

London Borough of Lewisham Air quality action plan



Lewisham

2016–2021



London Borough of Lewisham

Air Quality Action Plan (2016–2021)

Summary

This Air Quality Action Plan (AQAP) has been produced as part of our duty to London Local Air Quality Management. It outlines the action we will take to improve air quality in the London Borough of Lewisham between 2016–2021.

This action plan, approved by Lewisham’s Mayor and Cabinet, replaces the previous action plan which was issued in 2008 with yearly updated progress on actions reported to DEFRA. Highlights of successful projects delivered through the past action plan include:

- Plans for the expansion of the electric vehicle charging points throughout the borough,
- 20 mph speed limit being introduced on all of Lewisham’s highways,
- The North Lewisham links project which is improving walking and cycling routes across Deptford and New Cross, which also includes the Quietways project (cycle routes through quieter side streets and parks, aimed at encouraging less-confident cyclists)
- Planning Policy that is providing car-free developments
- Reducing our own emissions in our fleet vehicle selection.
- Lewisham has also been raising awareness on this important issue through school programmes and a public art project.

Air pollution is associated with a number of adverse health impacts, it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2}.

The annual health costs to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion³. The London Borough of Lewisham is committed to reducing the exposure of people in Lewisham to poor air quality in order to improve health.

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

³ Defra. Air Pollution: Action in a Changing Climate, March 2010

We have developed actions that can be considered under six broad topics:

- Emissions from developments and buildings: emissions from buildings account for about 15% of the NO_x emissions across London so are important in affecting NO₂ concentrations;
- Public health and awareness raising: increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
- Delivery servicing and freight: vehicles delivering goods and services are usually light and heavy duty diesel-fuelled vehicles with high primary NO₂ emissions;
- Borough fleet actions: our fleet includes light and heavy duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example;
- Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures; and
- Cleaner transport: road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric) as far as possible.

Our priorities are:

- to control emissions from new developments, through Planning and enforcement, including construction (sites and traffic). Lewisham will, through a Mayor's Air Quality Funded (MAQF) project, produce and implement a Zonal Construction Logistics Plan for the developments taking place in the area around the Evelyn Street corridor. This is a GLA focus area (further details on this MAQF can be found in 2.1) and an Opportunity Area within the London Plan.
- to work with partners, i.e. Blue Point and TfL to increase the number of electric vehicle charging points accessible to residents and businesses within the borough, see 2.2.
- to work with Public Health in awareness raising, through school projects and establishing links with local businesses, see 2.3.
- to work with the GLA and other local boroughs in new air quality initiatives/opportunities, where appropriate, see 2.4.

You will see in this report that we have worked hard to engage with stakeholders and communities which can make a difference to air quality in the borough. We would like to thank all those who have worked with us in the past and we look forward to working with you again as well with new partners as we deliver this new action plan over the coming years.

In this AQAP we outline how we plan to effectively use local levers to tackle air quality issues within our control.

However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and so we will continue to work with and lobby regional and central government on policies and issues beyond Lewisham's influence.

Responsibilities and commitment

This AQAP was prepared by the Environmental Protection Team of Lewisham Council with the support and agreement of the following teams and departments: Development Control, Planning Policy, Project Management, GreenScene, Public Health, Procurement and Legal, Energy and Efficiency, Travel Demand Management, Fleet Services, Transport Planning (including Sustainable Transport).

The AQAP will be subject to an annual review, appraisal of progress. Progress each year will be reported in the Annual Status Reports produced by the London Borough of Lewisham, as part of our statutory London Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Christopher Howard at:

E-mail: Christopher.howard@lewisham.gov.uk and
Environmentalprotection@lewisham.gov.uk

Tel: 020 8314 6418

Address: London Borough of Lewisham,
Environmental Health,
9 Holbeach Road,
Catford, SE6 4TW

Contents

Abbreviations	6
Foreword – Cllr Onikosi, Cabinet Member Public Realm	7
Foreword – Dr Danny Ruta, Director of Public Health, Lewisham Council	8
Introduction	9
1 Summary of current air quality in London Borough of Lewisham	9
1.1 AQMAs and Focus areas	13
2 London of Borough of Lewisham’s Air Quality Priorities	18
2.1 Minimising emissions from New Developments	18
2.2 Expanding the Council’s Sustainable Transport Infrastructure	19
2.3 Raising Public Health and Awareness	19
2.4 Collaboration with the GLA and other London Boroughs on Air Quality Initiatives	20
3 Development and Implementation of London Borough of Lewisham AQAP	21
3.1 Consultation and Stakeholder Engagement	21
3.2 Steering Group	21
4 AQAP Progress	22
Tables	
Table 3.1 Consultation Undertaken	21
Table 4.1 Air Quality Action Plan	23
Appendix A	37

Abbreviations

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non-Road Mobile Machinery
PM ₁₀	Particulate matter less than 10 micron in diameter
PM _{2.5}	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London

Foreword



Through this Air Quality Action Plan, Lewisham Council is working to bring improvements to air quality within its borough. Air Quality is a London wide issue primarily affected by road transport.

There are actions that the Council can make which are detailed in this Plan, but since air quality is a London wide problem it requires a regional response with appropriate and effective action in order to bring a sustainable resolution. It is therefore with great anticipation that we await the outcome of the London Mayor's consultation proposals for tackling air quality in London which includes extending the Ultra-Low Emission zone (ULEZ) to include parts of the London borough of Lewisham. If implemented, the ULEZ will control the vehicles entering Lewisham, where higher air quality standards for vehicles will be required. Lewisham welcomes this as an approach to reduce air pollution in areas the Council has already identified as Air Quality Management Areas. As much of the pollution comes from Transport for London (TfL) managed roads this is an important step for the Greater London Authority (GLA) to pursue. There will undoubtedly be future media communication from the GLA on the timescale for introducing the ULEZ, the extent and the implications on those of us that live, work, learn and visit the London Borough of Lewisham.

This document sets out the Council's action plan in order to improve air quality within the Borough; it considers all the areas under Lewisham's control. We are seeking to minimise emission from new developments, through effective planning. We have been successful in winning a London Mayor's Air Quality Fund bid for 2016-2019 to fund a project that will manage the construction traffic in an area where there is large scale planned development. We are expanding the Council's sustainable transport infrastructure, improving links for walking and cycling and increasing the number of electric vehicle charging points within the borough. We are raising public health and awareness, working with Public Health, Lewisham is providing a joined up approach, recognising that air quality within the borough is an important health determinant. It is also important that Lewisham continues to collaborate with the GLA and other London boroughs on air quality initiatives in order to maximise the work and funding available ensuring best practice and innovation.

Finally this Air Quality Action Plan, which runs for a five year period 2016-2021, is a working document and within the time period there will be further actions added. These actions and progress made are reported on a yearly basis to the GLA. We have used their template and documentation in producing this document and acknowledge with thanks their valuable contribution to this plan.



Clr Onikosi, Cabinet Member Public Realm

Foreword



Tackling air quality will have a substantial impact on the health and wellbeing of Lewisham residents. This Air Quality Action Plan will take a major step forward in addressing this important public health issue. The effects of air pollution are felt most strongly by the most vulnerable, including the young, the elderly and those with heart and lung diseases.

By working together, we can create a healthier environment in Lewisham which will deliver many health gains: longer health expectancy, reduced obesity, reduced sickness absence, greater social connectedness and improved wellbeing.

I welcome the actions being taken by the Council to address and improve the air quality both within the borough and in London as a whole.

A handwritten signature in black ink, appearing to be 'DR' followed by a long horizontal stroke.

Dr Danny Ruta MBBS MSc MFPH
Director of Public Health, Lewisham Council

Introduction

This report outlines the actions that London Borough of Lewisham will deliver between 2016-2020 in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough.

It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the London Local Air Quality Management statutory process⁴.

1. Summary of current air quality in London Borough of Lewisham

The UK Air Quality Strategy (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.

London Borough of Lewisham is meeting all of the national AQS objectives other than for the gas Nitrogen Dioxide (NO₂). Lewisham is meeting the current objectives for Particulate Matter (PM₁₀ and PM_{2.5}) but as this pollutant is damaging to health at any level, this remains a pollutant of concern.

The following Figures, 1 to 3 present the modelled air quality in the borough. The figures are based on the London Atmospheric Emissions Inventory (LAEI) 2013 data which is the latest version. The Nitrogen Dioxide and Particulate, PM₁₀ Limit, of 40 µg/m³ annual mean is shown on Figure 1 and Figure 2 respectively and colours below the limit line show levels of exceedance. There are currently no statutory limit values for PM_{2.5} however an annual mean objective of 25 µg/m³ by 2020 has been proposed by the government.

⁴ LLAQM Policy and Technical Guidance.

www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs

London Borough of Lewisham
Annual Mean NO₂ concentrations 2013

LAEI 2013

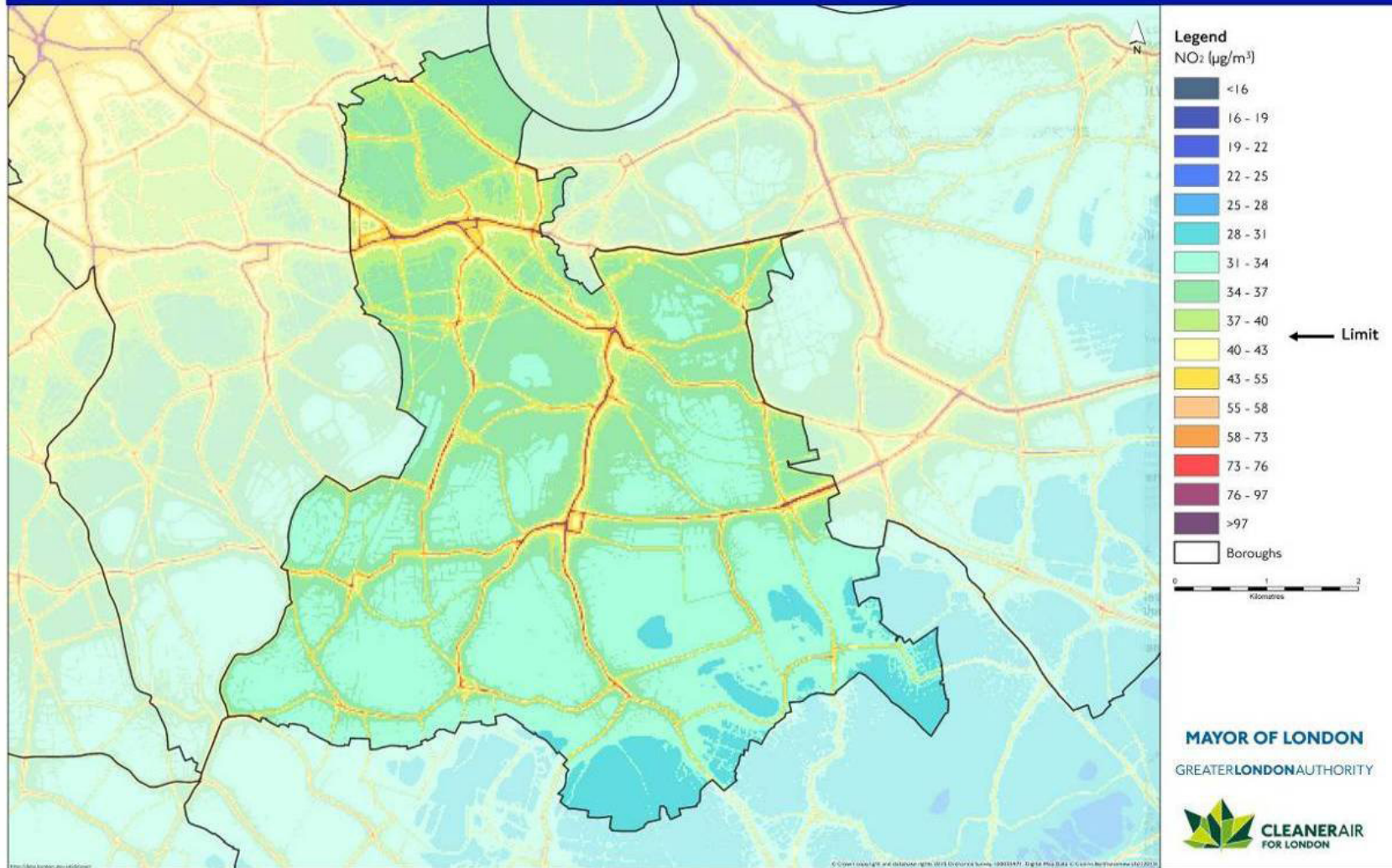


Figure 1 Modelled map of annual mean NO₂ concentrations (from the LAEI 2013)

London Borough of Lewisham
Annual Mean PM₁₀ concentrations 2013

LAEI 2013

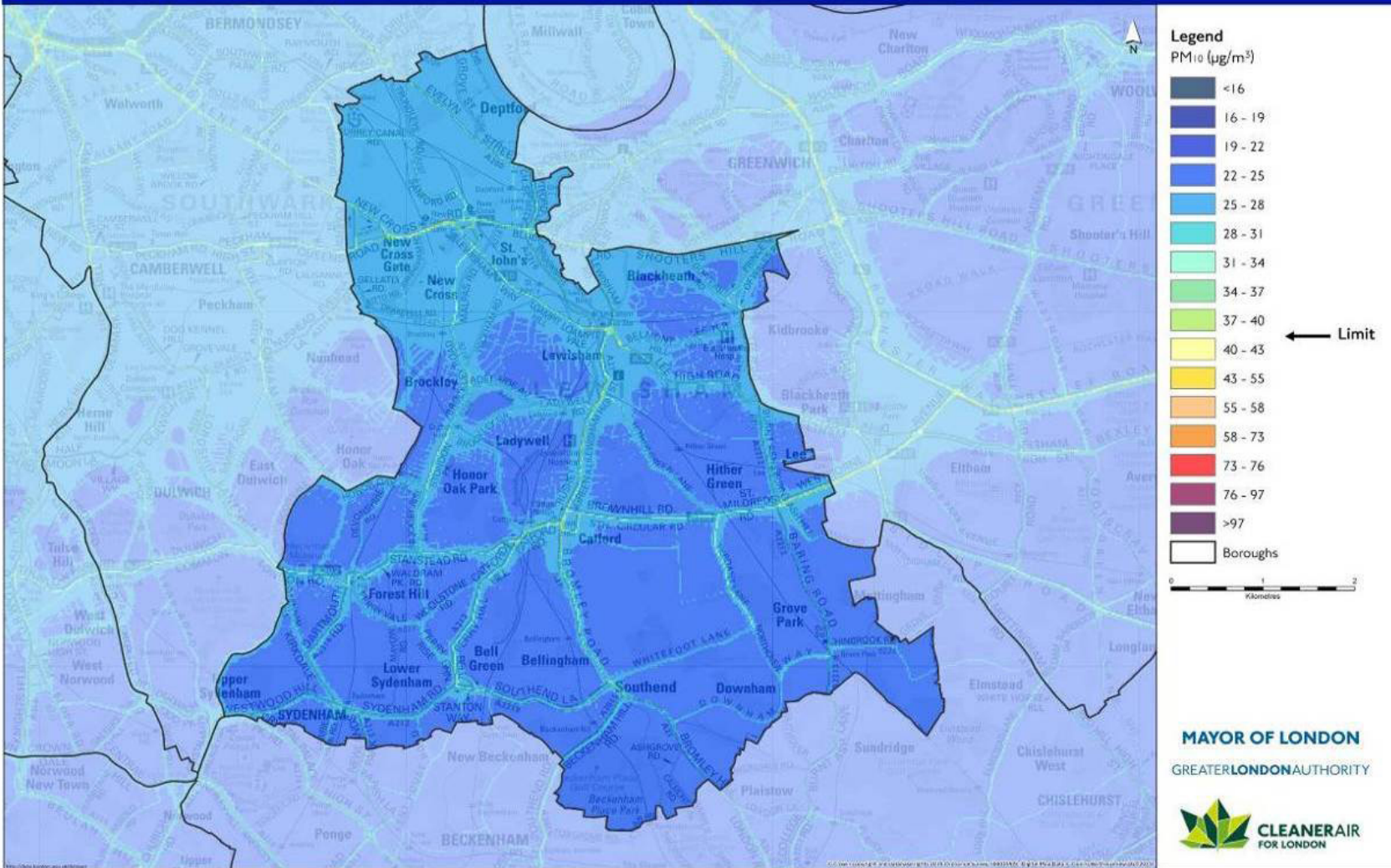


Figure 2 Modelled map of annual mean PM₁₀ (from the LAEI 2013)

London Borough of Lewisham
Annual Mean PM_{2.5} concentrations 2013

LAEI 2013

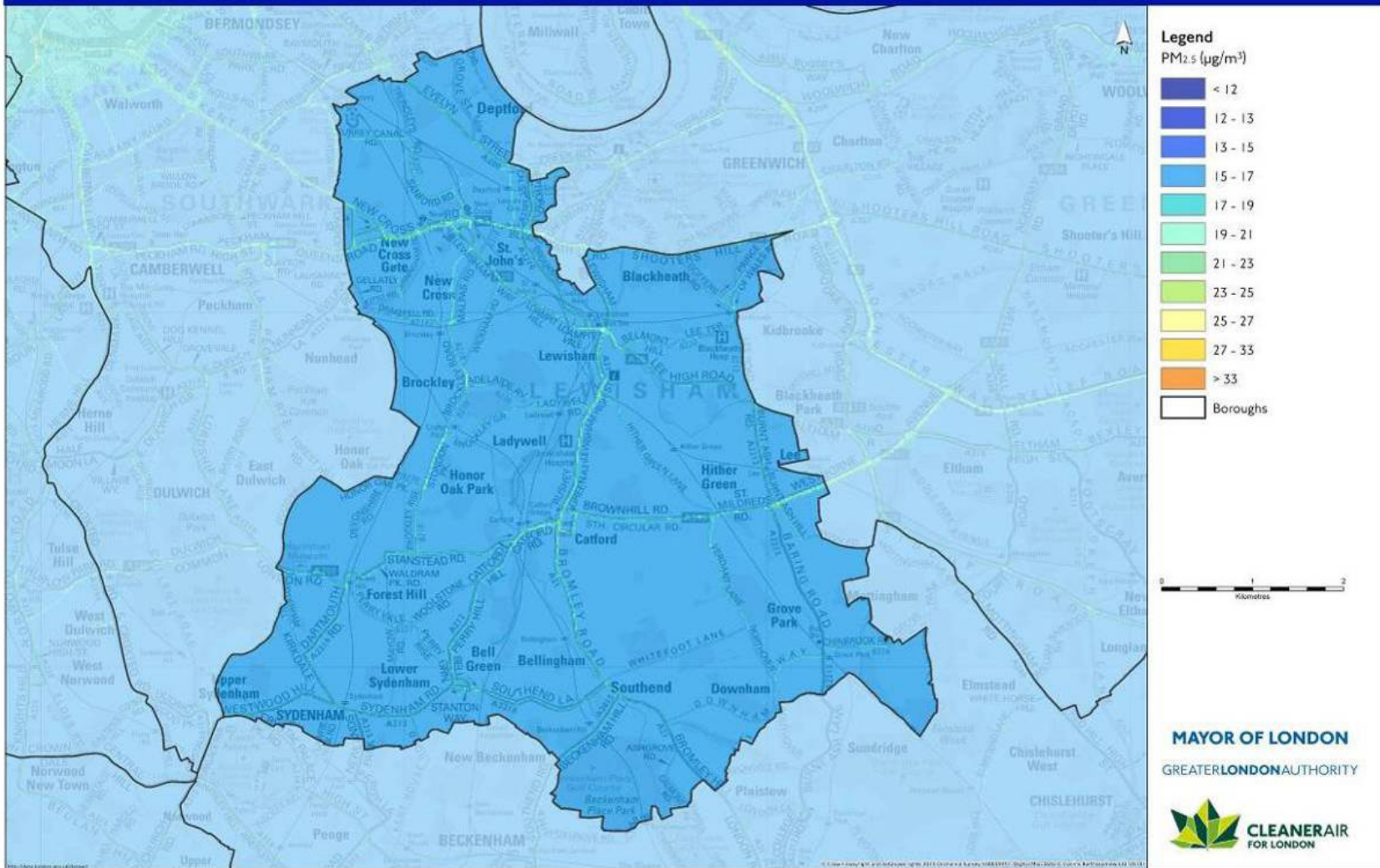


Figure 3 Modelled map of annual mean PM_{2.5} (from the LAEI 2013)

1.1 AQMAs and Focus areas

Air Quality Management Area (AQMA)s have been declared in the areas presented in Figures 4 below:

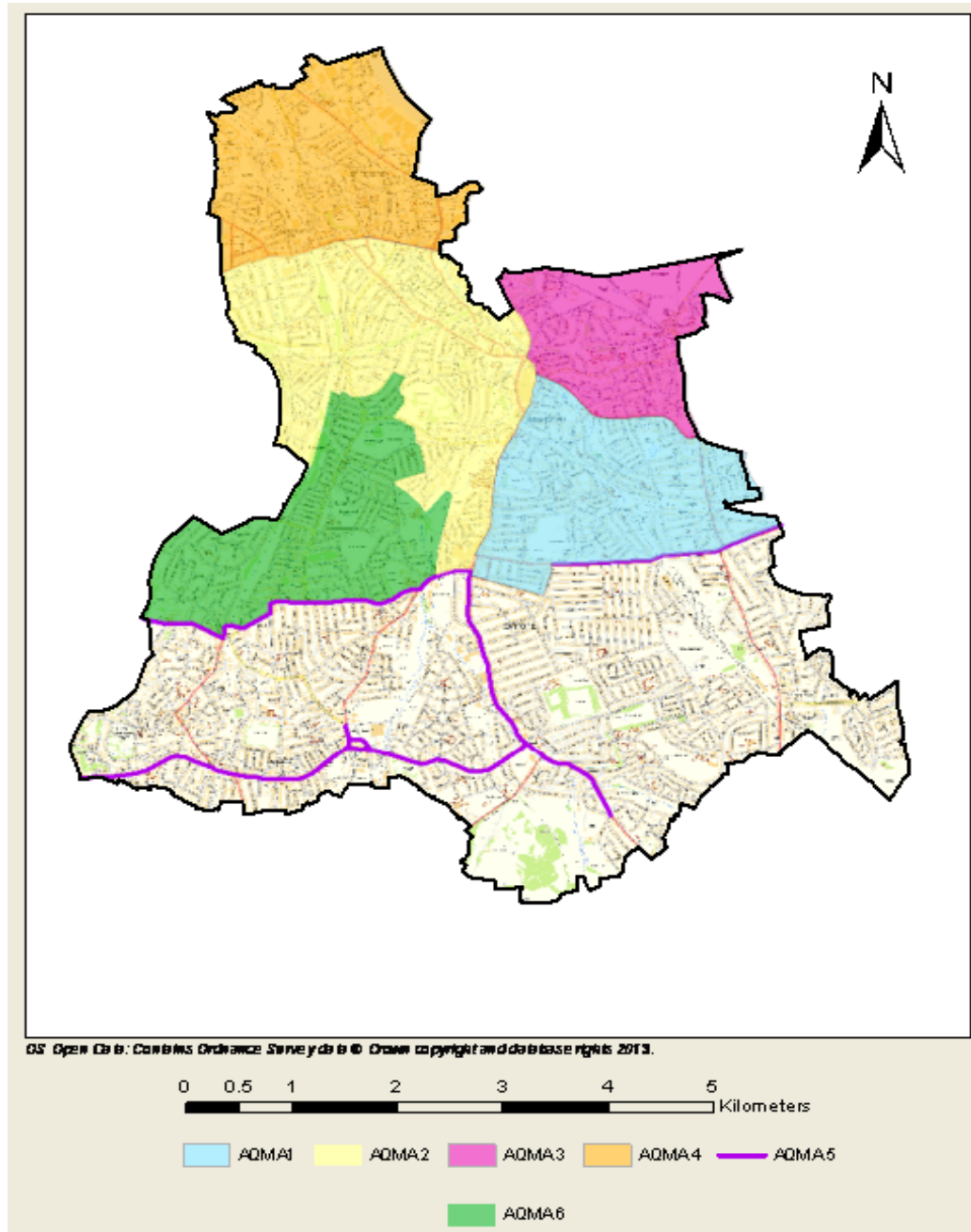


Figure 4: Air Quality Action Plan Areas

The AQMA has been declared for the following pollutant/s:

Nitrogen Dioxide because we are failing to meet the EU annual average limit of $40 \mu\text{g}/\text{m}^3$ for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations, and

Particulate Matter (PM₁₀) because although we are meeting EU Limits of 40 µg/m³ annual average, we are exceeding World Health Organisation air quality guideline of 20 µg/m³ annual average for this pollutant), and we have a formal responsibility to work towards reductions of PM_{2.5}, which is a fraction of PM₁₀. An air quality Focus Area is a location that has been identified as having high levels of pollution and human exposure. There are 8 focus areas in the borough as shown on Figure 5 below:

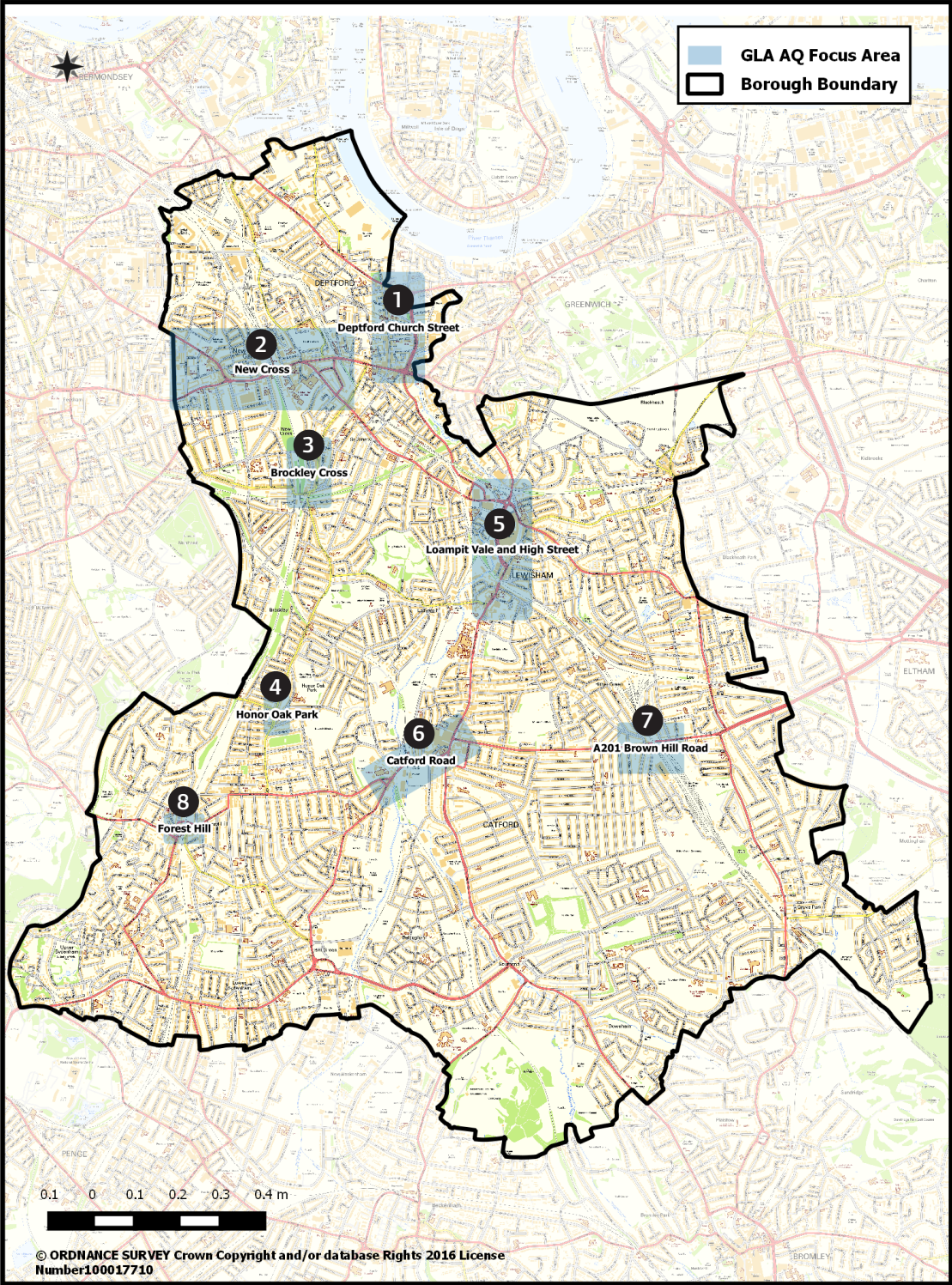


Figure 5: GLA Air Quality Focus Areas in Lewisham

As part of the Air Quality Action Plan, the Focus areas will be considered when reviewing specific actions. Currently 4 of the GLA AQ focus areas (1, 2, 3 and 4), have direct actions which are currently happening or are planned. Lewisham will report through the ASRs on further actions being incorporated within these designated areas, as and when available. There will be a review of all these areas by April 2017 with the potential of actions. This will need to take into account available funding and the Council will seek S106 funds for future actions in these areas.

1.2 Sources of Pollution in Lewisham

Pollution in Lewisham comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

Of the pollution that originates in the borough the main sources of NO₂ are diesel vehicles and boilers, and the main sources of particulate matter are diesel vehicles and localised construction sites, including re-suspension. In relation to exposure, Figure 1 provides a more accurate picture, as this represents the ground level concentrations, with the road transport network identified as the main source.

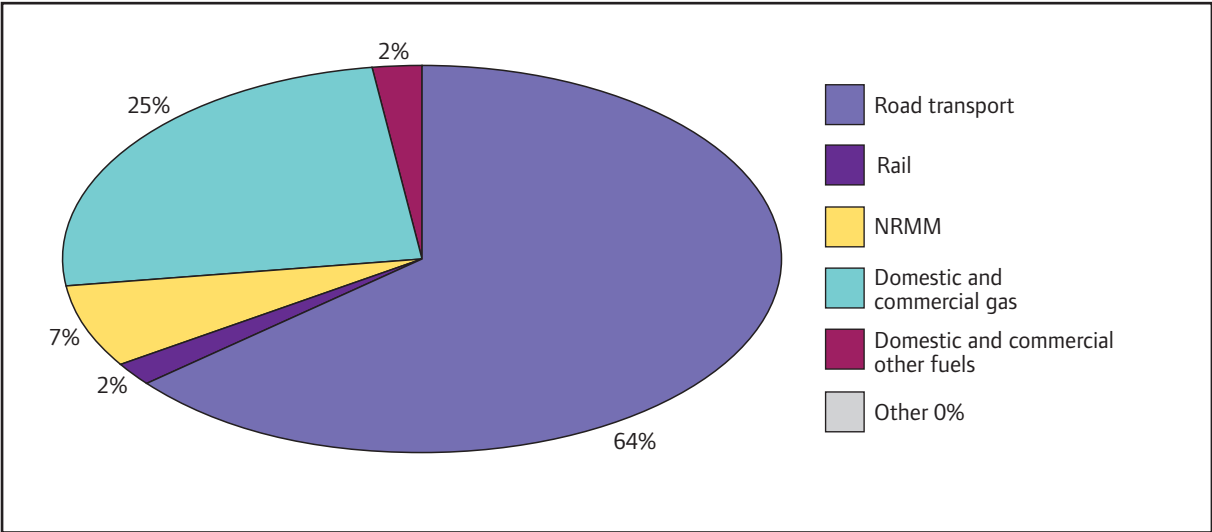


Figure 6a NO_x Emissions by source (from the LAEI 2013)
This excludes industrial sources, as the Nitrogen Oxide emissions are dispersed at high level and will not have any significant contribution to residents exposure.

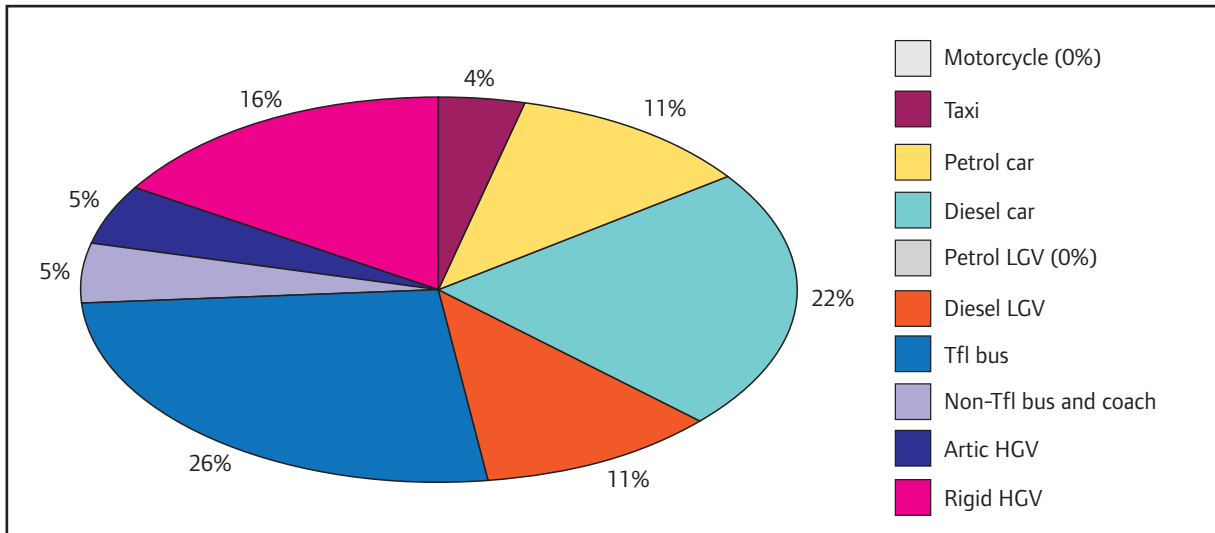


Figure 6b NOx Emissions by vehicle type (from the LAEI 2013)

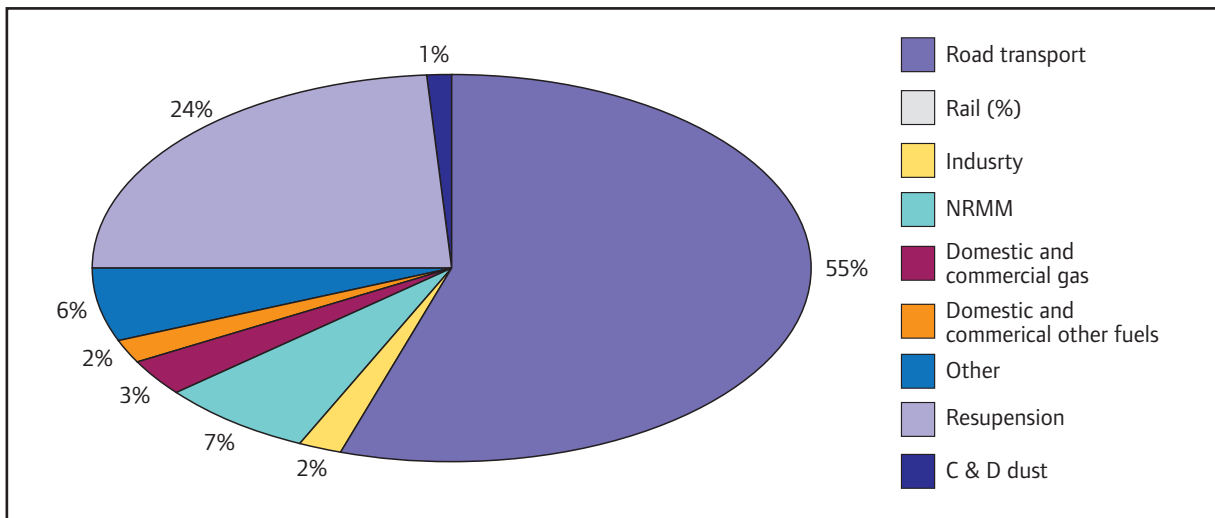


Figure 7a PM₁₀ Emissions by source (from the LAEI 2013)

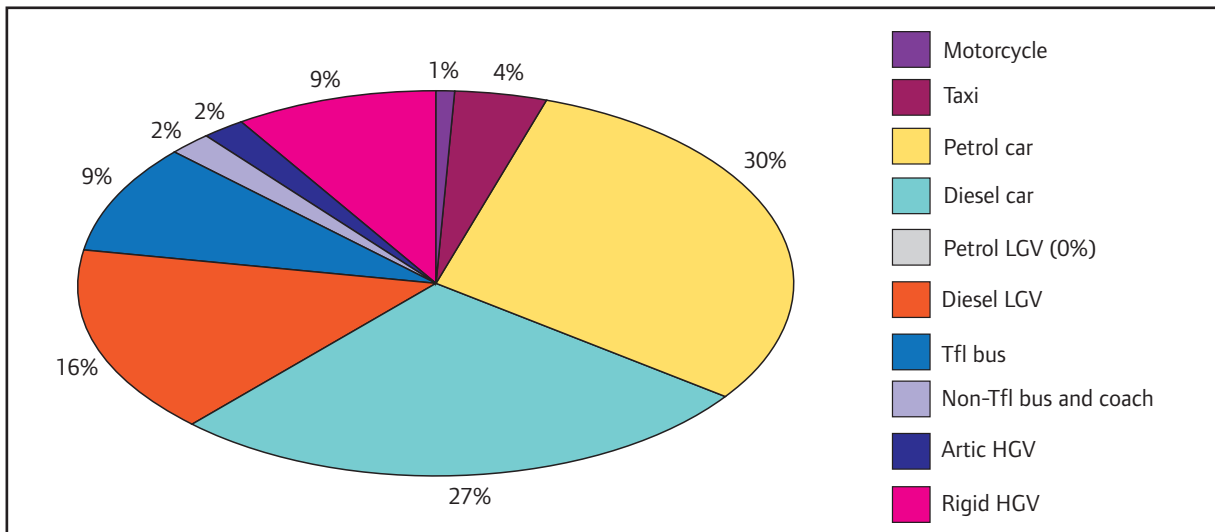


Figure 7b PM₁₀ Emissions by vehicle type with total emissions from brake, tyres and exhaust (from the LAEI 2013)

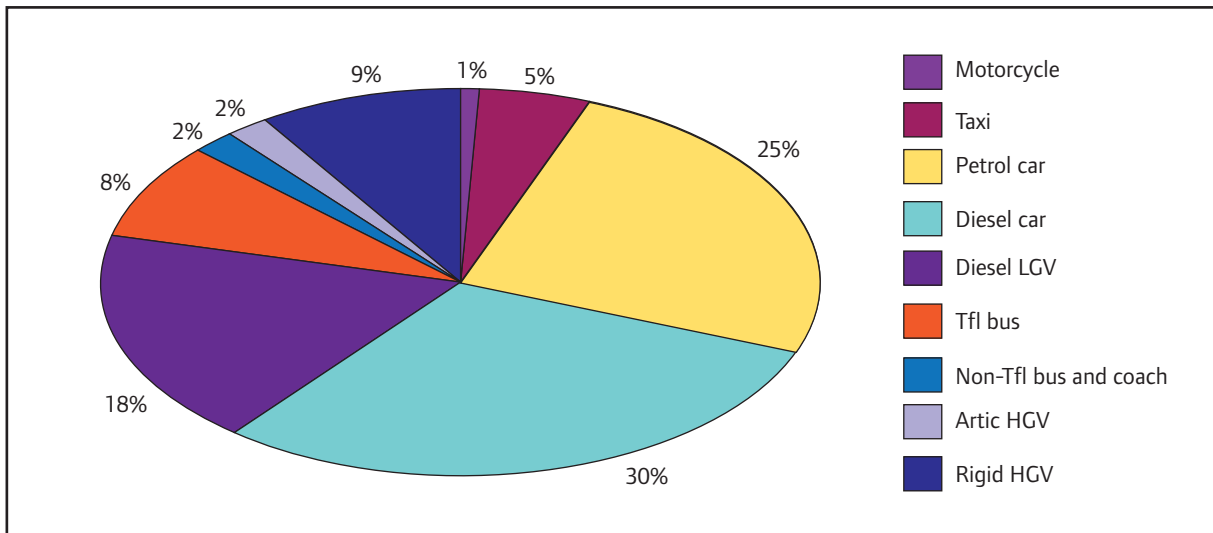


Figure 8a PM_{2.5} Emissions by source from the LAEI 2013)

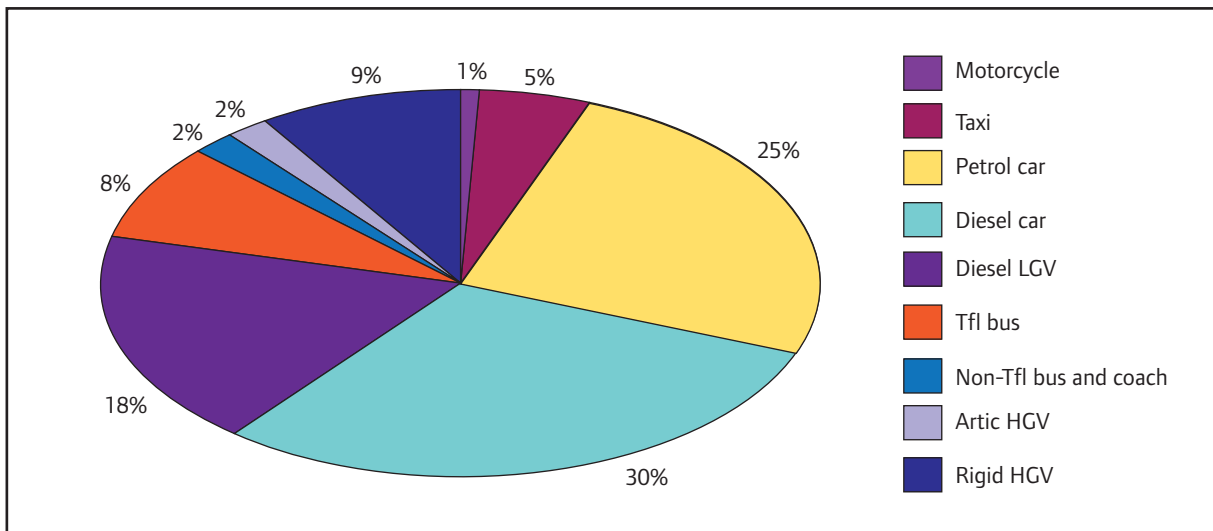


Figure 8b PM_{2.5} Emissions by vehicle type with total emissions from brake, tyres and exhaust (from the LAEI 2013)

2. London of Borough of Lewisham's Air Quality Priorities

2.1 Minimising emissions from New Developments

The borough is currently undergoing significant regeneration with residential, commercial, utilities and transport network improvements, particularly in the Thames Gateway area. Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area stretching east to the Kent and Essex coasts along the Thames Estuary.

In Lewisham's Core Strategy⁵ one of the visions of the borough is that by 2026:

'The north of the borough will have been transformed by the regeneration of large strategic sites that will provide new places for people to enjoy, and new facilities to support existing and new communities.' 4.14 Lewisham Council's Core Strategy

A major area of development for the next 5 year period of this AQAP will be the Evelyn St Corridor (which corresponds to the Deptford Church Street/Broadway/Evelyn Street and part of the New Cross GLA air quality focus area).

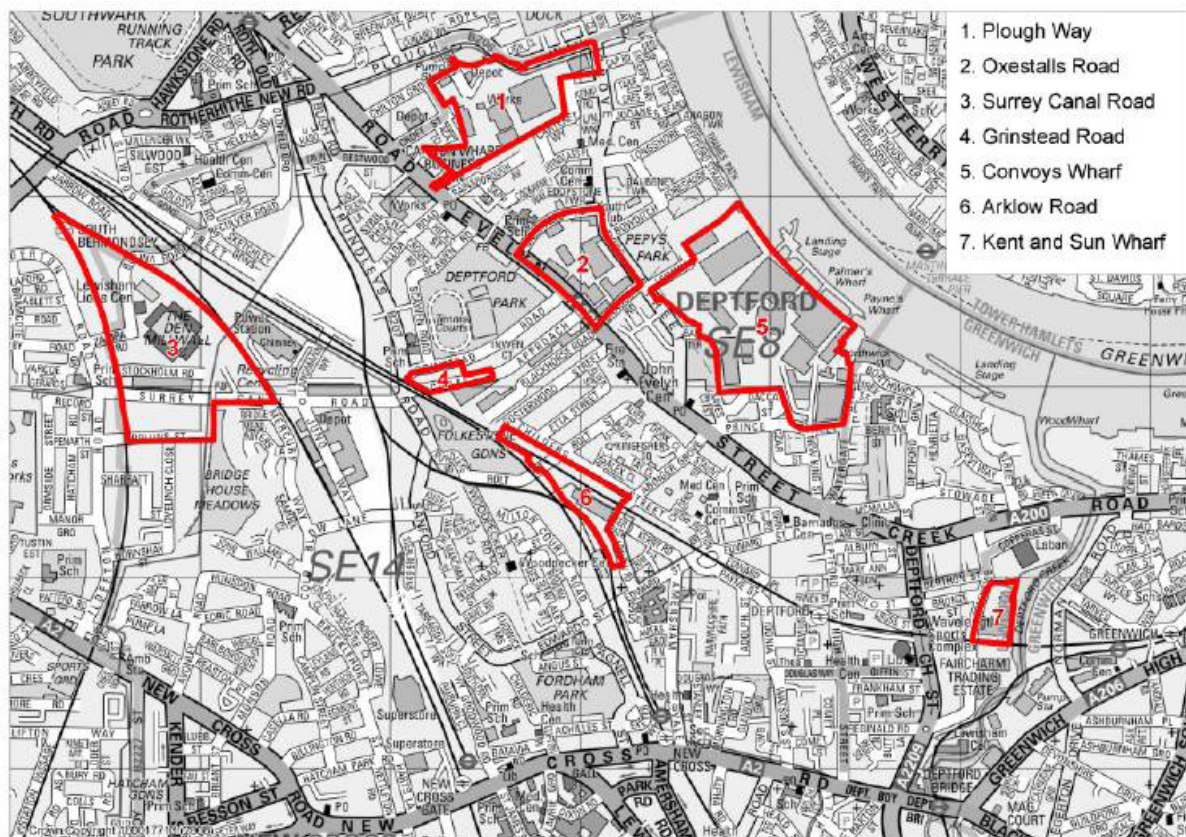


Figure 9 Anticipated redevelopment major locations in Evelyn St Corridor (Lewisham local development framework)

⁵ Lewisham Council's Core Strategy, www.lewisham.gov.uk/myservices/planning/policy/Documents/CoreStrategyAdoptedVersion.pdf

Of the five strategic sites identified in the Council's core strategy, four are in the Evelyn Street Corridor area (providing 8,500 homes), along with Thames Tideway works and the potential Cycle Superhighway. It is also identified as an Opportunity Area within the London Plan.

A priority for this AQAP is therefore to provide development, through construction and build, which minimises emissions through effective planning policy, development control and environmental protection enforcement. As part of this priority Lewisham, through London's Mayor Air Quality Funding (MAQF), is seeking to establish, monitor and enforce a Zonal Framework Construction Logistics Plan for the Evelyn and New Cross area. This will seek to reduce the impact and emissions from vehicle movements to and from construction sites in the area.

2.2 Expanding the Council's Sustainable Transport Infrastructure

Lewisham is prioritising the reduction of emissions from road traffic and to that end supports the necessary infrastructure required to support the uptake of ultra low emission vehicles, and also to facilitate cycling, walking and the use of public transport. The Council is working with partners to increase the number of electric vehicle charging points accessible to residents and businesses within the borough. Lewisham currently has 10 EVCP locations (with 2 to 3 charging points per location) within the borough, accessible to all residents who are registered with Source London www.sourcelondon.net. This will be expanding by a further 14 locations, planned to be available from March 2017. Usage is continually reviewed and identification of new locations will consider residents requests through Source London (www.sourcelondon.net/).

The North Lewisham Links Project is a programme of works aiming to improve walking and cycling routes across Deptford and New Cross (see Figure 10) in order to encourage residents to live more active lives and make better use of local amenities and public transport. It is also in the same area where the Council is seeking to deliver the, MAQF funded, Framework CLP. Additionally, changes are being planned to a 3km stretch in the north of the borough to make it more attractive to new or less-experienced cyclists, as part of the Quietway project which will connect Surrey Canal Road in the far north-west of the borough to Creekside in the far north-east.

2.3 Raising Public Health and Awareness

Lewisham has already produced a Joint Strategic Needs Assessment (JSNA) for Air Quality, which as part of this Action Plan will be periodically reviewed. The Public Health and Environmental Protection Teams will work together in raising awareness on air quality issues. As part of the last MAQF a public art project to raise awareness on air quality, in the Brockley and Crofton Park area has been developed and will be implemented by the end of 2016, www.tompearman.co.uk/brockley-corridor-arts. Also in the same area, a series of school lessons were taken over 2015, raising awareness of air quality at 5 local primary schools.

We will continue to engage with schools and the local community and over the period of this Action Plan will also develop links with businesses.

2.4 Collaboration with the GLA and other London Boroughs on Air Quality Initiatives

Lewisham is part of the London Low Emission Construction Partnership, which is an MAQF project, which aims to reduce emissions from the construction industry. It is also part of the South London Cluster Group, where Local Authority Officers meet and considers cross borough working on air quality projects. We will seek to maintain and strengthen links with others, including the GLA, where it is of benefit to bringing improvement to the residents of Lewisham.

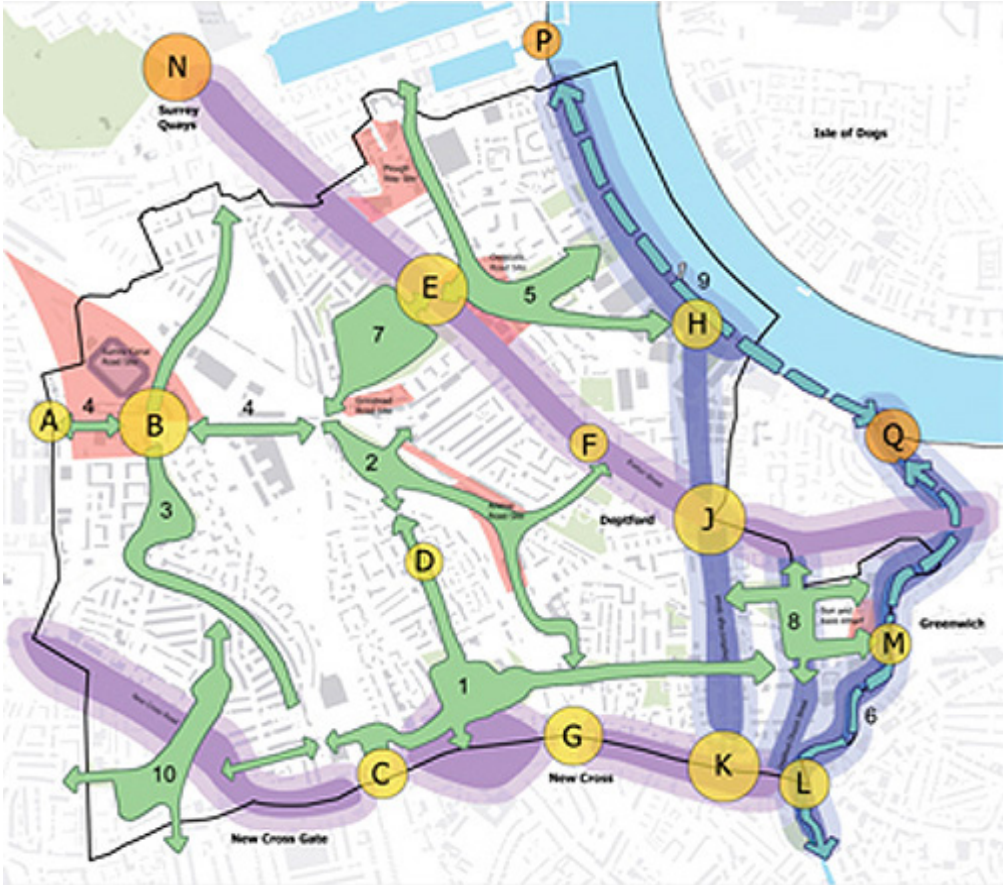


Figure 10: North Lewisham Links Project

Key

- 1. Kender To The Creek
- 2. Central Deptford
- 3. The Western Connection
- 4. Surrey Canal Road
- 5. Towards the river
- 6. Deptford Creek
- 7. Deptford Park
- 8. High Street to Creek
- 9. Riverside
- 10. New Cross Gate improvements

3. Development and Implementation of London Borough of Lewisham AQAP

3.1 Consultation and Stakeholder Engagement

In developing/updating the action plan we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.1. In addition we have undertaken the following stakeholder engagement:

- On line questionnaire to local residents and businesses to seek opinions on actions.
- Stall at Lewisham’s People’s Day event, used to obtain views from residents.
- Updated Lewisham’s website to raise Air Quality issues and engagement.
- Healthy Lungs tent, at the 2016 OnBlackheath festival, raising issues and highlighting Council’s action.

The response to our consultation stakeholder engagement is given in Appendix A.

Table 3.1 Consultation
The following organisations were consulted

Consultee
the Secretary of State
the Environment Agency
Transport for London and the Mayor of London (who will provide a joint response)
all neighbouring local authorities

3.2 Steering Group

The following teams were engaged through a Steering Group and specialist Working Groups: Development Control, Planning Policy, Project Management, GreenScene, Public Health, Procurement and Legal, Energy and Efficiency, Travel Demand Management, Fleet Services, Transport Planning (including Sustainable Transport).

The purpose of the meeting was to consider all the actions proposed by the GLA and to review the potential for incorporating these within Lewisham’s AQAP. The meetings were also used to highlight existing and potential future projects that are being carried out (or considered) by other teams which could have air quality benefits and scope for inclusion in this AQAP.

It was a good opportunity to build relationships between teams, and for responsibility for different actions to be owned by relevant teams. This will assist with the yearly reporting of actions and it is anticipated that the Steering Group will meet on a 6 monthly basis to provide input and feedback and ensure communication channels are maintained.

The challenge was in providing realistic monitoring criteria that can be managed resource wise and we will be working with GLA in refining this aspect during the Action Plan period.

4. AQAP Progress

Table 4.1 shows the London Borough of Lewisham's AQAP. It contains:

- a list of the actions that form part of the plan;
- the responsible individual and departments/organisations who will deliver this action;
- estimated cost to the council;
- expected benefit in terms of emissions and concentration reduction;
- the timescale for implementation; and
- how progress will be monitored.

Table 4.1 Air Quality Action Plan

The actions have been grouped into six categories: Emissions from developments and buildings; Public health and awareness raising; Delivery servicing and freight; Borough fleet actions; Localised solutions; and Cleaner transport.

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Emissions from developments and buildings	1	Ensuring emissions from construction are minimised	Planning and Environmental Protection and Transport Team	Ongoing resource required from Transport and Environmental Protection to review and make recommendations regarding the discharge of conditions. Planning Officer time taken to discharge conditions.	n/a (Benefits potentially significant but unquantifiable)	Already in operation. Impact of reduction will be ongoing.	Number of applications for the discharge of the Construction Logistics Plan and the Construction Environmental Management Plan approved	Local Policy and Local List requirement.
Emissions from developments and buildings	2	Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies	Planning and Environmental Protection Team	Ongoing resource required from Environmental Protection to review. Planning Officer time taken to condition	n/a (Benefits potentially significant but unquantifiable)	Condition already introduced. Impact of reduction will be ongoing.	Number of NRMM conditions recorded, and all sites checked on the NRMM database once construction begins	Only used for Major sites.
Emissions from developments and buildings	3	Enforcing alternative clean and efficient energy supplies (to replace Enforcing CHP and biomass air quality policies)	Planning	Ongoing resource required from Sustainable Energy and Planning Team.	n/a (Benefits potentially significant but unquantifiable)	In operation however continuing to consider best practice and alternative heat and power supplies	Abatement conditions review via planning. Report back to GLA through ASRs	Only used in limited circumstances, where the tests for conditions are met.

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Emissions from developments and buildings	4	Enforcing Air Quality Neutral policies	Planning	Ongoing resource required from Environmental Protection and Planning Team.	n/a (Benefits potentially significant but unquantifiable)	Already in operation. Impact of reduction will be ongoing.	Report back to GLA through ASRs	Considered on a site by site basis as new development is proposed. (Core Strategy Policy 12)
Emissions from developments and buildings	5	Ensuring adequate, appropriate, and well located green space and infrastructure is included in new developments	Planning	Ongoing resource required from Parks to review and make recommendations regarding the discharge of conditions. Planning Officer time taken to discharge conditions.	n/a (Benefits potentially significant but unquantifiable)	Considered as part of the design of schemes that come forward. New green space and infrastructure will be as a result of good design and place making.	Through conditions the implementation and long term management and maintenance of landscaping and green roofs within development	Urban greening strategies. Considered on a site by site basis as new development is proposed. (Core Strategy Policy 12)
Emissions from developments and buildings	6	Ensuring that Smoke Control Zones are appropriately identified and fully promoted and enforced	Environmental Protection Team	Ongoing resource from EP Team	2	Whole of borough is already a Smoke Control Area. (Smoke Control Order 2010)	Respond and report on complaints and action taken.	There was specific publicity promotion at the time of the order in 2010, will review in April 2017 further publicity.

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Emissions from developments and buildings	7	Promoting and delivering energy efficiency retrofitting projects in workplaces and homes, including through using the GLA RE:NEW and RE:FIT programmes, where appropriate, to replace old boilers / top-up loft insulation in combination with other energy conservation measures.	Sustainable Resources	Ongoing resource from Sustainable Resources Team	1	Ongoing. Review date of April 2017 for potential project.	The biannual Home Energy Conservation Act report is due in 2017 which will provide progress on measures and report back to GLA in ASRs.	Lewisham Council Corporate Sustainability Use of Resources Statement is provided on a periodic basis and could be used to provide input to monitoring.
Emissions from developments and buildings	7A	Introduce a requirement for a minimum EPC rating for privately rented sector HMOs covered by both the mandatory and additional licensing schemes	Private Sector Housing (Environmental Health Residential)	Ongoing resource from Private Sector Housing (Environmental Health Residential)	2	April 2017, with monitoring of action considered after this date.	tbc	
Emissions from developments and buildings	7B	Introduce a requirement for any works covered by the Disabled Facilities Grant or discretionary housing improvement grants to meet level D EPC rating in privately owned accommodation	Private Sector Housing (Grants)	Ongoing resource from Private Sector Housing (Grants)	2	December 2016, with monitoring of action considered after this date.	tbc	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Public health and awareness raising	8	Ensure that Directors of Public Health (DsPHs) have been fully briefed on the scale of the problem in your local authority area; what is being done, and what is needed. A briefing should be provided.	Environmental Protection and Public Health Team		n/a (Benefits potentially significant but unquantifiable)	Already provided as part of the consultation for this document	Health Protection Committee will be required to sign off all Annual Status Reports	
Public health and awareness raising	8A	The Council's political leadership will champion the issue of air quality inside and outside of the borough	Members of the Council, as designated	Ongoing resource from Members in exercising this role	n/a (Benefits potentially significant but unquantifiable)	Recommended by the Sustainable Development Scrutiny Committee and approved by M&C with a promotion campaign proposed for the beginning of 2017.	Report back to GLA on review and outcome with actions.	
Public health and awareness raising	9	Public Health Teams should be supporting engagement with local stakeholders (businesses, schools, community groups and healthcare providers). They should be asked for their support via the DsPH when projects are being developed.	Public Health Team	Ongoing resource from Public Health and other teams involved	n/a (Benefits potentially significant but unquantifiable)	Different initiatives being considered and developed over period of Action Plan.	Report back on projects to GLA through ASRs	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Public health and awareness raising	10	Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population	Public Health and Environmental Protection	Ongoing resource from Public Health and Environmental Protection Team	n/a (Benefits potentially significant but unquantifiable)	Already have a JSNA.	Health Protection Committee will review at time of sign off, for the Annual Status Report.	
Public health and awareness raising	11	Strengthening co-ordination with Public Health by ensuring that at least one Consultant-grade public health specialist within the borough has air quality responsibilities outlined in their job profile	Public Health Team	Ongoing resources from Public Health Team	n/a (Benefits potentially significant but unquantifiable)	This is part of the health protection remit of one of the Consultants in Public Health.	Health and Wellbeing Strategy delivery plan will be reviewed for 2018 – 2020 to incorporate air quality.	
Public health and awareness raising	12	Director of Public Health to sign off Statutory Annual Status Reports and all new Air Quality Action Plans	Public Health Team	Ongoing resources from Public Health Team	n/a (Benefits potentially significant but unquantifiable)	Will be signed off at Health Protection Committee.	Through Health Protection Committee	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Public health and awareness raising	13	Ensure that the Head of Transport has been fully briefed on the Public Health duties and the fact that all directors (not just Director of Public Health) are responsible for delivering them, as well as on air quality opportunities and risks related to transport in the borough. Provide a briefing which can be disseminated amongst the Transport team.	Environmental Protection and Public Health Team	Ongoing resources from Environmental Protection and Public Health Team	n/a (Benefits potentially significant but unquantifiable)	Already implemented as part of consultation for this document.	The Steering Group will meet on a 6 monthly basis to provide ongoing briefing,	
Public health and awareness raising	14	Engagement with businesses – Delivery and Servicing Plans (DSP) delivered through Planning process	Environmental Protection/ Public Health/ Transport/ Planning	Dependent on project initiated	3	DSP Condition already introduced. Impact of reduction will be ongoing. Different initiatives being considered and developed over period of Action Plan.	Number of applications for the discharge of the DSP condition approved. Report back on future projects to GLA through ASRs	
Public health and awareness raising	15	Promotion of availability of airTEXT	Environmental Protection Team	Ongoing resources from Environmental Protection Team.	3	Reviewing opportunities for communication by April 2017.	Report back on projects to GLA through ASRs	See consultation response

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Public health and awareness raising	16	Encourage schools to join the TfL STARS accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme	Sustainable Transport Team	LiP funding from the LiP (TfL)	2	Already in operation with 80% of schools in the borough having an accreditation in 15/16	Report back on projects to GLA through ASRs	
Public health and awareness raising	17	Air quality at schools – offer an air quality/sustainability play for year 6 pupils at 28 schools.	Environmental Protection and Sustainable Transport Team	£12,000 LiP funded	3	Review ongoing opportunities for School engagement through action plan period.	Report back on projects to GLA through ASRs	
Delivery servicing and freight	18	Update local authority Procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation	Procurement Team	Ongoing resources from Procurement Team	3	Review policies including PPQ and ITT by April 2017 for implementation.	Report back on review and outcomes to GLA through ASRs	
Delivery servicing and freight	19	Update Procurement policies to ensure sustainable logistical measures are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria)	Procurement Team	Ongoing resources from Procurement Team and Energy Efficiency	3	Asset Management Strategy 2015-2020 produced. Procurement to review by April 2017	Report back on review and outcomes to GLA through ASRs	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Delivery servicing and freight	20	Re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/ or requiring that council suppliers participate in these	Transport and Procurement Team	Ongoing resources from Transport and Procurement Team	3	Review construction freight consolidation by April 2017 for MAQF area. Review sites available for Council suppliers by April 2017	Report back on review and outcomes to GLA through ASRs	
Delivery servicing and freight	21	Virtual Loading Bays and priority loading for ultra-low emission delivery vehicles	Parking Team	Ongoing resources from Parking Team	1	To be considered at next Parking review in 2017	tbc	
Borough fleet actions	22	Join the Fleet Operator Recognition Scheme (FORS) for the borough's own fleet and obtain Gold accreditation	Fleet (S.G.M Environment) Team	Ongoing resources from Fleet Team	2	Applied for FORS membership. Reviewing accreditation April 2017	Report back on review and outcomes to GLA through ASRs	
Borough fleet actions	23	Increasing the number of hydrogen, electric, hybrid, bio-methane and cleaner vehicles in the boroughs' fleet	Fleet (S.G.M Environment) Team	High Costs	3	Working with LoCITY to increase the availability and uptake of low emission commercial vehicles.	Report back on review and outcomes to GLA through ASRs	
Borough fleet actions	24	Accelerate uptake of new Euro VI vehicles in borough fleet	Fleet (S.G.M Environment) Team	High Costs	3	49 trucks to be changed to Euro 6 by April 2017.	Report back on review and outcomes to GLA through ASRs	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Borough fleet actions	25	Smarter Driver Training, or equivalent, for drivers of vehicles in Borough Own Fleet i.e. through training of fuel efficient driving and providing regular re-training of staff	Fleet (S.G.M Environment) Team	Ongoing resources from Fleet Team	3	Already provided through 'Safe City Driving' course.	Report back on review and outcomes to GLA through ASRs	
Localised solutions	26	Improvement and Introduction of green spaces in new developments through the Planning process by conditions and S106 obligations.	Planning	Ongoing resource required from Parks to review and make recommendations regarding the discharge of conditions. Planning Officer time taken to discharge conditions.	2	Already in operation. Impact of reduction will be ongoing.	Greenspace provision is proportionate to scale of development and will be monitored through the approval & discharge of conditions & obligations.	Urban greening strategies. Considered on a site by site basis as new development is proposed. (Core Strategy Policy 12)
Localised solutions	27	Low Emission Neighbourhoods (LENs)	Environmental Protection for review	High	1	Not being considered for this Action Plan, unless specific resources made available	To be reviewed for future Round 3 MAQF bidding 2019-2022	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Cleaner transport	28	Discouraging unnecessary idling by vehicles near schools	Environmental Protection and Sustainable Transport Team	Ongoing resource required from Environmental Protection Team and £3,000 from Road Safety and Sustainability Team	2	Run an 'anti idling' poster competition at 15 priority schools and provide each participating school with a road side banner for a summer campaign by April 2017.	Report back on review and outcomes to GLA through ASRs	
Cleaner transport	28A	Carry out a Council wide anti-idling campaign discouraging unnecessary idling by vehicles	Environmental Protection, Sustainable Transport and Communications Team	Ongoing resource required from Environmental Protection and Communications Team	2	Review date by April 2017, coordinating with summer school campaign	Report back to GLA on review and outcome of campaign.	
Cleaner transport	29	Speed control measures e.g. lowering the legal speed limit to 20mph in built up residential areas	Transport Team	Ongoing resource from Transport Team	2	All Lewisham Roads to introduce 20 mph zone September 2016	Reviewing opportunities in January 2017 for modeling air quality where streetscape schemes are planned within Air Quality Focus Areas.	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Cleaner transport	30	Expanding car clubs and increasing the proportion of electric, hydrogen and ultra low emission vehicles in Car Clubs	Transport/ Parking and Planning Team	Ongoing resource from Parking Team	2	Increasing number of car club bays through Planning process. Work with car clubs towards compliment of electric vehicles. Review April 2017.	Report back on review and outcomes to GLA through ASRs	Introduced as part of Travel Plans for new development
Cleaner transport	31	Very Important Pedestrian Days (e.g. no vehicles on certain roads on a Sunday) and similar initiatives	Sustainable Transport and Environmental Protection	Ongoing resource required from Sustainable Transport and Environmental Protection Team	2	Review opportunities through community groups by April 2017.	tbc after April 2017 review date	
Cleaner transport	32	Free or discounted parking charges at existing parking meters for zero emission cars	Parking Team	High	2	Only achieved through the cashless meter's model. To be considered at next Parking review in 2017	tbc	
Cleaner transport	33	Free or discounted residential parking permits for zero emission cars	Parking Team	Ongoing resource from Parking Team	3	Discounted residential parking permits already available for zero emission vehicles.	The annual parking report provides a % against total permits issued and will be reported to GLA through ASRs	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Cleaner transport	34	Surcharge on diesel vehicles below Euro 6 standards for Resident and Controlled Parking Zone permits	Parking Team	Ongoing resource from Parking Team	3	To be considered at next Parking review in 2017	tbc	
Cleaner transport	35	Installation of residential electric charge points	Planning, Parking and Transport Team	Ongoing resource from Planning, Parking and Transport	1	For all planning major site developments 20% active charging points and 20% passive installed. Through Source London, Blue Point maintain EVCPs and expanding network from 10 sites. By April 2017 to include at least an additional 14 locations.	Report back on review and outcomes to GLA through ASRs	Local Policy and Local List requirement.
Cleaner transport	35A	Carry out a campaign to promote the use of electric charge points within the borough.	Planning, Parking, Transport, Environmental Protection and Communications Team	Ongoing resource from Parking, Transport, Environmental Protection and Communications Team	1	Coordinate the campaign with the increase of EVCPs planned for March 2017.	Report back to GLA on feedback to campaign and monitor increase in numbers of residents using EVCPs.	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Cleaner transport	36	Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	Transport and Parking Team	Ongoing resource from Transport and Parking	2	Already in communication with TfL in potential for establishing points.	Report back on progress to GLA through ASRs	
Cleaner transport	37	Reprioritisation of road space; reducing parking at some destinations and or restricting parking on congested high streets and A roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic	Transport and Parking Team	Ongoing resource from Transport and Parking	2	The proposed Controlled Parking Zone (CPZ) Programme will be approved annually at Executive Director level in line with its Parking policy. Cycle superhighway 4, Evelyn street corridor, developing designs 2016-18 for delivery 2018/19	Lewisham's Annual Parking Report will provide progress and delivery of CPZs and will be reported to GLA through ASRs. Cycle superhighway reported to TfL through a LiP yearly report	

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
Cleaner transport	38	Provision of infrastructure to support walking and cycling	Transport and Planning	Ongoing resource from Transport and Planning. LiP funding.	1	Already have an existing programme for provision. See 2.2 for details. Quietway cycle routes along existing local cycle network alignments 21 and 22, upgrading to encourage new and less confident cyclists development 2016/17 build 2018	Reported to TfL through a LiP yearly report.	
Cleaner transport	39	Develop a 'stand-alone' Cycling Strategy for the borough.	Transport	Ongoing resource from Transport.	1	Being developed 2016/17 and published in 2018	Internal reporting and LiP yearly reporting.	Focus on specific cycling related projects and issues
Cleaner transport	40	Increasing cycle parking	Transport	£100,000 Annual Lip funding	1	Ongoing. Already being provided but will be increased year on year.	Internal reporting and LiP yearly reporting on increase in parking	Residential, community and Rail station parking

Action category	Action ID	Action description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	How implementation will be monitored	Further information
GLA AQ FOCUS AREA 1 & 2 Cleaner Transport	41	Development of a Zonal Construction Logistic Framework for the Evelyn Street Corridor (including New Cross area)	Environmental Protection, Transport and Planning	£305,250 over 3 years 2016-2019. funded through MAQF R2 and part match funded by Lewisham Transport	1	Quarterly review with GLA on progress. Air Quality benefits to be quantified during progress.	Report back on progress to GLA through ASRs	
GLA AQ FOCUS AREA 3 & 4 Public health and awareness raising	42	Provision of public art along the Brockley Corridor to raise awareness on air quality (also bordering Honour Oak Park)	Culture Development, Environmental Protection and Planning	£17,000 provided as part of the MAQF R1 fund	2	Consultation with Local Assembly and local community, to be installed by the end of 2016	Report back on progress to GLA through ASRs	
GLA AQ FOCUS AREA 3 Cleaner Transport	43	Road Layout changes along the Crofton Park area of the Brockley corridor	Transport, Environmental Protection	Originally part of the MAQF R1 funding, but now through Local Transport Fund	2	Works planned for 2017/18	Report back on progress to GLA through ASRs	

Actions for the other GLA Air quality Focus Areas will be reviewed in April 2017 and reported to GLA through ASRs (see page 9 for further information).

Magnitude of Air Quality Benefits

High = 1 Medium = 2 Low = 3

Appendix A

Summary of Consultation Resident's Consultation Responses

(303 Resident consultation responses completed)

Over 50% of respondents felt that Air Quality had got worse compared to a year ago.

Nearly all respondents saw traffic as being a main source of the problem and 70% of respondents identifying construction as a source, with industry and domestic/commercial fuel use identified as a source but to a lesser extent.

Traffic was identified as a main priority for the AQAP with emissions specifically from commercial delivery vehicles and freight being particularly important for consideration.

In relation to Emissions from developments and buildings; Localised solutions; Public health and awareness raising 40-50% respondents identified these as being Very Important

Over 69% of respondents were likely or very likely to introduce further energy efficiency measures within their home.

Respondents were asked whether they wished to receive information on Boiler Cashback information and 60 respondents replied requesting information.

Over 16% of respondents have a diesel cars that are older than September 2014, pre-Euro 6 engines, required when the Ultra Low Emission Zone is introduced.

Nearly 20% of those that had this aged diesel car answered that they are very likely or quite likely to purchase a more environmentally friendly car if cheaper resident parking and controlled parking zone parking was introduced for cars that complied with modern pollution standards. See Table 1 and 2, for details on responses received.

When asking whether respondents currently have a motor vehicle, 62.58% said YES, with 36.09 replying NO and 1.32% with no response.

Only 1.66% owned a zero emission vehicle. The main reason for not purchasing one was the cost and the availability of the infrastructure i.e. electric charging points.

If discounted parking meter charges were introduced for zero-emission cars, nearly 25% indicated that they were very likely or quite likely to purchase a zero-emissions car in the future.

See Table 3 and 4, for details on response received.

Over 85% of respondents thought the introduction of night-time deliveries, where noise disturbance to residents can be minimised, was a very good or good idea.

43% of respondents reported that there was someone in their household that has a health condition affected by poor air quality.

101 respondents requested further information about AirText, a free text and phone application service which provides alerts where high levels of pollution are forecast and relevant health advice for those with breathing conditions.

Nearly 80% of respondents were not aware of the free service available.

Likely to introduce measures

Question responses: 286 (94.70%)

If discounted parking meter charges were introduced for zero-emission cars, how likely would you be to purchase a zero-emissions car in the future?

Table. 1

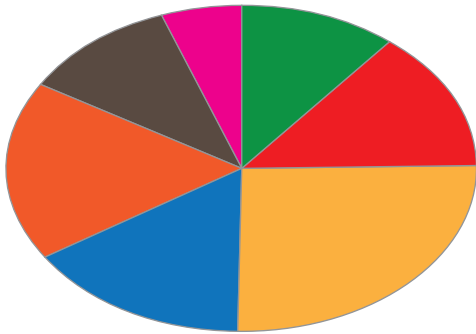


Table. 2

		% Total	% Answer	Count
Very likely		10.93% ■	11.54%	33
Quite likely		13.91% ■	14.69%	42
Neutral		25.50% ■	26.92%	77
Unlikely		15.56% ■	16.43%	47
Very unlikely		17.88% ■	18.88%	54
Don't know		10.93% ■	11.54%	33
[No Response]		5.30% ■	--	16
	Total	100.00%	100.00%	302

Question responses: 163 (53.97%)

If yes to 'Do you have a diesel car that is older than September 2014': If cheaper resident parking and controlled parking zone parking was introduced for cars that complied with modern pollution standards, would you be likely to purchase a more environmentally friendly car?

Table. 3

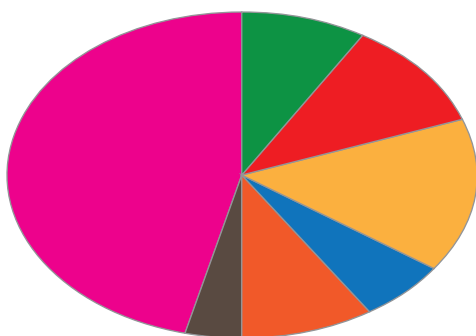


Table. 4

		% Total	% Answer	Count
Very likely		8.61% ■	15.95%	26
Quite likely		10.93% ■	20.25%	33
Neutral		15.23% ■	28.22%	46
Unlikely		6.29% ■	11.66%	19
Very unlikely		8.94% ■	16.56%	27
Don't know		3.97% ■	7.36%	12
[No Response]		46.03% ■	--	139
	Total	100.00%	100.00%	302

Additional consultation response from Lewisham Cyclist Group

Generally the group felt that the consultation questionnaire focused on questions around the motor car and didn't consider alternative active modes of travel such as walking and cycling, particularly as significant numbers of Lewisham residents and households do not have access to a motor car.

The cyclist group would have liked a question that might have identified how many people would choose to cycle if they had somewhere secure to store cycles.

The group stated that, 'we are currently working with the council in the preparation of a cycling strategy which considers pollution and public health. We would welcome the opportunity to discuss this issue further with council officers.'

Response: The questionnaire focus was to pick up specific areas of the GLA Air Quality Action Matrix, where residents could have an input into shaping the actions. The AQAP has identified one of the four Air quality priorities in Lewisham as 'Expanding the Council's Sustainable Transport Infrastructure' see 2.2 of the this AQAP. This includes work being carried out as part of the 'North Lewisham Links Project' and the 'Quiet Ways' project, both of which are providing infrastructure for cycling and walking (active modes of transport). It has therefore considered the concerns raised by the cyclists group but it is accepted that the specific questions didn't seek to find out how many more people would like to choose an active mode of travel and what would help them to do so. The response however has been shared with our Transport Team as they develop the cycling strategy.

As a result of discussion with the Transport team and the consultation response a further two actions were added specifically relating to cycling. Action 39 to develop a 'stand-alone' Cycling Strategy for the borough and Action 40 to increase cycle parking.

Statutory Consultation Responses

Greater London Authority and Transport for London

Dear Chris,

Thank you for the opportunity to comment on your Air Quality Action Plan (AQAP). This response represents a combined response between the GLA and TfL.

Thank you for the acknowledgement of the LLAQM templates resources and support in the forward from your Cabinet Member, Cllr Onikosi. I'm very glad that we have been able to be of help!

The report provides a very good level of local information, especially with regards to existing and planned air quality projects, and it is good that you added additional local projects into the action plan alongside the Matrix actions.

We have a number of specific points:

- Suggest the maps on page 9 and 10 should be shrunk and rotated so that they are orientated the same way as the rest of the document.
- It is very positive that you are looking to allocate S106 funding for action in focus areas. We look forward to the outcome of your review of focus areas in April 2017.
- The pie charts look a bit stretched – they seem like they might need reformatting.
- Suggest that (certainly for the online version) the action table is either condensed to portrait or that the orientation of the document is changed in this section to landscape so that the table is the correct way round.
- Action 1 – the statement that it will be monitored via the “good practice guidance” is not clear – what does this mean?
- Action 2 and most of the other actions. With regards to monitoring it would be useful to state what internal processes will be in place to monitor these. For example, for Action 2 could it be “number of NRMM conditions recorded, and all sites checked on the NRMM database once construction begins” or similar?
- Actions - It would be beneficial if some (if not all) of the actions had specific targets/measurables/objectives against them, so it will be clear what you aim to deliver as well as how you aim to deliver them.
- Finally, we suggest it would be good if you also considered/added an action around the new opportunity to work with TfL, GLA and London Councils to deliver additional charging points and ultra low emission car club vehicles through the Go Ultra Low City scheme funding from OLEV. Please do let me know if you would like more information on this.

Please don't hesitate to contact me if you have any questions.

Response: All changes were considered at the September AQAP Steering Group and relevant changes incorporated within the draft AQAP.

Statutory Consultation Responses (Cont)

Environment Agency

(copy of response is available through the Environmental Protection Team):

The EA suggested adding an action to identify and manage the impact of growth and regeneration on waste management and industrial process regulated under the Environmental Permitting Regulations. This was for the purpose of managing the impact of the air quality emissions from EA managed sites.

Response: This action was not incorporated within the AQAP, as it is predominantly relating to Planning Policy and EA management of emissions from their own regulated sites.

The EA suggested adding an action to review and enforce emission management control techniques at facilities the Council regulates under the Environmental Permitting Regulations.

Response: The contribution to the background levels of air pollution from processes regulated by the Council is minimal. Information on Part B processes in Lewisham are provided to DEFRA on a yearly basis in order that their emissions can be included in the London Air Emission Inventory (LAEI) database. The majority of Part B processes in the Borough are dry cleaning installations and petrol filling stations. Lewisham will continue to carry out regular and detailed inspections to ensure that emissions from Part B processes do not exceed national air quality objectives and any emissions produced are minimised as far as is practicably possible. This will however be done through the Environmental Permitting Regulations as it isn't considered necessary to include as an additional action within this new draft AQAP.

The EA requested details and rational within the AQAP on air quality monitoring being undertaken.

Response: This draft AQAP has been produced to identify actions to reduce emissions, particularly Nitrogen Dioxide. The monitoring results from Lewisham's air quality monitoring network is required to be submitted on a yearly basis to the GLA as part of the LLAQM process via the Annual Status Report (ASR).