

Dear Residents and Neighbours,

OK, why the silence during a period when so much news-coverage is being devoted to the question of harm through pollution?

A lot has happened to worry us all!

Sometimes it is difficult to know where to start.

So, for sake of clarity, I shall follow up this email with a summary of recent policies and news.

For now, let me share my disappointment (but not surprise) with the **lack of evidence-based analysis and policy-making** found at the Swale Focus Group session in Swale House on 8th January. Several communities were represented.

I left the Focus Group with some worrying messages from officials – it appears that SBC are determined to conclude that Greenstreet (AQMA5) has ‘nothing more to worry about’ on the pollution front. They reach this view using the following prejudicial assumptions:-

- **SBC’s PM2.5 blind spot:** “Harm” is only measured by SBC in terms of PM10 (the larger but still harmful dust particles) and NOx (the **only** PM2.5 particles that SBC is legally required to measure). In spite of the mounting evidence endorsed by central government, SBC ignores the greatest risks to our health coming from all the *“other PM2.5 particles.”*
 - As I have often ‘banged on about’ - **all** the *“other PM2.5 particles”* are set to increase with the increased traffic that everyone is agreed will happen nationally. More vehicles = more friction products = more PM2.5 to poison our organs - heart, brain, lungs, skin, cancers, etc, etc.
 - SBC does not intend to invest any time, financial or physical resources in developing the **evidence base** for *“other PM2.5”*... ignoring the firm evidence of “harm” being brought to their attention by central government (2018) and World Health Organisation (WHO).
- **SBC’s use of the ‘poor man’s technology to measure NOx pollution:** Even in the matter of NOx measurement, the Council has adopted the prejudicial view that “harm” in Greenstreet/AQMA5 is a ‘minimal risk’ so they reject arguments for continuous monitoring. Continuous Monitoring is present in Sittingbourne (no surprise there!) and Ospringe. Investing in the most accurate measurement of harmful pollution is not a priority for AQMA5. Our community is not of limited interest to SBC.
- **“Prejudicial view”:** pollution is a worry to SBC in Ospringe (continuous monitoring is present) and Sittingbourne (continuous monitoring is present) but

not in Greenstreet that sits between these two ‘pinch-points’ and is a ‘pinch-point’ in its own right!

So ... how is it that SBC officials have convinced themselves there is ‘no problem’ for our communities? Read on ...

Rather than measure pollution under all conditions over a meaningful period of time, **SBC is ducking Continuous Monitoring:**

- *AQMA5 has diffusion tubes installed ...* but not where pollution is worst! There are apparently multiple diffusion tube sites between Station Road and Lynsted Lane and two at the corner of Frogal Lane. There is no measurement in the canyon between Frogal Lane and Lynsted Lane, which regularly faces crawling, stop-start traffic problems.
- *Fearing vandalism*, the diffusion tubes are high up and out of reach. That is to say, above all our mouths and noses and, very worryingly, way above the zone that contains 60% of all pollution ... 1 metre above pavement level ... where children’s mouths and noses inhale damaging particles to accumulate in their developing organs. Anyone in a wheelchair or mobility scooter will also inhale this denser cloud.
- *“Smoke and Mirrors 1”*: Asked how SBC has measured wider pollution in AQMA5, SBC has adopted the “Law of Averages” using Vehicle Number Plate Recognition.
 - SBC’s argument is that on three occasions, they installed a camera to record Number Plates and then used DVLA data to identify each vehicle and then looked up the “emissions profile” of each model (hopefully none were cars that have been shown to lie about their emissions!?). Adding these together they decided this ‘proved’ pollution was not serious.
 - *On the face of it*, this is quite clever but is actually a cop-out. It is *incapable* of taking into account:
 - how warm the engine is (pollution is worst with cold engines);
 - the whole story of each vehicle as it travels through AQMA5 – how many times it has to slow down and sped up to negotiate obstructions (lower gears lead to more pollution for each metre travelled);
 - the maintenance record of each vehicle; and
 - of course, nothing about the “*other PM2.5*”.
 - In short, it fails the test of “reality” and is prejudicial!
- *“Smoke and Mirrors 2”*: PM2.5 in AQMA5 is **assumed**, based on conditions measured in ... Maidstone! This approach is incapable of taking into account:
 - Maidstone has an entirely alien topography – AQMA5 sits in a ‘closed system’, a “tube” if you will. Our “tube” tracks East-to-West, with prevailing winds coming from the South and southwest. Our

conditions tend to trap and concentrate pollution at ground level, between the buildings that sit very close to the highway – the so-called “Canyon Effect”. Maidstone is a much more complex and ‘disturbed’ topography.

- Traffic in our “tube” has to cope with high levels of mixed traffic that passes throughout the day. At busy times, traffic struggles to negotiate the complexity of people crossing the road, cars parked to use the Services found in Greenstreet, junctions that lead to further constrictions, and the common-place HGV traffic that further restrict passing traffic.

These deficiencies in the “evidence base” can only be corrected by real-time and continuous monitoring. SBC’s approach simply argues that there is problematic pollution in Ospringe and Sittingbourne but it miraculously ‘disappears’ when the same traffic is experienced in AQMA5/Greenstreet!

- **Planning versus Environment officials:** SBC officials are determined to ignore planning policies when evaluating pollution and vice versa. Apparently, the two SBC offices (“Environmental” and “Planning”) have decided that the “Pollution Document” that is being drafted should not include references to the National Planning Policy Framework (2018). NFFP places an obligation on SBC to measure the “cumulative impact” on an AQMA arising from nearby multiple developments. SBC officials simply do not want the two policy areas to bind each other, in spite of the clear Government advice that the two **are** related.
- *And finally*, during the Focus Group discussions, the **absence of a meaningful coherent public transport policy** in Swale was mentioned by our table. Each bus removes 12 metres of cars from the road. This is a complex policy area but many urban centres have mastered it. In summing up the evening’s exercises, SBC failed to take that message onto the final Boards.

Conclusion: SBC makes up its own story based on “inference” rather than “evidence” – comparing chalk with cheese. They force-fit whatever data is available to them to fit their conclusions/prejudices! The **ONLY** sensible and responsible approach in defence of our health is to use **Continuous Monitoring** over a period of months and years rather than **THREE** short periods using cameras and assuming Maidstone is the same as AQMA5.

I consider this approach negligent. SBC continue wilfully to put our health and lives at risk. SBC fails to adopt a robust evidence-based policy approach. The upshot will be a “Strategy” not worth the paper it is printed on.

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