



Swale Borough Council Air Quality Action Plan (2018 – 2022)

Introduction

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

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

Since late 2017 I have been chairing an Air Quality Steering Group which is responsible for the implementation and monitoring of the delivery of the AQAP to ensure measures are kept on-track.

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

The Steering Group has undertaken very extensive AQ monitoring commissioned from leading independent external consultants.

This monitoring has shown that three of the five AQMA's in St Paul's, Teynham and Newington will have sufficiently improved air quality by 2020 or 2022 to be fully compliant, and that additional measures are required for East Street and St Paul's. However, the measures that the Council is consulting on will have a beneficial impact across the whole borough.

In this draft AQAP we outline how we plan to effectively tackle air quality issues within the Council's control.

This approach reflects the high priority the Council has for improving AQ in the borough and engaging with our residents and community and business groups to achieve this objective.

David Simmons

Cabinet Member for Environment & Rural Affairs

AQAP Measures

The proposed measures set-out in this Strategic AQAP are structured as follows:

- **Strategic AQAP measures:** those wider strategic measures which are to be implemented across the borough with strategic delivery partners

and

- **Local AQMA measures:** those measures which will be focussed specifically within each AQMA which will support and compliment the strategic measures.

The Swale Council Strategic AQAP measures which includes strategic and locally focussed AQMA measures. The estimated cost of implementing key action, the Clean Air Zone (CAZ), will require a full CAZ feasibility study after the AQAP submission.

Strategic AQAP measures

Key strategic measures that need to be considered across the AQMA and Swale as a whole are those that target:

- Emission reductions from the HGV fleets;
- Volume reductions in the HGV fleet using the A2 especially through the 2 key AQMAs (East Street and Ospringe target year 2022);

- Smoother less congested traffic flows of all vehicles through the AQMAs;
- Policies that encourage only low emission developments being approved; and
- Encourage alternative modes to car use to reduce congestion and pollution

These strategic measures will be implemented through the following measures:

- Clean Air Zone:
 - Non-charging/charging CAZ (feasibility to be assessed);
 - “Clear air signage and information scheme”; and
 - Includes HGV retro-fit programme with Eco-Stars programme.
- Revised and updated Planning Guidance on Air Quality for Developments and Low Emission Strategy:
 - Includes guidance on minimum requirements for electric vehicle infrastructure;
 - To include biomass boilers, diesel generators, construction vehicles, ventilation guidance; and
 - Costed emission mitigation requirements to assess emissions.

Local focussed AQMA measures

Key locally focussed measures that are to be introduced into individual AQMAs are those that target localised:

- Initiatives that inform and protect local residents;
- Smooth traffic flows causing less congestion of all vehicles through the AQMAs;
- Freight management and access policies within AQMAs; and
- Access to cleaner alternative transport for residents and businesses from freight and other traffic.

Appendices

Appendix I Air Quality Action Plan Measures: Strategic AQAP measures

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Appendix I Air Quality Action Plan Measures: Strategic AQAP measures

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
1.	HGV “Clean Air Corridor”	Promoting Low Emission Transport	Low Emission Zone (LEZ) or Clean Air Zone (CAZ)	KCC/SBC	2019	2020 – 2022	Reduction in pre-Euro VI HGV	(2022 target) 6.8 µg.m ⁻³ East St, 1.5 µg.m ⁻³ Ospringe,	To start	2022	Create a HGV (Euro emission class) restriction zone along A2 with strategic ANPR cameras.
2.	“Clean Air Corridor” signage and information scheme”	Freight and Delivery Management	Route Management Plans/ Strategic routing strategy for HGV’s	KCC	2019	2019 – 2022	Reduction in pre-Euro VI HGV	Part of measure 1.	To start	2022	Roadside information includes “switch-off engine” congestion information signage information on A2
3.	Air Quality and Low Emission Strategy	Policy Guidance and Development Control	Low Emissions Strategy	SBC	2019	2019 – 2022	Developments with LES	Unquantifiable	Revision 2018/19		LES (includes sustainable procurement, SBC fleet improvements, low emission fuels, construction vehicles and installation (STOR) guidance)
4.	Swale Freight Management Plan (2016)	Freight and Delivery Management	Delivery and Service plans	KCC	2016	2018- 2022		Unquantifiable , contributes to measure 1	On-going		KCC and SBC to support Swale FMP by delivering recommendations (section 5)

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
5.	Eco Stars	Vehicle Fleet Efficiency	Driver training and ECO driving aids	SBC	2014	2019-2022	Number of HGV and LGV drivers taken through scheme.	Part of measure 1			Ecostars pilot continues in 2017 (Initially 14 companies signed up in Swale with 812 vehicles)
6.	Air pollution alerts and information	Public information	Via other mechanisms	SBC	-	2018 – 2022	Number of (vulnerable) people using the alert service in Swale	n/a			Communications and marketing directed to vulnerable people (COPD) and information on health effects Use business forums to promote best eco practices for travel
7.	KCC development control policies	Policy Guidance and Development Control	Low Emissions Strategy	KCC	2018/19	2019 – 2022	Controlled parking allowances for developments	n/a	In progress	On-going	KCC have developed low emission parking and electric vehicle infrastructure requirement policy

Appendix II Air Quality Action Plan Measures: Local AQAP measures

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
8.	"20 plenty" zones	Traffic Management	Reduction of speed limits, 20mph zones	KCC	2019	2020 - 2022	Number of zones	Unquantifiable	To consult	2022	Community steering group proposal to be evaluated. (AQMA's: 1,2,3,4,5)
9.	Pinch-point parking alternatives (red-route)	Traffic Management	Parking Enforcement on highway	KCC	2019	2020 -2022	A2 parking space reduction	Unquantifiable	Consultation to start	2022	Remove pinch point A2 parking by providing alternate off-street parking and/or camera enforcement of loading bays (AQMA's: 1,2,4, 5) The Swale Planning Policy team is preparing a Vehicle Parking Supplementary Planning Document. This will involve a Members' workshop and general consultation

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
10.	Local LEV car-club	Promoting Low Emission Transport	Other	SBC	2019	2020 – 2022	LEV car club vehicle no.	Unquantifiable	Yet to start review	Ongoing	Set-up low emission community car club or car-share scheme for AQMA's (AQMA's: 1,2,4, 5)
11.	Local school and business travel plans	Promoting travel alternatives	Promotion of walking and cycling and travel plans	KCC (+ PH SBC)	2019	2013 Swale already participating in the Kent Travel scheme and involved in Better business for all	% participant in Kent smarter travel challenge recorded by KCC	Unquantifiable	Annual bids to the KCC	Ongoing	Community steering group proposal to be consulted on.(AQMA's: all)
12.	Quiet delivery zones	Freight and delivery management	Quiet and out of hours delivery	KCC	2019	2020 – 2022	Number of quiet delivery zones	Unquantifiable	To consult on	2020	Community steering group proposal to be evaluated. School and night-time hours restricted freight delivery times for noise and AQ. (AQMA's: all)

Appendix III Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response

If you have any comments please respond to:

Address

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

Email steve.wilcock@midkent.gov.uk

Appendix IV Policy and Development Committee Comments

Recommendation and Service Lead	Reduction in NOx	External Partner involvement	Response
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. Tree policy being updated.
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	No	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.
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	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.

Recommendation and Service Lead	Reduction in NOx	External Partner involvement	Response
into consideration;			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	The legal powers of the Council to decide on this or condition it will be followed up by the AQ Steering Group.
8. That new developments be built to higher efficiency ratings to decrease fuel use	Yes	Yes	<p>The Code for Sustainable Homes has been scrapped by government and there is no obvious mechanism for achieving this quickly.</p> <p>The Local Plan / new settlement work currently being undertaken will investigate whether the Home Quality Mark can achieve better efficiency rates. However evidence and viability studies will be required to support its inclusion.</p>
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	Yes if feasible to introduce	Yes	The AQ Steering Group will pursue discussions with KCC on the viability of this proposal.

Recommendation and Service Lead	Reduction in NOx	External Partner involvement	Response
used;			
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.
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 KCC 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			Swale is not in a position to commit or deliver this recommendation.

Recommendation and Service Lead	Reduction in NOx	External Partner involvement	Response
bridges at congestion points;	Yes if introduced	Yes	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 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	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. Background levels are already available from Defra, and this is available to consultants and officers modelling purposes.
20. That areas be actively air quality monitored;	Yes, but depends on the area(s) selected	Possibly	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 ug level. Active management of locations is something Defra 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. Swale BC has introduced additional testing

Recommendation and Service Lead	Reduction in NOx	External Partner involvement	Response
			tubes in the area.
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 developers about changes they are doing, e.g. electric vehicle charging points;	Yes	Yes	<p>Environmental Protection already engage with developers over mitigation measures to be included in 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	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

Recommendation and Service Lead	Reduction in NOx	External Partner involvement	Response
needed;			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	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/ Full consultation will include the public and residents living along the A2 on any proposals under the Strategic Air Quality Action Plan.
28. That major enterprises on the Eurolink industrial area be consulted (on AQAP)	No	No	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/ Full consultation will include business interest that may be impacted by proposals under the Strategic Air Quality Action Plan.
29. That there must be a continuous dialogue about Section 106 agreements and Community Infrastructure Levies;	Yes if followed	Yes	SBC has not yet resolved whether to progress a Community Infrastructure Levy. Planning Conditions and S106 Agreements provide a means to mitigate AQ issues. 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). In addition the Air Quality Technical Guidance provides a framework for mitigation measures appropriate to each development.

Appendix V AQMA location maps

Figure C 1 AQMA 1: Newington AQMA map

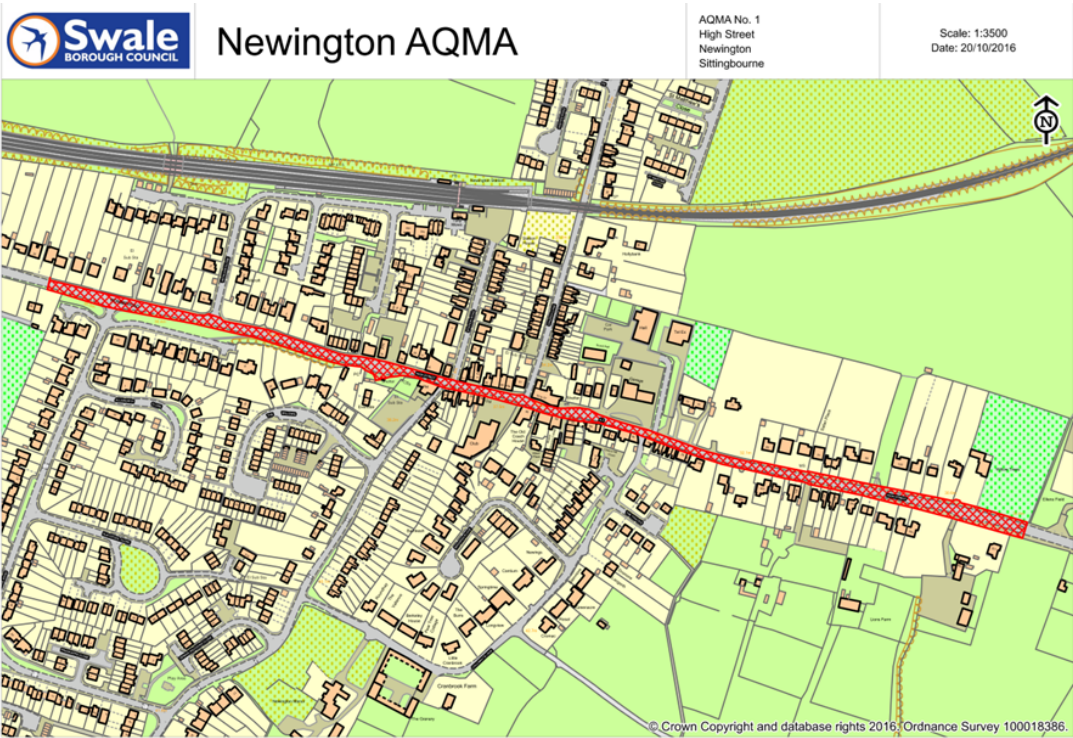


Figure C 2 AQMA 2: Ospringe AQMA map

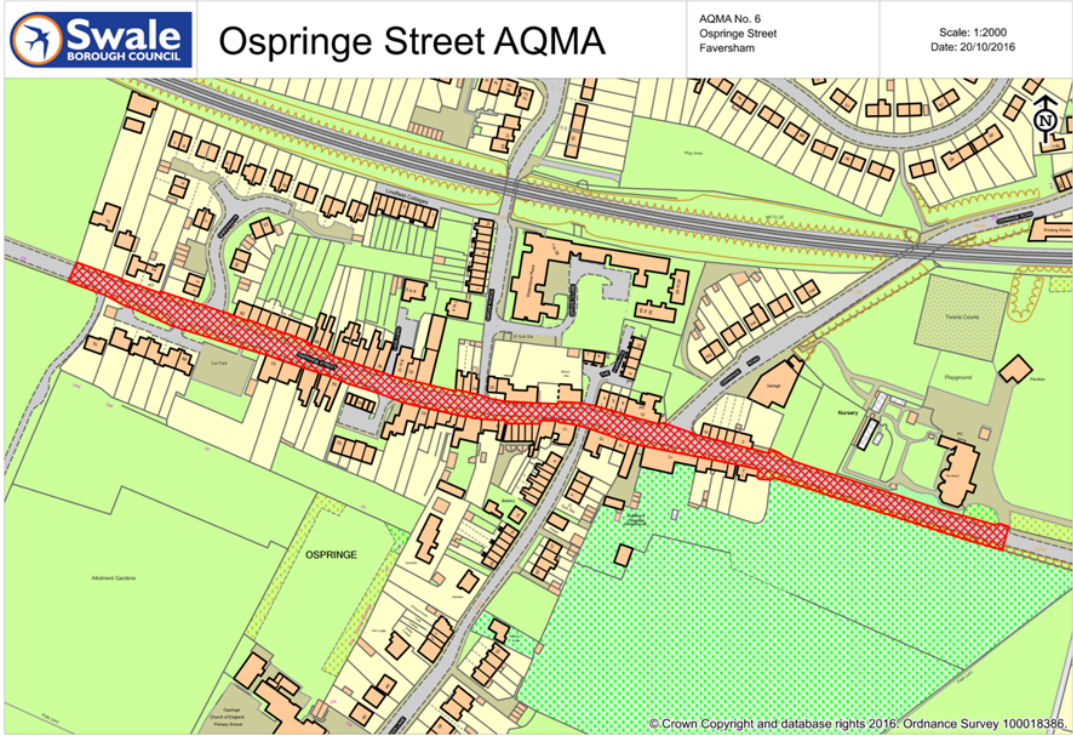


Figure C 3 AQMA 3: East Street AQMA map



Figure C 4 AQMA 4: St Paul's AQMA

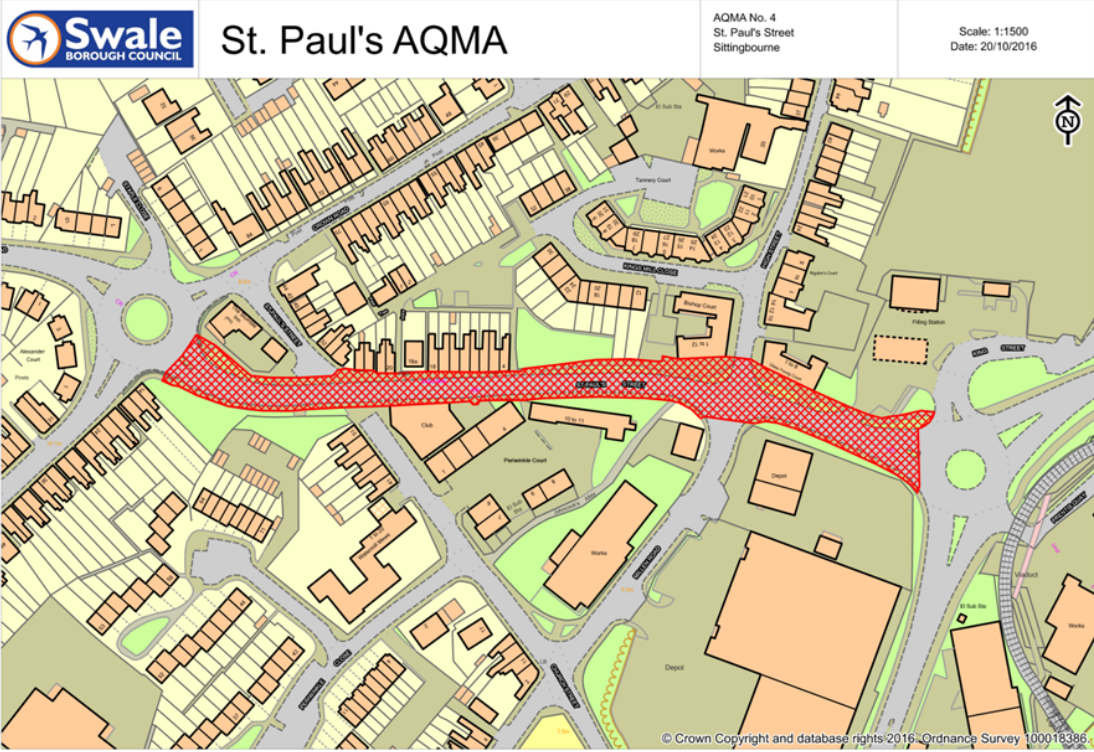
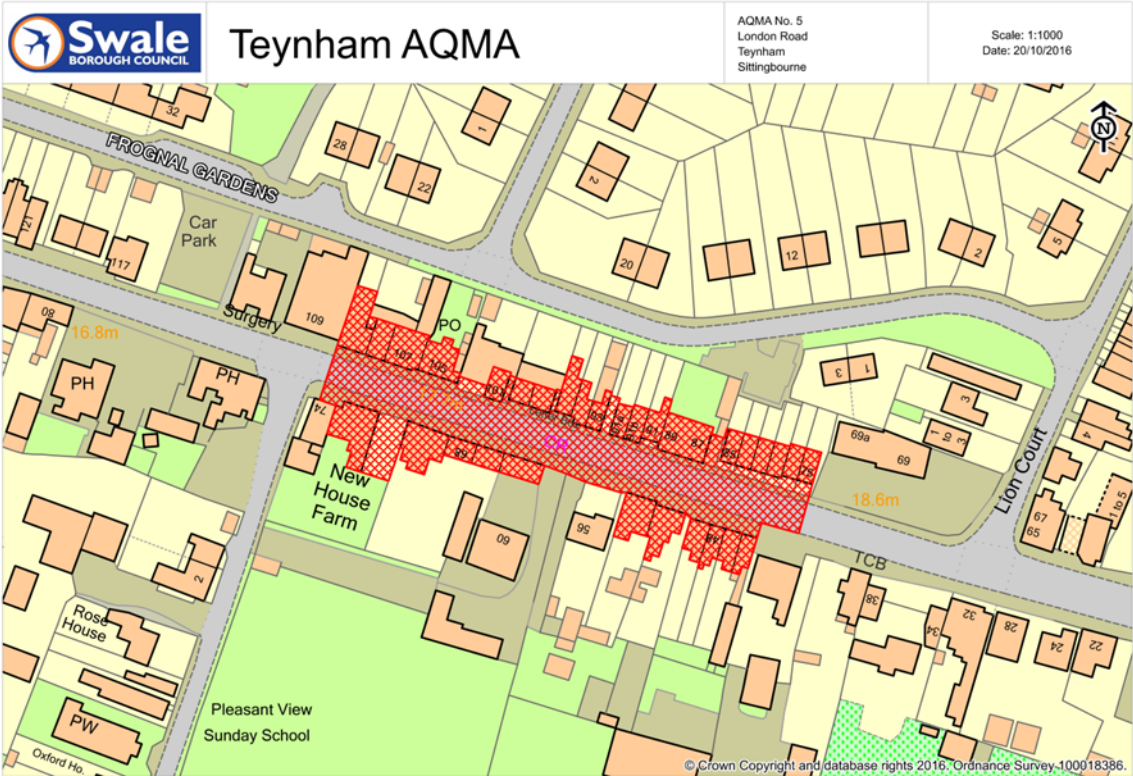


Figure C 5 AQMA 5: Teynham AQMA



Appendix VI Glossary of Terms

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

