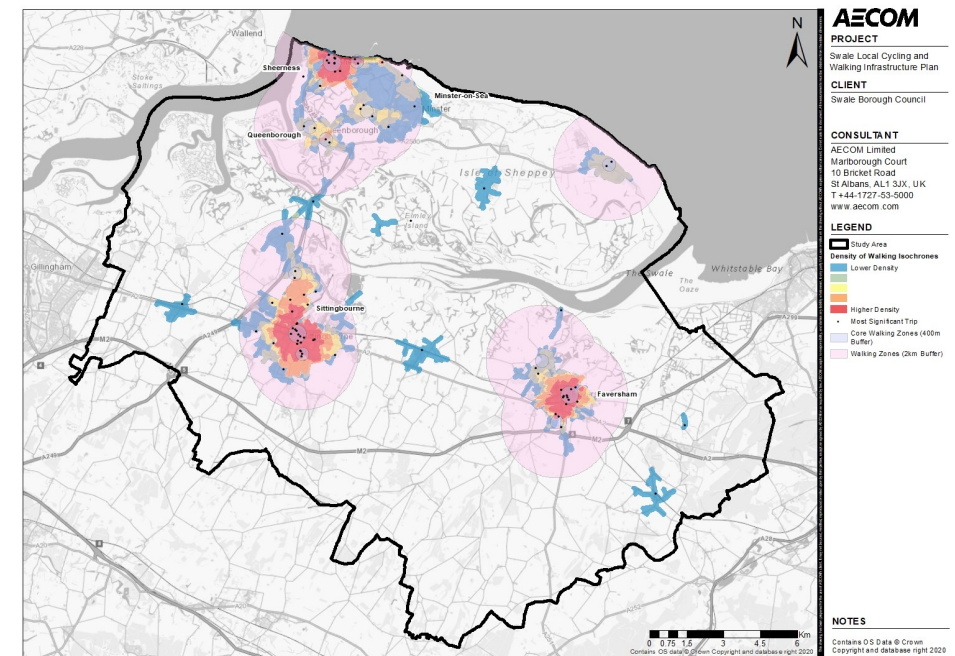


Figure 1: Density of Key Trip Attractors - Walking Isochrones

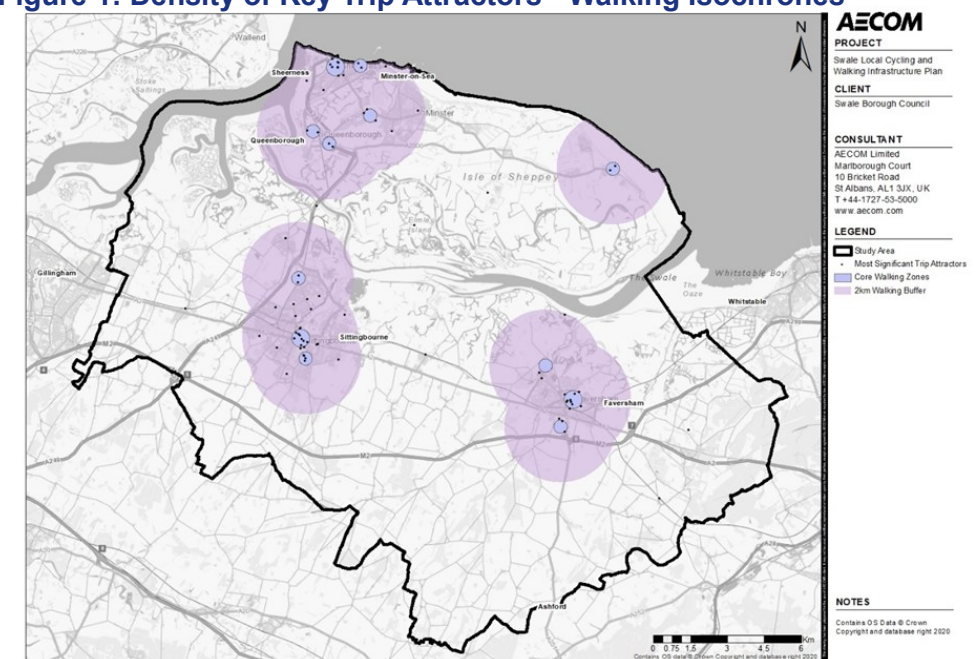


Figure 2: Identified Walking and Wheeling Zones

Network Planning for Walking & Wheeling

Route Selection

Converting the CWZs into routes for inclusion in LCWIPs is an iterative process and, along with the route selection for cycling routes, is one of the most important elements of the LCWIP process. The objective was to identify walking and wheeling routes that meet **core design outcomes** to create a **coherent, direct, safe, comfortable, and attractive** walking and wheeling network and which connect to the existing network and key destinations.

The identified CWZs and the existing walking and wheeling infrastructure serving them within the 2km buffer zones, were taken into consideration to identify walking and wheeling routes that would **bridge gaps** in the existing network and create a **continuous and seamless** walking and wheeling **network**.

The routes were developed from data analysis conducted up to this point, informed by various data sources, such as the existing active travel network and Google Maps data. They also aligned with Kent County Council's Public Rights of Way (PRoW) Improvement Plan.

Stakeholder Engagement

Swale LCWIP

The identified walking and wheeling network was presented to local stakeholders to gather feedback on the identified network.

Overall, the stakeholders welcomed the identified walking and wheeling routes and used their local knowledge to make some suggestions such as altering the alignment of proposed routes or ensuring the proposed improvements contribute to creating safer, more direct walking and wheeling routes.

Sheppey Towns LCWIP

The stakeholder engagement which was undertaken for the Sheppey Towns LCWIP was detailed on Page 16 of this report.

The integrated Swale LCWIP walking and wheeling network is presented for each of the four study areas, as follows:

- **Sittingbourne** - identified as part of this analysis and presented in **Appendix X**.
- **Faversham** - identified as part of Faversham LCWIP and presented in **Appendix X**
- **Sheppey Towns** - identified as part of

draft Sheppey Towns LCWIP and presented in **Appendix X**.

- **Rural Swale** - there were no routes identified in rural Swale.

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Swale Local Cycling and Walking Infrastructure Plan

Swale Borough Council

Quality information

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01

Introduction

Introduction



Active travel is becoming increasingly important as challenges around climate change become more pressing and the demand for active travel solutions grows. Investment in cycling and walking can have wider positive impacts on people and places, making roads quieter and safer, improving air quality, improving physical and mental wellbeing and creating attractive places for people to travel within and between.

In 2017, the Department for Transport (DfT) published their first Cycling and Walking Investment Strategy (CWIS). The aim of this was to encourage cycling and walking to become a key mode of travel for shorter journeys or as a stage of a longer journey by delivering better safety, mobility and streets.

Alongside the CWIS, the DfT published practical, strategic guidance on developing Local Cycling and Walking Infrastructure Plans (LCWIPs) for local bodies.

LCWIPs outline a “strategic approach to identifying cycling and walking improvements required at a local level” in order to both encourage and facilitate the modal shift away from motorised vehicles to more active modes, transforming areas in ways which support active travel, reduce congestion, support local economies and improve physical and mental health in line with sustainable visions at a local to a national level.

The stages of the LCWIP process are:

Stage 1 – Determining Scope: define the geographic scope of the LCWIP and establish governance and preparation arrangements.

Stage 2 – Gathering Information: collect data on current cycling and walking patterns, identify potential new routes, assess existing conditions, and identify barriers. Review relevant transportation and land use policies.

Stage 3 – Network Planning for Cycling: identify starting and ending points for cycling journeys, create a network of routes based on these points, and determine the necessary improvements for cycling infrastructure.

Stage 4 – Network Planning for Walking: identify key destinations, core walking areas, assess existing pedestrian infrastructure, and determine required improvements for walking.

Stage 5 – Prioritising Improvements: prioritize the identified improvements to create a phased program for future investments in cycling and walking infrastructure.

Stage 6 – Integration and Application: integrate the LCWIP outputs into local planning, transportation policies, strategies, and implementation plans to ensure that cycling and walking

considerations are incorporated into broader urban and transportation planning efforts.

This report covers Stages 2, 3 and 4 of the LCWIP process described above.

The study area covers the district of Swale, building on a number of active travel schemes and stakeholder and public engagement undertaken to date, such as the Faversham LCWIP (issued January 2022) and the Kent Cycling and Walking Infrastructure Plan (KCWIP).

Kent County Council (KCC) has undertaken a county-wide LCWIP, (the KCWIP) which aims to identify a strategic network of walking and cycling routes across the county and is expected to be published in 2025.

There are three proposed KCWIP cycle routes which begin/ end in Swale: between Sheerness and Leysdown, Sittingbourne and Faversham and one route from Maidstone to Sittingbourne. These routes were identified as priority routes through the KCWIP assessment.

Alongside this Swale LCWIP, a Sheppey Towns LCWIP was developed, which identified active travel routes and proposed improvements. Prior to public consultation, the Sheppey Towns LCWIP was merged into the Swale LCWIP in order to streamline these two documents and put forward a coherent network of active travel routes

across the Borough. Therefore, Chapters 2 - 4 of this report focus on the Swale LCWIP development and Chapter 5 discusses the inclusion of the Sheppey Towns LCWIP into the Swale LCWIP.

This report is structured as follows:

- Introduction
- Data Collection
- Network Planning for Cycling
- Network Planning for Walking
- Sheppey Towns LCWIP
- Summary

This LCWIP is designed to enable a long-term approach to developing local cycling, walking and wheeling networks over a 10-year period. It is envisaged that the LCWIP will be reviewed and updated to reflect progress made towards implementation or to reflect changes in local policies or strategies, for instance.

02

Stage 2: Data Collection

Stage 2: Data Collection

Study Area

Swale is one of 12 districts in Kent, it is bounded by Medway, Canterbury, Ashford and Maidstone. The LCWIP study area is covering the whole of Swale.

Given the importance of encompassing both rural and urban areas as well as connections between key settlement clusters, additional smaller-scale study areas have been identified within Swale (see Figure 2-1): Sittingbourne, Faversham, Sheppey towns and rural Swale. These four key areas will be represented in subsequent stages to draw out the baseline conditions alongside the district-wide scale.

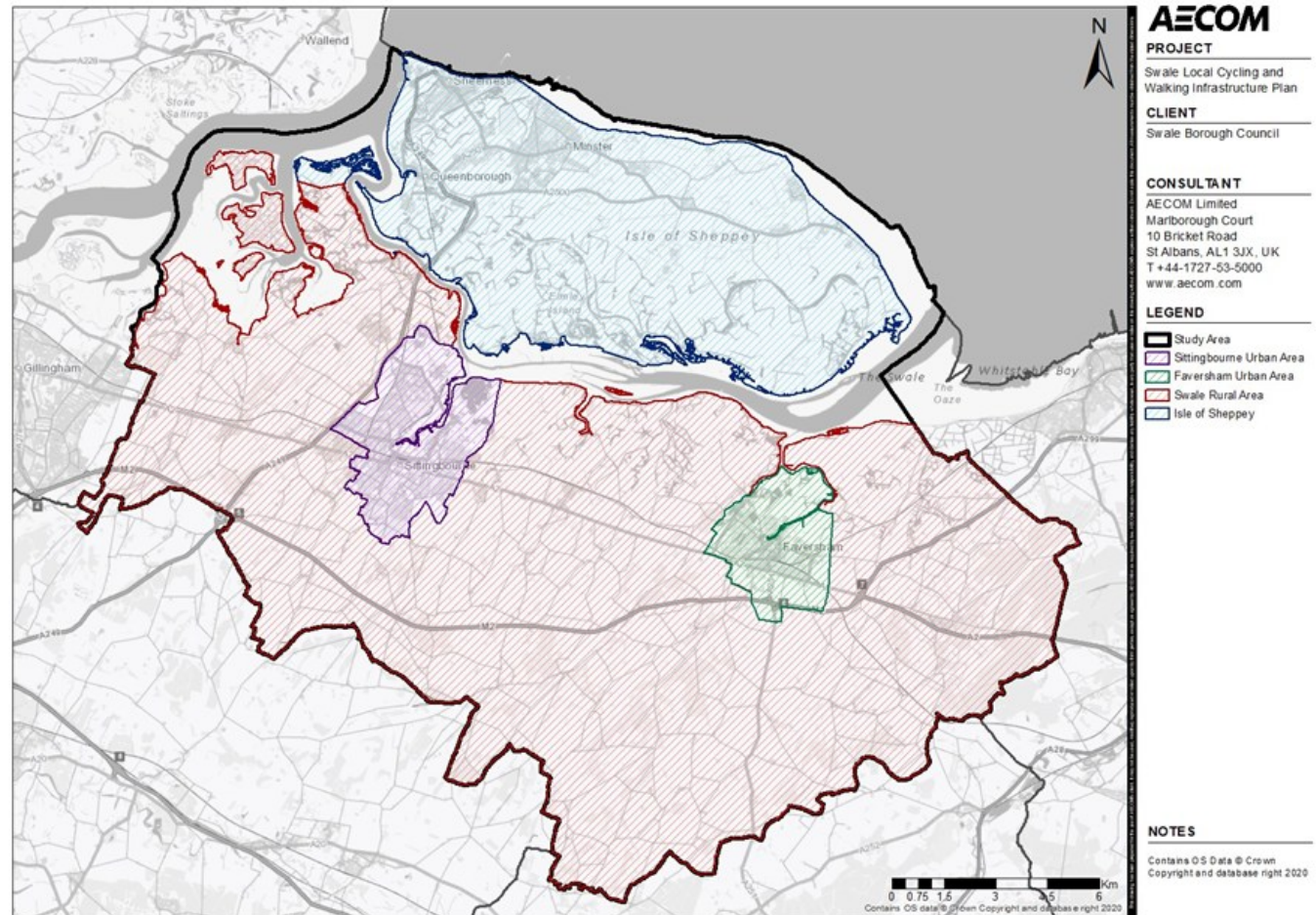


Figure 2-1: Swale LCWIP Study Area

Demographics

According to 2021 Census, the population in Swale is around 151,700. Whilst the population in Swale is growing (11.7% growth between the 2011 and 2021 Censuses) by a greater percentage than the overall population of the South-East (7.5%) and England (6.6%), it is among the lowest 40% for population density across all local authorities in England [1]. According to the 2020 mid-year population estimates, 30% of Swale's population resided in rural areas, which is the 6th highest percentage in Kent [2].

Swale is comprised of 24 wards, the populations of which are displayed in Table 2-1 below by area and urban-rural classification [3].

Table 2-1: 2020 Mid-year Ward Level Population Estimates (MYPE)

Area	Ward	2020 MYPE*	2020 MYPE Density	Urban-Rural Classification
Faversham Urban Area	Abbey	5,360	27.95	Urban city and town
	Priory	2,900	7.95	Urban city and town
	St Ann's	5,630	49.88	Urban city and town
	Watling	6,320	14.20	Urban city and town
Sittingbourne Urban Area	Chalkwell	3,450	36.02	Urban city and town
	Homewood	6,390	46.37	Urban city and town
	Kemsley	7,140	18.40	Urban city and town
	Milton Regis	6,290	34.08	Urban city and town
	Murston	7,040	17.36	Urban city and town
	Roman	6,880	51.29	Urban city and town
	The Meads	4,120	39.59	Urban city and town
	Woodstock	6,130	29.03	Urban city and town
	Minster Cliffs	7,770	15.15	Urban city and town
Isle of Sheppey	Queenborough and Halfway	8,170	7.66	Urban city and town
	Sheerness	13,480	24.54	Urban city and town
	Sheppey Central	9,120	3.78	Urban city and town
	Sheppey East	7,250	1.59	Rural village and dispersed
Swale Rural Area	Bobbing, Iwade and Lower Halstow	6,220	2.58	Rural town and fringe
	Borden and Grove Park	6,450	7.79	Rural village and dispersed
	Boughton and Courtenay	6,720	1.05	Rural village and dispersed
	East Downs	2,720	0.45	Rural village and dispersed
	Hartlip, Newington and Upchurch	6,290	2.47	Rural town and fringe
	Teynham and Lynstead	6,330	1.32	Rural town and fringe
	West Downs	2,880	1.16	Rural village and dispersed

*Ward estimates have been individually rounded to the nearest 10.

Source: Kent County Council, 2021

[1] Census 2021, <https://www.ons.gov.uk/visualisations/censusareachanges/E07000113/>

[2] Kent County Council, 2021, https://www.kent.gov.uk/_data/assets/pdf_file/0018/8145/Mid-year-population-estimates-ward-level-population.pdf

[3] Ibid

Population Density

Figure 2-2 to Figure 2-6 illustrate the population density across all of Swale, as well as in the four core areas across Swale.

The population density in Swale almost exclusively agglomerates in Faversham, Sittingbourne, Minster-on-Sea and Sheerness. Population density across Swale reaches 17,896 people per km. The Lower layer Super Output Areas (LSOA) with the highest population is in Sheerness. Except for pockets of higher density in Sittingbourne, Faversham and the Isle of Sheppey, the maximum population density in rural Swale is 3,112 people per km.

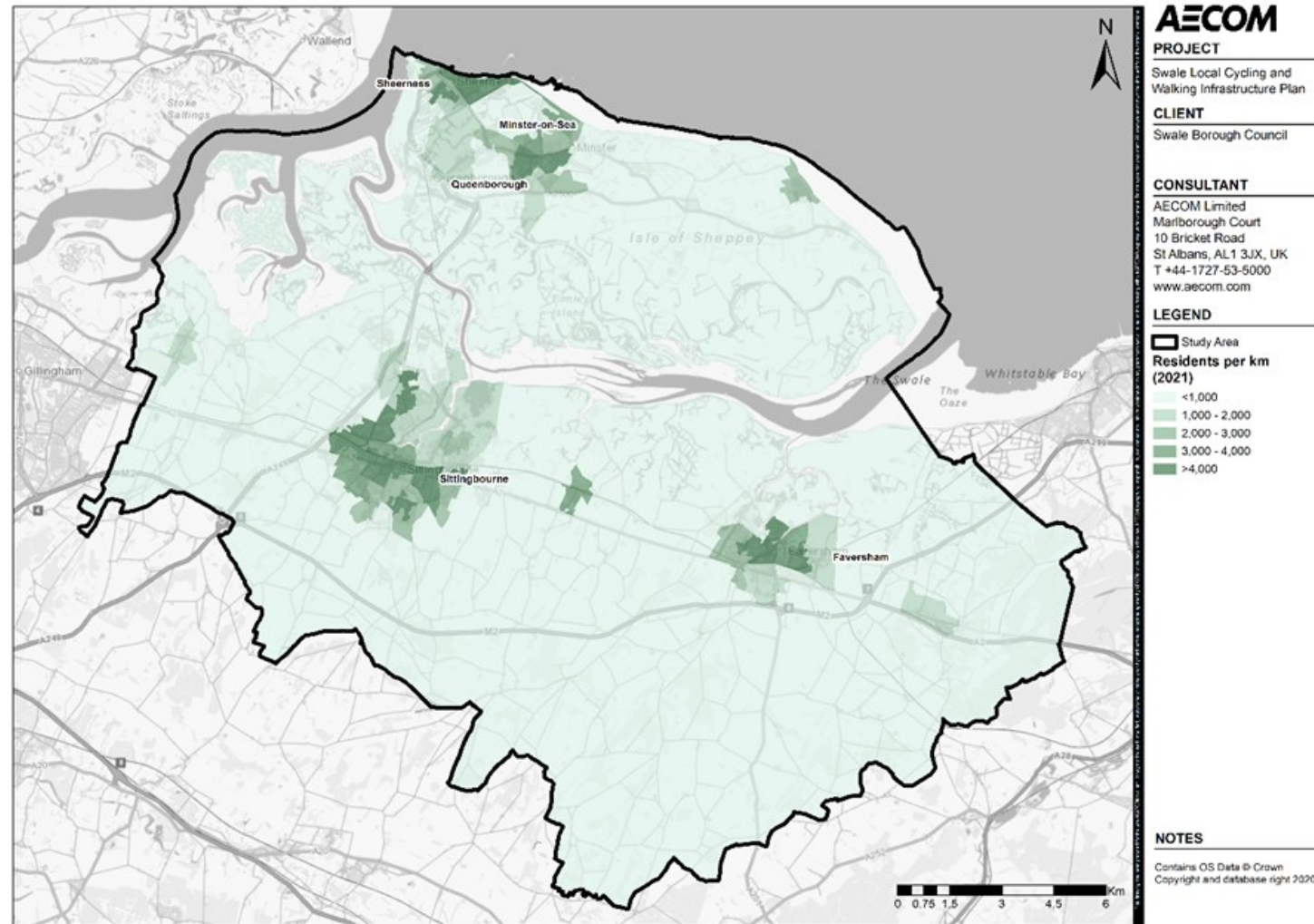


Figure 2-2: Population Density Across Swale (2021)

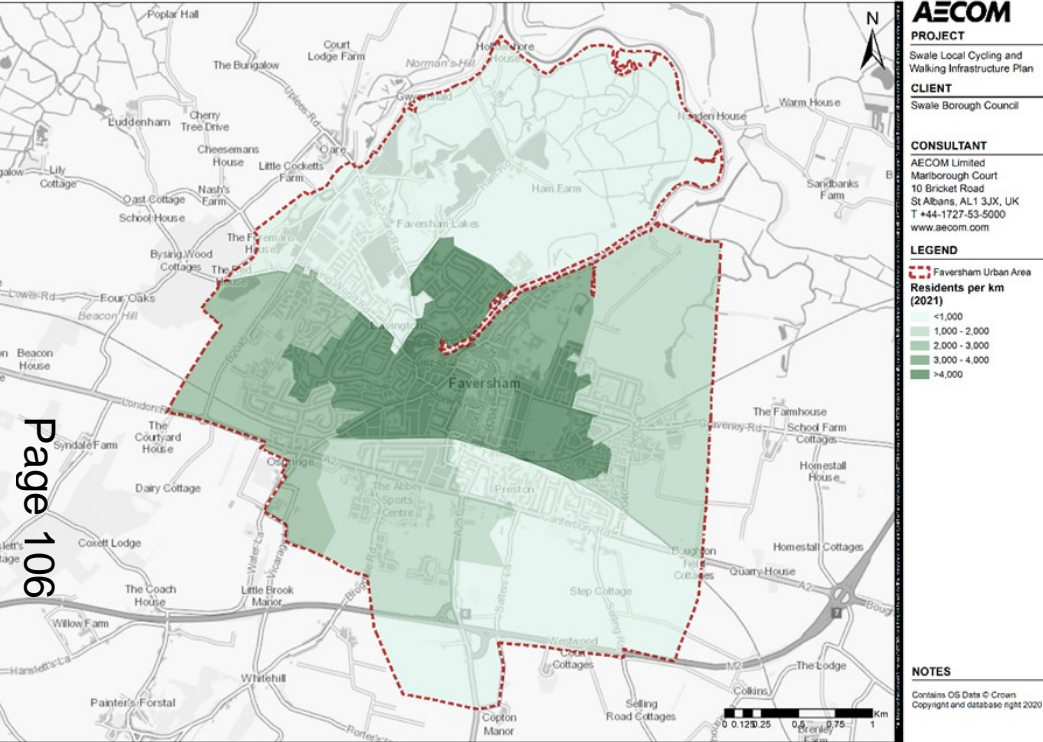


Figure 2-3: Population Density- Faversham

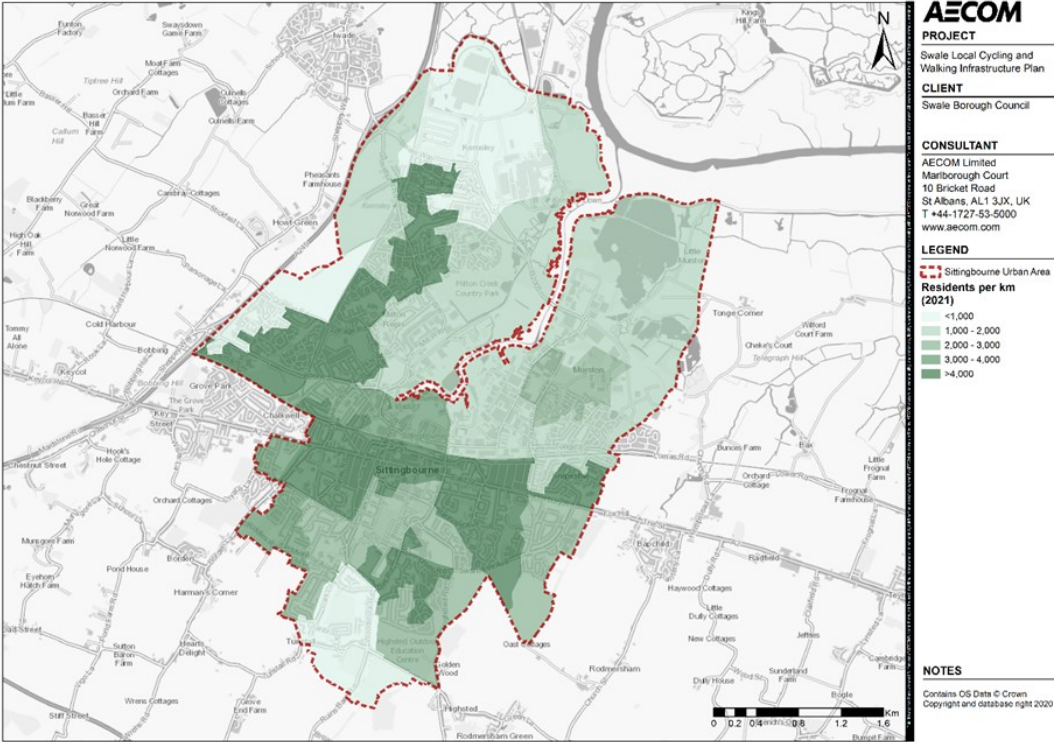


Figure 2-4: Population Density- Sittingbourne

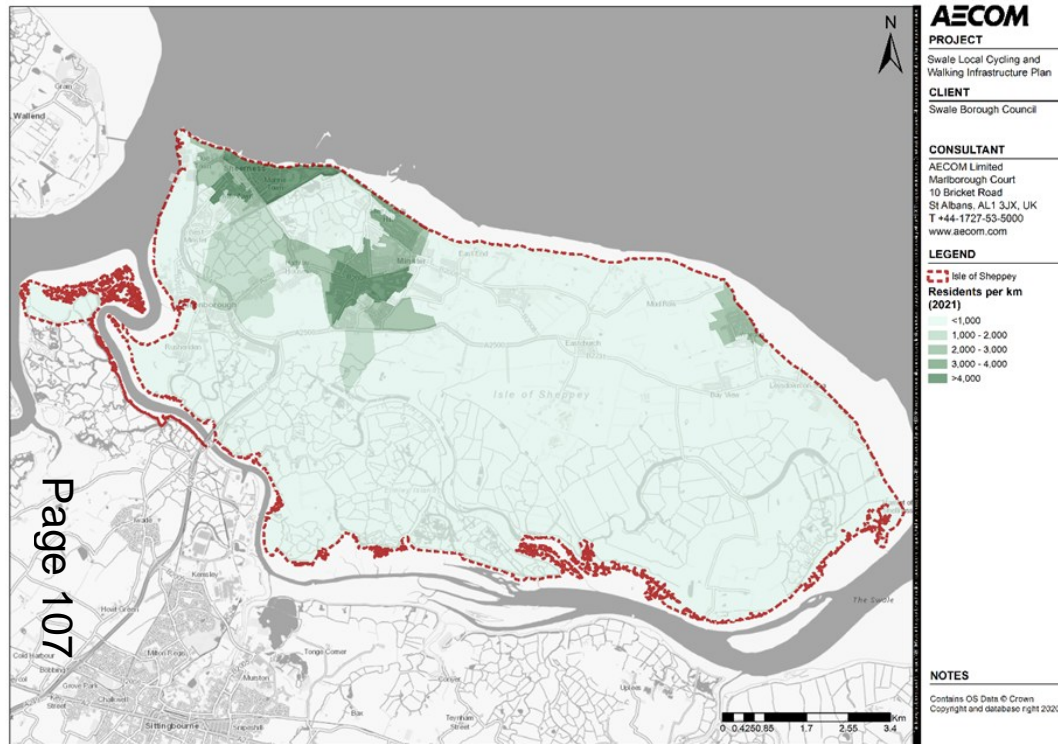


Figure 2-5: Population Density- Isle of Sheppey

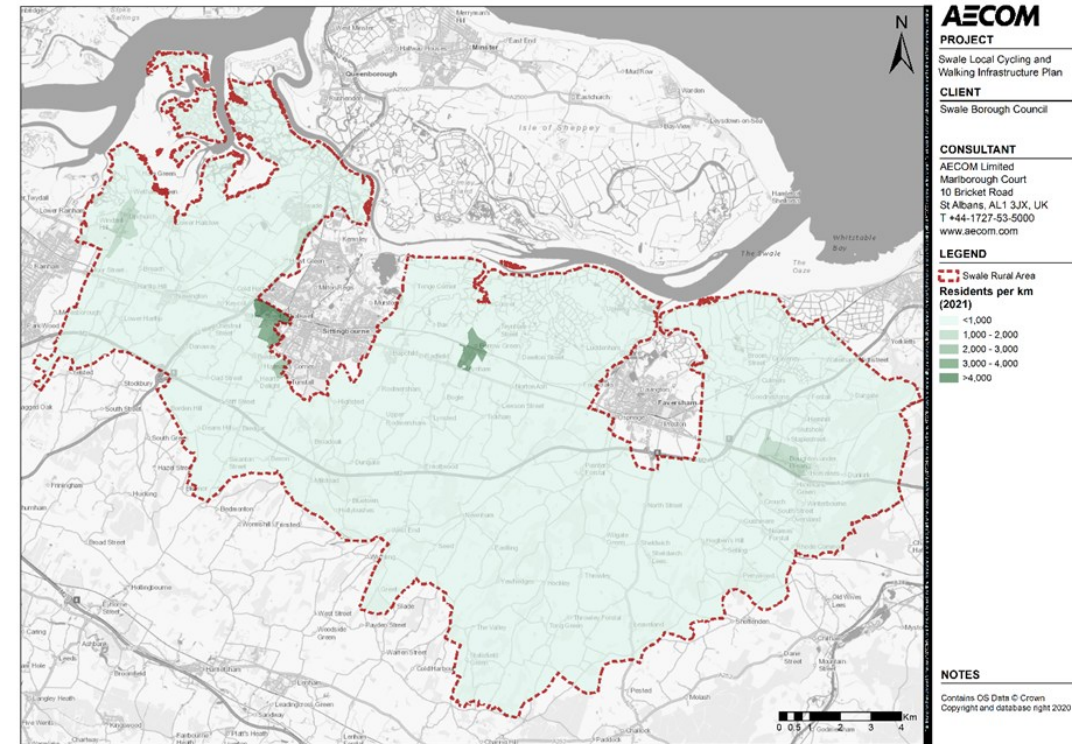


Figure 2-6: Population Density- Rural Swale

Employment Density

Employment density in Swale is based on the Business Register and Employment Survey (2021) and is illustrated in Figure 2-7. It can be seen that among Sittingbourne, Faversham and Sheerness, Sittingbourne has the highest employment density – between 51 and 101 employees per hectare. Just outside of Sittingbourne, employment density is largely between 8 and 20 employees per hectare. The vast majority of Swale outside key towns has fewer than 7 employees per hectare. There are clusters of higher employment density to the east and west of Swale in Whitstable and Gillingham.

Figure 2-8 to Figure 2-11 illustrate the employment density in the settlement areas of Sittingbourne, Faversham, Isle of Sheppey and rural Swale in more detail. Similar to population density, rural Swale and the Isle of Sheppey have extremely low numbers of employees per hectare given the majority of the area is comprised of rural settlements.

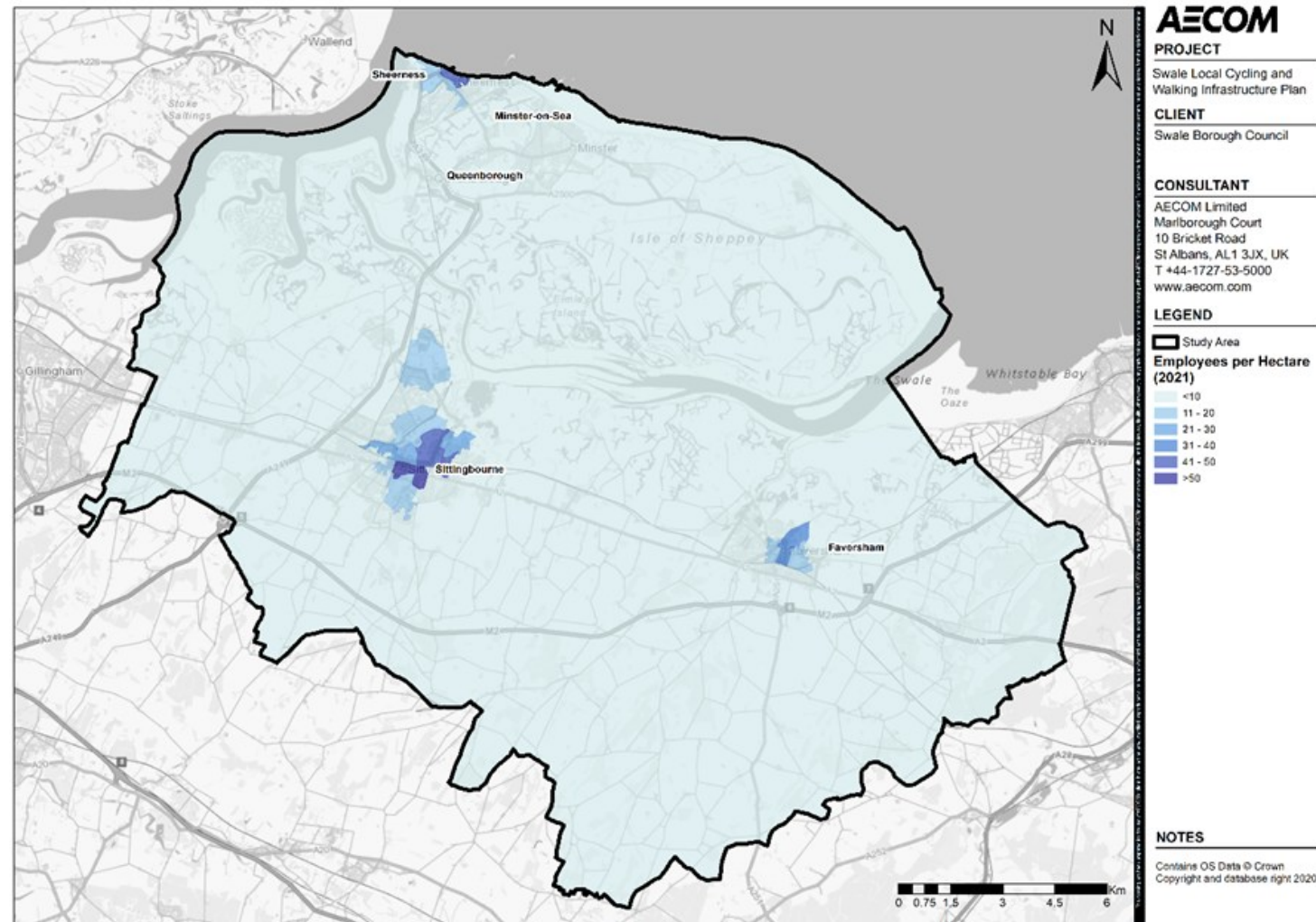


Figure 2-7: Employment Density Across Swale (2021)

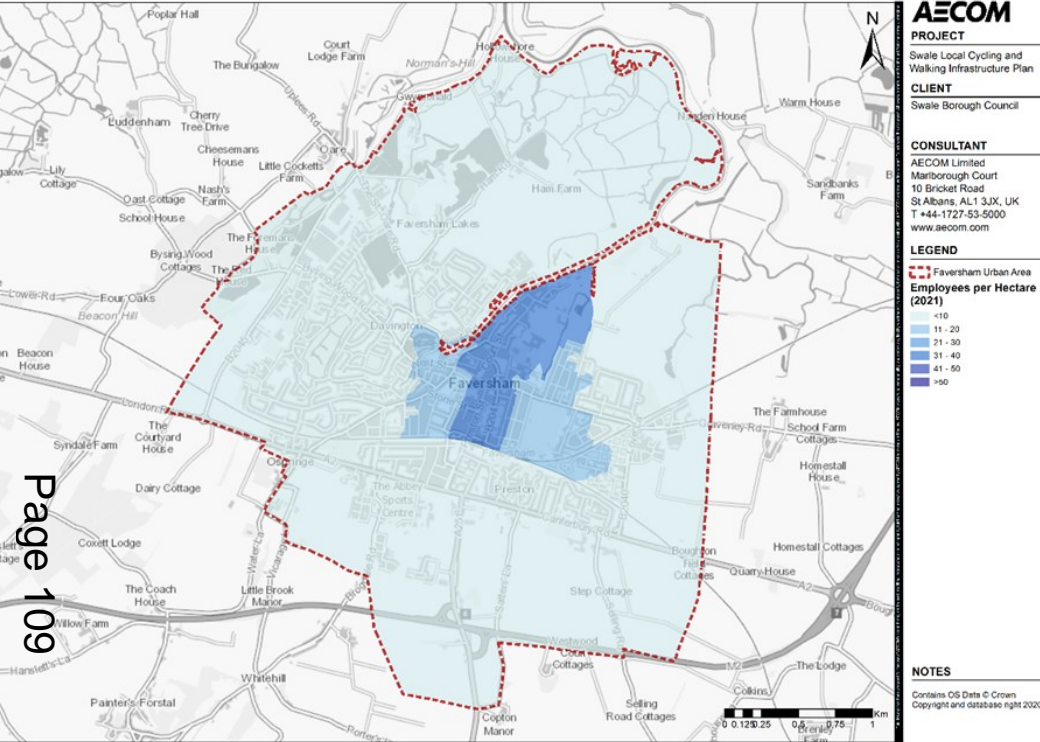


Figure 2-8: Employment Density- Faversham

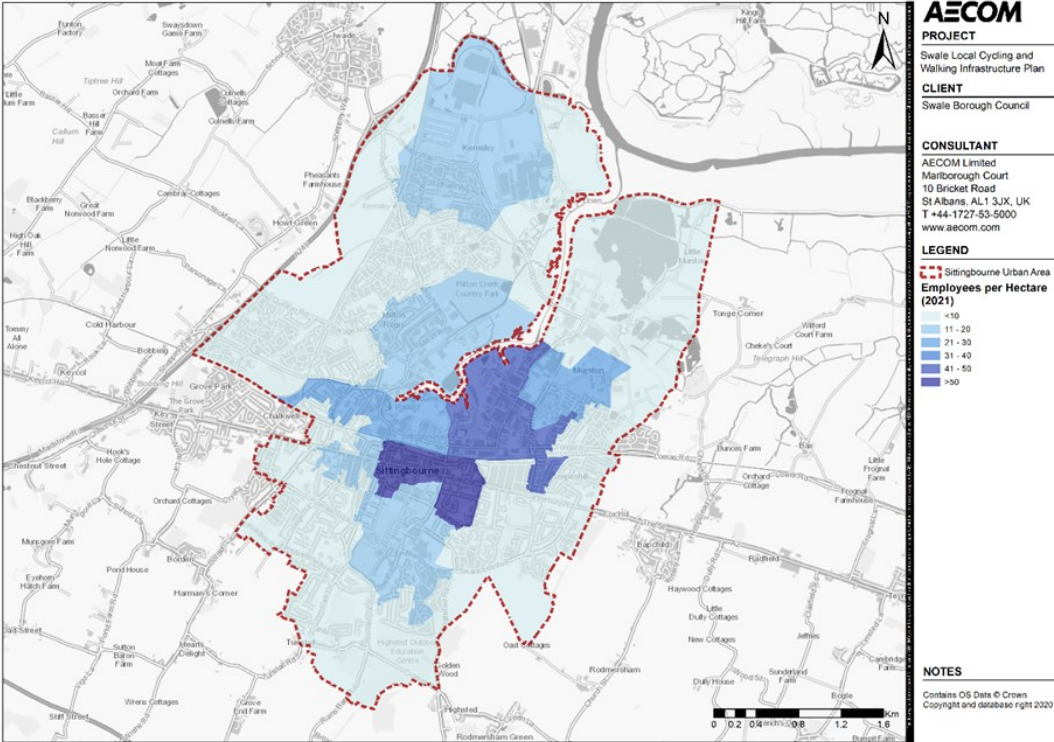


Figure 2-9 Employment Density- Sittingbourne

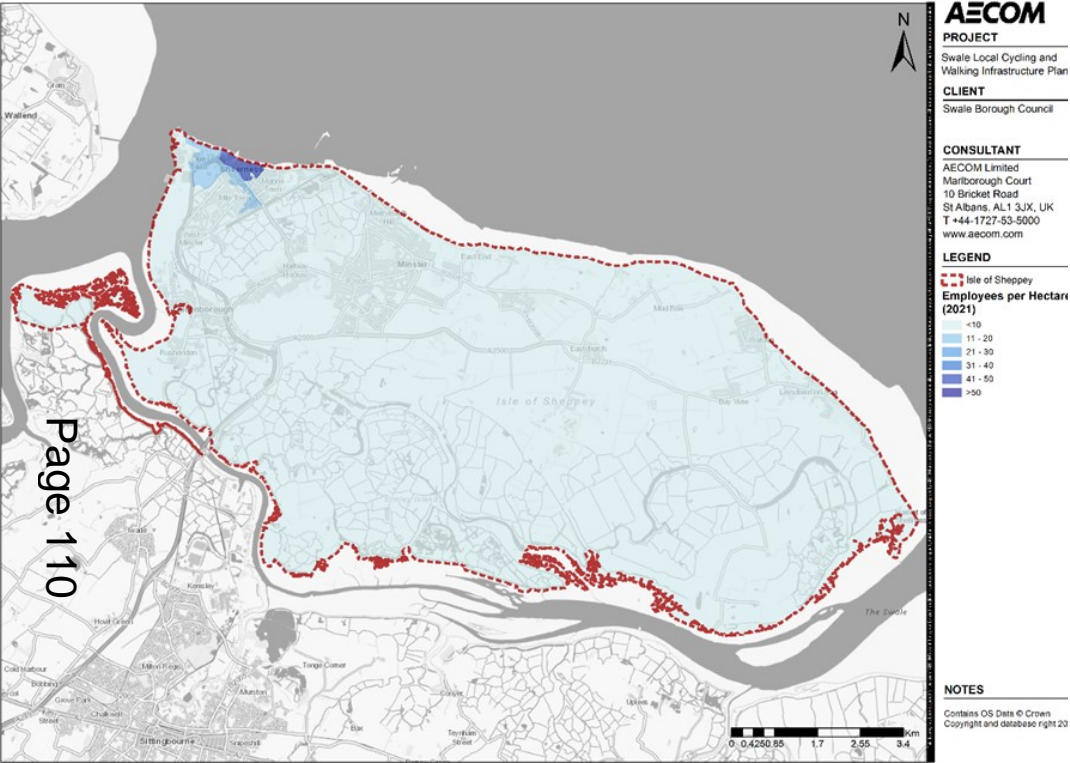


Figure 2-10: Employment Density - Isle of Sheppey

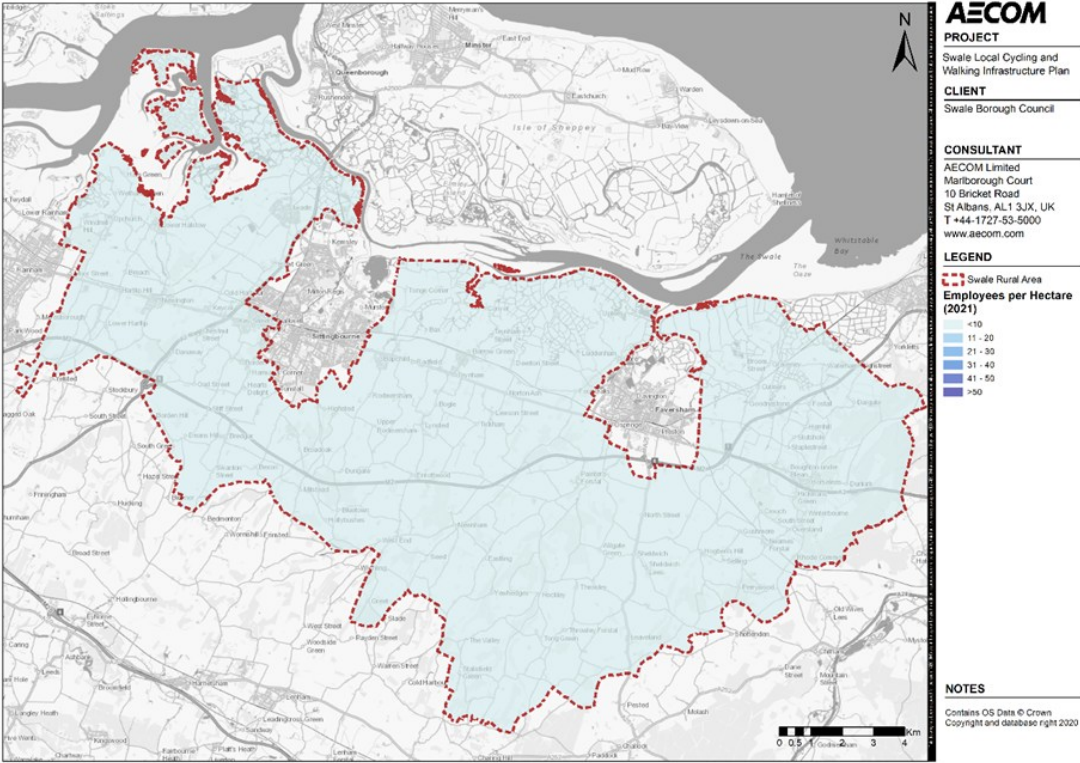


Figure 2-11: Employment Density - Rural Swale

Car Availability

Figure 2-12 illustrates the car or van availability across Swale. Across rural Swale, the average number of cars or vans per household is above 1.5 whereas within urban areas, in Sheerness, Sittingbourne and Faversham, the car or van availability is less than 1. Across Swale, the car or van availability is consistently higher than the average for the South East England (0.6 cars or vans per household [4]).

Figure 2-13 to Figure 2-16 illustrate the car or van availability across the four study areas in Swale. When comparing the car or van availability of Sittingbourne and Faversham to rural Swale and the Isle of Sheppey, it becomes clear that the spatial redistribution of people towards urban areas results in pockets of low car dependency in towns and higher car dependency in rural areas. In more urban areas, there is typically more mode choice in terms of active travel infrastructure and public transport, whereas rural areas typically present a greater challenge in encouraging mode shift away from private vehicles.

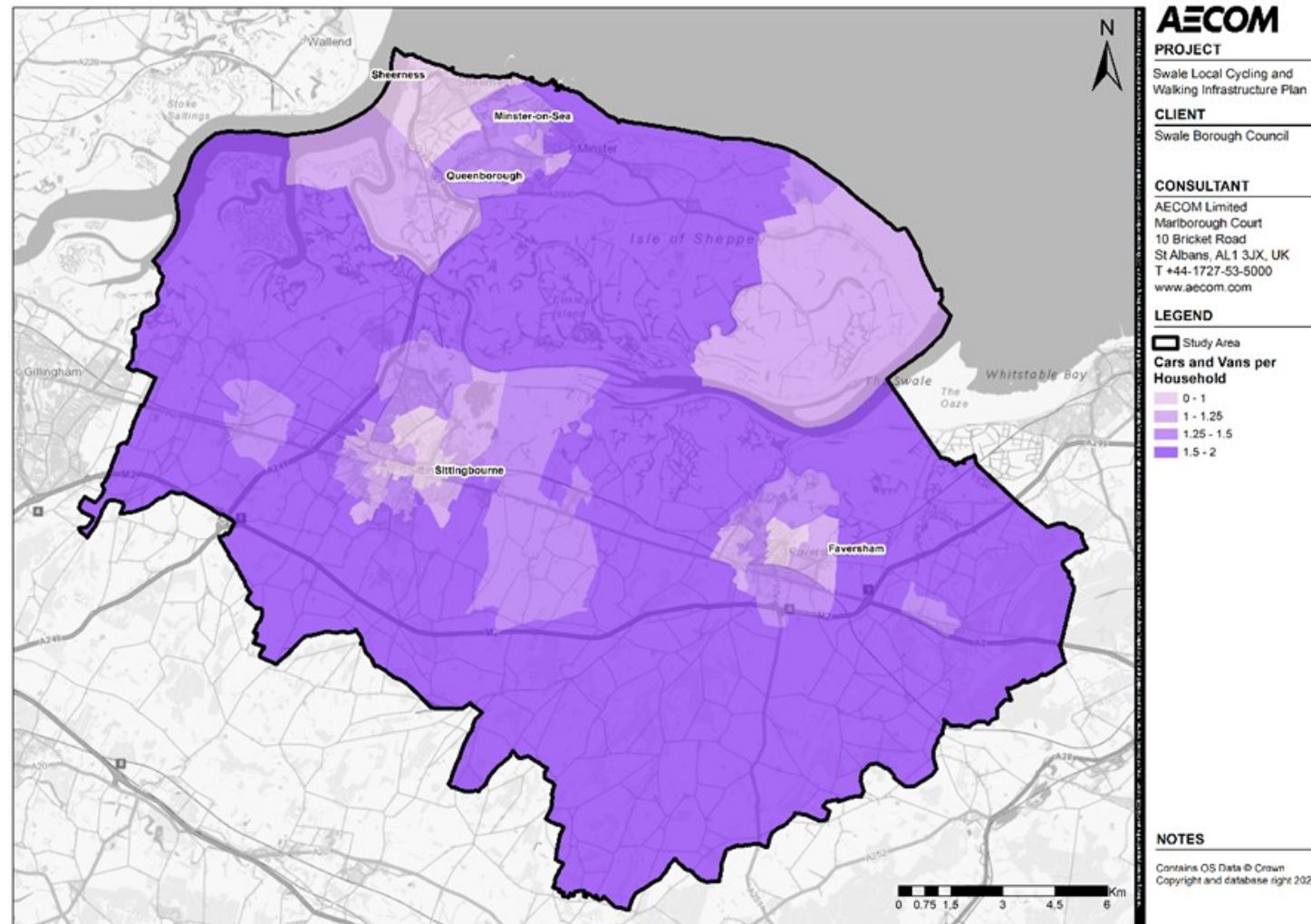


Figure 2-12 Car or Van Availability Across Swale

[4] <https://www.gov.uk/government/statistics/national-travel-survey-2019>

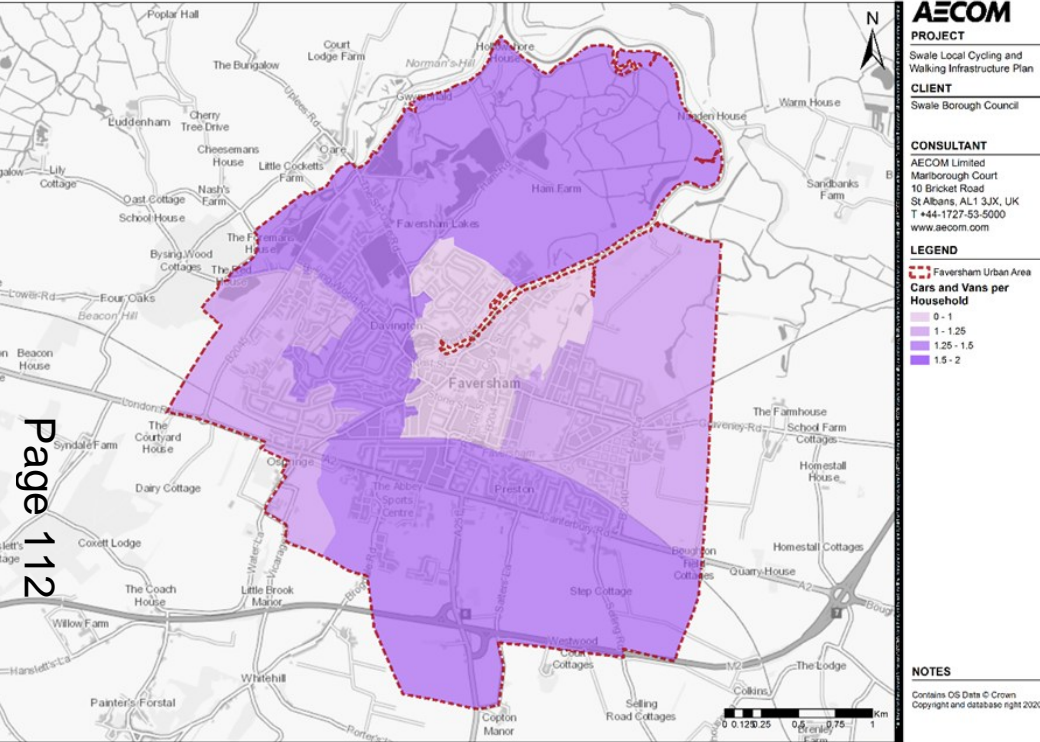


Figure 2-13: Car or Van Availability- Faversham

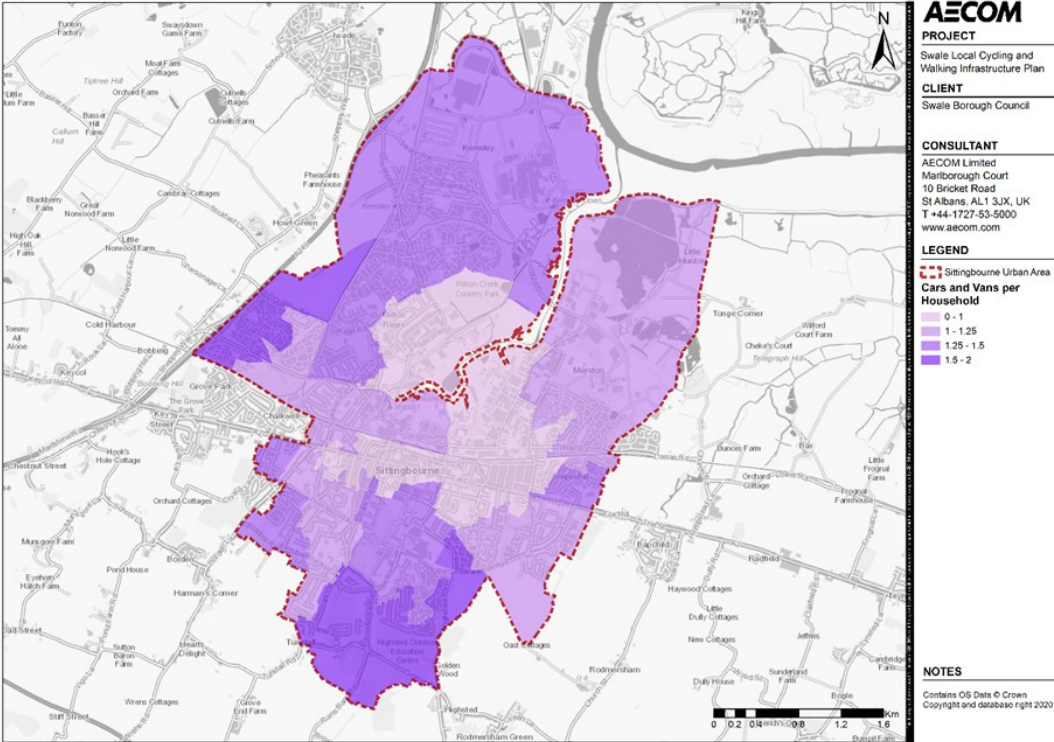


Figure 2-14: Car or Van Availability - Sittingbourne

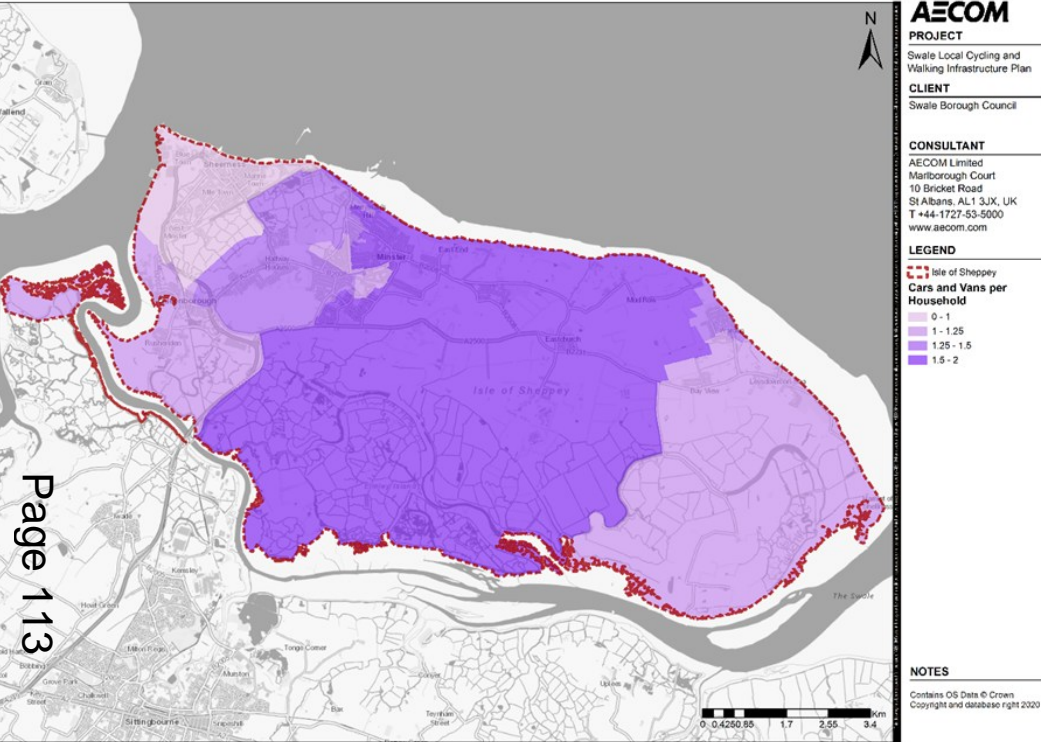


Figure 2-15 Car or Van Availability- Isle of Sheppey

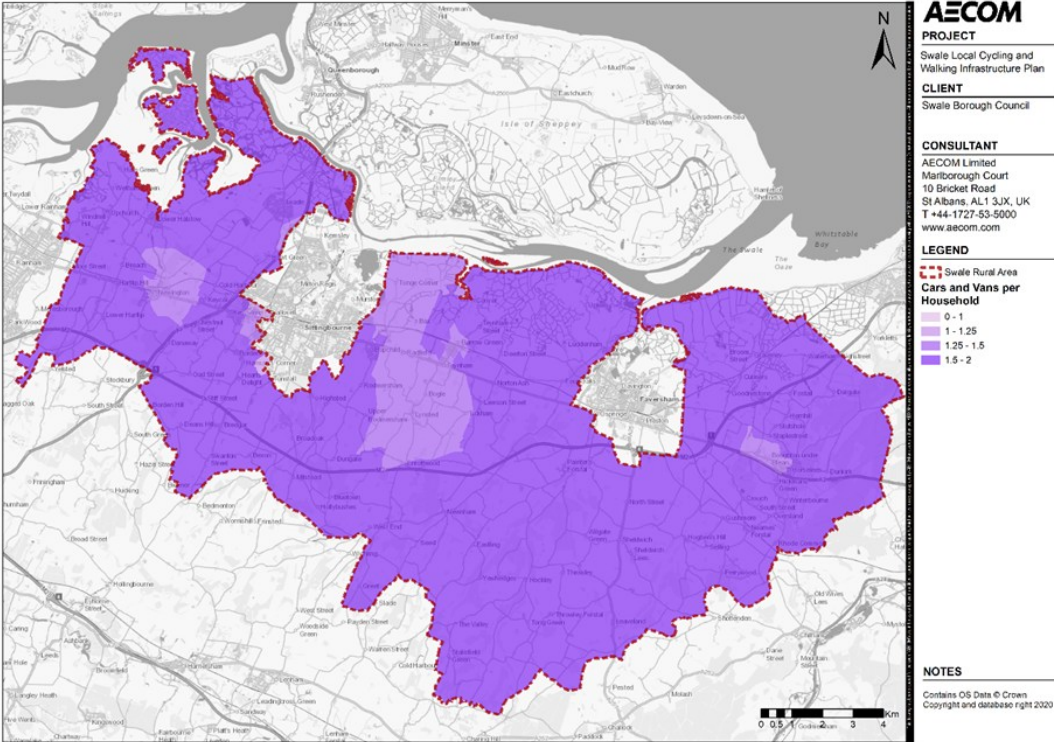


Figure 2-16 Car or Van Availability- Rural Swale

Deprivation

There are large disparities in levels of deprivation across Swale, from prosperous parts of Faversham to pockets of deprivation on the Isle of Sheppey such as Sheerness and Queenborough, which are some of the most deprived wards in England.

Figure 2-17 represents the Indices of Multiple Deprivation (IMD) in 2019 across Swale. IMD considers factors such as income, employment, education, skills and training, health and disability, crime, barriers to housing and services and the living environment. There is a large variation in the IMD deciles across the borough, with areas to the south-west of the borough experiencing lower IMD deciles, and the Isle of Sheppey being scored the most deprived decile. The IMD in the four study areas can be seen in more detail in Figure 2-18 to Figure 2-22

As Figure 2-22 illustrates, there are pockets of further intensive social and economic inequality in the isolated communities of coastal areas in Swale. Left Behind Neighbourhoods (LBNs) are a metric developed by the Local Trust and Oxford Consultants for Social Inclusion (OCSI) to define places that rank highly in terms of IMD, but also lack social infrastructure. There are ten LBNs in Kent, two of which are located in Swale, specifically on the Isle of Sheppey.

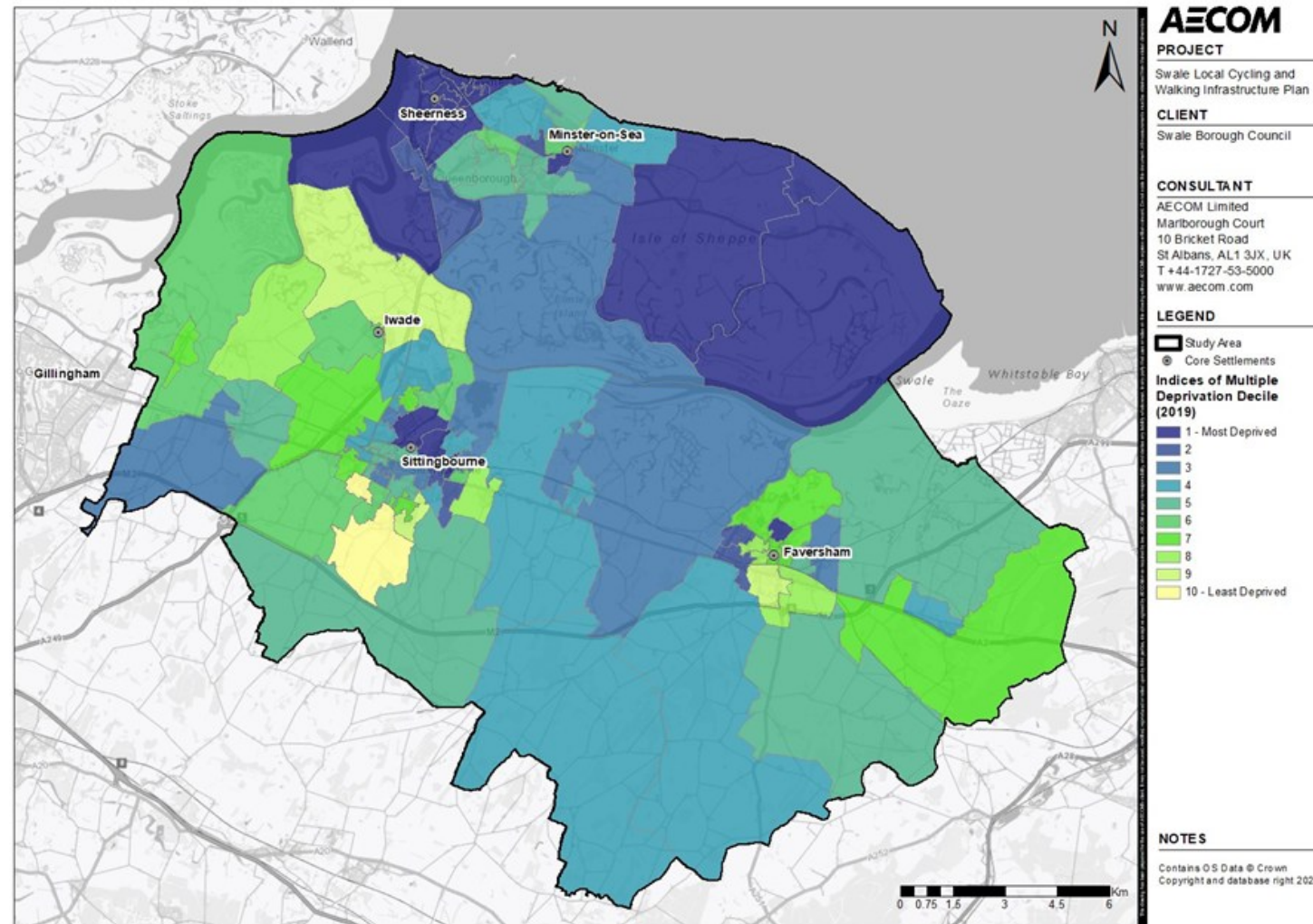


Figure 2-17 IMD Across Swale



AECOM

PROJECT
Swale Local Cycling and Walking Infrastructure Plan

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www.aecom.com

LEGEND

- Study Area
- Sittingbourne Urban Area
- Indices of Multiple Deprivation Decile (2019)
 - 1 - Most Deprived
 - 2
 - 3
 - 4
 - 5
 - 6
 - 7
 - 8
 - 9
 - 10 - Least Deprived

NOTES
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Figure 2-19 IMD- Sittingbourne

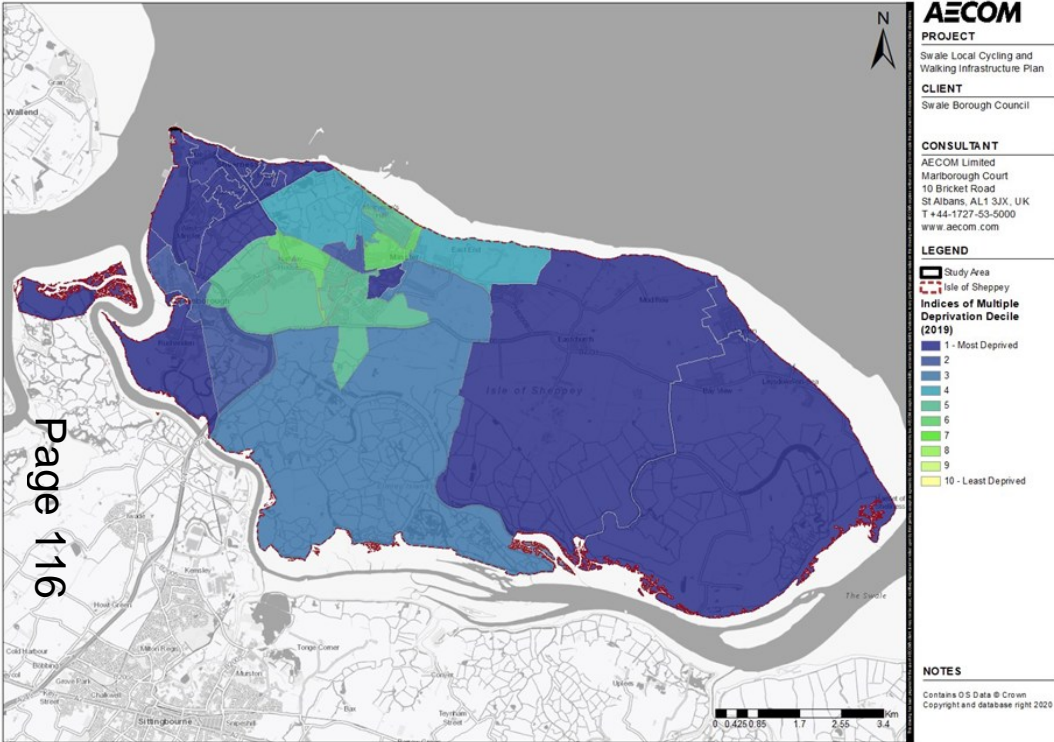


Figure 2-20 IMD- Isle of Sheppey

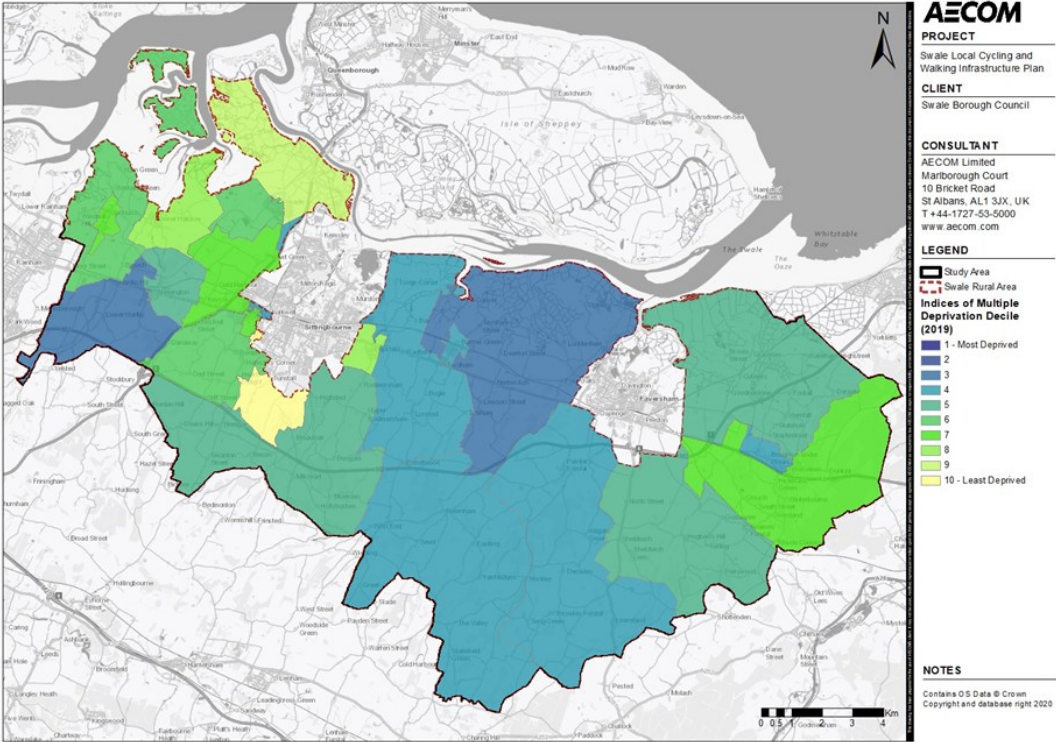


Figure 2-21 IMD- Rural Swale



Figure 2-22 Left Behind Neighbourhoods Across Swale

Trip Generators and Attractors

Trip generators and attractors have been identified to establish key trip origin and destination points across Swale, which are used in subsequent stages of the LCWIP to undertake network planning for cycling and walking. Identification of trip generators and attractors is crucial to identify desire lines across Swale to ascertain where active travel infrastructure could be a valuable tool in encouraging mode shift and uncovering suppressed demand.

Figure 2-23 illustrates the trip attractors and generators across Swale. It can be seen that there are agglomerations of trip attractors in Faversham, Sittingbourne and the north-west of the Isle of Sheppey, whereas rural Swale has much fewer key trip attractors and generators.

As shown in Figure 2-24 to Figure 2-27, Sittingbourne, Faversham and the Isle of Sheppey have a high number of key trip generators and attractors, with a number of major employment sites, such as the Eurolink in Sittingbourne and the HMP Sheppey Cluster on the Isle of Sheppey. Whilst rural Swale has fewer trip generators and attractors, there are rail stations, a number of bus stops as well as a number of education and leisure sites.

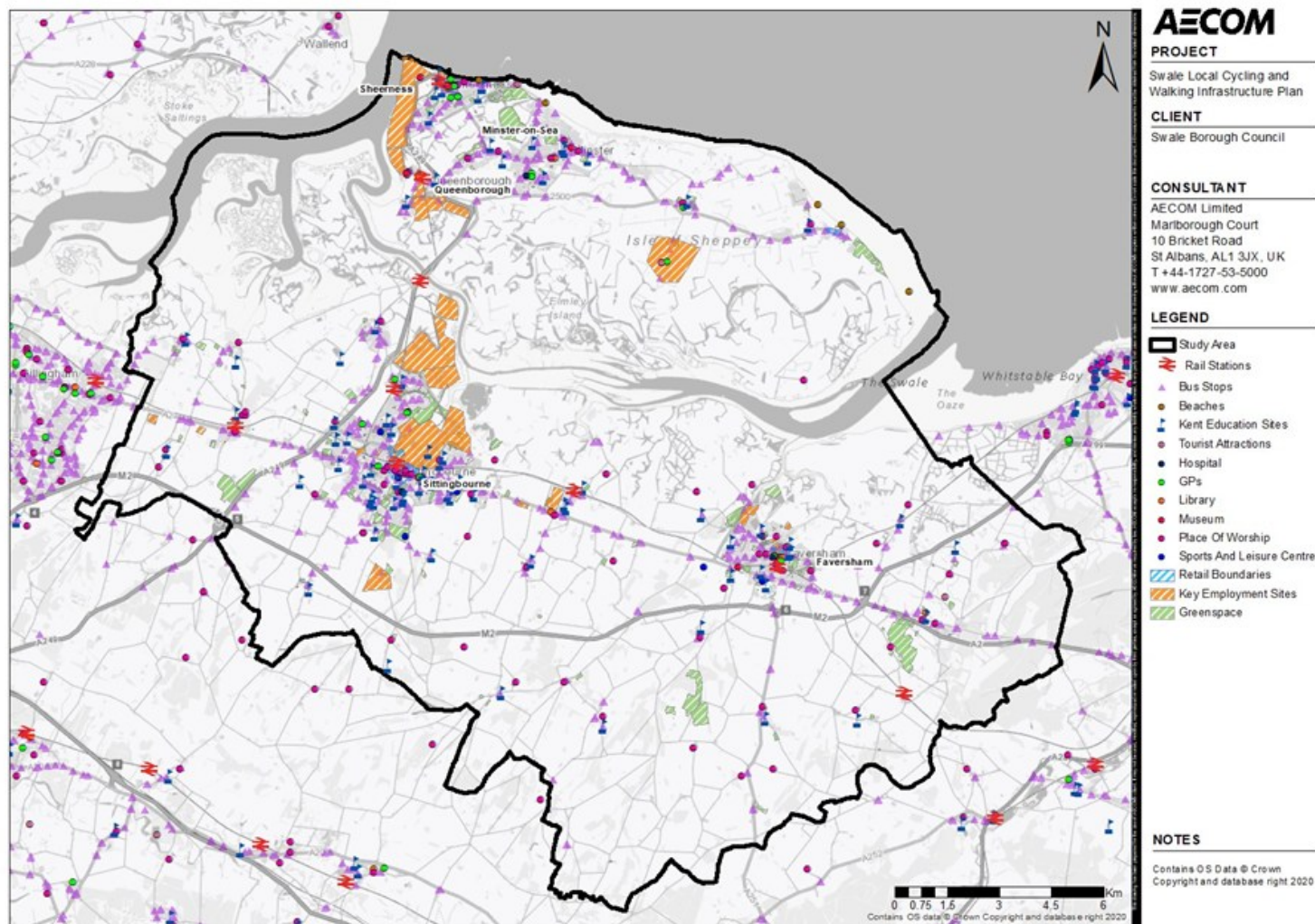


Figure 2-23 Trip Generators and Attractors Across Swale

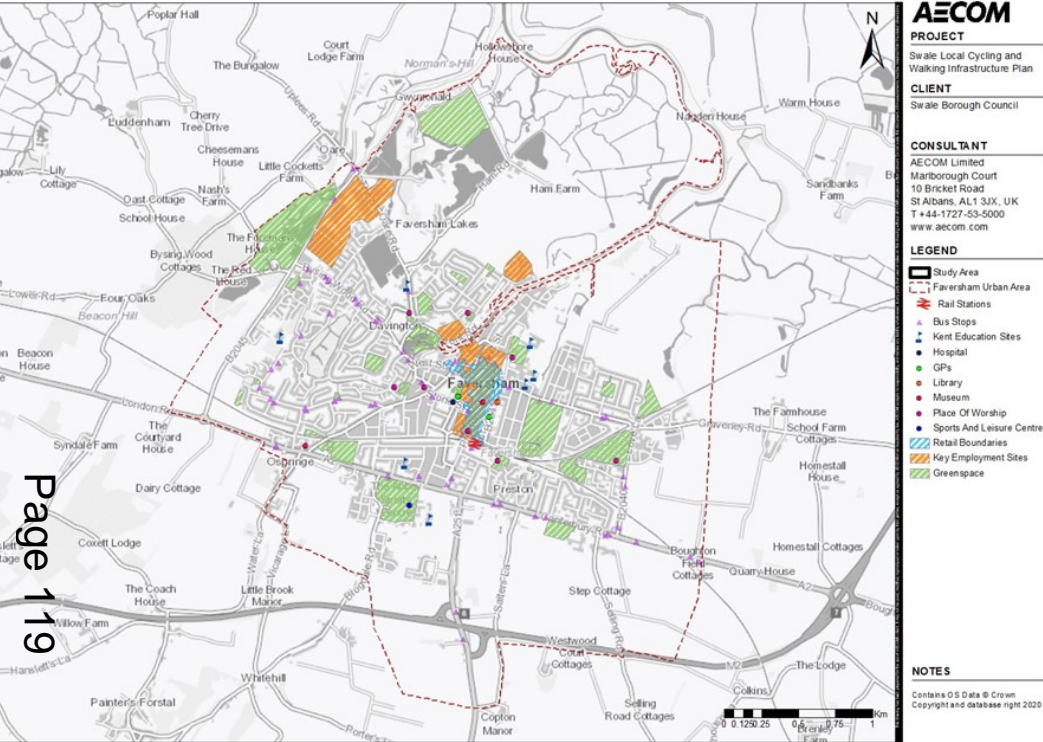


Figure 2-24 Trip Generators and Attractors- Faversham

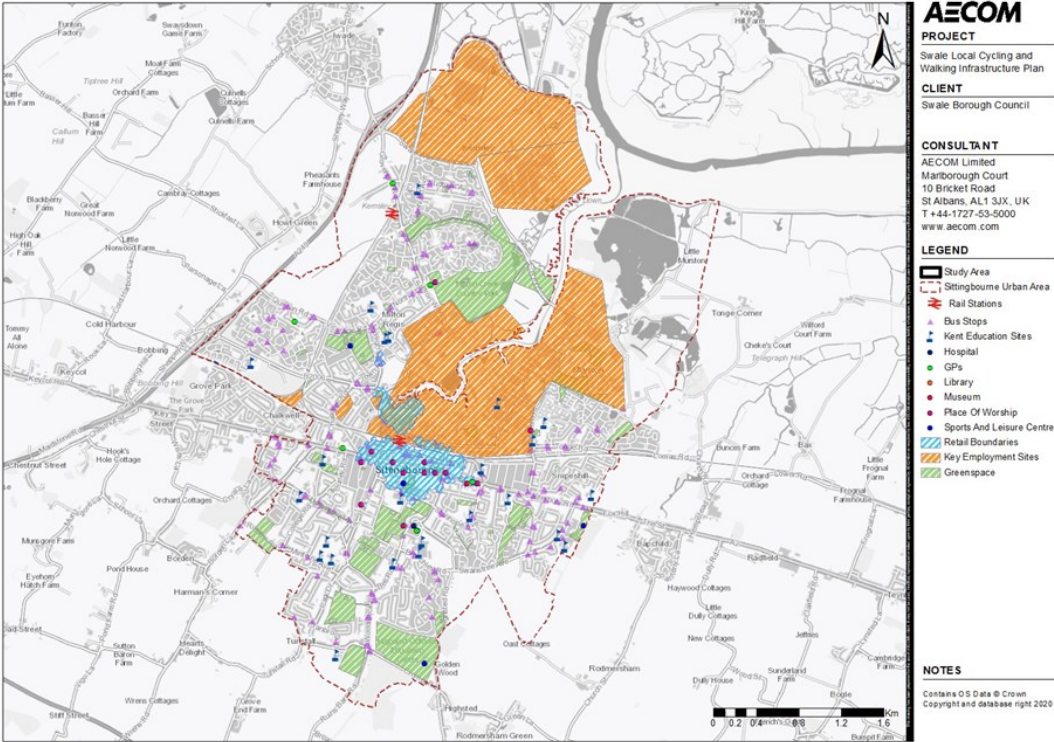


Figure 2-25 Trip Generators and Attractors- Sittingbourne

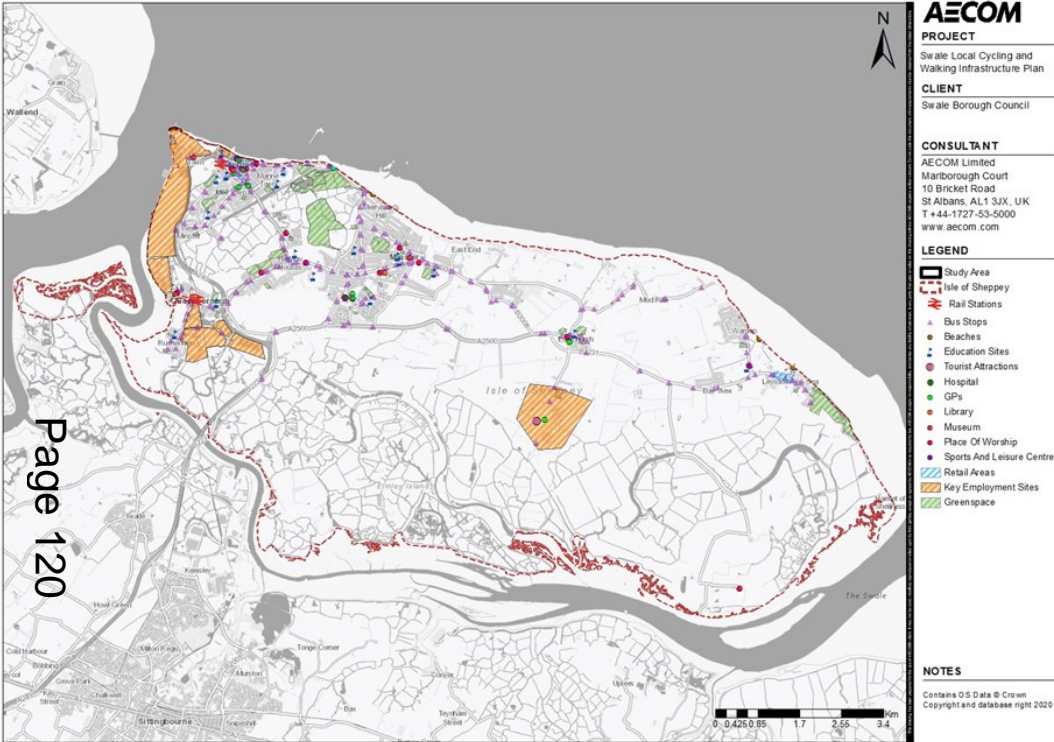


Figure 2-26 Trip Generators and Attractors- Isle of Sheppey

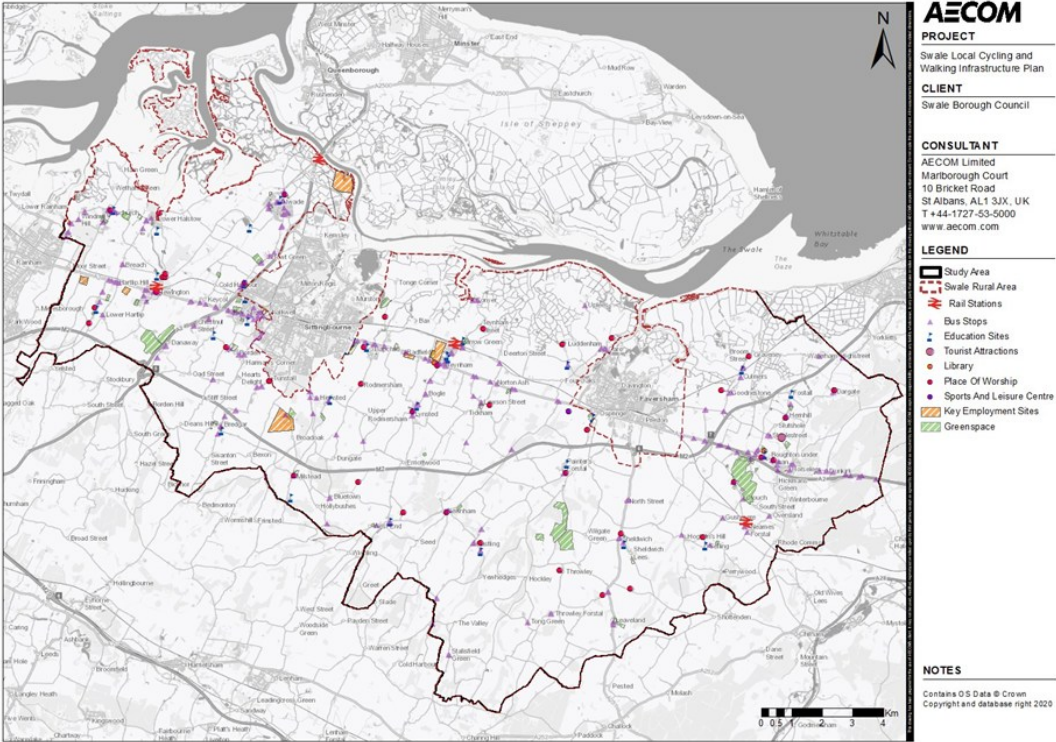


Figure 2-27 Trip Generators and Attractors- Rural Swale

Future Trip Generators and Attractors: Committed Developments

There are a number of committed housing, employment and mixed-use developments across Swale. It is important to consider both existing and future trip generators/ attractors in order to ensure any proposed active travel infrastructure serves existing demand but also meets and encourages future demand.

As Figure 2-28 illustrates, there are a number of committed developments across Swale, largely located on the urban peripheries of Sittingbourne and Faversham and the Isle of Sheppey. Overall, there are 38 committed developments in the district, which is the fourth highest number of committed developments across the borough.

Figure 2-29 to Figure 2-32 highlight in more detail the committed developments across the study areas.

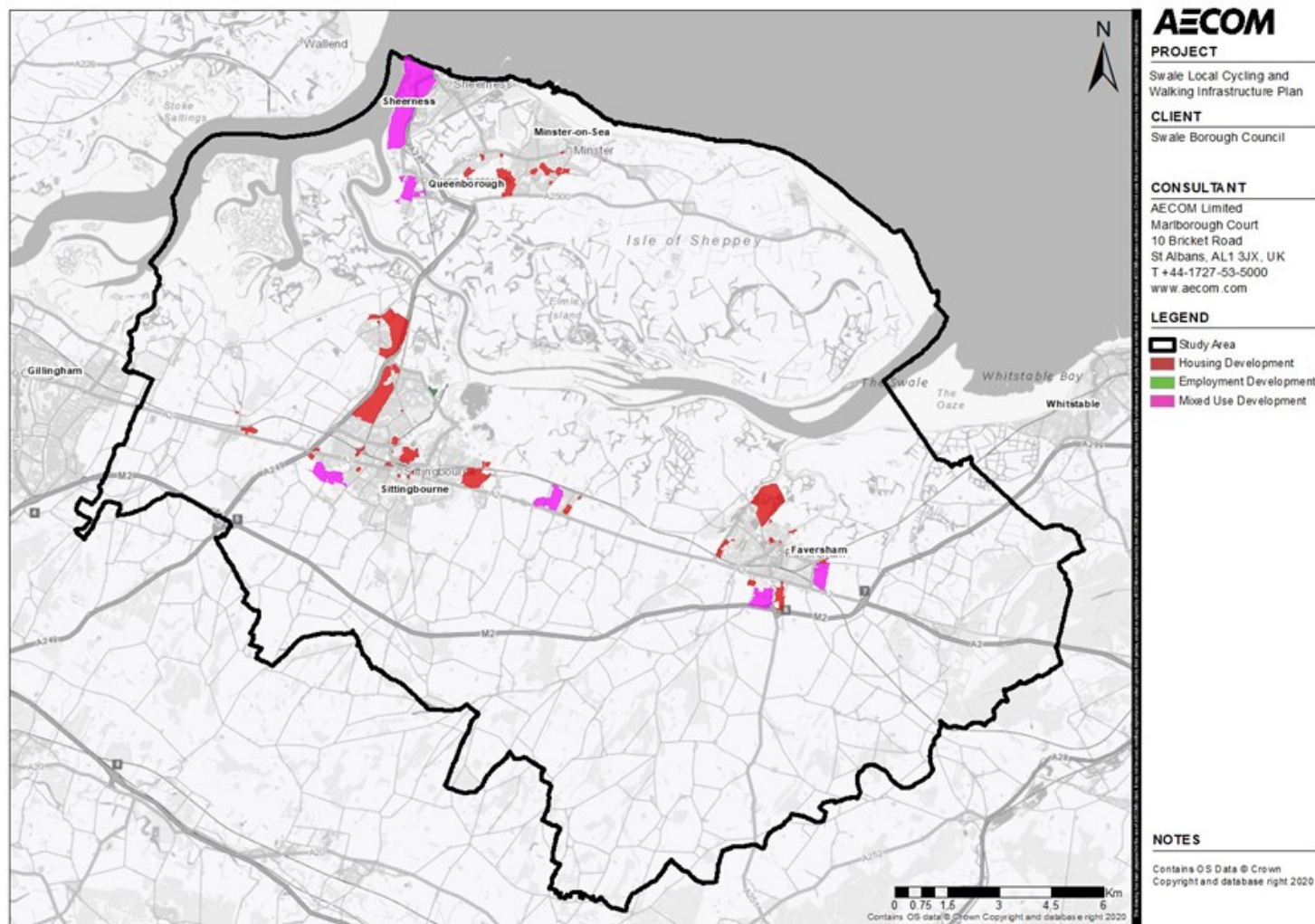


Figure 2-28 Committed Developments Across Swale



PROJECT
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LEGEND

- Study Area
- Sittingbourne Urban Area
- Housing Development
- Employment Development

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Figure 2-30 Committed Developments – Sittingbourne

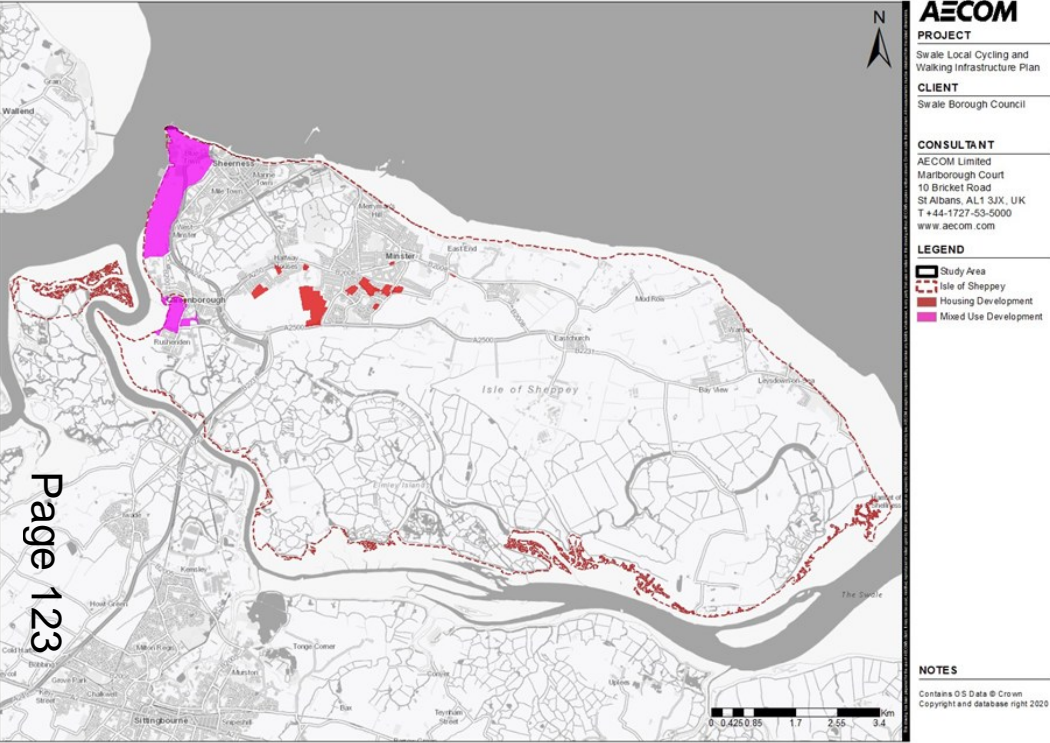


Figure 2-31 Committed Developments – Isle of Sheppey

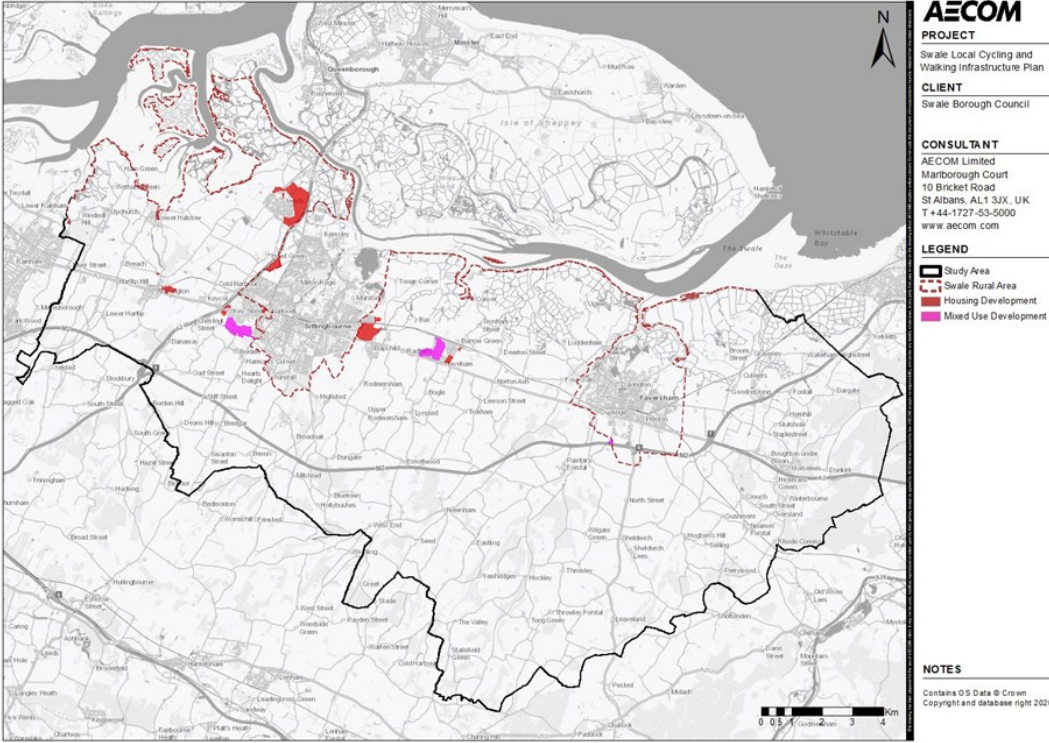


Figure 2-32 Committed Developments – Rural Swale

Transport Network

The following section outlines the transport network across Swale, including existing active travel network and any future planned cycling and walking schemes. It also covers public transport and highways in Swale. Understanding the transport network is crucial in identifying gaps, and more broadly, building a picture of the network as a whole.

Active Travel Network

The active travel network across Swale is comprised of routes which can be used for non-motorised modes, such as walking, wheeling and cycling. This LCWIP considers both the existing active travel network and future active travel network in its analysis.

Existing Active Travel Network

Figure 2-33 illustrates the National Cycle Network (NCN), existing cycle routes and lanes and Public Rights of Way (PRoW) across Swale. Additionally, Figure 2-34 to Figure 2-37 illustrate the active travel network across the four study areas.

The NCN is largely comprised of off-road and on-road routes, typically making use of quieter roads and shared-use paths. NCN Route 1 (North Sea Cycle Route) runs between Dover and John O'Groats, within Kent, it runs east-west from Dover to Dartford, connecting Whitstable to Gillingham via Faversham and Sittingbourne. NCN Route 174 (Sheerness Way)

connects into NCN Route 1, running north from the north-west of Sittingbourne to the Isle of Sheppey. Notably, whilst the east-west cycling provision across Swale is coherent and relatively direct, the north-south movements are limited and fragmented.

There is an additional network of cycle routes and lanes across Swale. These are comprised of on-road and off-road cycle provision. The existing network of cycle routes and lanes is sparse and does not form a connected network, it is primarily located within Sittingbourne with notable gaps in rural Swale, east Swale and the Isle of Sheppey. It is worth noting that the standard of cycling provision varies significantly across the network, with lengths of the routes being substandard and in need of upgrading.

With regards to the PRoW network, Kent County Council manages the longest public rights of way network of any county in England and Wales. Although footpaths make up 83% of the PRoW network in Kent, the percentage of other rights of way paths including byways, restricted byways and bridleways is below the national average [5]. Network coverage generally aligns with areas of high population and employment density, while the Isle of Sheppey has a relatively sparse network.

The network priority status of the PRoW network is as follows:

- Category A
 - ◇ North Downs Way National Trail
 - ◇ Routes to local facilities such as bus stops, churches, schools, parks, tourist attractions
 - ◇ Paths used for daily leisure walking
 - ◇ Multi-use paths with a clear public benefit, such as allowing horse riding or cycling in addition to walking
 - ◇ Paths with potential for improvement
 - ◇ Paths promoted by Explore Kent.
- Category B
 - ◇ any paths not under category A
 - ◇ paths on access land
 - ◇ coastal access paths
 - ◇ permissive paths managed by KCC.

There are also many well-established and signposted leisure walking routes in Swale such as long distance trails: North Downs Way and the Saxon Shore Way. There are also a number of shorter trails such as A Land of all Seasons Nature Trail.

The active travel network across Swale is

[5] https://www.kent.gov.uk/__data/assets/pdf_file/0004/90571/The_Current_Network__Use_and_Provision.pdf

diverse in terms of the network density, with significant variance between the Isle of Sheppey and Sittingbourne. Overall, there are extensive network gaps on the Isle of Sheppey and across rural Swale, whereas there is more dedicated walking and cycling facilities in the urban areas of Sittingbourne and Faversham. Additionally, the suitability of the active travel network for walking, wheeling and cycling varies, with opportunities to upgrade the standard of such routes. For instance, the development of more accessible trails is an ongoing process that recently saw the National Cycle Network Route 2 improved to enable greater numbers of users with a diverse range of mobility needs [6].

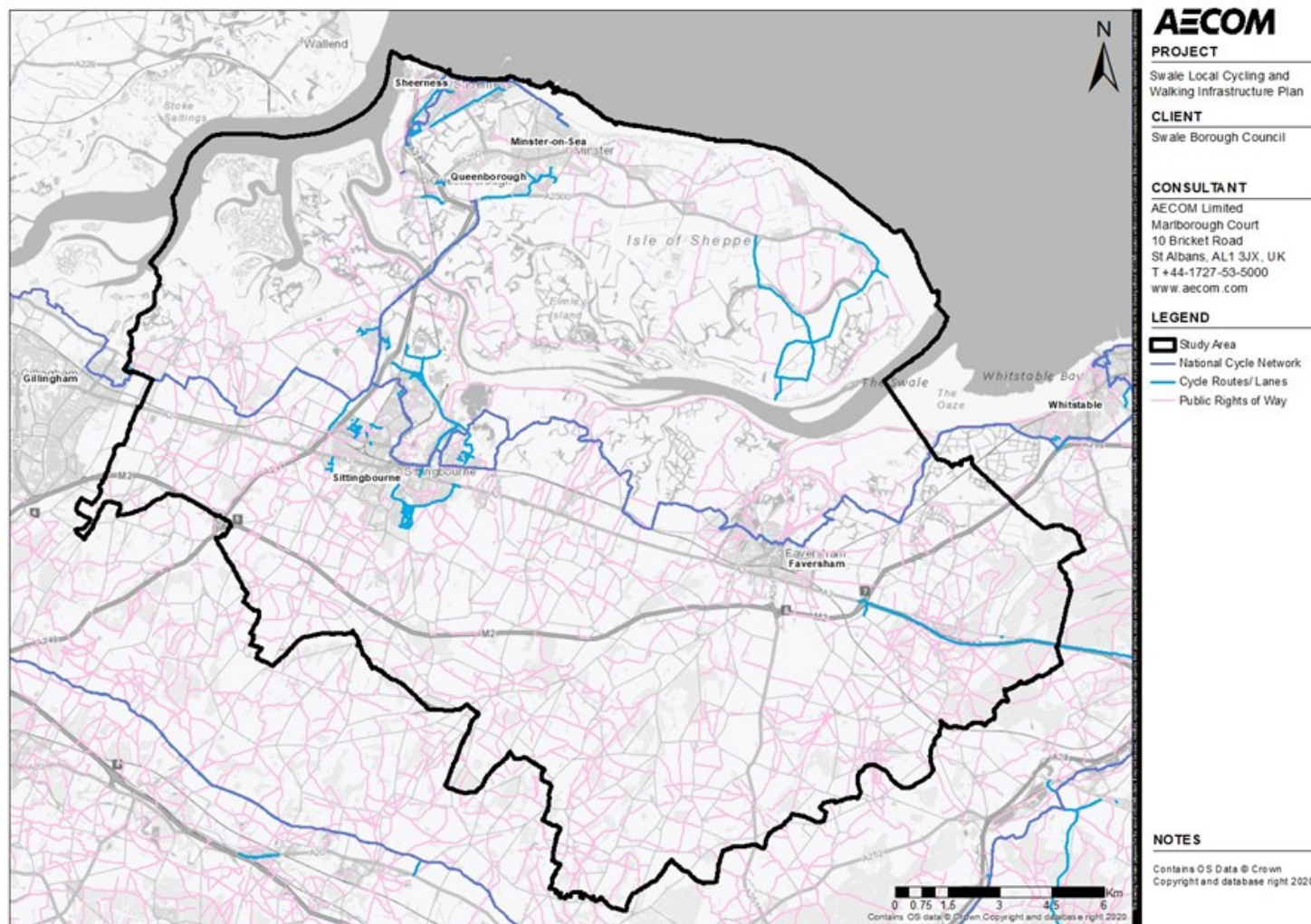


Figure 2-33 Existing Active Travel Network Across Swale

[6] <https://www.sustrans.org.uk/our-blog/news/2022/june/newly-improved-walking-wheeling-and-cycling-route-in-east-sussex-reopens-for-use>

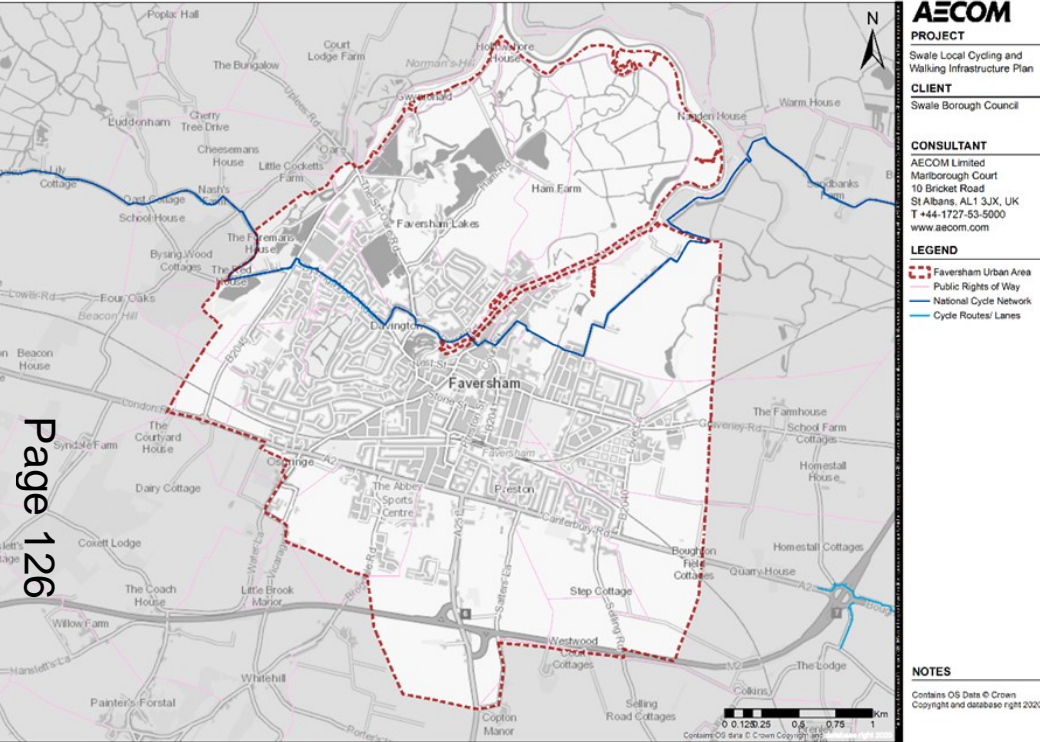


Figure 2-34 Active Travel Network- Faversham

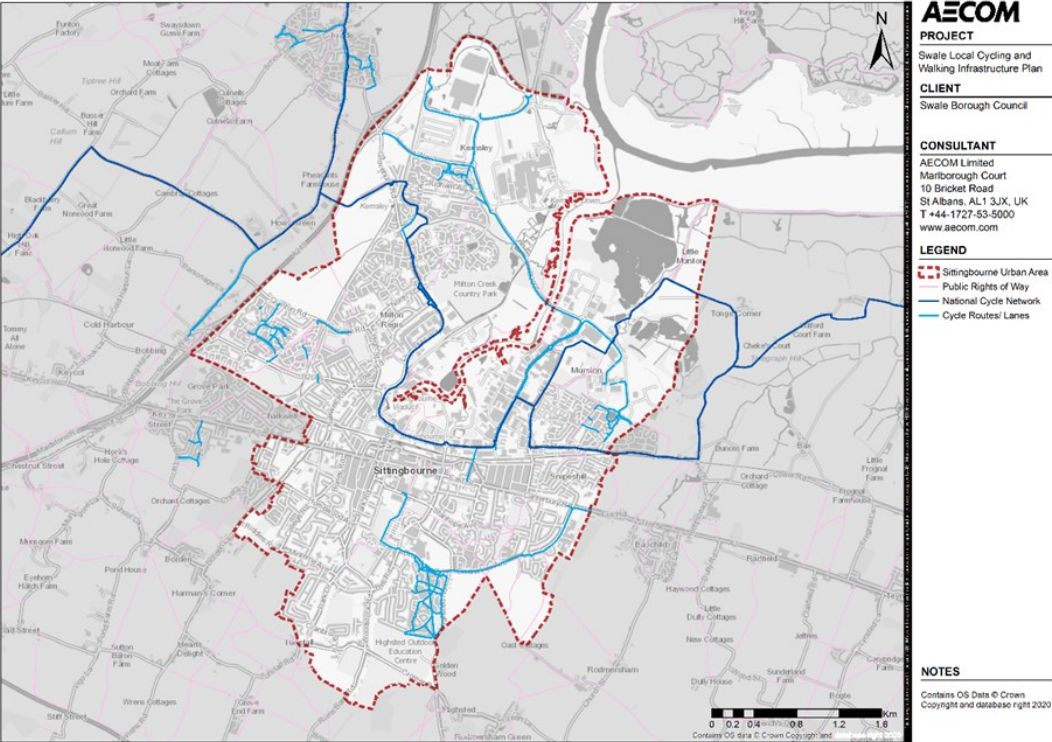


Figure 2-35 Active Travel Network- Sittingbourne

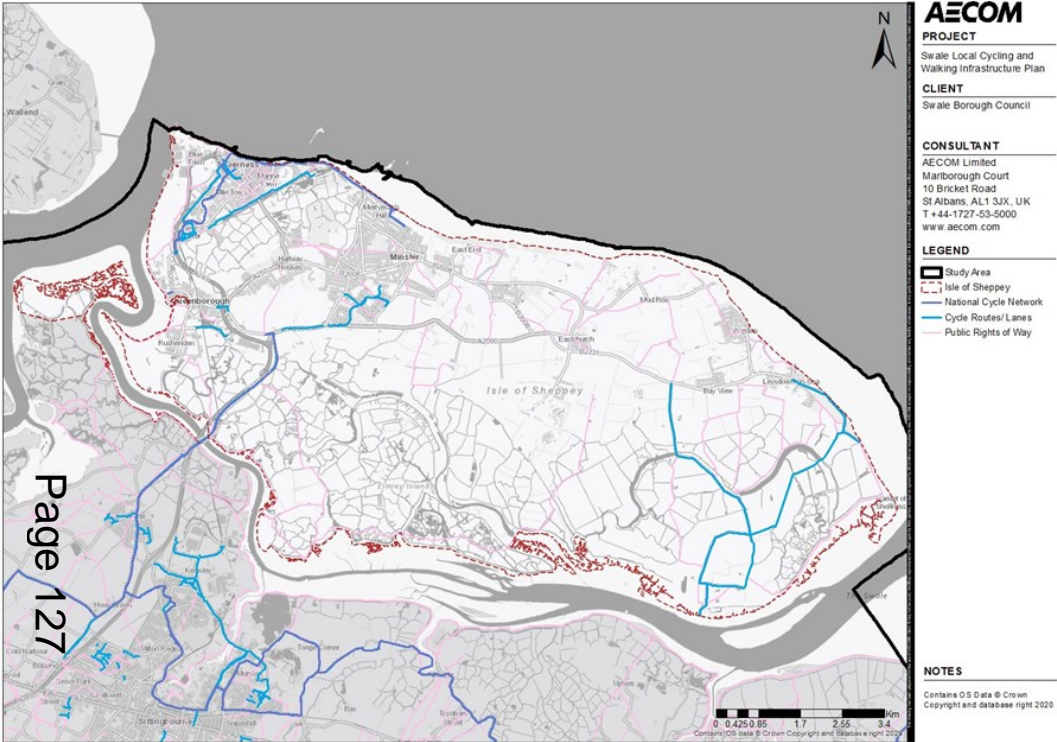


Figure 2-36 Active Travel Network- Isle of Sheppey

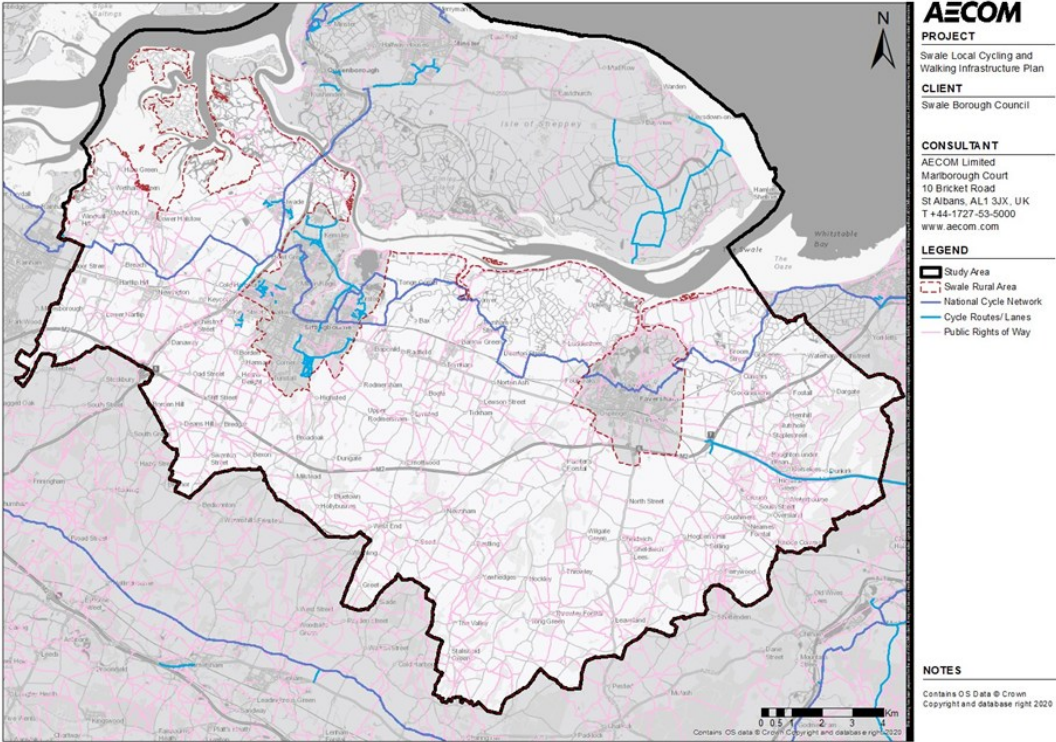


Figure 2-37 Active Travel Network- Rural Swale

Future Active Travel Network

Across Swale there are a number of active travel schemes which are proposed or committed. These schemes are considered within the LCWIP analysis as they will contribute to the wider active travel network.

The proposed active travel schemes, studies or audits which have been undertaken across Swale are as follows (also illustrated in Figure 2-38 to Figure 2-42):

- Sustrans Sheppey Audit (June 2020) – proposals for 8 new route recommendations with complementary improvement measures and two town centre studies: Minster and Sheerness
- Faversham Town Audit (June 2020) – proposals for 6 new cycle routes and a town centre study on pedestrian and cycle improvements and traffic reduction in Faversham
- Swale Cycling and Walking Framework Consultation (2018 – 2022)
- Active Travel 4 Proposals
- Kent Local Walking and Cycling Infrastructure Plan (in process)
- Faversham Local Walking and Cycling Infrastructure Plan (2022)
- Faversham to Teynham Quietway (Feasibility stage) – recommendations for a Quietway between Faversham and Teynham along NCN Route 1.

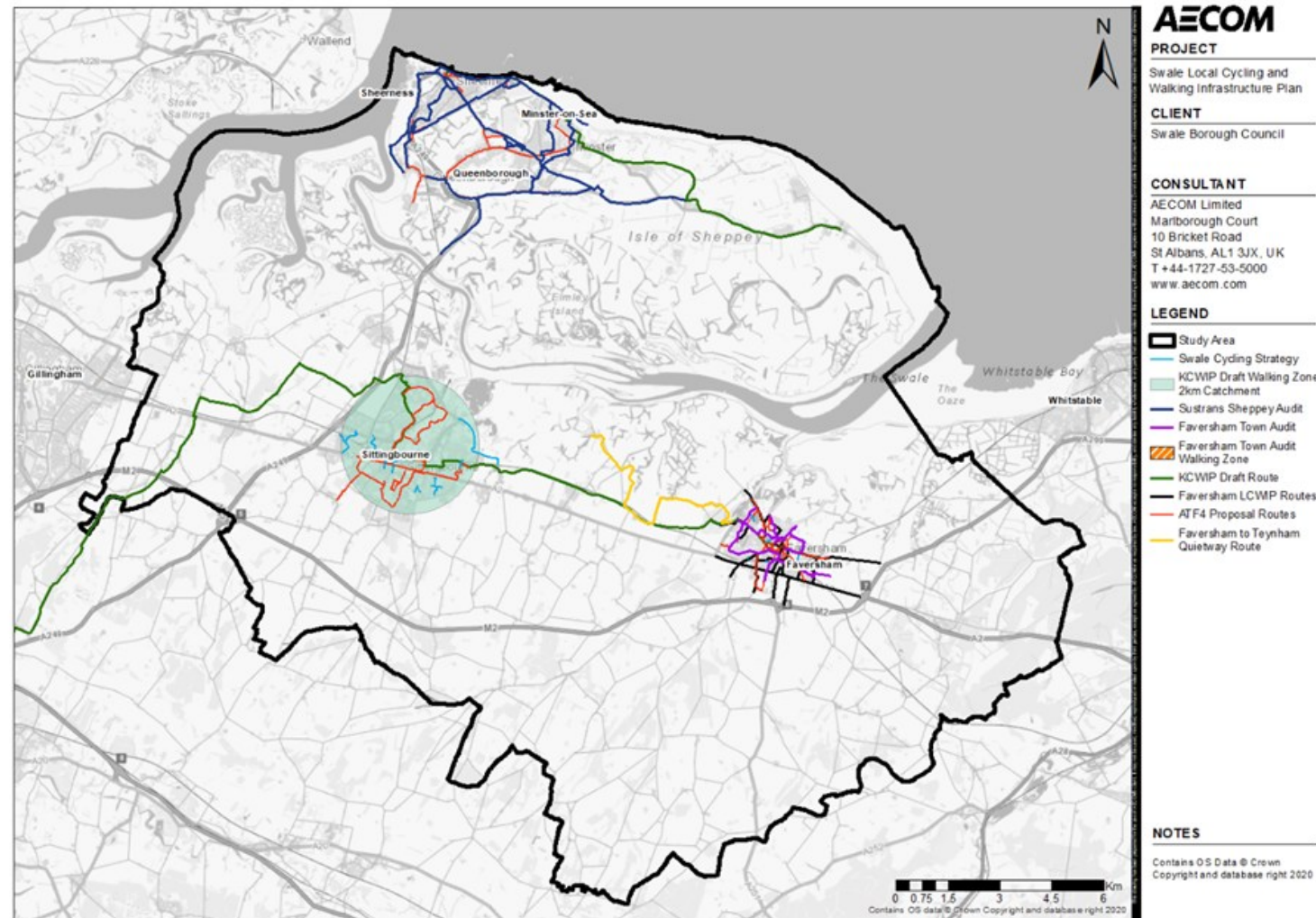


Figure 2-38 Proposed Active Travel Schemes Across Swale

The proposed active travel schemes are located within and around Faversham, Sittingbourne and the Isle of Sheppey. The KCWIP is focused on proposing inter-urban

routes, which form crucial east-west connections in Swale, and a north-south route to Maidstone.

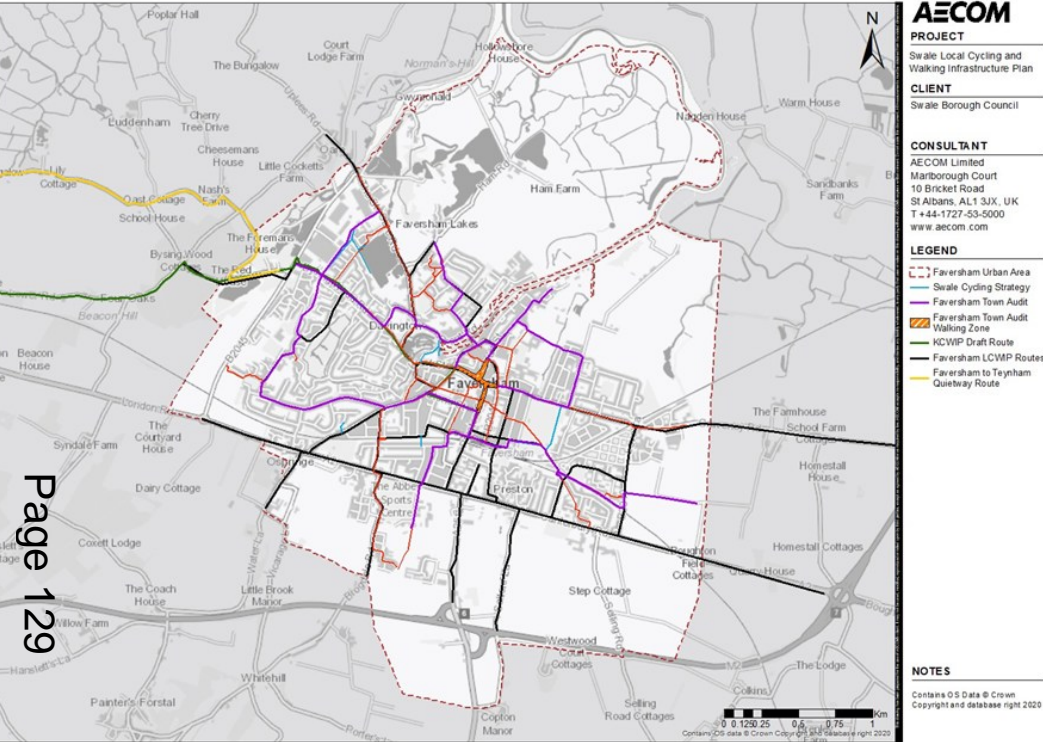


Figure 2-39 Future Active Travel Network- Faversham

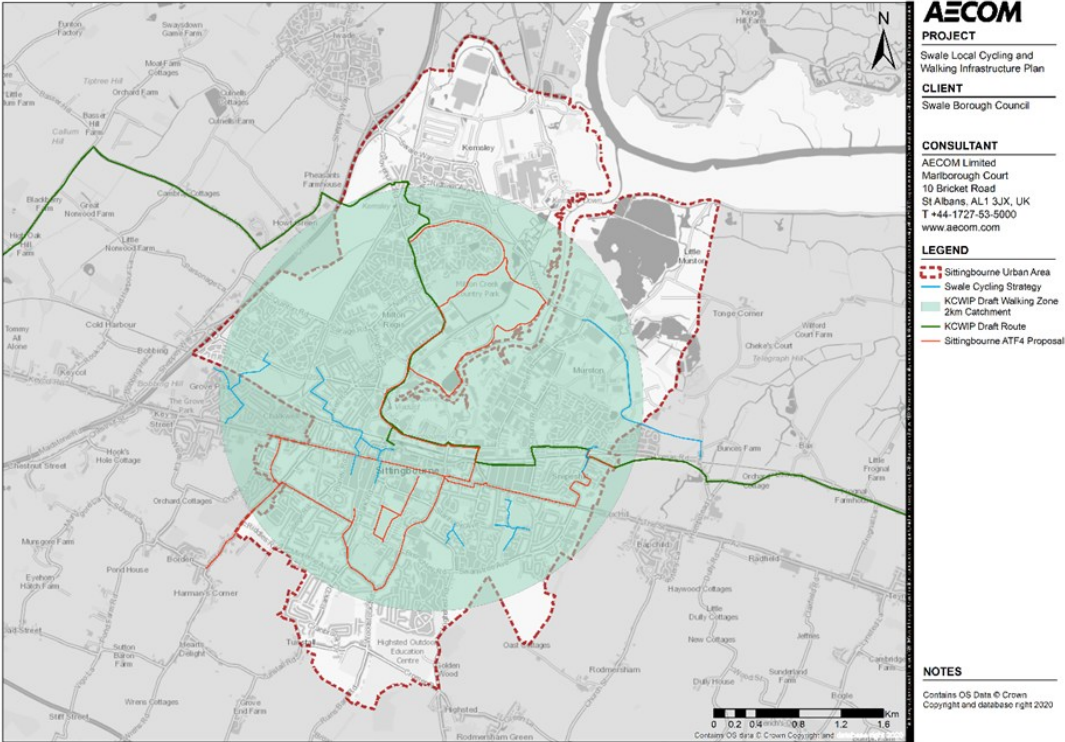


Figure 2-40 Future Active Travel Network- Sittingbourne

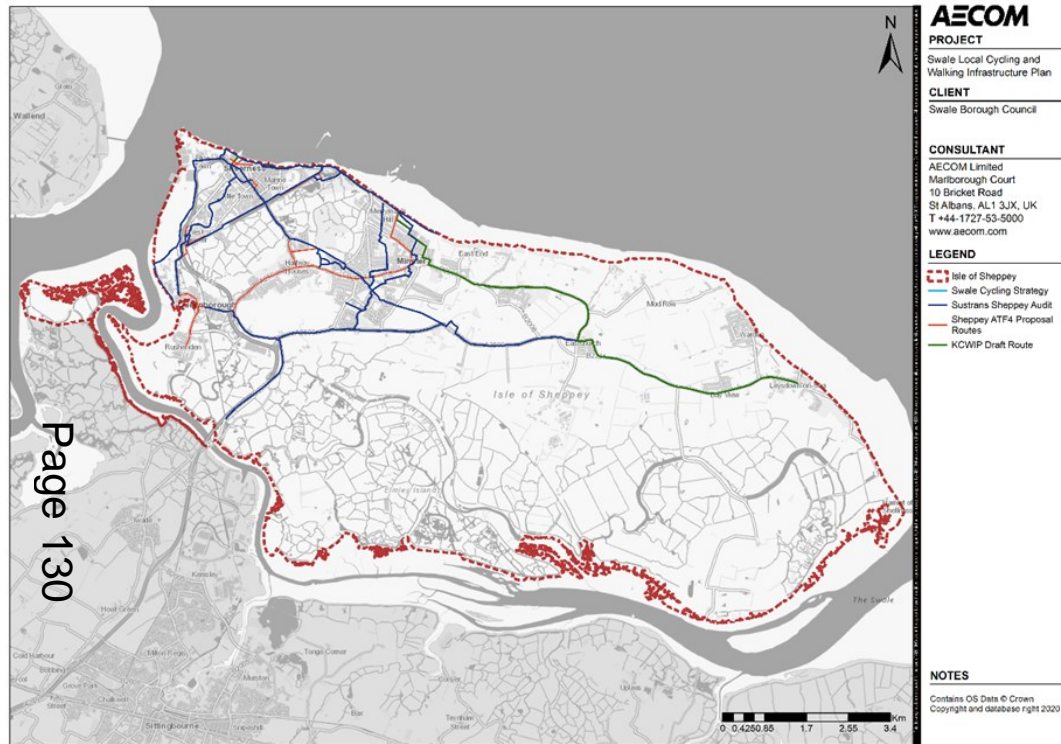


Figure 2-41 Future Active Travel Network- Isle of Sheppey

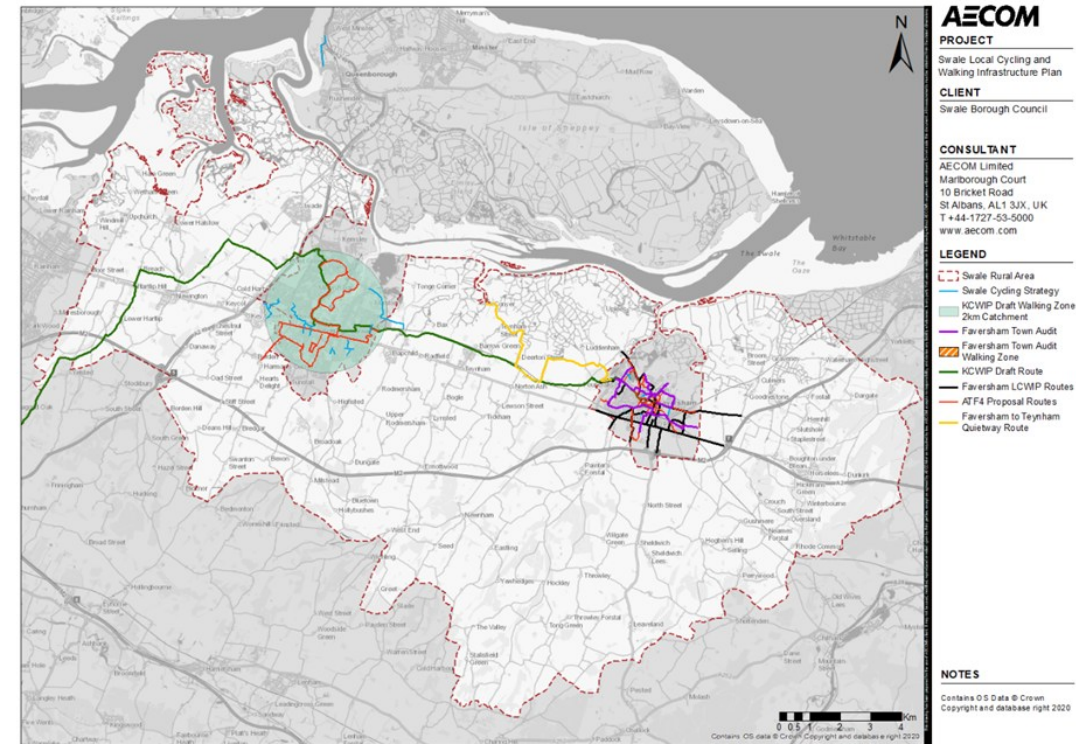


Figure 2-42 Future Active Travel Network- Rural Swale

Public Transport Network

The rail network across Swale is illustrated in Figure 2-43. The bus network, which forms key public transport infrastructure across rural areas is operated by a number of providers. Typically, bus stops are concentrated around urban areas, which generate more demand, and in rural areas the bus network is often more unreliable and infrequent. Kent's Bus Service Improvement Plan (BSIP) found that the frequency of bus services in rural areas was essentially non-existent after the evening peak commuting period.

Additional on-demand services exist in Swale which are directed at improving accessibility of the bus network. The Kent Karrier service operates across Kent, serving users who have a medical condition which makes travelling on public transport difficult, are aged over 85 or live in a rural area more than 500m from a bus route or railway station.

In 2021, Stagecoach announced a new bus route link for Swale, operating between Canterbury, Faversham, Sittingbourne and Maidstone. Buses run every 30 minutes and provide crucial inter-urban connections between Sittingbourne or Faversham to Maidstone and Canterbury in the absence of a direct train service.

Southeastern Railway and Thameslink operate the majority of passenger services across Swale, offering direct links from Sittingbourne

Table 2-2 Passenger Numbers for Stations across Swale

Rank	Station	Total Station Entries and Exits (2021- 2022)	Cycle Storage Facilities
1	Sittingbourne	1,659,200	98 sheltered stands without CCTV
2	Faversham	1,119,620	33 sheltered stands without CCTV
3	Sheerness-on-Sea	332,398	40 sheltered stands without CCTV
4	Kemsley	151,724	No cycle storage
5	Queenborough	149,976	12 sheltered stands without CCTV
6	Teynham	119,432	10 sheltered stands without CCTV
7	Newington	102,046	6 sheltered stands without CCTV
8	Selling	63,386	No cycle storage
9	Swale	10,154	No cycle storage

and Faversham to St Pancras, Victoria and Charing Cross with 4 services per hour in the peak. The network runs east-west and north-south, connecting the Isle of Sheppey with the rest of Kent.

There are nine operational passenger rail stations in Swale, ranked in terms of their passenger numbers between April 2021 and March 2022 in Table 2-2. Across Kent, Sittingbourne is the 8th busiest station, while Swale station is the second least busiest.

At seven of the nine stations in Swale, there are cycle storage facilities (see Figure 2-44).

The station with the highest number of cycle storage spaces is Sittingbourne, which has 98 spaces, while Newington has the fewest cycle parking spaces (6). Swale station and Kemsley station do not have cycle storage facilities.

Figure 2-45 shows public transport accessibility in Swale, visually representing walking distances from rail stations and bus stops across Swale. Areas located 1 minute from the nearest rail station or bus stop are coloured red, those located between 1-5 minutes from the nearest station are coloured yellow, and those located 5-10

minutes away are coloured green. The map highlights that the areas with the highest public transport connectivity are in major urban centres, with Sittingbourne being the most significant. In Sittingbourne, Faversham, and Sheerness, there is a rail station or bus stop within a 5-minute walking distance throughout the majority of the urban areas. Additionally, good connectivity is observed along the A2 corridor, with frequent bus stops between Faversham and Sittingbourne.

Figure 2-46 illustrates the density of 10-minute walking isochrones (distances) from rail stations and bus stops. Sittingbourne stands out as having the most significant agglomeration of these 10-minute walking isochrones, indicating high levels of connectivity to public transport stops (overlapping isochrones mean that there are 2 or more bus or rail stops in the vicinity, therefore there are likely to be different bus/rail services and better public transport choice available).

In more rural areas of the district, there are still public transport stops, but there are fewer which have overlapping 10-minute walking isochrones. This indicates that although there are public transport stops across rural Swale, these are often isolated, which indicates an overall lower level of public transport accessibility in rural Swale. While there are other concentrations of 10-minute walking isochrones in the district, the density of stops is lower compared to Sittingbourne.

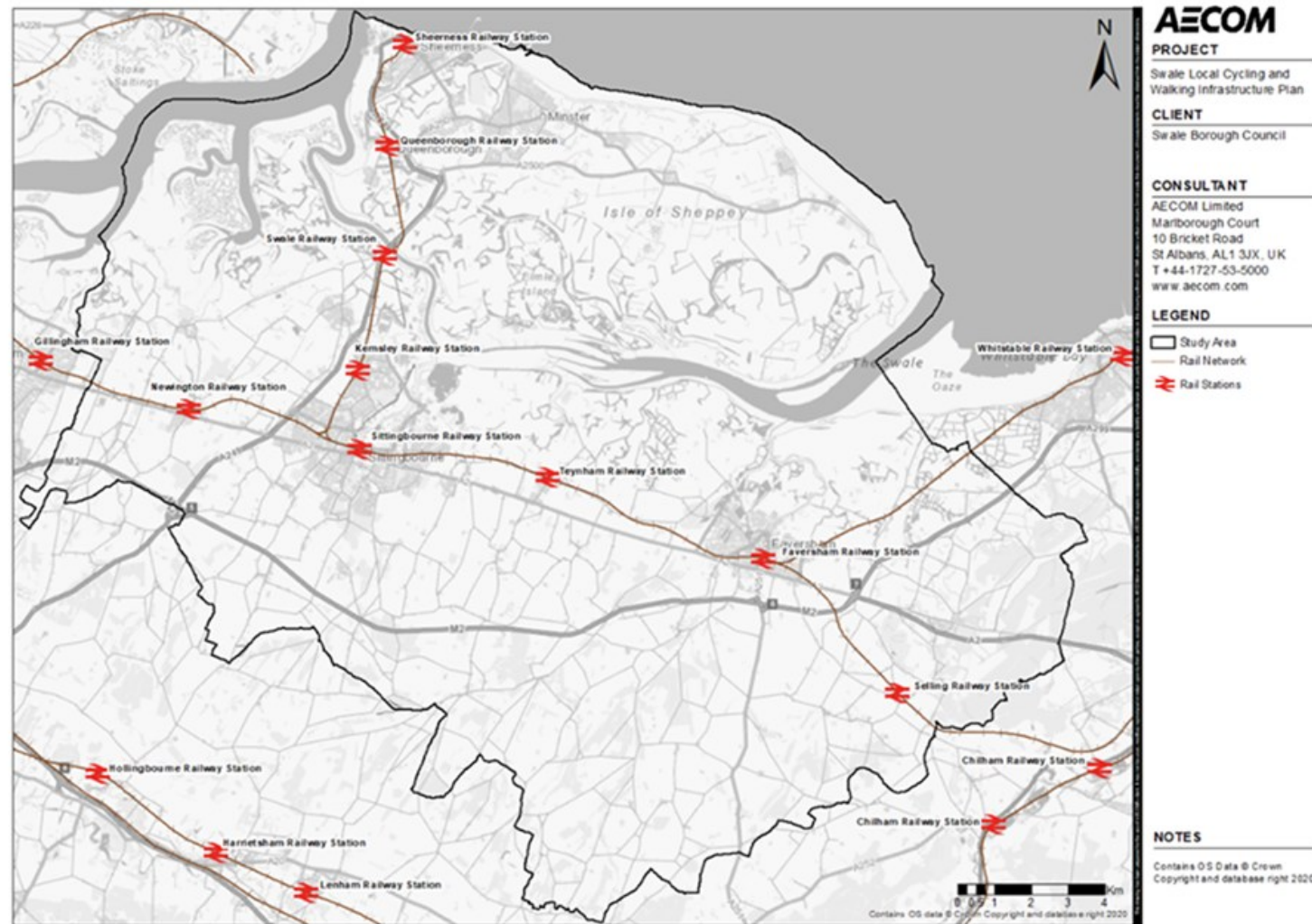


Figure 2-43 Rail Network Across Kent

These figures provide a visual representation of public transport accessibility in Swale, emphasising stronger connectivity in major urban centres like Sittingbourne and highlighting gaps in connectivity across rural areas.

Developing active travel infrastructure in such areas is crucial in improving first/last mile connectivity to public transport, providing better mode choice and reducing car dependency.

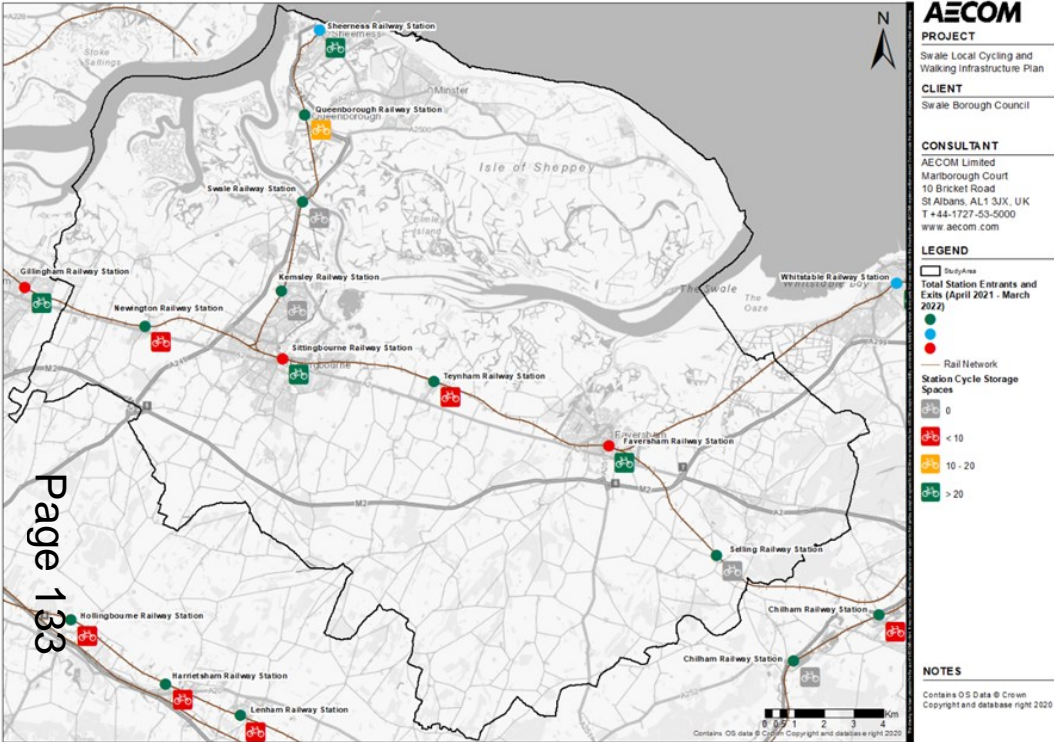


Figure 2-44 Cycle Storage Facilities and Station Entries and Exits Across Swale

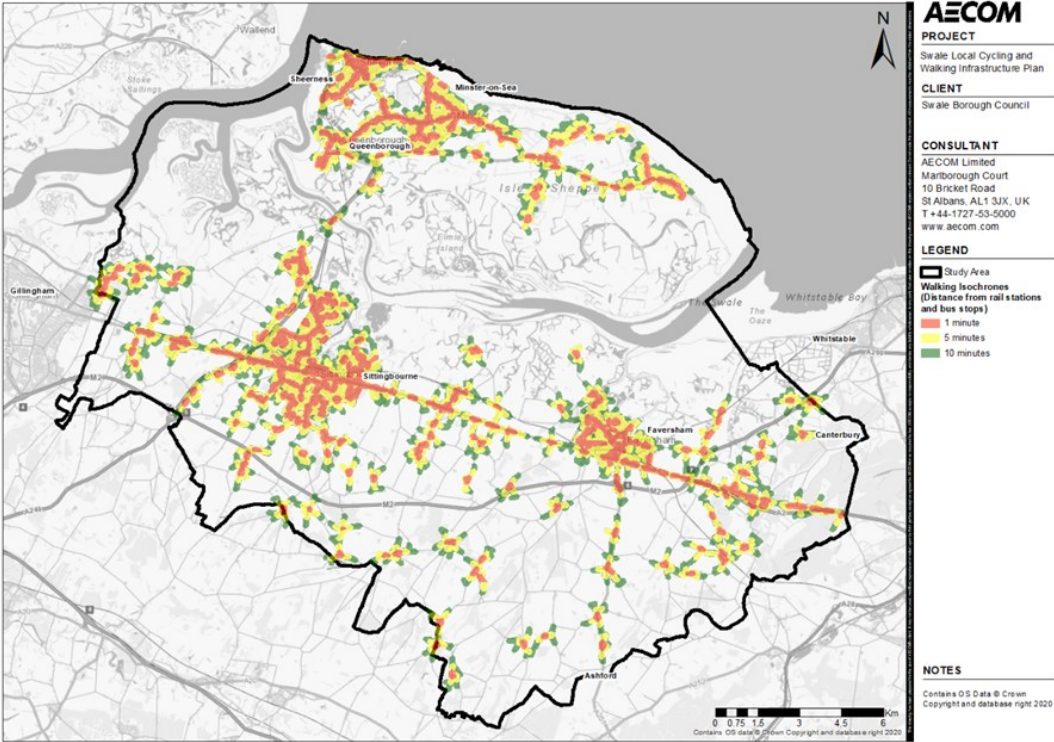


Figure 2-45: Walking Distance from Rail Stations and Bus Stops

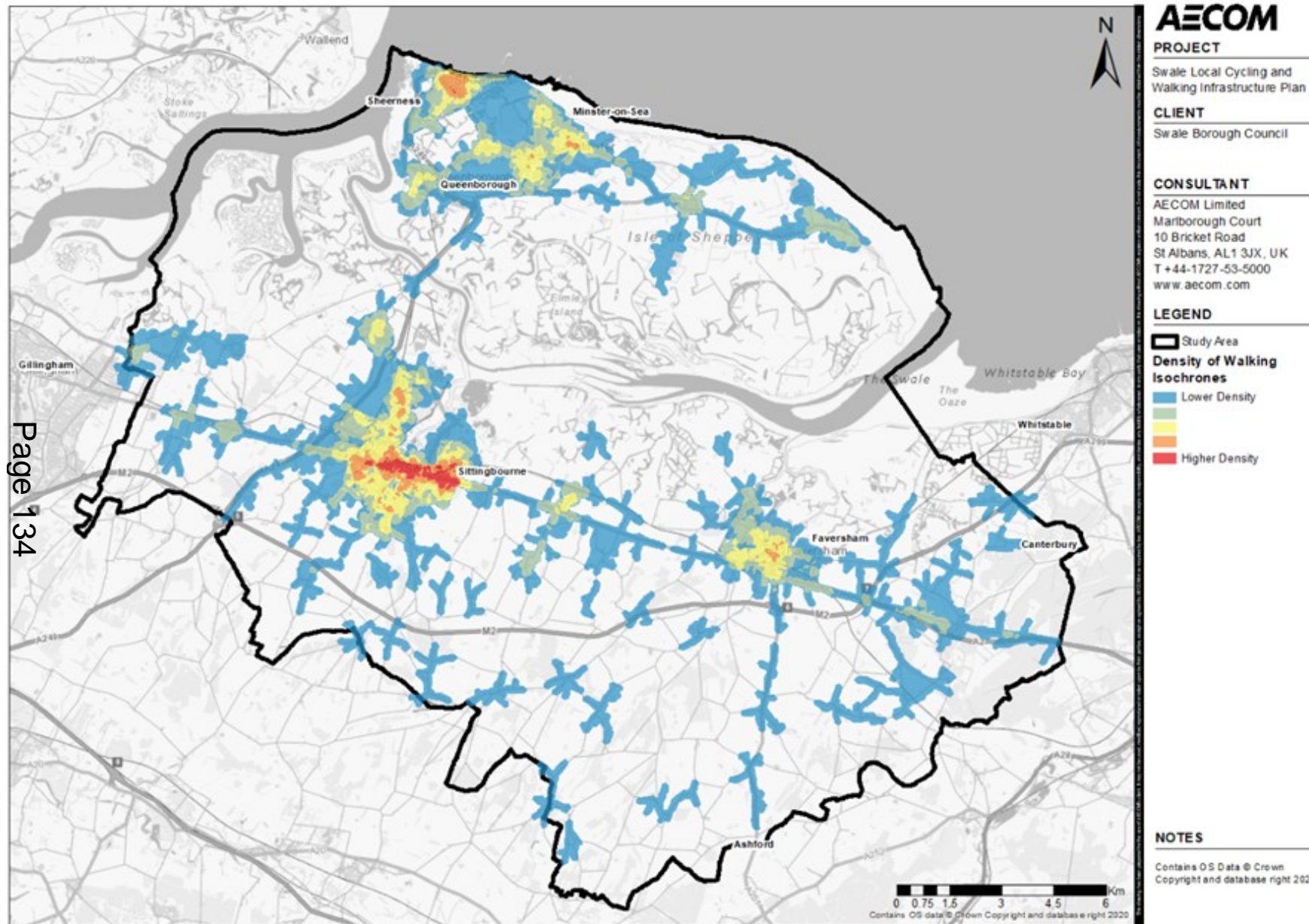


Figure 2-46: Public Transport Accessibility (Walking Distance from Rail Stations and Bus Stops)

Highway Network

Kent is a major confluence of road traffic, with connections into London and to continental Europe. Swale geographic location means it is situated in between several strategic routes. As Figure 2-47 illustrates, the M2, which connects Kent into London is situated to the South of Swale. Additionally, the A2 connects London with Dover, and connects Faversham with Sittingbourne.

A study carried out by The AA Charitable Trust [7] found that 71% of fatal crashes involving young drivers occurred on rural roads. Of the top 10 most dangerous rural roads for young drivers, three of these were located in Kent, two of which were the A2 (ranked second) and the A249 (ranked ninth). This indicates that Swale is bounded north-south and east-west by some of the most dangerous rural roads, which are key indicators of community severance.

The collision data was collected during the period November 2019 to October 2022 and can be seen in Figure 2-49 to Figure 2-52. These figures illustrate collisions with vulnerable road users (VRUs) – which are classified as pedestrians and cyclists. As expected, there are significant incident hotspots on the A2 and A249. Whilst the incidents largely follow major roads, there is also a number of incidents on rural roads (which are not classified in the below Figures). Notably, accident hotspots do not tend to occur in urban centres, but rather

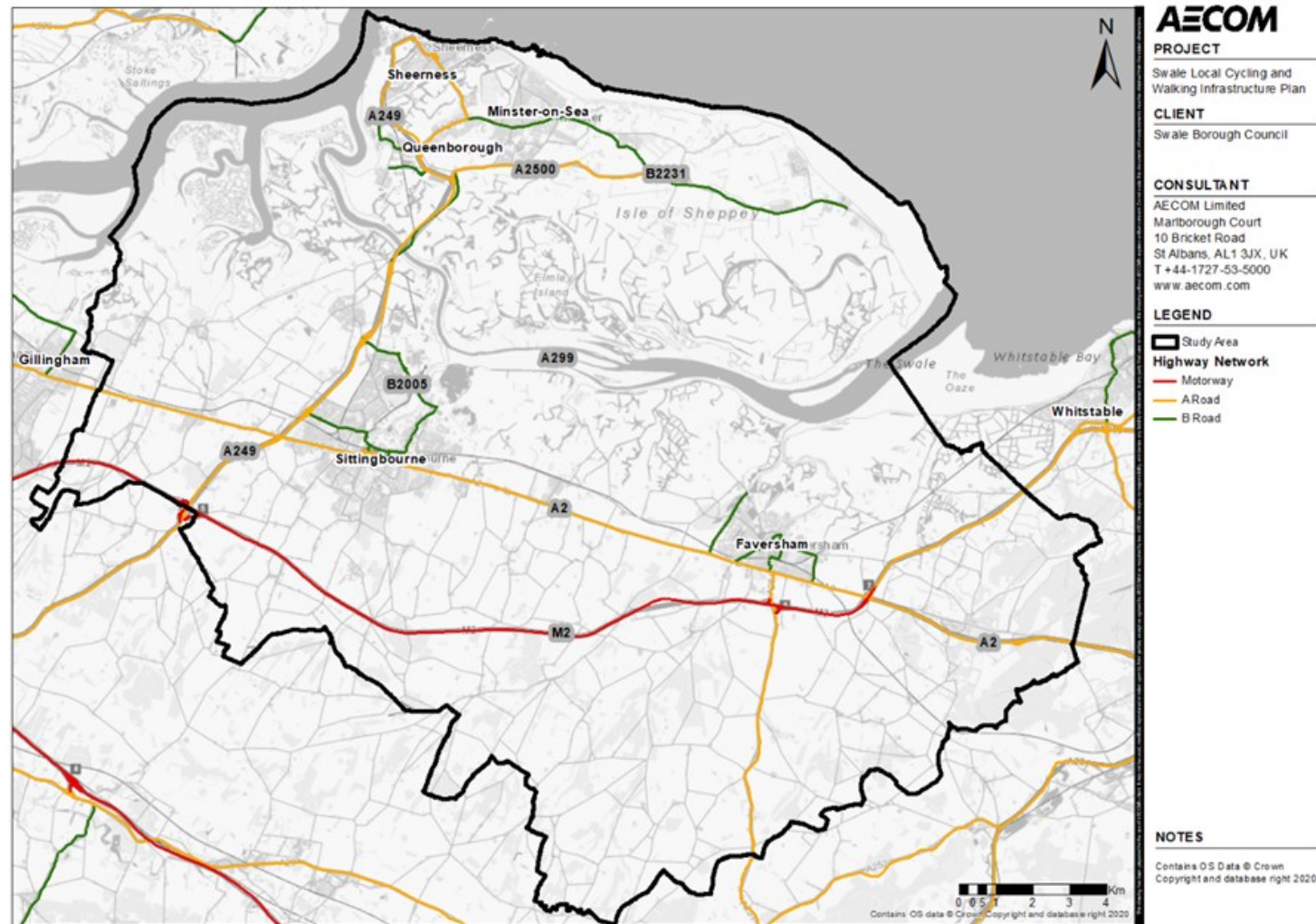


Figure 2-47 Highway Network Across Swale

along major roads or junctions with major roads.

During the period assessed, there were 144 incidents involving VRUs, of these, two were fatal, 37 were serious and 105 were slight.

[7] <https://www.theaa.com/about-us/newsroom/rural-roads>

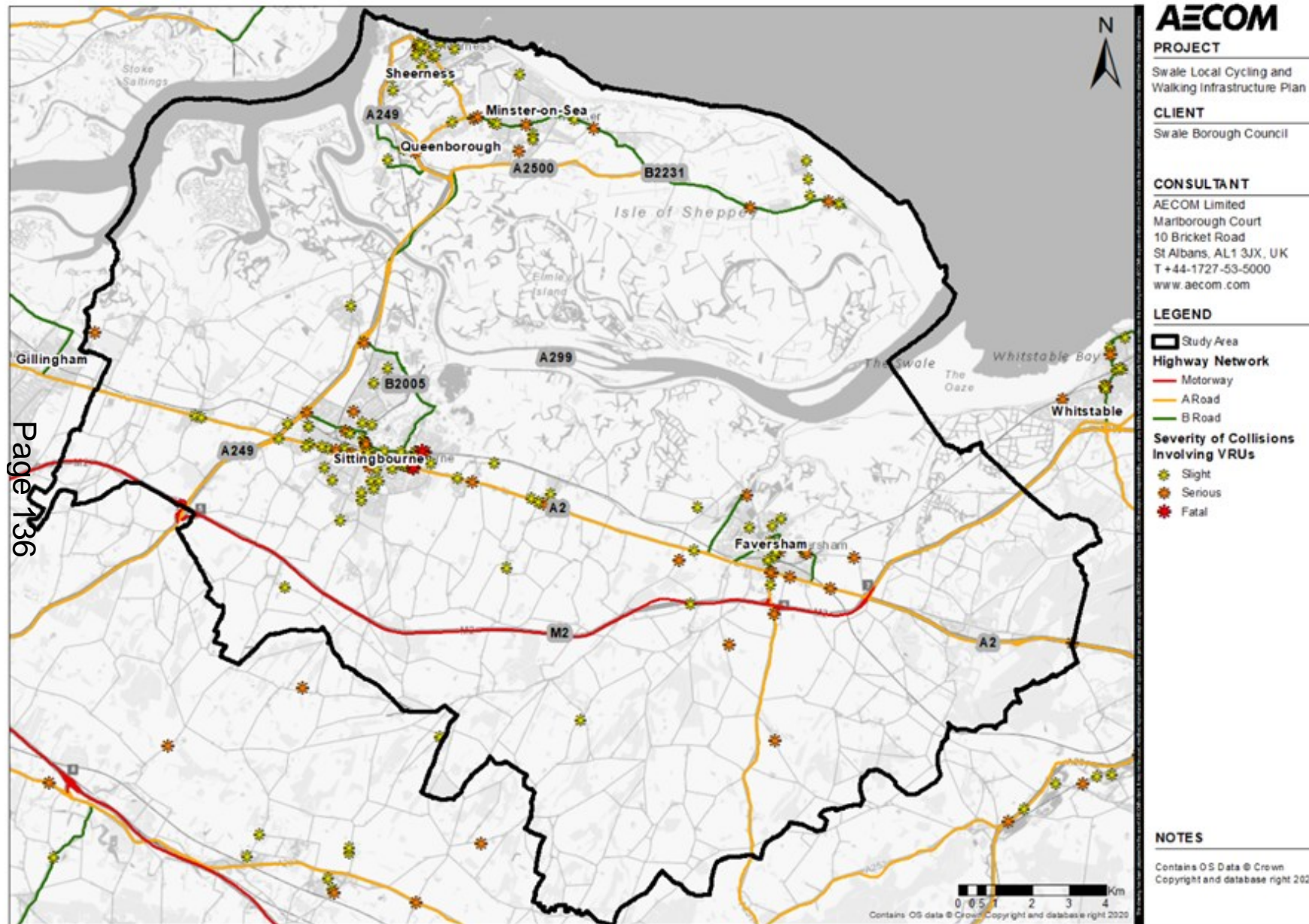


Figure 2-48 Highway Network and Collisions Involving Vulnerable Road Users Across Swale

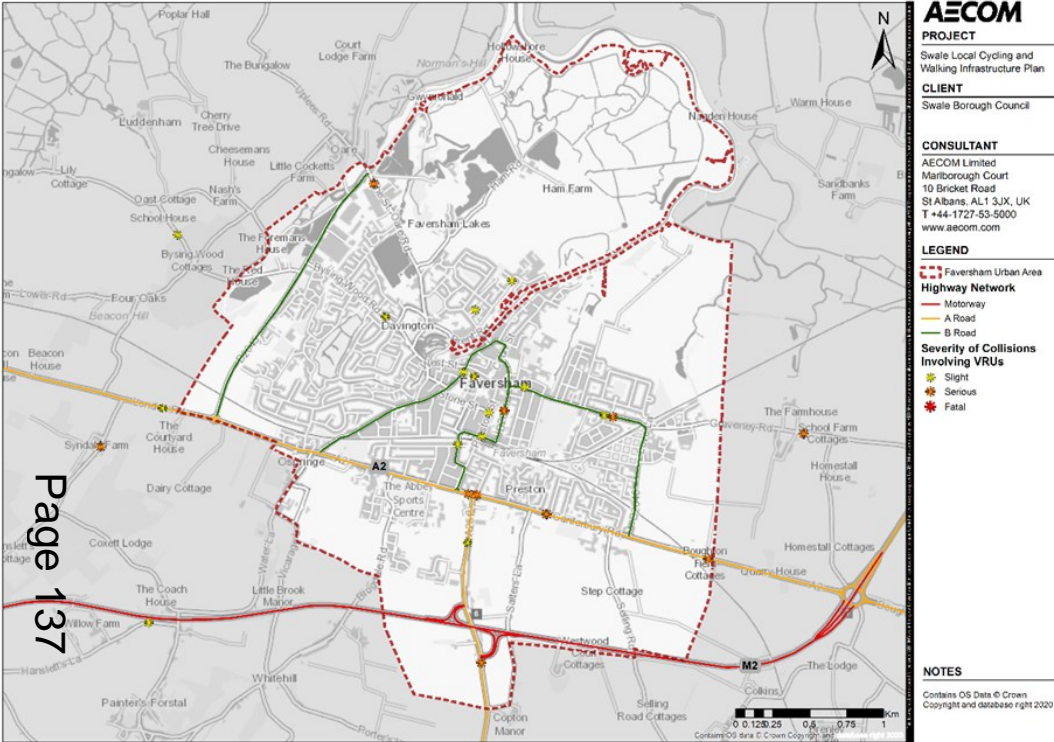


Figure 2-49 Collisions with Vulnerable Road Users - Faversham

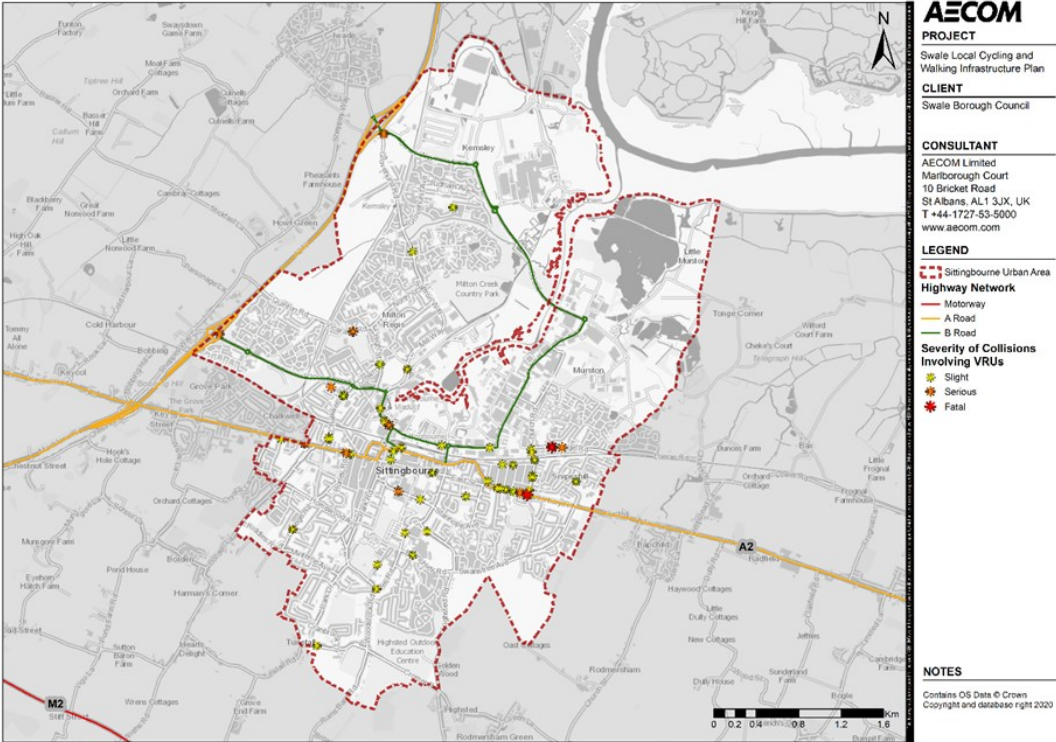


Figure 2-50 Collisions with Vulnerable Road Users - Sittingbourne

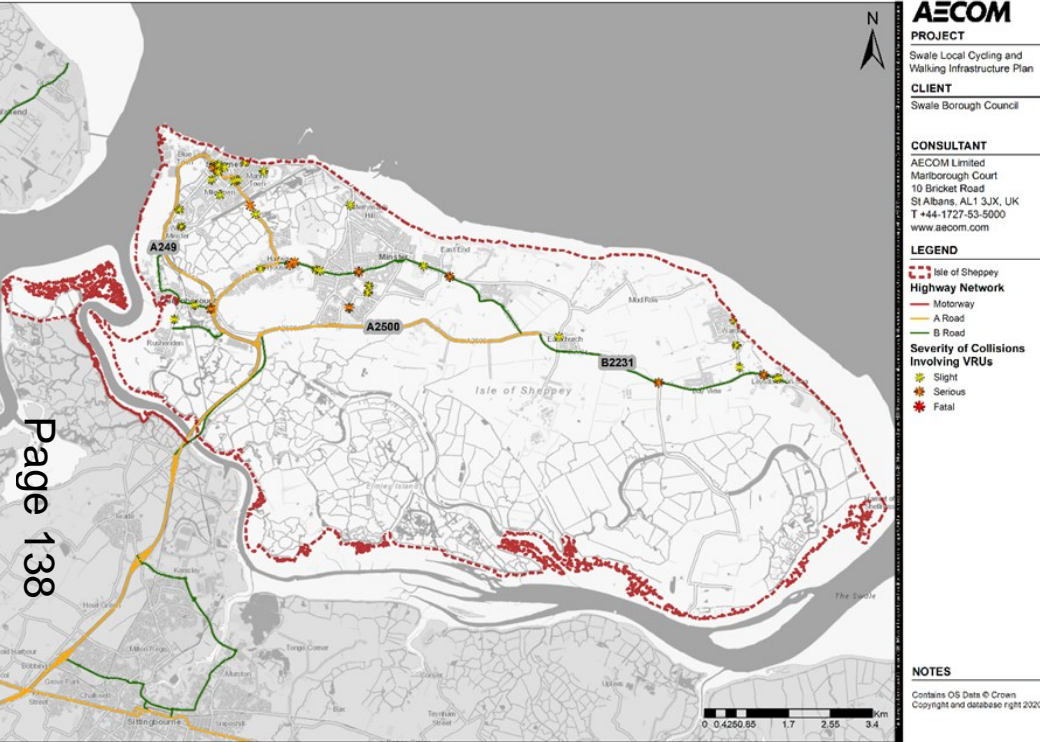


Figure 2-51 Collisions with Vulnerable Road Users - Isle of Sheppey

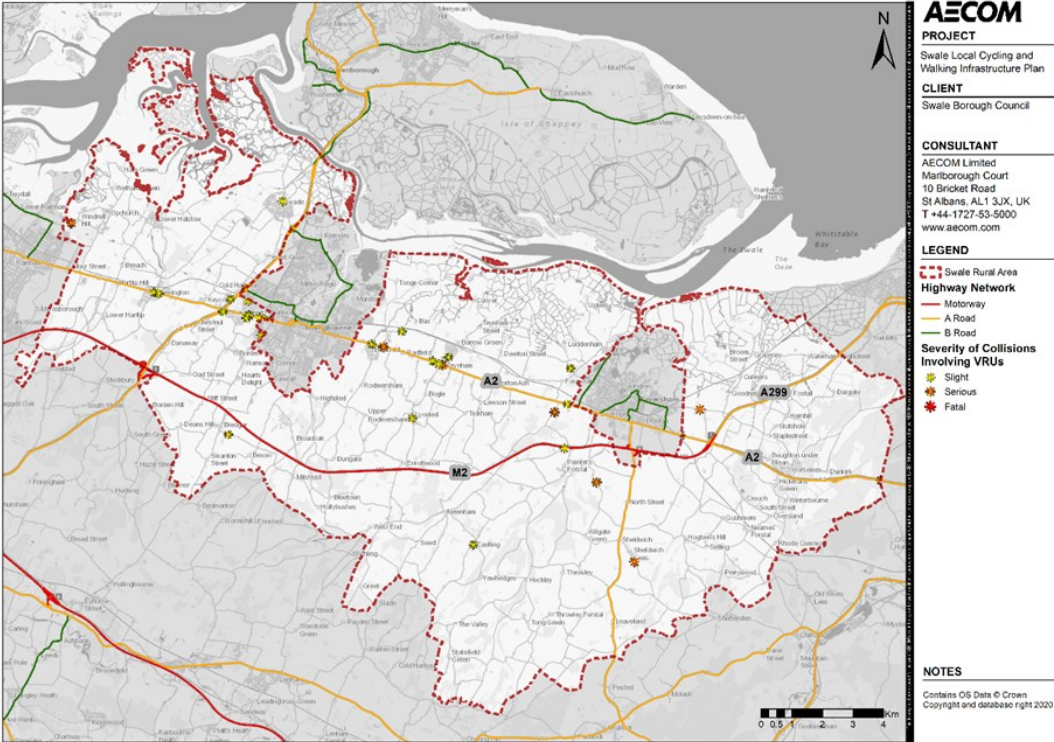


Figure 2-52 Collisions with Vulnerable Road Users - Rural Swale

Travel Patterns

Travel to Work

Data on the mode of travel to work, between the place of residence (origin) and the place of work (destination) of people across the UK, was collected as part of the 2011 and 2021 Censuses. This provides the most detailed journey pattern data currently available in the study area. These datasets were used to assess both mode split for travel to work and commuting travel patterns between an origin and destination across Kent.

The coronavirus (COVID-19) pandemic has led to major changes in commuter travel patterns across the UK and the latest (2021) Census was undertaken during the pandemic. The commuter travel pattern changes that occurred during COVID-19 restrictions have had long lasting effects and therefore 2021 Census has been included in this analysis with a caveat that commuting trips were heavily affected by travel restrictions during the time of survey.

Mode Split (Travel to Work)

Across Kent and nationally, 62.6% of employees travel to work in a car or a van. Across Kent, Swale has the highest proportion of employees who travel to work in a car or van. (66.7%). A full breakdown of the journey to work mode split data can be seen in Table 2-3. When comparing the method of travel to

Table 2-3 Method of Travel to Work in Swale

Mode	Swale - 2011	Kent - 2011	Swale - 2021	Kent - 2021
Work mainly at or from home	10.8%	11.2%	25.4%	31.1%
Rail	6.9%	9.2%	3.3%	3.7%
Bus	1.9%	3.7%	0.7%	2.1%
Private vehicle	67.9%	62.6%	60.0%	53.2%
Cycle	2.1%	1.7%	1.4%	1.2%
Walk	10.1%	10.0%	8.3%	7.8%
Other	0.4%	0.2%	1.0%	1.0%

work in Swale to Kent overall, the percentage share of cycling is higher, and those walking to work is approximately the same percentage share.

Figure 2-53 illustrates the commuting flows between districts in Kent. There are a lot of cross-district flows from Swale to Medway, with slightly fewer flows from Swale to Maidstone and to Canterbury, indicating cross-border desire lines from Swale. It is worth noting that this Figure does not include internal commuting flows, which on average across Kent make up 64.4% of all commuting flows.

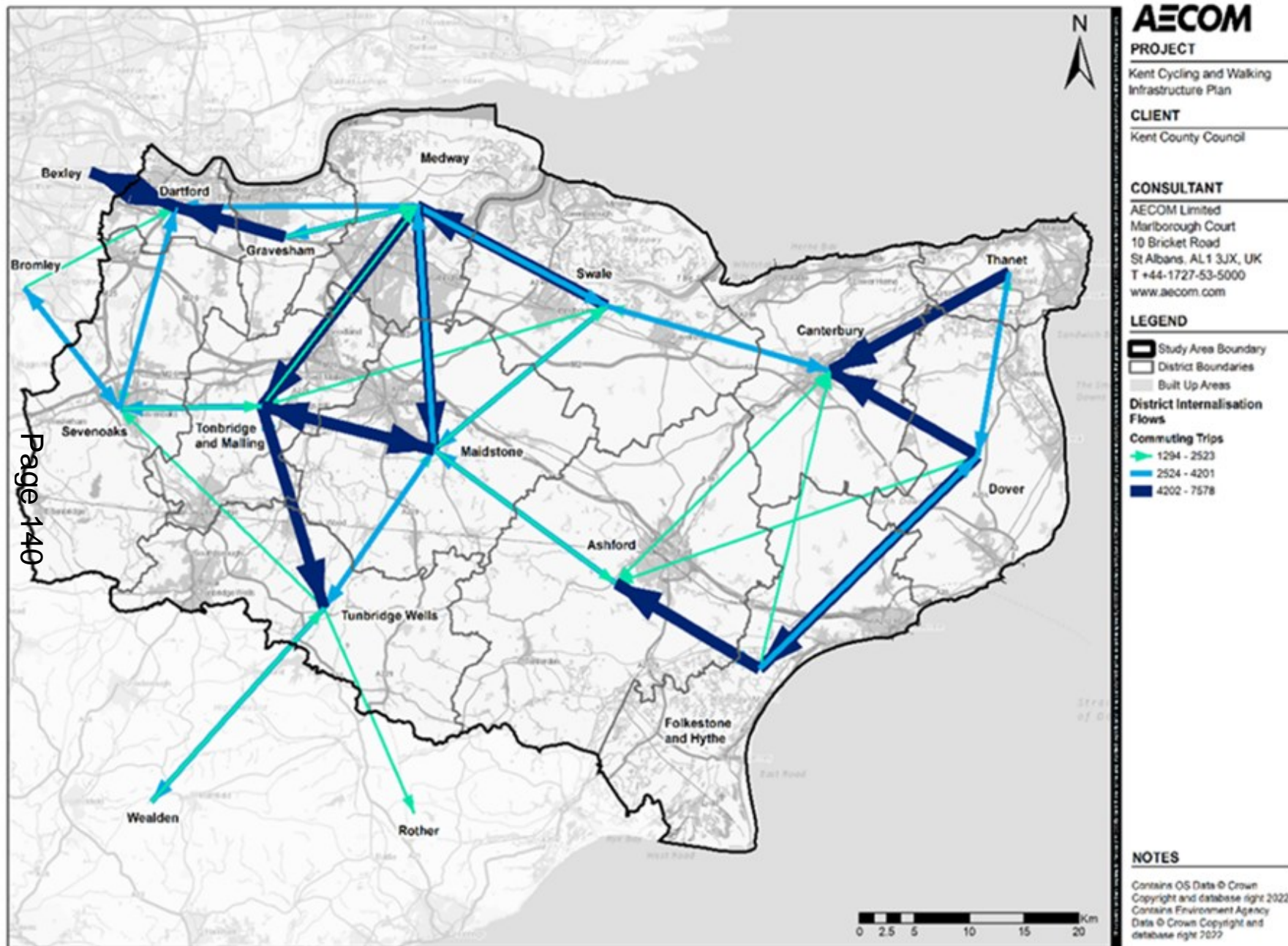


Figure 2-53 Origin and Destination Travel Patterns

Travel to School

It is crucial that well-connected, safe and accessible active travel routes to schools are considered where possible in order to encourage mode shift to and from schools. The location of schools and the pupils' numbers of each school can be seen in Figure 2-54.

Figure 2-55 also illustrates walking distances from schools and the existing cycle network to indicate the limited cycling provision in and around the schools in Swale.

The urban areas of the Sheppey Towns, Sittingbourne, and Faversham have the highest number of pupils. The large schools in Sheppey have limited cycle connectivity with some local cycle routes and lanes connecting smaller schools in Sheerness.

Sittingbourne has the greatest number of pupils, with some schools near the National Cycle Network (NCN) route 1. There is extremely limited cycle provision south of the A2 where the majority of pupils attend schools in Sittingbourne.

There are two large schools in Faversham, one of which lies on the NCN 1 route 1, providing pupils with an east-west route through Faversham. There are also two large schools on the Isle of Sheppey: Leigh in Minster (1,150 pupils) and EKC in Sheerness (750 pupils).

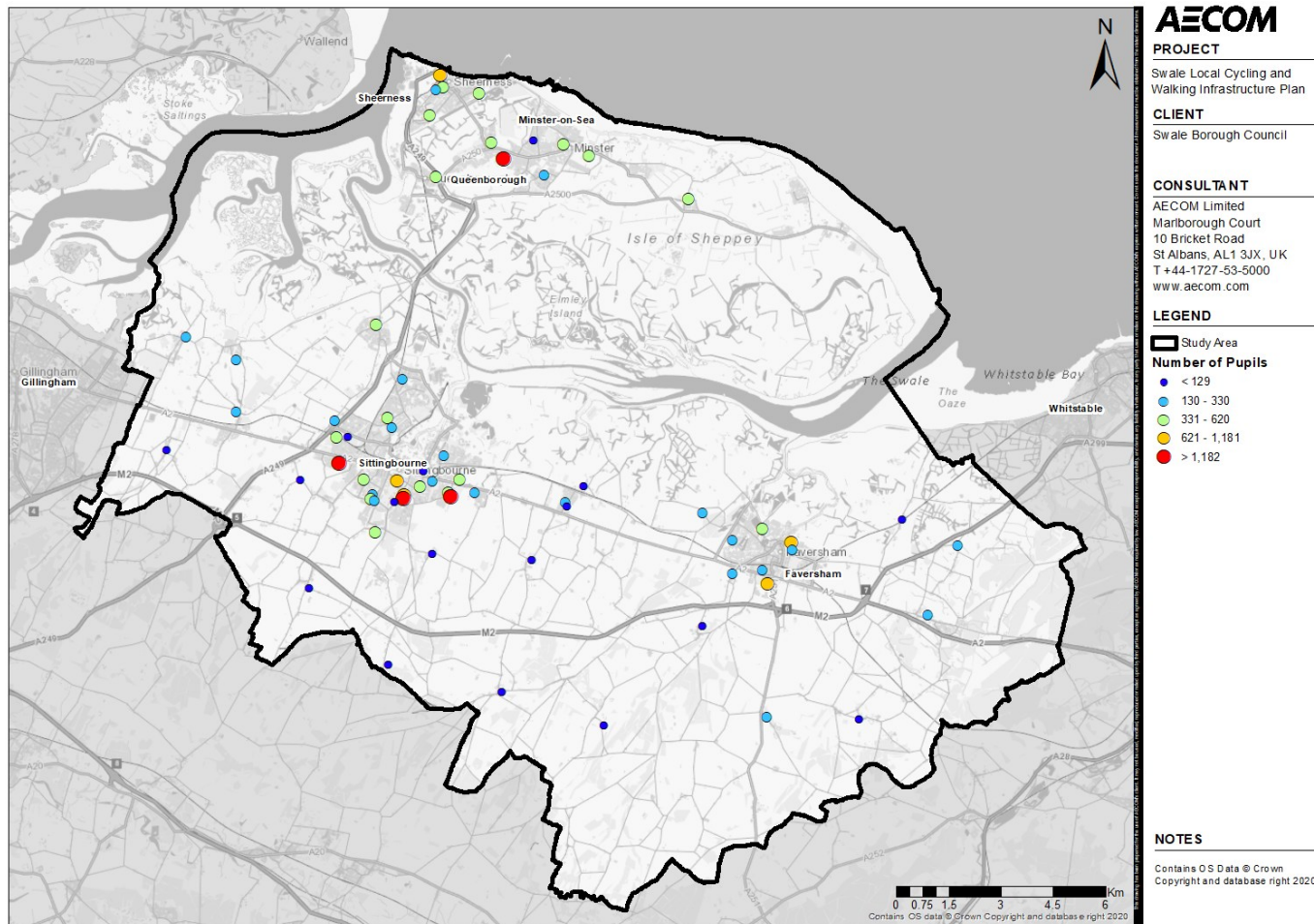


Figure 2-54 Education Sites Across Swale

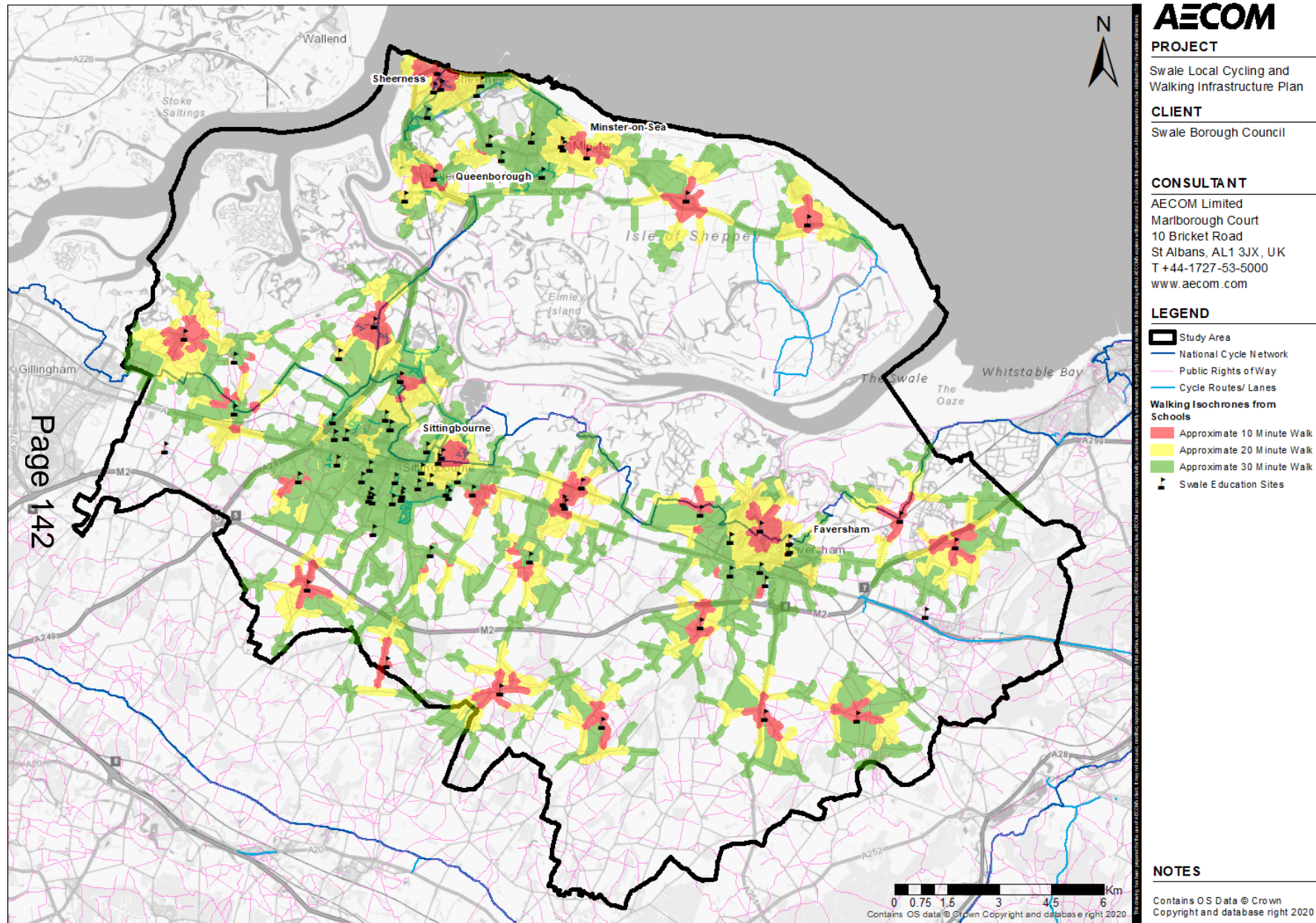


Figure 2-55: Walking Distances from Swale Education Sites

Tourism

Tourism is an increasingly important facet of Swale’s economy, with the visitor economy value estimated to be £173,481,000, and tourism-related employment accounting for 8% of all employment in Swale [8]. Table 2-4 illustrates the total tourism numbers by trip type. It can be seen that holidays comprise the majority of tourism trips to Swale, followed by visits to friends and relatives.

Table 2-4 Volume of Tourism by Trip Type Across Swale

Trip Purpose	Trips		Nights		Spend	
	Total	% Share	Total	% Share	Total	% Share
Holiday	139,400	54%	642,200	61%	29,452,600	75%
Visits to Friends and Relatives	110,800	43%	374,000	36%	6,701,300	17%
Other	6,000	2%	28,100	3%	2,378,000	6%
Business	2,000	1%	6,700	1%	744,100	2%
Total	258,200	100%	1,051,000	100%	39,276,000	100%

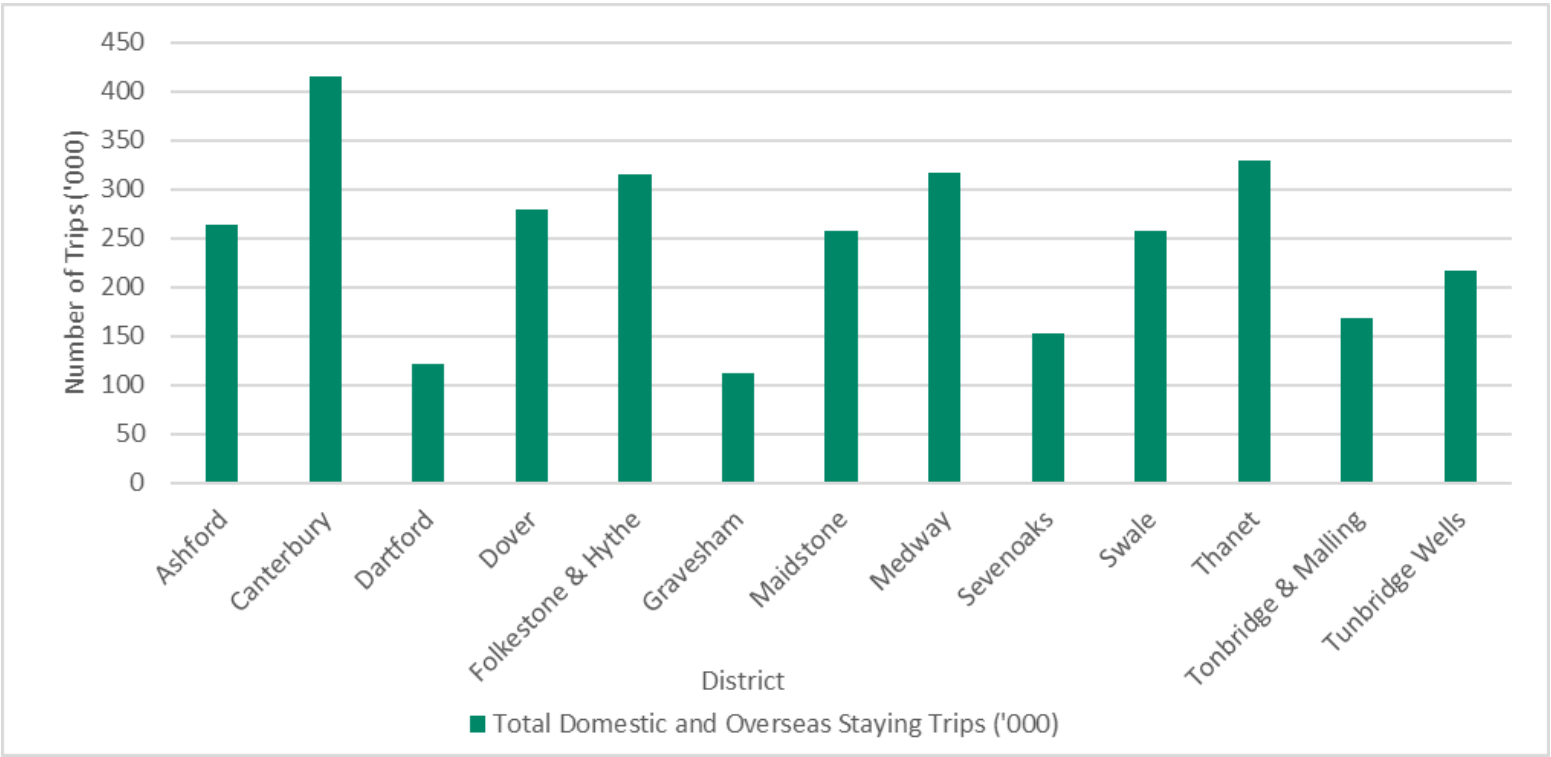


Figure 2-56 Total Domestic and Overseas Trips per District

[8] https://www.swalemeansbusiness.co.uk/_data/assets/pdf_file/0008/437264/Economic-Impact-of-Tourism-Swale-Report-2021.pdf

Perceptions of Existing Facilities

There were two key sources of information gathered to understand the perception of walking and cycling facilities across Swale: 'Widen my Path' and 'Your Everyday Trips'. These two sources of information are assessed in more detail below. 'Widen my Path' is an online open data portal through which one can leave feedback on the walking and cycling infrastructure. The 'Your Everyday Trips' survey was undertaken in summer 2022 by Visit Swale to better understand active travel patterns and barriers to walking or cycling.

As Figure 2-57 illustrates, there is a large number of 'Widen my Path' comments across Swale, largely concentrated in and around Faversham and Sittingbourne and to the north-west of the Isle of Sheppey. In total, 314 comments were received (as of 11/10/2023) and comments were classified into three categories: track, closure and cycleways. 115 comments were received in relation to tracks (wider footpaths and pavements), 52 in relation to closures (traffic filters to prevent things such as rat-running) and 147 in relation to cycleways (creating space on roads and junctions, segregated from vehicles). These can be seen in more detail in Figure 2-60. These comments have been considered at the stage of developing the interventions for the proposed routes.

The 'Your Everyday Trips' survey was another

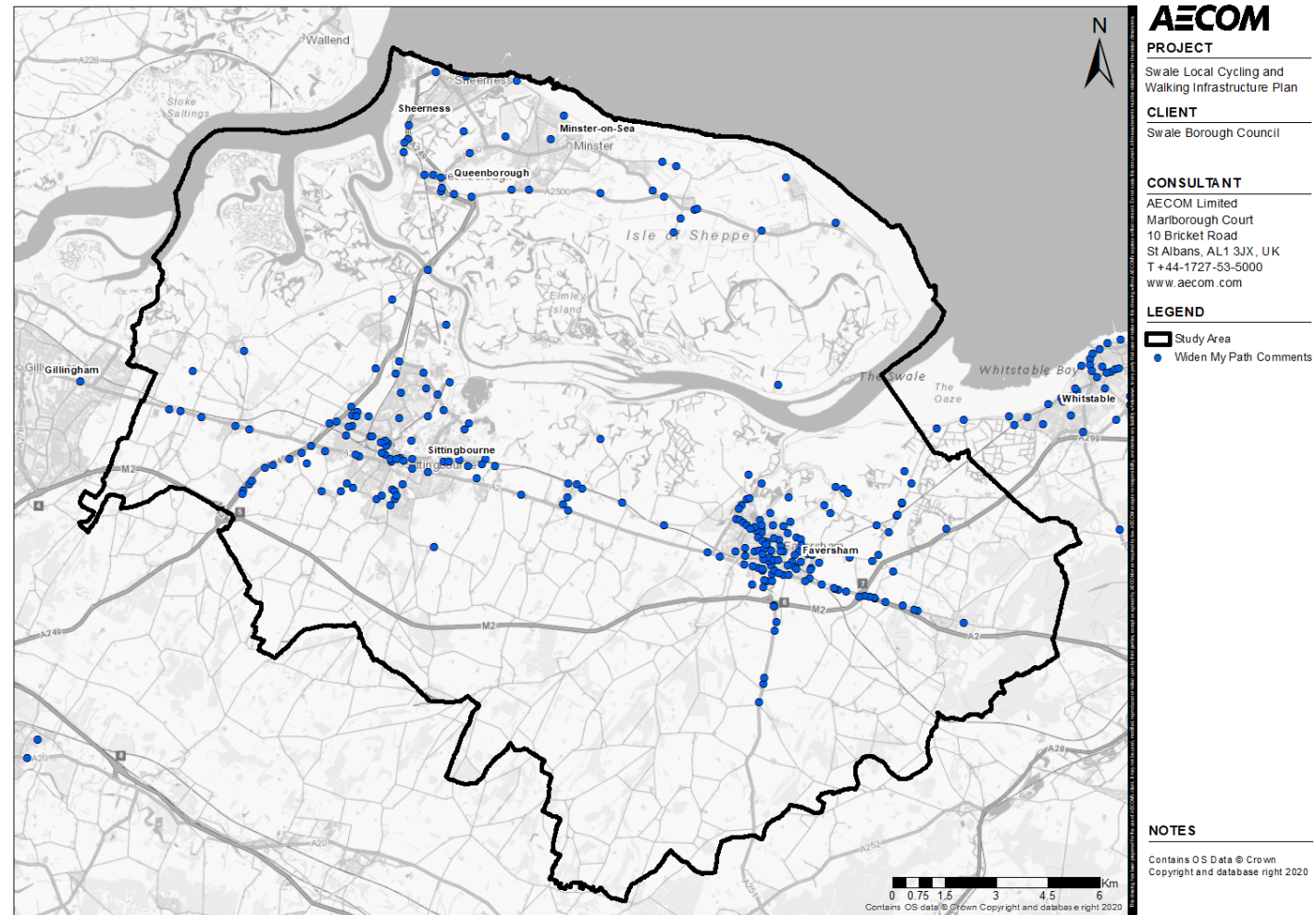


Figure 2-57 Location of 'Widen my Path' Comments Across Swale

source of information to better understand perceptions of existing facilities across Swale. Respondents were asked about their access to various travel modes, whether they use a car for their typical everyday trips,

and if so, whether they would consider making this trip using active modes. Respondents were also asked what they consider barriers to carrying out their everyday trips by walking, cycling or wheeling.

Figure 2-58 to Figure 2-60 illustrate the responses received to the survey in more detail. Notably, the vast majority of respondents primarily had access to a car or van, which suggests private car users are over-represented in this survey, and only 16% of respondents reported that they would use active modes for their everyday journey. The reasons for this are provided in Figure 2-60, which includes reasons such as their trips being too far to walking or cycle, or safety concerns.

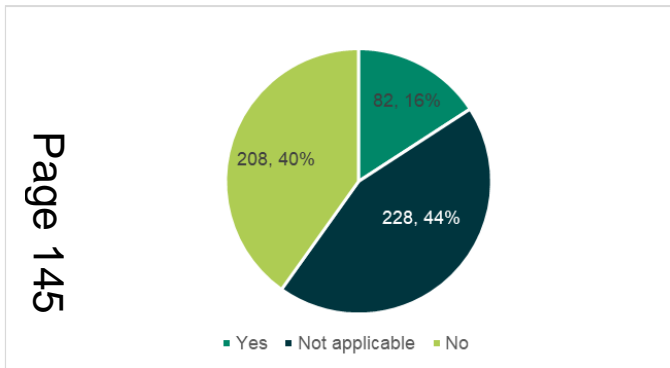


Figure 2-59 'Your Everyday Trips': Number of respondents who use a car for their everyday trip, and would consider doing it by walking, wheeling or cycling

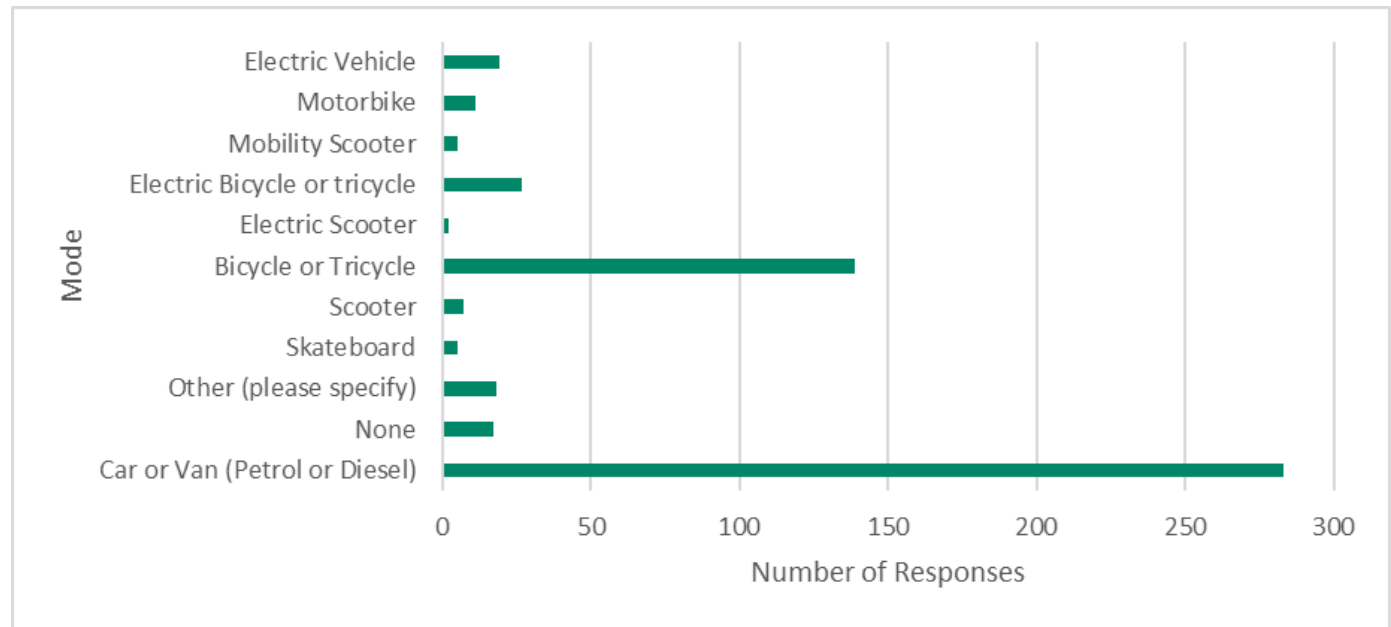


Figure 2-58 'Your Everyday Trips': Respondents' Access to Travel Modes

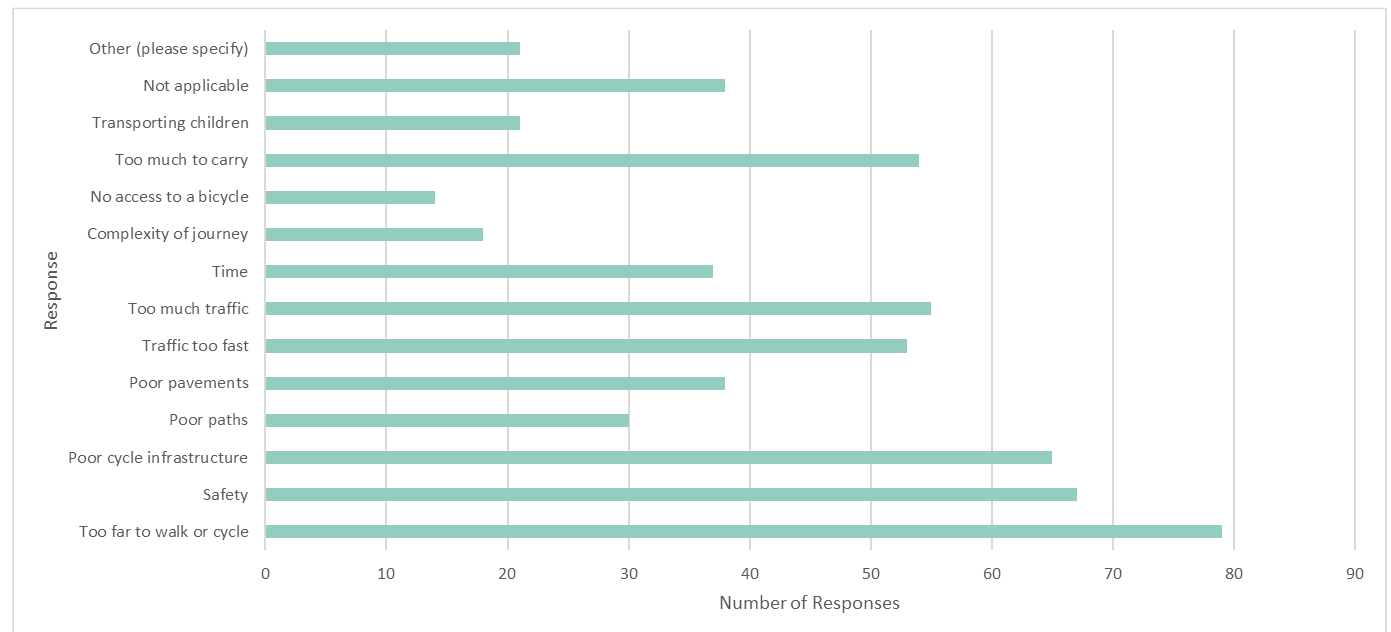


Figure 2-60 'Your Everyday Trips': Barriers to carrying out walking, cycling and wheeling

Active Travel Flows and Demand

Strava Metro Data

Strava Metro data has been obtained to identify key origin and destination patterns for active travel across Swale. The data is from GPS information that is available when users track their physical activity on Strava application. It is then aggregated and displayed as origins and destinations.

It is worth noting that this sample size is potentially relatively small. Exercise trips or longer distance commuting journeys are more likely to be recorded on Strava than general utility and day-to-day journeys, therefore this analysis should be used in conjunction with other active travel demand data as an indication of flows across Swale.

Data has been obtained for walking and cycling origins and destinations (as shown in Figure 2-61 to Figure 2-64). It can be seen that for both walking and cycling, key origins and destinations concentrate around Sittingbourne, Faversham and the villages of Minster-on-Sea, Sheerness and Queenborough on the Isle of Sheppey. Across all figures, the cycling destinations indicate the most variance in spatial location, with a number of trips being located across rural Swale.

Figure 2-61 highlights the most frequent routings of cyclists across Swale. STRAVA Heatmap does not provide actual user counts and should therefore only be used as an indic-

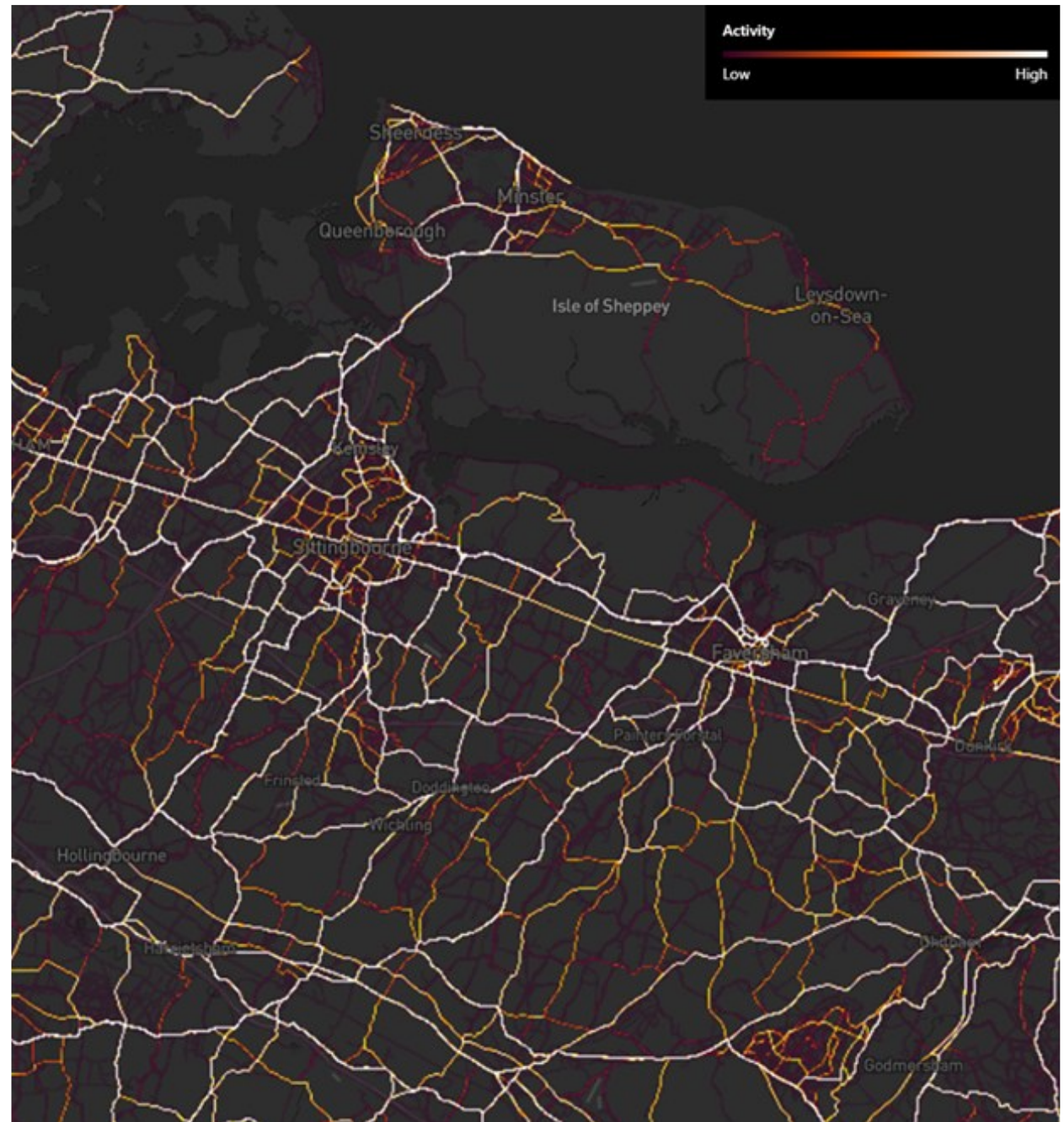


Figure 2-61 Strava Global Heatmap Rides (Cycle Flows) in Swale

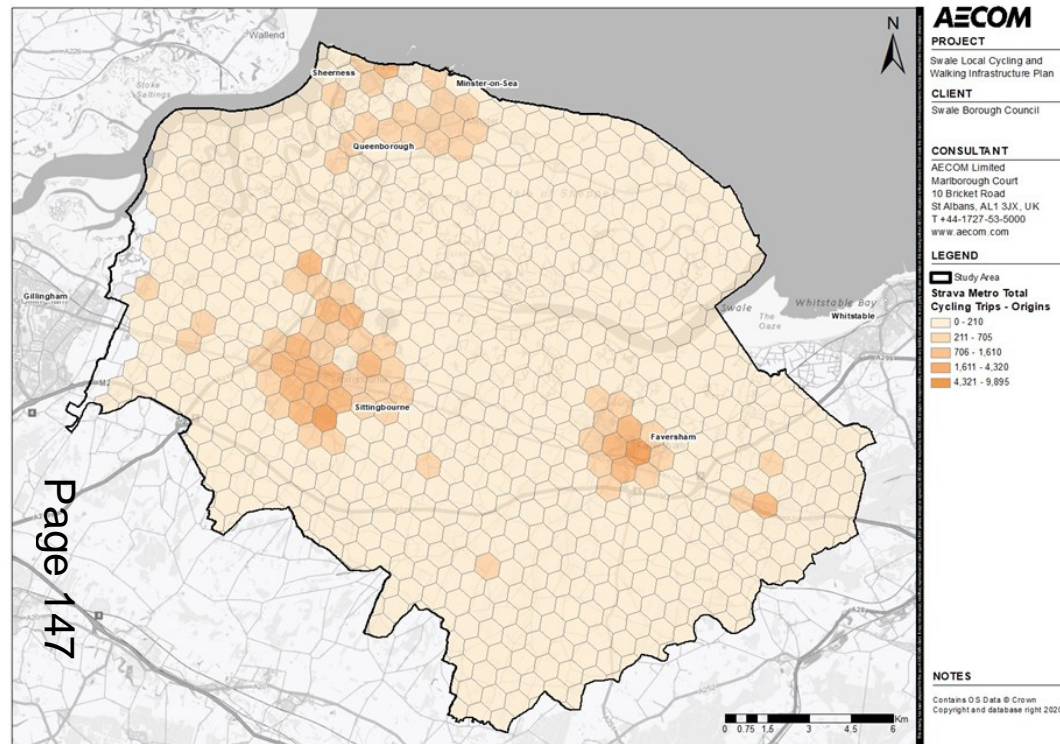


Figure 2-62 Strava Metro Cycling Origins Across Swale

ative visual tool. It shows 'heat', built by the number of active travel journeys which have been recorded on different routes. The flows demonstrate that while there is significant cycle activity within urban areas, there are also significant flows along inter-urban routes.

ings. There are high flows of cycle trips recorded between Faversham, Sittingbourne and the Isle of Sheppey. It should be noted that STRAVA users typically record journeys for leisure purposes and therefore more regular commuting trips may be underrepresent-

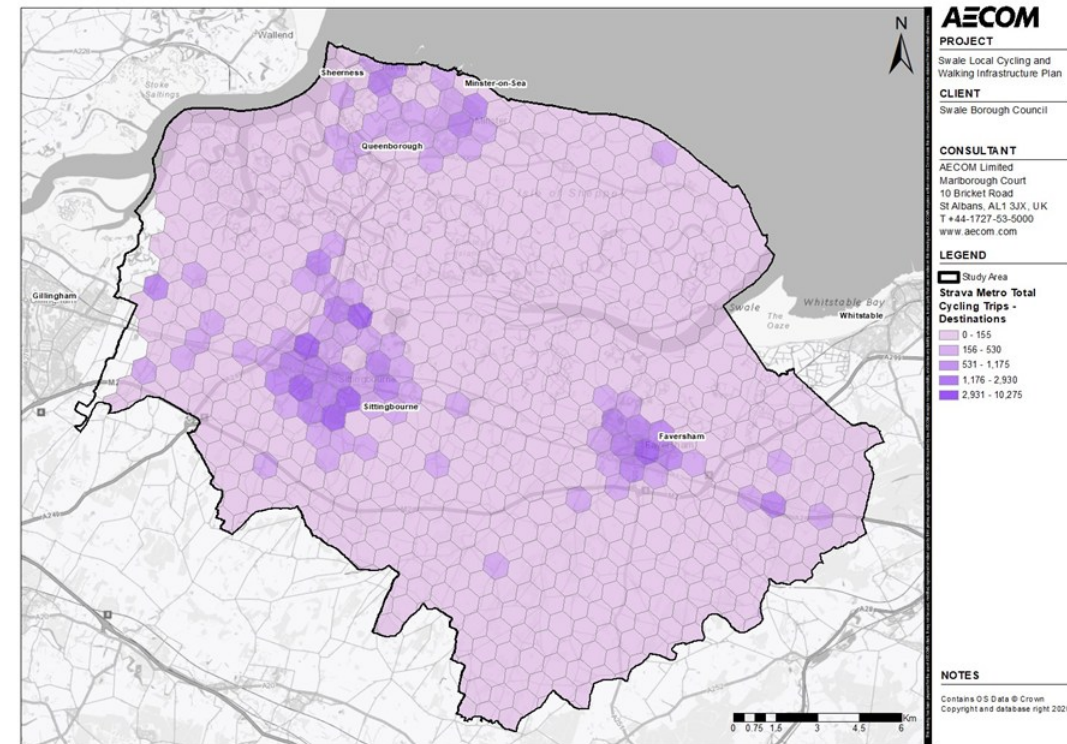


Figure 2-63 Strava Metro Cycling Destinations Across Swale

ed. Cyclist flows generally follow the highway network in the District but avoid busier stretches of the network. For example, between Faversham and Sittingbourne there are higher flows along Lower Road than the A2 (London Road).

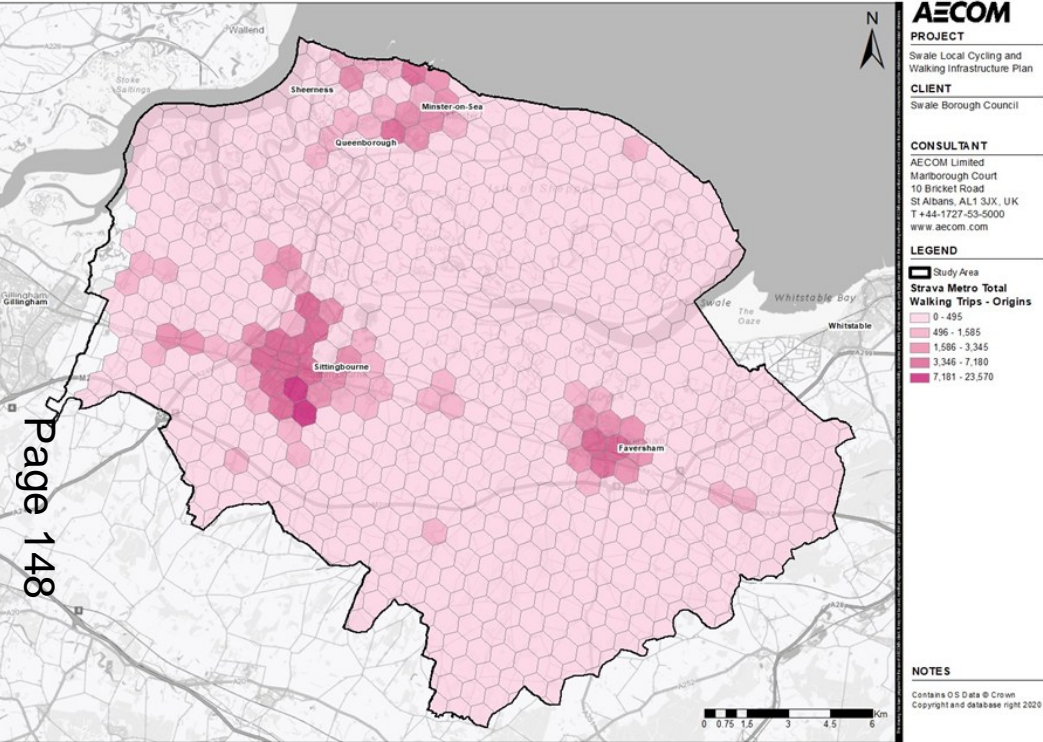


Figure 2-64 Strava Metro Walking Origins Across Swale

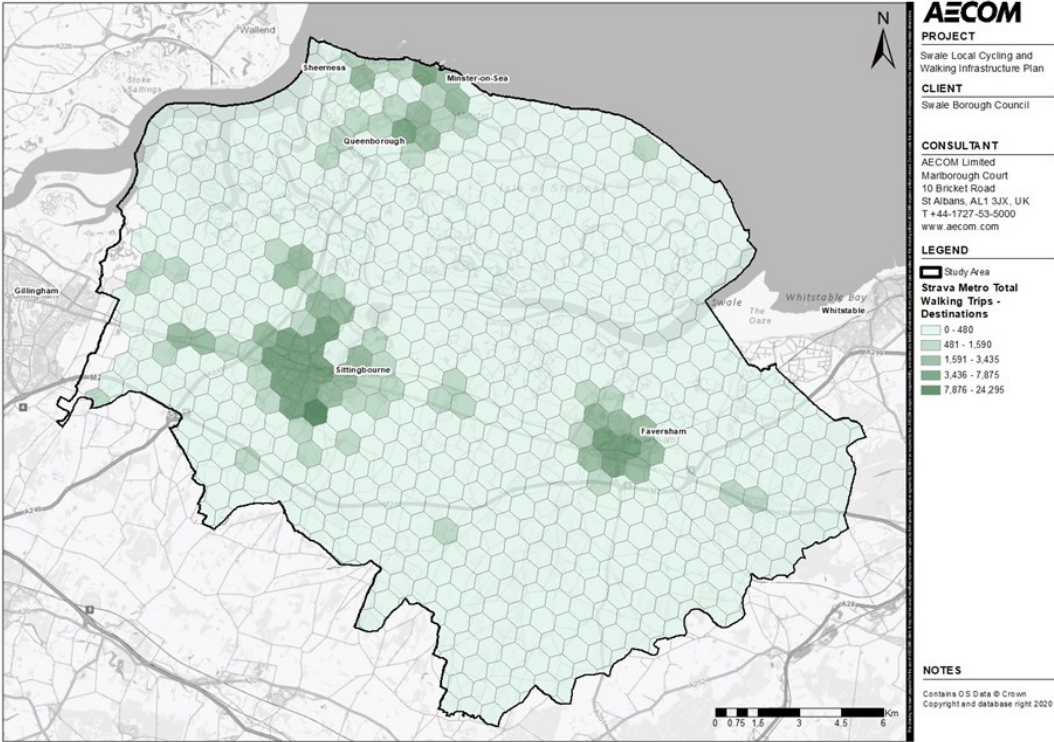


Figure 2-65 Strava Metro Walking Destinations Across Swale

Propensity to Cycle Tool

The Propensity to Cycle Tool (PCT) [9] is a Department for Transport funded tool which uses origin-destination data to explore and map cycling levels of both existing and potential future commuters based on a number of scenarios. The two scenarios used within this analysis are the following:

- The Census 2011 scenario: demonstrates the baseline cycle flows based on the 2011 Census
- The 'Go-Dutch' scenario: demonstrates what could happen if areas had investment to build the same infrastructure and cycling culture equivalent to the Netherlands.

The PCT results are person-based, rather than trip-based and therefore represent the numbers of people commuting, based on their typical main mode of travel.

Figure 2-66 to Figure 2-67 illustrate the cycle flows based on the three above-mentioned scenarios.

The Census 2011 scenario shows relatively low levels of cycling between towns on the Isle of Sheppey and also between Sittingbourne and Faversham, typically with fewer than 6 users. There are several routes within Sittingbourne and Faversham which experienced 6 – 13 users, with only one road between Sheerness and Queenborough experiencing more than 13 users.

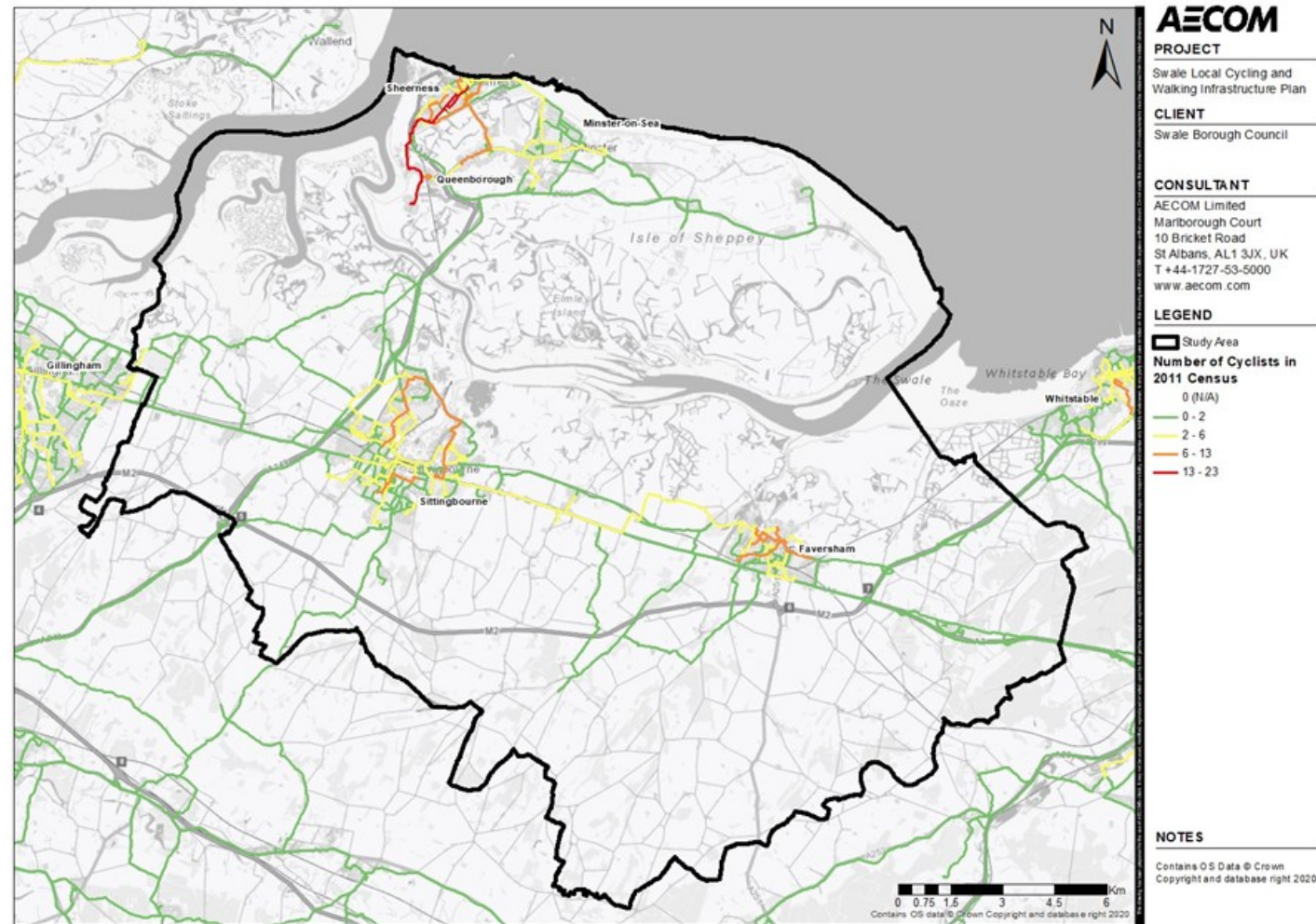


Figure 2-66 PCT Tool: Census 2011 Scenario

[9] <https://www.pct.bike/m/?r=kent>

In the Go Dutch scenario, there are rural and urban areas which would be expected to experience significant uplift in cycle flows, notably, Sittingbourne, Faversham and Sheerness would experience flows of up to 80 cyclists. There is also expected to be significant increase in cyclists travelling east-west on the Isle of Sheppey, as well as more rural flows (albeit relatively low flows).

A limitation of the PCT is its focus on commuting and school trips, therefore the existing and future routes are concentrated around key employment and education sites. The PCT results were used alongside an analysis of non-commuting and leisure trips to enable the development of a cycle network that also includes leisure and recreation trips.

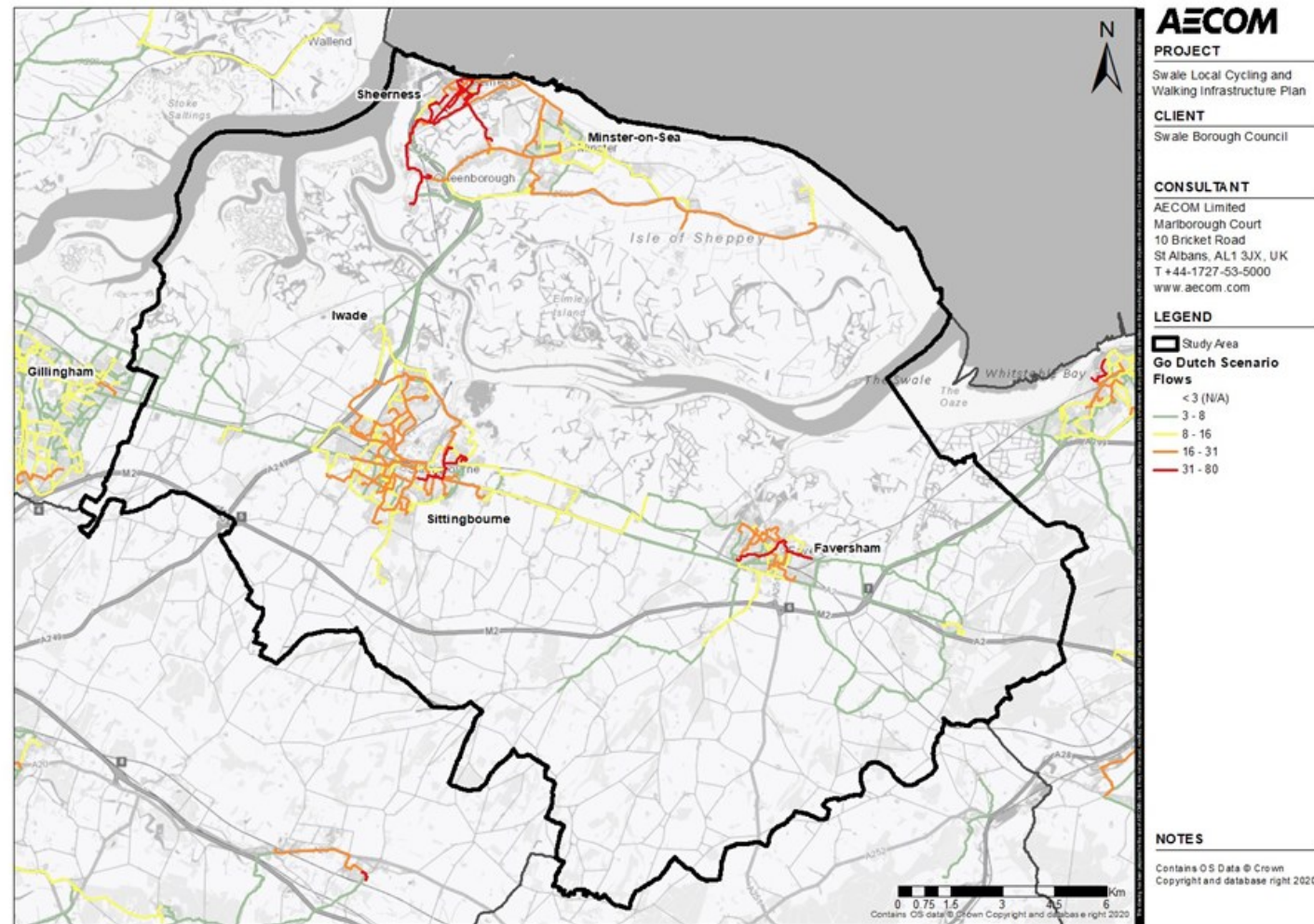


Figure 2-67 PCT Tool: Go Dutch Scenario

VISUM Flows

VISUM is a transport modelling software which was used to build the Kent Transport Model. Flows of all transportation user classes have been exported from the Kent Transport Model in base year (2019) and future year (2037) scenarios.

Comparing the base year and future year scenario flows provides an indication of how travel demand patterns are likely to change in the Swale based on the background population growth, the completion of new developments, and all other growth factors considered in the transport model.

Given that the transport model considers all user classes, only flows <10km were considered as part of this study. These are the trips that are within a typically cyclable distance and are either cycled presently or are significant desire lines which have a high potential for achieving modal shift.

Figure 2-68 and Figure 2-69 shows the PM peak in the 2019 base year and 2037 future year. The highest volume of flows is located in Faversham, Sittingbourne and between the towns of Minster-on-Sea, Queensborough and Sheerness on the Isle of Sheppey. It can be noticed that there is significant amount of relatively short car trips around Sittingbourne, including between Newington and Borden.

Flows are expected to increase significantly in the future year scenario. Sittingbourne is a lo-

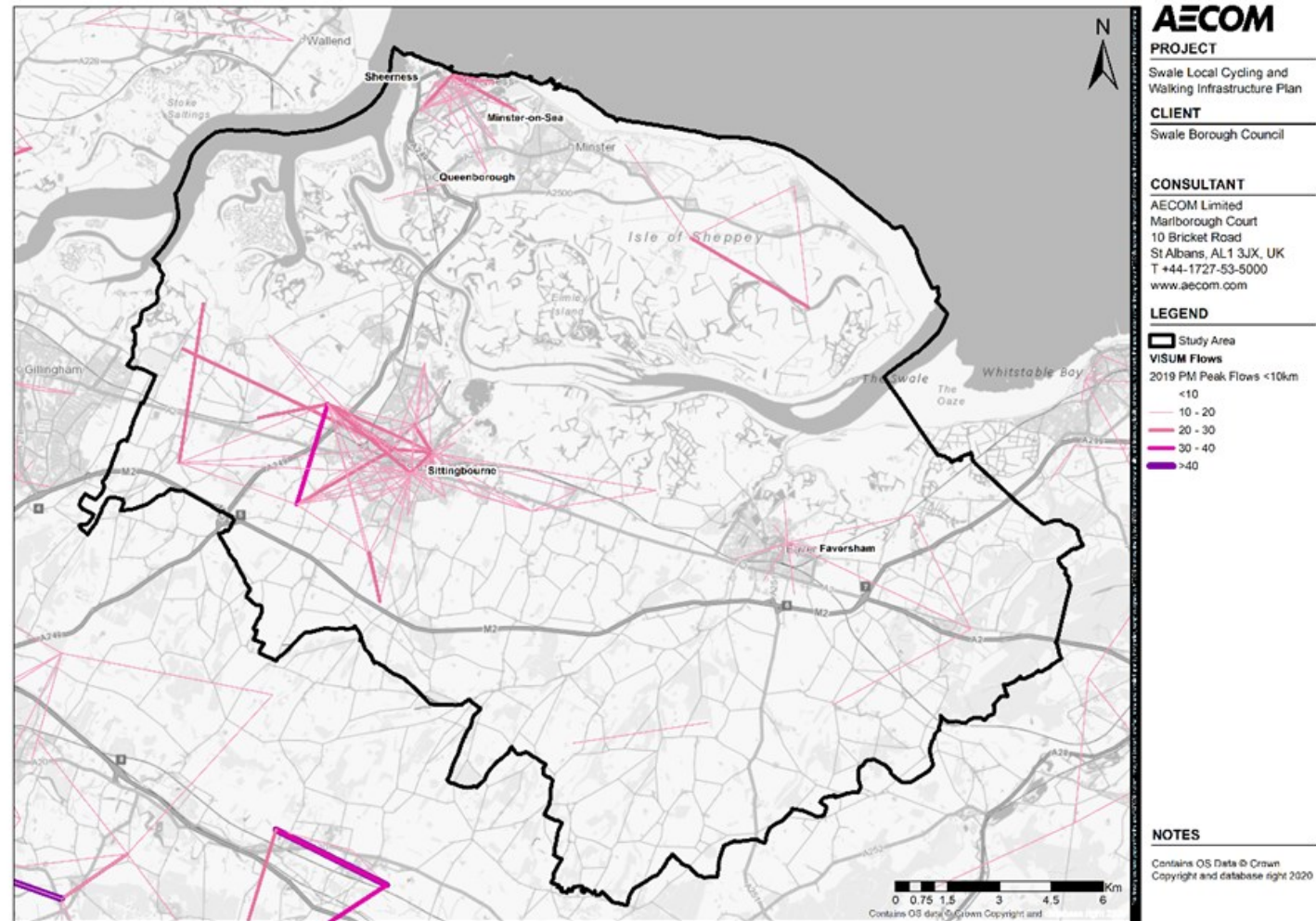


Figure 2-68 VISUM 2019 PM Peak Flows - All User Classes

cation with notable increases in flow and with in the future scenario there are multiple flows modelled with >40 users. Although the flows remain low in comparison to the intra-urban flows, there are increases modelled on many inter-urban flows in Swale in the 2037 future year scenario and also flows to and within more rural areas. Demand is predicted to increase on both the Isle of Sheppey and in rural Swale. This indicates potential future demand for cycling in these locations.

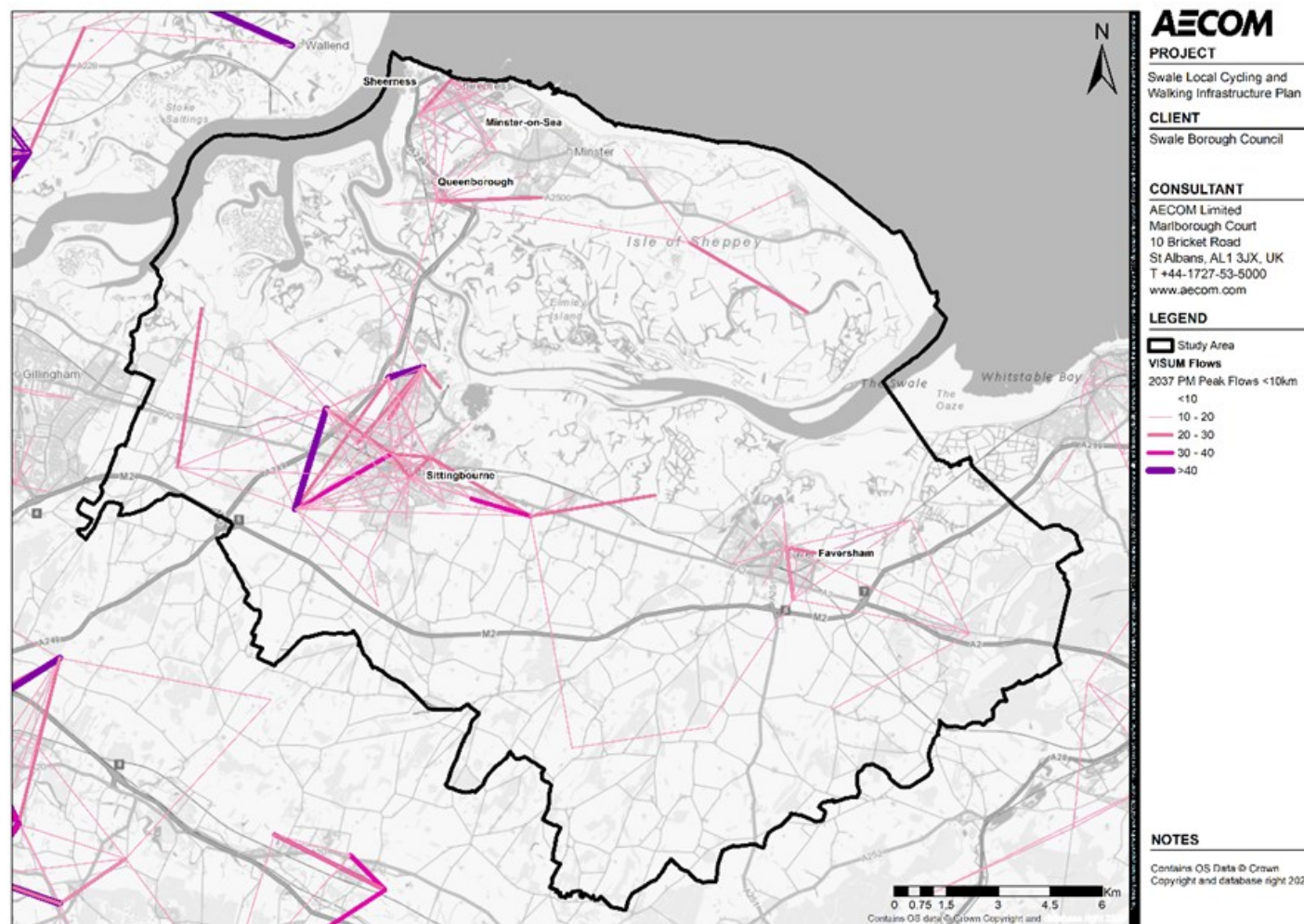


Figure 2-69 VISUM 2037 PM Peak Flows - All User Classes

Physical Constraints and Severance Features

Topography

The topography (illustrated as elevation) in Swale can be seen in Figure 2-70. Flood zones are also depicted on the map. Flood Zone 2 represents areas with a medium probability of flooding, while Flood Zone 3 represents areas with a high probability of flooding.

The topography across Swale is extremely diverse, with high east-west elevation south of Swale which forms part of the North Downs. The Isle of Sheppey, in contrast is characterised by low-lying land, covered by Flood Zone 2.

Topography, or the physical landscape of an area, can significantly affect people's propensity to cycle and walk. Additionally physical constraints and severance can impact the feasibility of constructing new infrastructure.

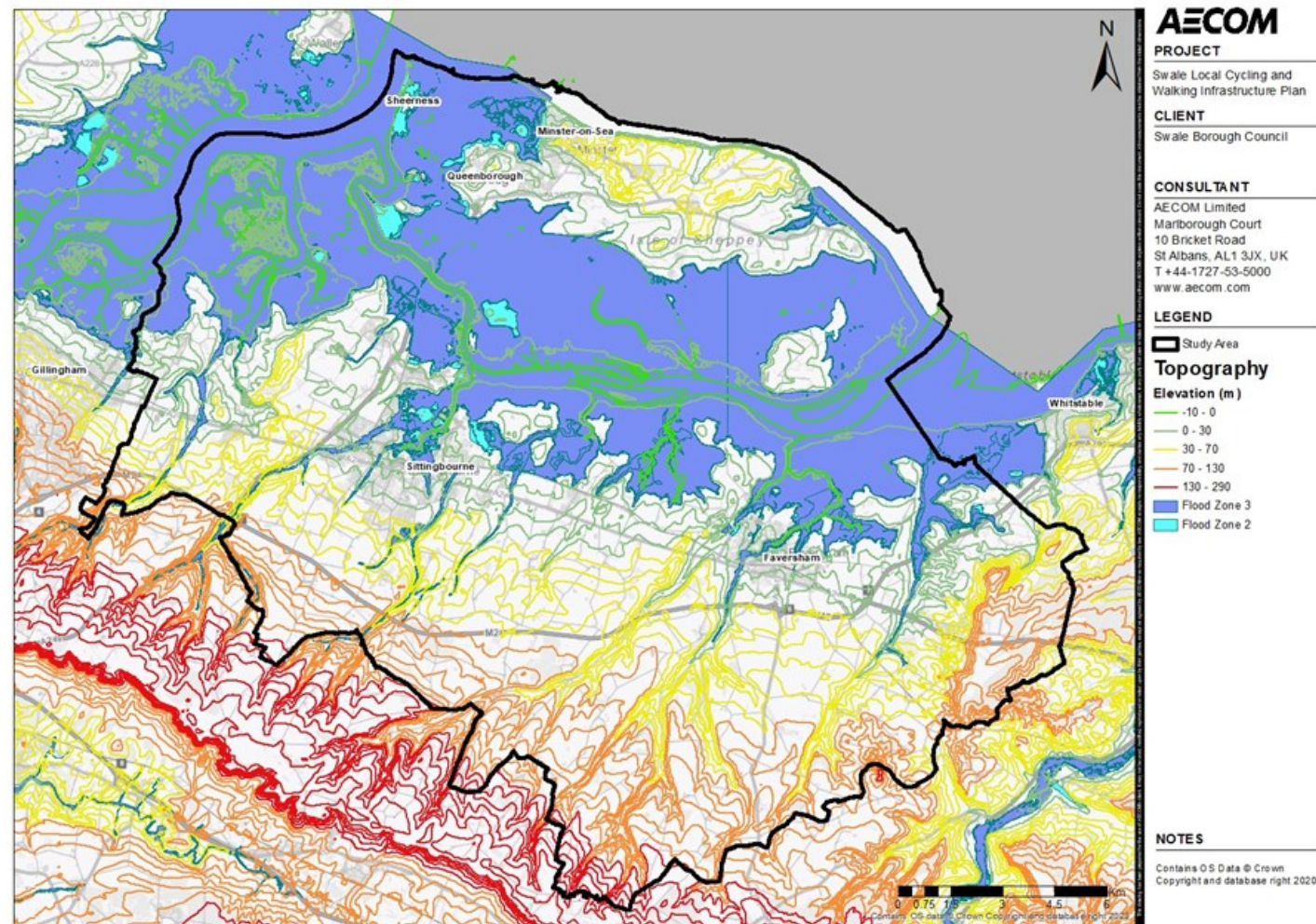


Figure 2-70 Topography Across Swale

Air Quality

The below data discusses concentrations of nitrogen dioxide at various monitoring sites across Swale from the 2023 Air Quality Annual Status Report (ASR) [10]. The average annual concentration of nitrogen dioxide (NO₂) in the air is measured in micrograms per cubic meter (µg/m³). Concentrations above 40 µg/m³ are considered an exceedance of the annual mean NO₂ as set out in the objectives of the National Air Quality Strategy [11]. In response to this, local authorities have identified Air Quality Management Areas (AQMAs).

These are areas for which the local authority is developing an Air Quality Action Plan to improve air quality and reduce pollution levels within a designated area. The AQMAs across Swale can be seen in Figure 2-71.

Swale Borough Council has declared six AQMAs at the following locations [12]:

- AQMA 1: Newington, (A2 / High St) - declared in 2009
- AQMA 2: Ospringe Street, Faversham (A2/Ospringe) declared in June 2011 and 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
- AQMA 3: East Street, Sittingbourne (A2 / Canterbury Road) - declared January 2013;
- AQMA 4: St Paul's Street, Milton, Sit-

Table 2-5 NO₂ concentrations at AQMAs across Swale (December 2023)

AQMA	Compliance with Air Quality Objective	Recommendation from 2023 ASR
AQMA 1 - Newington	Yes (3 years)	Ongoing monitoring
AQMA 2 – East Street	Yes (4 years)	Revoke AQMA
AQMA 3 – St Paul's Street	Yes (3 years)	Ongoing monitoring
AQMA 4 – Teynham	Yes (5 years)	Revoke AQMA
AQMA 5 – Ospringe Street	Yes (3 years)	Ongoing monitoring
AQMA 6 – Keycol Hill	No	Ongoing monitoring

tingbourne (B2006) - declared January 2013 – October 2020 an amendment was made to include PM₁₀ exceedances (24 hr mean) in addition to the NO₂ exceedance (annual mean)

- AQMA 5: Teynham (A2 / London Rd) - declared December 2015
- AQMA 6: Ospringe Street, Faversham (A2/Ospringe) (revised from AQMA 2) to the Mount in May 2016
- AQMA 7: Keycol Hill – declared October 2020

Swale Borough Council has undertaken monitoring of these AQMAs to assess NO₂ and PM₁₀ levels at the 6 AQMAs. Results published in December 2023 indicate an overall improvement in NO₂ at all sites. The only exceedance reported was at Keycol Hill,

and all other sites were reported as compliant with the required objective NO₂ level of 40 µg/m³. The results of the monitoring undertaken and the associated recommendation for each AQMA can be seen in Table 2-5.

[10] https://swale.gov.uk/__data/assets/pdf_file/0005/457835/ASR-2023_Final_24_10_2023_updated-PDF-AA.pdf

[11] <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england-scotland-wales-and-northern-ireland-volume-1>

[12] <https://swale.gov.uk/bins-littering-and-the-environment/air-quality/monitoring>

As NO₂ monitoring has been undertaken using diffusion tubes, to account for the associated uncertainty with this monitoring method, it is recommended that revocation of an AQMA should be considered following three consecutive years of annual mean NO₂ concentrations being lower than 36 µg/m³ – within 10% of the annual mean NO₂ objective.

According to DEFRA guidance, the AQMAs on East Street and Teynham qualify for revocation, whereas monitoring for the other AQMAs is required as they have not seen three consecutive years of annual mean NO₂ concentrations being lower than 36 µg/m³.

Swale Borough Council has an extensive network of air quality monitoring sites across the district, comprised of 86 NO₂ diffusion tubes deployed at 76 locations. In 2022, one diffusion tube picked up an annual mean NO₂ exceedance, compared to 13 in 2019.

Across Swale, areas of air quality exceedances in Swale are in town centres near busy roads. Encouraging modal shift to cycling and walking has the potential to reduce NO₂ emissions by reducing vehicle traffic and congestion.



Figure 2-71 AQMAs Across Swale

03

Stage 3: Network Planning for Cycling

Stage 3: Network Planning for Cycling

Introduction

The evidence presented in the previous sections informed the identification of potential cycling infrastructure improvements and key cycle routes.

Technical guidance on the identification of cycling routes is published by the DfT. Figure 3-1 shows an overview of the process, as shown in the LCWIP Guidance. Route selection was an iterative process, which built on an evidence base of current and future trip generators, cycling travel patterns and the existing and planned active travel network.

This section presents the identification of the initial routes and the outcome of the stakeholder engagement that contributed to considering and accommodating local daily travel needs, as well as defining the final network.

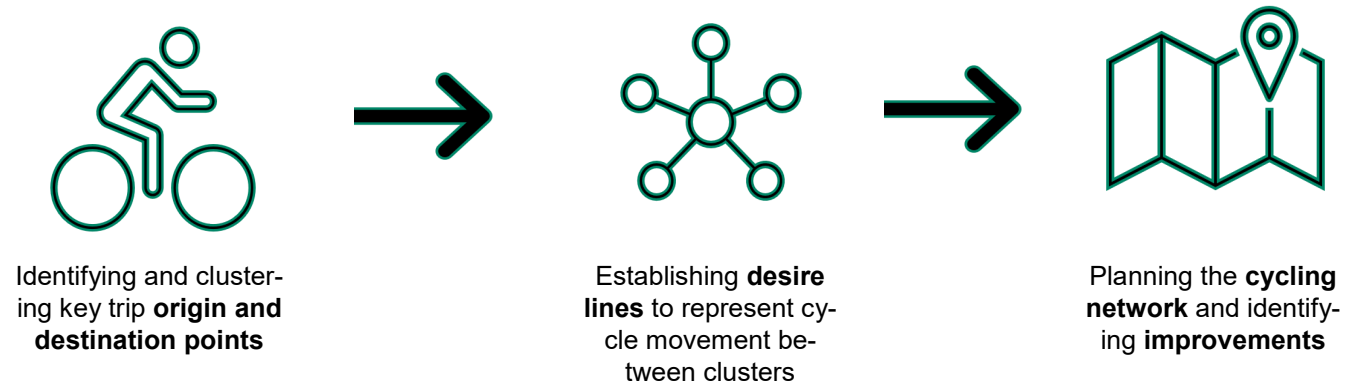


Figure 3-1: Summary of Cycling Network Generation Stages

Key Origins and Destinations

To identify the potential demand across the proposed cycling network, key origin and destination points across Swale were mapped. This was based on the data that was collected during the Information Gathering stage (Stage 2), specifically utilising the location of key trip generators and population and employment densities. Some examples of significant trip generators can be found in Table 3-1.

Concentrations of origin and destination points in locations of high population and employment density were grouped as clusters. Key settlements outside the Swale border were also considered in the analysis to recognise the significance of cross-border trips.

It is important to highlight that trip origins and destinations that were not considered large enough to generate or attract significant cycling flows were not included in the origin and destination clusters. Trip origins and destinations which were excluded were those which were isolated and comparatively small in terms of their population and employment density.

For the purpose of this report origin clusters are defined as areas where the majority of trips would originate, while destination clusters are those areas where the majority of trips would terminate. Where there was a combina-

Table 3-1: Key Examples of Significant Trip Generators

Trip Generators	
Rail Stations	Education Facilities (Nursery, Primary, Secondary, College, University)
Bus Stops	Healthcare Sites (Hospital, Medical Care Accommodation)
Population Centre	Cultural Facility (Museum, Library)
Residential Development Site	Sports or Exercise Facility
Employment Development Site	Religious Building
Mixed-Use Development Site	Retail Site
Tourist Attraction	

tion of origin and destination purpose, the cluster was categorised according to the highest proportion of either origin or destination points within the cluster.

It was taken into consideration that points such as train stations could be considered as both an origin and a destination, however, for the purposes of this analysis they were categorised as destinations.

Figure 3-2 below illustrates the identified origin and destination clusters within Swale and the cross-border clusters outside Swale which were identified as part of the KCWIP.

A list of the identified origin and destination clusters can be seen in Appendix A.

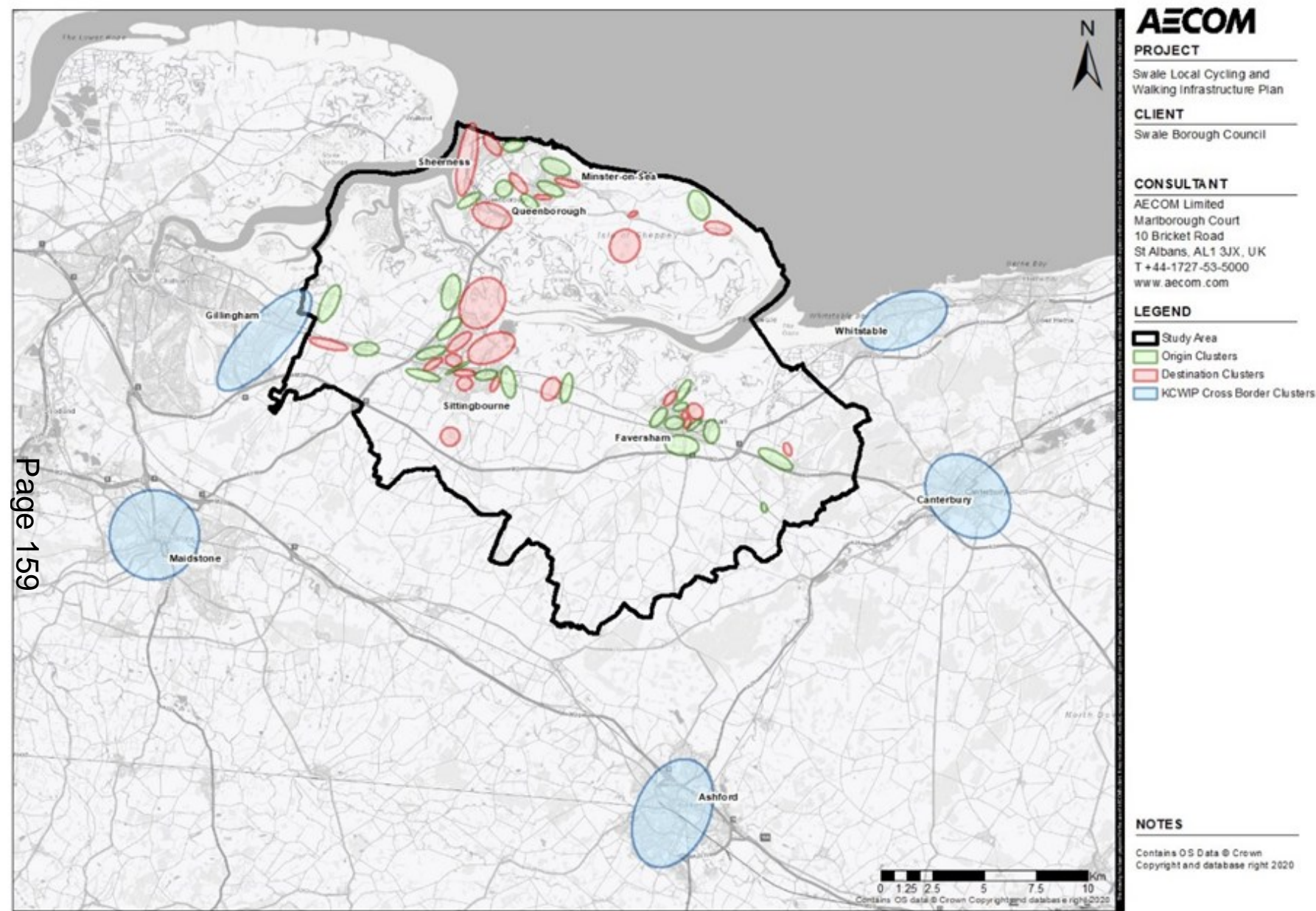


Figure 3-2: Trip Origin and Destination Clusters

Desire Lines

Desire lines in this context are indicative links between origin and destination clusters that reflect the level of demand to travel between two locations. The indicated desire lines do not link to existing infrastructure, nor do they reflect the proposed routes. The process of identifying and classifying desire lines, following the clustering of key origin and destination points, is described in this section.

Identification

The identification of desire lines was an iterative process using the Propensity to Cycle Tool (PCT), analysis of origin and destination points, existing LCWIP routes and information collected in Stage 2 of the LCWIP.

Additional cross-border desire lines which were identified as significant to the borough-wide network as part of the analysis were also included in the desire line identification. This is because there are a number of significant settlements which either represent significant current demand or potential future demand.

It was considered important to include these cross-border desire lines in this analysis to firstly uncover potential suppressed demand as a consequence of poor cross-border connectivity and secondly to ensure there is a balance of longer and shorter routes. The longer routes would be able to connect smaller, rural towns which alone are not significant trip at-

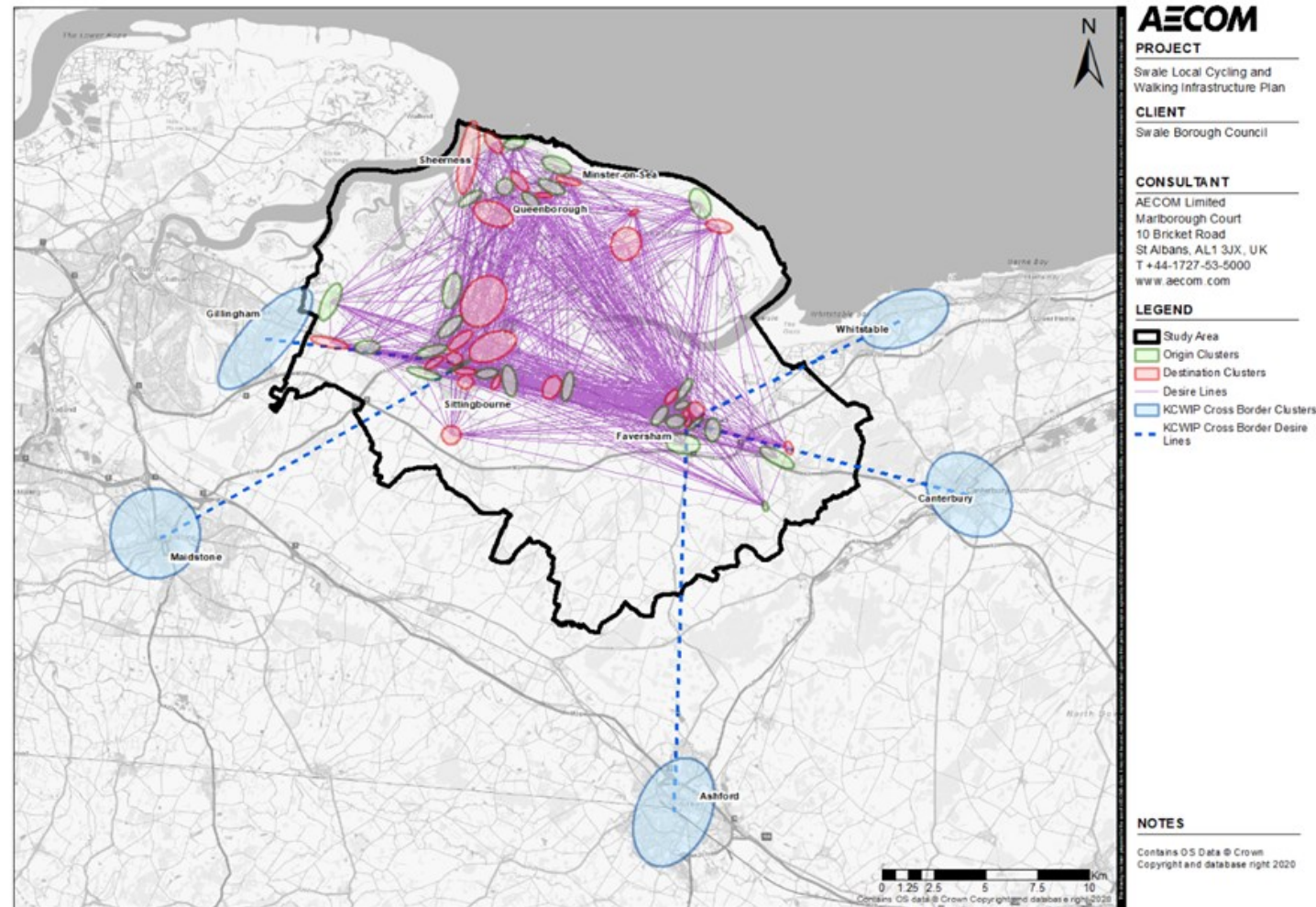


Figure 3-3: Identified Desire Lines

tractors to the settlements which the desire lines connect.

The identified desire lines can be seen in Figure 3-3.

Classification

The relative importance of each desire line to the wider network needs to be understood in order to assess the number of cyclists they will serve in the future if taken forward. As per the DfT guidance, desire lines were classified as ‘primary’, ‘secondary’ and ‘local’, based on the following characteristics:

- **Primary:** High flows of cyclists are forecast along desire lines that link large residential areas to trip attractors such as a town or city centre.
- **Secondary:** Medium flows of cyclists are forecast along desire lines that link to trip attractors such as schools, colleges, and employment sites.
- **Local:** Lower flows of cyclists are forecast along desire lines that cater for local cycle trips, often providing links to primary or secondary desire lines.

As can be seen from the above desire line classifications from the DfT LCWIP guidance, the process of classifying desire lines is deeply rooted in demand. Whilst demand is an important facet of desire lines, the geographic scope and objectives of this LCWIP required the consideration of other factors to ensure an even balance between urban and rural areas as well as focusing on connecting smaller towns into larger settlements.

Initially, 650 desire lines were identified. How-

Table 3-2: Desire Lines for Consideration

Swale LCWIP			KCWIP	SBC Recommendations
Primary	Secondary	Local		
31	84	221	5	9
Total Desire Lines				350

ever, it was not feasible to classify all of these lines, so those greater than 10 km and less than 1.5 km were excluded. Desire lines over 10 km were excluded because the focus of this LCWIP is primarily on connecting rural towns to larger settlements and improving overall connectivity within rural Swale. These longer desire lines typically represented inter-urban routes.

Desire lines shorter than 1.5 km were excluded due to the extensive coverage of planned and proposed active travel schemes in urban areas, where these shorter lines were generally located. As expected, these shorter, urban desire lines scored high in the classification due to high PCT demand, population density, and employment density. Therefore, excluding them was important to ensure a balance of urban and rural routes and to create an LCWIP approach based on more than just demand.

In addition to the desire lines identified in this analysis, the KCWIP cross-border desire lines were also considered along with suggestions from Swale Borough Council (SBC).

Table 3-2 shows the number of desire lines which were taken forward for classification.

Classification example

Table 3-4 provides examples of two desire lines classified as primary and local: the Selling to Central Faversham Business Area desire line and the Kemsley Developments to Sheerness Industrial Areas desire line.

Each desire line was evaluated against specific criteria, receiving a score between 0 and 3 for each criterion. For instance, the following method was used to assign the overall score to the Selling to Central Faversham Business Area desire line (classified as local), as detailed in Table 3-4.

For the anticipated flows criterion, the highest PCT value along this desire line was greater than 22, scoring it ‘High’. The mean PCT flow along this desire line was less than 7, scoring it ‘Low’. Both the highest and mean PCT scores were used to ensure that desire lines passing through urban areas did not exclusively score higher than more rural desire lines.

Additionally, a network gap criterion was included to assess whether this desire line fills a network gap, which is crucial for ensuring an urban/rural balance and a cohesive proposed cycling network. This desire line scored 3 for filling a network gap. The PCT and network gap scores were averaged to provide an overall flow score.

Next, the origin cluster was assessed based on its population density and whether there is a planned or committed development. The origin cluster of this desire line had a population density of less than 2,084, scoring 'Low'. It did not have a planned or committed development, so it also scored 'Low' on this criterion. An overall origin cluster score of 1 was assigned to this desire line's origin cluster.

The same approach was used to assign a destination cluster score of 2 to this desire line by assessing the destination cluster against employment density and the presence of a site allocation.

Based on these scores for demand, origin, and destination clusters, an overall classification score of 2.3 was assigned to this desire line, making it a Local desire line as it scored in the lowest third of overall scores.

Table 3-3: Desire Line Classification Criteria

Criteria	Description	Score
1	Anticipated Flows	PCT Value (Go-Dutch scenario) - Highest Value Min.100m:
		High: Flows >22
		Medium: Flows 7-22
		Low: Flows <7
2	Anticipated Flows	No Flows
		Low: 1
		Network Gaps: Desire line passes within 300m of the NCN:
		High: <17% within 300m of the NCN
3	Origin Size	Medium: 17% - 34% within 300m of the NCN
		Low: 34% - 50% within 300m of the NCN
		None: >50% within 300m of the NCN
		Overall demand score assigned using matrix
4	Origin Size	Population Density: People Per KM (PPKM)
		High: >8020
		Medium: 3534 - 8020
		Low: <3534
5	Destination Size	Classifications based on Natural Jenks
		High: >66%
		Medium: 33% - 66%
		Low: <33%
6	Destination Size	Site Allocation: the size of committed residential developments (sqm) relative to one another.
		High: >66%
		Medium: 33% - 66%
		Low: <33%
7	Destination Size	Employment Density: People Per KM (PPKM)
		High: >33
		Medium: 11 - 33
		Low: <33
8	Destination Size	Classifications based on Natural Jenks
		High: >66%
		Medium: 33% - 66%
		Low: <33%

Table 3-4: Desire Line Classification Examples

Desire Lines			Anticipated Flows (Go-Dutch Scenario)							OD Size												Classification	
			Highest Value		Mode Value		Flow score	Network gap	Overall score	Origin						Destination							
Origin	Dest.	Length (km)	PCT Value	PCT Demand	PCT Value	PCT Demand	Score (0-3)	Score (0-3)	Score (0-3)	People per KM (PpKm)	Size (PpKm)	Site allocation (size)	Score of allocation	Origin size	Origin score	Employees per Ha (EpH)	Size (EpH)	Site allocation (size)	Score of allocation	Dest. score	OD overall score	Overall Score	Classification
Complex Developments	Selling Central Faversham Business Areas	5.89	>22	High	<7	Low	2.0	3.0	2.5	<2,084	Low	-	Small	Small	1	1,167 - 3,460	Med.	-	Small	2	2	2.3	Local
	Sheerness Industrial Areas	8.24	>22	High	<7	Low	2.0	2.0	2.0	<2,084	Low	726,615	Large	Large	3	<1,167	Low	1,652,667	Large	3	9	5.5	Primary

As shown in Figure 3-4, the outputs of the desire line classification process include clear primary desire lines between Sittingbourne and Faversham and connecting to the Isle of Sheppey.

There are also several Primary desire lines connecting the towns on Sheppey, as well as rural towns outside of Sittingbourne. The local desire lines, in turn, represent longer routes that connect to the primary desire lines.

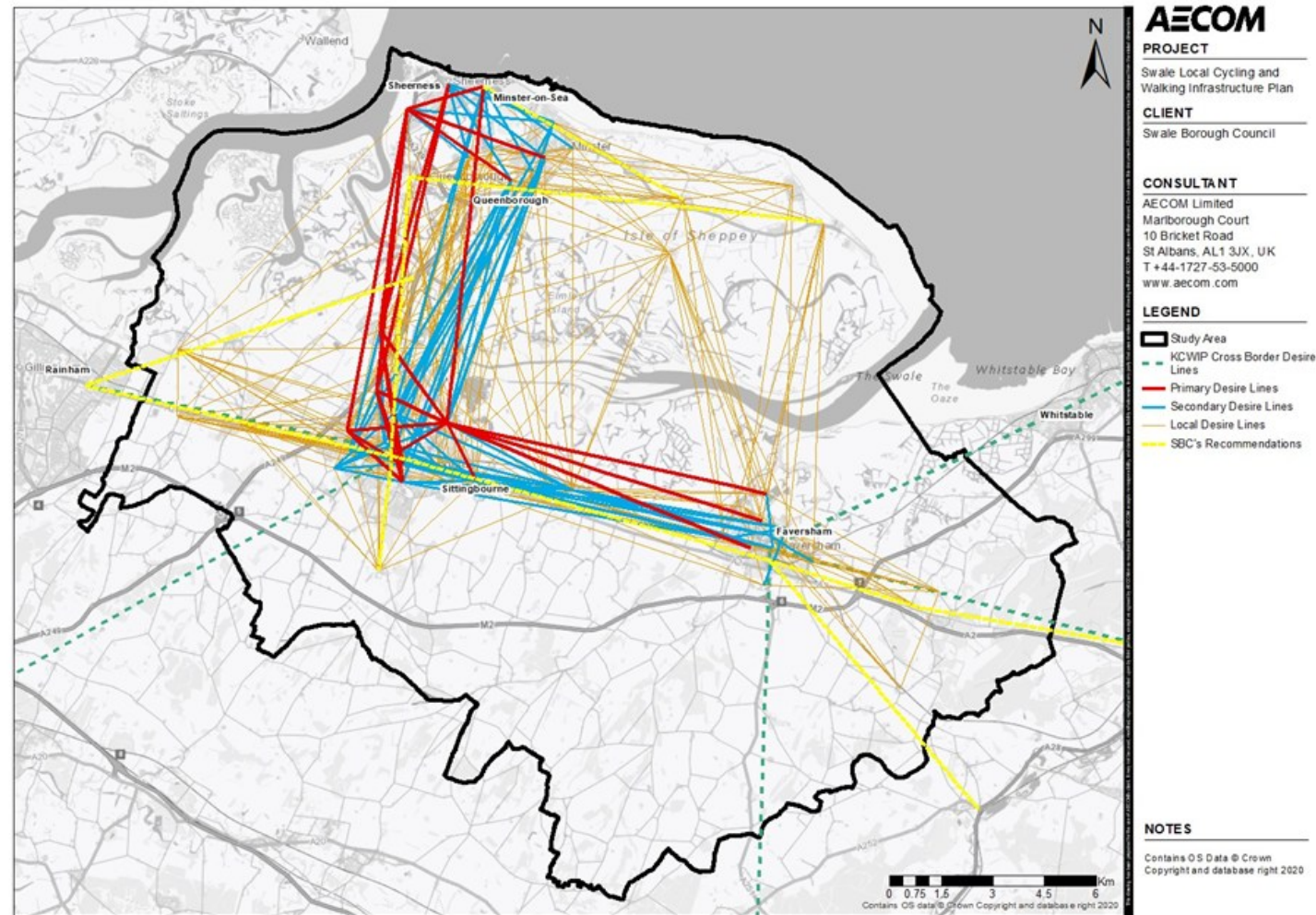


Figure 3-4: Classified Desire Lines

Figure 3-5 demonstrates the desire lines taken forward for route selection. As shown, cross-border KCWIP desire lines were included, along with the highest scoring desire lines.

Secondly, overlapping desire lines or those with similar origins and destinations were merged to ensure comprehensive coverage across Swale.

Thirdly, the next highest scoring desire lines were identified, such as those connecting the Sheppey Towns and Bapchild. No desire lines in Faversham were taken forward due to an existing LCWIP already covering the town. Additionally, no desire lines were taken forward on the Isle of Sheppey because the Sheppey Towns LCWIP was being produced alongside the Swale LCWIP. This meant that at this stage, the focus of this LCWIP was on Sittingbourne. Chapter 5 of this report provides more information on how the Swale LCWIP and Sheppey Towns LCWIP were merged after the route networks were identified and before public consultation. Therefore, the focus of the proposed cycling network was on Sittingbourne and the east-west and north-south movements connecting the town. This is because of the large number of primary desire lines in this area, representing significant current and future cycling demand, as well as a notable gap in planned/proposed schemes.

The desire lines taken forward for route

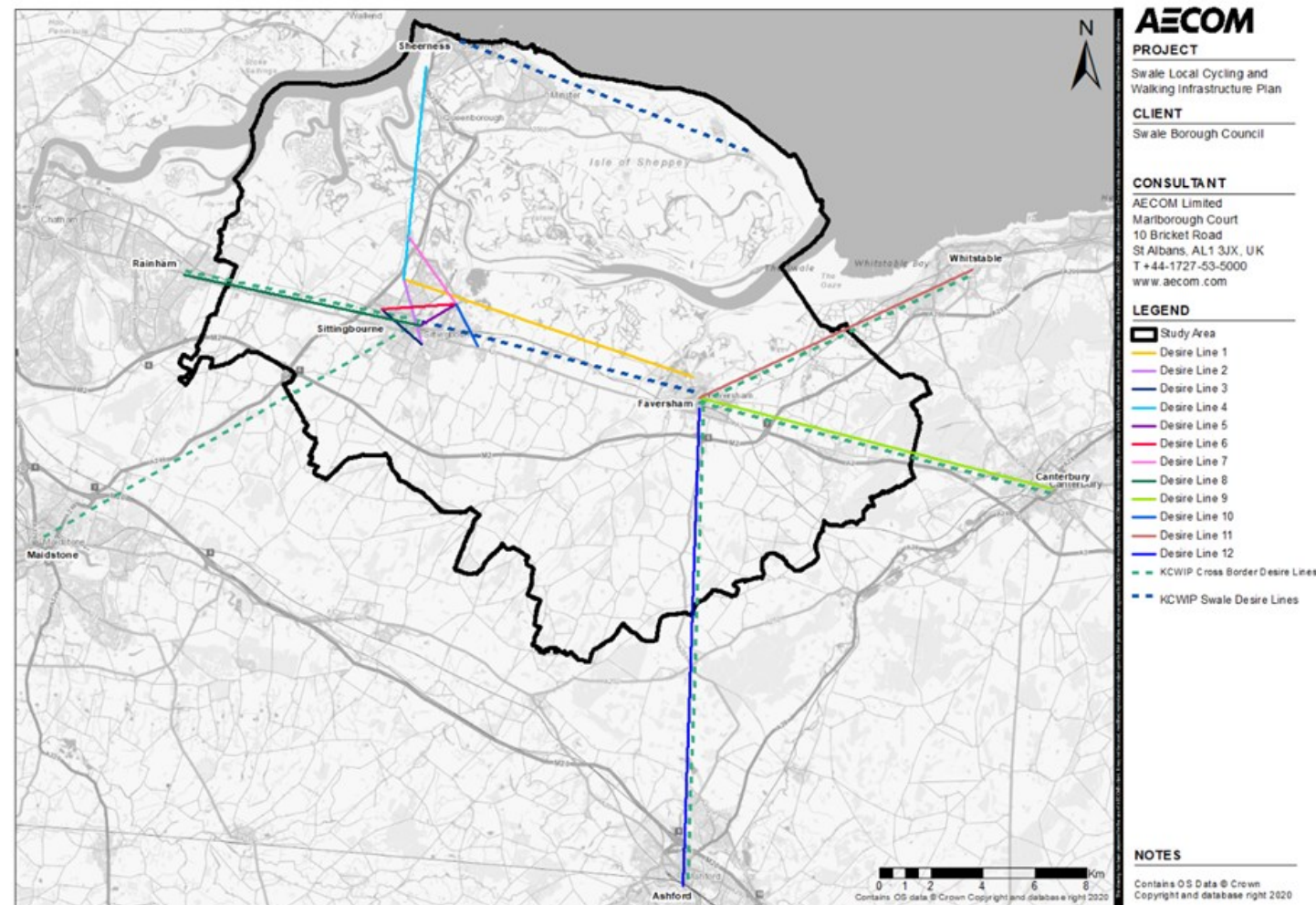


Figure 3-5: Desire Lines for Route Selection

selection represent current priorities for SBC. Other desire lines are not discarded for future analysis but have not been identified as primary at this stage. This prioritisation is subject to further updates based on changes

Identified Network

The identified network is shown in Figure 3-6 and the alignment of each route is described below.

CR1- Kemsley to Faversham: This route provides an east-west corridor connecting Faversham and Sittingbourne from Kemsley rail station. It follows the proposed KCWIP alignment after going through Murston, running parallel to the A2 and south of the NCN before heading towards Faversham through Four Oaks where it connects into a route proposed in the Faversham LCWIP.

CR2 – Kemsley to South Sittingbourne: This route connects Kemsley station to south Sittingbourne. It follows the B2005 which is part of the NCN from just south of the B2005/Sandstone Drive/Grovehurst Avenue roundabout. The route then crosses the A2 connecting to Memorial Hospital in Sittingbourne and Sittingbourne Recreation Ground and finishes by Fulston Manor school, which has approximately 1,300 pupils.

CR3 – Grove Park to Eurolink Business Park: This route connects the Grove Park/ Grove Park Primary School with south Sittingbourne, up to the A2. The priority route crosses the A2, connecting Westlands Primary School, Fulston Manor School and the Sittingbourne school. This provides a crucial east-west connection across south Sittingbourne. The alternative route routes north through Mil-

ton Regis Recreation Ground and Sittingbourne Station before crossing the A2 and rejoining the priority route at the junction of Swanstree Avenue and Highstead Road. This route provides a vital connection between the station and large schools to the south of Sittingbourne.

CR4 – Sittingbourne to Sheerness: Routes north along Senora Way in Sittingbourne to Quinton Road via Iwade and Swale Station along the NCN. The route connects to the A2500, providing a valuable north-south connection from the Isle of Sheppey to Sittingborough.

CR5 - Sittingbourne to Eurolink Business Park: This route connects Sittingbourne Station to Eurolink Business Park through Milton Creek Country Park. It routes north along the B2006 via the NCN before heading along Gas Road before turning right into Milton Creek Country Park, utilising PRoWs to route towards Swale Way. This provides an off-road routing option through Sittingbourne.

CR6 - Grove Park to Eurolink Business Park: This route connects Grove Park and Eurolink Business Park. The priority connects Sittingbourne station as well as a number of planned developments in the town centre. The priority route then routes along the A2 and provides a crucial connection under the railway to connect to Eurolink Way. The route then follows Castle Road (using the NCN) before connecting to the rounda-

bout with Swale Way. The alternative route connects through Milton Regis/ Milton Regis Primary School. It then goes through Milton Creek Country Park before utilising PRoWs to connect to Swale Way.

CR7 – Iwade to Bapchild: This route connects Iwade to Bapchild via Sheppey Way before heading east on a cycle path on Bramblefield Lane. It then routes along the B2005, utilising the existing cycle lane up to the roundabout with Castle Road. The route then utilises Church Road, following the NCN to Murston Road before turning onto the A2, past the planned housing development and into Bapchild.

CR8 – Sittingbourne to Rainham: This route provides a crucial cross-border connection between Sittingbourne and Rainham. The route travels north from Sittingbourne rail station through Milton Regis and joins the NCN on Stickfast Lane. and then north, at which point it joins the NCN into Rainham rail station. The alternative route travels along the A2 for its entirety between Sittingbourne and Rainham.

CR9 – Faversham to Canterbury: This route provides a cross-border connection between Faversham and Canterbury. The priority route goes through Faversham Recreation Ground, following PRoWs to Chalkey Road. It then routes via a short cycle lane parallel to the A2 then leaves the A2 via Boughton-under-Blean and Dunkirk. This road has a 30mph speed limit for its entirety before joining the A2 again.

At this point there is a shared pavement for pedestrians and cyclists. It then crosses the A2050, following Church Hill and into Canterbury East Station. This route crosses the A2050, at which point it follows the proposed KCWIP routes into Canterbury East Station. The alternative route is a more rural alignment, going through Selling Station and to Chartham Station. This route follows NCN Route 18, until it connects to the priority route at Toddler's Cove.

CR10 – Ashford to Faversham: This route connects Ashford to Faversham via Potter's Corner, Throwley Forstal and Potter's Corner before connecting into Faversham Station.

CR11 – Faversham to Whitstable: This route connects Faversham to Whitstable. It begins at Faversham Station, going via Faversham Recreation Ground, connecting to NCN Route 1, routing through the proposed Solar Farm before joining the NCN Route 1 again along the coast.

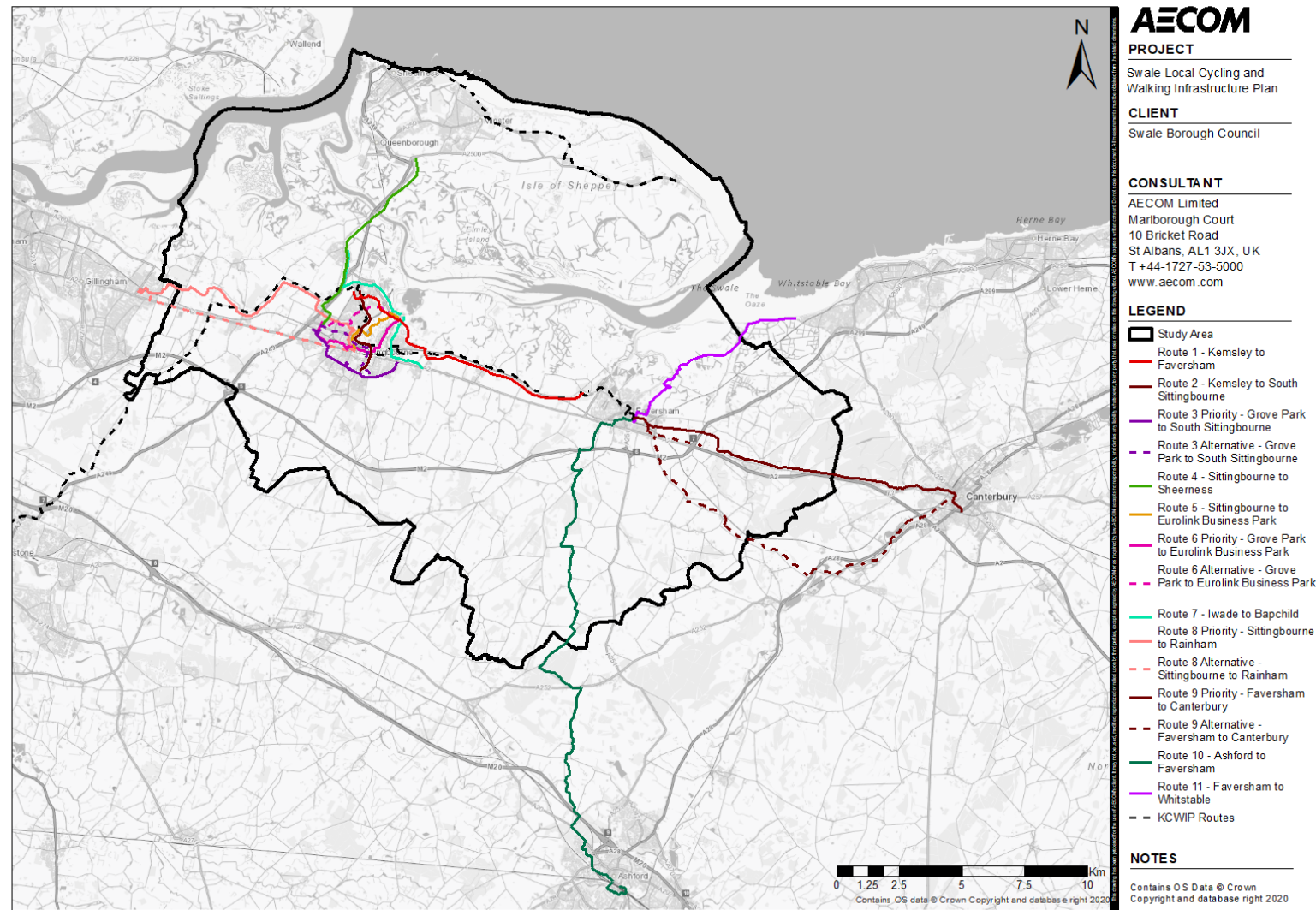


Figure 3-6 Identified Cycling Network

Stakeholder Engagement

The identified cycling network, shown in Figure 3-7, was presented to local stakeholders. The meeting provided a platform to gather their opinions on the proposed network.

Overall, the stakeholders welcomed the identified cycling routes and used their local knowledge to make suggestions, such as altering the alignment of proposed routes to make them more attractive to local residents and ensure longer-term support. The key outcome of this meeting was to ensure the routes are direct, where possible avoiding car-dominated or fast roads. The comments received from stakeholders are summarised in Table 3-5.

Figure 3-7 illustrates the updated proposed cycling network, incorporating feedback from the stakeholder engagement workshop. Following the decision to merge the Swale LCWIP and Sheppey Towns LCWIP (see Chapter 5), only the 'primary' routes will be taken forward to public consultation to manage the routes we are seeking feedback on.

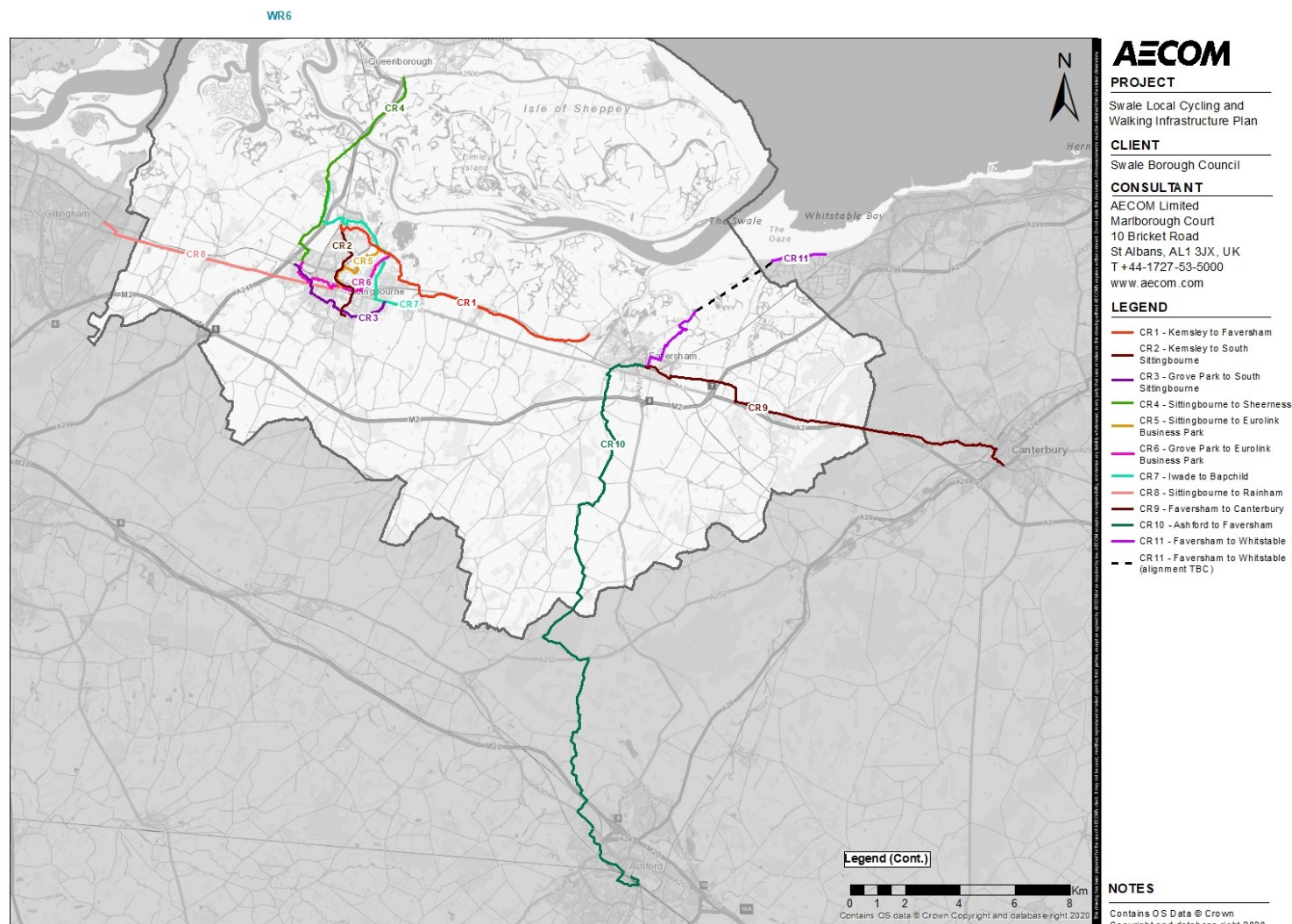


Figure 3-7 Proposed Cycling Network Following Stakeholder Engagement

Table 3-5: Summary of Stakeholder Feedback

Cycling Route	Stakeholder Comment
	Lower Road is very fast- a safer alternative would be suggested.
CR1	Speed limits could be amended on this route.
	Currently, people who go to work between these areas use the pavement on the A2.
CR2	Using Bell Rd is very steep - potential to include stop boxes at traffic lights to make cycling easier.
	Agreement with the primary connections to other routes.
	The crossing with Bell Rd doesn't recognise cyclists.
CR3	Through the housing estate would need updated lighting.
	There's still challenges around crossing the A2 and Park Rd can be quite wide. Suggestion to use Sydney Avenue to avoid the currently proposed junction on the A2 which is busy and hard to navigate.
	Sections of this route are dangerous – especially from Iwade to Swale Station.
	There's width restrictions along sections of this route which could be useful to increase cycling.
CR4	Need better access into Swale Station.
	Cowstead Corner needs to have cyclist priority as it's very dangerous with lorries and congestion. Generally, the roundabouts along this route are a challenge with speeds and traffic flows.
CR5	Agreed with the focus on improving the Creek park. Access to the station could be a challenge to tackle severance.
CR6	Challenge around segregating cyclists and industrial traffic.
	Challenge along the A2 because segregated cycle lanes would be needed. It's possible to use the shared path around the development instead of the A2.
CR7	Using Snipeshill is wide and there's speed cameras which could be valuable.
	Need enough width for people with adapted cycles - shared use paths aren't the ideal standard as it could put peds off
CR8	A difficult route to tackle - preference is direct route but this isn't an ideal option.
	The alternative route has a lot of potholes between Faversham and Boughton Leeds.
CR9	The priority route is preferred here.
	Potential to consider northern access into Canterbury
	Alternative routeing suggested which goes via Oversland and Lower Endsden
CR10	Northern section of the route works, but Painters Forstall section of the route can be fast, downhill and with sharp turns. Potential to use Western Road south of Painters Forstal and approach Throwley from the west.
	Alternative suggested between Faversham and Throwley via Whitehill
CR11	Adjust the route to go via Solar Cycleway.

Establishing Infrastructure Improvements

Proposed interventions were identified through a comprehensive desktop analysis, that also considered other schemes currently at the planning stage.

A total of 204 cycling interventions were identified, which included:

- Improving route continuity, overcoming barriers and severance
- Installation of new and improved crossings for cyclists
- Provision of segregated cycle lanes (or introduction of segregation to existing facilities)
- Introduction of speed limit reductions, traffic calming and other measures to reduce motor traffic speed and dominance and promote a more comfortable cycling environment, and
- The installation of improve wayfinding signage and enhanced street lighting.

Figure 3-8 shows the location of all the interventions required to deliver a safe cycling network, while **Appendix B - Appendix D** provides more detail on location and description of interventions for each route.

It is important to note that these are high-level interventions and further study and a greater level of investigation and assessment is re-

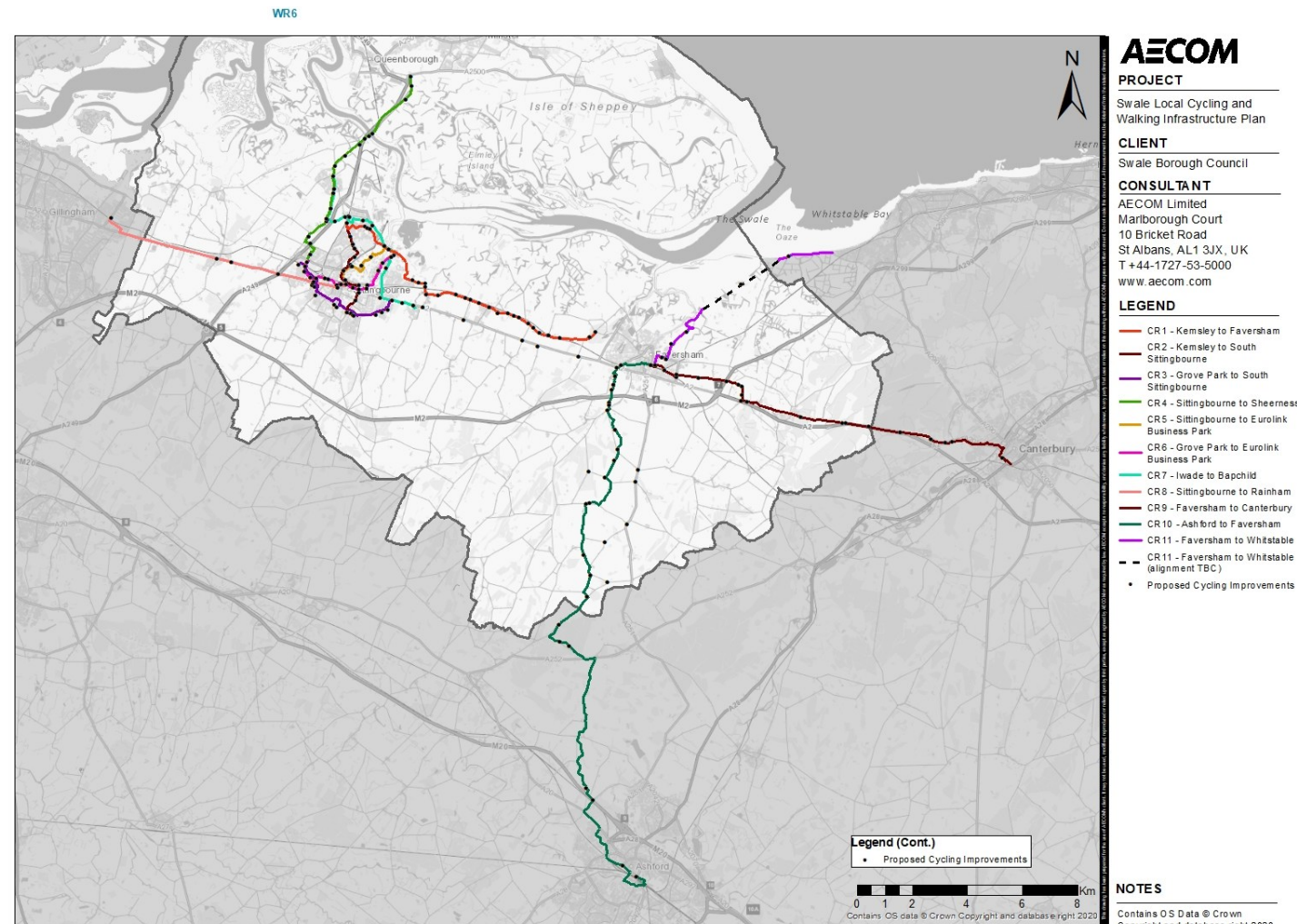


Figure 3-8 Identified Cycling Infrastructure Improvements

quired prior to design, consultation and implementation. The deliverability in terms of constraints, risks and costs for multiple options are all important considerations alongside the relative benefits and detriments.

Incorporating the Sheppey Towns LCWIP

Two LCWIPs were undertaken simultaneously across Swale in 2023 and 2024. One was the Swale borough-wide LCWIP (detailed in this report), while the other focused on the Isle of Sheppey. The Swale LCWIP identified distinct walking, wheeling, and cycling routes and improvements, whereas the Sheppey Towns LCWIP proposed combined active travel routes for walking and cycling.

Prior to public consultation, the Sheppey Towns LCWIP was merged into the Swale LCWIP to streamline the documents and present a coherent active travel network across the borough. As a result, the cycling network and interventions being consulted on by the public now reflect this combined approach.

The active travel routes identified as part of the Sheppey Towns LCWIP can be seen in **Appendix C and Appendix F**.

04

Stage 4: Network Planning for Walking

Stage 4: Network Planning for Walking

Introduction

This section outlines the steps followed to map the future walking network, as defined by the DfT Local Cycling and Walking Infrastructure Plans guidance, and shown in Figure 4-1. This iterative process incorporated current and future trip generators, walking patterns, the existing and planned active travel network, and feedback from key stakeholders.

This section details the identification of the initial routes for further development, aiming to encourage short trips to be made on foot rather than by car. Stakeholder engagement helped address local daily travel needs and define the final network. High-level interventions along the final walking routes are presented at the end of this section.

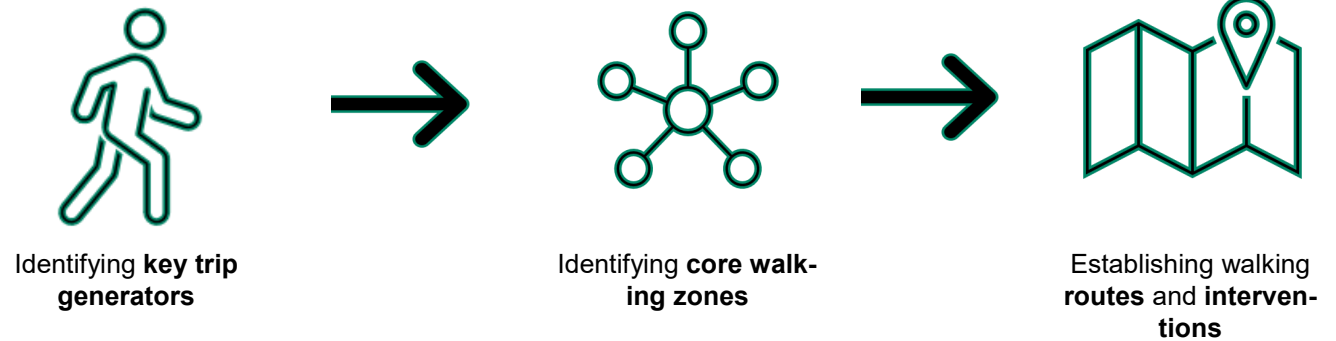


Figure 4-1: Summary of Walking Network Generation Stages

Key Trip Generators

Developing the walking network involved mapping the key walking trip generators to allow the identification of origin and destination points. This stage focuses on the key sites which generate significant pedestrian demand among the high number of destinations across Swale. The key trip generators can be seen in Figure 4-2. These included:

- Education sites with over 500 pupils
- Town centres
- Healthcare sites
- Retail sites
- Employment sites
- Community/ Leisure sites
- Key transport interchanges
- Planned/ committed developments

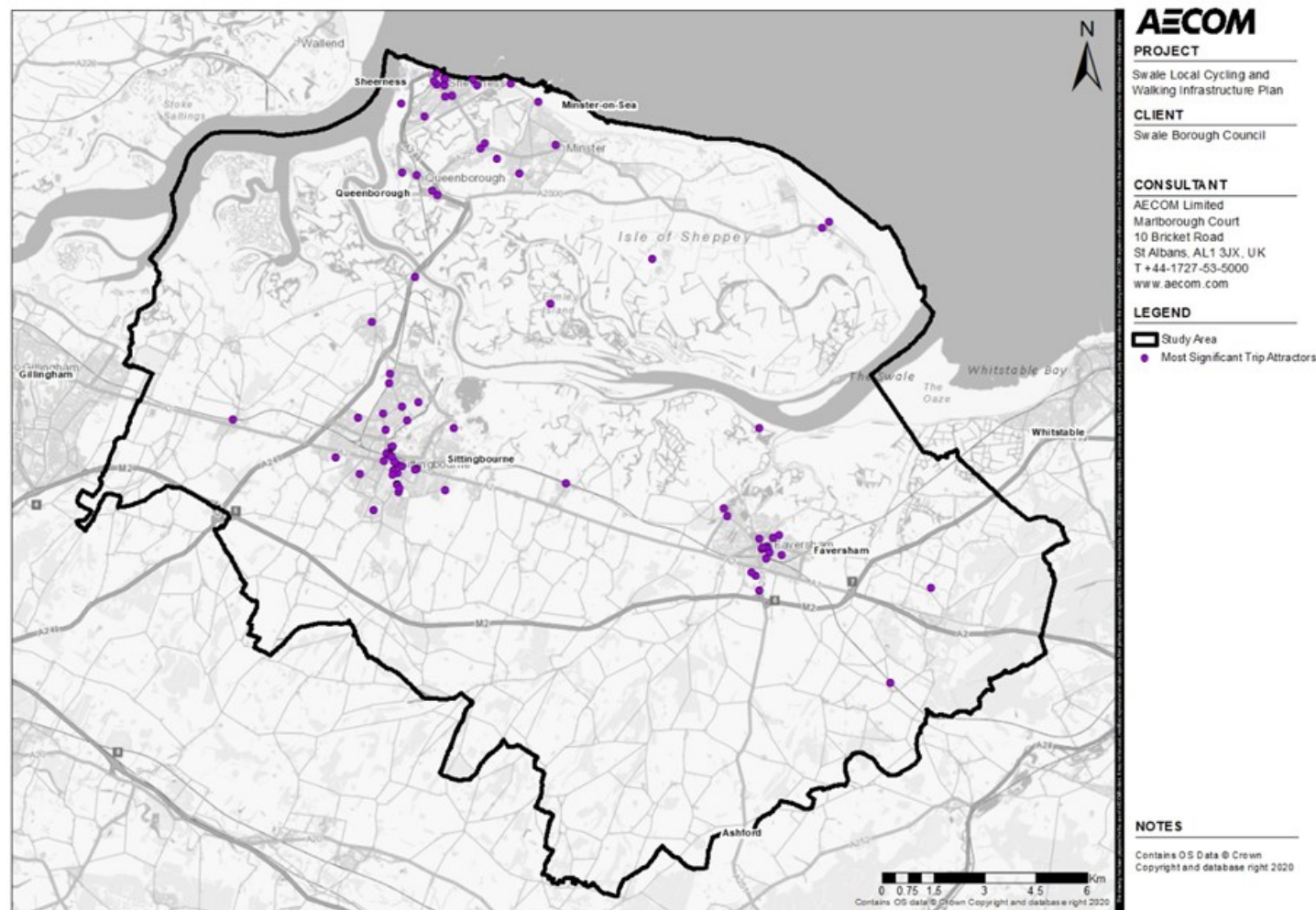


Figure 4-2 Significant Trip Attractors Across Swale

Walking Zones

After identifying and mapping the key trip generators, walking isochrones representing an approximate 15-minute walk were drawn around each destination. The number of overlapping isochrones was then analysed to determine the areas with the highest density of key destinations. Core walking zones (CWZ) (400m buffers) and walking zones (2km buffers) were established around areas with multiple overlapping key destinations. The outcome of this analysis is shown in Figure 4-3.

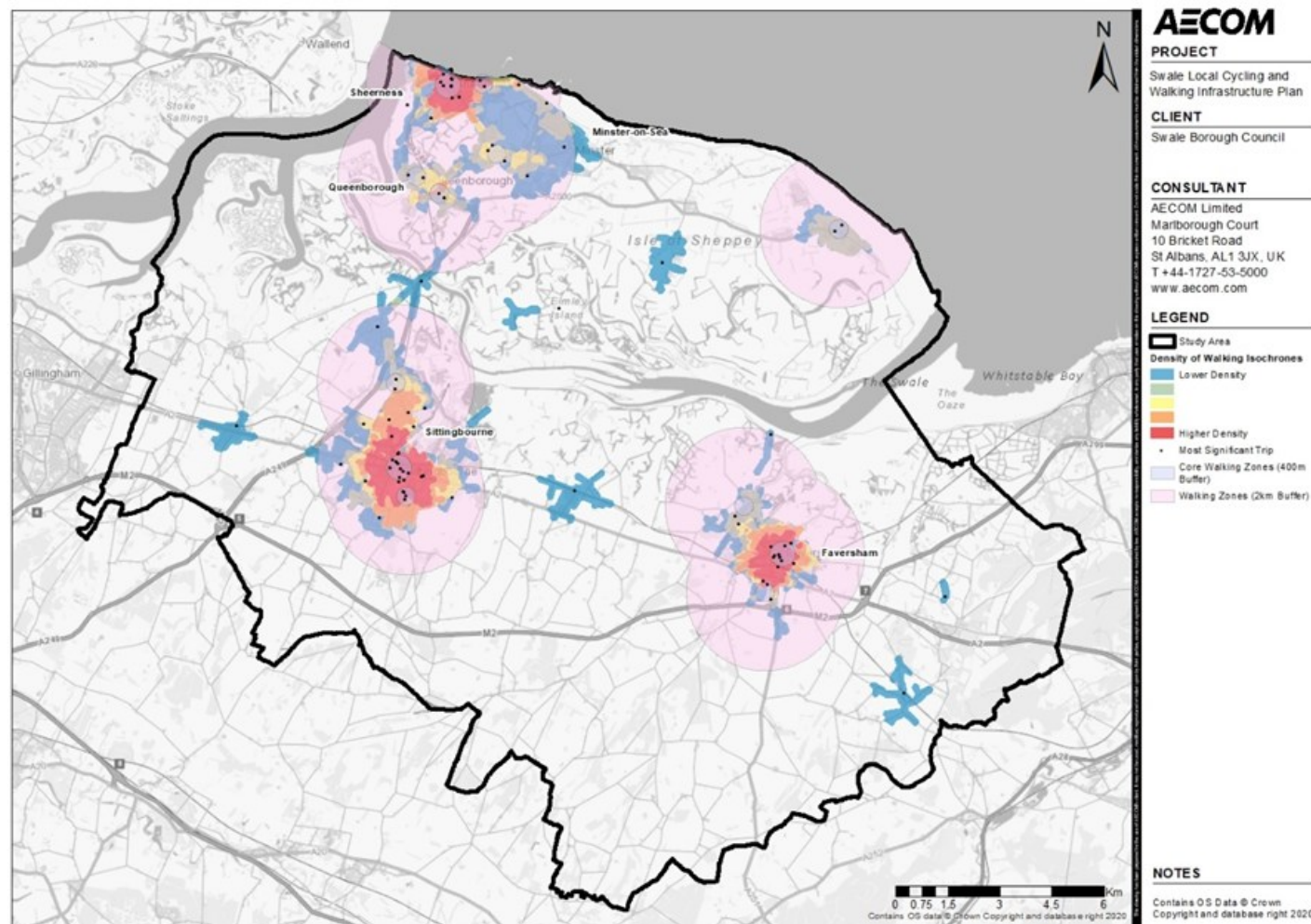


Figure 4-3 Density of Key Trip Attractors in Walking Distance (Isochrones) in Swale

As Figure 4-4 illustrates, walking zones were identified in Faversham, Sittingbourne, and on the Isle of Sheppey. The walking zones in Sittingbourne and Leysdown were taken forward to the route selection process because there is an existing LCWIP in Faversham, and there are several planned or ongoing active travel schemes aimed at connecting the Sheppey Towns and improving active travel infrastructure in this study area. This Swale LCWIP will complement the already proposed schemes in Faversham and the Sheppey Towns.

Route Selection

Converting the CWZs into routes for inclusion in LCWIPs is an iterative process and, along with the route selection for cycling routes, is one of the most important elements of the LCWIP process. The key aim was to identify walking routes that meet core design outcomes to create a coherent, direct, safe, comfortable, and attractive walking network. These routes should link to the existing walking network and connect the key destinations identified in the previous stage.

The identified CWZs, along with the existing walking infrastructure serving them within the 2km buffer zones, were taken into consideration to identify walking routes that would bridge gaps in the existing network and create a continuous and seamless walking network.

The routes were developed from data analysis conducted up to this point, informed by vari-

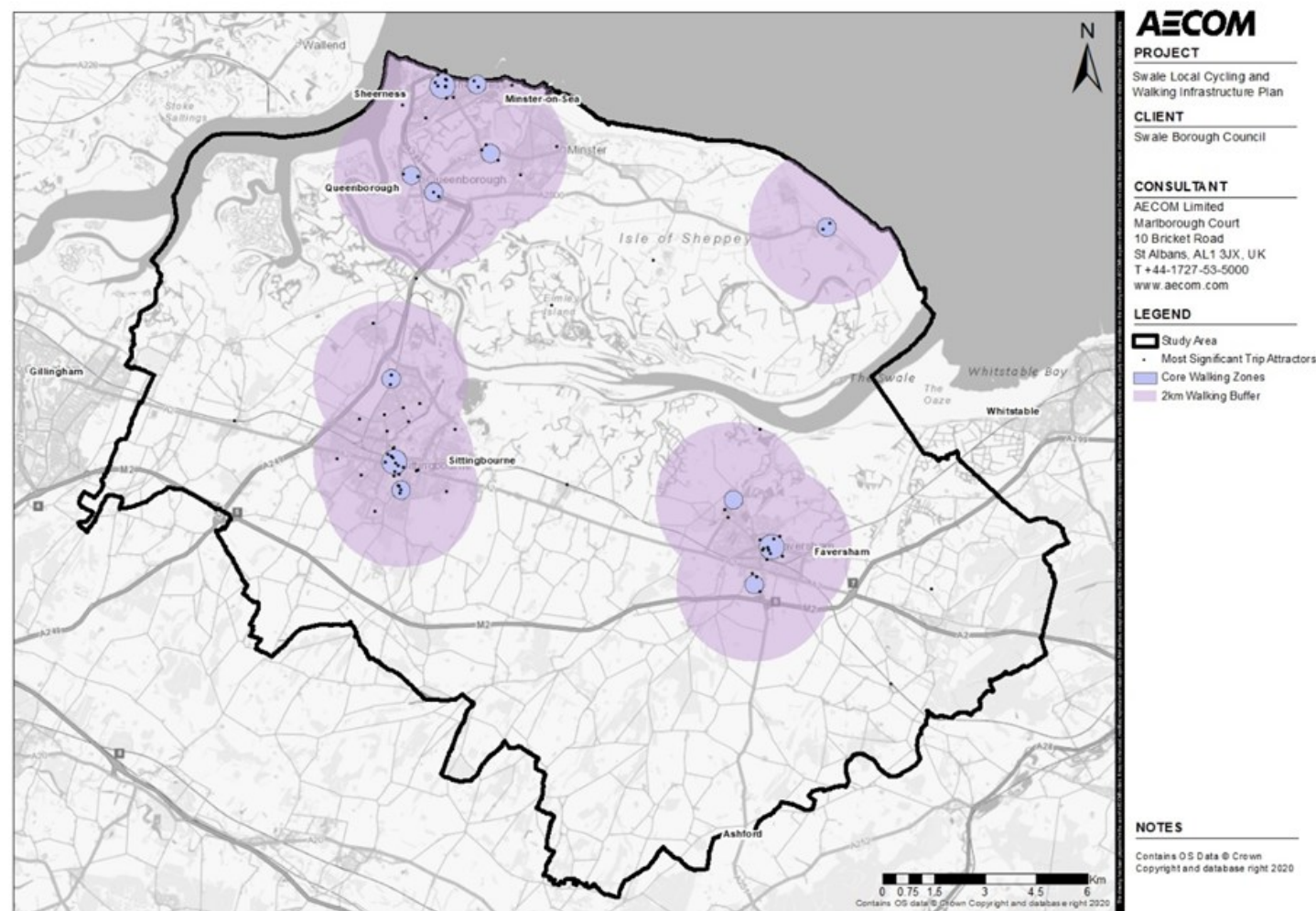


Figure 4-4 Walking Zones Across Swale

ous data sources, such as the existing active travel network and Google Maps data. They also aligned with Kent County Council's Public Rights of Way (PRoW) Improvement Plan [13].

[13] https://www.kent.gov.uk/__data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf

Identified Network

The identified network is shown in Figure 4-5 and the alignment of each route is described below.

WR1 – Shellness to Warden: This route connects Shellness to Warden via Leysdown-on-Sea. It utilises PRowS north from Shellness, largely following the coastal path before connecting into Leysdown-on-Sea where it utilises on-road routes.

WR2 – Sittingbourne Station to SW Sittingbourne Developments: This route connects Sittingbourne station with the significant planned development in south-west Sittingbourne via Westlands Primary school. This route provides a crucial connection across the A2 for pedestrians

WR3 – Sittingbourne Station to East Sittingbourne: This route connects Sittingbourne station to the planned development to the east of Sittingbourne. It routes via the A2 from the station, continuing along Shortlands Road, making use of the PRowS which connect to Peel Drive to provide a lower-traffic alternative to using the A2. An additional arm of this route was added to provide a valuable north-south connection across the A2 and south through Rectory Playing Field.

WR4 – Sittingbourne Station to Eurolink Business Park: This route connects the station with the Eurolink Business Park, which is

a major employment site. This route follows the A2 before going north under railway, then utilising the B2005 at which point it follows connects to Swale Way at the Castle Road roundabout where it connects into a PRow between East Hall Wood and Murston. This route provides a direct route for pedestrian exiting the station and accessing Eurolink Business Park as well as connecting to PRowS north of Sittingbourne, creating an overall more connected network.

WR5 – Central Sittingbourne to East Sittingbourne: This route connects Sittingbourne station with east Sittingbourne. Its core aim is to be direct and coherent to encourage mode shift. It connects the station with Borden Grammar School and South Avenue Primary School runs just north of the Sittingbourne School and Meadowfield School. Crucially, this route connects to Route 3 and Route 6 to contribute to creating a more connected network across Sittingbourne.

WR6 – SW Sittingbourne Developments to East Sittingbourne: This route connects the significant planned development in SW Sittingbourne with east Sittingbourne using a direct east-west alignment. This route connects five schools: Meadowfield School, Westlands Primary School, Highstead Grammar School, Fulston Manor School and The Sittingbourne School. Additionally, this route connects to Route 2, Route 7 and Route 5.

WR7 – South Sittingbourne to Milton Creek Country Park: Connecting south Sittingbourne to Milton Creek Country Park, creating a valuable north-south walking route across Sittingbourne. The route connects Fulston Manor School, Highsted Grammar School and Regis Manor Primary School to Sittingbourne Station, as well as providing an additional pedestrian connection across the A2. The Primary alignment follows Hawthorn Road and the Alternative alignment utilises PRowS to connect Dover Street with Jubilee Street.

WR8 – Kemsley to Eurolink Business Park: This route connects Kemsley Station to Eurolink Business Park via Milton Creek Country Park. This will create a valuable, mostly off-road, direct connection between the station and the significant employment site of Milton Creek Country Park.

WR9 – NW Sittingbourne Development to Sittingbourne Station: This route connects the planned development in NW Sittingbourne to Sittingbourne Station providing a valuable, direction connection between the origin and destination points. It connects Milton Coury Primary Academy/ Children's Centre as well as smaller developments in the centre of Sittingbourne.

WR10 - Kemsley to Iwade: This route connects Kemsley Station through two significant planned developments. It routes over the A249 junction (which will be upgraded in line

with the Swale Improvement Plan [14]), connecting to the south of Iwade via a PRow. Lastly, it routes through Iwade, ending at the PRow on School Lane.

WR11 – Kemsley to Sittingbourne Station: This route connects Kemsley to Sittingbourne Station via Mill Way. It is a crucial north-south, direct connection between Kemsley and central Sittingbourne which also connects to smaller planned developments. This route forms a crucial part of the wider network, removing barriers to walking along this car-dominated stretch of road.

WR12 – North to South Murston: This route provides a walking connection from north Murston to South Murston, which is a significant growth site in Sittingbourne. This route connects to Route 4 to the north and Route 3 to the south.

WR13 - West Sittingbourne to Sittingbourne Station: This route connects west Sittingbourne with Sittingbourne Station via a number of smaller developments in central Sittingbourne and Chalkwell. It provides a valuable crossing across the railway line, connects to Aspire School and the Meads Community Woodland. Whilst this route is not the most direct alignment between the origin and destination points, it passes through a number of populated areas within Sittingbourne, connects to other routes which form the network and its length means that it can be picked up at a number of different points.

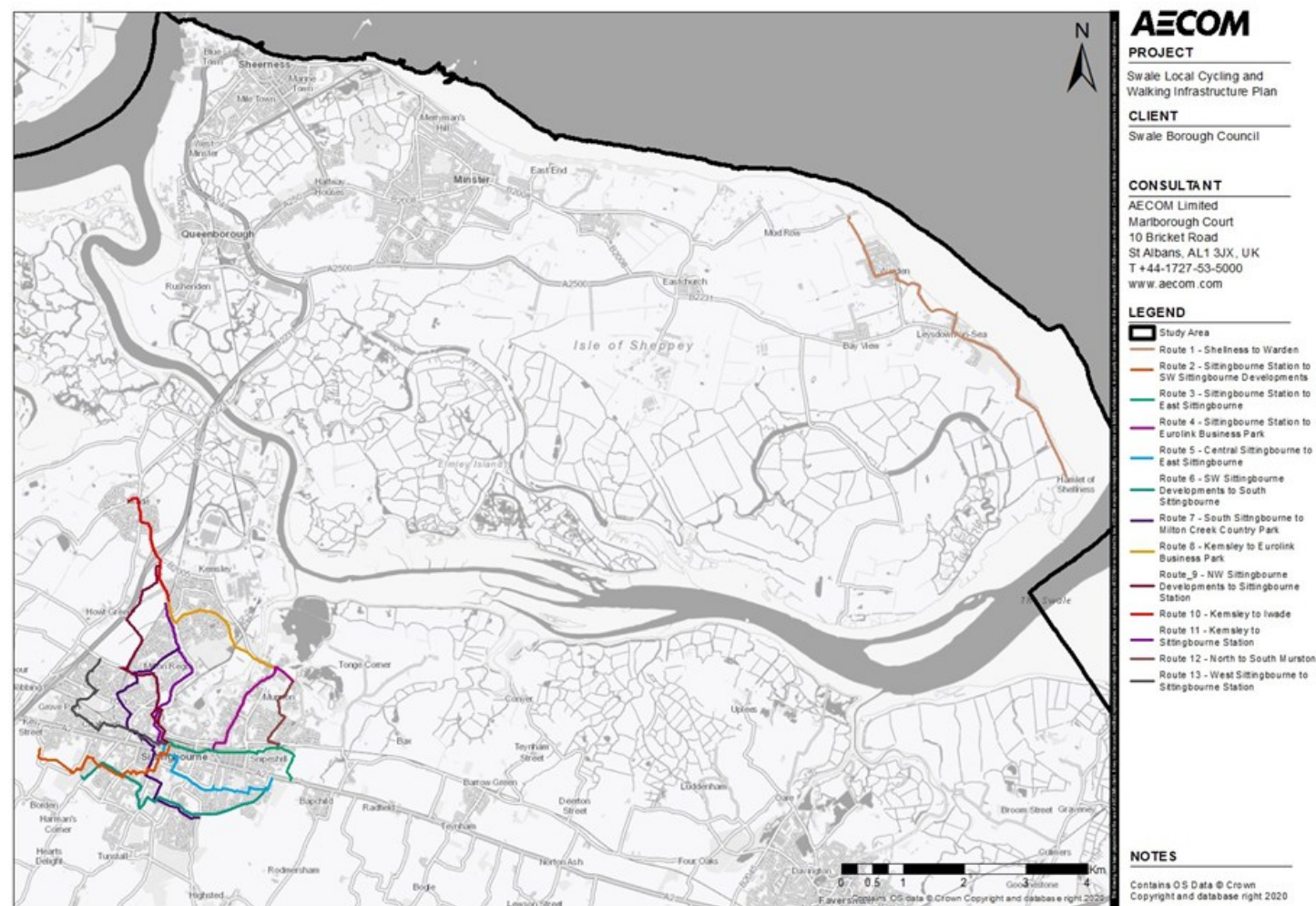


Figure 4-5 Identified Walking Network

WR14 - Iwade to Swale Station: This route connects WR10 in Iwade to the Sheppey Towns LCWIP network at Swale station. It makes use of PRows running adjacent to Sheppey Way, providing a crucial off-road walking connection with the Isle of Sheppey.

[14] https://www.kent.gov.uk/__data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf

Stakeholder Engagement

The identified walking network, shown in Figure 4-5, was presented to local stakeholders. The meeting provided a platform to gather the stakeholders’ opinion on the identified network.

Overall, the stakeholders welcomed the identified walking routes and used their local knowledge to make some suggestions such as altering the alignment of proposed routes or ensuring the proposed improvements contribute to creating safer, more direct walking routes. The comments received from stakeholders are summarised in Table 4-1.

Figure 4-6 illustrates the updated proposed walking network, incorporating feedback from the stakeholder engagement workshop.

Following the decision to merge the Swale LCWIP and Sheppey Towns LCWIP (see Chapter 5), only the ‘primary’ routes will be taken forward to public consultation to manage the number of routes for feedback.

Table 4-1: Summary of Stakeholder Feedback

Walking Route	Stakeholder Comment
WR3	Consideration of lighting and air pollution along this route as lots of children going to school would use this. Add additional arm south across the A2 to facilitate the number of school children using this route.
WR6	This route goes through a more affluent area - ensure the network covers less affluent areas too. Proposed alternative alignment between Homewood Avenue and Capel Road via Connught Road.
WR7	Improvement to underpass needed. Alternative alignment suggested to avoid the underpass – uses Hawthorn Road between the A2 and Chalkwell Road.
WR9	This is primarily a car route - if an alternative route is available, this would be favoured. Proposed a small amendment to the route at St Pauls.
WR10	Proposed alternative route through Iwade which links the new development to Grovehurst roundabout.
WR12	Proposed an additional ending to the route which extends to Gas Road.



Figure 4-6 Proposed Walking Network Following Stakeholder Engagement

Establishing Infrastructure Improvements

Proposed interventions were identified through a comprehensive desktop analysis, that also considered other schemes currently at the planning stage.

A total of 200 walking interventions were identified, which included:

- Improving route continuity and level of provision, including overcoming barriers and severance to pedestrian movement along the identified routes
- Installation of new and improved pedestrian crossings, including upgrading uncontrolled crossings to controlled crossings and introducing pedestrian priority at key locations, and
- Implementation of an appropriate way-finding system.

Figure 4-7 shows the overview of the location of all the interventions required to deliver a safe walking network, while **Appendix E** and **Appendix F** provides more detail on location and description of interventions for each route.

It is important to note that these are high-level interventions and further study and a greater level of investigation and assessment is required prior to design, consultation and implementation. The deliverability in terms of con-



Figure 4-7 Identified Walking Infrastructure Improvements

straints, risks and costs for multiple options are all important considerations alongside the relative benefits and detriments.

Incorporating the Sheppey Towns LCWIP

Two LCWIPs were undertaken simultaneously across Swale in 2023 and 2024. One LCWIP was the Swale Borough-wide LCWIP (which has been detailed in this report) and the other focused on the Isle of Sheppey. The Swale LCWIP identified distinct walking and wheeling routes/ improvements and cycling routes/ improvements whereas the Sheppey Towns LCWIP identified combined walking and cycling active travel routes and improvements.

Similar to cycling routes, the active travel routes from Sheppey Towns LCWIP have been incorporated into the Swale LCWIP in order to streamline these two documents and put forward a coherent network of active travel routes across the Borough. The walking network and interventions which will be consulted on by the public therefore combine these two LCWIPs.

The identified active travel routes identified as part of the Sheppey Towns LCWIP can be seen in **Appendix C and Appendix F**.

05

Sheppey Towns LCWIP

Sheppey Towns LCWIP Active Travel Routes

As per the Swale LCWIP, the Sheppey Towns LCWIP was developed in line with DfT's LCWIP guidance.

The identified network can be seen in Figure 5 -1. This network, together with the identified cycling and walking networks identified through the Sheppey LCWIP will be consulted on as a Borough-wide LCWIP.

Establishing Infrastructure Improvements

Proposed interventions were identified through a comprehensive desktop analysis and route audits. Some of the identified interventions included:

- Mini-roundabout improvements;
- Major junction improvements;
- Crossing improvements; and
- Infrastructure improvements.

Appendix C and Appendix F shows the detailed routes and interventions.

Figure 5-2 and 5-3 show the LCWIP cycling and walking networks identified as part of the LCWIPs alongside the proposed active travel network across Swale. This demonstrates the interdependencies between the forthcoming active travel schemes as well as their coverage across the Borough.

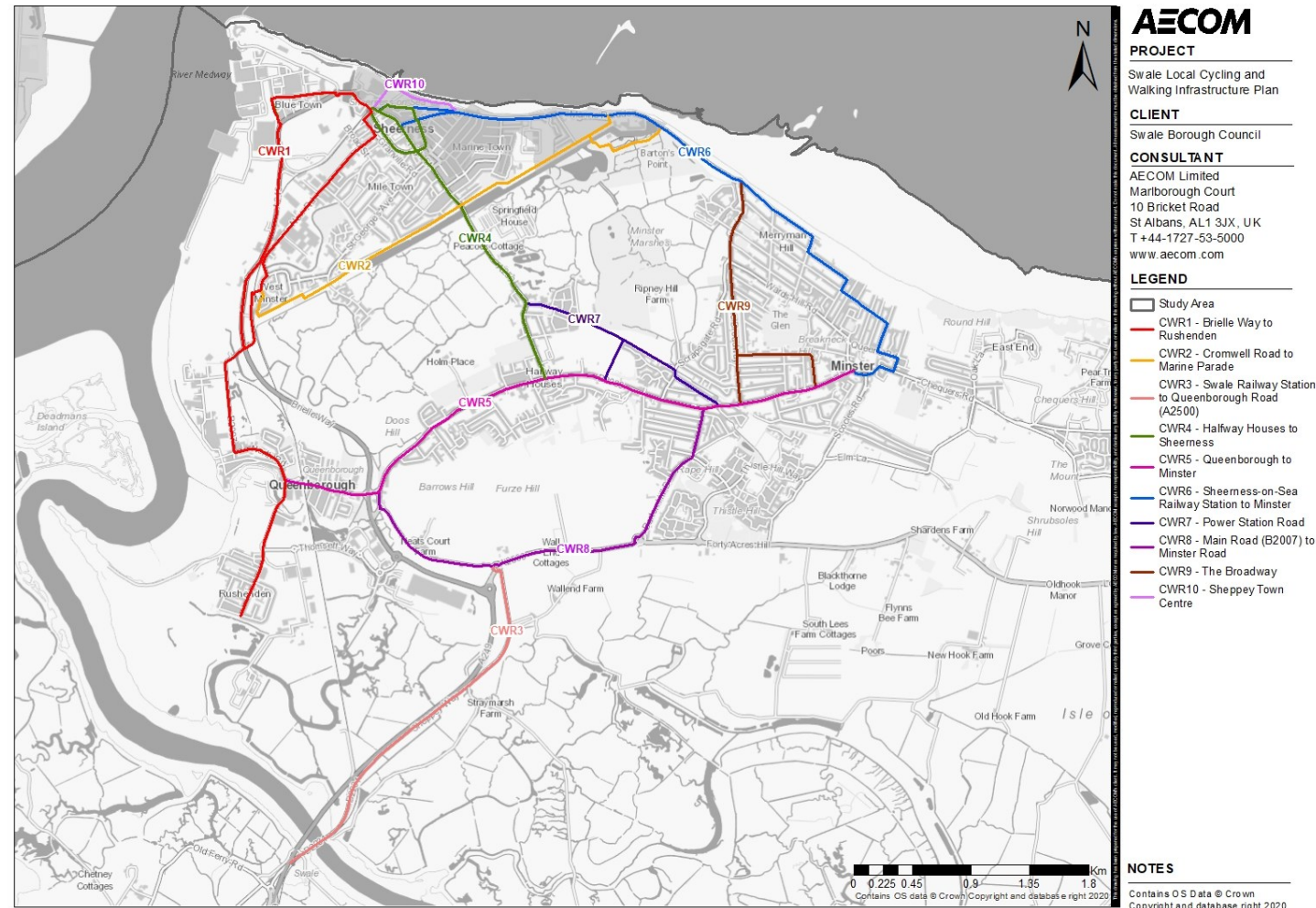


Figure 5-1 Sheppey Towns LCWIP Active Travel Routes

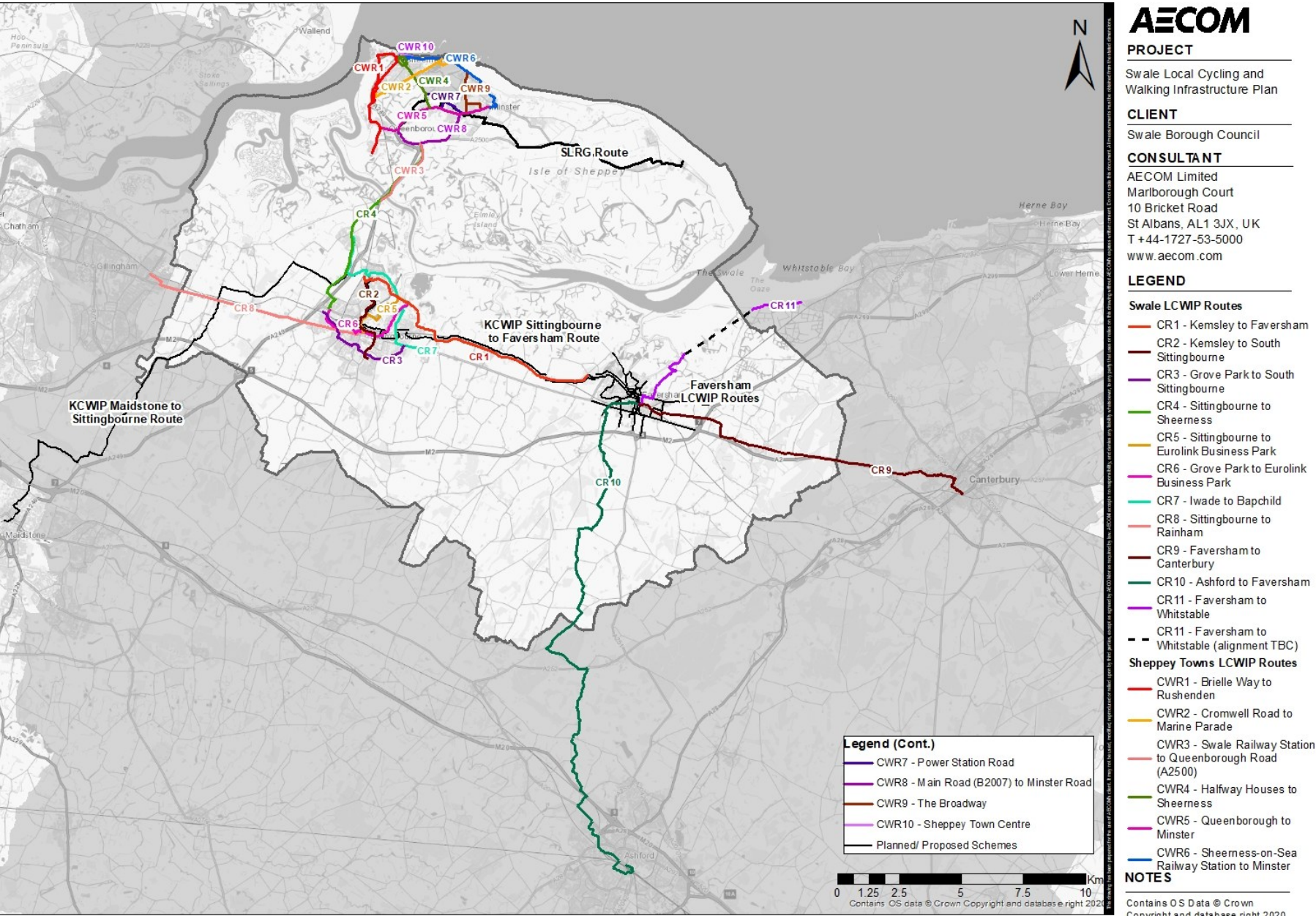


Figure 5-2 Proposed Cycling Network Across Swale

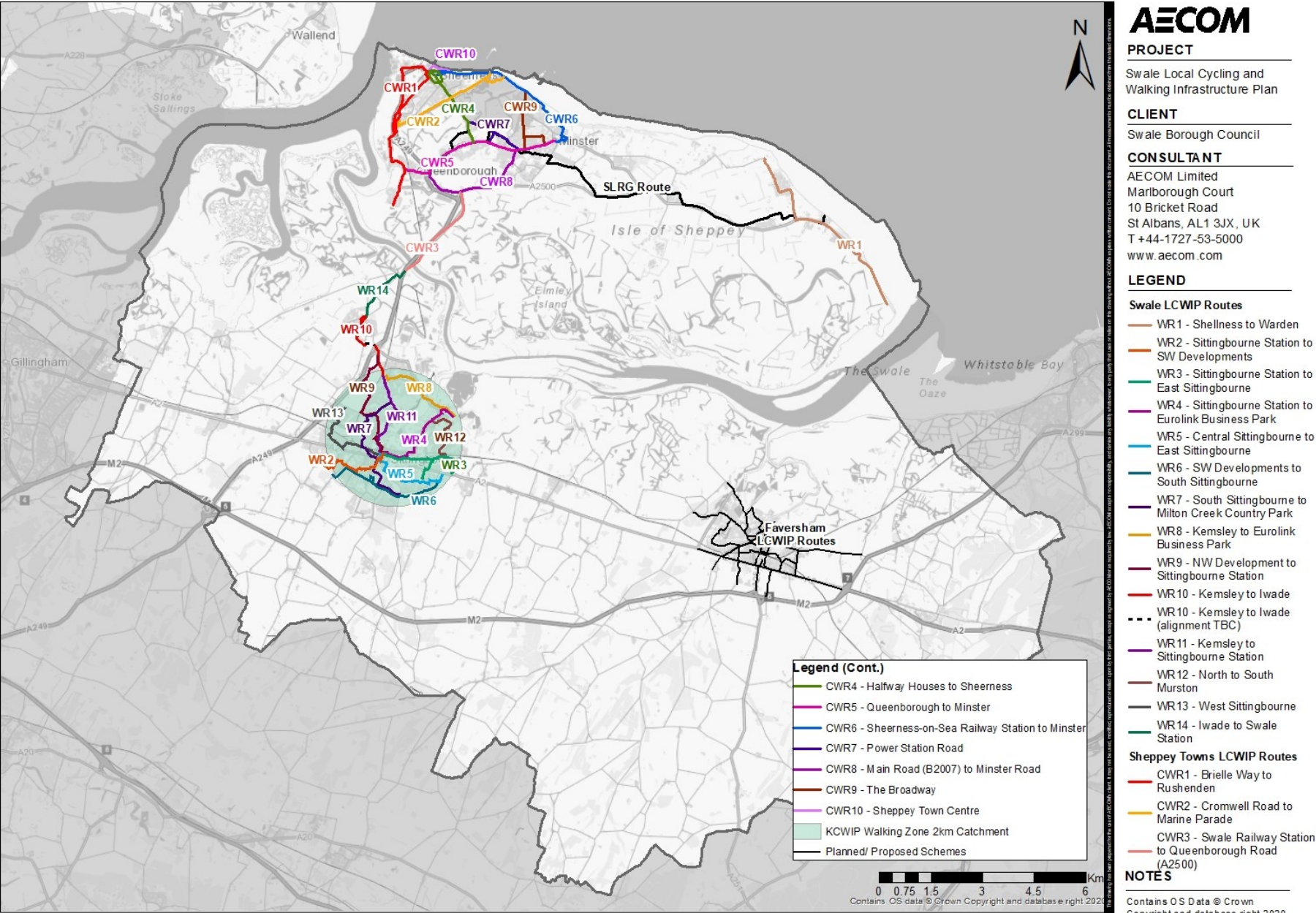


Figure 5-3 Proposed Walking Network Across Swale

06

Summary

Summary

In **Stage 2** of this report the area context was outlined in terms of its demographics, existing and future transport network, collisions, trip generators and trip patterns.

Swale is a largely rural district but has significant concentrations of population and employment in the main urban areas of Faversham, Sittingbourne as well as the towns of Minster-on-Sea, Queensborough and Sheerness on the Isle of Sheppey.

Car ownership is generally high in the more rural areas of the district, but there are relatively low levels in the urban areas.

Towards the easternmost point of the Isle of Sheppey there are also low levels of car ownership, despite its more rural composition. This area of Swale has some of the highest levels of deprivation in the country, scoring in the lowest decile on the Index of Multiple Deprivation (IMD) alongside areas of Sheerness, Faversham and Sittingbourne. As a result of the deprivation levels on the Isle of Sheppey there are two areas which are classified as 'Left-Behind Neighbourhoods'.

There are education facilities, tourist attractions, and medical care sites located across the district, but shopping, leisure and health facilities are concentrated within the urban areas.

Future housing, employment and mixed-use

developments, the largest of which is located in Sheerness, will generate considerable future traffic movements.

The current active travel and public transport network is limited outside of Faversham and Sittingbourne.

In regard to the rail network, Faversham and Sittingbourne are served by regular services into London. The Isle of Sheppey is served by a regular branch line service to Sittingbourne, but interchange is required for onward travel.

The PRoW network coverage largely aligns with areas of high population and employment density, while the Isle of Sheppey has a relatively sparse network.

The cycle network consists of the long-distance National Cycle Network routes and more local cycle routes and lanes. The local network, although more developed in urban areas, is generally limited and fragmented and the quality of provision varies significantly.

The NCN follows runs between Faversham and Sittingbourne, and north to Queensborough from Sittingbourne. This is the only significant north-south cycle connection linking the Isle of Sheppey to the rest of the district. The area of rural Swale has very limited cycling infrastructure.

Swale is relatively well-connected in terms of its Highway Network with the A2 and the M2

linking the district to the rest of Kent and London.

Collision data shows that incidents involving cyclists and pedestrians are more frequent on the strategic roads in the district, most notably the A2 and the A249, and that there are only limited incidents of collisions involving cyclists and pedestrians in urban centres.

Active travel patterns in Swale have been ascertained using the PCT tool, VISUM data, and STRAVA data. There are significant flows of walking and cycling within urban areas in the district but PCT data suggests that there are presently limited numbers of inter-urban cycle trips for commuting purposes.

STRAVA data points to greater levels of cycling on inter-urban routes for leisure purposes. Future year PCT and VISUM scenarios indicate that there is potential for modal shift to occur for commuting trips of all lengths.

Cycling (Stage 4) and Walking (Stage 5) networks were developed, through an iterative process that considered current and future trip generators, future development and planned active travel schemes, as well as the local knowledge of key stakeholders. Interventions were identified along the proposed to create a safe, accessible and attractive environment for walking and cycling in Swale.

At this stage, the Sheppey Towns LCWIP active travel network and interventions were

incorporated into the Swale LCWIP to ensure these two schemes were aligned and the forthcoming network was coherent. Subsequent stages of the Swale LCWIP such as public engagement and integration and application will refer to the Swale LCWIP, which incorporates the Sheppey Towns LCWIP.

progress made with its implementation and to apply any necessary adjustments.

Next Steps

At the next stage, public consultation will be conducted to ensure the proposed networks address the needs and concerns of local residents, the future users.

For the realistic and practical implementation of the plan, the walking and cycling routes will be assessed and prioritised based on policy, strategy, deliverability and financial priorities. The result of this process will suggest which routes should be prioritised in order to achieve the most benefits.

Once the proposed routes and interventions have been sorted into short, medium and long term priorities, the schemes will undergo additional assessments such as concept design or feasibility design to better understand how these schemes might look on the ground.

The LCWIP is a live, 10-year document and to ensure it remains relevant and aligned with future policies and strategies, it is important that it is reviewed and updated frequently. Frequent reviews will help to reflect on the



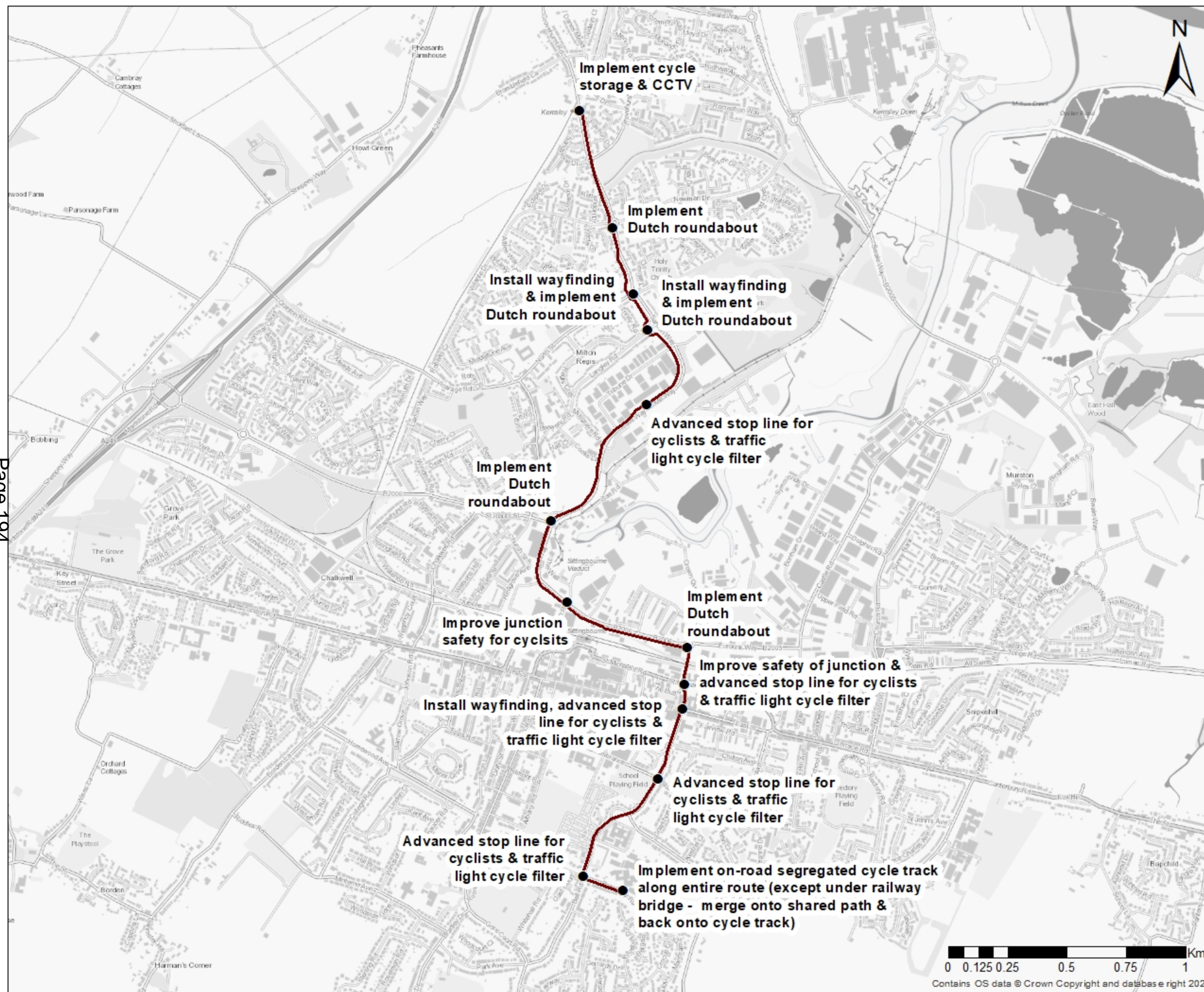
Appendix A - Origin and Destination Clusters

Origin and Destination Clusters

Origin	
Cluster Name	Comment
Bapchild	Large strategic growth site
Borden	High population density, strategic growth site
Boughton	High population density
Bysing Wood	High population density, strategic growth site
Central Sittingbourne	High population density, strategic growth site, rail station
Davington	High population density
Faversham East	High population density, Faversham rail station
Faversham North	High population density, strategic growth site
Faversham South	High population density, strategic growth site
Faversham West	High population density
Grove Park	High population density
Halfway Houses	Strategic growth site
Iwade	Large strategic growth site
Kemsley Developments	High population density, strategic growth site, rail station
Marine Town	High population density
Merryman's Town	High population density
Minster on Sea	High population density, development site
Newington	Strategic growth site, rail station
Preston Developments	High population density, strategic growth site
Queenborough	Strategic growth site, rail station
Selling	Rail station, local village
Snipeshill	High population density
South-West Minster	High population density, development site
Teynham	High population density, Teynham rail station
Upchurch	High population density
Warden	High population density

Destination	
Cluster Name	Comment
Central Faversham Business Areas	High employment density area including BMM Weston and Shepherd Neame
Chalkwell/Westlands School	High employment density, Major school, key employment hub
Eastchurch	Local centre with GP, key school etc.
Eurolink Business Park	High employment density, key employment hubs.
Faversham Town Centre	Town centre, employment density, hospital and other attractors including Faversham Cottage Hospital
GIST SN Distribution GX0 Plus	Key employment hub
Halfway Houses	Major schools, Local Centre
HMP Swaleside and Eastchurch Aviation	Key employment hub and tourist attraction
Kemsley Industrial Areas	High employment density, key employment hubs, strategic growth site
Kent Science Park	Key employment hub
Leysdown	Leysdown high-street, local centre, beach, school
London Road Industrial Parks	Two proximate key employment hubs
Milton Regis	Key schools, GPs, other trip attractors, high employment density
Minster	Minster abbey, key schools
Mount Ephraim	Key tourist site
North Faversham	High employment density, Brents Industrial Estate, Education sites inc major school
Queensborough Industrial Areas	Key employment hubs
Sheerness Industrial Areas	Key employment hubs
Sheerness Town Centre	Key local centre, schools, GPs, other trip attractors, Sheppey College
Sittingbourne Retail Park	Key employment hubs, major retail park
Sittingbourne South	Major schools, high employment density, key retail sites, hospital
Sittingbourne Town Centre	High employment density, key retail site, major local centre
Snipeshill	Key education area with several large schools
Teynham	Key employment hub and education sites
Thistle Hill	GP, hospital, schools

Appendix B - Sittingbourne Cycling Routes and Interventions



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LEGEND

- Study Area
- Route 2 - Kemsley to South Sittingbourne
- Cycling Interventions

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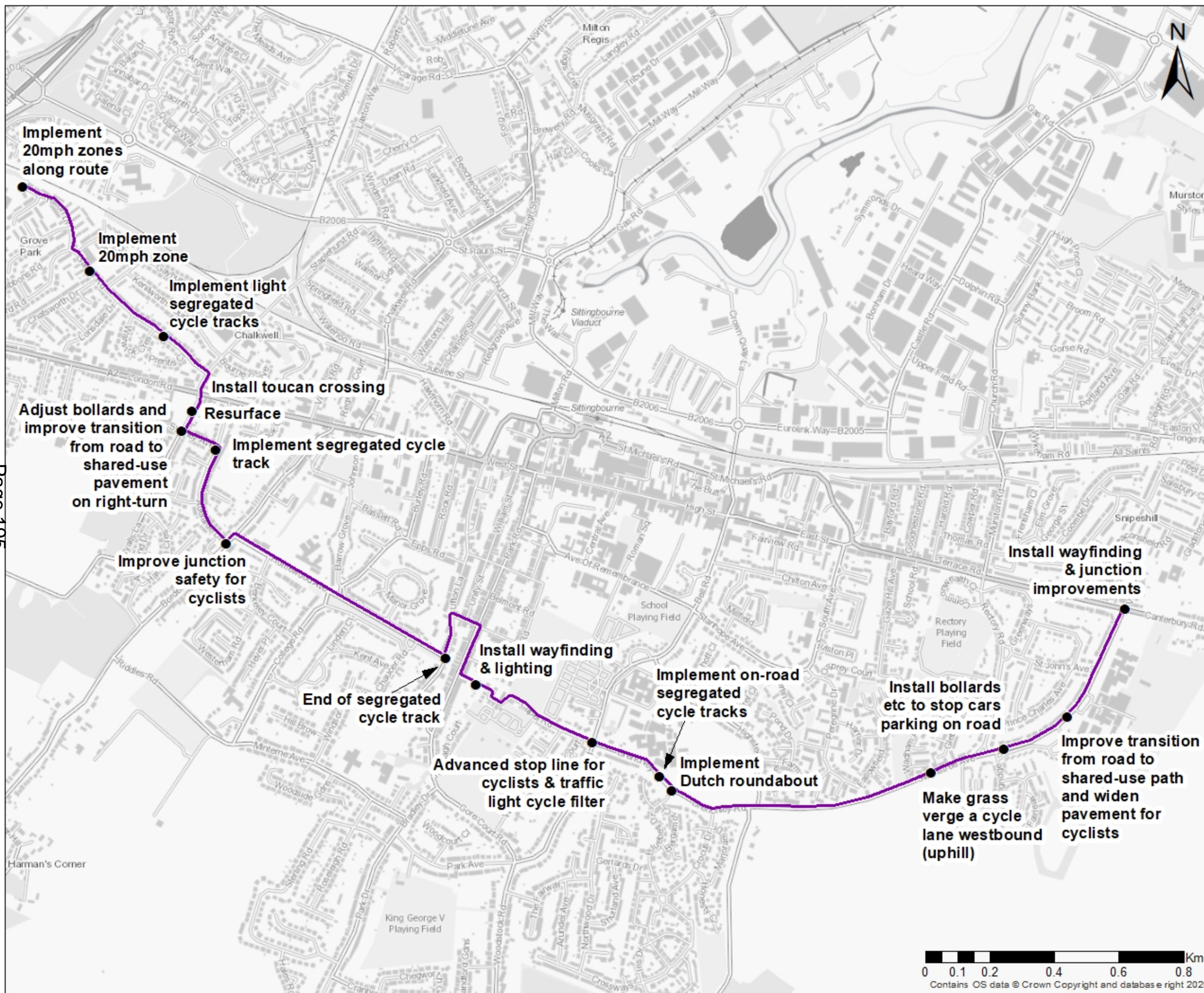
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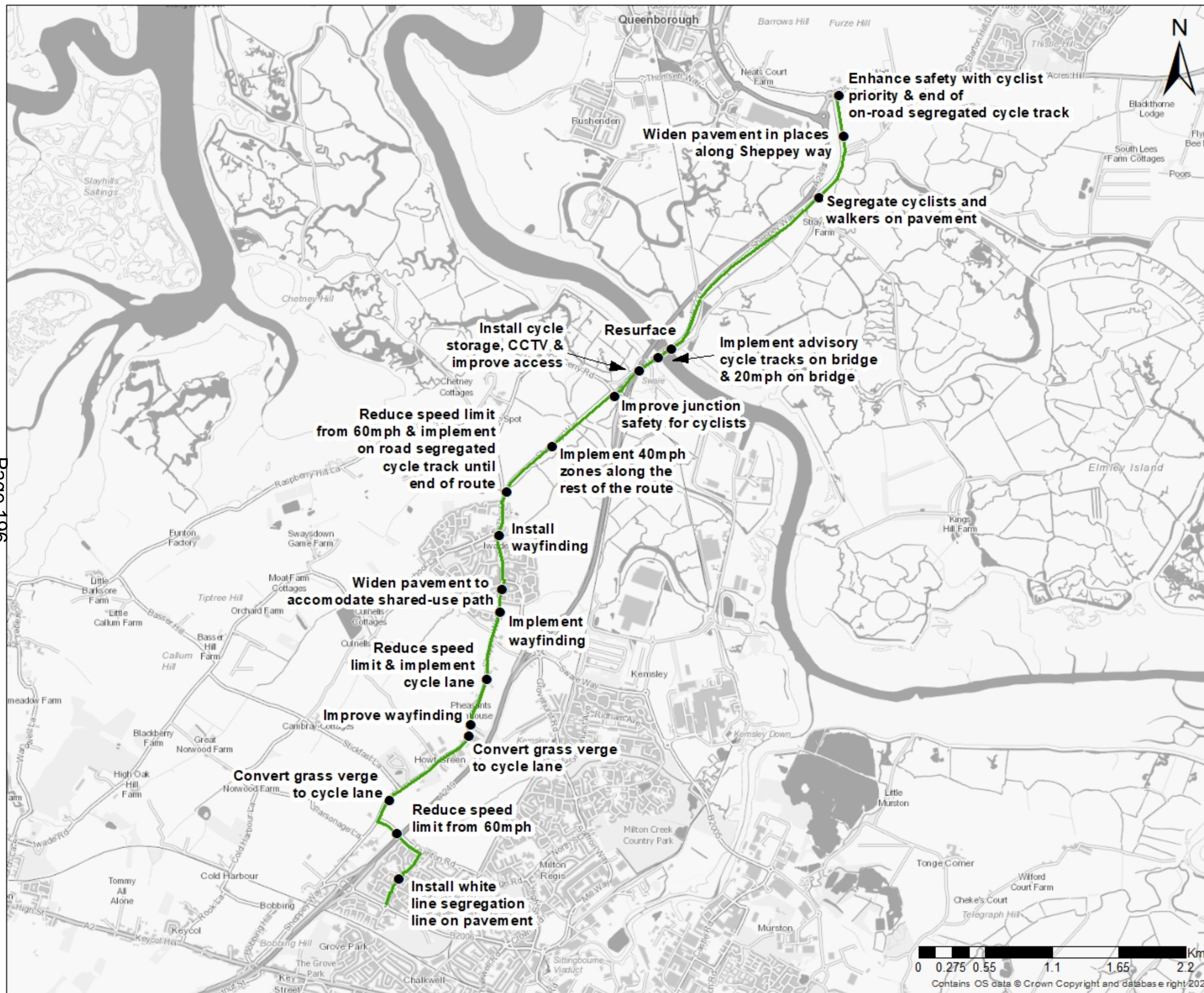
LEGEND

-  Study Area
-  Route 3 - Grove Park to South Sittingbourne
-  Cycling Interventions

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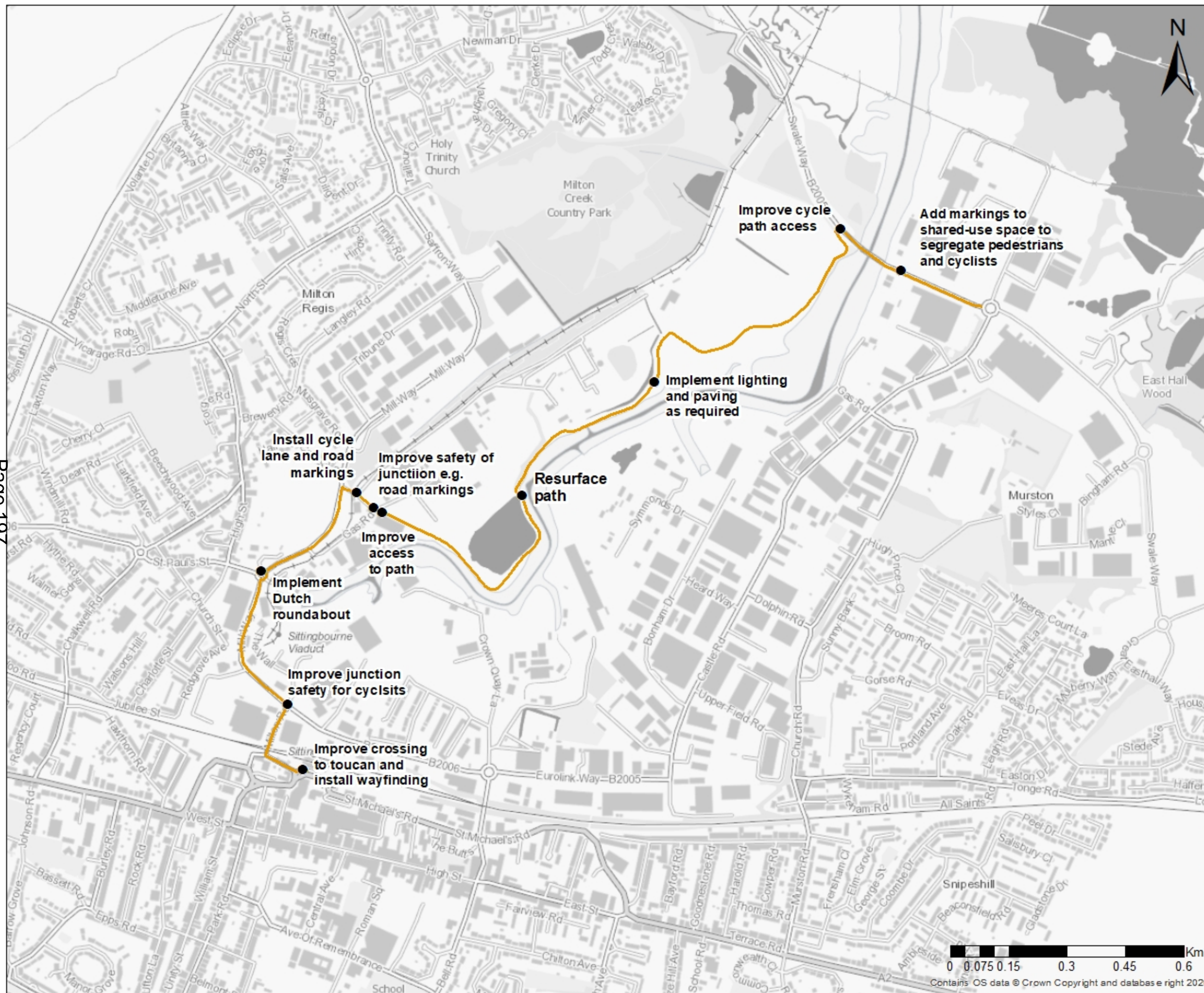
LEGEND

- Study Area
- Route 4 - Sittingbourne to Sheerness
- Cycling Interventions

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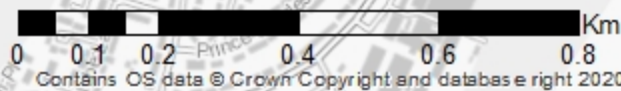
- Study Area
- Route 5 - Sittingbourne to Eurolink Business Park
- Cycling Interventions

NOTES

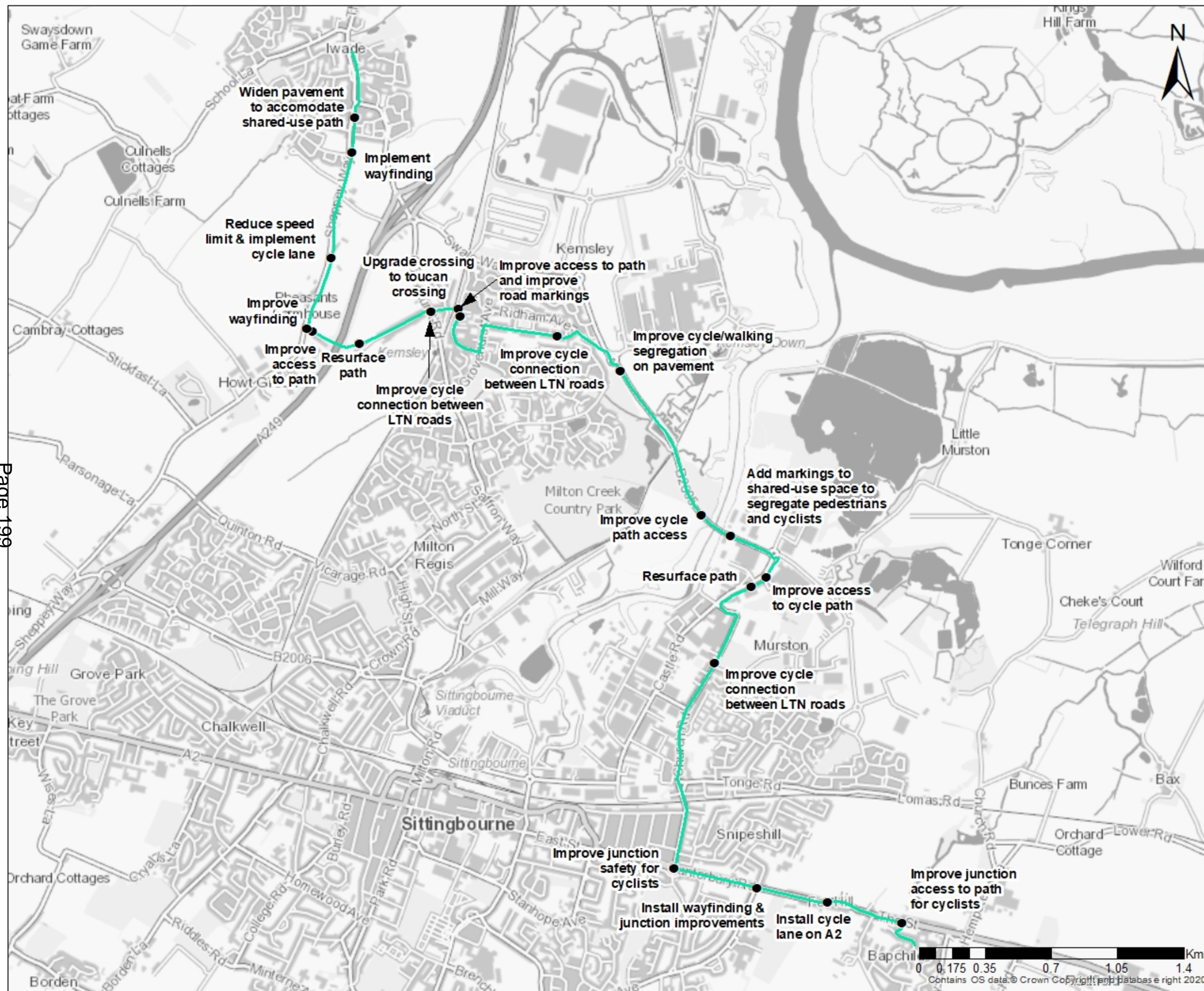
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LEGEND

- Route 7 - Iwade to Bapchild
- Cycling Interventions

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Appendix C - Isle of Sheppey Cycling Active Travel Routes and Interventions

The Broadway

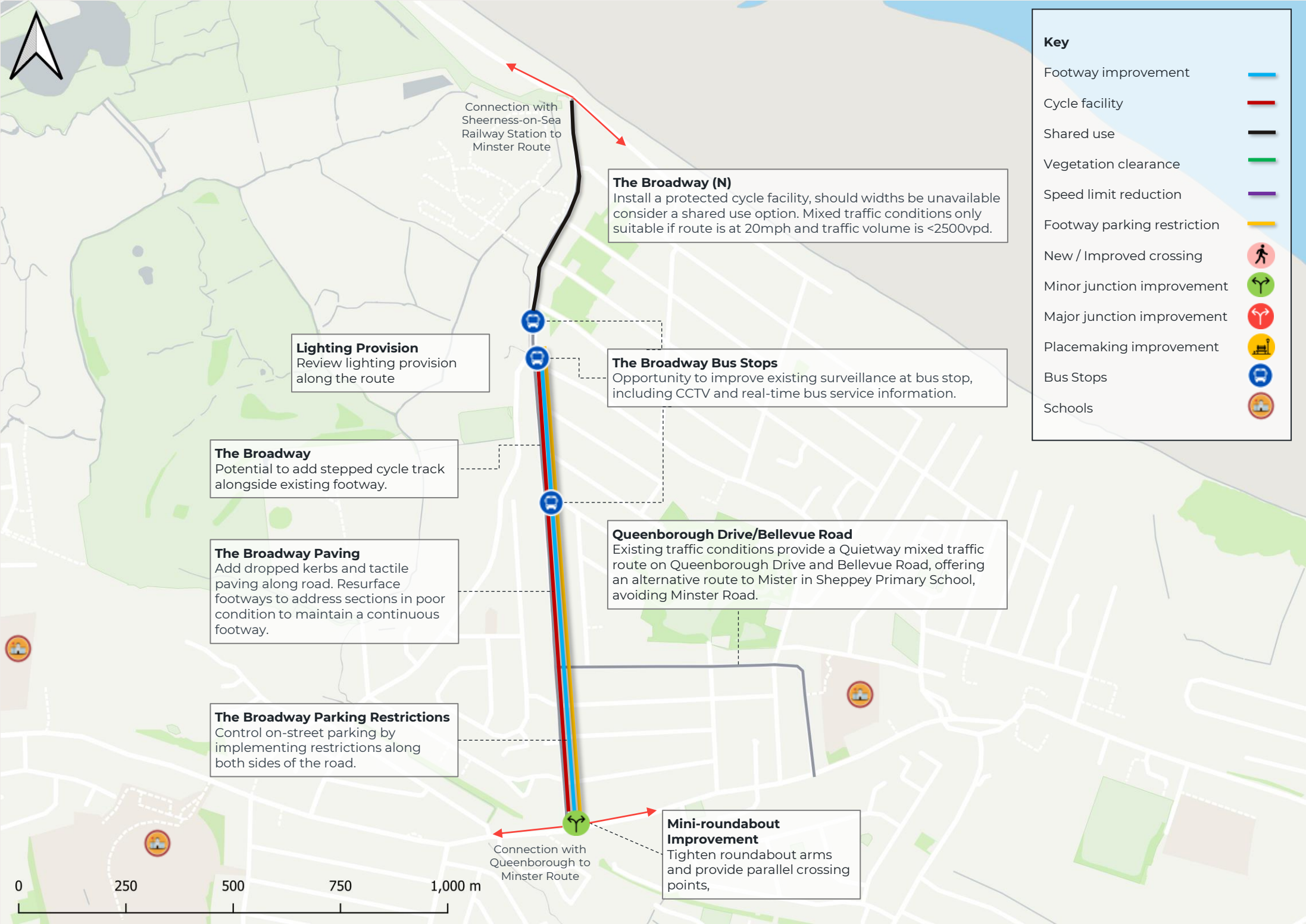


Figure 50 : The Broadway

Main Road (B2007) to Minster Road

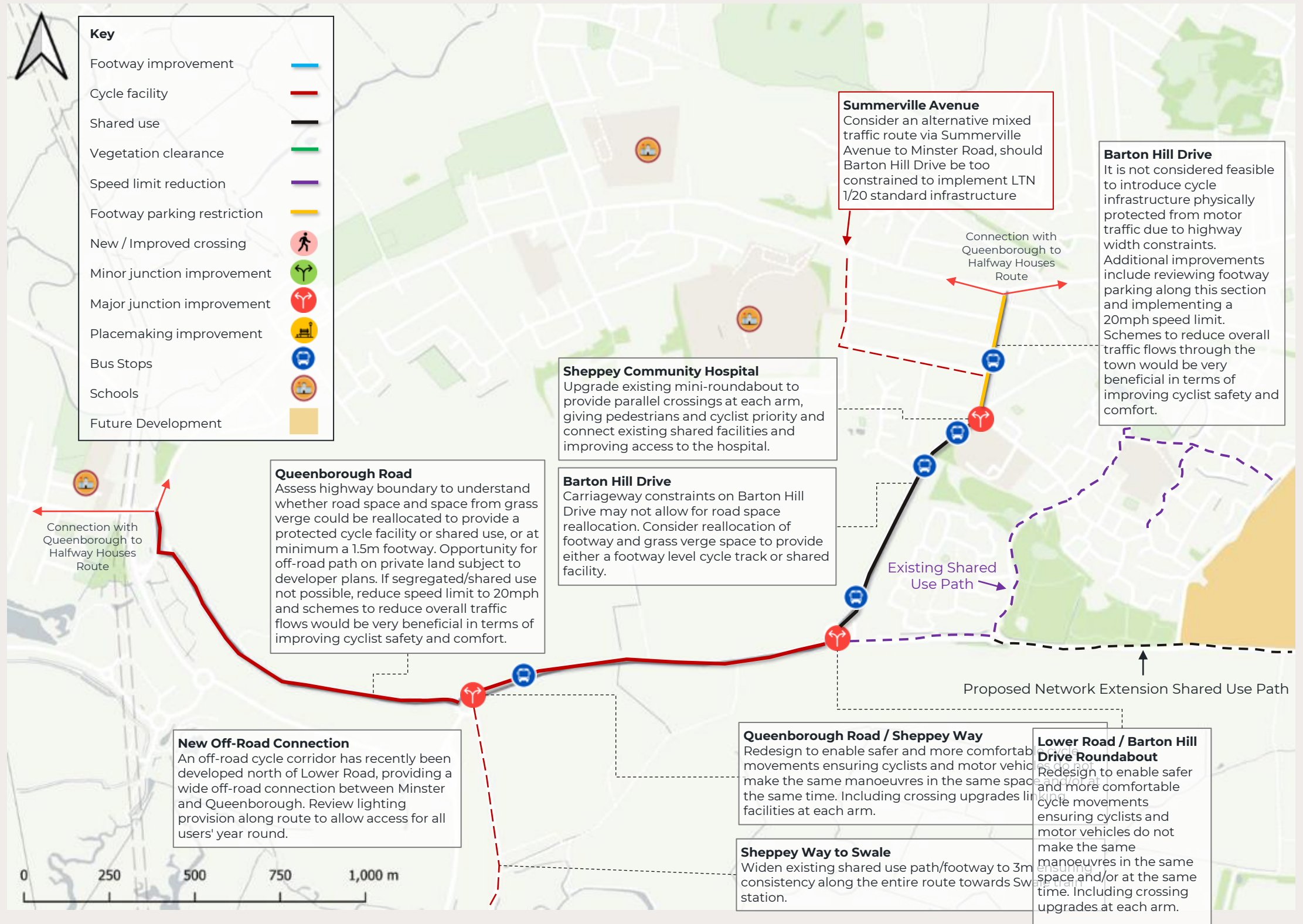


Figure 51 : Main Road (B2007) to Minster Road

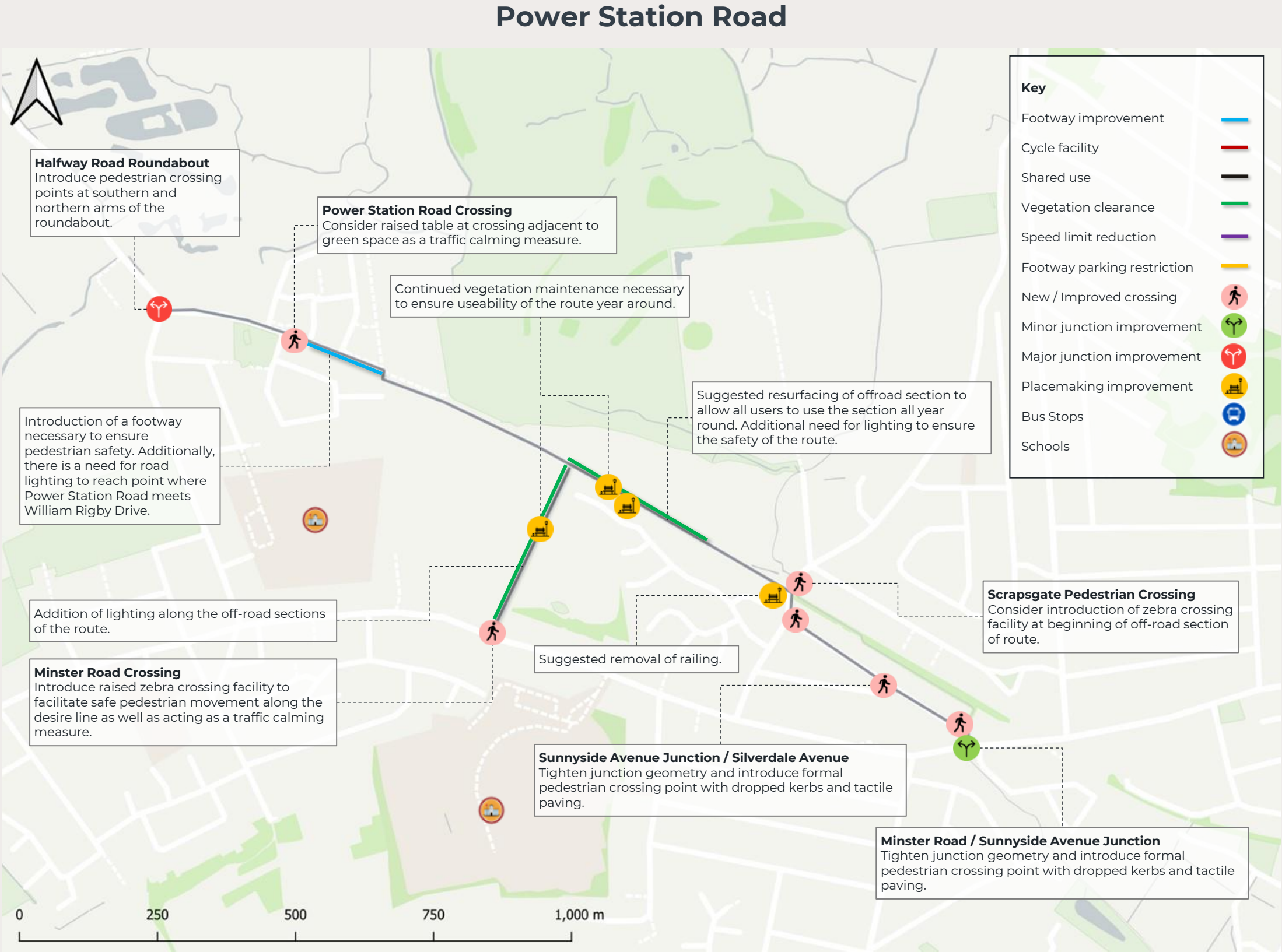


Figure 52 : Power Station Road

Brielle Way to Rushenden Road

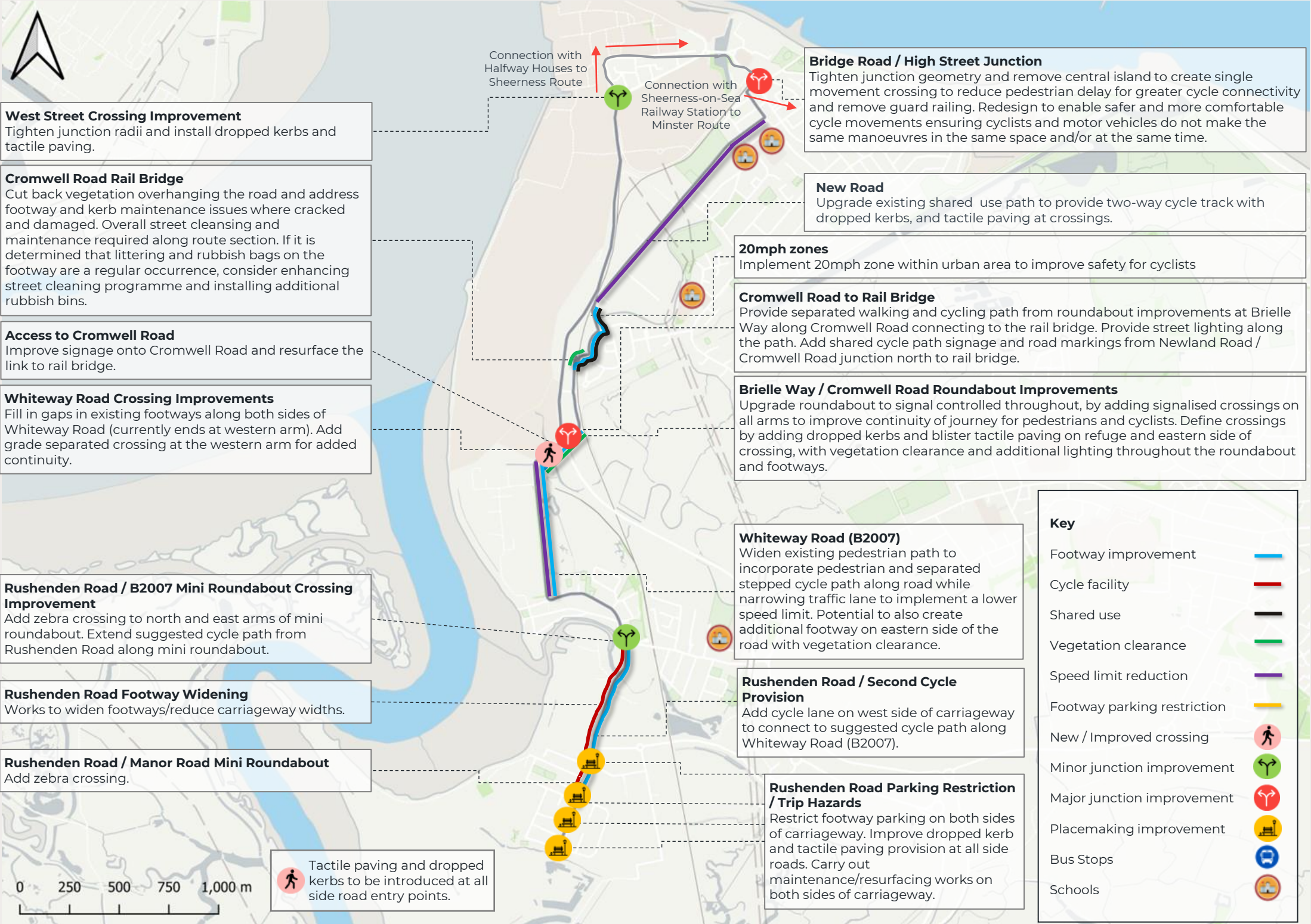


Figure 53 : Brille Way to Rushenden Road

Sheerness-on-Sea Railway Station to Minster

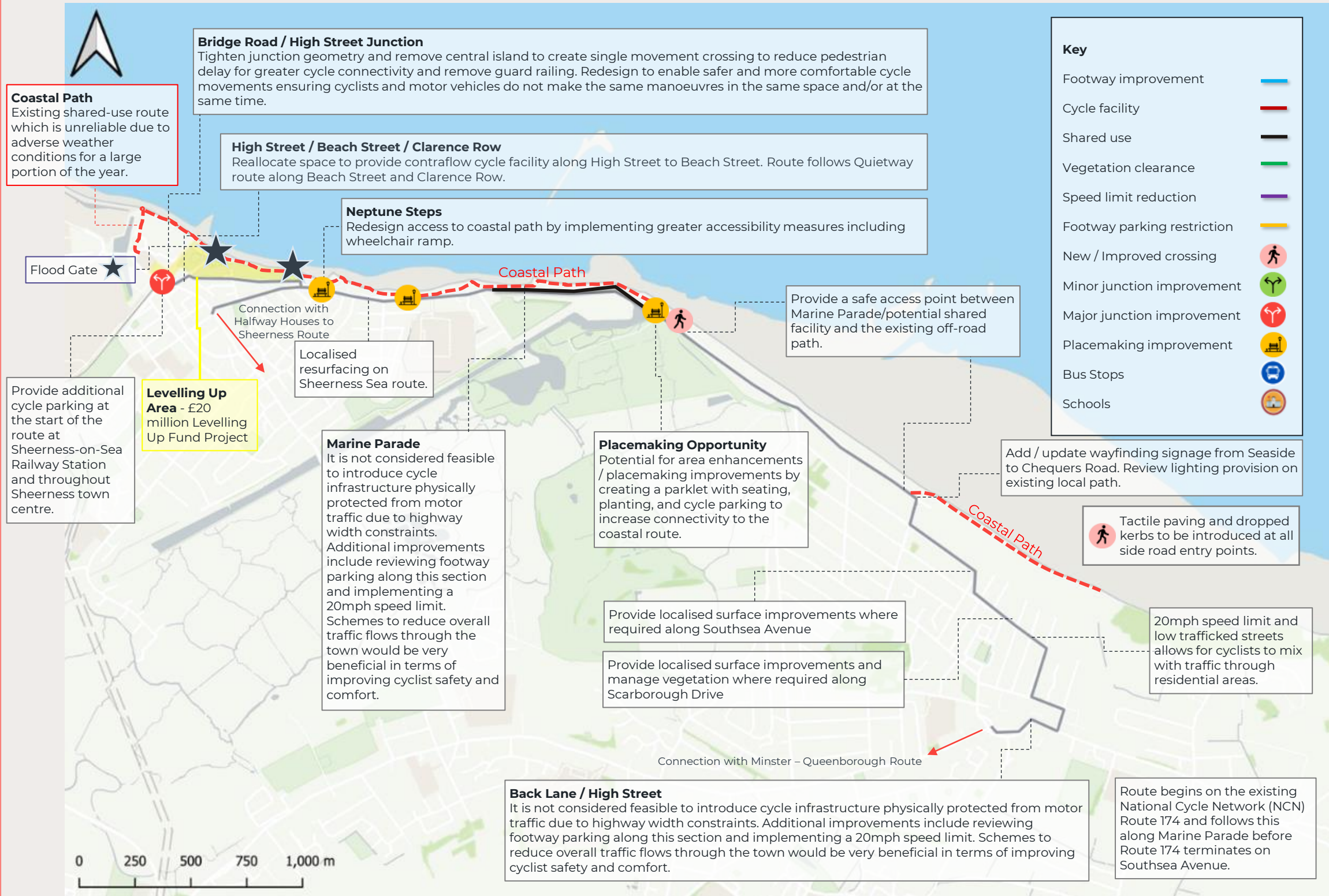


Figure 54 : Sheerness-on-Sea Railway Station to Minster

Queenborough to Minster



Figure 55: Queenborough to Minster

Halfway Houses to Sheerness

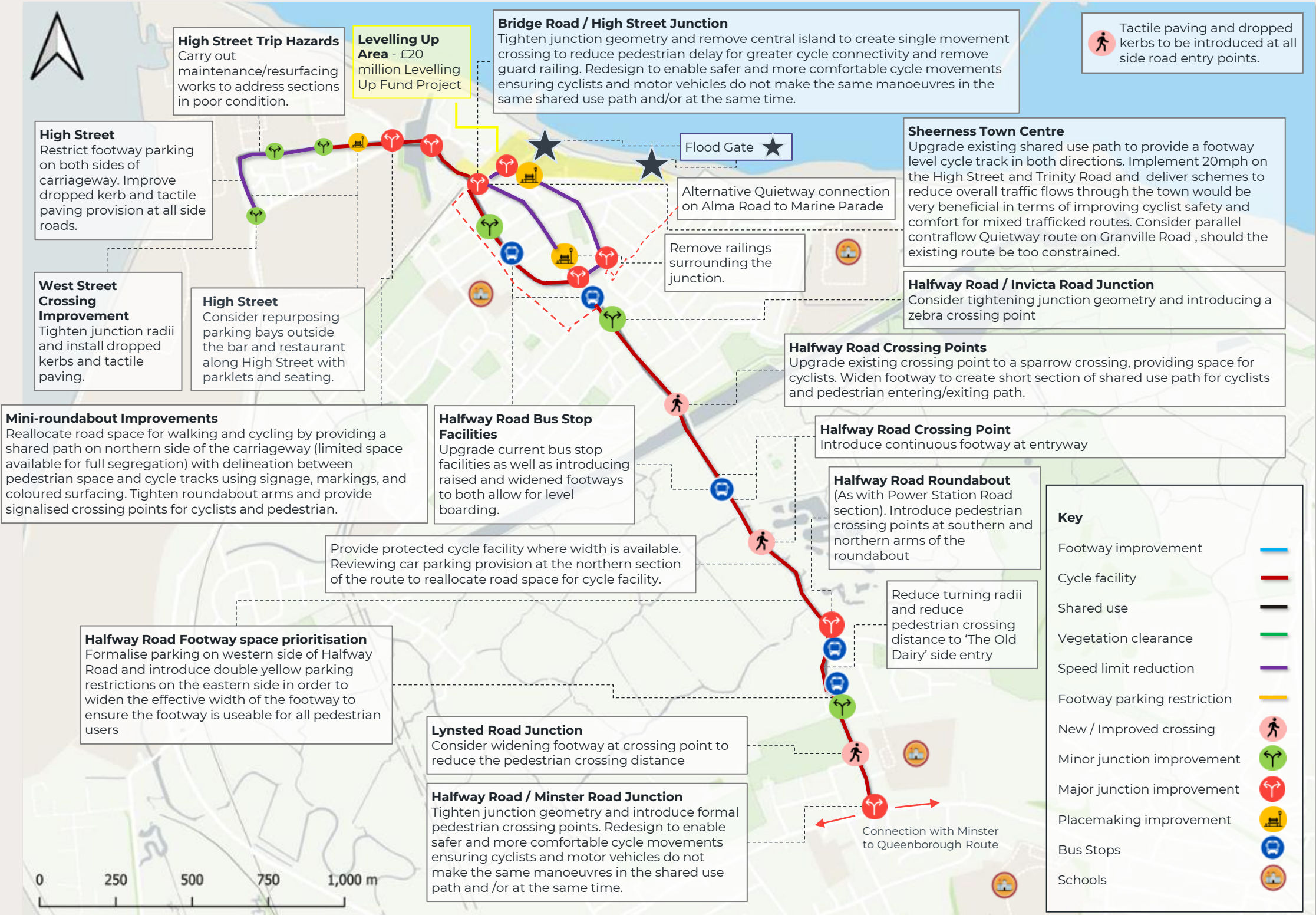


Figure 56 : Halfway Houses to Sheerness

Cromwell Road to Marine Parade

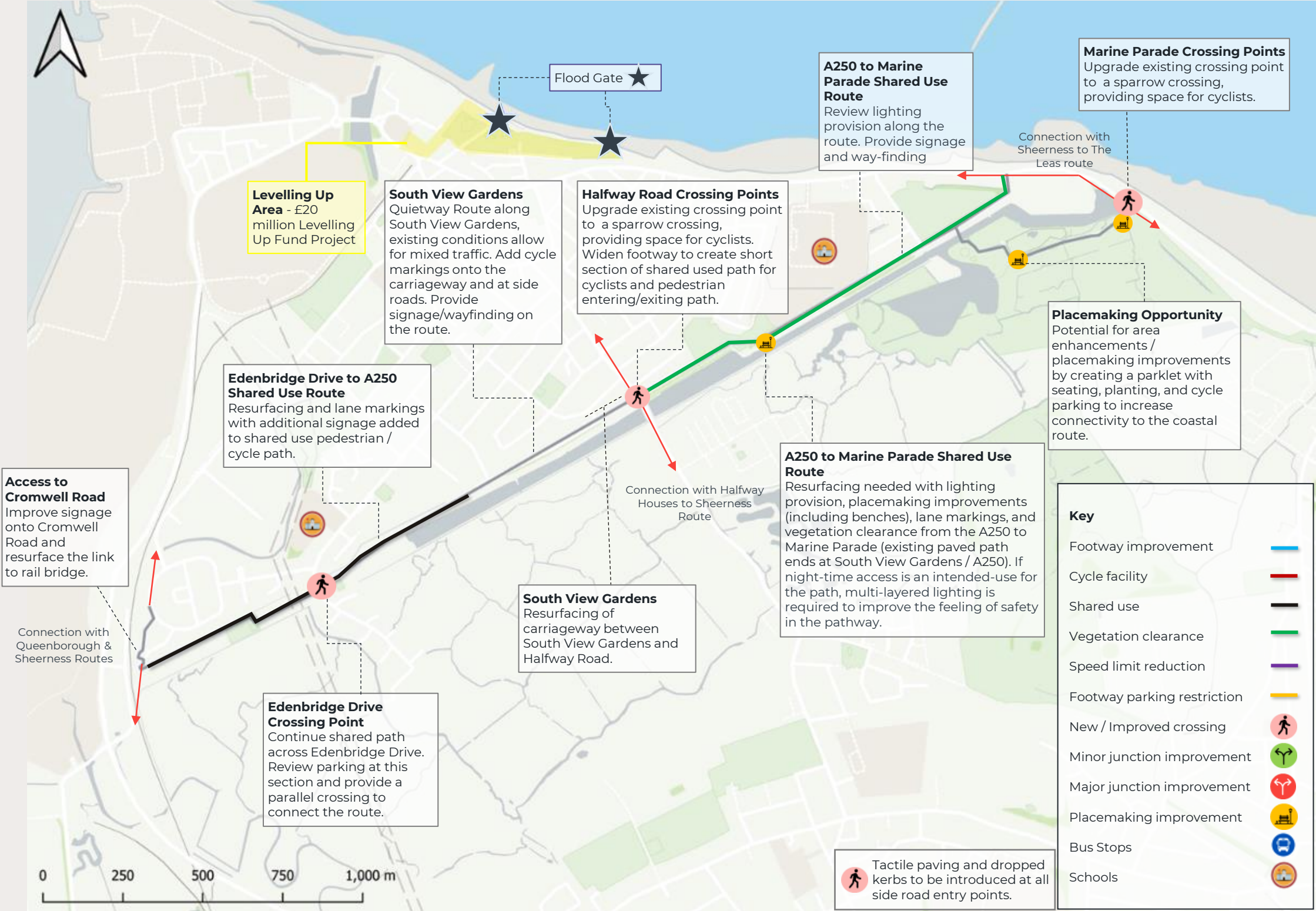


Figure 57 : Cromwell Road to Marine Parade

Swale Railway Station to Queenborough Road (A2500)

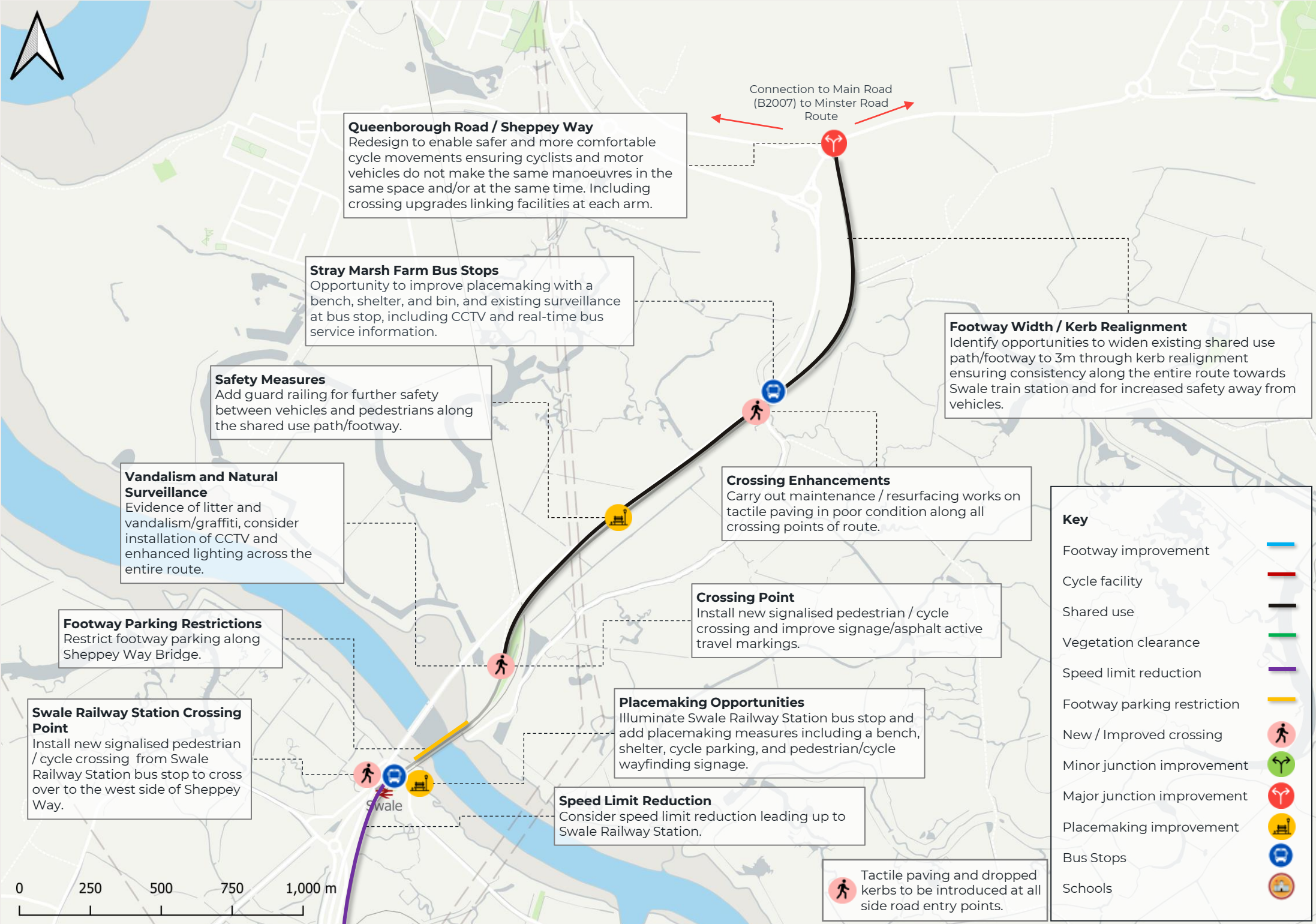
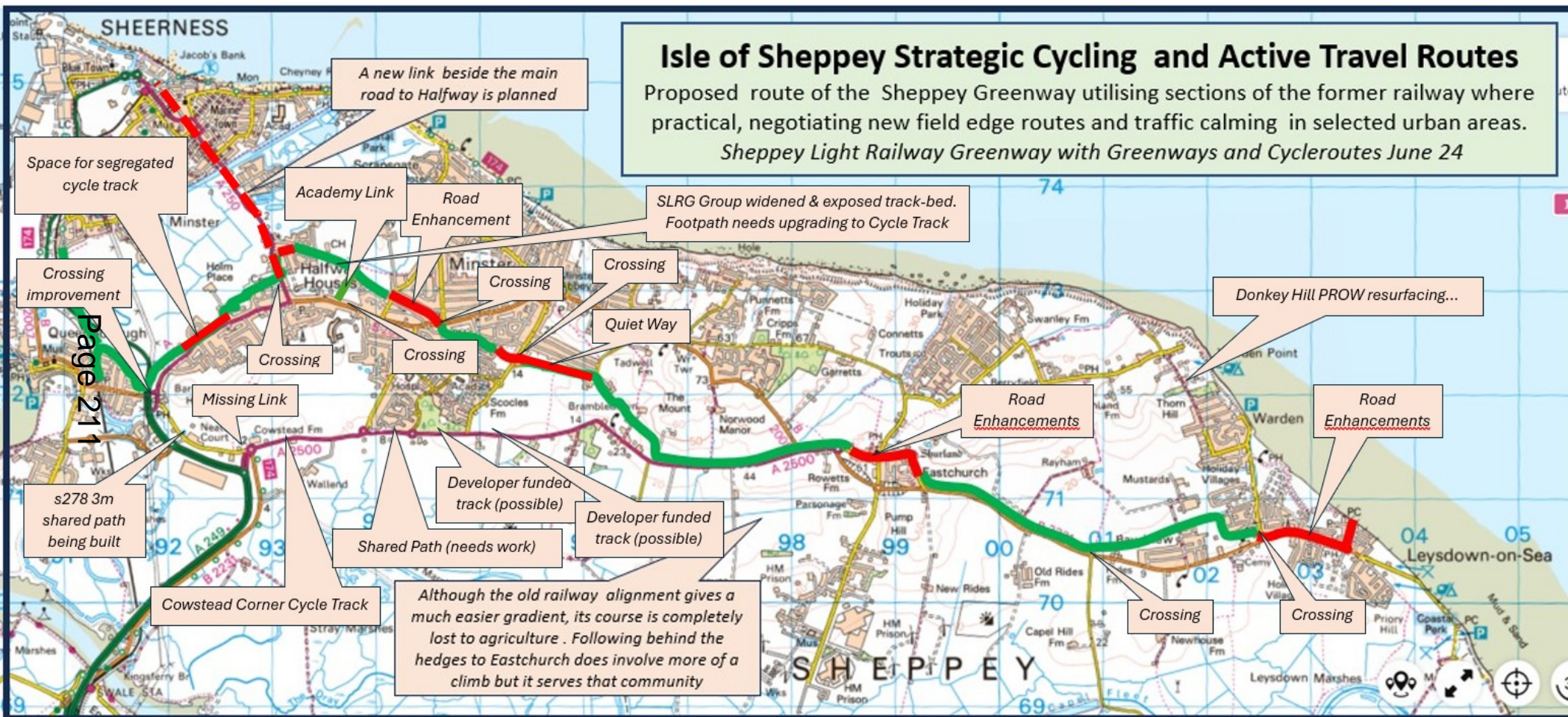


Figure 58 : Swale Railway Station to Queenborough Road (A2500)

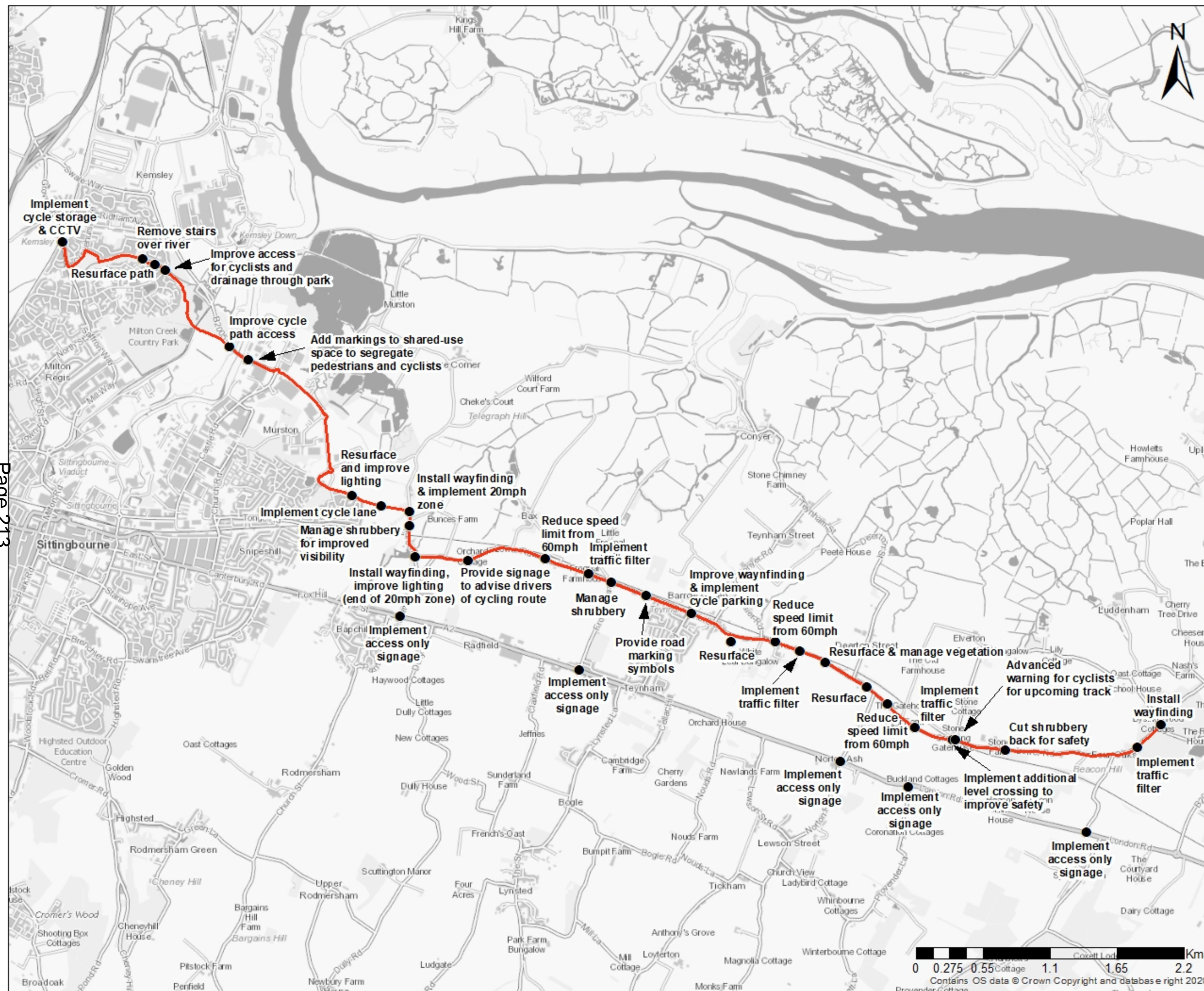
Sheerness Town Centre



Figure 59 : Sheerness Town Centre



Appendix D - Rural Swale Cycling Routes and Interventions



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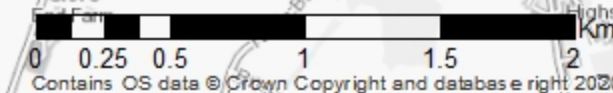
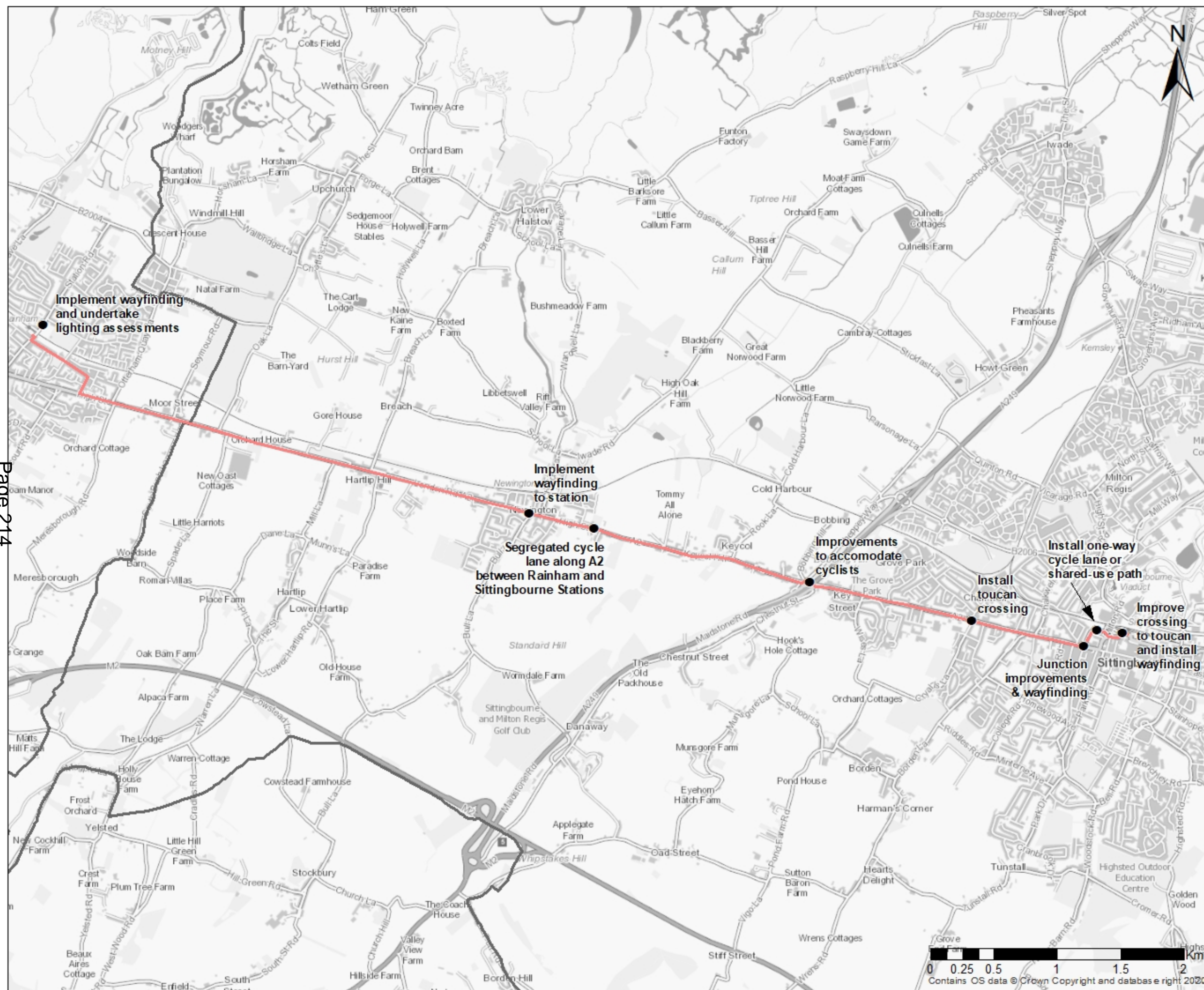
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LEGEND

- Route 8 - Sittingbourne to Rainham
- Cycling Interventions



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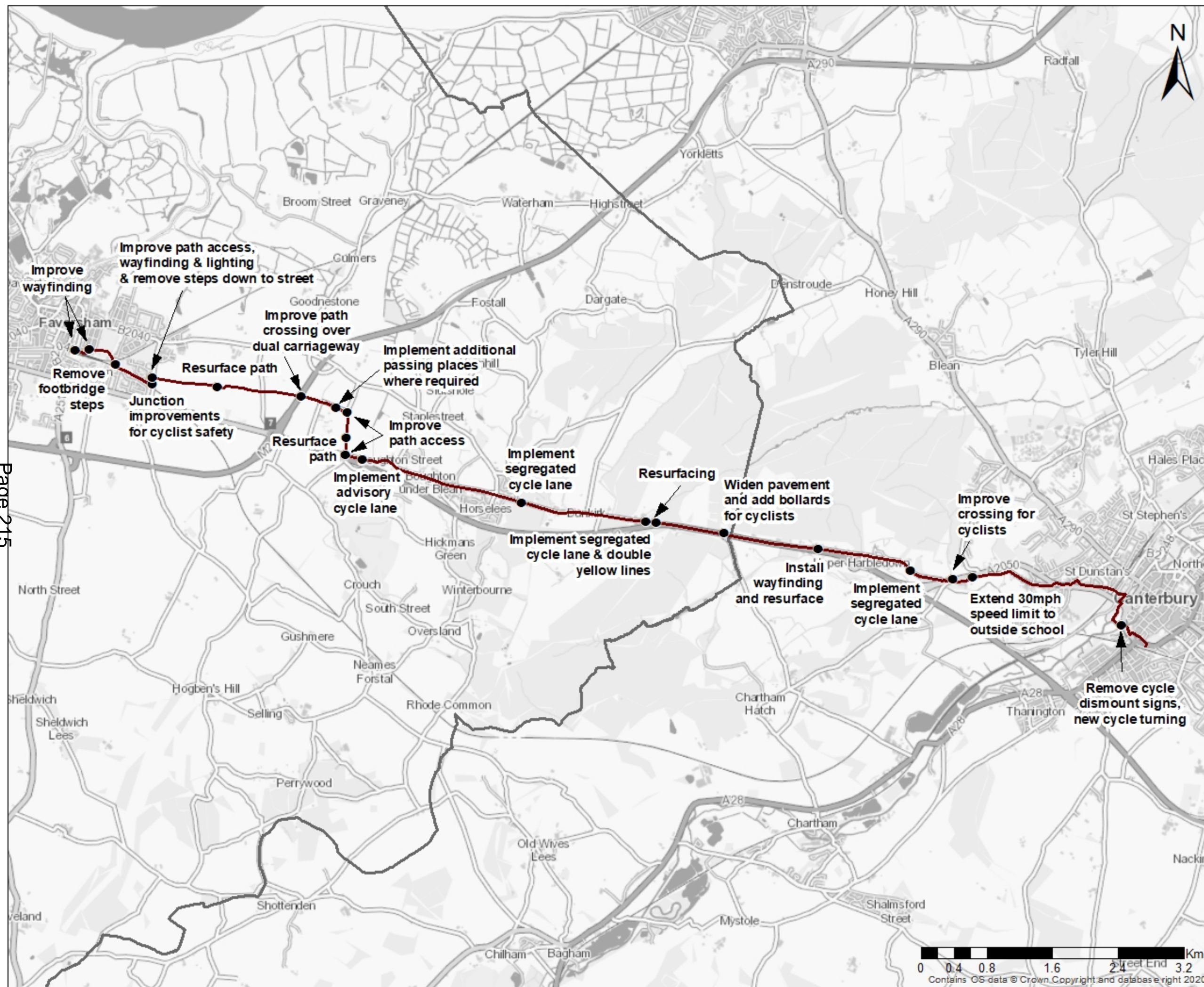
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LEGEND

- Route 9 - Faversham to Canterbury
- Cycling Interventions



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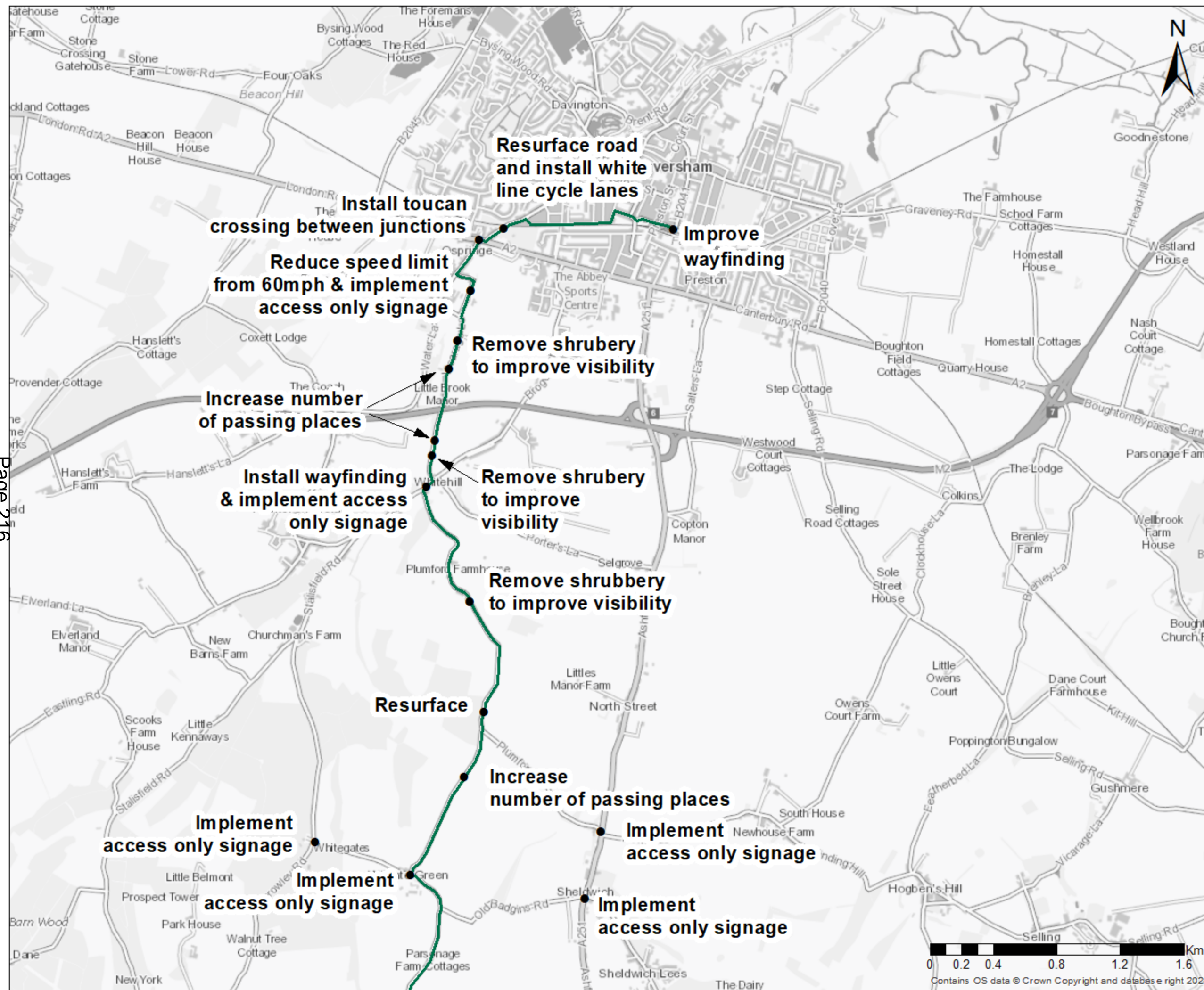
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LEGEND

- Study Area
- Route 10 - Ashford to Faversham
- Cycling Interventions

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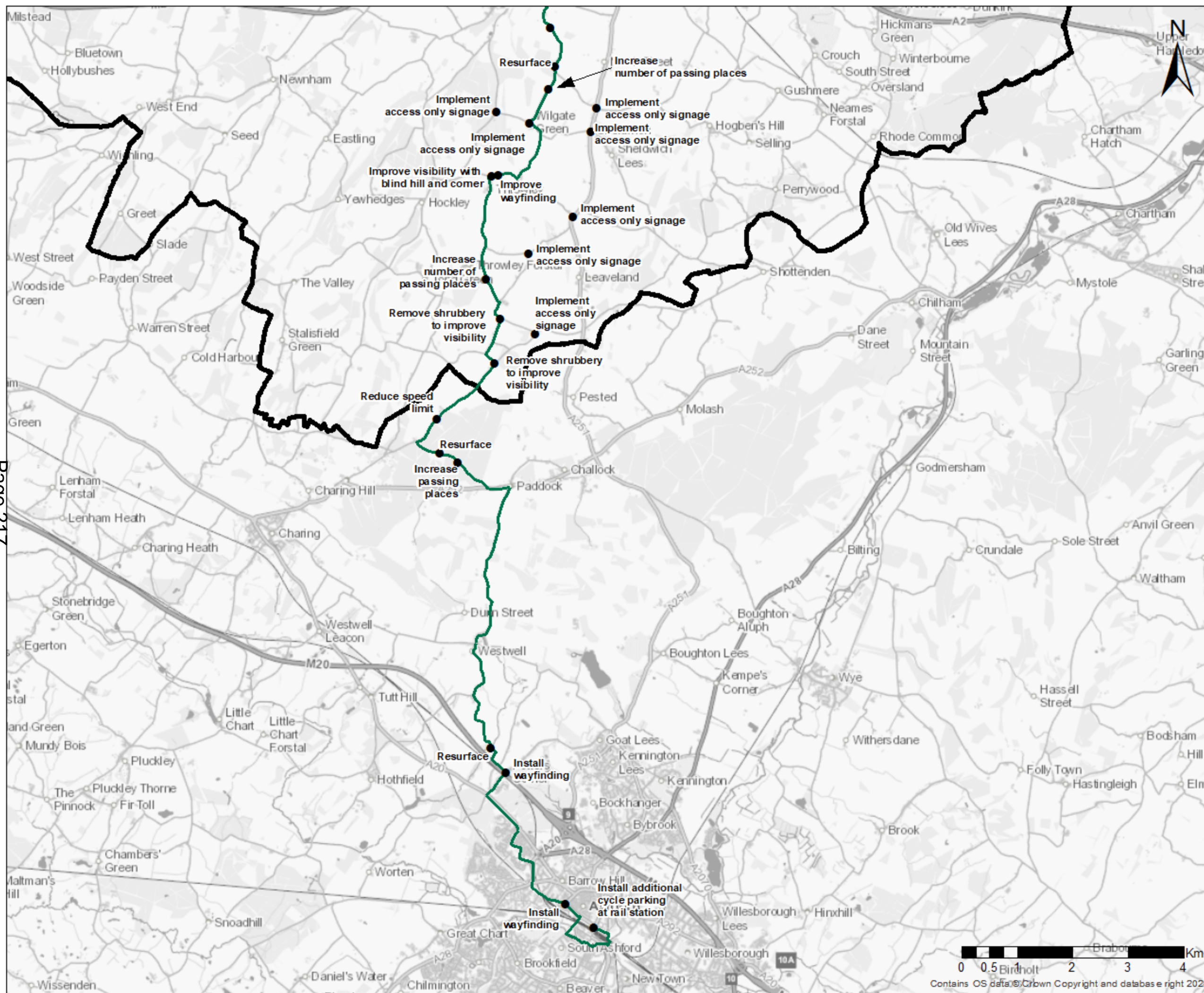
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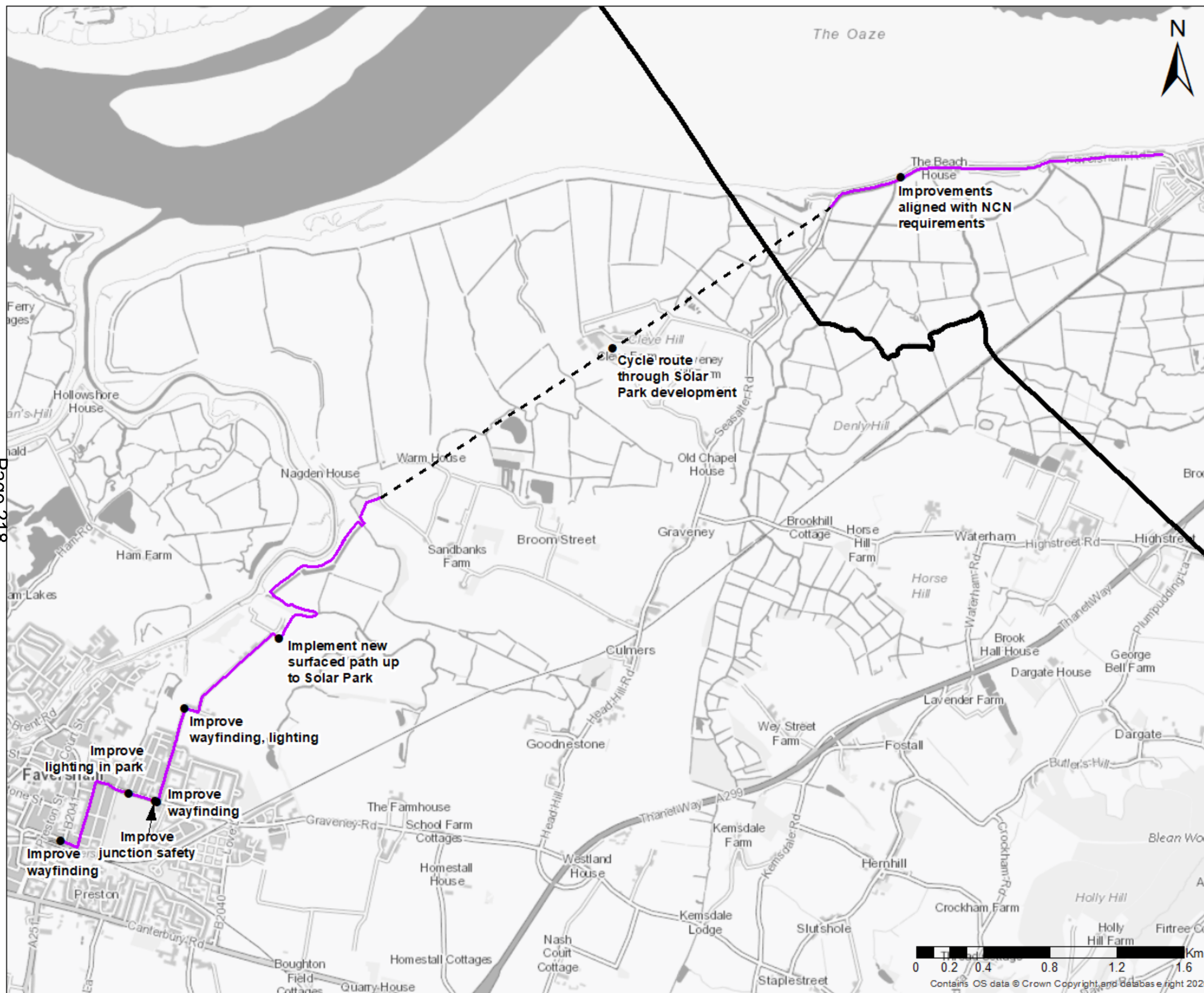
LEGEND

- Study Area
- Route 10 - Ashford to Faversham
- Cycling Interventions

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
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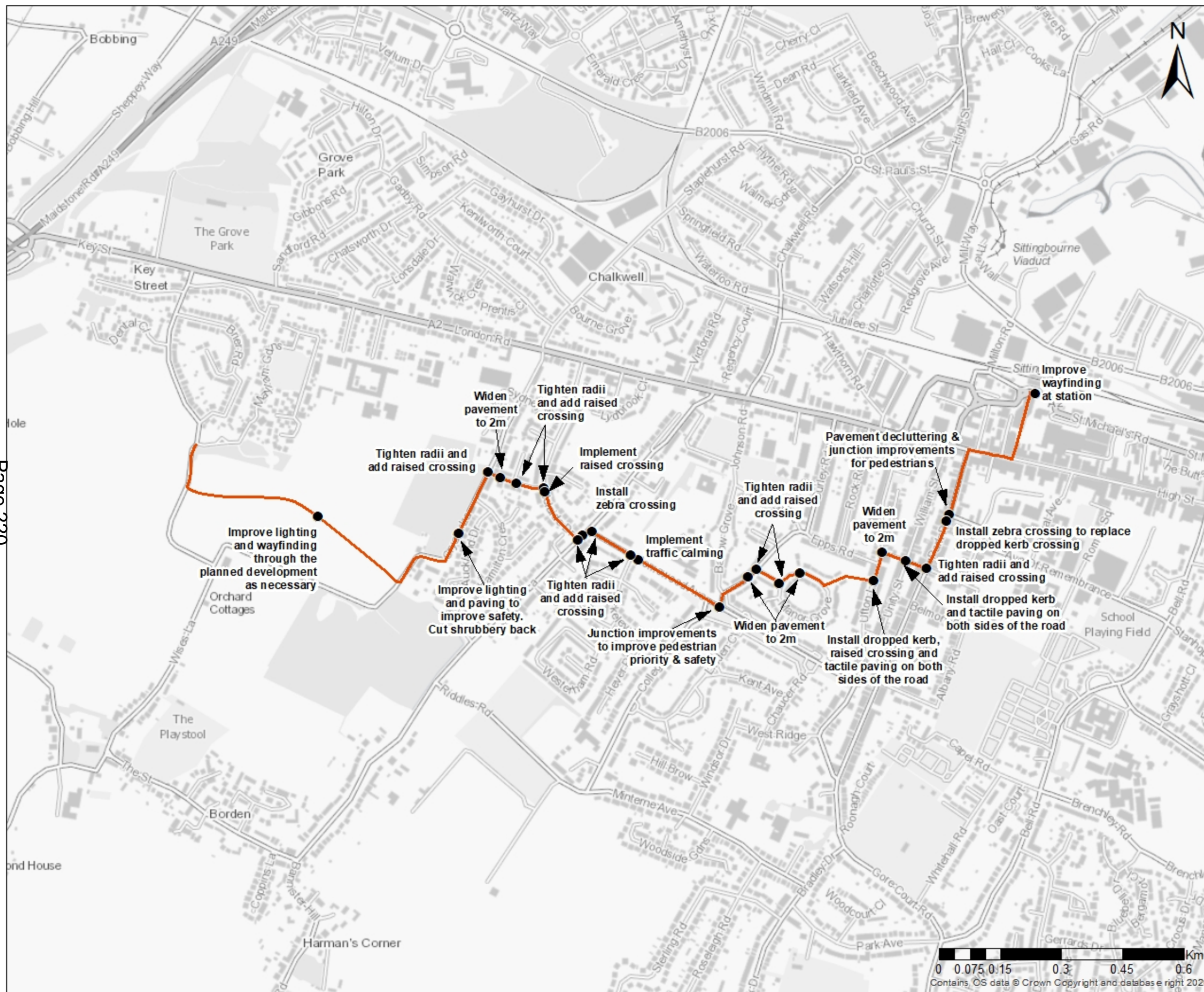
LEGEND

-  Study Area
-  Route 11 - Faversham to Whitstable
-  Route 11 - Faversham to Whitstable (alignment TBC)
-  Cycling Interventions

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Appendix E - Sittingbourne Walking and Wheeling Routes and Interventions



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LEGEND

- Study Area
- Route 2 - Sittingbourne Station to SW Developments
- Walking Interventions

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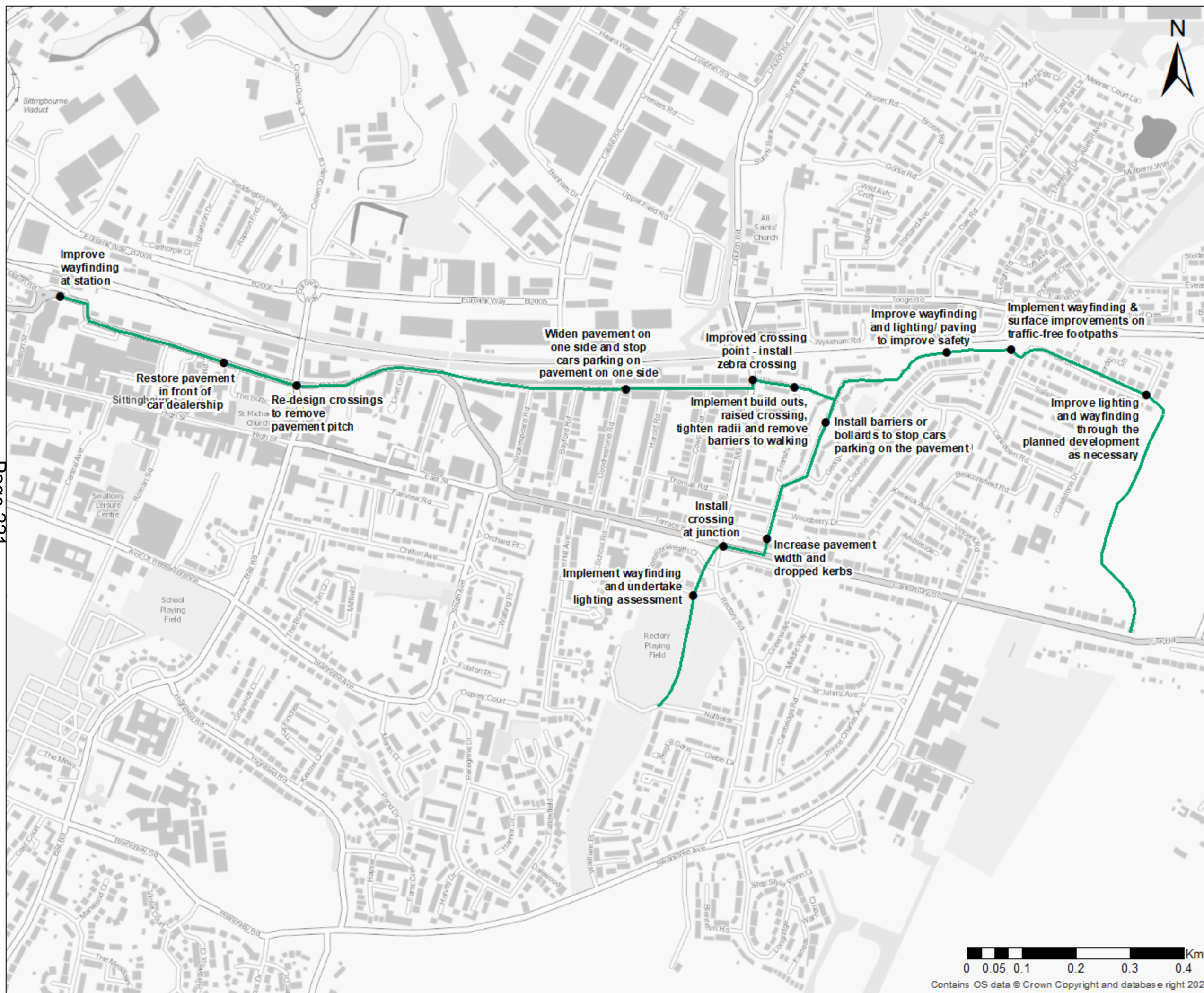
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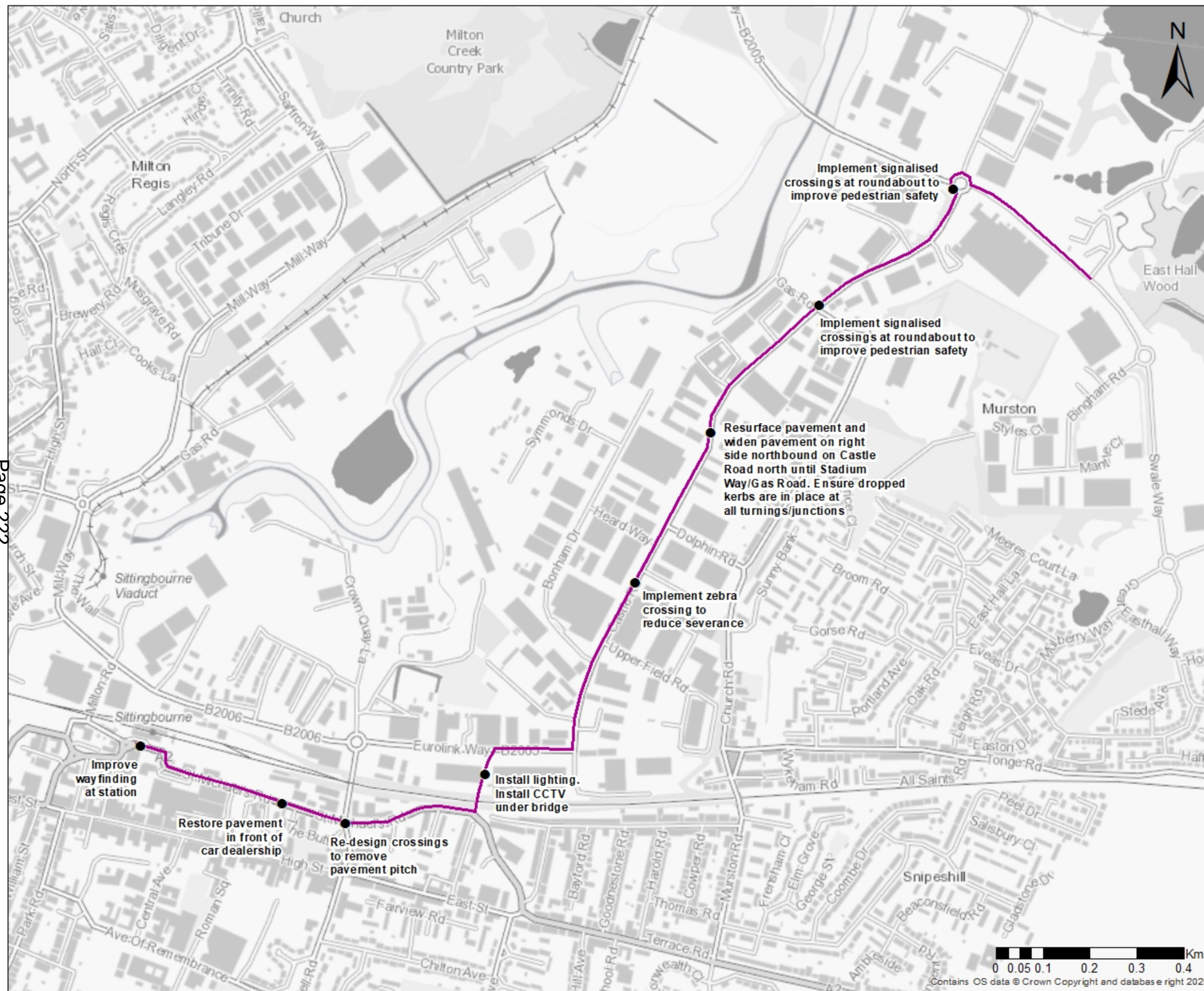
LEGEND

- Study Area
- Walking Interventions
- Route 3 - Sittingbourne Station to East Sittingbourne

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LEGEND

- Study Area
- Route 4 - Sittingbourne Station to Eurolink Business Park
- Walking Interventions

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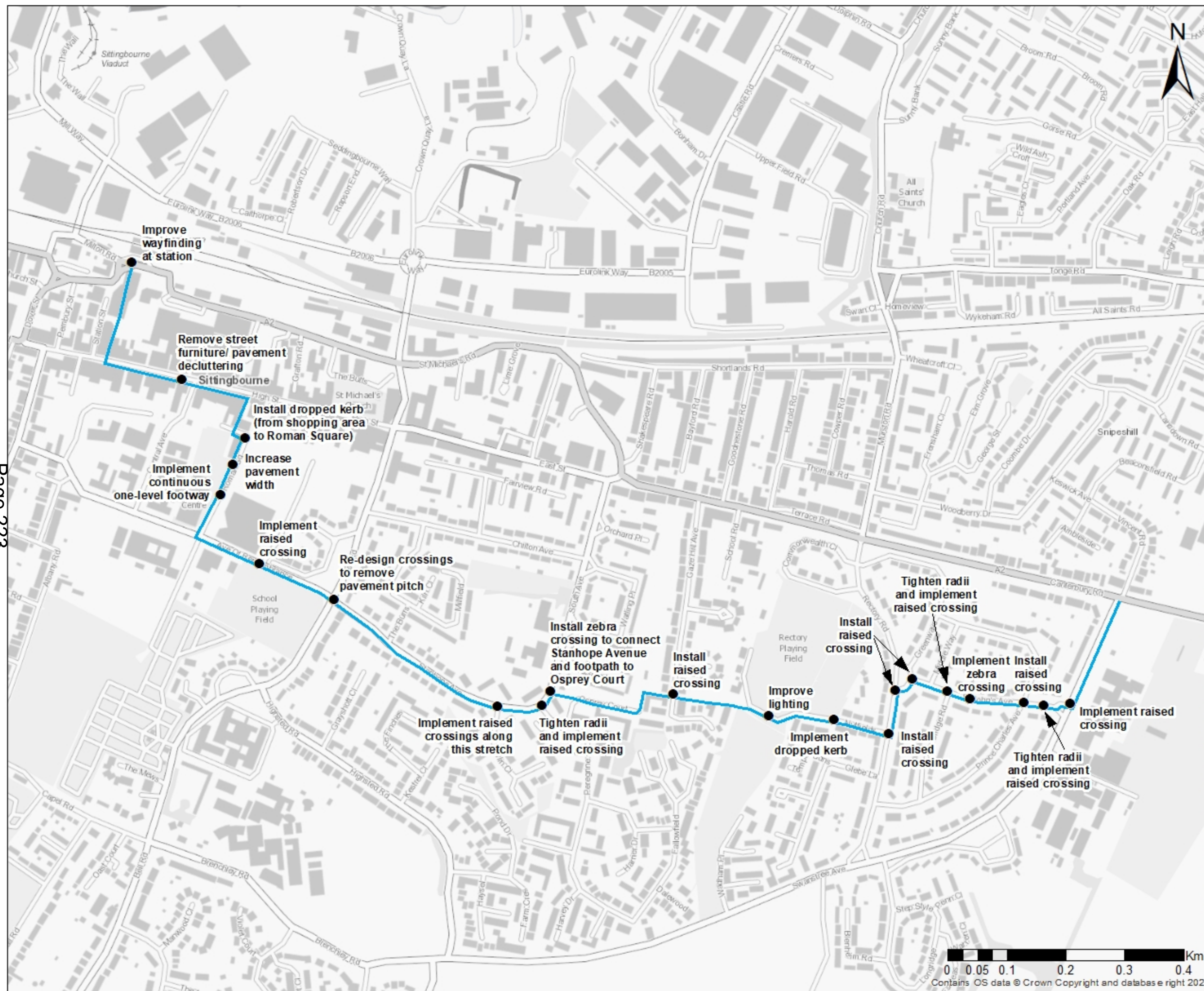
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LEGEND

- Study Area
- Route 5 - Central Sittingbourne to East Sittingbourne
- Walking Interventions

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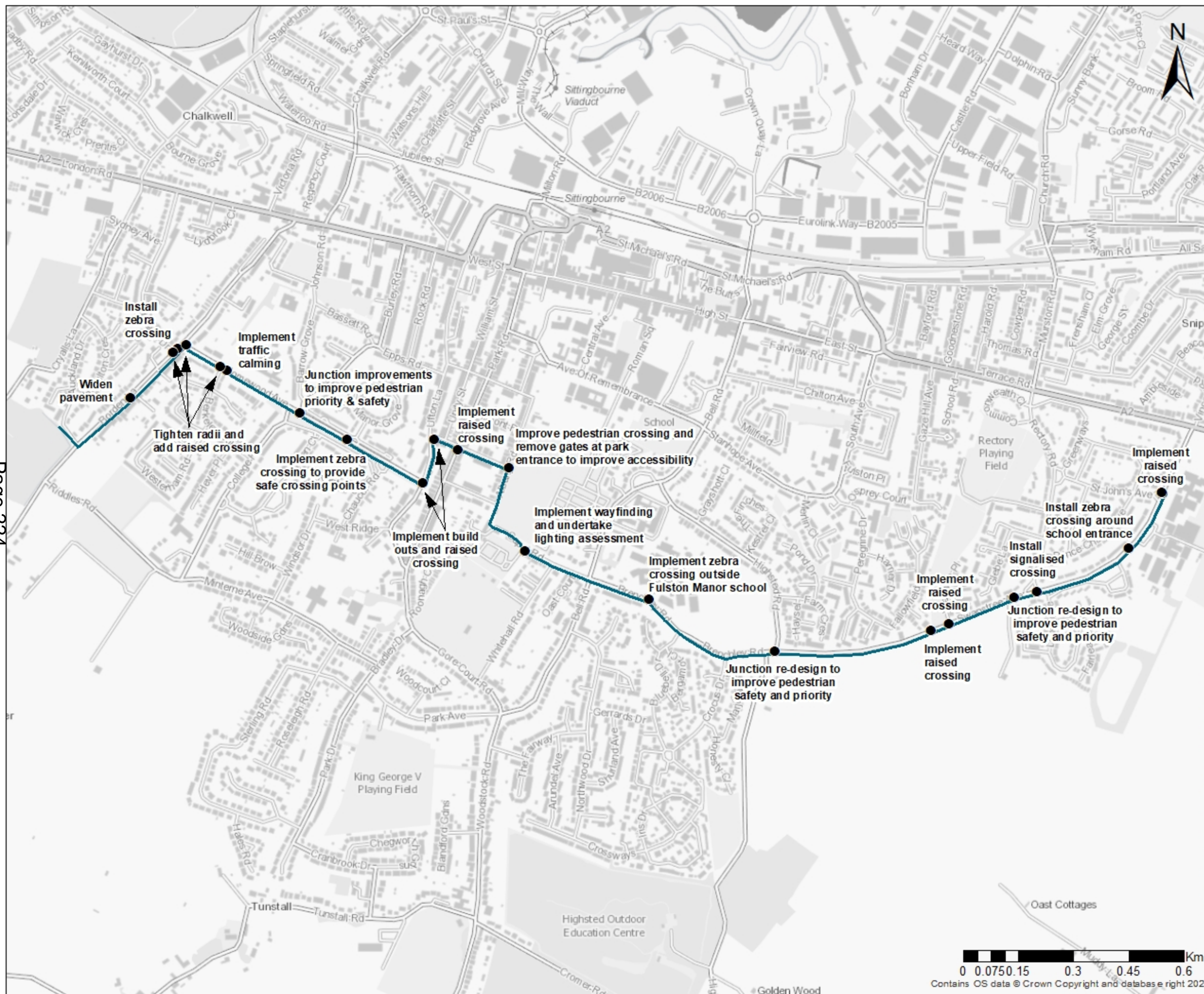
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LEGEND

- Study Area
- Route 6 - SW Developments to South Sittingbourne
- Walking Interventions



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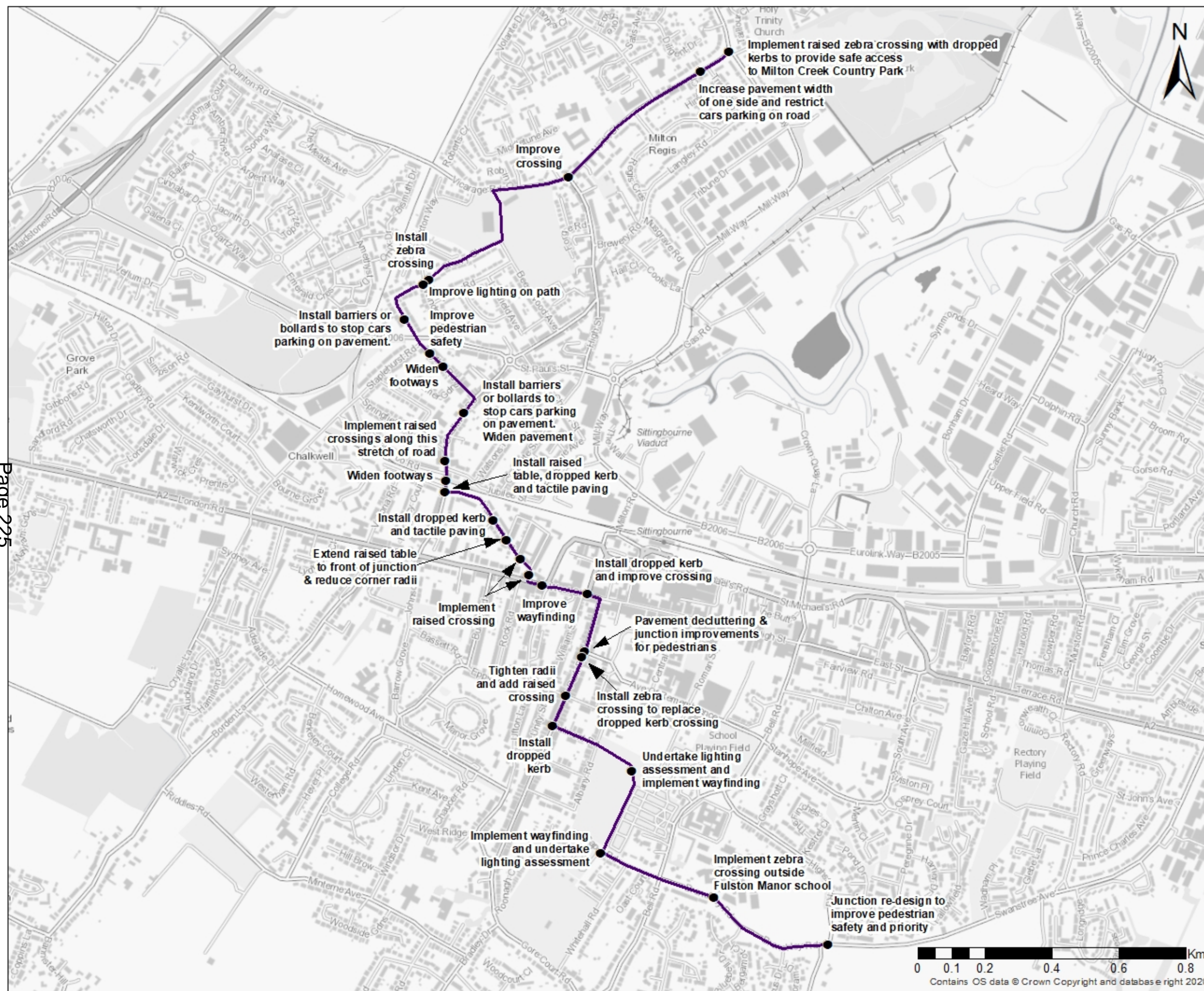
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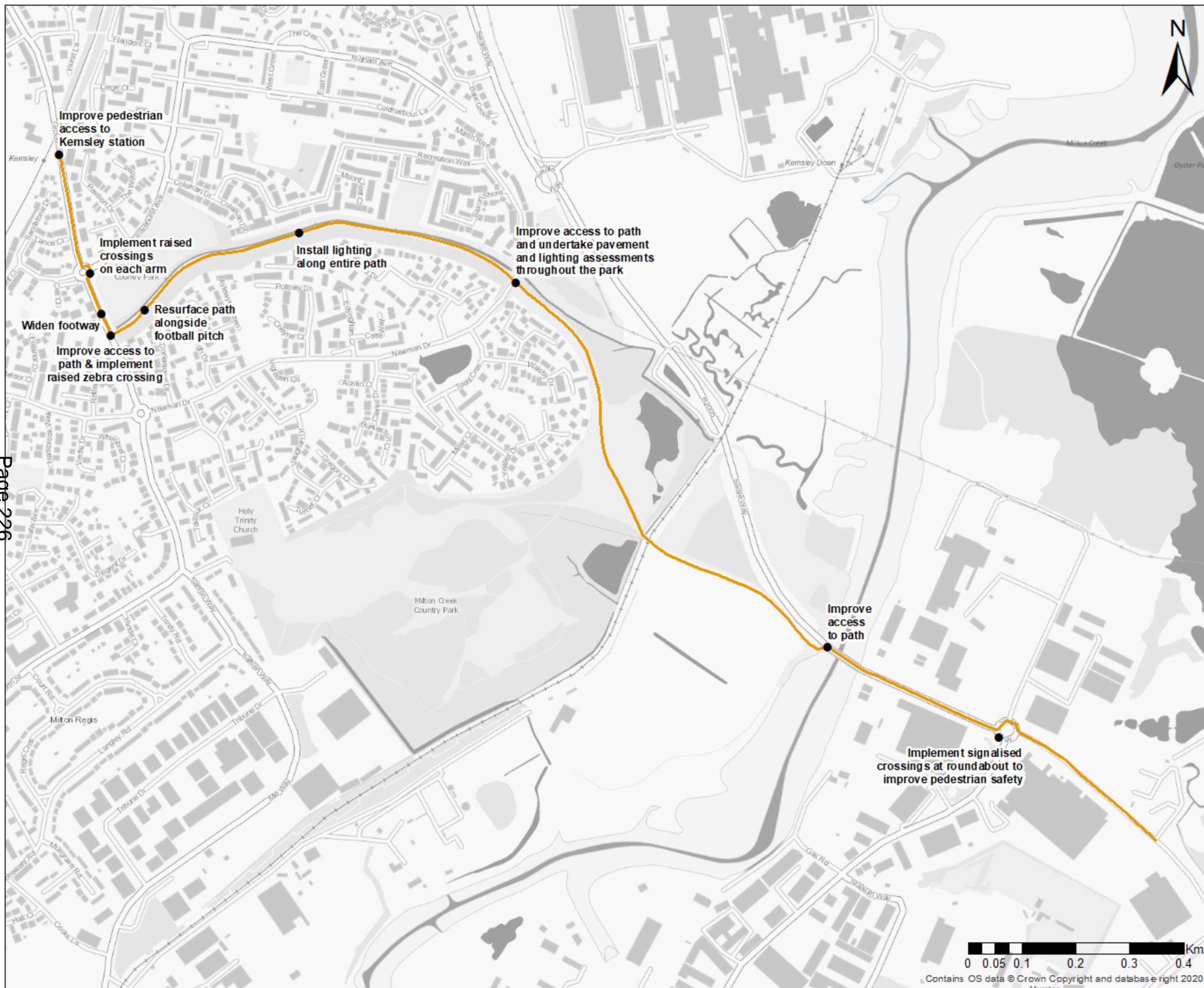
LEGEND

- Route 7 - South Sittingbourne to Milton Creek Country Park
- Walking Interventions



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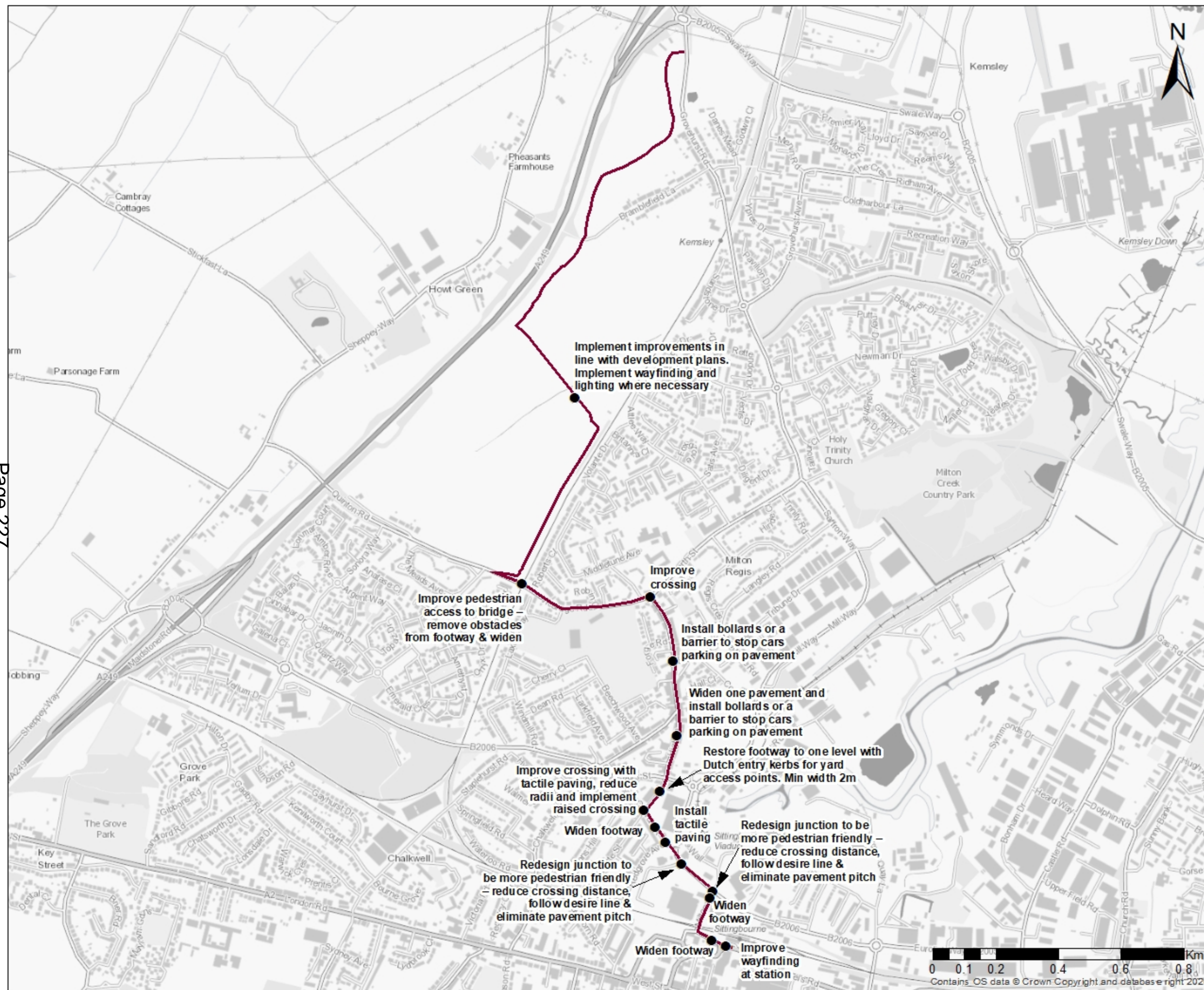
- Study Area
- Walking Interventions
- Route 8 - Kemsley to Eurolink Business Park

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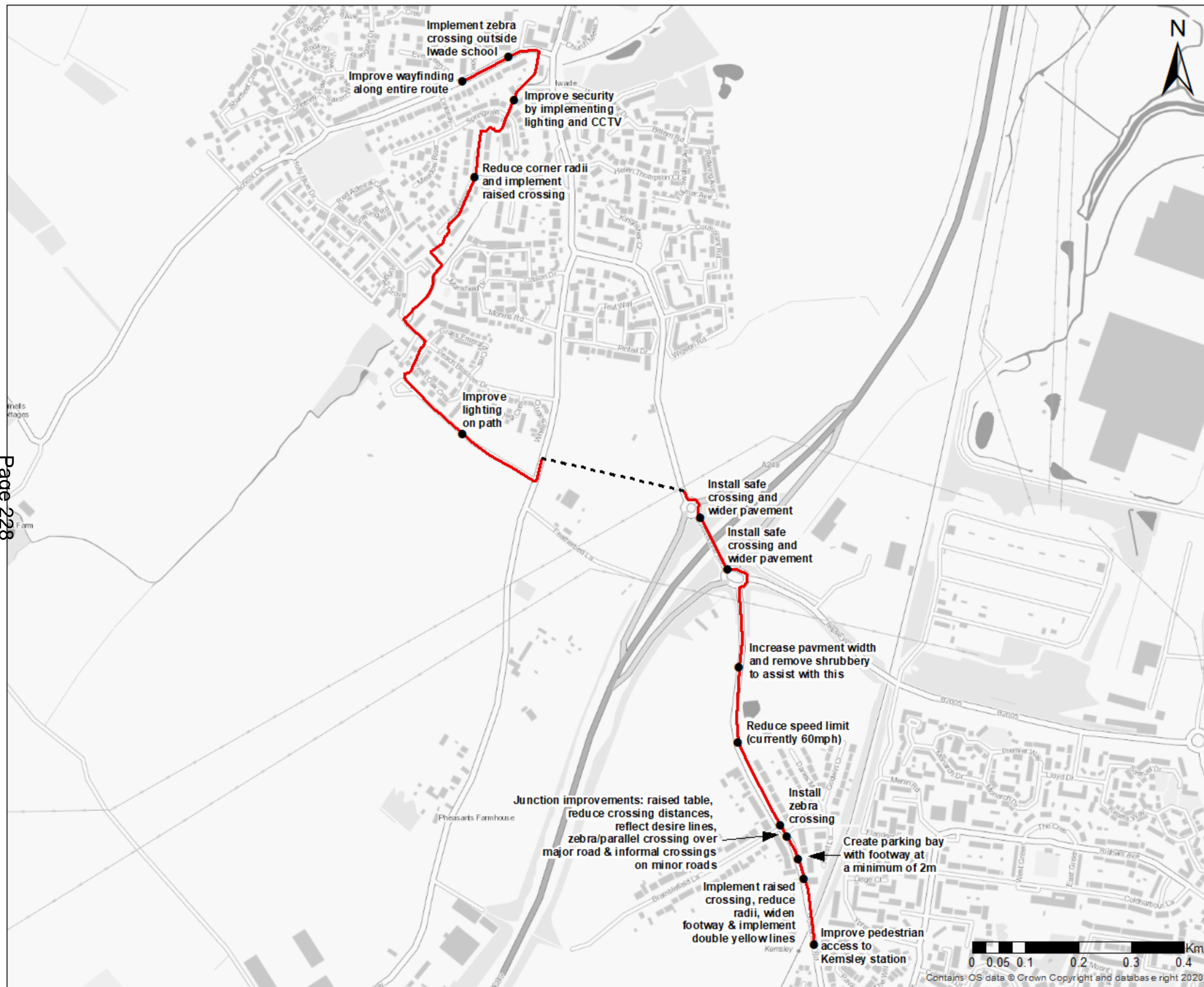
LEGEND

- Study Area
- Route 9 - NW Development to Sittingbourne Station
- Walking Interventions

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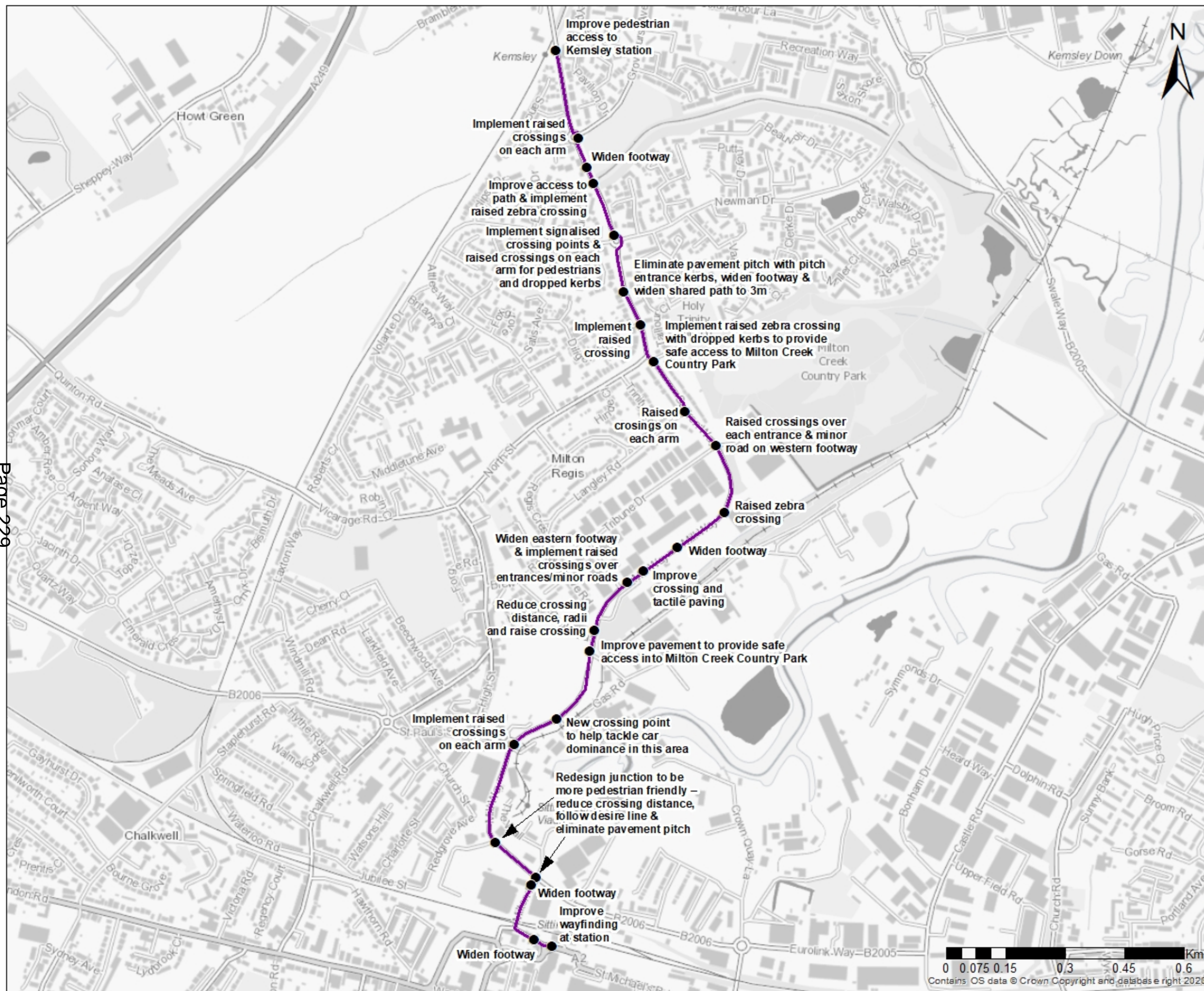
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LEGEND

- Study Area
- Walking Interventions
- Route 10 - Kemsley to Iwade
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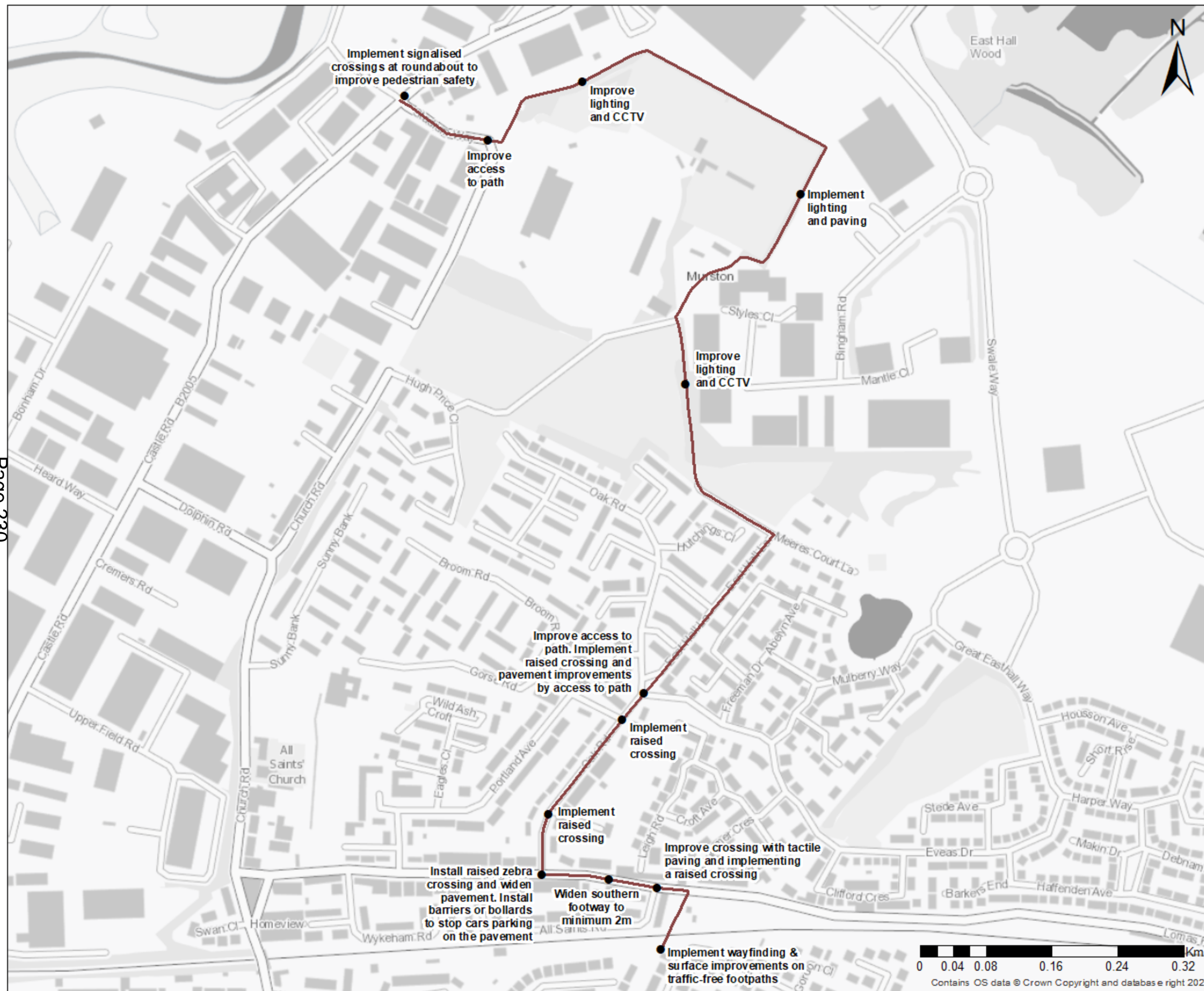
LEGEND

- Study Area
- Route 11 - Kemsley to Sittingbourne Station
- Walking Interventions

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LEGEND

- Study Area
- Walking Interventions
- Route 12 - North to South Murston

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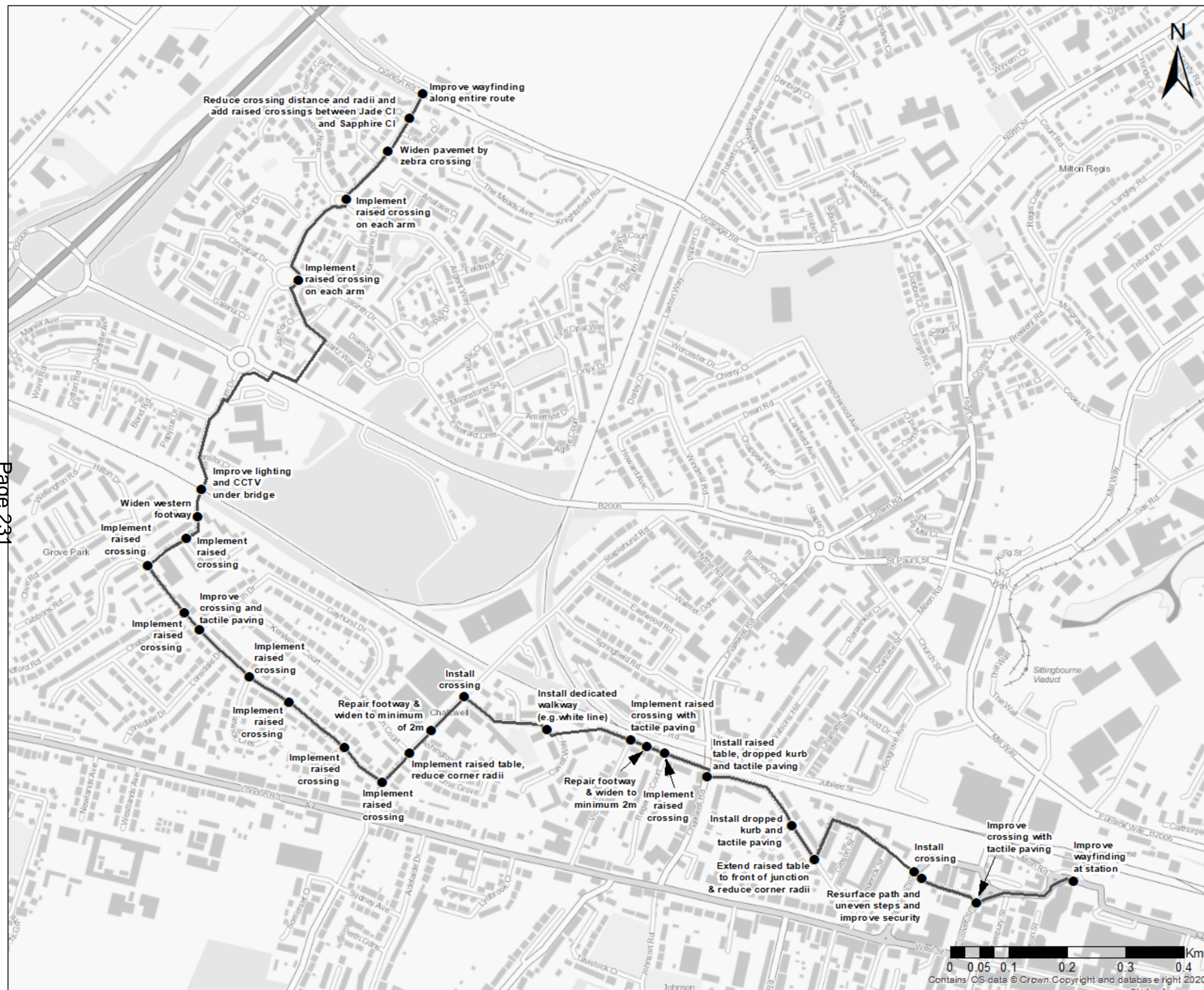
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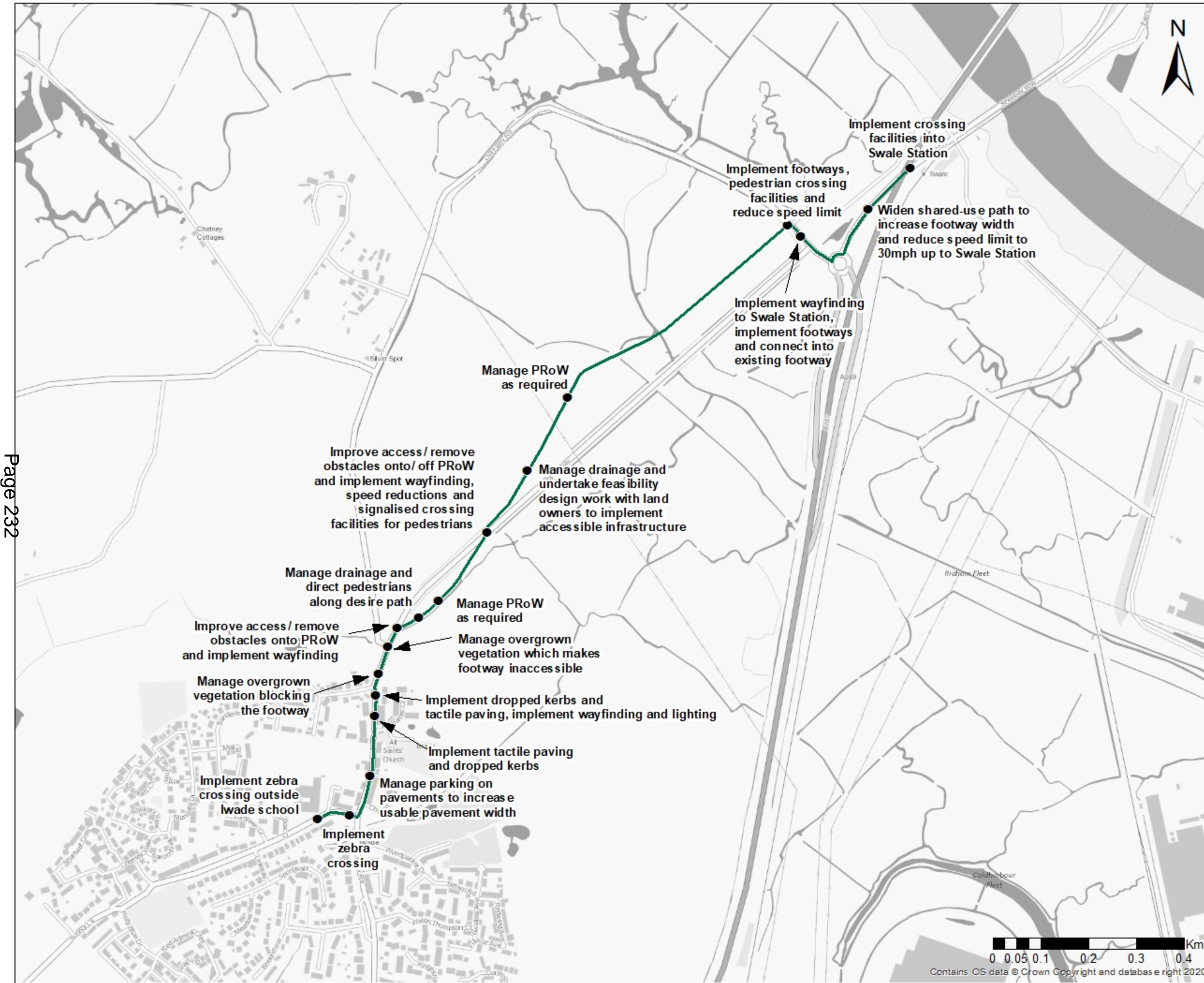
LEGEND

- Study Area
- Route 13 - West Sittingbourne
- Walking Interventions



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- Walking Interventions
- WR14 - Iwade to Swale station

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Appendix F - Isle of Sheppey Active Travel and Walking and Wheeling Routes and Interventions

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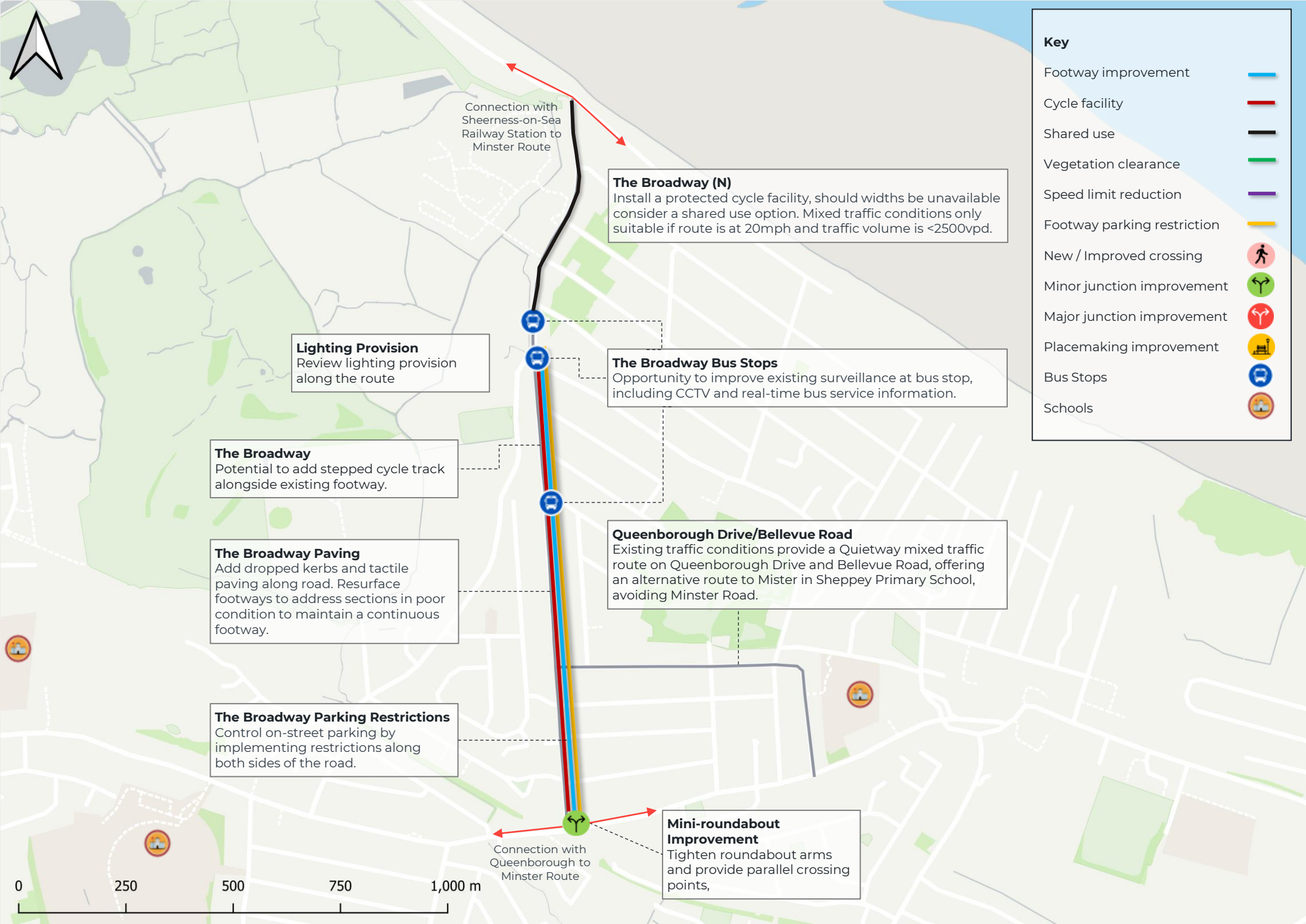


Figure 50 : The Broadway

Main Road (B2007) to Minster Road

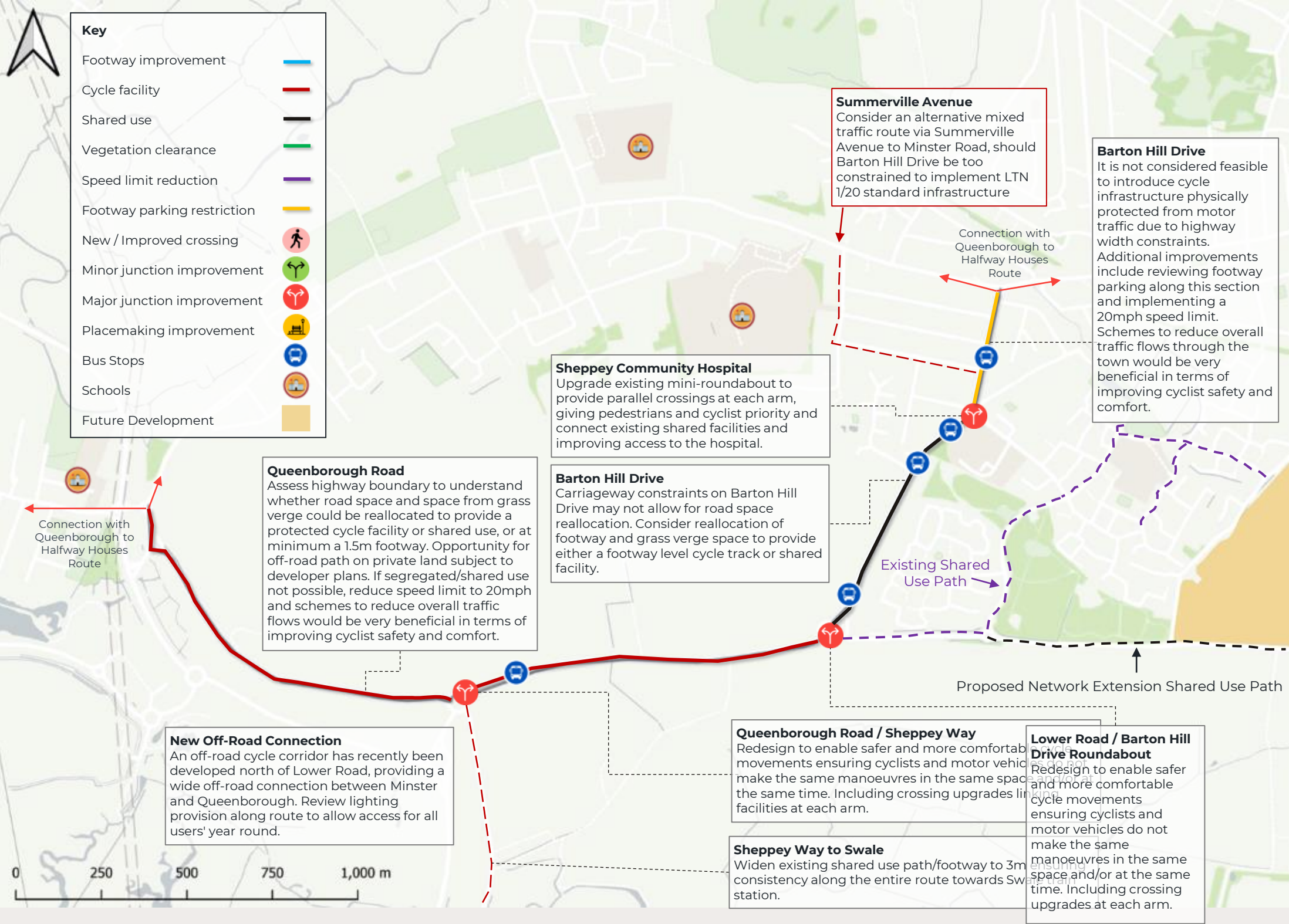


Figure 51 : Main Road (B2007) to Minster Road

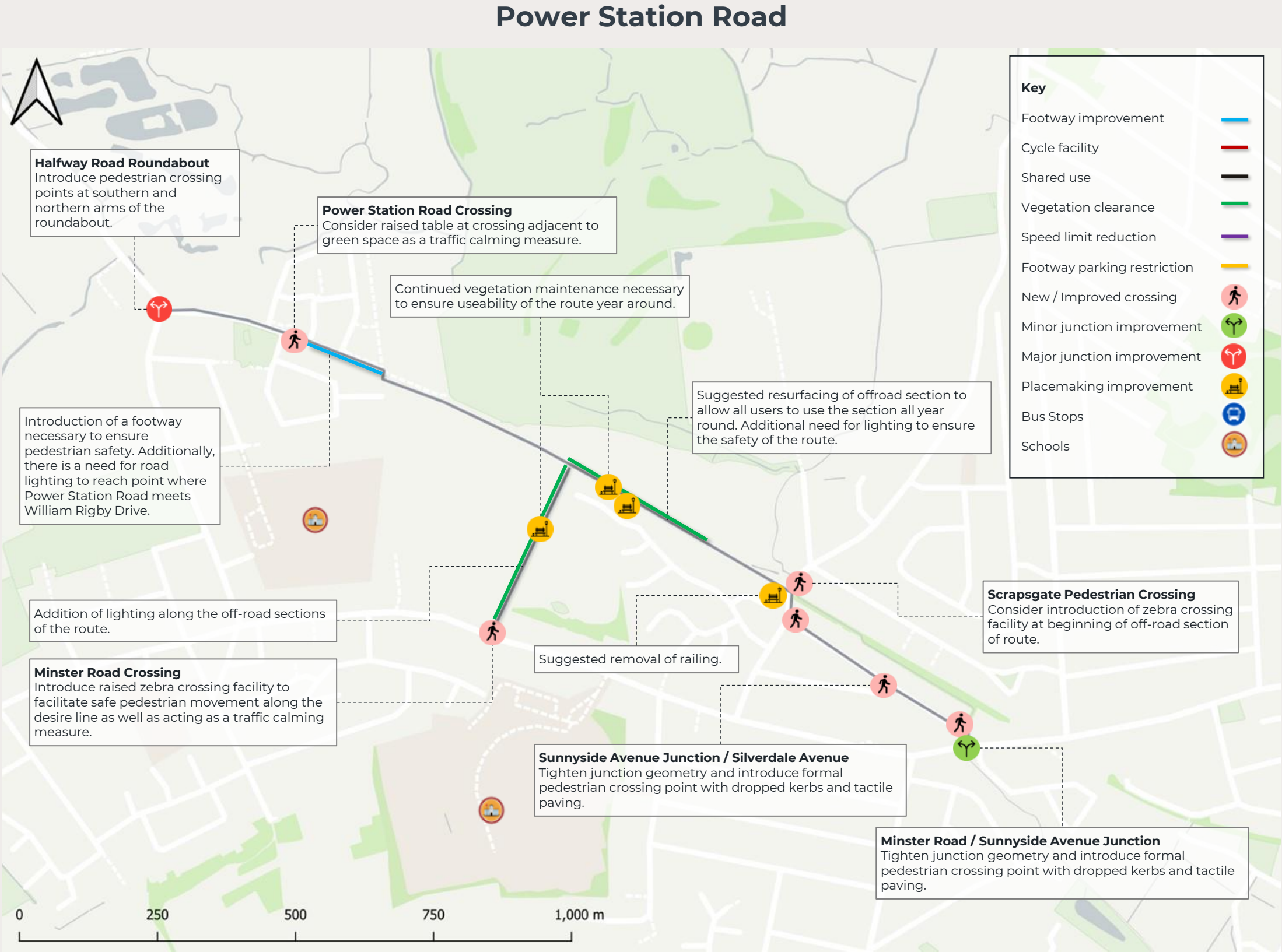


Figure 52 : Power Station Road

Brielle Way to Rushenden Road

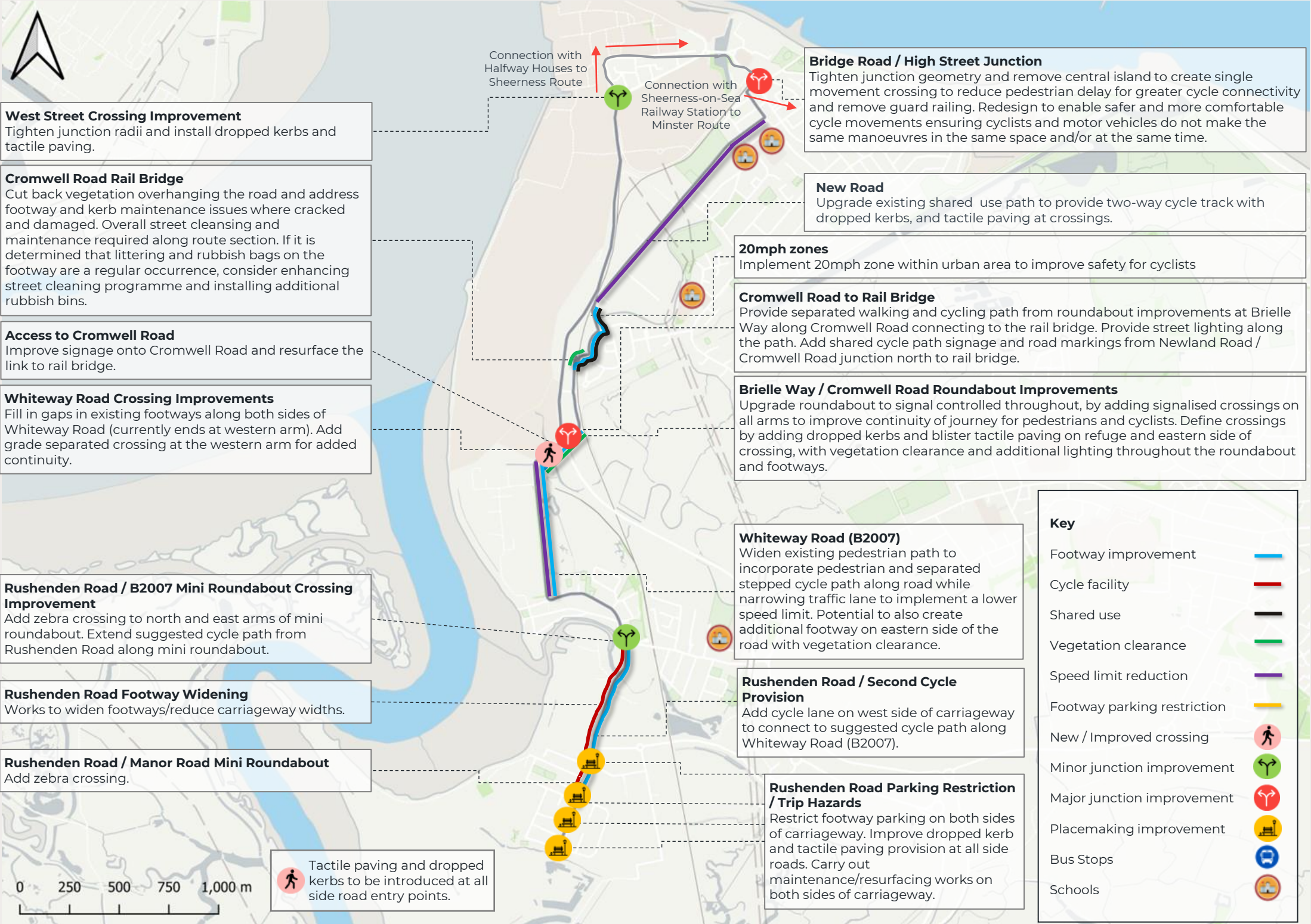


Figure 53 : Brille Way to Rushenden Road

Sheerness-on-Sea Railway Station to Minster

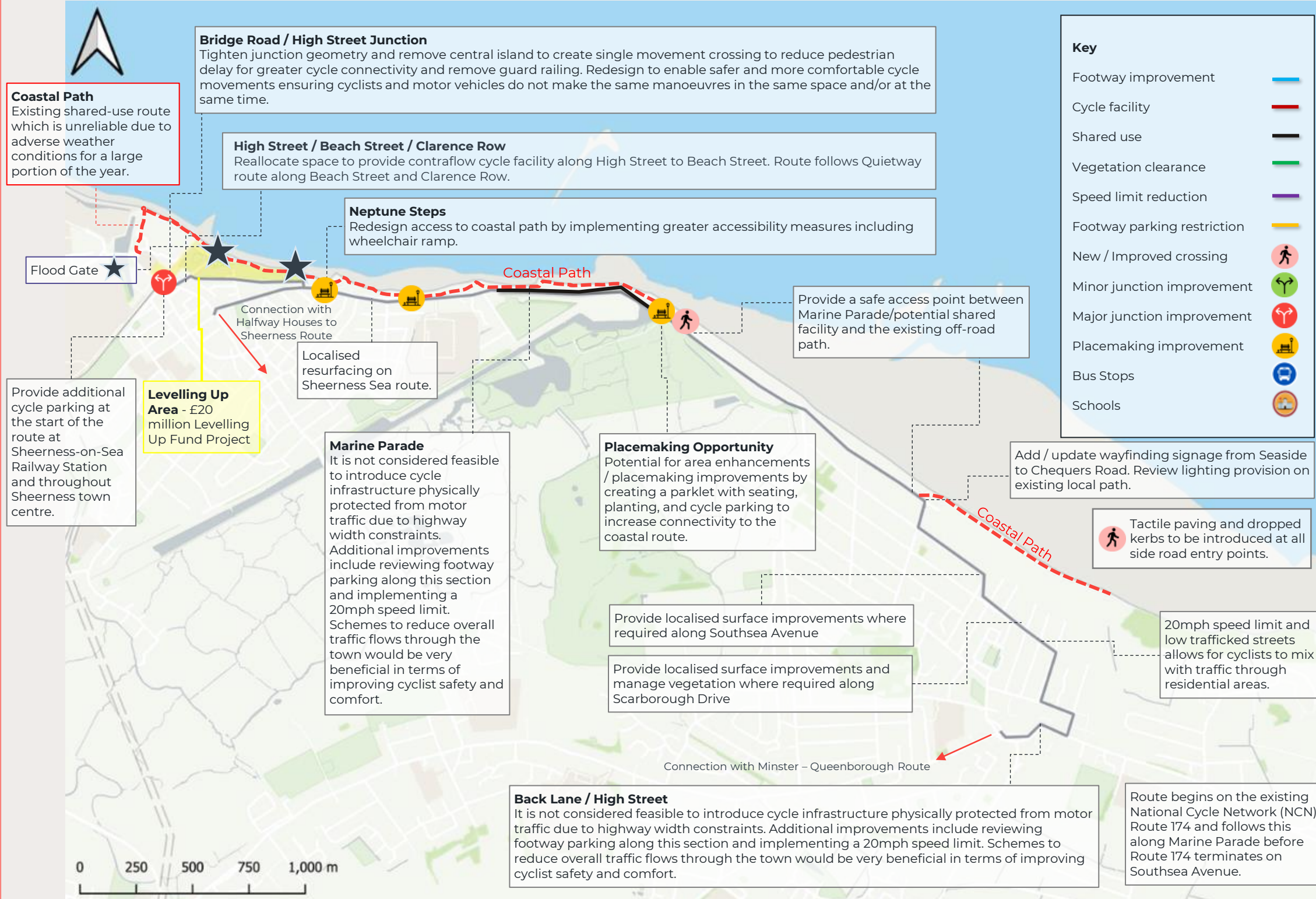


Figure 54 : Sheerness-on-Sea Railway Station to Minster

Queenborough to Minster



Figure 55: Queenborough to Minster

Halfway Houses to Sheerness

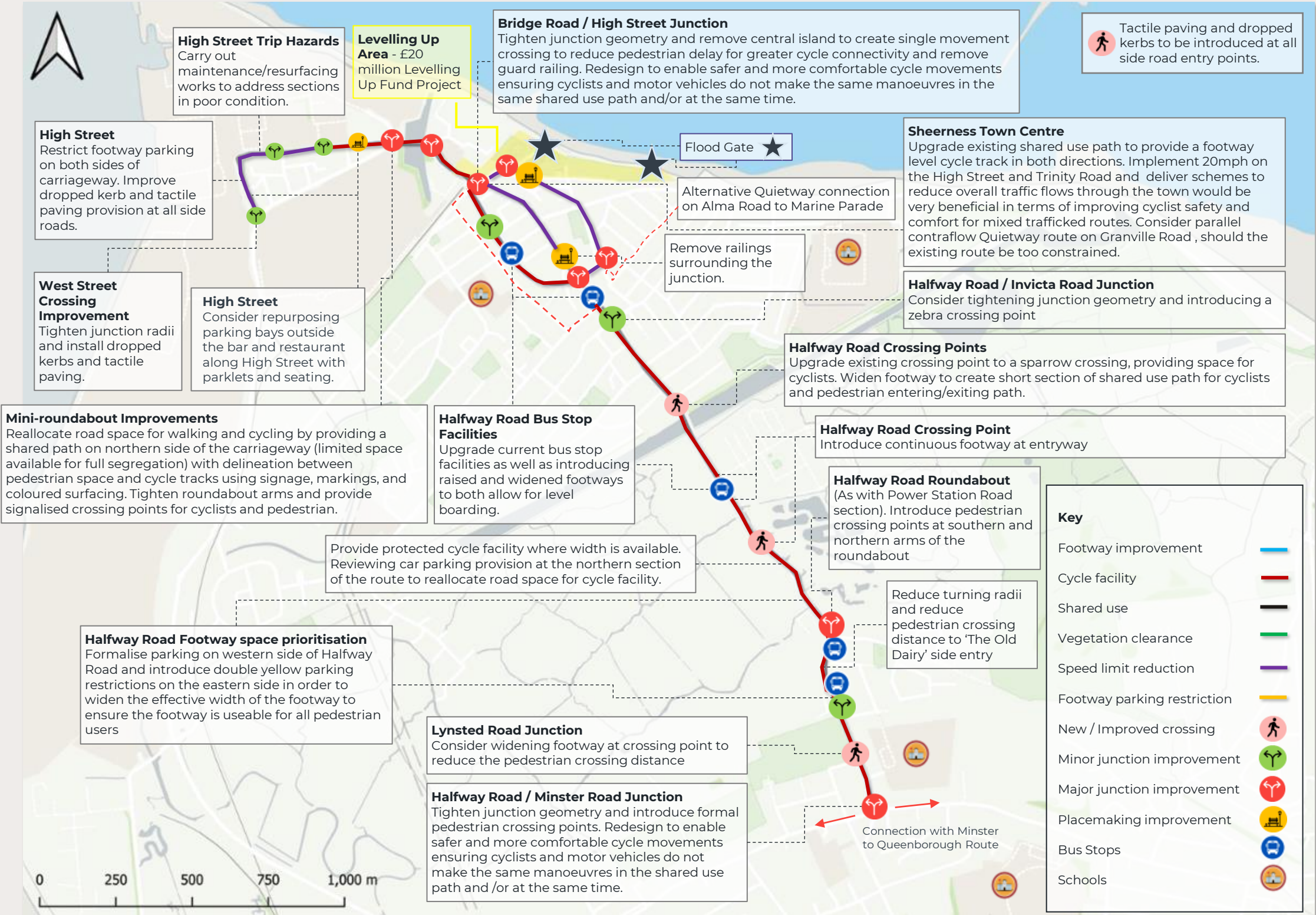


Figure 56 : Halfway Houses to Sheerness

Cromwell Road to Marine Parade

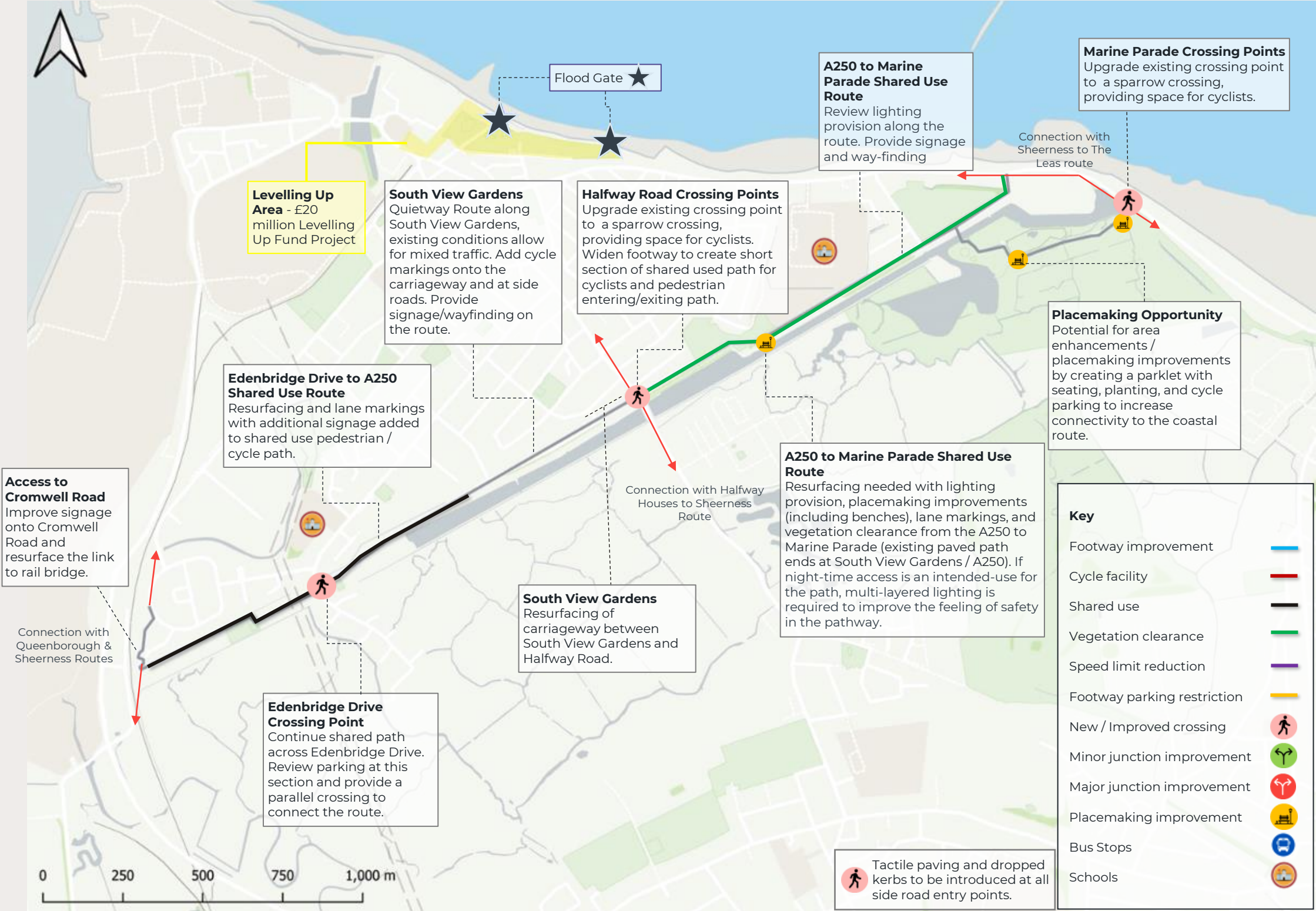


Figure 57 : Cromwell Road to Marine Parade

Swale Railway Station to Queenborough Road (A2500)

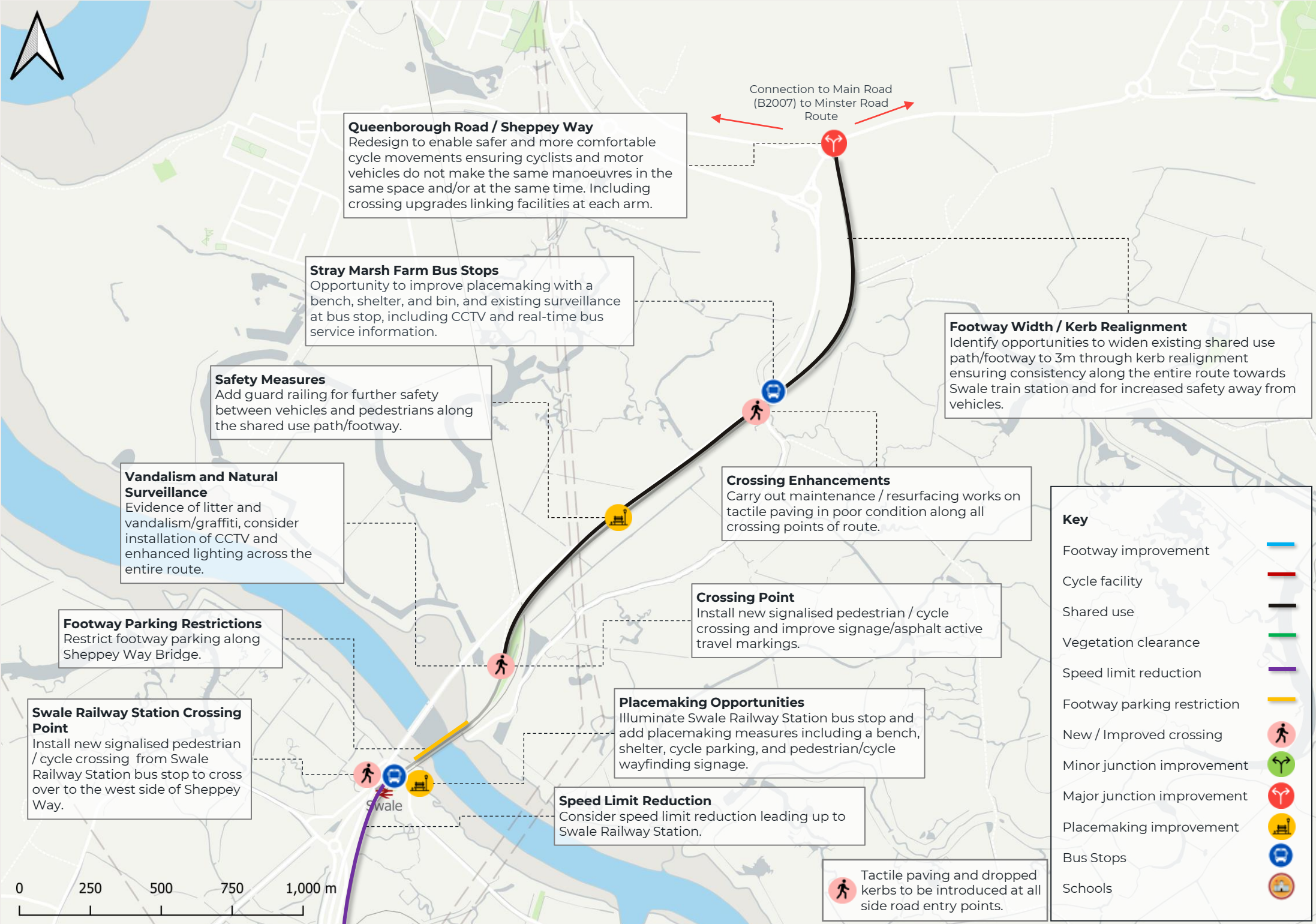
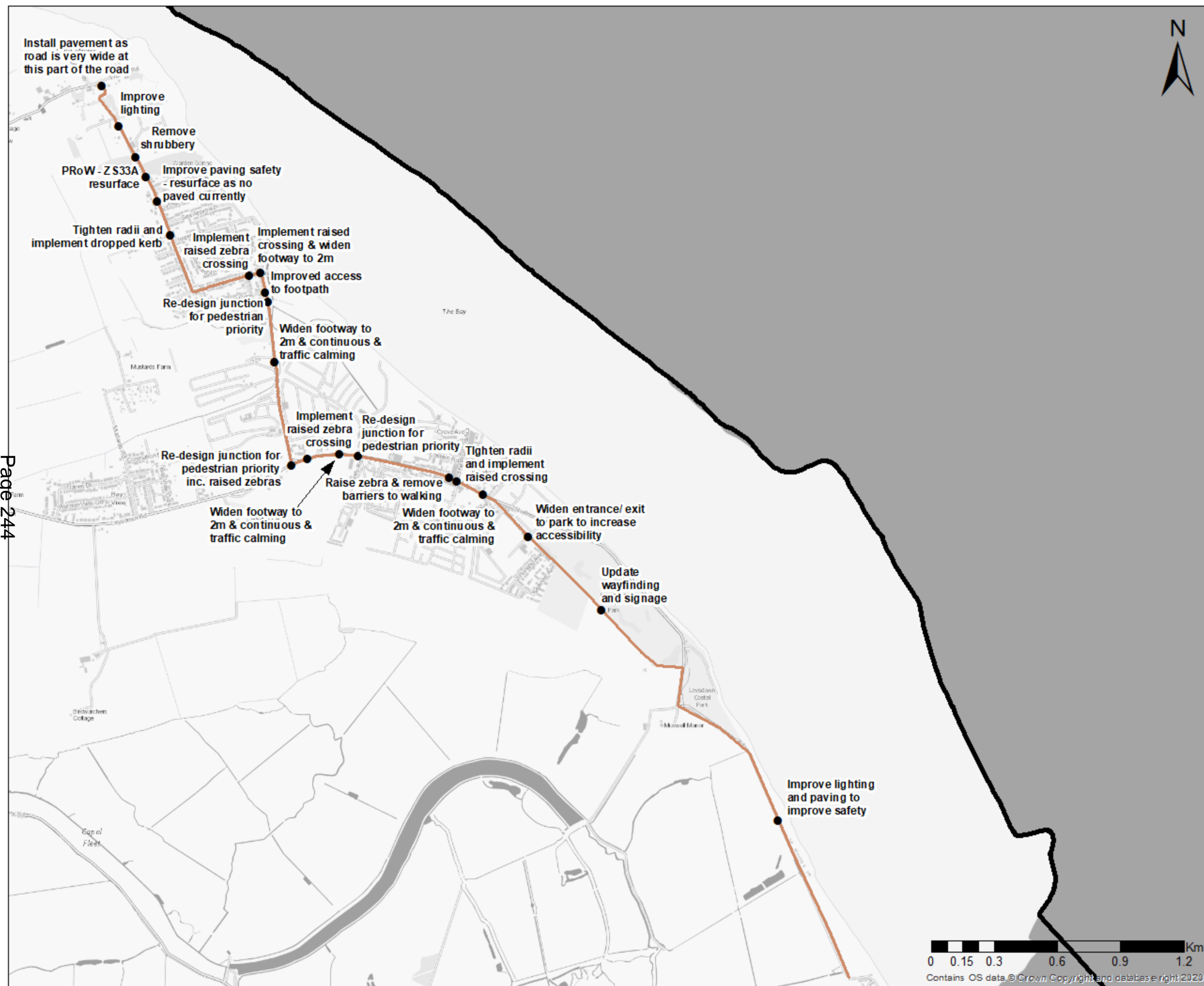


Figure 58 : Swale Railway Station to Queenborough Road (A2500)

Sheerness Town Centre







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Environmental Services and Climate Change Committee	
Meeting Date	10 July 2025
Report Title	Revocation of Air Quality Management Areas in East Street (AQMA 3) and Teynham (AQMA 5) due to air quality improvements and recommendations from Defra
EMT Lead	Lisa Fillery, Director of Resource
Head of Service	Duncan Haynes, Mid Kent Environmental Health Manager
Lead Officer	Clare Lydon, Team Leader (Environmental Protection - Swale) MidKent Environmental Health Shared Service
Classification	Open
Recommendations	1. That the Environmental Services and Climate Change Committee approves the revocation of AQMA 3 and AQMA 5.

1 Purpose of Report and Executive Summary

- 1.1. This report reviews the Councils air quality data and advice provided by Defra in the last three Annual Status Reports (2022, 2023 and 2024) and data prepared for the 2025 ASR relating to Air Quality Management Areas (AQMAs) 3 (East Street) and 5 (Teynham). Consideration is given to statutory guidance provided in Defra's Local Air Quality Management, Technical and Policy Guidance (2022).
- 1.2. Annual mean concentrations of nitrogen dioxide (NO₂) at these two Air Quality Management Areas (AQMA) have been consistently below the government Air Quality Objective (AQO). The Annual Status Report (ASR) 2024 showed East Street (AQMA 3) was compliant for five consecutive years and Teynham (AQMA 5) has been compliant for the past six consecutive years. Defra have expressly indicated to Swale that both AQMAs should begin the process of revocation in feedback of the 2022, 2023 and 2024 Annual Status Reports (ASRs).
- 1.3. Additional data collected and prepared for the ASR 2025 also show:
 - East Street (AQMA 3) has now been compliant for six consecutive years with one of those years within 10% of the annual mean NO₂ concentration objective.
 - Teynham (AQMA 5) has now been compliant the last seven consecutive years, with one of the years being within 10% of the annual mean NO₂ concentration objective.

- 1.4. A report was taken to committee on the 13th of March 2024 where members voted against the revocation of both AQMAs. Since then, we have monitored NO₂ concentrations for another year in addition to having additional data from the 2024 ASR (2023 data). Both sets of results strengthen the decision to revoke both AQMAs, as concentrations have continued to decrease (see background papers).
- 1.5. Swale's Air Quality Management document is attached to this report (appendix 1) which explains what the Council should do when levels of air quality are shown to have become compliant with the National Air Quality Objective and it outlines the risks associated with not revoking AQMAs.
- 1.6. As outlined in the Air Quality Management document (paragraph 7.2.1), the revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective, as evidenced through monitoring. There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period. Defra will not appraise Air Quality Action Plan's (AQAPs) that have AQMAs compliant for five years unless a likely exceedance has been identified in the area (paragraph: 7.2.3).
- 1.7. Swale Borough Council currently has one Strategic Air Quality Action Plan (2023 -2028) covering all AQMAs in the district. Therefore, keeping an AQMA in place when it should be revoked risks Defra not accepting the AQAP in the future or if another AQMA is declared. For example, if any monitoring results identify new areas where the Air Quality Objectives (target levels) are not being met, we would not be able to create an action plan or update the current one for these areas, due to not revoking the AQMAs that are now in compliance. Subsequently we would be in breach of the legislation because we do not have an action plan for areas that should have one.
- 1.8. To ensure that any decisions are made on robust evidence, Swale Borough Council commissioned Ricardo, a company with worldwide reputation and expertise in air quality, to carry out a Detailed Assessment of NO₂ concentrations in these AQMAs (appendix 2). They were asked to consider the future committed developments that could impact air quality in these areas. As the declaration of the AQMAs relates to NO₂ this was the pollutant considered in the report.
- 1.9. The Detailed Assessment quantified the public exposure to concentrations of NO₂ across East Street, Sittingbourne and Teynham. The study assessed the years 2022 and 2028 and considered the impact of future committed developments, that could adversely impact concentrations of NO₂ in the AQMAs. A sensitivity test was also completed, to address possible fleet renewal delays in Swale relative to national projections. The assessment was robust in determining future compliance.

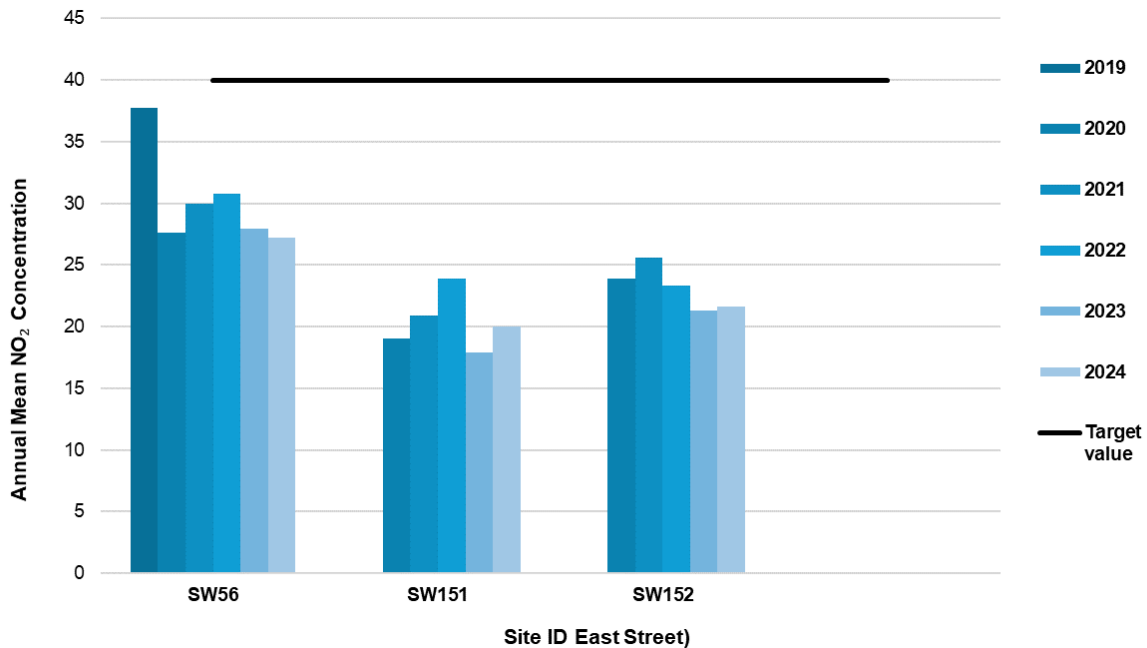
- 1.10. The Detailed Assessment demonstrates that Air Quality Objectives are being met and will continue to do so. The modelling results in the Detailed Assessment indicate the AQMAs in Teynham and East Street Sittingbourne can be revoked without risk of future exceedances for NO₂. The final conclusions of the assessment, provides confidence that the improvements will be sustained.
- 1.11. Any revoked AQMAs will still be considered an air quality sensitive area and will be monitored, remaining under scrutiny within the Councils Annual Status Reports to ensure deterioration in condition does not occur. If the two AQMAs are revoked the AQAP will be amended to this affect.

2. Background

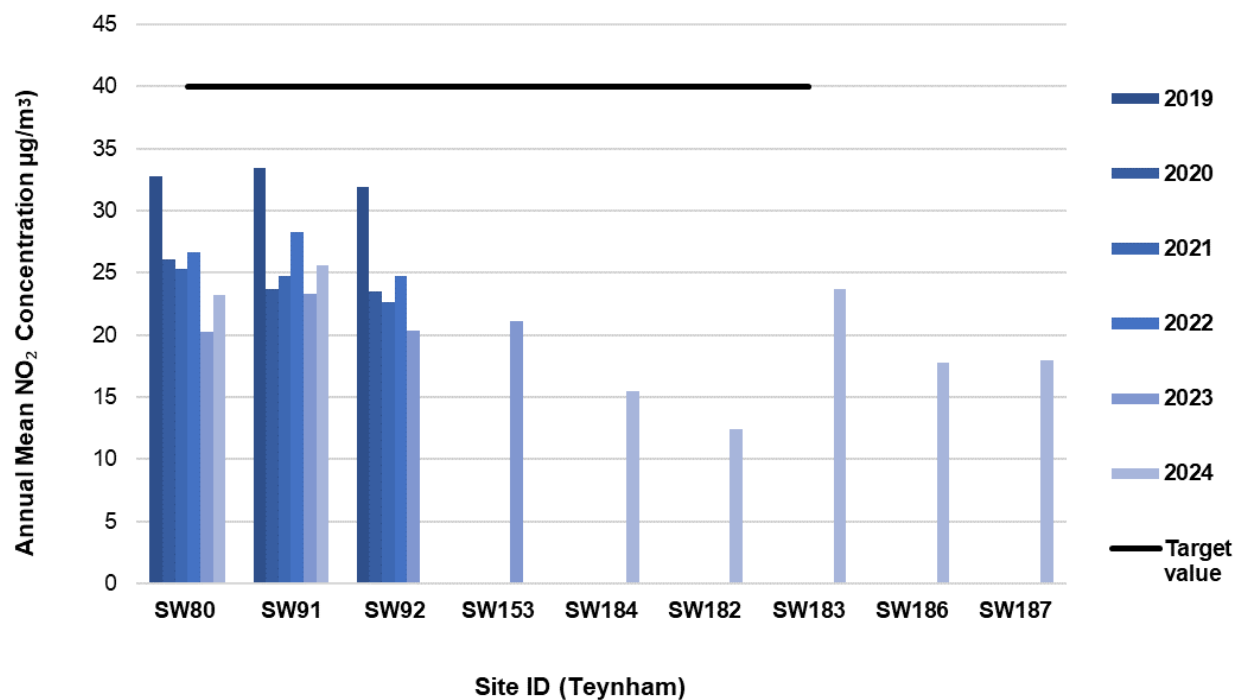
- 2.1. Swale Borough Council has a statutory duty under Part IV, Section 83 (1) of the Environment Act 1995, as amended by the Environment Act 2021, to review and assess air quality and take the necessary actions to improve areas of poor air quality. If the UK government Air Quality Objective for key pollutants are exceeded where people are likely to be regularly present, an AQMA must be declared.
- 2.2. Previous monitoring identified six locations that exceeded the annual Air Quality Objective for NO₂ with six AQMAs having been declared. These are AQMA 1 (Newington), 2/6 (Ospringe), 3 (East Street), 4 (St Paul's Street), 5 (Teynham) and 7 located along Keycol Hill.
- 2.3. The Council has an extensive air quality monitoring network providing data on NO₂ and particulate matter (PM₁₀ and PM_{2.5}) pollutant concentrations. The data is recorded, collated, and reported annually in the Council's Air Quality Annual Status Report submitted to the Department for Environment Food and Rural Affairs (Defra) for approval prior to publication.
- 2.4. The Annual Status Report (ASR) provides an opportunity to analyse bias adjusted and ratified data collected over the year and compare with the previous five years of data. The ASR 2024 (see background papers) reported on five years of data from 2023 (2023, 2022, 2021, 2020, 2019). The over-all five-year trend is one of improving air quality across all AQMAs, with an overall decrease in NO₂ concentrations since 2018 for AQMA 3 and 5 (see background papers).
- 2.5. Figures 1 and 2 below shows the annual mean NO₂ concentration for both East Street and Teynham from data collected from the ASR 2024 and data prepared for the ASR 2025 and the results show:
 - East Street (AQMA 3) shown in figure 1 has been compliant for **six consecutive years** with one of those years within 10% of the annual mean NO₂ concentration objective.

- Teynham (AQMA 5) in figure 2 has been compliant the last **seven consecutive years**, with one of the years being within 10% of the annual mean NO₂ concentration objective.

2.6. Figure 1 presents NO₂ annual mean concentrations for sites SW56, SW151 and SW152 in East Street (AQMA 3) between years 2019 to 2024. There are no exceedances of the annual mean objective and there is a general trend of reduction experienced across the sites.

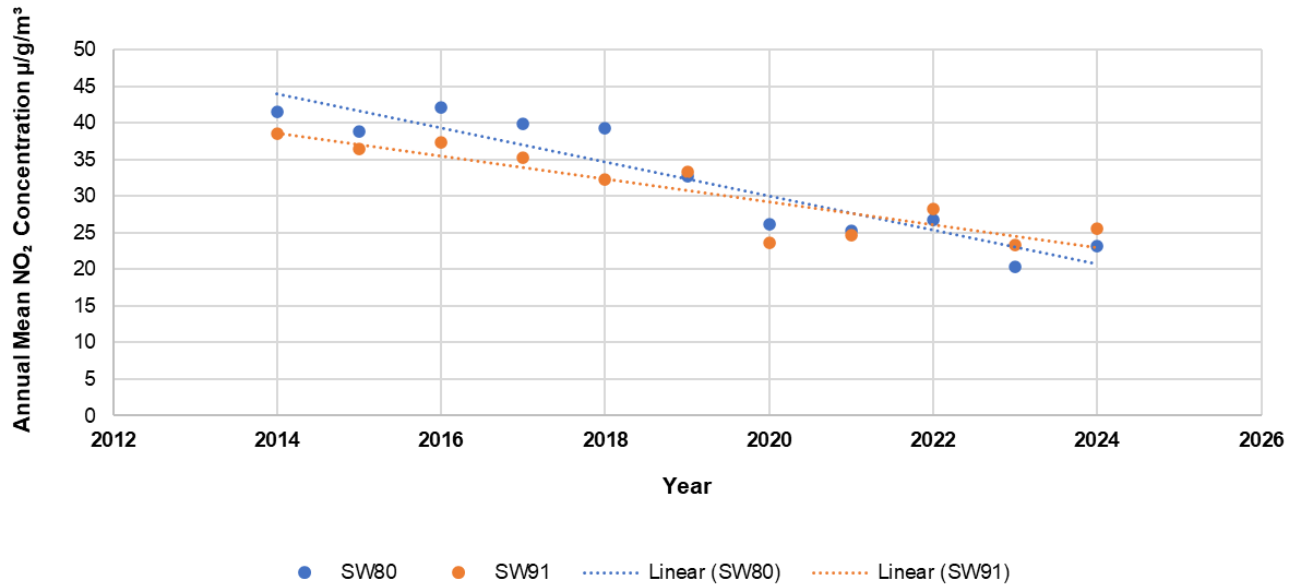


2.8. Figure 2 presents the NO₂ annual mean concentrations for sites SW80, SW91, SW92 and new 2024 sites SW153, SW184, SW182, SW183, SW186 and SW187 in Teynham and AQMA 5 between years 2019 to 2024. There are no exceedances of the annual mean objective and there is a general trend of reduction experienced across sites from previous years.

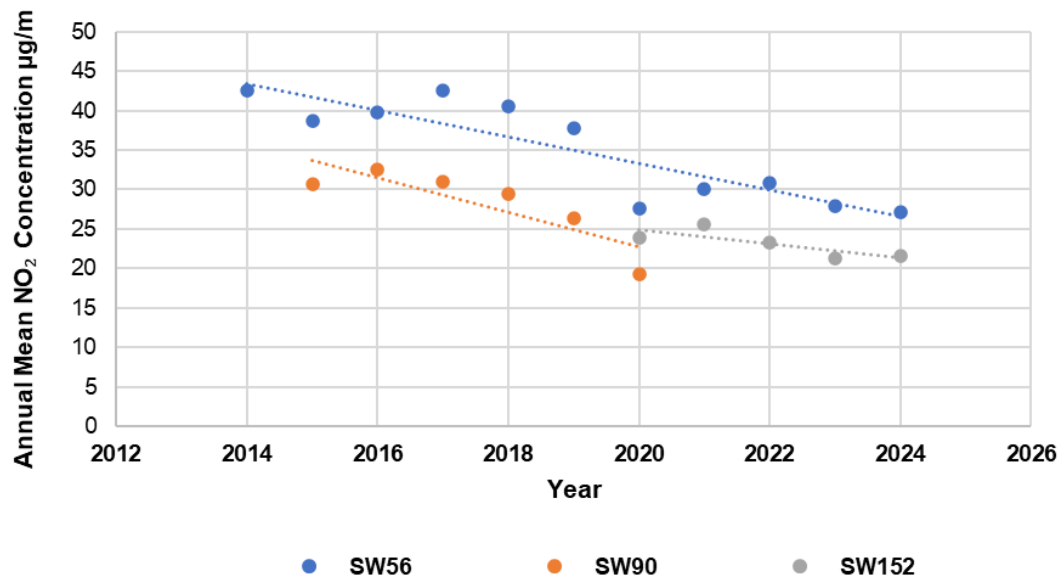


2.9. Figures 3 and 4 below shows the long-term trend the annual mean NO₂ concentration for both East Street and Teynham from 2014 to 2024. Figures 3 and 4 show a continuous decreasing trend from 2018 to 2024.

2.10. Figure 3 below shows the long-term trend in Nitrogen Dioxide concentrations in Teynham at two tube locations (SW80 and SW91) between the years 2014 and 2024.



- 2.10. Figure 4 above shows the long-term trend in Nitrogen Dioxide concentrations in East Street at three tube locations SW56, SW9 and SW152 (2020 to 2024) between the years 2014 and 2024.



- 2.7. Several factors have combined to bring about a reduction in NO₂ levels, both nationally and locally, in recent years. Perhaps the most important of these was the introduction of the Euro VI engine class in 2014. The Euro VI class represented a very significant improvement in NO_x emissions compared to the previous classes, and every year the proportion of Euro VI vehicles in the vehicle fleet increases. Other factors responsible for the reduction include a decrease in the proportion of new diesel vehicle sales, an increase in the proportion of electric vehicles and hybrid vehicles and most recently, changes in working practices originally introduced because of the COVID pandemic.
- 2.8. Defra advises the revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring.

In our most recent ASR 2024 appraisal Defra advised:

“AQMA No. 5 has been compliant for the past six years and, therefore, must be revoked”.

“AQMA No. 3 has been compliant for five years with one of those years (2019) being within 10% of the annual mean NO₂ objective. AQMA No. 3 can be considered to be revoked”.

- 2.9. The ASR appraisal stated where there have been no exceedances for the past five years, local authorities must proceed with plans to revoke the AQMA. The Local Air Quality Management Technical Guidance 2022 is clear in this respect:

"There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period." (Point 3.57, page 50)". Defra further advised that "we recognise the public perception of an AQMA being revoked might be that air pollution is no longer a problem in the area, however, keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in local air quality management."

- 2.10. In 2023, the Council commissioned Ricardo to carry out a Detailed Assessment of NO₂ concentrations in the AQMAs, and to consider the future committed developments that could impact air quality in these areas (Appendix 2).
- 2.11. The Detailed Assessment (Appendix 2) provides a review of the monitored data presented in the ASR 2023 (see background papers) and a modelled prediction of future NO₂ concentrations. The assessment sets out in detail the approach used to assess if AQMAs 3 (East Street) and 5 (Teynham) should be revoked. The assessment quantified the public exposure to concentrations of NO₂ across East Street, Sittingbourne and Teynham. The modelling reviews the baseline year of 2022, using traffic data provided by the Council, from consultants SWECO (traffic management specialists) used by Swale Planning, plus national forecasts for the vehicle fleet composition. The assessment includes a future scenario to predict traffic impacts during the year of 2028, and considers whether future committed developments may adversely impact pollutant concentrations in the AQMAs. This scenario was modelled assuming that all traffic generated by each development would run through the two AQMAs. A sensitivity test was also factored should there be a delay to fleet renewal in Swale relative to national projections for 2028.
- 2.12. The Detailed Assessment provided the following final conclusions:
- No relevant individuals within AQMA 3 and 5 are predicted to be exposed to an annual mean NO₂ concentration above or within 10% of the Air Quality Objective for annual mean NO₂.
 - The Sittingbourne, East Street and Teynham AQMAs will continue to be below 10% of the Air Quality Objective for annual mean NO₂ at all locations of relevant exposure in the modelled 2028 scenario.
 - The model results therefore indicate the AQMAs can be revoked without risk of future exceedances.

- 2.13. The next steps include updating the Air Quality Action Plan to reflect the status of the AQMAs and outline the continued air quality monitoring relevant to these sensitive locations. There is a continuing commitment to ensure Swale can respond quickly should there be any deterioration in air quality across a range of pollutants. Monitoring results will continue to be published and reported to Defra in the usual way.

3. Proposals

- 3.1. To revoke both AQMAs 3 (East Street) and 5 (Teynham) in line with recommendations made by Defra and Statutory Guidance (Local Air Quality Management, Technical and Policy Guidance 2022).

4. Alternative Options Considered and Rejected

- 4.1. Do not revoke and retain AQMAs 3 (East Street) and 5 (Teynham). This would be contrary to Statutory Guidance outlined in Defra's Local Air Quality Management Technical Guidance 2022. Keeping the AQMAs in place when they should be revoked risks Defra not accepting the AQAP in the future if another AQMA is declared. Subsequently the Council could be in breach of the legislation because we do not have an action plan for areas that should have one.

5. Consultation Undertaken or Proposed

- 5.1. No public consultation is required.

6. Implications

Issue	Implications
Corporate Plan	Priorities: Investing in our environment and responding positively to global challenges: Aligns with Swale's climate change goal and result of reduced pollution emissions
Financial, Resource and Property	There are no significant costs associated with the revocation of the AQMA
Legal, Statutory and Procurement	The revocation of the AQMAs is required for Swale Borough Council to comply with section 83(1) of Part IV of the Environment Act 1995, as amended by the Environment Act 2021. This legislation requires Local Authorities to declare AQMAs to tackle exceedances of any air quality objectives, but having tackled them, the AQMAs must be revoked.

Crime and Disorder	None identified
Environment and Climate/Ecological Emergency	This proposal aligns with ambitions included in the Councils Climate and Ecological Emergency declaration as it is a result of reduced pollution emissions
Health and Wellbeing	The revocation of the AQMAs aligns with a positive impact on Public Health and Wellbeing of the population of Swale BC, as it shows air quality is improving and that these areas are now compliant with national air quality objectives. The revoked AQMAs will be continually reviewed and reported on through the Councils Annual Status Report to ensure improvements continue.
Safeguarding of Children, Young People and Vulnerable Adults	None identified
Risk Management and Health and Safety	<p>Demonstrating the AQMAs are compliant Swale Borough Council should revoke the two AQMAs in line with legislation and statutory guidance. If they do not, then they will not only weaken the status of the AQMA orders but will risk public confidence and risk of criticism from Defra.</p> <p>Keeping the AQMAs in place when they should be revoked risks Defra not accepting the AQAP in the future if another AQMA is declared. Subsequently the Council could be in breach of the legislation because we do not have an action plan for areas that should have one.</p> <p>No Health and Safety implications identified.</p>
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 1: Swale's Air Quality Management document (attached)
- Appendix 2: Detailed Assessment completed by Ricardo 2023 (attached)

3

8. Background Papers

Swales Annual Status Report 2024 can be found at:

https://swale.gov.uk/__data/assets/pdf_file/0006/476376/2024-Air-Quality-ASR-_FINAL_27_06_24_PDF-AA.pdf

Swale's Annual Status Report 2023 can be found at:

https://swale.gov.uk/__data/assets/pdf_file/0005/457835/ASR-2023_-Final_24_10_2023_updated-PDF-AA.pdf

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Swale's Air Quality Management

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

Based on Local Air Quality Management Policy Guidance (PG22) and
Technical Guidance (TG22)

Swale Borough Council
2025

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1. Purpose of this document

- 1.1. This document outlines the approach used by Swale Borough Council to meet its statutory duties involved in Local Air Quality Management (LAQM) to review and assess air quality, and to assist in taking action to improve local air quality.
- 1.2. This document is based on Defra's Local Air Quality Management Policy Guidance (PG22) and Technical Guidance (TG22) to explain key processes involved in carrying out the Council's LAQM duties under the Environment Act 1995 as amended by the Environment Act 2021, and subsequent regulations.
- 1.3. This document aims to be a reference document for new Council Members, Managers, and Environmental Health officers. It can also be used as a mechanism to provide updates over time in procedures, regulations, and statutory guidance (Defra's Local Air Quality Technical Guidance, TG22 and Local Air Quality Policy Guidance, PG22).

2. Scope of this document

- 2.1. This document will explain the overarching processes and procedures of how the air quality monitoring network is managed, considering both automatic monitoring stations and NO₂ diffusion tubes. It will also outline how the Council processes the data collected and how it is reported on.
- 2.2. This document will outline what the Council must do if areas within the district are not in compliance with the National Air Quality Objectives and how remedial actions are taken forward to improve air quality in the form of Air Quality Management Areas (AQMA). This will include the formation of

an Air Quality Action Plan (AQAP) where necessary actions to improve areas of poor air quality within the district are provided.

- 2.3. The document will also detail what the council should do where levels of air quality are shown to have become compliant with the national objectives and the risks associated with not revoking AQMAs.

3. Current status of air quality in Swale

- 3.1. Swale Borough Council has a comprehensive monitoring network of nitrogen dioxide (NO₂) monitoring sites including measurement by automatic analysers at three locations and extensive volume of passive diffusion tube devices distributed around the district. We currently have one automatic analyser station located in Ospringe monitoring NO₂ and two automatic analyser stations, with one located in Newington and one at St Paul's Street monitoring NO₂, PM₁₀ and PM_{2.5} (particulates less than 10 and 2.5 microns in diameter).
- 3.2. Each year the Council has undertaken an annual audit which removes, adds, or relocates tubes relative to our prescribed criteria. Any new monitoring sites are evidence-based relative to traffic congestion data outlined in Swale Transport model with predicted congested areas and where new developments are or where future development is planned. Each monitoring site is also reviewed relative to local knowledge, topography, and relevant receptors. Additional information on the tube audit can be found in section 5.4.
- 3.3. Air quality monitoring has identified six locations within the district that have exceeded the annual Air Quality Objective (AQO) level for NO₂ and one of these locations includes a PM₁₀ declaration. Subsequently this has led to the declaration of six AQMAs within Swale Borough.
- 3.4. Since declaring the AQMAs and as part of our statutory duties required by the Local Air Quality Management framework an AQAP has been in place in pursuit of improving air quality within the AQMAs and the district. In 2023

an updated AQAP was produced which outlines the strategic and local actions we will undertake to improve air quality in Swale between 2023 and 2028. This AQAP replaces the previous action plan which ran from 2018 to 2022.

- 3.5.** The AQAP 2023 -2028 includes thirteen measures in pursuit of improving local air quality over the next five years. The progress of these measures is reported in the Councils Annual Status Report (ASR) which is sent to Defra each year as part of our statutory duties for monitoring and reporting.
- 3.6.** Environmental Health are not directly responsible for the delivery of the majority of the actions. Each measure in the action plan has 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). Some of these are managed by task and finish working groups which will include relevant SBC and KCC officers.
- 3.7.** In 2022 Defra updated their Technical (TG22) ¹and Policy (PG22)² Guidance for Local Air Quality Management. Key updates in the Policy Guidance relate to the current action plan, which provide clearer requirements for both district and county level councils to work together to ensure air quality is improved, as shown below (additional information is provided in section 9 of this document):
- 3.8.** 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”*
- 3.9.** 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”*.

¹ Technical Guidance (TG22): <https://laqm.defra.gov.uk/wpcontent/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

² Policy Guidance (PG22): <https://laqm.defra.gov.uk/wpcontent/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

- 3.10.** 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*”.
- 3.11.** The air quality monitoring network also helps the Council to review and report the effectiveness of AQAP measures to reduce NO₂, PM₁₀ and PM_{2.5} concentrations.
- 3.12.** As well as reporting on air pollution levels within the AQMAs, the ASR also reports NO₂ pollutions levels from the tubes distributed around the district.

4. Introduction to Local Air Quality Management (LAQM)

4.1. LAQM Pollutants of primary interest and Air Quality Objectives

- 4.1.1. At the core of Swale's LAQM delivery there are two pollutant objectives; these are, Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). As outlined in Defra's LAQM TG22, it is a statutory requirement for local authorities to regularly review and assess air quality in their area and take action to improve air quality when objectives set out in regulation are not met.
- 4.1.2. Whilst the responsibility for meeting the PM_{2.5} targets sits with National Government; local authorities are expected to work towards reducing emissions and/or concentrations of PM_{2.5} in their areas. Action to tackle PM₁₀/NO₂ can be expected to contribute towards this.

Table 1. Pollutants of Primary Interest in Swale

LAQM Pollutants of Primary Interest		
Pollutant	Objective	Concentration measured as
Particles (PM ₁₀)	50 µg/m ³ not to be exceeded more than 35 times a year	24 hour mean
	40 µg/m ³	annual mean
Particles (PM _{2.5})	20 µg/m ³	24 hour mean
Nitrogen dioxide (NO ₂)	200 µg/m ³ not to be exceeded more than 18 times a year	1 hour mean
	40 µg/m ³	annual mean

4.2. Overview of reporting

- 4.2.1. Swale Borough Council is required to submit an Annual Status Report (ASR) by 30th June each year. The ASR is a public-facing summary, which local authorities are mandated to complete. The LAQM website provides templates for this.
- 4.2.2. Should we fail to produce a draft ASR by the end of the calendar year (6 months past ASR deadline) and in the absence of engagement with the LAQM Helpdesk, the local authority may be issued with a ministerial direction under section 85 (3) of the Environment Act 1995.
- 4.2.3. Local authorities are expected to make the ASR available on their website at the earliest opportunity to help promote air quality locally.
- 4.2.4. The ASR is designed to allow sufficient understanding in the analysis of pollutant occurrence to support the identification of new non-compliant areas (i.e., 'hot spots') and to report on progress within existing AQMAs.

5. Air Quality monitoring for review and assessment

5.1. Location and siting of NO₂ diffusion tubes

- 5.1.1. The Council has progressively adapted the air quality monitoring strategy in accordance with air quality issues specific to our area. We have extended the monitoring network to identify potential hot spots, whilst a number of sites have been relocated to more relevant areas or have been discontinued as part of our annual tube audit, in areas where data has shown that compliance is achieved. It is essential we undertake the tube audit to ensure effective coverage within the district, whilst appropriately managing financial resources we have available for air quality monitoring.

5.1.2. The location for monitoring sites must be assessed by Swale's Environmental Health team, who consider the following factors such as:

- Nearest receptors
- Topography of the road will be assessed considering width and steepness of the road, also buildings surrounding the road and their height which can affect the dispersion of air and air pollution concentration levels.
- Traffic volume and traffic flow
- Site classification

5.2. Site classifications

5.2.1. For LAQM reporting purposes, local authorities should use the site classifications presented in TG22: Table 7-7. For example, most tube sites located within the Swale Borough are 'Roadside' sites, these will typically be within one to five metres of the kerb of a busy road (TG22: Table 7-7).

Site Type	Description
Urban centre	An urban location representative of typical population exposure in towns or city centres, for example, pedestrian precincts and shopping areas
Urban background	An urban location distanced from sources and therefore broadly representative of city-wide background conditions, e.g. urban residential areas
Suburban	A location type situated in a residential area on the outskirts of a town or city
Roadside	A site sampling typically within one to five metres of the kerb of a busy road (although distance can be up to 15 m from the kerb in some cases)
Kerbside	A site sampling within one metre of the kerb of a busy road
Industrial	An area where industrial sources make an important contribution to the total pollution burden
Rural	An open countryside location, in an area of low population density distanced as far as possible from roads, populated and industrial areas
Other	Any special source-orientated or location category covering monitoring undertaken in relation to specific emission sources such as power stations, car-parks, airports or tunnels

5.2.2. Additional site classifications can be considered and are summarised in Table 7-8. The site classifications used for the Automatic Urban and Rural Network (AURN) are those defined in the Air Quality Standards Regulations 2010 and

differ from the site classifications used for LAQM. The air information resource called UK-Air³ provides monitoring data from the AURN. The AURN is the UK's largest automatic monitoring network and is the main network for national monitoring. When obtaining data from UK-Air, local authorities should use this table in order to work out how the site should be classified for LAQM reporting purposes. For example, a site classified in UK-Air as Urban Traffic would be either Roadside or Kerbside for LAQM reporting purposes. It is also useful to consider both classifications when site new tubes or stations.

5.2.3. For completeness TG22: Table 7-8 – Air Quality Monitoring Site Classification Used on UK-Air Website for Comparison with LAQM Classifications.

Air Quality Standards Regulations 2010 Classification	LAQM Classification	AQD 2008 Description
Urban Traffic	Roadside or Kerbside	Sites in an urban area at least 25 metres from the edge of major junctions and no more than 10 metres from the kerbside
Urban Background	Urban Background or Urban Centre	Sites in an urban area away from major roads that are representative of exposure of the general population. Urban background sites should not be dominated by single sources and should be representative of a wide area
Suburban Background	Suburban	Sites in a suburban area away from major roads that are representative of exposure of the general population. A suburban area is defined as a location type situated in a residential area on the outskirts of a town or city. Suburban background sites should not be dominated by single sources and should be representative of a wide area
Rural Background	Rural	Sites in a rural area away from roads that are representative of exposure of the general population. Rural background sites should not be influenced by agglomerations or industrial sources and should be representative of a wide area
Urban Industrial	Industrial	Site in an urban residential area downwind of specific industrial source
Suburban Industrial	Industrial	Site in a suburban area downwind of specific industrial source. A suburban area is defined as a location type situated in a residential area on the outskirts of a town or city

³ <https://uk-air.defra.gov.uk/networks/network-info?view=nondefraaqmon>

5.4. Tube audit

5.3.2. As part of adapting our air quality monitoring strategy the Environmental Health team undertakes an annual audit each year to identify new potential hot spots, remove or relocate monitoring tubes to more relevant areas.

5.3.3. Table 2 shows that sites (except Isle of Sheppey) can be removed if they are below $32 \mu\text{g}/\text{m}^3$ for 2 years or more (2 >). The Isle of Sheppey sites are removed if they are below $20 \mu\text{g}/\text{m}^3$ for 2 years or more (2 >). This because it is a developing area, and all sites are currently low.

Table 2. SBC tube audit criteria

Tube audit criteria
All tube sites except Isle of Sheppey
Sites will be removed if they are below $32 \mu\text{g}/\text{m}^3$ for 2 years or more (2 >)
Isle of Sheppey
Sites will be removed if they are below $20 \mu\text{g}/\text{m}^3$ for (more than) 2 years or more (2 >). This because it is a developing area, and all sites are currently low. Relocation for sites will be considered.
AQMAs and revoked AQMAs
If tube sites are to be closed due to the above criteria, then officers need to review the number of tubes to ensure spatial coverage is achieved and consider relocating the tubes to a more suitable site or leave them in situ.
Other considerations
Some old sites may not be removed as we must also consider historical continuity and long-term trends at those sites. Other reasons a tube may also stay sited is to study the impact of a development.

5.3.4. New sites can be added based on evidence from traffic congestion data outlined in Swale Transport model, where new development exists or where future development is planned, and where congestion is observed. Traffic

flow, receptors near the road and topography of the area is also reviewed prior to relocation. These tube deployments are in line with the Defra Calendar and Local Air Quality Management Technical Guidance (TG22).

- 5.3.5. Excessive volumes of diffusion tubes come with an unnecessary cost both financial and staff resource for the Council. Therefore, it is essential that we manage the distribution of tube monitoring effectively through the tube audit.

5.4. Installing new continuous monitoring sites

- 5.4.1. Continuous monitoring stations require a permanent power supply, and (dependent upon the equipment installed), often require air-condition units and a housing. The power supply must be of sufficient rating to support the equipment to be installed. In some cases, such as roadside monitoring, it is possible to arrange to draw power from a nearby facility (such as street lighting) without having to install significant lengths of underground or over-ground cables. However, not all such installations offer an uninterrupted power supply. All electrical work is undertaken by a fully qualified and industry approved electrician.
- 5.4.2. It is important that the financial and other implications of embarking on a monitoring programme are fully understood before any action is taken. Significant costs can come with purchasing, installing, and running continuous monitoring analysers, including officer time in the management and maintenance of a station. In addition, there is a large amount of time involved in the coordination of setting up a monitoring station with considering planning approval, the highways agency, traffic management services, instrument suppliers, enclosure suppliers, delivery companies, air conditioning engineers, electricity suppliers, site electricians, the company that builds the plinth and the telecommunications suppliers.
- 5.4.3. Swale has three continuous monitoring stations with two stations monitoring PM₁₀, PM_{2.5} and NO₂. This is more than any other district in Kent. The Local

Authority would consider installing a continuous analyser in areas where an exceedance of the air quality objective has been identified such as an AQMA. However, not all AQMAs can have a continuous analysis due to the significant costs and time involved in maintaining these. The decision lies with the Local Authority, as there is no guidance or legislation that requires a Local Authority to have a continuous analyser.

5.4.4. Local authorities should use the site classifications as specified in Table 7-7 for LAQM reporting purposes. However, in order to aid potential future expansion of the UK monitoring network for national compliance purposes, local authorities are encouraged to locate monitoring stations in one of the six classifications provided in Table 7-8.

5.4.5. Urban background monitoring is useful if there is a need to monitor long-term trends in pollutant concentration or population exposure. Background monitoring sites are less likely than roadside or kerbside sites to be affected by very local factors, for example changes in traffic on a particular road.

It is necessary to consider certain micro-scale siting requirements for LAQM purposes:

5.4.6. Sites should be in as open a setting as possible in relation to surrounding buildings. Immediately above the site should be open to the sky, with no overhanging trees, structures or buildings. The flow around the inlet sampling probe shall be unrestricted without any obstructions affecting the airflow in the vicinity of the sampler (normally some metres away from buildings, balconies, trees and other obstacles and ideally at least 0.5m from the nearest building in the case of sampling points representing air quality at the building line).

5.4.7. In general, the inlet sampling point should be between **1.5m (the breathing zone) and 4m above the ground. For security reasons, the inlet should be greater than 2m**, though it is recognised that lower sampling heights better reflect the ambient conditions encountered by members of the public.

- 5.4.8. The inlet probe should not be positioned in the immediate vicinity of sources in order to avoid the direct intake of emissions unmixed with ambient air.
- 5.4.9. The sampler's exhaust outlet should be positioned so that recirculation of exhaust air to the sampler inlet is avoided.
- 5.4.10. The site should not be close to local or point emissions sources unless these have been specifically targeted for investigation. For industrial sites, where specific sources are being targeted, monitoring should be carried out at the point of maximum impact as determined by modelling; and
- 5.4.10. For urban background or suburban sites there should be **no major sources of pollution** (for example a large multi-storey car park) **within 50m**. There should be **no medium sized emission sources** (for example, petrol stations, boiler vents, or ventilation outlets to catering establishments) **within 20m**.

5.5. Air Quality Monitoring

Below provides a summary of key aspects to be considered for monitoring:

- 5.5.1. Locations should be selected bearing in mind that results are likely to be used to help demonstrate the performance of dispersion. Therefore, care should be taken to ensure that the monitoring site is sufficiently close to the dominant pollution source (i.e., roadside sites) and nearby receptor.
- 5.5.2. Monitoring should also be undertaken at a number of background sites to obtain a representative background concentration for the area, supplementing the information provided by Defra's national background maps⁴.

⁴ <https://uk-air.defra.gov.uk/data/laqm-background-home>

- 5.5.3. To validate NO₂ diffusion tube data (bias adjustment), additional tubes should be exposed in triplicate at a suitable nearby automatic monitoring station, using the same monthly exposure periods as the other sites; and
- 5.5.4. Monitoring results, provided that they comply with QA/QC procedures are located at suitable locations relevant of worst-case public exposure and should take precedence over modelling results. Therefore, if monitoring data do not indicate a likely exceedance of an air quality objective, there should be no need to declare an AQMA.
- 5.5.5. For comparison with the AQS objectives, ideally, monitoring should be completed for a full calendar year. Should baseline monitoring be required for construction or demolition purposes then monitoring should be undertaken for at **least three months** prior to site activity to ascertain background levels (it would also be necessary to monitor throughout the construction or demolition phases of the work to determine impacts).
- 5.5.6. In Swale monitoring is undertaken at each diffusion tube location for one year. This includes monthly deployment and sampling results which is averaged for the whole year.
- 5.5.7. According to Defra Technical Guidance (TG22) tubes with less than 75% data capture need to be annualised. Annualisation techniques can be used to estimate an annual average from a part year average/ short-term monitoring result. For annualisation to be completed, there must be 25% annual monitoring data available.

Instructions and examples of annualisation are set out for continuous monitoring in Box 7-9 and diffusion tube monitoring in Box 7-10 within Defra's TG22 Guidance

- 5.5.8. In order to ensure the correct functioning of the instruments, it is necessary to attend the site periodically in order to perform local site operator duties such as

changing filters or cleaning the inlet. Equipment must also be kept in calibration in line with manufacturer specifications.

5.5.9. It is also necessary to service the instruments **every six months** in order to limit instrument breakdowns.

5.5.10. To improve the reliability and validity of the data, it is best practice that the instruments should be periodically checked by an independent organisation accredited to perform QA/QC checks to ISO17025:2017. Ideally, this should be performed **every six months**.

6. Review and Assessment Process - Annual Status Report (ASR)

The Annual Status Report should summarise local monitoring data collated by the local authority over the past five years, and particularly focus on the last year's results, comparing these against the air quality objectives. The focus should be on NO₂, PM₁₀, PM_{2.5} (where appropriate).

The summary results of monitoring data should answer the following questions:

- Have there been any changes in the local authority's air pollution monitoring network (new/closed/relocated sites, change in monitoring methodology) over the past year – and if so, for which reason(s)?
- Are concentrations reducing in existing AQMAs?
- Are there any new exceedances of the air quality objectives outside currently declared AQMAs?

6.1. Core requirements of the ASR

- 6.1.1. To report progress on the implementation of measures in the AQAP and other measures and their impact in reducing concentrations to below air quality objectives⁵.
- 6.1.2. To provide a summary of monitoring or any modelling data in order to assess the air quality situation in our area and likelihood of air quality breaches, and to provide the necessary evidence base for the impact of air quality measures.
- 6.1.3. To report on significant new developments that might affect local air quality.
- 6.1.4. To present information in a public-facing executive summary for the lay reader, so that the local public can more easily engage with local air quality issues and measures taken to improve it.
- 6.1.5. Directors of Public Health must be part of the air quality management process in local authorities in England. Working in partnership will increase support for measures to improve air quality, with co-benefits for all. It is recommended that Directors of Public Health review and approve local authority ASRs in England.
- 6.1.6. Should a local authority in England fail to produce their ASR by the end of the calendar year (6 months past ASR deadline) and in the absence of engagement with the LAQM helpdesk, the local authority may be issued with a ministerial direction under section 85 (3) of the Environment Act 1995.

⁵ <https://laqm.defra.gov.uk/wp-content/uploads/2023/11/LAQM-Policy-Guidance-2022.pdf>

7. Air Quality Management Areas

7.1. Declaration of AQMAs based on the ASR findings

- 7.1.1. Local authorities have a duty under Section 83(1) of the 1995 Act to designate those areas where the air quality objectives are not being met or are likely to be shown to be at risk of not meeting them, and where people are likely to be regularly present, as AQMAs⁶
- 7.1.2. As advised in Defra's Local Air Quality Management Technical Guidance (TG22) if a local authority finds any places where the objectives are not likely to be achieved, it must declare an Air Quality Management Area there. This area could be just one or two streets, or it could be much bigger. Then the local authority will put together a plan to improve the air quality - a Local Air Quality Action Plan.
- 7.1.3. The vast majority of AQMAs in the UK are related to road traffic emissions, where attainment of the annual mean objective for nitrogen dioxide (NO₂) is considered unlikely, sometimes in association with exceedances of the 24-hour mean PM₁₀ objective. By comparison, there are very few AQMAs associated with domestic, industrial or other transport-related emissions, although in Northern Ireland a number of AQMAs have been declared as a consequence of pollution associated with the residential heating sector⁷.
- 7.1.4. Based on the information collated and reported in the Annual Status Report, the local authority should identify whether there is a risk of exceeding an air quality objective outside any pre-existing AQMAs. If this is the case, the local authority will need to proceed to the declaration of an AQMA without delay.

⁶ <https://laqm.defra.gov.uk/wp-content/uploads/2023/11/LAQM-Policy-Guidance-2022.pdf>

⁷ <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

This should be possible if the monitoring data and/or screening assessment results are deemed sufficient to conclude on the risk of exceedance and the area likely to be affected. It should also be the case if more detailed information collated over the past 12 months (such as detailed dispersion modelling of road traffic or industrial emissions) is now available and can be appended to the ASR to support the decision to declare. In England, from 2023, an **AQMA must be declared within 12 months from identifying an exceedance**.

7.1.5. Once an AQMA has been designated, an AQAP should be prepared within **18 months** following the date of designation. Progress on the AQAP should be included in the ASR⁸.

7.1.6. Where an exceedance of Air Quality standards has been identified crossing the boundary of two or more local authority areas, it is possible to submit a joint AQMA through a collaborative approach between the local authorities responsible. The process for declaring a joint AQMA is the same as for an AQMA located entirely within a single local authority boundary but the LAQM.

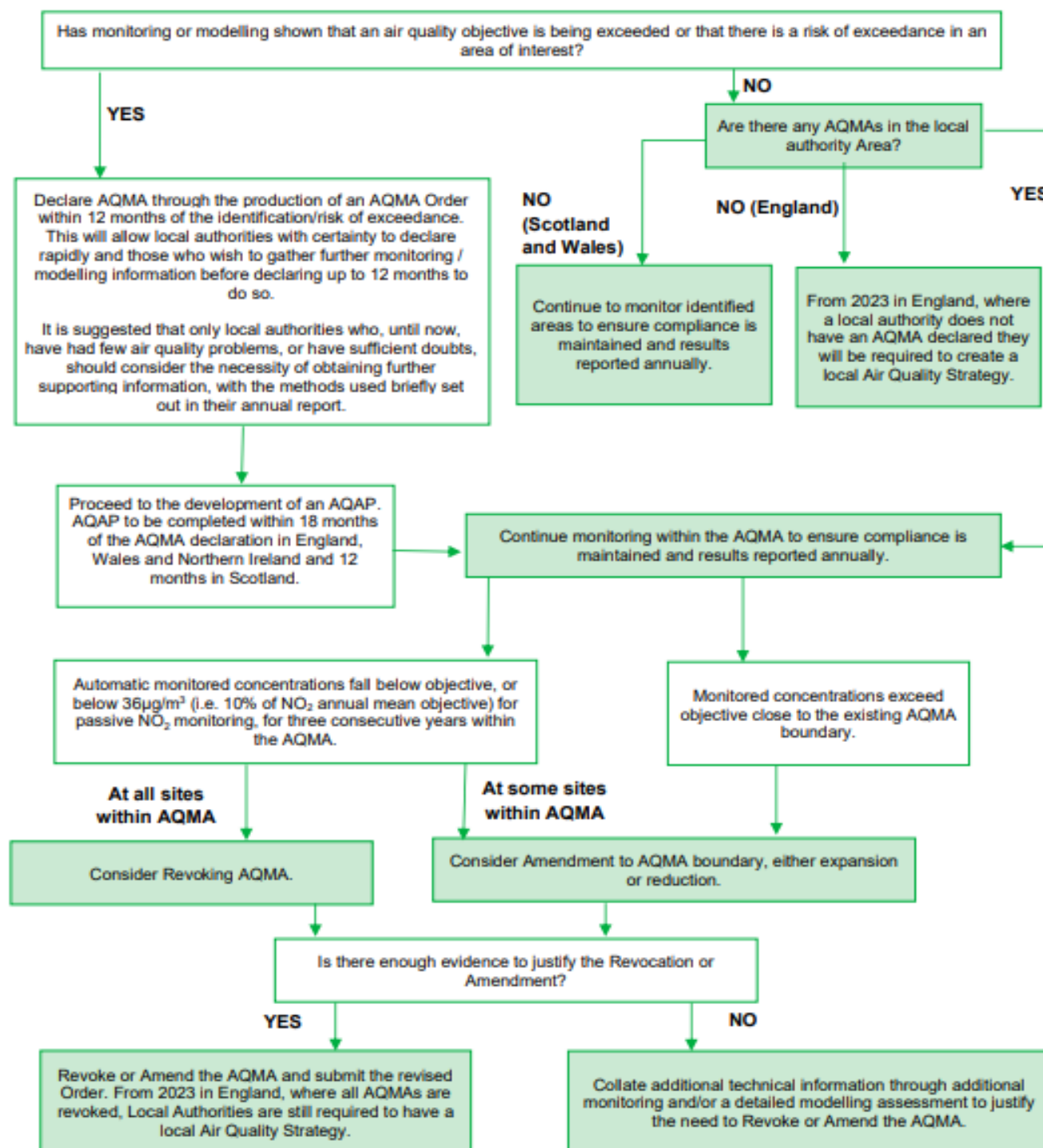
7.2. Amendment and Revocation of AQMAs

7.2.1. The revocation of an AQMA should be considered following **three consecutive years of compliance** with the relevant objective as evidenced through monitoring. Where NO₂ monitoring is completed using diffusion tubes, to account for the inherent uncertainty associated with the monitoring method, it is recommended that revocation of an AQMA should be considered following three consecutive years of annual mean NO₂ concentrations being lower than 36µg/m³ (i.e., within 10% of the annual mean NO₂ objective). **There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period.**

⁸ <https://laqm.defra.gov.uk/wp-content/uploads/2023/11/LAQM-Policy-Guidance-2022.pdf>

- 7.2.2. It is not advisable for the revocation of an AQMA to be based solely upon compliance in a year not representative of long-term trends. For example, compliance being reached in 2020 may not be representative of long-term trends in pollutant concentrations due to the change in activity observed across the UK as a result of COVID-19. Where 2020 is one of many consecutive years of compliance, this may be considered for revocation.
- 7.2.3. **Defra will not appraise AQAPs for AQMAs that have been in compliance for five years unless a likely exceedance has been identified in the area.** Local Authorities will instead be advised to revoke the AQMA. Keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in LAQM.
- 7.2.4. Swale Borough Council currently has **one Strategic AQAP covering all AQMAs in the district**. Therefore, keeping an AQMA in place when it should be revoked **risks Defra not accepting any amendments to the current AQAP or any new AQAPs in the future**. This has been made clear by Defra. For example, if any monitoring data identify new areas where the Air Quality Objectives are not being met, we would not be able to create an action plan for these areas, due to not revoking the AQMAs that should have been revoked. Subsequently we would be in **breach of the legislation** because we do not have an action plan for areas that should have one.
- 7.2.5. From 2023, following revocation of all AQMAs in a local authority area, local authorities in England should put in place a **local air quality strategy** to ensure air quality remains a high-profile issue and to ensure it can respond quickly should there be any deterioration in condition. If other AQMAs in the district are present with an accompanying strategic action plan, a section to ensure revoked AQMAs remain high profile can be included.
- 7.2.6. The process for declaring or revoking an AQMA is outlined in the LAQM Technical Guidance document (TG22): Box 3-2 – AQMA Process Diagram is shown below.

TG22: Box 3-2 – AQMA Process Diagram



8. Air Quality Action Plans (AQAPs)

8.1. Introduction

8.1.1. Every local authority that has an active AQMA is required under Part IV of the Environment Act and Part III of the Environment (NI) Order 2002 to provide an Air Quality Action Plan (AQAP) to address the areas of poor air quality that have been identified within the AQMA. The emphasis within AQAPs should be two-fold:

- To develop measures that will provide the necessary emissions reductions to achieve the air quality objectives within specified timescales and to set out how the local authority will exercise its functions to secure achievements of air quality objectives; and
- Act as a live document which is continually reviewed and developed, to ensure current measures are progressing and new measures are brought forward. From April 2023, it will be recommended, where possible, that local authorities in England maintain an up-to-date online version of their AQAP as a resource both for the public and for other local authorities. Local Authorities should still, as a minimum, **revise their AQAP every 5 years**.

8.1.2. Defra's Policy Guidance LAQM.PG22⁹ states that, from 2023, an AQAP should be prepared within **18 months** of an AQMA being declared.

8.1.3. Once a draft has been prepared, the AQAP should be submitted to Defra/the Devolved Administration for initial appraisal at the statutory consultation stage, with the AQAP then finalised and again submitted to Defra/the Devolved Administration for approval. The draft and final AQAP can be submitted to Defra/the Devolved Administration via the LAQM Porta

⁹ <https://laqm.defra.gov.uk/wp-content/uploads/2023/11/LAQM-Policy-Guidance-2022.pdf>

- 8.1.4. Directors of Public Health must be part of the air quality management process in local authorities in England. Working in partnership will increase support for measures to improve air quality, with co-benefits for all. It is recommended that Directors of Public Health review and approve local authority AQAPs.
- 8.1.5. 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.
- 8.1.6. The Environment Act requires that AQAPs be regularly reviewed and must be revised if a local authority considers there is a need for further or different measures to be taken in order to achieve air quality standards; or if significant changes to sources occur within your local area. In England, local authorities are expected to review AQAPs at least **every five years**.
- 8.1.7. It is important to focus on the effective implementation and delivery of measures developed to address the specific local air quality issues. Defra has published an AQAP template to assist local authorities in England with the development of their AQAPs and ensure a consistent format for AQAP reporting.
- 8.1.8. Furthermore, the ASR for England provides a consistent format for local authorities to report on the progress of their AQAP and other supporting measures developed to reduce emissions towards achieving the air quality objectives.

8.2. What should be included in an AQAP

8.2.1. It is recognised that there is not a 'one size fits all' approach to developing AQAPs. They should be adapted to every local situation and most importantly are seen as part of an integrated package of measures, particularly in relation to linking with other key policy areas, notably:

- Land-use planning and sustainable development;
- Transport Planning, promoting sustainable transport, local transport management, integration with local transport plans;
- Environmental noise management;
- Climate change policies in relation to carbon management and reduction

8.2.2. Key common requirements for the development of an effective AQAP:

1. Develop the AQAP in stages;
2. Undertake appropriate local monitoring and assessment (source apportionment);
3. Decide what level of actions are required;
4. Establish links to other key policy areas / strategies;
5. Establish a Steering Group with key stakeholder groups at an early stage;
6. Undertake measures selection and impact assessment;
7. Agree monitoring and evaluation of success; and
8. Undertake consultation.

8.2.3. As a minimum, AQAPs should include the following:

- **Quantification of source contributions (e.g., HGVs, buses, taxis, other transport, industrial or domestic sources etc.) responsible for the exceedance**

of the relevant objective; knowing the source of the problem will allow the AQAP measures to be effectively targeted;

- **Quantification of impacts of proposed measures** including, where feasible, expected emission and concentration reductions (either locally obtained and/or via national monitoring/modelling statistics). It is important that the local authority shows how it intends to monitor and evaluate the effectiveness of the plan;
- **Clear timescales**, including milestones and expected outcomes, which the authority and other delivery partners propose to implement the measures within the AQAP; and
- **Defined roles and responsibilities** that detail how the local authority and other delivery partners, including transport, planning and health departments, will take ownership of the problem and in what capacity they will work together to implement the AQAP.

8.2 On-going assessment of AQAPs progress

8.2.1. The success of the AQAP is dependent upon the on-going assessment and reporting of progress in the implementation of measures and the evidence acquired from on-going evaluation of the impacts of measures that are reported through the annual LAQM report (ASR). The use of monitoring to show the decline in pollutant concentrations attributed to the implementation of measures is an obvious basis on which local authorities should provide evidence to show progress. However, for some measures alternative indicators, such as use of cycle schemes and passenger numbers on buses, can be used to report progress.

8.2.2. Local authorities should ensure that the AQAP Steering Group continues to meet on an annual basis after the adoption and implementation of measures contained within their AQAPs in order that a review of the AQAP and its progress is undertaken. Where, in undertaking their review, evidence shows that unforeseen barriers to progress have arisen, or measures are no longer

suitable, the AQAP should be updated to reflect the local authority's position. The AQAP should be maintained as a "live" strategy. Where necessary, updates to source apportionment should be made to ensure that the measures remain targeted and focused within the AQAP.

8.3. Swale's AQAP and Steering group

- 8.3.1. Swale's 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. The Strategic action plan replaces the previous action plan which ran from 2018 to 2022. The measures detailed within the updated action plan are largely district-wide with some localised measures and are relevant to all AQMAs.
- 8.3.2. The AQAP Steering Group was formed in early 2022 to develop and deliver the Strategic AQAP update for Swale. The Steering Group is 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.
- 8.3.3. The AQAP 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.
- 8.3.4. The AQAP Steering group meet quarterly every three to four months throughout the lifetime of the action plan. Task and finish sub-groups responsible for implementing and delivering specific measures meet more regularly and report back to the Steering group. The task groups are to be also responsible for providing further sub-actions and associated measurable milestones.

8.3.5. Actions undertaken by the Swale AQAP Steering Group are outlined in the AQAP 2023 -2028 document located on the Swale Borough Council website¹⁰

9. Roles and Responsibilities for two tier authorities

9.1. In 2022 Defra updated their Technical (TG22)¹¹ and Policy (PG22)¹² Guidance for Local Air Quality Management. Key updates in the Policy Guidance relate to the current action plan, which provide 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”.

9.3. Districts (PG22: Chapter 3: LAQM - Roles and Responsibilities)

9.3.1. Defra advises in two-tier authorities, key functions (relating to the assessment of local air quality, designation of an AQMA and preparation of an AQAP) remain at the district council level. Under the changes introduced through the Environment Act 2021, district councils will be required to coordinate action across local government structures and public authorities. This includes

¹⁰ https://swale.gov.uk/_data/assets/pdf_file/0019/451432/AQAP-2023-to-2028_-FINAL_05_09_23-AA.pdf

¹¹ <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

¹² <https://laqm.defra.gov.uk/air-quality/featured/england-exc-london-policy-guidance/>

identifying key sources of air pollution and actions that could be taken by multiple parties where necessary, identifying authorities who will need to partner the local authority in developing and carrying out AQAPs.

- 9.3.2. Under section 82 of Part IV of the Environment Act 1995 district councils should undertake periodic review and assessment of air quality within their area. The results of this review and assessment should be set out in the ASR.
- 9.3.3. Under section 83 the district council is required to designate an AQMA when the review and assessment that it has carried out indicates that any air quality objectives are not being, or are not likely to be, achieved. The district council may amend or revoke an area as appropriate in the light of subsequent reviews.
- 9.3.4. Under Section 83 Local authorities/district councils are required to identify sources of emissions responsible for any failure to achieve air quality standards or objectives and identify and inform the local or public authorities responsible for the emissions.
- 9.3.5. Under section 83A, as amended by the Deregulation Act 2015 - Part 4 of Schedule 13, once an AQMA has been designated the district council should prepare an AQAP that sets out how it will achieve the air quality standards or objectives for the area that it covers. The district council should provide information on the timescales for the achievement of measures that it can take under the powers that it has. Relevant powers and mechanisms include environmental health functions including those concerning the Clean Air Act (e.g. the ability to declare smoke control areas) and land use planning. The AQAP should be in place within 18 months of the district council declaring the AQMA.
- 9.3.6. Engagement with the county council should take place at the start of the process. In reviewing and assessing air quality in a local authority area or preparing an AQAP, the district council should consider any recommendations made to it by the county council in respect of the areas of responsibility falling

to the district council. It may not agree with these recommendations (see PG22, paragraph 3.22). The County Council will be required to commit to appropriate actions the county council will take to secure that air quality objectives are achieved. The AQAP will be a collaborative plan reflecting the need for upper and lower tiers to work together to reduce pollution.

9.3.7. The district council should consult on its AQAP (PG22, Chapter 5) and is expected to make a copy of the Plan and ASR freely available for public inspection on their website.

9.4. County Councils (PG22: Chapter 3: LAQM - Roles and Responsibilities)

9.4.1. County councils have obligations under LAQM as set out below and in practice they should proactively engage with the district council as soon as an air quality issue is identified.

9.4.2. County councils were already required under the Environment Act 1995 to collaborate with district councils on air quality. We have strengthened this requirement through the Environment Act 2021 making the wording clearer to avoid ambiguity.

9.4.3. If informed by a district council of its intention to prepare an AQAP, a county council must propose specific measures it will take to help secure the achievement and maintenance of air quality standards and objectives in the relevant district local authority's area, including target dates by which the measures should be carried out. District councils should incorporate county council proposals and dates in their AQAP.

9.4.4. Upper tier authorities have a duty to support district councils to carry out their functions by providing details on planned action at county level that could impact air quality (e.g. transport plans) and proposing actions they could take using powers and levers available to them. The Environment Act 1995 requires upper tier authorities to:

- Provide the lower tier authority with proposals for particular measures it will take to contribute to the achievement and maintenance of Air Quality Objectives, including a date by which each measure will be carried out.
- Deliver the actions they are responsible for as set out in the AQAPs, to the timescales defined.
- Provide assistance to the district council to coordinate action across neighbouring local authorities and with other public bodies.

9.4.5. There is very strong evidence on the significant contribution of transport emissions to air pollution in urban areas and the legislation requires county councils to bring forward measures in relation to addressing the transport impacts for inclusion in any AQAP.

9.4.6. The county council is a consultee to ASRs and AQAPs. Under section 86(2) the county council may make recommendations to the district council in relation to any review and assessment of air quality or development or amendment of AQAPs in the local authority area.

9.5. Neighbouring authorities (PG22: Chapter 3: LAQM - Roles and Responsibilities)

9.5.1. Given the transboundary nature of air pollution, emissions from sources in one local authority can contribute to exceedances of Air Quality Objectives in another. Defra advises the Environment Act 2021 amended the Environment Act 1995 to place a new duty on local authorities to work collaboratively with neighbouring authorities to create a cooperative framework that would enable authorities to tackle pollution emanating from sources outside of the local authority's area. The changes will ensure local authorities receive support from neighbouring authorities to deliver compliance with local air quality limits and objectives. The duties on neighbouring authorities require them to:

- Actively support district councils to carry out their functions. This includes providing details on planned actions that could impact air quality and proposing actions they could take using powers and levers available to them.

- Provide the relevant neighbouring authorities with proposals for particular measures it will take to contribute to the achievement and maintenance of Air Quality Objectives, including a date by which each measure will be carried out.
- Deliver the actions they are responsible for as set out in the AQAPs, to the timescales defined.

9.6. Public Health (PG22: Chapter 3: LAQM - Roles and Responsibilities)

9.6.1. Defra advises Directors of Public Health must be part of the air quality management process in local authorities. Working in partnership will increase support for measures to improve air quality, with co-benefits for all. It is recommended that Directors of Public Health approve local authority draft ASRs prior to submission and AQAPs and are directly involved in the formulation and monitoring of Air Quality Strategies, where these are present.

Further examples of joined-up working include:

- To ensure the Joint Strategic Needs Assessment has up to date information on air quality impacts on the population and the impact on health disparities;
- To work closely with local authority air quality officers in formulating the needs assessment and other air quality initiatives – e.g. have regular update meetings on key, emerging issues;
- To facilitate the consideration of air quality issues at board level within the local authority as required.

Glossary

- Air Quality Management Area (AQMA)
- Air Quality Action Plan (AQAP)
- Annual Status Reports (ASRs)
- NO₂ (Nitrogen Dioxide)
- PM₁₀ and PM_{2.5} (particulates less than 10 and 2.5 microns in diameter)
- Local Air Quality Management (LAQM)
- Defra (Department for Environment, Food & Rural Affairs)
- Air Quality Objective (AQO)

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SITTINGBOURNE AND TEYNHAM AIR QUALITY MANAGEMENT AREAS

Detailed assessment

Report for: Swale District Council

Ricardo ref. ED18432112

Issue: 2

18/12/23

Customer:

Swale Borough Council

Customer reference:

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EXECUTIVE SUMMARY

Annual mean concentrations of NO₂ measured by monitors in and around two Swale Air Quality Management Areas (AQMA) for Teynham (AQMA 5) and East Street Sittingbourne (AQMA 3) have been consistently below the government Air Quality Objective for five and four years, respectively. Defra have expressly indicated to Swale that both AQMAs should begin the process of revocation in their feedback of the 2022 and 2023 Annual Status Reports.

To ensure that any decisions are made on robust evidence, Swale continued to monitor air quality for an additional year (2023) and commissioned Ricardo to carry out a Detailed Assessment of NO₂ concentrations in the AQMAs, considering the future committed developments that could impact air quality in these areas.

Ricardo have therefore carried out air quality modelling to assess:

- whether citizens of Swale are likely to be impacted by exposure to concentrations of NO₂ at locations in the AQMAs where monitoring is not currently undertaken.
- whether citizens of Swale within the AQMAs are likely to be exposed to elevated concentrations of NO₂ in the future if traffic increases beyond current levels.

To achieve these goals, modelling was carried out for two years:

1. a 2022 baseline, using traffic data provided by the Council, SWECO and national forecasts for the vehicle fleet composition; and
2. a 2028 future scenario considering the impact of future committed developments that could adversely impact concentrations in the AQMAs. This scenario was modelled assuming that all traffic generated by each development would run through the two AQMAs.

Sensitivity testing was also carried out into the potential impact of reduced fleet turnover in Swale relative to national projections.

All modelling was carried out following appropriate LAQM technical guidance and best practice.

The conclusions of the study are summarised in Box 1.

Box 1: Key conclusions of the Detailed Assessment

- No relevant receptor is predicted to have an annual mean NO₂ concentration within 10% of the Air Quality Objective for annual mean NO₂ at any location of relevant exposure in 2022.
- The Sittingbourne and Teynham AQMAs continue to be below 10% of the Air Quality Objective for annual mean NO₂ at all locations of relevant exposure in the modelled 2028 scenario.
- The model results therefore indicate the AQMAs can be revoked without risk of future exceedances.

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1. INTRODUCTION

Ricardo have been commissioned by Swale Borough Council (SBC) to carry out a Detailed Assessment to quantify public exposure to concentrations of Nitrogen Dioxide (NO₂) across Sittingbourne and Teynham. Defra have expressly indicated to Swale that both AQMAs should begin the process of revocation in their feedback of the 2022 and 2023 Annual Status Reports.

Ricardo have therefore carried out air quality modelling to assess:

- whether citizens of Swale are likely to be impacted by exposure to concentrations of NO₂ at locations in the AQMAs where monitoring is not currently undertaken.
- whether citizens of Swale within the AQMAs are likely to be exposed to elevated concentrations of NO₂ in the future if traffic increases beyond current levels.

To achieve these goals, modelling was carried out for two years:

1. a 2022 baseline, using traffic data provided by the Council, SWECO and national forecasts for the vehicle fleet composition; and
2. a 2028 future scenario considering the impact of future committed developments that could adversely impact concentrations in the AQMAs. This scenario was modelled assuming that all traffic generated by each development would run through the two AQMAs.

This report sets out the modelling methodology and results of the assessment.

2. AIR QUALITY STANDARDS

The Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland (Defra, 2007) sets out UK policy on air quality including a framework for reducing hazards to health from air pollution and meeting international commitments. It sets standards and objectives for ten main air pollutants (including nitrogen dioxide, PM₁₀ and PM_{2.5}) to protect health, vegetation and ecosystems. The European Union has also set limit values for nitrogen dioxide, PM₁₀ and PM_{2.5} (EU Directive 2008/50/EC) and is implemented in UK law through the Air Quality Standards Regulations (2010). The limit values for nitrogen dioxide, PM₁₀ and PM_{2.5} are the same numerical concentrations as the UK objectives.

The AQOs which are relevant to this air quality impact assessment are detailed in Table 2-1.

Table 2-1: National Air Quality Objectives (AQOs)

Pollutant	Measured As	Objective
Nitrogen dioxide (NO ₂)	Annual Mean	40 µg/m ³
	1-hour Mean	200 µg/m ³ not to be exceeded more than 18 times a year
Particles (PM ₁₀)	Annual Mean	40 µg/m ³
	24-hour Mean	50 µg/m ³ not to be exceeded more than 35 times a year
Particles (PM _{2.5})	Annual Mean	20 µg/m ³

LAQM.TG (22) sets out that the annual mean AQOs for human health apply at locations where the public may be regularly exposed, such as building facades of residential properties, schools, hospitals and care homes. The 1-hour and 24-hour mean AQOs apply at locations where it is reasonable to expect members of the public to spend at least these periods of time, such as busy shopping streets and school playgrounds for the 1-hour mean, and hotels or residential gardens for the 24-hour mean.

3. AIR QUALITY IN SWALE

The UK parliament passed the UK Environment Act (1995, updated 2022) which requires local authorities to undertake routine assessment of the quality of their air. To support compliance with this objective, the UK government also introduced the Local Air Quality Management (LAQM) framework to ensure that local authorities undertake this assessment, and that action is undertaken when measured concentrations of air pollutant are above threshold values set in its Air Quality Standards regulation.

In accordance with this framework SBC has established an air quality monitoring network to monitor concentrations of pollutants at locations in the borough where citizens are most likely to experience prolonged exposure to elevated pollutant concentrations.

The data collected by this monitoring network identified that concentrations of Nitrogen Dioxide (NO₂) along East Street in Sittingbourne and London Road in Teynham exceeded the standard set in the regulations for annual mean NO₂ concentrations (40µg/m³). In response, a further investigation was carried out to fully understand the causes of these elevated concentrations and a plan was drawn up to bring NO₂ concentrations into compliance.

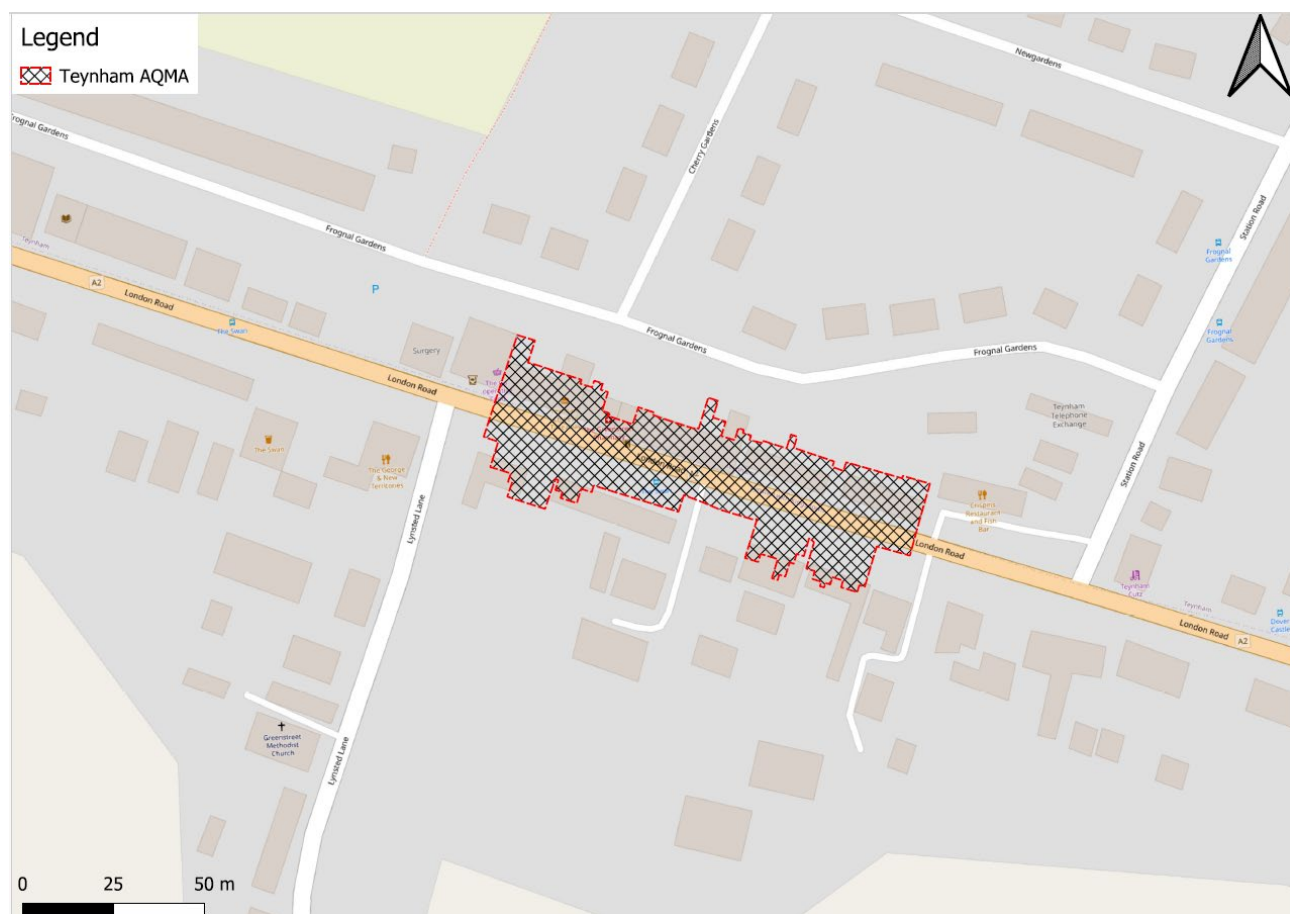
As a result, part of the street in each location was declared as an Air Quality Management Area (AQMA) in recognition of the problem in 2013 (Sittingbourne) and 2015 (Teynham). These AQMAs are illustrated in Figure 3-1 and Figure 3-2.

Figure 3-1: Sittingbourne AQMA



Contains map data © OpenStreetMap and contributors

Figure 3-2: Teynham AQMA



Contains map data © OpenStreetMap and contributors

Trends in monitored concentrations in Sittingbourne and Teynham are presented in Figure 3-1 and Figure 3-2, respectively. Actions implemented by SBC to bring the AQMAs into compliance with the standard have been successful. Measurements from monitoring sites in the AQMAs show a long-term reduction in NO₂ concentrations, with short-term increases in 2021 and 2022 due to increases in traffic relative to the exceptionally low traffic in 2020.

As a result, annual mean concentrations of NO₂ measured within both AQMAs have been compliant with the Air Quality Standard since 2019. Annual mean concentrations have been below 90% of the Air Quality Objective at all locations since 2019, and at all but SW56 and SW80 since 2018.

Figure 3-1: Sampled NO₂ concentrations within the East Street Sittingbourne AQMA (2018 – 2022)

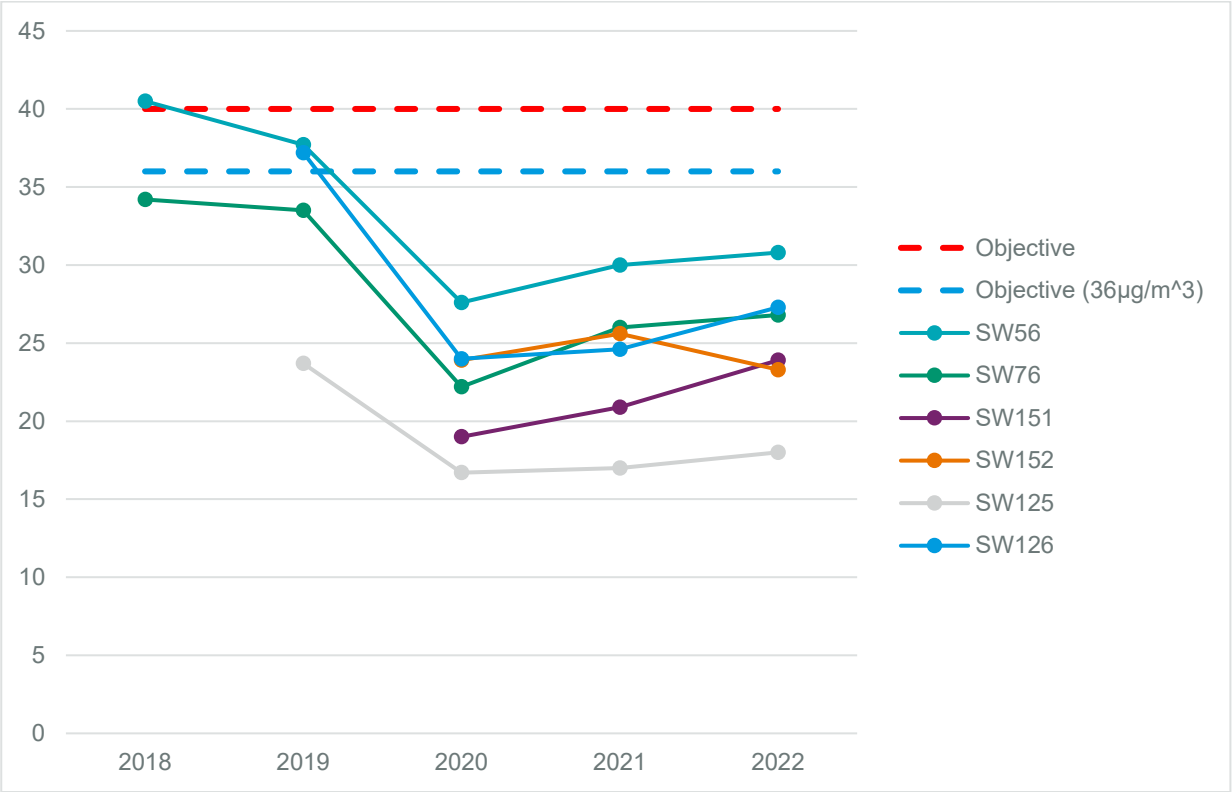
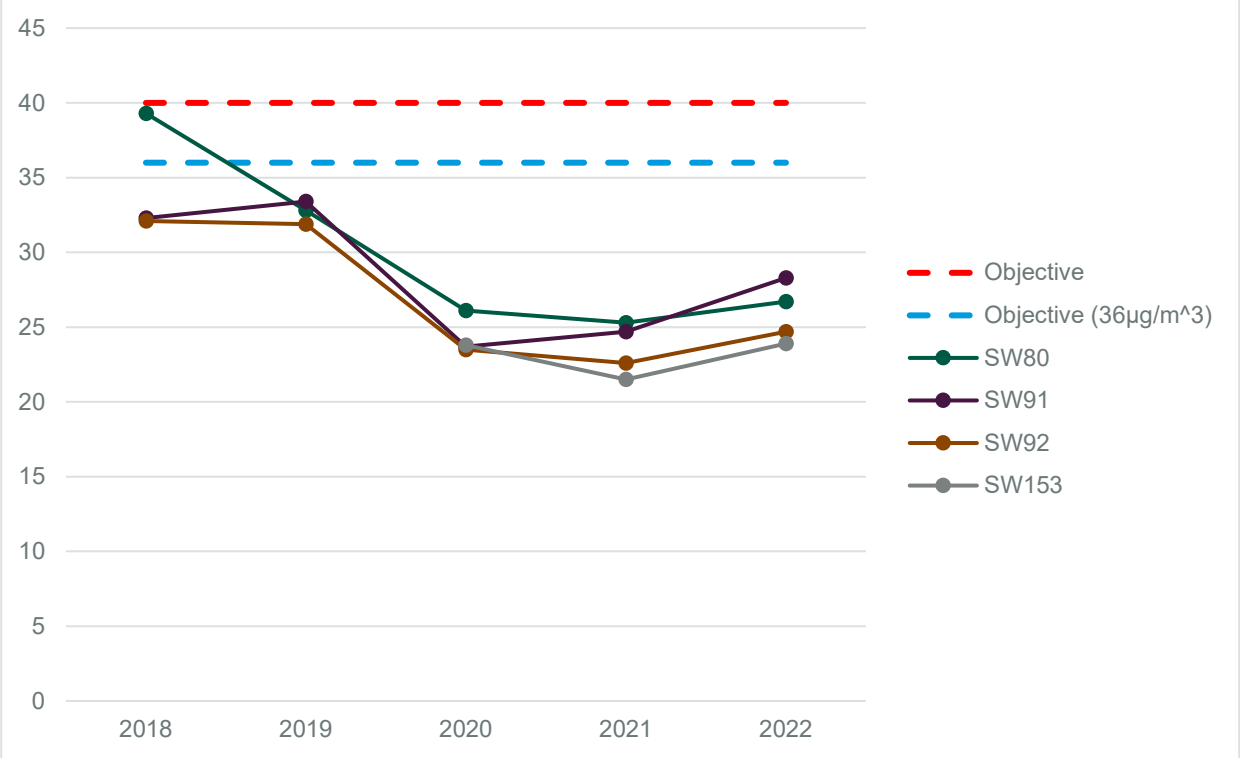


Figure 3-2: Sampled NO₂ concentrations within the Teynham AQMA (2018 – 2022)



4. AIR QUALITY MODELLING

4.1 OVERALL APPROACH

The modelling was carried out following best practice techniques detailed in LAQM Technical Guidance¹ and model guidance published by model developers.

Air pollutant concentrations were modelled for a baseline year of 2022 to assess current public exposure to NO₂ concentrations. Ratified measurements from diffusion tubes in and adjacent to the AQMAs were compared to the modelled concentrations at each location; this process is called model verification and is summarised in Section 6.

Once the model was confirmed to be performing adequately, the verified model was then used to predict concentrations at sensitive receptors in and around the Swale AQMAs.

In order to demonstrate the robustness of compliance in future years, modelling was also carried out for a 2030 future scenario. This scenario was modelled as a 'worst case' scenario, including predicted traffic from future developments up to 2030 while assuming that the local vehicle fleet is lags 2 years behind national projections in terms of emissions technology.

4.2 CHOICE OF MODEL

The latest version of ADMS-Roads (5.1), a dispersion model developed by Cambridge Environmental Research Consultants (CERC), was selected as the most appropriate tool for undertaking this study. This is an internationally recognised model that is widely used in assessments for Local Authorities in the UK.

CERC have carried out extensive validation of the ADMS models by comparing modelled results with standard field, laboratory and numerical data sets, participating in EU workshops on short range dispersion models, comparing data between UK M4 and M25 motorway field monitoring data, carrying out comparison studies on behalf of local authorities and Defra.

ADMS-Roads includes advanced features for treatment of street canyons and other road geometry.

4.3 MODEL DOMAINS

Figure 4-1 and Figure 4-2 show the chosen study areas of the model. These areas were selected to include all major road sources in Sittingbourne and Teynham. The model domain for Sittingbourne extends beyond the intersection of St Michael's Road with Crown Quay Lane and includes the intersection of East Street with the High Street. The model domain for Teynham accounts for incoming traffic on London Road and Lynsted Lane to Teynham.

¹ <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

Figure 4-1: Model domain for Sittingbourne

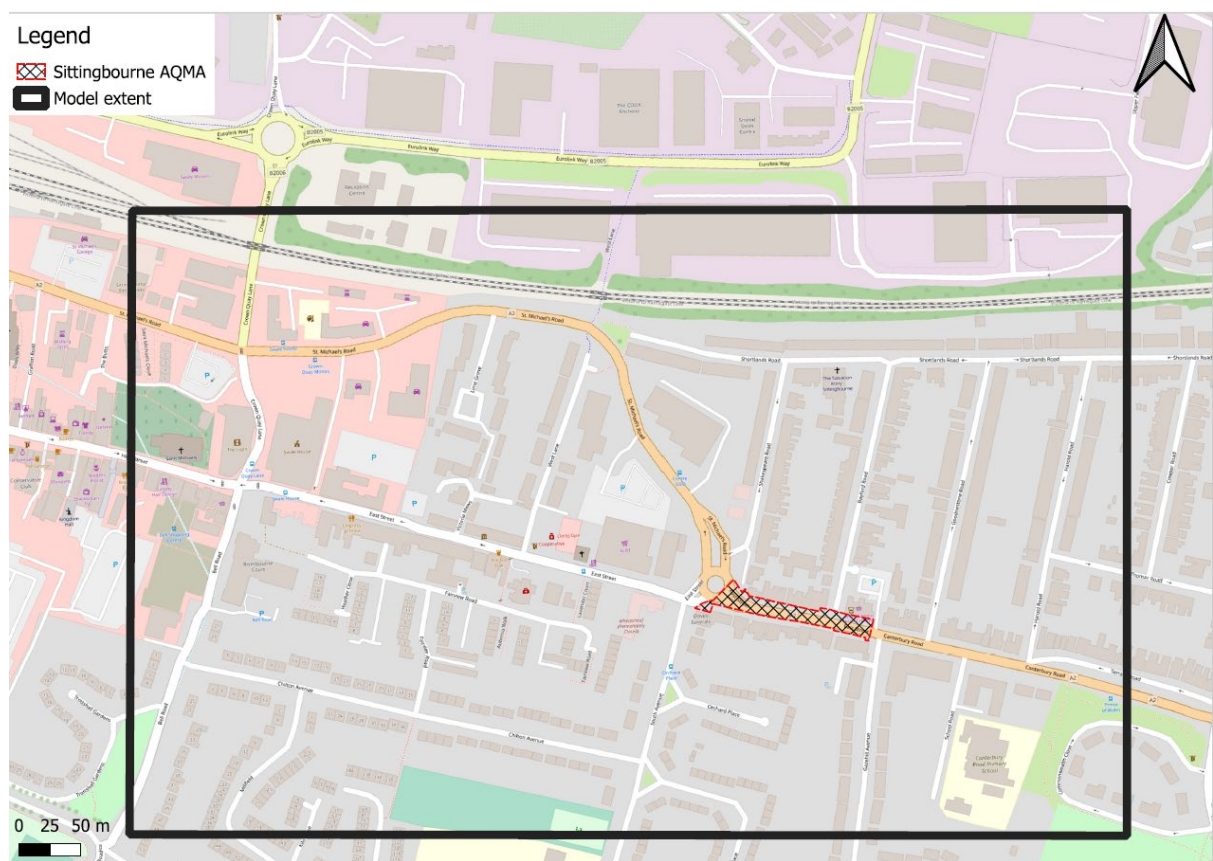
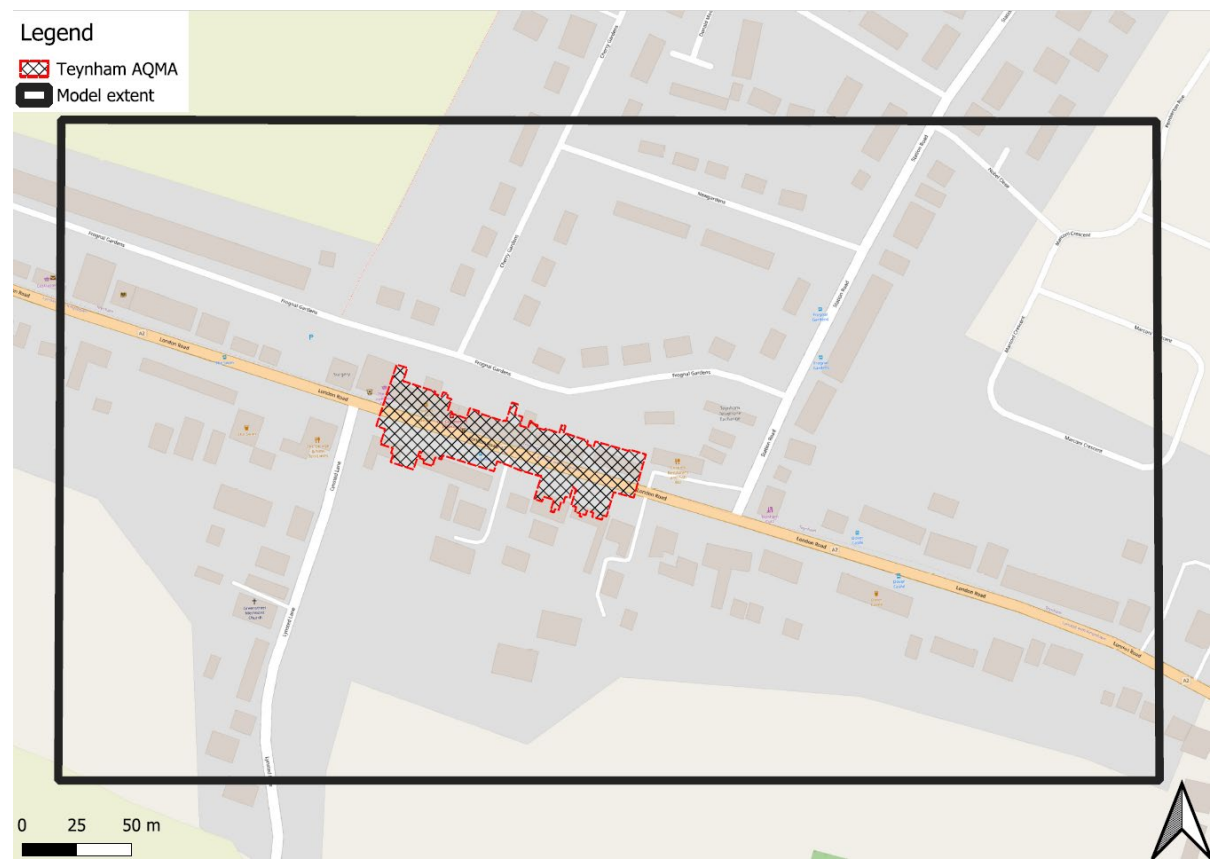


Figure 4-2: Model domain for Teynham



4.4 SENSITIVE RECEPTORS

In each AQMA, the closest point on each building façade to the nearest road was included in the model to capture worst-case concentrations at sensitive receptors.

4.4.1 Sittingbourne AQMA

Figure 4-3 presents the locations of the modelled sensitive receptors in the Sittingbourne AQMA; Table 4-1 provides the exact locations of the receptors. All receptors were modelled at ground level to capture worst case concentrations.

Figure 4-3: Location of modelled sensitive receptors in Sittingbourne



Table 4-1: Sensitive receptor locations, Sittingbourne

ID	Address	X coordinate	Y coordinate	Height (m)
1	151 East Street	591397.7	163489.7	0
2	153 East Street	591411.1	163486.9	0
3	157 East Street	591420.5	163484.9	0
4	155 East Street	591415.1	163486	0
5	159 East Street	591425.5	163483.9	0
6	161a East Street	591431.2	163482.6	0
7	163 East Street	591435.6	163481.6	0
8	165 East Street	591439.5	163480.9	0
9	167a East Street	591443.8	163479.9	0
10	169 East Street	591448.3	163478.8	0

ID	Address	X coordinate	Y coordinate	Height (m)
11	171 East Street	591452.5	163477.9	0
12	Magic Wok	591458.3	163480	0
13	1 Canterbury Road	591483.9	163473.9	0
14	Adriana's Nails	591490.6	163455.9	0
15	Canterbury Court	591480.9	163458.4	0
16	7 Canterbury Road	591472.7	163460.3	0
17	132B East Street	591464.4	163463.1	0
18	130 East Street	591459.4	163463.8	0
19	128 East Street	591454.9	163464.7	0
20	126 East Street	591451.6	163465.6	0
21	124 East Street	591444.9	163467	0
22	122 East Street	591436.9	163466.1	0
23	120A East Street	591429.8	163466.8	0
24	118, Eastleigh House, East Street	591419.8	163468.7	0
25	116 East Street	591410.5	163470.2	0
26	114 East Street	591405.2	163471.3	0
27	112 East Street	591395.8	163473.5	0
28	110 East Street	591390.9	163474.4	0
29	108 East Street	591380.6	163476.7	0
30	106 East Street	591373.8	163478.3	0
31	104 East Street	591369.7	163479	0
32	Doves Funeral Directors	591361.1	163477.8	0

4.4.2 Teynham AQMA

Figure 4-4 presents the locations of the modelled sensitive receptors in the Sittingbourne AQMA; Table 4-2 provides the exact locations of the receptors. All receptors were modelled at ground level to capture worst case concentrations.

Figure 4-4: Location of modelled sensitive receptors in Teynham

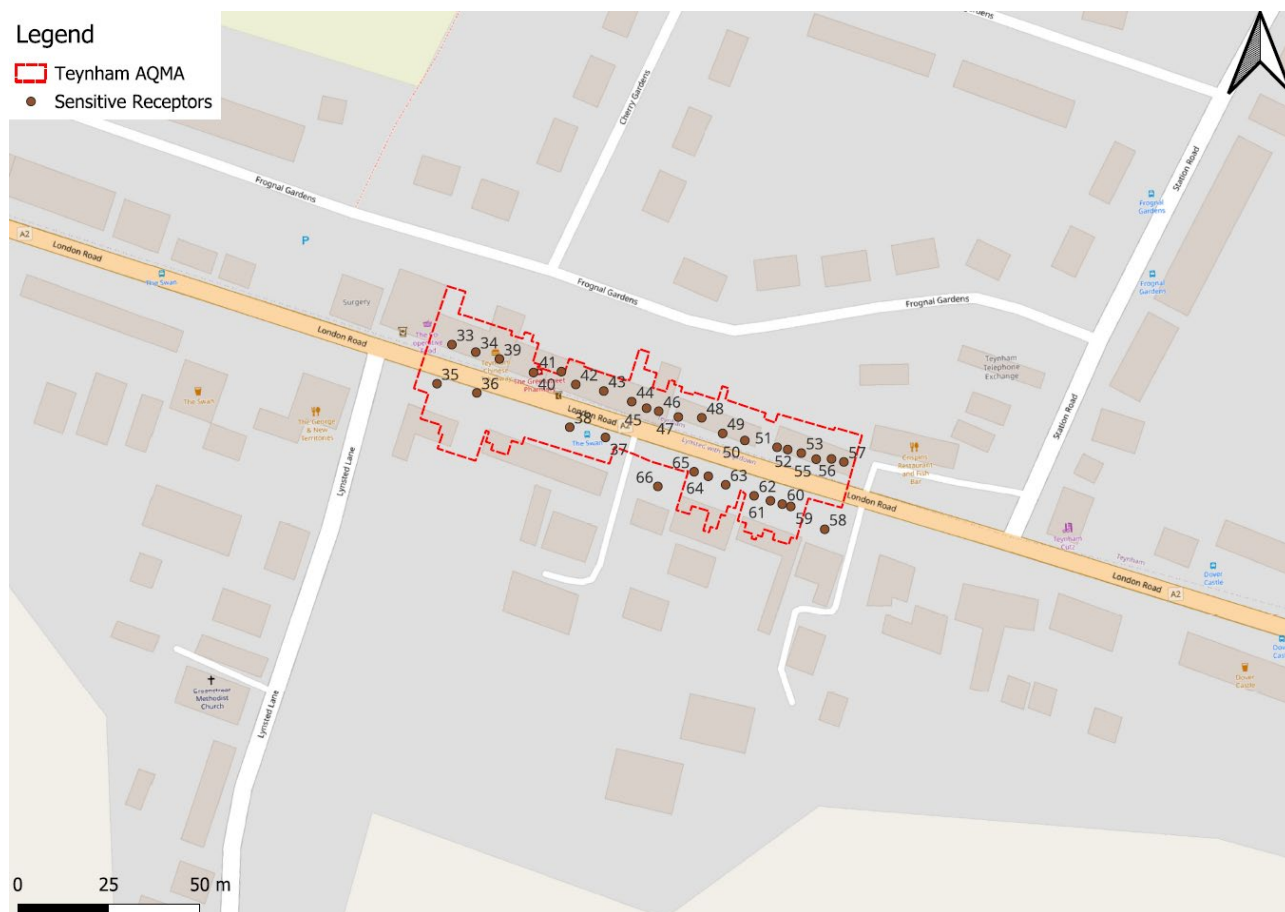


Table 4-2: Sensitive receptor locations, Teynham

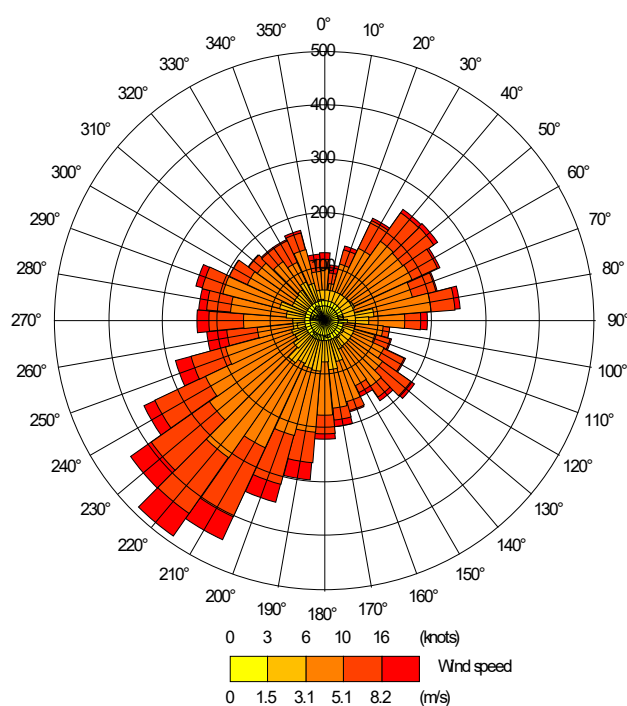
ID	Address	X coordinate	Y coordinate	Height (m)
33	LTR Supplies, London Road	595154.8	162473	0
34	Denture Centre, London Road	595161.3	162471	0
35	72 London Road	595150.7	162462.3	0
36	70 London Road	595161.6	162459.8	0
37	FJ Williams Joinery & Carpentry	595197	162447.6	0
38	68 London Road	595187.1	162450.4	0
39	Teynham C Chinese	595167.8	162469.1	0
40	The Greenstreet Pharmacy	595177.2	162465.4	0
41	103 London Road	595184.9	162465.6	0
42	101 London Road	595188.8	162462.1	0
43	99 London Road	595196.5	162460.3	0
44	97 London Road	595204.2	162457.4	0
45	95 London Road	595208.2	162455.6	0
46	93 London Road	595211.6	162454.8	0

ID	Address	X coordinate	Y coordinate	Height (m)
47	91A London Road	595217	162453.2	0
48	91B London Road	595223.4	162453	0
49	89 London Road	595229.2	162448.7	0
50	87 London Road	595235.2	162446.7	0
51	85 London Road	595244.1	162444.9	0
52	83 London Road	595247	162444.2	0
53	81 London Road	595250.7	162443.3	0
55	79 London Road	595254.8	162441.6	0
56	77 London Road	595259.1	162441.7	0
57	75 London Road	595262.4	162440.8	0
58	42 London Road	595257.2	162422.4	0
59	44 London Road	595247.8	162428.6	0
60	46 London Road	595245.5	162429.3	0
61	48 London Road	595242.3	162430.2	0
62	50 London Road	595237.8	162431.5	0
63	52 London Road	595230	162434.6	0
64	54 London Road	595225.2	162436.9	0
65	54A London Road	595221.3	162438.2	0
66	56 London Road	595211.3	162434.1	0

4.5 METEOROLOGY

One year of meteorological data from the Met Office Manston Airfield site was used in this study. Missing data was filled in with information from the nearby London Gatwick and Southend met stations. A wind rose for the filled Manston 2022 dataset is presented in Figure 4-5.

Figure 4-5: Windrose of meteorological data collected at Manston Airfield during 2022



4.6 SURFACE ROUGHNESS

In ADMS-Roads, a length scale parameter called the surface roughness length is used to characterise the study area in terms of its effects on wind speed and turbulence. The modelling used a surface roughness length of 0.5m in both Sittingbourne and Teynham, to represent a moderately built-up area.

The difference in land use at the meteorological site and the model domain was accounted for by using a surface roughness of 0.2m for the meteorological site.

4.7 CHEMISTRY AND BACKGROUND CONCENTRATIONS

The interconversion of NO and NO₂ emissions in the presence of ozone was calculated using the NO_x:NO₂ calculator² published by Defra, following the approach outlined in LAQM.TG (22). Background concentrations were taken from the background maps published by Defra³ for use with this tool. To avoid double-counting, contributions from local primary roads were removed from the background maps. The background concentrations used in this study are presented in Table 4-3.

Table 4-3: Annual mean background concentrations, Sittingbourne and Teynham, 2022.

Pollutant	Background concentration (µg.m ⁻³)
NO _x	14.3
PM ₁₀	15.2
PM _{2.5}	10.1

² <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/nox-to-no2-calculator/>

³ <https://uk-air.defra.gov.uk/data/laqm-background-home>

5. EMISSIONS INVENTORY

The development of the emission inventory for Sittingbourne and Teynham was carried out through the following process:

1. Collation of local traffic flow, speed and queuing data;
2. Collation of national fleet fuel and technology statistics;
3. The traffic and fleet data were combined with emission factors from the most recent version of the Emissions Factors Toolkit (EFT), version 11⁴ to provide total annual emissions of NO_x and PM for the modelled road links.

Further detail on the emissions inventory compilation is provided below.

5.1 TRAFFIC FLOWS AND SPEEDS

5.1.1 2022

A hybrid traffic volume dataset was compiled from data collected by SBC, traffic models developed by SWECO covering both AQMA areas, and from the DfT traffic count network⁵. Traffic flows were provided for vehicle categories including cars, LGVs, HGVs, buses and coaches, and motorcycles. Where detailed vehicle split information was not available, the average vehicle split across other count points in Swale were used. Traffic counts from years other than 2022 were projected to 2022 using national projections from the Temprow.

The traffic flows used in the assessment are summarised in Table 5-1. Traffic speeds were estimated based on council traffic count data, the SWECO modelled data and local knowledge. Speeds were reduced within 30m of major junctions in the model domain following the approach outlined in LAQM.TG (22).

Table 5-1: Modelled traffic flows, 2022

Route	AQMA	Traffic flows					Speed (km/h)
		AADT	Car	LGV	HGV	Bus	
A2 St Michaels Road (Crown Quay Ln to Aldi)	Sittingbourne	18749	16461	1526	761	18	33
High street (West of Bell Road)	Sittingbourne	1338	1133	131	41	1	15
Crown Quay Road (East St to St Michael's Rd)	Sittingbourne	3860	3512	199	149	4	25
A2 St Michaels Road (Aldi to East St)	Sittingbourne	17825	15974	1180	671	16	20
Bell Road (Avenue of Remembrance to Chilton Ave)	Sittingbourne	10888	9905	725	258	6	18
Crown Quay Road (St Michael's Rd to Eurolink Way)	Sittingbourne	8753	8033	512	208	5	15
East Street (West Ln to St Michael's Rd)	Sittingbourne	1481	1010	252	219	5	25
East Street (West of west lane)	Sittingbourne	1727	1499	121	66	2	15
A2 East Street (St Michael's Rd to Gaze Hill Avenue)	Sittingbourne	21938	19626	1470	841	20	30
A2 East Street (Gaze Hill Ave to Rectory Rd)	Sittingbourne	20773	18548	1392	833	20	30
London Road (Flaxfield to Lynsted Ln/Flaxfield Rd to Frogna Lane)	Teynham	16444	14302	1260	881	21	40
London Road (Lynsted Ln to Station Rd)	Teynham	16067	13919	1283	864	21	40
London Road (Station Rd to Lewson Street)	Teynham	15937	13577	1434	926	22	40

⁴ <https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html>. Version 12 was published following the conclusion of this study; a sensitivity test into the effects of using version 12 is provided in Section 8.

⁵ <https://roadtraffic.dft.gov.uk>

5.1.2 2028

A review of currently committed developments in Swale which may lead to increased traffic flows along the A2 was carried out to quantify maximum potential increases in traffic across the road network.

For the 2028 scenario, 11,170 vehicles were added onto each road link, with the assumption that every committed development within the area would be completed, with an additional 500 vehicles to represent potential uncertainty in predictions of traffic generation from future developments.

To account for the changes in speeds with the additional traffic flows, speeds were additionally reduced by 5km.h⁻¹ along each road modelled for the future scenario.

5.2 EMISSION FACTORS

Emissions from all modelled road traffic sources were calculated using speed-dependent vehicle emission factors for NO_x, primary NO₂, and particulates from the Emissions Factors Toolkit (EFT) version 11¹¹. These factors provide emission factors categorised by vehicle size, age, and Euro classification, taking into account average vehicle mileage and engine degradation. Emission factors are provided for roads with uphill or downhill gradients.

5.3 VEHICLE FLEET COMPOSITION

5.3.1 2022

National projections provided by the EFT were used as a data source for vehicle composition. Table 5-2 and Table 5-3 present the derived fleet age split in 2022.

Table 5-2: Fleet age splits for 2022, light vehicles

Region	Vehicle type	Pre-Euro 1	Euro 1	Euro 2	Euro 3	Euro 4	Euro 5	Euro 6	Euro 6c	Euro 6d
National average	Petrol Car	-	-	-	1%	6%	19%	13%	62%	-
	Diesel Car	-	-	-	1%	5%	28%	17%	24%	24%
	Petrol LGV	-	-	-	2%	6%	18%	14%	60%	-
	Diesel LGV	-	-	-	1%	5%	19%	13%	29%	33%
	Full Hybrid Petrol Car	-	-	-	0%	1%	7%	6%	86%	-
	Plugin Hybrid Petrol Car	-	-	-	-	-	2%	6%	93%	-
	Full Diesel Hybrid Car	-	-	-	-	-	2%	3%	24%	71%

Table 5-3: Fleet age splits for 2022, heavy vehicles

Region	Vehicle type	Pre-Euro I	Euro I	Euro II	Euro III	Euro IV	Euro V EGR	Euro V SCR	Euro VI
National average	Rigid HGV	0%	0%	0%	1%	2%	2%	7%	88%
	Artic HGV	0%	0%	0%	0%	0%	1%	3%	96%
	Buses / Coaches	0%	0%	0%	4%	3%	4%	11%	77%

5.3.2 2028

As for 2022, National projections provided with the EFT were used as a data source for vehicle composition. Table 5-4 and Table 5-5 present the derived fleet age split in 2028 for light and heavy vehicles, respectively.

Table 5-4: Fleet age splits for 2028, light vehicles

Region	Vehicle type	Pre-Euro 1	Euro 1	Euro 2	Euro 3	Euro 4	Euro 5	Euro 6	Euro 6c	Euro 6d
National average	Petrol Car	-	-	-	-	< 1%	3%	5%	92%	-
	Diesel Car	-	-	-	-	< 1%	6%	8%	16%	69%

Region	Vehicle type	Pre-Euro 1	Euro 1	Euro 2	Euro 3	Euro 4	Euro 5	Euro 6	Euro 6c	Euro 6d
	Petrol LGV	-	-	-	-	< 1%	1%	1%	97%	
	Diesel LGV	-	-	-	-	< 1%	4%	5%	13%	78%
	Full Hybrid Petrol Car	-	-	-	-	-	< 1%	1%	8%	92%
	Plugin Hybrid Petrol Car	-	-	-	-	-	< 1%	1%	99%	-
	Full Diesel Hybrid Car	-	-	-	-	-	< 1%	1%	8%	92%

Table 5-5: Fleet age splits for 2028, heavy vehicles

Region	Vehicle type	Pre-Euro I	Euro I	Euro II	Euro III	Euro IV	Euro V EGR	Euro V SCR	Euro VI
National average	Rigid HGV	-	-	-	-	< 1%	< 1%	1%	99%
	Artic HGV	-	-	-	-	< 1%	< 1%	< 1%	100%
	Buses / Coaches	-	-	-	-	< 1%	1%	3%	96%

5.4 TIME-VARYING EMISSION FACTORS

The variation of traffic flow during the day has been taken into account by applying national average diurnal profiles published by the Department for Transport⁶ to the road emissions.

⁶ <https://www.gov.uk/government/statistical-data-sets/road-traffic-statistics-tra>

6. MODEL ADJUSTMENT AND VERIFICATION

Once the base year model has been developed it is verified against monitoring data and adjusted to ensure the best possible fit between modelled and real-world concentrations, following the approach outlined in the LAQM Technical Guidance. Following this guidance, the adjustment process is carried out for NO_x (NO and NO₂) as NO and NO₂ interconvert in the atmosphere following emission from vehicle exhausts in a non-linear fashion.

The derived adjustment factor is then applied to road emissions in all modelled scenarios. Following this adjustment, model verification is carried out by comparing the total predicted NO₂ concentrations against the measured NO₂ concentrations.

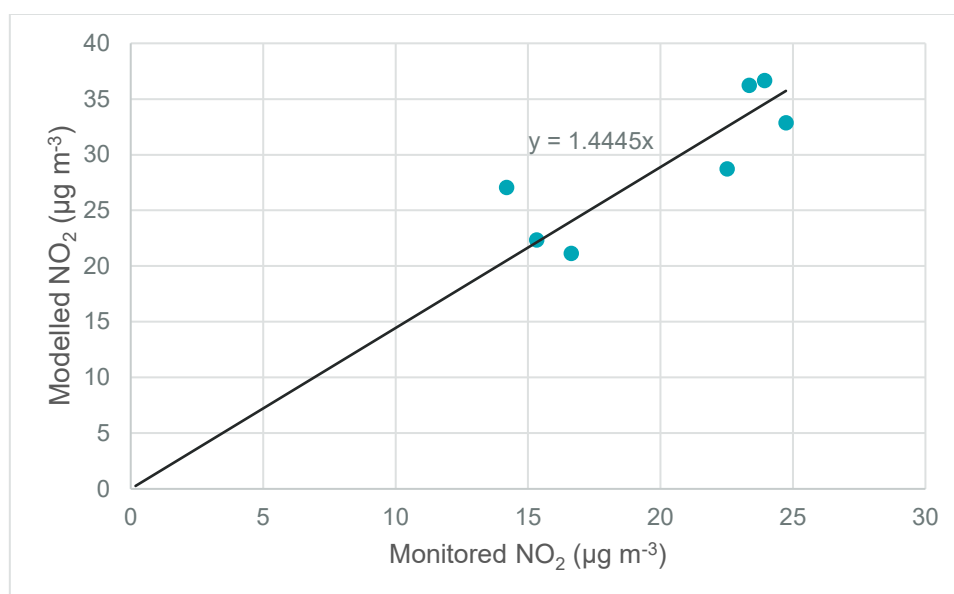
A total of 7 monitoring locations located within the study area were used for model verification.

Following an initial model verification step, iterative improvements were made to the model to improve model performance in areas where the model was not accurately predicting real-world concentrations. These improvements included refinements to road geometry and street canyon locations in order to more closely reflect real-world dispersion conditions.

6.1 MODEL CALIBRATION AND ADJUSTMENT

Figure 6-1 shows model performance at locations where measurements were collected in 2022.

Figure 6-1: Measured and modelled annual mean road NO_x contributions at monitoring sites, 2022, $\mu\text{g.m}^{-3}$



A model adjustment factor was derived following the approach outlined in LAQM.TG (22). Following this approach, an adjustment factor of 1.44 was used for annual mean NO_x concentrations.

6.2 MODEL VERIFICATION

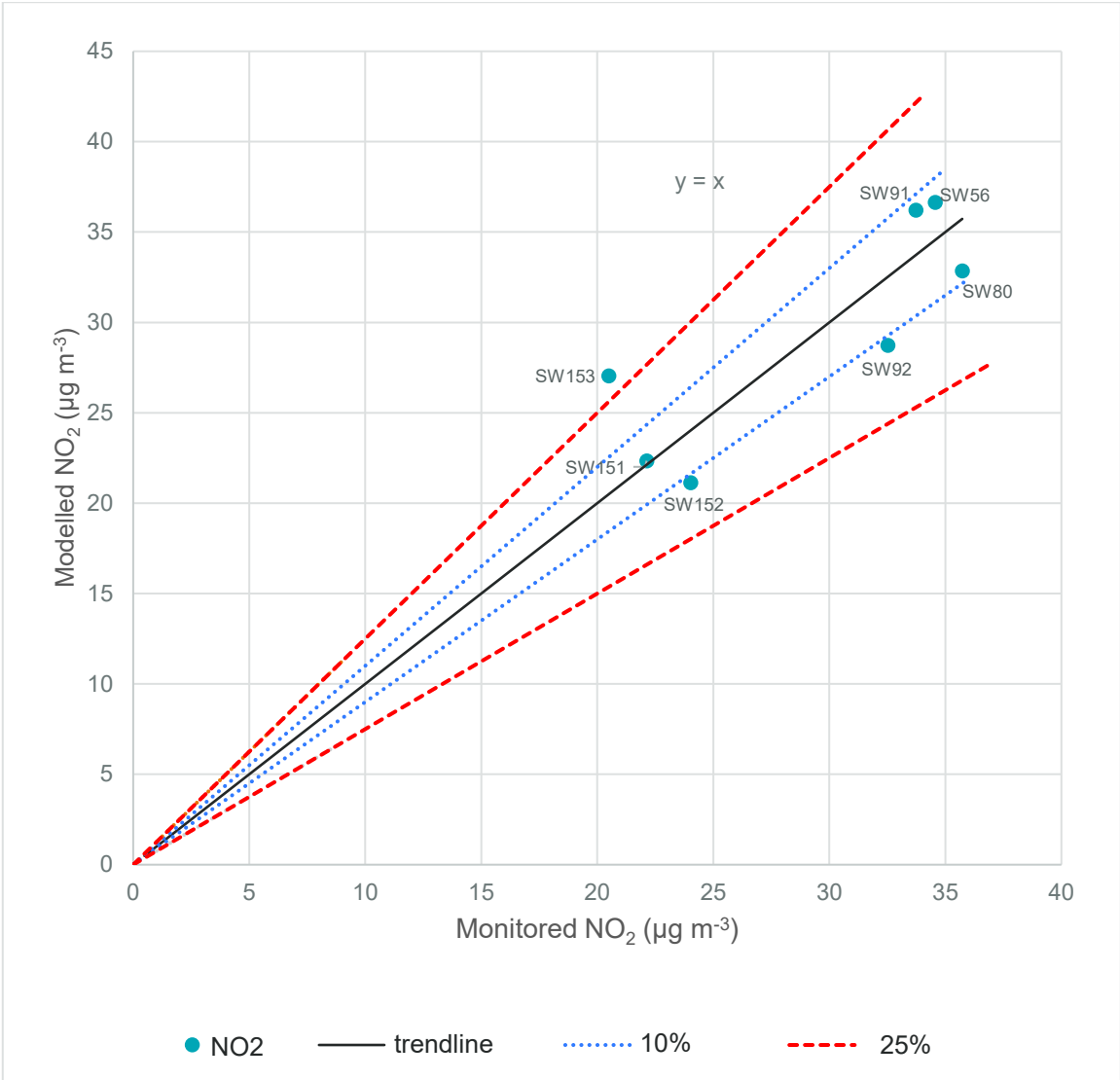
Figure 6-2 presents the model performance with respect to adjusted modelled NO₂ at monitoring locations in 2022. If the model perfectly predicted concentrations at every monitoring location, all concentrations would lie on the “y=x” trendline, plotted in black in the figure. Locations where the model prediction is within 10% of the monitored concentration lie within the blue lines, and locations where the model prediction is within 25% of the monitored concentration lie within the red lines on the figure.

The model performs within the 25% acceptable threshold for model performance across all monitoring locations except for SW153, where the model overpredicts concentrations and therefore provides a conservative estimate of potential exposure to poor air quality. SW153 is not located within either of the two AQMAs.

The model performs within the ideal 10% threshold across most sites, including at the locations of maximum predicted concentrations across the two AQMAs. This gives confidence that the model is correctly predicting worst-case human exposure across the two areas.

Model performance was evaluated using the Root Mean Square Error, following LAQM.TG (22). The RMSE for this study is 3.5 $\mu\text{g.m}^{-3}$, within the 4 $\mu\text{g.m}^{-3}$ ideal threshold identified in the guidance, demonstrating that the model performs well and lending confidence to model predictions of concentrations across the model domain.

Figure 6-2: Measured and modelled annual mean road NO₂ contributions at monitoring sites, 2022, $\mu\text{g.m}^{-3}$



7. RESULTS

The model described above was used to predict annual mean NO₂ concentrations at buildings within and around the AQMA at sensitive receptors and across a grid of receptors covering the domain described in Section 3.2.

7.1 SITTINGBOURNE AQMA

Table 7-1 presents modelled annual mean NO₂ concentrations in 2022 and 2028 at the sensitive receptors in the Sittingbourne AQMA described in Section 4.3.

No location is predicted to exceed the Air Quality Objective for annual mean NO₂ concentrations in either modelled baseline scenario. Furthermore, concentrations are more than 10% below the objective at all receptors. The maximum predicted concentrations occur near junctions in Sittingbourne.

No exceedances of the objective are predicted to occur at any receptors in 2028, demonstrating that there is substantial headroom to account for potential uncertainty in traffic flows and vehicle fleet composition in future years. The effect of the increase in traffic flows along the road network is partly balanced out by the projected improvement in average emissions from vehicles as engine technology improves and older, more polluting vehicles fall into disuse.

As a result, compliance is highly likely to be maintained in the future.

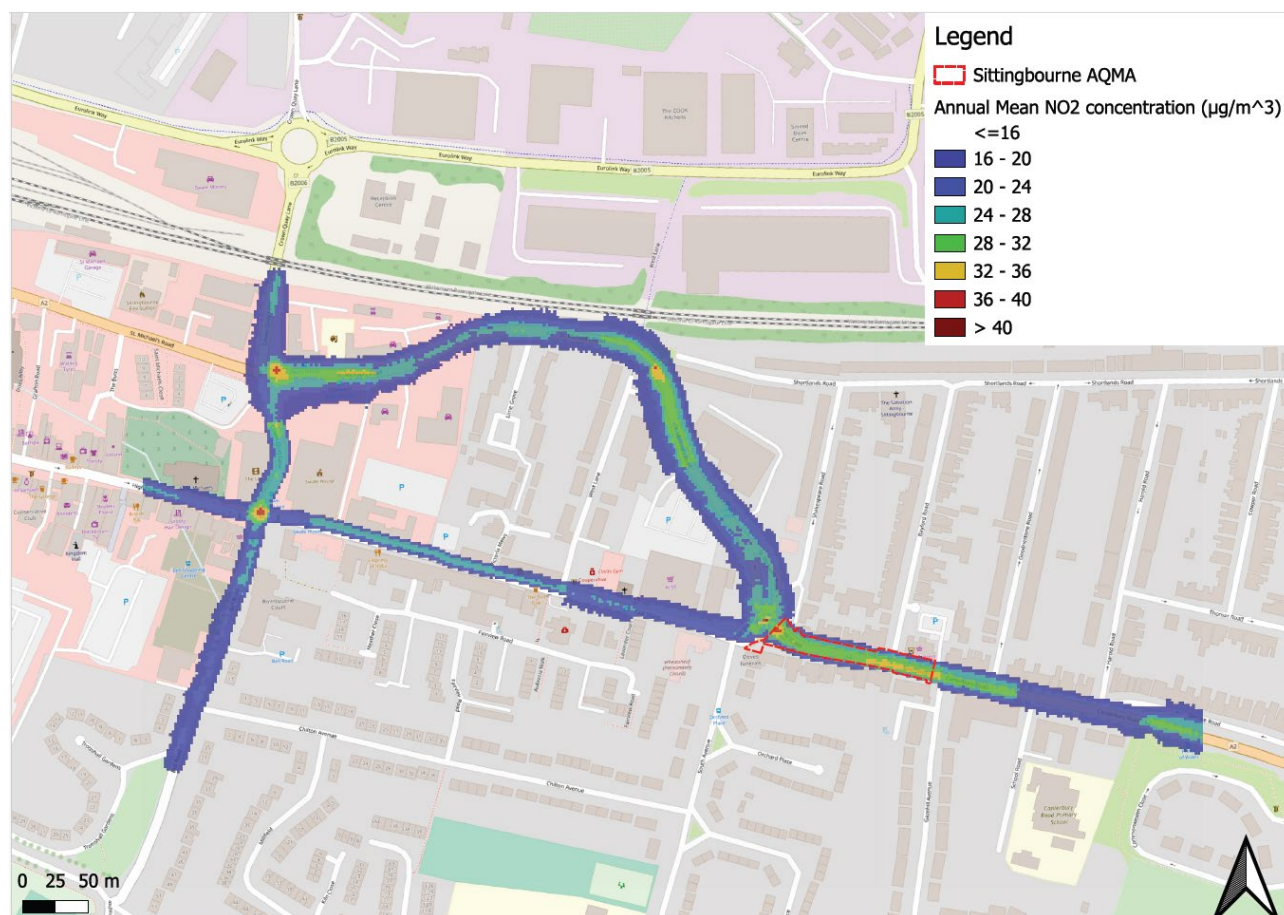
Table 7-1: Annual average NO₂ concentrations at sensitive receptors in the Sittingbourne AQMA, µg.m⁻³. For comparison with the Air Quality Objective of 40 µg.m⁻³.

Receptor ID	Address	Annual Mean NO ₂ (µg.m ⁻³)	
		2022 Baseline	2028
1	151 East Street	26.2	26.9
2	153 East Street	25.4	25.8
3	157 East Street	25.7	25.9
4	155 East Street	25.5	25.8
5	159 East Street	25.7	25.9
6	161a East Street	26.0	26.2
7	163 East Street	26.1	26.4
8	165 East Street	26.1	26.3
9	167a East Street	26.3	26.5
10	169 East Street	27.0	27.3
11	171 East Street	27.0	27.3
12	Magic Wok	25.6	25.8
13	1 Canterbury Road	25.7	25.8
14	Adriana's Nails	29.7	30.1
15	Canterbury Court	29.7	30.2
16	7 Canterbury Road	29.6	30.1
17	132B East Street	31.0	31.6
18	130 East Street	30.5	31.1
19	128 East Street	30.4	31.0
20	126 East Street	30.6	31.2
21	124 East Street	30.5	31.1
22	122 East Street	25.0	25.0
23	120A East Street	24.4	24.5
24	118, Eastleigh House, East Street	24.3	24.3
25	116 East Street	24.0	24.1

Receptor ID	Address	Annual Mean NO ₂ (µg.m ⁻³)	
		2022 Baseline	2028
26	114 East Street	24.0	24.1
27	112 East Street	24.0	24.1
28	110 East Street	24.5	24.8
29	108 East Street	14.8	14.5
30	106 East Street	14.7	14.3
31	104 East Street	15.6	15.5
32	Doves Funeral Directors	13.8	13.3

Figure 7-1 presents annual mean NO₂ concentrations in the Sittingbourne AQMA in the 2028 scenario. Annual average NO₂ concentrations (µg/m³) are predicted to be more than 10% below the UK Air Quality Objective of 40 µg/m³ at all locations of relevant exposure in the AQMA and across the rest of the road network in Sittingbourne.

Figure 7-1: Predicted annual mean NO₂ concentrations, Sittingbourne, 2028, µg.m⁻³



7.2 TEYNHAM AQMA

Table 7-2 presents modelled annual mean NO₂ concentrations in 2022 and 2028 at the sensitive receptors in the Teynham AQMA described in Section 4.3. Concentrations at all relevant receptors within the AQMA are more than 10% below the Air Quality Objective for annual mean NO₂ concentrations.

As for the Sittingbourne AQMA, no exceedances of the objective are predicted to occur at any receptors in 2028, demonstrating that there is substantial headroom to account for potential uncertainty in traffic flows and vehicle fleet composition in future years.

As a result, compliance is highly likely to be maintained in the future.

Table 7-2: Annual average NO₂ concentrations at sensitive receptors in the Teynham AQMA, µg.m⁻³. For comparison with the Air Quality Objective of 40 µg.m⁻³.

Receptor ID	Address	Annual Mean NO ₂ (µg.m ⁻³)	
		2022 Baseline	2028
33	LTR Supplies, London Road	26.0	26.6
34	Denture Centre, London Road	25.9	26.5
35	72 London Road	26.9	27.6
36	70 London Road	28.1	29.0
37	FJ Williams Joinery & Carpentry	26.2	26.9
38	68 London Road	25.9	26.6
39	Teynham C Chinese	25.6	26.2
40	The Greenstreet Pharmacy	26.3	27.0
41	103 London Road	26.0	26.7
42	101 London Road	25.7	26.4
43	99 London Road	25.9	26.6
44	97 London Road	25.5	26.1
45	95 London Road	26.1	26.8
46	93 London Road	25.8	26.5
47	91A London Road	25.6	26.3
48	91B London Road	26.1	26.8
49	89 London Road	26.5	27.2
50	87 London Road	26.6	27.3
51	85 London Road	25.2	25.9
52	83 London Road	25.8	26.5
53	81 London Road	26.0	26.7
55	79 London Road	26.1	26.8
56	77 London Road	26.1	26.8
57	75 London Road	25.9	26.6
58	42 London Road	24.9	25.5
59	44 London Road	24.9	25.6
60	46 London Road	24.9	25.5
61	48 London Road	24.7	25.3
62	50 London Road	25.1	25.8
63	52 London Road	25.3	26.0
64	54 London Road	24.8	25.4
65	54A London Road	24.9	25.5
66	56 London Road	25.0	25.6

Figure 7-2 presents annual mean NO₂ concentrations in the Teynham AQMA in the 2028 scenario. Annual average NO₂ concentrations (µg/m³) are predicted to be more than 10% below the UK Air Quality Objective of 40 µg/m³ at all locations of relevant exposure in Teynham.

Figure 7-2: Predicted annual mean NO₂ concentrations, Teynham, 2028, µg.m⁻³



8. SENSITIVITY TESTING

In order to quantify and reduce uncertainty around key model inputs, sensitivity testing was carried out to assess the impact of:

- The impact of a 2-year delay to fleet renewal in Swale relative to national projections. This assumption reflects potentially reduced rates of purchase of new vehicles in 2020 and 2021.
- The use of version 12 of the Emission Factor Toolkit, which was published after completion of the modelling presented in this report.

The results of the sensitivity testing are presented below.

8.1 FLEET RENEWAL DELAY

The impact of slower than expected replacement of older vehicles in the fleet during 2020 and 2021 was assessed by running the 2022 baseline model using the fleet for 2020 from the national projections published by Defra. The fleet split for 2020 is presented in Tables 8-1 and 8-2 for light and heavy vehicles respectively.

Table 8-1: Fleet age splits for 2020, light vehicles

Region	Vehicle type	Pre-Euro 1	Euro 1	Euro 2	Euro 3	Euro 4	Euro 5	Euro 6	Euro 6c	Euro 6d
National average	Petrol Car	-	-	0%	3%	11%	25%	15%	46%	-
	Diesel Car	-	-	0%	1%	9%	33%	19%	27%	8%
	Petrol LGV	-	-	1%	4%	12%	27%	17%	44%	-
	Diesel LGV	-	-	0%	2%	10%	26%	17%	45%	-
	Full Hybrid Petrol Car	-	-	-	0%	3%	12%	09%	76%	-
	Plugin Hybrid Petrol Car	-	-	-	-	-	5%	17%	79%	-
	Full Diesel Hybrid Car	-	-	-	-	-	3%	6%	48%	43%

Table 8-2: Fleet age splits for 2020, heavy vehicles

Region	Vehicle type	Pre-Euro I	Euro I	Euro II	Euro III	Euro IV	Euro V EGR	Euro V SCR	Euro VI
National average	Rigid HGV	-	-	0%	3%	3%	4%	11%	78%
	Artic HGV	-	-	0%	0%	1%	2%	7%	90%
	Buses / Coaches	-	-	1%	7%	5%	6%	17%	64%

The results of the sensitivity test are presented in Table 8-3, which shows the maximum predicted concentration at a sensitive receptor in each AQMA in the baseline and fleet delay scenarios. A 2-year delay to fleet renewal is not predicted to lead to maximum predicted concentrations in either AQMA exceeding the Air Quality Objective of 40 $\mu\text{g.m}^{-3}$.

Table 8-3: Maximum predicted concentrations at sensitive receptors in each AQMA in the 2022 baseline and 2-year fleet delay sensitivity test scenarios, $\mu\text{g.m}^{-3}$

AQMA	Maximum predicted annual mean NO ₂ concentration across all relevant receptors, $\mu\text{g.m}^{-3}$	
	2022 baseline	2022 "2-year fleet delay" test
Sittingbourne	31.0	32.4
Teynham	28.1	30.0

8.2 EMISSIONS FACTORS TOOLKIT VERSION 12

Following completion of the modelling process, a new version of the Emissions Factors Toolkits, version 12 (as opposed to version 11 which was used in the original modelling), was published by Defra and the devolved administrations. This updated tool includes use of the COPERT v5.6 NO_x and PM speed-based emissions factors, updated from COPERT v5.3, as taken from the European Environmental Agency (EEA) emission calculation tool.

An emissions sensitivity test was carried out to assess the impact of using these new factors in the 2028 scenario. Using the updated emissions factors in the EFT v12 was found to reduce predicted emissions across major roads in 2028; as a result, the current assessment presents a worst-case assessment of concentrations in the AQMAs in future years.

9. CONCLUSIONS

Annual mean concentrations of NO₂ measured by monitors in and around two Swale Air Quality Management Areas (AQMA) for Teynham (AQMA 5) and East Street Sittingbourne (AQMA 3) have been consistently below the government Air Quality Objective for five and four years, respectively. Defra have expressly indicated to Swale that both AQMAs should begin the process of revocation in their feedback of the 2022 and 2023 Annual Status Reports.

To ensure that any decisions are made on robust evidence, Swale continued to monitor air quality for an additional year (2023) and commissioned Ricardo to carry out a Detailed Assessment of NO₂ concentrations in the AQMAs, considering the future committed developments that could impact air quality in these areas.

Modelling was carried out for two years:

1. a 2022 baseline, using traffic data provided by the Council, SWECO and national forecasts for the vehicle fleet composition; and
2. a 2028 future scenario considering the impact of future committed developments that could adversely impact concentrations in the AQMAs. This scenario was modelled assuming that all traffic generated by each development would run through the two AQMAs.

Sensitivity testing was also carried out into the potential impact of reduced fleet turnover in Swale relative to national projections.

The model accurately predicts concentrations at monitoring stations in the Swale AQMAs in 2022, demonstrating that the model correctly represents real-world conditions.

The modelling undertaken through this study shows that:

- no location is predicted to exceed the Air Quality Objective for annual mean NO₂ at any location of relevant exposure in 2022.
- no locations are predicted to exceed the Air Quality Objective in 2028.
- a delay to fleet renewal rates will not jeopardise compliance in the AQMA.

Based on the data available, this Detailed Assessment indicates that the Sittingbourne and Teynham AQMAs can be revoked without risk of future exceedances.

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Environment & Climate Change Committee	
Meeting Date	10 July 2025
Report Title	Open Spaces Strategy Update
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Graeme Tuff, Greenspaces Manager
Classification	Open
Recommendations	1. To note the update report

1 Purpose of Report and Executive Summary

- 1.1 Following agreement by Policy and Resource Committee, the Council started work last year on a strategy that encapsulates all the information required to enable the Borough Council to make informed decisions on the provision, management and development of the Borough's Open Spaces. The previous strategy also included a specific section on the provision and maintenance of children's play areas across the Borough. This report updates on that work to date.
- 1.2 The objective of this is to ensure the Borough Council is furnished with an evidence base and resulting strategy document that is compliant with the National Planning Policy Framework.
- 1.3 The Strategy is being developed with the assistance of independent consultants Knight, Kavanagh & Page (KKP) and uses the recommended guidance and methodology to ensure it provides robust evidence to support the Local Plan process.
- 1.4 This update report considers the current position regarding the Open Spaces Strategy and the different typologies, apart from Provision for Children and Young People (Play Provision) which is considered by the Housing, Health and Communities Committee.

2 Background

- 2.1 The new strategy is planned to meet the emerging Local Plan evidence timetable. New updated National Planning Policy Framework and the associated standard method for calculating housing need, has been incorporated to ensure that the strategy will be compliant with this new guidance.
- 2.2 KKP have completed the initial audit having gathered evidence of existing provision and have presented the initial report. However, with the unknown spatial allocations resulting from the Highsted enquiry, it is proposed to pause the second stage of the strategy development pending the outcome and clarity on

where future housing development may be located and how much will be required.

2.3 A total of 416 sites are identified and included in the evidence (includes play areas). The table below provides a breakdown of these.

- Hectares are broadly in keeping with 2017 study.
- There is a noticeable difference in the 2025 current provision level for Parks & Gardens and Natural & Semi-Natural Greenspace provision. This is due to Milton Creek Country Park being included as a park in 2017 but now as a natural/semi-natural greenspace and South Swale Nature Reserve was included as a Natural & Semi-Natural Greenspace site but has now been removed.

Typology	Number of sites 2017	Hectares 2017	Number of sites 2025	Hectares 2025
Allotments	28	25	25	25
Amenity Greenspace	88	69	89	70
Cemeteries/Churchyards	23	25	30	27
Natural & Semi Natural Greenspace	17	591	20	224
Parks and Gardens	28	191	26	133

2.4 Quantity Evaluation – The table below shows that due to population increases since the last study, the current provision levels (hectares per 1000 population) have decreased slightly e.g. hectares have stayed similar, but population has increased.

Typology	2017	2025
Allotments	0.18	0.16
Amenity greenspace	0.49	0.45
Natural and semi-natural greenspace	4.20	1.45
Parks and gardens	1.36	0.86

2.5 Quality Evaluation - The table below summarises the results of the quality assessment (where applicable) for open spaces across Swale.

- There is generally positive quality of open space across all typologies. This is reflected in over half (60%) of assessed sites scoring above their set threshold for quality.

Typology	Lowest score	Average score	Highest score	Sites below typology threshold	Sites above typology threshold
Amenity greenspace	34%	53%	79%	17	25
Natural & semi-natural greenspace	40%	53%	74%	6	14
Park and gardens	37%	56%	89%	8	18

2.6 Summary Findings by Typology

Parks & Gardens:

- There are 26 sites identified as parks and gardens. An equivalent to 133 hectares.
- Swale has a current provision level of 0.86 ha per 1,000 population. This is above the Fields in Trust suggested standard of 0.80 ha per 1,000 population. The Sheppey Analysis Area (1.72) is above this, with Faversham (0.47) and Sittingbourne (0.50) both below.
- Minor gaps in catchment mapping are highlighted. It is noted that other forms of provision exist within these areas and may help/have an important role in ensuring access to open space.
- Quality and value are generally positive with high scoring sites such as Oare Gunpowder Works, Faversham Recreation Ground and Bartons Point Coastal Park highlighted. No significant quality/value concerns are identified.

Natural and Semi-Natural Greenspace:

- There are 20 sites identified as natural greenspace. An equivalent to 224 hectares.
- South Swale Nature Reserve, at 420 hectares, is omitted from the figures due to its significant size. Beaches are also not included in terms of quantity.
- Swale has a current provision level of 1.45 ha per 1,000 population. This is below the Fields in Trust suggested standard of 1.80 ha per 1,000 population. If South Swale Nature Reserve is included, a current provision level of 4.16 ha per 1,000 population is noted.
- There are three designated Local Nature Reserves. Consequently, LNR provision in Swale is sufficient against the cited Natural England standard.
- Gaps in catchment mapping are highlighted. It is noted that other forms of provision exist within these areas and may help/have an important role in ensuring access to open space.

- Quality and value are generally positive with high scoring sites such as Milton Creek Country Park, Minster Cliffs and Thistle hill Community Woodland highlighted. No significant quality/value concerns are identified.

Amenity Greenspace:

- There are 89 sites identified as amenity greenspace. An equivalent to 70 hectares.
- Swale has a current provision level of 0.45 ha per 1,000 population. This is below the Fields in Trust suggested standard of 0.80 ha per 1,000 population.
- Minor gaps in catchment mapping are highlighted. It is noted that other forms of provision exist within these areas and may help/have an important role in ensuring access to open space remembering that all sites under 0.2 hectares have not been included.
- Quality of assessed sites is mixed; however, value is generally positive. Lower scoring sites tends to reflect a lack of ancillary facilities at a site.

Allotments

- There are 25 sites classified as allotments, equating to almost 25 hectares.
- Swale based on its current population (154,619) is below the NSALG standard. Using this suggested standard, the minimum amount of allotment provision is 38 hectares. Existing provision of 25 hectares therefore does not meet this guideline.
- For allotments no quality/value assessments have taken place. Allotments are often difficult to assess due to being accessible for plot members only. However, allotments should generally be considered as highly valued as they are often identified by the local community as important forms of open space provision.

Cemeteries

- There are 30 sites classified as cemeteries/churchyards, equating to over 27 hectares of provision in Swale. No site size threshold has been applied and as such all known provision is included within the audit.
- No accessibility standard is set for this typology and there is no realistic requirement to set such standards. Provision should be based on burial demand.
- For cemeteries no quality/value assessments have taken place. The role of cemeteries is unique in comparison to other types of open space; one which is difficult to assess in terms of quality and value.

- 2.7 The provision standards used to determine deficiencies and surpluses for open space are set in terms of quality, accessibility, and quantity. The table below sets out the figures for existing quantity standards, current provision levels identified and national benchmarks.

Typology	Current provision (2025)	National benchmarks	Previous standards provision (2017)
Parks & gardens	0.86	0.80	1.36
Natural & semi-natural greenspace ¹	1.45	1.80	4.20
Amenity greenspace	0.45	0.60	0.49
Allotment	0.16	0.25	0.18

⁴. 4.16 hectares per 1,000 population if South Swale National Reserve were included

The difference in previous standards for parks is due to Milton Creek Country Park previously being classified as a park, but now as natural greenspace and in the Natural & Semi-natural greenspace typology, South Swale National Nature Reserve being removed in this study.

In summary, the following quantity standards are recommended based on current provision levels and trying to achieve the national benchmark.

Typology	Recommended Quantity Standard
Parks & gardens	0.86
Natural & semi-natural greenspace	1.80
Amenity greenspace	0.60
Allotment	0.25

- 2.8 Report Recommendations - The following provides a summary of what the Consultants feel should be seeking to achieve to help address the issues identified on the key findings and through the application of the standards. These need to be further developed over the next few months with input from Swale Officers and Members, followed by public consultation.

1. Sites helping, or with the potential to help, serve areas identified as having gaps in catchment mapping should be prioritised as opportunities for enhancement.
2. Ensure low quality/value sites helping to serve potential gaps in accessibility catchments are prioritised for enhancement.

3. Review areas with sufficient provision in open space and consider how they may be able to meet other areas of need.
 4. Keep data, reports and supporting evidence base up to date to reflect changes.
 5. Recommended standards to inform future growth requirements.
- 2.9 As soon as the Highsted Park Planning Enquiry is complete and a decision made on future location of development allocations, the second stage of the process can be developed, essentially expanding upon Recommendation 5 to produce the actual strategy.
- 2.10 The strategy document will summarise some of the existing elements such as fully setting the standards, identified shortfalls etc at the front end. It will also explore the Open Space requirements based on housing numbers and the allocation locations, providing what the provision requirement is for each and exploring if there any potential options around offsite contributions/enhancements (if for example there is an existing site/shortfall in the area).
- 2.11 This update report does not include anything on play areas as that function remains the responsibility of Housing, Health and Community Committee. Given this and the differences between play area typology and open spaces, a separate play area strategy is being developed.

3 Proposals

- 3.1 To note the update report.

4 Alternative Options Considered and Rejected

- 4.1 Failure to adopt an Open Spaces Strategy is not a feasible option given the evidence base that this robust assessment will give to the developing Local Plan.
- 4.2 Proceed with the next stage without considering the implications of Highsted Park Planning Enquiry. This is not recommended as it will mean several assumptions on location and demand for open spaces, which may in turn affect the strategies compliance with the NPPF.

5 Consultation Undertaken or Proposed

- 5.1 Consultation will be undertaken with stakeholders and community following approval of the initial draft of the full strategy.

6 Implications

Issue	Implications
Corporate Plan	<p>Community: To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience.</p> <p>Environment: To provide a cleaner, healthier, more sustainable and enjoyable environment and to prepare our Borough for the challenges ahead.</p>
Financial, Resource and Property	<p>This Strategy will ensure that the Council is providing cost-effective services and are making best use of the appropriate resources and property.</p> <p>By adopting a robust Open Spaces Strategy, the authority will stand a better chance of being successful with external grants and developer contributions to assist in delivery of the action plan. At this stage, no additional costs to the Council have been identified. However, there may be requests for contributory funding for individual projects as they are developed, and which will go through the usual budget request process.</p>
Legal, Statutory and Procurement	<p>The Strategy will underpin key sections of the Local Plan relating to Open Space. This is a required element of the Local Plan process, providing a robust evidence base for decisions. It will therefore assist in the Planning Inspectorate process.</p> <p>By providing a robust strategy that is compliant with National Planning Policy Framework, the Council will be better placed to defend any challenges which may be presented by developers.</p>
Crime and Disorder	<p>The provision and good management of a broad range of playing pitches and changing rooms can make a positive contribution to managing issues of crime and disorder by providing diversionary activities and encouraging community cohesion.</p>
Environment and Climate/Ecological Emergency	<p>The strategy will guide and influence the future provision and management of valuable open space facilities and promote sensitive quality management to support biodiversity. In addition, it has a role supporting sustainable urban drainage and carbon reduction through the provision of grassland and planting.</p>
Health and Wellbeing	<p>By providing and supporting a broad range of quality open space and facilities across Swale, there will be greater opportunities for people to participate in healthy activities.</p>
Safeguarding of Children, Young People and	<p>None identified</p>

Vulnerable Adults	
Risk Management and Health and Safety	Without a strategy that is compliant, the Borough will be at risk of not having the Local Plan agreed, missing funding opportunities, losing challenges to planning applications by developers, and not providing high quality facilities for its residents. By maintaining and inspecting its own facilities to agreed standards, the Council will ensure their facilities are safe and fit for purpose.
Equality and Diversity	Issues of equal opportunity will be addressed through applications for any changes to existing or new developments, ensuring that all open space and such facilities are compliant and fit for purpose.
Privacy and Data Protection	None identified

7 Appendices

7.1 None.

8 Background Documents

8.1 None.

Environmental Services & Climate Change Committee	
Meeting Date	10 July 2025
Report Title	Grounds Maintenance Contract Savings
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure
Lead Officer	Rob Lucas, Greenspace Technical Officer
Classification	Open
Recommendations	1. That the Committee approves the proposed savings and extension of the current Grounds Maintenance Contract between 14 January 2027 and 14 January 2029.

1 Purpose of Report and Executive Summary

- 1.1 As part of the Council's medium term financial planning, the Grounds Maintenance Contract (GMC) was identified for sustained reduction to annual costs over the remaining contract period.
- 1.2 To achieve the proposals outlined below, the incumbent Contractor (Contractor) was involved in regular meetings where the costs savings and subsequent service implications were discussed and agreed.
- 1.3 Whilst undertaking the negotiations it became clear that to achieve the targets within the proposal, the Council needs to activate the contract extension allowing the GMC to run until 14th January 2029.

2 Background

- 2.1 The GMC was previously tendered in 2021, covering the period January 2022 to January 2027. It provides for the maintenance of public open space including grass, facilities, hard landscape maintenance, litter/fly tip clearance, leaf clearance, shrub/herbaceous/rose bed and hedge maintenance, football/rugby pitch/tennis court and cemetery maintenance and management and play area maintenance. The 2025/26 value of the GMC is £1,768,443.13.
- 2.2 A reduction in cost is only possible by varying the GMC and, ultimately, by reducing the specification of works that are required. Discussions with the Contractor have produced a set of options for Members to consider which would deliver some of the targeted savings. These include;
- 2.3 Reduce the 'amenity grass cutting' specification from a 'performance' based criteria (removing the height tolerances outlined in clause 1.3.3 of the current contract specification) of approximately fifteen to sixteen times per year, to a 'frequency' based criteria with the contract crews visiting each site eight times per

year. There are some amenity grass areas currently within the bill of quantities that are either high profile and/or service dependent (play areas as an example) which will need to continue on a 'performance' basis – these will be added to the 'general amenity' route and round list. As with all the proposed changes, a schedule will be agreed between the principal client officer and the GMC manager.

- 2.4 Reduce the 'leaf collection' specification from a 'performance' based criteria (removing the time frames outlined in clause 5.2 of the current contract specification) of approximately five to six times per year, to a 'frequency' based criteria with the contract crews visiting all currently listed areas three times per year.
- 2.5 Amend the current 'shrub/herbaceous/rose bed" maintenance specification from categorised zones with varying visit schedules to one list with a frequency visit rate of six times per year.
- 2.6 Remove all 'annual bedding' (including planted graves) from the GMC. This would mean that these areas reverted to either amenity grass and/or shrub bed at a cost to the Council. Most planted grave agreements are historical, with most plots no longer visited or supported by family members. They hold minimal financial value, so any claim against the change in management is unlikely to adversely affect existing budgets.
- 2.7 Together, these changes will deliver an annual £75,000 saving against the existing budget (the value reducing to £1,693,443.13 based on the 25/26 value). Whilst a reduced level of service will undoubtedly change the aesthetic of the Borough, the reductions are considered to be feasible when weighed against the financial challenges facing the Council.
- 2.7 In order to realise the savings, there needs to be restructuring of the workforce and greater payback periods on the equipment, therefore, it is proposed that the Council extend the GMC by the 2 years identified within it, meaning that the expiry date will be moved to from 14th January 2027 to 14th January 2029. Technically this request can only be made in the final year of the contract. However, agreement would allow the savings to continue and safeguard the Council against current market financial pressures.

3 Proposals

- 3.1 That the Committee approves the proposed savings and extension of the current GMC between 14 January 2027 and 14 January 2029.

4 Alternative Options Considered and Rejected

- 4.1 To not extend the GMC or agree to the reduction in specification. This would mean that the savings would not be possible, and alternative savings would be needed to meet the medium-term financial plan.
- 4.2 An alternative option of extending the GMC for a further period of 5 years was investigated along with additional cuts to service but this is not considered to be possible due the timeframes for local government reorganisation, legal/procurement implications (that length of extension was not within the original tender) and would result in larger service reductions that would be detrimental to the Borough.

5 Consultation Undertaken or Proposed

- 5.1 The proposal, and others considered at the time but subsequently deemed not possible, were fully discussed and implications explained to our term contractor.
- 5.2 The proposal has been reviewed at EMT and informal administration meetings.

6 Implications

Issue	Implications
Corporate Plan	The current contractor has a proven track record of meeting good quality standards and provides good value for money contributing towards all the corporate priorities as it ensures that the grounds maintenance activities are completed to the agreed specification with consideration to the environmental impacts.
Financial, Resource and Property	Schedule 12A of the Local Government Act 1972 outlines categories of information that can be considered exempt from public access during local authority meetings. These exemptions are in place to protect sensitive information, including details about individuals, financial affairs, legal proceedings, and ongoing investigations. The breakdown of the figures mentioned in this open report can be found in the exempt Appendix I for this report.
Legal, Statutory and Procurement	As the GMC has already been awarded it meets the Council/Mid Kent Legal Services and Finance current standard Terms and Conditions. Both Mid Kent Legal Services and the Council's procurement leads were consulted and have confirmed the proposals sit within the current standard Terms and Conditions.

	<p>There are no TUPE implications within the proposal, although there would be some redundancy costs which will be borne by the contractor within the financial confines of the proposal.</p> <p>Public Services (Social Value) Act 2012 – the social values will remain the same as per the contractor's initial tender submission.</p> <p>The National Procurement Policy Statement considerations will remain the same as per the contractor's initial tender submission.</p>
Crime and Disorder	There are no crime and disorder implications within this proposal.
Environment and Climate/Ecological Emergency	The use of approved and certificated chemical controls will be increased but will be capped to no more than one hundred litres (approximately eighty litres used in 2024 for all contract related works) per annum. Most certificated chemical control products have recently received renewed licenses for production and use with many recent studies showing their use safer than other control methods such as steam and foam applications (destroys all living organisms, including beneficial bacteria, insects and weed seeds) and cultural controls (recorded loss of time for injury and long-standing physical damage to operatives involved within the horticultural industry).
Health and Wellbeing	The proposal would not incur any additional health and wellbeing implications. All current Contractor health and wellbeing is monitored via their policies and procedures which are audited annually by both Council Officers and external awarding bodies.
Safeguarding of Children, Young People and Vulnerable Adults	The proposal would not alter the safeguarding protocols undertaken by the Contractor which are audited annually by both Council Officers and external awarding bodies.
Risk Management and Health and Safety	The proposal would not alter the risk management and H&S protocols undertaken by the Contractor which are audited annually by both Council Officers and external awarding bodies.
Equality and Diversity	The proposal would not alter the equality and diversity protocols undertaken by the Contractor which are audited annually by both Council Officers and external awarding bodies.
Privacy and Data Protection	The proposal would not alter the privacy and data protection protocols undertaken by the Contractor which are audited annually by both Council Officers and external awarding bodies.

7 Appendices

7.1 Exempt Appendix 1 Implications - Financial, Resources and Property.

8 Background Documents

8.1 Not applicable

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Environmental Services and Climate Change Committee	
Meeting Date	10 th July 2025
Report Title	Public Conveniences Review – Business Case and Consultation Launch
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Martyn Cassell, Head of Environment and Leisure (for service provision) Joanne Johnson, Head of Place (for property assets)
Lead Officer	Andre Bowen, Service Improvement & Project Manager
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. To consult with residents on matching the service with the resources in the medium-term financial plan by: <ol style="list-style-type: none"> a) The closure of 3 public conveniences b) Exploring and then as appropriate undertaking formal negotiations to transfer 7 public conveniences to Town and Parish Councils or other appropriate local organisations; <ul style="list-style-type: none"> ○ Oare Gunpowder Works Visitors Centre ○ Central Car Park ○ Rose Street ○ Beachfields ○ Leysdown Beach Services ○ The Spinney ○ Queenborough Park c) Introducing a Community Toilet Scheme 2. Retender for 26/27 onwards for the remaining 6 public conveniences with the ability to add additional sites subject the scenarios in 2.7. 3. That officers consider opportunities to improve the condition of the remaining public conveniences, while improving energy and water efficiency where applicable.

1 Purpose of Report and Executive Summary

- 1.1 On 17th January 2024 the Environment and Leisure Committee considered a report on the *Procurement of Minor Maintenance and Cleansing of Public Conveniences Service*. The purpose of the report was to award the service contract, and a contractor was appointed on a 1 + 1 basis from 1st April 2024.
- 1.2 For 25/26, officers commissioned the +1 option available within the tender. The costs were in excess of budget c.£196k, due to both contract inflation and to the application of a further £100k budget reduction, as proposed by Finance Sub in 2023. This was corrected in the 25/26 budget setting but with the intention of conducting a full review during 25/26 to achieve the savings required in future years.
- 1.3 This report and the accompanying appendices set out the details of the full review and the formulation of the recommendations.

2 Background

- 2.1 Swale Borough Council currently maintains 16 public conveniences for use by the general public free of charge. The majority of public conveniences are open between 07.00 and 19.00 Mon – Sun, with some facilities having seasonal changes. There are two public conveniences which are currently closed due to building structural issues and vandalism. The full list of public conveniences is as follows (Map of locations in Appendix II):
 - The Forum, Sittingbourne
 - Library Car Park, Sittingbourne
 - Rose Street, Sheerness
 - Central Car Park, Faversham
 - Leysdown Beach Services, Leysdown
 - Minster Leas, Minster
 - Faversham Recreation Ground, Faversham
 - Milton Regis High Street, Milton Regis (temporarily closed)
 - Queenborough Park, Queenborough
 - Bartons Point, Minster
 - The White House, Minster (temporarily closed)
 - Oare Gunpowder Works Visitors Centre, Faversham
 - The Spinney, Leysdown
 - King George V Playing Field, Sittingbourne
 - Milton Creek Country Park, Sittingbourne
 - Beachfields, Sheerness
- 2.2 There are two additional toilet block buildings that the Council owns but have been permanently closed for some time (Eastchurch and Rushenden). The intention is not to reopen these and to dispose or demolish the buildings.
- 2.3 The Council recognises the key role that toilet facilities play in the community. They encourage visits to the town centre, help enhance health and wellbeing and

support our vulnerable residents as we are aware that many residents consider the availability of toilets when choosing to visit areas.

- 2.4 However, there has not been a major review of provision for a long time, and we need to ensure the service remains fit for purpose. The Council has therefore undertaken a full review of public toilet provision to determine the future of each facility. This has involved looking at usage data, proximity to other facilities, condition of the facilities and interest of town and parish councils in operating the facilities.
- 2.5 A comparative analysis of the financial and non-financial costs and benefits associated with each option shown in the proposal section below, has been considered in detailed Business Case at Appendix I and Toilet Profiles at Appendix II.
- 2.6 Further work has been undertaken to look how the service should be delivered for any sites that would remain the responsibility of the Council. This included looking at in-house and contracted out operating models (Appendix IV).
- 2.7 Some of the proposals are still subject to agreement such as the transfers to town and parish councils. Note all transfers will be in line with the recently agreed Disposals and Community Asset Transfer Policies. If transfer negotiations with those that have initially showed interest are not successful, further toilet closures will be required to meet the budget. These will use the same criteria for this report's closure recommendations.
- 2.8 Whilst the report makes recommendations, it is for the Committee to debate the pros and cons of each recommendation. Furthermore, it is vital that the views of residents are considered through a stage of public consultation once the committee has come to an initial position. We therefore plan to undertake a public consultation following this committee.
- 2.9 Considering the impact that closures may have on some residents, the review also considered alternative provision options. Other local Councils operate Community Toilet Schemes. Here, the Council promotes local businesses that allow use of their toilet facilities regardless of whether you are a customer. This has benefits both for the business and local residents. To ensure the scheme remains active, Officers will regularly monitor participating businesses so that the information available to the public is kept up-to-date. Appendix III looks at this in more detail.

3 Proposals

- 3.1. To consult with residents on matching the service with the resources in the medium-term financial plan by:
 - a) The closure of 3 public conveniences

- b) Exploring and then as appropriate undertaking formal negotiations to transfer 7 public conveniences to Town and Parish Councils or other appropriate local organisations;
 - Oare Gunpowder Works Visitors Centre,
 - Central Car Park,
 - Rose Street,
 - Beachfields,
 - Leysdown Beach Services,
 - The Spinney
 - Queenborough Park
- c) Introducing a Community Toilet Scheme

- 3.2. Retender for 26/27 onwards for the remaining 6 public conveniences with the ability to add additional sites subject the scenarios in 2.7.
- 3.3. That officers consider opportunities to improve the condition of the remaining public conveniences, while improving energy and water efficiency where applicable.

4 Alternative Options Considered and Rejected

- 4.1 The least favourable option of 'do nothing' and continuing with the current number of sites and method of operation was rejected due to financial constraints. Additionally, the overall condition of the public convenience stock means that there would be considerable capital costs for urgent and non-urgent repairs/improvements. The maintenance costs for existing public conveniences between 2023 and 2032 are projected to be £1.5 million.
- 4.2 An insourcing option has been considered in Appendix IV. This option offers the least amount of savings. However, the risks introduced from insourcing operations are considered to outweigh the possible savings.
- 4.3 A charging model was also explored in Appendix V. While charging has an opportunity to generate a revenue, it is only suitable where there is already a high tourist footfall and the facilities are in excellent condition.

5 Consultation Undertaken or Proposed

- 5.1 Officers from across the Council which includes representatives from the Property Team, Contract Management and Legal have reviewed the public convenience provision provided by the Council and proposed the recommendations.
- 5.2 Parish and Town Councils were contacted about the review of public conveniences and asked to share their views including whether they would be interested in taking over responsibility. Collectively, there are 7 public

conveniences that Parish and Town Councils could take on management responsibilities for, as seen in Appendix VI.

- 5.3 Where there were possible closures of public conveniences, local businesses were asked if they would consider opening their facilities to the public. A total of 6 businesses expressed an interest as shown in Appendix VII.
- 5.4 This reports proposes consulting members of the public regarding the closure of some public conveniences. An Equality Impact Assessment (EIA) has been completed to show how the council has had due regard to the public sector equality duty (Equality Act 2010) in decision-making, as seen in Appendix VIII. This will also be updated following public consultation.

6 Implications

Issue	Implications
Corporate Plan	<p>The agreed way forward will support several Corporate Plan objectives. These include 'Running the Council' by working within our resources, and delivering in a transparent and efficient way. The 'Environment' objective is supported by reducing the environmental impact on the air and treated water wastage. While the 'Economy' objective is supported through working with businesses to increase customer footfall and free facilities for local people.</p>
Financial, Resource and Property	<p>The financial impacts of each option will vary. The 'do nothing' option would create no savings and the costs would increase each year with inflation.</p> <p>For 25/26, officers commissioned the +1 option available within the tender. The costs were in excess of budget c.£196k, due to both contract inflation and to the application of a further £100k budget reduction in 2023. The recommended mitigation for this is to close some facilities on a permanent basis (including the removal of those closed at Eastchurch and Rushenden), which would deliver the savings proposed in the medium-term financial plan. Full financial details are included in Appendix I: Business Case.</p> <p>Town and Parish Councils are able to raise funds through a "precept," which is a charge levied on residents' Council Tax bills in order to fund and improve a range of local services and amenities, like parks, community centres, and public toilets. Transferring the assets to Town or Parish Councils may likely require a public convenience dowry payment to take on the assets for a 1-year period after transfer, to cover maintenance liabilities / consumables / legal fees.</p>

	<p>Research from other Boroughs, shows that Community toilet scheme partners would require a small fee to retain interest and protect provision for residents.</p> <p>A ring-fenced allocation for toilet improvements has been made in the UK Shared Prosperity Fund grant for 25/26 totalling £40,000.</p>
Legal, Statutory and Procurement	<p>There is no statutory requirement for the Council to provide public conveniences, however we recognise the role they play in the community.</p> <p>Transferring the assets to Town or Parish Councils and 'Community toilet' agreements would require Legal input. The timescale for completing the asset transfers ahead of 31st March 2026 will prove challenging. If this is the case, we will need to use the current tender to allow service to continue at these sites until transfer is complete.</p>
Crime and Disorder	<p>Public conveniences are partly attended where there is a higher risk of crime / vandalism if unattended. Future investment needs to 'design out' problems. Evidence of this can be seen in recent new build toilet provision.</p>
Environment and Climate/Ecological Emergency	<p>The closure of several public conveniences reduces the impact of water wastage and emissions from Council and Contractor operations. Any investment plan should look at reducing emissions from carbon reduction mechanisms such as LED lighting, timed lighting, reduced water usage etc.</p>
Health and Wellbeing	<p>The provision of public conveniences can bring health and wellbeing benefits to members of the public. Residents with health issues may rely on public toilets when making decisions to visit local areas.</p>
Safeguarding of Children, Young People and Vulnerable Adults	<p>We recognise that toilet provision is important to some vulnerable residents. Public conveniences may be particularly beneficial for older people, those with disabilities, pregnant women and children. New facilities consider the implications of communal toilets and use singular cubicles viewed directly from the outside.</p>
Risk Management and Health and Safety	<p>There are financial and legal risks associated with asset transfers and the community toilet scheme, as outlined in the report. However, expert advice has been sought from the Head of Finance and the Head of Legal to address these concerns.</p> <p>There is a risk of reputational damage through closure of facilities. Residents will be consulted on the proposed changes, efforts will be made to explain the decision clearly and in future signage/website information to help direct residents and visitors to our facilities.</p>

	<p>There is risk of reputational damage if 'community toilet' scheme fails to meet commitments. Through regular inspections, legal agreements and intensive promotion, these risks are minimised.</p> <p>There are risks of vandalism from a reduced service or removed service. Closed public toilets will be secured / declared as a surplus / disposed of appropriately in line with the agreed Disposals / Community Asset Transfer Policies.</p>
Equality and Diversity	Closure or reduced provision may impact particular groups more than others as identified in the Equalities Impact Assessment, which will be revised after a public consultation.
Privacy and Data Protection	None.

7 Appendices

Appendix I: Business Case
 Appendix II: Public Convenience Profiles
 Appendix III: Community Toilet Scheme Report
 Appendix IV: Insourcing Report
 Appendix V: Charging Model Report
 Appendix VI: Parish Council Responses
 Appendix VII: Local Businesses Interested in Community Toilet Scheme
 Appendix VIII: Equality Impact Assessment
 Appendix IX - Public Toilet Facilities Consultation Printable

8 Background Papers

None.

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PUBLIC CONVENIENCE PROFILES

January 2025

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INTRODUCTION

This report outlines various public conveniences maintained by Swale Borough Council. Each public convenience is objectively compared with each other using a variety of pertinent factors. This facilitates the formation of a fair and objective opinion.

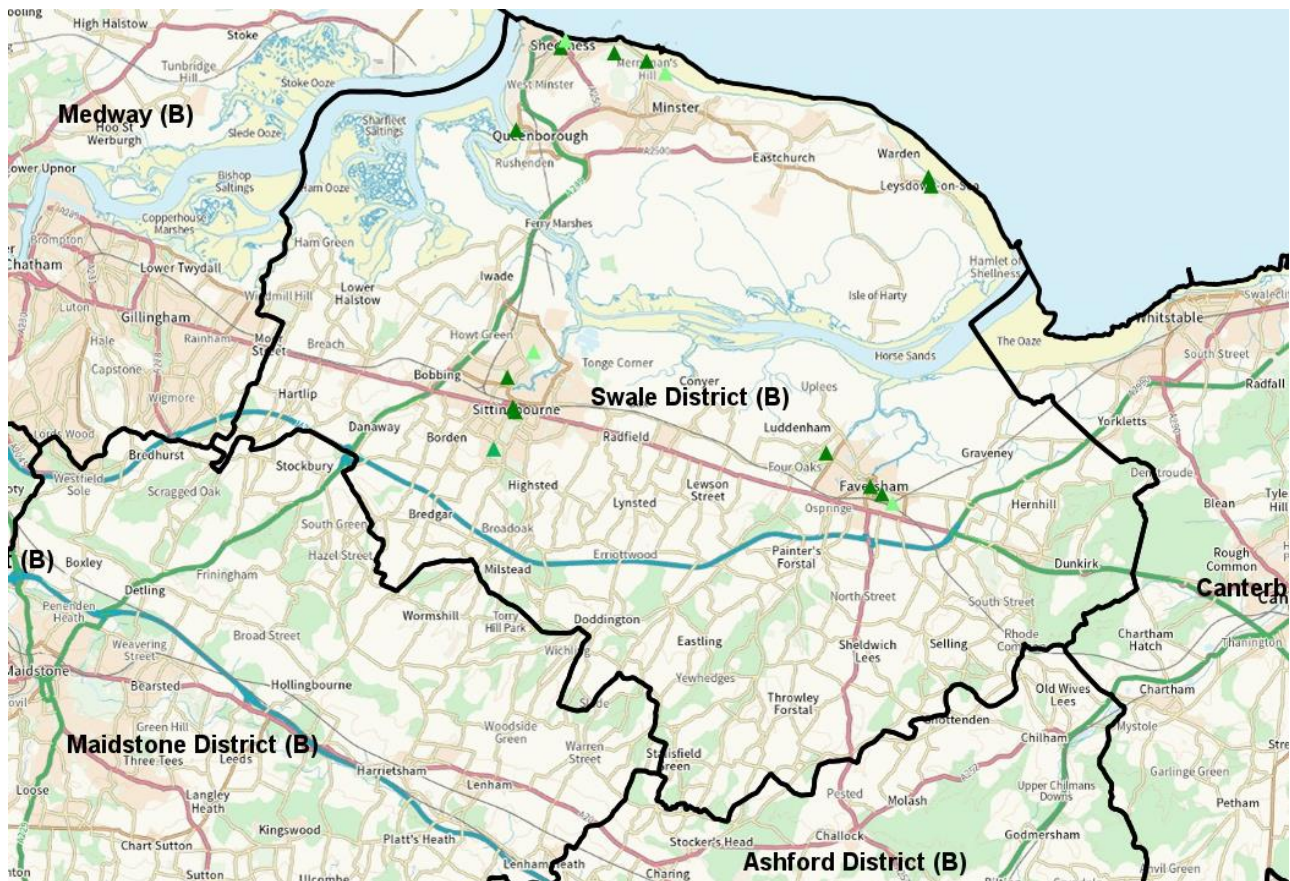


Figure 1. Swale Borough Council Public Conveniences

THE CURRENT SITUATION

Swale Borough Council currently maintains 16 public conveniences for use by the general public free of charge. The majority of public conveniences are open between 07.00 and 19.00 Mon - Sun, with some facilities having seasonal changes.

Compared with other neighbouring unitary and borough councils, Swale is the second smallest in size and has the most council maintained toilets. Despite this Swale Borough Council has the second lowest amount of toilets available for members of the public compared with neighbouring unitary and borough councils.

SUMMARY OF PROFILE STRUCTURE

The profile structures used throughout this report presents each public convenience objectively outlining each of their merits and shortcomings to help determine which public conveniences maximise value for money.

Each public convenience profile contains;



Address



Picture of site



Ward



Parish / Town



Average daily visitors (based on 2018 and 2024 data collected)



Number of ASB reports (based on reports in 23/24)



Condition (based on condition survey in 2023 and recent officer inspection)



Annual costs (adjusted for inflation)



Cost per user (adjusted for inflation)



Accessible /



Baby changing



Opening hours

It is important to note that there are also several more subjective aspects of public conveniences relevant to respective geographic locations such as;

- Enhanced Community Well-being
- Improved Public Health-
- Boost to Local Economy
- Enhanced Visitor Experience
- Support for Outdoor Activities
- Civic Pride

PUBLIC CONVENIENCE PROFILES

Library Car Park, Sittingbourne



Central Avenue, ME10 4BX

Address



Homewood

Ward



Average
daily
visitors

103



Annual
costs

£31,562.20



Accessible
Baby changing



Parish /
Town

Non-Civil Parish



Condition

YELLOW



Number
of ASB
reports

3



Cost per
user

£0.84



Opening
hours

07.00 - 19.00 Monday -
Saturday and 09.00 - 18.00
on Sunday and Bank
Holidays

The Forum, Sittingbourne



High Street, ME10 3DL



Chalkwell



97



£30,635.43



Accessible
Baby changing



Non-Civil Parish



YELLOW



5



£0.86



07.00 - 19.00 Monday -
Saturday and closed
Sundays

Milton Regis High Street, Milton Regis



Address

High Street, ME10 2AN



Ward

Milton Regis



Average
daily
visitors

13



Annual
costs

£13,438.77



Accessible



Parish /
Town

Non-Civil Parish



Condition

RED



Number
of ASB
reports

2



Cost per
user

£2.83



Opening
hours

07.00 - 18.00 Monday -
Sunday

Milton Creek Country Park, Sittingbourne



Saffron Way, ME10 2EX

Address



Milton Regis

Ward



Average
daily
visitors

74*



Annual
costs

£17,954.37



Accessible



Parish /
Town

Non-Civil Parish



Condition

GREEN



Number
of ASB
reports

0



Cost per
user

£0.66



Opening
hours

07.00 - 16.00 Monday -
Sunday between October
and 31st March 07.00 -
19.00 1 April - 30
September

*Assumed average daily visitors

King George V Playing Field, Sittingbourne



Address

Park Avenue, ME10 1QX



Ward

Woodstock



Average
daily
visitors

109



Annual
costs

£17,792.08



Parish /
Town

Non-Civil Parish



Condition

YELLOW



Number
of ASB
reports

0



Cost per
user

£0.45



Opening
hours

07.00 - 19.00 Monday -
Sunday

Oare Gunpowder Works Visitors Centre, Faversham



Address

Bysingwood Road, ME13
7UD

Parish /
Town

Faversham



Ward

Priory



Condition

YELLOW

Average
daily
visitors

14

Number
of ASB
reports

0

Annual
costs

£7,504.36

Cost per
user

£1.47



Accessible

Opening
hours

Saturdays, Sundays and
Bank Holidays 10.00 -
16.00

Central Car Park, Faversham



Address

Cross Lane, ME13 8PN



Parish /
Town

Faversham



Ward

Abbey



Condition

YELLOW



Average
daily
visitors

265



Number
of ASB
reports

6



Annual
costs

£58,357.74



Cost per
user

£0.60



Accessible
Baby changing














Opening
hours

07.00 - 19.00 Monday -
Saturday and 09.00 - 18.00
on Sunday and Bank Hols

Faversham Recreation Ground, Faversham



	Park Road, ME13 8ES		Faversham
Address		Parish / Town	
	Abbey		GREEN
Ward		Condition	
	26		2
Average daily visitors		Number of ASB reports	
	£26,230.22		£2.76
Annual costs		Cost per user	
	 Accessible Baby changing		07.00 - 19.00 Monday - Sunday
		Opening hours	

Queenborough Park, Queenborough



Address

High Street, ME11 5AG



Parish /
Town

Queenborough



Ward

Queenborough and Halfway



Condition

YELLOW



Average
daily
visitors

28



Number
of ASB
reports

1



Annual
costs

£30,421.38



Cost per
user

£2.97



Accessible



Opening
hours

07.00 - 19.00 Monday -
Sunday

Rose Street, Sheerness



Address

Wood Street, ME12 1UA



Parish /
Town

Sheerness



Ward

Sheerness



Condition

YELLOW



Average
daily
visitors

117



Number
of ASB
reports

5



Annual
costs

£49,813.30



Cost per
user

£1.17



Accessible



Opening
hours

07.00 - 19.00 Monday -
Saturday and 09.00 - 18.00
on Sunday and Bank
Holidays

Beachfields, Sheerness



Address

Royal Road, ME12 1AY



Parish /
Town

Sheerness



Ward

Sheerness



Average
daily
visitors

74*



Annual
costs

£23,971.29



Accessible



Condition

GREEN



Number
of ASB
reports

4



Cost per
user

£0.89



Opening
hours

07.00 - 19.00 Monday -
Sunday

*Assumed average daily visitors

Bartons Point, Minster



Marine Parade, ME12 2BX

Address



Minster-on-sea

Parish / Town



Sheerness

Ward



GREEN

Condition



25

Average daily visitors



3

Number of ASB reports



£50,507.61

Annual costs



£5.53

Cost per user



Accessible



Opening hours

07.00 - 16.00 Monday - Sunday between October and 31st March. 07.00 - 19:00 1 April - 30 September.

Minster Leas, Minster



Minster Beach Path, ME12
2NJ



Ward

Minster Cliffs



Average
daily
visitors

49



Annual
costs

£21,986.65



Accessible



Parish /
Town

Minster-on-sea



Condition

GREEN



Number
of ASB
reports

5



Cost per
user

£1.23



Opening
hours

07.00 - 16:30 Monday -
Sunday between October
and 31st March 07.00 -
19.00 1 April - 30
September

The White House, Minster



Address

The Broadway, ME12 2DE



Parish /
Town

Minster-on-Sea



Ward

Minster Cliffs



Condition

RED



Average
daily
visitors

16



Number
of ASB
reports

2



Annual
costs

£26,957.45



Cost per
user

£4.61



Accessible



Opening
hours

07.00 - 19.00 Monday -
Sunday

Leysdown Beach Services, Leysdown



Address

Grove Avenue, ME12 4QE

Parish /
Town

Leysdown



Ward

Sheppey East



Condition

YELLOWAverage
daily
visitors

161

Number
of ASB
reports

1

Annual
costs

£53,976.46

Cost per
user

£0.92

Accessible
Baby changingOpening
hours

General Hours: Monday to
Saturday: 07:00 - 19:00,
Sunday and Bank
Holidays: 09:00 - 18:00.
Leysdown Beach Services
and Leysdown Beach
External Toilet times vary.

The Spinney, Leysdown



Address

Leysdown Road, ME12 4QX

Parish /
Town

Leysdown



Ward

Sheppey East



Condition

YELLOWAverage
daily
visitors

13

Number
of ASB
reports

0

Annual
costs

£17,454.71

Cost per
user

£3.68



Accessible

Opening
hours07.00 - 19.00 Monday -
Sunday

Summary Table

Site	Parish	Condition	Average visits per day	Cost per user	Annual cost	Number ASB reports
Library Car Park, Sittingbourne	Non-Civil Parish	Yellow	103	£0.82	£31,562.20	3
The Forum, Sittingbourne	Non-Civil Parish	Yellow	97	£0.85	£30,635.43	5
Milton Regis High Street, Milton Regis	Non-Civil Parish	Red	13	£2.77	£13,438.77	2
Milton Creek Country Park, Sittingbourne	Non-Civil Parish	Green	N.A.	£0.65	£17,954.37	0
King George V Playing Field, Sittingbourne	Non-Civil Parish	Yellow	109	£0.44	£17,792.08	0
Oare Gunpowder Works Visitors Centre, Faversham	Faversham Town Council	Yellow	14	£1.44	£7,504.36	0
Central Car Park, Faversham	Faversham Town Council	Yellow	265	£0.59	£58,357.74	6
Faversham Recreation Ground, Faversham	Faversham Town Council	Green	26	£2.71	£26,230.22	2
Queenborough Park, Queenborough	Queenborough Town Council	Yellow	28	£2.92	£30,421.38	1
Rose Street, Sheerness	Sheerness Town Council	Yellow	117	£1.14	£49,813.30	5
Beachfields, Sheerness	Sheerness Town Council	Green	N.A.	£0.87	£23,971.29	4
Bartons Point, Minster	Minster-on-sea Parish Council	Green	25	£5.42	£50,507.61	3
Minster Leas, Minster	Minster-on-sea Parish Council	Green	49	£1.20	£21,986.65	5
The White House, Minster	Minster-on-sea Parish Council	Red	16	£4.52	£26,957.45	2
Leysdown Beach Services, Leysdown	Leysdown Parish Council	Yellow	161	£0.90	£53,976.46	1
The Spinney, Leysdown	Leysdown Parish Council	Yellow	13	£3.60	£17,454.71	0



Community Toilet Scheme Report February 2025

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Background

The Environment and Leisure Committee approved the award of a service contract for minor maintenance and cleansing of public conveniences. A contractor was then appointed on a 1 + 1 basis from 1st April 2024.

The +1 option available within the tender was enacted for 25/26, the costs in excess of budget are c. £196k, due to both contract inflation and to the application of a further £100k budget reduction, as proposed by Finance Sub in 2023. This was corrected in the 25/26 budget setting but with the intention of conducting a full review during 25/26 to achieve the savings required in future.

Subsequently, a range of options are being explored to bring the budget into alignment with the costs. This includes partnership provisions with private businesses.

Many local authorities offer Community Toilet Schemes to supplement existing public toilet provisions.

Local Business Partnerships in Kent

Maidstone Borough Council

Maidstone Community Toilet Scheme

Community Toilet Scheme

Maidstone Borough Council is working with local businesses like shops, restaurants and pubs, to help improve the provision of public toilet facilities within the Town Centre. Through this scheme you will have more access to clean, safe and accessible toilets.

A number of organisations are participating in the scheme which means that you are able to use their toilet facilities during normal opening hours without having to make a purchase.



1
Maidstone Museum
St Faith's Street • Tues to Sat 10am - 5PM,
Sun 12pm - 4pm (1 Apr - 31 Oct only)



2
McDonalds
Broadway • Sun to Wed 6pm - 11pm
Thurs to Sat 6am - 12am



3
McDonalds
Week Street • Sun to Wed 6am - 11pm
Thurs to Sat 6am - 12am



4
Mall Chequers Centre
Mon to Sat 9am - 5.30pm
Sun 10.30am - 4.30pm



5
Maidstone Market
Lockmeadow • Mon 7am - 4pm,
Tues 5am - 4pm,
Wed & Thurs 7am - 5pm,
Fri 7am - 1pm, Sat 6am - 3pm



6
Muggleton Inn
High Street • Mon to Thurs 8am - Midnight
Fri and Sat 8am - 1am
Sun 8am - Midnight



7
Royal Albion
St Faith's Street • Mon to Sun
11am-11pm

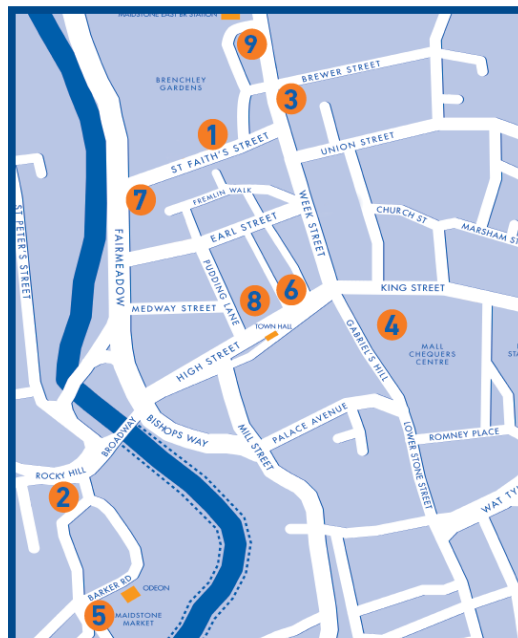


8
Royal Star Arcade
Market Buildings • Mon to Sat
9am - 5.30pm



9
Society Rooms I Wetherspoons
Week Street • Mon to Thurs 8am - Midnight
Sun 8am - 12pm, Fri & Sat 8am - 1am

Need a toilet?
Look for this
sticker!




www.maidstone.gov.uk


MAIDSTONE
Borough Council

Maidstone Borough Council's Community Toilet Scheme was first introduced in 2008, following a review of public conveniences. The scheme currently has 9 members. Most businesses in this scheme receive an annual payment of £300 from the Council to cover the cost of any additional supplies, however one establishment receives £600 as this is the only toilet which opens after 11pm.

Community Toilet Scheme

Ashford Borough Council is working with local businesses to help improve the provision of safe and hygienic toilet facilities in the town centre. Through this scheme you will have access to clean, safe toilets during the normal opening hours of each establishment listed. No purchase is required for the use of these toilets.






Key

Key	Business	Facilities
1	County Square	male, female, disabled, baby change
2	Debenhams	male, female, disabled, baby change
3	Muffin Break	male, female, disabled, baby change
4	Stag Coffee	male, female, disabled, baby change
5	Little Tea Pot	male, female, disabled, baby change
6	The Phoenix	male, female, disabled, baby change
7	Pizza Express	male, female, disabled, baby change
8	Civic Centre	male, female, disabled, baby change
9	Ashford Gateway Plus	male, female, disabled, baby change
10	New Rents	male, female, disabled, baby change
11	Macdonald's	male, female, disabled, baby change


Organisations within the scheme have a yellow sticker displayed in their window, which advises the facilities available.

We're in the
Community Toilet Scheme
Use our facilities for free



male female disabled baby change

under 10's must be accompanied by an adult



www.ashford.gov.uk/community-toilet-scheme

Maidstone Borough Council’s Community Toilet Scheme was first introduced in 2016, following a review of public conveniences. The scheme currently has 11 members. The average payment is approximately £857 per business per year.

Benefits

There are several benefits of operating a community toilet scheme, such as;

- Increased Availability
The more local businesses that take part in a community toilet scheme, mean there are more public toilet options available for residents and visitors. This can make areas more attractive to tourists, enhancing the overall visitor experience.
- Cost Savings
Local authorities that operate community toilet schemes are able to reduce the costs of public toilets provision. The maintenance and upkeep costs are shared between the local business and the local authority.
- Economic Boost
Residents and visitors who use the nearest public toilets available leads to increased foot traffic to well-placed participating businesses. This increase in foot traffic can lead to higher sales and economic benefits for the local economy.
- Well maintained
In addition to Council Officers inspections, local businesses regularly inspect and clean their toilets. This often leads to high hygiene standards and are less likely to be vandalized compared to standalone public toilets.
- Positive Publicity
Participating businesses can benefit from positive publicity and enhanced reputation for contributing to the community. Businesses that are a part of a community toilet scheme have a sense of pride and responsibility.

Drawbacks

Similarly, community toilet scheme have several drawbacks, such as;

- Inconsistent Quality
The quality and cleanliness of facilities can differ from one business to another. Additionally, each business may have its own standards for maintaining consistency in quality and cleanliness
- Potential Misuse
There is a risk of misuse or overuse of facilities, which could lead to increased maintenance needs and costs for businesses. Participating businesses may face increased operational costs and responsibilities, which could be a burden, especially for smaller establishments.
- Limited Access
Access to facilities may be restricted based on business operating hours. Some businesses may open and close later in the day compared with others and vice versa. Weekend hours of operation may also be limited.
- Limited Awareness
Residents and visitors may not be aware of the participating businesses or of the scheme itself. Likewise, where there are changes to businesses newly participating or no longer participating, many people may not be aware of this.
- High Demand
Where there is a strong demand for free facilities, this can lead to overcrowding, impacting the primary business operations. Businesses may also struggle to keep up with the increased maintenance demands, leading to potential hygiene issues.

Opportunities

Swale Borough Council has the opportunity to increase the number of public toilet options available for residents and visitors, while not taking on the full financial responsibility.

There already exists private establishments that offer publicly available toilets free of charge.

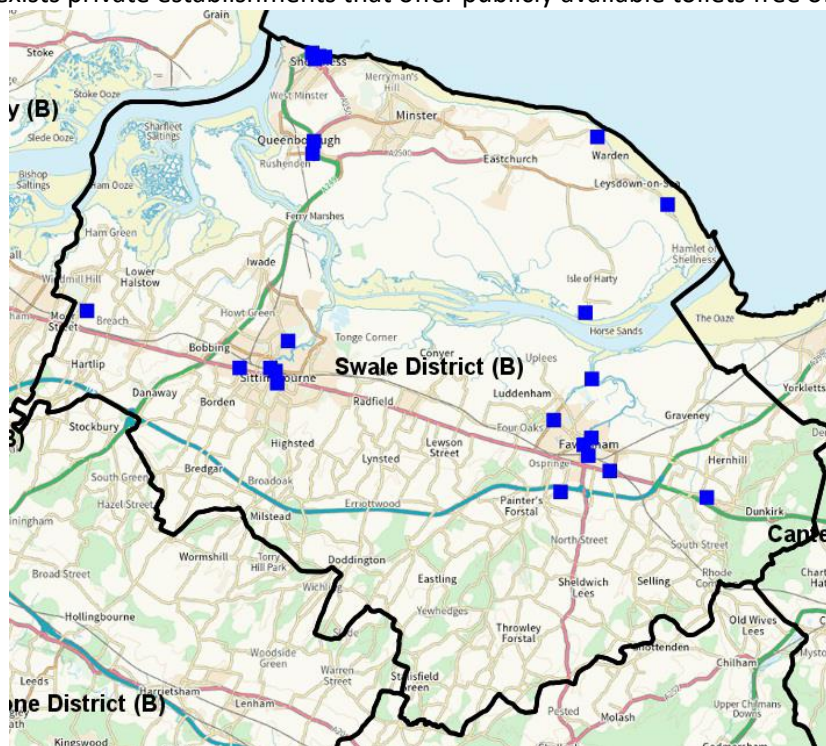


Figure 1: Map of Non-Swale Borough Council Maintained Toilets

These include The Barnyard, Esso Filling Station, Asda Superstore, Morrisons Supermarket x2, Sittingbourne Station, Queenborough Service Station, Tesco Extra x2, Warden Springs Caravan Park, Neptune's Beach Café, The Ferry House, The Shipwright's Arms, Sainsbury's Superstore, Faversham Railway Station, Shell Filling Station and Brogdale.

These toilets are however not inspected by Council Officers and no support is provided by the Council.

Other publicly available toilets within the borough include community halls and leisure centres.

Mitigation Measures

Swale Borough Council can address known issues with Community Toilet Schemes through;

- Appealing to local businesses
Businesses who have been a part of Community Toilet Schemes or expressed an interest in taking part have identified needing support with cleaning costs and supplies. Offering a token incentive presents a willingness to work in partnership to provide public toilets for residents and visitors. Particularly, where there are well established businesses with extended opening hours.
- Advertise Public Toilets

There are a number of ways publicly available toilets can be publicised, promoting participating businesses and access to residents and visitors.

- Signs informing passers-by placed in several locations informing readers of the community toilet scheme
- Signs at all participating business locations informing passers-by that their toilets are available, and of the types of toilet that they provide.
- Online information can help residents and visitors plan their journeys. Additionally, where no signs are visible an online resource can be used to locate the nearest facility.

- Vetting

The Community Toilet Scheme aims to attract businesses with well-maintained toilets that serve families in need of baby changing facilities and individuals with disabilities, and that are open for business a variety of hours. However, to ensure that core values of the scheme are adhered to, only businesses that can provide facilities where they are needed will be approved.

- Monitoring

Regular inspections by Council Officers ensure that participating businesses uphold the cleanliness quality standards expected of publicly available toilets consistently. Officers regularly monitoring participating businesses also means that the information available to the public is kept up-to-date.

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Charging Model Public Convenience Report February 2025

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Background

The Environment and Leisure Committee approved the award of a service contract for minor maintenance and cleansing of public conveniences. A contractor was then appointed on a 1 + 1 basis from 1st April 2024.

The +1 option available within the tender was enacted for 25/26, the costs in excess of budget are c. £196k, due to both contract inflation and to the application of a further £100k budget reduction, as proposed by Finance Sub in 2023. This was corrected in the 25/26 budget setting but with the intention of conducting a full review during 25/26 to achieve the savings required in future.

Subsequently, a range of options are being explored to bring the budget into alignment with the costs. This includes charging members of the public a small fee for use of public conveniences.

Section 87 of the Public Health Act 1936 (as amended) gives local authorities a discretion to provide public sanitary conveniences in proper and convenient situations and may also charge fair and reasonable fees.

The Association for Public Service Excellence (APSE) found that the councils that did charge for public conveniences did not make a profit, based on the survey conducted in March and April 2024.

Access Control Mechanisms

Generally speaking there are two types of access control used for public conveniences that charge a fee. That is, Door Control Systems and Paddlegates.

Door Control Systems



© Healthmatic

A door control system provides a secure, effective and simple means of access control at the point of entry into a public convenience or for individual stalls. These are often able to be remotely opened and closed, give timed access, and manage utility efficiencies, through only operating lights etc when the toilet is operational. Door control systems can also be used on their own or combined with other systems. eg – Coin with Contactless.

Paddlegates



© Healthmatic 2025

Although there are various types of paddle gates, they generally provide access to toilets, libraries and other public spaces, whether for the purpose of charging for entry, managing throughput by smartcard or simply to limit the number of people entering an area. Paddlegates are also compatible with Coins set to the desired tariff, RADAR Key, Contactless Card or RFID reader and Keypad entry.

Charging Income

Payment Type

Most access control mechanisms provide options for cash and/or contactless. However each, option has its own unique benefits and challenges.

For instance, while contactless payment is quicker it excludes those without access to contactless payment.

On the other hand, although coin systems are generally reliable and less prone to technical issues compared to electronic payment systems, they require manual transportation of coins and a target for vandalism.

Fee

According to survey of councils in March and April 2024 by the Association for Public Service Excellence (APSE), councils charge between £0.10 and £0.50.

Some councils offer residents the option of using discounted prepaid cards instead of paying directly with cash or bank cards.

Reasoned Scenario

	Year 1 (£)	Year 2 (£)	Year 3 (£)
Sales	14,508.75	14,508.75	14,508.75
Administration fee	948.87	948.87	948.87
Rental fee	120.00	122.40	124.85
Maintenance	1,591.81	1,623.65	1,656.12
Cash collection/delivery	0	0	0
Net income	11,848.07	11,813.83	11,778.91

NB:

- Equipment and installations costs requires are estimated at 23,367.80
- Costs relating to vandalism not included here.

Sales

Research conducted by Healthmatic details the impact charging can have on footfall:

- For residents, the impact of imposing a charge will depend on the quality of the toilets. In research carried out by local authorities, people say they would pay for toilets if they were clean, tidy and safe.
- A 20p charge will halve the usage for a quality toilet. At 50p this will rise to a 75% reduction.
- Tourists are less price sensitive to toilet charging than local people for two reasons:
 - Little knowledge of the alternative provision
 - An acceptance of charging while away from home
- The introduction of charging will therefore have less effect in those areas that are more tourist orientated. In addition, visitors are less price elastic meaning they are less sensitive to the actual level of the charge.
- The combination of low impact on volumes and low sensitivity to charging in more visitor orientated areas, means that charging will earn revenue without dramatically affecting the number of people seeking and using the toilet.

Based on the above an estimate of 29,018 visitors annually is used here across all 3 years. This figure is derived from the fact that the highest average daily footfall recorded in 2024 was 265 users. Over the course of a year equates to 96,791.25 annual visitors. However, using a £0.50 charge and accounting for a 70% reduction in footfall leave an estimated 29,018 visitors annually.

Administration fee

The cashless payment operator typically charges 2.54% + 2pm for every transaction. This equates to a 6.54% administration fee on every sale.

Rental fee

In addition to administration costs, there is also a nominal fee of £10 per month which can be assumed to increase every year in line with an average of 2% inflation.

Maintenance

To ensure the smooth operation of the charging mechanisms, will require regular maintenance by skilled professionals. The increase in costs each year is in line with inflation.

Cash collection/delivery

Secure cash collection/delivery firms normally charge around £17.50 per delivery of an value up to £5000.

However, eliminating the option of paying by cash reduces the costs of involved in cash collection and the risk of anti-social behaviour if cash was contained on site.

Equipment and Installation

A paddlegate system offers a visual barrier but instantly opens once payment is made allowing for fast throughput. Paddlegates are better equipped at detecting tailgating compared with door control systems. They also act as a robust alternative to their turnstiles predecessors, providing access for wheelchairs, buggies and ambulant disabled people. A paddlegate system can also provide a secure and effective way of controlling access with fewer individual access points to maintain compared with individual stalls access systems.

Net income

It is important that the net income is not a profit as there are other costs associated with public maintenance not included in these calculations.

For instance, other costs include;

- There is a hygiene service contract which is not included here as it would be required for either insourcing or outsourcing models.
- Maintenance and repairs costs as a result of vandalism are not included here and currently managed by the Property Team
- Maintenance, minor repairs and cleaning of the public convenience

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PUBLIC CONVENIENCES

Town and Parish Councils Responses



Site	Parish	Would take on responsibility?	Notes
Oare Gunpowder Works Visitors Centre	Faversham Town Council	Yes	Also interested in Faversham Recreation Ground
Central Car Park		Yes	
Rose Street	Sheerness Town Council	Yes	Council tax precepts to be recalculated
Beachfields		Yes	
Leysdown Beach Services	Leysdown Parish Council	Yes	Serve the large population of seasonal visitors to Leysdown in the summer months
The Spinney		Yes	
Queenborough Park	Queenborough Town Council	Maybe	Facilities well used

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PUBLIC CONVENIENCES

Local Businesses Interested in Community Toilet Scheme



Business	Parish / Town Council	Are you interested in the proposed scheme?	Opening Hours
West Faversham Community Centre	Faversham Town Council	Yes	Monday to Friday 08:30 – 22:00 Saturday, Sunday & Bank Holidays 08:30 – 15:00
McDonalds	Non-Civil Parish	Yes	24hrs
McDonalds	Bobbing Parish Council	Yes	Monday to Saturday 08:am – 18:00
Morrisons Supermarket	Queenborough Town Council	Yes	Monday to Saturday 07:00 – 22:00 Sunday 10:00 – 16:00
The Three Hats	Non-Civil Parish	Yes	Monday to Sunday 12:00 – 22:00
Castle Connections	Queenborough Town Council	Yes	Monday to Sunday various

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Equality Impact Assessment

An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in decision-making.

When to assess

An EIA should be carried out when you are changing, removing or introducing a new service, policy or function. The assessment should be proportionate; a major financial decision will need to be assessed more closely than a minor policy change.

Public sector equality duty

The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:

- 1) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- 2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- 3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

These are known as the three aims of the general equality duty.

Protected characteristics

The Equality Act 2010 sets out nine protected characteristics that apply to the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership*
- Pregnancy and maternity
- Ethnicity
- Religion or belief
- Sex
- Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

We also ask you to consider other socially excluded groups, which could include people who are geographically isolated from services, with low literacy skills or living in poverty or low incomes; this may impact on aspirations, health or other areas of their life which are not protected by the Equality Act, but should be considered when delivering services.

Due regard

To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.

How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general equality duty to the decision or function in question. The greater the relevance and potential impact, the higher the regard required by the duty. The three aims of the duty may be more relevant to some functions than others; or they may be more relevant to some protected characteristics than others.

Collecting and using equality information

[The Equalities and Human Rights Commission](#) (EHRC) states that 'Having due regard to the aims of the general equality duty requires public authorities to have an adequate evidence base for their decision making'. We need to make sure that we understand the potential impact of decisions on people with different protected characteristics. This will help us to reduce or remove unhelpful impacts. We need to consider this information before and as decisions are being made.

There are a number of publications and websites that may be useful in understanding the profile of users of a service, or those who may be affected.

- The Office for National Statistics Neighbourhoods website <https://www.ons.gov.uk/>
- Kent County Council Facts and Figures about Kent <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent>
- Public health and social care data http://www.kpho.org.uk/search?mode=results&queries_exclude_query=no&queries_excludefromsearch_query=yes&queries_keyword_query=Swale

At this stage you may find that you need further information and will need to undertake engagement or consultation. Identify the gaps in your knowledge and take steps to fill these.

Case law principles

A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The person completing the EIA should have knowledge and understanding of the service, policy, strategy, practice, plan.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- A public authority is responsible for ensuring that any contracted organisations which provide services on their behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice.
- The duty is a continuing one. It applies when a service, policy, strategy, practice or plan is developed or agreed, and when it is implemented or reviewed.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- The general equality duty is not a duty to achieve a result, it is a duty to have due regard to the need achieve the aims of the duty.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

Lead officer:	Andre Bowen, Service Improvement & Project Manager
Decision maker:	Environment and Climate Change Committee
People involved:	<i>Who is involved in this EIA?</i>
Decision: <ul style="list-style-type: none">• Policy, project, service, contract	<ul style="list-style-type: none">• Public Convenience Service• Changing Service

<ul style="list-style-type: none"> Review, change, new, stop 	
<p>Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.</p>	<p><i>What date is it going to SMT/Cabinet or Council?</i> <i>NB. SMT will want to see a EIA attached even if the final decision lies with Cabinet or Council</i></p>
<p>Summary of the decision:</p> <ul style="list-style-type: none"> Aims and objectives Key actions Expected outcomes Who will be affected and how? How many people will be affected? 	<p>A full review of the public conveniences provision to ultimately match the service with the resources in the medium term financial plan. Central and local government, the business community and commercial sector, voluntary and community organisations, local communities and interest groups: all share a common ambition to create quality places where people can thrive. By working in partnership, and adapting a range of approaches to the needs of different areas, significant financial and non-financial benefits can be achieved.</p> <p>The key actions are;</p> <ol style="list-style-type: none"> The closure of 3 public conveniences. To undertake formal negotiations to transfer 7 public conveniences to Town and Parish Councils or other appropriate local organisations. Introduce a Community Toilet Scheme. Retender for 26/27 onwards for the remaining (6 public convenience). <ol style="list-style-type: none"> And potentially those not transferred under recommendation 2 Consider exploring opportunities to improve the condition of the remaining public conveniences, while improving energy and water efficiency where applicable. <p>The expected outcomes include;</p> <ul style="list-style-type: none"> Support the Corporate Plan objective of 'Running the Council' by working within our resources, and delivering in a transparent and efficient way. Support the Corporate Plan objective of 'Community', enabling our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience. Support more local businesses to take part in a community toilet scheme, leading to more public toilet options available for residents and visitors. This can make areas more attractive to tourists, enhancing the overall visitor experience. To transfer public conveniences to Town and Parish Councils who can maintain them on behalf of the people in the respective parish/town, where they have a responsibility for the well-being of its local community. <p>Any member of the public, including residents, visitors and tourists will be affected.</p> <p>The proposed closure of 3 public conveniences will predominantly affect wards; Library Car Park – Homewood (6,340), The Forum – Chalkwell (3,990), Milton Regis High Street - Milton Regis (6,180), The Spinney – Sheppey East (8,355) and The White House - Minster Cliffs (7,862). Totally between 16,510 and 22,575 residents.</p>

Information and research: <ul style="list-style-type: none"> Outline the information and research that has informed the decision. Include sources and key findings. Include information on how the decision will affect people with different protected characteristics. 	<p>The preferred option aims to match the service with the resources in the medium term financial plan taking into account the footfall, costs, condition, level of antisocial behaviour and opportunities available in the local and national context. That is;</p> <ul style="list-style-type: none"> Determined the usage of public conveniences within the borough Determine the estimated condition and estimated maintenance costs (from wear and tear and vandalism) Compared public conveniences of neighbouring boroughs and national context Consulted with Town and Parish Councils Explored alternative uses and models of operation for public conveniences Recommended the most advantageous solution. Ultimately to match the service with the resources in the medium term financial plan Consult with members of the public on the proposed changes (planned) Consulted potential businesses suitable for the proposed Community Toilet Scheme
Consultation: <ul style="list-style-type: none"> Has there been specific consultation on this decision? What were the results of the consultation? Did the consultation analysis reveal any difference in views across the protected characteristics? Can any conclusions be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>Of the Town and Parish Councils consulted, 4 have expressed an interest in maintaining the public conveniences in their respective towns/parishes.</p> <p>6 businesses have expressed an interest in allowing members of the public to use their toilets without purchasing any goods or paying a fee.</p> <p>Responses to the public consultation are likely to highlight that closures could have an impact on the elderly, people with a disability, pregnant women and children. There is also the possibility that it could impact on tourism.</p>

Is the decision relevant to the aims of the equality duty?

Guidance on the aims can be found in the EHRC's PSSED Technical Guidance -

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

Aim	Yes/No
1) Eliminate discrimination, harassment and victimisation	No
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	No

Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Characteristic	Relevance to decision High/Medium/Low/None	Impact of decision Positive/Negative/Neutral
Age	Medium	Negative
Disability	Medium	Negative

Gender reassignment	None	Neutral
Marriage and civil partnership	None	Neutral
Pregnancy and maternity	Medium	Negative
Ethnicity	None	Neutral
Religion or belief	None	Neutral
Sex	None	Neutral
Sexual orientation	None	Neutral
Other socially excluded groups ¹	None	Neutral

Conclusion:

- Consider how due regard has been had to the equality duty, from start to finish.
- There should be no unlawful discrimination arising from the decision.

Advise on the overall equality implications that should be taken into account in the final decision, considering relevance and impact.

Summarise this conclusion in the body of your report

The closure of the public toilets could impact more on particular groups, including older people, families with small children, disabled people and pregnant women

Age - the incidence of disability and health related issues increase with age. Older people may be disproportionately affected by conditions that require them to use toilet facilities more frequently.

Younger people - families with young children may be affected by a reduction in facilities generally, and in particular if there is a loss of facilities with baby changing areas.

Disability - Availability of public toilets can impact on disabled people taking part in everyday activities, in particular people with specific conditions which require frequent use of facilities (eg Colitis, Crohn's Disease, IBD, Prostate Cancer). People who require accessible toilets could also be disproportionately impacted by the closure of such facilities - both in the sense of availability of disabled toilet facilities and also location for people with mobility problems.

Pregnancy - pregnant women are also more likely have frequent use of toilet facilities.

The extent of impact would also depend on whether specific facilities are affected (eg accessible toilets, those with baby changing facilities) and the proximity of alternative facilities.

The Council does not have a statutory responsibility to provide public conveniences, but in order to continue to be able to provide a service it is proposed to close a number of facilities rather than closure of all facilities.

There could be negative impact for service users and this may disproportionately impact on some groups including older people and disabled people. The decision needs to be considered in the context of a requirement for significant savings to be found by the Council and whether this is a proportionate means of achieving a legitimate aim, i.e. the requirement for the Council to balance its budget.

Further promotion of the Community Toilet Scheme to encourage local businesses to make facilities available to the public, or for communities to take responsibility for public conveniences. Also the promotion and publicity of Community Toilet Scheme facilities.

¹ Other socially excluded groups could include those with literacy issues, people living in poverty or on low incomes or people who are geographically isolated from services

Timing

- Having 'due regard' is a state of mind. It should be considered at the inception of any decision.
- Due regard should be considered throughout the development of the decision. Notes should be taken on how due regard to the equality duty has been considered through research, meetings, project teams, committees and consultations.
- The completion of the EIA is a way of effectively summarising the due regard shown to the equality duty throughout the development of the decision. The completed EIA must inform the final decision-making process. The decision-maker must be aware of the duty and the completed EIA.

Full technical guidance on the public sector equality duty can be found at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

Please send the EIA in draft to Janet Dart in the Comms and Policy Team (janetdart@swale.gov.uk) who will review it with colleagues and let you have any comments or suggested changes.

This Equality Impact Assessment should form an appendix to any EMT/SMT or committee report relating to the decision, and a summary should be included in the 'Equality and Diversity' section of the standard committee report template under 'Section 6 – Implications'.

Public Toilet Facilities Consultation

This printed survey is for Swale residents and visitors. Community groups and businesses should use the online version at <https://swale.gov.uk/your-council/consultations/toilets>



Public Toilets

1) Which, if any, of the following public toilets have you previously used?

- ☐ Library Car Park, Sittingbourne
- ☐ The Forum, Sittingbourne
- ☐ Milton Regis High Street, Milton Regis
- ☐ The Spinney, Leysdown
- ☐ The White House, Minster
- ☐ None of the above
- ☐ Don't know

2) Which, if any, of the following public toilets do you use regularly?

	Always	Often	Sometimes	Rarely	Never
Library Car Park, Sittingbourne	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Forum, Sittingbourne	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Milton Regis High Street, Milton Regis	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Spinney, Leysdown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The White House, Minster	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3) Was the toilet in acceptable condition on your last visit?

- ☐ Yes
- ☐ No
- ☐ N/A

4) If no, please explain?

Public Toilets

5) I consider the following public toilets to be important?

	Strongly disagree (1)	Disagree (2)	Neutral (3)	Agree (4)	Strongly agree (5)
Library Car Park , Sittingbourne	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Forum , Sittingbourne	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Milton Regis High Street , Milton Regis	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Spinney , Leysdown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The White House , Minster	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6) Would the closure of any of the facilities impact your daily life due to any of the following?

- | | |
|--|---|
| <input type="checkbox"/> A long term physical or mental ill-health / disability | <input type="checkbox"/> Caring for children |
| <input type="checkbox"/> Long standing illness or condition (such as Crohn's disease, urinary incontinence, cancer, chronic heart disease, diabetes or epilepsy) | <input type="checkbox"/> Problems related to ageing |
| <input type="checkbox"/> Pregnancy | <input type="checkbox"/> No impact |

7) In your opinion, acknowledging closures have to happen, which of the below public toilets should be closed?

- ☐ **Library Car Park**, Sittingbourne
- ☐ **The Forum**, Sittingbourne
- ☐ **Milton Regis High Street**, Milton Regis
- ☐ **The Spinney**, Leysdown
- ☐ **The White House**, Minster

8) Please tell us why you chose those public toilet(s)?

9) Would you like to see more businesses allow the public to use their facilities free of charge during their operating hours?

- ☐ Yes ☐ No

10) Are there any reasons why Town or Parish Councils or other appropriate local organisations should not manage the public toilets in their respective areas?

Public Toilets

11) Do you have any additional comments or suggestions regarding the future of public toilets?

Demographics

12) In what role are you responding to this survey?

- ☐ Swale resident ☐ Swale visitor
☐ Representative of a VCS/
charity/ community group ☐ Representative of a business
or private sector organisation ☐ Other: _____

13) How would you describe yourself?

- ☐ Female ☐ Male ☐ Prefer not to say ☐ Other: _____

14) Is the gender you identify with the same as your sex registered at birth?

- ☐ Yes ☐ No ☐ Prefer not to say

15) What is your age?

- ☐ 17 years old or under ☐ 18-24 ☐ 25-34 ☐ 35-44
☐ 45-54 ☐ 55-64 ☐ 65-74 ☐ 75-84
☐ 85 or above ☐ Prefer not to say

16) Do you consider yourself to have a disability?

- ☐ Yes ☐ No ☐ Prefer not to say

17) What is your ethnic group

- | | | | | |
|--|--|--|--|--|
| <input type="checkbox"/> Asian – Arab | <input type="checkbox"/> Asian – Bangladeshi | <input type="checkbox"/> Asian – Chinese | <input type="checkbox"/> Asian – Indian | <input type="checkbox"/> Asian – Pakistani |
| <input type="checkbox"/> Black – Black African | <input type="checkbox"/> Black – Black Caribbean | <input type="checkbox"/> White – White British | <input type="checkbox"/> White – White Irish | <input type="checkbox"/> Mixed – Asian and White |
| <input type="checkbox"/> Mixed – Black African and White | <input type="checkbox"/> Mixed – Black Caribbean and White | <input type="checkbox"/> Traveller – Gypsy | <input type="checkbox"/> Traveller – Irish Traveller | <input type="checkbox"/> Traveller – Romany |
| <input type="checkbox"/> Prefer not to say | <input type="checkbox"/> Other: _____ | | | |

Demographics

18) How would you describe your sexual orientation?

- ☐ Heterosexual (straight) ☐ Bisexual ☐ Gay man or Lesbian ☐ Prefer not to say ☐ Other: _____

19) How would you describe your religious beliefs?

- ☐ Christian ☐ Buddhist ☐ Hindu ☐ Jewish ☐ Muslim
☐ Sikh ☐ No religion ☐ Prefer not to say ☐ Other: _____

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Report title, background information and recommendation(s)	Date of meeting	Open or exempt	Lead Officer and report author
Waste Collection and Street Cleansing Service Update	12 November 2025	Open	Head of Service: Martyn Cassell Report Author: Alister Andrews
Climate and Ecological Emergency Action Plan Annual Report	12 November 2025	Open	Head of Service: Martyn Cassell Report Author: Janet Hill
Parking Services Annual Report	12 November 2025	Open	Head of Service: Martyn Cassell
Swale Environmental Health Enforcement Policy	12 November 2025	Open	Head of Service: Duncan Haynes Report Author: Clare Lydon
Open Spaces Strategy – public consultation and approval	TBC	Open	Head of Service: Martyn Cassell Report Author: Jay Jenkins
Stray Dog kennel contract	TBC	Open	Head of Service: Martyn Cassell Report Author: Michelle Sampson
Litter Enforcement Service Review	TBC	Open	Head of Service: Martyn Cassell

Forward Decisions Plan: Environmental Services and Climate Change Committee 2025 – July 2025

			Report Author: Alister Andrews
Impact of Local Government Reorganisation on Council Environment Priorities and Projects	TBC	Open	Head of Service: Martyn Cassell
Public Toilets consultation update and new service approval	TBC	Open	Head of Service: Martyn Cassell

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