

Dear Neighbours and Residents, {shared on 2nd April 2019}

For your information only.

Defra published this technical and policy document yesterday (1st April). It lays out the Government's objectives and strategies to meet legally-binding improvements to air quality on a **national/UK** scale.

Swale Borough Council (SBC) has the **National Planning Policy Framework (2018)** to help them understand the firm link between planning approvals and air-pollution toxins at the "roadside". SBC neglects its duties regarding "cumulative impact" where AQMAs are established. Their decisions in favour of adding more developments between Sittingbourne and Faversham are perverse. This new document helps place SBC's responsibilities into the context of wider national programmes and a realisation that the impacts of air-borne toxins are far more dangerous than previously thought.

Air Quality: National Air Pollution Control Programme (NAPCP) – March 2019

As this documents states on page 2: "***[The NAPCP] sets out measures and technical analysis which demonstrate how the legally binding 2020 and 2030 emission reduction commitments (ERCs) for 5 damaging pollutants (nitrogen oxides, ammonia, non-methane volatile organic compounds, particulate matter and sulphur dioxide) can be met across the UK.***"

- (1) The document makes clear the differences between "**ambient**" (background) and "**roadside**" pollution.

Obviously, strategies that improve the national picture on background pollution are important to us all.

However, "roadside" pollutants exceed what is healthy because of **local** traffic emissions and particulates, which are increasing with each additional vehicle. We are facing several thousand new vehicles, making many more thousands of journeys if Swale Borough Council continues with its conveyor belt of approvals that choke the A2. SBC is responsible for increasing the burden of toxic emissions and friction particulates that poison us daily.

- (2) The document:-

- Is set out in a series of tables across 66 pages. Essentially a list of measures, targets, and guiding frameworks and regulations - focussed broadly on urban problems.
- Describes the different approaches in Scotland, Wales, Northern Ireland, and England. For England, we are guided by the *January 2019* Defra document - **The Final Clean Air Strategy for England** can be found at <https://www.gov.uk/government/publications/clean-air-strategy-2019>
- **Lists main sources of toxic pollution:** industry, agriculture (e.g. ammonia), domestic combustion and transport. The "Road to Zero Strategy" (electric cars) can be found here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf. Maritime and aviation pollution measures are on a very slow track to 2050 – 'to protect our national competitiveness'.

- **Specifies “local authorities”** as responsible for implementation, enforcement, reporting and monitoring of the policies laid out at a national level.

The Government sets the scene with policies to reduce “ambient” toxins with a raft of technical and policy initiatives. **Local Authorities** are obliged to address local areas that experience acute episodes of toxicity – the AQMAs.

Against this background, with respect to the five AQMAs along the A2, SBC continues to ignore logic (cars + more cars = more congestion + more pollution). They make a mockery of their obligations under the National Planning Policy Framework (2018) to apply the concept of “cumulative pollution”.

Kind regards

Nigel Heriz-Smith