

Comments from Policy Development & Review Committee for consideration within the Swale Strategic Air Quality Action Plan 2018-22:

Comment from PDRC and Service Lead	Reduction in NOx	External Partner involvement	Response and Action
Planning Policy & Development Management			
1. That tree planting be carried out on a lose one, plant one basis;	No – only a visual measure; little or no effect on emissions	No	Swale currently has a Local Plan policy DM 29 that requires replacement of lost trees. This applies to new development not trees or hedgerows lost due for agricultural purposes or to areas not covered by Tree Preservation Orders / Conservation Areas.
2. That a SBC parking policy be adopted as soon as possible, to enable better parking and less ‘pinch points’;	Yes if introduced	No	The Swale Planning Policy team is currently commissioning consultants to prepare a Vehicle Parking Supplementary Planning Document. This will involve a Members’ workshop and general consultation
3. That it be recognised that all major development in Swale would have an impact on the A2;	Yes	Yes	The detailed assessments being undertaken for the Strategic AQAP and Traffic Modelling for the Local Plan may indeed draw this conclusion however this assumption cannot be pre-empted until the work has been completed.
4. That methods be sought to enforce Travel Plans	Yes if followed up	Yes	The AQ Steering Group will consider the mechanisms available to the council and whether they could be enforced in tandem with other measures e.g. low emission zones or congestion charging.

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5. That it be made easier to plan and do walking in the Borough, with a link to tourism;	No	Yes	The AQ Steering Group will consider the leavers available to implement this goal. Currently the local plan, planning decisions and other council functions contribute to this
6. That all Committees, particularly Licensing and Planning take environmental issues into consideration;	No	Yes	Changes to the implications section of reports are being proposed by Policy and Performance. The current section does refer to environment but it is intended that the revision will expressly guide authors to consider air quality. This section should identify any sustainability and environmental implications, including air quality arising from the proposals in the report. Details of any environmental or sustainability appraisal planned or undertaken should also be provided. Further guidance on this section can be obtained from the Policy and Performance team.
7. That planning conditions need to be placed on all diggers and lorries (Euro 4 or above);	No	No	An issue for discussion at the AQ Steering Group, however it is questionable whether such a standard could be enforceable and under what powers. There are schemes that promote good practice such as the Considerate Builder Scheme that may better placed to deliver protection of the environment.
8. That new developments be built to higher efficiency ratings to decrease fuel use	Yes	Yes	Unfortunately the Code for Sustainable Homes has been scrapped by government and there is no obvious mechanism for achieving this quickly. The Local Plan / new settlement work currently being undertaken will investigate whether the Home Quality

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			Mark can achieve better efficiency rates. However evidence and viability studies will be required to support its inclusion.
9. That good working practices be replicated where possible;	Unknown	Yes – should already be occurring	Officers attend national seminars and training events on air quality. In addition they work closely with colleagues from other Kent authorities to ensure that good working practices are adopted and replicated from other areas of the country where local needs are identified. An example being the implementation of the Air Quality Technical Guidance which stemmed from work undertaken in West Yorkshire
KCC – Taxi and Bus Contracts/Education-Schools			
10. That partners providing services, e.g. provision of taxis for taking children to school, and bus companies, consider the fuel that is being used;	Yes if feasible to introduce	Yes	The AQ Steering Group will pursue discussions with KCC on the viability of this proposal.
11. That more travel plans be put in place for schools;	As above	Yes	The AQ Steering Group will pursue discussions with KCC on the viability of this proposal.
12. That 'on-demand' bus service initiatives should be looked into;	Not sure	Yes	The AQ Steering Group will pursue discussions with KCC on the viability of this proposal, taking into consideration the impact this type of service may have on the licensed taxi trade within the borough.

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Swale Vehicle Licensing			
13. That taxi and bus licensing to improve to be more 'green';	Yes if introduced	Yes	The AQ Steering group will discuss this recommendation with Licensing Services and through the Local Bus Partnership.
KCC Highways /Highways England			
14. That bus stop lay-bys be added to enable vehicle flow;	Possibly	Yes	Swale is not in a position to commit or deliver this recommendation. However the AQ Steering group will liaise with KCCH and other services to explore the cost benefit of such schemes at key points along the A2.
15. That by-passes be constructed;	Yes if introduced	Yes	The need and 'business case' for any 'by-pass' would need to be justified through evidence and supported through the safeguarding of land in the emerging Local Plan and would need support from KCC Highways and/or Highways England.
16. That pot-holes be fixed to allow free-flowing traffic;	Unlikely	Yes	Repair and resurfacing of highways is a function of the county.
17. That there be pedestrian bridges at congestion points;	Yes if introduced	Yes	Swale is not in a position to commit or deliver this recommendation. However the AQ Steering group will liaise with KCC Highways and other services to explore the cost benefit of such schemes at key points along the A2. Wider considerations of accessibility/access measures (e.g. to providing level access), potential effect of

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			increasing traffic speeds and consequent reduction in road safety. In addition there is the impact on amenity and street scene?
Economic Development			
18. That varying shift hours be encouraged to allow free-flowing traffic;	Possible	Yes	The AQ Steering Group working with Economic Development and Development Management decision will consider the viability of including this option in current and future commercial developments.
Environmental Health			
19. That developments over 100 properties have air quality monitoring on-site prior to houses being built;	Yes, but at considerable cost	No	<p>Careful consideration of this proposal suggests that it would impractical to implement given that Swale has limited control over when developments occur and the need to collect data for a year or more to establish the 'local background' levels.</p> <p>Background levels are already available from Defra, and this is available to consultants and officers modelling purposes.</p>
20. That areas be actively air quality monitored;	Yes, but depends on the area(s) selected	Possibly	<p>Swale BC have a comprehensive air quality monitoring (more than other Kent authority) we have three continuous monitoring stations based in Ospringe, St Paul's and Newington with efficient equipment used to monitor both NOx and PM10. In addition we have approximately 65 to 70 Nitrogen Dioxide tubes located at many sites along the A2 and other major roads in the borough. Each location is reviewed and assessed annually to ensure that we monitor areas where there is potential for exceedances of the 40 mg level.</p> <p>Active management of locations is something Defra</p>

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			expects.
21. That a sixth AQMA be made in Key Street, Sittingbourne;	Not known	No	Declaring an Air Quality Management Area has to, by law, follow a process which meets Defra criteria. It is evidence based and collected over a minimum of a year. We also have to establish that people (receptors) living in the vicinity are exposed to the levels of pollutants above the national standard. The declaration has to be approved by Defra and then formally adopted by Swale BC.
22. That the Action Plan has a forward projection on traffic modelling to factor in additional traffic, as part of the planning process;	Yes	Yes	<p>Establishing a strategic air quality action plan will enable the council to approach the issue of poor air quality in a holistic way which will include the impact of the developments included in the current Local Plan, Bearing Fruits. Our air quality consultant is working with the traffic modelling specialist being used by Planning Policy on the phasing of future development scenarios.</p> <p>We have a closer collaboration between Planning Policy and Environmental Protection's air quality work as a result of the work undertaken for the Strategic AQAP.</p>
23. That there should be strict policy that all air quality or traffic modelling consultations be carried out by independent persons;	Yes if accepted	Yes	Most if not all air quality reports provided by developers are prepared by independent consultants. If an initial assessment of the report identified that the consultant was not a 'competent' person the report would be rejected by them.
24. That there be interaction with	Yes	Yes	Environmental Protection already engage with developers over mitigation measures to be included in

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developers about changes they are doing, e.g. electric vehicle charging points;			<p>the conditions for development, particularly for larger developments. The Air Quality Technical Guidance adopted by Swale contains a formula and is a standard widely used across Kent.</p> <p>KCC are assessing a policy on electric charging points within the wider current infrastructure across the county in existing car parks (KCC ownership and or private ownership). Officers are liaising with them on this matter.</p>
25. That local incentives be given for electric vehicle charging points, a strategic plan was needed;	Yes but not in the short term.	Yes	A strategic policy for Swale could be considered to link in to the work being undertaken by KCC (see above). The issue can be brought to the AQ Steering Group with officers from Economic Development, Parking Services and Planning Policy to consider the viability of the proposal.
26. That Town Councils also be consulted, as well as parish councils (on AQAP)	N/A	No	There will be full consultation which will include Town and Parish Councils on any proposals under the Strategic Air Quality Action Plan.
27. That residents living along the A2 be consulted (on AQAP)	N/A	No	<p>The planning consultation process is set out in the Statement of Community Involvement (adopted 2018). Local Town and Parish Councils and neighbours are consulted on local planning applications and interested members of the public can register for the Public Access System to track the progress of planning applications https://www.swale.gov.uk/statement-of-community-involvement/</p> <p>Full consultation will include the public and residents living along the A2 on any proposals under the Strategic</p>

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28. That major enterprises on the Eurolink industrial area be consulted (on AQAP)	No	No	<p>Air Quality Action Plan.</p> <p>The planning consultation process is set out in the Statement of Community Involvement (adopted 2018). Local Town and Parish Councils and neighbours are consulted on local planning applications and interested members of the public can register for the Public Access System to track the progress of planning applications https://www.swale.gov.uk/statement-of-community-involvement/</p> <p>Full consultation will include business interest that may be impacted by proposals under the Strategic Air Quality Action Plan.</p>
29. That there must be a continuous dialogue about Section 106 agreements and Community Infrastructure Levies;	Yes if followed	Yes	<p>SBC has not yet resolved whether to progress a Community Infrastructure Levy. Planning Conditions and S106 Agreements provide a means to mitigate AQ issues.</p> <p>Environmental Protection Officers and Planners are working closely to ensure that each development Provides the appropriate S.106 obligations in accordance with Government regulations (CIL Tests).</p> <p>In addition the Air Quality Technical Guidance provides a framework for mitigation measures appropriate to each development.</p>