

Overview and Scrutiny



Sustainable Development Select Committee Agenda

Monday, 27 June 2022

7.00 pm, Civic Suite, Lewisham Town Hall, London SE6 4RU

For more information contact: Timothy Andrew
(timothy.andrew@lewisham.gov.uk) 020 8314 7916

This meeting is an open meeting and all items on the agenda may be audio recorded and/or filmed.

Part 1

Item	Pages
1. Election of Chair and Vice-Chair	
2. Minutes of the meeting held on 17 February 2022	3 – 6
3. Declarations of interest	7 – 10
4. Responses from Mayor and Cabinet	11 – 25
5. Flood risk management strategy	27 – 75
6. Air Quality Action Plan 2022-27	77 – 389
7. Assets update	391 – 397
8. Select Committee work programme	399 - 427

Sustainable Development Select Committee Members

Members of the committee, listed below, are summoned to attend the meeting to be held on Monday, 27 June 2022.

Kim Wright, Chief Executive
Friday, 17 June 2022

Councillor James Royston (Chair)	
Councillor Edison Huynh (Vice-Chair)	
Councillor Tauseef Anwar	
Councillor Liam Curran	
Councillor Sian Eiles	
Councillor Aisha Malik-Smith	
Councillor Oana Olaru	
Councillor Mark Ingleby (ex-Officio)	
Councillor Ese Erheriene (ex-Officio)	

MINUTES OF THE SUSTAINABLE DEVELOPMENT SELECT COMMITTEE

Thursday, 17 February 2022 at 7.00 pm

IN ATTENDANCE: Councillors Louise Krupski (Chair), Obajimi Adefiranye and Mark Ingleby

ALSO JOINING THE MEETING VIRTUALLY: Councillors James-J Walsh (Vice-Chair) and Suzannah Clarke

APOLOGIES: Councillor Leo Gibbons

ALSO PRESENT: Patrick Codd (Cabinet Member for Environment and Transport) and Timothy Andrew (Scrutiny Manager)

ALSO PRESENT VIRTUALLY: Paul Boulton (Head of Highways), Zahur Khan (Director of Public Realm), Louise McBride (Head of Strategic Transport), David Syme (Head of Strategic Planning) and Emma Talbot (Director of Planning)

NB: Those Councillors listed as joining virtually were not in attendance for the purposes of the meeting being quorate, any decisions taken or to satisfy the requirements of s85 Local Government Act 1972

1. Minutes of the meeting held on 18 January 2022

- 1.1 Councillor Adefiranye asked for a clarification of the record of attendees at the meeting on 18 January 2022.
- 1.2 Subject to the clarification on attendance – it was agreed that the minutes were an accurate record of the meeting.
- 1.3 **Resolved:** that the minutes of the meeting held on 18 January 2022 be agreed as an accurate record.

2. Declarations of interest

- 2.1 Councillor Ingleby declared an interest in relation to item four as the Chair of the Friends of Grove Park nature reserve (which lies within the proposed Grove Park urban district park).
- 2.2 Councillor Clarke declared an interest in relation to item four as a member of the Grove Park neighbourhood forum.

3. Infrastructure delivery plan

- 3.1 David Syme (Head of Strategic Planning) introduced the report - setting out the process for preparing the plan, the changes that had been made and the relationship between this plan and the development of the Local Plan. The following key points were noted:

- The infrastructure delivery plan identified the strategic infrastructure required to support the level of growth anticipated in the borough. This included social infrastructure, green spaces, transport requirements and utilities.
- It focused on strategic requirements and did not capture all development needs. Local needs would be further considered as part of the assessment of major planning applications through the community infrastructure and section 106 processes.
- A range of partners were consulted on the development of the plan.
- Work had taken place with the Greater London Authority to determine the impact of the pandemic and Britain's departure from the European Union on population growth. The population figures were not dissimilar from those used in the early versions of the plan.
- It is intended that the infrastructure delivery plan becomes a delivery document, in line with the Council's capital programme.

3.2 David Syme and Emma Talbot (Director of Planning) responded to questions from the Committee and the following key points were noted:

- The annual infrastructure funding statement would detail all community infrastructure and section 106 spending.
- The Council had adopted a proactive approach to the co-location of public services.
- Further information could be provided about leisure facilities in Whitefoot.
- The Council's regeneration and capital strategy boards prioritised spending on community infrastructure projects. Officers recognised the importance of green space.
- Consideration would be given to including additional information about the urban district park in the infrastructure delivery plan. Further work was taking place on mapping and assessing the potential for a district park in Grove Park.
- There had been some deregulation of planning classes – making it slightly more difficult to prioritise certain types of development.
- An amendment would be made to the description of youth services in Grove Park.
- Consideration would be given to the naming of the potential district park in Grove Park – whilst recognising the importance of using planning terminology and the wishes of the local community.
- A new air quality management plan was currently in development.
- It was recognised that there had been a focus on the north of the borough in previous local plans – because of the extent of development in the north of the borough.
- Consideration would be given to preparing an accessible summary document of the plan to be shared more widely.
- It was intended that the plan be regularly updated.
- There were requests from partner organisations that it would not be possible to fulfil. There would be ongoing discussions with stakeholders.

3.3 In Committee discussions the following key points were also noted:

- Members highlighted the perceived discrepancy between development in different areas of the borough (specifically the divide between north and south)
- Members would welcome additional financial information in the plan.

3.4 **Resolved:** The Committee recommended that further training for all members be provided on the contents of the plan. Members believe that consideration should be given to creating an easy read/accessible version of plan. It also recommended that the annual review of the plan should include the Chair of the Sustainable Development Select Committee.

4. Responses from Mayor and Cabinet

4.1 **Resolved:** that the response from Mayor and Cabinet be noted.

5. Implementation of the Transport Strategy: walking, cycling and healthy neighbourhoods

5.1 Zahur Khan (Director of Public Realm), Louise McBride (Head of Strategic Transport) and Paul Boulton (Head of Highways) introduced the report – outlining the achievements and challenges in delivering the transport strategy and local implementation plan. This included an overview of pressures on budgets, reprioritisation and the future of the healthy neighbourhoods programme.

5.2 Zahur Khan and Louise McBride responded to questions from the Committee – the following key points were noted:

- Data from Transport for London was used to determine the areas in which people were more likely to walk and cycle. It was recognised that consideration needed to be given to the demographics of local populations.
- It was recognised that consultations should consider people in areas surrounding proposed low traffic neighbourhoods – whilst also being meaningful and manageable.
- Air quality monitoring was an important part of the assessment of health streets programmes.
- It was originally anticipated in the transport strategy that there would be two or three healthy neighbourhoods delivered each year – but this was dependent on funding being available.
- The future availability of funding from Transport for London was still unclear. Funding was an issue across London.
- Work was taking place with (and around schools) to support the schools streets programme.
- Work was coordinated between the Council's transport, highways, cycling and healthy neighbourhoods initiatives.
- Creating an active travel fund would be a challenge due to the availability of funding. A number of projects were ready to begin but the funding was not yet available.
- Officers would welcome suggestions to improve options and opportunities for active travel.

- Officers would engage with Transport for London regarding the experimental traffic order (and the associated signage) on the A21.
- Officers would consider innovations and schemes in other boroughs for implementing active travel schemes.

5.3 In Committee discussions the following key points were also noted:

- Members would welcome the development of an active travel fund –for schemes that were ready to be delivered depending on available funding.
- The report that 70% of local implementation plan projects had been delivered with of half of the funding made available was welcomed and praised.
- The importance of improving air quality and local green spaces was emphasised.
- Deprivation should be one of the key measures used to determine the location of new healthy neighbourhood programmes.
- There might be novel approaches to accessing and creating funds for active travel schemes.

5.4 **Resolved:** that the report be noted.

6. Select Committee work programme

6.1 The Committee considered the final work programme report for the 2021-22 municipal year. Members also discussed the 2022-23 work programme - the following suggestions for the programme were noted:

- The air quality action plan and flood risk management strategy for the Committee’s first meeting.
- 15 minute neighbourhoods
- The circular economy
- Food strategy
- The Council’s emergency planning and disaster recovery protocols
- The reopening of Council services
- Major planning developments
- Asset strategy and the commercial estate
- The regeneration of Catford Town Centre

6.2 **Resolved:** that the work programme report be noted.

The meeting ended at 9.05 pm

Chair:

Date:



Sustainable Development Select Committee

Declarations of Interest

Date: 2022-23

Key decision: No

Class: Part 1

Ward(s) affected: None specific

Contributor: Jeremy Chambers (Director of Law, Governance and Elections)

Outline and recommendations

Members are asked to declare any personal interest they have in any item on the agenda.

1. Summary

1.1. Members must declare any personal interest they have in any item on the agenda. There are three types of personal interest referred to in the Council's Member Code of Conduct:

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests.

1.2. Further information on these is provided in the body of this report.

2. Recommendation

2.1. Members are asked to declare any personal interest they have in any item on the agenda.

3. Disclosable pecuniary interests

3.1 These are defined by regulation as:

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:
 - (a) that body to the member’s knowledge has a place of business or land in the borough; and
 - (b) either:
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

4. Other registerable interests

4.1 The Lewisham Member Code of Conduct requires members also to register the following interests:

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

5. Non registerable interests

- 5.1. Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

6. Declaration and impact of interest on members' participation

- 6.1. Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take not part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- 6.2. Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph 6.3 below applies.
- 6.3. Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- 6.4. If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- 6.5. Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

7. Sensitive information

- 7.1. There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

8. Exempt categories

- 8.1. There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-
- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
 - (b) School meals, school transport and travelling expenses; if you are a parent or

guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor

- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception).

9. Report author and contact

- 9.1. Jeremy Chambers, Director of Law, Governance and Elections [Jeremy Chambers@lewisham.gov.uk](mailto:Jeremy.Chambers@lewisham.gov.uk), 020 83147648



Mayor and Cabinet

Response to Sustainable Development Select Committee – Local Plan

Date: 9th March 2022

Key decision: No

Class: Part 1

Ward(s) affected: all

Contributors: David Syme, Head of Strategic Planning

Outline and recommendations

This report addresses a number of outstanding scrutiny matters and provides a response to Mayor and Cabinet. The report covers officer's responses to comments made by Sustainable Development Select Committee on the Local Plan at its meeting of 15th September 2021.

Timeline of engagement and decision-making

21 st January 2020	Lewisham Local Plan - Regulation 18 stage “main issues and preferred approaches” presented to Sustainable Development select Committee.
11 th March 2020	Lewisham Local Plan - Regulation 18 stage “main issues and preferred approaches” presented to Mayor and Cabinet and approved for public consultation.
25 th November 2020	Lewisham Local Plan - Regulation 18 stage “main issues and preferred approaches” presented to Council and approved for public consultation.
Jan/Apr 2021	Regulation 18 stage “main issues and preferred approaches” consultation
23 rd November 2022	Lewisham Local Plan - Regulation 19 stage “proposed submission” presented to Sustainable Development select Committee.

1. Summary

- 1.1. This report addresses a number of outstanding scrutiny matters and provides a response to Mayor and Cabinet. The report covers officer’s responses to comments made by Sustainable Development Select Committee on the Local Plan at its meeting of 23rd November 2021.

2. Recommendations

- 2.1. Mayor and Cabinet is recommended to approve the officers’ response and report to the Sustainable Development Select Committee (SDSC).

3. Sustainable Development Select Committee referral

- 3.1. At its meeting of 23rd November the SDSC resolved that the Committee would refer its views to Mayor and Cabinet as follows:
 - a) The Committee welcomes the updates to the Local Plan and it congratulates the planning team for its efforts in engaging with residents – particularly in the context of the difficulties posed by the global pandemic. The Committee believes that the benefits of the online engagement carried out should be captured, the valuable lessons learned and that the good practice identified should be disseminated across the Council. Members also note and welcome the work to ensure seldom heard voices are given further opportunity to feed into this key place making document.

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- b) The Committee notes the motion of full Council supporting the creation of an integrated district park in Grove Park as an essential part of the borough's green infrastructure.
- c) The Committee recommends that the Grove Park District Park should be specifically named and included in the Lewisham Local Plan as well as the updated Infrastructure Delivery Plan (which supports the Local Plan).
- d) The Committee also recommends that the Grove Park District Park should be included in Lewisham's strategic infrastructure list of green infrastructure.
- e) Furthermore, the Committee believes that all of the borough's sites of importance for nature conservation (SINCs) should be individually named.

4. Officers response

- 4.1. Officers have considered the SDSC referral and the response to each point is set out below:
 - a) Noted. A consultation statement will be prepared as part of the Regulation 19 "proposed submission" stage of the Local Plan. This can be disseminated across the Council.
 - b) Noted.
 - c) At its meeting on the 21st July 2021 Council passed a motion on Grove Park District Park to support the creation of an integrated district park. The Local Plan and the Infrastructure Delivery Plan (IDP) will reference this ambition.
 - d) Officers will include reference to the District Park within the strategic infrastructure list in the latest iteration of the IDP.
 - e) A schedule of all the borough's Sites of Importance for Nature Conservation (SINCs) is included within the appendix of the draft Local Plan and will be revised where necessary for the Regulation 19 stage.

5. Financial implications

- 5.1. There are no direct financial implications arising from this report.
- 5.2. It should be noted that Council funding to realise the ambition of the Grove Park District Park is yet to be identified.

6. Legal implications

- 6.1. There are no direct legal implications arising from this report.
- 6.2. The Planning and Compulsory Purchase 2004 (as amended) ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations") set out the requirements and the statutory procedure for the preparation of a Local Plan. Details of the particular requirements are set out in the body of the report.
- 6.3. The approval of proposals for public consultation in connection with the production, alteration or withdrawal of development plan documents which includes the Local Plan is a matter reserved to full Council.
- 6.4. Regulation 19 of the 2012 Regulations states that Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and (b) ensure that a statement of the representations procedure

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and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

- 6.5. The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.6. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
- 6.7. It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed at 11.5 above.
- 6.8. The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 6.9. The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:
- <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>
 - <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>
- 6.10. The Equality and Human Rights Commission (EHRC) has previously issued five

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guides for public authorities in England giving advice on the equality duty:

- The essential guide to the public sector equality duty
- Meeting the equality duty in policy and decision-making
- Engagement and the equality duty: A guide for public authorities
- Objectives and the equality duty. A guide for public authorities
- Equality Information and the Equality Duty: A Guide for Public Authorities

6.11. The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

- <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

7. Equalities implications

7.1. The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.

7.2. There are no direct equalities implications arising from this report.

7.3. The preparation of the Local Plan is being informed by an Integrated Impact Assessment which includes an Equalities Impact Assessment.

8. Climate change and environmental implication

8.1. There are no direct environmental impacts arising from this report.

9. Crime and disorder implications

9.1. There are no direct implications relating to crime and disorder issues.

10. Health and wellbeing implications

10.1. There are no direct implications relating to health and wellbeing issues.

11. Background papers

11.1. Report to Mayor and Cabinet 11th March 2020.

<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=139&MIId=5696&Ver=4>

11.2. Report to Council 25th November 2020.

<https://councilmeetings.lewisham.gov.uk/documents/s76130/Approval%20of%20the%20draft%20Local%20Plan%20for%20public%20consultation.pdf>

11.3. Lewisham's existing adopted Local Development Framework.

<https://lewisham.gov.uk/myservices/planning/policy/ldf> Which includes:

- Core Strategy 2011
- Development Management Local Plan 2014

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- Site Allocations Local Plan 2013
 - Lewisham Town Centre Local Plan 2014
- 11.4. Lewisham adopted IDP.
<https://lewisham.gov.uk/myserVICES/planning/policy/planning/lewisham-infrastructure-delivery-plan--idp---framework-document>
 - 11.5. The current adopted London Plan 2021. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>
 - 11.6. The intend to publish London Plan 2019. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>
 - 11.7. National Planning Policy Framework 2019.
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
 - 11.8. Lewisham Local Plan Regulation 18 Stage “main issues and preferred approaches” document.
<https://lewisham.gov.uk/myserVICES/planning/policy/planning/about-the-lewisham-local-plan>
 - 11.9. Lewisham draft Local Plan website including access to all evidence base documents. [https://lewisham.gov.uk/myserVICES/planning/policy/adopted-local-plan/evidence-base`](https://lewisham.gov.uk/myserVICES/planning/policy/adopted-local-plan/evidence-base)

12. Report author and contact

- 12.1. David Syme
Head of Strategic Planning
Email – David.syme@lewisham.gov.uk

13. Comments for and on behalf of the Executive Director for Corporate Resources

- 13.1. Shola Ojo – Principal Accountant, Financial Services
- 13.2. 02083147778 - Shola.Ojo@lewisham.gov.uk

14. Comments for and on behalf of the Director of Law, Governance and HR

- 14.1. Joy – Joy Ukadike, Senior Planning Lawyer
- 14.2. 02083146908 – Joy.Ukadike@lewisham.gov.uk

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Mayor and Cabinet

Response to Sustainable Development Select Committee – A21 Development Framework

Date: 9th March 2022

Key decision: No

Class: Part 1

Ward(s) affected: Lewisham Central, Rushey Green, Catford South, Whitefoot, Downham

Contributors: David Syme, Head of Strategic Planning

Outline and recommendations

This report addresses a number of outstanding scrutiny matters and provides a response to Mayor and Cabinet. The report covers officer's responses to comments made by Sustainable Development Select Committee on the A21 Development Framework at its meeting of 15th September 2021.

Timeline of engagement and decision-making

30 th April 2019	Local Plan update to Sustainable Development Select Committee reporting on the Homebuilding Capacity Fund Grant from the GLA
Autumn 2020	Early stage discussion with Ward Councillors
Nov/Dec 2020	Pre-Production Consultation led by consultants
15 th September 2021	Draft A21 Development Framework presented to Sustainable Development Select Committee for comment.
6 th October 2021	Draft A21 Development Framework presented to Mayor and Cabinet and approval sort for Public Consultation
14 th October– 12 th November 2021	Public Consultation on the A21 Development Framework
TBC	SDSC Chair review of the revised Draft A21 Development Framework with support expressed for the post-consultation amendments to the document.
March 9 th 2021	Post-consultation Draft A21 Development Framework presented to Mayor and Cabinet for approval

1. Summary

- 1.1. This report addresses a number of outstanding scrutiny matters and provides a response to Mayor and Cabinet. The report covers officer's responses to comments made by Sustainable Development Select Committee on the A21 Development Framework at its meeting of 15th September 2021.

2. Recommendations

- 2.1. Mayor and Cabinet is recommended to approve the officers response and report to the Sustainable Development Select Committee (SDSC).

3. Sustainable Development Select Committee referral

- 3.1. At its meeting of 17th September the SDSC resolved that the Committee would refer its views to Mayor and Cabinet as follows:
 - a) The Committee commends the work carried out by officers. The Committee recognises the calibre and high quality of the work carried out and it recommends that the development framework is adopted.
 - b) The Committee recommends that consideration be given to the future options

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for the framework to be strengthened through its adoption as a supplementary planning document.

- c) The Committee believes that officers should continue to work with Transport for London in order to ensure that collaboration, coordination and funding are made available to support the development of cycling and walking infrastructure along the A21.

4. Officers response

4.1. Officers have considered the SDSC referral and the response to each point is set out below:

- a) Noted.
- b) This will be kept under review and considered in the future.
- c) Officers will continue to liaise with Transport for London and highlight the importance of progressing the A21 design options to support the development of cycling and walking along the corridor.

5. Financial implications

5.1. There are no direct financial implications arising from this report.

6. Legal implications

6.1. There are no direct legal implications arising from this report.

7. Equalities implications

7.1. The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.

7.2. There are no direct equalities implications arising from this report.

8. Climate change and environmental implication

8.1. There are no direct environmental impacts arising from this report.

9. Crime and disorder implications

9.1. There are no direct implications relating to crime and disorder issues.

10. Health and wellbeing implications

10.1. There are no direct implications relating to health and wellbeing issues.

11. Background papers

11.1. Report to Mayor and Cabinet 6th October 2021.

<https://councilmeetings.lewisham.gov.uk/documents/s89640/A21%20Development%20Framework.pdf>

11.2. Lewisham's existing adopted Local Development Framework.

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- Site Allocations Local Plan 2013
 - Lewisham Town Centre Local Plan 2014
- 11.3. The current adopted London Plan 2021. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>
- 11.4. National Planning Policy Framework 2019. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 11.5. Good Quality Homes for All Londoners Housing SPG Consultation Draft (October 2020) <https://consult.london.gov.uk/good-quality-homes-for-all-londoners>

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Mayor and Cabinet

Response to Sustainable Development Select Committee - railway children urban national park - environmental protection and neighbourhood plans

Date: 9th March 2022

Key decision: No

Class: Part 1

Ward(s) affected: all

Contributors: David Syme, Head of Strategic Planning

Outline and recommendations

This report addresses a number of outstanding scrutiny matters and provides a response to Mayor and Cabinet. The report covers officer's responses to comments made by Sustainable Development Select Committee on the railway children urban national park at its meeting of 15th September 2021.

Timeline of engagement and decision-making

15 th September 2020	Railway Children urban national park: neighbourhood plans and environmental protection considered by Sustainable Development Select Committee
21 st July 2021	Council passed a motion on Grove Park District Park to support the creation of an integrated district park.
14 th September 2021	Mayor and Cabinet approved officers response
15 th September 2021	Sustainable Development Select Committee consider Mayor and Cabinet response.
23 rd November 2022	Lewisham Local Plan - Regulation 19 stage “proposed submission” presented to Sustainable Development select Committee.

1. Summary

- 1.1. This report addresses a number of outstanding scrutiny matters and provides a response to Mayor and Cabinet. The report covers officer’s responses to comments made by Sustainable Development Select Committee on the railway children urban national park at its meeting of 15th September 2021.

2. Recommendations

- 2.1. Mayor and Cabinet is recommended to approve the officers’ response and report to the Sustainable Development Select Committee (SDSC).

3. Sustainable Development Select Committee referral

- 3.1. At its meeting of 15th September the SDSC resolved that the Committee would refer its views to Mayor and Cabinet as follows:
 - a) The Committee recommends that Mayor and Cabinet should give consideration to the additional evidence provided by the Friends of Railway Children Walk – as well as the comments and suggestions made by Councillor Ingleby - in determining the potential for the collection of sites of importance for nature conservation within the complex of open spaces situated either side of the Hither Green railway corridor to constitute a broader site of metropolitan importance for nature conservation (MSINC).

4. Officers response

- 4.1. Officers have considered the SDSC referral and the response to each point is set out below:

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- a) Following requests by SDSC and the Friends of Railway Children Walk the Council commissioned London Wildlife Trust to assess the SINC status of the Hither Green Sidings and the combined sites based on the Sites of Metropolitan Importance (SMI) criteria. Officers can confirm that the document provided by Cllr Ingleby following the September SDSC meeting was considered as part of that work and the information provided does not provide any new additional evidence.
- b) The study which included the assessment of the ‘additional evidence’ was published in Dec 2020 and concluded:
 - a. That the Hither Green Siding does not fulfil enough of the SMI criteria to be upgraded to Metropolitan SINC and as such should retain its current status as Borough SINC
 - b. That the combined sites could be considered as a single Site of Metropolitan Importance however, on several important criteria there was insufficient data to determine effectively if the SMI criteria could be met. Additional surveys would therefore be required.
- c) The Wildlife Trust report further noted that as the land in question is designated Borough SINC, Metropolitan Open Land and as a Green Corridor, it is therefore afforded the highest planning protection. Indeed the findings from the Wildlife Trust report states “on matters of site planning protection the combined sites’ current status as Metropolitan Open Land provides greater weight than as a Site of Metropolitan Importance for Nature Conservation”.
- d) Given the Council motion passed on 21st July 2021 that supports the ambition to create an integrated District Park for this area, officers could commission additional survey work as part of the wider open space review currently ongoing as part of the Regulation 19 stage of the Local Plan. However this is not part of the current work programme and as such has not been budgeted for. Approval to undertake these surveys would require additional council funding to be identified. This would be in the region of £15,000 and would need to come from existing budgets, via underspends achieved from reducing other proactive work and holding vacancies. This would reduce the in year underspend of the Planning Service that would deliver a once off in year saving to the Council budget. If that funding is not possible or forthcoming at this stage, the land still benefits from the strongest possible planning protections and would not be at any greater risk of development.

5. Financial implications

- 5.1. As stated in paragraph 4.1d above, should there be an agreement that additional survey work is required, additional funding of £15,000 would be required. No funding has been identified for this so this would have to be met from the overall Planning Service budget. With the current financial position across the Council, the Planning Service, have been undertaking robust budgetary management to seek to deliver an in year underspend. The funding of this work would reduce the underspend achievable.

6. Legal implications

- 6.1. There are no direct legal implications arising from this report.

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7. Equalities implications

- 7.1. The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.
- 7.2. There are no direct equalities implications arising from this report.
- 7.3. The preparation of the Local Plan is being informed by an Integrated Impact Assessment which includes an Equalities Impact Assessment.

8. Climate change and environmental implication

- 8.1. There are no direct environmental impacts arising from this report.

9. Crime and disorder implications

- 9.1. There are no direct implications relating to crime and disorder issues.

10. Health and wellbeing implications

- 10.1. There are no direct implications relating to health and wellbeing issues.

11. Background papers

- 11.1. Report to SDSC 15th September 2020.
<https://councilmeetings.lewisham.gov.uk/documents/s74905/05%20Railway%200children%20urban%20national%20park%20-%20neighbourhood%20plans%20and%20environmental%20protection%20150920.pdf>
- 11.2. Council motion approved 21st July 2021
<https://councilmeetings.lewisham.gov.uk/documents/s84820/Motions.pdf>
- 11.3. Report to Mayor and Cabinet 14th September 2021.
<https://councilmeetings.lewisham.gov.uk/documents/s86334/03%20Response%20from%20Mayor%20and%20Cabinet%20150921.pdf>
- 11.4. Lewisham Local Plan Regulation 18 Stage "main issues and preferred approaches" document.
<https://lewisham.gov.uk/my services/planning/policy/planning/about-the-lewisham-local-plan>
- 11.5. Lewisham draft Local Plan website including access to all evidence base documents. [https://lewisham.gov.uk/my services/planning/policy/adopted-local-plan/evidence-base`](https://lewisham.gov.uk/my services/planning/policy/adopted-local-plan/evidence-base)

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Sustainable Development Select Committee

Lewisham Local Flood Risk Management Strategy 2022-27

Date: 6 July 2022

Key decision: Yes

Class: Part 1

Ward(s) affected:

Contributors: Executive Director Housing, Regeneration and Public Realm. Head of Law. Head of Finance.

Outline and recommendations

Sustainable Development Select Committee is invited to review Lewisham's Local Flood Risk Management Strategy 2022-27.

1. Summary

- 1.1. Upper tier local Authorities in England and Wales are designated as Lead Local Flood Authorities with a number of statutory duties and powers in relation to local flood risk management.
- 1.2. Lead Local Flood Authority responsibilities include a duty to develop, maintain, apply and monitor a strategy setting objectives for local flood risk management and actions to meet those objectives. Lewisham Council originally published a Local Flood Risk Management Strategy in 2015. This report outlines the basis for a new updated Local Flood Risk Strategy 2022-27 and seeks Mayor and Cabinet approval to adopt the strategy in line with local, regional and national priorities.
- 1.3. There are a range of complex and inter-related roles and responsibilities in relation to the management of land, rivers and smaller waterways, for future development and for responding to flood related incidents. Part of Lewisham Council's role as a Lead Local Flood Authority is to work closely with local, regional and national partners to ensure a joined up approach to reducing the risk and impact of flooding across the borough. A key function of the strategy is to ensure clarity in relation to the different responsibilities and help local residents and businesses know what to expect of the different organisations involved.
- 1.4. The last major flooding event within Lewisham was September 1968. Due to heavy rainfall within the catchment caused the River Ravensbourne and its tributaries burst their banks, creating widespread flooding of several hundred residential and commercial properties in the borough.
- 1.5. In January 2022 the UK Climate Change Committee published its assessment of the risks faced by the UK from climate change. The Committee's recommendations to Government reaffirm that adaptation is needed alongside emission reductions to manage the risks and opportunities from climate change in the UK. The Committee reported that the UK's climate has already measurably changed and concludes that further change is inevitable. How much climate change the UK experiences after 2050 is uncertain and will depend on global emissions reductions, but the impacts will include sea level rise, more frequent and higher storm surges, increased winter rainfall, drier summers with periods of more intense summer rainfall. These impacts are likely to increase the frequency and magnitude of flooding events in Lewisham, London and the UK as a whole.
- 1.6. Lewisham's Local Flood Risk Management Strategy has been developed with the involvement of services across the Council, with members and in discussion with local groups and the public including an open public consultation process. The Strategy is intended to be a 5-year programme that will continue to be developed in response to new risks and opportunities as they emerge and in open discussion with residents and other stakeholders.
- 1.7. The strategy focuses on 4 objectives:
 - **Understanding risk** – Risk Management Authorities in Lewisham have a clear understanding of local flood risk and management opportunities and this understanding is shared with partners to create an evidence base for flood risk and how it can be managed to target resources where they are most effective;
 - **Reducing the risk of flooding** – protect the people and businesses of Lewisham from flooding through investment in flood risk management projects and programmes using new or innovative techniques where appropriate;
 - **Resilient Planning** – development and spatial planning in Lewisham takes account of flood risk issues and plans to effectively manage any impacts and through the re-development of previously developed land, reduces overall flood risk;

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- **Resilient Communities** – residents and businesses of Lewisham have access to appropriate data and information to understand flood risk in their area, how it is managed and by who. Communities are empowered to act to protect themselves from flooding through individual efforts, partnerships and joint working.

2. Recommendations

- 2.1. Mayor and Cabinet is recommended to approve Lewisham's Local Flood Risk Management Strategy (2022-2027)

3. Policy Context

- 3.1. Local authority roles and responsibilities on flooding are defined by the Flood Risk Regulations (2009), which transpose the European Union 'Floods Directive' into English and Welsh law, and the Flood and Water Management Act (2010) which implement a series of recommendations following a Government review of widespread flooding events in the first decade of the twenty-first century.
- 3.2. Under this legislation all top tier local authorities (county councils and single tier authorities including London Boroughs) became Lead Local Flood Authorities (LLFAs).
- 3.3. LLFAs were established to manage flood risk from localised sources in their local area, with a key responsibility to develop, maintain, apply, and monitor a strategy for local flood risk management. Other statutory duties and powers for LLFAs include:
 - Producing a Preliminary Flood Risk Assessment;
 - Producing a Surface Water Management Plan;
 - Co-operation with other relevant flood risk authorities;
 - Statutory consultee on planning applications;
 - Recording and investigating all 'significant' flooding incidents;
 - Establishing and maintaining a register of structures which may have a significant effect on flood risk; and
 - Administration and enforcement of consents regarding private changes to ordinary watercourses.
- 3.4. The Environment Agency has responsibility for flood risk in relation to main rivers and tidal flooding.
- 3.5. In January 2022 the UK Climate Change Committee published its assessment of the risks faced by the UK from climate change¹. The Committee's recommendations to Government reaffirm that adaptation is needed alongside emission reductions to manage the risks and opportunities from climate change in the UK. The Committee reported that the UK's climate has already measurably changed and concludes that further change is inevitable. How much climate change the UK experiences after 2050 is uncertain and will depend on global emissions reductions, but the impacts will include sea level rise, more frequent and higher storm surges, increased winter rainfall, drier summers with periods of more intense summer rainfall. These impacts are likely to increase the frequency and magnitude of flooding events in Lewisham, London and the UK as a whole.
- 3.6. The National Planning Policy Framework and accompanying Planning Policy Guidance

¹ <https://www.ukclimaterisk.org/>

emphasise the responsibility of Local Planning Authorities in ensuring that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process.

- 3.7. The Draft Lewisham Local Plan sets the Borough's planning policy position which ensures that development does not increase flood risk to people, properties and infrastructure and that all proposals proactively seek to minimise and mitigate risk wherever possible. The draft local plan can be accessed [here](#).²
- 3.8. The Level 1 Strategic Flood Risk Assessment 2019 and Level 2 Strategic Flood Risk Assessment 2020³ helps to effectively manage flood risk by identifying the spatial variation in risk across the London Borough of Lewisham (the 'Borough') thus allowing an area-wide comparison of future development sites with respect to flood risk considerations. There are several sources of flood risk across the Borough, including: fluvial, tidal, pluvial, groundwater, sewer and artificial.
- 3.9. Lewisham's Parks and Open Space Strategy 2020-25 includes priorities to enhance existing green spaces and deliver eco-systems services and flood storage within parks. This ambition is highly relevant to the Local Flood Risk Management Strategy and is highlighted both in the local context and action plan sections of the Flooding Strategy.
- 3.10. This draft Local Flood Risk Management Strategy is consistent with the 'Greener Future' strand of A Future Lewisham and is aligned with Lewisham's Climate Emergency Action Plan⁴.

4. Lewisham Local Flood Risk Management Strategy

- 4.1. This report and the draft Local Flood Risk Management Strategy are intended to present Mayor and Cabinet with the opportunity to determine the approach the Council will take in response to the threat of local flood risk.
- 4.2. The draft Local Flood Risk Management Strategy contains a wide range of activity of relevance across different Council teams. The actions have been developed with service teams and through a number of cross-cutting forums within the Council. The draft Strategy was also the subject of public consultation that ran from September to November 2021.
- 4.3. There are over 28,000 homes and businesses in Lewisham at risk of flooding. Residents in areas classed as more deprived face higher flood risks than those living in less deprived areas. In the context of an unpredictably changing climate, improving the resilience of our communities is more important than ever before. Partnerships are vital to this effort. The more we plan together, the more we can achieve together for local people, places and our environment.
- 4.4. There is a strong focus, globally and in the UK, on emissions reduction and achieving Net Zero. But Net Zero alone is not enough. Reducing climate impacts requires both emissions reduction and adaptation. The UK will face significant further changes in climate to 2050 and beyond. By 2050 the summer rainfall could fall by as much as 24% with summer downpours becoming more intense and winter rainfall increase by as

² <https://lewisham.gov.uk/myservices/planning/policy/planning/about-the-lewisham-local-plan>

³ <https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/evidence-base/ldf-evidence-base--environment>

⁴ <https://councilmeetings.lewisham.gov.uk/documents/s81350/Climate%20Emergency%20Action%20Plan.pdf>

much as 16%, changes that will impact our well-being, the natural environment and the economy. Unless further action on adaptation is taken, under a 2°C by 2100 warming scenario annual damages from flooding for non-residential properties across the UK is expected to increase by 27% by 2050 and 40% by 2080. At 4°C this increases to 44% and 75% respectively. Adaptive measures need to be implemented to reduce vulnerability to flood risk⁵.

- 4.5. Action on adaptation remains low: under-resourced, underfunded and often ignored. The Third UK Climate Change Risk Assessment concludes that progress with adaptation policy and implementation is not keeping up with the rate of increase in climate risk. Without action on adaptation we will struggle to deliver key Government and societal goals, including Net Zero itself. We cannot rely on nature to sequester carbon unless we ensure that our peat, our trees and our wetlands are healthy, not only today but under the climatic conditions we will experience in the future.
- 4.6. The key principles underpinning Lewisham's draft Local Flood Risk Management Strategy are:
1. Improve the borough's resilience to flooding and protect the most vulnerable:
 - Understand and respond to the impact of a changing climate through a dynamic approach to flood risk management;
 - Target investment and planning on flood risk to support the borough's most vulnerable individuals and communities;
 - Support decision-making across the Council that ensures future development across Lewisham reduces flood risk.
 2. Take an evidence-based approach when assessing investment needs and prioritising project delivery:
 - Use flood risk data and modelling to understand the risks of river, surface water and groundwater flooding;
 - Identify flood infrastructure in the borough and understand their condition and potential impact on flood risk;
 - Ensure the Council takes a strategic approach to flooding through its work as a Lead Local Flood Authority, Highways Authority, Planning Authority and in the service delivery of relevant Council functions.
 3. Work in partnership to deliver multiple benefits through coordinated action:
 - Deliver projects collaboratively with Risk Management Authorities locally, subregionally and across London securing partnership funding to achieve cost effective solutions with a range of benefits;
 - Cooperate with internal stakeholders and service teams to ensure that SuDS (sustainable drainage systems) are integrated into other programmes of works;
 - Integrate adaptation and investment in green infrastructure as part of Lewisham's response to the Climate Emergency promoting a natural and healthy environment for the benefit of residents and wildlife.
- 4.7. The Strategy sets out 4 objectives with actions and key performance indicators for each.

⁵ <https://www.theccc.org.uk>

- **Understanding risk** – Risk Management Authorities in Lewisham have a clear understanding of local flood risk and management opportunities and this understanding is shared with partners to create an evidence base for flood risk and how it can be managed to target resources where they are most effective;
- **Reducing the risk of flooding** – protect the people and businesses of Lewisham from flooding through investment in flood risk management projects and programmes using new or innovative techniques where appropriate;
- **Resilient Planning** – development and spatial planning in Lewisham takes account of flood risk issues and plans to effectively manage any impacts and through the re-development of previously developed land, reduces overall flood risk;
- **Resilient Communities** – residents and businesses of Lewisham have access to appropriate data and information to understand flood risk in their area, how it is managed and by who. Communities are empowered to act to protect themselves from flooding through individual efforts, partnerships and joint working.

5. Financial implications

- 5.1 There are no financial implications arising directly from this report but delivery of the programme to reduce flood risk across the borough as a whole has potentially significant cost implications.
- 5.2 Agreement of funding for specific actions identified in this Strategy will be subject to the Council's existing delegations and decision-making processes.

6. Legal implications

- 6.1. The Flood Risk Regulations (2009) and The Flood and Water Management Act (2010) established the Lead Local Flood Authorities function in England and Wales, giving local authorities statutory duties and powers for local flood risk management in relation to ordinary watercourses, groundwater and surface water flooding.
- 6.2. Lead Local Flood Authority responsibilities include a duty to develop, maintain, apply and monitor a strategy for local flood risk management that sets out the objectives for managing local flood risk and outlines what actions are to be taken to meet those objectives.
- 6.3. As stated in the report and in the financial implications, this report does not commit to any specific actions. Future decisions about specific actions will need to take into consideration the specific local authority powers which are relevant to those actions, and be made in line with existing decision making and legal requirements.
- 6.4 The Council has a public sector equality duty (the equality duty or the duty - The Equality Act 2010, or the Act). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and those who do not;
 - foster good relations between people who share a protected characteristic and those who do not.
- 6.5 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster

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good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above. The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. The decision maker must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.

- 6.6 The Equality and Human Rights Commission (EHRC) has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance. The Council must have regard to the statutory code in so far as it relates to the duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found on the EHRC website.
- 6.7 The EHRC has issued five guides for public authorities in England giving advice on the equality duty. The 'Essential' guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice.

7. Equalities implications

- 7.1. There are no specific equalities implications arising directly from this report but it should be noted that action on flood risk is action on social equality.

8. Climate change and environmental implications

- 8.1. There is substantial evidence that climate change as a result of human activity is linked to increasing frequency and intensity of extreme weather events such as flooding, heat waves, drought and storms. There is no safe level of global temperature rise, and temperatures are already 1°C above pre-industrial levels, and forecast to rise 0.2°C a decade. This evidence is, largely, uncontested. Adaptation to a changing climate, including flood risk management, needs to be a central priority in the response to the climate emergency. The draft Local Flood Risk Management Strategy is informed by and supports the wider aims of Lewisham's Climate Emergency Action Plan.

9. Crime and disorder implications

- 9.1. There are no specific crime and disorder implications arising directly from this report.

10. Health and wellbeing implications

- 10.1. Reducing the risk of flooding within Lewisham will deliver a wide range of health and wellbeing benefits to residents.

11. Background papers

- 11.1. Please include a list of papers, documents and reports that relate to the report's subject matter with hyperlinks if the documents are available on our website.

Surface Water Management Plan (April 2011)

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<https://councilmeetings.lewisham.gov.uk/documents/s3731/Appendix%20%20Surface%20Water%20Management%20Plan.pdf>

Local Flood Risk Management Strategy (June 2015)

<https://lewisham.gov.uk/-/media/files/imported/lewisham-20lfrm-20strategy-20june-202015.ashx>

Strategic Flood Risk Assessment (January 2019)

<https://councilmeetings.lewisham.gov.uk/documents/s64908/Appendix%20%20-%20Strategic%20Flood%20Risk%20Assessment.pdf>

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Lewisham's Local Flood Risk Management Strategy 2022-2027



Foreword

We underestimate the risks from a changing climate at our peril. Lewisham Council, alongside many local authorities up and down the UK, has responded to this global threat by recognising the climate emergency and setting ambitious local targets for action. But the risks we face will not disappear as the world moves to net zero carbon: many of them are already locked in. The question is not whether our climate will change but by how much.

The risks and impacts are understood and backed by science but there is growing concern that the long-term planning needed, particularly at a national level, is not happening at the scale and pace needed.

Lewisham's Flood Risk Management Strategy is therefore hugely important in this context. The last major flooding incident in the borough remains in living memory, but it's now over 50 years since the 1968 floods. While geology and geography have shaped the flow of water in South East London over thousands of years the changing urban landscape and rising global temperature mean the past is no longer a reliable guide to the future.

Taking action on flood risk is vital to protect our most vulnerable individuals and communities. It also creates the opportunity for a wealth of wider benefits. The borough's rivers are a natural asset enjoyed by residents and nature alike. Lewisham's rivers and other water features like the lake at Beckenham Place Park and the Waterlink Way are an accessible and visible part of what makes Lewisham a special place to live and visit.

Trees, plants and permeable areas of softer landscaping are a vital part of slowing down and managing flows of water, recognising and retaining water as a precious resource. This critical infrastructure reduces flood risk, but does so much more: improving local air quality, absorbing carbon, creating habitats and boosting biodiversity while improving the look and feel of our streets and local communities.

We cannot stop all flooding but we can and will reduce the risk the borough faces and minimise the impact of future floods on our communities. This strategy sets out the Council's plans to work with partners nationally, regionally and locally over the next 5 years to create a greener and safer Lewisham.

Councillor Louise Krupski
Cabinet Lead for Environment and Climate Action

Contents

1	Introduction.....	1
	Historic flooding in Lewisham	2
	Roles and responsibilities.....	3
	Local context	5
	Development planning.....	5
	Assessment of local flood risk	5
	Sources of flooding.....	6
	Flood risk.....	8
2	Flood Risk Management	10
	Progress since the previous strategy	10
	Understanding and predicting flooding	11
	Wider benefits	12
3	Principles, Objectives and KPI's	14
	Core principles	14
	Objectives	15
	Objective 1 – Understanding risk and opportunity	16
	Key performance indicators.....	17
	Objective 2 – Reducing the risk of flooding	18
	Key performance indicators.....	21
	Objective 3 – Resilient planning	22
	Key performance indicators.....	23
	Objective 4 – Resilient communities.....	24
	Key performance indicators.....	26
4	Action Plan.....	27
	Glossary.....	32
	List of abbreviations and acronyms	33
	References.....	34
	Appendix 1 – Legislative and strategic context	35
	Appendix 2 – Flood Risk Management Authorities:.....	37

1 Introduction

- 1.1 Over 28,000 homes and businesses in Lewisham are at risk of flooding¹, with areas that score more highly on deprivation measures disproportionately affected. The borough's exposure to flood risk is changing as climate change continues to affect weather patterns in the UK. Lewisham has declared a climate emergency and set the ambition for the borough to be net zero carbon by 2030, but without significant action to cut global carbon emissions the borough needs to adapt in response to the likelihood of more frequent and intense storms, droughts and temperature variations.
- 1.2 Even the most optimistic assessment of international governmental agreements to reduce emissions are based on limiting global warming to under 1.5 degrees centigrade. Without action by 2050 summer rainfall could fall by as much as 24% with downpours becoming more intense. Winter rainfall increase by as much as 16%², changes that will impact our well-being, the natural environment and the economy.
- 1.3 Addressing the complex and wide-ranging impact of a changing climate needs sustained investment and long-term planning but in 2021 the UK Climate Change Committee's Climate Change Risk Assessment³ was highly critical of progress across the UK.
- 1.4 Despite this Lewisham Council is committed to building a robust evidence-base on the flooding risks the borough faces and taking action to address them. This work is vital in keeping our most vulnerable residents and communities safe but also creates opportunities. Greening urban areas and recognising water as a precious resource can enrich local communities. Trees and green infrastructure can play a major part in slowing down and managing flows of water, while offering a wide range of other benefits from biodiversity, air quality, shading and are often a highly valued part of any local community.
- 1.5 The Government has given local authorities powers to manage local flood risk in a more coordinated way working in partnership with other relevant bodies at a national, regional and local level. Lewisham Council, as with other London Boroughs and single tier authorities across England is designated as a Lead Local Flood Authority (LLFA) with specific responsibilities relating to local flood risk from surface water runoff, groundwater and small rivers, streams and ditches.

¹ <https://www.lewisham.gov.uk>

² <https://www.theccc.org.uk>

³ <https://www.ukclimaterisk.org/>

- 1.6 The Flood and Water Management Act 2010 requires LLFAs such as Lewisham to develop and apply a Local Flood Risk Management Strategy that:
- Specifies the roles of the different organisations with responsibility for managing flood risk in Lewisham;
 - Describes how Lewisham is working with partners to reduce flood risk;
 - Provides an overall assessment of local flood risk;
 - Sets out the objectives for managing local flood risk; and
 - Outlines what actions are to be taken to meet those objectives.
- 1.7 Further information regarding the legislative context to local flood risk management and a more detailed description of the strategy requirements are provided in Appendix 1.
- 1.8 This Local Flood Risk Management Strategy builds on the work of the Council's 2015 strategy, and will set new objectives to manage local flood risk and tie in to the new National Flood Risk Strategy and Thames Water Drainage and Wastewater Management Plans.
- 1.9 The rise in extreme weather conditions, the presence of buildings in areas of flood risk, and significant constraints on public funding, mean that flood incidents cannot be prevented completely. The approach set out in this Flood Risk Management Strategy seeks to understand the risks the borough faces, bring investment in to reduce risk and work in partnership to ensure that the frequency and impact of flood events are reduced.

Historic flooding in Lewisham



Figure 1: Catford Bridge Station September 1968

- 1.10 A number of areas in London suffered during the Great Floods of September 1968 including the last major flood on the River Ravensbourne and its

tributaries when heavy rainfall within the catchment caused the river to burst its banks, creating widespread flooding of several hundred residential and commercial properties in the borough (figure 1 shows the depth of flooding at Catford Bridge Station).

- 1.11 Following the 1968 event the River Quaggy was enclosed in a concrete culvert. Less severe river flooding was also recorded in 1977, 1992, 1993, and 2013/2014 (although the latter not causing significant flooding within the borough compared to other reaches of the Ravensbourne and Quaggy).
- 1.12 In 1990 local residents opposed a plan to expand the defences in the area and pushed for the river to be released from its culvert and develop a series of moulded floodplains to create a more natural approach to flood risk management and better habitats for wildlife.
- 1.13 The Ravensbourne and in particular the Quaggy have benefited from flood alleviation measures to reduce this risk to the community from fluvial flooding such as Ladywell Fields, Cornmill Gardens in Lewisham Town Centre and the Sutcliffe Park Flood Storage Area scheme just across the borough boundary in Eltham . This is the approach we are trying to follow in developing and delivering the Local Strategy for Lewisham.
- 1.14 The Thames Barrier became operational in 1982. Since that time the Barrier was closed four times in the 1980s, 35 times in the 1990s, 75 times from 2000 to 2009 and 65 times between 2010 and March 2014. The Barrier was closed 50 times between September 2013 and July 2014 alone. Without the existence of the Thames Barrier, if extreme storms coincided with high tide, 115 square km of London could be flooded.

Roles and responsibilities

- 1.15 The London Borough of Lewisham Local Flood Risk Management Strategy sets out how Lewisham Council as the LLFA and partnership organisations work together to improve the management of local flood risk.
- 1.16 Lewisham Council works with several partners to reduce the risk and impact of flooding across the borough. The strategy sets out the responsibilities of these bodies so it is clear how the partnership will work together and so that local residents and businesses know what to expect of the different organisations involved. Risk Management Authorities, as defined by the Flood and Water Management Act 2010, include:
 - The Environment Agency – strategic overview role for all sources of flooding with specific responsibilities for flood and coastal erosion risk management activities on main rivers and the coast (this designation gives the Environment Agency powers to carry out works but not a duty to do so – maintenance and operation is the responsibility of the owner), regulating reservoir safety, and working in partnership with the Met Office to provide flood forecasts and warnings

- Thames Water – responsible for managing the risk of flooding from the public sewer network, both for surface water and foul;
- Highway Authorities – trunk roads in Lewisham are managed by Transport for London while the London Borough Lewisham Highways Team are responsible for the maintenance of all public roads, it is the responsibility of these agencies to ensure that flood risk affecting their networks is managed effectively
- Neighbouring LLFAs – these are the London Boroughs of Bexley, Bromley, Greenwich and Southwark; these authorities are responsible for the management of local flood risk within their areas; as flood water crosses councils' boundaries, and the impacts of flooding on residents, transport and other utilities can have a significant impact on surrounding areas, it is critical for neighbouring local authorities to work together to manage flood risk.

1.17 The following key partners are not formally defined as Risk Management Authorities but nevertheless play critical roles in the management of flood risk in Lewisham:

- Local community organisations – provide crucial local knowledge and public engagement on flooding and wider environmental issues, and with their network of volunteers help to deliver climate adaptation and carry out management of green-blue spaces;
- Rail Authorities – Network Rail and London Underground are responsible for managing critical transport infrastructure, it is the responsibility of these agencies to ensure that flood risk affecting their networks is managed effectively;
- Emergency Services – responsible for minimising the impact of extreme flood events and responding to emergency situations; and
- Utilities - responsible for provision and maintenance of utility infrastructure – electricity, gas telecommunications, etc and ensuring its resilience to flood risk.

1.18 A more comprehensive description of the roles and responsibilities of the various different authorities that manage flood risk in Lewisham can be found in Appendix 2.

1.19 Local residents and businesses also have a role to play in managing flood risk. People and properties that live in areas of high flood risk should be prepared for flood incidents (information on flood risk that properties face can be accessed [here](#)). Landowners whose properties are next to watercourses have a responsibility to ensure the unobstructed flow of water. It is also essential that local residents and businesses report any incidents of flooding of property, open spaces or roads. This helps to build up knowledge of flooding patterns, which then improves future risk management

Local context

- 1.20 The Local Flood Risk Management Strategy is one of several documents, plans, strategies and policies that influence how flood risk is managed in Lewisham; from national policy and guidance, through to local strategies and plans that set out how this will be applied locally.
- 1.21 Lewisham's Parks and Open Spaces Strategy highlights the priorities to preserve and enhance existing green spaces while delivering flood storage and through partnership working convert grey to blue-green infrastructure within highway active travel works.
- 1.22 Appendix 1 provides an overview of the interrelationship between various documents that deliver flood risk management objectives and an overview of the hierarchy of the national policy and guidance that influences them.
- 1.23 The Local Flood Risk Management Strategy is a strategic document, which sets out the overarching principles that dictate the approach taken to manage flood risk and outlines a broad range of objectives and actions to deliver these.

Development planning

- 1.24 Housing and other new development represents a potential increase in flood risk either from being in areas that are prone to flooding or by increasing the amount of water discharged from the site. This is managed through the planning application process, which is set out in the National Planning Policy Framework (NPPF) and other policy documents.
- 1.25 The Local Strategy does not set out the specific details of these policies or how they are managed. The strategy will include actions to monitor the implementation of these policies that affect local flood risk management and, if appropriate, identify new policies or implementation mechanisms that improve local flood risk management.

Assessment of local flood risk

- 1.26 A Flood is defined as inundation of water on land that is not normally covered by water. The combination of extensive man-made surfaces and under-lying impermeable geology in Lewisham mean that local rivers respond rapidly to rainfall and are liable to sudden flooding; these factors also increase the risk of surface water flooding.
- 1.27 The Ravensbourne River valley cuts through the centre of Lewisham and flows south to north from Bromley to the River Thames, the tributaries of the River Ravensbourne the River Quaggy, River Pool and Spring Brook all rise in or near the higher ground in the London Borough Bromley.

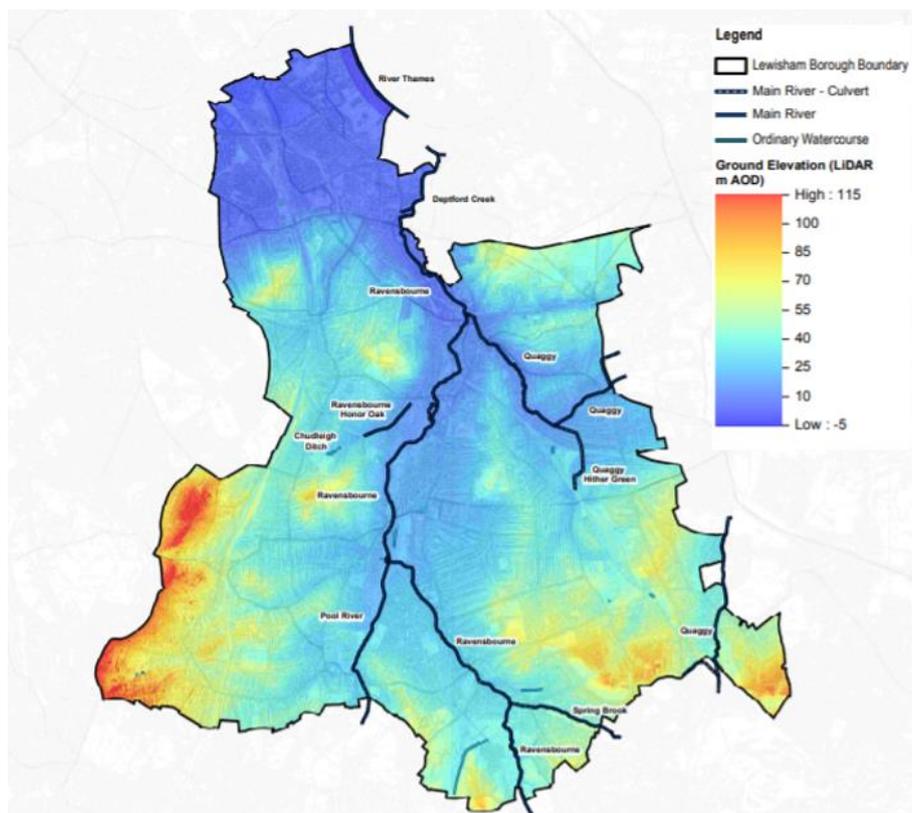


Figure 2: Topography of Lewisham

- 1.28 The number of properties at risk of flooding in Lewisham is high compared to other local authorities. This is mainly due to the geography and layout of the borough – most properties at risk of flooding are in the River Ravensbourne valley or fall within the Thames tidal breach zone.
- 1.29 Consequently, a wide range of flood defence systems are required to manage flooding and ensure that Lewisham’s residents and businesses are not faced with unacceptable risks or disruption. These defences include all aspects of the drainage networks from simple road gullies to large channelised rivers, floodwalls and flood storage areas.

Sources of flooding

- 1.30 Like many areas adjacent to the River Thames the communities to the north of the borough are at risk of tidal flooding from the River Thames estuary, particularly Evelyn and New Cross wards. The last time flooding from the River Thames estuary was recorded within the borough was in January 1928, when a storm surge tide overtopped the flood defences.
- 1.31 Other significant sources of flooding in Lewisham are main rivers and surface water. River flooding can be caused by rain falling far away from the location where flooding actually occurs. The rate of onset of flooding depends on the size and nature of the river catchment. For example, due to the urban nature

of the River Ravensbourne catchment and the location of the rainfall event the lead time for fluvial flooding within the Ravensbourne valley could be between 1 to 6 hours.

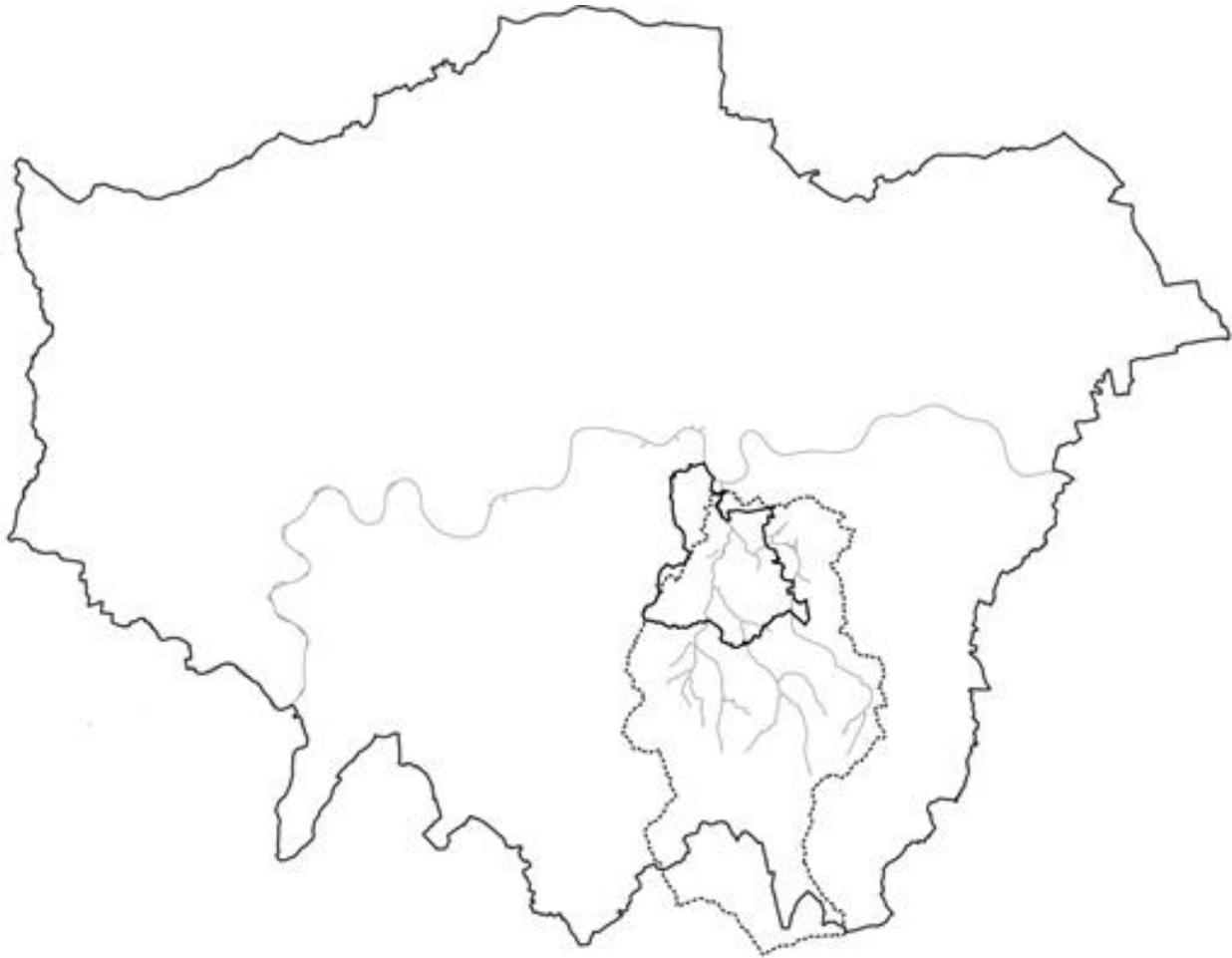


Figure 3: The catchment area of the River Ravensbourne (dotted line), with the boundaries of Lewisham and London superimposed (thick solid lines), the River Thames is also shown (thin solid line)

- 1.32 Surface water flooding occurs when intense rainfall generates runoff that overwhelms the drainage system leading to ponding and overland flows. Consequently surface water flooding can be highly localised and the onset of flooding is rapid.
- 1.33 Further sources of flooding include sewers, groundwater and flooding from ordinary watercourses, Table 1 below describes each type of flooding and the relevant risk management authority associated with each of them.

Flood Sources	Definition	Authority
Main Rivers (fluvial flooding)	Flooding caused by overtopping of banks or defences, main rivers are defined by the Environment Agency and are considered to be capable of causing significant flooding	Environment Agency
Tidal	Flooding from the sea or tidal rivers	Environment Agency
Groundwater	Water rises from the ground where permeable rock formations exist; although the bedrock of is London Clay, some of the borough is covered by permeable deposits such as sand and gravel	Lewisham Council
Ordinary Watercourses	Flooding caused by rivers, streams or ditches that are not classed as main rivers	Lewisham Council
Surface Water Runoff	Water that cannot enter the drainage system because it has been overwhelmed or blocked, leads to ponding and overland flows	Lewisham Council
Sewers	Water flows out of sewers due to blockages or lack of capacity	Thames Water
Reservoirs	Reservoir failure leads to sudden inundation of downstream areas (there are no statutory reservoirs in Lewisham)	Environment Agency

Table 1: Different types of flooding and relevant Risk Management Authorities

1.34 Although these flood types are managed separately, it is important to note that they are all inter-related – surface water drains into sewers, sewers and ordinary watercourses flow into main rivers, rivers flow in and out of reservoirs, and so on. Therefore management of the overall system must account for these various interactions.

Flood risk

1.35 Flood risk is a combination of the probability of flooding and the impact of flooding. The probability of flooding is commonly referred to using terms such as a 1 in 100 year flood event, this means that the probability of that flood occurring (or being exceeded) in a given year is 1 in 100 or 1%. This is a statistical expression that is used as a means of quantifying the degree of risk. It does not mean that flooding will only occur once every 100 years. If a flood

with an annual probability of 1 in 100 occurs in a particular year, it is just as likely to occur again the next year or even within the same year.

- 1.36 The impact of flooding is assessed in computer models by calculating the depth of flooding in a particular area; this can then be related to property damage or disruption to infrastructure allowing the overall consequences of potential flooding to be assessed.

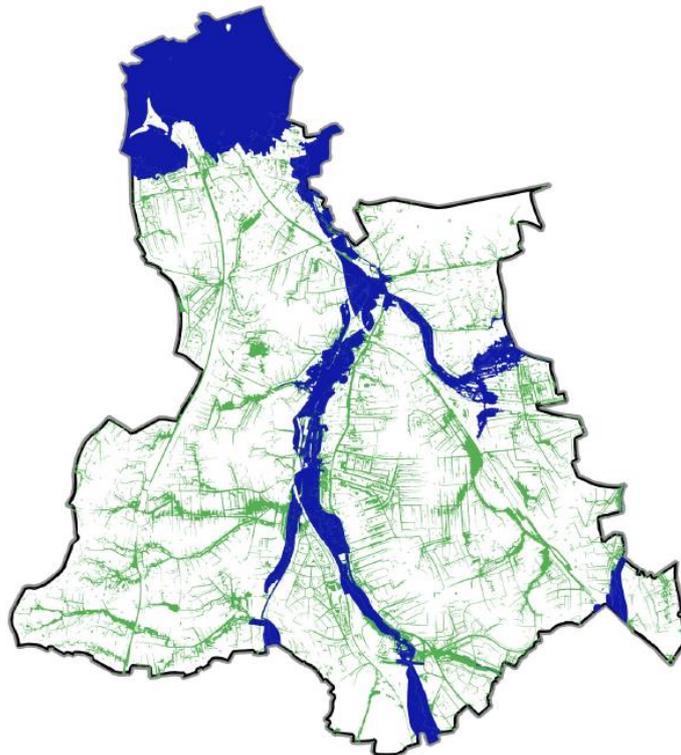


Figure 4: Risk of flooding from rivers (blue) and surface water (green) 0.1% annual exceedance probability

- 1.37 Figure 4 demonstrates the difference in spatial extent between fluvial and surface water flood risk in Lewisham. While fluvial flooding is generally restricted to fairly well defined river valleys and floodplains, surface water flooding is more widespread and is not confined to river valleys. The surface water flood map also represents the best available source of information for flood risk relating to ordinary watercourses, which in most cases have not been studied independently. It is important to note that these maps show the expected maximum extent of flooding for an event with an annual probability of 1 in 100. Within these areas there are varying degrees of risk – some areas are far more likely to flood than others and some areas will be subject to more severe flooding than other

2 Flood Risk Management

- 2.1 Existing drainage systems and other flood defences are under constant pressure due to processes such as climate change and urban creep – urban creep is the process whereby the impermeability of an urban area increases over time, due to modifications to individual properties. Continual maintenance and improvements of flood defences are required just to keep flood risk at existing levels.
- 2.2 Opportunities to reduce flood risk further are continually being sought. This is increasingly feasible because of the availability of new techniques such as computational hydraulic modelling. Applying these techniques as part of Lewisham’s Surface Water Management Plan has improved the understanding of flood risk across the borough. Several studies have recently been carried out in high-risk areas that look in detail at the interactions between rivers, surface water and sewers. This allows identification of the highest risk areas and provides tools to evaluate the most effective flood risk management measures.
- 2.3 If no action were taken to manage flood risk, increased flooding would occur and the consequences could be severe. The cost of this damage and disruption would outweigh the cost of continuing to manage flood risk. The cost effectiveness of flood risk management measures is tested by calculating the costs and benefits for the proposals. Only proposals that demonstrate a sufficiently high benefit to cost ratio are implemented.
- 2.4 The most effective types of measures are those that reduce runoff rates either by storing water in open spaces upstream of flood risk areas or by reducing the amount of impermeable surfacing which is the main generator of runoff in urban areas. Reducing runoff rates benefits all types of flood risk throughout the catchment whereas alternative measures such as constructing flood walls on rivers benefit only a specific area and can have negative impacts elsewhere.

Progress since the previous strategy

- 2.5 Lewisham Council published its previous Local Flood Risk Management Strategy in 2015. The strategy included 64 separate actions assessed against national, sub-regional and local objectives. A cost of each of the actions was estimated and they were prioritised as ‘Very High’; ‘High’; ‘Moderate’ and ‘Low’. The actions are wide ranging in nature, some specific and localised, while others are very general in nature. A key issue with the 2015 strategy is the very high costs of the actions, estimated at between £20m-£40m, which are unfunded and in the main not the responsibility of the Council.
- 2.6 A key focus of the previous strategy was to increase capacity and the evidence base to support delivery of the Lead Local Flood Authority function. This work has included:

- Identification and risk assessment of ordinary watercourses in the borough (2017) and delivery of remedial works on Lewisham land (2018);
- GIS mapping of flood incidents identified through calls to the Council's Access Point and reports by the Highway Inspectors' Team, triangulated against rainfall records, Environment Agency flood alerts and Thames Water data (2017);
- Commissioning consultants to provide technical assessments of planning applications for major developments (2017);
- Review of GIS mapping data against the priorities in the 2015 Strategy and identification of projects likely to attract external funding (2018);
- Review and prioritisation of Lewisham gully cleansing (2018);
- Development and submission of capital flood alleviation schemes 'Verdant Lane' and 'Beckenham Place Park' projects onto the Environment Agency Grant in Aid funding programme (2019);
- Creation and recruitment to a new Flood Risk Manager post within the Council (2019);
- Successful bid for funding from the Department of Environment Farming and Rural Affairs (DEFRA) for surface water modelling (2019);
- Updating the Multi Agency Flood Plan (2021);
- Completion of drainage works within Hither Green Cemetery to reduce the risk of flooding to the adjacent strategic railway track (2022);

2.7 The Council updated its Preliminary Flood Risk Assessment in 2017. The Preliminary Flood Risk Assessment is a requirement under the Flood Risk Regulations 2009 and provides a high level summary of flood risk from surface water, groundwater, sewers and ordinary watercourses and any interaction these have with main rivers.

2.8 A Strategic Flood Risk Assessment Level 1 and Level 2 as required under the National Planning Policy Framework was completed in 2019 and 2020 respectively to support the development of Lewisham's new draft Local Plan and move development away from the most vulnerable locations.

Understanding and predicting flooding

2.9 Climate change is likely to affect flood risk through sea level rise, more frequent and higher storm surges, increased winter rainfall, drier summers with periods of more intense summer rainfall. These effects are likely to result in increased frequency and magnitude of flooding in Lewisham. No climate model can give a single definite answer to what the future will look like, however, Climate Projections 2018 (UKCP18) predicts that winter rainfall could increase by around 20% by 2080 with greater intensity of rainfall increasing the risk of flooding⁴ (Table 2).

⁴ <https://www.metoffice.gov.uk/>

2.10 As such, there is clear need and demand to take proactive action to reduce current and future impacts of flooding. Local flood risk in particular is likely to be affected by climate change from:

- increasing rainfall intensities in the summer, leading to more intense rain storms and flash flooding of surface water and small ordinary watercourse;
- increased rainfall volumes in the winter leading to more fluvial flooding, including ordinary watercourses high levels on rivers can reduce the ability of ordinary watercourses and drainage networks to discharge; and
- increased rainfall can lead to significant groundwater recharge, which can cause groundwater flooding.

	Summer rainfall % change	Winter rainfall % change
1990-2025	-5.9	+10.3
2025-2050	-26.5	+8.9
2050-2080	-33.9	+19.7

Table 2: predicted changes in rainfall volume

2.11 Sea levels are predicted to rise with consequential increases in flood risk from the tidal Thames and we are reliant on Government investment and the work of the Environment Agency to ensure this risk is understood and matched by sufficient investment and action. The Environment Agency’s TE2100 plan is designed to do this with the Thames Barrier and any future replacement infrastructure there to provide protection alongside enhancements to local flood defences.

Wider benefits

2.12 Flood risk management is part of a wider environmental management and community support framework. Activities to manage the environment and support communities can have flood risk management benefits and flood risk management activities can have other environmental and societal benefits. Identifying opportunities to deliver other environmental and societal benefits is important in delivering any works as it helps to provide multiple benefits. It can also provide an opportunity for additional funding and support for the measures. Examples of areas that flood risk management work can provide other benefits include:

- Providing habitat to enhance the environment – planting trees, creating ponds and wetland features, and providing blue/green infrastructure to create habitat also reduces and manages runoff and contributes to flood risk management.
- Supporting communities to improve their resilience – many communities are at risk of flooding, which is a significant cause of

disruption, supporting them to manage this as a community can help to improve their resilience to flooding and climate change and lead to wider community actions.

- Improving local landscape character – many landscape features, such as trees, ponds, ditches, hedgerows, contribute to flood risk management, by supporting the maintenance and enhancement of landscape character flood risk can also be managed.

The Local Strategy will seek to identify opportunities to deliver multiple benefits through delivering blue green infrastructure.



Figure 5: River Ravensbourne at Cornmill Gardens

3 Principles, Objectives and KPI's

- 3.1 The core flood risk management principles set out our overarching approach to flood risk management, cutting across our objectives, helping us to determine our priorities, while ensuring that a consistent approach to project delivery of each action is taken.
- 3.2 The strategy objectives clearly present our ambitions for managing local flood risk, improving our understanding of risk and developing an evidence base that allows us to act to reduce flood risk; they enable us to ensure that development reduces the risk of flooding and that local residents and businesses are aware of the risk they face and empowered to act to reduce that risk.

Core Principles

- 3.3 Improve the borough's resilience to flooding and protect the most vulnerable:
- Understand and respond to the impact of a changing climate through a dynamic approach to flood risk management;
 - Target investment and planning on flood risk to support the borough's most vulnerable individuals and communities;
 - Support decision-making across the Council that ensures future development across Lewisham reduces flood risk.
- 3.4 Take an evidenced-based approach when assessing investment needs and prioritising project delivery:
- Use flood risk data and modelling to understand the risks of river, surface water and groundwater flooding;
 - Identify flood infrastructure in the borough and understand their condition and potential impact on flood risk;
 - Ensure the Council takes a strategic approach to flooding through its work as a Lead Local Flood Authority, Highways Authority, Planning Authority and in the service delivery of relevant Council functions.
- 3.5 Work in partnership to deliver multiple benefits through coordinated action:
- Deliver projects collaboratively with Risk Management Authorities locally, subregionally and across London securing partnership funding to achieve cost effective solutions with a range of benefits;
 - Cooperate with internal stakeholders and service teams to ensure that SuDS (sustainable drainage systems) are integrated into other programmes of works;
 - Integrate adaptation and investment in green infrastructure as part of Lewisham's response to the Climate Emergency promoting a natural and healthy environment for the benefit of residents and wildlife.

Objectives

- 3.6 The following objectives for managing local flood risk aim to reduce the risk and impact of flooding on the borough. The objectives for this strategy reflect the need to progress with the improvements achieved to date and to address the future challenges that face Lewisham.
- 3.7 Local Flood Risk Management Strategy Objectives:
1. **Understanding Risk and opportunity** – Risk Management Authorities in Lewisham have a clear understanding of local flood risk and management opportunities and this understanding is shared with partners to create an evidence base for the management of flood risk which enables Lewisham to target resources where they are most effective
 2. **Reducing the Risk of Flooding** – Protect the people and businesses of Lewisham from flooding through investment in flood risk management projects and programmes using new or innovative techniques where appropriate
 3. **Resilient Planning** – Development and spatial planning in Lewisham takes account of flood risk issues, reduces the causes of flooding and plans to effectively manage any impacts and through the re-development of previously developed land, reduces overall flood risk.
 4. **Resilient Communities** – Residents and businesses of Lewisham have access to appropriate data and information to understand flood risk in their area, how it is managed and by who. Communities are empowered to act to protect themselves from flooding through individual efforts, partnerships and joint working

Objective 1 – Understanding risk and opportunity

Risk Management Authorities in Lewisham have a clear understanding of local flood risk and management opportunities and this understanding is shared with partners to create an evidence base for the management of flood risk which enables Lewisham to target resources where they are most effective.

Flood Modelling

- 3.8 The Environment Agency's Risk of Flooding from Surface Water (RoFSW) currently represents the best information available on surface water flood risk across the borough.
- 3.9 The Environment Agency's RoFSW models overland flows on the surface that result from extreme rainfall events but it does not explicitly model the underground drainage system – it accounts for this by 'losing' a certain amount of water below ground. In general this works well as in most cases fairly reliable assumptions can be made regarding the drainage system. However, it does not work well in certain cases, particularly where flood alleviation schemes have previously been implemented in response to known flood problems or where interaction with rivers plays a key role.
- 3.10 Consequently, Lewisham Council have carried a series of detailed modelling studies looking at high-risk areas that explicitly model the interactions between above and below ground drainage systems including main rivers, ordinary watercourses, sewers and surface water.
- 3.11 The results of these studies will be used to update future versions of the Environment Agency's national surface water mapping. This will then be adopted as the standard surface water flood map and be published on the Council website and on the Environment Agency website under 'Risk of Flooding from Surface Water'.

Flood Incidents

- 3.12 The Council seeks to collect and record detailed information when flood incidents occur. Flooding in this context is defined as an inundation by water that causes damage to property or disruption to services. Recording flood incidents enhances understanding of flood risk and can be used to validate and improve models, as well as providing first hand evidence of flooding. Lewisham record flood incident information on a database. Members of the public can report flood incidents to the Council using the following methods:
- Website – <https://lewisham.gov.uk/myservices/roads-and-transport/roads-and-pavements/flooding-and-leaks>
 - Email – flooding@lewisham.gov.uk

Surface Water Management Plan

3.13 Lewisham published its Surface Water Management Plan in 2008, it outlines the preferred surface water management strategy in a given location. As the information relating to surface water flooding has improved significantly in recent years it is recommended that the SWMP be updated. It is vital to establish a long-term action plan that is based on the most up to date information available to manage surface water.

Sustainable Drainage Opportunities

3.14 The Council as a landowner manages parks and open spaces, corporate buildings, housing, car parks, schools and highway infrastructure sustainable drainage measures could be used within all of those spaces to manage surface water and provide additional benefit to the landowner. It is crucial to understand the most effective locations to retrofit sustainable drainage measures.

Asset Management

3.15 Maintenance of flood risk management assets is the responsibility of the asset owner. A large number of such assets are on or under the highway network.

3.16 Routine maintenance includes day-to-day activities such as cleaning highway gullies and removing litter and other detritus from the streets. These actions help to ensure that important features of the drainage network such as gullies, pipes and grilles are less likely to become blocked and thereby lead to flooding.

3.17 Lewisham Council considers any asset that has the potential to cause flooding through individual failure to be significant. Therefore large assets such as culverted watercourses, raised flood defences, flood storage areas and underground tanks are considered to be significant whereas individual highway gullies are not. Lewisham LLFA maintain the flood risk management asset register.

Key Performance Indicators

Objective 1 – Understanding risk and opportunity	
KPIs	<ol style="list-style-type: none">1. Number of flood incidents recorded2. Spend on remediation work to enhance flood risk management assets

Objective 2 – Reducing the risk of flooding

Protect the people and businesses of Lewisham from flooding through investment in flood risk management projects and programmes using new or innovative techniques where appropriate.

Retrofitting Sustainable Drainage

3.18 To maximise the multiple benefits of sustainable drainage in existing communities it is essential to identify and implement opportunities to retrofit SuDS. There are many situations where such measures can be carried out cost effectively, for example:

- Regeneration projects – projects to enhance public spaces create opportunities to improve drainage by implementing multi-functional measures such as rain gardens and permeable paving
- Footway schemes – works on the footway often provide opportunities to implement SuDS, for example by converting conventional highway verges and planted areas, which are usually raised, to rain gardens which are shallow depressed areas of vegetation that can accept, store and drain rainwater runoff; opportunities to install permeable paving should also be exploited both on footways and carriageways however such schemes can be limited by existing constraints such as buried services and the high cost of full re-construction
- Tree planting – planting street trees into SuDS trees pits help to store surface water, reducing the risk of localised surface water on the highway. SuDS trees pits help to reduce water stress in dry periods and the likelihood of tree roots protruding toward the surface.
- Traffic calming schemes – works that involve restricting traffic in some way to promote safety measures can often be combined with SuDS implementation at minimal additional cost
- Car parks – these often have potential to be converted to store shallow depths of flood water during extreme flood events without significantly affecting their serviceability; for example creating a 100mm high kerb or bund around a fairly flat car park whilst leaving the conventional drainage system intact can store relatively large volumes of water at low cost; such schemes can be enhanced further by replacing the conventional drainage systems with additional SuDS features
- Refurbishment of large estates – large sites such as hospitals, business and industrial areas implement routinely carry out refurbishment and renewal works, such schemes create opportunities to implement SuDS
- Schools – present a number of opportunities for SuDS, which can be used to enhance the school landscape design and provide a range of educational and play opportunities. Schools typically have significant external spaces, both hard and soft landscaped, which are ideal for

retrofitting sustainable drainage features. An additional benefit of delivering SuDS in schools is the opportunity to integrate the measures with the school curriculum and thereby provide first-hand educational opportunities.

- Parks and open spaces - creating flood storage areas in parks and open spaces often involves restoring natural floodplains and constructing wetlands, through careful design such areas can be used to maximise storage during extreme flood events while remaining serviceable for day-to-day use.

Flood Alleviation Schemes

- 3.19 Risk management authorities can construct flood storage areas, flood defences, or other works to reduce the risk of flooding to an area. The optimum design and its cost effectiveness would normally be confirmed through hydraulic modelling. If modelling shows that no suitable option can be identified, then other steps such as individual property protection measures will be considered to manage the risk.

Natural Flood Management & Nature-based Solutions

- 3.20 The area of mostly permeable land adjacent to the railway line that runs from Grove Park Station to the South Circular provides vital natural flood resilience which helps to reduce the risk of flooding to critical infrastructure (verdant lane/south circular junction and the strategic railway line) downstream.
- 3.21 The creation of a district park in this location provides an opportunity to enhance and adapt the landscape using Nature-based solutions; the adapted landscape could attenuate a greater amount of rainwater and provide greater flood risk benefit in times of deluge, retaining peak storm flows in natural features which will help to boost local biodiversity.
- 3.22 The Council working with the Baring Trust and other local partners aims to protect and improve flood mitigation benefit of permeable natural sites across the borough by introducing Natural Flood Management techniques such as wetland restoration, using woody debris to slow flows and tree planting.

Water Framework Directive

- 3.23 The Water Framework Directive requires local authorities and other stakeholders to take actions to improve the status of water bodies based on a wide range of measures including biological and chemical indicators. Most of the rivers in Lewisham are classed as 'heavily modified' due to the extent of urbanisation and associated modifications to watercourses in the borough.
- 3.24 Poor water quality caused by urban pollution is a serious and widespread issue afflicting Lewisham's rivers. As well as causing loss of wildlife, unsightly polluted watercourses and unpleasant odours can blight nearby areas and in

some cases affect the health and well-being of local residents. Sources of pollution include highway runoff, industrial areas and litter. A major pollution source that is very challenging to control is misconnected sewers. These often involve small DIY installations such as kitchen sinks and washing machines that are 'misconnected' to the wrong sewer outfall, the result is that the effluent from these devices is delivered straight to the nearest river instead of going to the sewage treatment works.

- 3.25 Lewisham Council work with Thames Water to identify and rectify misconnections; however, it is not possible to identify and eliminate all misconnected properties. In some areas wetlands planted with reeds can be used to mitigate the impacts of residual pollution and contribute to meeting Water Framework Directive objectives.
- 3.26 The Council aims to maximise opportunities to restore or enhance water features and achieve the following key benefits for all flood alleviation schemes under consideration:
- Reduce flood risk
 - Improve water quality
 - Enhance amenity value for local residents
 - Create or improve wildlife habitats
 - Protect or restore river corridors by naturalising heavily modified watercourses where opportunities exist

Thames Estuary 2100

- 3.27 Tackling flood risk requires local and regional action. The Thames Estuary 2100 Plan identifies the need to raise flood defences in central London by 0.5m by 2065 and by 1 m by 2100, to provide protection up to a 1:10,000-year standard. These dates may need to be brought forward if sea level rise accelerates.
- 3.28 The Environment Agency's Thames Estuary 2100 Plan requires flood defence raising in Lewisham alongside replacement of the Thames barrier to provide continued protection. The Council will facilitate plans to raise flood defences on the borough's riverside to protect Lewisham against higher tides.

Key Performance Indicators

Objective 2 – Reduce the risk of flooding	
KPIs	<ol style="list-style-type: none"> 1. Number of properties and businesses that have reduced risk of flooding as a result of flood mitigation projects and SuDS 2. Additional storage of flood water in the public realm 3. Spend on delivery of flood risk management projects 4. Area of hardstanding surfaces disconnected from the drainage system 5. Length of river restored through river restoration activities 6. Number SuDS tree pits planted
Targets for 2027	<ol style="list-style-type: none"> 1. 1000 properties with a reduce risk of flooding 2. 25,000m³ of addition flood storage in the public realm 3. 2000m² of impermeable surface disconnected from the public sewers

Objective 3 – Resilient Planning

Development and spatial planning in Lewisham takes account of flood risk issues, reduces the causes of flooding and plans to effectively manage any impacts and through the re-development of previously developed land, reduces overall flood risk.

Sustainable Drainage

- 3.29 New developments, particularly the re-development of brownfield sites, provide opportunities to reduce overall flood risk, through the use of Sustainable Drainage Systems (SuDS) and by allowing space for flood storage and overland flows.
- 3.30 Lewisham’s Local Plan includes policies that require all new developments to maximise the use of SuDS and restrict surface water runoff rates to greenfield rates where possible. These systems include measures such as green roofs, permeable paving and rainwater harvesting that mimic natural drainage systems by increasing storage and infiltration, and slowing down the rate of runoff. This reduces the rate and volume of surface water runoff and therefore the risk of flooding further downstream.
- 3.31 To ensure the potential multiple benefits of SuDS are realised, it is recommended that above ground, green infrastructure SuDS (such as swales, rain gardens and wetland features) are preferred to below ground measures such as underground storage tanks. Green infrastructure SuDS deliver wider benefits than below ground systems which provide flood storage benefits but little else. As well as enhancing the aesthetic value of our surroundings, green infrastructure SuDS can contribute to improving air quality and well-being. Above ground systems are also easier to inspect and maintain and are therefore less prone to failure.
- 3.32 This recommendation aligns with the drainage hierarchy in the London Plan which requires above ground systems to be considered first. It also addresses requirements in paragraphs 109 and 114 of the National Planning Policy Framework to recognise the wider benefits of ecosystem services and plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Lewisham have developed a Lewisham SuDS Guide that provides further information regarding the use of SuDS with specific reference to Lewisham’s urban character and local geographical conditions.

Safe Development

- 3.33 To be classed as safe any development in or near flood risk areas must:
- Provide a dry access route above the 100 year plus climate change flood level or, where appropriate modelled data exists, an access route within the low hazard area of the floodplain (as defined by the Environment Agency’s Flood Risk Assessment Guidance for New Development R&D Technical Report FD2320) to and from any residential development should be provided;
 - Finished floor levels should be set at least 300mm above the 100 year plus climate change flood level; to achieve this without increasing flood risk elsewhere, it must be shown that there will be no net loss of flood storage and that overland flow routes will not be obstructed;
 - For surface water flooding, a 100mm freeboard instead of 300mm may be considered.
- 3.34 The National Planning Policy Framework contain policies that avoid locating vulnerable uses, such as basement dwellings or essential infrastructure, in areas that are at risk of flooding.

Key Performance Indicators

Objective 3 – Resilient Planning	
KPIs	<ol style="list-style-type: none"> 1. Number of minor developers that have implemented SuDS measures 2. Percentage of major development that attenuates to greenfield runoff rate for a 1 in 100 year + climate change rainfall event

Objective 4 – Resilient communities

Residents and businesses of Lewisham have access to appropriate data and information to understand flood risk in their area, how it is managed and by who. Communities are empowered to act to protect themselves from flooding through individual efforts, partnerships and joint working.

Preparedness

- 3.35 It is vital to recognise that even with a wide range of flood defences in place, residual flood risk will still exist; this is due primarily to two factors:
- Exceedance events – extreme storms can occur that exceed the design standards of the flood defences;
 - Structural failure – flood defences have the potential to fail either through blockages or structural collapse, such failures are often associated with inadequate maintenance;
 - Technical unfeasibility – with the impact of climate change it may not be uneconomically viable to defend all areas at risk of flooding.

In areas where significant residual flood risk remains it is important that communities and businesses are adequately prepared.

Flood resilience

- 3.36 Where residual flood risk remains and no other suitable flood risk reduction measures can be identified, individual property protection measures can be used as a last resort to minimise the potential consequences of flooding. For shallow flooding depths a water exclusion policy may sometimes be appropriate using flood gates across doorways or air brick covers.
- 3.37 Flood resilience measures allow water to enter properties but aim to reduce the damage caused when it does. Examples of flood resilient design measures include raising electrical circuits and other services, and using waterproof floor and wall coverings such as tiles or concrete rather than timber or plaster. Such properties may need to be evacuated temporarily during flood events but can be re-entered relatively quickly. Conventional properties that experience flooding can require many months, and large financial sums, to be returned to their pre-flood condition. These measures are not ideal; however, they can significantly reduce the costs and disruption caused by flooding

Flood Insurance

- 3.38 Property insurance claims for flood damage across the UK have increased significantly over recent years and are likely to increase further due to the impacts of climate change. Since 2000, flood insurers have been providing

cover under a 'Statement of Principles' agreement with the Government, which ensures that flood insurance is available to householders and small and medium sized enterprises (SMEs). Large commercial properties are not covered by the Statement of Principles and therefore need to arrange for flood risk insurance at market rates.

- 3.39 The Government and the insurance industry made an agreement in 2013 to take forward the Flood Reinsurance Scheme (Flood Re) as the preferred approach to addressing the availability and affordability of flood insurance. The Flood Re scheme is a not-for-profit flood reinsurance fund, owned and managed by the insurance industry, and established to ensure that those domestic properties in the UK at the highest risk of flooding can receive affordable cover for the flood element of their household property insurance.

Multi-Agency Flood Plan

- 3.40 Lewisham Council aims to take action before, during and after flooding in order to mitigate the effects of any extreme rainfall or fluvial flood events. The procedures to be followed are set out in detail in the Multi-Agency Flood Plan. This document was prepared by Lewisham's Emergency Planning Team in partnership with a number of external agencies including the Metropolitan Police, the London Fire Brigade and the Environment Agency. It includes a risk assessment for critical infrastructure across the borough, this ensures that the risks are well understood and can be managed accordingly.
- 3.41 Council officers in the Emergency Planning, Green Scene, Highways and Corporate Assets teams monitor Flood Guidance Statements issued by the Flood Forecasting Centre and the Environment Agency's Flood Alerts and Warnings – the latter are based primarily on river levels rather than surface water flood risk.

Partnership working

- 3.42 Flooding does not stay within local authority boundaries, it is therefore essential that LLFAs work in partnership with neighbouring authorities, the Ravensbourne Catchment Group and with a range of agencies to create a comprehensive understanding of flood risk and determine a suitable plan of actions to manage that risk.
- 3.43 The Flood and Water Management Act group which include representatives from Lewisham's Green Scene, Emergency Planning, Highways and Planning Policy teams meet to discuss ongoing activities and policy development. This provides an opportunity for officers from different departments that have responsibilities for flooding to share information and coordinate activities across the Council.

Key Performance Indicators

Objective 4 – Resilient Communities	
KPIs	<ol style="list-style-type: none"> 1. Number of residents engaged about flood risk management risk through events 2. Number of school children engaged about flood risk management 3. Number of volunteers that have agreed to assist with the maintenance of blue-green infrastructure
Target	<ol style="list-style-type: none"> 1. 1000 volunteers engaged specifically on maintenance of blue-green infrastructure by 2027 2. 600 school pupils engaged on the implementation of sustainable drainage and climate adaptation by 2027

4 Action Plan

- 4.1 As LLFA, Lewisham Council will take the lead role in implementing this strategy and coordinating activities with other risk management authorities to address flood risk across the borough. Lewisham will carry out many of the actions identified in the action plan using existing resources. Lewisham is allocated an annual budget for LLFA activities; the Highways, Climate Resilience Team, Planning, Emergency Planning and Green Scene teams carry out most of these. Some actions will require additional funding for staff resources, expert consultancy fees and direct project funding. A number of other external sources of funding and resources will be utilised where available:
- Funding can be obtained from Defra's Flood Defence Grant in Aid (FDGiA) and the Thames Regional Flood and Coastal Committee's local levy, both administered by the Environment Agency, for local flood risk investigations and for implementation of flood alleviation schemes that deliver suitable reductions in flood risk;
 - Thames Water can fund flood alleviation works on the sewer network where the appropriate criteria are fulfilled;
 - Utility companies and property owners are responsible for site specific flood risk alleviation, resistance and resilience of their premises;
 - Developers are required to ensure that flood risks are addressed and to implement SuDS as part of new developments, contributions to flood alleviation schemes can be achieved through Community Infrastructure Levy payments or Section 106 agreements.
- 4.2 The Action Plan covers the 4 objectives: understanding risk and opportunity, reducing the risk of flooding, resilient planning and resilient communities.
- 4.3 To support delivery and development of the Action Plan, each action has a reference number and an indication of the timeframe for delivery, the cost and the owner of the action. Given the scope of work, the complexity of many of the actions and the 5-year timeframe there are a wide range of variables involved. Changes to costs, resources, technology as well as variable nature of flood risk event will require changes to the Action Plan which will need to be regularly reviewed and updated.
- 4.4 Specific delivery dates have been used to highlight when the action will be completed. Actions shown as on-going display continuing programmes of work, where progress will be tracked by an associated KPIs

Objective 1 – Understanding risk and opportunity			
Ref	Action	Owner	Time-frame
1.01	Produce a database for planned council works in the public realm, parks and open spaces to maximise integration of flood adaptation in the Council wider programme of works	Inclusive regeneration	April 2023
1.02	Produce a shared SuDS Opportunities Register showing where flood storage could be incorporated into the public realm	Climate resilience team	April 2023
1.03	Record flood incidents and share data with partners to develop a picture of flood risk across the borough	LLFA	On-going
1.04	Maintain a register of significant flood risk management assets to ensure that the condition major assets is known	LLFA	On-going
1.05	Conduct a Surface Water Management Plan to identify options to manage flood risk to an acceptable level	Climate resilience team	March 2025
1.06	Identify ownership and condition of assets that fall under the Thames Estuary 2100 Plan	LLFA	March 2025
1.07	Conduct an asset and performance review of all highway drainage, culverts and flood risk management assets in Lewisham to help prioritise future asset management maintenance in the borough	Highways	On-going
1.08	Internal flooding group to review actions on a yearly basis and identify projects where flood mitigation can be integrated	LLFA	February 2023
1.09	Report Action Plan amendments to the Sustainable Development Select Scrutiny Committee	Climate resilience team	March 2023
Objective 2 – Reducing the risk of flooding			
Ref	Action	Owner	Time-frame
2.01	Conduct flood risk mitigation works on the flood storage area within Chinbrook Meadows to reduce the risk of fluvial flooding on the River Quaggy	Green scene	April 2023
2.02	Deliver a constructed wetlands within Chinbrook Meadows to reduce the risk of siltation of flood risk management assets within the park	Green scene	April 2023

Ref	Action	Owner	Time-frame
2.03	Integrate flood adaptation measures within Dalmain Primary School to reduce the risk of surface water flooding with the Carholme Road critical drainage area	Climate resilience team	September 2022
2.04	Integrate flood adaptation measures within Rathfern Primary School to reduce the risk of surface water flooding with the Carholme Road critical drainage area	Climate resilience team	September 2023
2.05	Construct SuDS tree pits within areas of high surface water flood risk to reduce the likely of localised highway flooding	Climate resilience team	On-going
2.06	Carry out programme of community river restoration activities on the River Ravensbourne, River Pool and River Quaggy to reduce the likelihood of fluvial flooding.	Green scene	On-going
2.07	Plant trees within the public realm, parks and open spaces in critical drainage areas to intercept rainfall and reduce surface water runoff	Green scene	On-going
2.08	Reduce the risk of flooding along the Ravensbourne by creating flood storage in Beckenham Place Park as part of the wider investment in the eastern side of the park	Capital delivery team	December 2023
2.09	Complete a business case for delivering a constructed wetlands within Sydenham Wells Park to reduce the risk of surface water flooding within the Upper Sydenham critical drainage area	Climate resilience team	December 2026
2.10	Complete a business case for delivering a capital flood alleviation scheme at Verdant Lane to reduce the risk of surface water flooding to properties and infrastructure on the Verdant Lane and Brownhill Road	Climate resilience team	December 2026
2.11	Identify opportunities at natural permeable sites across the borough where Nature-based solutions can be implement to reduce the risk of flooding	Climate resilience team	On-going
2.12	Work with partners to develop a masterplan for the Grove Park District Park that identifies areas where nature-based flood risk attenuation can be implemented	LLFA	March 2023

Objective 3 – Resilient Planning			
Ref	Action	Owner	Time-frame
3.01	Produce procedural and guidance documents to enable planning officers to assess sustainable drainage strategies within minor applications to maximise the flood attenuation within new development	Climate resilience team	December 2022
3.02	Update Planning Validation maps to ensure Ordinary Watercourses are identified as planning constraints	Planning validation team	December 2022
3.03	Deliver programme of SuDS training to planning and planning policy officers to ensure that SuDS and flooding benefit is maximised through the development process	Climate resilience team	On-going
3.04	Ensure that (where feasible) all development within critical drainage areas will attenuate to greenfield runoff rates	LLFA	On-going
3.05	New development will contribute over 5000m ² of new blue green infrastructure in the public realm	Climate resilience team	March 2024
3.06	Review opportunities to update planning policy including the Rivers Corridors Improvement SPD to give a greater focus on Ordinary Watercourses	Planning	March 2024
3.07	Review local planning policy in the context of The Environment Bill and other changes to national policy to create opportunities to use offsite contributions for the delivery of blue green interventions within the public realm where developments are not able to do so onsite.	Planning	March 2023

Objective 4 – Resilient communities			
Ref	Action	Owner	Time-frame
4.01	Produce interpretive installations near watercourses that increase public knowledge on risk of flooding within Lewisham	Climate resilience team	December 2022
4.02	Provide information and guidance on small-scale SuDS features and depaving to empower residents to retrofit their properties	Climate resilience team	December 2022
4.03	Create online content to inform residents and landowners of the level of flood risk that they face and the steps they can take to increase resilience	LLFA	December 2022
4.04	Conduct a flood preparedness study which will outline the level of flood risk properties face	Climate resilience team	March 2026
4.05	Review and update the Multi Agency Flood Plan for the borough and hold a repeat local exercise with first responders, council services and others.	LLFA	March 2024

Glossary

Climate change Long-term variations in global temperature and weather patterns, recent predictions suggest that climate change will lead to an increase in the frequency and intensity of storms that cause river and surface water flooding

Depave The replacement of impermeable hardstanding surfaces with permeable soft surfaces

Ecosystem services The benefits people obtain from ecosystems such as food, water, flood control and recreation

Flooding Inundation by water that causes damage to property or disruption to services

Green infrastructure A network of multi-functional green space capable of delivering a wide range of environmental and quality of life benefits

Greenfield runoff rate The rate of runoff that would occur from a site in its undeveloped (and therefore undisturbed) state

Groundwater Water in the saturated zone of the ground below the water table, prolonged wet periods cause the water table to rise which can lead to water seeping out of the ground unexpectedly

Main rivers A watercourse designated on a statutory map maintained by Defra

Natural Flood Management The alteration, restoration or use of landscaped features to slow runoff rates and reduce flood risk downstream

Ordinary watercourses A watercourse that is not a designated main river, a private drain or a public sewer

Rain Garden Small planted detention basins that are designed to temporarily store rainfall runoff and increase infiltration, they can be planted with a wide variety of vegetation capable of tolerating wet and dry conditions

Sustainable drainage system A sequence of management practices and control features that are designed to drain surface water in a more sustainable manner than conventional techniques by increasing storage and infiltration, and slowing down the rate of runoff

Urban creep The process whereby the impermeability of the urban area increases over time, mainly due to modifications to individual properties

Nature-based Solutions Actions to protect, sustainably manage, and restore natural or modified ecosystems, that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits.

List of Abbreviations and acronyms

LLFA	Lead Local Flood Authority
LFRMS	Local Flood Risk Management Strategy
SWMP	Surface Water Management Plan
SuDS	Sustainable Drainage
EA	Environment Agency
SFRA	Strategic Flood Risk Assessment
NGO	Non-governmental Organisation
GIS	Geographical Information System
FDGiA	Flood Defence Grant in Aid
S106	Section 106
CIL	Community Infrastructure Levy

References

1. The Flood and Water Management Act, The Stationery Office Ltd, April 2010
2. Strategic Flood Risk Assessment, London Borough of Lewisham, October 2018
3. Preliminary Flood Risk Assessment, London Borough of Lewisham, May 2017
4. Surface Water Management Plan, London Borough of Lewisham, April 2011
6. National Planning Policy Framework, DCLG, March 2012
7. The London Plan, Greater London Authority, March 2021
9. Local Plan, London Borough of Lewisham
10. Multi Agency Flood Plan, London Borough of Lewisham, March 2021
11. The Flood Risk Regulations 2009, The Stationery Office Ltd, December 2009
12. Progress in adapting to climate change, Climate Change Committee, June 2021

Appendix 1 – Legislative and strategic context

Legislative context

Pitt review

The extreme flooding that occurred during the summer of 2007 highlighted the lack of effective management of local flood risk in the UK. This led to publication of the Pitt Review ‘Learning Lessons from the 2007 Floods’ in December 2008. This report identified that much of the flooding was caused by local sources, such as surface water, rather than river or coastal flooding which have traditionally been the focus of strategic flood risk planning. The review recommended giving local authorities responsibility for coordinating measures to minimise flood risk in their areas.

Flood Risk Regulations 2009

These regulations designate local authorities, such as Lewisham, as Lead Local Flood Authorities with new duties including the requirement to:

- Prepare a preliminary flood risk assessment by June 2011, for publication by the Environment Agency in December 2011, showing the probability of flooding and consequences for human health, the environment, cultural heritage and economic activity
- Prepare flood risk maps and flood hazard maps by June 2013, for publication by the Environment Agency in December 2013
- Prepare a flood risk management plan for areas which are at significant risk of flooding by June 2015, for publication by the environment Agency in December 2015

Flood and Water Management Act 2010

This Act gives Lead Local Flood Authorities the following responsibilities relating the management of local flood risk:

- Develop, maintain, apply and monitor a strategy for local flood risk management in its area, the strategy must specify:
 - The risk management authorities in the authority’s area
 - The flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area
 - The objectives for managing local flood risk
 - The measures proposed to achieve those objectives
 - How and when the measures are expected to be implemented
 - The costs and benefits of those measures, and how they are to be paid for
 - The assessment of local flood risk for the purpose of the strategy
 - How and when the Strategy is to be reviewed

- How the strategy contributes to the achievement of wider environmental objective
- Investigate flooding incidents and report on the findings
- Establish and maintain a register of structures or features which, in the opinion of the authority, are likely to have a significant effect on flood risk in its area, and a record of information about each of those structures or features, including information about ownership and state of repair
- Aim to make a contribution towards the achievement of sustainable development in the discharge of its flood risk duties
- Designate structures or features that affect flooding as designated flood defences which cannot then be altered without consent

Civil Contingencies Act 2004

Local authorities have 7 duties under the Civil Contingencies Act 2004:

- To operate with other local responders to enhance coordination and efficiency
- Ensure information is shared with local responders to enhance coordination
- Carry out risk assessments
- Have emergency plans in place
- Have business continuity management arrangements in place
- Have arrangements in place to warn and inform the public in the event of an Emergency
- Provide advice and assistance to businesses and voluntary organisations regarding business continuity management

Multi Agency Flood Plan

This document describes the roles of the different organisations involved in planning for and responding to severe flood incidents.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was introduced in 2012 and provides Government guidance on planning. It includes national flood risk policies that describe how flood risk is managed in relation to new development.

Local Plan

The draft Local Plan for Lewisham sets out the vision for shaping the borough and contains the policies by which planning decisions will be made. These include policies that set out Lewisham's approach to managing local flood risk from new development – avoiding inappropriate development in flood risk areas, ensuring that new development is safe from flooding and does not increase flood risk outside of the development site by increasing runoff or displacing flood water.

Appendix 2 – Flood Risk Management Authorities

The table below describes the functions and responsibilities of the Risk Management Authorities that operate in Lewisham, as defined by the Flood and Water Management Act 2010.

Authority	Function	Responsibilities
Lewisham Council	LLFA	Strategic role in overseeing the management of local flood risk including responsibility for: <ul style="list-style-type: none"> • Preparing and applying a Local Flood Risk Management Strategy • Investigating flood incidents • Maintaining a register of flood risk management assets • Designating appropriate flood assets
Lewisham Council	Local Planning Authority	Ensuring that new development is safe from flooding and does not increase flood risk elsewhere
Lewisham Council	Highways Authority	Duty to maintain the highway including responsibility for drain and gully maintenance on non-strategic roads
Lewisham Council	Category 1 responder	Ensuring that systems and processes are in place to provide emergency response to flooding
Lewisham Council	Green Scene	Duty to maintain flood risk management assets within Lewisham parks and open spaces
Environment Agency	Strategic roles	National strategic responsibility for overseeing flood risk actions with regard to the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010
Environment Agency	Operational role	Responsible for overseeing maintenance of flood defences such as the River Lee Flood Relief Channel Management of flooding from reservoirs, main rivers and the sea Advisory Emergency Planning role in assessment of Multi Agency Flood Plans Advisory Planning role in assessment of flood risk associated with planning policy and development
Thames Water	Sewerage undertaker	Responsible for provision and maintenance of the sewer network Upgrade of sewer network to facilitate increased drainage capacity requirements

Authority	Function	Responsibilities
Transport for London	Transport infrastructure provider	Responsible for provision and maintenance of strategic road network and London Underground and bus networks ensuring their resilience to flood risk
Neighbouring boroughs	LLFAs	Strategic role in overseeing the management of local flood risk in their areas and liaison with other LLFAs affected

The following key partners are not formally defined as Risk Management Authorities but nevertheless play critical roles in the management of flood risk in Lewisham.

Authority	Function	Responsibilities
Network Rail	Transport infrastructure providers	Responsible for provision and maintenance of railway network and their resilience to flood risk
Greater London Authority	Drain London	Facilitation of co-ordinated working on flood risk across London including provision of guidance and information
Business and residents	Property owners	Responsible for flood resistance and resilience, and emergency and contingency planning associated with properties
Utility companies	Utility providers	Responsible for provision and maintenance of utility infrastructure – electricity, gas telecommunications, etc and ensuring its resilience to flood risk
Emergency Services	Emergency response	Responsible for minimising the impact of extreme flood events and responding to emergency situations

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Sustainable Development Select Committee

Report title: LBL Air Quality Action Plan (AQAP) 2022-2027

Date: 27 June 2022

Key decision: No.

Class: Part 1

Ward(s) affected: All

Contributors: Jennifer Daothong, Executive Director for Housing, Regeneration and Public Realm; Tom Brown, Executive Director for Community Services; Zahur Khan, Director of Public Realm; David Edwards, Head of Environmental Health; Dr Catherine Mbema, Director of Public Health; Dr Eliane S Foteu Madio, Environmental Protection Manager; Aslam Baig, Public Health Strategist, Health Protection

Outline and recommendations

- The London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP sets out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027. Schedule 11 of the Environment Act 1995 requires local authorities to consult on their AQAP with a range of persons and organisations. The final reviewed AQAP following consultation is appended to this report.
- Public consultation for the AQAP was undertaken between 1 September 2021 and 6 October 2021, which presented actions developed within seven broad themes proposed to reduce air pollution in Lewisham. The seven themes in order of priority are as follows:
 1. **Monitoring and other core statutory duties:** Maintenance of monitoring networks is critical to understand where pollution is most acute in Lewisham and to assess which measures are most effective to reduce pollution. This is one of a number of statutory duties.
 2. **Emissions from developments and buildings:** Emissions from buildings account for about 15% of the NO_x emissions across London and are important in affecting NO₂ concentrations.
 3. **Public health and awareness raising:** Increasing awareness can drive behavioural change to lower emissions as well as reducing exposure to air pollution.
 4. **Delivery servicing and freight:** Vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions.
 5. **Borough fleet actions:** Our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO₂ emissions. Addressing our own fleet means we will be leading by example.
 6. **Localised solutions:** These seek to improve the environment of neighbourhoods through a combination of measures.
 7. **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 cars) as far as possible.

It is recommended that the Sustainable Development Select Committee:

- Note the AQAP consultation report.
- Note the new World Health Organization (WHO) air quality guidelines for PM_{2.5}.
- Review and comment on the final AQAP 2022-27.

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Timeline of engagement and decision-making

- **LBL Internal meetings:** consultation with internal stakeholders and the AQ working group took place between November 2020 and January 2022
- **Statutory and Public consultation:** 1 September 2021 to 6 October 2021 – 6 weeks
- **Lewisham Health Protection Committee:** AQAP Consultation Briefing - 20 July 2021
- **Sustainable Development Select Committee:** AQAP Consultation Briefing - 25 November 2021
- **Mayor of London Greater London Authority approval:** 11 February 2022
- **Lewisham Health Protection Committee:** Final AQAP briefing - 31 March 2022
- **AQ Strategic Board / Working Group Meeting:** Final AQAP briefing - 31 May 2022
- **Executive Management Team (EMT):** Final AQAP briefing - 08 June 2022
- **Cabinet Briefing:** 21 June 2021
- **Sustainable Development Select Committee:** Final AQAP briefing - Monday 27 June 2022
- **Lewisham Mayor and Cabinet approval:** 6 July 2022
- **Publication:** Autumn/Winter 2022
- **Implementation, monitoring and reviews after:** Autumn/Winter 2022 – April 2027

1. Summary

- 1.1. The London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP sets out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027 (**Appendix 1**). The AQAP includes measures (and key progress indicators) that will be adopted by LBL to deal with air pollution and avoid unacceptable harm being caused to human health and the environment as a whole.
- 1.2. This action plan replaces the previous plan which ran from 2016-2021. The achievements from the previous plan are summarised in the introduction of the new plan for 2022-27.
- 1.3. The 2022-2027 AQAP has been designed in accordance with the London Local Air Quality Management (LLAQM) Policy Guidance and Technical Guidance. As well as setting out plans for the next five years, it also provides an opportunity to reflect on the effectiveness of measures introduced by the 2016-2021 AQAP.
- 1.4. As stated above, the revised AQAP lays out the Council's current and future ambitions to reduce air pollution. As with much of London, improving air quality is a key priority in LBL because of the negative effect that poor air quality has on Lewisham residents and visitors, particularly vulnerable residents including older people, children, individuals with existing cardiovascular or respiratory disease, pregnant women, communities in areas of higher pollution, such as those close to busy roads and low-income communities.
- 1.5. Schedule VI of the Environment Act 1995 requires local authorities to consult on their AQAP with the range of internal and external stakeholders and organisations as detailed in the report.
- 1.6. A statutory and public consultation was undertaken on the proposed actions considered by LBL to reduce air pollution in Lewisham as detailed in the consultation responses report attached to this report (**Appendix 2**).
- 1.7. The air quality agenda affects all aspects of the Council's work and our activities go hand

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in hand with our commitments to address climate change by developing and extending walking, cycling and the wider use of public transport.

- 1.8. Improving air quality is part of an integrated approach to dealing with the climate emergency. Lewisham's Climate Emergency Action Plan was approved by the Mayor and Cabinet in 2020 and includes a range of radical actions across the Council's corporate estate, housing, transport and green spaces intended to support delivery of the ambition for Lewisham to be carbon neutral by 2030.
- 1.9. It is of paramount importance to ensure that the AQAP fulfils its goal in producing quantifiable outcomes to timescale. This requires all delivery partners who have an influence on air quality within the borough to take ownership of the AQAP. The AQAP development was overseen by a steering group that includes representatives from services including Environmental Protection/Environmental Health, Climate Resilience, Planning, Communication, Transport, Highway and Public Health within Lewisham Council.
- 1.10. The AQAP includes a foreword from the relevant Cabinet Members and also the signatures of the Borough's Director of Public Health, the Head of Transport and the Head of Planning.
- 1.11. Each measure adopted within the AQAP includes details of the key indicators to use within further reports to track their delivery within agreed timescales. Progress on implementing individual measures within the AQAP will need to be reported in the Department for Environment, Food and Rural Affairs (DEFRA) approved Annual Statutory Report (ASR) scheme and published on the LBL website.

2. Recommendations

- 2.1. The Sustainable Development Select Committee is being asked to:
 - Note the AQAP consultation report.
 - Note the new World Health Organization (WHO) air quality guideline for PM_{2.5}.
 - Review and comment on the final AQAP 2022-27.

3. Policy Context

- 3.1. **Air Quality Management Areas**
- 3.2. Similarly to other London boroughs, LBL was declared an Air Quality Management Area (AQMA) in 2001, due to air quality levels for two key pollutants, nitrogen dioxide (NO₂) and particulate matter (PM), exceeding statutory limits.
- 3.3. NO₂ is created when fuel is burnt and the main sources include combustion engines, heating plants and construction plant/vehicles.
- 3.4. PM is a generic term used to describe a complex mixture of solid and liquid particles of varying size, shape, and composition. Some particles are emitted directly (primary PM); others are formed in the atmosphere through complex chemical reactions (secondary PM).
- 3.5. The composition of PM varies greatly and depends on many factors, such as geographical location, emission sources and weather. Particulates are classified according to size. The UK is currently focused on measuring the fractions of PM where particles are less than 10 micrometres in diameter (PM₁₀) and less than 2.5 micrometres in diameter (PM_{2.5}) based on the latest evidence on the effects of PM to health.

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- 3.6. PM₁₀ is made up from a variety of substances i.e. soot, dust and secondary particles formed by the reaction of other pollutants in the air. The main sources of particulate matter are combustion engines, biomass heating plants (wood fuelled), brake and tyre wear, construction activity/plant and Heavy Goods Vehicles (HGVs).
- 3.7. PM_{2.5} in London comes from regional, and often trans-boundary (non-UK) sources. Therefore, the powers to tackle these emissions involves London, the UK and other European governments which can make it difficult to address these emissions with direct measures.
- 3.8. Due to the small size of many of the particles that form PM some of these toxins may enter the bloodstream and be transported around the body, lodging in the heart, brain and other organs. Exposure to PM can result in serious impacts to health, especially in vulnerable groups such as the young, elderly and those with respiratory problems. PM_{2.5} are harmful to human health in all concentrations.
- 3.9. Under Part 4 of the Environment Act 1995 LBL is required to provide an AQAP to address the areas of poor air quality identified within the AQMA.
- 3.10. **London Environment Strategy 2018**
- 3.11. In the London Environment Strategy 2018, the Mayor of London committed to meeting World Health Organisation recommended limits for PM_{2.5} of 10µgm⁻³ by 2030. Boroughs have a key role to play in helping to meet this target, and the LLAQM will continue to play a vital role in shaping borough action on addressing this pollutant. Boroughs are requested to include a focus on PM_{2.5} in their AQAPs and to maintain AQMAs for PM₁₀, even if they are technically meeting the legal limit. Currently, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects. Therefore, further reduction of PM and/or NO₂ concentrations below air quality standards is likely to bring additional health benefits.
- 3.12. **Government legislation for Particulate Matter (PM)**
- 3.13. In July 2019, the Government announced it would legislate to make World Health Organisations (WHO) PM_{2.5} limits legally binding. At the time of writing, it is unclear how and when this will come into force. Boroughs will of course need to follow any new national legislation. If the Government does not set a compliance date that is sooner than 2030, boroughs are asked to retain the ambition to meet this limit by 2030. The matter will be kept under review by the Mayor of London.
- 3.14. **World Health Organisation (WHO) recommended guidelines for air pollution**
- 3.15. In 2021, the WHO updated its recommended guidelines for air pollutants. For PM_{2.5}, it tightened the recommended annual average guideline to 5µgm⁻³, while retaining 10µgm⁻³ as an interim guideline which the Mayor of London has committed to meet by 2030 (the legal annual average limit is 25µgm⁻³). For nitrogen dioxide (NO₂) the WHO tightened the recommended annual average guideline to 10µgm⁻³ (the previous WHO guideline was 40µgm⁻³ which is also the legal annual average limit). These changes underscore that, despite the significant progress made, accelerated additional action is needed to protect human health. Delivering this action will require the Government to work with the Mayor of London and provide further powers and resources. The Mayor of London continues to make the case for these.
- 3.16. The Government is currently in the process of preparing secondary legislation following passage of the Environment Act in 2021 to amend existing legally binding air quality limits. The Mayor of London has made the case for these to be aligned with the new

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interim WHO recommended guidelines, which are based on the best available health evidence. These reflect the overwhelming weight of evidence about the devastating health impacts of air pollution – even at low levels requiring further action to deal with air quality around schools. DEFRA is currently working on new PM_{2.5} local authority guidance and a new UK Air quality strategy due end 2022.

- 3.17. The Greater London Authority (GLA) has introduced a “PM_{2.5} borough role” for borough air quality teams so that alongside measures to tackle other pollutants, they also consider action that is necessary to address PM_{2.5} issues in their areas, aligning their interests with those of borough public health officers.
- 3.18. Boroughs are expected to work towards reducing emissions and concentrations of PM_{2.5} in their areas. In doing so they are not required to carry out any additional local review and assessment (including monitoring) but can instead make use of the PM_{2.5} modelling and source apportionment provided in the LLAQM borough-specific London Atmospheric Emissions Inventory (LAEI) packages to be supplied by the GLA by the end of 2022.
- 3.19. Where PM₁₀ monitoring is available, London boroughs may also follow guidance on how to estimate PM_{2.5} from PM₁₀ monitoring data, as provided in Chapter 4 and Appendix B of LLAQM technical guidance. Boroughs are asked to set out in their AQAP how they will fulfil their role to work towards reducing PM_{2.5} and any actions they are taking or will take.

3.20. **Particulate Matter (PM)_{2.5} in Lewisham**

- 3.21. PM_{2.5} is monitored at two automatic stations in Lewisham (New Cross and Deptford) and there was no exceedance of PM_{2.5} EU legal limits. However these limits are significantly less stringent than the recommended World Health Organisation (WHO) guidelines.
- 3.22. The AQAP make consideration as to how PM_{2.5} will be addressed alongside other pollutants in Lewisham. The combination of Government and local actions and policies currently in force or coming into force, as laid out in our AQAP, will help bring about a reduction of PM_{2.5} across Lewisham and London as a whole.
- 3.23. This work involves the GLA, TfL, DEFRA and other relevant organisations. While waiting for the new local authorities DEFRA guidance on how to deal with PM_{2.5} due at the end of 2022, actions under consideration will include:
 - Real-world driving emissions testing, tyre and brake wear testing, and new emission standards (for example Euro 7).
 - The extension of the central London ULEZ and cleaning up the bus and taxi fleets.
 - Encourage more trips to be made by walking, cycling or using public transport to reduce car use, in line with the Mayor of London’s Transport Strategy.
 - Reduce emissions from biomass burning (including domestic wood burning), construction, with emissions from Non-Road Mobile Machinery (NRMM), and from cooking (including commercial cooking).
 - Government policies with increase ability to reduce PM_{2.5} emissions from road transport as detailed in the London Environment Strategy and Mayor of London’s Transport Strategy.
 - Actions within the Clean Air Act 1993, which enables local authorities to tackle smoke emissions from chimneys of buildings, fixed boilers and industrial plants. More action will be considered to target domestic combustion as the major source of PM_{2.5}.
 - Consideration will be given to reassess the tools available to Lewisham Council so that we have greater powers to declare and enforce smoke control areas. Tighter minimum emission standards for burning stoves and ban domestic burning in areas with high PM_{2.5}

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levels will be considered.

- Locating receptors designated as sensitive receptors near main roads.
- Installing more PM_{2.5} monitors around schools and other vulnerable receptors like hospitals and care homes. If funding opportunities arise for new air quality monitors, priority will be given to monitoring PM_{2.5}.
- Lewisham Council commissioned a reference monitor in Deptford that will measure PM_{2.5}, increasing our PM_{2.5} reference monitoring locations (Lewisham Council has monitored PM_{2.5} on New Cross Road since 2015).

3.24. **Public Health Outcomes Framework**

- 3.25. The Public Health Outcomes Framework (PHOF) indicators 2019 to 2022 contain an Air Quality Indicator 3.1 that should not be seen in isolation from the other PHOF indicators. For instance, as well as reducing emissions, encouragement of active travel will have wider public health benefits captured in other PHOF indicators such as increased physical activity (PHOF indicator 2.13) and reducing excess weight at various ages (PHOF indicators 2.6 and 2.12). These co-benefits should form part of an overall approach as they will maximise the benefits and viability of any proposed measures.

3.26. **Contribution to local strategic outcomes**

- **Climate Emergency Action Plan (2020)** – This sets out the Council’s ambition for Lewisham to be a carbon neutral borough by 2030. More than 25% of the borough’s carbon emissions come from transport, including vehicles travelling in or through the borough. Within the action plan, one of the key policies to move to a decarbonised transport network is to implement a Healthy Neighbourhoods programme to reduce traffic congestion, improve air quality and encourage sustainable modes of travel. The intention is to implement a rolling programme across every area of the borough by 2030 School Air quality Action Plan (Ongoing).
- **Transport Strategy and Local Implementation Plan 2019-2041** – The objectives of the Council’s transport strategy is for travel by sustainable modes to be the most pleasant, reliable and attractive option for those travelling to, from and within Lewisham; Lewisham’s streets to be safe, secure and accessible to all; Lewisham’s streets to be healthy, clean and green with less motor traffic; and Lewisham transport network to support new development whilst providing for existing demand.
- **Cycling Strategy (2017)** – This sets out the Council’s vision for cycling to be a safer and more attractive option for travel. This includes schemes such as Liveable Neighbourhoods where space is made available for people to enjoy streets without motor vehicles, particularly near schools, to help those walking and cycling.
- **Draft Health and Wellbeing Strategy 2021-2026** – The Council is planning a refresh of its Health and Wellbeing Strategy which will be finalised in 2022. This will build on the Health and Wellbeing Strategy for 2015-2018 which seeks to improve health outcomes for residents, and outlines the need to create physical and social environments that encourage healthy habits, choices and actions.
- **Lewisham Manifesto Commitments 2022-26**

The AQAP 2022-27 aligns with several manifesto commitments in the ‘Cleaner and Greener’ Climate Emergency and Cleaner Streets; and Transport and Air Quality

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sections.

4. Background

- 4.1. The LBL AQAP was developed in line with the LBL Corporate Strategy 2018-2022. It is a legal requirement for Local Authorities to work towards the air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that Act. The Council is expected to meet the requirements of the London Local Air Quality Management statutory process¹.
- 4.2. The proposed AQAP outlines how LBL will effectively use local levers to tackle air quality issues within its control and lead by example. It is recognised that there are many air quality policy areas that are outside of the Council's influence (such as National standards, national vehicle taxation policy, taxis and buses). We will continue to work with and lobby regional and central government on such policies and issues.
- 4.3. The draft AQAP was written in collaboration with and approved by all the relevant internal stakeholders including the Directors Transport, Planning, Public Health, and Public Realm.

5. Requirement for an Air Quality Action Plan (AQAP) 2022-27

- 5.1. LBL was declared an Air Quality Management Area (AQMA) in 2001, due to air quality levels for NO₂ and PM exceeding statutory limits (Section 1.1 of the AQAP shows the geographic locations).
- 5.2. Under Part 4 of the Environment Act 1995, LBL is required to provide an AQAP to address the areas of poor air quality identified within its AQMAs.
- 5.3. There is strong evidence that NO₂ and PM are harmful to health in several ways including (1) **short term exposure** is associated with worsening symptoms of pre-existing lung disease and asthma, as well as increased risk of cardiovascular events such as myocardial infarction and stroke; (2) **long term exposure** is associated with an increased risk of developing cardiovascular disease and cancer, reduced lung function for both children and adults and low birth weight; and (3) **vulnerable groups** i.e. the very young and old are at high risk of health impacts, as well as those with pre-existing conditions i.e. diabetes, respiratory disease and obesity. Poor diet, deprivation and proximity to pollution sources also have an impact on health inequalities.
- 5.4. The AQAP 2022-27 outlines action to improve air quality in the AQMAs and will replace the previous AQAP which ran from 2016 to 2021.

6. Air Quality Action Plan (AQAP) 2022-27 consultation

- 6.1. When preparing the AQAP, LBL had a statutory duty to consult with a range of bodies. The consultation period is not defined in the statute, but as a key policy, a minimum consultation period of 6-8 weeks is normally used by the Council. Other councils have consulted on their Air Quality Action Plans for between 4 and 12 weeks. 6 weeks was selected as a reasonable time to carry out a detailed consultation.
- 6.2. LBL had discretion as to what form the consultation would take. As outlined in the

¹ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

introduction of the AQAP, the COVID-19 pandemic and government restrictions meant that it was not possible to hold public meetings at the time of compiling the AQAP. As a result, only virtual meetings and virtual media campaigns were used. An online questionnaire was also used during the consultation, which was made available in accessible formats.

- 6.3. The Mayor of London is a key statutory consultee and approves the final AQAP prior to publication. In addition, the Council must consult:
- the Secretary of State;
 - the Environment Agency;
 - Transport for London (who will provide a joint response with the Mayor of London);
 - all neighbouring boroughs and/or neighbouring district and county councils;
 - other public authorities as the borough considers appropriate;
 - bodies representing local business interests and
 - other persons/organisations as considered appropriate.
- 6.4. The AQAP consultation report is included as an Appendix to this report (see **Appendix 2**). The consultation findings informed revision of the draft AQAP to complete a final version, which can be found in **Appendix 1** of this report.

7. Air Quality Action Plan (AQAP) 2022-27 Themes

- 7.1. The final AQAP 2022-27 contains actions under seven key themes are as follows (in order of priority):
- 7.2. **Monitoring and other core statutory duties:** Maintenance of monitoring networks is critical to understand where pollution is most acute in Lewisham and to assess which measures are most effective to reduce pollution. This is one of a number of statutory duties.
- 7.3. **Emissions from developments and buildings:** Emissions from buildings account for about 15% of the NOX emissions across London and are important in affecting NO2 concentrations.
- 7.4. **Public health and awareness raising:** Increasing awareness can drive behavioural change to lower emissions as well as reducing exposure to air pollution.
- 7.5. **Delivery servicing and freight:** Vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO2 emissions.
- 7.6. **Borough fleet actions:** Our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO2 emissions. Addressing our own fleet means we will be leading by example.
- 7.7. **Localised solutions:** These seek to improve the environment of neighbourhoods through a combination of measures.
- 7.8. **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 cars) as far as possible.
- 7.9. The action plan considers measures and actions in terms of costs, effectiveness, time-scales and feasibility of implementation. We cannot guarantee that we will be able to do everything that is presented in this plan immediately. However, we will work hard to

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achieve the aim and objectives of this plan.

8. Financial implications

- 8.1. Each action proposed in Table 4.1 of the AQAP in **Appendix 1** was put forward on the basis of an initial high level cost benefit analysis. The actions proposed were judged to be able to create a meaningful reduction of the concentrations of pollutant in the AQMA's cited, and across the Borough as a whole, whilst being achievable at a reasonable cost.
- 8.2. Although specific costs are yet to be finalised, it is anticipated that financial contributions from the Council for implementing actions will come from various sources. These include; indirectly from the commitment of officer time where actions involve the development of partnerships and policies to drive change to direct cash contributions where procurement of works or services may be required.
- 8.3. There is currently no budget specifically set aside for the implementation of the AQAP. Services will need to prioritise officer time to develop and implement solutions in line with existing statutory obligations and the Council's Corporate Strategy priorities. The financial cash investments, where needed, will need to be funded from existing service budgets or met from grants or other contributions that may be allocated to these actions.
- 8.4. For those actions requiring Council funding which cannot be met from existing budgets, services will need to bid for and secure grant or other contributions before committing to expenditure. It is understood that there are regular opportunities to bid for funding for Air Quality projects from different sources including DEFRA / MAQF and Transport for London (TfL). Every opportunity will be made to secure funding from these sources during the life of this AQAP. In some cases, government grants from the likes of DEFRA / MAQF may require a proportion of match funding contribution to be successful. This percentage is often 10% for the DEFRA bid and variable for MAQF. COVID-19 has significantly and negatively impacted TfL budgets which may reduce funding available from this source.
- 8.5. The report also notes that Officers will continue to identify external funding sources and where appropriate use of s106 / Community Infrastructure Levy (CIL) funding to deliver the outcomes outlined in the action plan. As the aims of the AQAP accord with the aims of the Climate Emergency Action Plan some funding from that reserve, currently £92k, may be drawn on for match funding purposes.
- 8.6. The monitoring of the financial expenditure for agreed capital and revenue projects supporting these strategies forms part of the regular council wide monitoring procedures.

9. Procurement

- 9.1. Strategic Procurement will work with services to deliver the Air Quality Action Plan to ensure appropriate inclusion within future procurement requirements and policy.

10. Legal implications

- 10.1. Air quality standards and objectives are set out in the Air Quality (England) Regulations 2000. The Council has a duty to review the quality of air within their area under Part IV of the Environment Act 1995.
- 10.2. Where the relevant standards and objectives are not being met, the Council has a duty to designate an air quality management area and prepare an action plan.
- 10.3. The action plan must include the time(s) within which the Council proposes to implement its measures and include proposals submitted by the Mayor of London for the exercise of the Mayor's powers.

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- 10.4. Where preparing an action plan, the Council must consult the Mayor of London, the Secretary of State, the Environment Agency, the Highway Authorities for the area, neighbouring local authorities, appropriate public authorities exercising functions in the vicinity, bodies representing local business interests, and other bodies or organisations as considered appropriate.
- 10.5. The Council must have regard to the guidance issued by the Mayor of London. The Mayor of London also has broad powers to direct the Council to take action in respect of air quality, and the Council must comply with any such direction.
- 10.6. The Mayor of London expects action plans to be updated at least every 5 years.

11. Equalities implications

- 11.1. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to: (1) eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act; (2) advance equality of opportunity between people who share those protected characteristics and people who do not; and (3) foster good relations between people who share those characteristics and people who do not.
- 11.2. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/belief, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 11.3. Air pollution is associated with a number of adverse health impacts and it is recognised as a contributing factor in the onset of heart disease and cancer. There is a strong association between air pollution and equalities issues. It particularly affects the most vulnerable in society, including children and older people, and those with long-term health conditions. Moreover, areas with poor air quality are also often the less affluent areas, in which Black Asian and Minority Ethnic communities constitute a relatively high proportion of the resident population.
- 11.4. The AQAP will improve outcomes for individuals and groups who share protected characteristics including age, race and ethnicity, and disability. By taking action to mitigate the effects of air pollution, the Council is working to address a known inequality in terms of environmental quality.
- 11.5. An Equality Impact Assessment (**Appendix 3**) has been undertaken to support the revised AQAP. The Assessment provides further details on how the strategy will support work to tackle inequalities, such as those relating to health in Lewisham. There is no perceived negative impact on end users and the Assessment found that the adoption of the AQAP is likely to have a positive impact on the health of all groups of the population in Lewisham and beyond.

12. Climate change and environmental implications

- 12.1. Improving air quality is part of an integrated approach to addressing the climate emergency. Local government has been at the forefront of a call for sustained and significant action on climate change. The ambitious climate emergency targets and plans set by LBL, alongside organisations and bodies across the country, are among the first steps in the response to the climate and ecological crisis that has resulted from global inaction and ignoring the emerging crisis.
- 12.2. The climate emergency is a key challenge for Lewisham and the United Kingdom in general. The impetus for change is that the demand for action on the climate crisis has come from citizens, and particularly young people, locally, nationally and internationally. This call for action is grounded in a greater understanding of the connections between

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the local environment, the quality of our open spaces and the air we breathe, and sustainability at a global level.

- 12.3. Lewisham's Climate Emergency Action Plan was approved by the Mayor and Cabinet in 2020 and includes a range of radical actions across the Council's corporate estate, housing, transport and green spaces intended to support delivery of the ambition for Lewisham to be carbon neutral by 2030.
- 12.4. Carbon dioxide is not, in itself, considered a primary pollutant in terms of air quality, but the main sources of carbon at a local level, particularly in urban environments, are energy use in the home and transport. These are also key determinants of local air quality.
- 12.5. LBL has statutory duties under the London Local Air Quality Management (LLAQM) scheme to monitor a variety of pollutants across the borough including around building sites.
- 12.6. Emissions from buildings and NRMM also account for about 15% of the NOX emissions across London so are important in affecting NO2 concentrations. Borough wide actions to reduce emissions from buildings will often result in reduced air pollution and carbon emissions, and activities to increase green infrastructure and green space in urban areas help reduce air pollution as well as reducing the urban heat island effect and absorbing carbon dioxide.
- 12.7. It must be emphasised that some of the air quality focus areas located in the north of the borough coincide very well with the focus areas identified in our Strategy Heat Network map. Therefore combined actions will be considered as part of Climate emergency plan and this air quality action plan in these areas.

13. Crime and disorder implications

- 13.1. This is not directly applicable to this decision. However investigating the links between poor air quality, inequality and healthy street indices could help to address crime and disorder issues across the borough.

14. Health and wellbeing implications

- 14.1. The adoption of the AQAP is likely to have a positive implication on human health and wellbeing.
- 14.2. The Lewisham Health Protection Committee (HPC) is chaired by a Consultant in Public Health nominated by the Director of Public Health (DPH). The DPH is well briefed on air quality issues and updates. The HPC reports to Health and Wellbeing Board and will review any implications as relevant.
- 14.3. The Lewisham HPC reports include section on trends of air quality across the borough therefore the outcomes are directly linked to air quality data.

15. Background papers

- 15.1. London Local Air Quality Management (LLAQM) Policy Guidance 2019
<https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>
- 15.2. All our reports and air quality monitoring data are available at the following links
<https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality->

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- 15.3. Pollution concentrations across Lewisham can be accessed at <https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels>

16. Glossary

Term	Definition
AQ	Air Quality
AQAP	Air Quality Action Plan
AQFA	Air Quality Focus Area
AQG	Air Quality Guideline
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BAME	Black, Asian and Minority Ethnic
DEFRA	Department for Environment, Food and Rural Affairs
DMT	Departmental Management Team
DPH	Director(s) of Public Health
EP	Environmental Protection
EqIP	Equality Impact Assessment
GLA	Greater London Authority
HGV	Heavy Goods Vehicles
HPC	Health Protection Committee
IT	Interim Target
JNSA	Joint Strategic Needs Assessment
KPI	Key Performance Indicator
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LBL	London Borough of Lewisham
LLAQM	London Local Air Quality Management
LTN	Low Traffic Neighbourhood
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
TfL	Transport for London
ULEZ	Ultra Low Emissions Zone

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WHO	World Health Organisation
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18. Appendices

- 18.1. Appendix 1 Final Air Quality Action Plan 2022-2027
- 18.2. Appendix 2 Consultation responses report and Appendix B2 (Qualitative Consultation Responses Q4 Q5 and Q8)
- 18.3. Appendix 3 Equality Impact Assessment (EqIP)
- 18.4. Appendix 4 GLA Approval Letter

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London Borough of Lewisham

Air Quality Action Plan 2022-2027



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June 2022 (Rev1)

London Borough of Lewisham Air Quality Action Plan 2022-2027

SUMMARY

This draft Air Quality Action Plan (AQAP) has been produced as part of our duty to London Local Air Quality Management. It outlines the actions we will take to improve air quality in the London Borough of Lewisham between 2022 and 2027. This action plan replaces the previous plan which ran from 2016 to 2021.

This 2022-2027 AQAP has been designed in accordance with the London Local Air Quality Management (LLAQM) Policy Guidance and Technical Guidance¹. As well as setting out plans for the next five years, it also provides an opportunity to reflect on the effectiveness of measures introduced by the 2016 to 2021 AQAP.

Additions for the 2022 to 2027 AQAP include:

- Use of the most current information available as well as resources to revise the existing measures to improve air quality across the borough. The 2019 London Atmospheric Emissions Inventory (LAEI) was published on 16 December 2021. It provides an update to the previous LAEI 2016 and a new baseline for 2019². The area covered by the LAEI includes Greater London (the 32 London boroughs and the City of London), as well as areas outside Greater London up to the M25 motorway. Projections for the years 2025 and 2030 are also being produced and these will be available in spring 2022. The bespoke borough maps presented in this plan will be updated when new data becomes available in spring 2022.
- Quantification of the impacts of proposed measures wherever possible – including data on emissions and concentrations obtained locally, as well as published modelled statistical data.
- Consideration of measures to monitor and evaluate the effectiveness of the plan.
- Clear delivery objectives, including key milestones, timescales and expected outcomes for LBL and other delivery partners.
- Stating how LBL, including its transport, planning and public health departments, and its external delivery partners, will take ownership of dealing with air quality issues and how we will work together to deliver the AQAP's defined objectives.
- Setting up clear governance and ownership by the borough, which extends to all parts of the AQAP, and includes all contributing departments and corporate.
- Maintain measures that can deliver the required level of emissions reductions to meet air quality objectives within clearly defined timescales that are acceptable to the GLA.

During the course of the 2016 - 2021 AQAP, the Council's key priorities included:

- Reducing car use and making walking, cycling and public transport our preferred choice of travel. Where the car needed to be used, we promoted car clubs and zero emission vehicles.
- Reducing children's exposure to poor air quality and building on the anti-idling schools programme.
- Working with businesses to make changes to deliveries and construction and;
- Encouraging the use of technology to be better informed to take decisive action.

¹ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

² <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

Since the adoption of the previous action plan in 2016, there has been significant progress made to improve air quality in Lewisham as reported in our annual status reports³ available on our website.

Council priorities have been on behavioural change and providing a focused approach with children, schools, transport and infrastructure projects.

This AQAP has been approved by:

Name of Council member	Name	e-signatures	Date
Cabinet Member for Environment and Transport	Cllr Louise Krupski	This will be included before publication	This will be included before publication
Director of Public Health	Dr Catherine Mbema	As above noted	As above noted
Director of Planning	Emma Talbot	As above noted	As above noted
Director of Public Realm	Zahur Khan	As above noted	As above noted
Executive Director for Housing, Regeneration and Public Realm	Jennifer Daothong	As above noted	As above noted
Executive Director Community Services	Tom Brown	As above noted	As above noted

This AQAP will be subject to annual review, appraisal of progress and reporting to Lewisham Health Protection Committee and Lewisham Strategic Air Quality Board.

Progress each year will be reported in the Annual Status Reports, as part of our statutory London Local Air Quality Management duties.

All reporting will be carried out in accordance with the current COVID-19 Department for Environment, Food and Rural Affairs (Defra) and the GLA guidance.

If you have any comments on this AQAP please send them to Dr Eliane Scholastiq, Foteu Madio at:

ElianeScholastiq.foteumadio@lewisham.gov.uk or Environmentalprotection@lewisham.gov.uk

The London Borough of Lewisham
Environmental Protection Team

³ <https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality-action-plan-and-other-reports>

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Contents

SUMMARY	ii
Abbreviations	vii
Foreword (Picture of Cllr Louise Krupski)	1
Introduction	2
Main achievements during the course of the Lewisham AQAP 2016 to 2021	2
1 Summary of current air quality in London Borough of Lewisham	20
1.1 AQMAs and Focus areas	27
2 Our Air Quality Priorities	9
3 Development and Implementation of our AQAP	16
3.1 Consultation and Stakeholder Engagement	16
3.2 Steering Group	16
4 Action Plan Table	19
Appendix A Response to Consultation	a
A consultation responses report is attached to this action plan	b
Appendix B Reasons for Not Pursuing Action Plan Measures	f
Appendix C Links between Air Pollution and Other important LBL Strategies	g
Appendix D Summary of Current National Air Quality Standards/ Objectives and WHO air quality guidelines	o

Tables

Table 1.1 Past and Ongoing LIP projects in Air Quality Focus Areas	1
Table 2.1 Lewisham Air quality Priorities for 2022-2027	13
Table 3.1 Consultation Undertaken	16
Table 3.2 List of Design Meeting with Internal Stakeholders	17
Table 4.1 Air Quality Action Plan	21
Table A.1 Summary of Responses to Consultation and Stakeholder Engagement on the AQAP	b
Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision	f
Table C.1 The PM ₁₀ Automatic Monitoring Results: Comparison with 24-Hour Mean Objective, Number of PM ₁₀ 24-Hour Means > 50 µg m ⁻³	i
Table D.1 WHO air quality guidelines prior to September 2021	o
Table D.2 Current WHO air quality guidelines published in 2021	p

Figures

Figure 1 Trend of overall NO ₂ annual mean concentration (in µg m ⁻³) with time	6
Figure 2 Modelled map of annual mean NO ₂ concentrations (from the LAEI 2016)	24
Figure 3 LAEI baseline annual mean PM ₁₀ concentrations (from the LAEI 2016)	25
Figure 4 Number of days with a daily PM ₁₀ mean greater than 50 µgm ⁻³ (from the LAEI 2016).....	25
Figure 5 LAEI baseline annual mean PM _{2.5} concentrations (from the LAEI 2016)	26
Figure 6 AQMA declared in 2001 and 2013	28
Figure 7 The geographic location of the AQMA within the areas declared in 2001 (not to scale).....	29
Figure 8 Air Quality Focus Areas in London Borough of Lewisham (from the LAEI 2013)	30
Figure 9 (a) 2019 NO _x London Emissions by source (from the LAEI 2021) and (b) LBL NO _x Emissions by source (from the LAEI 2016)	3
Figure 10 NO _x Emissions by vehicle type breakdown (from the LAEI 2016)	4
Figure 11 (a) 2019 PM ₁₀ London Emissions by source (from the LAEI 2021) and (b) PM ₁₀ LBL Emissions by source (from the LAEI 2013).....	5
Figure 12 PM ₁₀ Emissions by vehicle type with total emissions from brake, tyres and exhaust (from the LAEI 2013)	6
Figure 13 (a) 2019 PM _{2.5} London Emissions by source (LAEI, 2021) and (b) PM _{2.5} LBL Emissions by source (LAEI, 2013)	7
Figure 14 PM _{2.5} Emissions by vehicle type with total emissions from brake, tyres and exhaust (LAEI, 2013)	8
Figure 15 2019 CO ₂ London Emissions by source (LAEI, 2021)	8
Figure 16 Trend of overall NO ₂ annual mean concentrations with time vs WHO interim targets/AQG	h
Figure 17 PM ₁₀ Concentration vs WHO interim targets/AQG	i
Figure 18 PM _{2.5} Concentrations vs WHO interim targets/AQG	k
Figure 19 Some local strategies linked to this AQAP	l
Figure 20 Relationship between air quality focus areas and strategic heat network in Lewisham	m
Figure 21 Relationship between air quality policies and Lewisham local development framework	n

Abbreviations

AQ	Air Quality
AQAP	Air Quality Action Plan
AQFA	Air Quality Focus Area
AQG	Air Quality Guideline
AQMA	Air Quality Management Area
AQN	Air Quality Neutral
AQO	Air Quality Objective
BoC	Borough of Culture
BEB	Buildings Emission Benchmark
BREEAM	Building Research Establishment Environmental Assessment Method
BEIS	Department for Business, Energy and Industrial Strategy
BLN	Business Low Emission Neighbourhood
BTL	Bakerloo Tube Line
CAB	Cleaner Air Borough
CAV	Cleaner Air Villages
CAZ	Central Activity Zone
CEMP	Construction Environmental Management Plan
CEO	Civil Enforcement Officer
CHP	Combined Heat and Power
CP	Charge Point
CPZ	Controlled Parking Zone
CRP	Cross River Partnership
DEC	Design Engineer Construction
DEFRA	Department for Environment, Food and Rural Affairs
DMT	Departmental Management Team
DMLP	Development Management Local Plan
DPH	Director(s) of Public Health
DSP	Delivery and Servicing Plan
EP	Environmental Protection
EPC	Energy Performance Certificate
ERG	King's Environmental Research Group
EV	Electric Vehicle
FORS	Fleet Operator Recognition Scheme
GLA	Greater London Authority

GULCS	Go Ultra Low City Scheme
HGV	Heavy Goods Vehicles
HMO	Homes in multiple occupation
HPC	Health Protection Committee
IT	Interim Target
JNSA	Joint Strategic Needs Assessment
KPI	Key Performance Indicator
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LBL	London Borough of Lewisham
LDF	Lewisham Local Development Framework
LEN	Low Emission Neighbourhoods
LLAQM	London Local Air Quality Management
LTN	Low Traffic Neighbourhood
NCIL	Neighbourhood Community Infrastructure Levy (NCIL)
NRMM	Non-Road Mobile Machinery
MAQF	Mayor's Air Quality Fund
PM ₁₀	Particulate matter less than 10 micron in diameter
PM _{2.5}	Particulate matter less than 2.5 micron in diameter
PNC	Penalty Charge Notice
PSV	Public Service Vehicle
OLEV	Office for Low Emission Vehicles
TEB	Transport Emissions Benchmark
TfL	Transport for London
SPDs	Supplementary planning documents
STARS	Sustainable Travel: Active, Responsible, Safe
UHL	University Hospital London
ULEZ	Ultra-Low Emissions Zone
WHO	World Health Organisation

Foreword (Picture of Cllr Louise Krupski)

We would like to thank all those whose engagement has helped shaped the actions presented in this plan. Lewisham’s Air Quality Action Plan is central to the Council’s commitment to improve air quality in the borough over the next five years, from 2022 to 2027.

In fulfilling our ambition to reduce air quality across the borough, we will help achieve carbon neutrality by 2030. Lewisham was one of the first local authorities in London to declare a climate emergency. The case for clean air and healthy environments continues to gain momentum as our understanding of the benefits we can all gain as a result increases. Lewisham’s Climate Emergency Action Plan, approved by the Mayor and Cabinet in 2020, includes a range of measures across the Council’s corporate estate, housing, transport and green spaces, with the ambitious aim of Lewisham being carbon neutral by 2030. Tackling air quality, which will improve the environment and reduce carbon emissions, is integral to that goal.

This air quality action plan outlines what the Council will do to reduce concentrations of pollution, and exposure to air pollution through nation-wide partnerships. It is our aim to protect and improve the boroughs’ health, wellbeing, and reduce health inequalities. This work will further support local and national government’s work on improving air quality. The UK Clean Air Strategy, which was published in January 2019, sets out plans to meet ambitious legally-binding targets to reduce emissions of the five most damaging air pollutants by 2020 and 2030. It will be replaced by a newer version due this year, and the wider Environment Bill.

Air quality has a major impact on the health and quality of life of residents and visitors to the borough. Air pollution can have a detrimental effect on people’s health, especially our most vulnerable citizens; children, the elderly and people with existing health conditions. The Council has made important strides in improving air quality in the borough in recent years but we know there is more that needs to be done. We want to work with residents, local businesses and our London partners to make Lewisham a cleaner, greener, healthier place to live, work and visit.

The persistent rise of road, air and industrialisation among other activities with the potential to emit pollutant into the environment means air quality remains a major issue for the public’s health. In accordance with Public Health England in 2020, walking, cycling and other forms of active travel are great for improving health and reducing air pollution, but too often people are put off by the risk of exposure to high concentrations of pollutants. With an estimated effect equivalent to 28,000 – 36,000 deaths each year attributable to human-made air pollution in the UK, more action is clearly needed.

Action is needed at all levels to address this unacceptable, serious and avoidable source of harm to our health. We all have a role to play in helping to make sure that the air that we, and future generations, breathe is clean air. We have considered measures and actions in terms of costs, effectiveness, time-scales and feasibility of implementation. We cannot guarantee that we will be able to do everything that you want us to do immediately. However, we will work hard to achieve our duty, the aim and objectives of this plan.

Name of Council member	Name	e-signatures	Date
Cabinet Member for Environment and Transport	Cllr Louise Krupski	<i>This will be included prior to publication</i>	<i>This will be included prior to publication</i>

Introduction

This report outlines the actions that LBL will deliver between 2022 and 2027 to reduce concentrations of pollution, and exposure to pollution. This will positively impact on the health and quality of life of residents and visitors to the borough.

The action plan is a 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.

COVID-19 pandemic and new compendium

The coronavirus (COVID-19) pandemic put considerable pressure on the Environmental Health/ Environmental Protection resources of all local authorities, including Lewisham. At the same time, there has been a great deal of media and political attention on the health impacts of poor air quality, and growing evidence of links between air quality and higher COVID-19 infection and mortality rates.

Addressing these challenges, in addition to its ongoing responsibilities, has left many local authority teams stretched to capacity. Another factor is that there has been a general decrease in concentrations of NO₂ across Lewisham during 2020 due to reductions in movement as a result of lockdowns. This reduction in Lewisham was corroborated by an assessment carried out by Imperial College London into air pollution across London. However, vehicle use has reverted to pre-pandemic levels in many places in London and unless appropriate steps are taken there is a risk of this increasing further. Additionally, although levels of NO₂ and Particulate Matter have reduced across London as a result of the Ultra-Low Emission zone and other measures, we are still a long way from meeting the new health-based World Health Organization targets for these pollutants.

Main achievements during the course of the Lewisham AQAP 2016 to 2021

Air quality and climate emergency - improving air quality as part of an integrated approach to dealing with the climate emergency.

Local government has been at the forefront of a call for sustained and significant action on climate change. The ambitious climate emergency targets and plans set by LBL, alongside organisations and bodies across the country, are among the first steps in the response to the climate and ecological crisis that has resulted from global inaction and ignoring the problems.

The impetus for change is that the demand for action on the climate crisis has come from citizens, and particularly young people, locally, nationally and internationally. This call for action is grounded in a greater understanding of the connections between the local environment, the quality of our open spaces and the air we breathe, and sustainability at a global level.

⁴ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

Meeting this challenge will fundamentally change how we live. However it does not have to be about giving things up. Instead it can enrich our lives. Taking strong action on energy, carbon and our environment means our air will be cleaner, we'll feel healthier, and we'll live in environments with green spaces, rich with diversity.

Lewisham's Climate Emergency Action Plan⁵ was approved by the Mayor and Cabinet in 2020 and includes a range of radical actions across the Council's corporate estate, housing, transport and green spaces intended to support delivery of the ambition for Lewisham to be carbon neutral by 2030.

Carbon dioxide is not, in itself, considered a primary pollutant in terms of air quality, but the main sources of carbon at a local level, particularly in urban environments, are energy use in the home and transport. These are also key determinants of local air quality.

This means that many of the actions to cut harmful pollutants, such as improving green infrastructure or moving to cleaner, renewable energy sources, will also deliver on our climate commitments. There are also strong connections between the air quality focus areas located in the north of the borough and our plans for zero carbon infrastructure, identified in our Strategy Heat Network map.

Carbon emissions in Lewisham have been falling. National data shows emissions in the borough have dropped by 100,000 tonnes in the last 4 years⁶. Our ambition is to accelerate this reduction by delivering on Lewisham's Climate Emergency Action Plan.

Recent achievements in this work include:

- Securing more than £5m external funding in 2020/21 for carbon reduction, fuel poverty and flooding projects.
- Delivery of 11 local community projects in schools and community organisations through Lewisham's Community Energy Fund, funding solar panels, lighting improvements, feasibility studies, community engagement work and a zero carbon school project.
- We are consulting on a new Core Strategy that sets standards for new developments in line with our climate ambitions.
- The energy master plan we have published provides the evidence base to decarbonise the next generation of developments in the borough.
- Switching to 100% renewable electricity to power our corporate buildings and schools, installing new recycling facilities in Laurence House and investing in improvements to lighting and heating in the building.

⁵ <https://councilmeetings.lewisham.gov.uk/mgAi.aspx?ID=26629>

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/894787/2005-18-uk-local-regional-co2-emissions.xlsx

- Changing our procurement policy to include social value in decision making on contracts above £50k and refocusing the Council’s pension fund to move away from high carbon investment.
- Lewisham’s successful Borough of Culture bid, Cultural Activism, sets out plans to inspire local people to take action on climate change in 2022.

On 11 February 2020, the Mayor of London announced that Lewisham has been awarded the title of London Borough of Culture for 2021 (due to the Covid-19 pandemic, LBL’s year as Borough of Culture was moved to 2022). LBL was awarded £1.35m funding to deliver a year-long programme of activities that will place culture at the heart of their communities and celebrate the unique character of local people and places.

Actions on climate change with the Borough of Culture will include:

- **Climate Carnival:** We will host the world’s first ‘tag’ carnival, showcasing the power of culture to highlight climate issues, increase understanding, promote debate and stimulate action within our communities.
- **Climate Commission:** We will commission a large-scale outdoor performance or installation in Lewisham designed to inspire residents into action.
- **Climate Home:** Our young people will help design, build and then perform in their own carbon-neutral theatre.
- **Artist of Change:** We will embed an artist in our Climate Emergency team to work with communities to explore creative solutions to the climate emergency.

Air Quality monitoring, trends and Core Statutory duties - Lewisham has two Air Quality Management Areas (AQMAS) ⁷ which cover most of the borough apart from the south eastern part.

In 2018, we increased our existing diffusion tube network from 36 to 50 sites and in September 2020, added 51 temporary monitoring sites for our Low Traffic Neighbourhood (LTN) project⁸.

In 2018, we increased our continuous monitoring units from three to four. These stations monitor automatically a variety of pollutants including Nitrogen Dioxide (NO₂) as detailed in the following section. With the additional Particulate Matter (PM), a monitoring site in Deptford (LW5) joins existing sites in Catford (LW1), Lewisham (LW4) and New Cross (LW2).

The previous LW1-Catford site (now LW6) measuring Nitrogen Dioxide (NO₂), was relocated in November 2021 to Laurence House, 1 Catford Road. This relocation was due ongoing refurbishment works that were likely to interfere with the monitoring equipment.

LBL contributed towards the installation of a state of the art Air Quality Supersite (HP1), at Honor Oak Park Sports Ground, managed by the Environmental Research Group at Kings College, London. This is one of only three sites in the UK and the only one in London. We will continue to look for opportunities to expand our air quality monitoring around the borough and support scientific research to better understand the problem and solutions.

⁷ <https://uk-air.defra.gov.uk/aqma/>

⁸ <https://lewisham.gov.uk/articles/news/changes-to-lewisham-and-lee-green-low-traffic-neighbourhood-announced>

Full information about our current monitors, monitoring regimes, and outcomes is available via our website⁹ along with air quality forecasts for Lewisham and London.

Nitrogen Dioxide (NO₂) is part of a group of gaseous air pollutants (nitrous oxides), and in Lewisham is primarily produced by road transport. The health effects of exposure include an irritation of airways with respiratory symptoms such as shortness of breath and cough. NO₂ inflames the lining of the lungs and can increase asthma symptoms at high concentration¹⁰.

As shown in our 2020-2022 Annual Status Reports¹¹, the results of the most current diffusion tube monitoring regime and from our four automatic stations show no ratified annual average NO₂ concentrations in excess of 40µg m⁻³. The 2021 annual mean NO₂ concentrations at automatic monitoring sites overall exhibited a continuation of the decreasing trend observed over the seven-year period between 2015 to 2021. For the sites LW1, LW2 and LW4, the average decrease was 34% for the seven-year period. Over the last eight years, annual mean NO₂ concentrations at all diffusion tube urban background sites have remained below the annual mean NO₂ AQO of 40 µg m⁻³. The locations that have exceeded the Air Quality Objective (AQO) throughout the 2014 to 2019 period have consistently been roadside sites. As shown on the following graphs (Figure 1), on average, annual mean NO₂ concentrations at both roadside and urban background monitoring locations have decreased between 2015 and 2021 by an average of 42% and 34% respectively for the seven-year period.

⁹ <https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels>

¹⁰ <https://www.blf.org.uk/support-for-you/air-pollution/types>

¹¹ <https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels>

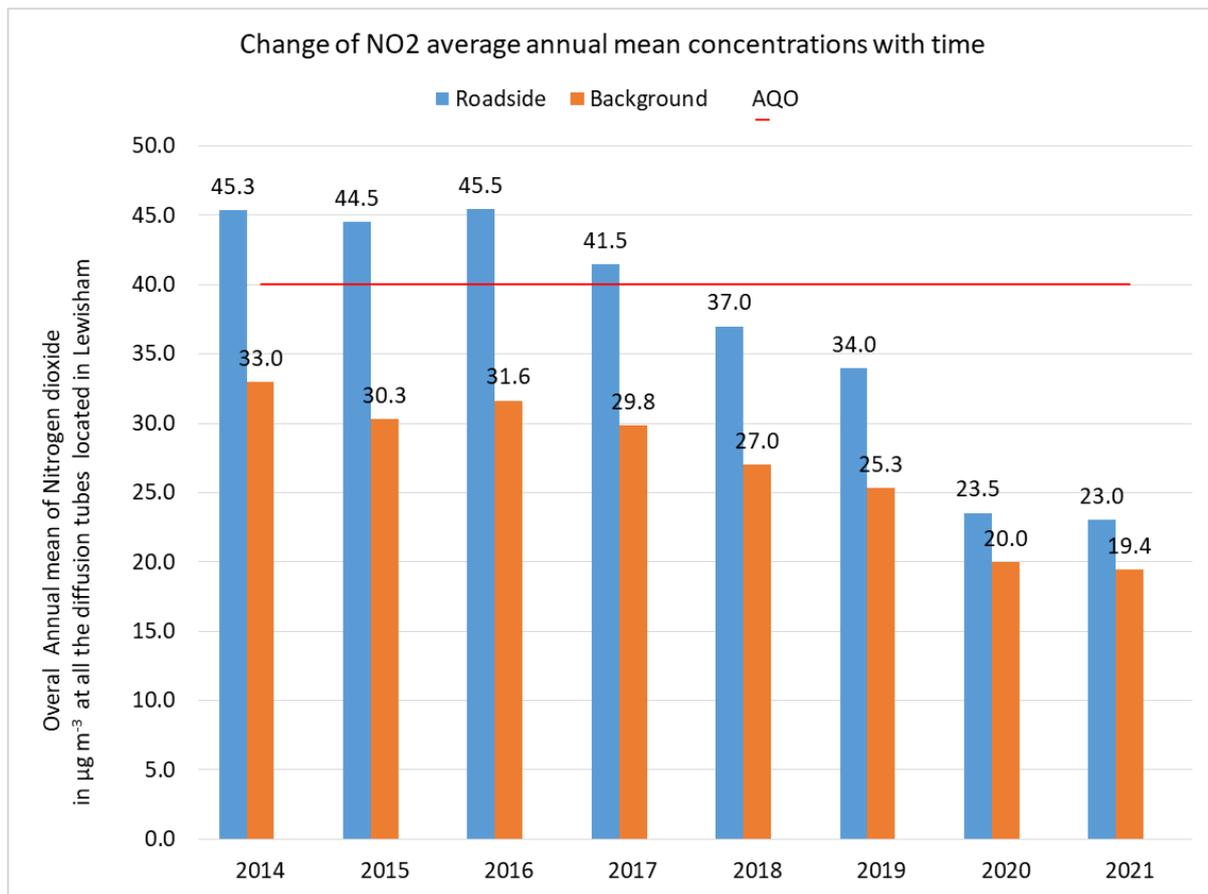


Figure 1 Trend of overall NO₂ annual mean concentration (in µg m⁻³) with time

Note: The overall NO₂ annual mean concentrations was estimated by averaging the yearly concentrations for roadside and background sites. A simple linear regression models was then used to show the relationship between the concentration of annual mean concentrations and time. The linear regressions show decrease in NO₂ with time at all the sites. The R-Square was 0.89 for overall background sites and 0.90 for roadsides. It can be seen that the largest difference between two years was the reduction in concentrations between 2019 and 2020 probable due to the impact of travel restriction imposed by the Government to limit the spread of COVID-19. The curves of individual exploratory sites are presented in the 2022 Annual Status Report available on our website. The current air quality objective (AQO) is 40 µg m⁻³.

Particulate matter (PM) refers to all liquid and solid particles in the air. It comprises a huge variety of chemical compounds and materials, some of which can be toxic. Due to the small size of many of the particles that form PM, some of these toxins may enter the bloodstream and be transported around the body, lodging in the heart, brain and other organs¹². Therefore, exposure to PM can result in serious impacts to health, especially in vulnerable groups of people such as the young, elderly, and those with respiratory problems¹³. Based on the latest evidence on the effects of PM to health¹⁴ the

¹² <https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-particulate-matter-pm10-and-pm25>

¹³ <https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-particulate-matter-pm10-and-pm25>

¹⁴ <https://laqm.defra.gov.uk/public-health/pm25.html>

UK monitors the concentration of particles less than 10 micrometres in diameter (PM₁₀) and less than 2.5 micrometres in diameter (PM_{2.5}).

PM₁₀- monitoring of PM₁₀ concentration is carried out via two automatic stations (Lewisham and New Cross) and there are no exceedances of the PM₁₀ annual mean Air Quality Strategy Objective, which is 40µg m⁻³, and monitors across Lewisham have generally shown good improvement over the last eight years. Three automatic monitoring stations within LBL measure PM₁₀. In 2021, all three sites demonstrated annual mean PM₁₀ concentrations well below the AQO of 40 µg m⁻³. Over the entire seven-year period between 2015 and 2021, all three monitoring stations showed an overall downward tendency with some fluctuations.

PM_{2.5}-these particles are harmful to human health in all concentrations. PM_{2.5} is monitored at two of our automatic stations, New Cross and Deptford, and at the Honor Oak Park site within Lewisham. No exceedance of PM_{2.5} legal limits, which are appended to this report, has been noted. However these limits are significantly less stringent than the recommended World Health Organization (WHO) guidelines.¹⁵ The Mayor of London has adopted a target to meet limits for PM_{2.5} by 2030 (i.e. annual mean concentration of 10 micrograms per cubic metre of air (µg m⁻³)) ¹⁶and asked boroughs (as detailed in the document named ‘PM_{2.5} in London: Roadmap’), to meet WHO guidelines by 2030.

In 2020, all three sites achieved annual mean PM_{2.5} concentrations below the annual mean old PM_{2.5} AQO value of 25 µg m⁻³. All concentrations recorded at New Cross have been above the WHO guidance of 10 µg m⁻³ since 2014. Lewisham Deptford (2019), and Honor Oak Park (2020) show concentrations below all objectives.

The significant increase in monitoring outlined above and the decreasing in pollutant concentrations since 2014 is testament to the commitment of LBL to increasing its understanding of air pollution, as well as demonstrating the effectiveness and impact of the LLAQM system in helping fulfil our statutory duty to work with all stakeholders to tackle air quality in the borough.

Recent Greater London Authority analysis outlines the success of policies such as the central London Ultra Low Emission Zone (ULEZ), cleaner buses and electric taxis¹⁷. However, there is still a long way to go until Londoners breathe clean air as tens of thousands continue to live in areas with illegally polluted air¹⁸ and 99 per cent of London, and Lewisham, still exceeds World Health Organization recommended limits¹⁹. Local action is required to complement regional measures and target NO₂

¹⁵ <https://www.euro.who.int/en/health-topics/environment-and-health/air-quality/activities/update-of-who-global-air-quality-guidelines>

¹⁶ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/pm25-london-roadmap-meeting-who-guidelines-2030#>

¹⁷ <https://www.london.gov.uk/press-releases/mayoral/dramatic-improvement-in-londons-air-quality>.

¹⁸ <https://www.london.gov.uk/press-releases/mayoral/dramatic-improvement-in-londons-air-quality>

¹⁹ [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health#:~:text=%22WHO%20air%20quality%20guidelines%22%20estimate,related%20deaths%20by%20around%2015%25](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health#:~:text=%22WHO%20air%20quality%20guidelines%22%20estimate,related%20deaths%20by%20around%2015%25).

pollution hotspots. Furthermore, although Lewisham and London are meeting legal PM_{2.5} limits, we are still a long way off meeting the WHO's health-based limits for PM_{2.5}. Concerted action is required across all levels of Government to achieve the Mayor's goal of meeting the WHO limits for PM_{2.5} by 2030.

Pollutants, such as nitrogen dioxide (NO₂) and particulate matter (PM), are now known to be non-threshold – i.e. there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects²⁰.

New WHO Global Air Quality Guidelines (AQGs)²¹ published in September 2021 provides clear evidence of the damage air pollution inflicts on human health, at even lower concentrations than previously understood. The guidelines recommend tighter air quality levels to protect the health of populations, by reducing levels of key air pollutants, some of which also contribute to climate change. Whilst not legally-binding, like all WHO guidelines, AQGs are an evidence-informed tool for policy-makers to guide legislation and policies, in order to reduce levels of air pollutants and decrease the burden of disease that results from exposure to air pollution worldwide. Conscious that this will be a difficult task for many countries and regions struggling with high air pollution levels, WHO has proposed interim targets (IT) to facilitate stepwise improvement in air quality and thus gradual, but meaningful, health benefits for the population.

Air quality in Lewisham does currently breach those guidelines, however air quality is largely within the EU legal limits which the UK currently adheres to. But most of the Lewisham measured annual concentrations of NO₂ for example are above the WHO Air Quality Guideline of 10 µg m⁻³. Pending the new UK air quality strategy, due at the end of 2022, which should include new UK recommended guidance, LBL will be designing a timescale of achieving each of the interim targets, which levels for (NO₂) are 40,30, 20 µg m⁻³ for interim targets 1, 2 and 3. An assessment of the NO₂ and PM Concentrations against the new AQGs and targets have been appended to this plan for your own assessment and review.

Emissions from developments and buildings: We continue to regulate, help manage and reduce emissions from developments and buildings by using planning powers to enforce air quality measures, cut emissions, increase energy efficiency and by the adoption of Planning Policy that encourages car-free developments.

Lewisham is part of the Pan London Non Road Mechanical Machinery (NRMM) project which aims to reduce emissions from construction sites. Almost all major planning applications are now subject to Non Road Mobile Machinery, air quality and dust conditions.

Public Health and Awareness Raising: We carry out actions to reinforce our ongoing political commitment to air quality and the importance of our engagement in promotion of better air quality and raising health awareness.

Several actions have been carried out through the quarterly Air Quality Working Groups, with Cllr Louise Krupski and Cllr Sophie McGeevor, former Cabinet member for environment, in attendance, and quarterly Strategic Air Quality Board with heads of service in attendance.

²⁰ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

²¹ <https://apps.who.int/iris/handle/10665/345329>

One example is the design of the School Air Quality Action Plan. Also our Annual Status report has been taken to the Health Protection Board for sign off, in addition to the Departmental Management Team (DMT). This is now part of our corporate governance.

Lewisham's Public Health team is leading on promotional work, through the medical profession, to raise awareness among those with respiratory issues about the effects of poor air quality. Lewisham was one of the first boroughs to launch its 'Lewisham Air App'. It is hoped that GPs and respiratory nurses will encourage use of the App among patients with Chronic Obstructive Pulmonary Disease (COPD) and asthma and also to those who provide care for residents with such conditions. The Lewisham Air App allows residents to plot low pollution routes, receive air pollution notifications and monitor air quality and air pollution in real-time.

We will use several readily available resources, such as GLA pollution alerts, airText and Imperial College's London Air webpage, to raise awareness of the health impacts of air quality and monitor these impacts more closely.

We encouraged everyone living, working or visiting the borough to help reduce air pollution across the borough to sign our clean air pledge and commit to do at least one of these actions to help improve air quality:

- Walk, cycle or use public transport instead of driving your car
- Download the Lewisham Air app to get air quality news and alerts
- Make your next car an electric or hybrid, or join a car club
- Walk your children to school
- Switch off your car engine when you are stationary, loading or waiting
- Use approved appliances and fuel for heating
- Avoid using the car and where possible use alternative ways of getting around the borough
- Walk and make the most of cleaner and greener more pleasant routes and
- Encourage parents to become an air quality champion in their child's school.²²

Like most London boroughs, vehicle idling is an issue in Lewisham. Several campaigns have been launched to reduce unnecessary engine idling by raising awareness of how harmful toxic pollution can be to human health²³. A London-wide anti-idling campaign was launched in 2019 and on 22 February 2021 there was the launch of a new London-wide anti-idling marketing campaign "Engines Off. Every Stop". These campaigns are part of the Idling Action London project, funded through the Mayor's Air Quality Fund.

On 18 September 2019, the Mayor and Cabinet agreed to introduce a traffic management order (TMO) that allows enforcement action against drivers who are caught idling. This applied to all roads in the borough and started in January 2020. From this date, Civil Enforcement Officers are able to enforce where drivers are idling their vehicles through Penalty Charge Notice (PCN)²⁴.

²² <https://lewisham.gov.uk/myservices/environment/air-pollution/register-your-interest-in-becoming-an-air-quality-champion-at-your-child-s-school>

²³ <https://idlingaction.london/>

²⁴ <https://lewisham.gov.uk/articles/news/our-drive-to-improve-air-quality-forges-ahead-with-new-measures-to-tackle-idling-vehicles>

Lewisham has also continued raising awareness on this important issue through school programmes and encourage everyone living, working, and visiting Lewisham to reduce car usage and make walking, and cycling and public transport a preferred choice of travel. Cllr Samantha LaTouche has been appointed as our Air Quality Champion, and is actively engaging with the community, schools and construction companies to help reduce air pollution across the borough.

Examples of engagement:

- The Evelyn Street Corridor Forum
- Clean Air Days
- National Clean Air Summit
- Deptford Folk
- Lewisham People's Day
- School Superzones Project
- Anti-idling school events
- GLA meetings
- Westminster Briefing on Air Quality
- Meetings around specific schemes implemented by the council to reduce air pollution
- The Lee Green Assembly
- Implementation of the Lewisham and Lee Green Low Traffic Neighbourhood (LTN)
- Events around the future of a traffic-free city and
- Meetings for the Dartford consolidation centre with Cross River Partnership.

School actions: We have been working with the GLA, local head teachers, parents and all relevant stakeholders to identify actions to reduce exposure to poor air quality around schools. We have focused on actions around schools, looking particularly at sustainable transport commitments and idling action including:

- We compiled a draft School Air Quality Action Plan due to be adopted and are working with local head teachers and parents to reduce air pollution around schools.
- We appointed Air Quality Champions. These volunteers are promoting the key message of anti-idling and helping run anti-idling events at schools.
- TFL's STAR (Sustainable Travel Accredited and Recognised) status is awarded to schools that show a commitment to their school travel plan²⁵. Almost 60 secondary schools were awarded Gold²⁶ status between in 2017 and 2019.
- Fifty London School audits were funded with £250,000 from the Mayor's Air Quality Fund. The Mayor also invested £250,000 to pilot the audit concept in 20 nurseries in London's most polluted areas²⁷. Following the audits at school and nurseries, recommendations were made to reduce emissions and exposure. In Lewisham this work included three schools audits (Deptford Park Primary School, Haseltine Primary School and St James Hatcham Primary

²⁵ <https://lewisham.gov.uk/myservices/roads-and-transport/sustainable-transport/setting-up-a-school-travel-plan>

²⁶ <https://stars.tfl.gov.uk/About/Accreditation>

²⁷ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/mayors-school-air-quality-audit-programme>

School) and two nurseries audits (NAQA Clyde Nursery School and NAQA Kay Rowe Nursery School). As part of the scheme, the Council helped to install green 'living walls' around these schools.

- Implementing a programme of School Streets (closing roads to traffic at school drop off and pick up times) ²⁸. This includes physical measures introduced to the street to discourage car use during school drop off and pick up times. The scheme also aims to tackle congestion, improve air quality at the school gates, make it easier and safer to walk and cycle to school and create a friendlier and calmer environment for everyone.
- Other school projects include green infrastructure, cleaner transport and trialling an indoor air filtration system.

Cleaner Transport. A range of actions have been implemented in the last few years, including the creation of more and improved pedestrian spaces on high streets, enhanced cycle routes, more cycle parking, school streets, a low traffic neighbourhood and other traffic reduction measures, speed compliance measures, bus priority schemes, electric vehicle charging points, cargo bike schemes, car free days, and a comprehensive road safety education programme.

These measures have encouraged behavioural change away from car use and towards more sustainable or efficient forms of transport, such as walking and cycling, or cargo cycles for movement of goods.

However, it is recognised that not every journey can be made on foot or by bike, and where car use is necessary, a shift to electric vehicles is encouraged through the ongoing expansion of our charging network. There have also been actions around improving parking policy to provide incentives for low emission vehicles.

Several Local Implementation Plan (LIP3) projects undertaken in Lewisham and in our Air Quality Focus Areas are briefly summarised in this section and in section 1 of this plan. These include:

- Adoption and publication of the Low Emission Vehicle Charging Strategy to ensure that everyone in the borough is no further than 500m from an electric vehicle charge point by 2022. Then expansion of the electric vehicle charging points throughout the borough to 200 plus.
- Introduction of 20 mph speed limit on all Air Quality Focus Areas and most of Lewisham's major roads
- Adoption and publication of our parking policy in the borough that will see the most polluting vehicles paying the most for parking permits
- Reduction of emissions in our fleet vehicle selection
- Pedestrianisation of Prince Street and Scawen Road (outside Francis Drake School) as well as four Copenhagen crossings on Crook Road, Avignon Road, Kezia Street and Etta Street and;
- Introduce traffic reduction and increase walking and cycling through the Deptford Parks Liveability Neighbourhood, Healthy Neighbourhoods, Cycleway and other planning development initiatives.

A variety of measures have been introduced in response to the COVID pandemic to help support social distancing and create a safer environment for those travelling on foot or by bike. This includes the

²⁸ <https://lewisham.gov.uk/my-services/roads-and-transport/closing-roads-to-traffic-at-school-drop-off-and-pick-up-time-school-streets>

creation of more space for pedestrians on high streets, the installation of the borough's first parklet, a low traffic neighbourhood, a number of other modal filters and school streets. We have seen many residents take advantage of the quieter conditions during lockdown and reduce the use of their cars. We believe that other improvements being made will encourage people to continue to make more journeys by foot or bicycle.

The School Streets initiative has seen physical measures introduced to these streets to stop car use during school drop off and pick up times. The scheme also aims to tackle congestion, improve air quality at the school gates, make it easier and safer to walk and cycle to school and create a friendlier and calmer environment for everyone. So far, 47 school streets have been put in place, with more to follow, subject to funding.

Delivery servicing and freight. We are managing the impact on air quality of delivery services, with the re-organisation of freight delivery, prioritising loading for ultra-low emission delivery vehicles and making progress on the Council's own move to low emission vehicle use.

Air Quality Focus Areas. The 2016-2021 plan included additional actions around specific project within areas of high air pollution, with funding from the Department for Environment, Food and Rural Affairs (Defra)²⁹ and Mayor's Air Quality Fund (MAQF)³⁰.

LBL is part of the Cross River Partnership (CRP) coordinated series of Clean Air Villages (CAV)³¹. This Defra funded project promotes air quality-related behaviour change from a wider community perspective, including residential and commercial transport and travel.

Some of the most recent projects undertaken as part of CAV include improving air quality through engagement with local stakeholders, such as healthcare providers, businesses and community groups around Deptford High Street.

In March 2021, Defra awarded further funding to London authorities, including Lewisham, for a CAV engagement and behaviour change project that will implement a range of freight solutions.

Greener Environment: A new Strategy for Parks & Open Spaces in Lewisham was launched at the beginning of 2020 following consultation.

The strategy prioritises healthy streets and green spaces and in particular areas where people choose to walk, cycle and use public transport in preference to driving.

We are investing in green spaces across the borough including new green spaces such as Charlottenberg Park in New Cross, as well as the transformation of Beckenham Place Park and the introduction of the Greening Fund that allows local community groups to bid up to £40,000 for green infrastructure.

²⁹ <https://www.gov.uk/government/collections/air-quality-grant-programme>

³⁰ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/mayors-air-quality-fund>

³¹ <https://crossriverpartnership.org/projects/#current>

On 11 March 2020, Mayor and Cabinet agreed four priorities on which projects would have to address to qualify for the Neighbourhood Community Infrastructure Levy (NCIL) Community borough wide pot. Some of the grants allocated to community projects to improve Air Quality, including green infrastructure.

This AQAP is an opportunity to build on the success of our achievements and make Lewisham a cleaner, healthier, and greener borough.

The health impacts of pollution

Air pollution is associated with a number of adverse health impacts and it is recognised as a contributing factor in the onset of heart disease and cancer³². Additionally, air pollution particularly affects some of the most vulnerable in society: children and older people, and those with heart and lung conditions.

The following facts highlight the importance of dealing with air pollution and risk to human health and the environment as a whole:

- Despite significant improvements, levels of air pollution in London are still high for many Londoners and a recent study by Imperial College London, commissioned by the GLA, found that in 2019, toxic air contributed to the deaths of more than 4,000 Londoners³³.
- A recent publication³⁴ by Public Health England revealed that there is also often a strong correlation with equalities issues because poor air quality is linked with higher social deprivation. Research carried out by Imperial College London showed that there were higher concentrations of particulate matter and nitrogen dioxide in the most deprived 20% neighbourhoods in England³⁵. The negative health impacts of poor air quality fall disproportionately on the most vulnerable communities, with effects being exacerbated for the young, the elderly, the most deprived and those from black, Asian, and minority ethnic (BAME) groups. During the course of this plan, the information related to the role of air pollution in health and inequalities will be updated with the new data contained in PHE's edition of health matters³⁶.
- Recent research, based on the latest London Atmospheric Emissions Inventory, shows that every area in the capital exceeds World Health Organisation (WHO) limits for a damaging type

³² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4112067/>

³³ <https://www.imperial.ac.uk/news/213273/tackling-londons-pollution-will-increase-life/>

³⁴ (PHE, 2020) *Review of interventions to improve outdoor air quality and public health: Principal interventions for local authorities*

³⁵ <https://www.imperial.ac.uk/news/163408/ethnic-minorities-deprived-communities-hardest-pollution/>

³⁶ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution#:~:text=matters-air-pollution-,Summary,leading%20to%20reduced%20life%20expectancy.>

of particle known as PM_{2.5}. Children living near roads with heavy-duty vehicle traffic have twice the risk of respiratory problems as those living near less congested streets³⁷.

- The UK Health Forum and Imperial College London, in collaboration with and funded by Public Health England (PHE), developed a modelling framework and estimated that a 1 µg m⁻³ reduction in fine particulate air pollution in England could prevent around 50,900 cases of coronary heart disease, 16,500 strokes, 9,300 cases of asthma and 4,200 lung cancers over an 18 year period³⁸.
- In 2010, the Committee on the Medical Effects of Air Pollutants (COMEAP)³⁹ speculated that it is reasonable to consider that air pollution may have made a contribution to the earlier deaths of up to 200,000 people in the UK (the number dying of cardiovascular causes) with an average loss of life of about two years. Using an approach of undertaking several individual exploratory calculations in 2018, the range of estimates of the mortality burden of the air pollution mixture (based on associations with PM_{2.5} and NO₂) in 2013 in the UK is an effect equivalent to 28,000 to 36,000 deaths at typical ages, associated with a loss of 328,000 – 416,000 life years⁴⁰.
- Air pollution is estimated to reduce life expectancy of every person in the UK by an average of 7-8 months with estimated equivalent health costs of up to £20 billion each year⁴¹.
- According the public health England, epidemiological studies have shown that long-term exposure to air pollution (over several years) reduces life expectancy, mainly due to cardiovascular and respiratory causes and from lung cancer. The annual mortality burden of

³⁷ *Childhood Cancer and Traffic-Related Air Pollution Exposure in Pregnancy and Early Life*. Heck et al. (2013) *Environ Health Perspect* 121:1385-1391

³⁸ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution#:~:text=matters-air-pollution-,Summary,leading%20to%20reduced%20life%20expectancy.>

³⁹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/304641/COMEAP_mortality_effects_of_long_term_exposure.pdf

⁴⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf

⁴¹ *Air Quality Information for Public Health Professionals – City of London, Greater London Authority, November 2012*

human-made air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths⁴².

- In 2010, the Environment Audit Committee considered that the cost of health impacts of air pollution was likely to exceed estimates of £8 to 20 billion⁴³. Cost estimates using the Air pollution: a tool to estimate healthcare costs⁴⁴ will be used to estimate the cost for Lewisham during the cost of this plan.
- COMEAP's current estimate of the mortality burden of air pollution in the UK using a coefficient based on PM_{2.5} (COMEAP, 2010) is an effect equivalent to nearly 29,000 deaths and an associated loss of 340,000 life years across the population in a single year. Given the correlation between pollutants, this estimate may include effects of other air pollutants, as well as PM⁴⁵.
- In January 2021, the Mayor joined a cross-part group of UK mayors in calling on Government to adopt World Health Organization (WHO) targets for fine particulate matter (PM_{2.5}) as legally binding air quality limits to be met no later than 2030. Some 40 million people in the 115 largest cities in the European Union (EU) are exposed to air exceeding WHO quality guideline values for at least one pollutant⁴⁶.

Ella Adoo-Kissi-Debrah legal case

Ella lived with her mother and two siblings approximately 25 metres from the South Circular. At the time of her death, on 15 February 2013, she attended a local primary school. A 2014 inquest initially found that the cause was acute respiratory failure and severe asthma.

Following the publication of new evidence on local pollution levels and the campaigning efforts of Ella's mother Rosamund, the High Court granted a new inquest. A second inquest ran in 2020 and the Coroner concluded that exposure to excessive air pollution contributed to Ella's death. Ella is thought to be the first person in the world to have her death directly linked to exposure to air pollution. Rosamund Adoo-Kissi-Debrah is a prominent campaigner on air quality and is well known in her local community and across the capital.

⁴²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938623/Review_of_interventions_to_improve_air_quality_March-2019-2018572.pdf

⁴³ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution#:~:text=matters-air-pollution-,Summary,leading%20to%20reduced%20life%20expectancy.>

⁴⁴ <https://www.gov.uk/government/publications/air-pollution-a-tool-to-estimate-healthcare-costs>

⁴⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf

⁴⁶ http://press.iarc.fr/pr213_E.pdf

The Coroner's conclusion has set a legal precedent that should lead to an appropriate enforcement of air quality guidelines and highlighted the fact that air pollution is affecting the health of millions of people worldwide every day. In April 2021, the Coroner published a Prevention of Future Deaths Report⁴⁷ that set out three areas of concern, with matters addressed to different levels of government as well as health and care organisations.

Lewisham Council was asked to address one of the three matters of concern, raised in the Prevention of Future Deaths Report, focusing on public awareness of information about national and local pollution levels.

In response Lewisham Council has committed to key actions:

- **An expansion of monitoring capacity:** Automatic monitoring stations can now be supplemented by lower cost monitors through the GLA's Breathe London programme. The new monitors in Lewisham will feed into a London-wide network of sensors providing greater data and coverage and will help to contribute to improved public awareness of air pollution across the capital.
- We are also in the process of adding more diffusion tubes, with up to another 75 monitors in total (both diffusion tubes and the new PM_{2.5} monitors) planned for installation by October 2027. It is important to note that these sensors will not replace the highly accurate reference-level automatic monitors which are critical for calibrating the lower cost sensors, measuring long term trends, ensuring accuracy, and for legal reporting against air quality objectives.
- **WHO-specific reporting:** As part of our commitment to provide additional and meaningful information around air quality levels, Lewisham Council will commit to identifying the WHO recommended levels alongside the current UK limits when publishing air quality data.
- **Raising awareness:** Lewisham Council is formulating a plan which will include a multi-media approach: promoting air quality monitoring tools via social media and local advertising; ensuring information about air quality is positioned prominently on the websites of Lewisham Council and South East London Clinical Commissioning Group, and sharing information via social media and our residents' newsletter. This activity started on Clean Air Day on 17 June 2021.

The 2022-2027 AQAP has seven areas for action:

- (1) **Monitoring and other core statutory duties:** Maintaining monitoring networks is absolutely critical for understanding where pollution is most acute, and what measures are effective to reduce pollution and is one of a number of statutory duties
- (2) **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.
- (3) **Public health and awareness raising:** Increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution.
- (4) **Delivery servicing and freight:** Vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions.
- (5) **Borough fleet actions:** Our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example.
- (6) **Localised solutions:** These seek to improve the environment of neighbourhoods through a combination of measures; and

⁴⁷ <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

- (7) **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 cars) as far as possible.

Within the above areas the GLA has identified the following nine key priorities that all London Boroughs should be focussing on in addition to other locally derived priorities and/or others from the Matrix provided.

1. Public health and awareness raising: Reducing pollution in and around schools and extending school audits to other schools in polluted areas. We will work with Public Health in awareness raising, through school projects and establishing links with local businesses,
2. Enforcing the Non-Road Mobile Machinery (NRMM) Low Emission Zone,
3. Promoting and enforcing Smoke Control Zones,
4. Promoting and delivering energy efficiency retrofitting projects in workplaces and homes,
5. Supporting alerts services such as Lewisham application and promoting the Mayor's air pollution forecasts,
6. Installing Ultra-Low Emission Vehicle (ULEV) infrastructure. LBL will work with partners, i.e., Blue Point and TfL to continue increasing the number of electric vehicle charging points accessible to residents and businesses within the borough,
7. Improving walking and cycling infrastructure: we will build on the work already undertaken in relation to encouraging cycling and walking,
8. Regular Car Free days/temporary road closures in high footfall areas and
9. Reducing emissions from Council fleets.

To achieve our chosen actions we will work in partnership across the Council with neighbouring authorities, with partners such as the GLA, TfL and DEFRA, with community groups and volunteering organisation to effectively use the following local levers to tackle air quality issues within our control including:

- Implement joint working with public health professionals.
- Delivering transport projects that enable walking and cycling through the LIP.
- Continue to utilise the planning system to drive the air quality agenda via conditions and enforcement where appropriate.
- Encourage the use of lower emission vehicles by the Council, businesses, and residents.
- Measures at a wider scale and investigate options to make efficient use of resources by delivering joint actions, such as the London wide NRMM and Idling projects.

We will work hard to engage with stakeholders and communities who 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 continuing partnerships (as well with new partners) as we deliver this new action plan over the coming five 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 London Borough of Lewisham's influence.

RESPONSIBILITIES AND COMMITMENT

This AQAP was prepared by the *Environmental Protection Team* with the support and agreement of the following officers and departments:

Role/Team/Department	Officer Job Title
Public Realm	Director of Public Realm
Environmental Health	Head of Environmental Health
Environmental Protection	Environmental Protection Manager
Communication teams	Communications manager, Strategy and Communications
	Media Officer, Strategy
Crime Enforcement Regulation (CER)	Crime enforcement & regulation Service Manager, crime enforcement & regulation service
SGM Fleet and Passenger, Environment	Manager SGM Fleet and Passenger, Environment
Housing Private Sector (Environmental Health Residential)/Private Sector Housing (Grants)	Private Sector Housing Manager
IT and Analyst & Systems Team	Web Officer
Parking	Manager parking enforcement
	Principal Parking Engineer
	Electric Vehicle Infrastructure Project Manager , Regeneration and Place
	Development officer, Regeneration and Place
Parks & Regeneration	Ecological Regeneration and Open Space Policy Manager, Environment
Planning	Director of Planning
	Development Management - Service Group Manager, Planning
	Principal Policy Officer, Planning
	Major and Strategic Projects Manager – Planning
Procurement and Commercial Services	Procurement and Commercial Services Manager, Corporate Resources
	Senior Procurement and Contracts Officer, Corporate Resources
	Local Labour and Business Scheme Project Officer, Strategy
Public Health	Public Health Strategist
	Director of Public Health
Climate Resilience Team	Climate Resilience Manager
Sustainable Transport	Road Safety and Sustainable Transport Manager
	School Sustainable Transport Officer, Environment
Transport	Head of Strategic Transport
	Policy & Development Manager, Public Realm
	Senior Transport Planner

	Cycling & Walking Programme Manager, Public Realm
	Principal Engineer, Public Realm
	Parking Engineer, Public Realm
Community & Cultural Development	Third Sector Manager, Communities, Partnerships & Leisure Community Services

1 Summary of current air quality in London Borough of Lewisham

The UK Clean Air Strategy, released in 2019 (revision is due end 2022), provides the strategic framework for air quality management in the UK. It contains national air quality standards and objectives established by the Government to protect human health. The Strategy objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.

LBL is meeting the current objectives for Particulate Matter (PM₁₀) and is meeting all of the national objectives other than for Nitrogen Dioxide (NO₂). For PM_{2.5} the legal objective is not as strict as the World Health Organisation (WHO) recommended guideline limit. In the London Environment Strategy, the Mayor has committed to meeting the WHO health-based guideline limits across London by 2030. LBL exceeds WHO guideline PM_{2.5} limits, and a key area of focus will be to meet this 2030 target.

On 25 January 2021, City Hall published the results of a study commissioned from Imperial College London's Environmental Research Group which found that the Mayor's air quality policies and wider improvements in air pollution will increase the average life expectancy of a child born in London in 2013 by six months.

Despite significant improvements, levels of air pollution in London are still too high for many Londoners and the study found that in 2019 toxic air contributed to the deaths of more than 4,000 Londoners. This shows that there is still vital work to do to improve London's air quality. This is why the Mayor is committed to expanding the Ultra-Low Emission Zone in October this year⁴⁸.

The new WHO Global Air Quality Guidelines (AQGs)⁴⁹ published on 22 September 2021 recommend new tighter air quality levels to protect the health of populations, by reducing levels of key air pollutants, some of which also contribute to climate change. Whilst not legally-binding, like all WHO guidelines, AQGs are an evidence-informed tool for policy-makers to guide legislation and policies, in order to reduce levels of air pollutants and decrease the burden of disease that results from exposure to air pollution worldwide.

Addressing PM_{2.5} in Lewisham

⁴⁸ The report is available on the GLA website here: <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/health-burden-air-pollution-london>

⁴⁹ <https://www.who.int/news/item/22-09-2021-new-who-global-air-quality-guidelines-aim-to-save-millions-of-lives-from-air-pollution>

LBL supports the Mayor's commitment to meet the World Health Organisation (WHO) guidelines for PM_{2.5} which is more ambitious than the goal in the new national Clean Air Strategy. Currently PM_{2.5} limit levels in UK are working towards the WHO Global Air Quality Guidelines which is 10 µg m⁻³. In 2021, the WHO has introduced a target 5 µg m⁻³ annual mean concentration. Conscious that this will be a difficult task for many countries and regions struggling with high air pollution levels, WHO has proposed interim targets (IT) to facilitate stepwise improvement in air quality and thus gradual, but meaningful, health benefits for the population. The previous WHO concentration of 10 µg m⁻³ is now an interim target to be met by 2030 as suggested by the Mayor.

Unlike other pollutants, such as nitrogen dioxide, a large percentage of PM_{2.5} in London comes from regional, and often trans-boundary (non-UK) sources. Therefore, the powers to tackle these emissions involves London, the UK and other European governments which can make it more difficult to address with direct measures. The Mayor of London stated that approximately half of PM_{2.5} in London is from sources outside the city⁵⁰. The main sources of PM_{2.5} emissions in London are from tyre and brake wear, construction and wood burning.

LBL supports the Mayor's objective to work with European institutions, other European cities, and city networks to ensure that trans-boundary pollution affecting London is minimised and ensuring strong source control measures and regulations are adopted at EU level. The following interventions have been welcomed within Lewisham:

- Real-world driving emissions testing, type-approval process arrangements, tyre and brake wear, and new emission standards (for example Euro 7).
- The introduction of the central London ULEZ and cleaning up the bus and taxi fleets.
- Encourage and promote the reduction of the number of trips made by road and encourage walking, cycling and public transport where possible, as laid out in the Mayor's Transport Strategy.
- Reduce emissions from biomass burning (including domestic wood burning); construction, with emissions from NRMM; and from cooking (including commercial cooking); and
- Government policies will greater ability to reduce PM_{2.5} emissions from road transport as detailed the London Environment Strategy and Mayor's Transport Strategy⁵¹.

The Government's goal is to reduce the number of people exposed to PM_{2.5} above the WHO target by 50% by 2025. If achieved this would still leave many Londoners and Lewisham's residents exposed to the health effects of high levels of pollution.

LBL will focus on reducing and monitoring PM_{2.5} over the course of this Air Quality Action Plan. Our intention is still to work with other authorities towards meeting the 10 µg m⁻³ annual mean concentration by 2030 and to adhere to any legally binding targets to reduce all UK concentrations of PM_{2.5} to WHO recommended levels by 2030, should these be implemented. The new guideline of 5 µg m⁻³ will be re-considered when the new UK Air quality strategy has been published.

LBL, along with other London boroughs, will work to set out how this target can be reached and provide details setting out how the most vulnerable people will be protected.

⁵⁰ <https://www.london.gov.uk/press-releases/mayoral/every-londoner-is-exposed-to-dangerous-toxic-air#:~:text=Around%20half%20of%20PM2.,wear%2C%20construction%20and%20wood%20burning.>

⁵¹ Mayor of London, (2018); Mayor's Transport Strategy.

The combination of actions and policies currently in force, or coming into force, laid out in the AQAP will bring about a reduction of PM_{2.5} across Lewisham.

Some of the actions due for consideration include for example:

- Actions within the Clean Air Act 1993. This enables local authorities to tackle smoke emissions from chimneys of buildings, fixed boilers and industrial plants. Further actions will be considered to target domestic combustion, which is the major source of PM_{2.5}. We will examine introducing greater powers to declare and enforce smoke control areas. Tighter minimum emission standards for burning stoves and a ban on domestic burning in areas with high PM_{2.5} levels will also be considered.
- As part of future development planning, we will look to locate sensitive receptors like hospitals, schools and care homes away from main roads where pollution is high.
- Increasing PM_{2.5} monitoring around schools and other vulnerable receptors like hospital and care homes. If funding opportunities arise for new air quality monitors, priority will be given to PM_{2.5}.
- LBL commissioned a new reference monitor in Deptford that will be measuring PM_{2.5}, increasing our PM_{2.5} reference monitoring locations. LBL has been monitoring PM_{2.5} on New Cross Road since 2015.

A combination of complementary initiatives is key to dealing with the short and longer-term PM_{2.5} on-air quality in Lewisham. However, initiatives in with evidence of positive impacts on air quality in the short term, such as increasing parking charging fees, idling enforcement, green infrastructure and traffic management should be given priority. LBL will consider implementing a parking policy that will allow higher parking fees to be charged for vehicles that cause more pollution.

DEFRA announced during a meeting in January 2021 their intention to publish a Clean Air Strategy with updated air quality objective that align with the new WHO AQGs published. A local authority guideline document to address PM_{2.5} will be published in due course. LBL will adhere to these new Guidance documents when published.

Air Quality Modelling Data

London wide

The GLA published new data ⁵² on 16 December 2021 showing dramatic improvements in London's air quality across the capital since 2016, confirming that measures implemented by the Mayor and different stakeholders have helped reduce exposure to air pollution across London.

The data shows:

- In 2019, 84 % of major roads in London met the legal limit for NO₂, compared to 46% in 2016 and just 37% in 2013.
- There has been a significant reduction – approximately 22% – in NO₂ across the whole of Greater London from 2016 to 2019 with notable improvement in areas meeting the legal limit for NO₂ in 2019.

⁵² <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

- In particular, huge progress has been made on London's 'red routes' with 70 per cent of the Transport for London Road Network meeting the legal limit for NO₂ in 2019, increased from 29 % in 2016 and just 21 % in 2013.
- The PM_{2.5} concentration maps show that there was a 19% reduction in PM_{2.5} across the whole of the city since 2016 with many parts of outer London meeting the WHO interim guideline of 10µgm⁻³ for the first time.
- Nearly 1.2 million Londoners now live in areas meeting the WHO interim guideline of 10 µgm⁻³ in 2019. It had been previously estimated that no Londoners were living in areas meeting this target in 2016.
- The predicted concentrations of NO₂ are all below the AQO for NO₂ of 40 µg m⁻³, however, the predicted concentration of PM_{2.5} are all above the AQO objective of 10 µg m⁻³ in all our educational institutions.
- The LAEI 2019 will also include borough level data to be published in early 2022 and forecast emissions and concentration maps for 2025 and 2030 to be published in spring 2022.
- The recent 2019 GLA modelling air quality data published in 2022 now shows all concentration of NO₂ below the air quality objective of 40µg m⁻³ around all Lewisham Schools. However concentrations of PM_{2.5} are above the WHO guideline of 10µg m⁻³

The fact that such significant progress has been made reducing PM_{2.5} concentrations adds to the growing evidence and cross-party consensus that, as a minimum, the interim WHO guideline should be included in the secondary legislation of the Environment Act as a new legally binding target for PM_{2.5}.

Lewisham Modelling Data

Air Quality Monitoring Date (AQMA) is generally reported at borough level, and there is often a lack of monitoring for air pollution 'hotspots' or Air Quality Focus Areas (AQFA's). The most effective way to use monitoring information is to compare data recorded over a number of years at the same site. To compare borough-wide pollution concentrations it is best to refer to the London-wide concentration modelling in the London Atmospheric Emissions Inventory (LAEI).⁵³

Using the base line of 2013, the LAEI carried out modelling work to produce the predicted 2020, 2025, and 2030 annual mean NO_x, NO₂, PM₁₀ and PM_{2.5} concentrations on a 20m x 20m basis (or Grid) for the whole of London.

Emissions for 2010 and 2013 were recalculated, using the latest data sources (including emission factors and activity data) and methodology, detailed in the LAEI website, to produce the LAEI 2016 maps⁵⁴.

The LAEI uses air pollution emission estimates from a wide range of sources, including transport, industrial, domestic, and commercial combustion, and uses the most up-to-date activity data, emission factors and projection factors.

⁵³ <https://data.london.gov.uk/air-quality/>

⁵⁴ <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016>

The LAEI 2016 is the latest version presented in this report and replaces previous versions of the inventory. Emissions estimates of key pollutants (NO_x, PM₁₀, PM_{2.5} and CO₂) by source type are included for the base year 2016.

It is anticipated that the current version of the LAEI figures presented in the following section of this report will be updated with new Lewisham specific figures due at the end of 2022.

Figure 2 shows the 2016 LAEI baseline annual mean NO₂ concentrations in Lewisham. The changes in colours show how the pollution gradient changes, with distance, away from the heavier traffic.

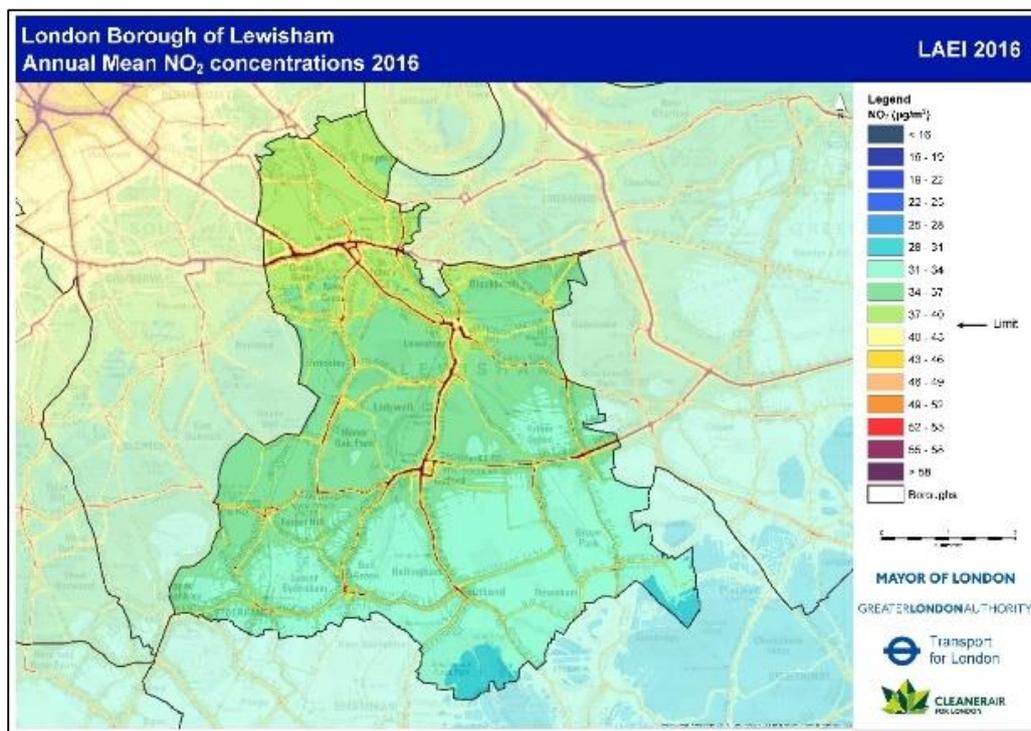


Figure 2 Modelled map of annual mean NO₂ concentrations (from the LAEI 2016)

Note: At the time of writing this plan, no updated version of this figure was available on the LAEI website for use. The new data is due before the end of 2022 and this plan will be updated accordingly.

The map shows that much of the borough has pollution levels below the target limit. The highest concentrations of NO₂ which breach the legal limits (as shown in black to red colouring) are found on the busiest main roads in the borough. However pollution levels quickly reduce with distance from the pollution source.

Figures 3 and 4 shows (3) the 2016 LAEI baseline annual mean PM₁₀ concentrations and (4) the Number of days with a daily PM₁₀ mean greater than 50 µg m⁻³ in Lewisham. Similarly, the contours (changes in colours) show how the pollution gradient changes, with distance, away from the heavier traffic. The concentrations PM₁₀ are generally low and below the recommended limit. The concentrations daily PM₁₀ are generally low and below the recommended limit and slightly higher around major roads where heavy traffic is expected.

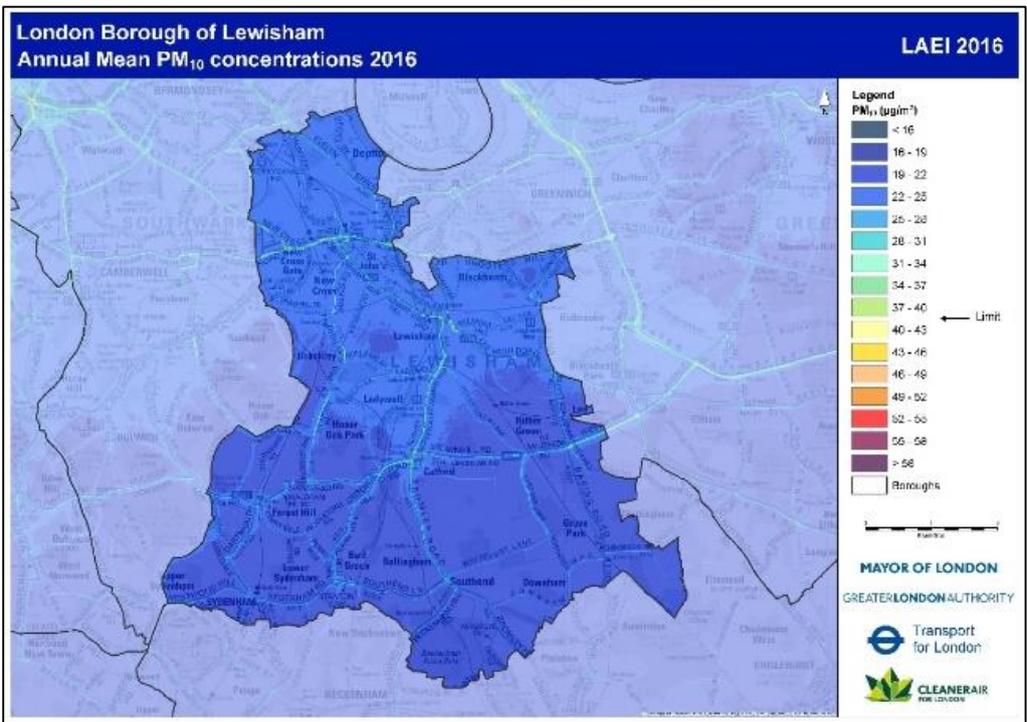


Figure 3 LAEI baseline annual mean PM_{10} concentrations (from the LAEI 2016)

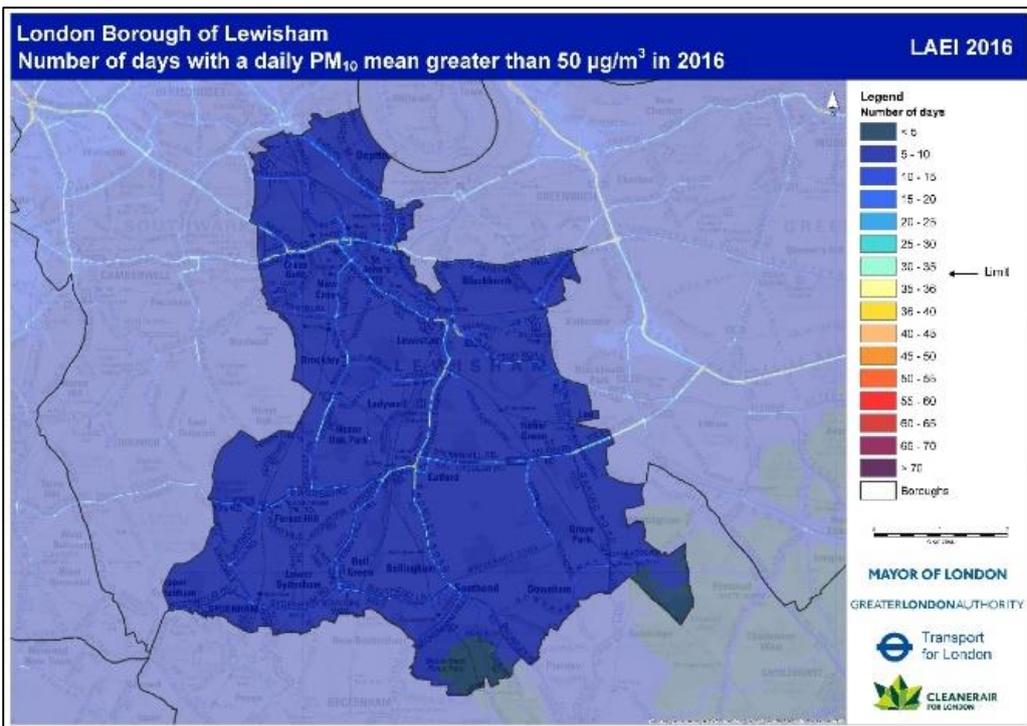


Figure 4 Number of days with a daily PM_{10} mean greater than $50 \mu\text{g}/\text{m}^3$ (from the LAEI 2016).

Note: At the time of writing this plan, no updated version of this figure was available on the LAEI website for use. The new data is due before the end of 2022 and the plan will be updated accordingly.

Figure 5 shows the 2016 LAEI baseline annual mean $\text{PM}_{2.5}$ concentrations in Lewisham. There is no evidence that there is any safe level for $\text{PM}_{2.5}$. They are small enough that they penetrate Cardio-vascular & respiratory systems and get stuck there, then cause negative impacts to human

health⁵⁵. The map shows that higher concentrations of PM_{2.5} are recorded on major roads where heavy traffic occur.

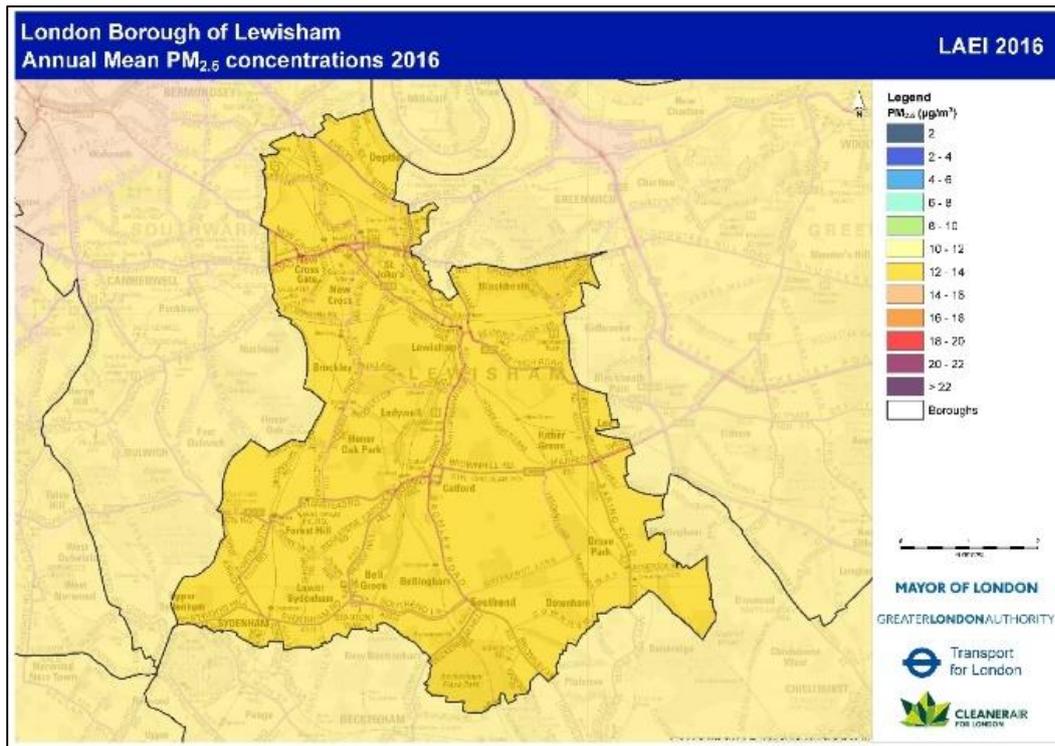


Figure 5 LAEI baseline annual mean PM_{2.5} concentrations (from the LAEI 2016)

Note: At the time of writing this plan, no updated version of this figure was available on the LAEI website for use. The new data is due before the end of 2022 and the plan will be updated accordingly.

⁵⁵ <https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/particle-pollution>

Lewisham`s Air quality Monitoring Data and Trends

While utilising detailed air quality modelling data such as the LAEI, LBL also has statutory duties to monitor a variety of pollutants across the borough. The results of historical and current monitoring show that the concentrations of pollutants have decreased over the years and the full reports can be found on our webpage⁵⁶.

Current NO₂ diffusions tube and automatic station locations and results of the 2019 air quality monitoring round are presented in our current Annual Status report available on our webpage⁵⁷.

1.1 AQMAs and Focus areas

There are two major Air Quality Management Areas (AQMAs) declared within LBL.

- Lewisham AQMA declared in 2001 for exceedances in annual mean NO₂ and 24-hour mean PM₁₀ concentrations and;
- Crofton Park and Honor Oak Park AQMA declared in 2013 for exceedances in annual mean NO₂ concentrations.

A map of the AQMAs can be found in Figure 6. Lewisham`s two AQMAs cover most of the borough apart from the south eastern part.

The AQMA has been declared for Nitrogen Dioxide because we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations. It also examines levels of Particulate Matter (PM) because although we are meeting EU Limits we are exceeding World Health Organisation air quality guideline for this pollutant. We have a formal responsibility to work towards reductions of PM_{2.5}, which is a fraction of PM₁₀ and predicted concentrations of PM_{2.5} are generally between 12-14 µg m⁻³ across the borough and higher and up to 20 µg m⁻³ along major routes with heavier traffic. The WHO introduced a target 10 µg m⁻³ annual mean concentration, which was reduced to 5 µg m⁻³ in 2021 following new scientific evidence of the actual human health risk.

Figures 6 and 7 Air Quality Management Areas in (6) the areas declared in 2001 and 2013 (7) the geographic location of the areas within the areas declared in 2001 (not to scale).

⁵⁶ <https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality-action-plan-and-other-reports>

⁵⁷ <https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality-action-plan-and-other-reports>

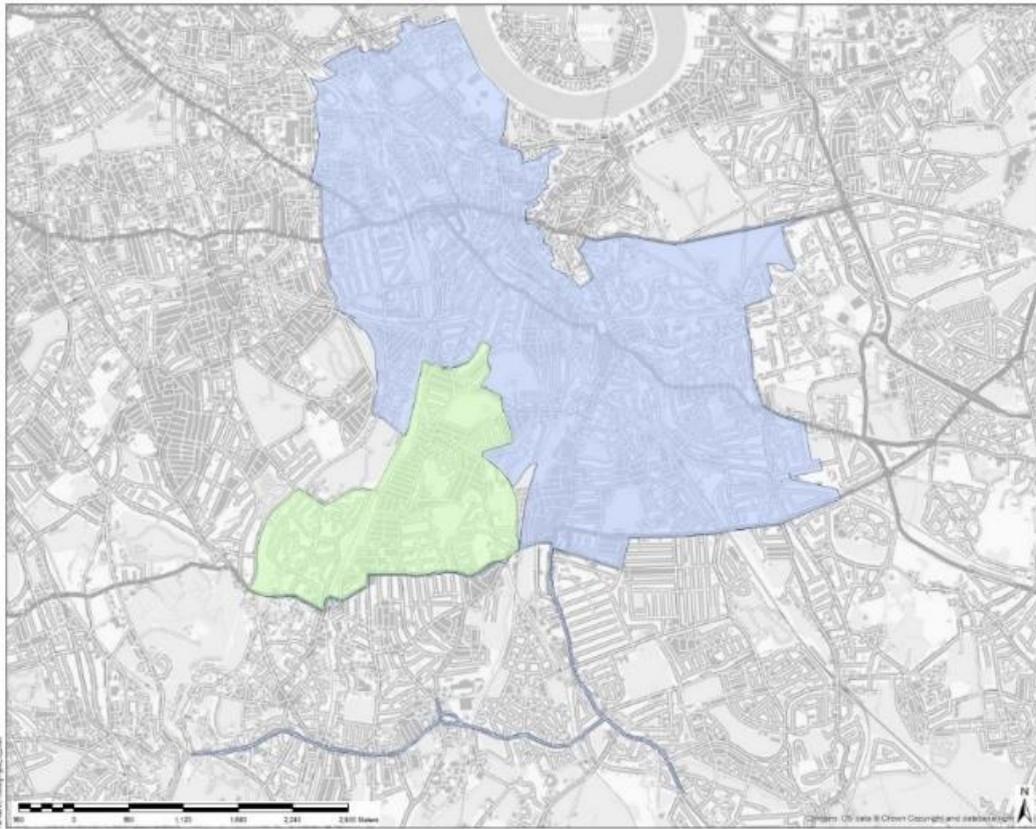


Figure 6 AQMA declared in 2001 and 2013

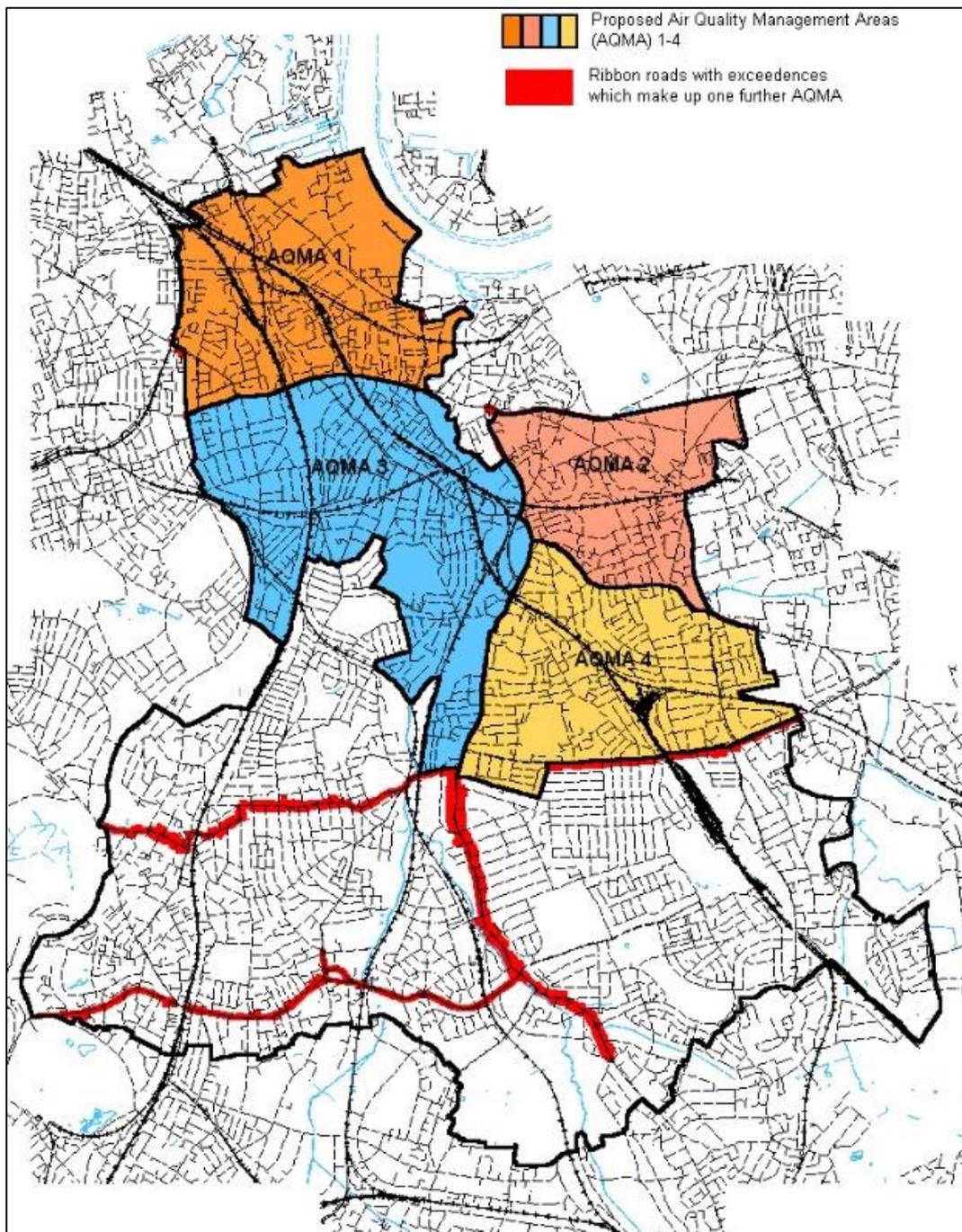


Figure 7 The geographic location of the AQMA within the areas declared in 2001 (not to scale)

An Air Quality Focus Area is a location that has been identified by the GLA as having high levels of pollution and human health exposure. There are nine focus areas in the borough. Lewisham’s annual summary report, available on our website, shows the actions taken in the focus areas. Further actions are proposed as part of this AQAP.

The current Air Quality Focus Areas are included on the maps (Figure 8) of pollutant concentrations across Lewisham.

Table 1.1 Past and Ongoing LIP projects in Air Quality Focus Areas

No.	GLA ref.	Focus Area	Local Implementation Plan Projects ⁵⁸					
1	125	Deptford Church Street	Quietway 1 (Implemented)	Cycle Superhighway 4 (in design) <i>This is now being delivered on Evelyn Street. Due to be fully complete in Autumn 2022.</i> <i>We are also undertaking a feasibility study into segregated cycle lanes on DCS although this is not LIP funded.</i>	Quietway 2 (in design)	S106 New Bus Services	New Electric Vehicle CP Sites <i>With the OZEV funding secured for 22/23 we're seeking to deliver a further 40 on-street EVCPs.</i>	New 20mph limits ⁵⁹
2	126	New Cross	Bakerloo Line Extension (Consultation)	A2 Corridor Study – TfL	Old Kent Road OA work with LB Southwark & GLA	S106 New Bus Services	New Electric Vehicle CP Sites	New 20mph limits Deptford Parks Liveable Neighbourhood (DPLN) Project <i>The implementation is subject to funding.</i>

⁵⁸ The future implementation of the ongoing/planned projects will depend on the availability of the appropriate level of funding. Current funding is in place 24 June 2022 and then there is no certainty of funding beyond this point.

⁵⁹ There is a borough-wide 20mph limit in place. Any new 20mph limits will be on TfL roads

No.	GLA ref.	Focus Area	Local Implementation Plan Projects ⁵⁸					
								Woodpecker Walk improvements that come into New Cross Ward.
3	127	Brockley Cross	Rail Strategy including Overground proposals	B218 Corridor Study <i>The delivery of future phases will be subject to funding.</i>	New EVCP Sites	New 20mph limits		
4	128	Honor Oak Park	New speed camera at Stondon Park Junction (implemented)	B218 Corridor Study	New EVCP Sites	New 20mph limits		
5	129	Loampit Vale & L. High St	Bakerloo Line Extension (Consultation)		New EVCP Sites	New 20mph limits		
6	130	Catford Road	Major regeneration programme, including A205 alignment (feasibility) <i>We're continuing to work with TfL and the next milestone is to submit the</i>	Quietway 2 (in design)	New EVCP Sites <i>With the OZEV funding secured for 22/23 we're seeking to deliver a further 40 on-street EVCPs.</i>	New 20mph limits		

No.	GLA ref.	Focus Area	Local Implementation Plan Projects ⁵⁸					
			<i>strategic outline business case to DfT</i>					
7	131	A205 Brownhill Road	A205 Brownhill Road Corridor improvements (in design)	New EVCP Sites	New 20mph limits	TFL road <i>Further improvements are being proposed by TfL at the Brownhill Rd / Torridon Rd junction.</i>		
8	132	Forest Hill	A205 Devonshire Rd minor junction improvement (implemented)	Dartmouth Road streetscape improvements (including 20mph measures)	New EVCP Sites	New 20mph limits	Air Quality Assessment commissioned with recommendations in 2017	
9	133	Deptford Parks	Copenhagen crossings	Prince Street and Scawen Rd modal filters <i>Initially introduced as temporary measure, these have now been made permanent.</i>		Streets in North Deptford will see reduced traffic owing to new restrictions.	Improvements to Woodpecker Walk and Rolt Street are due to be implemented – <i>These have now been delivered. As per update in Table J</i>	Liveability Neighbourhoods- Streets in North Deptford will see reduced traffic owing to new restrictions. The funding picture and the scope of work for this action remain unclear <i>There is currently no Liveable Neighbourhoods funding for the Deptford Park Liveable</i>

No.	GLA ref.	Focus Area	Local Implementation Plan Projects ⁵⁸					
								<i>Neighbourhood Scheme.</i>

Borough Wide Interventions to deal with Air Pollution

It is important that LBL keep working to reduce levels of air pollution not only in Air Quality Management Areas (AQMAs) but across the wider local authority area. As outlined in our 2019 review of interventions to improve outdoor air quality and health⁶⁰, Public Health England (PHE) recommend that evaluation is embedded in the design of interventions from their outset and to systematically gather evidence of their impact and effectiveness. Certain principles will guide our approach to reducing air pollution across the borough, including: different air pollutants will be considered and tackled together, we will, work with all stakeholders and local authorities using a coherent approach as prescribed in this GLA template, involve everyone in our actions, attempt to reduce air pollution at source than to mitigate the consequences, which can lead to economic growth and provide particular support to all groups that are disproportionately affected by air pollution. We will use the interventions available to local authorities as prescribed by PHE to reduce pollution across the borough together with the GLA prescribed methodologies to address air pollution across the borough.

A summary of public health air quality indicators for London authorities is available online for consultation⁶¹. For Lewisham, the values and trends of indicators are currently 6.4, 11.3 and 55.5% respectively for fraction of mortality attributed to particulate air pollution, air pollution: fine particulate matter both for the year 2019 and proportion of population living within AQMAs (%) in 2017. These indicators will be monitored throughout the course of this plan.

Air Pollution and Inequalities in Lewisham.

The GLA report⁶² analyses the relationship between exposure to air pollution, deprivation and ethnicity in London in 2019. The report builds on previous analysis undertaken on behalf of the Greater London Authority: Air Pollution Exposure in London: Impact of the Environment Strategy (2019), Updated Analysis of Air Pollution Exposure in London (2017) and Analysing Air Pollution Exposure in London (2013). These reports all focused on air quality at that time in London, seeking to identify whether air pollution had a role in health and social inequality and the degree to which it could be quantified (using data available at that time).

⁶⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938623/Review_of_interventions_to_improve_air_quality_March-2019-2018572.pdf

⁶¹

https://fingertips.phe.org.uk/search/air%20quality#page/0/gid/1/pat/6/ati/102/are/E09000023/iid/92924/age/-1/sex/-1/cat/-1/ctp/-1/cid/4/tbm/1/page-options/car-do-0_ovw-do-0

⁶²

https://www.london.gov.uk/sites/default/files/air_pollution_and_inequalities_in_london_2019_update_0.pdf

The later report shows communities which have higher levels of deprivation, or a higher proportion of people from a non-white ethnic background, are still more likely to be exposed to higher levels of air pollution. However, thanks to the Mayor's policies the gap between the most and least deprived areas for exposure to NO₂ has narrowed by up to 50%.

Further research and works in Lewisham particular will be considered during the course of this plan to improve the understanding in order to address the issue of air pollution and inequalities.

1.2 Sources of Pollution in LBL

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 the UK.

Of the pollution that originates in the borough and London in general, the main sources of NO₂ are road transport and industrial sources (Figure 9). The main sources of particulate matter are road transport (e.g., diesel vehicles), re-suspension, and NRMM (Figures 9, 10). In relation to transport emissions (Figures 10 and 12) diesel vehicles predominate. Figure 15 shows that road transport is the major source of CO₂.

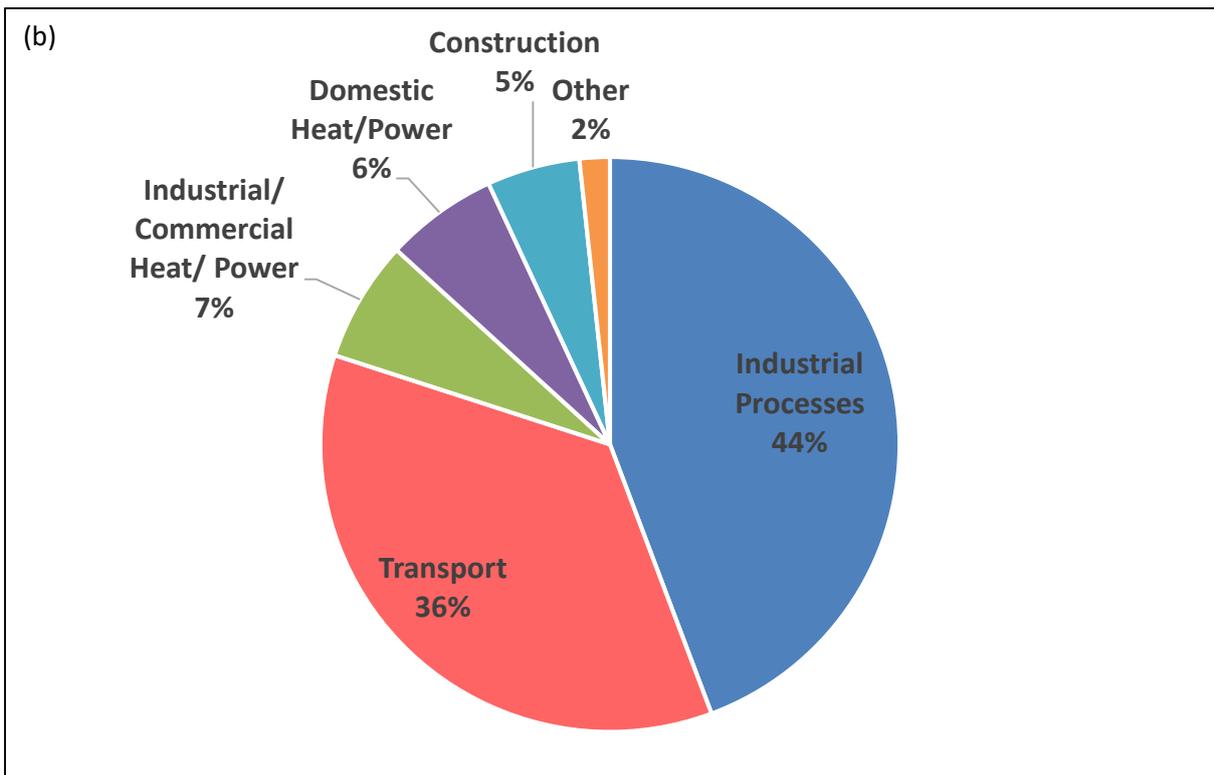
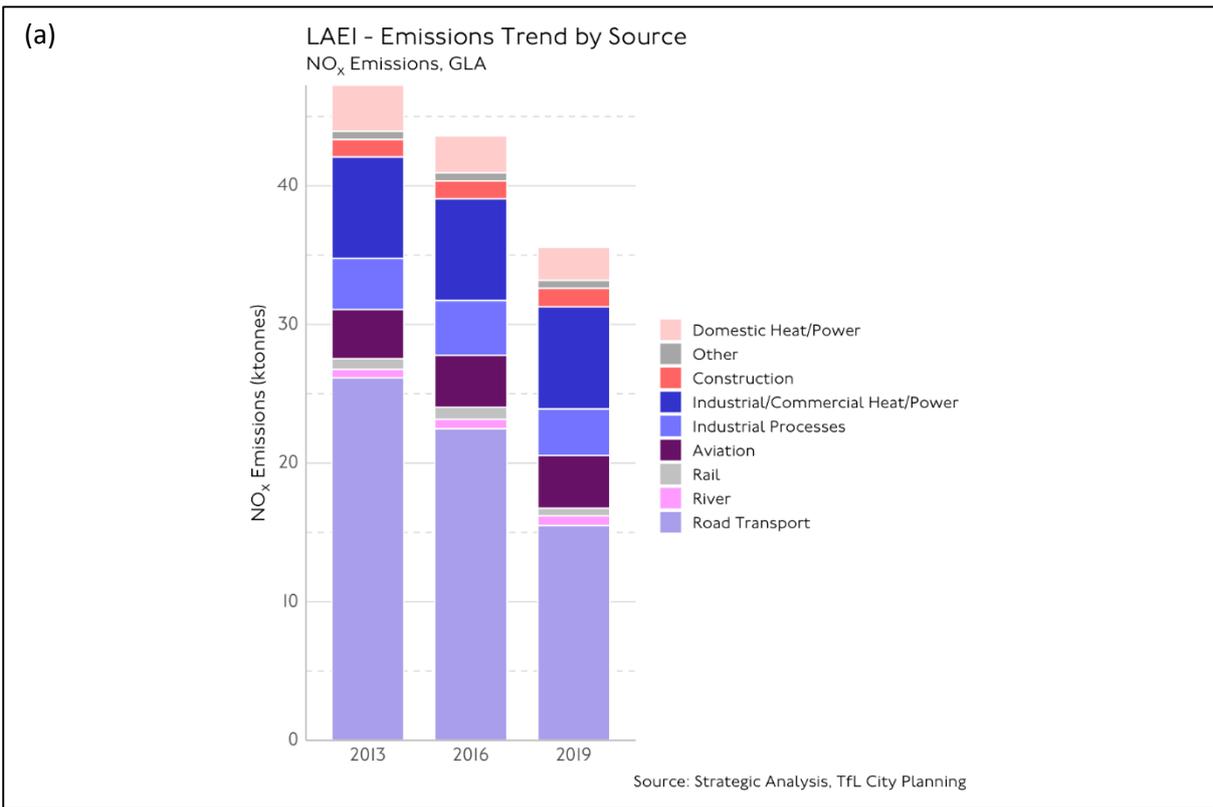


Figure 9 (a) 2019 NO_x London Emissions by source (from the LAEI 2021) and (b) LBL NO_x Emissions by source (from the LAEI 2016)

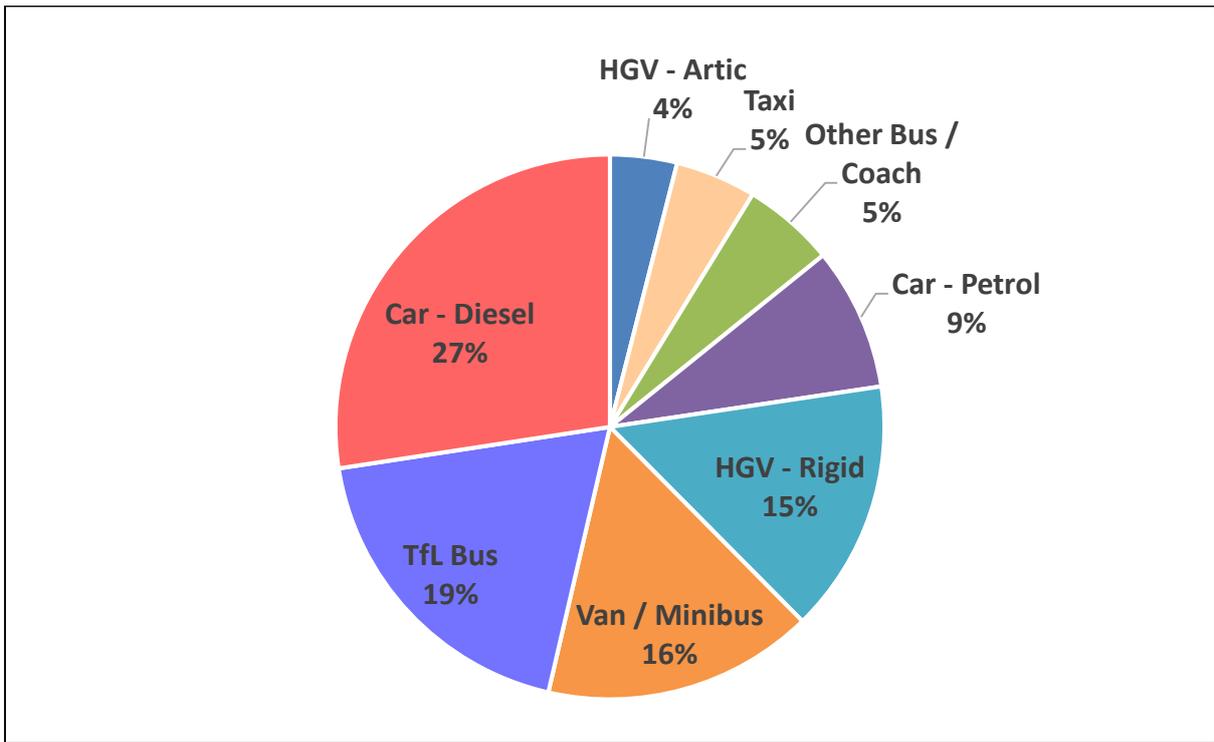


Figure 10 NOx Emissions by vehicle type breakdown (from the LAEI 2016)

This excludes industrial sources, as the Nitrogen Oxide emissions are dispersed at high level and will not have any significant contribution to resident's exposure.

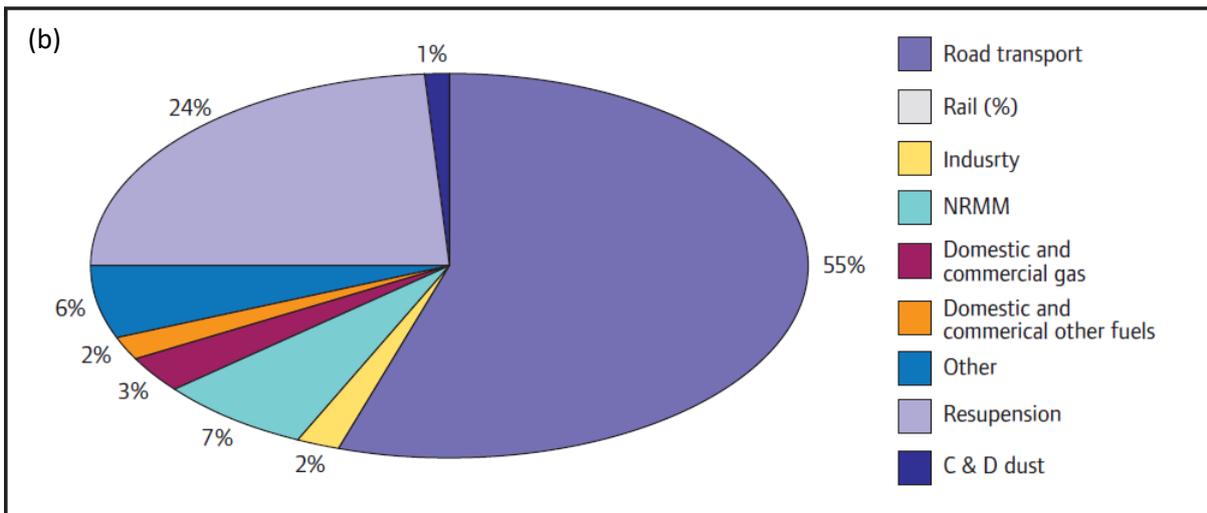
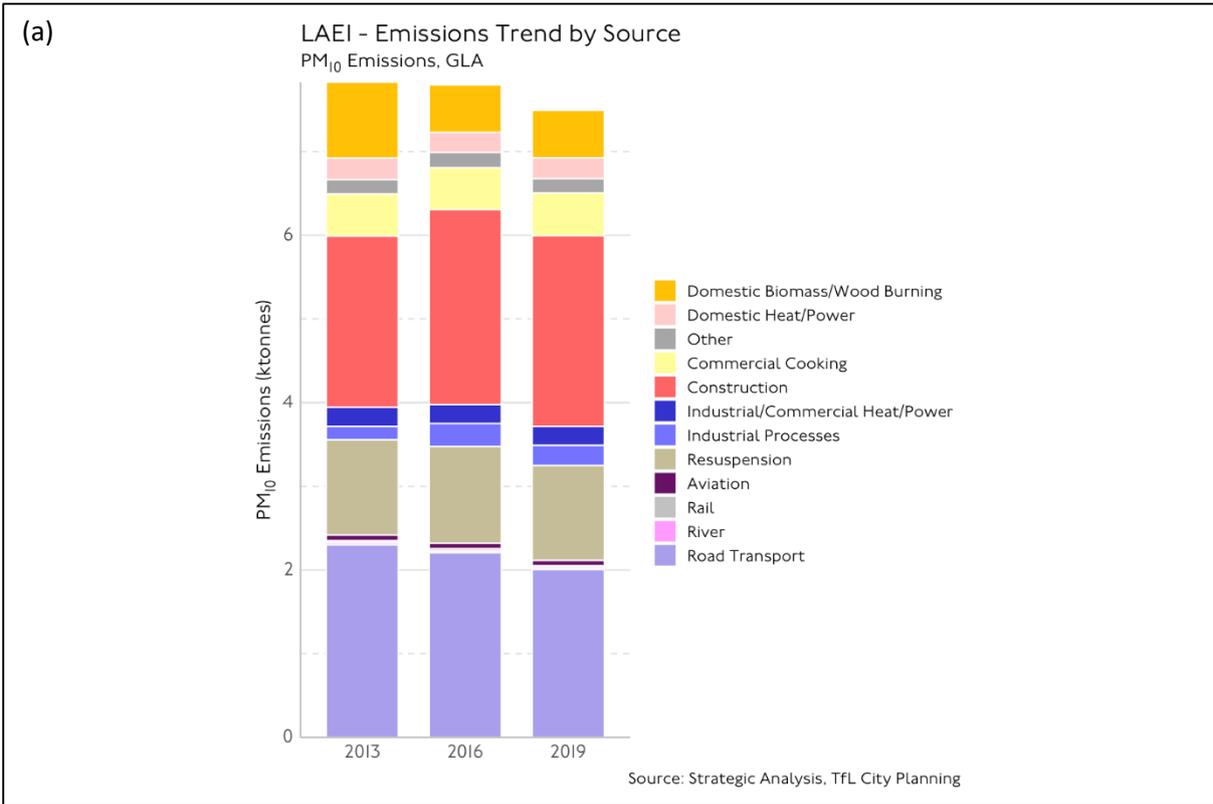


Figure 11 (a) 2019 PM₁₀ London Emissions by source (from the LAEI 2021) and (b) PM₁₀ LBL Emissions by source (from the LAEI 2013)

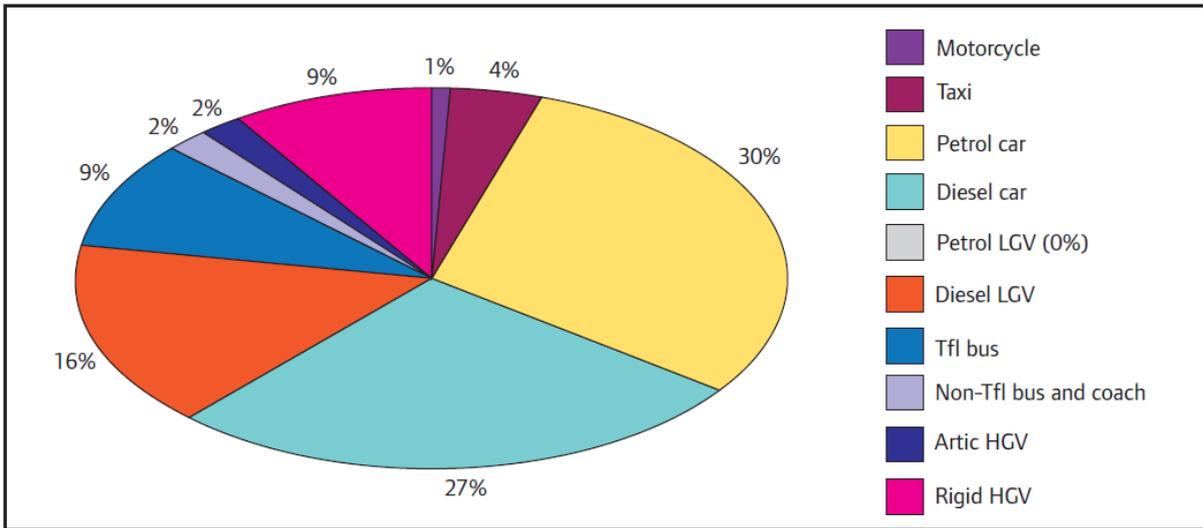


Figure 12 PM₁₀ Emissions by vehicle type with total emissions from brake, tyres and exhaust (from the LAEI 2013)

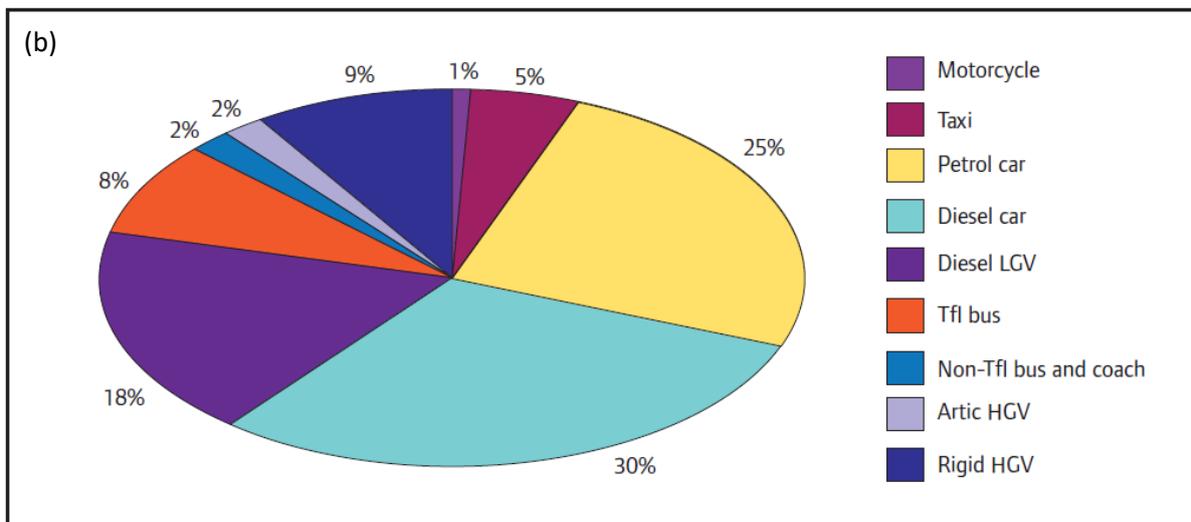
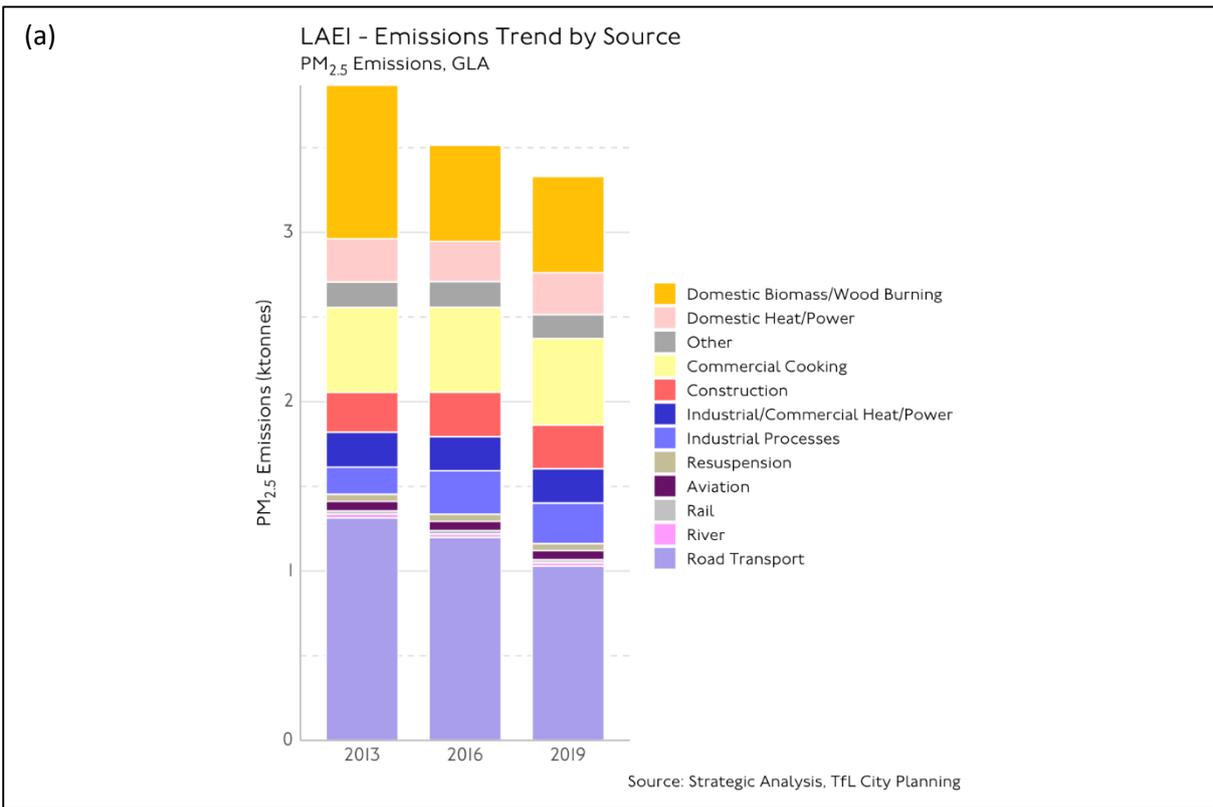


Figure 13 (a) 2019 PM_{2.5} London Emissions by source (LAEI, 2021) and (b) PM_{2.5} LBL Emissions by source (LAEI, 2013)

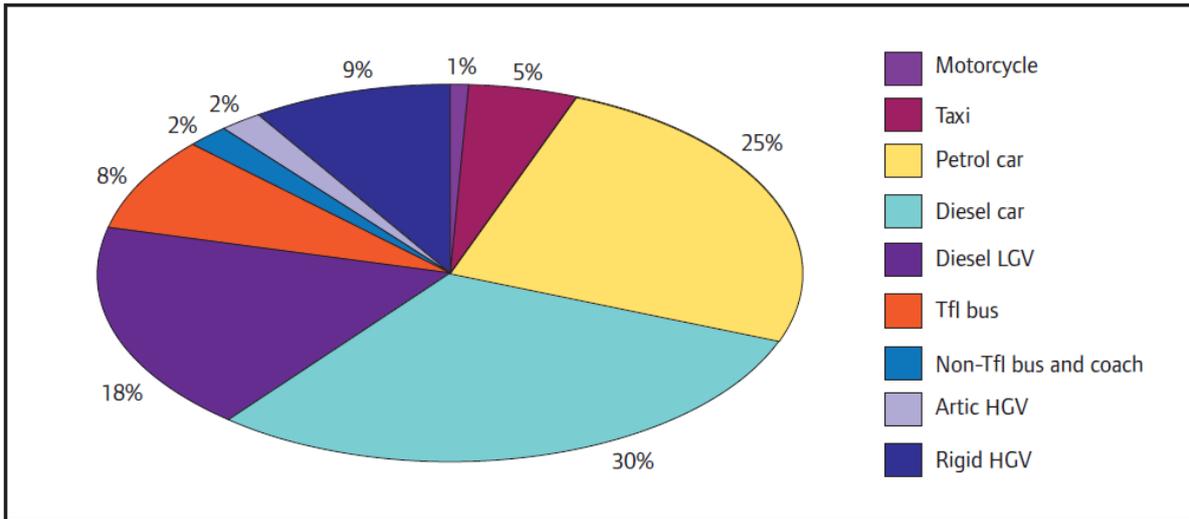


Figure 14 PM_{2.5} Emissions by vehicle type with total emissions from brake, tyres and exhaust (LAEI, 2013)

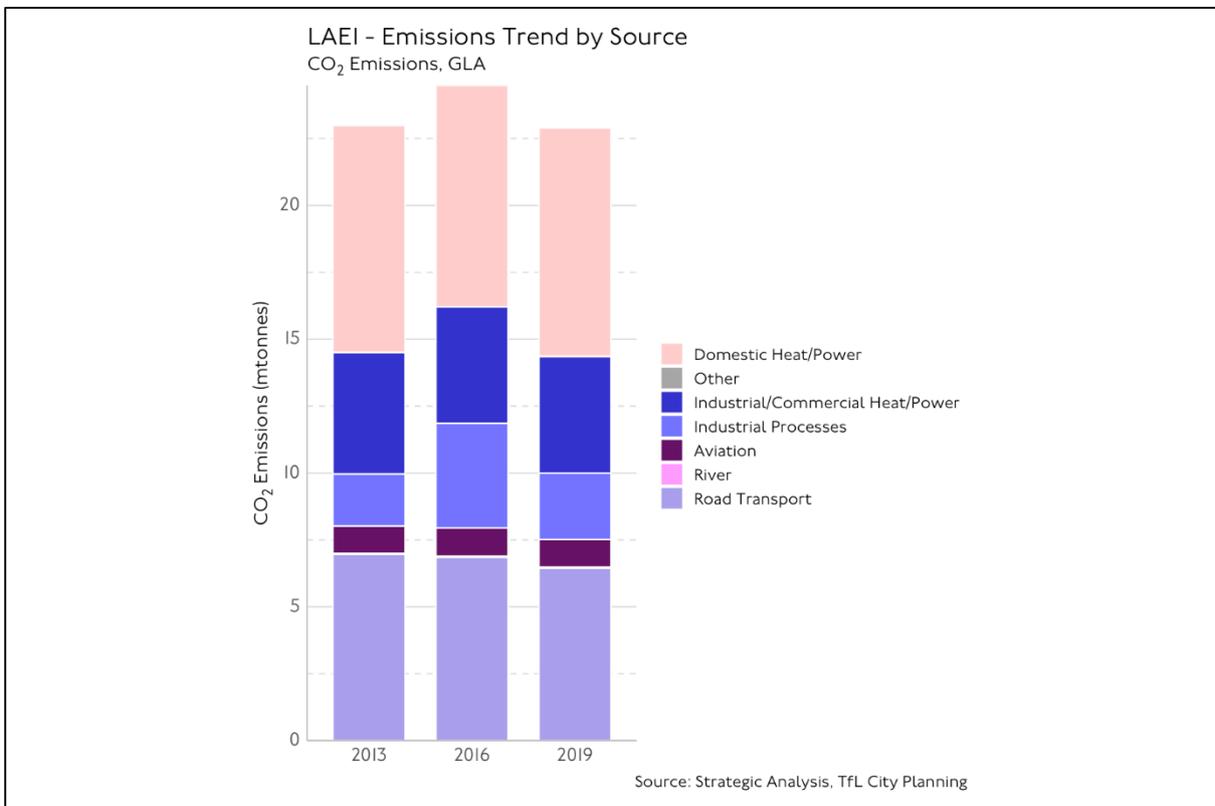


Figure 15 2019 CO₂ London Emissions by source (LAEI, 2021)

2 Our Air Quality Priorities

Our priorities have been updated to include the GLA nine matrix selected measures. A summary of the context for delivery of these in our borough is presented in this section.

This plan should be read in conjunction with other council wide strategies, including those relating to public health, business growth and transport⁶³ and Corporate Strategy 2018–2022 which set the priorities for the borough.

The Council's Four-year plan sets out a vision for how we want to support a healthier and better quality of life for Lewisham's residents and businesses. In order to deliver on these targets, we will work closely with other organisations, and support residents to act.

This AQAP has been developed in tandem with the current corporate priorities via the Borough Plan.

Borough Corporate priorities⁶⁴ :

1. **Open Lewisham:** Lewisham is a welcoming place of safety for all where we celebrate the diversity that strengthens us
2. **Tackling the housing crisis:** Everyone has a decent home that is secure and affordable
3. **Giving children and young people the best start in life:** Every child has access to an outstanding and inspiring education and is given the support they need to keep them safe, well and able to achieve their full potential
4. **Building an inclusive local economy:** Everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy
5. **Delivering and defending** health, social care and support ensuring everyone receives the health, mental health, social care, and support services they need
6. **Making Lewisham greener:** Everyone enjoys our green spaces and benefits from a healthy environment as we work to protect and improve our local environment
7. **Building safer communities:** Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

With the Corporate Strategy we have also published Equality Principles, Partner Statements and Key Pledges for our relationships with Residents, Business and the Voluntary and Community Sector.

We have been and we will continue to work closely with our partners and residents to understand:

- The differing needs of our diverse community
- The differing life chances of individuals and families
- Barriers to equality and improving opportunities and outcomes for all.

Members of the public, local community groups and wider stakeholders will be given the opportunity to have their say on this draft.

⁶³ <https://lewisham.gov.uk/mayorandcouncil/aboutthecouncil/strategies>

⁶⁴ <https://lewisham.gov.uk/mayorandcouncil/corporate-strategy>

The following have been taken into consideration when drafting this plan:

- The Environment Act 1995
- Environment Act 2021
- London LAQM (LLAQM) Framework
- London Environment Strategy
- The new London Plan and the local plan
- Development management planning
- Opportunities for partnership working across Council departments
- Air quality monitoring
- Enforcement
- Planning
- Borough fleet and procurement
- Cycling and walking
- Encourage low emission vehicles for deliveries and via updated parking policies.

The **Environment Act 1995** requires the UK Government to publish a National Air Quality Strategy (NAQS), the latest revision of which was published in 2007 as The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. The NAQS outlines the national air quality objectives, which are set out in the Air Quality (England) Regulations 2000 and Air Quality (England) Amendment Regulations 2002.

In addition, the Air Quality Standards Regulations 2010 (EU Directive 2005/50/EC) sets legally binding targets for additional pollutants, as well as an exposure reduction target for PM_{2.5}.

- nitrogen dioxide (NO₂);
- particulate matter (PM₁₀);
- sulphur dioxide (SO₂);
- carbon monoxide;
- benzene;
- 1,3-butadiene; and
- lead.

The **Environment Act 2021**⁶⁵ instructs the Secretary of State to set a binding target value for PM_{2.5} to replace to existing exposure reduction approach.

London LAQM (LLAQM) Framework⁶⁶ requires all local authorities are required to assess and review air quality on a regular basis under the Local Air Quality Management (LAQM) regime. The Mayor of London has powers to intervene and direct local authorities in Greater London. In support of these devolved powers, the Mayor established the London LAQM (LLAQM) framework in 2016 for the coordinated discharge of the Mayor's and borough's responsibilities.

London Environment Strategy was published in 2018 and outlines the Mayor of London's objectives and policies to improve the environment, including those relating to air quality. Its aim is for London to have "the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities."

⁶⁵ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

⁶⁶ <https://laqm.defra.gov.uk/air-quality/guidance/technical-guidance/>

This strategy includes setting new targets for particulate matter, including meeting the 2005 World Health Organization guidelines for PM_{2.5} by 2030. It also sets aims for planning policy in London to address with emissions from developments, including those associated with the construction and demolition phases. Such policies include:

- The requirement for new developments to be air quality neutral;
- The adoption of an air quality positive approach for large scale developments subject to the Environmental Impact Assessment Regulations ;
- Enforcement powers for existing polluting combustion plant, such as Combined Heat and Power (CHP);
- Phasing out of combustion technology for the heating and cooling of new developments; and
- The introduction of a low emission zone for non-road mobile machinery (NRMM).

The National Planning Policy Framework (NPPF) contains a number of policies related to air quality. The NPPF is updated periodically; the following policies concern air quality from the NPPF published in 2021.

The London Plan 2021⁶⁷ is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough Local Plans must be in ‘general conformity’ with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably.

LBL Local plan⁶⁸ - The new local plan will set out a long-term strategy for the next 20 years, from 2020 to 2040.

Cleaner Air Borough Status⁶⁹ was awarded to Lewisham by the Mayor of London in recognition of the efforts made via the AQAP towards tackling air pollution. This status has enabled the Council to bid for additional air quality funding from the GLA. Improving air quality and maintaining Cleaner Air Borough Status by achieving our AQAP actions is a critical priority for Lewisham.

Lewisham Core Strategy⁷⁰ - The Lewisham Core Strategy sets out the vision, objectives, strategy, and policies that will guide public and private sector investment to manage development and regeneration in the borough over the next 15 years. The Core Strategy is the key planning document in the Lewisham Local Development Framework (LDF). It sets out the overall ambitions and priorities for the borough, a set of proposals, and a means for making sure that they are delivered.

Lewisham transport strategy and local implementation plan for 2019–2041⁷¹ sets out how we are going to deliver the three objectives of the Mayor's transport strategy in the Lewisham

⁶⁷ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>

⁶⁸ <https://lewisham.gov.uk/myservices/planning/policy/planning>

⁶⁹ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

⁷⁰ <https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/core-strategy>

⁷¹ <https://lewisham.gov.uk/inmyarea/regeneration/transport-and-major-infrastructure/local-implementation-plan>

borough. The strategy has three main objectives are healthy streets and healthy people, a good public transport experience and new homes and jobs.

Housing development⁷² in the borough encourages local growth, jobs and retention of families and communities but resulting emissions may also have impact on air quality if not managed in an adequate way.

Lewisham Council has met or exceeded the London Plan housing targets for the last 15 years thanks to its progressive and innovative approach to housing. The latest figures – for 2016/17 – are particularly impressive, with the delivery of 1,385 homes, exceeding the target by 29%. 15,000 new homes will be built in Lewisham by 2033 and the council is playing an active role in driving the delivery of these.

Larger scale housing development will be focused within the growth areas of Lewisham, Catford, Deptford and New Cross, and the council has ambitions to create more social and affordable housing as well as new council-owned homes for private rent.

Opportunity areas that have been identified as a focus for new housing and jobs include for Deptford Creek, Riverside (with LB Greenwich), Lewisham, Catford and New Cross. Dealing with Air quality resulting from the development will be one of our key priorities during the course of this action plan.

TfL wishes to extend the Bakerloo Tube Line (BTL) to Lewisham to improve connections in southeast London and enable growth in homes and jobs. Lewisham as a terminus via the Old Kent Road and New Cross Gate has been chosen as the best option to achieve those goals, following extensive consultation.

The Core Strategy is based on a vision for the type of place the borough will be in 2026, the key drivers of change which impact on the borough now and in the future, and the need to ensure that any change is maximised for the long-term benefit of all in the Lewisham community. The core strategy forms part of the development plan for the borough, together with the: Site Allocations Local Plan, Lewisham Town Centre Local Plan, Development Management Local Plan and London Plan.

The following table ranks our air quality priorities for the 2022-2027.

⁷² This website is run by our economy and partnerships team: <https://lewishamlondon.co.uk/interactive-development-map/>

Table 2.1 Lewisham Air quality Priorities for 2022-2027

Priorities No.	Priorities Title	Description
1	Communication and Raising Public Health and Awareness	<p>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.</p> <p>Working closely with the Lewisham council’s communications team, we will use several readily available resources to raising awareness of health impacts of air quality and monitor these health impacts more closely. Available resources for use will include.</p> <ul style="list-style-type: none"> • Greater London Authority (GLA) alerts; we will retweet the Mayor of London’s alert from @MayorOfLondon and use our own social media to share the messaging. We will share the alert email with available contacts. These will include GPs, care homes, nurseries, and other vulnerable groups; we will continue to promote the Mayor’s air pollution forecasts. These will include GPs, Pharmacies, care homes, nurseries, and other vulnerable groups; we will continue to promote the Mayor’s air pollution forecasts in other groups and businesses. • The Imperial College London Air webpage, which is a useful tool for finding out about current pollution levels across London. We will provide links to this website on our webpage. • We will promote free sign up to our Lewisham app. The app is a phone app for anyone to download providing a branded presence on people’s phones and it is an app which the Council can control, pushing messages to advertise events, news items, consultations etc. It also gives a direct line to all users and also gets ongoing stats about engagement, which is hard to measure with other mediums. The App is also promoted to the respiratory nurses as well to raise awareness amongst COPD & Asthma patients and their carers. We will continue supporting alerts services such as Lewisham App and promoting the Mayor’s air pollution forecasts. We will also promote to sign our clean air pledge. • Free pollution alerts on the airTEXT website or similar technologies available in Lewisham. AirTEXT provides a map showing forecasts of expected air quality over the next three days in London, to enable you to plan ahead. Lewisham council will subscript similar technologies to increase the reach. • the school pollution helpdesk and share the GLA schools toolkit to be used by schools to improve air quality and

Priorities No.	Priorities Title	Description
		<ul style="list-style-type: none"> The GLA air quality webpage as a good starting point to find out about air pollution in London and the action the Mayor is taking. <p>Around a period of high pollution, we will share information on the causes of pollution within LBL and link to services, schemes or toolkits that are working to provide solutions.</p> <p>We will work with Lewisham Clinical Commissioning Group (CCG) to continue to raise awareness, so that the GPs promote our Lewisham App to Chronic obstructive pulmonary disease (COPD) and asthma patients and their carers.</p> <p>We will continue to work with GLA's idling action project to promote stopping idling in the borough, particularly in front schools, nurseries, and businesses in the borough. We will continue to work with CRP to work with local businesses to raise awareness on clean air villages and routes. Consideration will be given to improving promotion and engagement activities and increase projects involving businesses, organisations, institutions and community groups to raise awareness about air quality.</p> <p>If funding allows us to, our intention is to undertake a campaign on different air quality related issues and specifically at locations where vulnerable groups can be found.</p>
2	Minimising emissions from New Developments	<p>In Lewisham's Core Strategy ⁷³ one of the visions of the borough is that by 2026:</p> <p>'The north of the borough has 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.' A major area of development for the next 5-year period of this AQAP will be the opportunity areas ⁷⁴that have been identified as a focus for new housing and jobs. The area includes for Deptford Creek, Riverside (with LB Greenwich), Lewisham, Catford, New Cross and the expansion of Bakerloo Tube Line (BTL).</p> <p>A priority for this AQAP is therefore to provide development, through construction and build, which minimises emissions through effective planning policy, development management and environmental protection enforcement. As part of this priority Lewisham, through future London's Mayor Air Quality Funding (MAQF) or other sources of funding, is seeking to still 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.</p> <p>As part of this action, we will be enforcing the Non-Road Mobile Machinery (NRMM) Low Emission Zone.</p>

⁷³ <https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/core-strategy/about-our-core-strategy-for-the-local-development-framework>

⁷⁴ <https://lewishamlondon.co.uk/interactive-development-map/>

Priorities No.	Priorities Title	Description
3	Expanding the Council's Sustainable Transport Infrastructure	LBL 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 100 plus electric vehicle charging points within the borough, accessible to all residents who are registered with Source London ⁷⁵ . Usage is continually reviewed, and identification of new locations will consider residents requests through Source London. Consideration of non-obstruction of pedestrian pathways and pathways for wheelchairs will be considered during the design of electric vehicle charging points.
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.
5a	School action plan	Reducing pollution in and around schools and extending school audits to other schools in polluted areas
5b	Infrastructure	Improving walking and cycling infrastructure
6	Energy	Promoting and delivering energy efficiency retrofitting projects in workplaces and homes
7	EV Infrastructure	Installing Ultra-Low Emission Vehicle (ULEV) infrastructure
8	Pedestrianisation	Regular car free days/temporary road closures in high footfall areas
9	Borough fleet	Reducing emissions from the borough fleet
10	Smoke Control Zones	Promoting and enforcing Smoke Control Zones

⁷⁵ www.sourcelondon.net

3 Development and Implementation of our 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.

Effective communication, engagement, and consultation it is of paramount importance to ensuring that this AQAP fulfils its goal in producing quantifiable outcomes as presented in Table 4.1 to timescale from all stakeholders and delivery partners who have an influence on air quality within the borough and outside the organisation.

We will develop a plan that will enable us to communication, engagement, and consultation with the public and any interested party during the development and implementation of this AQAP. We will get the involvement of local communities, volunteers, businesses, schools and institutions, and organisations to support the plan and help with campaign, events, and training, as necessary.

We will undertake the following stakeholder engagement:

- Publicity on website and social media ,
- Articles in local newspaper,
- Online questionnaire to local residents and businesses to seek opinions on actions.
- Healthy Lungs tent/poster where possible, raising issues and highlighting Council's action.

The response to our consultation stakeholder engagement will be given in Appendix A of this report.

Table 3.1 Consultation Undertaken

Yes/No	Consultee
	The Environment Agency
Yes	Transport for London and the Mayor of London (who will provide a joint response)
Yes	All neighbouring local authorities
Yes	Other public authorities as appropriate
Yes	Bodies representing local business interests and other organisations as appropriate

3.2 Steering Group

The following internal Council teams will be engaged through a Steering Group and specialist Working Groups:

Development Control, Planning Policy, Project Management, Public Health, Procurement and Legal, Energy and Efficiency, Travel Demand Management, Fleet Services, Transport Planning (including Sustainable Transport).

The purpose of the group will be to consider all the actions proposed by the GLA and to review the potential for incorporating these within Lewisham’s AQAP. The meetings will be 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 will be a good opportunity to build relationships and alignment 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 Group will meet on a regular basis to provide input and feedback and ensure communication channels are maintained.

The challenge will be 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.

The following meetings/workshops (Table 3.2) have been held to discuss the AQAP: Locations/ Purpose/ summary of activities pushed forward in the implementation of this AQAP. All virtual Team meetings were organised and chaired by the manager of the Environmental Protection team manager Dr Eliane S. Foteu M.

Table 3.2 List of Design Meeting with Internal Stakeholders

Date	Title Meeting/Service	Time	Type or purpose
02/11/2020	Correspondences to all internal stakeholders	NA	Via email about the intention to review the plan
17/12/2020	Air Quality Working Group Meeting	11:00-12:00	Team meeting
11/01/2021	Public Health	16:15-17:17	Service specific AQAP measures.
12/01/2021	Parks & Regeneration Planning and development	15:00-16:00	Service specific AQAP measures
13/01/2021	Housing Private Sector (Environmental Health Residential)/Private Sector Housing (Grants) Climate Resilience	15:00-16:00	Service specific AQAP measures.
19/01/2021	Parking Enforcement Transport	11:00-12:00	Service specific AQAP measures.
25/01/2021	Procurement and Commercial Services	12:00-13:00	Service specific AQAP measures.
	Environmental Health		
	Environmental Protection		
	Communication teams		
	Crime Enforcement Regulation (CER)		
	Fleet (S.G.M Environment)		

Date	Title Meeting/Service	Time	Type or purpose
01/02/2021	Parking	14.30-15.30	AQAP and new parking proposals
	Highways and Transport (head)		
	Environmental Health(head)		
	Director of Public Realm (Director)		
	Environmental Protection		
03/02/2021	Transport	14:00-15:00	Discussion/some Transport measures
04/02/2021	Procurement and Commercial Services	12:00-13:00	Social value/KPIs
22/02/2021	Environmental Health and Public health	14.30-15.30	AQAP / GLA meeting follow up
25/11/2021	Sustainable Developments Select Committee	18.00-20.00	AQAP Consultation Briefing post consultation
31/03/2022	Health Protection Committee	10.00-11.15	Sign off
31/05/2022	Air Quality Strategic Board / Working Group Meeting	13.30-14.00	Final AQAP and sign off
08/06/2021	Executive Management Team	10.50-11.00	AQAP Consultation Briefing post consultation and sign off
21/06/2021	All Member Briefing	TBC	AQAP Consultation Briefing post consultation and sign off
20/06/2021	Sustainable Developments Select Committee	TBC	Sign off
6/07/2022	Lewisham Mayor and Cabinet approval	TBC	Final AQAP and sign off

4 Action Plan Table

Table 4.1 shows the London Borough of Lewisham 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
- The outputs, targets, and Key Performance Indicators
- How progress will be monitored.

Evaluation Methods: Impact-Cost-timescale of Implementation

The actions presented in Table 4.1 are evaluated in relation to their expected impact on: (1) air quality (i.e., reduction in emissions or concentrations); (2) cost; and (3) timescale for implementation.

- Air quality impacts have been classified to represent '**very low**' to '**high**' impact. The higher the impact, the greater the improvement in air quality, i.e., the greater the reduction in NO₂ and/ or PM₁₀ concentrations. For each action, the expected reduction in annual mean pollutant concentrations has been determined based on professional judgement, drawing on experience gained from other studies, as well as the LLAQM Borough Air Quality Action Matrix as published by the GLA.
- The implementation of the measures set out in this Action Plan are dependent on the resources required to deliver the programme. In line with current London Technical guidance, it is not necessary to carry out a detailed cost-benefit analysis. Rather the aim is to provide a broad indication of costs so that the proposed measures can be ranked according to the cost and the expected improvement to air quality.

The following classification scheme has been used for air quality impacts, cost, and timescale for the implementation of the measures:

The assessment of air quality impacts, cost, and timescale each action is variable and presented in Table 4.1.

Class	Air Quality Impact	Cost in £000's	Timescale for the implementation of the measures
Very Low	No indirect and direct impacts on air quality (o)	£10 and less (£)	N/A
Low	Improvements are unlikely to be detected within the uncertainties of monitoring and modelling (1)	£10 - £50 (££)	N/A
Medium	Perceptible (a demonstrable improvement in air quality). An improvement of up to 5% of the objective ($2\mu\text{g m}^{-3}$), which could be shown by a modelling scenario. (2)	£50 – 500 (£££)	N/A
High	Significant. Improvement of more than 5% of the objective ($2\mu\text{g m}^{-3}$). Can be clearly demonstrated by modelling or monitoring (a significant improvement is likely to be delivered by a package of options rather than by a single intervention) (3)	< £500 (££££)	N/A
Short-term	N/A	N/A	Ongoing or Within 1-2 years (ST)
Medium-term	N/A	N/A	within 2-5 years (MT)
Long-term	N/A	N/A	6+ years. (LT)

Table 4.1 Air Quality Action Plan

The actions have been grouped into seven categories: Monitoring and core statutory duties; Emissions from developments and buildings; Public health and awareness raising; Delivery servicing and freight; Borough fleet actions; Localised solutions; and Cleaner transport. LBL will continue to search for more funding and resources to work with all stakeholders and the community to improve air quality to make Lewisham a cleaner borough. The action plan considers measures and actions in terms of costs, effectiveness, time-scales and feasibility of implementation. We cannot guarantee that we will be able to do everything that is presented in this plan immediately. However, we will work hard to achieve our duty, the aim and objectives of this plan. For example, LBL does not have full control on external sources of funding and the future implementation of the LIP ongoing/planned projects as an example will depend on the availability of the appropriate level of TFL funding.

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
Air Quality (AQ) Monitoring	1.A	Maintaining and where possible expanding monitoring networks. Combined with other LA statutory duties, maintaining monitoring networks is	EP ⁷⁶ / Transport	££ to £££ Additional external funding will be needed to expand the	(0) to (1).	(ST). Project specific air quality monitoring regime to be reported elsewhere.	All outputs and KPIs will be in accordance to London Local Air Quality Management (LLAQM) Framework ⁷⁷ . KPIs include:	The locations of monitors across Lewisham will be made available on LBL website ⁷⁸ .

⁷⁶ EP=Environmental Protection Team

⁷⁷ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

⁷⁸ <https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels>

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
		critical for understanding where pollution is most acute, and what measures are effective to reduce pollution.		network further.			<p>Up to 75 further monitors will be deployed during the course of this Plan.</p> <p>We will use Template reports and KPIS provided by the GLA/DEFRA or other relevant parties involved.</p> <p>Maintaining all existing reference-level monitoring and achieving over 90% data capture</p>	<p>The “Love Clean Air” website⁷⁹ also presents all air quality data and industrial processes for Lewisham and south London.</p> <p>We will give monitoring priority to focus areas, sensitive receptors like schools, care homes and Hospitals. London Atmospheric Emissions Inventory (LAEI) figures including new GLA focus areas will be published by end of 2022.</p> <p>Lewisham will work toward achieving the</p>

⁷⁹ <https://lovecleanair.org/local-air/air-quality-map/#.YeFnrf3KnPk>

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
								new 2021 WHO guidance and monitor pollution in areas with high deprivation. Partnership with citizen science ⁸⁰ will be considered to tackle urgent environmental challenges through research, education, and community engagement.
AQ Monitoring	1.A.1	NO₂ diffusion tubes	EP/ Transport	££	(0) to (1). There is indirect emissions concentrations benefit. LBL considers that taking cleaner routes	(ST)	All outputs and timeline of reporting will be as agreed with all parties involved. We will update diffusion tube locations periodically to reflect changes in the environmental settings.	In 2018, the network was extended to include 50 sites. In September 2020, further 51 diffusion tubes were installed across Lewisham as part of the Low Traffic Neighbourhood (LTN)

⁸⁰ https://earthwatch.org/research/research-focus-areas?gclid=EAlaIqobChMI0IryoNeu9QIVE4xoCR1lzgojEAAAYASAAEgIQnvD_BwE

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
					to school can dramatically reduce exposure, several recent exposure studies suggest that switching from main roads to quiet backstreets can reduce exposure by up to 50%.		<p>Some historical tubes are to remain to fulfil the objective of the monitoring.</p> <p>KIPs:</p> <p>We will aim for:</p> <ul style="list-style-type: none"> • Over 95% data capture. • Produce an inventory of the number of monitoring sites and regularly review as appropriate. • In 2021, the ASR was submitted as agreed with the GLA. 	<p>project⁸¹; which makes a total of 101 diffusion tubes (excluding the duplicates) installed across the borough. The continuity of the later monitoring regime will depend on funding.</p> <p>We will install more diffusion tubes in the most deprived areas across the borough.</p>

⁸¹ <https://lewisham.gov.uk/articles/news/changes-to-lewisham-and-lee-green-low-traffic-neighbourhood-announced>

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
AQ Monitoring	1.A.2	Borough's automatic monitors	EP/ Transport	££ to £££	(1) No direct emissions but critical in terms of understanding continuous, short term and long-term emissions and concentrations and the impact of air quality action taken.	(ST)	All outputs and KPIs will be produced as recommended by GLA/DEFRA and the LLAQM scheme. We will Continue to monitor via 4 automatic monitoring stations and help with the Imperial College London supersite at located Honor Oak Park ⁸² . Priority will be given to seeking funding for new PM _{2.5} monitors, to help with assessing compliance	The addition of further PM _{2.5} monitors will depend on funding.

⁸² These form part of a £6m investment into three new air quality supersites– established by the Natural Environment Research Council (NERC). These site were established by the Natural Environment Research Council (NERC) in June 2019. The other sites are located in Birmingham and Manchester.

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							with meeting the new WHO targets by 2030. We will support all research projects as appropriate.	
AQ Monitoring	1.A.3	Real time trialling monitoring using Sensors There are uncertainties associated with these new technologies, which have not yet been validated for regulatory usage. ⁸³	EP/ Transport / Community & Cultural Development	££ to £££ Additional external funding will be needed.	(0) Quantification of emissions reductions is difficult as it will depend on the scheme being undertaken and on the reliability of the results	(ST)	All outputs and reporting to be agreed with all the parties involved. All project specific reports will be made available on our website for consultation by the public. Specific KPIs include: • Over 60% data capture and	Examples of trialling sensors installed or to be installed in Lewisham include: Three Breathe London community sensors and AQ map ⁸⁴ and our exiting three AQY air quality sensors installed around the LTN scheme ⁸⁵

⁸³ Please refer to the guidance under development by Defra's independent Air Quality Expert Group (AQEG)

<https://uk-air.defra.gov.uk/library/aqeg/pollution-sensors.php>

⁸⁴ <https://www.breathelondon.org/>

⁸⁵ <https://www.campbell-associates.co.uk/product/aqy-micro-air-quality-monitor>

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
					from the monitors are.		<ul style="list-style-type: none"> Assess the effectiveness of sensors to monitor the success of the relevant interventions that is being implemented. 	Further deployments are planned between 2022 and 24 as part of our 2022-24 Neighbourhood Community Infrastructure Levy (NCIL) Community Projects ⁸⁶ .
AQ Monitoring	1.A.4	At a minimum, working towards meeting interim WHO targets for PM _{2.5} by 2030	All	££to ££££	(2)	(ST)	<p>Outputs, KPIs and reporting per the Environment Act 2021⁸⁷</p> <p>Maintain the existing PM_{2.5} monitors.</p> <p>LBL will be compliant with the targets legislated in the Environment Act 2021.</p>	LBL will follow all the policies, regulation and guidance associated with the Environment Act 2021. If the Environment Bill does not include current WHO targets for PM _{2.5} , LBL will continue the work toward reducing this pollutant.

⁸⁶ E.g. Bell Green Neighbourhood Forum Air Monitoring Network (BGNF) (Bellingham Project, Perry Vale Project and Sydenham Project)

⁸⁷ <https://www.legislation.gov.uk/ukpga/2021/30/section/2/enacted>

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
Core statutory duties	1.B							
Core statutory duties	1.B.1	Annual Status Report (ASR)	Environmental Protection/ Transport	£	(2) This action allows for a much deeper understanding of annual trends across the borough for better actions.	(ST)	Submission and review following comments on the report by GLA/DEFRA and publication on our website. KPI as: All ASRs submitted on time, approved by GLA and published on our website.	The impacts of COVID-19 and the associated restrictions on activities may impact the reporting process.
Core statutory duties	1.B.2	Update AQAP every five years at a minimum and follow LLAQM guidance	EP/ Transport	£	(2)	(LT)	This plan will be reviewed before end 2027. KPI as: <ul style="list-style-type: none"> • Meet AQAP submission deadline • Deliver a wide-reaching public consultation 	The review will follow the prescribed GLA/DEFRA guidance at the time. Our AQMAs will be undertaken before

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							<ul style="list-style-type: none"> • Publication on website • Report on progress annually via the ASR. 	December 2024 and every four years after.
Emissions from developments and buildings	2	Ensuring emissions from construction are minimised	Planning/ EP /Transport	£ to ££££ Ongoing resource required from Transport and Environmental Protection to review and make recommendations regarding the discharge of conditions.	(2) Examples include: <ul style="list-style-type: none"> • Flexible and can ensure developments are best practice even at long-running developments. • This will constitute clear requirements on developers 	(ST) Already in operation. Impact of reduction will be ongoing.	Adoption of new Lewisham Local Plan by 2022/23. <ul style="list-style-type: none"> • Continue to Work closely with Planning to reduce dust from construction activities. We will continue using our planning powers to enforce air quality measures, reduce emissions, increase energy efficiency and adoption of	We will adopt air quality mitigation measures for all developments. We are compiling a Local Plan that will address all the issues relevant to sustainable development. Register of NRMM are secured in planning conditions with Construction Environmental

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
					and a level playing field for all developers.		<p>Planning Policy that is encouraging car-free developments.</p> <ul style="list-style-type: none"> • Statistical data to be included in ASR. • Log, investigate and enforce all complaints. <p>KPIs include:</p> <ul style="list-style-type: none"> • 100% of all major planning consents to have appropriate air quality and dust conditions imposed. Enforcement action considered where breaches are identified. • Maintain register of pollution control conditions • Reduction in complaints. 	<p>Management Plans (CEMPs).</p> <p>An overall reduction of the current LAEI construction related PM₁₀ & PM_{2.5} emissions is anticipated.</p>

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
Emissions from developments and buildings	3	Ensuring enforcement of non-road mobile machinery (NRMM) air quality policies	Planning/ EP	£££ Ongoing resource required from Environmental Protection to review.	(2)	(ST) Condition already introduced. Impact of reduction will be ongoing.	We will aim to register 100% of major developments for NRMM. A quarterly compliance report will be produced. LBL achieved 100% site compliance in 2020. KPIs include: Data on number of NRMM conditions recorded, and 100% of sites checked on the NRMM database once construction begins. Data on enforcement to be maintained.	LBL is part of a pan-London project MAQF NRMM Zone enforcement – to inspect construction sites in every borough, to ensure they are using the cleanest construction equipment.
Emissions from developments and buildings	4	Reducing emissions from CHP and enforcing CHP air quality policy. Ensure smaller developments use ultra-low NOx	Planning/ Community & Cultural Development	£: Ongoing resource required from Environmental Protection to review.	(0) to (1)	(ST)	We will aim to recommend ultra-low to zero emission combustion plant for all developments. KPIs include:	Planning to refer relevant discharge of conditions to EP. The EP team will continue to review air quality assessments/energy

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
		Boilers or other zero carbon low emission options.					<ul style="list-style-type: none"> • Number of conditions requiring high efficiency boilers and ultra-low NOx boilers or other low carbon low emission heating • Number of secondary heat sources integrated into heat networks. • Number of existing combustion-based CHP engines removed/replaced with cleaner, lower carbon heat sources. 	<p>strategies to ensure compliance.</p> <p>We will Investigate setting a requirement for evidence of maintenance of CHPs.</p> <p>This will include the replacement of conventional gas boilers with air source heat pumps at St Laurence Church and Community Centre, Catford as part of our NCIL Air Quality & Community Funding Pot 2022-2024 Projects.</p>
Emissions from developments and buildings	5	Enforce Air Quality Neutral policy	Planning/ EP/transport/Cli mate Resilience	£: Ongoing resource required from	(1)	(ST). Already in operation.	100% of relevant applications undertaking an Air Quality Neutral Assessment	We will include Air Quality Neutral requirements in the Council's Local Plan Policies.

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
				Environmental Protection and Planning Team.			Report statistics on compliance via the ASR and the planning portal. KPIs include: We will determine the number of development proposals meeting the air quality neutral standards.	
Emissions from developments and buildings	6	Ensuring adequate, appropriate, and well- located green space and infrastructure is included in new and existing developments	Planning / Community & Cultural Development	££	(0) to (1).	(ST)	<ul style="list-style-type: none"> • Regularly produce map of green space. • Area of green space incorporated into new developments and apply London Plan Policy principles in development opportunities. KPIs include: <ul style="list-style-type: none"> • Numbers of proposals or projects where green infrastructure is used or enhanced to provide low 	<p>Ensuring that exposure in amenity spaces is considered at the design stage and as part of the Air Quality assessment for new development and redevelopment proposals.</p> <ul style="list-style-type: none"> • Proportion of major planning applications where green amenity spaces are in areas of low exposure.

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Category	ID							
							<p>exposure walking and cycling routes.</p> <ul style="list-style-type: none"> • For stand-alone green infrastructure projects consider using exposure reduction targets as project KPIs. 	<p>Further measure are being considered in the new Strategy for Parks & Open Spaces. We are investing in green spaces across the borough including new green spaces such as Charlottenberg Park in New Cross, as well as the transformation of Beckenham Place Park and the introduction of the Greening Fund that allows local community groups to bid up to £40,000 for green infrastructure⁸⁸. Several green infrastructures will be</p>

⁸⁸ <https://lewisham.gov.uk/inmyarea/openspaces/parks/beckenham-place-park>

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
								implemented across Lewisham as part of our NCIL Air Quality & Community Funding Pot 2022-2024 Projects.
Emissions from developments and buildings	7	Ensuring that Smoke Control Zones are appropriately identified and fully promoted and enforced.	Environmental Protection /Crime Enforcement Regulation (CER) /Food and safety	£: Ongoing resource from the teams involved.	(2)	(ST); The whole of borough is already a Smoke Control Area. (Smoke Control Order 2010).	Respond and report on complaints and action taken. To include: an awareness campaign, engagement with suppliers, and active enforcement and campaign initiated by end 2022. • Develop information packs and plan engagement with businesses, residents and other members of the	We will record all complaints of dark smoke investigated within a standard timeline by the enforcement team as appropriate. • Enforcement action taken where appropriate. • Annual reports of smoke control areas and clean air complaint to be procured.

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Category	ID							
							<p>public.</p> <ul style="list-style-type: none"> • All fuel suppliers in the borough engaged, and 50% showing point of sale information about cleaner fuels. <p>100% of black smoke complaints investigated.KPIs include: Environmental Health Officers/Trade Standard officers to be trained for enforcing the new AQ solid fuel regulations starting May 2021.</p> <ul style="list-style-type: none"> • Reduce the number of smoke related complaints by 50%. • Estimated reach of awareness campaigns 	<p>We will continue to search funding to carry out other work and be part of the London wood burning group.</p> <ul style="list-style-type: none"> • Residents engagement via council newsletter articles, and press release with local papers. • Further details will be provided in LBL Local plan (ongoing).

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Category	ID							
							<ul style="list-style-type: none"> • Number of suppliers engaged. • Increases in the number of enforcement visits/actions taken. • Number of Officers trained in enforcement 	
Emissions from developments and buildings	8	Promoting and delivering energy efficiency and zero carbon 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 otherenergy	Climate Resilience/GLA /	£: Ongoing resource from Sustainable Resources Team. Additional external funding will be needed.	(3)	(ST). Review date of April 2022 for potential projects.	<p>We will produce yearly statistics and/or qualitative data on actions taken to raise awareness, number of complaints and enforcement actions taken by the council.</p> <p>KPIs include:</p> <ul style="list-style-type: none"> • Reduce CO₂ emissions by 40% by 2025 and being Zero-Carbon by 2050. 	<p>Tracks the percentage of the boroughs social housing stock which has been updated through the RE: NEW scheme. (GLA)</p> <ul style="list-style-type: none"> • Increase in the number of vulnerable households accessing external grant funding for heating, insulation and ventilation works.

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Category	ID							
		conservation measures.					<ul style="list-style-type: none"> No. of schemes using RE:FIT and RE:NEW, as the programme guarantees the amount of CO₂ emissions reduced (GLA) 	
Emissions from developments and buildings	8.1	Develop and implement strategies for decentralised energy that convert gas heating to low and zero carbon alternatives including heat networks, and upgrade existing large combined heat and power communal heating to cleaner technology alternatives.	Climate Resilience Team/Planning	£££	(2)	(LT)	<p>Development and Adoption of Decentralised energy strategy by end 2022.</p> <p>KPIs :</p> <p>We will use indicators to be included in the strategy to monitor progress.</p>	Heat networks form an important part of the LBL's plan to reduce carbon and cut heating bills for customers.
I do quite land soundsf Emissions from developments and buildings	8.2	Introduce a requirement for a minimum EPC rating for privately rented sector HMOs	Private Sector/Housing (Environmental Health Residential)	Ongoing resource from Private Sector Housing	(2)	(LT)-term	We will keep a register of all private rented properties with minimum EPC rating.	Lewisham intends to apply to the Secretary of State at the Ministry of Housing, Communities and Local Government

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
		<p>covered by both the mandatory and additional licensing schemes.</p> <p>Introduce a requirement for any works covered by the Disabled Facilities</p> <p>Grant or discretionary housing improvement grants to meet level D EPC rating in privately owned accommodation.</p>		(Environmental Health Residential)			<p>We will promote the regulation Energy Performance Regulation requirement.</p> <p>The target is to help all disabled facilities across the borough to meet level D EPC rating in privately owned accommodation and report annually.</p> <p>KPIs include:</p> <ul style="list-style-type: none"> • Number of commercial and residential properties with minimum Energy Performance. • Number of private properties with disabled facilities that meet level D EPC rating in privately owned accommodation. 	for a borough-wide licensing scheme for privately rented with the intention to rolling out licensing to all 26,000 privately rented properties in the borough.

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Category	ID							
							<ul style="list-style-type: none"> • Number of commercial and residential landlords spoke to or number of event to promote the regulation. 	
Emissions from developments and buildings	9	Master planning and redevelopment areas aligned with Air Quality Positive and Healthy Streets approaches.	Planning/EP/transport/Energy/Climate Resilience/ GLA/ TfL	£££ to ££££ We will engage with GLA and TfL resources to support the development and deployment of these policies.	(3)	(LT)	<p>Reporting as recommended in the London Plan approved in December 2020.</p> <ul style="list-style-type: none"> • Report via the ASR and the planning portal the number of developments where air quality was considered at the design stage. <p>KPIs include:</p> <p>Air Quality Positive specific metrics of success will be expected to be proposed for each selected measure, and more detail on this will be provided in new</p>	<ul style="list-style-type: none"> • We will ensure that the planning teams considers new policies on air quality positive and healthy streets at an early stage in the development of plans. <p>We will aim to log all applications with 100% Target.</p>

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Category	ID							
							Guidance accompanying the London Plan.	
Emissions from developments and buildings	9.1	Installation of residential electric charge points on new developments	Planning/Parking/Transport	Ongoing resource from Planning, Parking and Transport.	(1)	(LT) For all planning major site developments 20% active charging points and 20% passive installed.	We will monitor and report on: the proportion of electric vehicles: number of lampposts or equivalent infrastructure which have been modified to enable EV charging; the number of rapid chargers installed; and the usage of existing EV chargers from the CPs in the borough. Adoption and publication of the Low Emission Vehicle Charging Strategy to ensure that everyone in the borough is no further than 500m from an electric vehicle charge point by 2022. Then expansion of the electric vehicle charging points throughout the borough with	We will locate electric charging points in a way that does not interfere with people walking or with disable people passing with wheelchairs. We currently have 153 charging points across the borough with 40 more to be implementation in 2022/23.

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Category	ID							
							at least 10 per year depending on funding.	
Public health and awareness raising	10	Public Health department taking shared responsibility for borough air quality issues and implementation of Air Quality Action Plans/ we will ensure that Directors of Public Health (DsPHs) have been fully briefed on the scale of the problem in our local authority area; what is being done, and what is needed.	Environmental Protection/Public Health	£	(1) to (2)	(ST). Already provided as part of the consultation for this document We will complete our air quality School Action Plan identifying measures to be taken to reduce pollution around school. We will discuss potential follow up to vulnerable groups' workshops and consider	<ul style="list-style-type: none"> Public Health is represented at Air Quality working Group. Pharmacy and prescribers – to provide air quality information to Public Health to distribute to relevant groups. Provide further material for engagement with vulnerable groups and active travel work. <p>KPIs include:</p> <ul style="list-style-type: none"> Health Protection Committee will be required to sign off all Annual Status Reports and the Director of Public 	<ul style="list-style-type: none"> Clinical commissioning Group (CCG) - This has a two-part objective, to raise awareness in a phased timeline to reach the following: <ul style="list-style-type: none"> -Deliver awareness training to the CCG. - Discuss asthma and air quality. Looking at how key messages can be included into the school asthma guidelines and raising awareness sessions.

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						additional groups.	Health will sign off the air quality action.	
Public health and awareness raising	10.1	<p>The Council's political leadership will champion the issue of air quality inside and outside of the borough.</p> <p>Our current Air Quality Champion, Cllr Louise Krupski was appointed in May 2018, and has actively been engaging with the community, schools, and construction companies to promote actions to help reduce air pollution across the borough.</p>	Members of the Council, as designated	Ongoing resource from Members in exercising this role.	(1) to (2)	Recommended by the Sustainable Development Scrutiny Committee and approved by M&C with a promotion campaign ongoing.	<p>Report back to GLA on review and outcome with actions, then recruited more School Air Quality Champion to:</p> <ul style="list-style-type: none"> • Raise awareness of local air quality by speaking to individuals and providing promotional materials. • Take part in air quality activities and events, where appropriate. <p>KPIs include:</p> <ul style="list-style-type: none"> • Lewisham Mayor's Air Quality Champion will continue working with the School Air Quality 	<p>We will:-</p> <ul style="list-style-type: none"> • Promote the Lewisham Air App, airTEXT and similar resources as a way to reduce exposure to air pollution. • Promote awareness of Sustainable transport alternatives. • Periodically report in writing or email on the activities undertaken as part of the programme.

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							<p>Champions in collaboration with the working group, providing material and offering support and training as appropriate.</p> <ul style="list-style-type: none"> • We will keep record of air quality champions recruited and report on actions carried out throughout the year. 	
Public health and awareness raising	11	<p>Engagement with businesses/Public Health Teams will be supporting engagement with local stakeholders (businesses, schools, community groups and healthcare providers).</p> <p>The support will be via the DsPHs when</p>	Public health /EP	Ongoing resource from Public Health and other teams involved	(1) to (2)	(ST) Different initiatives being considered and developed over period of Action Plan.	<p>We will continue to use several readily available resources (e.g. GLA pollution alerts, airText and Imperial College London Air webpage) to raise awareness about the health impacts of air quality, and monitor these health impacts more closely.</p>	<p>We will :-</p> <ul style="list-style-type: none"> • Search for more funding for further School Superzone projects. • record the number of schools taking part in School Superzone project and reporting if

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Category	ID							
		projects are being developed.					<ul style="list-style-type: none"> • Information and promotion packs to reduce emissions from business activities. Direct contact will be limited at first due to social distancing (if any at the time). • Promotion via business engagement team • Continue to distribute leaflets at events and stands • Funding app message services such as the Lewisham App • Re-publicising the Mayor's social media pollution alerts through the communication team and social media channels. 	funding becomes available

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Category	ID							
Public health and awareness raising	11.1	<p>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</p> <p>Strengthening coordination 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.</p> <p>Director of Public Health to sign off</p>	Public Health/Environmental Protection	Ongoing resource from Public Health and Environmental Protection Team	(1) to (2)	(ST). Already have a JSNA.	<ul style="list-style-type: none"> ASR Report reviews and update and JSNA update – with appropriate air quality considerations. <p>KPIs include:</p> <p>Report back on projects to GLA through ASRs.</p> <ul style="list-style-type: none"> JSNA to be reviewed and updated by end 2021. Minutes of AQ working Group. Public Health chair the AQ working Group. At least one PH specialist has air quality in their objectives 	<ul style="list-style-type: none"> Health and Wellbeing Strategy delivery plan will be reviewed for 2018 – 2020 to incorporate air quality. <p>Appointing one Consultant grade is part of the health protection remit.</p> <p>The ASR and AQAP Will be signed off at Health Protection Committee.</p>

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		Statutory Annual Status Reports and all new Air Quality Action Plans					The Job specification of at least one specialist to comply with requirement and actions included in work plan i.e. Health in all policy portfolio. • Signed AQAP and ASRs as of when completed through Health Protection Committee	
Public health and awareness raising	11.2	Engagement with businesses – Delivery and Servicing Plans (DSP) delivered through Planning process	EP/ Public Health/ Transport/ Planning	Dependent on project initiated	(2)	DSP Condition already introduced. Different initiatives being considered and developed over period of Action Plan.	Successful implementation of Cleaner Air Villages (CAVs) projects and reporting back to the funders and all relevant parties by due date. KPIs are as identified in each project description. Number of applications for the discharge of the DSP condition approved.	Report back on future projects to the funders (DEFRA/GLA). Lewisham is part of the CAV4 to be implemented from 2022-2024.

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Public health and awareness raising	11.3	Raise awareness on the impact of indoor air quality on human health	Environment protection/Public Health	£	(2)	(ST)	Compile and publicise information leaflet on indoor air quality improvement. KPIs include: Information pack compiled and made available on our webpage by end of 2021	We will raise awareness on Indoor air pollution in homes, workplace and other buildings.
Public health and awareness raising	12	Supporting a direct alerts service such as Lewisham App or AirText, and promotion and dissemination of high pollution alert services	Environmental Protection/ Public health / Communication	Ongoing resources from Environmental Protection Team.	(2)	(ST). We will use all the resources readily available to communicate and raise awareness.	<ul style="list-style-type: none"> • Information and promotion packs. • Promote via Public Health, schools and business engagement. • Disseminate leaflets to Pharmacies – via Healthy Living Pharmacy. • Continue to distribute leaflets at events and stands. • Funding the app message service. • Re-publicising the 	The Healthy Living Pharmacy (HLP) framework is aimed at achieving consistent provision of a broad range of health promotion interventions through community pharmacies to meet local need, improving the health and wellbeing of the local population and helping to reduce health inequalities.

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Category	ID							
							<p>Mayor's social media pollution alerts through communications and social media channels.</p> <ul style="list-style-type: none"> • Number of subscribers, Sign-ups to the app or similar alert systems in the borough • Engagement with vulnerable groups • Estimated reach of pollution alerts within the borough (via social media etc.) 	
Public health and awareness raising	12.1	Engaging with communities through the work of the Borough of Culture	Public Health	££	(2)	(ST)	<p>As required by the bid.</p> <p>KPIs include:</p>	This work was deferred to 2022 due to Covid-19. This is now ongoing.

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		2022 ⁸⁹ (BoC) and monitoring number of bids for: a call to action on climate change/working together to deliver change.					Report back on projects to GLA through ASRs". Report and increase on number of people signed up to Lewisham Air App. <ul style="list-style-type: none"> • Sign-ups to in the borough. • Engagement with vulnerable groups. • Estimated reach of pollution alerts within the borough (via social media etc.) • Reduction in hospital admissions. 	
Public health and awareness raising (School)	13	Encourage schools to join the TfL STARS accredited travel planning programme by providing	Transport/ Public Health	£££	(2)	(ST) Already in operation with 80% of schools in the borough	<ul style="list-style-type: none"> • Continue to promote the Schools STARS scheme. • Create activities to promote a sustainable and safe approach to travel. 	Complete and adopt our School air quality Action Plan.

⁸⁹ <https://www.london.gov.uk/what-we-do/arts-and-culture/current-culture-projects/london-borough-culture/london-borough-culture-winners-2022-and-2023>

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		information on the benefits to schools and supporting the implementation of such a programme				having an accreditation in 15/16	<ul style="list-style-type: none"> • Work with school to encourage schools to engage with the STARS scheme and gain accreditation. <p>KPIs:</p> <ul style="list-style-type: none"> • Accredit at least 2 schools per year • Increase the number of school travel plans to with Gold and Silver Status in Lewisham • Monitor measures identified by the School Action Plan. 	We currently have 19 Gold accredited schools across the borough. We will enable some schools to share their good news stories and activities - via the STARS website.
Public health and awareness raising (schools)	14	Complete and adopt the draft LBL Air Quality School Action Plan	EP/all	££ to £££	(2)	(ST).	Complete the LBL school action plan that will be used to monitor progress of measures implemented	All schools will be offered Bikeability ⁹⁰ training for, children and young people who

⁹⁰ <https://lewisham.gov.uk/myservices/roads-and-transport/cycling/free-cycle-lessons>

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
		School-specific actions are included in the draft LBL action plan.					<p>across the schools located in Lewisham and adopt by December 2021.</p> <p>Specific school actions to be started by end 2021 include:</p> <ul style="list-style-type: none"> • Encouraging schools to compile an in house Action Plan using prescribed GLA Helpdesk Toolkit and advice. • Air Quality Monitoring in/around schools. • Feasibility of further School Superzone project. • Idling Action Events and workshop on air quality • Carry out other air quality audits around 	live in the borough. Balance bike and/or Scooter training is an annual offer to schools for their lower school pupils.

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Category	ID							
							<p>schools in Lewisham where nitrogen dioxide concentrations are the highest (in accordance with the GLA audit toolkit).</p> <ul style="list-style-type: none"> • School Streets, temporary road closures and restrictions for parking with more than two per year to increase the current 47 school streets (plus 4 planned in 2022/23 with more to come). • Greening around schools: • School Streets and restrictions for parking: • Carry out a feasibility study for the creation 	

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							of a fleet of electric school vehicles for disable/vulnerable children	
Delivery servicing and freight	15	Update local authority procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation and incorporate the use of the Social Value tool kit for the delivery of additional economic, social and environmental benefits that can be created from the 4 objectives and associated KPIs.	Procurement and Commercial Services	£ Ongoing resources from Procurement Team	(1) to (2)	Review policies including PPQ and ITT by end 2021 for implementation beginning 2022 Yearly review of our internal procurement handbook and training contract managers about air quality consideration in procurement.	Contract managers will together monitor whether the social value stipulations may increase costs going forward. We will (1) raise awareness about sustainability during procurement buying events (online) to all vendor; (2) consider how what is proposed to be procured can improve the economic, social and environmental well-being of our communities; (3) work with communities and suppliers to identify any specific needs and	We will consult and work with service users, communities and the supply market to improve the design and production of our works and services contracts that have an impact on the community so that outcomes are delivered in the most efficient manner, including through innovative solutions. At all times, we will ensure that procurement requirements focusing on social value are relevant and proportionate, reflecting

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Category	ID							
							<p>how well-being can be improved through our procurement activities and (4) we will lead by example by routinely considering social value outcomes available from the procurement of goods, works and services and asset disposal in all contracts over £50,000, as well as at lower levels where specific opportunities exist.</p> <p>KPIs:</p> <p>A new Social Value policy at Lewisham was developed and adopted on the 6 February 2019 which covers these requirements</p>	need and the nature of the supply market.

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Category	ID							
							<p>and therefore will be included (where relevant) in each procurement under the relevant KPI for Social Value. The standardised templates will also cross-refer to the policy;</p> <ul style="list-style-type: none"> •Publication of new procurement strategy to include pollution reduction measures by end of 2021; • Number of contracts with air quality requirements included; • We will report on a number of events • LBL council will use their procurement policy and purchasing power to influence and incentivise 	

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Category	ID							
							suppliers to use cleaner vehicles wherever possible and provide a report in due course.	
Delivery servicing and freight	16	Reducing emissions from deliveries to local businesses and residents	Procurement Team	Ongoing resources from Procurement Team and Energy Efficiency	(1) to (2)	Asset Management Strategy 2015-2020 produced.	<ul style="list-style-type: none"> • Inclusion of Air Quality considerations in updated Procurement Strategy by end of 2021. • Rigorous vehicle standards included within procurement policies. • Number of contracts with air quality requirements included. <p>KPIs as:</p> <ul style="list-style-type: none"> • No. of businesses participating in projects or changing their fleet. • Progress on project <ul style="list-style-type: none"> - Number of residents engaged - Number of businesses engaged 	<ul style="list-style-type: none"> • Consider and completion of all Business Engagement Projects. • Promote the switch to lower emission vehicles, adopting smarter practices and reducing freight movements by better use of consolidated trips • Cleaner vehicles and consolidated deliveries, such as EV-only loading bays, ULEV only areas • A shift to electric vehicles is encouraged through the ongoing

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Category	ID							
							- Number of new charging infrastructure - Number of EV's installed	expansion of our charging network. The Low Emission Vehicle Charging Strategy aims to ensure that everyone in the borough is no further than 500m from an electric vehicle charge point.
Delivery servicing and freight (Borough)	16.1	Feasibility study of borough-wide freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/ or encourage businesses to participate in these.	Transport/ Procurement and EP	On going resources from Transport and Procurement Team Additional external funding will be needed.	(1) to (2)	(ST)	Feasibility report with KPIs and targets to be compiled by the end of 2022.	This action is pending the availability of appropriate funding. We will apply for future DEFRA funding to implement this measure.
Borough fleet actions	17	Increasing the number of hydrogen, electric, hybrid, bio-methane	Fleet (S.G.M Environment)	££££	(2)	(ST)	• Review use of electric pool cars for staff use and procuring more vehicles	• Publication of new procurement strategy to include pollution

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		and cleaner vehicles in the boroughs' fleet. Accelerate uptake of new Euro VI vehicles in borough fleet.		Additional external funding will be needed.			by end 2022. • Review Staff Travel Plan to include travel payments to incentivise use of cleaner vehicles and minimise mileage and investigate tax benefits of electric vehicles versus fossil fuelled vehicles – include salary sacrifice schemes for employees – by Mar 2022. KPIs as: • Lead by example and increase the no. of ULEV in council owned fleet by 80% by 2022 Report on the number of new Euro VI vehicles in borough fleet.	reduction measures by end of 2021. • Incentivise providers of passenger transport to use electric/low emission vehicles through the procurement process – Mar 2022.

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							Fleet will be 100% compliant with ULEZ by 2025. The whole fleet will be zero emission by 2030.	
Borough fleet actions	17.1	Reducing emissions from Council fleets by Smarter Driver Training, or equivalent, for drivers of vehicles in borough fleet i.e. through training of fuel efficient driving and providing regular re-training of staff.	Fleet (S.G.M Environment)	£££: Ongoing resources from Fleet Team	(1)	(ST)	Training still on-going to meet legal requirements. This training is mandatory for vocational drivers (HGV and PSV) and is organised by the environment division not by personnel. KPIs include: Amount of training provided, and feedback given.	

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Localised solutions	18	Expanding and improving green Infrastructure across the borough and in localised areas with high level of pollution (e.g. around the south circular for example)	Parks & Regeneration/ Planning	£££ Ongoing resource required from Parks to review and make recommendations. Additional external funding will be needed.	(1) Green infrastructure schemes can transform urban areas and help to provide improved public spaces.	Ongoing/ (ST). Already in operation. Impact of reduction will be ongoing.	<ul style="list-style-type: none"> Investigate options for green infrastructure in schools located in areas of higher pollution as part of the school action plan by Mar 2023. Assess the greening opportunities in pollution hotspots and Focus Areas and seek funding to deliver this, in addition to greening and improving clean air routes away from busy roads. <p>KPIs include:</p> <ul style="list-style-type: none"> No. of Green Infrastructure projects implemented by the council No. of trees planted. 	<p>Whilst it can be hard to quantify air quality exposure improvements from such schemes it may be useful to consider such schemes as part of the Healthy Street Approach or to look at the measures of success built into Green Infrastructure proposals.</p> <p>We will use the GLA 2019 guideline document “Using green infrastructure to protect people from air pollution” and other trial green technologies like CityTree benches/trees</p>

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							<ul style="list-style-type: none"> Adoption of the new parks and green space strategy to be delivered by end of year 2021 and to include measures to address air pollution and improve air quality i.e. tree planting, promotion of walking and cycling. 	
Localised solutions	19	Low Emission Neighbourhoods (LENs) or/and Business Low Emission Neighbourhood (BLEN)	EP/Transport	££££ Additional external funding will be needed.	(1) In combining measures locally, cumulative reductions will be achieved, which will be measurable.	(LT) Not being considered for this Action Plan, unless specific resources become available.	<ul style="list-style-type: none"> Carry out feasibility study into the viability of a LEN/BLEN in one of Lewisham's pollution hotspots Implementation of LEN/BLEN in Lewisham where funding identified. <p>KPIs include:</p> <ul style="list-style-type: none"> Quantifiable reduction in pollutant emissions in most of the borough <p>LEN/BLEN s is anticipated.</p>	<p>LEN/BLEN in pollution hotspots. Table 1.1 presents some past and current projects undertaken on GLA focus areas.</p> <p>Area 133 (Brockley Road (B218) between Adelaide Avenue and Wickham Road will be considered for localised projects.</p> <p>There are mixed views on LTNs across the</p>

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							A further indicator of success for other boroughs is development of outline ideas/plans.	Borough, comments noted and already considered in the draft plan. Lewisham supports the implementation of measures which aim to reduce the number of unnecessary car journeys and reduce through traffic from using smaller roads. Speed enforcement is undertaken by the Police.
Localised solutions	19.1	Work with all the relevant organisations to improve air quality on strategic roads such as the South Circular and other major roads around.	GLA/TFL/ Transport/EA	££ to ££££ Additional external funding will be needed.	(3)	(ST)	Ella Adoo-Kissi-Debrah, who lived near the South Circular Road in Lewisham, died in 2013 and Southwark Coroner's Court found that air pollution "made a material contribution" to her	Up to 75 other monitors will be deployed across the borough an around the south circular to increase understanding of air pollution. A Breathe London monitor was also installed at the

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							<p>death. The following measures will be taken by LBL to comply with the Coroner's recommendations presented in the prevention of future deaths report⁹¹.</p> <ul style="list-style-type: none"> • One of the key areas of concern raised by the Coroner centres on the issue of a lack of public awareness about the health effects of air pollution, including low awareness of sources of information and action that could be taken to reduce personal exposure. It was recognised that, due to the scale of the 	<p>vicinity of the South Circular in June 2021 and will be used to monitor emission in real time.</p> <p>The LBL AQ Working Group will oversee the implementation of the recommendations from the prevention of future deaths report following the inquest in 2020.</p> <p>The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration.</p>

⁹¹ <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

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Category	ID							
							<p>challenge, this needs to be addressed by all levels of government.</p> <ul style="list-style-type: none"> •Lewisham Council to continue disseminating the Mayor’s existing moderate and high pollution alerts as well as by supporting and promoting a direct alert service such as Lewisham App, AirText and GLA alerts. •Lewisham Council to ensure information about air pollution and how to avoid exposure is provided to residents, especially those most vulnerable, via local public health channels. 	
Cleaner transport: Policy	20.0	Ensuring that transport and Air Quality policies	EP	££££	(2)	(ST)	Effective communication between teams will be achieved by ensuring that	We will ensure that there is effective communication between

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		<p>and projects are integrated.</p> <p>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.</p>					<p>(1) air quality risks are fully evaluated in all transport feasibility studies/ proposals and (2) that regular briefings are provided to the Transport Team on local air quality issues and projects.</p> <p>KPIs include:</p> <p>Heads of Transport will sign off AQAPs/ASRs and review them annually. We make it a requirement for an air quality official to attend transport steering groups/forums, and vice versa.</p>	those managing air quality issues within the borough and those managing traffic and travel.

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Cleaner transport: Zoning	20.1	Lobbying/working with TfL on: Speed control measures on more Strategic roads, and Low Emission Zones. E.g. lowering the legal speed limit to 20mph in built up residential areas.	TfL/GLA	£££ Ongoing resources from Transport Team	(2)	(ST)	Reduction of overall vehicle speed and driver fines in all Lewisham roads. General speed reduction and speed fine on all roads.	
Cleaner transport: Programme	21	Discouraging unnecessary idling by taxis and other vehicles and carry out a Council wide anti-idling campaign discouraging unnecessary idling around all venerable receptors. Idling Action Events/workshops and	Environmental Protection/ Transport Enforcement / Communication	££££ Ongoing resources required from Environmental Protection and Communications Team	(2)	(LT)	Report back to GLA on review and outcome of campaign to discourage idling. <ul style="list-style-type: none"> • Participate in the Pan London Anti-Idling Project to raise awareness and include enforcement. • Reduce emissions from Taxis and other vehicles idling unnecessarily through raising awareness and taking enforcement 	This anti-idling project involves 27 boroughs and will build on the previous MAQF idling project, continuing the idling action volunteer events to engage the local community. In addition engaging and training for fleets (both borough and commercial);

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Category	ID							
		enforcement around schools.					<p>actions.</p> <ul style="list-style-type: none"> • Continue training Enforcement Officers on car idling and how to issue parking fines. • Advisory notes to be issued to drivers and enforcement officers to issue fines for idling offences. • Where marketing campaigns are undertaken the effects of these could be tracked; the number of hospitals displaying anti-idling videos for example; and; • Regular meetings and formal processes in place to ensure effective communications. <p>KPIs as:</p>	<p>school assemblies and workshops to create anti idling banners; development and implementation of a wider communications/ advertising strategy to raise awareness and further increase outreach for the campaign; a research project investigating the impacts of idling and behaviour change; and enforcement work to be done by the boroughs.</p> <p>School specific KPIs include:</p> <p>Number of:</p> <ul style="list-style-type: none"> • Idling Action Events, • School Workshops,

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Category	ID							
							<ul style="list-style-type: none"> • 100% of complaints about idling followed up with enforcement visit • Number of vehicles asked to stop idling • Number of notices issued for vehicle idling and near schools • Where marketing campaigns are undertaken the effects of these could be tracked; the number of hospitals/petrol stations displaying anti-idling videos for example. • Monitoring along the lines of Idling Action Days will be considered. • We will focus on enforcing idling on pollution hotspots and transport hubs and other 	<ul style="list-style-type: none"> • Business engaged and fleet trained. • Advertising Campaign. • Research Project output. • Staff undertaking on-street enforcement

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							vulnerable receptors for example.	
Cleaner transport: Programme	21.1	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs.	Transport/ Planning	££ Additional external funding will be needed.	(2)	(ST)	KPIs include: Proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs	
Cleaner transport: Programme	21.2	Working with TFL to promote car scrappage schemes or other retrofit technologies and lobbying government to provide funding for car scrappage schemes.	Transport/TfL	££ Additional external funding will be needed.	(2)	(ST)	Report yearly statistics of car resident/businesses who have participated in the scheme on a yearly basis. We will carry out more research of retrofit technologies and publish on our website. KPIs include:	The ULEZ expansion up to, but not including, the North and South Circular Roads comes into force on 25 October 2021. On Friday 16/07/2021, the Mayor announced an additional £5 million in funding for his scrappage schemes to help more low income and disabled Londoners switch to cleaner vehicles. More

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							Increase in the number of cars scrapped/with retrofits with time.	information and eligibility is available on the TfL website ⁹² .
Cleaner transport: Programme	22	Pedestrianisation: Temporary car free days and pedestrian Days (e.g. no vehicles on certain roads on a Sunday) and similar initiatives.	Transport / Environmental Protection	££ Additional external funding will be needed.	(2)	Review opportunities through community groups.	<ul style="list-style-type: none"> • We will increase the number of schools taking part in a school-managed play street and the number of community play streets. • We will target approximately 10 school play streets and 30 public play streets to start with. • We will also facilitate community car free days in September 2021 subject to resources. <p>KPIs include:</p>	

⁹² <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/car-and-motorcycle-scrappage-scheme>

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							Number of school street/plays streets and community event undertaken. We currently have 47 school streets with four more due before the end of the year 2022/2023 (we will aim to add at least three more per year).	
Cleaner transport: Infrastructure	22.1	Pedestrianisation / Traffic calming measures/Road system redesign.	Transport /TfL	£££-££££	(2) to (3)	(LT) to (LT)	Project specific outputs and targets to be agreed in due course. KPIs include: Count/scale of the infrastructures implemented.	See action 14 for street closures around schools.
Cleaner transport: Infrastructure	22.2	Pedestrianisation/ Lee Green Low Traffic Neighbourhood (LTN)	Transport / Environmental protection	£££-££££ Additional external	(2) to (3)	(MT) to (LT)	As part of the LTN, LBL has been developing and implementing a range of measures to help mitigate against some of the	Project specific outputs and targets to be agreed following public consultation.

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Category	ID							
				funding will be needed.			<p>effects of the COVID-19 pandemic as well as for strategic benefits (e.g. safer streets, encouraging more walking/cycling/ public transport and improving air quality).</p> <p>KPIs:</p> <p>Improvement of the following metrics and ensuring no loss of benefits through continuing to assess impact on:</p> <ul style="list-style-type: none"> • Air quality data; • Traffic flow and speed data on Lewisham managed roads; • Bus journey times and traffic flow/ congestion levels on Transport for London 	These interventions focused on ensuring the public have enough space to socially distance as well as improving safety for the higher volumes of pedestrians and cyclists during the lockdown period

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Category	ID							
							(TfL) managed roads; and <ul style="list-style-type: none"> Initial feedback from the project pages on Commonplace. 	
Cleaner transport: Policy	23	Using parking policy to reduce pollution emissions and adoption of low charges at existing parking meters for zero emission cars. There will be emissions based parking for Short Stay Parking and for motorcycles.	Transport/ Parking Enforcement	££ This involves a CO ² based regime on short stay parking visitors, in order to deter the use of such vehicles and reduce. The emissions arising. In addition a levy on diesel vehicles is proposed.	(2)	(ST) Only achieved through the cashless meter model.	Report to GLA through ASRs. We will update the existing parking strategy to include air quality considerations. The surcharge proposed should encourage a shift to cleaner vehicles. By encouraging electric vehicles, the borough is also promoting a solution. KPIs:	It is hard to measure the emissions reduction from parking surcharges directly. However, it is expected that measures such as surcharges for diesel vehicles could lead to a drop in the overall number of higher polluting vehicles in London. The annual parking report provides data and breakdown of vehicle types against total permits issued.

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							<ul style="list-style-type: none"> • Monitoring parking levels of most polluting vehicles. • Proportion of residential permits issued to both most polluting and cleanest vehicles. • Comparison of charges with other boroughs. • Achieving the 500m radius by the end of 2021. • Number of parking charges. 	
Cleaner transport: Traffic management	23.1	Emissions based parking for Short Stay Parking and for motorcycles.	Transport/ Parking Enforcement	£££	(2)	(ST)	This proposal considers the particular adverse environmental and health impacts of fossil fuel emissions on short stay parking and proposes implementing an emission based parking regime similar to that for parking permits within Lewisham.	This is aimed at tackling air pollution by encouraging people to switch to less polluting models or more sustainable forms of transport. It will also bring all motorcycle parking

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							More information on this measure is available via our website ⁹³ .	charges in line with other vehicles, which have had emissions-based permits since last year.
Cleaner transport: Traffic management	23.2	Controlled Parking Zone Extension for Climate Change Emergency.	Transport/ Parking Enforcement	££	(2) There would be a by-product of increased income associated with this corporate objective.	(ST): To start in later 2021/22	Our target is to meet the challenge of the Climate change in Lewisham. KPIs include: Number of permits issued	Extending our CPZs borough wide would be a key tool as part of the Councils approach to tackling the Climate Emergency and reducing the impact of the car on the environment and health.
Cleaner transport: Traffic management	23.4	Enhanced parking enforcement for Safer Lewisham and to improve walking and cycling.	Transport/ Parking Enforcement	££. This would need to include relevant revenue costs	(2) This would primarily be targeted towards improving road safety and reducing	(ST)	We will provide a report of number of accidents that occur before and after the implementation of the traffic management measure and assess the effectiveness in increasing	More information about this is available on our website. Discouraging the use of car by parking enforcement should

⁹³ <https://councilmeetings.lewisham.gov.uk/mgAi.aspx?ID=26630>

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
				such as staff, licensing, IT etc. but is used elsewhere with considerable success.	injuries within the borough and meeting our and the Mayor for London's targets.		road safety and improve air quality. KPIs include: Number of accidents; Report on yearly enforcement actions taken.	encourage walking and cycling and reduce vehicle emissions.
Cleaner transport: Infrastructure	24	Installation of Ultra-Low Emission Vehicle (ULEV) infrastructure. The installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV ⁹⁴). This	Planning/ Parking/ Transport	£££-££££ Additional external funding will be needed.	(1) to (2)	(LT) We are already in communication with TfL about rapid charging points in potential for establishing points.	KPIs include: Number of charging points installed per year including (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations).	The number of new charging points will depend on planning obligations. We will aim to install at least five per year. Via the planning process, we will recommend, one Electric Vehicle charging point per

⁹⁴ Office for Low Emission Vehicles (OLEV)

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
		action is not related to new development					<p>We currently have more than 100 charge points (a combination of 50kw, 7kw and 5kw points)⁹⁵.</p> <p>Adoption and publication of the Low Emission Vehicle Charging Strategy to ensure that everyone in the borough is no further than 500m from an electric vehicle charge point by 2022. Then expansion of the electric vehicle charging points throughout the borough with at least 10 per year depending on funding.</p>	<p>dwelling with dedicated parking or one charging point per 10 spaces (unallocated parking) for all new residential developments. For commercial development, 10% of parking spaces to be provided with Electric Vehicle charge points.</p> <p>Our intention is to install 40 in 2022/23</p>
Cleaner transport: Programme	24.1	Continue campaigns to promote the use of electric charge points within the borough.	Parking/ Transport/ Environmental Protection/	££££ Ongoing resource from	(2) Having a strategy policy which allows for further growth	(LT)	<p>KPIs include:</p> <ul style="list-style-type: none"> • Monitoring proportion of electric vehicles 	

⁹⁵ <https://lewisham.gov.uk/myservices/roads-and-transport/sustainable-transport/our-long-term-strategy-for-low-emission-vehicles>

Action		Measure description	Responsibility	Cost <i>Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)</i>	Expected emissions/ concentrations benefit <i>[Magnitude of Low (1), Medium(2) and High (3)]</i>	Timescale for implementation <i>[Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]</i>	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
			Communication s	Transport and Parking	in EV charging points when a certain number of electric vehicles are registered in an area allows for continued growth of the new technology. An app based booking system allows users to see other nearby charging stations should one already be in use upon arrival.		registered by residents in the borough. <ul style="list-style-type: none"> Monitoring proportion of lampposts or equivalent infrastructure which have been modified to enable EV charging and the number of rapid chargers installed Monitoring the usage of existing EV charges from the CPs. 	
Cleaner transport: Infrastructure	25	Provision of infrastructure to	Transport/ Planning	£££-££££	(1) to (2) Reducing car use is one of the	Ongoing (subject to TfL)	Targets as presented in the cycling strategy.	It is difficult to quantify with certainty the reduction in emissions as

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
		support walking and cycling		Additional external funding will be needed.	best ways to cut both emissions. Sustainable Travel Towns studies show that car driver distance could be reduced by five to seven per cent, which can provide large reductions in NOx/PM emissions.	funding/ priorities)	Reported to TfL through a LiP yearly report. KPIs: Targets ⁹⁶ as presented in the cycling strategy and the LiP yearly report. Current target are as follow. With the base year (2017) and target year (2021): Daily cycle journeys is 183911 for base and 370002 for 2021, Cycling to work is 4.0% for base and 3 10.0% for 2021, Casualty rate is 2.25 for base and 1.16 for 2021 and	this depends on many other factors. The cycling strategy looks at where cycling in the London Borough of Lewisham (Lewisham) is at and where it aspires to take it in the near future.

⁹⁶ <https://councilmeetings.lewisham.gov.uk/documents/s51611/05%20Lewisham%20Cycle%20Strategy%202017%20Summary%20200717.pdf>

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							Cycling to school is 3.2% for base and 7 4.8% for 2021.	
Cleaner transport: Policy	25.1	Update of Cycling Strategy and policies for the borough.	Transport	££	(1) to (2)	(ST):	The strategy was developed in 2016/17 and published in 2018. An update will be undertaken by end 2022. The updated cycling strategy will include updated KPIs.	New Cycling Strategy to include a reference to LTN1/20 and other guidelines and standards as appropriate.
Cleaner transport: Infrastructure	25.2	Increasing cycle parking on street and in new developments in line with London Plan Standards.	Planning/ Transport	£££-££££ Additional external funding will be needed.	(1) to (2)	(ST) Ongoing. Already being provided but will be increased year on year.	194 Sheffield stands installed in 2021 at key train stations and town centres. Internal reporting and LiP yearly reporting on increase in parking/bike hangars installed across the borough, with at least one hangar in every ward.	We currently have 121 bike hangars in the borough. There is a commitment in the AQAP to install at least one hangar per ward every year. A total of 50 new cycle hangars are to be installed in the near future (i.e. 2022/23).

Action		Measure description	Responsibility	Cost Very Low=≤£10K(£) Low = £10- £50K (££); Medium = £50K - 500K (£££); High <500k (££££)	Expected emissions/ concentrations benefit [Magnitude of Low (1), Medium(2) and High (3)]	Timescale for implementation [Short term=0-2 years (ST); Medium term= 2-5 years (MT); Long-term= 6+ years (LT)]	Outputs/Targets/Key Performance Indicators (KPIs)	Further information
Category	ID							
							KIPs include: Provide statistics on the number of cycling parking/stands across the borough.	Cargo cycle parking should be researched further but not required in the AQAP.

Appendix A Response to Consultation

Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between **1 September and 28 September 2021, then extended to Wednesday 6 October 2021**. A communication/engagement/consultation plan has been appended to this draft report.

Three main groups **will be** consulted during the development/ review of the Air Quality Action Plan.

These comprise of: -

- Internal stakeholders who will deliver the actions detailed in the plan.
- Statutory consultees as required by the legislation and
- The external stakeholders due to significant public interest in health issues and local air quality.

a) **Internal Stakeholders:** The consultation of each relevant service area **will be** carried out before and during the development of the plan. This included the following service areas:

- Environmental Health
- Environmental Protection
- Crime Enforcement Regulation (CER)
- Fleet (S.G.M Environment)
- Housing Private Sector (Environmental Health Residential) and Private Sector Housing (Grants)
- Parking
- IT
- Planning and Development Management
- Parks & Regeneration
- Strategic Procurement and Commercial Services
- Public Health
- Sustainable Resources/Climate Resilience
- Transport (including Smart travel, Parking Services Finance, Sustainable Transport – Operations, Sustainable Transport - Major Schemes Projects & Transport Planning)
- Others (including Corporate Resources, Strategy & Communications and Enforcement Response)

Comments and queries made by each service have been addressed prior to external consultation. All staff working for the Council are being further consulted during the public consultation.

b) **Statutory consultees as required by legislation:** It is a legal duty under Environment Act 1995 and the London Local Air Quality Management Framework to consult specific parties and agencies

during the development of any air quality strategies and action plans. The following parties are being contacted directly by email as planned.

- Residents
- Local MPs and Members
- Secretary of State
- Environment Agency
- Transport for London
- All neighbouring local authorities, the South London Cluster Group
- Bodies representing local business interests and other organisations such as South London Chamber of Commerce and Enterprise
- The Greater London Authority (GLA) is being consulted during the review and consultation stages. Following the consultation exercise, the final draft plan will be agreed with the GLA and the resulting Consultation Report appended to this plan.

Table A.1 Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

A consultation responses report is attached to this action plan.

Consultee	Category	Response
Climate Action Lewisham	Statutory	Refer to the consultation report
Environment Agency (EA)	Statutory	Refer to the consultation report
Catford Active Travel	Statutory	Refer to the consultation report
Public Health England (PHE)	Statutory	Refer to the consultation report
Lewisham Cyclists	Statutory	Refer to the consultation report
Natural England	Statutory	Refer to the consultation report
Paper documents	Public consultation	Refer to the consultation report
Resident 1	Public consultation	Refer to the consultation report
Responses to public consultation are appended to the plan	Public consultation	(Refer to Appendix B of the Consultation response report)

What we heard

A combination of interlinked and complementary measures are key to creating positive short term and long term impacts on air quality and carbon reduction in Lewisham.

Using the following list of topics proposed by the GLA in its template matrix to reduce air pollution in London, the findings of the survey were as follows:

- **Monitoring and other core statutory duties:** Several respondents reiterated the need for the Council to increase air quality monitors around sensitive receptors including schools, nurseries, care homes, hospitals, around major roads and in areas with high levels of deprivation and for the council to adopt the new WHO guidelines⁹⁷ published in September 2021. Increased public information about the human health risks from air pollution was also mentioned in several responses.
- **Emissions from developments and buildings:** It was suggested that the Council use planning tools to encourage sustainable development and impose air quality mitigations measures for all developments (e.g. reduce indoor pollution by adopting and providing incentives to replace combustion plants like old boilers to low emission alternatives; reducing emission from construction activities, non-road mobile machinery(NRMM), reducing indoor pollution, installing more electric charging points and green infrastructure in new developments) and air source heat pump installation in housing estates.
- **Delivery servicing and freight:** There was feedback that the Council should work with partners to reduce emissions from vehicles delivering goods and services, including light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions.
- **Borough fleet actions:** The Council should lead by example by tackling its own fleet (i.e. replacing with low emission alternatives), and taking all the necessary actions to reduce other sources of air emissions and its carbon footprint.
- **Localised solutions:** There were several responses about the Low Traffic Neighbourhood (LTN) that will be included in the considerations for the specific consultation into the LTN conducted earlier this year. It was suggested that Lewisham Council should work with all relevant authorities to resolve traffic issues on major strategic roads such as the south circular which will lead to reducing congestion, vehicle idling and air pollution. A couple of respondents suggested that the expansion of the LTN would be positive because it would help to improve air quality and enable the Council to commit to radical actions which actively discourage car ownership. The changes suggested include fewer parking spaces, more LTN's, and expanding ULEZ to the entire Borough.
- **Cleaner transport:** Road transport is the main source of air pollution in London, therefore, this was the topic that generated the most feedback during the consultation. Suggestions include increasing and promoting active travel, reducing and discouraging car usage, improving road safety and increasing walking and cycling infrastructure, promotion of low emission vehicles, combusting plant and infrastructure. Our school

⁹⁷ <https://www.who.int/news/item/22-09-2021-new-who-global-air-quality-guidelines-aim-to-save-millions-of-lives-from-air-pollution>

street programme was appreciated and further pedestrianisation was suggested to encourage active travel. Again, addressing the traffic impacts of the LTN and traffic on the south circular were the predominant suggestions. There were some negative comments about the ULEZ expansion, and some positive comments stating that the scheme should be enforced to ensure that no non- ULEZ compliant buses or taxis drive in the Borough.

- **Other important feedback from the consultation include:**

- Replace old boilers(s) with ultra-low emission boilers and use of bicycles for local journeys or taking the bus regularly scored the highest on the lifestyle or behaviour changes that the residents would like to adopt to reduce air pollution. (Most respondents stated that they were already taking most of the actions listed in the survey).
- Carry out energy audits, designing in-house travel plans for staff in addition to encouraging staff to use public transport where possible, were the highest ranking lifestyle or behaviour changes that businesses and other organisations would like to adopt to improve air quality.
- Increase green infrastructure and stop the removal of green infrastructure around sensitive receptors and major roads.
- Reduce pollution in and around schools by extending school audits to other schools in polluted areas, and improving walking and cycling infrastructure were some of the highest ranking suggestions included on the Council's priority list of actions.
- Improve Lewisham's waste management procedures, street cleansing and other services.

- **Demographics of the survey:**

- **Age:** The majority (17.43%) of respondents were between 45-49 years of age. People aged 18-24 and 75-79 represented the age groups with the lowest (8.3% for each) proportion of responses. 6.22% of respondents provided no answer to the age question and 5.39% did not to state their age. The residual percentage was distributed among other categories.
- **Ethnicity:** 7.14%% provided no answer and 7.14% preferred not to state their ethnicity. Of those that did, the majority of respondents (71 %) were white with the rest distributed across other ethnic groups.
- **Gender:** There were slightly more male (44.96%) than female (43.70%) respondents. Some did not answer or preferred not to state their gender;
- **Disability:** 7.14% were disabled (disabilities distributed across all categories), 9.24% provided no answer, 6.30% preferred not to say, the majority of respondents did not identify as disabled. Easy read, step-free access,

accessible toilets, wheelchair access were among suggestions given to improve accessibility of the consultation.

- **Religion:** The majority (48.55%) did not state a religious preference, 9.54% preferred not to say anything about their religion and 17.43% provided no answer. Of those that did respond 19.09% were Christians, the remainder were distributed among other religions.
- **Sexuality:** The majority (62.24%) of respondents identified as heterosexual, the remainder of respondents was distributed among other categories. 11.62% preferred not to say their sexuality and 16.60% who provided no answer.
- **Gender Identity:** The majority (67.22%) of respondents identified with the same gender as the one that they had at birth. The remainder were distributed among other categories with 10.79% preferring not to say their gender at birth, 21.16% provided no answer. 0.83% had different a gender identity from the one that they had at birth.
- **Areas:** The majority of respondents (14.11%) live in Lee Green, and 12.45% live in Lewisham Central. The remainder were distributed among other locations with 2.49% not living in Lewisham. 12.45% provided no answer.

Conclusions: The age distribution of the respondents corroborate with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with other groups of the population. The results may also be attributed to cultural differences or social and economic inequalities, with the people from Black and Minority Ethnic (BME) backgrounds (which are more impacted by air quality in accordance with recent research), more likely to be interested in meeting their financial and socio-cultural needs than taking part in surveys with others potentially not having English as a first language. The findings related to disability raised the issue of resources needed to better meet the needs of this group. Most respondents were from the Lee Green and Lewisham Central areas, which is representative of the populations most affected by the LTN. The general negative perception of the LTN by this group may have impacted the results of the survey.

What we have done with your suggestions

We have considered all the comments made and modified this plan as appropriate.

The adopted AQAP will be subject to annual review, appraisal of progress and reporting to Lewisham Health Protection Committee and Lewisham Strategic Air Quality Board.

Progress each year will be reported in the Annual Status Reports, as part of our statutory London Local Air Quality Management duties.

Appendix B Reasons for Not Pursuing Action Plan Measures

Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Localised solutions	Introduction of Low Emission Neighbourhoods	We have been unable to obtain funding for this measure.
Implement a Zonal Construction Logistics Plan	We will 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) and an Opportunity Area within the London Plan.	This project was discontinued because of TfL funding cuts due to Covid-19. This project will resume when funding become available.
"Borough fleet actions"	"Join the Fleet Operator Recognition Scheme (FORS) for the borough's own fleet and obtain Gold accreditation"	This Action has been discontinued.

Appendix C Links between Air Pollution and Other important LBL Strategies

New 2021 World Health Organization (WHO) Guideline

Public Health England exists to protect and improve the nation's health and wellbeing, and reduce health inequalities

New WHO Global Air Quality Guidelines (AQGs)⁹⁸ published in September 2021 provide clear evidence of the damage air pollution inflicts on human health, at even lower concentrations than previously understood. The guidelines recommend tighter air quality levels to protect the health of populations, by reducing levels of key air pollutants, some of which also contribute to climate change.

Whilst not legally-binding, like all WHO guidelines, AQGs are an evidence-informed tool for policy-makers to guide legislation and policies, in order to reduce levels of air pollutants and decrease the burden of disease that results from exposure to air pollution worldwide. Conscious that this will be a difficult task for many countries and regions struggling with high air pollution levels, WHO has proposed interim targets (IT) to facilitate stepwise improvement in air quality and thus gradual, but meaningful, health benefits for the population.

NO₂ concentrations versus (vs) WHO Air Quality Guidelines and Interim Targets (ITs)

The concentrations of NO₂ recorded in Lewisham are all above the new AQG of 10 µg m⁻³ but still below the first interim target (IT) of 40 µg m⁻³. The overall average concentrations have been below the first interim target since 2018.

The urban background monitoring site LW1 has also not seen an exceedance of the hourly AQO value of 200 µg m⁻³ since pre-2014. The WHO AQG remain 200 µg m⁻³.

Considering that the overall background concentration of NO₂ is more than 10µg m⁻³, it would be a challenge to try to achieve the recommended guideline by 2030 as shown in in Figure 16.

⁹⁸ <https://www.who.int/news/item/22-09-2021-new-who-global-air-quality-guidelines-aim-to-save-millions-of-lives-from-air-pollution>

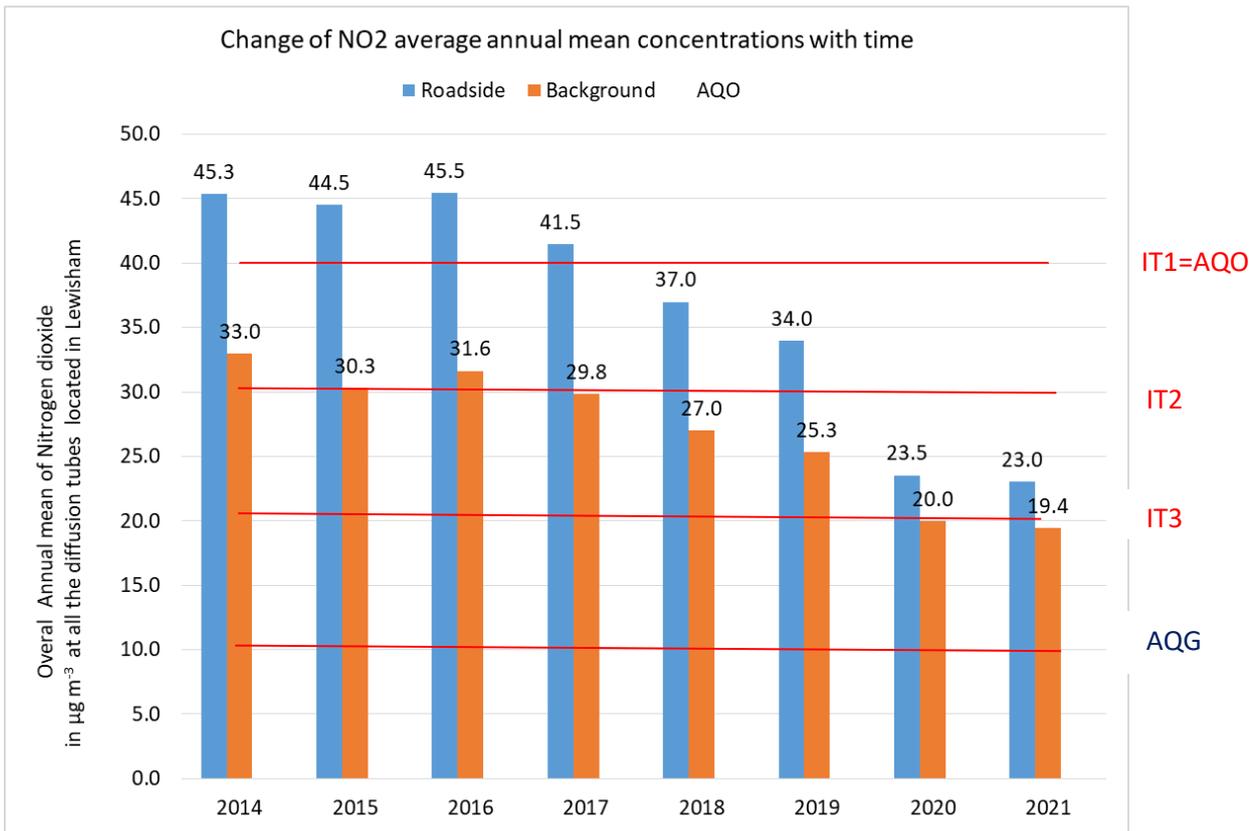


Figure 16 Trend of overall NO₂ annual mean concentrations with time vs WHO interim targets/AQG

Note: The horizontal lines denote World Health Organization (WHO) interim target (IT) 1, 2 and 3 then the Air Quality Guidelines (AQGs) of 40, 30, 20 and 10 µg m⁻³ respectively. The IT is currently equal to the current AQS.

PM₁₀ Concentrations versus WHO Air Quality Guidelines and Interim Targets

Figure 17 presents a comparison of the Annual Mean PM₁₀ Automatic Monitoring Results (µg m⁻³) with the new WHO guidelines. The concentrations of PM₁₀ were all above the new AQG of 15 µg m⁻³ but still below the first, second and third interim targets (IT) of 70 µg m⁻³, 50 µg m⁻³ and 30 µg m⁻³ respectively since 2014. All concentrations have been below the third IT value of 30 µg m⁻³ in 2021.

LBL will work towards achieving the AQG by 2027 at the latest.

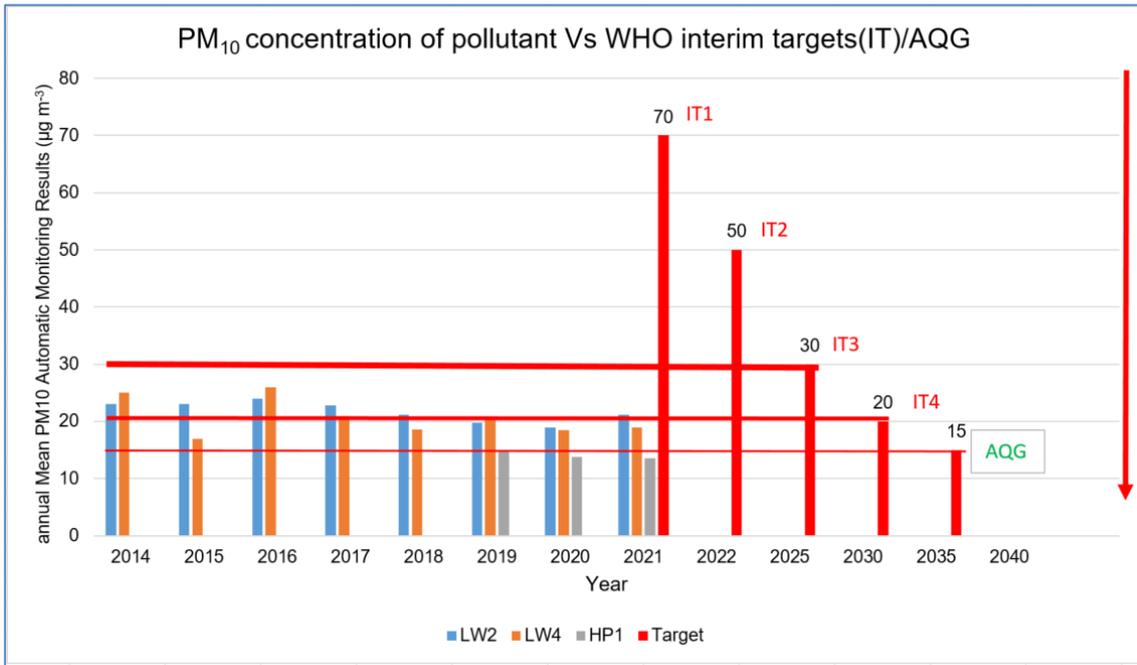


Figure 17 PM₁₀ Concentration vs WHO interim targets/AQG

Notes: The annual mean concentrations are presented as µg m⁻³. All means have been “annualised” in accordance with LLAQM Technical Guidance, if valid data capture is less than 75% and more than 33%.

The PM₁₀ Automatic Monitoring Results: Comparison with 24-Hour Mean Objective, Number of PM₁₀ 24-Hour Means > 50 µg m⁻³ are as follows.

Table C.1 The PM₁₀ Automatic Monitoring Results: Comparison with 24-Hour Mean Objective, Number of PM₁₀ 24-Hour Means > 50 µg m⁻³

Site ID	2014	2015	2016	2017	2018	2019	2020	2021	Interim targets (IT)				AQG
									1	2	3	4	
LW2	14 (38)	8	9	11	4	9	5 (30)	2 (71)	150	100	75	50	45
LW4	13 (41)	1	18 (47)	7	1	9	8	3					
HP1	-	-	-	-	-	7	4	0					

Notes the Interim targets (IT) are for 99th percentile, (i.e. 3-4 exceedances per year).

Exceedances of the PM₁₀ 24-hour mean objective (50 µg m⁻³ over the permitted 35 days per year) are shown in **bold**.

Where the period of valid data is less than 85% of a full year, the 90.4th percentile is provided in brackets.

(a) data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

(b) data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%).

In 2021, LW4 saw 3 instances where the 24-hour mean was greater than the AQO value of 50 µg m⁻³ (i.e. the IT target 4), whereas HP1 saw 0 instances during the year and LW2, 2 instances. However, these are well below the 35 permitted (the IT allow 3-4 exceedance days per year), meaning all monitoring stations achieved compliance with the 24-hour mean AQO/IT target 4. There has been a decrease in the number of 24-hour means greater than the AQO threshold value in comparison to 2019 and 2020 at all sites.

PM_{2.5} Concentrations versus WHO Air Quality Guidelines and Interim Targets

Figure 18 is a comparison of the Annual Mean PM_{2.5} Automatic Monitoring Results (µg m⁻³) with the new WHO guidelines. The concentrations are all below the interim targets 1 and 2 but however above the new 2021 AQG of 5 µg m⁻³, which are lower than the previous guideline of 10 µg m⁻³. Exceedance of the IT of 10 µg m⁻³ has occurred since 2014 to 2021 at LW2. All concentrations recorded at LW5 and HP1 have been below the interim target 4 of 10 µg m⁻³.

LBL will work towards achieving the IT by 2030 at the latest as shown in Figure 18.

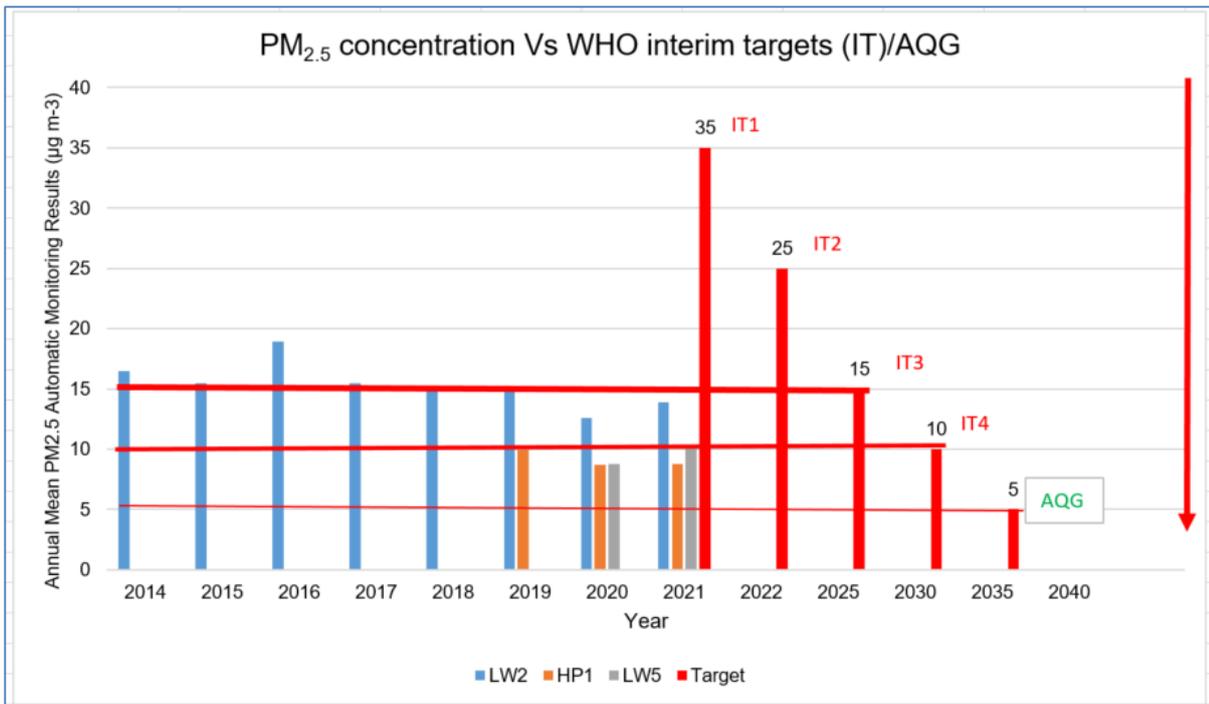


Figure 18 PM_{2.5} Concentrations vs WHO interim targets/AQG

Notes

The annual mean concentrations are presented as µg m⁻³. All means have been “annualised” in accordance with LLAQM Technical Guidance, if valid data capture is less than 75% and more than 25%.

Air Quality Policy Context

An overview of the relevant policy drivers for air quality work include European Legislation through the Ambient Air Quality Directive 2008/50/EC and the Fourth Daughter Directive 2004/107/EC, National Legislation -The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, the framework for Local Air Quality Management (LAQM) in the UK, the National Planning Policy Framework (NPPF), the Clean Act Strategy and the Environment Act 2021, the London Plan 2021 and the Local Plan Policy.

In compiling an air quality action plan, it is important to consider other relevant international, regional, and local policies because pollution is transboundary, that depend on many anthropogenic and environmental factors therefore only an integrate approach can help deal with the problem and reduce exposure. Some of the local strategies are presented as follows.

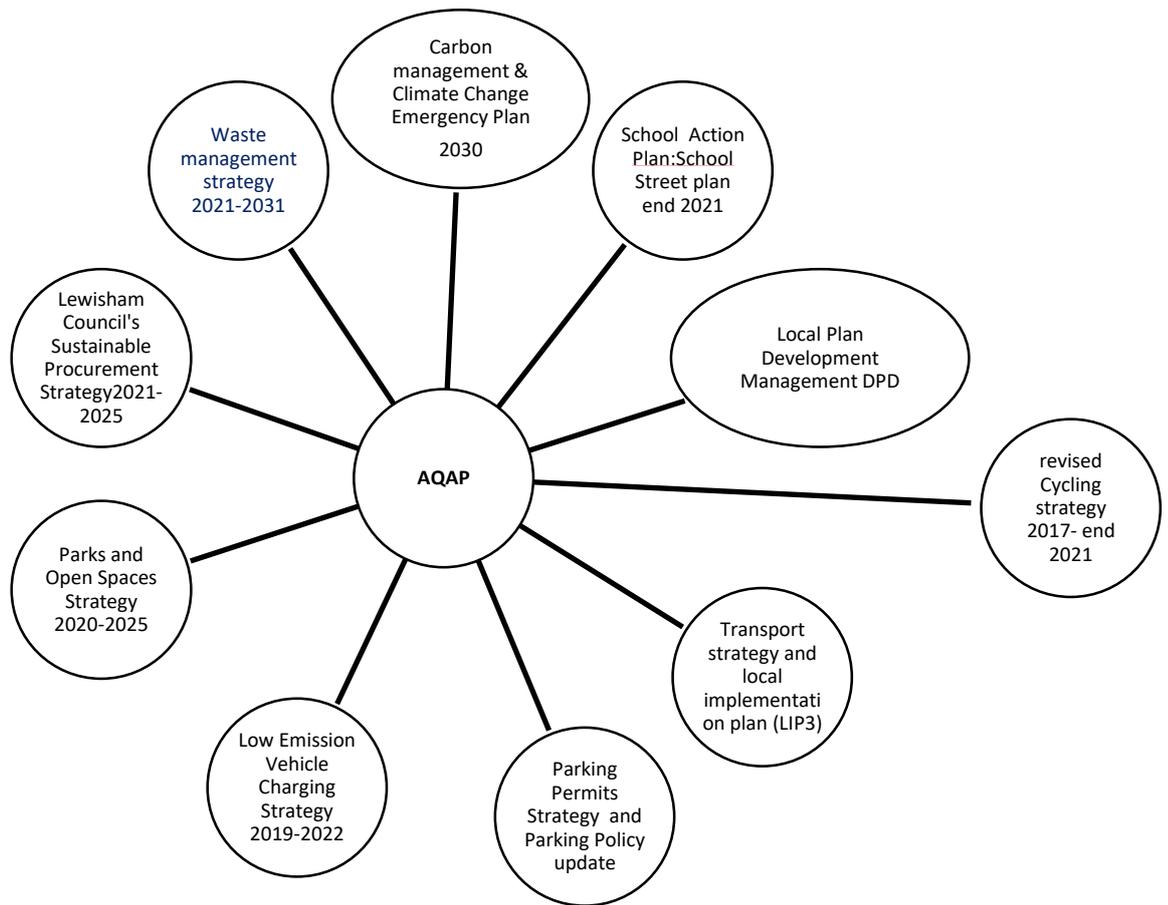


Figure 19 Some local strategies linked to this AQAP

- **Air Pollution and Carbon management/ Strategic heat network**

National measures to cut air pollution would benefit from stronger links with climate action, according to the European Environment Agency (EEA). Promoting consistency in reporting policies and measures on air pollution, energy and climate change can reduce red tape, foster policy coherence and support the identification of synergies across efforts towards zero pollution and climate neutrality nationally and locally. Further information on our point approach is set out above in the summary to this document.

The maps below highlight the potential geographical synergies between the GLA air quality focus areas 126, 127 and 131 with the proposed focal point for heat networks identified in recent Energy Master Planning work by the Council. Progress in decentralising energy systems and converting them to clean zero carbon energy sources would be expected to deliver carbon and air quality benefits.

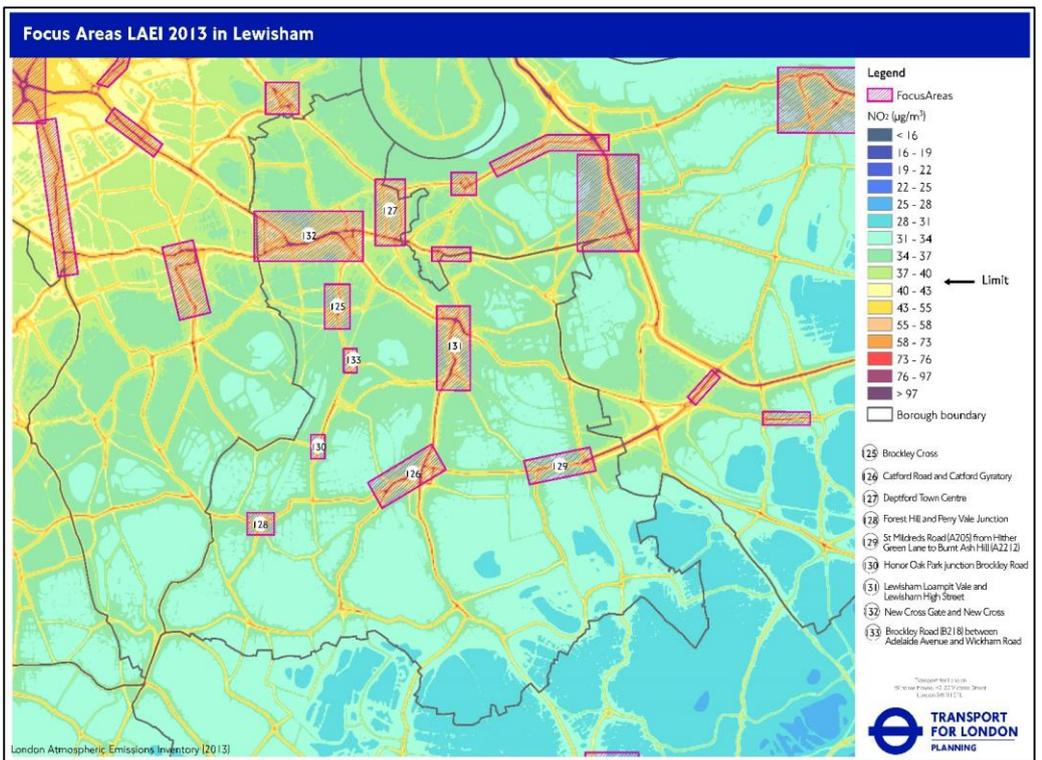
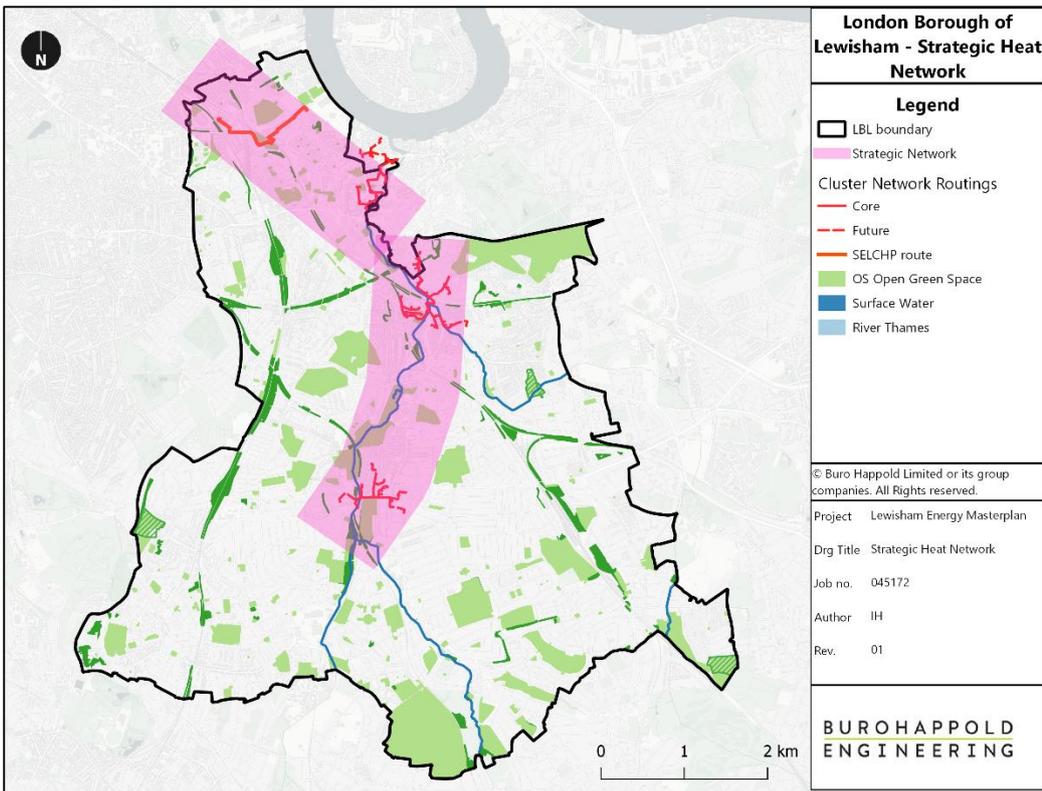
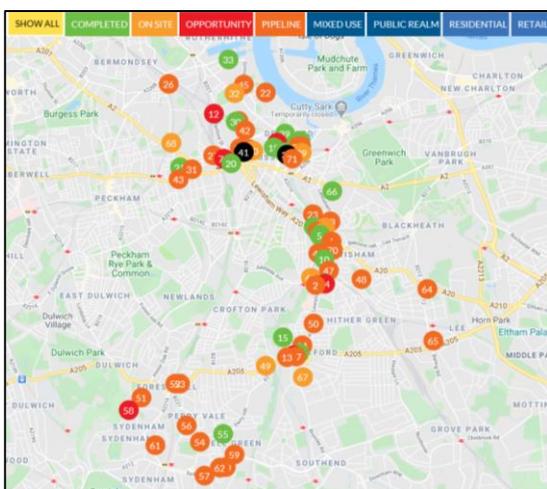


Figure 20 Relationship between air quality focus areas and strategic heat network in Lewisham

- **Air Pollution and Lewisham local development framework**

It is important to include policies relating to the strategic planning framework at every level (Regional Spatial Strategy and Local Development Framework). The presence of a suitable air quality policy can be particularly useful where a refusal of planning permission leads to an appeal and subsequent public inquiry. The Lewisham Development Management Local Plan (DMLP) sets out the Council's planning policies for managing development in LBL and will be used to guide, assess, and determine planning applications. The plan supports the implementation of the Lewisham Core Strategy and the London Plan and should be read alongside the Site Allocations Local Plan, the Lewisham Town Centre Local Plan, and any Council Supplementary Planning Documents (SPDs).

Lewisham will be one of the fastest growing parts of the London economy by 2027⁹⁹. The following extracts from an online Interactive Development Map show that Lewisham, Bakerloo Line, Catford and New Cross Gate / Deptford are area planned for development that need be taken into consideration in the coming years.



N	Description	Site
3	Lewisham Gateway Phase 2	Ongoing
9	Former Carpet right, Loampit Vale	
32	Deptford Timberyard	
40	Amersham Vale	
63	Church Grove	
68	1 White Post Street	
67	Phobes Garden Centre	Opportunity
12	164-196 Trundleys Road	
37	Catford Town Centre	
38	Deptford and New Cross	
58	Mais House	
72	Land at Goodwood Road	
73	Tesco Store, Conington Road	
74	PLACE/Ladywell redevelopment	

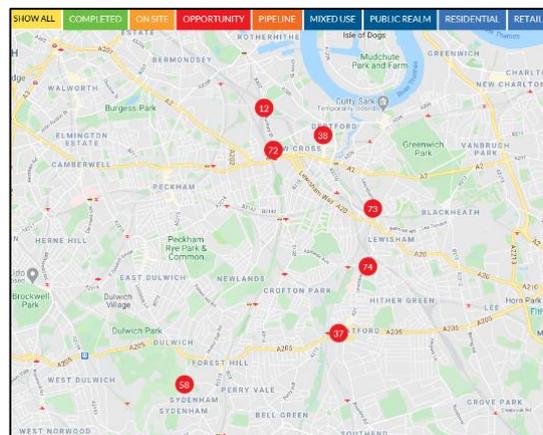
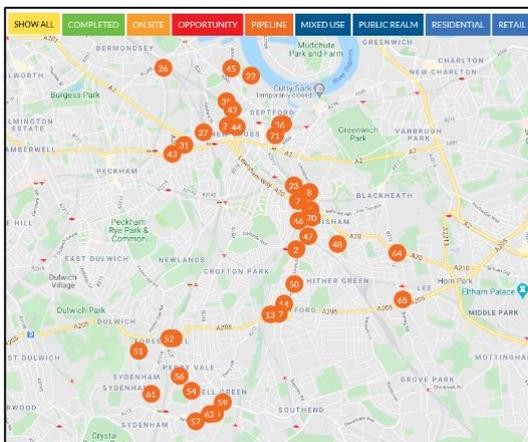


Figure 21 Relationship between air quality policies and Lewisham local development framework

⁹⁹ See more <https://lewishamlondon.co.uk/interactive-development-map/> [Accessed 28/01/2021].

Appendix D Summary of Current National Air Quality Standards/ Objectives and WHO air quality guidelines

The following table represents a summary of WHO air quality guidelines prior to September 2021.

Table D.1 WHO air quality guidelines prior to September 2021

Pollutant	Objective (UK)	Averaging Period	Date ¹⁰⁰
Nitrogen dioxide - NO ₂	200 µg m ⁻³ not to be exceeded more than 18 times a year	1-hour mean	31 Dec 2005
	40 µg m ⁻³	Annual mean	31 Dec 2005
Particles - PM ₁₀	50 µg m ⁻³ not to be exceeded more than 35 times a year	24-hour mean	31 Dec 2004
	40 µg m ⁻³	Annual mean	31 Dec 2004
Particles - PM ₁₀ WHO Air quality guideline values	20 µg m ⁻³ annual mean	Annual mean	2030
	50 µg m ⁻³	24-hour mean	2030
Particles - PM _{2.5}	25 µg m ⁻³	Annual mean	2020
	Target of 15% reduction in concentration at urban background locations	3 year mean	Between 2010 and 2020
Particles - PM _{2.5} WHO Air quality guideline values	10 µg m ⁻³	Annual mean	2030
	25 µg m ⁻³	24-hour mean	2030
Sulphur Dioxide (SO ₂)	266 µg m ⁻³ not to be exceeded more than 35 times a year	15-minute mean	31 Dec 2005
	350 µg m ⁻³ not to be exceeded more than 24 times a year	1 hour mean	31 Dec 2004
	125 µg m ⁻³ not to be exceeded more than 3 times a year	24-hour mean	31 Dec 2004

¹⁰⁰ by which to be achieved by and maintained thereafter

The WHO 2021 air quality guidelines provide interim targets for concentrations for the main pollutant which aimed at promoting a gradual shift from high to lower concentrations¹⁰¹. The reader should refer to the full document for further details.

Table D.2 Current WHO air quality guidelines published in 2021

Pollutant In $\mu\text{g m}^{-3}$	Averaging time for pollutants/Definition	Summary of WHO (2021) recommended Pollutants AQG levels and interim targets (IT) $\mu\text{g m}^{-3}$				AQG level/Target $\mu\text{g m}^{-3}$
		IT1	IT2	IT3	IT4	
PM _{2.5}	Annual	35	25	15	10	5
	24-hour	75	50	37.5	25	15
PM ₁₀	Annual	70	50	30	20	15
	24-hour	150	100	75	50	45
O ₃	Peak season	100	70	na	na	60
	8-hour	160	12	na	na	100
NO ₂	Annual	40	30	20	na	10
	24-hour	120	50	na	na	25
	1-hour	NC	NC	NC	NC	200
SO ₂	24-hour	125	50	na	na	40
	10- minute	NC	NC	NC	NC	500
CO	24-hour	7	na	na	na	4
	8-hour	NC	NC	NC	NC	10
	1-hour	NC	NC	NC	NC	35
	15-minute	NC	NC	NC	NC	100

Note: Extract WHO global air quality guidelines: particulate matter (PM_{2.5} and PM₁₀) , ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide (World Health Organisation, 2021).

¹⁰¹ <https://www.who.int/news/item/22-09-2021-new-who-global-air-quality-guidelines-aim-to-save-millions-of-lives-from-air-pollution>

London Borough of Lewisham

Air Quality Action Plan 2022-2027

Consultation Responses Report

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January 2022

London Borough of Lewisham Air Quality Action Plan 2022-2027 Consultation Results

SUMMARY

A draft Air Quality Action Plan (AQAP) was produced in September 2021 as part of the Council's duty to London Local Air Quality Management. It outlines the actions we will take to improve air quality in the London Borough of Lewisham (LBL) between 2022 and 2027. This draft plan replaces the previous plan which ran from 2016 to 2021, currently available on the Lewisham Council website¹. The draft plan was developed in accordance with the London Local Air Quality Management (LLAQM) Policy Guidance and Technical Guidance². As well as setting out plans for the next five years, it also provides an opportunity to reflect on the effectiveness of measures introduced by the 2016 to 2021 AQAP. A copy of the draft plan is available on our website³.

Comments made by each Council service and the Greater London Authority (GLA) were used to shape the draft plan prior to consulting the main groups as required by the legislation. A consultation exercise was warranted in accordance with the Environment Act 1995 and the LLAQM framework. Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation.

A public consultation was carried out between Wednesday 1 September 2021 and Wednesday, 6 October 2021, using a communication plan produced prior to the external consultation, which has been appended to this report.

Who we heard from

Three main stakeholder groups were consulted during the development/ review of the Air Quality Action Plan.

These comprise of: -

- Internal stakeholders who will deliver the actions detailed in the plan Statutory consultees as required by the legislation
- The external stakeholders due to significant public interest in health issues and local air quality.

¹ <https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality-action-plan-and-other-reports>

² <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

³ <https://lewisham.gov.uk/myservices/environment/air-pollution/consultation-on-our-draft-air-quality-action-plan-2022-2027>

a) **Internal Stakeholders:** The consultation of each relevant service area was carried out before and during the development of the plan. This included the following service areas:

- Environmental Health
- Environmental Protection
- Crime Enforcement Regulation (CER)
- Fleet (S.G.M Environment)
- Housing Private Sector (Environmental Health Residential) and Private Sector Housing (Grants)
- Parking and IT
- Planning and Development Management
- Parks & Regeneration
- Strategic Procurement and Commercial Services
- Public Health
- Sustainable Resources/Climate Resilience
- Transport (including Smarter travel, Parking Services Finance, Sustainable Transport – Operations, Sustainable Transport - Major Schemes Projects & Transport Planning)
- Others (including Corporate Resources, Strategy & Communications and Enforcement Response)

All staff working for the Council were further consulted during the public consultation.

b) **Statutory consultees as required by legislation:** It is a legal duty under the Environment Act 1995 and the LLAQM Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following parties were contacted directly by email as planned.

- The Secretary of State, Residents, Local MPs and Council Members
- The Environment Agency (EA), Transport for London(TfL)
- All neighbouring local authorities, the South London Cluster Group
- Bodies representing local business interests and other organisations such as South London Chamber of Commerce and Enterprise
- The Greater London Authority (GLA) is being consulted during the review and consultation stages. Following the consultation exercise, the final plan was agreed with the GLA and the cabinet.

What we heard

A combination of interlinked and complementary measures are key to creating positive short term and long term impacts on air quality and carbon reduction in Lewisham.

Using the following list of topics proposed by the GLA in its template matrix to reduce air pollution in London, the findings of the survey were as follows:

- **Monitoring and other core statutory duties:** Several respondents reiterated the need for the Council to increase air quality monitors around sensitive receptors including schools, nurseries, care homes, hospitals, around major roads and in areas

with high levels of deprivation and for the council to adopt the new WHO guidelines⁴ published in September 2021. Increased public information about the human health risks from air pollution was also mentioned in several responses.

- **Emissions from developments and buildings:** It was suggested that the Council uses planning tools to encourage sustainable development and impose air quality mitigations measures for all developments (e.g. reduce indoor pollution by adopting and providing incentives to replace combustion plants like old boilers to low emission alternatives; reducing emission from construction activities, non-road mobile machinery(NRMM), reducing indoor pollution, installing more electric charging points and green infrastructure in new developments) and air source heat pump installation in housing estates.
- **Delivery servicing and freight:** There was feedback that the Council should work with partners to reduce emissions from vehicles delivering goods and services, including light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions.
- **Borough fleet actions:** The Council should lead by example by tackling its own fleet (i.e. replacing with low emission alternatives), and taking all the necessary actions to reduce other sources of air emissions and its carbon footprint.
- **Localised solutions:** There were several responses about the Low Traffic Neighbourhood (LTN). It was suggested that Lewisham Council should work with all relevant authorities to resolve traffic issues on major strategic roads such as the south circular which will lead to reducing congestion, vehicle idling and air pollution. A couple of respondents suggested that the expansion of the LTN would be positive because it would help to improve air quality and enable the Council to commit to radical actions which actively discourage car ownership. The changes suggested include fewer parking spaces, more LTN's, more enforcement actions and expanding ULEZ to the entire Borough.
- **Cleaner transport:** Road transport is the main source of air pollution in London, therefore, this was the topic that generated the most feedback during the consultation. Suggestions include increasing and promoting active travel, reducing and discouraging car usage, increasing road safety and increasing walking and cycling infrastructure, promotion of low emission vehicles, combusting plant and infrastructure. Our school street programme was appreciated and further pedestrianisation was suggested to encourage active travel. Again, addressing the traffic impacts of the LTN and traffic on the south circular were the predominant suggestions. There were some negative comments about the ULEZ expansion, and some positive comments stating that the scheme should be enforced to ensure that no non- ULEZ compliant buses or taxis drive in the Borough.
- **Other important feedback from the consultation include:**
 - Replace old boilers(s) with ultra-low emission boilers and use of bicycles for local journeys or taking the bus regularly scored the highest on the lifestyle or behaviour changes that the residents would like to adopt to reduce air pollution. (Most respondents stated that they were already taking most of the actions listed in the survey).

⁴ <https://www.who.int/news/item/22-09-2021-new-who-global-air-quality-guidelines-aim-to-save-millions-of-lives-from-air-pollution>

- Carry out energy audits, designing in-house travel plans for staff in addition to encouraging staff to use public transport where possible, were the highest ranking lifestyle or behaviour changes that businesses and other organisations would like to adopt to improve air quality.
 - Increase green infrastructure and stop the removal of green infrastructure around sensitive receptors and major roads.
 - Reduce pollution in and around schools by extending school audits to other schools in polluted areas, and improving walking and cycling infrastructure were some of the highest ranking suggestions included on the Council's priority list of actions.
 - Improve Lewisham's waste management procedures, street cleansing and other services.
- **Demographics of the survey:**
 - **Age:** The majority (17.43%) of respondents were between 45-49 years of age. People aged 18-24 and 75-79 represented the age groups with the lowest (8.3% for each) proportion of responses. 6.22% of respondents provided no answer to the age question and 5.39% did not to state their age. The residual percentage was distributed among other categories.
 - **Ethnicity:** 7.14%% provided no answer and 7.14% preferred not to state their ethnicity. Of those that did, the majority of respondents (71 %) were white with the rest distributed across other ethnic groups.
 - **Gender:** There were slightly more male (44.96%) than female (43.70%) respondents. Some did not answer or preferred not to state their gender;
 - **Disability:** 7.14% were disabled (disabilities distributed across all categories), 9.24% provided no answer, 6.30% preferred not to say, the majority of respondents did not identify as disabled. Easy read, step-free access, accessible toilets, wheelchair access were among suggestions given to improve accessibility of the consultation.
 - **Religion:** The majority (48.55%) did not state a religious preference, 9.54% preferred not to say anything about their religion and 17.43% provided no answer. Of those that did respond 19.09% were Christians, the remainder were distributed among other religions.
 - **Sexuality:** The majority (62.24%) of respondents identified as heterosexual, the remainder of respondents was distributed among other categories. 11.62% preferred not to say their sexuality and 16.60% who provided no answer.
 - **Gender Identity:** The majority (67.22%) of respondents identified with the same gender as the one that they had at birth. The remainder were distributed among other categories with 10.79% preferring not to say their gender at birth, 21.16% provided no answer. 0.83% had different a gender identity from the one that they had at birth.
 - **Areas:** The majority of respondents (14.11%) live in Lee Green, and 12.45% live in Lewisham Central. The remainder were distributed among other locations with 2.49% not living in Lewisham. 12.45% provided no answer.

Conclusions: The age distribution of the respondents corroborate with the most active group of the population or those most able to use the internet to

respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with other groups of the population. The results may also be attributed cultural differences or social and economic inequalities, with the people from Black and Minority Ethnic (BME) backgrounds (which are more impacted by air quality in accordance with recent research), more likely to be interested in meeting their financial and socio-cultural needs than taking part in surveys with others potentially not having English as a first language. The findings related to disability raised the issue of resources needed to better meet the needs of this group. Most respondents were from the Lee Green and Lewisham Central areas, which is representative of the populations most affected by the LTN. The general negative perception of the LTN by this group may have impacted the results of the survey.

What we have done with your suggestions

We have considered all the comments made and modified the plan as appropriate.

Following approval by the relevant parties, the adopted AQAP will be subject to annual review, appraisal of progress and reporting to Lewisham Health Protection Committee and Lewisham Strategic Air Quality Board.

Progress each year will be reported in the Annual Status Reports, as part of our statutory London Local Air Quality Management duties.

CONTENTS

1	Development and Consultation on the draft 2022-2021 AQAP	9
2	Detailed Results –Statutory Consultees	11
3	Detailed Results - The Survey Questions	12
4	Conclusion and next stage.....	36
Appendix A	Air Quality Action Plan Communication Plan and questionnaire	a
Appendix B	Summary of Detailed responses /Suggested actions (SEE EXCEL SHEET)	a

List of Tables

Table 1.	Q1. Are you completing this questionnaire as?	12
Table 2.	Q2. Please indicate which of these you think should be the highest priority for Lewisham Council? Seven is 'lowest priority' and one is 'highest priority'?	13
Table 3	Q3. Having read the Lewisham Air Quality Action Plan 2022–27, how effective do you think our proposals are in dealing with the following?	14
Table 4	Q4. Please tell us if you think there is anything we have missed or should consider in relation to the above Air Quality issues.....	14
Table 5	Q5. Do you understand the personal contribution you can make to tackling poor air quality?	17
Table 6	Q6. What lifestyle or behaviour changes would you be willing to make to improve poor air quality?.....	20
Table 7	Q7. What lifestyle or behaviour changes would you or your organisation be willing to make to improve poor air quality? If your response is on behalf of a business/organisation/ institution/community group	21
Table 8	Q8. What can Lewisham Council do to help you make these changes?.....	23
Table 9.	Q9 what is your name and address? (This question is optional and will not be disclosed). Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection Regulations (GDPR).	28
Table 10	Q10. What is your email address? (This question is optional and will not be disclosed).	28
Table 11	Q11. Why are we asking you for this information?.....	29
Table 12	Q12. What is your age?	29
Table 13	Q13. What is your sex?	30
Table 14	Q14. What is your ethnicity?	31
Table 15	Q15. Disability.....	32
Table 16	Q16. What Ward do you live in??	33
Table 17	Q17. What is your religious belief?.....	34
Table 18	Q18. How would you define your sexual orientation?	34
Table 19	Q19. How would you define your Gender Identity?	35
Table 20.	Suggested modifications in AQAP Table 4.1 Action taken.....	1

Introduction

Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between Wednesday 1 September to Wednesday 6 October 2021.

In addition to the five statutory consultation responses received via the Environmental Protection (EP) email inbox, we received 241 responses with 238 via the online survey and 3 paper surveys completed, then submitted to the library. Two responses on the AQAP were made after the deadline of the consultation has passed, via the EP inbox and the views expressed were also considered.

There were a variety of respondents, from residents, political representatives, business owners, regular visitors to workers in Lewisham. We were particularly pleased to hear from the 206 residents who provided some feedback on our proposed actions to tackle air pollution between 2022 to 2027.

The consultation asked for views about the measures proposed in our draft AQAP. This report is a summary of the consultation survey results and the main themes identified from written feedback.

Overall, there has been a neutral to positive response to most of the interventions suggested. The consultation results show that some interventions, such as our proposed air quality monitoring regime, were highly acceptable while some, such as the proposed transport, highway and parking interventions and policies, need more work pending the availability of the right level of resources. The general public impression about the LTN and traffic issues on localised areas such as the south circular was the most commented on topic. Suggestions and general comments about traffic interventions included promoting alternatives to private vehicle use, freight and delivery management e.g. delivery and service plans, promoting low emission transport, promoting travel alternatives, public information, traffic management (anti-idling enforcement, strategic highway improvements, re-prioritising road space away from cars, including access management, selective vehicle priority, bus priority, high vehicle occupancy lane, increasing parking enforcement), transport planning and infrastructure (promoting low emission public transport, vehicle retrofitting programmes, active travel and walking and cycling infrastructures).

Only minor to medium modifications have been carried out within the draft AQAP plan that LBL consulted on because most proposals made by the consultees were already considered in the plan or considered within other strategies (e.g. the transport strategy, draft Local plan, the waste management strategy and the climate emergency plan) as detailed in Appendix B of the AQAP available on our website or currently being compiled.

We have considered all suggestions and provided responses. Feedback from the consultation has been reviewed and used to update the action plan which will be put to the Mayor of London for approval by end of March 2022. We will seek Mayor and Cabinet approval of the final plan by end March 2022. This delay is due to limited staff resources because of the impact of COVID-19 and its impact on our finances.

The final action plan considers measures and actions in terms of costs, effectiveness, time-scales and feasibility of implementation. We still cannot guarantee that we will be able to do everything that you want us to do immediately. However, we will work hard with our partners to achieve our duty, aim and objectives to reduce human health exposure to air pollution across the borough.

1 Development and Consultation on the draft 2022-2021 AQAP

Effective communication, engagement, and consultation was considered of paramount importance to ensure that this AQAP fulfils its goal to produce quantifiable outcomes for all stakeholders and delivery partners within the borough who have an influence on air quality.

In developing/updating the action plan we worked with other local authorities, various agencies, businesses, and the local community to try and deliver a tangible improvement to local air quality.

We seek to develop a plan that will enable us to communicate, engage, and consult with the public and any interested party during the development and implementation of this AQAP. We will involve local communities, volunteers, businesses, schools, institutions, and organisations to raise the awareness of air quality issues in the borough and support the plan through campaigns, events, and training.

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

The purpose of the group 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 and alignment 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 Group will meet on a regular basis to provide input and feedback and ensure communication channels are maintained.

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

Subsequent to the meeting and engagement with different parties, a draft AQAP plan was produced in September 2021 and Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.1 of the AQAP and the general public on the measures proposed.

We undertook the following stakeholder engagement:

- Publicity on website and social media;
- Articles in local newspaper;
- Online questionnaire to local residents and businesses to seek opinions on actions;
- Healthy Lungs tent/poster campaign where possible, raising issues and highlighting the council's actions.

The statutory consultation undertaken included the Environment Agency (EA), Transport for London (TfL), the Mayor of London, all neighbouring local authorities, other relevant public authorities and bodies representing local business interests and other relevant organisations.

A copy of the communication plan and the survey questionnaire used are appended (Appendix A) to this document.

This report detailing the response to our consultation stakeholder engagement is appended to the actual AQAP (Appendix B) with the response to the survey presented in the following sections.

2 Detailed Results –Statutory Consultees

Statutory consultation was undertaken via email and the detailed results and responses have been included and appended to this document. Five responses were received via email correspondence within the consultation timeframe. Two comments were made post consultation and the view expressed were also considered.

A summary of the responses to consultation and stakeholder engagement on the AQAP is presented in the following section. Reference should be made to Table 20 and Appendix B for detailed responses from the secretary of State, the Environment Agency and other bodies and from the residents.

MPs and Members were part of the development of the AQAP and were consulted again during the process.

Transport for London (TfL) provided no response to the consultation.

The Greater London Authority (GLA) was consulted during the review and consultation stages. Following the consultation exercise, the final draft plan was agreed with the GLA and the resulting Consultation Report appended to this report.

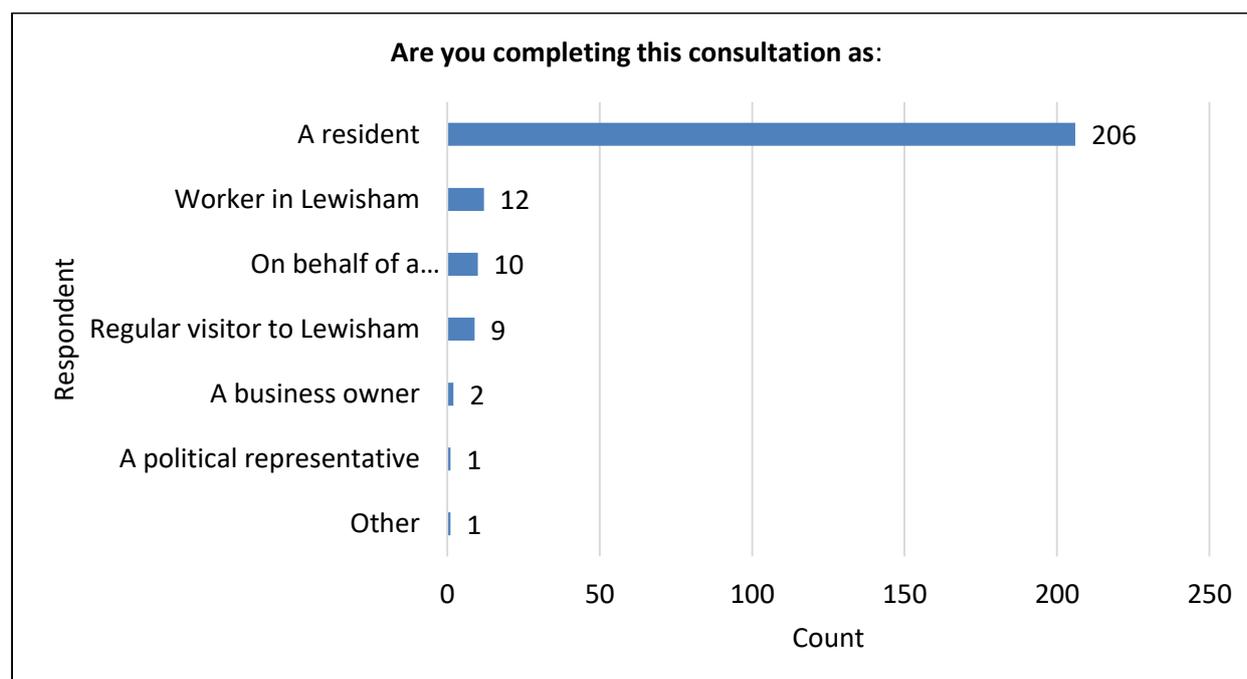
As assessment of the results revealed, issues raised are mostly related to transport planning, sustainable transport and highways interventions, as anticipated.

3 Detailed Results - The Survey Questions

All quantitative analysis of the responses were carried out in Excel. R/R Studio software⁵ was used to estimate the highest word counts for the qualitative responses and the relevant outputs are presented in the relevant sections. R is a free, open source software programme for statistical analysis.

Table 1. Q1. Are you completing this questionnaire as?

Representative	Count of Response ID	Percentage
Other	1	0.41%
A political representative	1	0.41%
A business owner	2	0.83%
Regular visitor to Lewisham	9	3.73%
On behalf of a business/organisation/institution/community group/authority	10	4.15%
Worker in Lewisham	12	4.98%
A resident	206	85.48%
Total	241	100.00%



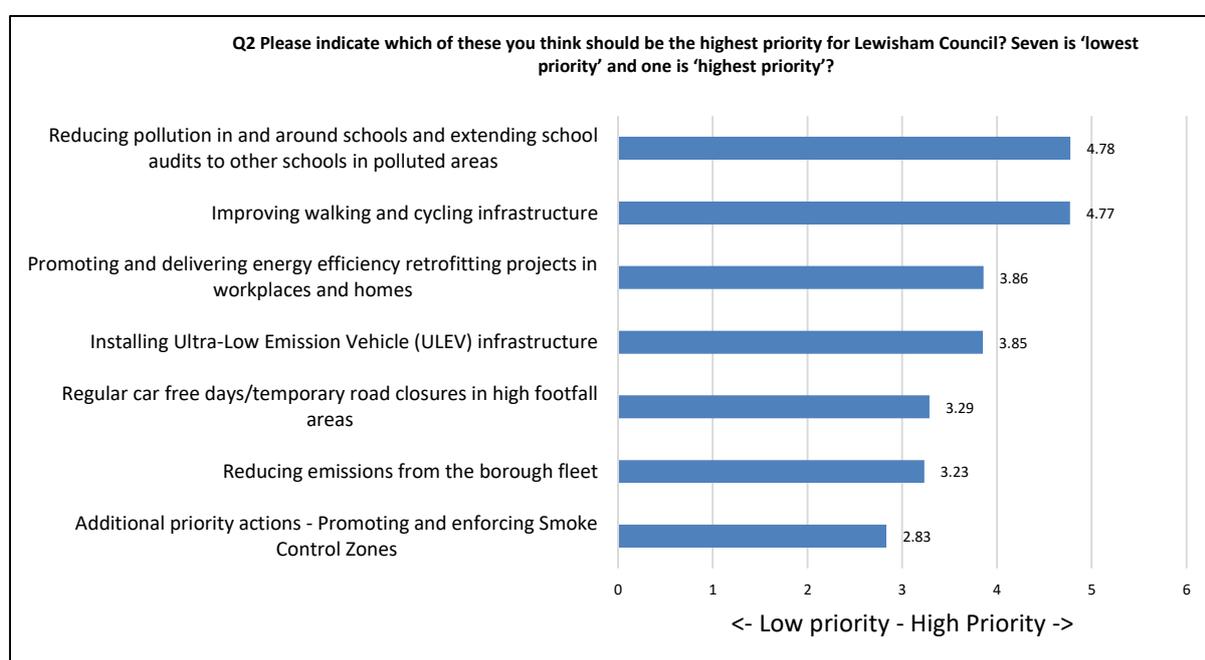
Note on Q1: As anticipated, most respondents were residents, who represent the highest group of the population sampled. According to the 2011 census, Lewisham has a population of 275,885. The low response rate from political representatives was anticipated because their opinions are voiced via their respective political parties and are unlikely to provide individual views.

Action in the AQAP: Consideration will be given to improving promotion and engagement activities and increase projects involving businesses, organisations, institutions and community groups to raise awareness about air quality.

⁵ <https://libguides.library.kent.edu/statconsulting/r>

Table 2. Q2. Please indicate which of these you think should be the highest priority for Lewisham Council? Seven is 'lowest priority' and one is 'highest priority'?

Action	Rank
Reducing pollution in and around schools and extending school audits to other schools in polluted areas	1
Improving walking and cycling infrastructure	2
Promoting and delivering energy efficiency retrofitting projects in workplaces and homes	3
Installing Ultra-Low Emission Vehicle (ULEV) infrastructure	4
Regular car free days/temporary road closures in high footfall areas	5
Reducing emissions from the borough fleet	6
Additional priority actions - Promoting and enforcing Smoke Control Zones	7

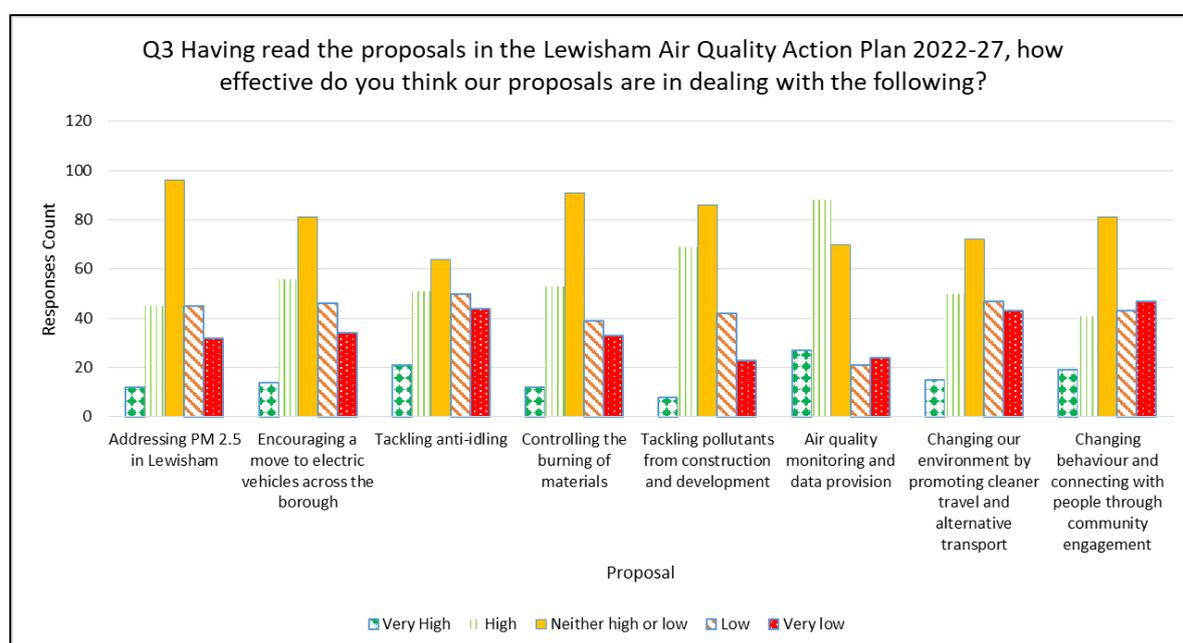


Note on Q2: Reducing pollution in and around schools, and extending school audits to other schools in polluted areas then improving walking and cycling infrastructure scored the highest as represented above.

Action in the AQAP: As stated in Pages 12-13 of the Draft AQAP, air pollution particularly affects some of the most vulnerable in society: children and older people, and those with heart and lung conditions. LBL, along with other London boroughs, will work to set out how the objective in Table 4.1 of the AQAP can be implemented and provide details setting out how the most vulnerable people will be protected. Therefore, reducing pollution in and around schools and extending school audits to other schools in polluted areas and improving walking and cycling infrastructure scored the highest will be added to our priority list. We are prioritising and completing the school air quality plan for imminent action. The implementation of further air quality monitors, school streets, school audits and green infrastructures are imminent.

Table 3 Q3. Having read the Lewisham Air Quality Action Plan 2022–27, how effective do you think our proposals are in dealing with the following?

Action	Priority
Air quality monitoring and data provision	1
Tackling pollutants from construction and development	2
Encouraging a move to electric vehicles across the borough	3
Controlling the burning of materials	4
Addressing PM 2.5 in Lewisham	5
Tackling anti-idling	6
Changing behaviour and connecting with people through community engagement	7
Changing our environment by promoting cleaner travel and alternative transport	8



Note on Q3: Only “air quality monitoring and data provision” scored “High”. The rest of suggested actions were neither high nor low. Three main categories of meaning may be attributed to these middle point answers as follows. The first category refers to those cases in which the respondents account for their choice in terms of (some sort of) lack of knowledge or indifference about the council’s proposals to deal with air quality. The second category includes those answers that justify mid-point choice through ambivalence or indecisiveness on the proposed actions, while the third comprises answers that argue against the main assumptions made by the council and/or formulation of the questions posed. A critical analysis of the middle answer category is outside the scope of this assessment and not imperative to meet the objective of the consultation exercise. The inconclusive nature of the answers to most of the questions does not mean that the measures proposed are unacceptable to the general public.

Action in the AQAP: No actions needed. The findings would suggest that overall, the measure presented in the 2022-2027 AQAP would be acceptable pending further minor modifications to accommodate the comments made by the respondents.

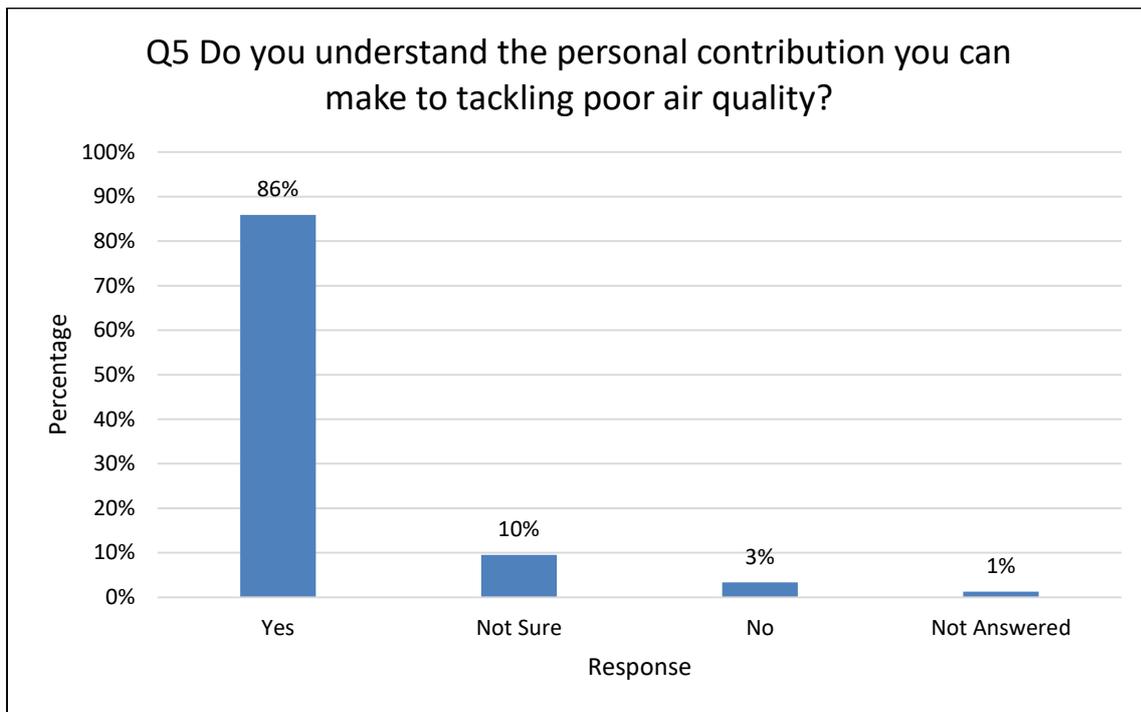
Table 4 Q4. Please tell us if you think there is anything we have missed or should consider in relation to the above Air Quality issues

N	GLA recommended categories	Examples of Suggested omissions
1	Monitoring and other core statutory duties: maintaining monitoring networks is absolutely critical for understanding where pollution is most acute, and what measures are effective to reduce pollution and is one of a number of statutory duties	<ul style="list-style-type: none"> • Most comments related to the fact that the current monitoring regime could be improved. However, all the suggestions made were already considered by the council for implementation. • It is proposed that consideration be given to installing monitors around sensitive receptors, areas of deprivation and on our major roads where pollution is the highest. • Collaboration with other organisations like citizen science was considered of paramount important to the implementation of this plan. • Adoption of the new WHO guidance published in September 2021. • Annual report on progress- overview by independent assessors to ensure rigorous application
2	Emissions from developments and buildings: emissions from buildings account for about 15% of the NO _x emissions across London so are important in affecting NO ₂ concentrations.	<ul style="list-style-type: none"> • Most suggestions were related to development planning and requirement of air quality management and mitigation measures for all types of developments. E.g. NRMM and combustion plant like heat pumps. • It was suggested that the council should promote sustainable development to reduce air emissions.
3	Public health and awareness raising increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution	<ul style="list-style-type: none"> • Increase green infrastructure around schools • Add air quality monitoring around health care settings such as hospitals/ hospice/ homeless hostels/ care homes etc. • Improve insulation of residential properties reduces the amount of fuel for heating in winter and cooling in summer. • Produce a more detailed Strategy for mitigation for schools on main roads unable to join school streets programme (money for air filters/green screens)
4	Delivery servicing and freight: vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO ₂ emissions	<ul style="list-style-type: none"> • Address excessive amounts of HGV lorries and other vehicles from out of borough, Kent and the A20 driven through the borough (Brownhill Road & South-circular) on a daily basis, promote the use of cargo bikes, which are a solution to 'last mile' deliveries. Use of these delivery vehicles benefits from improved cycling infrastructure.
5	Borough fleet actions: our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO ₂ emissions. Tackling our own fleet means we will be leading by example.	<ul style="list-style-type: none"> • Upgrade its entire fleet of borough vehicles to electric only (this would have to go hand in hand with better EV charging infrastructure) and heat pumps the standard for council estate.
7	Localised solutions: these seek to improve the environment of neighbourhoods through a	<ul style="list-style-type: none"> • Planting street trees to mitigate pollution, slow traffic, reduce urban heat islands (and use of aircon), and reduce localised flooding, foster wellbeing, encourage community engagement, encourage walking,

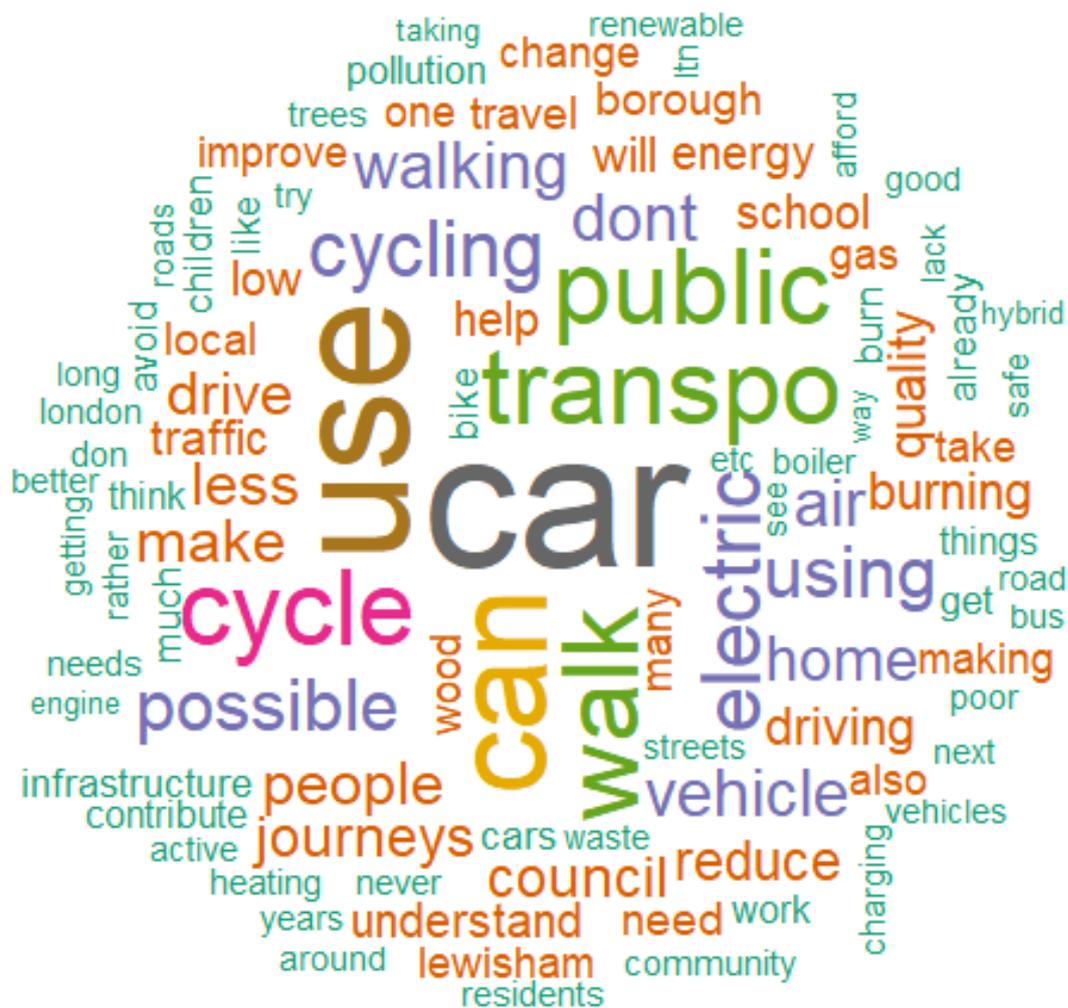
	combination of measures; and	<p>encourage biodiversity, and bring many more benefits.</p> <ul style="list-style-type: none"> Needs to be much clearer about how to tackle specific localised air pollution such as on the South Circular.
7	Cleaner transport: road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric) as far as possible	<ul style="list-style-type: none"> Some of the suggestions include, improving sustainable travel, promoting cycle storage in new developments, reducing car usage and ownership and improving road safety, improving cycling and walking infrastructures, halting the Low Traffic Neighbourhoods or redesign, take measure to discourage driving into the borough e.g. more Controlled Parking Zones and traffic enforcement actions, road closure around Schools roads, idling enforcement and banning diesel from Lewisham roads, like Deptford Church Street for example.
2.	Other	<ul style="list-style-type: none"> Promote schemes to replace boilers and insulating homes and ensuring that new developments are well insulated with sustainable energy More bicycle infrastructure Improve our waste managing and street cleansing procedures The Council has a statutory responsibility to collect waste and recycling from these same streets. I would ask that appropriate exemptions are considered and granted to services fulfilling statutory duties before any traffic restriction measures are put in place. The operational and cost implications of transport and traffic restrictions on frontline Council services need to be considered, and in some circumstances funded, before there are agreed and implemented Take more action on all - particularly burning materials and pollutants
	Green infrastructure	<p>Some of the suggestions include:</p> <ul style="list-style-type: none"> Increasing tree canopy coverage with more street trees across the borough. Other London boroughs are pushing ahead with ambitious tree planting initiatives whilst Lewisham continues to cut down mature trees which could be incorporated into development e.g. Arklow Road council housing site. Increase green space and trees in mitigating poor air quality.

Note on Q4: Table 20 presents a summary of major responses and actions taken in the draft AQAP. Responses to each response to the consultation have been appended to this report (Appendix B)

There were 141 responses to this part of the question. Responses to this question were generally in line with the overall demographics of the survey in terms of ethnicity, age, disability, religion and sexuality. Respondents were also generally aligned with the overall ward breakdown of the survey. Over 50% of issues and suggestions made were about traffic



Note on Q5: There were 147 responses to this part of the question. Over 86% understand the personal contribution they can make to tackling poor air quality, which is representative of the general UK public awareness on air quality and climate change issues. The word cloud analysis carried out using R/R Studio software for Q5 corroborates with the findings from Q4 as follows.



Respondents to this questions were generally in line with the overall demographics of the survey in terms of ethnicity, age, disability, religion and sexuality. Respondents were also generally aligned with the overall ward breakdown of the survey.

The biggest theme throughout the feedback was around car use. Respondents were very aware of the need to reduce car use and of the benefits in using public transport, as well as active travel, such as walking and cycling. The biggest concern was around the infrastructure which supports these activities. Road safety was also mentioned, including air quality when cycling on busy streets. Safety around school streets was also a concern. Many respondents also commented on the use of electric cars, but there was a general concern about access to charging points. There were also mixed views around LTN, with some criticising them for causing more congestion, while others arguing that their expansion would help to improve air quality.

Many respondents were also aware of the importance of not having an open fire or using wood fuel fires in order to improve air quality. A number of respondents also mentioned building heating improvements, such as an electric heat pump. There was also a general awareness of popular campaigns around air quality and carbon reduction, such as not idling cars, being energy efficient and planting greenery.

Overall, responses to the question generally tended to mix air quality and climate change mitigation measures together. Respondents were aware of the most immediate and popular campaigns around air quality such as cleaner transport and building heating improvements, but felt like there were often factors limiting their ability to do these things, such as the available infrastructure and costs. There was therefore a strong emphasis on localised solutions to air quality through improving public infrastructures such as cycle paths, electric vehicle charging points, road safety and accessibility to public transportation networks. There was not a great emphasis on what the council could do to help people to understand what they can do to contribute, however the general themes of the answers show that respondents were aware of air quality and climate change mitigation strategies when they have received effective public messaging campaigns. This would suggest that the other key initiatives in the Air Quality Action Plan would benefit from public awareness campaigns.

I receive emails from you but they are easy to skim over or ignore. I think something visual in the community which connects these issues to the places I walk around each day would help me to think about the issues and to understand what I can do to help e.g. information boards, pieces of art/commissioning artists to work with messaging this to the community.

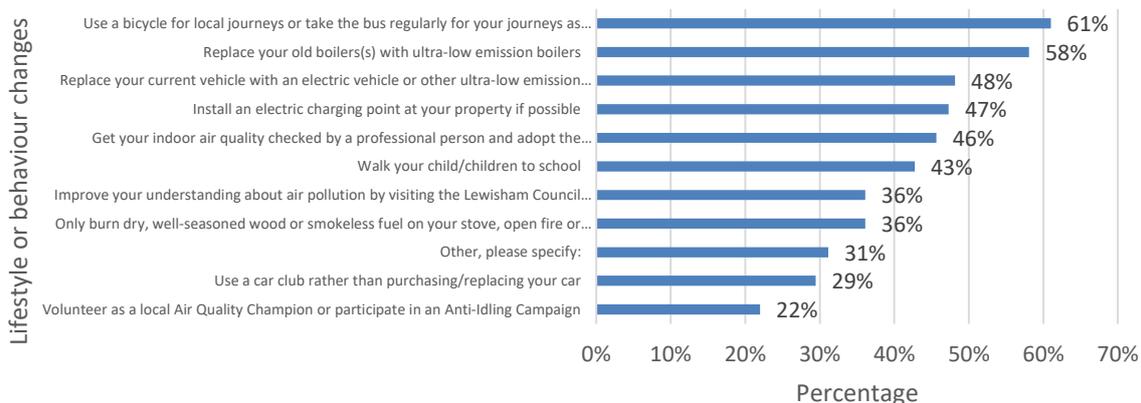
New Cross resident

Action in the plan: More promotion activities to increase awareness among the 14 % the population left is imperative. As noted in Q1 we will carry out significant promotion during the implementation of the AQAP to reach all the layers of the population.

Table 6 Q6. What lifestyle or behaviour changes would you be willing to make to improve poor air quality?

What lifestyle or behaviour changes would you or your organisation be willing to make to improve poor air quality?	Count of Response ID	Percentage
Volunteer as a local Air Quality Champion or participate in an Anti-Idling Campaign	53	22%
Use a car club rather than purchasing/replacing your car	71	29%
Other, please specify:	75	31%
Only burn dry, well-seasoned wood or smokeless fuel on your stove, open fire or barbeque	87	36%
Improve your understanding about air pollution by visiting the Lewisham Council or other relevant websites regularly	87	36%
Walk your child/children to school	103	43%
Get your indoor air quality checked by a professional person and adopt the recommendations to reduce indoor pollution	110	46%
Install an electric charging point at your property if possible	114	47%
Replace your current vehicle with an electric vehicle or other ultra-low emission alternatives	116	48%
Replace your old boilers(s) with ultra-low emission boilers	140	58%
Use a bicycle for local journeys or take the bus regularly for your journeys as much as possible	147	61%

What lifestyle or behaviour changes would you or your organisation be willing to make to improve poor air quality?



Note for Q6: (1) Replace your old boiler(s) with ultra-low emission boilers and (2) use a bicycle for local journeys or take the bus regularly for your journeys as much as possible scored the highest. Use a car club rather than purchasing/replacing your car was the lowest. Replace your current vehicle with an electric vehicle or other ultra-low emission alternatives and install an electric charging point at your property if possible were next in the list.

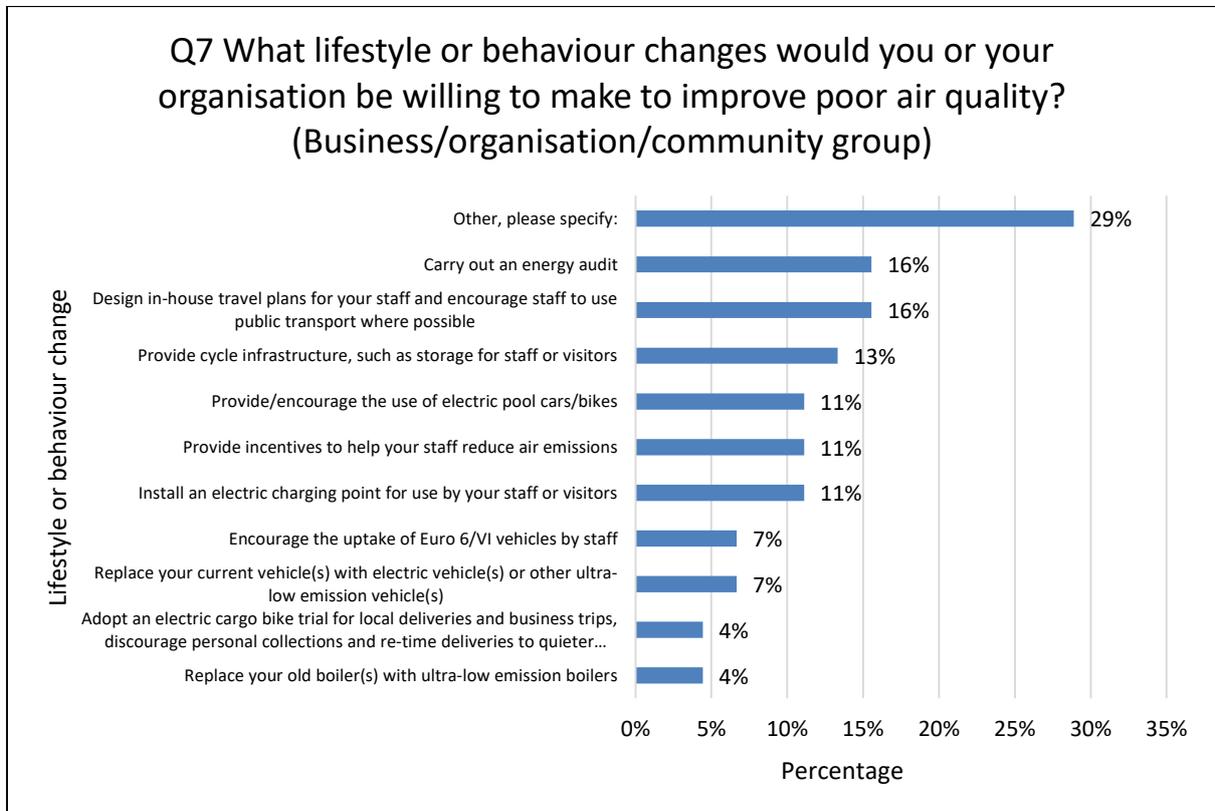
Action in the plan: Projects involving replacing old boilers and to promote active travel are being progressed as part of the transport strategy and the climate emergency plan. Lewisham's Climate Emergency Action Plan was approved by the Mayor and Cabinet in 2020 and includes a range of radical actions across the Council's corporate estate, housing, transport and green spaces intended to support delivery of the ambition for Lewisham to be carbon neutral by 2030. Tackling emission from combustion activities is part of this plan.

We aim to promote cleaner vehicle, active travel and improve relevant infrastructure as detailed in Table 4.1 of the AQAP.

Table 7 Q7. What lifestyle or behaviour changes would you or your organisation be willing to make to improve poor air quality? If your response is on behalf of a business/organisation/institution/community group

What lifestyle or behaviour changes	Count of Response ID	Percentage
Replace your old boiler(s) with ultra-low emission boilers	2	4%
Adopt an electric cargo bike trial for local deliveries and business trips, discourage personal collections and re-time deliveries to quieter periods	2	4%
Replace your current vehicle(s) with electric vehicle(s) or other ultra-low emission vehicle(s)	3	7%
Encourage the uptake of Euro 6/VI vehicles by staff	3	7%
Install an electric charging point for use by your staff or visitors	5	11%
Provide incentives to help your staff reduce air emissions	5	11%
Provide/encourage the use of electric pool cars/bikes	5	11%
Provide cycle infrastructure, such as storage for staff or visitors	6	13%

Design in-house travel plans for your staff and encourage staff to use public transport where possible	7	16%
Carry out an energy audit	7	16%
Other, please specify:	13	29%
Total	45	



Note on Q7: There were 13 online responses to this part of the question. Carry out an energy audit and designing in-house travel plans for your staff and encourage staff to use public transport where possible, were the highest. Only 7 representatives responded to this question. Most respondents are already doing the measures suggested.

Action in the plan: As noted in Q1 we will design projects to meet all groups including businesses and organisations.

Table 8 Q8. What can Lewisham Council do to help you make these changes?

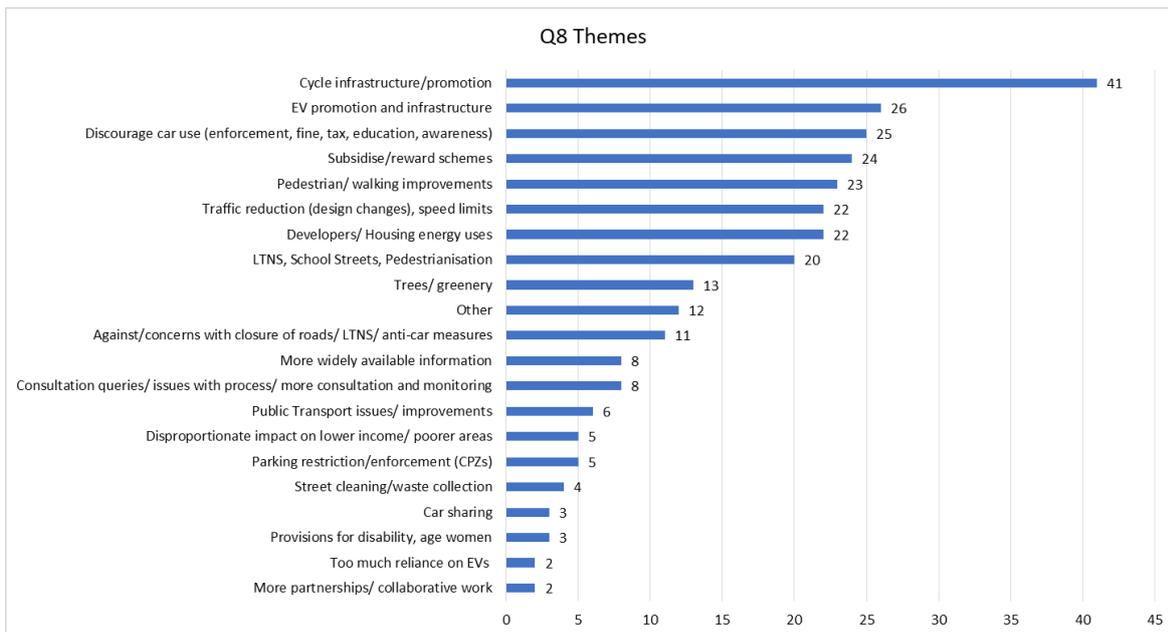
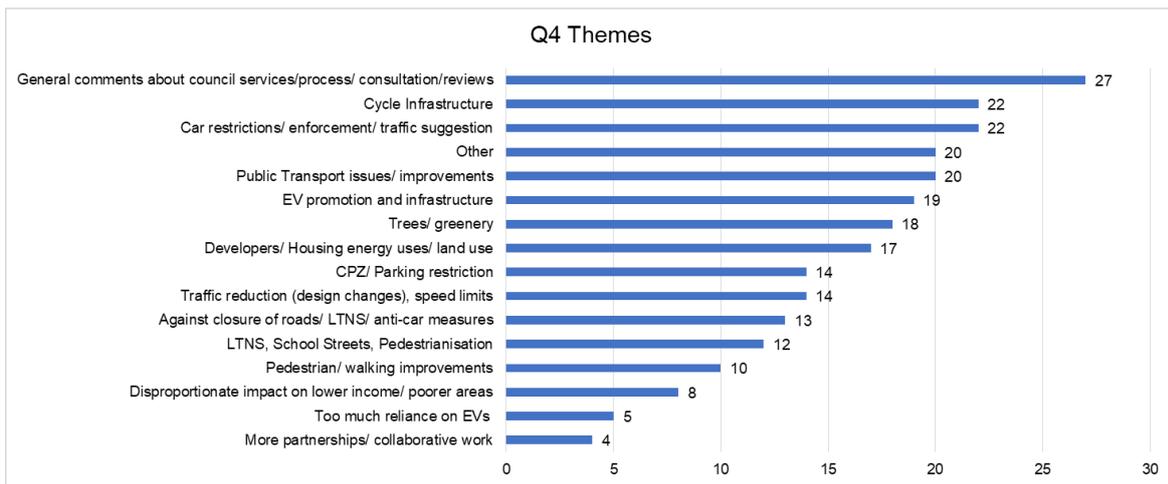
N	GLA recommended categories	Some Examples of Suggestions made.
1	Monitoring and other core statutory duties: maintaining monitoring networks is absolutely critical for understanding where pollution is most acute, and what measures are effective to reduce pollution and is one of a number of statutory duties	<p>As above stated.</p> <ul style="list-style-type: none"> • Suggestions were made about deploying more monitoring around sensitive receptors, public information and adoption of the WHO guideline published in 2021.
2	Emissions from developments and buildings: emissions from buildings account for about 15% of the NO _x emissions across London so are important in affecting NO ₂ concentrations.	<p>As stated above and the following:</p> <ul style="list-style-type: none"> • Stagger building developments where they are in close proximity. • Grants to replace boilers; advice and guidance on indoor pollution and how to tackle it."
3	Public health and awareness raising increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution	<ul style="list-style-type: none"> • More education is needed. Education and showing a benefit of the changes; more green spaces and encourage community involvement in the spaces maintenance and care; • Increase green infrastructures around schools • Encourage local businesses (perhaps by leading by example) to offer staff ways of purchasing a low or zero emission car.
4	Delivery servicing and freight: vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO ₂ emissions.	<ul style="list-style-type: none"> • Reduce HGV lorries and vehicles travelling from out of borough, through Lewisham/South circular • Reduce the amount of passing traffic/commuters due to having a lack of good employment, Schools, health services, resources etc. (Reduce the amount of people employed in Lewisham Council that live outside the borough, where possible) • consult on where new electric vehicle chargers are put and work with business to provide more local pick up places for deliveries
5	Borough fleet actions: our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO ₂ emissions. Tackling our own fleet means we will be leading by example.	<ul style="list-style-type: none"> • "It can lead by example! Change your polluting diesel fleet to fully electric! Get staff to cycle or walk - remove council parking at council buildings etc.
7	Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures; and	<ul style="list-style-type: none"> • To prioritise tackling high traffic levels in and around the A2/New Cross • Grants to replace boilers; advice and guidance on indoor pollution and how to tackle it."

N	GLA recommended categories	Some Examples of Suggestions made.
7	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	<ul style="list-style-type: none"> • Make walking and cycling safer on the roads. • Introduce CPZ across the borough. • Cycle storage, controlled parking. Get rid of the cars on our pavements and kill the rat runs. • Install charging points for electric vehicles on all residential streets. Provide improved cycling infrastructure. Connect residents with tradespeople who can check air quality and provide incentives to replace boilers. • Offer loans to business for electric delivery vehicles or cargo bikes • Subsidise electric vehicles • Make any LTN schemes work for all people and not just the privileged (. Re-think the placements of LTNs and road closures, or at least consider the impact this is actually causing. • Enforce anti - idling and take measures to reduce congestion in general • Provide more kerbside charging points. • Make driving as difficult as possible, make public transport as easy as possible • Address the traffic issue and stop cars coming into centre of or near streets to Lewisham shopping, make it all green and pedestrianised, no cars on streets where schools are, people should get trains. Plant more trees in nearby streets as they are a natural source of oxygen, and controls carbon dioxide. • More info about what air quality champion entails, and where to get smokeless fuel • More segregated cycle lanes to encourage people to cycle • There some negative comments about the ULEZ expansion, accused of causing rat runs on nearby roads like Horncastle Road and some positive comments stating that the scheme should be enforced to ensure that no buses or taxis that are not ULEZ compliant drive in the Borough.
8	Others	<ul style="list-style-type: none"> • Stop cutting down trees and building on green spaces • Strong enforcement of air quality policies • Grants, subsidies and incentives • Tell us how to avoid the dreadful air and how to protect children • small council tax discount fir front hedges • Recycle our waste instead of burning it and encourage green transport options for all. Don't penalize those who own cars - instead those who enter the borough. • Integrate SUDS into any public realm changes. There seems to be little joined up thinking

N	GLA recommended categories	Some Examples of Suggestions made.
		<p>between highways, planning and the rest of the council on green initiatives.</p> <ul style="list-style-type: none"> • Advise citizens on how to get finances for these expensive things • Clean the street and improve waste collection across the borough • Make residents have disposable income to cover cost of lifestyle changes

Note on Q8: There were 158 responses to this part of the question.

Improving of traffic measures, generally negative comments about the LTN, pedestrianisation scheme, road safety, increasing infrastructure for cleaner vehicles, controlled parking were the most discussed interventions. Some more generic comments were made requiring input from different teams, including Public Health, Environmental protection, Carbon resilience, Waste management and street cleansing, Planning, Parks and open space (green scene). Detailed responses/actions are presented in appendix B of this report. The word clouds analysis output carried out using R/R Studio software, for Q8 shows car use, active travel, car and vehicle use and electric car and infrastructures as the predominant words is as follows. The assessment is accordance with Q4 and Q5 as follows.



We have considered the following measures to achieve some of the queries raised:

Walking and Cycling Infrastructure: The cycling strategy looks at where cycling in the London Borough of Lewisham (Lewisham) is at and where it aspires to take it in the near future.

Promoting Low Emission transport and infrastructure : We will increase the proportion of electric and low-emissions vehicles in Car Clubs. Also, we aim to install at least five ULEV charging points per year, subject to funding being identified

Parking enforcement: Extending our CPZs borough wide would be a key tool as part of the Councils approach to tackling the Climate Emergency and reducing the impact of the car on the environment and health.

Anti-idling: We will have Idling Action Events and workshops on air quality in schools. We are participating in the Pan London Anti-Idling Project to raise awareness and include enforcement.

LTN concerns: The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like

this, surrounding roads are likely to become more congested while drivers adjust to the new layout. There are mixed views about LTNs and require statutory consultation, this allows residents to engage with measures that will be introduced on their roads. Lewisham remain committed to the outcomes that LTN's achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans.

Alternatives to delivery and freight management: We are managing the impact on air quality of delivery services, prioritising loading for ultra-low emission delivery vehicles and making progress on the Council's own move to low emission vehicle use.

Table 9. Q9 what is your name and address? (This question is optional and will not be disclosed). Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection Regulations (GDPR).

Note: There were 93 responses to this part of the question.

Table 10 Q10. What is your email address? (This question is optional and will not be disclosed).

Note: There were 109 responses to this part of the question.

Equal Opportunities Monitoring

Table 11 Q11. Why are we asking you for this information?

The following monitoring questions help us to be fair and inclusive in the work that we do. All of these questions are optional and you do not have to answer them.

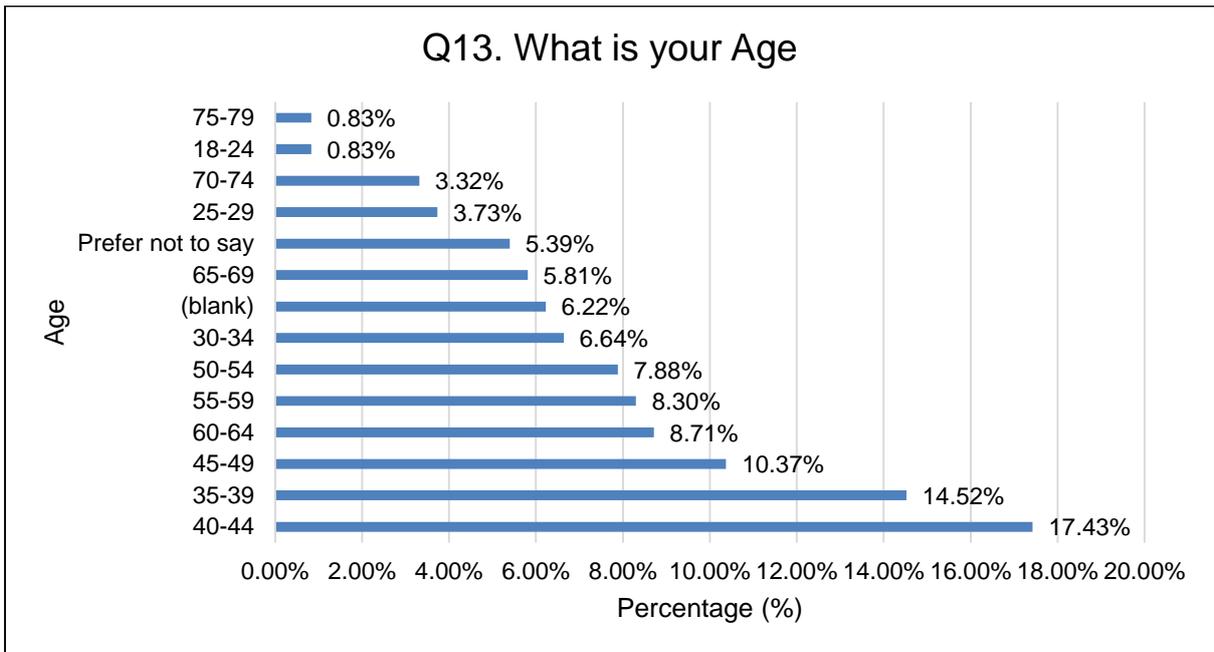
The personal data that you do provide is used to help us understand who is sharing their views and influencing our decision-making, though your identity will remain anonymous.

This data is also used to ensure that nobody is discriminated against unlawfully in the provision of our functions and services.

Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection

Table 12 Q12. What is your age?

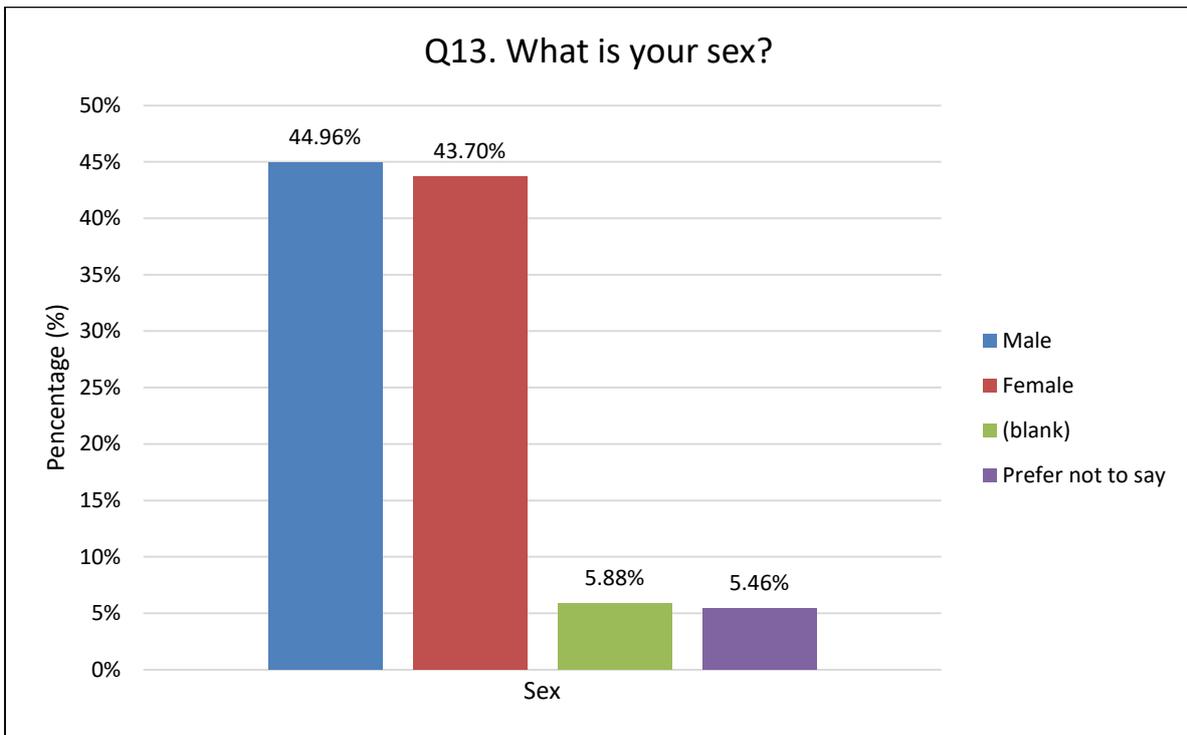
Age	Count of Response ID	Count of Response ID
40-44	42	17.43%
35-39	35	14.52%
45-49	25	10.37%
60-64	21	8.71%
55-59	20	8.30%
50-54	19	7.88%
30-34	16	6.64%
(blank)	15	6.22%
65-69	14	5.81%
Prefer not to say	13	5.39%
25-29	9	3.73%
70-74	8	3.32%
18-24	2	0.83%
75-79	2	0.83%
Grand Total	241	100.00%



1. The highest percentage of responses were from people age between 40-44 with the lowest among the youngest and the elders.

Table 13 Q13. What is your sex?

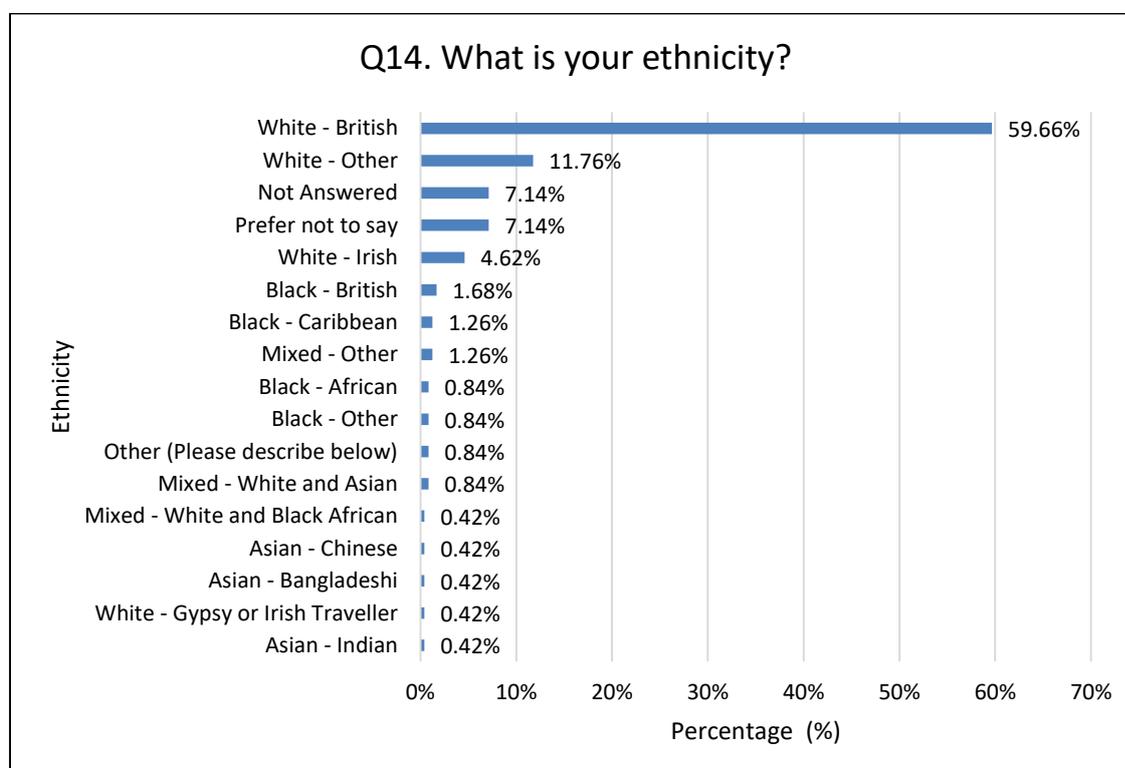
What is your sex?	Male	Female	(blank)	Prefer not to say	Grand Total
Percentage	44.96%	43.70%	5.88%	5.46%	100.00%
Count of Response ID	107	104	14	13	238



2. The percentage of male respondents was slightly above that of female respondents

Table 14 Q14. What is your ethnicity?

Response	Count of Response ID	Percentage
Asian - Indian	1	0.42%
White - Gypsy or Irish Traveller	1	0.42%
Asian - Bangladeshi	1	0.42%
Asian - Chinese	1	0.42%
Mixed - White and Black African	1	0.42%
Mixed - White and Asian	2	0.84%
Other (Please describe below)	2	0.84%
Black - Other	2	0.84%
Black - African	2	0.84%
Mixed - Other	3	1.26%
Black - Caribbean	3	1.26%
Black - British	4	1.68%
White - Irish	11	4.62%
Prefer not to say	17	7.14%
Not Answered	17	7.14%
White - Other	28	11.76%
White - British	142	59.66%
Grand Total		100.00%

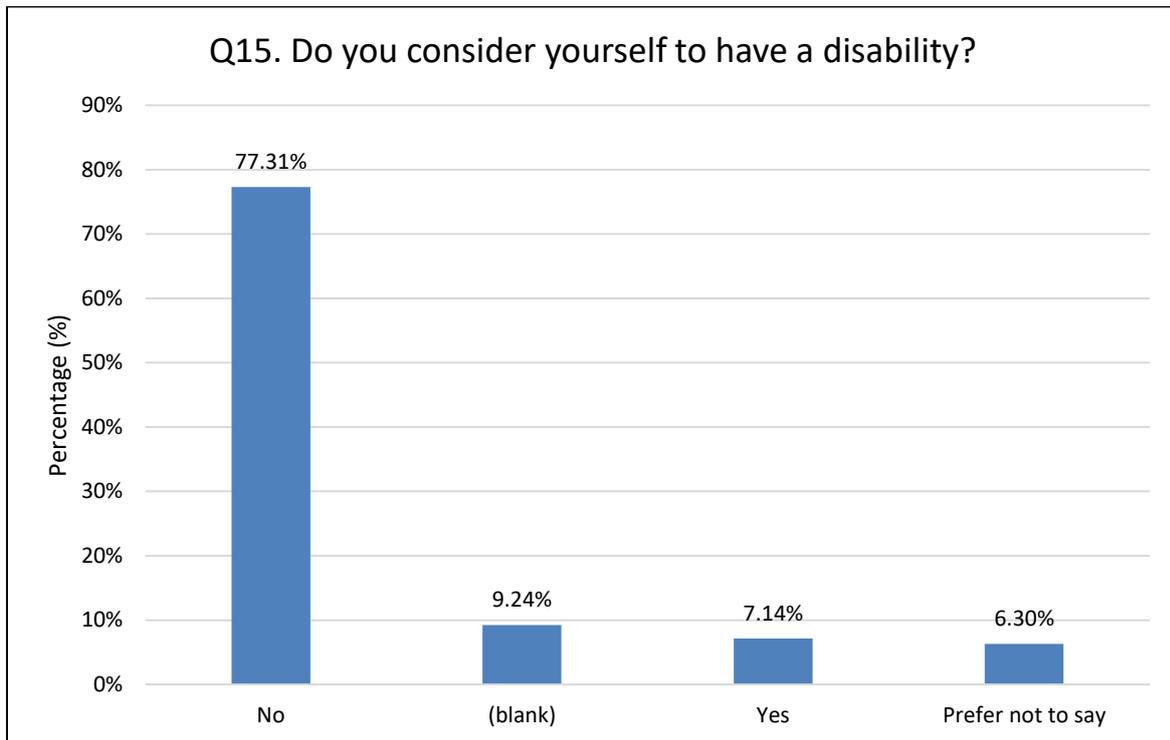


- Most respondents were white and the rest distributed among other groups. Lewisham is 53% white and 47% Black and Minority Ethnic (BME) therefore the highest respondent are likely to be from white people.

Table 15 Q15. Disability

Do you consider yourself to have a disability?

Response	Count of Response ID	Percentage
No	184	77.31%
(blank)	22	9.24%
Yes	17	7.14%
Prefer not to say	15	6.30%
Grand Total	238	100.00%



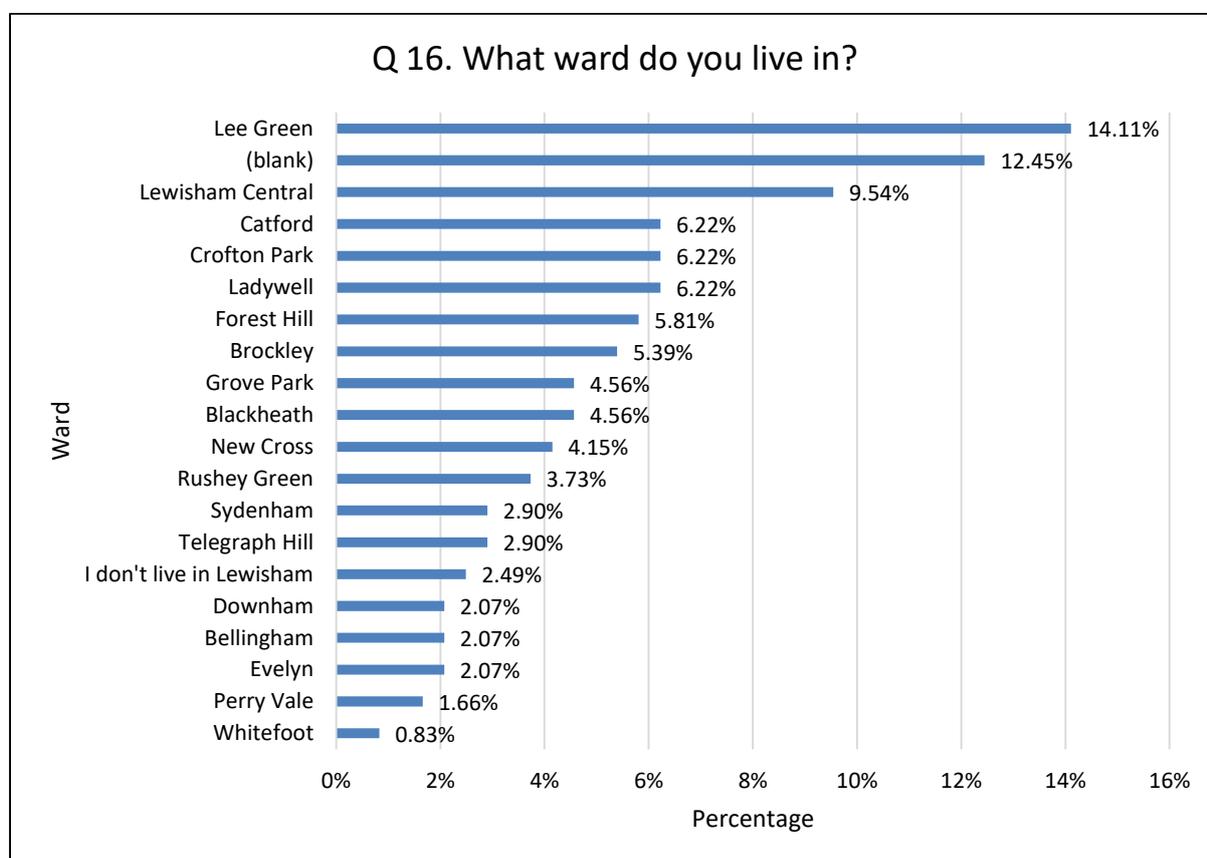
- Over 77% respondents were not disabled but 7.14% were disabled with disabilities distributed across all categories.

Do you have any access requirements?

Easy read, step-free access, accessible toilets, wheelchair access were some of requirements cited.

Table 16 Q16. What Ward do you live in??

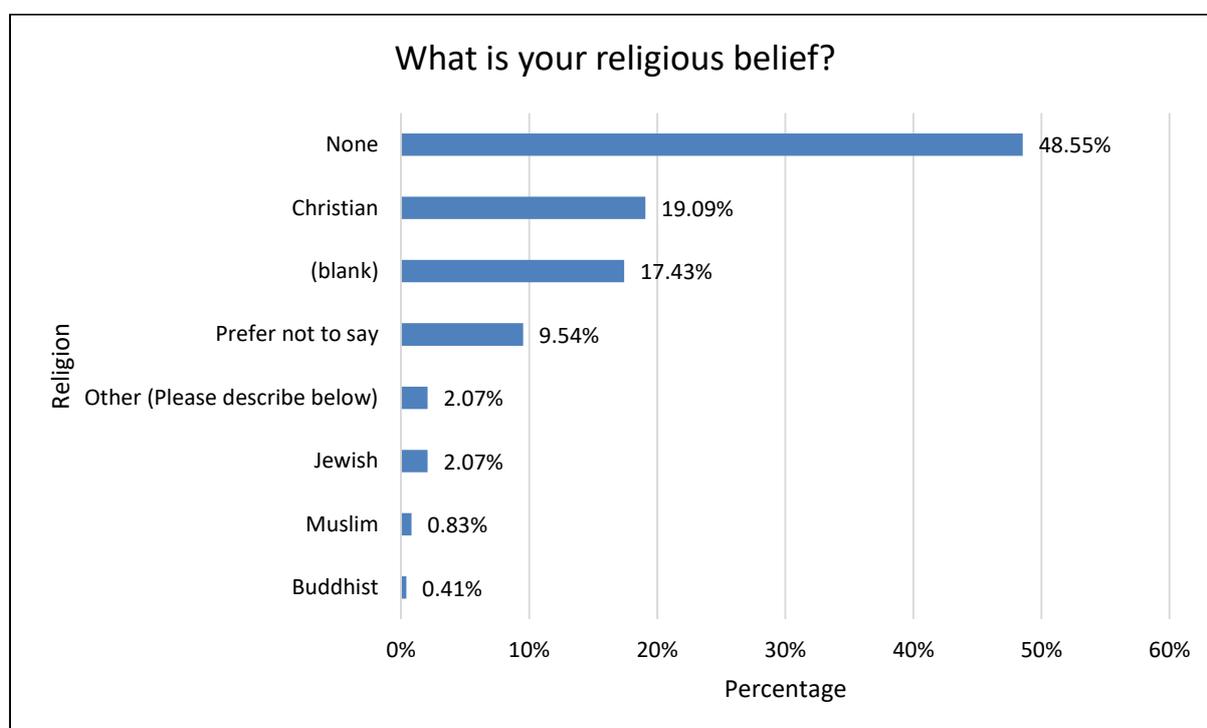
Ward	Count of Response ID	Percentage
Whitefoot	2	0.83%
Perry Vale	4	1.66%
Evelyn	5	2.07%
Bellingham	5	2.07%
Downham	5	2.07%
I don't live in Lewisham	6	2.49%
Telegraph Hill	7	2.90%
Sydenham	7	2.90%
Rushey Green	9	3.73%
New Cross	10	4.15%
Blackheath	11	4.56%
Grove Park	11	4.56%
Brockley	13	5.39%
Forest Hill	14	5.81%
Ladywell	15	6.22%
Crofton Park	15	6.22%
Catford	15	6.22%
Lewisham Central	23	9.54%
(blank)	30	12.45%
Lee Green	34	14.11%
Grand Total	241	100.00%



3. The majority-i.e. 14.11% live in Lee Green and 9.54% in Lewisham Central. 12.45% did not answer this question.

Table 17 Q17. What is your religious belief?

Religious belief	Count of Response ID	Percentage
Buddhist	1	0.41%
Muslim	2	0.83%
Jewish	5	2.07%
Other (Please describe below)	5	2.07%
Prefer not to say	23	9.54%
(blank)	42	17.43%
Christian	46	19.09%
None	117	48.55%
Grand Total	241	100.00%

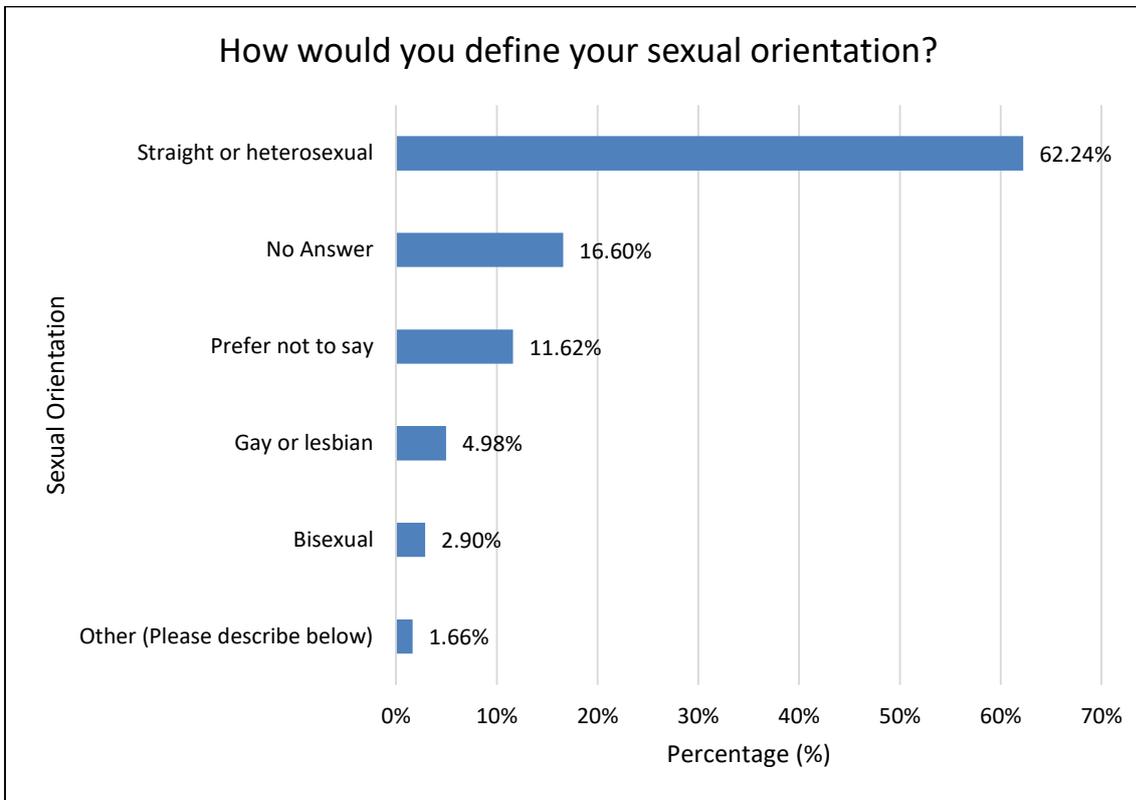


- The majority-i.e. 48.55% were not religion believers and 19.09% were Christians.

Table 18 Q18. How would you define your sexual orientation?

Sexual Orientation	Count of Response ID	Percentage
Other (Please describe below)	4	1.66%
Bisexual	7	2.90%
Gay or lesbian	12	4.98%
Prefer not to say	28	11.62%

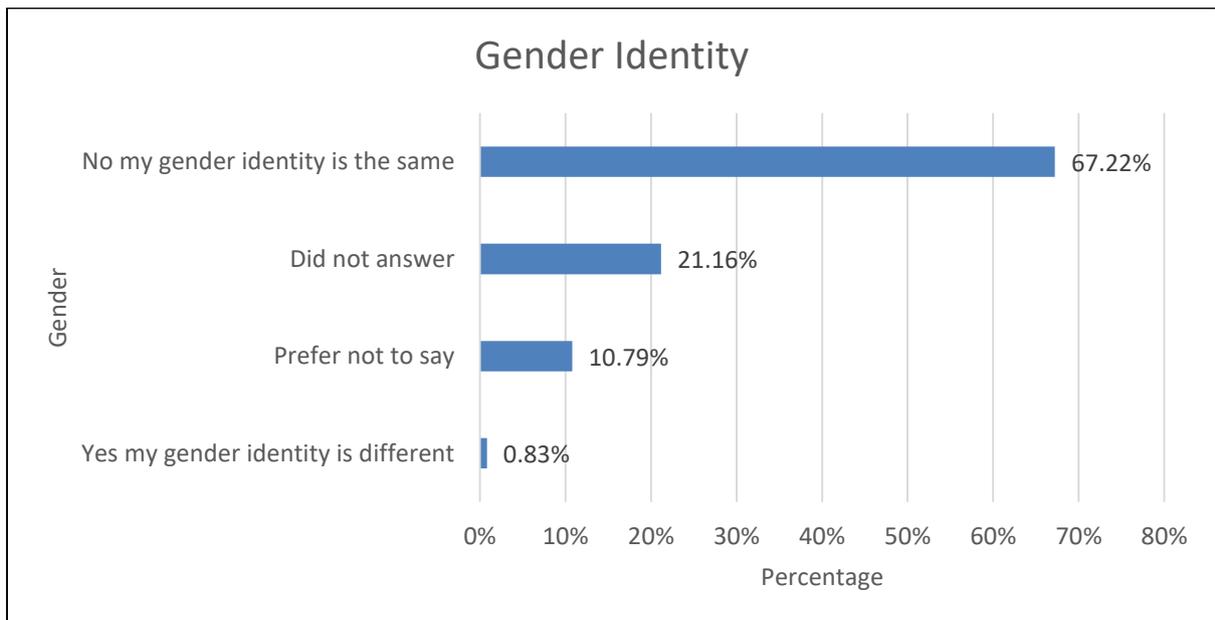
(blank)	40	16.60%
Straight or heterosexual	150	62.24%
Grand Total	241	100.00%



The majority-i.e. 62.24 % of respondents were straight or heterosexual

Table 19 Q19. How would you define your Gender Identity?

Response	Count of Response ID	Percentage
No my gender identity is the same	162	0.83%
Prefer not to say	26	10.79%
Yes my gender identity is different	2	21.16%
(blank)	51	67.22%
Grand Total	241	100.00%



- The majority-i.e. 67.22% of respondents have the same gender identity as the one they had at birth

4 **Conclusion and next stage**

Following consultation, the AQAP has been amended to include any feasible recommendations made during the consultation. Table 20 presents some of the modifications undertaken in the draft AQAP, prior to approval.

The Plan will be formally adopted by the Council and will be overseen by the Air Quality working Group. The Group will meet regularly and review the progress of each action. The Annual Status Reports published on the council webpage are produced as part of the Council's statutory local air quality management duties. The Report will include an update on the action plan measures as well as the latest air quality data.

We will continue to work with partners to search new technologies and new methods to deal with air pollution to reduce human exposure.

Many of the actions have funding and resources allocated to them. However, some have limited resources attached and may need input from third party organisation. LBL will actively pursue alternative sources of funding to implement the actions recommended.

There are a number of existing Council strategic documents that cover different aspects of the environment and sustainability complement our draft Air Quality Action Plan 2022-27⁶. These include among others:

- Our transport strategy and local implementation plan for 2019–2041⁷

⁶ <https://lewisham.gov.uk/airquality>

⁷ <https://lewisham.gov.uk/inmyarea/regeneration/transport-and-major-infrastructure/local-implementation-plan>

- New draft Core Strategy⁸
- Lewisham's Parks and Open Spaces Strategy⁹
- Lewisham Biodiversity Partnership's new action plan 'A Natural Renaissance 2021-2026'¹⁰
- New draft Waste Strategy¹¹
- New draft Flood Risk Management Strategy¹²
- Lewisham's Climate Emergency Action Plan¹³

The following documents are still under development and are also complementary to responses presented in this document and to the plan:

- Local plan (ongoing). Lewisham's new Local Plan will set out a shared vision for the future of the borough along with the planning and investment framework to deliver this vision through to 2040
- School Air Quality Action Plan (Ongoing)
- Results of LTN consultation response¹⁴
- Parking Strategy (Ongoing)
- The cycling strategy (Ongoing)

⁸ <https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/core-strategy>

⁹ <https://lewisham.gov.uk/inmyarea/openspaces/parks-and-open-spaces-strategy>

¹⁰ <https://lewisham.gov.uk/articles/news/creating-a-greener-lewisham-new-biodiversity-action-plan-endorsed>

¹¹ <https://lewisham.gov.uk/myservices/wasterecycle>

¹² <https://consultation.lewisham.gov.uk/environment/local-flood-risk-management-strategy/>

¹³ <https://lewisham.gov.uk/myservices/environment/making-the-borough-carbon-neutral-by-2030-climate-emergency-declaration>

¹⁴ <https://lewisham.gov.uk/myservices/roads-and-transport/tell-us-what-you-think-of-the-lewisham-and-lee-green-low-traffic-neighbourhood>

Table 20. Suggested modifications in AQAP Table 4.1 Action taken

Although the actions were grouped into seven categories: Monitoring and core statutory duties; Emissions from developments and buildings; Public health and awareness raising; Delivery servicing and freight; Borough fleet actions; Localised solutions; and Cleaner transport. We have made efforts to compile a response to each individual response as follows.

Action		Measure description	Responsibility	Outputs/Targets/Key Performance Indicators (KPIs) For info and to be deleted?	Further information For info and to be deleted?	Summary of Responses to the AQAP consultation Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues – Missed and Q8.What can Lewisham Council do to help you make these changes? -	Modifications carried out in the Drafts AQAP
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Air Quality (AQ) Monitoring	1.A	Maintaining and where possible expanding monitoring networks. Combined with other LA statutory duties, maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution.	EP ¹⁵ / Transport	All outputs and KPIs will be in accordance to London Local Air Quality Management (LLAQM) Framework ¹⁶ . KPIs include: Up to 75 further monitors will be deployed during the course of this Plan. We will use Template reports and KPIS provided by the GLA/DEFRA or other relevant parties involved.	The locations of monitors across Lewisham will be made available on LBL website ¹⁷ . We will give monitoring priority to focus areas, sensitive receptors like schools, care homes and Hospitals. London Atmospheric Emissions Inventory (LAEI) figures including new GLA focus areas will be published by end of 2021.	<ol style="list-style-type: none"> 1. Air quality monitoring is not taking place where it's most needed 2. There needs to be a rapid expansion of air quality monitoring to ensure equitable coverage across the borough, ensuring that every nursery and school has a dedicated monitoring device outside. The measurements should be available in real-time via an app and the website. Only then will we be truly able to assess the impact (or lack of impact) of the measures being introduced 3. where the council is unable to prioritise provision of monitoring devices, local residents should be offered the opportunity to purchase these and have them installed by the council 4. "It's good to focus on air pollution around schools but I would like to see it monitored/ addressed more around health care settings such as hospitals/ hospice/ homeless hostels/ care homes etc. 5. Congratulations on achieving a downward trend in pollution levels in Lewisham. The draft strategy is promising and The Forest Hill Society's Campaign for Clean Air SE23 welcomes these measures. However, given that tyre/break wear accounts for over half of particulate pollution, we have general concerns that the plan is too focussed on switching to electric vehicles rather than promoting a switch to active transport and the plan will therefore not achieve the new WHO PM guidelines. https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions. 6. Adopt the new lower WHO guidelines for NOx and Pm2.5 issued on 22.9.21. Quote the most recent guidelines in the report and change the strategy accordingly. 7. Lewisham monitoring complies with standards which involves looking at annual mean data. In addition to this, because risk to health is cumulative, Lewisham should also look closely at the daily highs and lows to give a more detailed picture to residents about actual exposure and times and when to avoid roads e.g. What is risk of exposure at rush hour/school pick up times when people are out and about? Share this data in strategy and reports. 	<ol style="list-style-type: none"> 1. Our air quality monitoring regime is reviewed each year to represent better the site settings and the objectives of the monitoring. Any suggestions about air quality monitoring should be directed to Environmental Protection inbox- no change to the AQAP. 2. There is a plan to install diffusion tubes in all schools where air quality is predicted to exceed the air quality objective. Air quality forecast can be access vis our website- no change to the AQAP 3. Residents can purchase their own monitor an installed is they so want. 4. There are plans to install monitors around all sensitive receptors and deprived areas as detailed in "further information"-no change to the AQAP 5. Lewisham will work toward achieving the new WHO guidance and monitor pollution in areas with high deprivation– the draft AQAP to be changed to accommodate the new guidance 6. As noted in 5 above 7. Resident can check pollution daily air pollution concentration via our website. No action needed 8. Partnership with citizen science will be considered¹⁸. This action will be included the AQAP. 9. Trends of the 2020 AQM results are considered as an anomaly due to the pandemic during all air quality assessment – no changes of the AQAP 10. Response to this question will be included in the LTN/transport/highway respond to be issued in addendum of this report. 11. As above noted 12. As above noted

¹⁵ EP=Environmental Protection Team

¹⁶ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

¹⁷ <https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels>

¹⁸ https://earthwatch.org/research/research-focus-areas?gclid=EAlaIqObChMI0Iry0Neu9QIVE4xoCR1lzgojEAAYASAAEgIQnvD_BwE

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						<p>8. Consider partnering with Dustbox to undertake "citizen science" community science monitoring (University of Cambridge/Goldsmiths) to improve picture of PM 2.5. They have already undertaken monitoring in Forest Hill and Deptford/New Cross. https://dustbox-logbook.citizensense.net/</p> <p>9. Treat 2020 AQM results as an anomaly due to the pandemic: e.g. NO₂ rates declined at roadside by 25% from 45.3 to 34.0 between 2016-2019, rather than the quoted 43% from 45.3 – 23.5 between 2016-2020 which gives an overly optimistic picture.</p> <p>10. No monitoring of pollution on roads with extra traffic dumped on them by LTNs</p> <p>11. Road closures/LTNs-----have been 'strategically' placed around the borough in areas that does not have the highest levels of pollution (or the poorest air quality) - Most road closures/LTNs E.G. Lee green and School road have caused traffic to be pushed onto main/central roads, such as the south circular/Brownhill Road and Lewisham high street,-----afield)</p> <p>12. The pollution coming from the South Circular and the other main roads, which are also residential, often by the poorer residents of the borough, was made much worse by the LTN. The monitoring of air pollution on these roads was inadequate, and the whole process has become overly politicised.</p> <p>13. Annual report on progress- overview by independent assessors to ensure rigorous application</p>	<p>13. Yearly Annual report on progress are reviewed independent consultants, checked and appraised by GLA/DEFRA prior to publication on our website.</p> <p>The "Love Clean Air" website presents all air quality data and industrial processes for Lewisham. Please refer to the following link for all the monitors in Lewisham and other boroughs located to the south of London https://lovecleanair.org/local-air/air-quality-map/#.YeFnrf3KnPk</p>
AQ Monitoring	1.A.1	NO ₂ diffusion tubes	EP/ Transport	<p>All outputs and timeline of reporting will be as agreed with all parties involved.</p> <p>We will update diffusion tube locations periodically to reflect changes in the environmental settings.</p> <p>Some historical tubes are to remain to fulfil the objective of the monitoring.</p> <p>KIPs:</p>	<p>In 2018, the network was extended to include 50 sites. In September 2020, further 51 diffusion tubes were installed across Lewisham as part of the Low Traffic Neighbourhood (LTN) project¹⁹; which makes a total of 101 diffusion tubes (excluding the duplicates) installed across the borough. The continuity of the later</p>	As above noted.	As above noted. We will install more diffusion tubes in the most deprived areas across the borough.

¹⁹ <https://lewisham.gov.uk/articles/news/changes-to-lewisham-and-lee-green-low-traffic-neighbourhood-announced>

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				<p>We will aim for:</p> <ul style="list-style-type: none"> • Over 95% data capture. • Produce an inventory of the number of monitoring sites and regularly review as appropriate. • In 2021, the ASR was submitted as agreed with the GLA. 	monitoring regime will depend on funding.		
AQ Monitoring	1.A.2	Borough's automatic monitors	EP/ Transport	<p>All outputs and KPIs will be produced as recommended by GLA/DEFRA and the LLAQM scheme.</p> <p>We will Continue to monitor via 4 automatic monitoring stations and help with the Imperial College London supersite at located Honor Oak Park²⁰.</p> <p>Priority will be given to seeking funding for new PM_{2.5} monitors, to help with assessing compliance with meeting the new WHO targets by 2030.</p> <p>We will support all research projects as appropriate.</p>	The addition of further PM _{2.5} monitors will depend on funding.	As above noted.	As above noted – no change to the draft AQAP
AQ Monitoring	1.A.3	Real time trialling monitoring using Sensors	EP/ Transport	All outputs and reporting to be agreed with all the parties involved.	Examples of trialling sensors installed or to be installed in Lewisham include:	As above noted.	As above noted – no change to the draft AQAP

²⁰ These form part of a £6m investment into three new air quality supersites– established by the Natural Environment Research Council (NERC).These site were established by the Natural Environment Research Council (NERC) in June 2019. The other sites are located in Birmingham and Manchester.

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		There are uncertainties associated with these new technologies, which have not yet been validated for regulatory usage. ²¹		All project specific reports will be made available on our website for consultation by the public. Specific KPIs include: <ul style="list-style-type: none">• Over 60% data capture and• Assess the effectiveness of sensors to monitor the success of the relevant interventions that is being implemented.	Three Breathe London community sensors and AQ map ²² and our exiting three AQY air quality sensors installed around the LTN scheme ²³ .		
AQ Monitoring	1.A.4	Addressing current WHO targets for PM2.5 especially at a minimum.	All	Outputs, KPIs and reporting per the upcoming Environment Bill if adopted. Maintain the existing PM2.5 monitors. LBL will be compliant with the targets legislated in the upcoming Environment Bill.	LBL will follow all the policies, regulation and guidance associated with the Environment Bill when adopted by the parliament. If the Environment Bill does not include current WHO targets for PM _{2.5} , LBL will continue the work toward reducing this pollutant.	Adopt the new lower WHO guidelines for NO _x and PM _{2.5} issued on 22.9.21. Quote the most recent guidelines in the report and change the strategy accordingly.	We will work toward achieving the new WHO guidance ad detailed in the previous section- references to the new Who will be included in the AQAP.
Core statutory duties	1.B					As above noted.	As above noted – no change to the draft AQAP
Core statutory duties	1.B.1	Annual Status Report (ASR)	Environmental Protection/ Transport	Submission and review following comments on the report by GLA/DEFRA and publication on our website. KPI as:	The impacts of COVID-19 and the associated restrictions on activities may impact the reporting process.	As above noted.	As above noted – no change to the draft AQAP. The data for 2020 will be excluded for further air quality assessment because the decrease is due to the pandemic and the relevant restriction in traffic imposed by the government.

²¹ Please refer to the guidance under development by Defra's independent Air Quality Expert Group (AQEG)

<https://uk-air.defra.gov.uk/library/aqeg/pollution-sensors.php>

²² <https://www.breathelondon.org/>

²³ <https://www.campbell-associates.co.uk/product/aqy-micro-air-quality-monitor>

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				All ASRs submitted on time, approved by GLA and published on our website.			
Core statutory duties	1.B.2	Update AQAP every five years at a minimum and follow LLAQM guidance	EP/ Transport	<p>This plan will be reviewed before end 2027.</p> <p>KPI as:</p> <ul style="list-style-type: none"> • Meet AQAP submission deadline • Delivery a wide-reaching public consultation • Publication on website • Report on progress annually via the ASR. 	<p>The review will follow the prescribed GLA/DEFRA guidance at the time.</p> <p>Our AQMAs will be undertaken before December 2024 and every four years after.</p>	As above noted.	As above noted – no change to the draft AQAP
Emissions from developments and buildings	2	Ensuring emissions from construction are minimised	Planning/ EP /Transport	<p>Adoption of new Lewisham Local Plan by 2022/23.</p> <ul style="list-style-type: none"> • Continue to Work closely with planning to reduce dust from construction activities. <p>We will continue using our planning powers to enforce air quality measures, reduce emissions, increase energy efficiency and adoption of Planning Policy that is encouraging car-free developments.</p> <ul style="list-style-type: none"> • Statistical data to be included in ASR. • Log, investigate and enforce all complaints. <p>KPIs include:</p> <ul style="list-style-type: none"> • Ensure 100% of all major planning applications have 	<p>Register of NRMM are secured in planning conditions with Construction Environmental Management Plans (CEMPs).</p> <p>An overall reduction of the current LAEI construction related PM₁₀ & PM_{2.5} emissions is anticipated.</p>	<ol style="list-style-type: none"> 1. Why are only 'Most' major planning applications now subject to air quality and dust conditions? Why not all? What is the percentage that are not and what is the rationale for excluding these? Why Minor sites are not also included now that they too are subject to the Mayor's NRMM LEZ? Nine unit minors in particular, and especially where these are contiguous, are very significant contributors to poor AQ. Why are Civil and Infrastructural projects not also subject to special restrictions on the NRMM in use, either in overarching procurement contracts or otherwise. Are the generators and NRMM used in the set-up of events, festivals or film shoots subject to requirements for the emissions stage deployed? Would the model planning condition applied to sites in regard to Dust and AQ be a useful appendix to the AQAP? 2. "New developments should be insulated to passive haus standards with sustainable energy like ground source, green roofs and green space 3. Enforce existing planning regulations" 4. I would encourage you to be bolder. For instance we are seeing the first examples of municipalities making heat pumps the standard for new builds. Houses are set to become the biggest source of emissions in the borough and the council should start to set the tone, beginning with your own estate but also to new developments. Residents will then gradually follow suit when boilers need replacing. There also doesn't appear to be firm commitments to active travel or anything about promoting cycle storage in new developments. I would also like to see a strategy for increasing tree canopy coverage with more street trees across the 	We will adopt air quality mitigation measures for all developments. We are compiling a Local Plan that will address all the issues relevant to sustainable development.

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				CMP, NRMM and AQDP conditions/air quality and dust enforcement actions. <ul style="list-style-type: none"> • Maintain register of pollution control conditions • Reduction in complaints. 		<p>borough (building on the work done by the Brockley Society for example). This has the added benefits of flood protection and lowering temperatures during heat waves.</p> <ol style="list-style-type: none"> 5. The amount of construction taking place, building high-rise flats is excessive and increasing poor air quality." 6. "Making retro-fitting a priority over demolition and building. 7. Encourage tree-planting." 8. More robust regulations for developers to enforce not "encourage" change. E.g. Remove all car parking in new developments apart from electric/exemptions for disabled use. Ensure all developments are subject to air quality conditions, not "almost all". 9. Bravo on improving council buildings but more is needed for private residences 10. Constructing new buildings creates more pollution than refurbishing/retrofitting existing ones. I would therefore like to see Lewisham reflect this in the decisions it makes on planning applications. And if new buildings have to be built at all, low carbon construction materials should be used - e.g. timber instead of concrete. 11. Promoting the use of electric vehicles is all very well, but unless the electricity is generated 100% renewably, pollution is still being created somewhere. People need to be using less energy overall (as the current energy crisis illustrates), so I'd like to see less emphasis on electric cars and more emphasis on using public transport. 12. Switching to 100% renewable electricity in council buildings is a good start, but it would be good if Lewisham residents could be encouraged to do this in their own homes too." 13. More robust regulations for developers to enforce not "encourage" change. E.g. Remove all car parking in new developments apart from electric/exemptions for disabled use. Ensure all developments are subject to air quality conditions, not "almost all". 14. Also, a big omission is the role of electric bikes and scooters. 	

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Emissions from developments and buildings	3	Ensuring enforcement of non-road mobile machinery (NRMM) air quality policies	Planning/ EP	<p>We will aim to register all major developments for NRMM. A quarterly compliance report will be produced.</p> <p>LBL achieved 100% site compliance in 2020.</p> <p>KPIs include:</p> <p>Data on number of NRMM conditions recorded, and all sites checked on the NRMM database once construction begins and also data on enforcement.</p>	<p>LBL is part of a pan-London project MAQF NRMM Zone enforcement – to inspect construction sites in every borough, to ensure they are using the cleanest construction equipment.</p>	As above noted	As above noted.
Emissions from developments and buildings	4	Reducing emissions from CHP and enforcing CHP air quality policy. Ensure smaller developments use ultra-low NOx Boilers or other zero carbon low emission options.	Planning	<p>We will aim to recommend ultra-low to zero emission combustion plant for all developments.</p> <p>KPIs include:</p> <ul style="list-style-type: none"> • Number of conditions requiring high efficiency boilers and ultra-low NOx boilers or other low carbon low emission heating. • Number of secondary heat sources integrated into heat networks. • Number of existing combustion-based CHP engines removed/replaced with cleaner, lower carbon heat sources. 	<p>Planning to refer relevant discharge of conditions to EP. The EP team will continue to review air quality assessments/energy strategies to ensure compliance.</p> <p>We will investigate setting a requirement for evidence of maintenance of CHPs.</p>	No comment made on this.	No changes to the draft AQAP.
Emissions from developments and buildings	5	Enforce Air Quality Neutral policy	Planning/ EP/transport/Climate Resilience	Report statistics on compliance via the ASR and the planning portal.	We will include Air Quality Neutral requirements in the	No comment made on this	No changes to the draft AQAP.

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Category	ID						
				<p>KPIs include:</p> <p>We will determine the number of development proposals meeting the air quality neutral standards.</p>	Council's Local Plan Policies.		
Emissions from developments and buildings	6	Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new and existing developments	Planning	<ul style="list-style-type: none"> Regularly produce map of green space. Area of green space incorporated into new developments and apply London Plan Policy principles in development opportunities. <p>KPIs include:</p> <ul style="list-style-type: none"> Numbers of proposals or projects where green infrastructure is used or enhanced to provide low exposure walking and cycling routes. For stand-alone green infrastructure projects consider using exposure reduction targets as project KPIs. 	<p>Ensuring that exposure in amenity spaces is considered at the design stage and as part of the Air Quality assessment for new development and redevelopment proposals.</p> <ul style="list-style-type: none"> Proportion of major planning applications where green amenity spaces are in areas of low exposure. 	<ol style="list-style-type: none"> Seems to be low consideration of green infrastructure or green spaces, parks and planting to help improve air quality as well as provide nicer, greener, cleaner areas "New developments should be insulated to passiv haus standards with sustainable energy like ground source, green roofs and green space Produce a more detailed Strategy for mitigation for schools on main roads unable to join school streets programme (money for air filters/green screens) -Green screens for homes facing main roads. Properly look after already mature trees. Properly look after the assets the council already has. Encourage tree-planting." "Stop cars coming into centre of or near streets to Lewisham shopping, make it all green and pedestrianised, no cars on streets where schools are, people should get trains. Plant more trees in nearby streets as they are a natural source of oxygen, and controls carbon dioxide. Offer advice and support to my local nursery to plant and maintain an effective green barrier. Stop cutting down trees and building on green spaces Education and showing a benefit of the changes; more green spaces and encourage community involvement in the spaces maintenance and care; Support street "greening". 	Further measure are being considered in the new Strategy for Parks & Open Spaces. We are investing in green spaces across the borough including new green spaces such as Charlottenberg Park in New Cross, as well as the transformation of Beckenham Place Park and the introduction of the Greening Fund that allows local community groups to bid up to £40,000 for green infrastructure ²⁴ .
Emissions from developments and buildings	7	Ensuring that Smoke Control Zones are appropriately identified and fully promoted and enforced.	Environmental Protection /Crime Enforcement Regulation (CER) /Food and safety	Respond and report on complaints and action taken. To include: an awareness campaign, engagement with suppliers, and active enforcement and campaign initiated by end 2022.	We will record all complaints of dark smoke investigated within a standard timeline by the enforcement team as appropriate. <ul style="list-style-type: none"> Enforcement action taken where appropriate. 	<ol style="list-style-type: none"> The Council needs to grow a pair. The reason things are so rubbish here is because you don't punish people for doing the wrong thing. You can basically do what you want knowing that the council will do nothing about it, that includes, speeding drivers, HGVs ignoring road signs, fly tipping, burning rubbish in your garden, parking massive cars on the pavement, idling all day and night, dog crap EVERYWHERE, parks left in disrepair, streets with rubbish everywhere, public spaces used and abused by the general public. People do these things because there is no repercussions." 	The borough of Lewisham is a smoke control area. This means you can't emit smoke from a chimney unless you're burning an authorised fuel or using an exempt appliance. Reference should be made to "Rules for chimneys, bonfires, open fires and wood burning stoves" available as follows https://lewisham.gov.uk/myservices/environment/air-pollution/rules-for-chimneys--bonfires-and-open-fires

²⁴ <https://lewisham.gov.uk/inmyarea/openspaces/parks/beckenham-place-park>

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				<ul style="list-style-type: none"> Develop information packs and plan engagement with businesses, residents and other members of the public. All fuel suppliers in the borough engaged, and 50% showing point of sale information about cleaner fuels. <p>KPIs include: Environmental Health Officers/Trade Standard officers to be trained for enforcing the new AQ solid fuel regulations starting May 2021.</p> <ul style="list-style-type: none"> Reduce the number of smoke related complaints by 50%. Estimated reach of awareness campaigns Number of suppliers engaged. Increases in the number of enforcement visits/actions taken. Number of Officers trained in enforcement 	<ul style="list-style-type: none"> Annual reports of smoke control areas and clean air complaint to be procured. We will continue to search funding to carry out other work and be part of the London wood burning group. Residents engagement via council newsletter articles, and press release with local papers. 	<p>2. "Most of these proposals are way, way too weak - only a £300 fine for breaking the law on burning materials? Businesses won't even blink at that, and see it as a minor inconvenience. You will only 'promote' sustainable transport to building developers, and 'consider' enforcement action against polluters?! Come on! The time for 'considering' and 'promoting' is over - polluters must pay, and in amounts that force them to change their behaviour.</p> <p>3. BURNING:</p> <ul style="list-style-type: none"> Communicate Burning Restrictions better. Educate better. Enforce better. People in Forest Hill area regularly burn garden waste and use wood burning stoves and outdoor stoves/fire pits as well as allotments. This is especially inappropriate in areas around busy roads. Consider reducing cost for garden waste collections to make it more viable for people to compost their garden waste rather than burn it." Communicate Burning Restrictions better. Enforce better. The Smoke control measures are pointless and ineffective. So many people have bonfires and have installed wood burners - the only way to stop or control this is through effective enforcement. Same with vehicle idling - this is a major problem across the borough and the only way to tackle it is enforcement through fines and reduction of parking bays on high streets. The burning of fires in peoples gardens is epidemic, this should be completely banned, no exceptions. Nobody polices this and it is terrible what it does to air quality during the summer months. You should make brown bins free and available to all properties to help avoid this." <p>4. Recycle our waste instead of burning it and encourage green transport options for all. Don't penalize those who own cars - instead those who enter the borough.</p> <p>5. Lewisham Council also needs to do more to tackle the burning of garden waste. I have made several complaints to the Council about neighbours burning their garden waste (including plastic waste) and nothing has been done about it."</p> <p>6. Lewisham Council also needs to do more to tackle the burning of garden waste. I have made several complaints to the Council about neighbours burning their garden waste (including plastic waste) and nothing has been done about it."</p> <p>7. Completely ban wood-burning stoves. It is absurd to suggest that some WBSs are ""clean"" or that owners of WBSs don't burn heavily polluting materials. Some wealthy residents want their</p>	<p>All new developments should ensure that air quality is considered when installing domestic burners. All stoves need to be Defra approved as a minimum. Stoves should comply with the 'EcoDesign Ready' specifications introduced by The Stove Industry Alliance. A list of compliant stoves can be found on the HETAS website HETAS, Ecodesign Compliant Stoves & Boilers. Website: https://www.hetas.co.uk/ecodesign-compliant-stoves/</p> <p>All home owner should be made aware of the Government's goals in the 2019 Clean Air Strategy relating to emissions in the home. In particular, the following government goals should be taken into account:</p> <ul style="list-style-type: none"> Legislate to prohibit the sale of the most polluting fuels. From February 2021 the government has proposed a mandatory certification scheme demonstrating that wood sold in volumes under 2m³ is dry (less than 20% moisture) and a ban on the sale of all bagged traditional house coal. The new Air Quality (Domestic Solid Fuels Standards) (England) Regulations also came out in 2020. Suppliers and retailers of fuels identified as being in breach of the legislation (e.g. fuel incorrectly labelled, uncertified fuel) could be fined for selling unauthorised fuel. This could be either a £300 fixed penalty fine for each offence identified, or a more substantial fine issued by the courts depending on the severity of the offence. Lewisham Council Crime Enforcement and Regulation Service (CER) officers were trained to enforce this regulation. Ensure that only the cleanest stoves are available for sale by 2022; Work with consumer groups, health organisations and industry to improve awareness of non-methane volatile organic compounds (NMVOC) build-up in the home, and the importance of effective ventilation to reduce exposure; Consult on changes to Building Regulations standards for ventilation in homes and other buildings, to help reduce the harmful build-up of indoor air pollutants. <p>No further changed to the draft report. Further details will be provided in LBL Local plan (ongoing).</p>

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						WBSs, but Lewisham Council should not be pandering to their wishes."	
Emissions from developments and buildings	8	Promoting and delivering energy efficiency and zero carbon 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.	Climate Resilience/GLA /	<p>We will produce yearly statistics and/or qualitative data on actions taken to raise awareness, number of complaints and enforcement actions taken by the council.</p> <p>KPIs include:</p> <ul style="list-style-type: none"> • Reduce CO₂ emissions by 40% by 2025 and being Zero-Carbon by 2050. • No. of schemes using RE: FIT and RE: NEW as the programme guarantees the amount of CO₂ emissions reduced (GLA) 	<p>Tracks the percentage of the boroughs social housing stock which has been updated through the RE: NEW scheme. (GLA)</p> <ul style="list-style-type: none"> • Increase in the vulnerable households to access external grant funding for heating, insulation and ventilation works. 	<p>1. Also, what about dealing with the air pollution from boilers, and aiding the transition to better heating? This is a major problem coming, not far now, and residents will need help from the council and the government."</p> <p>2. Produce A "How to" guide/one stop shop on your webpage for private homeowners- e.g. publish average costs, endorse trusted providers in Lewisham. Make it easy for the people who can afford it to make improvements/ boiler switches.</p> <p>3. Improved insulation of residential properties reduces the amount of fuel for heating in winter and cooling in summer. Flat roof tops with poor insulation exacerbate this as do buildings with lots of glass windows. I'd like to see a pledge where no new builds have lots of glass windows without some measures to mitigate the heat that comes through the glass. As climate increases I think we need to look more to the Mediterranean approach where by screening is outside the glass. I'm speaking from my own current circumstances."</p> <p>INSULATION/BUILDING IMPROVEMENTS:</p> <p>4. Bravo on improving council buildings but more is needed for private residences</p> <p>5. A new scheme within Lewisham to inspire home owners to undertake improvements to their private residences. The last scheme had very low uptake. There is general confusion about whether it is still available.</p> <p>6. -Produce A "How to" guide/one stop shop on your webpage for private homeowners- e.g. publish average costs, endorse trusted providers in Lewisham. Make it easy for the people who can afford it to make improvements/ boiler switches.</p> <p>7. Communicate Burning Restrictions better. Enforce better.</p> <p>8. I'd like more info on heat pumps and more help to buy one affordably. Could the council organise something like the collective bidding process for solar panels?</p> <p>9. Subsidise replacement greener types of heating. Maintain a good bus service. Install more charging points for electric vehicles.</p> <p>10. Grants to replace boilers; advice and guidance on indoor pollution and how to tackle it."We would need a financial incentive to upgrade our boiler, which is already low emission. "Provide advice on energy-efficient boilers and provide grants to incentivise residents to upgrade old/inefficient appliances.</p>	The comments have been noted. This will be incorporated in Lewisham's Climate Emergency Action Plan.

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						<p>11. As a school, the large infrastructure projects such as changing boilers or installing charging points would need to be funded by capital grants.</p> <p>12. "- negotiate bulk discounts with trusted suppliers e.g. if X% of residents on a given road can replace their boilers to be low emissions, the whole road will have a discount on supply/install</p> <p>13. Lewisham needs to start a campaign to get people to install low emission boilers and give funding support to encourage this. "Reductions for outlay for these provisions, including Wi-Fi so less travel is needed. Even 10% off a boiler etc.</p> <p>14. Events, festivals, that preach the zero Carbon message</p> <p>15. Lewisham Council has allowed the management company of multiple blocks to continue installing gas boilers in council owned properties. What a waste of money and lack of forward thinking."</p>	
Emissions from developments and buildings	8.1	Develop and implement strategies for decentralised energy that convert gas heating to low and zero carbon alternatives including heat networks, and upgrade existing large combined heat and power communal heating to cleaner technology alternatives.	Climate Resilience Team/Planning	Development and Adoption of Decentralised energy strategy by end 2022. KPIs : We will use indicators to be included in the strategy to monitor progress.	Heat networks form an important part of the LBL's plan to reduce carbon and cut heating bills for customers.	No comment made on this.	No changes to the draft AQAP.
Emissions from developments and buildings	8.2	Introduce a requirement for a minimum EPC rating for privately rented sector HMOs covered by both the mandatory and additional licensing schemes. Introduce a requirement for any works covered	Private Sector/Housing (Environmental Health Residential)	We will keep a register of all private rented properties with minimum EPC rating. We will promote the regulation Energy Performance Regulation requirement. The target is to help all disabled facilities across the borough to meet level D EPC rating in privately	Lewisham intends to apply to the Secretary of State at the Ministry of Housing, Communities and Local Government for a borough-wide licensing scheme for privately rented with the intention to rolling out licensing to all 26,000 privately rented properties in the borough.	No comment made on this.	No changes to the draft AQAP.

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		by the Disabled Facilities Grant or discretionary housing improvement grants to meet level D EPC rating in privately owned accommodation.		owned accommodation and report annually. KPIs include: • Number of commercial and residential properties with minimum Energy Performance. • Number of private properties with disabled facilities that meet level D EPC rating in privately owned accommodation. • Number of commercial and residential landlords spoke to or number of event to promote the regulation.			
Emissions from developments and buildings	9	Master planning and redevelopment areas aligned with Air Quality Positive and Healthy Streets approaches.	Planning/EP/transport/Energy/Climate Resilience/ GLA/ TfL	Reporting as recommended in the London Plan approved in December 2020. • Report via the ASR and the planning portal the number of developments where air quality was considered at the design stage. KPIs include: Air Quality Positive specific metrics of success will be expected to be proposed for each selected measure, and more detail on this will be provided in new Guidance accompanying the London Plan.	• We will ensure that the planning teams considers new policies on air quality positive and healthy streets at an early stage in the development of plans. We will aim to log all applications with 100% Target.	Please refer to action 2.	Please refer to action 2.
Emissions from developments and buildings	9.1	Installation of residential electric	Planning/Parking/Transport	We will monitor and report on: the proportion of electric vehicles:	We will locate electric charging points in a way that does not interfere	1. The council is ideally placed to find a solution to charging vehicles parked on the street.	No changes to the draft AQAP. Comments noted and already considered in the draft plan.

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		charge points on new developments		number of lampposts or equivalent infrastructure which have been modified to enable EV charging; the number of rapid chargers installed; and the usage of existing EV chargers from the CPs in the borough.	with people walking or with disable people passing with wheelchairs. We currently have 100 plus charging points across the borough.	<ol style="list-style-type: none"> 2. Commitment to installing electric car charging points across the borough - this is key to getting people to switch to EVs 3. Upgrade its entire fleet of borough vehicles to electric only (this would have to go hand in hand with better EV charging infrastructure). 4. There is an unfortunate lack of focus on concrete development of active travel infrastructure, and attention to EV charging, which, while important should be a last resort in sorting out air pollution. 5. Provide more kerbside charging points. 6. Advise how I can charge an electric vehicle at home when I have no drive and need to park on the street. This could be clear policy on long cables, or some sort of charging infrastructure along the kerb or at lighting columns. 7. Subsidise installation of charging points and purchases of electric cars 	
Public health and awareness raising	10	Public Health department taking shared responsibility for borough air quality issues and Implementation of Air Quality Action Plans/ we will ensure that Directors of Public Health (DsPHs) have been fully briefed on the scale of the problem in our local authority area; what is being done, and what is needed.	Environmental Protection/Public Health	<ul style="list-style-type: none"> • Public Health is represented at Air Quality working Group. • Pharmacy and prescribers – to provide air quality information to Public Health to distribute to relevant groups. • Provide further material for engagement with vulnerable groups and active travel work. <p>KPIs include:</p> <ul style="list-style-type: none"> • Health Protection Committee will be required to sign off all Annual Status Reports and the Director of Public Health will sign off the air quality action. 	<ul style="list-style-type: none"> • Clinical commissioning Group (CCG) - This has a two-part objective, to raise awareness in a phased timeline to reach the following: <ul style="list-style-type: none"> -Deliver awareness training to the CCG. - Discuss asthma and air quality. Looking at how key messages can be included into the school asthma guidelines and raising awareness sessions. 	No comment on this action	No changes to the AQAP
Public health and awareness raising	10.1	The Council's political leadership will champion the issue of air quality inside and	Members of the Council, as designated	Report back to GLA on review and outcome with actions, then recruited	We will:- • Promote the Lewisham Air App, airTEXT and	<ol style="list-style-type: none"> 1. I think more education is needed 2. Education and showing a benefit of the changes; more green spaces and encourage community involvement in the spaces maintain ace and care; 	Comment noted. No action needed because LBL is aware of issues, which have been considered during the design of the plan.

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		<p>outside of the borough.</p> <p>Our current Air Quality Champion, Cllr Louise Krupski was appointed in May 2018, and has actively been engaging with the community, schools, and construction companies to promote actions to help reduce air pollution across the borough.</p>		<p>more School Air Quality Champion to:</p> <ul style="list-style-type: none"> • Raise awareness of local air quality by speaking to individuals and providing promotional materials. • Take part in air quality activities and events, where appropriate. <p>KPIs include:</p> <ul style="list-style-type: none"> • Lewisham Mayor’s Air Quality Champion will continue working with the School Air Quality Champions in collaboration with the working group, providing material and offering support and training as appropriate. • We will keep record of air quality champions recruited and report on actions carried out throughout the year. 	<p>similar resources as a way to reduce exposure to air pollution.</p> <ul style="list-style-type: none"> • Promote awareness of Sustainable transport alternatives. • Periodically report in writing or email on the activities undertaken as part of the programme. 	<p>3. Lower costs, subsidise/reward and better educate</p>	
Public health and awareness raising	11	<p>Engagement with businesses/Public Health Teams will be supporting engagement with local stakeholders (businesses, schools, community groups and healthcare providers).</p> <p>The support will be via the DsPHs when projects are being</p>	Public health /EP	<p>We will continue to use several readily available resources (e.g. GLA pollution alerts, airText and Imperial College London Air webpage) to raise awareness about the health impacts of air quality, and monitor these health impacts more closely.</p> <ul style="list-style-type: none"> • Information and promotion packs to 	<p>We will :-</p> <ul style="list-style-type: none"> • Search for more funding for further School Superzone projects. • record the number of schools taking part in School Superzone project and reporting if funding becomes available 	No specific action on this measure	No action needed in the AQAP

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		developed.		<p>reduce emissions from business activities. Direct contact will be limited at first due to social distancing (if any at the time).</p> <ul style="list-style-type: none"> • Promotion via business engagement team • Continue to distribute leaflets at events and stands • Funding app message services such as the Lewisham App • Re-publicising the Mayor’s social media pollution alerts through the communication team and social media channels. 			
Public health and awareness raising	11.1	<p>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</p> <p>Strengthening coordination 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.</p> <p>Director of Public Health to sign off</p>	Public Health/Environmental Protection	<ul style="list-style-type: none"> • ASR Report reviews and update and • JSNA update – with appropriate air quality considerations. <p>KPIs include:</p> <p>Report back on projects to GLA through ASRs.</p> <ul style="list-style-type: none"> • Number of subscribers, Sign-ups to the app or similar alert systems in the borough • Engagement with vulnerable groups • Estimated reach of pollution alerts within the borough (via social media etc.) 	<ul style="list-style-type: none"> • Health and Wellbeing Strategy delivery plan will be reviewed for 2018 – 2020 to incorporate air quality. <p>Appointing one Consultant grade is part of the health protection remit.</p> <p>The ASR and AQAP Will be signed off at Health Protection Committee.</p>	No specific action on this measure.	No action needed in the AQAP

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		Statutory Annual Status Reports and all new Air Quality Action Plans		<p>JSNA to be reviewed and updated by end 2021.</p> <ul style="list-style-type: none"> Minutes of AQ working Group. Public Health chair the AQ working Group. At least one PH specialist has air quality in their objectives <p>The Job specification of at least one specialist to comply with requirement and actions included in work plan i.e. Health in all policy portfolio.</p> <ul style="list-style-type: none"> Signed AQAP and ASRs as of when completed through Health Protection Committee 			
Public health and awareness raising	11.2	Engagement with businesses – Delivery and Servicing Plans (DSP) delivered through Planning process	EP/ Public Health/ Transport/ Planning	<p>Successful implementation of Cleaner Air Villages (CAVs) projects and reporting back to the funders and all relevant parties by due date.</p> <p>KPIs are as identified in each project description.</p> <p>Number of applications for the discharge of the DSP condition approved.</p>	<p>Report back on future projects to the funders (DEFRA/GLA).</p> <p>Lewisham is part of the CAV4 to be implemented from 2022-2024.</p>	<ol style="list-style-type: none"> All 'incentives' are pointless when nothing is being done regarding excessive amounts of HGV lorry's and other vehicles from out of borough, Kent and the A20 driven through the borough (Brownhill road & South-circular) on a daily basis. There is also no mention of cargo bikes, which are a solution to 'last mile' deliveries. Use of these delivery vehicles benefits from improved cycling infrastructure. There need to be more specifics about getting people out of cars for short local journeys. There is also no mention of cargo bikes, which are a solution to 'last mile' deliveries. Use of these delivery vehicles benefits from improved cycling infrastructure. Covid has brought a huge surge in online shopping and there are no plans to try to decrease delivery vans such as reinventing shopping areas or Amazon style lockers for say whole roads/blocks of flats to share to tackle single delivery issues Banning HGVs from LBL roads Final mile delivery collection points Find out at-risk groups and have a strategy to protect vulnerable workers who spend a lot of time on the road e.g. Bus drivers/delivery drivers. offer loans to business for electric delivery vehicles or cargo bikes" I would like to use my bike for small trips to the supermarket but it's too much trouble and hard work. The nearest bike lock ups are 	<p>Comments noted and forwarded to the relevant services. No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <ol style="list-style-type: none"> Lewisham supports the ULEZ and supports the expansion of the ULEZ to cover the entire Borough There have been cargo bike schemes in the Borough but last mile deliveries are something to consider as mentioned in 16. As above. Lewisham are promoting the switch to lower emission vehicles and reducing freight movements. As above. See answer 1 See answer 2 Not part of AQAP but could be picked up by Lewisham Financial incentives are not offered by Lewisham Cycle infrastructure it to be improved, including cycle hangars.

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						a bit too far away for me with my disability. I rely on a weekly van delivery instead but would like to reduce this.	
Public health and awareness raising	11.3	Raise awareness on the impact of indoor air quality on human health	Environment protection/Public Health	Compile and publicise information leaflet on indoor air quality improvement. KPIs include: Information pack compiled and made available on our webpage by end of 2021	We will raise awareness on Indoor air pollution in homes, workplace and other buildings.	<ol style="list-style-type: none"> 1. Grants to replace boilers; advice and guidance on indoor pollution and how to tackle it." 2. Offer a free indoor air quality assessment to all residents on an annual basis 3. "-negotiate bulk discounts indoor air quality professionals" 	Comment noted and already considered in the draft plan.
Public health and awareness raising	12	Supporting a direct alerts service such as Lewisham App or AirText, and promotion and dissemination of high pollution alert services	Environmental Protection/ Public health / Communication	<ul style="list-style-type: none"> • Information and promotion packs. • Promote via Public Health, schools and business engagement. • Disseminate leaflets to Pharmacies – via Healthy Living Pharmacy. • Continue to distribute leaflets at events and stands. • Funding the app message service. • Re-publicising the Mayor's social media pollution alerts through communications and social media channels. 	The Healthy Living Pharmacy (HLP) framework is aimed at achieving consistent provision of a broad range of health promotion interventions through community pharmacies to meet local need, improving the health and wellbeing of the local population and helping to reduce health inequalities.	<ol style="list-style-type: none"> 1. I think more education is needed 2. Education and showing a benefit of the changes; more green spaces and encourage community involvement in the spaces maintenance and care; 3. Lower costs, subsidise/reward and better educate 4. Those who are already interested in checking air quality alerts, or have signed up to a community-focussed app (airtext?) have already taken steps towards making changes. 	Comment noted and already considered in the draft plan
Public health and awareness raising	12.1	Engaging with communities through the work of the Borough of Culture 2022 ²⁵ (BoC) and monitoring number of bids for: a call to action on climate change/working together to deliver change.	Public Health	As required by the bid. KPIs include: Report back on projects to GLA through ASRs". Report and increase on number of people signed up to Lewisham Air App.	This work was deferred to 2022 due to Covid-19	No specific action on this measure.	No action needed in the AQAP.

²⁵ <https://www.london.gov.uk/what-we-do/arts-and-culture/current-culture-projects/london-borough-culture/london-borough-culture-winners-2022-and-2023>

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				<ul style="list-style-type: none"> • Sign-ups to in the borough. • Engagement with vulnerable groups. • Estimated reach of pollution alerts within the borough (via social media etc.) • Reduction in hospital admissions. 			
Public health and awareness raising (School)	13	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	Transport/ Public Health	<ul style="list-style-type: none"> • Continue to promote the Schools STARS scheme. • Create activities to promote a sustainable and safe approach to travel. • Work with school to encourage schools to engage with the STARS scheme and gain accreditation. <p>KPIs:</p> <ul style="list-style-type: none"> • Accredite at least 2 schools per year • Increase the number of school travel plans to with Gold and Silver Status in Lewisham • Monitor measures identified by the School Action Plan. 	<p>Complete and adopt our School air quality Action Plan.</p> <p>We currently have 19 Gold accredited schools across the borough. We will enable some schools to share their good news stories and activities - via the STARS website.</p>	No specific action on this measure	No action needed in the AQAP
Public health and awareness raising (schools)	14	<p>Complete and adopt the draft LBL Air Quality School Action Plan</p> <p>School specific actions are included in the draft LBL action plan.</p>	EP/all	Complete the LBL school action plan that will be used to monitor progress of measures implemented across the schools located in Lewisham and adopt by December 2021.	All schools will be offered Bikeability ²⁶ training for, children and young people who live in the borough. Balance bike and/or Scooter training is an annual offer to schools	<ol style="list-style-type: none"> 1. "Our school is situated right next to Lewisham Centre which is used as a cut through for people driving to the centre. It makes things very dangerous for the children of our school and we can see very little being done about it." 2. "Nowhere do you say other than schools the criteria you will use for selecting where the new monitors will go. 3. I ask the Council to prioritise this corridor for the benefit of its 500+ residents. The corridor is over 1 Kilometre long and is crossed daily by countless families and children on their way to 	<p>The comments made will be considered and actioned in the redesign of the School Air Quality action plan.</p> <p>No changes to the draft AQAP.</p>

²⁶ <https://lewisham.gov.uk/myservices/roads-and-transport/cycling/free-cycle-lessons>

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				<p>Specific school actions to be started by end 2021 include:</p> <ul style="list-style-type: none"> • Encouraging schools to compile an in house Action Plan using prescribed GLA Helpdesk Toolkit and advice. • Air Quality Monitoring in/around schools. • Feasibility of further School Superzone project. • Idling Action Events and workshop on air quality • Carry out other air quality audits around schools in Lewisham where nitrogen dioxide concentrations are the highest (in accordance with the GLA audit toolkit). • School Streets, temporary road closures and restrictions for parking with more than two per year to increase the current 26 school streets (plus 7 planned in 2021). • Greening around schools: • School Streets and restrictions for parking: • Carry out a feasibility study for the creation of a fleet of electric 	for their lower school pupils.	<p>school and nursery. At present there is only one crossing where pedestrians have right of way over cars."</p> <ol style="list-style-type: none"> I also hear about lots of parents who drive their kids to school. I think children, once they reach an appropriate age, should feel safe to walk or cycle to school, and this should be encouraged by the Lewisham council, and appropriate infrastructure should be built. Most journeys to school by car are under 2 miles, and it's an almost daily thing. Stop moving all traffic on to main roads, people live on these roads and many schools and widely used amenities are on main roads. There needs to be a rapid expansion of air quality monitoring to ensure equitable coverage across the borough, ensuring that every nursery and school has a dedicated monitoring device outside. I missed where 'school superfine' is clearly defined. "It's good to focus on air pollution around schools but I would like to see it monitored/ addressed more around health care settings such as hospitals/ hospice/ homeless hostels/ care homes etc. "You need targeted pro-active enforcement at schools and other hot-spots. "Given that air pollution is killing people, the measures in the proposed plan seem like too little too late. We don't allow people to smoke in workplaces (certainly not schools or nurseries), but there's a sense that it's fine to drive wherever you like, to idle with the engine running, despite the fact that these are really selfish and anti-social behaviours. Well done on the excellent School Streets programme. Produce a more detailed Strategy for mitigation for schools on main roads unable to join school streets programme (money for air filters/green screens) Organise "Walking bus" groups for school travel. Think that council should have been tougher on schools such as St Philip Neri when there new-build appeared to disregard the pollution children would be exposed to by having main entrance on busy road. They also removed a screen of trees which would have offset some of the pollution." More notices at schools and nurseries to tell people they will be fined for leaving their car idling I have already taken steps towards making changes. I am in frequent contact with people who are completely uninterested in improving air quality (or other aspects of their local area), I don't know if this is through ignorance or disenfranchisement, but if you work out a way to engage this section of the population then you will surely see a shift in people's adoption of positive air quality practices. E.g. Frequent idling awareness/walk to school campaigns at the school gates. Identifying 'park and stride' options for schools 	

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				school vehicles for disable/vulnerable children		<p>(this would also work towards Lewisham’s drive to reduce obesity and increase activity in children).</p> <p>In this I would also include the work on School Streets. This is a good initiative wish I would wish to see rolled out to all schools - including considering naming and shaming, as a last resort, those that do not engage. Getting very many more getting parents and children to walk to school, especially primary school should be a feasible objective.</p> <p>"Please reconsider school streets running. That should all be closed at the same time.</p> <p>15. "It's good to see this air pollution plan being drawn up, and I welcome the great progress made with school streets.</p> <p>16. In addition, I would welcome information about how anti-idling measures will be enforced. I took part in the schools workshop at Coopers Lane, and regularly ask people to stop idling, but have seen little difference in the rates of idling. A traffic officer rotating around schools monitoring for idling would be very helpful. I have now submitted several instances of idling to the idling enforcement team but not had any feedback.</p> <p>17. Promote cycling and walking in schools.</p> <p>18. Lewisham council has reopened my road in The LTN causing higher traffic, speeding and size of vehicle (data by you confirms this). This is on a residential street with 2 schools The Major and staff has never responded, so to declare a climate and pollution emergency is a sick joke when you are activity poisoning residents and children by your actions. Shameful!</p> <p>19. As a school, the large infrastructure projects such as changing boilers or installing charging points would need to be funded by capital grants.</p> <p>20. A principle of all transport policy should be to protect pedestrians and residents from harm. Exposing pedestrians, residents and school children to high-levels of pollution is a known harm.</p> <p>21. Reintroduce lee LTN & LTNs across the borough especially on school streets and in the centre of Lewisham (high street).</p> <p>22. Make all primary schools have School streets with NO vehicles allowed on them during drop off/ pick up.</p>	
Delivery servicing and freight	15	Update local authority procurement policies to include a requirement for suppliers with large fleets to have attained	Procurement and Commercial Services	Contract managers will together monitor whether the social value stipulations may increase costs going forward.	We will consult and work with service users, communities and the supply market to improve the design and production of our works	No specific action on this measure. "	No action needed in the AQAP.

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		silver Fleet Operator Recognition Scheme (FORS) accreditation and incorporate the use of the Social Value tool kit for the delivery of additional economic, social and environmental benefits that can be created from the 4 objectives and associated KPIs.		<p>We will (1) raise awareness about sustainability during procurement buying events (online) to all vendor; (2) consider how what is proposed to be procured can improve the economic, social and environmental well-being of our communities; (3) work with communities and suppliers to identify any specific needs and how well-being can be improved through our procurement activities and (4) we will lead by example by routinely considering social value outcomes available from the procurement of goods, works and services and asset disposal in all contracts over £50,000, as well as at lower levels where specific opportunities exist.</p> <p>KPIs:</p> <p>A new Social Value policy at Lewisham was developed and adopted on the 6 February 2019 which covers these requirements and therefore will be included (where relevant) in each procurement under the relevant KPI for Social Value. The standardised templates</p>	and services contracts that have an impact on the community so that outcomes are delivered in the most efficient manner, including through innovative solutions. At all times, we will ensure that procurement requirements focusing on social value are relevant and proportionate, reflecting need and the nature of the supply market.		

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				<p>will also cross-refer to the policy;</p> <ul style="list-style-type: none"> •Publication of new procurement strategy to include pollution reduction measures by end of 2021; • Number of contracts with air quality requirements included; • We will report on a number of events • LBL council will use their procurement policy and purchasing power to influence and incentivise suppliers to use cleaner vehicles wherever possible and provide a report in due course. 			
Delivery servicing and freight	16	Reducing emissions from deliveries to local businesses and residents	Procurement Team	<ul style="list-style-type: none"> • Inclusion of Air Quality considerations in updated Procurement Strategy by end of 2021. • Rigorous vehicle standards included within procurement policies. • Number of contracts with air quality requirements included. <p>KPIs as:</p> <ul style="list-style-type: none"> • No. of businesses participating in projects or changing their fleet. • Progress on project <ul style="list-style-type: none"> - Number of residents engaged - Number of businesses engaged - Number of new charging infrastructure 	<ul style="list-style-type: none"> • Consider and completion of all Business Engagement Projects. • Promote the switch to lower emission vehicles, adopting smarter practices and reducing freight movements by better use of consolidated trips • Cleaner vehicles and consolidated deliveries, such as EV-only loading bays, ULEV only areas 	<p>See point 12 about education.</p> <ul style="list-style-type: none"> • Nothing to support helping residents to move to electric vehicles as you don't want cars. • To encourage electric vehicle adoption, the biggest issue will be how to charge cars at home when many properties do not have a driveway. Even if cables were laid across pavements, there is no guarantee that cars will be close enough to home for the cable to reach. The council is ideally placed to find a solution to charging vehicles parked on the street. • Making large electric/hybrid vehicles noisier would aid cycle safety as the ears are the best way of detecting vehicles approaching from behind, and allow some prediction of driver behaviour from changes in engine noise. • residential and commercial parking permits for vehicles other than hybrid/electric should be increased significantly to encourage changes in behaviour and car ownership, and to subsidise introduction of a more robust air quality monitoring network" • Promoting the use of electric vehicles is all very well, but unless the electricity is generated 100% renewably, pollution is still being created somewhere. People need to be using less energy overall (as the current energy crisis illustrates), so I'd 	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <p>A shift to electric vehicles is encouraged through the ongoing expansion of our electric vehicle charging network.</p> <p>The Low Emission Vehicle Charging Strategy aims to ensure that everyone in the borough is no further than 500m from an electric vehicle charge point.</p>

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				- Number of EV's installed		<p>like to see less emphasis on electric cars and more emphasis on using public transport.</p> <ul style="list-style-type: none"> Commitment to installing electric car charging points across the borough - this is key to getting people to switch to EVs Electric and other cargo bikes - other London boroughs are idling much more than Lewisham right now. Lewisham should commit in its strategy to learn from the best, in this any other areas - no need to re-invent the wheel best - so out council becomes a leader in its own right" <p>Provision of EV charging won't help with the thousands of cars commuting into Lewisham every day because it is one of the easiest and cheapest places in inner London for commuters to park. Borough wide CPZ coverage is critical to stop Lewisham being used as a giant free car park.</p>	
Delivery servicing and freight (Borough)	16.1	Feasibility study of borough-wide freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/ or encourage businesses to participate in these.	Transport/ Procurement and EP	Feasibility report with KPIs and targets to be compiled by the end of 2022.	<p>This action is pending the availability of appropriate funding.</p> <p>We will apply for future DEFRA funding to implement this measure.</p>	No comments made.	No change to the AQAP
Borough fleet actions	17	<p>Increasing the number of hydrogen, electric, hybrid, bio-methane and cleaner vehicles in the boroughs' fleet.</p> <p>Accelerate uptake of new Euro VI vehicles in borough fleet.</p>	Fleet (S.G.M Environment)	<ul style="list-style-type: none"> Review use of electric pool cars for staff use and procuring more vehicles by end 2021. Review Staff Travel Plan to include travel payments to incentivise use of cleaner vehicles and minimise mileage and investigate tax benefits of electric vehicles versus fossil fuelled vehicles – include salary sacrifice schemes for employees – by Mar 2022. <p>KPIs as:</p>	<ul style="list-style-type: none"> Publication of new procurement strategy to include pollution reduction measures by end of 2021. Incentivise providers of passenger transport to use electric/low emission vehicles through the procurement process – Mar 2022. 	<ul style="list-style-type: none"> It can LEAD BY EXAMPLE! Change your polluting diesel fleet to fully electric! Get staff to cycle or walk - remove council parking at council buildings etc. .Upgrade its entire fleet of borough vehicles to electric only (this would have to go hand in hand with better EV charging infrastructure). Houses are set to become the biggest source of emissions in the borough and the council should start to set the tone, beginning with your own estate but also to new developments. 	No changes to the draft AQAP. Comments noted and already considered in the draft plan. Lewisham Fleet will be 100% compliant with ULEZ by 2025. The whole fleet will be zero emission by 2030.

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				<ul style="list-style-type: none"> Lead by example and increase the no. of ULEV in council owned fleet by 80% by 2022 <p>Report on the number of new Euro VI vehicles in borough fleet.</p> <p>Fleet will be 100% compliant with ULEZ by 2025.</p> <p>The whole fleet will be zero emission by 2030.</p>			
Borough fleet actions	17.1	Reducing emissions from Council fleets by Smarter Driver Training, or equivalent, for drivers of vehicles in borough fleet i.e. through training of fuel efficient driving and providing regular re-training of staff.	Fleet (S.G.M Environment)	<p>Training still on-going to meet legal requirements. This training is mandatory for vocational drivers (HGV and PSV) and is organised by the environment division not by personnel.</p> <p>KPIs include: Amount of training provided, and feedback given.</p>		No comments made.	No change to the AQAP
Localised solutions	18	Expanding and improving green Infrastructure across the borough and in localised areas with high level of pollution (e.g. around the south circular for example)	Parks & Regeneration/ Planning	<ul style="list-style-type: none"> Investigate options for green infrastructure in schools located in areas of higher pollution as part of the school action plan by Mar 2023. Assess the greening opportunities in pollution hotspots and Focus Areas and seek funding to deliver this, in addition to greening and improving clean air routes away from busy roads. 	<p>Whilst it can be hard to quantify air quality exposure improvements from such schemes it may be useful to consider such schemes as part of the Healthy Street Approach or to look at the measures of success built into Green Infrastructure proposals.</p> <p>We will use the GLA 2019 guideline document "<i>Using green infrastructure to protect</i></p>	Most comment relate to increasing green Infrastructure around schools, areas of high level of pollution on major route... etc.	No action needed in the plan because this was already under consideration.

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				<p>KPIs include:</p> <ul style="list-style-type: none"> No. of Green Infrastructure projects implemented by the council No. of trees planted. Adoption of the new parks and green space strategy to be delivered by end of year 2021 and to include measures to address air pollution and improve air quality i.e. tree planting, promotion of walking and cycling. 	<p><i>people from air pollution” and other trial green technologies like CityTree benches/trees</i></p>		
Localised solutions	19	Low Emission Neighbourhoods (LENs) or/and Business Low Emission Neighbourhood (BLEN)	EP/Transport	<ul style="list-style-type: none"> Carry out feasibility study into the viability of a LEN/BLEN in one of Lewisham’s pollution hotspots Implementation of LEN/BLEN in Lewisham where funding identified. <p>KPIs include:</p> <ul style="list-style-type: none"> Quantifiable reduction in pollutant emissions in most of the borough LEN/BLEN s is anticipated. <p>A further indicator of success for other boroughs is development of outline ideas/plans.</p>	<p>LEN/BLEN in pollution hotspots. Table 1.1 presents some past and current projects undertaken on GLA focus areas.</p> <p>Area 133 (Brockley Road (B218) between Adelaide Avenue and Wickham Road will be considered for localised projects.</p>	<ul style="list-style-type: none"> There is not enough emphasis on inappropriate vehicles using narrow roads through and cut through. Keeping large trucks on the main a roads is vital to keep congestion on residential streets. Speed monitoring, speed enforcement, improved pedestrian crossing and creating roads that are more suited to pedestrians and cyclists needs more focus so that pedestrians can travel safely through residential areas including Brockley. The Council has made no effort to reopen Brockley Train station or increase the capacity of other overcrowded public transport services because it always just says this is TFL's responsibility." I would also like to see a strategy for increasing tree canopy coverage with more street trees across the borough (building on the work done by the Brockley Society for example). This has the added benefits of flood protection and lowering temperatures during heat waves. 	<p>Low Emission programmes will be considered pending the availability of the right level of funding.</p> <p>No changes to the draft AQAP.</p> <p>There are many mixed views on LTNs across the Borough, comments noted and already considered in the draft plan.</p> <p>Lewisham remains committed to the outcomes that LTNs aim to achieve, reducing the number of unnecessary car journeys and reducing through traffic from using local roads, and we will continue to explore how best to achieve them.</p> <p>Speed enforcement is undertaken by the Police.</p>
Localised solutions	19.1	Work with all the relevant organisations to improve air quality on strategic roads such as the South Circular and other major roads around.	GLA/TFL/Transport/EA	Ella Adoo-Kissi-Debrah, who lived near the South Circular Road in Lewisham, died in 2013 and Southwark Coroner's Court found that air pollution "made a material contribution" to her	Up to 75 other monitors will be deployed across the borough an around the south circular to increase understanding of air pollution. A Breathe London monitor was also installed at the	Some comment include the following. <ul style="list-style-type: none"> roads coming off the south circular are far too busy, side roads are congested with traffic seeing cars idling for some time due to congestion, the constant honking of horns to push traffic over the lights then adds to noise pollution, parked cars on Sydenham Rise creates even more traffic as 363 Bus cannot get through then creates more noise pollution with honking of the horns, cars and 	No changes to the draft AQAP. <p>Comments on points raised in Q4 & Q8: <u>South Circular improvements:</u> TfL is the highway authority for the South Circular. It may be useful to consider such schemes around the South Circular as part of the Healthy Streets Approach or to look at the</p>

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				<p>death. The following measures will be taken by LBL to comply with the Coroner's recommendations presented in the prevention of future deaths report²⁷.</p> <ul style="list-style-type: none"> One of the key areas of concern raised by the Coroner centres on the issue of a lack of public awareness about the health effects of air pollution, including low awareness of sources of information and action that could be taken to reduce personal exposure. It was recognised that, due to the scale of the challenge, this needs to be addressed by all levels of government. Lewisham Council to continue disseminating the Mayor's existing moderate and high pollution alerts as well as by supporting and promoting a direct alert service such as Lewisham App, AirText and GLA alerts. Lewisham Council to ensure information about air pollution and how to avoid exposure is provided to residents, especially those most vulnerable, via 	<p>vicinity of the South Circular in June 2021 and will be used to monitor emission in real time.</p> <p>The LBL AQ Working Group will oversee the implementation of the recommendations from the prevention of future deaths report following the inquest in 2020.</p> <p>The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration.</p>	<p>motor bikes speeding up and the down this road creates noise pollution"</p> <ul style="list-style-type: none"> Impact of traffic reduction measures on surrounding streets, particularly near the South Circular (which is often a traffic jam) "I live in Forest Hill and the pollution here is mainly from car passing through Forest Hill either directly around the South Circular but also the side roads are magnets for traffic and rat-running. The stretch of the South Circular by the Station between Perry Vale and Devonshire is effectively an intersection connecting 4 routes, however the road isn't laid out to deal with the 10000s of vehicles that use the stretch every day so there is always standing traffic waiting to turn in and out of these roads. You can often taste the pollution here. By introducing ulez to south circular you have made my Road Horncastle Road a rat run as it runs parallel and all vehicles large and small use it 24/7 now; can you please address this before someone gets run over The proposals contain an overall lack of ambition. Heavy traffic, rat running, parking on pavements etc. remain a constant threat to the health of borough residents. The South Circular, particularly on Catford Bridge, are horrendously congested and polluted. The area has high footfall due to the stations and accommodation but the pavements are narrow and very close to the busy road. I live on the South Circular (Honor Oak Park, SE23 3LH) and the traffic is choking. One simple fix has not been adopted. Many roads off the South Circular (e.g. Grierson Road) are blocked to traffic. This means anybody who wants to access that road can't just turn left, but has to drive in a circle (all on the South Circular) to access it. You are literally drawing all of the traffic onto the busy, choked up, main thoroughfare - if you opened the side roads (which have been blocked to traffic for at least ten years), there would be far less traffic idling on the main road emanating petrol and diesel fumes. This particular main artery into and out of London was never such a congestion problem until all the side roads were blocked pushing all (even local traffic) onto the South Circular. "Reduce HGV lorry's and vehicles travelling from out of borough, through Lewisham/South circular Work with TfL to improve cycle facilities and cycle safety along the length of the South Circular across the borough - at the moment it 	<p>measures of success built into Green Infrastructure proposals.</p> <p><u>Effects of the ULEZ:</u> The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration. Lewisham support the expansion of the ULEZ to cover the entire Borough.</p> <p><u>Work with TfL:</u> 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.</p>

²⁷ <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

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				local public health channels.		is very sporadic and this puts me off cycling more regularly along the South Circular, which forms the majority of my daily commute." - address the chronic traffic on the south circular"	
Cleaner transport: Policy	20.0	Ensuring that transport and Air Quality policies and projects are integrated. 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.	EP	Aim for effective communication between teams will be achieved by ensuring that (1) air quality risks are fully evaluated in all transport feasibility studies/ proposals and (2) that regular briefings to the Transport Team on local air quality issues and projects. KPIs include: Heads of Transport will sign off AQAPs/ASRs and review them annually. We make it a requirement for an air quality official to attend transport steering groups/forums, and vice versa.	We will ensure that there is effective communication between those managing air quality issues within the borough and those managing traffic and travel.	Communication between Lewisham and TfL and surrounding Boroughs is needed. Measuring Air Quality is good but appropriate measures are required to reduce air quality issues.	No changes to the draft AQAP. Communication with TfL and neighbouring Boroughs is a priority for Lewisham. There will be effective communication between those monitoring air quality and those managing traffic and travel.
Cleaner transport: Zoning	20.1	Lobbying/working with TfL on: Speed control measures on more Strategic TfL roads/ Low Emission Zones. E.g. lowering the legal speed limit to 20mph in built up residential areas.	TfL/GLA	Reduction of overall vehicle speed and driver fines in all Lewisham roads. General speed reduction and speed fine on all roads.		There should be a Borough wide 20mph speed limit. Enforcement of speed limits should increase. Reducing speed limits with reduce vehicle emissions. There should be more partnerships and collaboration.	No change to the AQAP. Comments noted and already considered in the draft plan. A borough-wide 20mph speed limit came into effect in September 2016, not including roads managed by TfL. Speed limit enforcement is undertaken by the Police, Lewisham will liaise with the Police to highlight areas of poor compliance. 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.
Cleaner transport: Programme	21	Discouraging unnecessary idling by taxis and other vehicles and carry out a Council wide anti-idling	Environmental Protection/ Transport Enforcement / Communication	Report back to GLA on review and outcome of campaign to discourage idling.	This anti-idling project involves 27 boroughs and will build on the previous MAQF idling project, continuing the	Greater communication is needed to discourage anti-idling. Idling should be enforced on all roads. Fines should be issues for idling vehicles. There needs to be repercussions for idling vehicles. LTNs have increased idling.	No changes to the draft AQAP. Comments noted and already considered in the draft plan. We will have Idling Action Events and workshops on air quality in schools. We are participating in the Pan London

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		<p>campaign discouraging unnecessary idling around all venerable receptors.</p> <p>Idling Action Events/workshops and enforcement around schools.</p>		<ul style="list-style-type: none"> Participate in the Pan London Anti-Idling Project to raise awareness and include enforcement. Reduce emissions from Taxis and other vehicles idling unnecessarily through raising awareness and taking enforcement actions. Continue training Enforcement Officers on car idling and how to issue parking fines. Advisory notes to be issued to drivers and enforcement officers to issue fines for idling offences. Where marketing campaigns are undertaken the effects of these could be tracked; the number of hospitals displaying anti-idling videos for example; and; Regular meetings and formal processes in place to ensure effective communications. <p>KPIs as:</p> <ul style="list-style-type: none"> 100% of complaints about idling followed up with enforcement visit Number of vehicles asked to stop idling Number of notices issued for vehicle idling and near schools Where marketing campaigns are undertaken the effects of these could 	<p>idling action volunteer events to engage the local community.</p> <p>In addition engaging and training for fleets (both borough and commercial); school assemblies and workshops to create anti idling banners; development and implementation of a wider communications/ advertising strategy to raise awareness and further increase outreach for the campaign; a research project investigating the impacts of idling and behaviour change; and enforcement work to be done by the boroughs.</p> <p>School specific KPIs include:</p> <p>Number of:</p> <ul style="list-style-type: none"> Idling Action Events, School Workshops, Business engaged and fleet trained. Advertising Campaign. Research Project output. Staff undertaking on-street enforcement 	<p>Congestion increases idling. Anti-idling campaigns will only be successful if there is legislation to support it.</p>	<p>Anti-Idling Project to raise awareness and include enforcement.</p> <p>Parking is carrying out enforcement on anti-idling via Civil Enforcement Officers (CEOs)</p>

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				be tracked; the number of hospitals/petrol stations displaying anti-idling videos for example. <ul style="list-style-type: none"> Monitoring along the lines of Idling Action Days will be considered. We will focus on enforcing idling on pollution hotspots and transport hubs and other vulnerable receptors for example. 			
Cleaner transport: Programme	21.1	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs.	Transport/ Planning	KPIs include: Proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs		Work with car clubs to increase the number of bays and electric/hybrid vehicles available. Lewisham should start a car club scheme. Mandate more parking for car clubs.	No changes to the draft AQAP. The Borough has several car club bays provided by Zipcar, but more emphasis from Lewisham could encourage electric vehicles in the car club.
Cleaner transport: Programme	21.2	Working with TFL to promote car scrappage schemes or other retrofit technologies.	Transport/TfL	Report yearly statistics of car resident/businesses who have participated in the scheme on a yearly basis. We will carry out more research of retrofit technologies and publish on our website. KPIs include: Increase in the number of cars scrapped/with retrofits with time.	The ULEZ expansion up to, but not including, the North and South Circular Roads comes into force on 25 October 2021. On Friday 16/07/2021, the Mayor announced an additional £5 million in funding for his scrappage schemes to help more low income and disabled Londoners switch to cleaner vehicles. More information and eligibility is available on the TfL website ²⁸ .	No comments	No changes to the draft AQAP.
Cleaner transport: Programme	22	Pedestrianisation: Temporary car free days and pedestrian Days (e.g. no vehicles on certain roads on a	Transport / Environmental Protection	<ul style="list-style-type: none"> We will increase the number of schools taking part in a school-managed play street and the number of community play streets. 		Schools not included in the School Streets should be named. Cameras should be installed at School Streets.	No changes to the draft AQAP. A LBL School specific action plan will be compiled and adopted in due course. The aim is to increase more School Streets, at least three more per year subject to the right level of funding.

²⁸ <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/car-and-motorcycle-scrappage-scheme>

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Category	ID						
		Sunday) and similar initiatives.		<ul style="list-style-type: none"> We will target approximately 10 school play streets and 30 public play streets to start with. We will also facilitate community car free days in September 2021 subject to resources. <p>KPIs include: Number of school street/plays streets and community event undertaken. We currently have 26 school streets with seven more due before the end of the year (we will aim to add at least three more per year).</p>			
Cleaner transport: Infrastructure	22.1	Pedestrianisation / Traffic calming measures/Road system redesign.	Transport /TfL	<p>Project specific outputs and targets to be agreed in due course.</p> <p>KPIs include:</p> <p>Count/scale of the infrastructures implemented.</p>	See action 14 for street closures around schools.	<p>Provisions should be made for elderly and people with disabilities. Pedestrian walking infrastructure needs to be improved. Pavement parking restricts people walking. People need to feel safe to walk. More road closures are required to prevent rat running. All road should be open and LTNs removed. Lewisham Town Centre should be pedestrianised.</p>	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <p>Environmental and Equality reports are produced before schemes are implemented, with the view to install measures that are not to the detriment of anyone. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. There are mixed views about LTNs and require statutory consultation, this allows residents to engage with measures that will be introduced on their roads. Lewisham committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them Lewisham Town Centre pedestrianisation is not being considered currently. Parking on pavements is an issue across the Borough and greater investigation is required.</p>
Cleaner transport: Infrastructure	22.2	Pedestrianisation/ Lee Green Low Traffic Neighbourhood (LTN)	Transport / Environmental protection	As part of the LTN, LBL has been developing and implementing a range of	Project specific outputs and targets to be agreed	<p>More LTNs should be implemented. All LTNs should be removed.</p>	No changes to the draft AQAP.

Action		Measure description	Responsibility	Outputs/Targets/Key Performance Indicators (KPIs) For info and to be deleted?	Further information For info and to be deleted?	Summary of Responses to the AQAP consultation Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues – Missed and Q8.What can Lewisham Council do to help you make these changes? -	Modifications carried out in the Drafts AQAP
Category	ID						
				<p>measures to help mitigate against some of the effects of the COVID-19 pandemic as well as for strategic benefits (e.g. safer streets, encouraging more walking/cycling/ public transport and improving air quality).</p> <p>KPIs:</p> <p>Improvement of the following metrics and ensuring no loss of benefits through continuing to assess impact on:</p> <ul style="list-style-type: none"> • Air quality data; • Traffic flow and speed data on Lewisham managed roads; • Bus journey times and traffic flow/ congestion levels on Transport for London (TfL) managed roads; and <p>Initial feedback from the project pages on Commonplace.</p>	<p>following public consultation.</p> <p>These interventions focused on ensuring the public have enough space to socially distance as well as improving safety for the higher volumes of pedestrians and cyclists during the lockdown period</p>	<p>The roads outside of the LTNs are impacted with more traffic and worse air quality. More should be done to reduce cars. Discourage car use.</p>	<p>There are mixed views on LTNs across the Borough, comments noted and already considered in the draft plan.</p> <p>The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. There are mixed views on LTNs and require statutory consultation, this allows residents to engage with measures that will be introduced on their roads. Lewisham are committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them. Impacts of LTNs are assessed, including air quality, traffic flow and speeds.</p>
Cleaner transport: Policy	23	<p>Using parking policy to reduce pollution emissions and adoption of low charges at existing parking meters for zero emission cars.</p> <p>There will be emissions based parking for Short Stay Parking and for motorcycles.</p>	Transport/ Parking Enforcement	<p>Report to GLA through ASRs.</p> <p>We will update the existing parking strategy to include air quality considerations.</p> <p>The surcharge proposed should encourage a shift to cleaner vehicles. By encouraging electric</p>	<p>It is hard to measure the emissions reduction from parking surcharges directly. However, it is expected that measures such as surcharges for diesel vehicles could lead to a drop in the overall number of higher polluting vehicles in London.</p>	<p>Comments broken down in the below.</p>	<p>No changes to the draft AQAP.</p>

Action		Measure description	Responsibility	Outputs/Targets/Key Performance Indicators (KPIs) For info and to be deleted?	Further information For info and to be deleted?	Summary of Responses to the AQAP consultation Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues – Missed and Q8. What can Lewisham Council do to help you make these changes? -	Modifications carried out in the Drafts AQAP
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				<p>vehicles, the borough is also promoting a solution.</p> <p>KPIs:</p> <ul style="list-style-type: none"> • Monitoring parking levels of most polluting vehicles. • Proportion of residential permits issued to both most polluting and cleanest vehicles. • Comparison of charges with other boroughs. • Achieving the 500m radius by the end of 2021. • Number of parking charges. 	The annual parking report provides data and breakdown of vehicle types against total permits issued.		
Cleaner transport: Traffic management	23.1	Emissions based parking for Short Stay Parking and for motorcycles.	Transport/ Parking Enforcement	<p>This proposal considers the particular adverse environmental and health impacts of fossil fuel emissions on short stay parking and proposes implementing an emission based parking regime similar to that for parking permits within Lewisham.</p> <p>More information on this measure is available via our website²⁹.</p>	<p>This is aimed at tackling air pollution by encouraging people to switch to less polluting models or more sustainable forms of transport.</p> <p>It will also bring all motorcycle parking charges in line with other vehicles, which have had emissions-based permits since last year.</p>	<p>Higher polluting vehicles should pay more to park in Lewisham Phase in charges for larger vehicles that emit the most particulate matter.</p> <p>Charge oversized vehicles more for parking.</p>	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <p>The new Parking Strategy include a proposed charge for emissions-based parking.</p>
Cleaner transport: Traffic management	23.2	Controlled Parking Zone Extension for Climate Change Emergency.	Transport/ Parking Enforcement	<p>Our target is to meet the challenge of the Climate change in Lewisham.</p> <p>KPIs include:</p> <p>Number of permits issued</p>	<p>Extending our CPZs borough wide would be a key tool as part of the Councils approach to tackling the Climate Emergency and reducing the impact of the car on</p>	<p>CPZs should be extended to cover more of the Borough. There should be more CPZs.</p>	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <p>Extending our CPZs borough wide would be a key tool as part of the Councils approach to tackling the Climate Emergency and reducing the impact of the car on the environment and health.</p>

²⁹ <https://councilmeetings.lewisham.gov.uk/mgAi.aspx?ID=26630>

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					the environment and health.		
Cleaner transport: Traffic management	23.4	Enhanced parking enforcement for Safer Lewisham and to improve walking and cycling.	Transport/ Parking Enforcement	We will provide a report of number of accidents that occur before and after the implementation of the traffic management measure and assess the effectiveness in increasing road safety and improve air quality. KPIs include: Number of accidents; Report on yearly enforcement actions taken.	More information about this is available on our website. Discouraging the use of car by parking enforcement should encourage walking and cycling and reduce vehicle emissions.	Vehicles parking on the pavement was raised by many respondents, they would like to see less pavement parking. Parking should be reduced to encourage more walking and cycling.	No changes to the draft AQAP. Comments have been referred to Lewisham Parking Department. Parking on pavements is an issue through the Borough and greater investigation is required. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all, this includes parking enforcement.
Cleaner transport: Infrastructure	24	Installation of Ultra-Low Emission Vehicle (ULEV) infrastructure. The installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV ³⁰). This action is not related to new development	Planning/ Parking/ Transport	KPIs include: Number of charging points installed per year including (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations). We current have more than 100 charge points (a combination of 50kw, 7kw and 5kw points) ³¹ .	The number of new charging points will depend on planning obligations. We will aim to install at least five per year. Via the planning process, we will recommend, one Electric Vehicle charging point per dwelling with dedicated parking or one charging point per 10 spaces (unallocated parking) for all new residential developments. For commercial development, 10% of parking spaces to be	Residents would like an increase in ULEV infrastructure and subsidies for installing charging points at home and across the Borough. There is too much reliance on EV, more emphasis should be put on walking and cycling	No changes to the draft AQAP. Comments noted and already considered in the draft plan. No subsidies for charging points considered at this time. We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location. We will work with partners, i.e., Blue Point and TfL to continue increasing the number of electric vehicle charging points accessible to residents and businesses within the borough. We will build on the work already undertaken in relation to encouraging cycling and walking, this is a key element for Lewisham.

³⁰ Office for Low Emission Vehicles (OLEV)

³¹ <https://lewisham.gov.uk/myservices/roads-and-transport/sustainable-transport/our-long-term-strategy-for-low-emission-vehicles>

Action		Measure description	Responsibility	Outputs/Targets/Key Performance Indicators (KPIs) For info and to be deleted?	Further information For info and to be deleted?	Summary of Responses to the AQAP consultation Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues – Missed and Q8.What can Lewisham Council do to help you make these changes? -	Modifications carried out in the Drafts AQAP
Category	ID						
					provided with Electric Vehicle charge points.		
Cleaner transport: Programme	24.1	Continue campaigns to promote the use of electric charge points within the borough.	Parking/ Transport/ Environmental Protection/ Communication s	KPIs include: <ul style="list-style-type: none"> Monitoring proportion of electric vehicles registered by residents in the borough. Monitoring proportion of lampposts or equivalent infrastructure which have been modified to enable EV charging and the number of rapid chargers installed Monitoring the usage of existing EV charges from the CPs. 		Comments raised regarding how EV charging is in different types of properties, including blocks of flats	<p>No changes to the draft AQAP.</p> <p>Residents can be referred to Lewisham EV website for information.</p> <p>We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location.</p>
Cleaner transport: Infrastructure	25	Provision of infrastructure to support walking and cycling	Transport/ Planning	<p>Targets as presented in the cycling strategy.</p> <p>Reported to TfL through a LiP yearly report.</p> <p>KPIs:</p> <p>Targets ³²as presented in the cycling strategy and the LiP yearly report. Current target are as follow.</p> <p>With the base year (2017) and target year (2021): Daily cycle journeys is 183911 for base and 370002 for 2021, Cycling to work is 4.0% for base and 3 10.0% for 2021,</p>	<p>It is difficult to quantify with certainty the reduction in emissions as this depends on many other factors.</p> <p>The cycling strategy looks at where cycling in the London Borough of Lewisham (Lewisham) is at and where it aspires to take it in the near future.</p>	This highest percentage of comments were to increase walking and cycling infrastructure across the Borough.	<p>No changes to the draft AQAP.</p> <p>Details of each scheme for walking and cycling infrastructure is not fully included in the AQAP. The transport strategy and the cycling strategy will include detail of infrastructure across the Borough.</p>

³² <https://councilmeetings.lewisham.gov.uk/documents/s51611/05%20Lewisham%20Cycle%20Strategy%202017%20Summary%20200717.pdf>

Action		Measure description	Responsibility	Outputs/Targets/Key Performance Indicators (KPIs) For info and to be deleted?	Further information For info and to be deleted?	Summary of Responses to the AQAP consultation Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues – Missed and Q8.What can Lewisham Council do to help you make these changes? -	Modifications carried out in the Drafts AQAP
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				Casualty rate is 2.25 for base and 1.16 for 2021 and Cycling to school is 3.2% for base and 7 4.8% for 2021.			
Cleaner transport: Policy	25.1	Update of Cycling Strategy and policies for the borough.	Transport	The strategy was developed in 2016/17 and published in 2018. An update will be undertaken by end 2022. The updated cycling strategy will include updated KPIs.		Reference should be made to LTN1/20 which is the new cycling guidance	No changes to the draft AQAP. New Cycling Strategy to include a reference to LTN1/20 and other standards, guidance and best practice as appropriate
Cleaner transport: Infrastructure	25.2	Increasing cycle parking on street and in new developments in line with London Plan Standards.	Planning/ Transport	194 Sheffield stands to be installed in 2021 at key train stations and town centres. Internal reporting and LiP yearly reporting on increase in parking/bike hangars installed across the borough, with at least one hangar in every ward. KIPs include: Provide statistics on the number of cycling parking/stands across the borough.	We currently have 110 bike hangars in the borough - equivalent to 660 individual spaces.	Increasing cycle parking facilities across the Borough. Cycle parking to include spaces for cargo bikes.	Modification to the AQAP – Cargo cycle parking to be implemented a part of the Clean Air Villages 4 (CAV4) ³³ project. There is a commitment in the AQAP to install at least one hangar per ward every year. A total of 26 new cycle hangars are to be installed in the near future. Cargo cycle parking should be researched further but not required in the AQAP.
Other	26	General	Various	To be determined in service specific strategies.		Other general comments were as follows. 1. Recycle our waste instead of burning it and encourage green transport options for all. Don't penalize those who own cars - instead those who enter the borough. 2. Clean the street and improve waste collection across the borough 3. "Provide advice on energy-efficient boilers and provide grants to incentivise residents to upgrade old/inefficient appliances.	The comments made have been forwarded to the relevant services for consideration in their specific strategies.

³³ <https://crossriverpartnership.org/projects/clean-air-villages-4/>

Action		Measure description	Responsibility	Outputs/Targets/Key Performance Indicators (KPIs) For info and to be deleted?	Further information For info and to be deleted?	Summary of Responses to the AQAP consultation Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues – Missed and Q8.What can Lewisham Council do to help you make these changes? -	Modifications carried out in the Drafts AQAP
Category	ID						
						4. Lewisham Council has allowed the management company of multiple blocks to continue installing gas boilers in council owned properties. What a waste of money and lack of forward thinking."	

Appendix A Air Quality Action Plan Communication Plan and questionnaire

A1 COMMUNICATION PLAN

The following communication plan was produced by our communication team prior to external consultation.

Campaign objectives

- Lewisham Council is producing a new Air Quality Action Plan which will outline its policies and ambitions to improve air quality in the borough over the next five years.
- The Council has a statutory duty to engage and consult with residents and local businesses on its action plan
- Over and above that statutory duty, we want to reach out and get the views of as many local people as we can.
- Engaging with residents and businesses about our plan is a core part of the AQAP and is necessary for it to involve local people and, with their support, succeed.
- The AQAP is a core part of the Council's ambitious plans to be carbon neutral by 2030, as laid out in Lewisham's Climate Emergency Action Plan.

Audience insight

- The consultation is aimed at the wider population of Lewisham, as well as local businesses, organisations, stakeholder groups, voluntary groups, environmental groups and activists and health professionals
- Knowledge and concerns about air quality have increased in recent years as the environment and worries about climate change have moved to the front of people's political and social agendas.
- This is a positive move as the public needs to support the changes needed to be made by governments, other administrations, businesses and individuals to stop the damage to our climate.
- On air quality, people now have a greater understanding of how this issue affects all our lives, especially those most vulnerable, and that ignoring this issue is no longer an option.

Strategy

- The Council has produced a comprehensive draft AQAP for 2021 -2026. This will replace the current five year AQAP, which covers the period up to 2021

- The new action plan outlines what improvements have been made over past five years and details what further actions the Council and its partners like the GLA plan for the coming years.
- A condensed version of the document and its contents, coupled with a questionnaire will be produced as the front facing document of the consultation.
- The condensed document is designed to be more accessible to ordinary people, to focus on the key elements of the AQAP and provide readers with a simple and accessible way of giving us their input.
- Both documents will be available online with the option of print copies for those with no or limited internet access.

Implementation

- Create online page for consultation on AQAP
- Print up supporting copies of consultation and make available at libraries and care homes (suggest print run of 250 copies)
- Press release to local newspapers, with follow up calls to key journalists to encourage coverage.
- Use resident e-newsletter to spread message (readership 35,000): this can be used more than once during six week lifetime of consultation
- Use other e-newsletter, council blogs to encourage residents, businesses, etc.
- Use staff e-newsletter to engage with council workers (also Intranet/Yammer)
- Posters up in libraries to support take up
- Social media posts across Facebook, Instagram, Twitter, etc., across life of six week campaign
- Specially adapted e-newsletters focused at and sent to key stakeholders and groups
- Encourage stakeholder groups, such as schools, health faculties, etc., to take up the consultation message and cascade use on their own media channels
- Use internal communications to inform cllrs directly
- Article in Lewisham Life magazine (depending on LL publication date)
- Reach out to local bloggers
- Cascade via Safer Neighbourhood Team Panels
- Engage with eco-groups in borough
- Mumsnet Lewisham or local mothers' group
- Local voluntary organisations using Lewisham Local
- Make posters available for care homes, churches, community centres, youth groups, crèche centres, etc..
- Cascade via CCG to health services

- Liaise with Lewisham Homes to get message out to tenants using their print, email and online channels

Audiences

- All LBL staff
- All residents and workers/visitors
- Local MPs and Council Members
- Environment Agency and DEFRA
- All neighbouring local authorities
- Local nurseries, primary schools, secondary schools, colleges and universities
- Hospitals, pharmacies all health professionals
- South London Cluster Group
- Local businesses
- Chamber of Commerce and Enterprise
- Community groups
- Volunteering organisations
- Charities
- Environmental groups and churches
- Family and parent groups
- Youth clubs

Evaluation

inputs	Outputs	Outtakes	Outcomes	Organisational Impact
Social media and press coverage of consultation	No. of articles or broadcasts or sharing of SM	Awareness of issues	Advocacy by third parties	Uptake of consultation
Publishing and publicising online consultation	No. of residents and business owners filling in consultation	Increased awareness of AQAP 2021/26	Greater engagement of public	Enhanced mandate of the council's AQAP going forward

Publicising and providing hard copies of consultation	No. of hard to reach residents	Ensuring that LBL is opening consultation to as many local people/ businesses as possible	Greater engagement	Increasing council's mandate to tackle AQ on behalf of our residents
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Timeline

Timing	General activity: key milestones
September/ October	AQAP consultation launches Wednesday 1 September 2021 AQAP Team will bring process of compiling responses
	AQAP consultation closes Wednesday to 6 October 2021 AQAP Team will complete incorporating responses into AP
March 2022	Action plan put to the Mayor of London for approval
March 2022	Seek Cabinet approval of final plan

A2. QUESTIONNAIRE/SURVEY QUESTIONS

Q1 Are you completing this questionnaire as:

- a resident
- a business owner
- on behalf of a business/organisation/institution/community group/authority
- regular visitor to Lewisham
- worker in Lewisham
- a political representative
- other, please specify:

Q2 the four key priority areas within the Air Quality Action Plan are:

- Communications and raising public health awareness
- Minimising emissions from new developments and buildings
- Expanding the Council's Sustainable Transport Infrastructure
- Collaboration with the GLA and other London Boroughs on Air Quality initiatives to reduce pollution across the borough

There are seven additional priority actions within the plan.

Please indicate which of these you think should be the highest priority for Lewisham Council? Seven is 'lowest priority' and one is 'highest priority'

- a) Reducing pollution in and around schools and extending school audits to other schools in polluted areas

Highest priority					Lowest priority	
1	2	3	4	5	6	7

- b) Improving walking and cycling infrastructure

1	2	3	4	5	6	7
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h) Changing behaviour and connecting with people through community engagement

1

2

3

4

5

Q4 Please tell us if you think there is anything we have missed or should consider in relation to the above Air Quality issues

Q5 Do you understand the personal contribution you can make to tackling poor air quality?

Yes No Not sure

If yes, please specify, otherwise please tell us what we can do to help you understand how you can contribute.

Q6 what lifestyle or behaviour changes would you be willing to make to improve poor air quality?

Please tick all that apply:

If you are responding as an individual

- Replace your current vehicle with an electric vehicle or other ultra-low emission alternatives
- Install an electric charging point at your property if possible
- Walk your child/children to school
- Use a bicycle or walk for local journeys or take the bus regularly for your journeys as much as possible
- Volunteer as a local Air Quality Champion or participate in an Anti-Idling Campaign
- Use a car club rather than purchasing/replacing your car
- Only burn dry, well-seasoned wood or smokeless fuel on your stove, open fire or barbeque
- Get your indoor air quality checked by a professional person and adopt the recommendations to reduce indoor pollution
- Replace your old boiler(s) with ultra-low emission boilers

- Improve your understanding about air pollution by visiting the Lewisham Council or other relevant websites regularly
- other, please specify:

Q7 If your response is on behalf of a business/organisation/ institution/community group

Please tick all that apply:

- Replace your current vehicle(s) with electric vehicle(s) or other ultra-low emission vehicle(s)
- Install an electric charging point for use by your staff or visitors
- Provide cycle infrastructure, such as storage for staff or visitors
- Provide incentives to help your staff reduce air emissions
- Design in-house travel plans for your staff and encourage staff to use public transport where possible
- Replace your old boiler(s) with ultra-low emission boilers
- Encourage the uptake of Euro 6/VI vehicles by staff
- Provide/encourage the use of electric pool cars/bikes
- Adopt an electric cargo bike trial for local deliveries and business trips, discourage personal collections and re-time deliveries to quieter periods
- Carry out an energy audit
- other, please specify:

Q8 what can Lewisham Council do to help you make these changes?

Q9 what is your name and address? (This question is optional). Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection Regulations (GDPR).

Q10 what is your email address? (This question

Equal Opportunities Monitoring

Q11. Why are we asking you for this information?

The following monitoring questions help us to be fair and inclusive in the work that we do. All of these questions are **optional** and you do not have to answer them.

The personal data that you do provide is used to help us understand who is sharing their views and influencing our decision-making, though your identity will remain anonymous.

This data is also used to ensure that nobody is discriminated against unlawfully in the provision of our functions and services.

Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection

Q12. What is your age?

Q13. What is your sex?

- | | |
|--|---------------------------------|
| <input type="checkbox"/> Male | <input type="checkbox"/> Female |
| <input type="checkbox"/> Prefer not to say | <input type="checkbox"/> Other |

Q14. What is your ethnicity?

Q15. Disability

These questions relate to disability. Disability is defined in the law as a physical or mental impairment which has a sustained and long-term adverse effect on a person's ability to carry out normal day to day activities. This includes health conditions such as HIV, cancer and multiple sclerosis.

Do you consider yourself to be a disabled person?

- | | | |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Prefer not to say |
|------------------------------|-----------------------------|--|

Do you have any access requirements?

- | | |
|------------------------------|-----------------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No |
|------------------------------|-----------------------------|

If yes, please describe

Question 16: What is your religious belief?

Question 17: How would you define your sexual orientation?

Question 18: Is your gender identity different from the gender you were assigned at birth?

Question 19: If you live in Lewisham, which w

Appendix B Summary of Detailed responses /Suggested actions (SEE EXCEL SHEET)

B1- Statutory response to the AQAP consultation

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
<p>Climate Action Lewisham</p> <p>05 October 2021</p>  <p>CONSULTATION LEWISHAM AQP_0311</p>	<p>MONITORING</p> <ul style="list-style-type: none"> Adopt the new lower WHO guidelines for Nox and PM2.5 issued on 22.9.21. Quote the most recent guidelines in the report and change the strategy accordingly. Treat 2020 AQM results as an anomaly due to the pandemic: for example NO2 rates declined at roadside by 25% from 45.3 to 34.0 between 2016-2019, rather than the quoted 43% from 45.3 – 23.5 between 2016-2020 which gives an overly optimistic picture. Lewisham monitoring currently complies with standards which involves looking at annual mean data. In addition to this, because risk to health is cumulative, Lewisham should also look closely at the daily highs and lows to give a more detailed picture to residents about actual exposure and times and when to avoid roads e.g. what is risk of exposure at rush hour/school pick up times when people are out and about. Share this data in strategy and reports. Consider partnering with Dustbox to undertake "citizen science" community science monitoring (University of Cambridge/Goldsmiths) to improve picture of PM 2.5. They have already undertaken monitoring in Forest Hill and Deptford/New Cross. https://dustbox-logbook.citizensense.net/ 	<ul style="list-style-type: none"> Bullet points 1 and 2 described in the response are already incorporated in our draft air quality action plan therefore, no further action will be considered. With reference to real time air quality monitoring, LBL real time monitoring data is already available via our website at https://lewisham.gov.uk/my services/environment/air-pollution/check-air-quality-levels. Residents can also sign up to air quality alerts and forecasts. Example of tools include airText and Lewisham Air at https://lewisham.gov.uk/my services/environment/air-pollution/download-our-air-quality-app. Defra's national Daily Air Quality Index (at https://uk-air.defra.gov.uk/air-pollution/daqi) provides air quality forecast for schools and other vulnerable receptors like care homes. The Greater London Authority (GLA) is also currently reviewing all air quality alert and forecasting tools. Recommendations to London boroughs will be made in due course. Consideration will be given to partnering with Dustbox as suggested. <p>Action in the AQAP: no further modifications needed regarding bullets points 1-3. We have included a statement about working in partnership with Dustbox in Table 4.1, Action 1 of the plan.</p>
	<p>TRANSPORT</p> <p>Work with TfL to ensure the provision of regular train services which have declined since the pandemic. If people have to wait double the time for trains (e.g. the Catford/Orpington Train & Victoria Loop Line) they will inevitably drive instead. This is devastating for people who do not drive and rely on these services.</p> <p>Prioritise rolling out clean buses on the busiest roads e.g. A2 and A205, A21.</p>	<p>TfL are responsible for London Overground services so Lewisham would need to liaise with TfL and other operators regarding the decline in regular train services. Lewisham are re-establishing the public transport liaison committee with a meeting held in January 2022. The issue of frequency and timetabling was raised and further work is being undertaken by operators as we emerge from the pandemic. However the financial impacts and reduced demand may mean that the operators are not keen to provide more services.</p> <p>The ULEZ means that buses need to adhere to low emissions, however this is under TfL remit. TfL's 9000 strong bus fleet meet or exceed the cleanest Euro VI emission standards.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	Assess how successful enforcement of idling has been since 2020.	<p>Lewisham will undertake Idling Action Events/workshops and enforcement around schools. Lewisham will report back to the GLA on review and outcome of the campaign to discourage idling.</p> <p>All parking enforcement team now wear hi-vis jackets with 'anti-idling' campaign icon daily. At the point of engine idling, CEOs will first approach motorists and ask to switch off the engine or move. If after 5 minutes of the observation period, the motorists do not comply, the CEO will enforce by issuing a PCN.</p>
	Consider council Tax reduction or a bonus or other financial incentives for households choosing to give up existing cars. This could be sponsored by car hire schemes or ULEZ income.	Given the financial climate, a Council Tax reduction of financial incentive is not something that Lewisham are looking at for now, however Lewisham recognise that road transport is the main source of air pollution in London. We need to encourage a change to walking, cycling and ultra-low emission vehicles (such as electric cars) as far as possible. Also TfL did offer an incentive related to ULEZ, but this has come to an end.
	Idling – Educate council staff and Lewisham homes drivers and public services staff such as police, who can be idling offenders.	<p>Lewisham will undertake Idling Action Events/workshops and enforcement around schools. In addition engaging and training for fleets (both borough and commercial); school assemblies and workshops to create anti-idling banners; development and implementation of a wider communications/advertising strategy to raise awareness and further increase outreach for the campaign; a research project investigating the impacts of idling and behaviour change.</p> <p>Public health has been working closely with the environmental protection team on anti-idling work with the pan-London project on anti-idling project being funded by the Mayor of London.</p>
	Roadworks- consolidate roadworks and make them more efficient to reduce standstill/idling traffic. Fine companies who do not complete work on time. Consider the effect on air quality when issuing work permits.	The Lewisham Permit Scheme allows Lewisham to coordinate works on the Highway, Lewisham are proactive in trying to have collaborative work between promoters to reduce overall disruption. The Permit Scheme also allows Lewisham to fine works promoters who overrun their allotted time period.
	ULEZ	
	Push for London Mayor to implement expansion of the ULEZ to outer London.	Lewisham supports the expansion of the ULEZ to outer London and to cover the entire Borough of Lewisham.

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	Be clear and transparent about where money raised from ULEZ is going.	Lewisham supports the ULEZ and has pushed for the expansion to cover all of Lewisham, but this is a TfL scheme and all money raised is collected and spent by TfL. TfL state that “TfL don't make a profit and we are committed to reducing our costs. Any money received from the ULEZ will be reinvested into improving the transport network, including cycle ways, buses and Tube, and helping to improve London's air quality”.
	Produce a strategy on how to reduce air pollution south of the A205 if monitoring demonstrates that the ULEZ leads to short or long term increases in that area.	It is too early to tell if the ULEZ has affected air pollution south of the A205, monitoring will dictate how Lewisham need to proceed and if there are any knock-on effects.
	Phase in charges for SUVs and larger vehicles which produce the most particulate matter	<p>Lewisham is meeting the current objectives for Particulate Matter (PM10) and is meeting all of the national objectives other than for Nitrogen Dioxide (NO2). For PM2.5 the legal objective is not as strict as the World Health Organisation (WHO) recommended guideline limit. In the London Environment Strategy, the Mayor has committed to meeting the WHO health-based guideline limits across London by 2030. LBL exceeds WHO guideline PM2.5 limits, and a key area of focus will be to meet this 2030 target.</p> <p>There are no plans for charges for SUVs and larger vehicles currently, other than the ULEZ which should help to deter the larger vehicles. Our emission based parking charges proposal³⁴ incorporate measures to address this issue.</p>
	Initiate other road user charges: price per journey.	The Congestion charge and ULEZ are the only road user charges in operation at the moment both of which are operated by TfL. Please refer to the TFI website ³⁵ for updates on new proposals.
SUVs (electric/euro 6/which meet ULEZ standards)		
	Don't let tyre break wear become the diesel scandal problem of the future.	Comment noted.
	<p>Run or contribute to a campaign with London Mayor to make SUVs an unfashionable choice in Lewisham/ London –“Car obesity”.</p> <p>Stop the sale of poor quality tyres</p>	<p>We are unaware of such a London Mayor campaign, but if there was one, then Lewisham would support this.</p> <p>Lewisham supports the Mayor's objective to work with European institutions, other European cities, and city networks to ensure that trans-boundary pollution affecting London is minimised and ensuring strong source control measures and</p>

³⁴ <https://lewisham.gov.uk/articles/news/emissions-based-parking-charges-aim-to-improve-air-quality>

³⁵ <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		regulations are adopted at EU level. Also real-world driving emissions testing, type-approval process arrangements, tyre and brake wear, and new emission standards (for example Euro 7).
WALKING AND CYCLING INFRASTRUCTURE		
	Prioritise walking and cycling over electrification as this is more important in reducing PM pollution because of the tyre break wear issue. Run a public awareness campaign on this as it is a little-known fact.	The following interventions have been welcomed within Lewisham: Encourage and promote the reduction of the number of trips made by road and encourage walking, cycling and public transport where possible, as laid out in the Mayor's Transport Strategy. Reducing car use is one of the best ways to cut emissions. Sustainable Travel Towns studies show that car driver distance could be reduced by five to seven per cent, which can provide large reductions in NOx/PM emissions.
	Publish a list of improvements required for cycling and walking infrastructure across the borough and put an action plan in place to implement them. Some planning has been on the table for a very long time with no progress.	A priority for Lewisham is improving walking and cycling infrastructure: we will build on the work already undertaken in relation to encouraging cycling and walking. Three quietway routes have been delivered apart from Southend Lane and the Waterlink Way Bridge, the programmes of which have now been paused until further notice due to the COVID-19 outbreak. Some elements of the Deptford Parks Liveable Neighbourhood have been delivered. However, some elements have had to be scaled back and the programme is now on hold until further notice due to the funding constraints resulting from the COVID-19 outbreak. Pedestrianisation of Prince Street and Scawen Road (outside Francis Drake School) have been installed as well as 4 x Copenhagen crossings on Crook Road, Avignon Road, Kezia Street and Etta Street.
	Enact more enforcement of existing 20mph zones; 20MPH on ALL Lewisham roads	Lewisham are lobbying/working with TfL on: Speed control measures on more Strategic TFL roads/ Low Emission Zones. E.g. lowering the legal speed limit to 20mph in built up residential areas. Speed limit enforcement is undertaken by the Police.
LTNS		

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	<p>Some LTN measures were retracted in 2020/21. As the council's main strategy to increase active transport, and improve walking infrastructure they should be reinstated and rolled out further. If there are no plans for more LTNS, CAL would like to know the Council's alternative strategy for reducing traffic, making the streets slower and safer and encouraging the switch to active travel?</p>	<p>Lewisham are committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them All information on LTNs can be found on the Lewisham website at https://lewisham.gov.uk/myservices/roads-and-transport/our-traffic-reduction-programme-healthy-neighbourhoods</p>
SCHOOLS, NURSERIES, CARE HOMES		
	<p>We are very pleased with the success of the excellent School Streets programme and heartily commend the Council on their leadership and successful implementation. It has improved the lives of countless families around the borough. We recommend that the Council:</p> <ul style="list-style-type: none"> • Produce a more detailed Strategy for mitigation for schools on main roads unable to join school streets programme (money for air filters/green screens). • In high areas of pollution, offer monitoring and mitigation advice for care homes and more Nurseries. • Organise "Walking bus" groups for school travel. 	<p>The suggestions made about monitoring are already being implemented. We are installing other 20 diffusions around vulnerable receptors across the borough including schools, nurseries, care homes and Lewisham Hospital.</p> <p>Please read in the previous responses related to transport interventions.</p>
GREENING		
	<ul style="list-style-type: none"> • Resolve bottlenecks for schemes like Street Trees for Living by funding and recruiting more Council Tree officers. • Undertake a council led (alongside the volunteer led) initiative to do more greening- this could be funded privately by crowdfunding/sponsorship from estates agents etc but undertaken by council to fast-track and support projects like parklets. The waste strategy, open for consultation until mid-October, has also highlighted parklets and planters as being a possible deterrent to fly tipping, and we gave two brief case studies of micro-community groups keen to implement parklets but who have blocks of resources, permission or organisation. 	<p>More resource would always be welcome to resolve bottlenecks by funding and recruiting more Council Tree Officers but this has to be balanced against the fact that the Council faces unprecedented budgetary pressures as a result of cuts and COVID.</p> <p>Green Scene have developed innovative partnerships with external organisations such as Street Trees for Living and with community groups to do more Greening and so existing resources go further. The Councils Greening fund that is now into its second phase is one such initiative that supports community projects on land managed by Greenscene. Greenscene will continue to seek further such opportunities and partnerships.</p>
DEVELOPMENTS		

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	<ul style="list-style-type: none"> • More robust regulations for developers to enforce not “encourage” change. E.g. Remove all car parking in new developments apart from electric/exemptions for disabled use. Ensure all developments are subject to air quality conditions, not “almost all”. 	<p>LBL is compiling the Local Plan that will incorporate all the suggestions made. All developments will have air quality conditions moving forward.</p>
	<p>INSULATION/BUILDING IMPROVEMENTS:</p> <p>We applaud Lewisham’s progress improving council buildings but more is needed for private residences. We suggest:</p> <ul style="list-style-type: none"> • A new scheme within Lewisham to inspire home owners to undertake improvements to their private residences. The last national scheme had very low uptake. There is general confusion about whether it is still available. • Produce A “How to” guide/one stop shop on your webpage for private homeowners- e.g publish average costs, endorse trusted providers in Lewisham. Make it easy for the people who can afford it to make improvements/ boiler switches. 	<p>Based on analysis of EPC data the cost of bringing Lewisham’s owner occupier housing stock up to the standard needed to meet the ambition to be net zero carbon is potentially in the region of £900m. This is significantly more than the estimates made by the consultants Aether as part of the trajectory study for Lewisham’s Climate Emergency Action Plan.</p> <p>The Council has access to a database of EPCs developed by Parity Projects Pathways tool https://parityprojects.com/services/pathways/ The tool has existing and modelled EPCs for 132,678 Lewisham properties. Ignoring entries where tenure cannot be reliably estimated 46% of the stock is owner occupier. Just over 1% of these properties have an EPC rating of B or above, the level needed in order to meet energy demand without carbon. Drawing on various industry estimates and the work of the Retrofit London project https://www.londoncouncils.gov.uk/our-key-themes/environment/climate-change/retrofit-london-housing-action-plan, the average cost per dwelling to get a London domestic property to EPC B is approximately £15,000. This is the basis for the £900m estimate above, e.g. the cost of investment needed across the borough’s owner occupier housing stock is 60,000x£15,000=£900,000,000.</p> <p>It is not possible nor would it be equitable to non-home owners for the public sector to meet this cost. Our role instead is to work collaboratively across the sector and with others at a regional and national level to find ways to redirect funding including expenditure by home owners to make this happen. One such partnership that the Council has been actively involved in seeking to do just this is the UK Cities Climate Commission https://cp.catapult.org.uk/project/uk-cities-climate-investment-commission/</p> <p>Through our fuel poverty advice service https://lewisham.gov.uk/myservices/environment/environment/energyefficiency/energy-efficiency-at-home/help-for-vulnerable-residents-to-stay-warm-and-healthy, the Council is supporting low income and vulnerable residents to access the Government’s Local Authority Delivery Funding that supports investment in retrofit and zero carbon heating in owner occupier and private rental sector properties. This funding can be up to £10,000 for an owner occupier property with no requirement to match fund. Qualification for the funding is based on a household income of less than £30,000 and properties below EPC C.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		<p>The Council's website includes practical information for residents about actions they can take to cut carbon emissions https://lewisham.gov.uk/myserives/environment/environment/energyefficiency/energy-efficiency-at-home/help-for-vulnerable-residents-to-stay-warm-and-healthy. The pages include links to other sources of expert advice on home energy efficiency and retrofit. However creating a comprehensive one stop shop is beyond the scope of current resources and there are in any case existing resources that will do this job. Lewisham Council is working with one such example Eco Furb https://www.ecofurb.com/ and we expect to do more promotion of this service over 2022.</p>
	<p>BURNING:</p> <ul style="list-style-type: none"> • Communicate Burning Restrictions better. • Enforce the ban better. 	<p>Table 4.1 category "Emissions from developments and buildings" Action 7 details the actions being considered by the council to deal with burning of materials. The measures include training Lewisham Council officers on enforcement of the new Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020. Suppliers and retailers of fuels identified as being in breach of the legislation (e.g. fuel incorrectly labelled, uncertified fuel) could be fined for selling unauthorised fuel. This could be either a £300 fixed penalty fine for each offence identified, or a more substantial fine issued by the courts depending on the severity of the offence.</p> <p>Our Environment Crime Team will enforce any issues related to burning waste. Planning enforcement officers will deal with burning of material on construction site. Construction Management Plan (CMP) conditions will be used to manage and enforce burning on construction site.</p>
	<p>FUNDING</p> <p>The problem with implementing all of these initiatives will be a lack of money, as stated in the summary plan. We suggest: Consider introducing voluntary environment contributions for businesses and residents to enable the council to start implementing more popular measures like greening, freeing up council money to be spent on less visible measures.</p>	<p>We totally agree that funding is needed for major interventions. However, we will take simple and cost effective actions like raising public awareness and carrying and promoting actions to induce behaviour change to improve air quality. We will also work with businesses to investigate other sources of funding.</p>
<p><u>Environment Agency (EA)</u> <u>5 October 2021</u></p>	<p>General comments.</p>	<p>The comments have been noted. LBL agree with the recommendations and messages detailed in the response. These are already incorporated in the report. Where not directly relevant to air quality, for example, waste management procedures, the suggestions made have been referred to the right department for incorporation in their service specific strategies.</p> <p>Action in the AQAP: no further modifications needed.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
 Lewisham 05.10.2021 AQ.pdf	<p>Continue to raise awareness with residents and businesses on the need to adapt to climate change e.g. impacts of longer drier summers on air quality and the need to adapt and promote urban greening in new development and retrofitting in existing developments</p>	<p>Lewisham declared a Climate Emergency in Feb 2019 and have a target to be Carbon Neutral by 2030. The Climate Emergency Action Plan has five sections to achieve carbon neutral are Leading by example, Sustainable Housing, Decarbonised Transport, Greener, Adaptive Lewisham, Inspiring, Learning and Lobbying.</p> <p>This can be found at https://lewisham.gov.uk/my services/Environment/making-the-borough-carbon-neutral-by-2030-climate-emergency-declaration, where residents and businesses can find all information regarding Lewisham and Climate Change.</p> <p>Lewisham will also assess the greening opportunities in pollution hotspots and Focus Areas and seek funding to deliver this, in addition to greening and improving clean air routes away from busy roads.</p>
	<p>Ensuring high environmental standards at waste management sites supported with modern infrastructure and high environmental standards to prevent pollution such as dust or mud and high standards of fire prevention measures.</p>	<p>The Lewisham Waste Management Strategy sets out the Councils six priorities to reduce waste, improve air quality, and protect the environment for future generations. The priorities are Leading the way forward, Shaping services to follow the waste hierarchy, Working together for an improved local environment, Using waste as a resource following the circular economy principles, Reducing carbon emissions, Decreasing energy waste and improving air quality, Adding social value.</p> <p>Lewisham is also part of the Pan London Non Road Mechanical Machinery (NRMM) project which aims to reduce emissions from construction sites. Almost all major planning applications are now subject to Non Road Mobile Machinery, air quality and dust conditions.</p>
	<p>Multi agency partnership working and joined up working and enforcement actions to secure high environmental standards and prevent any poor compliance with planning and permitting regimes.</p>	<p>Lewisham is part of the Cross River Partnership (CRP) coordinated series of Clean Air Villages (CAV) 29. This Defra funded project promotes air quality-related behaviour change from a wider community perspective, including residential and commercial transport and travel.</p> <p>Lewisham have 24 Environmental offences which require a fixed penalty if contravened, they can be found on the Lewisham website https://lewisham.gov.uk/my services/environment/enforcement-action</p>
	<p>The action plan should reference the need to manage Non Road Mobile Machinery (NRMM) across Lewisham e.g. bulldozers, forklifts, generators, mobile cranes, mobile crushers etc. Non-Road Mobile Machinery (NRMM) London City Hall</p>	<p>Lewisham is part of the Pan London Non Road Mechanical Machinery (NRMM) project which aims to reduce emissions from construction sites. Almost all major planning applications are now subject to Non Road Mobile Machinery, air quality and dust conditions.</p> <p>Lewisham is part of pan-London project MAQF NRMM Zone enforcement – to inspect construction sites in every borough, to ensure they are using the cleanest construction equipment. The Enforcement Team within Lewisham will increase the number of enforcement visits/actions.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		NRMM used in construction currently accounts for approximately seven per cent of NOx and eight per cent of PM10 emissions in London. Therefore, regular enforcement (education) ensures those operators who comply see the benefits in continuing to do so.
	Raise awareness with residents and businesses to report environmental incidents to our 24-hour incident hotline https://www.gov.uk/report-an-environmental-incident	Residents can raise Environmental incidents direct to Lewisham through the Lewisham website https://lewisham.gov.uk/organizations/environmental-services . However there is an opportunity to add the EA 24-hour incident hotline to the Lewisham website.
	Sharing information and evidence on air quality and agreeing joint actions to resolve air quality issues for businesses, landlords and all organisations involved.	Lewisham will work in partnership across the Council with neighbouring authorities, with partners such as the GLA, TfL and DEFRA, with community groups and volunteering organisation to effectively use the following local levers to tackle air quality issues within our control.
	Continue to raise awareness and encourage residents and businesses to sign up for air quality alerts and air quality forecasts https://uk-air.defra.gov.uk/	LBL will add the DEFRA information regarding residents and businesses signing up for air quality alerts and forecasts to the Lewisham website.
<p>Catford Active Travel</p> <p>27 September 2021</p>  <p>Catford Active Travel response to Lewisham</p>	We feel this report makes no mention of any measures to reduce traffic or to actively increase levels of walking and cycling in the borough and this is a hugely missed opportunity.	<p>Reducing car use is one of the best ways to cut emissions. Sustainable Travel Towns studies show that car driver distance could be reduced by five to seven per cent, which can provide large reductions in NOx/PM emissions.</p> <p>The Lewisham Transport Strategy and Local Implementation Plan, 2019 – 2041, sets out a range of policies and projects to achieve the transport objectives, which includes objectives relating to active travel, reducing the volume of traffic and levels of car ownership.</p> <p>The Cycle Strategy which feeds into the AQAP clearly prioritises a shift away from car use. It aims to increase cycling numbers from 600,000 to 1,500,000 by 2026.</p> <p>We will continue using our planning powers to enforce air quality measures, reduce emissions, increase energy efficiency and adoption of Planning Policy that is encouraging car-free developments.</p> <p>STARS project continues to be a priority in Lewisham. The school travel plan mode share will be monitored and comparative data from previous years will be made. Use will be made of TFL City Planning guides and routes with higher walking potential will be considered for additional work and focus.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	<p>We believe the council could do more to reduce car journeys on borough roads.</p>	<p>We agree with the comment on implementing measures to encourage active travel aims to reduce car journeys and encouraging a shift away from car ownership.</p> <p>The Lewisham Transport Strategy and Local Implementation Plan, 2019 – 2041, sets out a range of policies and projects to achieve the transport objectives, which includes objectives relating to active travel, reducing the volume of traffic and levels of car ownership.</p> <p>The Cycle Strategy which feeds into the AQAP clearly prioritises a shift away from car use. It aims to increase cycling numbers from 600,000 to 1,500,000 by 2026.</p>
	<p>We believe that given sufficient time, LTNs can lead to permanent behavioural change as residents see how journeys can be made quickly and safely on foot or by bike. We would like to see LTNs rolled out to every area of the borough so more residents can gain from the benefits that come from reduced vehicle traffic on their streets</p>	<p>The Healthy Neighbourhood Programme continues to be a key part of the Council's Transport Strategy and will be delivered, subject to funding. Lewisham committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them.</p> <p>All information on LTNs can be found on the Lewisham website at https://lewisham.gov.uk/myservices/roads-and-transport/our-traffic-reduction-programme-healthy-neighbourhoods.</p>
	<p>Unless people "feel safe walking and cycling into the town centre, people will choose to drive in.</p>	<p>Agree with comments. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Lewisham's corporate priority is to build safer communities, where every resident feels safe and secure living here as we work together towards a borough free from the fear of crime. One of LBL priorities³⁶ is making Lewisham greener. Everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.</p>

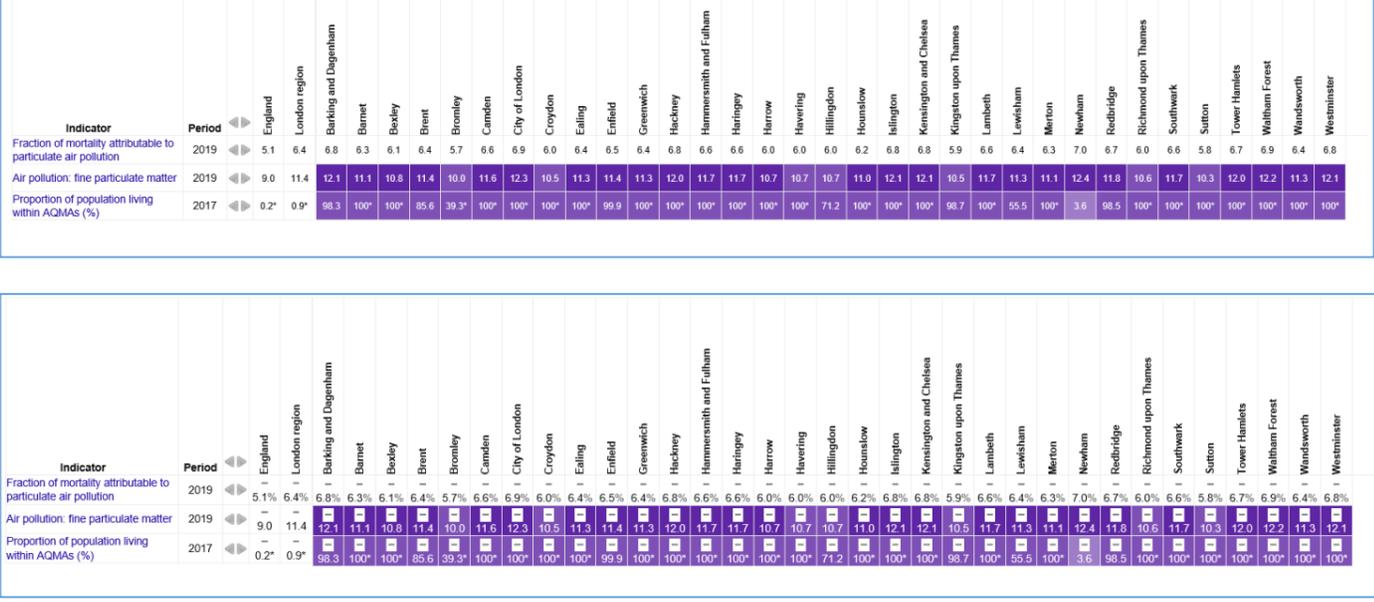
³⁶ <https://lewisham.gov.uk/mayorandcouncil/corporate-strategy/our-priorities>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		Lewisham was one of the London boroughs which implemented the School 'Superzone' pilot project ³⁷ to create a healthier and safer environment for children within 400m radius around schools to protect children's health.
	Non-drivers can feel like second class citizens as they try to make their way through the borough. Even our pavements are filled with cars, making walking challenging for anyone with children or with mobility issues.	CPZs are looking to improve the parking situation. Residents are encouraged to report parking issues to 020 8787 5397 or via email to LewishamParking@nslservices.co.uk Parking on pavements is an issue through the Borough and greater investigation is required.
	We want to see more space given over to walking and cycling, and for a network of safe, secure and continuous cycle lanes to encourage residents to leave their cars at home. We want to see the recent temporary scheme on the A21 upgraded into a permanent, segregated cycle lane and extended to meet up with Cycleway 4 in Deptford, thus providing Catford residents with a safe and separate way of cycling into central London.	Agree with comments. Walking and cycling is key to active travel and Lewisham is proactive in making walking and cycling safer for all. The Lewisham Transport Strategy and Local Implementation Plan, 2019 – 2041, sets out a range of policies and projects to achieve the transport objectives, which includes objectives relating to increasing active travel, reducing the volume of traffic and levels of car ownership. The Cycle Strategy feeds into the AQAP and states that "Liveable Neighbourhoods making spaces available for people to enjoy some parts of the streets without motor vehicles, particularly near schools, will help those on foot or on cycle and those that live on the streets". Lewisham is also implementing a range of other measures, such as school streets, across the Borough to provide more space for walking and cycling. The A21 is a scheme that is led by TfL, it is still currently in place under a temporary order and TfL are considering the next steps.
	We hope that the council will use cargo bikes as often as possible as these vehicles not only reduce pollution, but also they reduce congestion. A network of cycle routes as suggested above would also encourage local businesses to use cargo bikes for making local deliveries.	Lewisham do not currently use cargo bikes for Council business, but it is an opportunity to look into for the Council and the potential benefits it could bring. Lewisham have a plan for a number of cycle routes through the Borough, which is set out in the Cycling Strategy and Transport Strategy
	Simply replacing petrol and diesel vehicles with electric ones is no solution. An article published by Oxford University this summer estimates that even if all vehicles sold today were electric it would take 15 to 20 years to achieve full electrification.	It is recognised that not every journey can be made on foot or by bike, and where car use is necessary, a shift to electric vehicles is encouraged through the ongoing expansion of our charging network

³⁷ https://www.london.gov.uk/sites/default/files/superzones-_final.pdf

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	<p>Electric cars will do nothing to reduce the congestion that blights Catford town centre and makes it a less pleasant place to be or address road safety concern. Electric vehicles need charging points and these can often block pavements. They also release particles from brakes and tyres that cause pollution, and the extra weight of these vehicles will lead to more damage to road surfaces, thus making cycling less attractive as the road surface becomes uneven and broken. The lack of physical activity is also a growing concern.</p>	<p>We will locate electric vehicle charging points in a way that does not interfere with people walking or with disabled people. Lewisham follows the London's electric vehicle charge point installation guidance.</p>
	<p>In Catford Specifically:</p>	
	<p>Borough fleet actions: replace larger vehicles with (cargo) e-bikes when possible to reduce the motor traffic in the area.</p>	<p>Lewisham is not currently looking to replace larger fleet vehicles with cargo e-bikes, but it is an opportunity to look at for the Council. Lewisham cargo bike scheme introduced in 2020 for pharmacies delivery.</p>
	<p>Localised solutions: analyse the car parking space in use in CPZ areas and where possible reallocate parking space to trees and parklets.</p>	<p>CPZs are looking to improve the parking situation, so we encourage residents to request CPZs and each request will be investigated. All information on CPZs in the Borough can be found at https://lewisham.gov.uk/myservices/parking/permits/controlled-parking-zones-and-operating-times</p>
	<p>Work with TfL to bring forward the A21 healthy street and Catford Bridge cantilevered cycling bridge.</p>	<p>The A21 is a scheme that is led by TfL, it is still currently in place under a temporary order and TfL are considering the next steps.</p> <p>The Catford Bridge is a future aspirational project that is included in our Catford Town Centre Framework, designed to extend the width of Catford Road (over the bridge on the southern side of the road) to create a cantilever that could provide segregation for cyclists. The programme for implementation is currently unknown.</p>
	<p>Roll out Low Traffic Neighbourhoods along the A21 corridor (Rushey Green / Hither Green West).</p>	<p>Comment noted. We are considering the future programme of healthy neighbourhoods and are updating the metrics as stated in the Transport Strategy.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	Avoid installing chargers in the pavement and install them on parking bays as part of parklets / tree planting.	We will locate electric vehicle charging points in a way that does not interfere with people walking or with disabled people. Lewisham follows the London's electric vehicle charge point installation guidance.
	Install a cycle hub in the Catford stations area to enable multi-modal sustainable transport, leveraging the Waterlink Way route.	Lewisham is currently working on a proposal to undertake a combination of improvements to Public Realm between Catford and Catford Bridge stations, utilising S106 funds for this purpose. This project is one of a suite of Phase 1 projects to kick-start the full regeneration programme for Catford. The scheme does propose the incorporation of around 72 spaces for covered cycle parking provision with CCTV surveillance. We are currently nearing the end of RIBA stage 3 and are finalising details with stakeholders including TfL before we submit a Planning Application for the scheme which we aim to do in 2022.
	Set a target to reduce the cycle hangar waiting list (>2000 people at the moment). Prioritise areas where neighbours do not have space in their front garden to safely park their bikes.	There is a programme for the installation of more cycle hangars across the Borough. Internal reporting and LiP yearly report on increase in parking/110 bike hangars installed across the borough with at least one hangar in every ward. Sheffield stands are being installed in early 2022 (Aug 20 installation delayed due to COVID-19) at all stations in the borough to meet demand. 13 extra bike hangars added in 2020 equating to 78 new spaces.
	Make sure all traffic-light controlled junctions have a pedestrian phase ("green man") and all main roads have regular traffic light controlled pedestrian crossings.	TfL are the traffic signal authority. It is understood that the Mayor of London has made a commitment to ensure all traffic-light controlled junctions have a pedestrian phase, subject to funding. This is not a specific target for Lewisham, but is something that Lewisham would support, but would suggest it is linked to collisions and healthy neighbourhoods.
<p>Public Health England (PHE)</p> <p>21 September 2012</p>  <p>Public health England.pdf</p>	<p>As outlined in our 2019 review of interventions to improve outdoor air quality and health, we recommend that evaluation is embedded in the design of interventions from their outset and to systematically gather evidence of their impact and effectiveness</p> <p>You may find the public health air quality indicators for Lewisham useful in terms of strengthening the public health case for local action.</p>	<p>LBL is to work with other stakeholders to follow the recommendations outlined in PHE 2019 review of interventions to improve outdoor air quality and health published in 2020. LBL will also work with other stakeholders to embed evaluation in the design of interventions from their outset and to systematically gather evidence of their impact.</p> <p>A summary of public health air quality indicators for London authorities is shown below. For Lewisham, the values and trends of indicators are currently 6.4, 11.3 and 55.5% respectively for fraction of mortality attributed to particulate air pollution, fine particulate matter both for the year 2019 and proportion of population living within AQMAs (%) in 2017 respectively. This data will be incorporated in the final AQAP.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		 <p>The image contains two identical data tables. Each table has three main sections: 'Indicator', 'Period', and a list of London boroughs. The 'Indicator' section includes 'Fraction of mortality attributable to particulate air pollution', 'Air pollution: fine particulate matter', and 'Proportion of population living within AQMAs (%)'. The 'Period' section shows data for 2019 and 2017. The boroughs listed are: England, London region, Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Camden, City of London, Croydon, Ealing, Enfield, Greenwich, Hackney, Hammersmith and Fulham, Harrow, Havering, Hillingdon, Hounslow, Islington, Kensington and Chelsea, Kingston upon Thames, Lambeth, Lewisham, Merton, Newham, Redbridge, Richmond upon Thames, Southwark, Sutton, Tower Hamlets, Waltham Forest, Wandsworth, and Westminster. The data points are numerical values, some with asterisks indicating specific conditions.</p>
	Page 13 makes reference to the health costs of air pollution to the UK. Information on obtaining local authority cost estimates using the Air pollution: a tool to estimate healthcare costs is available here.	A tool to estimate healthcare costs provided will be used to estimate the health cost of air pollution and the AQAP updated accordingly.
	We welcome the wide range of departments involved in producing the AQAP. However, to further improve air quality and to support wider action to promote health and wellbeing, we would recommend engaging with your local Health and Wellbeing Boards (in conjunction with public health).	With reference to the comment made about engaging with your local authority Public Health Department to strengthen the public health case for local action on air quality within the AQAP, as detailed in Table 4.1, Category “Public health and awareness raising” Action 11, LBL Public Health department play a major part in all the actions taken by the borough to deal with air quality. For example, Action 1.1 - the director of Public Health have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population. The Director of Public Health signs off Statutory Annual Status Reports and all new Air Quality Action Plans and also chairs the Air quality working group meeting and the board meeting.
	We noted outdated information when referring to air pollutions role in health and inequalities; and would advise that you do a consistency check against the information contained in PHE’s edition of health matters. For example, since the Committee on the Medical Effects of Air Pollutants (COMEAP) 2010 report (referenced on page 12), the Committee has published revised estimates for mortality figures.	A consistency check has been made against the information contained in PHE’s edition of health matters at https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution#:~:text=matters-air-pollution-,Summary,leading%20to%20reduced%20life%20expectancy .

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		<p>With reference to Page 12: The revised estimates for mortality figures have been updated with the new publication³⁸ available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf</p> <p>All the information have been updated as necessary.</p> <p>As detailed in Table 1.4 Category “Emissions from developments and buildings”, Actions 8 to 9.1, we will use planning tools to ensure that all new developments are air quality neutral at the minimum and also integrate air quality in the design stage. Our Local plan will incorporate all the adopted mitigation needed to limit further deterioration of air quality across the borough.</p>
	<p>We would encourage working with key partners such as the Greater London Authority (GLA) to ensure that any new developments are designed and built, as far as possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality.</p> <p>The AQAP includes a number of awareness raising measures. We welcome their consideration and would recommend consultation with stakeholders to ensure cohesive messaging.</p>	<p>As stated above, LBL will work with all stakeholder to reduce air pollution across the borough.</p> <p>Action in the AQAP - we will review the information provided and incorporate in the final AQAP. Specific sections name “Borough Wide Interventions to deal with Air Pollution” and “Air Pollution and Inequalities in Lewisham” have been incorporated in section 1 of the AQAP to address the comments made by PHE.</p>
<p><u>Lewisham Cyclists 05 September 2021</u></p>	<p>We believe the order is incorrect as the council should enable active travel (walking and cycling) as first priority, followed by sustainable public transport, and then ultra-low emissions / electric vehicles last when other means of transportation are not available or feasible.</p>	<p>Reducing car use is one of the best ways to cut emissions. Sustainable Travel Towns studies show that car driver distance could be reduced by five to seven per cent, which can provide large reductions in NOx/PM emissions.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
 LC response to Lewisham Air Quality		Lewisham fully supports active travel; the reduction of emissions is a priority to achieve targets of carbon neutral by 2030. The reduction in emissions and active travel can actively help each other with road traffic changing to ultra-low emissions and the increase in cycling/walking infrastructure.
	<p>Where the Council chooses to support the uptake of ultra-low emission vehicles we believe that it should be focusing much more on the prioritisation of smaller shared-use low emission vehicles. There is a clear need to reduce the number of vehicles parked across the borough thereby releasing essential road space for wider pavements and improved cycling infrastructure.</p>	<p>Lewisham will update the existing parking strategy to include air quality considerations, this includes enhanced parking enforcement for Safer Lewisham and to improve walking and cycling and discouraging the use of cars by parking enforcement should encourage walking and cycling and reduce vehicle emissions.</p> <p>We are implementing a parking policy that will allow higher parking fees to be charged for vehicles that cause more pollution.</p>
	<p>We would like to highlight that charging points have recently been installed on Lewisham pavements in locations where ample carriageway space was available, reducing the amount of space for pedestrians, wheelchair users and others with limited mobility.</p>	<p>We review sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location, we introduce site feasibility criteria that will be considered and applied. This includes factors such as sufficient power distribution, minimum distances from specific utilities, and ensuring that adequate footway clearances are maintained. Ward Members and residents will be consulted on the locations prior to installation. Any 7kw or 50kw points will require planning consent.</p> <p>Information can be found at https://lewisham.gov.uk/my services/roads-and-transport/sustainable-transport/our-long-term-strategy-for-low-emission-vehicles</p>
	<p>We urge the council to adopt the updated 2021 World Health Organisation Air Quality guidelines as recently set out. We believe this is crucial in order for the council to meet a number of the stated aims as set out in both this draft plan and also the Council Climate Emergency Action Plan.</p>	<p>Lewisham Council will commit to identifying the WHO recommended levels alongside the current UK limits when publishing air quality data. Lewisham also follows the London Environment Strategy but refers to the WHO guidelines when publishing records. The Mayor's commitment is to meet the WHO targets by 2030 which Lewisham are aligned to.</p>
	<p>Emissions from developments and buildings #6: the K.P.I says "Numbers of proposals or projects where green infrastructure is used or enhanced to provide low exposure walking and cycling routes". There is no mention of secure cycle parking and adherence to the London or Local Plan (id 9.1 has a target for charging points). We believe new developments are an opportunity to create new walking and cycling routes or improve existing ones, but needs to be done as part of an integral plan to avoid a piecemeal or "tokenistic" approach.</p>	<p>Lewisham is ensuring that exposure in amenity spaces is considered at the design stage and as part of the Air Quality assessment for new development and redevelopment proposals. Also via the planning process, we will recommend, one Electric Vehicle charging point per dwelling with dedicated parking or one charging point per 10 spaces (unallocated parking) for all new residential developments. For commercial development, 10% of parking spaces to be provided with Electric Vehicle charge points.</p> <p>Additionally Lewisham is increasing cycle parking on street and in new developments in line with London Plan Standards. Cycle parking is already being provided but will be increased year on year.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	Delivery servicing and freight: the document doesn't mention electric cargo bikes and we urge the Council to use their existing contracts and frameworks to enable zero emissions cargo bike operations from Logistics Providers currently providing services in neighbouring boroughs.	There is a cargo bike scheme in place within the Borough but not currently utilised by the Council. Therefore, there is an opportunity to research the use of electric cargo bikes for use by the Council.
	Lewisham Cyclists understands that some existing underutilized facilities within its own estate, or those of partners, could be adapted to allow logistics providers to set up last-mile Delivery Hubs for cargo bikes. As an example of best practice Waltham Forest set up a Zero Emission Delivery service in 2016 with funding from the Mayor's Air Quality Fund.	There is an opportunity for Lewisham to look into allowing logistic providers to set up last mile delivery hubs for cargo bikes and learn from neighbouring boroughs (The Cross River Partnership, working on behalf of the Central London Sub Regional Transport Partnership (CLSRTP) are currently using last mile delivery hubs).
	No specific provision has been made for parking of electric cargo bikes. Lewisham Cyclists are calling upon the council to use their existing contracts and frameworks to provide more on carriageway residential cycle parking for both regular cycles and cargo bikes.	Electric cargo bikes provides an opportunity for Lewisham to expand the cycle parking in the Borough.
	Borough fleet actions: there is no mention of bicycles or cargo e-bikes. Incentives for the transition from motor vehicles to (electric) bikes could be established. Monitoring the mileage of the vehicles should also include the electric or low emission fleet so unnecessary trips are avoided.	<p>There is no plan for fleet bicycles or cargo e-bikes, but this is an opportunity for Lewisham to research. Lewisham recognised the need to reduce emissions within its own fleet, as set out in AQAP to lead by example and increase the number of ULEV in council owned fleet by 80% by 2022 and the whole fleet will be zero emission by 2030.</p> <p>As the lead authority for the Department for Environment, Food & Rural Affairs funded Cleaner Air Villages that support businesses in reducing pollution and congestion, public health officers led the liaison with Lewisham Hospital in deliveries and in Deptford High Street for use of cargo bikes. 1-2-1 business engagement took place in Lewisham Town Centre. It was anticipated, following a workshop due to be held in March 2020 (discussed below), further 1-2-1 meetings would take place to discuss business' involvement in the solution for this village. Unfortunately, both the workshop and any potential 1-2-1s were impacted by the COVID-19 lockdown.</p>
	Localised solutions (#18) mentions promotion of walking and cycling in the context of green spaces. We believe there is scope for more ambition to make green spaces safely accessible for walking and cycling with wider paths and better connectivity to existing infrastructure. Targets should be in line with those set out in the council's own Transport Strategy, Parks and Open Spaces Strategy and Borough Cycle Strategy.	<p>This AQAP is an opportunity to build on the success of our achievements and make Lewisham a cleaner, healthier, and greener borough. The Parks & Open Spaces Strategy feeds into the AQAP as does the Cycling Strategy, therefore the targets are aligned.</p> <p>Green infrastructure can provide a source of social, environmental and mental health Benefits through active travel and wellbeing. More than one fifth of the borough is green space and this includes an 8km long network along the Rivers Thames, Ravensbourne, Quaggy and Deptford Creek.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
		<p>Lewisham parks are among the best in the United Kingdom as 15 green spaces have been recognised by the Green Flag Award Scheme. They include Blackheath, Brookmill Park, Deptford Park and Ladywell Fields. Lewisham Council has been awarded £4.9 million from the Heritage Lottery Fund to improve Beckenham Place Park. Plans include an education centre, restored lake and new sports facilities.</p>
	<p>We would also ask the council to deliver on its targets set out in Vision Zero by also reconsidering the decision to not pursue FORS Gold Accreditation (Table B1) for its own Council fleet operations. We believe that fleet operations should be following the best practice available in order to meet Vision Zero aims as set out in the Council's own Transport and Cycle Strategies.</p>	<p>The Council is not pursuing FORS accreditation at this time. We're investing in fleet management systems and IT at the moment (financial constraints allowing) to raise standards and improve effectiveness but we are not yet in a position to seek FORS accreditation.</p>
	<p>Cleaner transport: infrastructure (#22.1 and #25): we call the council upon setting up specific targets that can be measured in terms of infrastructure built to LTN1/20 standards. . The target for #25.2, one cycling hangar per ward is extremely low considering the lengthy waiting list and lack of secure parking being one of the major factors preventing people from cycling. Again as a reference Waltham Forest included a target of installing 8 cycle hubs in their borough, next to stations.</p>	<p>LTN1/20 could be referenced into the cleaner transport section of the AQAP.</p> <p>LTN1/20 was published after the Lewisham Cycle Strategy so that's why there is no reference. But the principle applies to all new cycle infrastructure to follow Government guidance and standards.</p> <p>Cycle hangars provide spaces for a minimum of 6 bikes, the target of one per ward is a minimum and can be exceeded. There are currently 29 pending installations at this current time.</p>
	<p>We would also like the council to negotiate with TfL to bring the Santander Bike hire scheme to the Borough to provide active travel connectivity to new developments like Convoys Wharf, Deptford Timberyard, Lewisham Gateway, the Catford Masterplan and new developments along the A21 Corridor as detailed in the A21 Framework.</p>	<p>Lewisham is exploring cycle hire procurement to implement a permanent cycle hire scheme, assessing providers and will likely run a trial.</p>
<p><u>Natural England on 1st September 2021</u></p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	<p>The comments made have been noted and no further action is needed.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
 <p>366313 Natural England Response Let</p>		
Residents		
 <p>David Ford response.pdf</p>	<p>Mentions the lack of enforcement and monitoring for air pollution</p> <hr/> <p>ULEZ is just a means of funding TfL</p> <hr/> <p>We have higher pollution that ever before on the south circular. Pavements are not wide enough, constrained by planters.</p> <hr/> <p>Diesel emitting locomotives on the railway, long overdue replacing. These do no feature in the AQAP.</p>	<p>Lewisham is part of pan-London project MAQF NRMM Zone enforcement – to inspect construction sites in every borough to ensure they are using the cleanest construction equipment. The Enforcement Team within Lewisham will increase the number of enforcement visits/actions.</p> <p>Lewisham will participate in the Pan London Anti-Idling Project to raise awareness and include enforcement with enforcement officers to issue fines for idling offences. Also 100% of complaints about idling will be followed up with enforcement visit.</p> <p>For monitoring, there are five real time monitoring sites which can be found at the Lewisham website https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels</p> <p>NRMM used in construction currently accounts for approximately seven per cent of NOx and eight per cent of PM10 emissions in London therefore, regular enforcement (education) ensures those operators who comply see the benefits in continuing to do so.</p> <hr/> <p>Lewisham supports the ULEZ and has pushed for the expansion to cover all of Lewisham, but this is a TfL scheme and all money raised is collected and spent by TfL. TfL state that “TfL don't make a profit and we are committed to reducing our costs. Any money received from the ULEZ will be reinvested into improving the transport network, including cycleways, buses and Tube, and helping to improve London's air quality”.</p> <hr/> <p>CPZs are looking to improve the parking situation. Planters on the pavement should have received a licence and been investigated to allow adequate space for pedestrians and non-motorised users pass unobstructed.</p> <hr/> <p>TfL are responsible for London Overground services so Lewisham would need to liaise with TfL and other operators regarding the decline in regular train services. Lewisham are re-establishing the public transport liaison committee with a meeting held in January 2022. The issue of frequency and timetabling was raised and further work is being undertaken by operators as we emerge from the pandemic. However the financial impacts and reduced demand may mean that the operators are not keen to provide more services.</p>

Respondent	Comments or Further measures suggested:	Responses from LBL: Thank you for your response to LBL 2022-2027 AQAP consultation.
	Leegate development is removing trees and TPOs are being removed from trees in the area.	The Leegate Regeneration is redistributing public spaces to provide wider pavements that create extra room for new tree planting, helping to extend the treeline from the south and east towards the junction. This is part of a detailed landscaping and tree planting strategy. Details can be found at https://www.leegate-regeneration.co.uk/wp-content/uploads/2021/11/Leegate-Shopping-Centre-Community-Consultation-Document.pdf
	Collaborate with adjoining Boroughs, TfL, government and the people of the Borough	Collaborating with GLA and other London Boroughs is a priority for Lewisham. This consultation is allowing the people of Lewisham to contribute to the AQAP for the Borough they live in.
Paper responses Three (1-3)	<p>Respondent 1</p> <p>(a) Stop cutting down trees and building on green spaces</p> <p>(b) Strong enforcement of air quality policies</p> <p>(c) Grants, subsidies and incentives</p> <p>Respondent 2</p> <p>(a) Tell us how to avoid the dreadful air and how to protect children</p>	As above noted. Several campaign on air quality related issues will follow this plan and any query can be directed to the Environmental Protection at EnvironmentalProtection@lewisham.gov.uk .

B2- General Public Response to the AQAP consultation (Excel)

[Link to the excel document to be included here](#)

Response ID	Are you completing this consultation as: - How	Q.4 Please tell us if you think there is anything we have missed or should consider in relation to the previous Air Quality issues - Missed	Q5. Do you understand the personal contribution you can make to tackling poor air quality? - If yes, please specify, otherwise please tell us what we can do to help you understand how you can contribute.	Q8.What can Lewisham Council do to help you make these changes? - What can	LBL Response	Actions (Table 4.1 have been updated to reflect any changes suggested)
ANON-1JDS-WH9R-V	on behalf of a business/organisation/institution/community group/authority	<i>Why are only 'Most' major planning applications now subject to air quality and dust conditions. Why not all? What is the percentage that are not and what is the rationale for excluding these? Why are Minor sites not also included now that they too are subject to the Mayor's NRMM LEZ? Nine unit minors in particular, and especially where these are contiguous, are very significant contributors to poor AQ. Why are Civil and Infrastructural projects not also subject to special restrictions on the NRMM in use, either in overarching procurement contracts or otherwise. Are the generators and NRMM used in the set up of events, festivals or film shoots subject to requirements for the emissions stage deployed? Would the model planning condition applied to sites in regard to Dust and AQ be a useful appendix to the AQAP?</i>	<i>Non-car ownership Neighbourhood lifestyle UK-based holidays and avoidance of aviation</i>		Air Quality mitigation measures are being considered for all developments (i.e. small to major). Relevant and enforceable planning conditions or informative will be included on all planning consents for all new developments across the borough. Exemptions to and retrofit procedures for the Non-Road Mobile Machinery (NRMM) Low Emission Zone will follow the 2020 published GLA's revised exemptions and retrofit policy document as necessary. We are compiling a LBL Local plan, which will address all the issues relevant to sustainable development. The GLA has also recently begun public engagement on two pieces of London Plan Guidance – the Air Quality Neutral (AQN) guidance and the Air Quality Positive (AQP) guidance. GLA set up an engagement portal where you can access the documents, sign up to events and submit your responses via the survey – https://consult.london.gov.uk/air-quality-neutral .	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 2 presents any modifications relevant to managing emissions from developments and buildings.
ANON-1JDS-WH9X-2	a resident		<i>Drive less, cycle and walk more.</i>	<i>Make walking and cycling safer on the roads.</i>	LBL note the comments made. It is recognised that making our streets safer for walking and cycling is key to encouraging greater levels of sustainable and active travel.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WH99-3	a resident	<i>I would encourage you to be bolder. For instance we are seeing the first examples of municipalities making heat pumps the standard for new builds. Houses are set to become the biggest source of emissions in the borough and the council should start to set the tone, beginning with your own estate but also to new developments. Residents will then gradually follow suit when boilers need replacing. There also doesn't appear to be firm commitments to active travel or anything about promoting cycle storage in new developments. I would also like to see a strategy for increasing tree canopy coverage with more street trees across the borough (building on the work done by the Brockley Society for example). This has the added benefits of flood protection and lowering temperatures during heat waves.</i>	<i>I gave up car ownership in 2013 and use a bike trailer for almost all the things I previously used a car for. We still have a gas boiler which is our biggest source of scope 1 emissions. I hope to be able to replace this with a heat pump when it becomes more financially affordable to do so. As a citizen, I also try to add my support to any local initiatives in my area like school streets and influence friends and colleagues where possible.</i>		A LBL Local plan is being compiled to support the implementation of policies in the borough. This plan sets out detailed, technical guidance on how to mitigate and adapt to climate change, to minimise resource use and protect and enhance biodiversity. Sustainability focuses on meeting the needs of the present without compromising the ability of future generations to meet their needs. High quality sustainable developments require adopting a holistic approach to environmental, social and economic sustainability. This document will focus on the environmental dimensions of sustainability. The document will cover a number of topics to encourage a more prudent use of resources, protect environmental assets, mitigate the impact of climate change and adapt to its impacts: design led approach, energy and carbon, Climate Change resilience (to mitigate overheating and increased risk of flooding), water efficiency, Pollution to air, light and noise pollution, sustainable transport, biodiversity, waste management among others.	No action is needed because this is considered in the Draft LBL Local plan.
ANON-1JDS-WH99-1	a resident	<i>More Low Traffic Neighborhoods (get on with it), Partner with TfL for main road measures too.</i>	<i>I have already given up my car, I have stopped using my fireplace and I am thinking about getting an electric combi boiler to replace my current gas boiler.</i>	<i>Lewisham Council need to stop with all these consultations and actually start DELIVERING for residents. The council is well aware of the significant levels of pollution and pollution hotspots in the borough, we need to start seeing proposals or schemes to address these and quickly i.e. Low Traffic Neighborhoods</i>	There are mixed views around LTNs and require statutory consultation. This allows residents to engage with measures that will be introduced on their roads. Lewisham are committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them.	No change to the plan. The draft plan included an action (19.1) to work with all relevant organisations to improve air quality on strategic roads. This would include TfL. Consultation is part of the process of delivering the schemes outlined as part of the Cleaner Transport category.
ANON-1JDS-WH9Y-3	a resident	<i>Take more action on all - particularly burning materials and pollutants</i>	<i>Use public transportation Not having bonfires Use energy efficiently I think people need to be educated more on what they can do</i>	<i>I think more education is needed</i>	As detailed in our AQAP, we will reduce emissions from biomass burning (including domestic wood burning); we will adopt tighter minimum emission standards for burning stoves and a ban on domestic burning in areas with high PM2.5 levels. We will continue to search funding to carry out other work to reduce emission for burning material and be part of the London wood burning group. Addressing emission from construction site burning will be addressed in our Local Plan.	No significant changes needed. Table 4.1 Action 7 presents any modifications relevant to controlling and managing emissions from developments and buildings and also from burning of material.
ANON-1JDS-WH9T-X	a resident					

ANON-1JDS-WH91-U	a resident		<p>Walk or cycle rather than use a car. Don't idle engines if you have to drive and have a vehicle that has low emissions. Be aware of pollution from fires.</p>	<p>Charge people to park cars in all streets throughout the borough. Zero tolerance for parking on pavements. Install electric charging points. Engage with police to fine people for idling engines. Work with TfL to make sure public transport is well run and buses are not hindered by parked vehicles. Promote cycling and walking in schools. Provide cycle parking and lockup points. Ensure all Lewisham staff use public transport to get to work if possible.</p>	<p>There are 25 CPZs currently in Lewisham but Lewisham are committed to installing new CPZs across the borough, alongside delivering measures to reduce unnecessary car journeys and improve provision for sustainable and active transport, including walking, cycling, EV charging. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Parking on pavements is an issue through the Borough and greater investigation is required. Collaboration with TfL will benefit all and is important to Lewisham.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
ANON-1JDS-WH9B-C	a resident	<p>Need to encourage shift away from car ownership with massive extension of cpz and much higher price for polluting cars and for households' second cars.</p> <p>Need to think strategically about the proven ability of hedges to absorb air pollution and plant alongside main roads and along side of council owned estates this is also good for bio diversity and water absorption to help stop flooding</p>	<p>don't think as a non driver I contribute</p>	<p>small council tax discount for front hedges</p>	<p>There are 25 CPZs currently in Lewisham but Lewisham are supportive of installing new CPZs where required. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. The comment about council tax have been forwarded to the council tax department for consideration.</p>	<p>No changes needed as already addressed through a number of actions included in the plan.</p>
ANON-1JDS-WH9F-G	a resident			<p>Recycle our waste instead of burning it and encourage green transport options for all. Don't penalize those who own cars - instead those who enter the borough.</p>	<p>The comments have been noted and forwarded to the appropriate services (i.e. transport and waste management teams) for consideration.</p>	<p>No changes needed.</p>
ANON-1JDS-WH9G-H	a resident	<p>There is no mention of the importance of green space and trees in mitigating poor air quality. Other London boroughs are pushing ahead with ambitious tree planting initiatives whilst Lewisham continues to cut down mature trees which could be incorporated into development e.g. Arklow Road council housing site.</p> <p>No reference to the importance of walking and cycling to AQ and making that safe, convenient and affordable for residents e.g. more protected cycle routes, more cheaper on street bike lockers. Connected to this should be measures to discourage driving into the borough e.g. more CPZ - Lewisham has the lowest level of controlled parking across any inner London borough. More CPZ (with high charges for the most polluting vehicles such as SUVs and pick-up trucks) would make roads more pleasant for pedestrians e.g. fewer garages conducting on-street repairs and dumping/storing vehicles.</p>	<p>Walking, cycling or taking public transport on journeys of at least under 3 miles. Not buying wood burners. Efficient boilers. Planting trees and supporting wildlife</p>	<p>Introduce CPZ across the borough</p> <p>Integrate SUDS into any public realm changes. There seems to be little joined up thinking between highways, planning and the rest of the council on green initiatives. Again, see Hackney and the planting up/suds they've put in on central reservations and street filters. Lewisham just pour tarmac like it's the 1970s.</p>	<p>Our LBL 2020-2025 Parks and Open Spaces Strategy as well as the upcoming Local plan present some of the measures relevant to green infrastructure. The introduction of CPZ across the borough might have the unintended consequence that households pave over their front gardens to the detriment of air quality climate change. Comment about cooperation between different services have been noted. The air quality working group include different internal stakeholders, who contributed to the design of the actions described in draft plan. Actions considered include SUDS.</p>	<p>There are 25 CPZs currently in Lewisham but Lewisham are supportive of installing new CPZs where required, alongside the LTNs. Parking on pavements is an issue through the Borough and greater investigation is required. CPZs and Low Traffic Neighbourhoods are looking to improve the parking situation. Both can be requested by residents and Lewisham are looking to install more CPZs and LTNs</p>
ANON-1JDS-WH9H-J	a resident	<p>Controlled parking. Without this and restricting everyone from Kent using the borough as a car park the whole thing is a waste of time.</p>	<p>Yes. I went car free for 3 years but Lewisham didn't make it easy to cycle. Then the council closed wavelenghts. I bought a car so I can drive my family to swim and cycle elsewhere.</p>	<p>The council will not do the basics within the council control. Cycle storage, controlled parking. Why is the council looking for volunteers to creep around tackling idling. A joke. Get rid of the cars on our pavements and kill the rat runs.</p>	<p>There are 25 CPZs currently in Lewisham but Lewisham are supportive of installing new CPZs where required. Parking on pavements is an issue through the Borough and greater investigation is required. Cycle storage installation has dropped recently, however there is now a programme to install more cycle parking across the Borough. All other comments have been noted and will be considered by the relevant teams. The AQAP is to be owned and shaped not only by the council, but by all living, working and visiting the borough. Thus the involvement of the volunteers in our interventions to reduce air quality for the benefit of all. As reiterated by PHE (2020) Everyone has a role to play. Individuals need to change behaviours to reduce their exposure and their contribution to pollution. Local authorities are at the centre of local leadership and should coordinate and lead action. Employers, private and public-sector organisations should engage with local initiatives and play their part. The public sector should lead by example and national government needs to ensure a policy environment which supports local action and creates the right incentives.</p>	<p>No changes needed as already addressed through a number of actions included in the plan.</p>
ANON-1JDS-WH96-Z	a resident					

ANON-1JDS-WH9M-Q	a resident	<i>This is very hard to understand and complete - it has taken me an age to read through and work out answers - therefore concerned that this is not a fair consultation</i>	<i>Drive less (would love to switch to electric vehicle or go car free but job and finances are prohibitive) Be energy efficient at home</i>	<i>Subsidise electric vehicles Advise citizens on how to get finances for these expensive things Really want to do this but it's just too expensive Make any LTN schemes work for all people and not just the privileged (I live on Hither Green Lane and feel penalised by the current system) Anti - idling - needs to be regarded in conjunction with schemes that create longer traffic queues ad therefore increase idling and pollution significantly for some residents Fairness for all and not clean air for some is essential</i>	The Environmental Protection team is available (via the email provided) to respond to any queries relevant to the AQAP). Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Parking on pavements is an issue through the Borough and greater investigation is required. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time, but subsidies are not something that Lewisham can currently offer. The comment regarding LTNs is noted and as schemes are rolled out they will be informed by engagement with residents in and around the proposed scheme area.	The comments have been noted. This will be incorporated in Lewisham's Climate Emergency Action Plan.
ANON-1JDS-WH9S-W	a resident		<i>Choosing public transport or walking and cycling can make a significant difference.</i>		Comment noted.	No changes needed
ANON-1JDS-WH8D-D	worker in Lewisham		<i>im not really sure how i contribute to pollution but i cycle and am concerned about damage to my body through inhaling exhaust fumes constantly</i>		Comment noted and efforts appreciated. More information will be available on our website to enable help improve air quality.	No changes needed
ANON-1JDS-WH9A-B	a resident	<i>1. Road closures/LTNs (including Schools roads) have been 'strategically' placed around the borough in areas that does not have the highest levels of pollution (or the poorest air quality) - Most road closures/LTNs E.G. Lee green and School road have caused traffic to be pushed onto main/central roads, such as the south circular/Brownhill rd and Lewisham high street, causing increased journey times and more pollution, where the majority of pedestrians are - Travelling to work/School, shopping, leisure etc. School road closures have forced car users to park on neighbouring roads and not reduced the amount of car users, due to many factors such as - Parents not living in walking distance of the School (as implied) due to the ever expanding catchment area (or Schools accepting children from further afield) 2. Journey times have increased significantly due to not being able to access roads/short-cuts E.G. Burnt Ash road SE12 to Hither green, you are now forced to travel via Lewisham/Ladywell rd (Via Lee high road) due to not being able to cut through roads such as Eastdown park (and all other roads in lee/hither green). 3. All 'incentives' are pointless when nothing is being done regarding excessive amounts of HGV lorry's and other vehicles from out of borough, Kent and the A20 driven through the borough (Brownhill road & South-circular) on a daily basis. 4. Air quality monitoring is not taking place where it's most needed 5. The amount of construction taking place, building high-rise flats is excessive and increasing poor air quality.</i>	<i>Use re-usable energy where possible. However this is hard with a lack of funds/resources, living in Lewisham borough</i>	<i>Reduce HGV lorries and vehicles travelling from out of borough, through Lewisham/South circular Reduce the amount of passing traffic/commuters due to having a lack of good employment, Schools, health services, resources etc. (Reduce the amount of people employed in Lewisham Council that live outside the borough, where possible) Reduce the amount of construction taking place around the borough Re-think the placements of LTNs and road closures, or at least consider the impact this is actually causing. Monitor air quality where it's the poorest</i>	Locations of LTNs derive from consistent concerns raised with the Council by residents over a number of years about traffic congestion, traffic speeds, road safety and number of collisions, as well as walking and cycling improvements. Lewisham supports the extension of the ULEZ to cover the entire Borough. Air Quality monitoring has been expanded and priority is given to install further monitors around poorer and vulnerable receptors to meet new WHO targets and PHE priorities.	Table 4.1 addresses all the comments related to air quality monitoring and construction. The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in Action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration. Lewisham support the expansion of the ULEZ to cover the entire Borough. Our air quality monitoring regime is reviewed each year to represent better the site settings and the objectives of the monitoring. Any suggestions about air quality monitoring should be directed to Environmental Protection inbox- no change to the AQAP.
ANON-1JDS-WH8X-1	worker in Lewisham	<i>open up the roads that were closed recently, the extra traffic on the main roads has increased congestion beyond all reasonable limits and has contributed to higher pockets of pollution and has slowed down the public transport network</i>		<i>clear up the congestion by opening up the roads that have been closed, this increases traffic and journey times. This has caused many more problems than it has solved</i>	Locations of LTNs derive from consistent concerns raised with the Council by residents over a number of years about traffic congestion, traffic speeds, road safety and number of collisions, as well as walking and cycling improvements.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH8R-U	a resident	<i>I believe you must make people reassess their car usage. People should feel guilty to use their car unless they have no other option. Example: cars aren't shopping trolleys, people can walk to the supermarket or buy online; cars aren't pushchairs, families can walk to school even if it takes longer;..... Behaviours need to change, the council need to make driving/owning a car very very difficult (closing roads, ending free parking, giving priority to pedestrian in every situation....) I also need to mention ENFORCEMENT. The council seems to have great difficulties with law enforcement. We have sent numerous emails regards parking infringement and idling in our neighbourhood and pretty much nothing has been done. I am really hoping the council will be able to follow through with this great plan.</i>	<i>We don't own a car for 10 years now, we use public transport/walk, occasionally we take electric black cabs. We are also members of a car club for the rare occasions we need a car (furniture shopping, day trip outside London....). We regularly ask drivers to switch their engine off, we have a stretch of yellow line on our front and many times per day, drivers park and idle (leading, sometime, to aggressive confrontations). We keep our gas heating as low as possible during winter, around 18 degrees.</i>	<i>Make them mandatory</i>	Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Parking on pavements is an issue through the Borough and greater investigation is required. All other comments have been noted and will be considered by the relevant officers	No changes needed as already addressed through a number of actions included in the plan.
ANON-1JDS-WH8Y-2	a resident					

ANON-1JDS-WH95-Y	regular visitor to Lewisham			<i>Take measures to reduce congestion in general</i>	LBL agree with the comment made. Implementing measures to encourage active travel aims to reduce car journeys and in turn reduce congestion.	No changes needed as already addressed through a number of actions included in the plan.
ANON-1JDS-WH8V-Y	regular visitor to Lewisham			<i>Clean the street and improve waste collection across the borough</i>	The comments have been noted and forwarded to the appropriate services (waste and street cleansing Teams) for consideration and inclusion in their respective strategies.	No changes needed.
ANON-1JDS-WH8H-H	a resident	<i>Creating more green spaces, do not close the road as it creates more pollutions somewhere else and it is unfair to people who live on the roads with increased traffic; greater focus on education</i>	<i>Walk or take public transport when I can but I have 1 year old and sometimes it is impossible to go places without a car; drive responsibly, turning off engine when waiting; planting and taking care of plants and trees in my garden; contribute to community green space projects;</i>	<i>Education and showing a benefit of the changes; more green spaces and encourage community involvement in the spaces maintainance and care;</i>	The comments made have been noted. We will increase air quality information to the public, campaign, engagement and projects to raise public awareness about the air quality issues and behaviour change. Our Local plan and Open space and park strategy include actions to increase green infrastructure across the borough.	No changes needed.
ANON-1JDS-WH8K-M	a resident					
ANON-1JDS-WH8F-F	worker in	<i>n/a</i>				
ANON-1JDS-WH8Z-3	a resident		<i>Stop driving a car. Walk and use public transport.</i>		Pertinent comments noted .	No changes needed
ANON-1JDS-WH8B-B	a resident	<i>Closure of roads In Lee means more traffic along Torridon road and Brown hill Road south circular. Air pollution is awfull and many huge lorries travel down these roads resulting last week with major accident on corner of Torridon and Brownhill Road!! Remember a child died due to air pollution on South circular !! More of us will die in near future! Please listen.</i>		<i>A lot morelisten to residents who live I Torridon rd and Brownhill Road who are badly affected and you don't seem to care!</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.	No changes needed. Consultation is part of the process of delivering the schemes outlined as part of the Cleaner Transport category.
ANON-1JDS-WH86-Y	a resident			<i>Make residents have disposable income to cover cost of lifestyle changes</i>	We are not sure how LBL can make residents have disposable income. LBL does not offer income to all its residents. The comments have been noted.	No changes needed.
ANON-1JDS-WH8C-C	a resident	<i>Further "greening" around schools.</i>	<i>More attention to idling control and general car usage. Reduction in pollutant outputs in my control. More walking.</i>	<i>Provide more kerbside charging points. Support street "greening". Stagger building developments where they are in close proximity.</i>	As part of the air quality audits, we will identify and prioritise schools where greening is imperative and implement the measures as soon as possible and pending the availability of the right level of funding. The comment about new development will be addressed in our SPD in due course.	Our Local plan, Open space and park strategy, school air quality action plan will address the issue raised.
ANON-1JDS-WH8A-A	a resident		<i>I walk, cycle or take public transport rather than driving, whenever possible. I very rarely use my car in the week and only tend to use it for journeys out of London, ie when going away for a break at weekends. If trains were more reliable (ie running at weekends instead of engineering works) and more cost effective, I wouldn't drive out of London either.</i>	<i>1. To prioritise tackling high traffic levels in and around the A2/New Cross, where I live. Some days I struggle to breathe because I'm asthmatic. I like to walk or cycle but the level of pollution in my area is prohibitive, to say the least. Grants to replace boilers; advice and guidance on indoor pollution and how to tackle it.</i>	New Cross is an air quality Focus area that has been identified as having high levels of pollution and human exposure. Lewisham are looking to undertake a number of projects in the area. Advice and guidance on indoor pollution and how to tackle it will be provided on our website. The A beginner's guide to indoor air quality can be consulted at https://www.thebesa.com/news/who-campaigner-backs-beginner-s-guide-to-indoor-air-quality/ . Regarding grants for boilers, contacts should be made with the energy trust Government scheme (ECO3) 2018 supporting heating measures. see https://www.workworkltd.org.uk/?gclid=EAlaIqobChMI04PV9Jyi9AIVGLLtCh2IRgxAEAAAYiAAEgIdAvD_BwE and https://www.gov.uk/improve-energy-efficiency .	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH8G-V	on behalf of a business/organisation/institution/community group/author	<i>Our school is situated right next to Lewisham Centre which is used as a cut through for people driving to the centre. It makes things very dangerous for the children of our school and we can see very little being done about it.</i>	<i>Our school is situated right next to Lewisham Centre which is used as a cut through for people driving to the centre. It makes things very dangerous for the children of our school and we can see very little being done about it.</i>	<i>Our school is situated right next to Lewisham Centre which is used as a cut through for people driving to the centre. It makes things very dangerous for the children of our school and we can see very little being done about it.</i>	This location will be investigated to identify the current issues and any remedial measures that can be undertaken.	During the course of our School air quality action plan, this location will be investigated to identify the current issues and any remedial measures that can be undertaken.
ANON-1JDS-WH8Q-9	a resident		<i>Drive as a last resort and burn appropriate fuel in a defra approved stove</i>	<i>Make driving as difficult as possible, make public transport as easy as possible</i>	Agree with comment to make public transport easy to access. Implementing measures to encourage active and sustainable travel aims to reduce car journeys and in turn reduce congestion. It is noted that driving is still required through the Borough for some journeys but encouraging public transport and electric cars can help.	No changes needed
ANON-1JDS-WH8N-6	a resident	<i>Making retro-fitting a priority over demolition and building. Properly look after already mature trees. Properly look after the assets the council already has. Encourage tree-planting.</i>		<i>N/A</i>	LBL agree with all the proposals made. Our Park/open space/sport leisure & green scene team review LBL 2020-2025 Parks and Open Spaces Strategy and the comment made will be considered. We will enforce NRMM and possible retro-fitting where necessary via our planning system.	The comments will be incorporated in the review of the LBL 2020-2025 Parks and Open Spaces Strategy. Funding is available to support green infrastructure, such as the Community Tree Planting and Green Space Grants which can help support projects to plant trees and improve green spaces, including school playgrounds. www.london.gov.uk/greener-city

ANON-1JDS-WHGX-G	a resident	traffic jams on side streets -will this not be considered ? roads coming off the south circular are far too busy, side roads are congested with traffic seeing cars idling for sometime due to congestion, the constant honking of horns to push traffic over the lights then adds to noise pollution, parked cars on Sydenham Rise creates even more traffic as 363 Bus cannot get through then creates more noise pollution with honking of the horns, cars and motor bikes speeding up and the down this road creates noise pollution	most residents in Forest Hill cycle and take the train and those who can afford to buy electric cars have done so	address the traffic issue	Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Parking on pavements is an issue through the Borough and greater investigation is required. Sydenham Rise will be investigated to identify issues, subject to funding and resources.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHGP-8	a resident	If your proposals are to have any chance of working it is critical that: 1. You seek the views of residents and take on board their views BEFORE implementing any initiatives. The Lee Green LTN is a perfect example of failure to do this. 2. You need to set out criteria for judging the success of an initiative BEFORE implementation. The Lee Green LTN is a perfect example of failure to do this. 3. After implementation of a scheme, you must listen to residents's views and amend the initiative if necessary. The Lee Green LTN is a perfect example of failure to do this. 4. Initiatives must be practical and scaleable, taking into account the bigger picture, including, and particularly, the criticality of maintaining a strong economy. The Lee Green LTN is a perfect example of failure to do this.			If the Lewisham and Lee Green LTN had been introduced in usual times we would have consulted more widely with residents and ensured they were involved in the development of the scheme. Unfortunately, due to the timescales and expectations set by central government, councils were expected to rapidly introduce measures that would reallocate road space to walking and cycling without the preparatory work that would normally be undertaken for such measures. The results of any assessment of a scheme need to be considered in the round and balanced and it is not always appropriate to set out a success criteria when the scheme is first devised. Public consultations are not referendums and they are part of a wider range of considerations. All recommendations and decisions are set in the wider context of the Council's agreed policies and objectives.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHGW-F	a resident	Nowhere do you say other than schools the criteria you will use for selecting where the new monitors will go. There is no mention of AQFA specific actions. The Lee Green crossroads and Lee High Road / Eltham Road have bad of PM and NO levels and should be designated an AQFA as it is a red route from the south circular into London.	moving to an electric vehicles needs more charging points telling people to stop buying wood burning fires, you can smell the smoke in the air in the evening ask people to not use charcoal barbeques	consult on where new electric chargers are put work with business to provide more local pick up places for deliveries offer loans to business for electric delivery vehicles or cargo bikes	Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria. There are nine AQFAs identified and a summary of the projects to be undertaken, Lee High Road/Eltham Road are not on the list. Last mile delivery hubs are an area for Lewisham to look into. Consultation are undertaken for all new EV charging points.	The comments made will be considered and actioned in the redesign of the School Air Quality action plan. No changes to the draft AQAP.
ANON-1JDS-WHG3-B	a resident		Use car less			
ANON-1JDS-WHG1-9	a resident	These proposals feel a bit timid given the importance of the problem. For instance it would have been better if there were more ambitious plans for segregated cycling across the Borough and pedestrianising Deptford High Street.	Avoid unnecessary journeys by car, don't burn things, etc.	Install charging points for electric vehicles on all residential streets. Provide improved cycling infrastructure. Connect residents with tradespeople who can check air quality and provide incentives to replace boilers.	We review EV charging sites based on demand and requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location. Agree with comment on cycling and implementing measures to encourage active travel aims to reduce car journeys and in turn reduce congestion. Regarding grants for boilers, contacts should be made with the energy trust Government scheme (ECO3) 2018 supporting heating measures. see https://www.workworkltd.org.uk/?gclid=EAIaIQobChMI04PV9JyI9AIVGLLtCh2IRgxAEAAAYAAEgIdAvD_BwE and https://www.gov.uk/improve-energy-efficiency .	We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location, we introduce site feasibility criteria that will be considered and applied. This includes factors such as sufficient power distribution, minimum distances from specific utilities, and ensuring that adequate footway clearances are maintained Ward Members and residents will be consulted on the locations prior to installation. 3 quietway routes have been delivered apart from Southend Lane and the Waterlink Way Bridge, the programmes of which have now been paused until further notice due to the COVID-19 outbreak. Deptford Parks Liveable Neighbourhood has reached Stage Gate 3 and outline design and the business case has been finalised and submitted to TfL for review. However, the programme is now on hold until further notice due to the COVID-19 outbreak. Pedestrianisation of Prince Street and Scawen Road (outside Francis Drake School) have been installed as well as 4 x Copenhagen crossings on Crook Road, Avignon Road, Kezia Street and Etta Street. It is difficult to quantify with certainty the reduction in emissions or concentration that can be achieved on specific projects through modal shift from car
ANON-1JDS-WHGM-5	a resident					
ANON-1JDS-WHGA-S	a resident		Mainly using alternative modes of transport such as cycling and walking.	As a private tenant, it would be helpful if landlords can be encouraged or compelled to implement measures to combat air pollution, where these are not within the control of tenants.	LBL agree with all the proposals made. However, this comment should be directed to central government who is responsible for lettings legislation and safety regulation. Where LBL has regulatory powers like with Houses in Multiple Occupation (HMO), council estate, air quality will be considered.	No changes needed.

ANON-1JDS-WH5R-R	a resident	<i>Your plan seems to just be electric cars. That's not a sound strategy. You need to reduce reliance on cars and build safe walking and cycling infrastructure - then not remove it at the first sign of complaint.</i>		<i>Build safe cycling infrastructure. Enforce speed limits. Enforce pavement parking.</i>	Agree with comment on cycling and implementing measures to encourage active travel aims to reduce car journeys and encouraging a shift away from car ownership but this is behaviour change and will take time. Parking on pavements is an issue through the Borough and grater investigation is required	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WH5J-G	a resident		<i>Cycling, walking, no car, plant more trees on streets.</i>	<i>Stop cars coming into centre of or near streets to Lewisham shopping, make it all green and pedestrianised, no cars on streets where schools are, people should get trains. Plant more trees in nearby streets as they are a natural source of oxygen, and controls carbon dioxide. Stop car Isolina by installing cameras and fining people. No cars driven up to schools. No cars parking for shopping, people should be encouraged to walk, bus or train.</i>	School Streets have been installed and Lewisham are looking to install more where supported, subject to funding being identified. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WH5P-P	a resident		<i>No burning of fuels and Active travel</i>			
ANON-1JDS-WH54-T	a resident	<i>The way you have generated the demonisation of car drivers and hostile rhetoric and behaviour of the middle class zealots in leafy Lee Green to divide the community has totally undermined your authority and cred on the subject matter. There are no more bicycles that there were before, the cycle lanes on Lewisham High Street and Molesworth Street are not used (cyclists, and now scooters, still ride on pavements and could not care less about pedestrians and old people). You just do not win hearts and minds by alienating the majority of your residents. It's a real shame because climate change is real but you have screwed it with your inexperienced Cllrs who unfortunately do not possess the people and negotiating skills to bring communities together.</i>	<i>I don't need you to tell me what to do, and I am happy to take steps to reduce my carbon footprint as is appropriate, doable and is physically and financially possible. Your great plans unfortunately make no allowance for people with mobility issues, older people, financial status and street safety at night for women expected to walk long distances, alone in the dark. It's such a shame that you lose support by dismissing too many residents.</i>	<i>Your great plans unfortunately make no allowance for people with mobility issues, older people, financial status and street safety at night for women expected to walk long distances, alone in the dark. Are you going to damage the reputation of volunteering by recruiting zealot 'champions' to spy on and report car idlers and yet completely turn a blind eye on unaccountable and dangerous anarchists riding scooters and bicycles on pavements and in one way streets? Some with children with no helmets sitting on handlebars</i>	Comments are noted. There are mixed views about Low Traffic Neighbourhoods in Lewisham and across London. The needs of people with protected characteristics, such as disabled people and people with mobility impairments, are considered and assessed. For the Lewisham and Lee Green LTN there is an equalities impact assessment and registered Lewisham Blue Badge holders are exempt from the camera enforced restrictions.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH52-R	a resident	<i>The Drakefell Road / Gellatly Road corridor carries large amounts of traffic every day. Air quality is likely very bad. Residents have been in dialogue with ward Councillors and relevant Cabinet members for many years. Not a single measure of improvement has been implemented. The Council funded a traffic study in 2016 (run by Project Centre) for this corridor. The study came up with various recommendations to eg reduce HGV traffic and thereby pollution. None of the recommendations has been implemented. No reason been given why they have not been actioned. I ask the Council to prioritise this corridor for the benefit of its 500+ residents. The corridor is over 1 Kilometer long and is crossed daily by countless families and children on their way to school and nursery. At present there is only one crossing where pedestrians have right of way over cars.</i>	<i>The Drakefell Road / Gellatly Road corridor carries large amounts of traffic every day. Air quality is likely very bad. Residents have been in dialogue with ward Councillors and relevant Cabinet members for many years. Not a single measure of improvement has been implemented. The Council funded a traffic study in 2016 (run by Project Centre) for this corridor. The study came up with various recommendations to eg reduce HGV traffic and thereby pollution. None of the recommendations has been implemented. No reason been given why they have not been actioned. I ask the Council to prioritise this corridor for the benefit of its 500+ residents. The corridor is over 1 Kilometer long and is crossed daily by countless families and children on their way to school and nursery. At present there is only one crossing where pedestrians have right of way over cars.</i>		It should be noted that this road is a B road and so it is likely to have a higher movement function. The request to prioritise the Drakefell Rd / Gellatly Road corridor is noted and will be considered when setting future programmes.	No change required to the plan. Officers are aware of the concerns about the Drakefell Road / Gellatly Rd corridor. Some measures have been progressed and further consideration will be given to this corridor when funding is available.

ANON-1JDS-WH55-U	a resident	<p><i>ULEZ is a good thing if you live within it. It will be awful for those of us just outside it. We already see increased volumes of traffic thanks to the ill-thought out LTN in Lee Green. You are aware that the council should look after everyone that lives in the borough? Because you seem to have forgotten those who live on the southside of Burnt Ash Hill.</i></p> <p><i>The Council needs to grow a pair. The reason things are so rubbish here is because you don't punish people for doing the wrong thing. You can basically do what you want knowing that the council will do nothing about it, that includes, speeding drivers, HGVs ignoring road signs, flytipping, burning rubbish in your garden, parking massive cars on the pavement, idling all day and night, dog crap EVERYWHERE, parks left in disrepair, streets with rubbish everywhere, public spaces used and abused by the general public. People do these things because they no there is no repercussions.</i></p>	<p><i>Is the question correct? Shouldn't it say if No?</i></p> <p><i>My personal contribution is:</i></p> <p><i>I can't/don't drive</i> <i>I don't burn things in the garden because I cannot afford a house with a garden</i> <i>I don't have one of those wood burners posh people have</i> <i>I don't have kids</i> <i>I would never live in a new build let alone be able to afford one</i> <i>I walk everywhere and no longer use the bus at the Lee Green LTN has made bus travel much harder to do (3 x long journeys, routes cut short etc)</i></p>	<p><i>Is this related to the question above - it is not obvious.</i></p>	<p>The Council is committed to improving the environment for all of its residents. Lewisham supports the extension of the ULEZ to cover the entire Borough. The council carry out enforcement actions in different aspect of environmental protection.</p>	<p>No changes needed as already addressed through a number of actions included in the plan.</p>
ANON-1JDS-WH5V-V	a resident	<p><i>Create segregated cycleways throughout Lewisham. Promote cycling, walking and public transport more. Stop diesel trains running through the borough. Ban diesel HGV vehicles. Switch all Lewisham borough and public transport vehicles to hydrogen or electric. Stop aeroplanes flying over London. Free up roads so buses can move more freely as average mph across London is down vs 10 years ago. Make greener options including electric cars affordable for low income groups. Remove gas cookers. Use renewable energies. Make electric bicycles more affordable, especially those that transport families.</i></p>	<p><i>Use ICE vehicles less, switch to greener renewable energies e.g. solar, source pumps etc., walk more, cycle more, fly less...</i></p>	<p><i>Lower costs, subsidise/reward and better educate</i></p>	<p>Comments are noted. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Lewisham supports the extension of the ULEZ to cover the entire Borough.</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
ANON-1JDS-WH53-S	a resident					
ANON-1JDS-WH5T-T	a resident					
ANON-1JDS-WH5H-E	a resident					
ANON-1JDS-WH51-Q	a resident					
ANON-1JDS-WH5K-H	on behalf of a business/organisation/institution/community group/authority	<p><i>Needs to be much clearer about how to tackle specific localised air pollution such as on the South Circular.</i></p>	<p><i>I understand how little personal contribution I make to poor air quality so I don't need to be told how I can contribute.</i></p>	<p><i>Nothing.</i></p>	<p>Agree with comments. Lewisham supports the extension of the ULEZ to cover the entire Borough. The South Circular is a road for which TfL is the highway authority. Lewisham will work with TfL to improve air quality along this strategic corridor.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
ANON-1JDS-WH5Z-Z	a resident					
ANON-1JDS-WH5F-C	regular visitor to Lewisham	<p><i>What ever is put in these comments are ignored by the dictatorship attitudes from all councils and the government</i></p>		<p><i>Resign</i></p>	<p>Noted. No commentary has been made on this.</p>	<p>No changes needed.</p>

ANON-1JDS-WH56-V	a resident	<p><i>Air quality: no mention of publishing this data or making it available to residents - surely it should be accessible from the council website</i></p> <p><i>Walking: I have searched the giant 100+ page plan and there is not a single proposed action to promote walking (apart from walking to school). Lots of references to facilitating it but what do you actually propose to do? Improved crossings, better traffic light sequencing, better signalling of crossing points. So far all I have seen from the LTN is increased congestion making it HARDER to cross the road or MORE unhealthy to walk along it.</i></p> <p><i>It would have been helpful if the categories in section 3 had ALL matched the section headings in the action plan. The last category in section 3 is so woolly, I can't even determine what it means, let alone whether you are likely to achieve it.</i></p>	<p><i>Parking our hybrid on the driveway where we can charge it to reduce emissions - it's a shame</i></p> <p><i>Lewisham council parking policies encourage us to park our PETROL only car on the driveway and NOT CHARGE our hybrid.</i></p> <p><i>Taking the shortest, least congested route to our destination. It's a shame the LTN makes EVERY journey longer and more likely to sit in congested traffic. There also seems to be a lack of understanding that whilst entirely local journeys can sometimes be replaced by cycle/walk, all long-distance travels starts as local travel and thus cannot be walking or cycling.</i></p>	<p><i>I don't feel the council does anything to promote hybrid vehicles over petrol/diesel ones, even though for local journeys (<5 miles), our car runs entirely without emissions. The LTN should certainly not apply to 100% electric vehicles and I would suggest at this stage hybrid ones as well.</i></p> <p><i>I have searched the giant 100+ page plan and there is not a single proposed action to promote walking (apart from walking to school). Lots of references to facilitating it but what do you actually propose to do? Improved crossings, better traffic light sequencing, better signalling of crossing points. Remove the LTN as this increase congestion and pollution making it harder to cross Burnt Ash Road and much less pleasant to walk along it.</i></p> <p><i>Not encouraging hybrid owners with a second car to park the hybrid on the road where it won't get charged (as the parking permit is cheaper)</i></p> <p><i>Remove the LTN so that journey times are shorter, fuel usage is lower, congestion is lower and people living on busier roads are not unfairly burdened at the expense of other barricaded roads</i></p>	<p>Air Quality data for the five monitoring sites is available to the public on the Lewisham website. We will continue to publicise all our data and alert system. Agree with comments on walking but not every scheme will be detailed in the AQAP. The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.</p>	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <p>A shift to electric vehicles is encouraged through the ongoing expansion of our electric vehicle charging network. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
ANON-1JDS-WH5M-K	a resident	<p><i>I think more should be done to encourage a transition to electric vehicles and to avoid traffic congestion.</i></p> <p><i>The public transport network should be improved, to enable residents to choose it where possible rather than use cars.</i></p> <p><i>I think the best way to ensure that meaningful change happens is through public campaigns. A recent example is the government's vaccination campaign, which was very successful. There was a period where I could see vaccination billboards and hear vaccination messages in commercials everywhere. I think Lewisham should invest in public campaigns to persuade people not to use their cars for short journeys.</i></p> <p><i>I also hear about lots of parents who drive their kids to school. I think children, once they reach an appropriate age, should feel safe to walk or cycle to school, and this should be encouraged by the Lewisham council, and appropriate infrastructure should be built. Most journeys to school by car are under 2 miles, and it's an almost daily thing.</i></p> <p><i>Something should also be done about commercial traffic, there is a lot of it, especially on the A2. Could more businesses shift to electric, and could Lewisham council do more to encourage this?</i></p>	<p><i>I am not a car owner, I often choose walking or cycling where possible. I also plan to install solar panels in my home.</i></p> <p><i>I think there are many people are not aware of how they can personally contribute, and Lewisham council should invest in public campaigns, to ensure that more people have awareness of the air quality problems and what can they do,</i></p>	<p><i>More bike lanes - I live on the A2 and am afraid to cycle on this road. More trees. I do not have a car, but I think the main deterrent for people buying electric vehicles is cost. Not sure if Lewisham can do something to reduce costs or if needs to be done at the government level. Availability of charging points is also important.</i></p> <p><i>I never heard of indoor quality check - perhaps Lewisham could offer this to residents?</i></p>	<p>It is the intention of LBL to carry out several air quality campaign during the course of this plan. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria. We have a programme to roll out electric vehicle charging infrastructure across the borough. Whilst EV's are part of a wider solution that also encourages journeys to be made on foot or by bike.</p>	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
ANON-1JDS-WH5C-9	a resident			<p><i>Nothing. You are pretty useless at anything</i></p>	<p>Comment noted.</p>	

ANON-1JDS-WH5U-U	a resident	<i>Stop moving all traffic on to main roads, people live on these roads and many schools and widely used amenities are on main roads. They are also used by pedestrians significantly more than side roads as direct routes to their destination. Pointless changes to traffic flow create stationary traffic creating pollution and particulates.</i>	<i>Driving less frequently a hybrid car and when financially possible making appropriate changes to my home. I do need the assistance to make these changes. There is no incentive for me to install say solar panels when the benefits accrue over a long period and I cannot pass on the pro rata cost to any new owner of my home. I am sure this discourages a lot of home owners from making "green " improvements</i>	<i>Financial assistance, lobbying for sensible changes i.e enabling green improvements to be added on to mortgages or pass on the remaining cost to the new owners. There are no further changes I can make to my home that would not financially disadvantage me but advantage any new home owner.</i> <i>Think about the health and wellbeing of all residents, I do not see why residents living on busy roads should have to endure excessive air pollution so that some residents can benefit from LTNs!</i>	It is not the intention of schemes being delivered to move traffic from one place to another, but to reduce the number of unnecessary car journeys and encourage active and sustainable modes of travel. Lewisham is committed to improving the environment across the borough.	The comments made will be considered and actioned in the redesign of the School Air Quality action plan. No changes to the draft AQAP.
ANON-1JDS-WH5S-S	a resident	<i>Typical Lewisham Council. Seven choices in Question 2 "Priorities" which force the response to show support for some of your bad choices.</i> <i>Selective and misleading use of data to support the decisions you already intend to take.</i> <i>Simply focused on being anti-car.</i> <i>You have allowed unprecedented building of large tower blocks across the borough which will have generated significant carbon emissions yet this doesn't rate a mention.</i> <i>Nothing to support helping residents to move to electric vehicles as you don't want cars.</i> <i>You're clearly set on causing as much disruption (and its associated pollution) as possible for drivers hoping they give up on their cars.</i> <i>You are an undemocratic, misguided and frankly dangerous group of Council officers who are getting paid by tax payers and residents to try and force through your idiotic ideas.</i> <i>If you're pseudo science based policies are truly part of the answer to climate change the planet is clearly in trouble.</i>		<i>Stop using data selectively to justify your foolish policies which reflect an obsession with removing all cars</i>	The air quality monitoring data in the AQAP presented is factual and the full dataset is available upon request and on our website for a review and assessment by the public. Other comments have been noted and forwarded to the relevant services.	Comment noted and no further actions needed.
ANON-1JDS-WHJD-Y	a resident		<i>Less car use</i>			
ANON-1JDS-WHJQ-C	a resident	<i>Impact of traffic reduction measures on surrounding streets, particularly near the South Circular (which is often a traffic jam)</i>			The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.	No changes to the draft AQAP. The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration. Lewisham support the expansion of the ULEZ to cover the entire Borough.
ANON-1JDS-WHJR-D	a resident					
ANON-1JDS-WHJJ-5	a resident	<i>Cars do not produce Co2. Co2 is what you should be aiming to reduce. Also conservation committees that rally against solar panels because it does not fit in with the area is just plain stupid. As a council you should allow all homes to be greener. Homes produce the most CO2 in every london borough as you know. The latest closures of roads in Lee builds up higher emissions on main roads, where most buses travel Those people that cannot afford cars are in effect suffering a double whammy, slower journey times and higher pollution, it is an attack on the poorest in our borough. More people are moving to EV anyway which will reduce pollutants without any road closures or re directions.</i>	<i>Have greener homes</i>		Comment noted. Cars do produce CO ₂ more than NO _x . Please read London Atmospheric Emissions Inventory (LAEI) 2016 for pollution source apportionation.	The LBL transport statement presents the changes to the AQAP.
ANON-1JDS-WHJX-K	a resident	<i>Get rid of LTNs. They have done more harm than good, and resulted in more idle traffic pollution</i>	<i>No smoking. Less driving.</i>	<i>Get rid of LTNs so the main roads aren't so congested and awful to cycle on.</i>	A response to the comments made on our proposed transport/highway/parking interventions will be provided in the transport AQ specific policy statement to be issued in addendum of this report.	See the LBL transport AQ specific Policy Statement for suggestions.
ANON-1JDS-WHJ4-F	a resident		<i>By not burning rubbish.</i>			
ANON-1JDS-WHJW-J	a resident	<i>There needs to be a better focus on active travel instead of relying on electric cars. Cargo bikes and electric bikes enable even more people to cycle and move goods around but the infrastructure is severely lacking. Just hoping residents will buy electric cars will not bring us to net zero.</i>		<i>More cycling parking. More cycle lanes. More low traffic neighbourhoods. Road traffic is preventing people from walking and cycling.</i>	Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all, including healthy neighbourhoods and cycle parking	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.

ANON-1JDS-WHJ2-D	a resident	<i>Focus should be on discouraging car use - this means making it easier for people to use on public transport and walk/cycle but also making car travel more expensive through for example car parking costs or workplace parking levys</i>	<i>Avoid using a car where I can given congested nature of roads. Walk and cycle where possible Don't burn wet wood</i>		Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHJV-H	a resident	<i>Much more priority should be given to supporting walking and cycling. For example, progress on LTNs in Lewisham rank the lowest of all of London's inner boroughs. Dedicated cycle lanes in Lewisham rank among the lowest of London's inner boroughs. There is a huge amount of work to do and progress has been shamefully slow over the last few years.</i>	<i>I would really like my kids to cycle to school. Rat runs and high volume of traffic make this near impossible as it's too dangerous. Safe cycling infrastructure and implementation of LTNs are urgently needed across the borough.</i>		Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all, including healthy neighbourhoods and cycle parking. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicted air quality concentration of pollutants among other criteria.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHJ5-G	a resident		<i>Improve the links between local areas by public transport. I live in Lee and to visit a friend in Deptford requires at least one change whether I go by bus or DLR, the same for Greenwich. Time is also a factor: I want to do what I can to reduce car use but using public transport means allowing far more time to get to my destination than driving would. It will be very difficult to convince those who see driving as their right to travel by other means without making public transport a more appealing option.</i>	<i>Petition the government for funding to help people make changes to their homes that will improve air quality. Manage projects like the implementation of the LTNs better: I support the idea but the lack of information about their purpose and confusing implementation, with information only provided to local residents and not on street signs for those live outside the area or don't read information put through their door started them off very badly.</i>	The council will work with TfL to improve public transport links where possible. The comments regarding the delivery of the LTN are noted. As this was implemented during the pandemic it was not delivered in the way projects usually would and the issues that this created are recognised. Under the Governments ECO3 Scheme, Eligible home owners could have their old inefficient/Broken boilers replaced completely free of charge, or heavily subsidised. If you qualify, we can arrange your free boiler replacement done within few days.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHJK-6	a resident		<i>I understand that I can tackle poor air quality by not driving, minimising fossil fuel use in the home, for example by installing solar panels. Not burning stuff such as using a woodburner. Cycling and walking on less polluted streets where possible. Not getting stuff delivered by vehicles with engines. Planting trees</i>	<i>Lewisham Council can be more active in challenging those who idle their cars. I frequently have an issue with car idlers outside my house. If they're not challenged and fined by authority, not sure they will have incentive to change. Some are unaware it's a problem so more publicity would be good.</i>	The comments have been noted.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHJG-2	a resident	<i>1. To encourage electric vehicle adoption, the biggest issue will be how to charge cars at home when many properties do not have a driveway. Even if cables were laid across pavements, there is no guarantee that cars will be close enough to home for the cable to reach. The council is ideally placed to find a solution to charging vehicles parked on the street. 2. Further work is needed to explain the link between speed humps and increased emissions from constant braking and accelerating. Perhaps humps could be replaced with average speed cameras on major thoroughfares to avoid this problem. 3. Please do not penalise car use through parking charges / availability. For many journeys within the borough, car is the only practical choice. Instead focus on ways to reduce pollution from cars (EV adoption, reduced congestion, alternatives to speed humps, etc.)</i>	<i>Don't burn rubbish, walk short journeys, consider electric vehicle for my next car.</i>	<i>Advise how I can charge an electric vehicle at home when I have no drive and need to park on the street. This could be clear policy on long cables, or some sort of charging infrastructure along the kerb or at lighting columns.</i>	Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location.	No changes to the draft AQAP. Comments noted and already considered in the draft plan. A shift to electric vehicles is encouraged through the ongoing expansion of our electric vehicle charging network. The Low Emission Vehicle Charging Strategy aims to ensure that everyone in the borough is no further than 500m from an electric vehicle charge point.
ANON-1JDS-WHJC-X	a resident	<i>The introduction of the LTNs has significantly reduced the air quality on the surrounding roads as ALL traffic is now forced on to those. I can't see anything in the plans which addresses this. I also couldn't see anything which would ensure that emissions from buses are reduced.</i>	<i>Encouraging use of electric cars (we have one already) and encouraging people to improve the energy efficiency of their property.</i>		The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. TfL are committed to reducing emissions of buses.	No changes needed as already address through a number of actions included in the plan.

ANON-1JDS-WHJM-8 a resident	<p>I live on the Drakefell/Gellatly Roads thoroughfare. For over twenty years residents have been asking for a safer street with less pollution and proper air quality monitoring. All requests have been steadfastly ignored by the Council. Over that period, the situation has worsened, with increased volumes of traffic and longer and longer rush hours. Residents have invested endless time and energy in so-called consultation exercises to improve the situation on this street, all to no avail. For example, in 2016, the Council funded a traffic study run by Project Centre for this thoroughfare. The study made a number of recommendations which would, among other things, have reduced HGV traffic on the street. Not a single recommendation was implemented and no reason was given for this failure to act.</p> <p>150 households are affected by the pollution on this thoroughfare. I, personally, have contracted late onset asthma after twenty-six years of living here. We wonder why our lives are considered worth so much less than those of people living on other streets.</p> <p>What's more, a number of us are not convinced by the arguments put forward to support the Council's initiatives. Road usage has shifted because of our increasing dependence on home deliveries and the fact that there will always be tradesman who need to drive vehicles around our neighbourhoods to be able to do their work. Plus, there are people who are afraid to return to using public transport because of the pandemic and who now use secondhand cars as their preferred means of transport. Encouraging people to walk and cycle can only be part of the solution. Any implementation plans to be based on a comprehensive analysis of who is using vehicles and why, along with a robust assessment of how current trends are likely to develop.</p>	<p>I know exactly how I can contribute. The question is: does the Council? Promises have been made and repeatedly broken. We are sick to death of ongoing consultation exercises which result in no improvements for us. The Council is committed to these consultations, but fails to hear what residents are actually telling them on a regular basis. It has done nothing to alleviate our concerns for more than twenty years, and the present Cabinet member for Environment and Transport can't even manage to answer an email on the subject.</p> <p>You have managed to install 51 air monitoring stations in LTNs, but not a single one on this thoroughfare which is a designated B road. This is completely unacceptable, and change is essential.</p>	<p>Invest in them.</p> <p>Act upon proposals made by residents, and stop wasting our time!!!!</p>	<p>Comments regarding the Drakefell Rd / Gellatly Rd corridor are noted. Pending the availability of funding more air quality monitors will be installed on designated B roads during the course of this plan. The locations of our current monitors on B roads can viewed directly via the Love Clean air website at https://lovecleanair.org/local-air/air-quality-map/</p>	No change
ANON-1JDS-WHJS-E a resident	<p>Electric two wheelers offer an alternative and emission free mode of transport for those that can't cycle and need to transport smaller items. Also cutting of trees should be kept to a minimum.</p>	<p>I drive an electric vehicle and avoid longer journeys by car altogether. We walk to school and plant trees on our private property.</p>	<p>Show examples of what other people in similar economic circumstances have achieved and point out the success and different solutions available. Advice like "walk more" is not the most enticing solution, instead technology or infrastructure possibilities are often of high interest.</p>	<p>Comments noted and sent to the relevant teams for consideration.</p>	<p>The comments made will be considered during the course of this plan. More case studies will be used during air quality campaigns.</p>
ANON-1JDS-WH2Q-M a resident	<p>You need to make far stronger commitments to reducing car use and encouraging active transport; there needs to be far more detailed plans to massively increasing the cycle network in Lewisham, enforcing speed limits, and giving more space and priority to pedestrians. Urban greening - increasing the number of trees and plants placed in the public realm - appears strikingly absent from this plan, but plants help support air quality.</p>	<p>cycling more</p>	<p>increase the number of cycle sheds and parking spaces in the borough</p>	<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Cycle storage installation has dropped recently, however there is now a programme to install more cycle parking across the Borough. Other strategy include our LBL 2020-2025 Parks and Open Spaces Strategy and our local plan which include measures to increase green infrastructure across the</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
ANON-1JDS-WH2N-H a resident			<p>Financial incentives. Council tax discount for installing low-polluting, energy-efficient boiler and fines for repeated transgressions which are avoidable and inexcusable.</p>	<p>Noted. Although a council tax discount would be an unfunded additional pressure to the council, this comment has been passed on to the council tax department for consideration in due course. with reference to boilers, under the Governments ECO3 Scheme, Eligible home owners could have their old inefficient/Broken boilers replaced completely free of charge, or heavily subsidised. If you qualify, we can arrange your free boiler replacement done within few days. Contact should be made to the Energy trust for further information about relevant schemes.</p>	No changes needed.
ANON-1JDS-WH2J-D a resident	<p>There need to be more specifics about getting people out of cars for short local journeys. There is also no mention of cargo bikes, which are a solution to 'last mile' deliveries. Use of these delivery vehicles benefits from improved cycling infrastructure. Making large electric/hybrid vehicles more noisy would aid cycle safety as the ears are the best way of detecting vehicles approaching from behind, and allow some prediction of driver behaviour from changes in engine noise.</p>	<p>I rarely use a car in the city, except to transport large objects. Where I can I cycle. I've got a smart meter at home. I have no open fire.</p>	<p>Improve cycling and walking infrastructure. More controlled parking zones. Extend the school streets idea, and put non-car transport top of the list in school travel plans. Put in more modal filters on residential streets (including mine) to deter rat-running. Do a really really good study of the effect of extending the ULEZ, starting immediately for the pre-extension period. We don't just need pollution monitoring, we need good data on traffic movements, as the go-to complaint about modal filters and low traffic neighbourhoods is that the traffic is displaced rather than discouraged, and pollutes main roads more. The data on this has been massively skewed by the effects of the pandemic on transport choices, and the modal share of car use needs to be an important part of the calculation. People are still avoiding public transport for fear of infection (apart from those who choose not to wear masks despite the legal requirement).</p>	<p>Agree with comment to implement measures to encourage active travel aims to reduce car journeys and in turn reduce congestion. It is noted that driving is still required through the Borough for some journeys but encouraging public transport and electric cars can help. There are 25 CPZs currently in Lewisham but Lewisham are supportive of installing new CPZs where required. School Streets have been installed and Lewisham are looking to install more where supported. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling. The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration. Lewisham support the expansion of the ULEZ to cover the entire Borough.</p>

ANON-1JDS-WHG2-A a resident	<i>The building of high-rise, high-density residential property next to major traffic junctions.</i>			This comment will be considered during the design of our Local Plan.	No changes needed.
ANON-1JDS-WH2P-K a resident	<i>Include green spaces and trees as important contribution to air quality and promote and preserve these natural defences</i>	<i>Electric vehicle, cycling, walking, reduction in energy consumption</i>	<i>Recommend electric vehicle point installers that are reasonably priced and that will be compatible now and in the future</i>	This is being considered in our Local plan.	No changes needed.
ANON-1JDS-WH29-V a resident	<i>Consultation with TfL to improve public transport options in certain areas of the Borough.</i> <i>Ensuring that neighbouring streets without controlled parking are not negatively impacted by new low emission parking permits. Will it just encourage people to park on neighbouring roads? Milborough Crescent is parked full of enterprise and commuter cars.</i>	<i>Grant or loan scheme to switch to electric vehicle</i>	<i>Ensure that other smaller pollution issues are dealt with appropriately and consider potential implications of any measures introduced.</i> <i>Make all the enormous cycle lanes smaller, as this is adding to traffic congestion and not justified by the amount of cyclists using them and how much space is required for a BIKE.</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. Lewisham Council will continue to work with TfL to improve public transport provision where possible. Cycle lanes are designed to guidance and cannot be made smaller.	No change to the plan. The draft plan included an action (19.1) to work with all relevant organisations to improve air quality on strategic roads. This would include TfL. Consultation is part of the process of delivering the schemes outlined as part of the Cleaner Transport category. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WH2W-T a resident		<i>I don't own a car and walk wherever possible.</i>	<i>Advise me about solar panels</i>	Advice will be available on our website and the Energy trust website at https://energysavingtrust.org.uk/advice/solar-panels/ . This will be considered during our air quality campaigns.	No changes needed.
ANON-1JDS-WH24-Q a resident	<i>The measures are far too conservative. They reflect a desire to monitor the situation and provide education, and are somewhat tokenistic, rather than anything decisive that will address the issue. The measures proposed are not proportionate to the scale or urgency of the issue that needs to be tackled.</i> <i>- there needs to be a rapid expansion of air quality monitoring to ensure equitable coverage across the borough, ensuring that every nursery and school has a dedicated monitoring device outside. The measurements should be available in real-time via an app and the website. Only then will we be truly able to assess the impact (or lack of impact) of the measures being introduced</i> <i>- where the council is unable to prioritise provision of monitoring devices, local residents should be offered the opportunity to purchase these and have them installed by the council</i> <i>- there should be a borough-wide speed limit of 20mph</i> <i>- LTN zones should be abolished with immediate effect as this simply increase pollution in other areas. There is widespread and growing opposition to these measures, which serves to undermine all other efforts to tackle air pollution</i> <i>- the frequency of train and bus timetables should be increased to encourage use of public transport</i> <i>- residential and commercial parking permits for vehicles other than hybrid/electric should be increased significantly to encourage changes in behaviour and car ownership, and to subsidise introduction of a more robust air quality monitoring network</i>		<i>Offer a free indoor air quality assessment to all residents on an annual basis</i>	The comment made about free indoor air quality assessment for residents has been noted and will be consider when funding become available. The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. A borough-wide 20mph speed limit came into effect in September 2016, not including roads managed by TfL. Air Quality monitoring has been expanded and priority is given to install further monitors to measure areas to meet new WHO targets. The comments about monitoring around sensitive receptors are already under consideration (see Table 4.1) and will be implemented in due course.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH2Y-V a resident	<i>It is unclear what you mean by 'major' developments. This isn't fully transparent. What constitutes 'major'? Also, I missed where 'school superfine' is clearly defined. More needs to be done to reduce traffic such as introducing more road furniture to deter driving through residential areas and enforcing speed limits. This will make the roads less hospitable to people making unnecessary short journeys in their cars and more hospitable to pedestrians. There is so much speeding in the borough. Driving should be made to be an unpleasant experience that prioritises pedestrians first, and the cyclists. More needs to be done to delineate the space that is for use by pedestrians and use by cyclists. For example, putting a cycle lane adjacent to a play park for small children is dangerous poor planning as is making pedestrians and cyclists share a path. Has the council investigated encouraging the use of motor-assisted cycling for local deliveries?</i>	<i>We, family of five, do not own a car. We try to use the trains and buses minimally for local needs. We walk with our small children to school/nursery. We holiday at destinations that can be reached by public transport.</i>	<i>We would need a financial incentive to upgrade our boiler, which is already low emission.</i>	A major Development is considered where there are 10 of more dwellings or an area larger than 0.5 hectares. Our local plan will include a definition of what constitutes a Major development, also defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015. School superZones are areas designated to create healthier areas for children to live, learn and play, with at least one new project per year. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Lewisham remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Regarding grants for boilers, contacts should be made with the energy trust Government scheme (ECO3) 2018 supporting heating measures. see https://www.workworkltd.org.uk/?gclid=EAlaIqobChMI04PV9Jyi9AIVGLLtC	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH2E-8 a resident	<i>The council's proposals are weak. There's a lot of emphasis on measurement, a lot of reliance on measures delivered by legislative or GLA requirements, and otherwise it's mostly just warm words and aspirations.</i>	<i>I'm an environmental professional, so I have a good understanding of the issues.</i>	<i>Proper transformative improvements to cycling infrastructure to allow me and my family to safely cycle in the borough.</i>	Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Lewisham remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.

ANON-1JDS-WH22-N a resident	<i>More should be done on EV infrastructure for residents</i>	<i>Improve home energy efficiency and change heating fuels Switch to an EV</i>	<i>I would welcome a large increase in EV chargers as I would like an EV but cannot own one with so few public charging points available. Companies like char.gy and Ubitricity are now expanding significantly and provide an opportunity for the borough to greatly increase local charging points. In my view each residential street needs a charger and these need to be placed with a dedicated restricted parking space. Ultimately Lewisham will need around 1000 small chargers, up from the current 100, if all demand is to be met. It will be difficult to own an EV without this for those of us with no driveway.</i>	We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location. Public charging points can be found on the Lewisham website.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH2V-S a resident	<i>Once you have the monitoring infrastructure in place, what will you do to reduce the PM2 etc? It's all very well knowing it's high but it's the action as a result.</i>	<i>Walking or using public transport instead of driving my car. Reporting drivers who are idling their engines.</i>	<i>Cycle lanes - I would cycle more if I wasn't afraid of the traffic I have to cycle next to.</i>	Agree that safety can be an issue for people. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all, including healthy neighbourhoods and cycle parking.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH23-P a resident			<i>Listen to all residents, and remove LTN's which have significantly increased congestion and idling, improve public transport.</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH2T-Q a resident	<i>It's good to focus on air pollution around schools but I would like to see it monitored/ addressed more around health care settings such as hospitals/ hospice/ homeless hostels/ care homes etc. Improved insulation of residential properties reduces the amount of fuel for heating in winter and cooling in summer. Flat roof tops with poor insulation exacerbate this as do buildings with lots of glass windows. I'd like to see a pledge where no new builds have lots of glass windows without some measures to mitigate the heat that comes through the glass. As climate increases I think we need to look more to the Mediterranean approach where by screening is outside the glass. I'm speaking from my own current circumstances.</i>	<i>Yes but I don't think there a huge amount more I can do. Currently no car, mindful to try to manage electric/ gas use. A bike lock up would help me so I can get my food shopping and rely less on delivery.</i>	<i>I live in one of 5 blocks on High Level Drive, Approx 210 flats. There is little space to keep a bike and bringing it through the flat and down in the lift is not ideal. I would like to use my bike for small trips to the supermarket but it's too much trouble and hard work. The nearest bike lock ups are a bit too far away for me with my disability. I rely on a weekly van delivery instead but would like to reduce this.</i>	We will raise these issues with the CCG, NHS, joint commissioning team & planning team. For bike lock ups, we will raise this with the transport team. Monitoring around sensitive receptors has been considered by LBL as presented in Table 4.1.	No changes needed.
ANON-1JDS-WH2H-B a resident	<i>Increasing areas of green space further and protecting green space from mis-use. Making all new developments include adequate green space for each individual housed.</i>	<i>Not having a car and walking/cycling where possible. Reducing my energy use at home.</i>		This will be incorporated in our Local Plan.	No changes needed.
ANON-1JDS-WH21-M a resident		<i>Virtually nothing. This issue can only be tackled at a municipal level.</i>	<i>Employ someone who actually understands how to manage traffic in the borough. Stop idiotic developments like the one by Lewisham station. Hundreds of flats literally metres away from one of the busiest roads in the borough. I will do it for free.</i>	Our Local plan is being compiled and this comment will be considered.	No changes needed
ANON-1JDS-WH2B-5 a resident			<i>Stop closing off roads in the borough. You are penalising drivers unnecessarily and just causing other roads to be at a stand still because of it.</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.	No changes needed
ANON-1JDS-WH2Z-W a resident	<i>Drivers without garages at home will have difficulty charging electric vehicles. Many people cannot afford electric vehicles. The problem from idling has greatly increased since the introduction of bus lanes. These have caused traffic to slow down and cause jams which enforce idling and cause vehicles to be on the road for much longer than they used to be when 2 lanes were available to keep traffic flowing.</i>	<i>I understand and there is nothing I can do as using a vehicle is essential for me.</i>		Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Anybody can apply for an electric charging point, it does not require the ownership of a garage. Each site will be assessed individually.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH26-S a resident		<i>Use non polluting forms of transport</i>		LBL encourage sustainable transport.	NA
ANON-1JDS-WH2F-9 worker in Lewisham	<i>This survey is not accessible to me as a disabled person. I feel that the needs of disabled people should have been given more thought when designing the survey.</i>		<i>Consult with the community properly. Consult in an accessible way using easy access well known techniques Contact people via the Mayor e-mails to resident Send an e-mail to all employee. This survey was difficult to find Explain things in the emails - don't assume knowledge like "pm" Explain the urgency, that a child has died because of poor air quality in Lewisham.</i>	Comments noted. Disabled people and other vulnerable groups are given priority during most interventions taken by LBL to reduce air pollution. LBL is aware that as action is taken some groups may need particular support. Some evidence-based actions may also disproportionately affect some groups of people. The issues will be given further considering during the course of the AQAP.	No changes needed.

ANON-1JDS-WH2M-G other, please specify:	<i>The high level of traffic that is moving through the borough. Not about filtering them through areas that create wider congestion but a wider campaign with London as a whole to support less traffic using the borough as a throughway.</i>	<i>Less use of my vehicle but I don't like to cycle in the borough as do not feel safe with level of traffic so usually determine to walk or get the bus as an alternative. Sometimes for time reasons this is not viable so I do have to revert back to using my car.</i>	<i>Make sure housing associations provide their residents with information on energy saving. I have a shared ownership house newly built 5 years ago (second owner) and there is no information on the solar panel system in the house. No one can tell me firstly if I am using it correctly and secondly how/if I am making savings; my bills certainly have not gone down!</i>	Agree with comments. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH2C-6 a resident	<i>Continued home building in the borough raises air pollution due to increased population and none of the plans address why residents use vehicles. There are no plans or policies to increase employment within the borough or a hire local policy so that more residents live and work within a walkable or bikeable distance. There is no plans or policy to increase train frequency (or national plan to lower the costs of using public transport). Covid has brought a huge surge to online shopping and there are no plans to try to decrease delivery vans such as reinventing shopping areas or Amazon style lockers for say whole roads/blocks of flats to share to tackle single delivery issues. As the borough has major routes into London there are no plans to decrease traffic that passes.... So I personally feel that the wider picture of looking at why there's so much traffic has not been considered.</i>	<i>Drive less. (Already have a low emission car with start/stop so doesn't run idle when in traffic). No coal/wood burning.</i>	<i>Be clear in its goals but with a realistic view of why people drive and solutions to change.</i>	Agree that delivery hubs could be researched within Lewisham, this could reduce the need for many delivery vehicles. Agree that joint approaches are needed with neighbouring boroughs and TfL to reduce traffic through the Borough and London.	Lewisham are ensuring that exposure in amenity spaces is considered at the design stage and as part of the Air Quality assessment for new development and redevelopment proposals. Lewisham are holding a public transport liaison committee in January 2022 which would be an opportune time to raise this point, however the financial impacts and reduced demand may mean that the operators are not keen to provide more services. Lewisham supports the ULEZ and has pushed for the expansion to cover all of Lewisham to reduce through traffic of larger vehicles. Reducing car use is one of the best ways to cut emissions. Sustainable Travel Towns
ANON-1JDS-WH2U-R a resident				No comment.	NA
ANON-1JDS-WH2A-4 a resident		<i>Using public transport, walking where suitable, using zipcar etc. rather than owning a vehicle, never idling when using a vehicle, minimising home deliveries when shopping, not having barbecues or outdoor fires, avoiding use of gas boilers / hobs where possible.</i>	<i>Work with car clubs to increase the number of bays and electric/hybrid vehicles available, increase the number of publicly available vehicle charging points, work with TfL to review bus route suitability.</i>	The Borough has several car club bays provided by Zipcar, but more emphasis from Lewisham could encourage electric vehicles in the car club.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH1D-6 a resident	<i>Seems to be low consideration of green infrastructure or green spaces, parks and planting to help improve air quality as well as provide nicer, greener, cleaner areas</i>		<i>More, safer, bike lanes. More cycle storage. More road humps/chicanes (Kirdale area in Sydenham especially). More green spaces, park areas and tree planting</i>	Agree with comments on cycling amenities and infrastructure. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. The Strategy for Parks & Open Spaces prioritises healthy streets and green spaces in Lewisham. Our Parks/open spaces and our local plan presents measures to increase green infrastructure across the borough.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH1N-G a resident	<i>Not all of us can walk or cycle especially when carrying shopping - there should be more priority given to public transport if car use is to be reduced. In the meanwhile, car use should not be penalised by removing car parking. More campaigns and financial help to support people to switch to electric cars would also help.</i>	<i>Make more short journeys on foot and make my next car an electric one.</i>	<i>Put pressure on TfL to improve public transport. Support Bakerloo line extension. More support, including financial support, to help people switch to electric cars.</i>	Communication with TfL is key and Lewisham fully support the extension of the Bakerloo Line. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time.	No change to the plan. The draft plan included an action (19.1) to work with all relevant organisations to improve air quality on strategic roads. This would include TfL. Consultation is part of the process of delivering the schemes
ANON-1JDS-WH1R-M a resident		<i>I cycle to work everyday.</i>	<i>Provide advice on energy-efficient boilers and provide grants to incentivise residents to upgrade old/inefficient appliances. Lewisham Council also needs to do more to tackle the burning of garden waste. I have made several complaints to the Council about neighbours burning their garden waste (including plastic waste) and nothing has been done about it.</i>	The comments made on energy plant have been passed on to the Climate resilient team and the issue raised on waste to the waste management team for action. Under the Governments ECO3 Scheme, Eligible home owners could have their old inefficient/Broken boilers replaced completely free of charge, or heavily subsidised. If you qualify, we can arrange your free boiler replacement done within few days.	No changes needed because the actions suggested were already being considered by LBL.
ANON-1JDS-WH1J-C a resident		<i>It is government's responsibility to regulate industry to prevent climate change. Individuals can have small impact but the only change will come from large scale and sweeping regulations. It is not the individual's responsibility to affect climate change, it is the government's.</i>	<i>Regulate industry in the borough. Incentivise green innovation in the borough, and provide training and support for workers trying to leave dirty jobs for green ones. Lead by example and be a borough of the future.</i>	LBL agree with all the proposals made. Our Park/open space/sport leisure & green scene team review LBL 2020-2025 Parks and Open Spaces Strategy and the comment made will be considered.	The intention isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads do become more congested while drivers adjust to the new layout – this was experienced in Lewisham. Schemes elsewhere have demonstrated that if walking and cycling is safer and more convenient for shorter trips, fewer people will use their cars unnecessarily. We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and

ANON-1JDS-WH1P-J a resident		<i>Walk, cycle more. Reduce car journeys</i>	<i>Lewisham council has reopened my road in The LTN causing higher traffic, speeding and size of vehicle (data by you confirms this). This is on a residential street with 2 schools The Major and staff has never responded, so to declare a climate and pollution emergency is a sick joke when you are activity poisoning residents and children by your actions. Shameful!</i>	The comments regarding the LTN are noted. In January 2022 Mayor and Cabinet improved a package of complementary environmental measures, which will seek to improve the LTN. This includes future school streets. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH19-U a resident				No comment.	NA
ANON-1JDS-WH1W-S a resident	<i>I think it is good to put a lot on effort on measuring the air quality so we can understand what's the baseline and improve from there. But the main action that would drastically help to improve the air quality issues within Lewisham is to reduce the traffic. I live close to Lewisham way and the amount of traffic through that road is too much, and it only has gotten worst over the last years. In the other hand, there are not improvements on transport links, with rail and dlr getting more and packed and saturated (side effect of the number of new developments and more people moving to the area). I understand that projects like the Bakerloo extension or the construction of a tram aren't competencies of the Council, but something needs to happen.</i>	<i>I always use public transport and don't own a car, so don't see any other ways I can help.</i>		Communication with TfL is key and Lewisham fully support the extension of the Bakerloo Line. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH1E-7 regular visitor to				No comment.	NA
ANON-1JDS-WH12-M worker in Lewisham		<i>I can use public transport to get to work. I can use my job role to try to get the council to realise that it must lead by example and real investment - not by just spinning things and reporting only the good things. We are a very bad polluter due to the state of our buildings and the lack of proper maintenance and upgrading.</i>		No comment.	NA
ANON-1JDS-WH15-Q worker in Lewisham			<i>funding</i>	Noted. This comment is not specific therefore no further actions is needed.	No changes needed.
ANON-1JDS-WH1T-P a resident	<i>I live in Forest Hill and the pollution here is mainly from car passing through Forest Hill either directly around the South Circular but also the side roads are magnets for traffic and rat-running. The stretch of the South Circular by the Station between Perry Vale and Devonshire is effectively an intersection connecting 4 routes, however the road isnt laid out to deal with the 10000s of vehicles that use the stretch every day so there is always standing traffic waiting to turn in and out of these roads. You can often taste the pollution here. Given there's no traffic lights at the end of Devonshire Road, traffic is encouraged there and a significant issue with traffic light sequences on nearby junctions is being masked. It is always better to drive through Devonshire than to use the main roads and risk the traffic lights being unkind. Further to this walking and cycling through these streets is dangerous and unpleasant so very few cyclists or pedestrians use them. I believe it would be possible to significantly improve the air quality in Forest Hill by address in the traffic that is encouraged down Devonshire Road.</i>	<i>I dont own a car, so I walk, run or cycle, or use public transport for just about every journey..</i>		Forest Hill is an Air Quality Focus Area where actions have been identified and are planned. Investigations will be undertaken to identify the issues mentioned and potential funding applied to remedy.	No changes needed as already address through a number of actions included in the plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WH18-T a resident	<i>Detail behind the cycling and walking opportunities...feels very light considering such a major area of opportunity.</i>	<i>As a non car owner, my main opportunity comes in looking at how I can use cleaner renewable energy at home and reducing my public transport use and moving more journeys to bike.</i>	<i>Be bolder. The car lobby I strong and powerful, but buckling to the noise of drivers is not going to achieve anywhere near the level of improvements needed.</i>	Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Details of individual schemes are not included in the AQAP.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WH1B-4 on behalf of a			<i>Fund any improvements needed</i>	Comments noted.	No changes needed.

ANON-1JDS-WH1K-D	worker in Lewisham	<i>Protect those most vulnerable to pollution, especially children. Prioritise infrastructure that will secure long term changes in behaviour from residents towards public transport, cycling and walking and be more robust in the enforcement of the good work already in place. For example, cameras on some school streets are not active and the streets are therefore unenforced.</i>	<i>I am a head teacher in the borough. I commute from another London borough using a combination of the train and a bike. I have a responsibility to use the good infrastructure already in place to enter and leave the borough in a responsible low or no pollution way. I also have a responsibility to support school street schemes, promote sustainable travel to school and participate in council stakeholder events, promoting the interests of children and communities.</i>	<i>As an school, the large infrastructure projects such as changing boilers or installing charging points would need to be funded by capital grants.</i>	Agree with comments. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. School Street cameras to be assessed. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.	The comments made will be considered and actioned in the redesign of the School Air Quality action plan. No changes to the draft AQAP.
ANON-1JDS-WH1Z-V	a resident		<i>More walking and cycling</i>		No comment.	NA
ANON-1JDS-WH1F-8	a resident			<i>Subsidise installation of charging points and purchases of electric cars</i>	Given the financial climate a financial incentive is not something that Lewisham are looking at for now	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH1G-9	a resident	<i>The achievements so far from lewisham council in terms of reducing traffic are negligible to be honest. Other boroughs are way ahead in this. To cite closing of a couple of (small) roads as achievements is almost embarrassing. So much more could and should be done and fast. It really doesn't transpire that this is at the top of Lewisham's agenda and it should be. To just 'declare' a climate emergency and do nothing is criminal. The leadership have a lot to answer for and are not doing enough and taking this seriously. We need to encourage people to walk or cycle and this is simply not the case anywhere in Lewisham at the moment. Very disappointing and disheartening.</i>	<i>I could reduce the journeys I make by car. In fact, I could reduce these drastically if only the roads were safe for waking and cycling with my three kids. This isn't the case unfortunately so we still use the car - even more than before as the speeding is out of control at the money. It is simply unsafe to walk or cycle with young kids</i>	<i>Provide safe roads for walking and cycling. More crossings, dropped kerbs, slow down and reduce traffic. Close roads and instal LTN and stick with those</i>	Agree with the need for safe roads and increased infrastructure for walking and cycling. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. We remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WH1M-F	a resident			<i>Help to get electric charging points for blocks of flats and local roads.</i>	We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location. Residents are encouraged to apply for electric charging points.	No changes needed.
ANON-1JDS-WH1U-Q	a resident			<i>You can start by disseminating proper factual information followed by full consultation of all Borough residents using questions with "yes" and "no" answers so that they can't be twisted and misconstrued and "interpreted" by Lewisham Borough to meet your own agenda!!! You can then deliver the decision that the Residents elected you to deliver instead of riding roughshod over the basic principles of democracy!!!</i>	The comments made have been noted.	No action needed.
ANON-1JDS-WH1A-3	a resident		<i>Help to minimise car use by providing adequate infrastructure for walking and cycling borough wide, including bike parking and storage.</i>	<i>Move from encouraging behavioural change to offering real incentives for those unaware of their impact on the environment and penalties for those unwilling to change their behaviours.</i>	The comment made has been noted. We will increase our campaign, engagement and projects to raise public awareness about the air quality issues and behaviour change.	Given the financial climate a financial incentive is not something that Lewisham are looking at for now, however Lewisham recognise that road transport is the main source of air pollution in London. We need to incentivise a change to
ANON-1JDS-WHCN-2	a resident	<i>Lewisham Council actively increased air pollution in Hither Green west of the railway by prioritisation of Hither Green east of the railway last year. There is only investment in affluent areas, car charging points Hither Green west = 3, Hither Green east = 11, at the last count. Stop always investing in the areas with more wealth.</i>	<i>No car. No wood burning fire.</i>	<i>Stop pushing traffic from wealthy areas to less wealthy areas. Ban 4*4's no one needs them in Lewisham. Ban all wood burning fires and enforce their ban. Actually enforce the clean air act rather than just talking.</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. LBL Our Crime Enforcement Regulation Service team carry out enforcement of clean air act.	No changes needed as already addressed through a number of actions included in the plan.
ANON-1JDS-WHCR-6	a resident	<i>The plan contains some good ideas but lacks specific commitments and timetables. This is such an important issue that it needs much more radical and urgent action. At a minimum this plan should align with and support the measures set out in the Council's climate action plan and transport strategy, most of which have still to be implemented</i>	<i>More cycling infrastructure. More low traffic neighbourhoods. A ban on wood-burning stoves</i>		Table 4.1 presents some timeline and is in line with our climate management plan.	No changes needed.

ANON-1JDS-WHCX-C a resident	<i>It's hard to assess the effectiveness of the proposals as there is very little detail about some of the proposed measures. E.g. the consultation says things like 'we will seek to promote sustainable forms of travel' but it doesn't say how, or it makes a commitment to introduce 'infrastructure to support walking and cycling' but no detail is provided. This makes it difficult to comment. In general this consultation suggests that Lewisham is being far less radical than some other boroughs in tackling air quality - it would be great to see some more details on the proposals.</i>	<i>I understand that I can reduce the number of journeys I make by car, reduce PM emissions from my home by burning less solid fuel and introducing energy saving measures. My husband and I do not own a car (though we could afford to) and make almost all of our journeys with our two small children on foot, by bicycle or on public transport. We use carsharing apps when we need to. We would make many more journeys by bike if cycling were safer, cycle parking better and more plentiful (especially for bike trailers) and owning an e-bike cheaper. We would like to improve the energy efficiency of our home, however the expense of upgrading our solid-wall property is considerable, so we will only be able to do this slowly and over time. We do have a wood burner, and use it roughly once or twice per week in the coldest months. We understand this is bad for air quality, but we do take care to burn the least harmful fuels, and again we would use this less if it were easier to heat our home.</i>	<i>Please just be much more radical on deterring car ownership and taking short journeys by car, as well as being much more radical to support active travel. LTNs, segregated cycle lanes on main roads and much better parking facilities for family cycling equipment (e.g. trailers, ebikes and cargobikes) would make it much safer and easier for me to travel by bike with my children. LTNs, dramatically improved road crossings, less on-street parking and reduced clutter on pavements would make it much safer and easier for me to travel on foot with my children. For example, I love to walk from my house to Lewisham high street to get the shopping etc, but the most direct route involves crossing Brownhill Road at the Torridon Rd junction. There have been so many fatalities at this junction due to the lack of a safe crossing, and it is so difficult to cross with a pram due to lack of drop-curbs that I almost always take the bus instead now. This seems such an obvious example of how the council could promote active travel in my area - I would love you to take action on this.</i>	Details of individual schemes are not included in the AQAP. However improving walking and cycling infrastructure is key to Lewisham and increasing active travel.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling. Cargo cycle parking should be researched further but not required in the AQAP.
ANON-1JDS-WHCP-4 a resident	<i>Good air quality for all is essential BUT thus needs to be implemented properly. The current attempts have been imposed, not properly thought through and poorly implemented. Maybe the current planning teams need to liaise better with the local communities as they are not doing a good job.</i>	<i>I can help by NOT pretending that the Local Council is doing an excellent job. I can also help by participating in the surveys that I am aware of. I can make the effort to keep in contact with my Local representatives BUT will they keep in contact with me?</i>	<i>Conduct proper research. Behave with integrity. Stop being manipulated by newcomers who are only interested in the area for investment reasons and who have no respect for the local residents. Also, remember that for years Lewisham has been a hub of cultural diversity, why do we feel as if we're being chased out of the area?</i>	Comments noted and forwarded to the relevant team.	No changes needed.
ANON-1JDS-WHC4-8 a resident			<i>Stop people burning wood on wood stoves, penalise those that do.</i>	Comment noted. Enforcing wood burning has been considered in the AQAP(Table 4.1).	No changes needed.
ANON-1JDS-WHCW-B a resident				No comment.	NA
ANON-1JDS-WHCY-D a resident		<i>Use my private car less. Avoid short journeys via car. Walk, cycle or use public transport where possible.</i>	<i>Provide much more physically separated infrastructure on LBL managed roads to support and enable **safe** active travel (walking, scooting or cycling). Put much more pressure on TfL to provide this infrastructure on TfL managed roads in the borough - esp. A21, A205 & Lewisham High Street. There is ample space on most parts of these roads through the borough for separated cycle lanes, for example. The lack of this in LBL - and the fact that LBL ranks lowest in London for these schemes - is a huge barrier to transport modal change. The required modal shift WILL NOT happen if people do not feel safe - and at present, it simply is not safe to cycle on roads in the borough. And without this change, motor traffic and associated emissions will continue to increase in the borough.</i>	Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Details of individual schemes are not included in the AQAP.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHC2-6 a resident	<i>We need fewer cars on the road.. public awareness campaigns should be a complement to real action. You need a radical change in public transport infrastructure and you need to make it hard and costly for people to drive. You need real enforcement and serious fines for things like idling.</i>		<i>Install lots more electric vehicle charging points. Start a decent car club scheme. More bike storage on local streets. A better LTN that covers more of the borough. Make my street safer to cross by reinstalling the LTN</i>	Agree with the need to increase EV charging points, cycle storage and improvements to the car club. We remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them across the borough and will ensure that residents are involved in shaping future plans. Increasing awareness with the public is noted.	No changes to the draft AQAP. Comments noted and already considered in the draft plan.

ANON-1JDS-WHCV-A	a resident			<i>Be stronger re ltms</i>	We remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them across the borough and will ensure that residents are involved in shaping future plans.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHCV-9	a resident	<i>The main sources of pollution are stoves and transport. The plans don't include anything concrete to tackle these... just lots of nice words. As with the LTN in Lee Green where they removed filters as soon as anybody complains I would expect the council to cave in on extending a low emissions zone etc...</i>	<i>Better air quality data on a website - not an unreliable app that does not seem to be available</i>	<i>Better cycling infrastructure including hangers for on street storage. Where a cycling route has been identified (e.g. Leahurst Road) the council should not be flooding it with cars (e.g. as has happened with the so called revised LTN). The council could also make it easier to walk by removing parking spaces from pavements (e.g. Lee Road and Longhurst</i>	Agree with the need for better cycling infrastructure. We remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans. The comments on the LTN are noted and are addressed in the report presented to Mayor and Cabinet in January on that scheme. Parking on pavements is an issue through the Borough and greater investigation is required.	The comments about monitoring around sensitive receptors are already under consideration (see Table 4.1) and will be implemented in due course. No changes needed to the draft AQAP
ANON-1JDS-WHC3-7	a political representative	N/A	<i>Use public transport and walk and also have changed to hybrid car.</i>		No comment.	NA
ANON-1JDS-WHCT-8	a resident	<i>No monitoring of pollution on roads with extra traffic dumped on them by LTNS</i>		<i>Install more EV charging points, don't charge residents for installing at home</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. Lewisham are installing more EV charging points across the borough but is not responsible for charge points at residents homes.	The comments about monitoring around sensitive receptors are already under consideration (see Table 4.1) and will be implemented in due course. No changes needed to the draft AQAP
ANON-1JDS-WHCZ-E	a resident	<i>Lots of action about monitoring air quality here. But the plan needs to be far more ambitious about enabling active travel and discouraging car use. We need to make Lee Green LTN permanent and start new LTN trials across the borough eg. Hither Green West. We also need more School Streets rolled out, including Lee Green which has 6 schools but no school streets. The Mayor of Lewisham said 19 more School Streets were due this autumn. Yet the plan only mentions 7 this year. We need proper segregated cycle lanes and bus lanes on all the A roads, working with TfL. We need enough cycle hangars across Lewisham to meet demand.</i>		<i>I'd like more info on heat pumps and more help to buy one affordably. Could the council organise something like the collective bidding process for solar panels?</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads do become more congested while drivers adjust to the new layout. Lewisham cannot fund EV charging points for everyone at this time. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHCF-T	a resident	<i>The greatest omission I can see is a lack of attempt to tackle air pollution on major/busy roads. I appreciate their jurisdiction lies with TfL but that's no excuse for things like lack of monitoring on them or implementing other interventions that push traffic on to them making things busier e.g. from local LTNs*. People most at risk from pollution typically live closer to busier roads; hence the plan is not tackling the issue for those who most need it. Thirdly, local educational programmes will not work for road user from outside the borough - many of whom will be using the main/arterial roads, idling etc *I realise the 'data' produced for the previous consultation on the Lee Green LTN did not show that but it was utterly flawed and confounded by the pandemic and lack of prior baseline data in the right places.</i>			The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. The comment regarding main roads is noted, but this is where strategic through traffic should be. Lewisham will continue to work with TfL to improve air quality on the main roads. Lewisham supports the extension of the ULEZ to cover the entire Borough.	No change to the plan. The draft plan included an action (19.1) to work with all relevant organisations to improve air quality on strategic roads. This would include TfL. Consultation is part of the process of delivering the schemes outlined as part of the Cleaner Transport category.
ANON-1JDS-WHCG-U	a resident	<i>I think the plan should be more ambitious in terms of greening of streets, street closures to cars, bike lane, more areas for pedestrians and for people instead of roads and car parks (similar to the area next to the Sainsbury's near Hither Green station)</i>	<i>Less driving and less use of natural gas for heating</i>	<i>More bike lanes and pedestrian areas. Promote car sharing.</i>	Agree with the comments however the details of individual schemes are not listed in the AQAP.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHC6-A	regular visitor to		<i>Walk and use public transport more; check boiler regularly</i>		No comment.	NA
ANON-1JDS-WHCM-1	a resident	<i>Other air pollutants like NOx, O3, PM10 have different sources and need their individual strategies.</i>	<i>It is very difficult to make any meaningful change to air quality as an individual. Highlighting personal responsibility is a common strategy deployed to shift blame away from failing policy. The fact is that a significant reduction in air pollution in Lewisham will require policy change way beyond the personal contribution of individuals. E.g through traffic in the borough</i>	<i>Lewisham has to force change and mitigate hardship drastic actions are causing</i>	The comments made have been noted. We will increase our campaign, engagement and projects to raise public awareness about the air quality issues and behaviour change. About designing individual strategies has been noted. The different air pollutants should be considered and tackled together. They are rarely independent of each other, either in their production or resulting exposures. Interventions to reduce individual pollutants should not be considered in isolation from other pollutants, otherwise reducing harm from one may be countered by an increase in another. However, each borough is declared as AQMA for specific pollutant and our strategies are based on the LLQM scheme designed by the government. The GLA has recently begun public engagement on two pieces of London Plan Guidance – the Air Quality Neutral (AQN) guidance and the Air Quality Positive (AQP) guidance. GLA set up an engagement portal where you can access the documents, sign up to events and submit your responses via the survey – https://consult.london.gov.uk/air-quality-neutral .	No changes needed.

ANON-1JDS-WHCC-Q	a resident	Speeding has a significant impact on emissions of traffic. There is a significant issue with speeding and a consequent enforcement of 20mph speed limits would significantly cut emissions of traffic. Many streets see 75+% of all traffic drive above speed limits. It's highly doubtful that the proposed changes will bring air quality in line with the new recommendations of the WHO. It's going to be too little too slow and people will actually die as a consequence	I don't own a car, I cycle walk and take public transport. I have upgraded my central heating and insulated my house.	The council shouldn't not wait for meaningful individual change. Even though it might be unpopular the council has to take more drastic action to reduce pollution, in particular from traffic, in hot spots.	The new recommendation made by WHO will be considered and adopted during the course of this AQAP. Responses to the comments made on our proposed transport/highway/parking interventions are provided in the transport AQ specific policy statement attached to this report. Speed limit enforcement is undertaken by the Police. Public health has been working closely with the Environmental Protection team on anti-idling work with the pan-London project on anti-idling project being funded by the Mayor of London. Parking is carrying out enforcement via Civil Enforcement Officers (CEOs). A Traffic Management Order has been made, so Penalty Charge Notices (PCNs) can be served. All parking enforcement team now wear hi-vis jackets with 'anti-idling' campaign icon daily. At the point of engine idling, CEOs will first approach motorists and ask to switch off the engine or move. If after 5 mins of the observation period, the motorists do not comply, the CEO will enforce by issuing a PCN.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHCS-7	a resident		Reduce the use of personal vehicle	Make it easier and cheaper to install electric vehicle charging points, for example if a new connection from the mains electricity network under a public highway is needed, then work easily with and support UKPN to make it cheaper for residents, if the installation specifically includes electric vehicle charging points at the same time. Work with TfL to improve cycle facilities and cycle safety along the length of the South Circular across the borough - at the moment it is very sporadic and this puts me off cycling more regularly along the South Circular, which forms the majority of my daily commute.	Given the financial climate a financial reduction is not something that Lewisham are looking at for now.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHCA-N	a resident	Reduce car parking options. And encourage council worker etc to use alternative transport. Dis encourage use of cars by increasing cpz E.g. in Culverley green conservation area, , which is permanently used as a council and commuter car park	We already use mainly alternative transport and have had out house insulated	Start at their own house and reduce their workers to use their cars and create cpz in Culverley green conservation area to discourage free parking	Agree that Lewisham could encourage employees to partake in active travel where possible to show a good example. When resources allow a staff travel plan will be explored further.	No changes to the draft AQAP. Comments noted and already considered in the draft plan.
ANON-1JDS-WHXQ-T	a resident	1. How to improve transport connections across south east London (bus and train routes) so that people don't take Uber's / drive - it is usually easier to get from Hither Green into central London than from Hither green to Deptford 2. The difficulty with promoting cycling in polluted environments - I think more people would be more happy to cycle if there were fewer vehicles on the road and if the air was cleaner - more focus on creating safe cycle lanes (Dutch style). I know this doesn't solve all of the issues, but perhaps tree planting along main roads (eg Catford Broadway, or through New Cross) would go some way to making the environment feel more pleasant to cycle through?	I would benefit from information about indoor air quality and home improvements which can improve this - leaflets or billboards	- negotiate bulk discounts with trusted suppliers e.g. if X% of residents on a given road can replace their boilers to be low emissions, the whole road will have a discount on supply/install - likewise for indoor air quality professionals - continue to disseminate information to all residents on air quality and small / inexpensive changes that can be made - make the roads safe for cycling - provide more places to lock bikes up	Comments noted and these will be considered when funding become available. Agree with the need for better cycling infrastructure, the aim is that with better infrastructure will come a reduction in pollution as more people turn to active travel. Improving public transport is a key area and communication with TfL is a priority for Lewisham. Under the Governments ECO3 Scheme, Eligible home owners could have their old inefficient/Broken boilers replaced completely free of charge, or heavily subsidised. If you qualify, we can arrange your free boiler replacement done within few days. Addressing indoor air quality and air quality campaigns are already considered in the AQAP. Advice and guidance on indoor pollution and how to tackle it will be provided on our website. The A beginner's guide to indoor air quality can be consulted at https://www.thebesa.com/news/who-campaigner-backs-beginner-s-guide-to-indoor-air-quality/ .	No changes to the draft AQAP. Comments noted and already considered in the draft plan.
ANON-1JDS-WHXN-Q	a resident				No comment.	NA
ANON-1JDS-WHXI-K	a resident	Look at how domestic waste is disposed of and close the incinerator	As someone that doesn't drive or have an open fire I don't understand what I could do	Nothing these things should be coming from national government and real emphasis should be on business that are the major polluters	This comment was forwarded to the waste management team for consideration in their strategy.	No changes needed.
ANON-1JDS-WHXX-1	regular visitor to Lewisham				No comment.	NA

	a resident			<i>Clear all LTN roadblocks.</i>	Lewisham Council's long-term transport strategy and climate commitments support a shift away from private car use. Sustainable modes of travel such as walking, cycling and public transport are encouraged. Fewer than 50 per cent of Lewisham households own a car, but we are all affected by poor air quality, congestion and noise pollution. The LTNs are a part of achieving this.	No changes needed
ANON-1JDS-WHXP-S	a resident	<i>You have wilfully increased the air pollution throughout Lewisham by introducing the LTNs in Lee. This has caused constant traffic tailbacks on the densely populated roads surrounding the boundary. This has caused a huge amount of idling traffic and high volume of traffic jams on fewer roads. This is not only an ill conceived premise but social injustice at its worst. There should be a tick box to remove the LTNs as this joke of a consultation is clearly heavily skewed to the reintroduction of all LTNs again at the expense of the majority of your constituents so the wealthier minority gets clearer air. FYI, pollution travels...</i>		<i>Immediately remove the LTNs. I might then consider cycling but it's currently far too dangerous to do that on the boundary roads</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. Agree with increasing safety for cyclists.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHX9-2	regular visitor to Lewisham				No comment.	NA
ANON-1JDS-WHX4-W	a resident	<i>The introduction of LTNs should have been accompanied by more education and information. It wasn't and the result is that it has been hijacked by many people putting out disinformation. Basically LTNs are a good weapon in the arsenal to improve air quality.</i>			Comments are noted and will be applied in roll out of future schemes.	No changes needed
ANON-1JDS-WHXY-2	a resident				No comment.	NA
ANON-1JDS-WHX2-U	a resident	<i>By introducing ulez to south circular you have made my Road Horncastle Road a rat run as it runs parallel and all vehicles large and small use it 24/7 now; can you please address this before someone gets run over</i>	<i>I would like to stop traffic using my Road as a cut through as it is now a car park in rush hour and the pollution is unbearable; we have to keep our windows closed at all times can you please help</i>	<i>Simple, all you need to do is make my Road one way and you would stop it being a rat run; the top half of Horncastle Road belongs to Greenwich council and they made it one way years ago, they seem to be way ahead of you when it comes to pollution</i>	Horncastle Road could be investigated to see the implications of a one way. ULEZ is a TfL scheme that Lewisham supports, and we would like to see the expansion to the entire Borough.	The expansion of the Ultra-Low Emission Zone (ULEZ) is discussed in action 21.2 and other possible local projects to reduce emissions on major roads will be given consideration. Lewisham support the expansion of the ULEZ to cover the entire Borough.. No changes needed
ANON-1JDS-WHXE-E						

<p>a resident</p>	<p><i>'Encouraging' motorists not to idle their engines and relying on the public to report idling will not do much to tackle the problem. You need targeted pro-active enforcement at schools and other hot-spots.</i></p> <p><i>It is unacceptable that people are still incentivised to drive into our town centres with free parking outside of the very limited CPZ areas (and limited hours in those areas). The Council should urgently prioritise the rapid roll-out of Controlled Parking Zones across the entire borough to tackle this problem.</i></p> <p><i>The Council should also crack down on the widespread illegal parking in developments that were given planning permission as 'car-free'.</i></p> <p><i>Pavement parking (both legal and illegal) is widespread in many parts of the borough, actively discouraging walking. The Council should hand out fines to those who park on footpaths illegally, and adopt a policy to reduce the number of designated parking space on footpaths every year.</i></p> <p><i>The Council should also identify areas where the number of on-street parking spaces can be reduced, ideally replacing them with bike lanes or planting.</i></p> <p><i>Low-traffic neighbourhoods have been shown to reduce emissions and increase levels of walking and cycling. The Council should show leadership by rolling out LTNs across the borough.</i></p> <p><i>Lewisham currently does the worst of any Inner London borough on the Healthy Streets Index, due among other reasons to its very poor provision of cycling infrastructure. It should urgently increase the amount of safe cycling infrastructure on key routes with low-cost interventions such as wands.</i></p>	<p><i>Cycling and taking public transport more would improve air quality, but the Council needs to do much more to incentivise these choices by (a) improving cycling infrastructure and (b) making buses more reliable by taking more cars off the road.</i></p>	<p><i>Reduce traffic in the borough by removing parking spaces at both origins and destinations, and charging more for the remaining parking spaces.</i></p> <p><i>Crack down on the widespread illegal parking in developments that were given planning permission as 'car-free'.</i></p> <p><i>Hand out fines to those who park on footpaths illegally, and adopt a policy to reduce the number of designated parking space on footpaths every year.</i></p> <p><i>Roll out Low Traffic Neighbourhoods across the borough.</i></p> <p><i>Increase the amount of safe cycling infrastructure on key routes with low-cost interventions such as wands.</i></p>	<p>Parking on pavements is an issue through the Borough and greater investigation is required. There are 25 CPZs currently in Lewisham but Lewisham are supportive of installing new CPZs where required. Agree with safe cycling infrastructure being installed, details of individual schemes not included in AQAP. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Development parking to go to Development Management. Removal of parking spaces is sensitive and each location would be analysed before any removal.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
<p>ANON-1JDS-WHX5-X a resident</p>	<p><i>Given that air pollution is killing people, the measures in the proposed plan seem like too little too late. We don't allow people to smoke in workplaces (certainly not schools or nurseries), but there's a sense that it's fine to drive wherever you like, to idle with the engine running, despite the fact that these are really selfish and anti-social behaviours.</i></p> <p><i>Before the smoking ban, it was annoying being in a smoky bar, but I could choose to avoid that space. But I can't avoid going shopping on Rushey Green, or walking from Lewisham Station home, because that's my life. So why should I be exposed to dangerous levels of pollution? Why on earth is there a multi-lane motorway running through Lewisham town centre? It is like building a town, but leaving a putrid open sewer in the middle of it. It's disgusting walking along that road, you feel like you're choking.</i></p> <p><i>There is no enforcement of anti-idling, and it scary to cycle. The rights of motorists trump those of all other citizens, and their needs are prioritised above everyone else, because they are a vocal (and wealthier) demographic.</i></p>		<p><i>Separate, safe provision for push-bikes, e-scooters, skateboards etc. These are very viable ways for people to get from A to B, but most people won't use them if they have to share roads with cars.</i></p> <p><i>Idling and other anti-social behaviours (like illegal parking) need to be much more actively cracked down on (not through some kind of phone line). Sticking up a few posters is not enough, and posters and other information campaigns need to much more hard-hitting. It feels like the council are too scared to confront motorists with the real consequences of their behaviour.</i></p> <p><i>New schemes that are built (which are meant to be car free) need to actually be car free - or to have a limited amount of parking for people who really need it. There is no point making rules and then not enforcing them.</i></p> <p><i>A principle of all transport policy should be to protect pedestrians and residents from harm. Exposing pedestrians, residents and school children to high-levels of pollution is a known harm. Why aren't roads immediately closed to traffic when they reach dangerous levels of pollution? Why do the preferences of motorists always come first? Why should we suffer and become ill despite the fact that we are just</i></p>	<p>Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Focus areas have been identified as having high levels of pollution and human exposure. Lewisham are looking to undertaken a number of projects in the area. It is not a case of closing a road when it reaches a certain level. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
<p>ANON-1JDS-WHXV-Y</p>					

ANON-1JDS-WHX3-V	a resident	<i>This will not hit net zero targets by 2030. It isn't radical enough, relies too much on electrification and there's not enough focus on cycling/walking/LTNs/reducing the convenience of using cars / increasing public spaces. Why not make cpzs automatic unless enough people opt out? Lewisham's record on these is the worst in London, it costs you nothing, stop making driving/polluting so convenient. Cycling infra in Lewisham is shamefully poor - in the high st area you've reshaped the landscape and made it worse, it's dominated by cars and it's dangerous. Bus waiting areas are in the most intense traffic areas. This plan is so watered down it is pointless. You could convert far more carparks to housing which is so badly needed. You will see an increase in population but car ownership cannot increase - there's no space so creating housing & reducing car ownership should complement each other, Far more communication is needed to discourage driving / promote bikes and walking. You are not taking this seriously - the death of Ella should lead to a huge change in strategy but this isn't it. Needs a much broader review and more of a concerted focus on achieving net zero targets, not this lipservice. Also wildlife/vegetation/trees affect air quality - where's the promise to protect our oxygen and wildlife in the form of ancient trees/green spaces from developers?</i>	<i>Not driving, campaigning for LTNs/against car ownership / using only an electric taxi - avoid any car usage if possible / installing heat pumps or other non-gas heating / using (electric) public transport / buying local products. Not using a wood burner or burning wood/other at all. Campaigning for CPZs/cycling and walking infrastructure and against increased road usage projects eg Silvertown tunnel. Protecting green spaces / trees / ancient trees / planting new trees as much as possible (eg Stfl)</i>	<i>Communicate these issues much more broadly to all residents. Reinroduce lee LTN & LTNs across the borough especially on school streets and in the centre of lewisham (high st). Make new cross single not double traffic lane and put in cycle paths. Subsidise non gas boilers massively. Make cpzs opt out not opt in with voting. Make carparks into new homes. Improve all cycling infrastructure with separate cycle paths lanes across the borough. Promote bicycle borrowing/more cycle hangars (free!) and cargo bike lending, launch a big marketing campaign and don't be swayed by right wing non resident bullies.</i>	We remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Therefore active travel is promoted with improvements to walking and cycling infrastructure. Regarding grants for boilers, contacts should be made with the energy trust Government scheme (ECO3) 2018 supporting heating measures. see https://www.workworkltd.org.uk/?gclid=EAIaIQobChMI04PV9Jy9IAIVGLlTC h2IRgxAEAAAYAAEgIdAvD_BwE and https://www.gov.uk/improve-energy-efficiency . The Strategy for Parks & Open Spaces prioritises healthy streets and green spaces in Lewisham. Our Parks/open spaces and our local plan presents measures to increase green infrastructure across the borough.Cargo cycle parking is been implemented in lewisham as part of the Clean Air Villages 4(CAV4) project (accessible via the following webpage https://crossriverpartnership.org/projects/clean-air-villages-4/)	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHXT-W	a resident		<i>Have you considered offering incentives? Everything to date seems to be penalties. For example a reduction in council tax for doing certain clean air activities? How about closing some roads on a Sunday to allow mass cycle participation? Making cycling safe is key to getting people out of their cars.</i>	<i>Grants to make doing the things above cheaper. Change all the red road closure signs to green ones. Have live road-side air pollution displays.</i>	All signs on the Highway are compliant with the Traffic Signs Regulations and General Directions, therefore the colours of signs cannot be changed. Grants are not something that Lewisham are promoting currently.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHXH-H	a resident			<i>Make sure actions speak louder than words. So far I have not been convinced that you are really prioritising the climate emergency as much as you tweet/state about. Impactful change much be the order of the day NOT tokenistic adjustments. Extending LTNs would surely have a big impact on reducing air pollution and I would like to see this happen starting with Hither Green West.</i>	Comment noted. Please read our actions to deal with climate change at https://lewisham.gov.uk/myservices/environment/making-the-borough-carbon-neutral-by-2030-climate-emergency-declaration	No changes needed.
ANON-1JDS-WHX1-T	a resident				No comment.	NA
ANON-1JDS-WHXZ-3	a resident	<i>Constructing new buildings creates more pollution than refurbishing/retrofitting existing ones. I would therefore like to see Lewisham reflect this in the decisions it makes on planning applications. And if new buildings have to be built at all, low carbon construction materials should be used - e.g. timber instead of concrete. Promoting the use of electric vehicles is all very well, but unless the electricity is generated 100% renewably, pollution is still being created somewhere. People need to be using less energy overall (as the current energy crisis illustrates), so I'd like to see less emphasis on electric cars and more emphasis on using public transport. Switching to 100% renewable electricity in council buildings is a good start, but it would be good if Lewisham residents could ne encouraged to do this in their own homes too.</i>	<i>Continue what I'm already doing - e.g. walking or using public transport to get around, never burning anything, not smoking, minimising my electricity usage, using a renewable energy supplier, buying things in shops rather than having them delivered by a polluting vehicle, only buying things that haven't been produced in a polluting way (where possible) and aren't damaging to air quality.</i>		The issues raised are being considered in our new Local Plan.	No changes needed.
ANON-1JDS-WHXF-F	a resident	<i>not allow residents to smoke (cigarettes or weed) next to others' homes</i>	<i>not use a car; use renewable energy providers</i>		This comments has been passed on to our Crime Enforcement Regulation Service (CER) who deals with antisocial behaviour. The Police should also me made aware of the issue.	No changes needed.
ANON-1JDS-WHXG-G	a resident		<i>I walk everywhere- only use public transport if it is not possible to walk, and never drive or use taxis/Uber. I don't heat my home. I volunteer with local environmental projects.</i>		No comment.	NA

<p>a resident</p>	<p><i>You don't seem to have any real strategy, just a collection of ideas varying from obvious to useless. The most sensible point you make is willingness to work with other councils and organisations, because this is a big issue crossing borough boundaries and there are limits to what Lewisham can do alone.</i></p> <p><i>In particular, the extreme negativity to private car use is not a solution. Rapid rollout of electric cars will make a big difference to air pollution.</i></p>	<p><i>We use a small car, avoid needless journeys, and our next car will be electric or plug in hybrid.</i></p> <p><i>The effect of the LTN is to increase my journey distance and increase time spent stuck in congestion - net effect increases the air pollution I create by driving. Don't tell me to reduce driving because I already did that by my own choice before the LTN came along.</i></p> <p><i>The LTN is probably increasing overall air pollution as well damaging ordinary lives. Some middle class people in leafy roads may be better off, but the pollution has just been displaced. Lee has a serious problem with commuter traffic and rat running, so fix that rather than targetting ordinary people.</i></p> <p><i>Also it is damaging the bus service - I can see all the buses turning around Dorville/Cambridge/Upwood. How is that consistent with reducing traffic pollution?</i></p> <p><i>People need to get on with their lives, and the LTN interferes with that. If you really want to reduce genuinely local traffic then you need to make it easier for people to find alternatives. This is not the same as blocking rat running, which you can do</i></p>		<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Therefore active travel is promoted with improvements to walking and cycling infrastructure.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
<p>ANON-1JDS-WHX7-Z a resident</p>	<p><i>Most of these proposals are way, way too weak - only a £300 fine for breaking the law on burning materials? Businesses won't even blink at that, and see it as a minor inconvenience. You will only 'promote' sustainable transport to building developers, and 'consider' enforcement action against polluters?! Come on! The time for 'considering' and 'promoting' is over - polluters must pay, and in amounts that force them to change their behaviour.</i></p> <p><i>There is not nearly enough emphasis on improving public transport, walking and cycling, and severely reducing car use. Only those who can demonstrate the need a car for work, disabled people or those caring for disabled people should be driving in London. The rest - tax the *** out of them! And just say no parking to all new developments! Then use the tax to subsidise public transport/ bike lanes etc. Your proposals are dancing round the edges rather than boldly tackling the massive issue of private car use blighting Lewisham/ London/ the world. This is not the 20th century anymore: we have to recognise that (non-electric) car use is not a personal choice or right, it is causing disease, death and environmental catastrophe (not even an exaggeration).</i></p> <p><i>Finally, and specific to Lewisham, there are serious issues with road crossing in central Lewisham that need to be rethought urgently to give pedestrians priority. The whole area from the station to Glassmills to the police station to the entrance to the shopping centre car park is absolutely terrible for pedestrians - the lights change way too slowly (from the station to Glassmills feels like it takes 5 minutes); we are expected to double back on ourselves (e.g. crossing from the central building site to the market); have to cross three roads instead of one (e.g. at the corner of Belmont Hill and Lewis Grove); cross dangerously without a green light (ditto, also the entrance to the shopping centre car park), and all the while breathing in noxious fumes. It's really bad, and I hate taking my children to central Lewisham for that reason.</i></p>	<p><i>Not owning a car. Carrying my shopping home from a shop on foot.</i></p>	<p><i>Personally, I do not contribute to air pollution so I don't need help.</i></p>	<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Therefore active travel is promoted with improvements to walking and cycling infrastructure. Details of individual projects are not in the AQAP. The concerns regarding pedestrian crossings in central Lewisham are noted. The locations specifically referred to are TfL's responsibility, but we will work with them to try and bring about improvements. The £300 fine is imposed by the government as detailed on the following website https://www.gov.uk/government/news/restrictions-on-sale-of-coal-and-wet-wood-for-home-burning-begin.</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
<p>ANON-1JDS-WHGV-E</p>					

<p>a resident</p> <p>ANON-1JDS-WHXA-A</p>	<p><i>I think it is great that Lewisham is taking air pollution seriously, but for those of us long-term residents who live near or on the South Circular, there is a huge elephant in the room that is not being addressed. The pollution coming from the South Circular and the other main roads, which are also residential, often by the poorer residents of the borough, was made much worse by the LTN. The monitoring of air pollution on these roads was inadequate, and the whole process has become overly politicised. Congestion at intersections has increased dramatically, and fatalities have resulted.</i></p> <p><i>The initial consultation online for the LTN concluded that 80% of respondents did not want the LTN to be permanent, but this was ignored. The Council's response to the latest consultation on the LTN has not been announced, and there is a genuine fear that logic will not prevail. Those of us residents dedicated to environmentalism, fighting climate change, fighting air pollution, while bringing the community together, have been really set back by the council's single-minded installation of the LTN that makes air pollution and congestion much worse for vulnerable populations and nearby residents, and has torn the community apart in many ways. You talk about fighting idling, but when you are caught in traffic for essential journeys, you cannot turn off your engine while moving forward a few feet at a time. You talk about school streets, but the LTN actually drove congestion and traffic past Trinity school, not away from it. Brindishe Manor School has always needed better traffic management on its adjacent roads, but instead the residents are allowed to park on both sides, while people waiting for the gates to open are endangered daily. And yet Leahurst is blocked further up, preventing traffic from moving along towards Lewisham Hospital, and creating a dangerous potential for head-on-collisions for Ambulances and disabled drivers who are told they are allowed to use the road in both directions. Essential journeys that used to take 5-10 minutes now involves detours, congestion, and stopped traffic, literally tripping the fossil fuels burned and time wasted.</i></p> <p><i>In addition, why is there little mention about plantings, trees, hedges, green screens, and utilising other technologies to try to capture air pollution and fight climate change at the same time? There have been some good initiatives, such as around Torrigan</i></p>	<p><i>I think the Council needs to listen to residents and work with us, not against us, including the many moderate groups in the discussion, such as the One Lewisham: Healthy Streets for All initiative. Otherwise the community is torn apart, and the Council's initiatives will not fully succeed, despite admirable aims.</i></p>		<p>The comments about monitoring around sensitive receptors are already under consideration (see Table 4.1) and will be implemented in due course. Agree with the increase in tree planting where possible. The comments on the LTN are noted and addressed in the January 2022 Mayor and Cabinet report. Under the Governments ECO3 Scheme, Eligible home owners could have their old inefficient/Broken boilers replaced completely free of charge, or heavily subsidised. If you qualify, we can arrange your free boiler replacement done within few days. Addressing indoor air quality and air quality campaigns are already considered in the AQAP. The Strategy for Parks & Open Spaces prioritises healthy streets and green spaces in Lewisham. Our Parks/open spaces and our local plan presents measures to increase green infrastructure across the borough.</p>	<p>An explanation have been provided and no further action is warranted.</p>
<p>a resident</p> <p>ANON-1JDS-WHNC-G</p>	<p><i>Stop pushing LTNs on to us and making boundary roads much more polluted - all roads in the borough should be treated the same</i></p>			<p>The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout.</p>	<p>No changes needed</p>
<p>on behalf of a</p> <p>ANON-1JDS-WHNI-9</p>	<p><i>New developments should be insulated to passiv haus standards with sustainable energy like ground source, green roofs and green space Decommissioning SELCHP BANNING HGVs from LBL roads Final mile delivery collection points Putting pressure on river traffic pollutants Enforce existing planning regulations</i></p>	<p><i>Encourage electric vehicle use with free charging from one provider like TFL used to I have had an electric car for 12 years and would appreciate a subsidy</i></p> <p><i>Promote 100% renewable like Good Energy or the council becoming a provider.</i></p> <p><i>Enforce the ban on bonfires, barbecues and wood burning in private homes in period houses</i></p>	<p><i>Have a robust enforcement of Air Quality policies to make a level playing field</i></p> <p><i>Grants, subsidies and incentives</i></p> <p><i>Allow use of empty shops and buildings for collection of deliveries to individual households. This would save us on individual deliveries thereby cutting use of vehicles and petrol</i></p>	<p>The comments are generally pertinent. The SELCHP is regulated by the Environment Agency that should be consulted. The comment about decommissioning the SELCHP was forwarded to the waste management team for consideration in their strategy.</p>	<p>No changes needed.</p>
<p>a resident</p> <p>ANON-1JDS-WHNI-Q</p>	<p><i>Commitment to installing electric car charging points across the borough - this is key to getting people to switch to EVs</i></p>		<p><i>Install EV charging points across the borough</i></p>	<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. We are planning to install more EV charging points across the Borough, we encourage residents to apply for a EV charging point at their home.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>

ANON-1JDS-WHCU-9	on behalf of a	<p>Part of this response was devised in collaboration with Climate action Lewisham members so their will be some repetition, but this response has been tailored to reflect the specific problems in SE23.</p> <p>Congratulations on achieving a downward trend in pollution levels in Lewisham. The draft strategy is promising and The Forest Hill Society's Campaign for Clean Air SE23 welcomes these measures. However, given that tyre/break wear accounts for over half of particulate pollution, we have general concerns that the plan is too focussed on switching to electric vehicles rather than promoting a switch to active transport and the plan will therefore not achieve the new WHO PM guidelines. https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions.</p> <p>We recommend the further measures below.</p> <p>MONITORING</p> <ul style="list-style-type: none"> - Adopt the new lower WHO guidelines for Nox and Pm2.5 issued on 22.9.21. Quote the most recent guidelines in the report and change the strategy accordingly. - Lewisham monitoring complies with standards which involves looking at annual mean data. In addition to this, because risk to health is cumulative, Lewisham should also look closely at the daily highs and lows to give a more detailed picture to residents about actual exposure and times and when to avoid roads e.g. what is risk of exposure at rush hour/school pick up times when people are out and about. Share this data in strategy and reports. -Consider partnering with Dustbox to undertake "citizen science" community science monitoring (University of Cambridge/Goldsmiths) to improve picture of PM 2.5. They have already undertaken monitoring in Forest Hill and Deptford/New Cross. https://dustbox-logbook.citizensense.net/ <p>TRANSPORT</p> <ul style="list-style-type: none"> -Work with TFL to ensure the provision of regular train services which have declined 	See above. Making Active Travel choices, insulating Homes, refraining from burning is most important.	See Q 4 above. Main things is to make active travel more attractive by making better infrastructure for pedestrians and cyclists especially across the A205. and linking up wards to avoid this dangerous road.	LBL agree that active travel is better than switching to other motorised forms of transport.	The Mayor of London has adopted a target to meet limits for PM2.5 by 2030 (i.e. annual mean concentration of 10 micrograms per cubic metre of air (µg m-3)) and asked boroughs (as detailed in the document named 'PM2.5 in London: Roadmap'), to meet WHO guidelines by 2030, which Lewisham are following. The five real-time air quality monitoring sites in Lewisham can be accessed by all on the Lewisham website at https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels . Residents can sign up for airText alerts which is a free service providing air quality alerts and forecasts. Dustbox is a potential avenue for pollution monitoring but not something that Lewisham are actively pursuing currently. Lewisham are holding a public transport liaison committee in January which would be an opportune time to raise this point, however the financial impacts and reduced demand may mean that the operators are not keen to provide more services. The ULEZ means that buses need to adhere to low emissions, however this is under TfL remit. TfL's 9000 strong bus fleet meet or exceed the cleanest Euro VI emission standards. Lewisham will undertake Idling Action Events/workshops and enforcement around schools. Lewisham will report back to the GLA on review and outcome of the campaign to discourage idling. All parking enforcement team now wear hi-vis
ANON-1JDS-WHN9-R	on behalf of a	<p>Climate Action Lewisham welcome the measures in the AQA plan. Given that tyre/break wear accounts for ove half of Particulate pollution, we have general concerns that the plan is too focussed on switching to electric vehicles rather than promoting a switch to active transport and the plan will therefore not achieve the new WHO PM guidelines. https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions</p> <p>We recommend the further measures below.</p> <p>MONITORING</p> <ul style="list-style-type: none"> - Adopt the new lower WHO guidelines for Nox and Pm2.5 issued on 22.9.21. Quote the most recent guidelines in the report and change the strategy accordingly. - Treat 2020 AQM results as an anomaly due to the pandemic: e.g. NO2 rates declined at roadside by 25% from 45.3 to 34.0 between 2016-2019, rather than the quoted 43% from 45.3 – 23.5 between 2016-2020 which gives an overly optimistic picture. - Lewisham monitoring complies with standards which involves looking at annual mean data. In addition to this, because risk to health is cumulative, Lewisham should also look closely at the daily highs and lows to give a more detailed picture to residents about actual exposure and times and when to avoid roads e.g. what is risk of exposure at rush hour/school pick up times when people are out and about. Share this data in strategy and reports. <p>TRANSPORT</p> <ul style="list-style-type: none"> -Work with TFL to ensure the provision of regular train services which have declined since the pandemic. If people have to wait double the time for trains (e.g. the Catford/Orpington Train & Victoria Loop Line) they will inevitably drive instead. This is devastating for people who do not drive and rely on these services. Regular and reliable existing train links are imperative to get people to switch to public transport from their cars, especially post-covid. The timetables should be at least as good as pre- 	More eye-catching flyers and information guides, promotional material produced by Lewisham for us to distribute at community events to help everyone understand how to contribute.	See Q 4.	Please refer to the response to the statutory questions/responses.	See the statutory questions and responses.
ANON-1JDS-WHXW-Z	a resident			Lobby government to make allow more incentives for electric cars. They are still too expensive for a family on a one income medium salary. Make provision for more cycle lanes	Lewisham would support any Government incentives for electric vehicles. Agree with the provision for more cycle lanes, which is the plan to increase active travel in the Borough.	No changes to the final AQAP because the points made have been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.

<p>a resident</p> <p>ANON-1JDS-WHN4-K</p>	<p>I think this is probably the absolutely bare minimum the council could do and shows very poor ambition. There needs to be much more change and enforcement. Gentle 'encouragement' through posters and community groups does not work, this is a waste of money. The council could do so much more.</p> <p>- Upgrade its entire fleet of borough vehicles to electric only (this would have to go hand in hand with better EV charging infrastructure).</p> <p>- The Smoke control measures are pointless and ineffective. so many people have bonfires and have installed wood burners - the only way to stop or control this is through effective enforcement. Same with vehicle idling - this is a major problem across the borough and the only way to tackle it is enforcement through fines and reduction of parking bays on high streets.</p> <p>The most effective way of changing behaviour is to make a better and easier option - this means making driving HARDER and make cycling and walking EASIER. To do this driving needs to be discouraged by removing parking and closing roads to allow for walking and cycling only.</p>	<p>not driving!! I cycle or walk almost everywhere - but cycling could be so much easier and safer if there were dedicated segregated cycle lanes and removal of obstacles (such as bike barriers and cyclist dismount signs) - Cycling needs to be a viable alternative to commuting for average people - this means it needs to be easy and fast.</p> <p>I already have a low emission vehicle but would LOVE an electric vehicle however the biggest factor stopping me is there isn't the infrastructure for me to rely on it - i dont have a driveway so would need on street charging points and would need to guarantee I could charge it when i needed to. My nearest is the Sainsburys in Bell Green which has only TWO charging points/bays out of approx. 2000 and they're always being used.</p>	<p>It can LEAD BY EXAMPLE! change your polluting diesel fleet to fully electric! Get staff to cycle or walk - remove council parking at council buildings etc</p> <p>It can improve cycle infrastructure massively - its still so poor - work with LCC and people who actually cycle every day in the borough. Cycle paths and route that are well kept (no potholes, no tree roots, no large puddles and blocked drains, good clear signage), no cycle barriers or dismount points, direct and easy routes - preferably flat. Remove car parking bays on highstreets and replace with segregated lanes! Many more bike parking posts and CCTV cameras covering them.</p> <p>It can massively improve EV charging infrastructure - install hundred more ultra fast charging points and make sure every car park has at least 10-20% of bays with charging points (we need to make this move to electric now!)</p>	<p>We will increase the ULEV in council owned fleet by 80% by 2022 and the whole fleet will be zero emission by 2030. Agree that Lewisham could encourage employees to partake in active travel where possible to show a good example. Individual active travel schemes are not included in the AQAP but the aim is to increase active travel infrastructure. Agree with encouraging a shift away from car ownership but this will take a long time and a huge modal shift. We are planning to install more EV charging points across the Borough, we encourage residents to apply for a EV charging point at their home.</p>	<p>Lewisham recognised the need to reduce emissions within its own fleet, as set out in AQAP to lead by example and increase the no. of ULEV in council owned fleet by 80% by 2022 and the whole fleet will be zero emission by 2030. The Cycle Strategy which feeds into the AQAP clearly prioritises a shift away from car use. It aims to increase cycling numbers from 600,000 to 1,500,000 by 2026. We will build on the work already undertaken in relation to encouraging cycling and walking. Lewisham have a plan for a number of cycle routes through the Borough, all information can be found at https://lewisham.gov.uk/inmyarea/regeneration/ Deptford/north-Lewisham-links/cycling-quietway Healthy Neighbourhood Programme (including low traffic neighbourhoods) will be rolled out across the borough, subject to funding. The first Healthy Neighbourhood Cell will be Lewisham, Hither Green and Lee Green. These measures can be divisive which is why everybody has the opportunity to comment on the proposals during all stages of the schemes. The School Streets initiative has seen physical measures introduced to these streets to stop car use during school drop off and pick up times. The scheme also aims to tackle congestion, improve air quality at the school gates, make it easier and safer to walk and cycle to school and create a friendlier and calmer environment for everyone. So far, 26</p>
<p>a resident</p> <p>ANON-1JDS-WHNW-P</p>	<p>Should be much more emphasis on enabling and prioritising Active Travel and Public Transport use. Actively deterring private motor vehicle use. Encouraging people to move to active travel or shared electric vehicle use. Need to reallocate road space from parked personal motor vehicles to walking and cycling. Also needs a strong emphasis on distribution hubs using electric cargo bikes and electric vans to consolidate local deliveries and reduce duplication of polluting van deliveries.</p>	<p>Reduce motor vehicle use and keep using active travel modes. Reduce wood burning Improve home insulation</p>	<p>Improve cycling infrastructure to make back-steeet routes continuous with traffic reduction measures along their length and safe crossings of main roads. Provide fully segregated cycle lanes along all main roads in the borough. Provide more convenient cycle parking in all local shopping areas and secure cycle parking at major transport hubs Air Quality Champions and Anti-Idling campaigns are only going to be successful if there is legislation to support them and the council are prepared to issue PCNs when the rules are broken. Just talking to people is not enough. Car clubs providing small low emission vehicles should become the norm for those that need personal motorised transport so drivers should be actively deterred from private ownership of vehicles. This would release precious road space currently used for parking for pedestrians and cyclists.</p>	<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Individual scheme details are not included in the AQAP. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. The Borough has several car club bays provided by Zipcar, but more emphasis from Lewisham could encourage electric vehicles in the car club. Last mile delivery hubs are an area for Lewisham to look into. The comment made about Air Quality Champions and Anti-Idling campaigns have been noted.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
<p>a resident</p> <p>ANON-1JDS-WHNY-R</p>	<p>Enforce 20mph would also help. Push cars onto main roads</p>	<p>Rarely make car journeys</p>	<p>Much more to enforce people idling and people speeding</p>	<p>Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Speed enforcement is undertaken by the Police.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>

	a resident		<i>I don't own a car, and try to take as many trips walking as possible. I wish I could cycle, but I live on the A2 which feels incredibly dangerous and polluted. I also take in compost through an app so that my neighbors without gardens have access to compost their food waste instead of disposing of it in the rubbish.</i>	<i>Install more bike lanes! Introduce the bike sharing programme into Lewisham- right now friends visiting me from other boroughs can only cycle as far as Southwark before needing to switch to a bus. I absolutely back the Bakerloo extension, and hope that means the A2 that is New Cross Road goes on a diet and is made much more pedestrian and cycle friendly.</i> <i>Although I understand electric cars are better than regular cars, it is awful to see so much infrastructure and money being spent on cars, when the same money could go much further in helping the majority of us who don't have cars. I hope to have a child in the next few years, and the idea of walking them along Lewisham Way and New Cross Road to get to school doesn't matter if those speeding vehicles are electric, it still makes it unfriendly.</i>	Lewisham fully supports the extension of the Bakerloo Line. Lewisham are exploring cycle hire procurement to implement a permanent cycle hire scheme, assessing providers and will likely run a trial. Increasing cycle infrastructure is key, although individual scheme details are not included in the AQAP.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHN2-H	a resident	<i>Provision of EV charging won't help with the thousands of cars commuting into Lewisham everyday because it is one of the easiest and cheapest places in inner London for commuters to park. Borough wide CPZ coverage is critical to stop Lewisham being used as a giant free car park.</i>	<i>Avoiding driving wherever possible and never burning solid fuel at home.</i>	<i>Improve walking and cycling infrastructure and mandate more parking for car clubs whilst adopting and enforcing borough wide CPZs with car club exemptions.</i>	There are 25 CPZs currently in Lewisham but Lewisham are supportive of installing new CPZs where required. Lewisham supports the expansion of the ULEZ to cover the entire Borough. The Borough has several car club bays provided by Zipcar, exemptions will need to be assessed.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHNH-7	a resident	<i>Think there should be far more public education re the health hazards of car pollutants. Think that council should have been tougher on schools such as St Philip Neri when there new-build appeared to disregard the pollution children would be exposed to by having main entrance on busy road. They also removed a screen of trees which would have offset some of the pollution.</i>	<i>Walk more and use public transport rather than my car. Only burn seasoned wood and avoid unnecessary burning. Plan how to improve the heating of my house more sustainably with a low emission boiler or ground pump if affordable.</i>	<i>Subsidise replacement greener types of heating. Maintain a good bus service. Install more charging points for electric vehicles.</i>	The comments have been passed on to the relevant teams for action.	no changes to this plan.
ANON-1JDS-WHNT-K	a resident				No comment.	NA
ANON-1JDS-WHN8-Q	a resident	<i>More notices at schools and nurseries to tell people they will be fined for leaving their car idling</i>	<i>I have reduced my car use to twice a week only I use buses or walk when I can. I tell people parked with engine running that the fine is £80.</i>		Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. LBL will erect non idling signs around schools as necessary and will continue taking enforcement actions if necessary.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHN1-G	a resident			<i>Please make information (on what council is doing on improving air quality) more accessible and more visual to the residents - There is no use presenting these information on the council website only.</i> <i>Council should be seen at the forefront of tackling air quality issue. This means more communication, more marketing, more presence of staff / officer in public views. Right now there is no visibility on all the good effort that the council has made.</i>	This comment was forwarded to the communication team for action.	No changes needed.
ANON-1JDS-WHNK-A	a resident	<i>1 - Waste management across the borough needs to be improved. There is no proper control over recycling bins and waste maintenance. 2 - Cyclelanes need to be considered as a priority, for example at New Cross Road and Pomeroy street</i>	<i>I personally cycle around London, but it happens that I don't feel safe on my own borough. I find some other areas of the city much more prepared for people to cycle and walk safely.</i> <i>I separate waste, but for example, I have never received the organic bin I've asked for. And also, I can see a successful waste management re recycling and general waste?</i> <i>I personally think that introducing Low Traffic Neighbourhoods across Lewisham would improve the borough significantly.</i>		The comments have been passed on to the relevant teams for action.	No changes to this plan.
ANON-1JDS-WHN5-M	a resident		<i>I don't drive so already I'm doing well. I cycle and walk as much as I can. And encourage others to do so</i>		No comment.	NA
ANON-1JDS-WHNZ-S					No comment.	NA

	a resident	<p>(1) In my opinion although the actions of single London Borough Councils are necessary for the prevention and control of locally generated pollution, they cannot do anything about air pollution deriving from outside the Borough, including other countries. Does Lewisham employ any scientists who are able to assess the relative contributions of local and external pollution according to weather conditions? Is any estimate even possible?</p> <p>(2) No Council or government can consider air pollution in isolation from measures to address climate change. For example, what is the Council doing to encourage car-owning families NOT to pave over their front gardens in order to avoid residential car parking fees? I have never seen any helpful suggestions on this topic. It is well known that high density paving over front gardens increases city temperatures with detrimental effects in summer. It is less well known that plants, especially hedges can absorb pollutants from vehicle emissions as well as being beneficial in fighting climate change and promoting biodiversity.</p> <p>My intention in bringing up the above two points is that actions often have unintended consequences. For instance pushing up residential parking charges is counterproductive in other ways. The same is true when Lewisham Council shuts off roads in certain (usually posher areas) with the intention of reducing road pollution whereas the obvious unintended consequences is to simply divert the pollution to another (usually poorer neighbourhood). My observations and those of others suggest that the Council often lacks joined up thinking.</p>	<p>This is demeaning question that sets out only to interrogate residents about their knowledge of poor air quality which shouldn't be the objective of this exercise. As a scientist, I can assure the Council that I fully understand my contribution to tackling poor air quality. I would reverse the question and ask the Council do they understand that certain of their recent actions are not helping.</p>		<p>(1) LBL would consider such types of modelling when the right funding becomes available. (2) Air pollution is not considered in isolation because the GLA/DEFRA oversees and fund London wide air quality projects. The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads do become more congested while drivers adjust to the new layout.</p>	<p>The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. Schemes elsewhere have demonstrated that if walking and cycling is safer and more convenient for shorter trips, fewer people will use their cars unnecessarily. They may also decide not to make certain trips, to travel at quieter times, switch to public transport or combine trips. However, this takes time to take effect.</p>
ANON-1JDS-WHNF-5	a resident			<p>Be much bolder on walking, cycling and low carbon travel infrastructure</p>	<p>Agree with comments, Lewisham are looking to improve walking and cycling infrastructure. Individual scheme details are not included in the AQAP.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
ANON-1JDS-WHNM-C	a resident	<p>There is far too little emphasis on promoting safe and healthy travel. Lewisham already has a pitiful and embarrassing record in providing cycle lanes. The provision of cycle parking is awful too.</p> <p>There needs to be a move to electric vehicles in combination with this.</p> <p>It is all far too little to improve air quality</p>		<p>Lewisham needs to start a campaign to get people to install low emission boilers and give funding support to encourage this.</p>	<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Therefore active travel is promoted with improvements to walking and cycling infrastructure. Details of individual projects are not in the AQAP. Under the Governments ECO3 Scheme, Eligible home owners could have their old inefficient/Broken boilers replaced completely free of charge, or heavily subsidised. If you qualify, we can arrange your free boiler replacement done within few days. Addressing indoor air quality and air quality campaigns are already considered in the AQAP. Regarding grants for boilers, contacts should be made with the energy trust Government scheme (ECO3) 2018 supporting heating measures. see https://www.workworkltd.org.uk/?gclid=EAlaIqobChMI04PV9Jyi9AIVGLLTC h2IRgxAEAYAiAAEgIdAvD_BwE and https://www.gov.uk/improve-energy-efficiency.</p>	<p>No changes needed as already address through a number of actions included in the plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
ANON-1JDS-WHNC-2	a resident	<p>I think there should be more focus on maintaining trees in the borough as these are important for improving air quality.</p>	<p>You could help by making more and better cycle lanes.</p>	<p>Please make it safer to cycle.</p>	<p>Agree with comments, Lewisham are looking to improve walking and cycling infrastructure. Individual scheme details are not included in the AQAP. The Strategy for Parks & Open Spaces prioritises healthy streets and green spaces in Lewisham.</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
ANON-1JDS-WHPD-5	a resident			<p>provide financial support</p>	<p>Lewisham are looking to install more CPZs and LTNs. The Healthy Neighbourhood Programme (including low traffic neighbourhoods) will be rolled out across the borough, subject to funding.</p>	<p>No changes needed.</p>
ANON-1JDS-WHPQ-J	regular visitor to Lewisham				<p>No comment.</p>	<p>NA</p>
ANON-1JDS-WHPR-K	a resident	<p>There is nothing about decreasing motor traffic in the Borough, especially important are high levels of commuting through the Borough.</p> <p>There is little but warm words about creating safe active travel spaces: cycle lanes, well maintained, parking free pavements, car free/minimised streets (eg LTNs)</p> <p>What happened to the 'cycle spine' through the Borough?</p>		<p>School streets LTNs Protected cycleways (as part of a network, not just going to a roundabout then stopping) Stop pavement parking Make commuting through routes less attractive (close roads to motors) Actively seek out and block rat running cut through Make cycling safe for school commutes</p>	<p>Parking on pavements is an issue through the Borough and greater investigation is required. Collaboration with TfL will benefit all and is important to Lewisham. Lewisham remain committed to the outcomes that LTNs aim to achieve and we will continue to explore how best to achieve them and will ensure that residents are involved in shaping future plans. Lewisham are looking to improve walking and cycling infrastructure. Individual scheme details are not included in the AQAP. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
ANON-1JDS-WHPJ-B	a resident	<p>I would like to see nurseries included in the school air quality planning. My son attends Faith Montessori nursery on Stanstead Road, which is part of the South Circular. It is a great nursery but I am concerned about his exposure to air pollution from the main road. It would be great if nurseries like his could get support to plant a</p>	<p>I walk and cycle where possible and would like better infrastructure to encourage active travel.</p>	<p>Offer advice and support to my local nursery to plant and maintain an effective green barrier.</p>	<p>Nurseries are included in the school action plan.</p>	<p>No changes needed.</p>
ANON-1JDS-WHPP-H						

ANON-1JDS-WHP9-T	regular visitor	<i>There is too much reliance on the hope that electric vehicles will solve everything and nowhere enough focus on supporting active travel which has a far greater positive impact.</i>			Electric vehicles are an area that Lewisham see as assisting the AQAP, alongside increasing active travel infrastructure. Individual scheme details are not included in the AQAP.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHPW-R	worker in Lewisham			<i>Assess best practice and emulate. Invest to assist with behavioural change. Do not wait and refocus.</i>	The comment made has been noted. We will increase our campaign, engagement and projects to raise public awareness about the air quality issues and behaviour change.	No changes needed.
ANON-1JDS-WHPY-T	a resident		<i>- not drive - not burn stuff - not use coal/wood for heating - encourage cycling</i>		No comment.	NA
ANON-1JDS-WHPE-6	a resident	<i>I'm worried that the changes you've made have reduced air quality around poorer areas - ie, with the low traffic neighbourhoods. (I'm not against them as such - we all need to get out of our cars more but they've reduced traffic and air pollution in middle class areas but not poorer areas.)</i>	<i>Videos, mayor's email, social media etc can all be used to let us know what we can do (other than getting out of our cars).</i>	<i>More electric charging points.</i>	The intention of LTNs isn't to move traffic from one place to another, but to reduce the number of unnecessary car journeys. During the settling in phase of a scheme like this, surrounding roads are likely to become more congested while drivers adjust to the new layout. Lewisham are looking to install more EV charging points where feasible.	No changes to the final AQAP because the point made has been considered in the draft plan.
ANON-1JDS-WHP2-K	on behalf of a business/organisation/institution/community group/authority				No comment.	NA
ANON-1JDS-WHP5-P	on behalf of a business/organisation/institution/community group/authority		<i>reduced speed levels moving to low emissions no burning of fossil fuels</i>		No comment.	NA
ANON-1JDS-WHPV-Q	a resident	<i>What is unclear is the level of funding available and engagement with local organisations and communities. At a time when so much is cut, stretched and overworked. How will this be different?</i>	<i>I now work from home and use my car much less. I walk more and am getting more confident cycling where possible or using public transport. I avoid using heating or have it on a lower setting. I avoid having a coal fire. My car has a small engine and low petrol use. I don't idle when waiting. I shop local where possible</i>	<i>- easy access to information - pool information about national or other schemes - alerts when the weather keeps in pollution - more individualised action to problem solve with people who continue to drive their children to school and idle outside - address the chronic traffic on the south circular</i>	Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles.	Public health has been working closely with the Environmental Protection team on anti-idling work with the pan-London project on anti-idling project being funded by the Mayor of London. Parking is carrying out enforcement via Civil Enforcement Officers (CEOs). A Traffic Management Order has been made, so Penalty Charge Notices (PCNs) can be served.
ANON-1JDS-WHPT-N	a resident				No comment.	NA
ANON-1JDS-WHPH-9	worker in Lewisham			<i>More info about what air quality champion entails, and where to get smokeless fuel More segregated cycle lanes to encourage people to cycle</i>	More information will be made available on our website. This is already under consideration during our upcoming Air quality campaign.	No changes needed.
ANON-1JDS-WHP1-J	worker in Lewisham		<i>Hopefully my employer will introduce a salary sacrifice scheme for vehicles so I could get an electric or hybrid vehicle through the scheme</i>	<i>Encourage local businesses (perhaps by leading by example) to offer staff ways of purchasing a low or zero emission car.</i>	Given the financial climate a financial incentive is not something that Lewisham are looking at for now.	No changes to the final AQAP because the point made has been considered in the draft plan.
ANON-1JDS-WHPK-C	a resident		<i>Reduce my travel by car, walking and cycling rather than public transport</i>	<i>Promote the use of electric cars more, install more charging points. Add more planters to the borough and reduce heavy goods through traffic from other boroughs</i>	Lewisham supports the extension of the ULEZ to cover the entire Borough. Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Lewisham will encourage electrical vehicle uptake. Planters in the Borough should be investigated.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHPB-3	worker in Lewisham			<i>Fund initiatives properly and see them through</i>	Comments noted.	No changes needed.

ANON-1JDS-WHPZ-U	a business ow	<i>Cars could be discouraged by higher taxes and fuel costs. A bigger awareness campaign of how deadly car emissions are. Hard hitting ads warning of the impact we are making on climate change by one short journey by car etc Too much focus is on schools and lower income households (for energy schemes) This affects everyone</i>	<i>Selling my car. Operation so I can walk more easily Recycle everything, rarely buy new. Spend time educating others in the community. Saving water. Use rainwater for many tasks and work Use heating sparingly Switched to LED lights Using a trolley to transport gear by foot Etc</i>	<i>Reductions for outlay for these provisions, including wifi so less travel is needed. Even 10% off a boiler etc Events, festivals, that preach the zero Carbon message Penalise car use Give bonuses and rewards (eg free gym passes) for businesses who go car free Vegan events to get everyone reducing carbon</i>	Comment noted and under consideration during the course of the plan. Responses to the comments made on our proposed transport/highway/parking interventions are provided in the transport AQ specific policy statement attached this report.	LBL transport AQ specific Policy Statement.
ANON-1JDS-WHPF-7	a resident				No comment.	NA
ANON-1JDS-WHPM-E	a resident		<i>I do but I am constrained by the lack of a decent and affordable bus network and a massive lack of electric charging points. This lack of charging points is what is stopping me getting an electric car.</i>	<i>More charging points or maybe if someone has an electric vehicle then have their own bay outside their house similar to a disabled bay.</i>	We are planning to install more EV charging points across the Borough, we encourage residents to apply for a EV charging point at their home. We review EV charging sites based on requests submitted by residents for new charge points, along with information on areas of likely high demand, proximity to existing charge points and as we identify each potential location.	No changes to the final AQAP because the point made has been considered in the draft plan.
ANON-1JDS-WHPC-4	a resident	<i>There's so little on traffic reduction. All you want to do is replace petrol/diesel vehicles with electric ones. There'll still be congestion and the borough will be unattractive for people wanting to walk and cycle</i>			A combination of methods are looking to reduce traffic in the Borough, including cycling and walking infrastructure and healthy neighbourhoods.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling
ANON-1JDS-WHP6-Q	a business ow	<i>Segregated cycle highways in Deptford alone is not ambitious enough</i>		<i>Partially fund them. Direct us to professional support.</i>	Improvements to cycling infrastructure is not limited to Deptford, we are looking to improve active travel infrastructure across the Borough	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHPU-P	a resident	<i>Encourage more use of public transport by ensuring that there are more frequent services.</i>			Public Transport services should be referred to TfL. We are positive in communications with TfL.	No change to the plan. The draft plan included an action (19.1) to work with all relevant organisations to improve air quality on strategic roads. This would include TfL. Consultation is part of the process of delivering the schemes
ANON-1JDS-WHP7-R	a resident	<i>Having read the report I am surprised there is no mention of planting street trees. There is a mass of data to show that street trees mitigate pollution, slow traffic, reduce urban heat islands (and use of aircon), reduce localised flooding, foster well being, encourage community engagement, encourage walking, encourage biodiversity, and bring many more benefits.</i>	<i>Work to plant more street trees Retrofit my home where possible Walk not drive Buy sensible food, use less plastic</i>	<i>Make a greener borough - change grey spaces into green spaces. Work to create green corridors across the borough for those who want to walk.</i>	The suggestions will be considered in our Local Plan and our park/open space strategy.	No changes needed.
ANON-1JDS-WHPG-8	a resident	<i>All busses should be fully electric all taxis and taxi services should be fully electric. We need pedestrian zones in Lewisham central to discourage driving</i>		<i>Pedestrianise my road, discourage by enforcing resident only parking 24/7</i>	There are currently no plans for pedestrian zones in Lewisham currently, but this could be investigated in future. TfL's 9000 strong bus fleet meet or exceed the cleanest Euro VI emission standards. The Mayor's aims are for all taxis and Private Hire Vehicles (PHVs) to be zero emission.	No changes needed
ANON-1JDS-WHPA-2	a resident	<i>Do more to discourage driving in Lewisham, especially through traffic</i>	<i>Not owning a car. Using public transport and walking</i>	<i>Enforce speed limits on neighbourhood roads Reduce incentives to drive cars (eg stop privileging parking spaces over pavements and green spaces)</i>	Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Parking on pavements is an issue through the Borough and grater investigation is required. Speed limit enforcement is undertaken by the Police.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.

<p>a resident</p> <p>ANON-1JDS-WHPS-M</p>	<p><i>Re: connecting people through community engagement, the greatest changes will come from those not already engaged in the community. Those who are already interested in checking air quality alerts, or have signed up to a community-focussed app (airtext?) have already taken steps towards making changes. I am in frequent contact with people who are completely uninterested in improving air quality (or other aspects of their local area), I don't know if this is through ignorance or disenfranchisement, but if you work out a way to engage this section of the population then you will surely see a shift in people's adoption of positive air quality practices. Eg. Frequent idling awareness/walk to school campaigns at the school gates. Identifying 'park and stride' options for schools (this would also work towards Lewisham's drive to reduce obesity and increase activity in children). Also, a big omission is the role of electric bikes and scooters. I don't enjoy the way that many of the scooters are ridden, but I do believe that they will be pivotal in getting people out of cars. By overlooking the role that they currently play, we're ignoring the impact they could make. They're not going to go away. So better that we embrace their use, improve their safety and see them a step towards sustainable travel.</i></p>	<p><i>I know that there are various aspects of my life that contribute to poor air quality. I drive, however I try to do so as little as possible, even if that means toting me and the kids in head-to-toe waterproofs to brave the lashing rain on a 25min walk to school. I understand that to improve air quality I will be inconvenienced. But the satisfaction of knowing I am making a contribution to improving air quality outweighs this inconvenience. I understand that, looking at the bigger picture, my inconvenience is incredibly minor. The car we have is old and diesel - the worst kind! I live next to the border of the ULEZ extension, it will impact on where I have occasionally driven to. But I welcome the extension. I cannot yet afford an electric car and I know the most environmentally aware thing to do is to only replace my existing car when it is beyond repair. Our electricity supply is 100% renewable (octopus) and we are considering replacing our gas hob and oven with electric/induction alternatives to reduce our gas consumption.</i></p>	<p><i>Make any actions as cheap as possible/free, otherwise you rule out a large proportion of the borough being able to participate.</i></p>	<p>The comments made have been noted. We will increase air quality information to the public, campaign, engagement and projects to raise public awareness about the air quality issues and behaviour change. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Lewisham are exploring cycle hire procurement to implement a permanent cycle hire scheme, assessing providers and will likely run a trial. Increasing cycle infrastructure is key, although individual scheme details are not included in the AQAP. School campaigns will be investigated further as there is evidence to show that children can influence their parents travel habits.</p>	<p>We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric cars) as far as possible. We are committed to making Lewisham carbon neutral by 2030, as set out in Lewisham's Climate Change Action Plan. Although the overall aim of our transport strategy is to encourage more walking, cycling and public transport journeys, we also recognise the need to support the use of electric vehicles for essential car journeys. Reducing car use is one of the best ways to cut emissions. Sustainable Travel Towns studies show that car driver distance could be reduced by five to seven per cent, which can provide large reductions in NOx/PM emissions. The Cycle Strategy which feeds into the AQAP clearly prioritises a shift away from car use. It aims to increase cycling numbers from 600,000 to 1,500,000 by 2026. We will build on the work already undertaken in relation to encouraging cycling and walking. Lewisham have a plan for a number of cycle routes through the Borough, all information can be found at https://lewisham.gov.uk/inmyarea/regeneration/deptford/north-lewisham-links/cycling-quietway. Public health has been working closely with the Environmental Protection team on anti-idling work with the pan-London project on anti-idling project being funded by the Mayor of London. Parking is carrying out enforcement via Civil Enforcement Officers (CEOs). A Traffic</p>
<p>a resident</p> <p>ANON-1JDS-WHMD-2</p>	<p><i>I think the language used around transport and parking is far too moderate considering the scale of the issue. As a pedestrian and public transport user, I feel Lewisham does far too much to encourage private vehicle ownership. On my street (Ennersdale Road) car parking spaces occupy 50% of the pavement. How is this an infrastructure to encourage active transport. We need to council to commit to radical action which actively discourages car ownership: fewer parking spaces; more LTN's; expand ULEZ to the entire Borough. Encouraging electric vehicles is a temporary solution and unsustainable for the future (given the carbon footprint for manufacturing these vehicles). And where will this infrastructure go? I've seen enough examples already, ugly charging ports taking up pavement space. The Council should be discouraging the use of private vehicles full stop. While the overall aims of the plan are welcome, the list of concrete plans are filled with vague statements about 'raising awareness'. If Lewisham is serious about tackling the Climate Emergency, they need to propose concrete and radical plans to discourage and decrease private vehicle use in the Borough.</i></p>		<p><i>As a lifelong pedestrian and user of public transport (and occasional cyclist), I have no interest in owning a private vehicle. To encourage active transport, behind by giving pavements back to pedestrians. Pavement parking was abandoned by most boroughs in the 70s, yet there are designated parking spaces on pavements all over Lewisham (Ennersdale Road, Leahurst Rd, Fernbrook Rd). If a street is too narrow to have parking on both side then it shouldn't. More trees, more LTNs, more cycle lanes and fewer cars and parking spaces please!</i></p>	<p>Agree with encouraging a shift away from car ownership but this is behaviour change and will take time. Lewisham will encourage electrical vehicle uptake. Lewisham supports the expansion of the ULEZ to cover the entire Borough however this is a TfL scheme. A combination of methods are looking to reduce traffic in the Borough, including cycling and walking infrastructure and LTNs.</p>	<p>No changes needed as already address through a number of actions included in the plan.</p>
<p>a resident</p> <p>ANON-1JDS-WHMD-C</p>	<p><i>Education of residents is not extensive enough and should be the main priority. For as long as there are residents who don't respect or adhere to the various rules aimed at reducing pollution, problems will persist. Enforcement is not Lewisham's strong point and prevention must become its focus. ULEZ punishes the working poor and the focus should be on imposing compliance rules on local authorities and big business first of all, before assessing the positive impact of that and then seeing what is left for the individual to do.</i></p>	<p><i>I can walk or take public transport more regularly. Fly tipping and poor management of refuse collections can be a real barrier to this with footpaths inaccessible due to fly tipped waste and/or wheelie bins left strewn across pavements. I have a ULEZ compliant car but know many of the working poor can't afford to change vehicles - this should be subsidised</i></p>	<p><i>I don't need support from Lewisham but others do. Invest in making old homes more carbon efficient reducing the need for residents to light fires. Replace single glazing, insulated homes, consider cycling some of the older property stock (e.g in conservation areas) out in favour of new. Help residents upgrade vehicles to low emission / electric alternatives but only do this when it is clear that the charging infrastructure can cope.</i></p>	<p>Comment noted. LBL agree with the need for investment in existing housing stock. The big question is how this is funded. The Government's Head and Building Strategy published last month does not make this clear. The suggestions have been passed on our enforcement teams. TfL should be contacted about the ULEZ.</p>	<p>Comment noted. The suggestions have been passed on our enforcement teams and TfL who implemented the ULEZ. Financial aid to upgrade vehicles to electric is not something that Lewisham can provide, however residents are able to apply for charging points and we are looking to install more ev infrastructure.</p>

<p>a resident</p> <p>ANON-1JDS-WHMR-G</p>	<p>The planning permission system in conservation areas actively works against addressing air quality issues by obstructing and blocking residents' attempts to retrofit properties (especially external insulation). This needs to be addressed so that the need for building conservation does not actively obstruct improving air quality and addressing climate change as it does at present.</p>	<p>I got rid of my car recently and have no plans to replace it until electric cars become more feasible. I have resisted commercial pressures to instal a wood-burning stove. I cycle where it is safe and practical to do so. I replaced my older gas boiler with the most efficient, low emissions model I could find.</p>	<p>1. Actually so something, anything, to enforce the declared 20mph speed limit. Currently there is no enforcement whatsoever and almost no-one observes the limit. Drivers who attempt to observe the limit are often abused, undertaken and even threatened by other drivers who want to drive at speeds beyond the limit.</p> <p>2. Ensure that planning/conservation departments stop obstructing and blocking residents' attempts to retrofit their homes.</p> <p>3. Conletely ban wood-burning stoves. It is absurd to suggest that some WBSs are "clean" or that owners of WBSs don't burn heavily polluting materials. Some wealthy residents want their WBSs, but Lewisham Council should not be pandering to their wishes.</p>	<p>These suggestions are under consideration during the design of our Local Plan.</p>	<p>No changes needed.</p>
<p>a resident</p> <p>ANON-1JDS-WHMP-E</p>	<p>Cyclists are on the increase and this will go up - massively - if the routes could be deemed safe. PROPERLY SAFE! At the moment too many drivers are in a hurry and it causes too many near misses.</p>	<p>I have stopped be a driver. I am no longer a car owner. I have three children and they have had to learn to cope. And it is a good lesson for them and the future. In inner city London there is, largely, no need for families to have cars.</p>	<p>It is a city-wide issue. And a national issue. Thats what Lewisham can do. It can work at getting all the other parties to do the same.</p>	<p>Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Individual scheme details are not published in the AQAP.</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
<p>a resident</p> <p>ANON-1JDS-WHMR-F</p>	<p>The proposals contain an overall lack of ambition. Heavy traffic, rat running, parking on pavements etc. remain a constant threat to the health of borough residents. The South Circular, particularly on Catford Bridge, are horrendously congested and polluted. The area has high footfall due to the stations and accomodation but the pavements are narrow and very close to the busy road.</p>	<p>I use active travel and public transport wherever possible. I pay for a garden waste bin instead of burning my garden waste.</p>	<p>Make parking more expensive. Charge oversized SUVs much more for parking (they don't even fit in marked parking spaces sometimes). Reduce parking across the borough. Clamp down on pavement parking. Install more cycle infrastructure. Build more pedestrian crossings. Make fewer roads through roads. Use ANPR to limit non-resident through traffic.</p>	<p>Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Parking on pavements is an issue through the Borough and greater investigation is required. A combination of methods are looking to reduce traffic in the Borough, including cycling and walking infrastructure and healthy neighbourhoods. Lewisham are currently working on a proposal to undertake a combination of improvements to Public Realm between Catford and Catford Bridge stations, utilising S106 funds for this purpose. There are no plans to increase parking based on the size of vehicles.</p>	<p>No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>
<p>a resident</p> <p>ANON-1JDS-WHMY-Q</p>		<p>Continue to not drive, using my bike and public transport.</p>		<p>No comment.</p>	<p>NA</p>
<p>a resident</p> <p>ANON-1JDS-WHM2-G</p>	<p>In answer to Q2 - the Council needs to make progress on all 7 items. Which aspects of which are to be prioritised should be based on a cost/benefit over 5 years - where cost is availability of funds and benefit is the gain in air quality over a sustainable period to a significant section of the population at risk.</p> <p>The time and energy spent on monitoring is only worth the spend and officers' time involved if the Council knows what it will do with the results to make an improvement in air quality. Extra data once adequate data has been collected in any particular case will be money badly spent - when money is so tight.</p> <p>I would wish to see a far higher priority given to promoting active travel, cycling and walking, in all its forms. I think this should probably be the top priority - mental health and overall physical health be improved as well as better lungs. Streets will be more available for walking in etc, etc. Use of private electric vehicles are very much a second best to active travel - which is not to say that no provision should be made for them - but active travel be prioritised.</p> <p>In this I would also include the work on School Streets. This is a good initiative wish I would wish to see rolled out to all schools - including considering naming and shaming, as a last resort, those that do not engage. Getting very many more getting parents and children to walk to school, especially primary school should be a feasible objective.</p> <p>Electric and other cargo bikes - other London boroughs are idling much more than Lewisham right now. Lewisham should commit in its strategy to learn from the best, in this any other areas - no need to re-invent the wheel best - so out council becomes a leader in its own right</p>		<p>I would wish the Council to provide a much better cycling infrastructure than is currently the case. We are laggards in London. Yes, tfl has been involved, too, but that is true of all the other London boroughs, too, where much more has ben going on.</p>	<p>Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. We encourage Schools to partake in the School Streets initiative but they are not required to join. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria. Cargo bikes is an area for Lewisham to research. Lewisham are exploring cycle hire procurement to implement a permanent cycle hire scheme, assessing providers and will likely run a trial.</p>	<p>The comments about monitoring around sensitive receptors are already under consideration (see Table 4.1) and will be implemented in due course. No changes to the final AQAP because the points made have been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.</p>

ANON-1JDS-WHM5-K	a resident	<i>The south circular needs addressing, especially the rat running through the Corbett estate and Hither Green lane. Not enough bus routes or safe walking routes. Not enough cameras to monitor. Proposal of 75 pollutant monitors is not enough, there should be many more. The burning of fires in peoples gardens is epidemic, this should be completely banned, no exceptions. Nobody polices this and it is terrible what it does to air quality during the summer months. You should make brown bins free and available to all properties to help avoid this.</i>	<i>I will be buying an electric car. I walk and use Public Transport as a priority first, but currently the network around the Corbett Estate is just not good enough, nor safe after dark. I do not burn rubbish or any fires, I am aiming to phase out the use of my gas boiler within the next 3 years.</i>	<i>Improve walking routes and public transport. Work with police to make the streets safer, install more CCTV. Ban the burning of vegetation and rubbish in peoples gardens, provide free recycling to help tackle this issue. Sort out rat runs through the Corbett estate. Improve the footpaths which are in a terrible state to make walking more appealing.</i>	Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Hither Green Lane and Corbett Estate can be investigated to identify the current issues and and remedial measures. CCTV is located in areas where compliance is extremely poor, it is generally the last measure due to its high cost implications.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHMV-M	a resident	<i>There is not enough emphasis on inappropriate vehicles using narrow roads through and cut throughs. Keeping large trucks on the main A roads is vital to keep congestion on residential streets. Speed monitoring, speed enforcement, improved pedestrian crossing and creating roads that are more suited to pedestrians and cyclists needs more focus so that pedestrians can travel safely through residential areas including Brockley,</i>	<i>Change vehicle to a cleaner one and walk cycle and use public transport wherever possible</i>	<i>Support our residents demand for a safer and healthier Road. Malpas Road B218, has experienced a large number of car accidents, with damage to private property and many resulting in car owners being removed from their vehicles by the emergency services. The road is not currently suitable for two way traffic as it is so narrow. Larger vehicles (vans and larger) cause congestion with multiple traffic jams adding to the pollution. There are little safe places to cross and this makes the road unsuitable for the more vulnerable in our community to use the road safely. Young children do not have one suitable pedestrian crossing and older people are scared of crossing Malpas Road. We have been campaigning for a safer road since 2014 with no changes.</i>	Malpas Road should be investigated into the issues that are raised. Lewisham supports the ULEZ and has pushed for the expansion to cover all of Lewisham. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Individual schemes are not detailed in the AQAP. Speed enforcement is undertaken by the police but speed monitoring is constantly undertaken by Lewisham.	No changes needed as already address through a number of actions included in the plan.
ANON-1JDS-WHMH-6	a resident	<i>Please reconsider school streets running. That should all be closed at the same time. Make ltn infrastructure permanent but call it something else!! "Ltn" is too toxic. Tell drivers where their money went. You conned and bullied me into paying £65 for going up an road with NO signage. I need to know it's coming back to me and in what form.</i>	<i>I've cycled all my life. I'm doing all i can without making myself more ill than i already am. Education. Community composting. Change the regs on paving over gardens</i>	<i>Correction: Please reconsider school streets timing. Allow older people to try cycling by providing a safe space to try rideling - all those sorts tracks not doing anything!! Give free cycle instructor training... I dont gave £400 to train. In Scotland, its free. Bike storage on every road- one car space = 5+ bikes = less traffic.</i>	All fines collected are used within the scope of Government legislation, which means it must go back into transport. School Streets are in place to prevent vehicles from accessing the school at the start and of the the school day, they have proved successful but remain under review. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Individual scheme details are not published in the AQAP. The cost of cycle training is not currently under review.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHMK-9	a resident		<i>By only using Ultra Low Emission Vehicles or walking, cycling or using public transport - the Council needs to help people do this by putting in wider footpaths, providing much more cycle storage, implementing cycle routes, and installing many more electric vehicle charging points.</i>	<i>Provide information about funding, and helping residents access vehicle charging points at home.</i>	Responses to the comments made on our proposed transport/highway/parking interventions are provided in the transport AQ specific policy statement attached this report.	No changes to the final AQAP because the point made has been considered in the draft plan.
ANON-1JDS-WHMB-Z	a resident				No comment.	NA
ANON-1JDS-WHMZ-R	on behalf of a business/organisation/institution/community group/authority				No comment.	NA
ANON-1JDS-WHMF-4	a resident	<i>Lewisham is not an island. It is part of London and cannot deal with these issues in isolation without makin life worse for everyone around us and those on the main roads going through lewishqm. These measures will lead to an improvement for a few privilged people and a worse situation for the poorerresidents of the borough.</i>		<i>Provide money. Most people can't afford the luxury of making changes and therefore things will only get worse for the poorer members of the community.</i>	These comments have been passed on to the GLA and TFL. We agree that council spend needs to be targeted on low income and vulnerable residents. This is under consideration.	Agree that working with neighbouring Boroughs and TFL is key
ANON-1JDS-WHMG-5	a resident	<i>I am new to thinking about this seriously. However, I have learnt that wind power is incredibly efficient. You mention solar power, but not solar wind power specifically. I actually think solar wind power might be a good resource in the borough. I live on the 4th floor of my building and developments around us have created a strong wind tunnel effect. I am aware that it is possible to install small wind turbines now, but I am struggling to find local businesses who specialise in this or to find more information in general. Would it be possible to promote the use of small wind turbines, via information, bursaries, new development legislation etc especially on buildings in the borough with multiple stories such as mine? This should bring business to the borough re installation of these products as well as reducing the carbon footprint of the borough.</i>	<i>I receive emails from you but they are easy to skim over or ignore. I think something visual in the community which connects these issues to the places I walk around each day would help me to think about the issues and to understand what I can do to help e.g. information boards, pieces of art/commissioning artists to work with messaging this to the community.</i>	<i>Deliver information to me. Enact legislative changes enabling the installation of solar/solar wind power if possible. Provide bursaries for the installation of equipment.</i>	The comments made have been noted and passed on to the relevant team for consideration.	No changes needed.

ANON-1JDS-WHM6-M	a resident	<i>I live on the South Circular (Honor Oak Park, SE23 3LH) and the traffic is choking. One simple fix has not been adopted. Many roads off the South Circular (eg. Grierson Road) are blocked to traffic. This means anybody who wants to access that road can't just turn left, but has to drive in a circle (all on the South Circular) to access it. You are literally drawing all of the traffic onto the busy, choked up, main thoroughfare - if you opened the side roads (which have been blocked to traffic for at least ten years), there would be far less traffic idling on the main road emanating petrol and diesel fumes. This particular main artery into and out of London was never such a congestion problem until all the side roads were blocked pushing all (even local traffic) onto the South Circular.</i>	<i>I have a car only for necessary journeys, not everyday use (I work from home). I would cycle everywhere and happily get rid of my car altogether if cycling wasn't so dangerous in London. A white painted line to separate bicycles from lorries and buses is completely inadequate as a safety precaution. Pavements are constantly widened in this area, narrowing roads and pushing vehicles even closer together, but why not create cycle lanes instead of widening pavements so much?</i>	<i>Replan the roads so that vehicles are not pushed into a bottleneck and open up side roads so that cars and buses etc can reach their destination more directly, and not be funnelled onto main roads when they are trying to get home to a minor road.</i>	These road closures are historic and not part of the AQAP, however they could be investigated to understand the current issue being described.	No changes to the final AQAP because the point made has been considered in the draft plan.
ANON-1JDS-WHMC-1	a resident				No comment.	NA
ANON-1JDS-WHMC-1	a resident					
ANON-1JDS-WHMC-1	a resident			<i>Be Transparent Do not lie or spin the facts and the figures to suit the agenda and actions being pushed Consult in person regularly Do not take years to reverse actions that have proved to be causing damage to local populations, infrastructure and increasing air pollution Do not push an agenda that appears to work for only a few based on radical beliefs Take into consideration those individuals that can't ride a bike or don't feel safe doing so Take into consideration the growing elderly population</i>	The comments made have been noted.	Lewisham's corporate priority is to build safer communities, where every resident feels safe and secure living here and travelling around the Borough.
ANON-1JDS-WHMC-1	a resident	<i>It's good to see this air pollution plan being drawn up, and I welcome the great progress made with school streets. There is an unfortunate lack of focus on concrete development of active travel infrastructure, and attention to EV charging, which, while important should be a last resort in sorting out air pollution. The (sorry, but laughable) provision of 600 secure bike hangar spaces across the borough is nothing like what should be available - there are 850 car parking spaces in Lewisham shopping centre alone! Given the huge opportunities for health and the economy when more journeys are made by walking or cycling, there should be much, much more attention paid to how to get people moving around actively, rather than just "encouraging". You can educate people all you like about the importance of reducing car journeys but if the alternative is unsafe or unpleasant - as it is in a lot of the borough - this will be unsuccessful. School streets are great, but don't link up with other walking and cycling infrastructure to allow children to walk and cycle safely from home. I would like to have seen a much greater focus on what the council is actually doing to make it safe and pleasant for people to walk and cycle. In addition, I would welcome information about how anti-idling measures will be enforced. I took part in the schools workshop at Coopers Lane, and regularly ask people to stop idling, but have seen little difference in the rates of idling. A traffic officer rotating around schools monitoring for idling would be very helpful. I have now submitted several instances of idling to the idling enforcement team but not had any feedback. I welcome the mention of green space as important for reducing exposure to air pollution</i>	<i>Car is a last resort Modelling active travel to friends and family and my children Asking people to stop idling when I see it No bonfires/bbqs</i>	<i>The council needs to install well designed and joined up cycling and walking infrastructure across the borough. This will enable people to make the shift to active travel and will ease transition to healthy neighbourhoods (/LTNs) when these are rolled out across the borough. Funding for these needs to be considered in the context of the health and care benefits to be gained by improving physical activity. The status quo is unsustainable, appalling for the climate, and appalling for health, both from damaging air pollution and from unhealthy inactive lifestyles.</i>	Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all, this includes infrastructure and new cycle hangars. Individual scheme details are not published in the AQAP. Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles and LBL will erect non idling signs around schools as necessary and will continue taking enforcement actions if necessary. The Strategy for Parks & Open Spaces prioritises healthy streets and green spaces in Lewisham. Our Parks/open spaces and our local plan presents measures to increase green infrastructure across the borough.	No changes needed as already address through a number of actions included in the plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHMM-E	a resident	<i>There is mention of green space but the fact that Lewisham loses 150-200 mature trees every year is not being addressed. This will contribute to a significant loss of mitigation against the health impacts of air pollution. Please ensure that the air quality strategy is linked with green space strategy and that the loss of mature trees is halted. More information: https://blog.ecosia.org/how-trees-reduce-air-pollution-world-environment-day/</i>	<i>Previously answered</i>		The comments have been passed on to the relevant Team for consideration.	No changes needed.
ANON-1JDS-WHMS-H						

ANON-1JDS-WHMA-Y	a resident	<i>The issue of Lewisham being a major transport route with high volumes of trucks and other diesel polluting vehicles is not being addressed enough. Charging polluting and commuting vehicles for travelling through Lewisham is one way of reducing them.</i>	<i>I cycle or walk. On the rare occasion I do drive, I use an electric vehicle. I make sure all my children cycle to school. I am actively campaigning for my children's school to become a school street. I support temporary road closures for pedestrians and play streets. What would help me to continue doing this is better cycling infrastructure in Lewisham, more pedestrianised areas and making all primary schools School streets as the norm.</i>	<i>Better cycling and pedestrian infrastructure. Make air polluters pay, e.g. by charging residents a tax on vehicle ownership- charge more for the most polluting vehicles or ownership of more than one vehicle. Make all primary schools have School streets with NO vehicles allowed on them during drop off/ pick up. Increase pedestrianised areas and pedestrian crossings. Offer cycle loans/ cycle training to improve access to bikes and cycling confidence across the borough.</i>	Lewisham supports the ULEZ and has pushed for the expansion to cover all of Lewisham. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Individual schemes are not detailed in the AQAP. We encourage Schools to partake in the School Streets initiative but they are not required to join. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria. The Try before you bike scheme allows you to try out a new or nearly new bike for a monthly fee.	No changes needed as already address through a number of actions included in the plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHQD-6	a resident	<i>There should be much better infrastructure for walking and cycling in Lewisham. Particularly there needs to be a re-allocation of road space from cars to people. Huge investment in segregated cycle lanes (which are lacking in Lewisham). Reduce on-street parking in favour of wider pavements. Ban ALL pavement parking borough-wide and enforce.</i>	<i>I don't own a car, I don't drive and I walk/cycle every trip I make within the borough.</i>	<i>Invest in safe cycling and walking infrastructure!!!! This is THE most important factor in getting people out of their cars and adopting active travel.</i>	Agree with comments. Walking and cycling is key to active travel and Lewisham are proactive in making walking and cycling safer for all. Parking on pavements is an issue through the Borough and greater investigation is required.	No changes to the final AQAP because the point made has been considered in the draft plan. Table 4.1, Action 25 refers to provision of infrastructure to support walking and cycling.
ANON-1JDS-WHXC-C	a resident			<i>Reverse engineer LTN's and school streets, as extended ULEZ will be introduce shortly & E10 new petrol began in September, as explained section 6.</i>	LTNs and School Street go through a number of stages before implementation, this allows for maximum scope and to achieve the right measures for the location. Criteria to select school for actions will be included in the school air quality action plan. These will include school and public engagement, existing air quality interventions and GLA predicated air quality concentration of pollutants among other criteria.	No changes to the final AQAP because the point made has been considered in the draft plan.
ANON-1JDS-WHQN-G	a resident				No comment.	NA
ANON-1JDS-WHQQ-K	a resident	<i>I think it looks a thorough campaign, but I think it is still possible for people in lewisham to be completely unaware of all you are trying to do. I think more efforts to reach more people and create real change are essential to have real success in acueving the goal such for 2030. The goal is admirable and the goalposts are in view but people need to be MOBILISED and shown both how to take responsibility for their own actions, given compelling incentives to do so, and be shown how the council and government are making our streets and workplaces much much more environmentally sound and safe. This will on turn inspire compliance and a comprehension of the challenges we are all facing.</i>			The comments have been noted and will be considered.	No changes needed.
ANON-1JDS-WHQJ-C	a resident	<i>Most of the Council's housing stock has low energy performance scores because of a lack of roof and wall insulation.</i> <i>For decades the Council has failed to utilise idle land for green (and other economic or social) purposes and residents have to pay Council Tax to maintain land which could help to deliver green objectives.</i> <i>The Council has made no effort to reopen Brockley Train station or increase the capacity of other overcrowded public transport services because it always just says this is TFL's responsibility.</i>	<i>Walking, cycling, public transport, green initiatives at home etc</i>	<i>Lewisham Council has not made any efforts for our council owned block to be allowed to install electric chargers. We have asked multiple times but are just told to speak to the management company and this company says it is not in the contract and no funds to implement. Lewisham Council needs to ensure that its contracts with suppliers have tangible green requirements.</i> <i>Lewisham Council has allowed the management company of multiple blocks to continue installing gas boilers in council owned properties. What a waste of money and lack of forward thinking.</i>	The comments have been noted and will be considered.	No changes needed.
ANON-1JDS-WHQX-T	a resident		<i>Driving a modern car with low emissions, swapping to electric vehicle once they clean up the environmental impact of making electric cars and create batteries long enough to do the long distance drives I have to do. Never idle my engine. Walk when I can. (I will not cycle as I consider it far too dangerous with all the crazy and terrible drivers on London roads!</i>	<i>Enforce the ULEZ. Ensure no buses or taxis which aren't ULEZ compliant drive in the Borough. Do something about the reports of idling cars.</i>	Civil Enforcement Officers have the power to serve a Penalty Charge Notice for idling vehicles. Lewisham supports the expansion of the ULEZ to cover the entire Borough, but this is a TfL scheme. It is designed to discourage driving with a higher emission vehicle, rather than to prohibit.	No changes to the final AQAP because the point made has been considered in the draft plan.

Paper responses		Three (1-3) paper responses	<p>Respondent 1: (a) Insulating homes and ensuring that new developments are well insulated with sustainable energy (b) Final mile collection and not individual deliveries (c) Banning diesel from Lewisham roads, like Deptford Church Street</p> <p>Respondent 2: (a) Annual report on progress-overview by independent assessors to ensure rigorous application</p> <p>Respondent 3: (a) More bicycle infrastructure</p>	<p>Respondent 1 (a) Stop cutting down trees and building on green spaces (b) Strong enforcement of air quality policies (c) Grants, subsidies and incentives</p> <p>Respondent 2 (a) Tell us how to avoid the dreadful air and how to protect children</p>		
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Appendix 3 - Equality Impact Assessment (EqIA)

APPROVAL OF 2022-2027 LBL AIR QUALITY ACTION PLAN (AQAP)

VERSION1 | MAY 2022

Appendix 3 - Equality Impact Assessment (EqIA)

About this document

The need to undertake an Equality Impact Assessment (EqIA) arises from Section 149 of the Equality Act 2010. It is meant to help public bodies to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic'. Protected characteristics are Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race (ethnicity), Religion or belief, Sex, Sexual orientation.

The EqIA ensures proposals are fair, do not negatively impact equality groups in disproportional ways and do generally impact all groups positively. As engagement and proposals progress, the EqIA will be reviewed and updated accordingly.

This EqIA is evaluating the impact of the 2022-2027 LBL Air Quality Action Plan (AQAP) on the different groups.

Aim of this Assessment

London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP should set out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027. This action plan replaces the previous plan which ran from 2016 to 2021. An EqIA is needed to assess the impact of the 2022-2027 LBL Air Quality Action Plan (AQAP) on the different groups.

Overall Impact of the AQAP on Equality

Air quality has a major impact on the health and quality of life of residents and visitors to the borough. Air pollution can have a detrimental effect on people's health, especially our most vulnerable citizens; children, the elderly and people with existing health conditions. The Council has made important strides in improving air quality in the borough in recent years but we know there is more that needs to be done. We want to work with residents, local businesses and our London partners to make Lewisham a cleaner, greener, healthier place to live, work and visit.

Improving air quality is likely to improve the health of the general population but mostly those living in deprived areas and from Black, Asian and Minority ethnic groups. The Equality Impact Analysis shows that the current AQAP measures impact all groups positively overall and in particular the ones that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers, members of the LGBT community and Black, Asian and Minority ethnic groups.

In an area of low employment and income, the most deprived are likely to be affected by poor air quality and most likely to benefit from the AQAP if approved, adopted and implemented.

The age distribution of the respondents to the AQAP consultation corroborate with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with diverse groups of the population.

Suitable measures have been taken to mitigate any negative impact on equality. A summary of the assessment is as follows.

Appendix 3 - Equality Impact Assessment (EqIA)

Author	Dr Eliane Foteu	Directorate	Public Realm	
Date	May 2022	Service	Environmental Health/Environmental Protection	
1. The project or decision that this assessment is being undertaken for				
<p>London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP should set out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027. Schedule 11 of the Environment Act 1995 requires local authorities to consult on their AQAP with a range of persons and organisations. Consultation was undertaken between September and October 2021 and the plan updated with the suggestions made by the consultees. It is recommended that committee:</p> <ul style="list-style-type: none"> Note the consultation responses report Note the changes made to the draft AQAP following consultation Note the new World Health Organization (WHO) air quality guideline for PM_{2.5} Review and approve the final AQAP 				
2. The protected characteristics or other equalities factors potentially impacted by this decision				
<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Maternity	<input checked="" type="checkbox"/> Language spoken	<input checked="" type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Household type	
<input checked="" type="checkbox"/> Religion	<input checked="" type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Income	
<p>The GLA report¹ analyses the relationship between exposure to air pollution, deprivation and ethnicity in London in 2019. This GLA report builds on previous analysis undertaken on behalf of the Greater London Authority: Air Pollution Exposure in London: Impact of the Environment Strategy (2019), updated Analysis of Air Pollution Exposure in London (2017) and Analysing Air Pollution Exposure in London (2013). These reports all focused on air quality in London, seeking to identify whether air pollution had a role in health and social inequality and the degree to which it could be quantified (using data available at that time). The later report shows communities which have higher levels of deprivation, or a higher proportion of people from a non-white ethnic background, are still more likely to be exposed to higher levels of air pollution. However, thanks to the Mayor's policies, the gap between the most and least deprived areas for exposure to NO₂ has narrowed by up to 50%.</p> <p>The above research has revealed a relationship between poor air quality and social, cultural and economic factors. Age, ethnicity, previous health condition, disability income have the highest impact on this decision. Impact of other factors on Air quality have are yet to be proven and researched.</p> <p>In order to ensure that the voice of everyone is heard, the general public was consulted on the draft AQAP and the results of the consultation exercise carried out between September and October 2021 suggest failure of engagement among minority groups in Lewisham. The failure of engagement can be attributed to cultural differences or social and economic inequalities, with the people from Black and Minority Ethnic (BME) backgrounds (which are more impacted by air quality in accordance with recent research), more likely to be interested in meeting their financial and socio-cultural needs than taking part in surveys with others potentially not having English as a first language.</p> <p>A summary of public health air quality indicators for London authorities is available online for consultation. For Lewisham, the values and trends of indicators are currently 6.4, 11.3 and 55.5% respectively for the fraction of mortality attributed to particulate air pollution; air pollution: fine particulate matter both for the year 2019; and the proportion of population living within Air Quality Management Areas (AQMAs) (%) in 2017. These indicators will be monitored throughout the course of this plan.</p>				
3. The evidence to support the analysis				

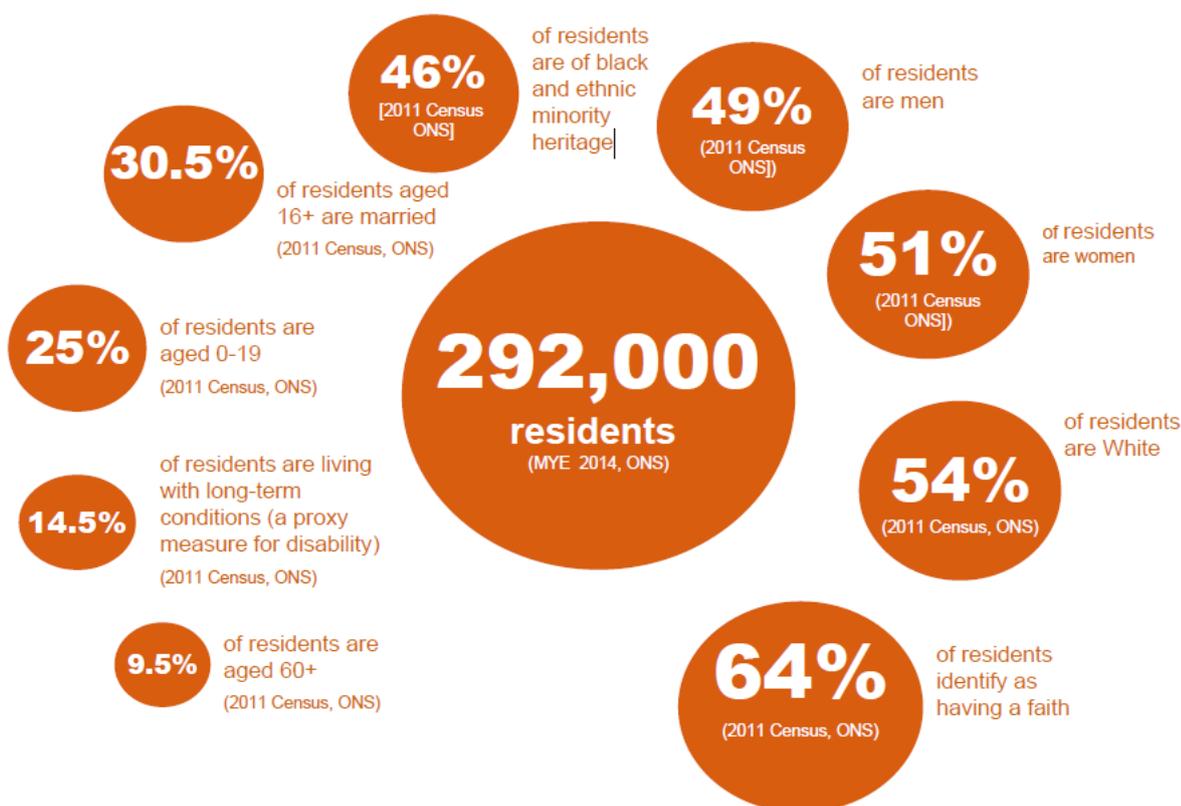
¹ https://www.london.gov.uk/sites/default/files/air_pollution_and_inequalities_in_london_2019_update_0.pdf

Appendix 3 - Equality Impact Assessment (EqIA)

This information about demographics of the survey has been sourced from Census 2011, the Lewisham's Joint Strategic Needs Assessment dated 2018 and a 2016-2020 comprehensive Equalities Scheme Data sift analysis undertaken for 2016-20 all available online to support this AQAP EqIA.

Age: The total population of the borough is 275,900, an increase of 27,000 (9.8%) since the 2001 Census. According to Lewisham's Joint Strategic Needs Assessment, one in five of the overall population is under 15, but this is doubled in the Bangladeshi group, and more than more than doubled in the Black Other group. The under 15 proportion is lowest in the White and Chinese groups. The proportion in the over-65 group is highest in the White, Black Caribbean, Indian, and Chinese groups. In 2008/09 there were 35,062 pupils enrolled in Lewisham's 91 schools, 61% of which were from black and minority ethnic (BME) communities (3% not known). This percentage of BME pupils is significantly different from the proportion within the resident population. This could be interpreted as an indication of the future ethnic make-up of Lewisham's adult population, knowledge that could assist in planning services for both the current population aged under 18 years and future adult service users. However, it must be noted that some areas of the borough have a highly mobile population and some pupils attending Lewisham schools may not reside in the borough. As such, this information cannot be used as the sole basis of predicting future need.

A current 2016-2020 Comprehensive Equalities Scheme Data sift analysis undertaken shows the following figures:



With reference to the AQAP consultation responses, the majority (17.43%) of respondents were between 45-49 years of age. People aged 18-24 and 75-79 represented the age groups with the lowest (8.3% for each) proportion of responses. 6.22% of respondents provided no answer to the age question and 5.39% did not to state their age. The residual percentage was distributed among other categories.

Poor air quality affects the most vulnerable people in Lewisham therefore the adoption of the AQAP is likely to have a positive health impact on children and the elderly.

Ethnicity: According to Lewisham's Joint Strategic Needs Assessment, Lewisham is the 15th most ethnically diverse local authority in England, and two out of every five residents are from a black and minority ethnic background. The largest BME groups are Black African and Black Caribbean. Black ethnic groups are estimated to comprise 30% of the total population of Lewisham. Whilst the most populous ethnic group remains White British, both the actual

Appendix 3 - Equality Impact Assessment (EqIA)

number and proportion of residents stating this as their ethnicity has decreased since 2001. The next biggest group is now Black African.

A Comprehensive Equalities Scheme Data sift analysis undertaken for 2016-20 shows that the largest combined ethnic group in the borough is categorised in the census as White; English/Welsh/Scottish/Northern Irish/British. New Cross ward has the highest proportion of people whose self-identified ethnicity is Black African. Catford South has the highest number of people who identify as Black Caribbean.

7.14% provided no answer and 7.14% preferred not to state their ethnicity. Of those that did, the majority of respondents (71 %) were white with the rest distributed across other ethnic groups. This indicate that the view of BME groups who are more likely to be impacted by air quality remain limited.

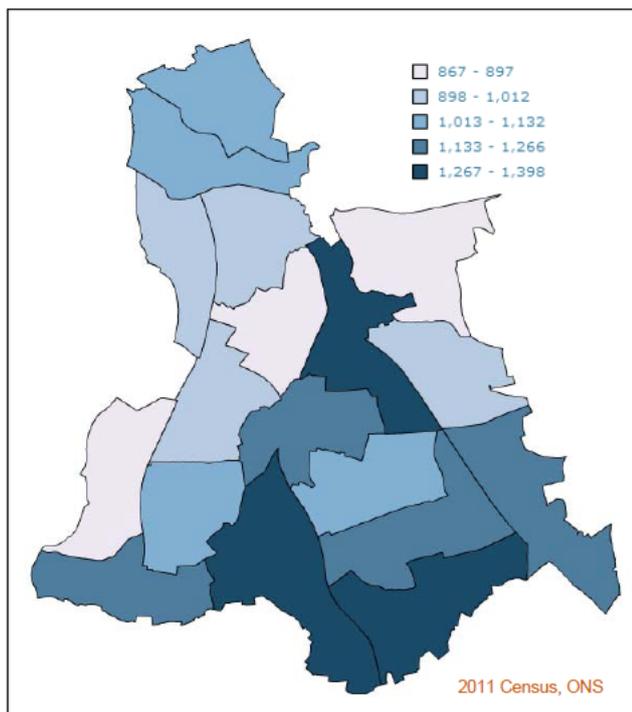
The adoption of the AQAP is likely to have a positive impact of the health of all groups of the population in Lewisham and beyond.

Sex: There were slightly more male (44.96%) than female (43.70%) respondents. Some did not answer or preferred not to state their gender; this is contrary with the age demography presented in the 2016-2020 Comprehensive Equalities Scheme Data sift i.e. 49% of residents are men and 51% of residents are women.

The adoption of the AQAP is likely to have a positive impact of the health of all group of the population in Lewisham and beyond.

Disability:

Number of people whose day-to-day activities are limited a lot



Context

- A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out standard day-to-day activities
- The Equality and Human Rights Commission guidance defines disability in terms of its effects rather than underlying categorisation of impairments
- Analysis of Lewisham's recent residents survey found that less than half of disabled residents (48%) were confident that their local community would be able to help if a service in their local area was under threat, compared to two-thirds of non-disabled residents (66%) PPU 2015
- Analysis by Public Health England for its learning disability profiles indicates that Lewisham has average numbers of learning disabled people (16-64) known to the Council (four per 1000).

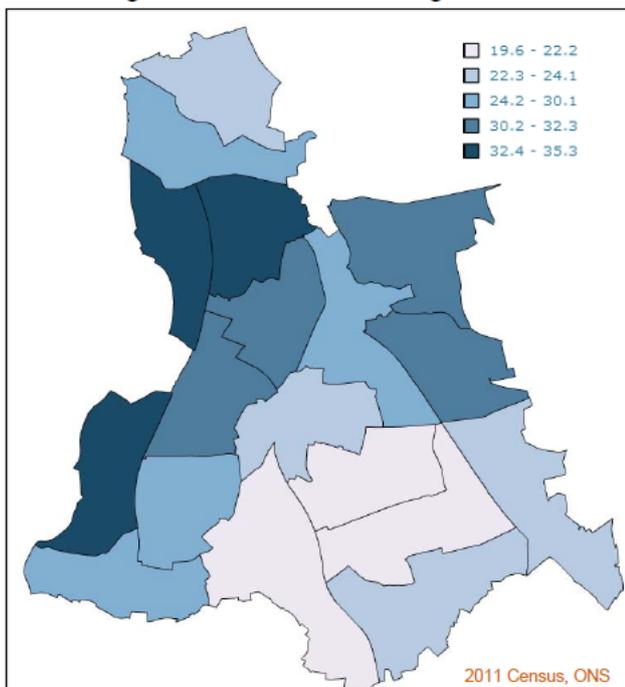
7.14% were disabled (disabilities distributed across all categories), 9.24% provided no answer, 6.30% preferred not to say, the majority of respondents did not identify as disabled. Easy read, step-free access, accessible toilets, wheelchair access were among suggestions given to improve accessibility of the consultation.

The adoption of the AQAP is likely to have a positive impact of the health of all groups of the population in Lewisham and beyond.

Appendix 3 - Equality Impact Assessment (EqIA)

Religion: Christianity was the most common religion in Lewisham at the time of the 2011 Census (53%), followed by Islam (6%). About 27% of people stated they had no religion and 9% did not state their religion or belief. As seen across Britain the proportion of residents stating they do not have a religion has increased to 27.2% of the population.

Percentage of residents with no religion



Context

- Protections for religion or belief have been challenged and broadened at employment tribunals and in case law
- *Eweida and Chaplin v the United Kingdom* focused on the wearing of religious symbols at work
- *Ladele and McFarlane v the United Kingdom* – found that employees could not be exempted from their duties (an registrar and a counsellor) because of their religious beliefs
- Belief in climate change and some political beliefs have been used at tribunal as grounds for protection under the act
- To be considered as a belief it must be of 'sufficient cogency, seriousness, cohesion and importance and... worthy of respect in a democratic society'.

The majority (48.55%) did not state a religious preference, 9.54% preferred not to say anything about their religion and 17.43% provided no answer. Of those that did respond 19.09% were Christians, the remainder were distributed among other religions.

The adoption of the AQAP is likely to have a positive impact of the health of all faith in Lewisham and beyond.

Sexuality: according to Lewisham's Joint Strategic Needs Assessment, there are no accurate statistics available regarding the profile of the lesbian, gay, bisexual and transgender (LGBT) population either in Lewisham, London or Britain as a whole. Sexuality is not incorporated into the census or most other official statistics. The Greater London Authority based its Sexual Orientation Equality Scheme on an estimate that the lesbian and gay population comprises roughly 10% of the total population. This would make the lesbian and gay population of the borough roughly 20,000, although whether this includes bisexual or transgender individuals is unclear.

About 0.4% of Lewisham households comprise same sex couples in civil partnerships (Census 2011). This is more than double the average for England.

Appendix 3 - Equality Impact Assessment (EqIA)

- In 2007, a question on sexual orientation was added to the Council's Annual Resident Survey for the first time;
- the results showed that out of 1,042 respondents 92 per cent identified themselves as heterosexual/ straight, whilst 2 per cent identified as being gay, lesbian or bisexual;
- In the 2009 Annual Resident Survey, the same question was asked and out of a total of 1,022 people 95 per cent identified themselves as heterosexual/straight and 1 per cent identified as being gay, lesbian or bisexual;
- in 2014 a total of 1022 people were asked, 88 per cent identified themselves as heterosexual/straight 4 per cent identified as gay, lesbian or bisexual

Lewisham Residents' Surveys 2007, 2009, 2012: Policy and Partnerships

Context

- Information about sexual orientation is not gathered by the census
- There are no reliable local measures for determining the numbers of gay, lesbian and bisexual people
- Each of the groups within the category has its own levels of diversity and differentiation
- Public Health England estimates project the numbers of men who have sex with men for epidemiological modelling, which provides an approximation of the distribution of gay men in the borough based on access to sexual health services
- This modelling indicates that the population of MSM in Lewisham is between 4 and 8 per cent of the male population (aged 16-44).
- Lambeth and Southwark are estimated to have MSM populations of between 12 and 20 per cent, representing populations of 15,000 and 10,000 respectively.

The majority (62.24%) of respondents identified as heterosexual, the remainder of respondents was distributed among other categories. 11.62% preferred not to say their sexuality and 16.60% who provided no answer.

The adoption of the AQAP is likely to have a positive impact of the health of all Lewisham's population.

Gender Identity:

- Information about the trans* community is not collected in the census
- No information exists locally about the extent or distribution of the trans* community
- The Gender Identity Research and Education Society (GIREs) has carried out work estimating the size of the transgender population in the UK
- It is estimated that there are between 10 and 45 people per 100,000 presenting as trans* in different areas of the UK
- GIREs research indicates that the trans* community is susceptible to high levels of change and mobility
- The effect of supportive services and provision of support to members of the community is likely to enable more people to come forward to health professionals.

Context

- Protection based on gender reassignment is included in the 2010 equality act
- The focus on numbers of people is unlikely to give an indication about the levels of prejudice and discrimination affecting the community
- GIREs highlights that trans* people face discrimination and associated problems with safety and mental health as a result of discrimination and prejudice
- Work by GIREs also indicates that the numbers trans* people accessing medical services each year is increasing.

GIREs: <http://www.gires.org.uk/>

The majority (67.22%) of respondents identified with the same gender as the one that they had at birth. The remainder were distributed among other categories with 10.79% preferring not to say their gender at birth, 21.16% provided no answer. 0.83% had different a gender identity from the one that they had at birth.

Appendix 3 - Equality Impact Assessment (EqIA)

The adoption of the AQAP is likely to have a positive impact of the health of all Lewisham's population.

Geographic location :

- The majority of respondents (14.11%) live in Lee Green, and 12.45% live in Lewisham Central. The remainder were distributed among other locations with 2.49% not living in Lewisham. 12.45% provided no answer.

	Males				Females			
	2011 Census		2001 Census		2011 Census		2001 Census	
	Number	%	Number	%	Number	%	Number	%
Residents aged 16-74	100,913		88,675		105,342		94,460	
Managers, directors & senior officials	7,711	11.1	10,219	17.1	5,426	8.2	6,620	12.1
Professional occupations	14,891	21.3	8,860	14.8	15,918	24.0	7,403	13.5
Associate professional and technical occupations	12,468	17.9	10,105	16.9	10,007	15.1	10,397	19.0
Administrative & secretarial occupations	4,636	6.6	5,292	8.8	11,395	17.2	13,668	25.0
Skilled trades occupations	9,419	13.5	8,453	14.1	1,613	2.4	938	1.7
Caring, leisure & other service occupations	3,183	4.6	1,914	3.2	9,640	14.5	6,077	11.1
Sales & customer service occupations	4,498	6.4	3,081	5.1	5,874	8.9	4,857	8.9
Process, plant & machine operatives	4,981	7.1	4,707	7.9	569	0.9	653	1.2
Elementary occupations	7,966	11.4	7,260	12.1	5,862	8.8	4,085	7.5

Census 2011 data analysis – Policy and Partnerships 2012

Context

- Women are under represented in manufacturing and construction, transport and storage jobs and over represented in education, human health and social work activities
- A gender based pay gap remains, with women overrepresented in lower paid and part-time professions
- Nine out of ten single parent households are headed by women.

The adoption of the AQAP is likely to have a positive impact of the health of all Lewisham's population. Especially the residents living in Lee Green, and those living in Lewisham Central.

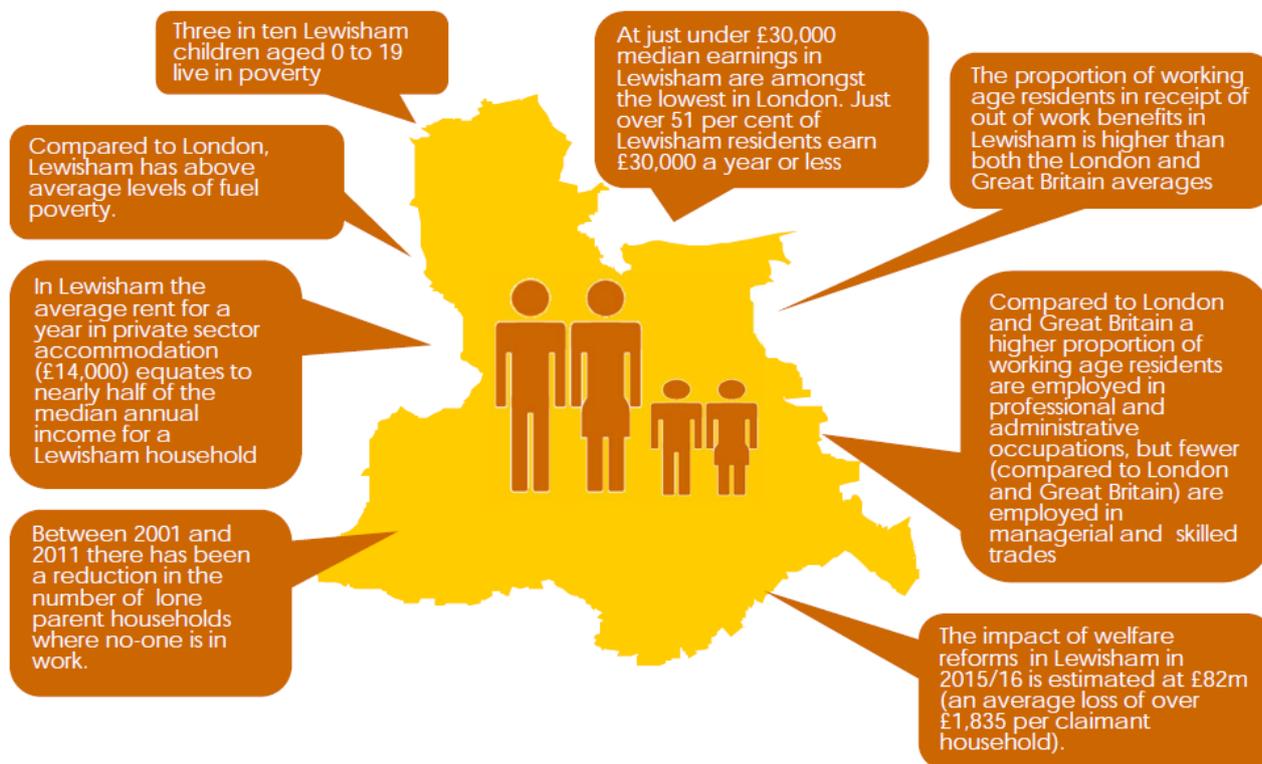
Conclusions: The age distribution of the respondents corroborate with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with other groups of the population. The results may also be attributed to cultural differences or social and economic inequalities, with the people from Black and Minority Ethnic (BME) backgrounds (which are more impacted by air quality in accordance with recent research), more likely to be interested in meeting their financial and socio-cultural needs than taking part in surveys with others potentially not having English as a first language. The findings related to disability raised the issue of resources needed to better meet the needs of this group. Most respondents were from the Lee Green and Lewisham Central areas, which is representative of the populations most affected by the LTN. The general negative perception of the LTN by this group may have impacted the results of the survey.

The following criteria were not assessed as part of the survey but are likely to influence the measure adopted in the AQAP because poverty and deprivation has been known to be linked to poor air quality.

- Poverty in Lewisham
- Health
- Indices of multiple deprivation
- Life expectancy
- Employment and income
- Indices of multiple deprivation: employment deprivation

Appendix 3 - Equality Impact Assessment (EqIA)

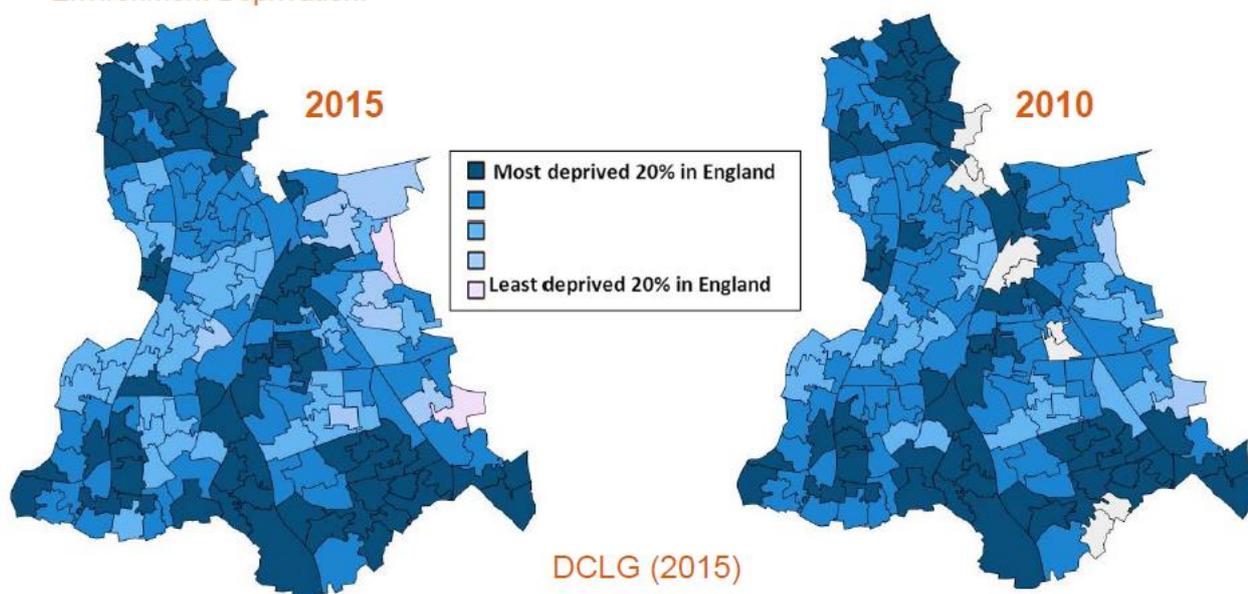
Poverty in Lewisham



Indices of multiple deprivation

The Index of Multiple Deprivation (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation, as follows:

- Income Deprivation; Employment Deprivation; The Education, Skills and Training Deprivation; The Health Deprivation and Disability; Crime; Barriers to Housing and Services; Living Environment Deprivation.



Health

- The gap in life expectancy within Lewisham is increasing.
- Levels of childhood obesity are higher than the England rates - 24.3% of children in year 6 (10-11 year old) identified as obese. Nearly two thirds of adults (61.2%) are overweight and obese, of these 23.7% are obese.

Appendix 3 - Equality Impact Assessment (EqIA)

- Only 57.1% of adults (aged 16+) achieve the recommended levels of physical activity and 27.5% are classified as inactive
- Smoking related deaths are higher than the average. Smoking prevalence among routine and manual workers is 30% compared with 21% of the adult population
- Alcohol related hospital admissions are increasing and at a higher rate than England.
- Young women have twice the rate of admissions compared with young men
- An estimated one in three adults admitted to care homes are malnourished or at risk of malnutrition
- Care of people with long term conditions accounts for 70% of the money spent on health and social care in England.

Life expectancy

Life expectancy

- ➔ Lewisham's Health and Wellbeing Strategy sets out the borough's strategic approach to addressing health inequalities
- ➔ By tackling health inequalities, the Council and its partners are able to make an important contribution to increasing life expectancy for Lewisham residents
- ➔ Early deaths (under 75) due to cancer, cardiovascular disease and chronic obstructive pulmonary disease are the main contributors to the gap in life expectancy between Lewisham and England
- ➔ Life expectancy varies in different parts of Lewisham. There is more than a seven year difference in mortality between women and almost an eight year difference in Women. Public Health England, 2015
- ➔ People with mental health disorders and the LGBT community experience disproportionate levels of smoking associated harm since they are more likely to smoke and to smoke more heavily than the general population.

Lewisham Public Health team, 2015

Context

- ➔ Life expectancy for men is lower than the England average, but the gap is decreasing for both men and women, whilst the gap within Lewisham appears to be increasing.
- ➔ The average life expectancy for Lewisham males in 2011-13 was 78.7 years against an England average of 79.4 years.
- ➔ The average life expectancy for Lewisham females in 2011-13 was 83.0 years against an England average of 83.1 years.

Lewisham Public Health team, 2015

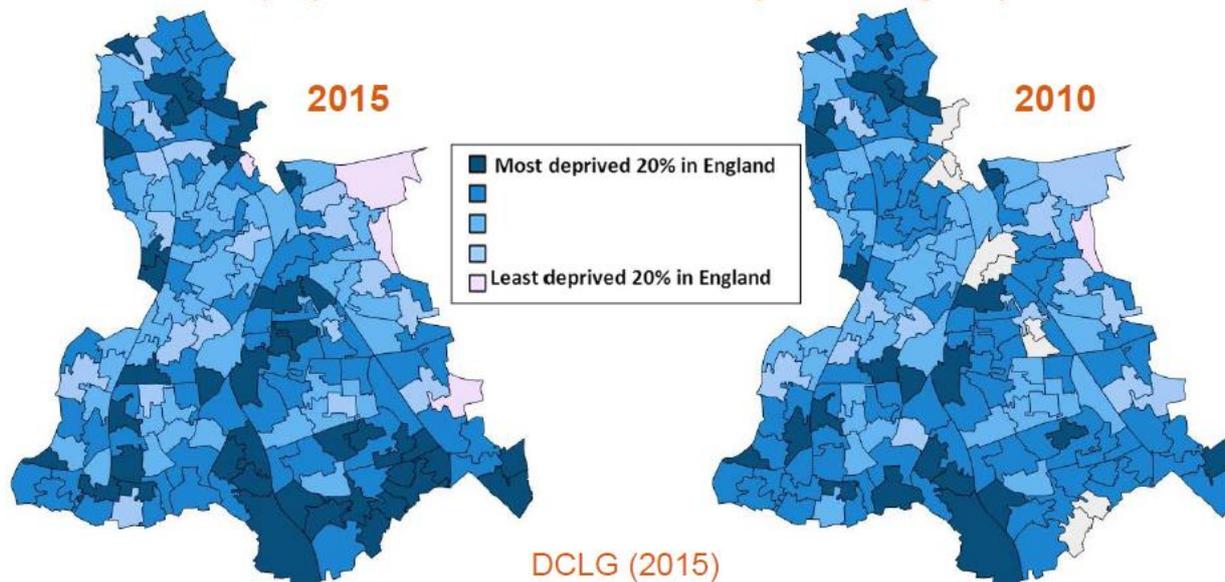
Employment and income

- Lewisham's working population is younger and more active than the inner London and England averages
- However, unemployment continues to be higher than the London and inner London averages
- Lewisham has high levels of residents with qualifications at level four (degree or equivalent) however there are also just under a fifth of residents with no qualifications
- The distribution of residents with and without qualifications across the borough is uneven.

Appendix 3 - Equality Impact Assessment (EqIA)

Indices of multiple deprivation: employment deprivation

The Employment Deprivation Domain measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.



4. The analysis

Air quality has a major impact on the health and quality of life of residents and visitors to the borough. Air pollution can have a detrimental effect on people's health, especially our most vulnerable citizens; children, the elderly and people with existing health conditions. The Council has made important strides in improving air quality in the borough in recent years but we know there is more that needs to be done. We want to work with residents, local businesses and our London partners to make Lewisham a cleaner, greener, healthier place to live, work and visit.

The survey carried out as part of the consultation revealed that people from White backgrounds are most likely to contribute the any decision to improve air quality across the borough. The age distribution of the respondents corroborate with the most active group of the population or those most able to use the internet to respond to the consultation. The distribution of the ethnicity is in line with most consultation surveys and suggests the need for the Council to engage with other groups of the population.

Improving air quality is likely to improve the health of the general population but mostly those living in deprived areas and from Black, Asian and Minority ethnic groups. The Equality Impact Analysis shows that the current AQAP measures impact all groups positively overall and in particular the ones that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers, members of the LGBT community and Black, Asian and Minority ethnic groups. Areas of low employment and income and the most deprived are likely to be affected by poor air quality and most likely to benefit from the AQAP if approved, adopted and implemented.

5. Impact summary and Mitigations

As detailed in the previous sections, overall, the approval, adoption, publication and implementation of the AQAP is likely to have an overall positive impact on equality and reduce the health gap between the most vulnerable and the poorest in Lewisham and London in general.

Members of the public see a number of benefits as a result of an AQAP, including a reduction in vehicle and industrial emissions. Such perceptions may also go wider to include, for example, noise and road safety benefits. The general public perception is that some nuisance issues will be dealt with in the AQAP.

Appendix 3 - Equality Impact Assessment (EqIA)

- In communication about the LBL AQAP to the public, LBL are emphasising the wider quality of life benefits as well as the air quality and health benefits.
- LBL will also emphasise on the positive aspects of the AQAP in terms of peripheral benefits.
- We will raise awareness and promote air quality to encourage active travel to improve wellbeing and the health of its residents.

The perceptions of four groups have been considered: the public, industry and commerce, politicians and other local authority functions and regulators combined with non-Air Quality Impacts of this plan. Perceptions of air quality problems and their solutions may have a significant Impact on how successful and effective the AQAP will be. In addition, measures proposed are practicable for the various circumstances of the LBL. Just how practicable the proposed measures within the Action Plan are, may or may not be linked with the perceptions of these measures by the public, politicians, industries and commerce, stakeholders and LBL generally. The practical implications for a number of mitigating measures have been considered. Actions to mitigate negative responses from the variety of stakeholders will be considered and reviewed, and suitably practicable actions adopted as detailed in the following section.

Having developed an air quality action plan or strategy, LBL have considered options for the achievement of the air quality objective(s) in question. In assessing these options and identifying potential mitigating measures, it was important for LBL to consider the socio-economic and wider environmental impacts from the options and measures, where possible. This will contribute to our achievement of sustainable development objectives, and will assist with the emerging development of community strategies for promoting improvements in the social, economic and environmental well-being of residents in Lewisham. Possible impact and mitigations measures are described below.

Impacts	Description	The key action points for mitigation
Socio-Economic Impacts	Socio-economic impacts may occur where local business and industry is affected by certain measures proposed (either directly or indirectly through changes in transport provision). In addition, some initiatives such as the LTN and ULEZ, may impact upon lower socio-economic groups to a greater extent, which may not be socially acceptable.	<ul style="list-style-type: none"> • We will continue liaising with communities likely to be affected so as to assess the likely impact of the options proposed, using techniques such as surveys, public meetings and focus groups, and consult with Community Officers as appropriate. • Consider the use of techniques as applied in Social Impact Assessments (SIAs) during the course of the plan. • Ensure that the action plan is complementary to any emerging Community Strategies and Sustainability Strategies. • Ensure that particular sectors or social groups are not unfairly penalised by the actions proposed within this plan
Climate Emergency Action Plan change	Our 2020 Climate Emergency Action Plan is closely associated with LAQM policy. This sets out the Council's ambition for Lewisham to be a carbon neutral borough by 2030. Many measures to reduce CO ₂ emissions will also deliver other benefits including improvements in air quality. However, some measures to secure local air quality improvements can result in an overall increase in CO ₂ emissions, e.g. promoting public transport.	<ul style="list-style-type: none"> • We will assess the impacts of each proposed measure, and group of measures, with regard to any potential increase in CO₂ emission, which may compromise future objectives of the Climate Emergency Action Plan.
Change in Transport Strategy and Local	Change in Transport Strategy and Local Implementation Plan and Air Quality Action Plans will all have a significant bearing on each other. Every	<ul style="list-style-type: none"> • We will ensure that subsequent submissions of the plan contain policies to improve air quality, particularly in relation to sensitive receptors and designated AQMAs.

Appendix 3 - Equality Impact Assessment (EqIA)

Implementation Plan 2019-2041	<p>effort has been made to ensure that measures proposed in the Plans complement those in the AQAP. Conversely, Action Plans should be checked to ensure that they will not adversely affect the aims and objectives of Transport Plans.</p>	<ul style="list-style-type: none"> • This is addressed through the annual progress reports submitted in July each year. • We are promoting policies that will advance a modal shift from private vehicle to public vehicle use. • We encourage the implementation of Travel Plans.
Noise	<p>LBL to carry out an Assessment and Management of Environmental Noise. When implemented this will require an assessment of noise in major urban areas, and from major roads, airports and railways, through noise mapping.</p> <p>This will lead to the development of noise action plans; local authorities should consider what such an action plan might be and balance that against any Air Quality Action Plan.</p>	<ul style="list-style-type: none"> • We will ensure that measures in the AQAP do not adversely impact on noise levels, and that they will complement any future noise strategy.
Waste Management	<p>The resultant waste management strategies may impact on AQAPs and vice versa especially in AQMAs.</p>	<ul style="list-style-type: none"> • We will encourage and promote policies that seek to reduce traffic related impacts from waste transfer activities (waste traffic movements, dust re-suspension). • We will ensure that measures in the AQAP complement those in the Waste Strategy • and vice versa, for example in relation to siting of waste management facilities.
Non Air Quality Impacts	<p>Other potential non air quality impacts could include safety issues (road and personal safety), land-use development issues, financial implications, potential for increased Nuisance (e.g. noise), accessibility and visual amenity.</p>	<ul style="list-style-type: none"> • Consult widely with interest groups, the community, political decision makers and other stakeholders on specific measures and their potential impacts from the outset and use all the guidance available to us.
Perception by Industry and Commerce	<p>In the main, industry and commerce will perceive Air Quality Action Plans as an increased cost base for their business, unless offset by some other benefit. For example, a transport manager may feel negative about the cost of either retrofitting his fleet with low emission technology or replacing some of the vehicles with low emission types unless the spin-off is significant, e.g. priority access into central areas, reduced cost of vehicle excise licence etc.</p>	<ul style="list-style-type: none"> • LBL will have to promote the AQAP through the positive aspects with the industry in question, for example positive consequences for the public relations of the company if it is seen to be 'green'. • LBL will consider persuading companies that the health and well-being of their staff and the quality of the local environment in an AQMA should have a positive effect on recruitment and retention.
Perception by Politicians:	<p>Politicians will be looking at the balance between desirability and benefits of the schemes compared with public acceptance and support for them.</p>	<p>We have carried out the following actions:</p> <ul style="list-style-type: none"> • Examine the political acceptability of each proposed measure and stress positive aspects.

Appendix 3 - Equality Impact Assessment (EqIA)

		<ul style="list-style-type: none"> To ensure that the council is setting a good example by implementing AQAP measures in-house. Ensure politicians are aware of their legal obligations (i.e. they are required to designate AQMAs and draw up action plans and required to work towards the objectives).
Perception by Other Authority Functions, Regulators and Agencies	Different authority functions will require AQAP measures to complement and integrate within their specific departmental and corporate programmes and strategies. Good working relationships have been fostered between various LBL departments and external stakeholders.	<ul style="list-style-type: none"> There are Inter-links with other LBL policies, programmes and strategies within the Action Plan. Partnership working with other regulators and agencies, such as the Environment Agency, surrounding authorities is an integrated part of the action plan.
Practicability	It is important that measures proposed in the AQAP are practicable in order to gain the respect and involvement of other stakeholders in the development of the Action Plan or Strategy. The practicability of any single measure, or more usually, group of measures will be dependent not only on the perceptions of the groups outlined above, but also on local circumstances. This may be in relation to economics, geography, politics, the relationships with some of the key stakeholders involved or the presence of other complementary initiatives and measures.	<ul style="list-style-type: none"> We have and will continue to liaise with all internal and external stakeholders as well as LBL enforcement team for possible breaches.
<p>6. Mitigation As detailed above noted in 5.</p>		
<p>7. Key contacts</p> <p>Dr Eliane Foteu Environmental Protection Manager Environmental Protection Team Public Realm Housing, Regeneration and Public Realm Lewisham Council</p> <p>Direct line: 020 8314 46265 Mobile: 07834 145099E. ElianeScholastiq.foteumadio@lewisham.gov.uk EnvironmentalProtection@lewisham.gov.uk</p> <p>-----</p> <p>Dr Catherine Mbema Director of Public Health Public Health Community Services Directorate Lewisham Council</p>		

Appendix 3 - Equality Impact Assessment (EqIA)

Direct Line: 0208 314 3927
Mobile: 07725 143 060
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Head of Environmental Health
Housing, Regeneration and Public Realm Directorate
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0208 314 9369 | 07881 008077
aslam.baig@lewisham.gov.uk

Signature of Head of Service	
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Equal Opportunities Monitoring

Q11. Why are we asking you for this information?

The following monitoring questions help us to be fair and inclusive in the work that we do.

All of these questions are **optional** and you do not have to answer them.

The personal data that you do provide is used to help us understand who is sharing their views and influencing our decision-making, though your identity will remain anonymous.

This data is also used to ensure that nobody is discriminated against unlawfully in the provision of our functions and services.

Any personal data that you choose to share will be treated confidentially in accordance with the General Data Protection Regulations (GDPR).

Q12. What is your age?

Q13. What is your sex?

- Male Female
 Prefer not to say Other

Q14. What is your ethnicity?

- | | |
|--|--|
| <input type="checkbox"/> White - British | <input type="checkbox"/> White - Irish |
| <input type="checkbox"/> White - Gypsy or Irish Traveller | <input type="checkbox"/> White - Other |
| <input type="checkbox"/> Mixed - White and Black Caribbean | <input type="checkbox"/> Mixed - White and Black African |
| <input type="checkbox"/> Mixed - White and Asian | <input type="checkbox"/> Mixed - Other |
| <input type="checkbox"/> Asian - British | <input type="checkbox"/> Asian - Indian |
| <input type="checkbox"/> Asian - Pakistani | <input type="checkbox"/> Asian - Bangladeshi |
| <input type="checkbox"/> Asian - Chinese | <input type="checkbox"/> Asian - Other |
| <input type="checkbox"/> Black - British | <input type="checkbox"/> Black - African |
| <input type="checkbox"/> Black - Caribbean | <input type="checkbox"/> Black - Other |
| <input type="checkbox"/> Prefer not to say | |
| <input type="checkbox"/> Other (Please describe below) | |

If you have selected 'Other' then please describe your ethnicity in the box below:

Appendix 3 - Equality Impact Assessment (EqIA)

Q15. Disability

These questions relate to disability. Disability is defined in the law as a physical or mental impairment which has a sustained and long-term adverse effect on a person's ability to carry out normal day to day activities. This includes health conditions such as HIV, cancer and multiple sclerosis.

Do you consider yourself to be a disabled person?

Yes No Prefer not to say

Do you have any access requirements?

Yes No

If yes, please describe

Q16. What Ward do you live in?

- | | | | |
|---|-------------------------------------|---------------------------------------|---|
| <input type="checkbox"/> Bellingham | <input type="checkbox"/> Blackheath | <input type="checkbox"/> Brockley | <input type="checkbox"/> Catford |
| <input type="checkbox"/> Crofton Park | <input type="checkbox"/> Downham | <input type="checkbox"/> Evelyn | <input type="checkbox"/> Forest Hill |
| <input type="checkbox"/> Grove Park | <input type="checkbox"/> Ladywell | <input type="checkbox"/> Lee Green | <input type="checkbox"/> Lewisham Central |
| <input type="checkbox"/> New Cross | <input type="checkbox"/> Perry Vale | <input type="checkbox"/> Rushey Green | <input type="checkbox"/> Sydenham |
| <input type="checkbox"/> Telegraph Hill | <input type="checkbox"/> Whitefoot | <input type="checkbox"/> Don't know | <input type="checkbox"/> I don't live in Lewisham |

Thank you for taking part in this survey

More print copies of this consultation document are available at Lewisham, Deptford and Downham libraries. You can also request a print copy by emailing your name and address to:

EnvironmentalProtection@lewisham.gov.uk

You must submit your completed questionnaire no later than Tuesday 28 September 2021.

Copies of this consultation document can be collected from, and returned to, Lewisham, Deptford, or Downham libraries.

Alternatively you can post the completed document to:

London Borough of Lewisham, Environmental Protection, 9 Holbeach Road, Catford SE6 4TW

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GREATER **LONDON** AUTHORITY

Good Growth

Jennifer Daothong

Executive Director for Housing, Regeneration and Public Realm

Catherine Mbema

Director of Public Health London Borough of Lewisham

Department: Good Growth

Date: 11 February 2022

Via email

Approval of London Borough of Lewisham's Air Quality Action Plan

Dear Jennifer and Catherine,

Thank you for the submission of your Air Quality Action Plan (AQAP) to the GLA for final approval.

The plan is comprehensive, including all the actions required by the statutory London Local Air Quality Management framework and number of additional locally derived actions. It also includes a range of clear targets and deadlines, some of which were enhanced in response to feedback from GLA/TfL and your residents. Thank you for taking these comments on board.

I am happy to confirm that the AQAP is approved. Good luck with delivery of this plan, and we look forward to seeing progress outlined in your Annual Status Reports, which are due for submission to us at the end of May each year.

Kind regards,



Philip Graham

Executive Director

Good Growth

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Sustainable Development Select Committee

Report title: Non-Housing Assets - Update

Date: 27 June 2022

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Petra Marshall, Senior Programme Manager; Kplom Lotsu, Head of Capital Programme Delivery; Patrick Dubeck, Director of Inclusive Regeneration.

Outline and recommendations

This report provides a summary of the current work underway reviewing the Council's corporate operational and commercial assets. It provides an overview of the work beginning to develop a comprehensive, new Strategic Asset Management Plan, the processes in place to review key asset groupings, opportunities for disposal of land and assets that are not considered strategic, and the Corporate Estate Maintenance programme

The Sustainable Development Select Committee is asked to note the contents of the report, and in particular, the outline Strategic Asset Management Plan (SAMP) and provide feedback.

Timeline of engagement and decision-making

No formal decision-making to note

1. Summary

- 1.1. The Council's effective utilisation of assets is critical to supporting the delivery of a range of services and to many of the Council's emerging corporate plan objectives. This report provides a summary of the current work underway reviewing the Council's corporate operational and commercial assets. It provides an overview of the work beginning to develop a comprehensive, new Strategic Asset Management Plan, the processes in place to review key asset groupings, opportunities for disposal of land and assets that are not considered strategic, and the Corporate Estate Maintenance programme.

2. Recommendations

- 2.1 That the Sustainable Development Select Committee note the contents of the report which updates on current work on Council assets, in particular the emerging Strategic Asset Management Plan (SAMP) and provides feedback.

3. Policy Context

- 3.1. The Council's asset base supports a wide range of functions and services. This includes office accommodation, community facilities, adult learning, libraries, bereavement services, education and children services, housing, social care and health provision. The estate provides important Council income via commercial lettings. As such, the Council's assets have directly contributed to the delivery of the Council's Corporate Strategy 2018-2022 and its seven corporate priorities:

- Open Lewisham
- Tackling the housing crisis
- Giving children and young people the best start in life
- Building an inclusive local economy
- Delivering and defending: health, social care and support
- Making Lewisham greener
- Building safer communities

- 3.2 Many of the emerging priorities in the developing new Corporate Strategy will equally, be dependent of a strong asset management plan that maximises utilisation of our estate.

4. Background – Council Assets

- 4.1. There are approximately 860 assets within the Council's non-housing asset register. This does not include Housing Revenue Account (HRA) assets, but covers the commercial, corporate and schools estate held within the General Fund (GF). It also includes assets held by the Catford Regeneration Partnership Limited (CRPL), the Council's wholly owned company.
- 4.2. The non-housing portfolio includes assets mainly used to deliver; the Council's civic functions (offices, libraries, depot, hostels etc), help discharge statutory obligations (e.g. schools), generate revenue income stream (retail units, light industrial sites etc) and help deliver specific corporate objectives. These assets are held and accounted for by the various services and directorates using them. For example, schools assets are held by the Directorate for Children and Young People, while offices and civic buildings and the operational estate are maintained by the Directorate for Corporate Resources. The

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Directorate for Housing Regeneration and Public Realm holds ‘corporate landlord’ responsibility for all assets and has a key role in ensuring the use of assets is optimised to support the delivery of corporate objectives.

- 4.3. Alongside the core non-housing estate is a Council garage portfolio of approximately 1500 individual garage units across a number of estates and sites. Although this portfolio is tenanted and managed by Lewisham Homes, overall responsibility lies with the Council’s Property & Estates team within the Housing Regeneration and Public Realm Directorate.
- 4.4. The table below provides a breakdown of the Council’s current non-housing asset portfolio grouped broadly according to use type. This excludes the garage portfolio noted above.

Asset Category	No.	%
Commercial (including CRPL portfolio)	313	36%
Operational	151	18%
Land holdings	143	17%
Schools estate	98	11%
Parks / Open Spaces	100	12%
Others (inc. hostels, allotments)	53	6%
Total	858	

- 4.5. The Council is required to publish a register of assets it owns as part of the transparency agenda. A full list of the register is published on the Council’s website and can be found here: <https://lewisham.gov.uk/myservices/planning/landandpremises/council-land-and-premises>

5. Strategic Asset Management Plan (SAMP)

- 5.1 The previous Strategic Asset Management Plan (SAMP) covered the period 2015-2020. A new strategic plan is needed, which will cover the use and management of the Council’s assets, ensuring a consistent corporate approach is taken to inform Council decision making processes. Work is ongoing to review priority assets including considering future use, disposals and reducing finances, and therefore it is important the Council has a strategy that sets out its approach. This will better enable officers to recommend decisions around future use and maintenance of assets, and ensure resources are spent in the best way possible.
- 5.2 The SAMP document will be prepared during 2022-23 and will run from 2023 – 2028.
- 5.3 The Inclusive Regeneration division will deliver the SAMP, leading engagement and gathering direct input from relevant services, with oversight provided by the Council’s Asset Review and Regeneration and Capital Boards. It will be a cross-directorate owned strategy, ensuring that future service needs are met and priorities for investment and maintenance in or rationalisation of our existing estate are identified.
- 5.4 The full scope of the SAMP is currently being developed, however it will include the following areas: current asset base; acquisition and investment approach; accommodation strategy; sustainability and carbon reduction; as well as disposal strategy and process. The SAMP will also review the community and third sector use of Council assets in its varied forms together with wider public sector partnerships and the opportunities to maximise the utility of public estate.
- 5.5 The SAMP will recognise and align with a detailed asset management plan for the HRA estate, informed by the soon to be finalised HRA business plan and building on Lewisham Homes’ current asset strategy.

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- 5.6 As noted, the SAMP is a medium term strategy to be developed in 2022/23 and sets how the Council's assets will be used and managed to best effect in furthering objectives of the Council. In the meantime and in support of the strategy, a number of workstreams are underway in parallel to this strategy. A summary of these, including a review of community use of Council assets; approach to disposals; and a council-wide asset review is summarised below.
- 5.7 The corporate estate maintenance programme (CEMP) invests in and maintains the Council's asset base. £4.9m from the Capital Programme has been committed across 2020 – 2024 and covers approximately 70 buildings. Benefits of the programme include less interruptions to critical operations due to building or equipment failure, longer asset life, improved efficiency and energy performance, increased safety and compliance, and reduced repair costs. Running parallel to the CEMP has been the delivery of Public Sector Decarbonisation Scheme (PSDS) funded improvements to selected corporate buildings. The SAMP will be important to informing the CEMP and future applications for PSDS funding, ensuring prioritisation of funding in the right places, and informing the Council's longer term capital strategy. In turn the CEMP (and its associated condition surveys) will help provide evidence on the condition of assets under review and the investment required.

6. Community use of assets

- 6.1 The Council uses a number of its property assets to support the voluntary and community sector (VCS). The assistance is sometimes direct by offering a fully maintained facility or in other cases assisting with concessionary / peppercorn rents. The use of Council buildings by the VCS is underpinned by a 2014/15 review of Community Sector portfolio and a subsequent policy on the VCS use of Council assets.
- 6.2 As part of the SAMP, community use of assets will be considered. Our policy on the VCS use of Council assets recognises the value generated by the sector and that enabling access to assets is a form of support. As well as being directly involved in delivering services to citizens in the borough, VCS organisations also provide the essential infrastructure to enable the sector as a whole to develop and support individual citizens to be able to play an active role within their local communities.
- 6.3 Some tenancy arrangements for community uses are long held and there are inconsistencies in the value attached to tenancies (e.g. peppercorn leases), Council responsibility for repairs and maintenance, and access to discretionary rate relief.
- 6.4 Work in the SAMP will be undertaken collaboratively with Community Services to ensure a more consistent approach to third sector use of community assets and regularisation of tenancy arrangements for community occupied assets, whilst better recognising the value provided by community sector use and occupation of the Council estate.
- 6.5 Due to the historic nature of some of these uses, a number of third party uses of Council assets are at less than market rate. For example, whilst most nurseries occupy Council assets on commercial leases, a few only pay a modest rent due to historic agreements. There are also certain operational assets that are likely to be no longer required for their existing purposes, and could therefore be re-let on a commercial basis. The review and regularising of community access and use of Council assets (as set out in the agreed budget savings proposal under "Asset Optimisation" D-12) will not only ensure more effective and efficient use of assets to deliver current Council objectives, but also target

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an additional net income to the Council.

7. Asset Review

- 7.1 Following a mandate from EMT in summer 2020, officers are carrying out a review across the Council's corporate, operational and office estate. The review seeks to identify prioritised opportunities to enable better utilisation of the Council's assets, land supply for housing development and to enable service transformation. It will also identify assets where disposal is considered an opportunity to provide capital receipt for the Capital Programme and reinvestment in core Council objectives. It will enable a more strategic approach to management and utilisation of assets, ensuring reducing capital budget for maintenance and investment are focused on key buildings which are 'sweated' as best they can be. It will also enable rationalisation of office and service delivery space, particularly as staff working habits and the way in which services are delivered change.
- 7.2 In the short term, the review is concentrating on a small number of assets and sites. In the medium term, in line with the SAMP, the ongoing asset review work will continue to look across the estate to ensure efficient and appropriate use which maximises social, economic and monetary value.
- 7.3 As part of the asset review officers undertake an options appraisal to fully explore all possible outcomes for an asset. One of the options for consideration is disposal. Disposals enable capital receipts to support the Capital Programme, reduce the maintenance and running cost liability for the Council, release land for an alternative use, such as housing and reduce the estate to a manageable and efficient size. The capital receipt generated can then be re-invested in other buildings which better meet the needs of the Council and its residents.
- 7.4 An Asset Disposal Process has been drafted which sets out the steps needed to be undertaken when declaring a General Fund (GF) or Housing Revenue Fund (HRA) asset surplus to requirements and subsequently disposing of it. The process is consistent with the Council's commitment not to dispose of strategic assets. Asset disposal is part of a range of tools or approaches which ensures effective asset management, therefore a clear process is required to ensure assets are disposed of in a structured and controlled way, to ensure best value for the Council and no long-term negative impact.
- 7.5 The process includes a series of questions that need to be satisfied before disposal is considered including exploring whether the asset can be commercially let, whether it sits adjacent to or within a housing estate that may be subject to renewal in the future, whether the site is of a strategic nature, and whether it could be developed or refurbished for specialist housing or temporary accommodation. Financial modelling includes the following factors for consideration: loss of income, running cost savings, land value and net present value (NPV) etc. The timing of disposal is also considered, along with the most appropriate method of disposal including public sector partners.
- 7.6 An Officer Board has been set up to support the Asset Review. The purpose of the Board is to challenge, scrutinise and drive forward the asset review and ensure it delivers its agreed outcomes and benefits. It will also oversee the development of the SAMP as well as reviewing demands on our infrastructure and assets and how this will change over time, taking into account economic, political and social pressures.

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8. Commercial estate

- 8.1. There are approximately 313 number of properties in the Council's commercial estate generating a total income of approximately £3M a year. This is in addition to the circa 1500 individual garage units generating a further £1.3M a year.
- 8.2. The commercial estate consists of mostly secondary and tertiary parades, often on Council estates around the borough. Most of the retail parades are situated beneath residential blocks or on estates. The best performing retail parades are at Evelyn Street, New Cross Road and Randlesdown Road. The portfolio also includes a number of light industrial units located at Forest Hill and a number of nurseries dispersed across the borough.
- 8.3. There are also a number of offices within the general commercial estate, with the main one being the Old Town Hall in Catford, where five of the six floors are leased to public sector partners including DWP (Job Centre), Ingeus, SLAM, Lewisham and Greenwich NHS Trust. The last floor is used by a work space provider to support low cost office and work space provision for start-up businesses.
- 8.4. Included within the commercial estate is the Catford Regeneration Partnership Limited (CRPL) property portfolio. This is managed separately to the main Council portfolio and includes Winslade Way shopping centre, various retail units on Catford Broadway and Rushey Green and approximately 20 residential properties above retail units, let separately on Assured Shorthold tenancies. The approach here is a short to medium term management of the portfolio in a way which supports the Council's long term regeneration objectives for the town centre.

9. Financial implications

- 9.1. There are no direct financial implications arising from this report; however the contents outline how the asset review will help generate revenue savings, reduced running costs, capital receipt and support strategic service delivery.

10. Legal implications

- 10.1. There are no direct legal implications arising from this report. Any assets subject to potential disposal or alternative use will have to follow the Council's constitution and any statutory requirements.

11. Equalities implications

- 11.1. Due regard to equalities will be considered when making decisions on assets, and where required Equality Analysis Assessments may need to be undertaken by services who are changing their offer. This will be considered on an asset by asset basis.

12. Climate change and environmental implications

- 12.1. There are no direct climate change and environmental implications arising from this report, however environmental consideration will be addressed in any capital project that takes places in the Council's estate. The CEMP and the PSDS funded works seek to decarbonise corporate buildings and make improvements which reduce utility consumption, make buildings more efficient and contribute towards the Council's target

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to be carbon neutral by 20230.

13. Crime and disorder implications

13.1. There are no direct crime and disorder implications arising from this report.

14. Health and wellbeing implications

14.1. There are no direct health and wellbeing implications arising from this report.

15. Glossary

Term	Definition
NPV	Net present value
VCS	Voluntary and community sector
SAMP	Strategic Asset Management Plan
CEMP	Corporate Estate Maintenance Programme
PSDS	Public Sector Decarbonisation Scheme

16. Report author and contact

16.1. Petra Marshall, Senior Programme Manager, 0208 314 7034,
petra.marshall@lewisham.gov.uk

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Sustainable Development Select Committee

Select Committee work programme report

Date: 27 June 2022

Key decision: No.

Class: Part 1 (not restricted)

Wards affected: All (none specific)

Contributor(s): Assistant Chief Executive (Scrutiny Manager)

Outline and recommendations

To ask members to discuss the Committee's priorities for the 2022/23 municipal year and to agree an annual work programme.

The Committee is asked to:

- Consider the potential items set out in the draft work programme at appendix E.
- Consider the policy context: the corporate strategy and 'Future Lewisham'
- Discuss the Committee's priorities and agree a work programme for 2022-23.
- Note opportunities for public engagement, site visits and expert witnesses.
- Appoint a climate change champion for the Committee.

Timeline of engagement and decision-making

The meeting dates below were agreed at the Council annual general meeting on 25 May 2022:

- Monday 20 June 2022 (subsequently changed)
- Thursday 8 September 2022
- Wednesday 30 November 2022
- Tuesday 10 January 2023
- Tuesday 7 March 2023

1. Summary

- 1.1. This report asks members to discuss and agree priorities for the Committee's work programme for the year ahead and describes the process for approval by the Business Panel and ongoing monitoring by the Committee.

2. Recommendations

- 2.1. The Committee is asked to:
 - Consider the potential items set out in the draft work programme at appendix E.
 - Consider the policy context: the corporate strategy and 'Future Lewisham'.
 - Discuss the Committee's priorities and agree a work programme for 2022-23.
 - Note opportunities for public engagement, site visits and expert witnesses.
 - Appoint a climate change champion for the Committee.

3. The role of the select committee

- 3.1. The role of the Sustainable Development Select Committee is to monitor the provision of the Council's planning, regeneration and environmental services functions. This includes: scrutinising the delivery of the Council's refuse and recycling services, the development of key planning policies and the performance of the Council's activities to meet the climate challenge as well as examining other key Sustainable Development related matters. It also has a role in engaging and reflecting the views of residents in relation to sustainable development-related matters. This includes, for example, the provision of the Council's parks and green spaces services, street lighting and jobs, business support and employment functions.
- 3.2. The Committee's full terms of reference are set out in appendix A.

4. Different types of scrutiny

- 4.1. It is important to think early on about the most effective way to scrutinise each item on the work programme. Some issues may only require an initial briefing, circulated by email, for information, some may require site visits and public engagement, and others may require detailed questioning at a formal Committee meeting and input from stakeholders.
- 4.2. The Effective Scrutiny Guidelines at appendix C set out 5 key principles to take into account when carrying out scrutiny: prioritise; be independent; work collectively; engage; make SMART¹ recommendations. This will help the Committee decide on the most appropriate approach for the issue at hand.
- 4.3. Members should also note the comments in the [Local Democracy Review](#) about how scrutiny can be even more effective, participative and open. Suggestions included:
 - Focusing on fewer issues more closely linked to Council priorities
 - More engagement with the public outside of formal meetings
 - Individual scrutiny members leading on defined topic areas

¹ Specific, Measurable, Achievable, Relevant, Time-bound, see: https://en.wikipedia.org/wiki/SMART_criteria and appendix C for context and further information.

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- Contributing to new policy proposals at an early stage
- 4.4. Some of the most common scrutiny methods are described below, but members are encouraged to try new ways of gathering evidence and engaging the public.

Standard items

- 4.5. The majority of work programme items tend to be standard items, where scrutiny is carried out as part of a single meeting with members:
- agreeing in advance the information and analysis needed
 - receiving an officer report presenting the relevant information
 - gathering additional evidence from activity outside of meetings
 - asking questions of the presenting officers or expert guests
 - agreeing recommendations to Mayor and Cabinet and partners.

Policy development

- 4.6. When the Council is due to renew a policy the Committee may be asked to consider the options available and officer recommendations before a decision by Mayor and Cabinet. Select committees should be engaged at an early enough stage to be able to influence and contribute to the new policy.

Performance monitoring

- 4.7. Scrutiny can request a wide range of performance information to examine the effectiveness of Council services. This includes monitoring data on key performance indicators and outcomes and assessing the delivery of particular programme or projects against set targets or timescales.

Task and finish groups

- 4.8. For issues that require more extensive evidence gathering, members may put forward a proposal for a task and finish group. The purpose of these groups is to gather in-depth information over a set time period in order to make recommendations on a carefully defined issue. The Overview and Scrutiny Committee will agree which task and finish groups should be established, their membership, terms of reference and duration. Task and finish groups are independent of select committees and make recommendations directly to Mayor and Cabinet.

Information items

- 4.9. Some low-priority items may only require a briefing report to be circulated to Committee members by email, with questions put to the report author for written response. There is no provision for discussion of information items at Committee meetings.

5. Agreeing the Committee's work programme

- 5.1. A draft work programme is attached at appendix E. It currently includes:
- suggestions made by the Committee at the last meeting of 2021-22
 - issues arising as a result of previous scrutiny
 - suggestions from Council officers.
- 5.2. However, the Committee should decide on its own priorities and set its own work programme. The Committee does not have to look into everything officers, the public or other members suggest.
- 5.3. When deciding on issues to include in the work programme, the Committee should consider the key services and programmes within the Committee's remit, the criteria for selecting and prioritising topics (see flowchart below), upcoming Mayor and Cabinet

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decisions (appendix D) and avoid duplicating the work of any agreed task and finish groups.

- 5.4. The Corporate Strategy 2018-22 sets out how the Council will deliver for its residents up to 2022. The Corporate Strategy provides an overarching framework and focus for all council business; and items within the Committee's work programme should be linked to the priorities in the strategy (appendix B). A new Corporate Strategy is currently in development, which will include a refreshed set of priorities and describe how the Council will address the social, economic and environmental challenges facing the borough up to 2026. Once this is in place, the Committee may wish to review its work programme in light of the new strategy.
- 5.5. The Committee should also note and take into account the four strategic themes of the borough's Covid-19 recovery plan, Future Lewisham, which support what we want for every single resident and that we know are what we need to focus on locally: An economically sound future; A healthy and well future; A greener future; and a future we all have a part in.
- 5.6. The Committee is advised to schedule two substantive items per meeting to allow enough time for detailed discussions and the involvement of any invited witnesses or guests and to leave space for any Mayor and Cabinet responses that may arise throughout the year. The Committee should be responsive and if urgent business arises throughout the year the work programme can be amended with urgent business added and lower priority business removed.
- 5.7. Provision is made for meetings to last for up to 2.5 hours, but the Committee should aim to manage its business within 2 hours. In exceptional cases the Committee may decide to suspend standing orders and extend the meeting for a further 30 minutes to conclude any urgent business.
- 5.8. The Committee should specify the information it would like for each item to ensure that officer reports and other evidence meets its needs. This should be done under the work programme item at every meeting.
- 5.9. There is no provision at Committee for the discussion of information items (reports to note). If required, they will be circulated to members by email with questions put to the report author for a written response.
- 5.10. Some of the regular reports that fall under the Committee's remit, which are presented as reports to note and are circulated to members by email in the first instance, include the following. They are only taken as substantive items if wider engagement and scrutiny would add value, in line with the prioritisation process below.
 - The regeneration of Catford Town Centre update
 - Annual parking report
 - Major planning developments update
 - Biodiversity action plan update
- 5.11. The following suggestions for the work programme have been put forward by members or officers, or have arisen as a result of previous scrutiny. They have been added to the provisional work programme attached at Appendix E, but it is up to the Committee to decide whether or not these items should be included in the final work programme.
- 5.12. Suggestions made by the Committee at the last meeting of 2022-23
 - Flood management strategy
 - Air quality action plan

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5.13. Suggestions from officers in view of forthcoming developments

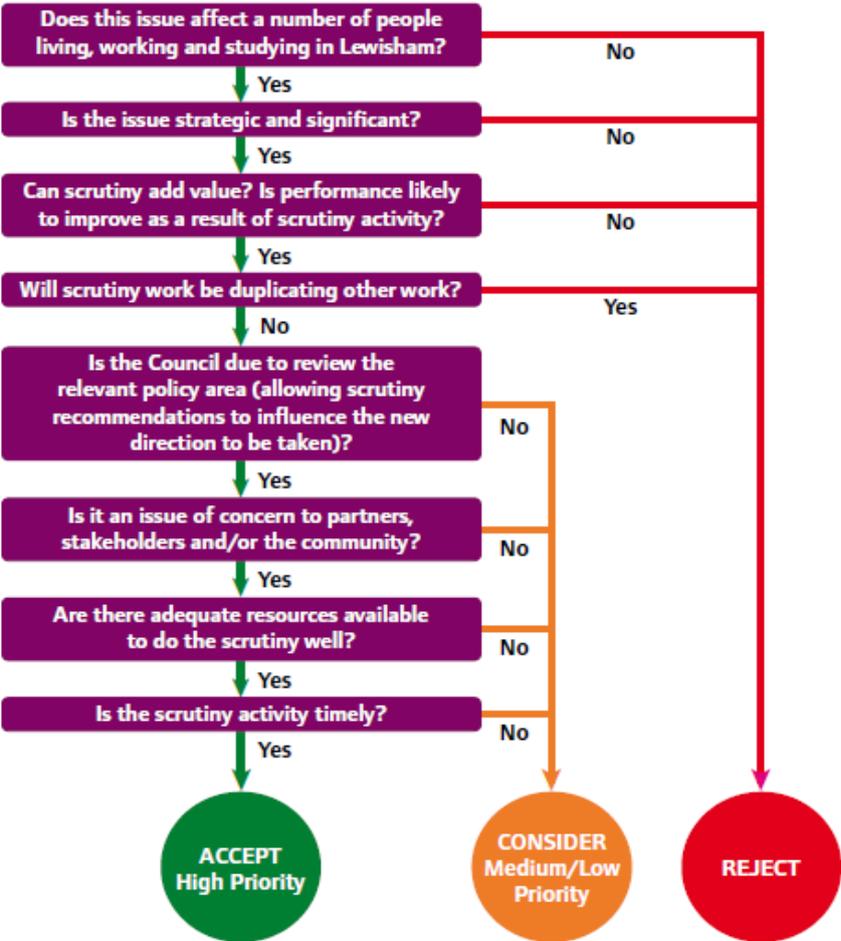
- Asset management
- Controlled parking zone programme
- Parks and open spaces: insourcing update

5.14. Issues arising as a result of previous scrutiny

- Local plan update
- Climate emergency action plan
- Implementation of the transport strategy: walking, cycling and healthy neighbourhoods

5.15. It is the Chair’s responsibility to keep abreast of developments within the Committee’s remit, liaise regularly with the relevant cabinet member(s) and escalate any issues that require action by the Committee to the work programme as appropriate.

Scrutiny work programme – prioritisation process



6. Approval and ongoing monitoring of the work programme

- 6.1. Each select committee is required to submit its work programme to the Overview and Scrutiny Business Panel for approval. This is to ensure a coordinated overview and scrutiny work programme across select committees that avoids duplication of effort and supports effective scrutiny. The Business Panel will meet on 19 July 2022.
- 6.2. The Committee's work programme can be reviewed at each meeting to allow urgent items to be added and lower priority issues to be removed. Any potential items should be considered against the priority criteria outlined earlier in this report. If a high-priority item is included, a lower-priority item should be removed. The Committee's work programme must be achievable in the time available.

7. Financial implications

- 7.1. There are no direct financial implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme will have financial implications and these will need to be considered as part of the reports on those items

8. Legal implications

- 8.1. In accordance with the Council's Constitution, all scrutiny select committees must devise and submit a work programme to the Business Panel at the start of each municipal year.

9. Equalities implications

- 9.1. Equality Act 2010 brought together all previous equality legislation in England, Scotland and Wales. The Act included a new public sector equality duty, replacing the separate duties relating to race, disability and gender equality. The duty came into force on 6 April 2011. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 9.2. The Council must, in the exercise of its functions, have due regard to the need to:
 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 9.3. There may be equalities implications arising from items on the work programme and all activities undertaken by the Select Committee will need to give due consideration to this.

10. Climate change and environmental implications

- 10.1. There are no direct climate change or environmental implications arising from the implementation of the recommendations in this report. However, in February 2019 Lewisham Council declared a Climate Emergency and proposed a target to make the borough carbon neutral by 2030. An action plan to achieve this target was subsequently agreed by Mayor and Cabinet (following pre-decision scrutiny by the

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Sustainable Development Select Committee)². The plan incorporates all areas of the Council's work. Items on the work programme may well have climate change and environmental implications and reports considered by the Committee should acknowledge this.

11. Crime and disorder implications

- 11.1. There are no direct crime and disorder implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme may have crime and disorder implications and these will need to be considered as part of the reports on those items.

12. Health and wellbeing implications

- 12.1. There are no direct health and wellbeing implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme may have health and wellbeing implications and these will need to be considered as part of the reports on those items.

13. Report author and contact

- 13.1. If you have any questions about this report then please contact: Timothy Andrew (Scrutiny Manager) timothy.andrew@lewisham.gov.uk 020 8314 7916

14. Appendices

Appendix A – [Committee terms of reference](#) (see below)

Appendix B – [Council corporate priorities](#) (see below)

Appendix C – Effective scrutiny principles (see below)

Appendix D – Notice of forthcoming executive decisions (see attached)

Appendix E – Draft work programme (see attached)

² See <https://lewisham.gov.uk/TacklingTheClimateEmergency> for a summary of the Council's work in this area.

Appendix A

The following roles are common to all select committees:

(a) General functions

- To review and scrutinise decisions made and actions taken in relation to executive and non-executive functions
- To make reports and recommendations to the Council or the executive, arising out of such review and scrutiny in relation to any executive or non-executive function
- To make reports or recommendations to the Council and/or Executive in relation to matters affecting the area or its residents
- The right to require the attendance of members and officers to answer questions includes a right to require a member to attend to answer questions on up and coming decisions

(b) Policy development

- To assist the executive in matters of policy development by in depth analysis of strategic policy issues facing the Council for report and/or recommendation to the Executive or Council or committee as appropriate
- To conduct research, community and/or other consultation in the analysis of policy options available to the Council
- To liaise with other public organisations operating in the borough – both national, regional and local, to ensure that the interests of local people are enhanced by collaborative working in policy development wherever possible

(c) Scrutiny

- To scrutinise the decisions made by and the performance of the Executive and other committees and Council officers both in relation to individual decisions made and over time
- To scrutinise previous performance of the Council in relation to its policy objectives/performance targets and/or particular service areas
- To question members of the Executive or appropriate committees and executive directors personally about decisions
- To question members of the Executive or appropriate committees and executive directors in relation to previous performance whether generally in comparison with service plans and targets over time or in relation to particular initiatives which have been implemented
- To scrutinise the performance of other public bodies in the borough and to invite them to make reports to and/or address the select committee/Business Panel and local people about their activities and performance
- To question and gather evidence from any person outside the Council (with their consent)
- To make recommendations to the Executive or appropriate committee and/or Council arising from the outcome of the scrutiny process

(d) Community representation

- To promote and put into effect closer links between overview and scrutiny members and the local community
- To encourage and stimulate an enhanced community representative role for overview and scrutiny members including enhanced methods of consultation with local people
- To liaise with the Council's ward assemblies so that the local community might participate in the democratic process and where it considers it appropriate to seek the views of the ward assemblies on matters that affect or are likely to affect the local areas, including accepting items for the agenda of the appropriate select committee from ward assemblies.
- To keep the Council's local ward assemblies under review and to make recommendations to the Executive and/or Council as to how participation in the democratic process by local

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people can be enhanced

- To receive petitions, deputations and representations from local people and other stakeholders about areas of concern within their overview and scrutiny remit, to refer them to the Executive, appropriate committee or officer for action, with a recommendation or report if the committee considers that necessary
- To consider any referral within their remit referred to it by a member under the Councillor Call for Action, and if they consider it appropriate to scrutinise decisions and/or actions taken in relation to that matter, and/or make recommendations/report to the Executive (for executive matters) or the Council (non-executive matters).

(e) Finance

- To exercise overall responsibility for finances made available to it for use in the performance of its overview and scrutiny function.

(f) Work programme

- As far as possible to draw up a draft annual work programme in each municipal year for consideration by the overview and scrutiny Business Panel. Once approved by the Business Panel, the relevant select committee will implement the programme during that municipal year. Nothing in this arrangement inhibits the right of every member of a select committee (or the Business Panel) to place an item on the agenda of that select committee (or Business Panel respectively) for discussion.
- The Council and the Executive will also be able to request that the overview and scrutiny select committee research and/or report on matters of concern and the select committee will consider whether the work can be carried out as requested. If it can be accommodated, the select committee will perform it. If the committee has reservations about performing the requested work, it will refer the matter to the Business Panel for decision.

In addition to the general terms of reference outlined above, the Sustainable Development Select Committee has the following specific terms of reference:

- to examine issues relating to the protection of the environment including 'green' issues such as the conservation of natural resources, air quality, energy efficiency and conservation and/or the reduction of all types of pollution and make recommendations to the Mayor and Cabinet as appropriate;
- to comment and consult on and make recommendations to the Mayor and Cabinet in relation to the following:
 - i. sustainable development, economic development, business support, employment and training;
 - ii. the formulation of the Council's planning policies, (including the preparation of the Council's Local Development Documents and other local plans for the use and development of land, but excluding planning control and building control functions);
 - iii. highways, parking, traffic and transport, and urban regeneration;
 - iv. the environment including waste disposal, environmental health, street and market trading (but not the granting of licences and related matters);
 - v. public protection, refuse collection and disposal, street cleaning, consumer protection, cemeteries and crematoria;
 - vi generally to examine the performance of the Mayor and Cabinet in relation to the matters listed at (i) to (v) above.
- the review and scrutiny of the exercise by risk management authorities of flood risk management and coastal erosion risk management affecting the area.

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Appendix B

Council corporate priorities 2018-2022

Items within the work programme should be linked to the priorities of the Council's Corporate Strategy for 2018-2022 (set out below):

Open Lewisham - Lewisham is a welcoming place of safety for all, where we celebrate the diversity that strengthens us.

Tackling the Sustainable Development crisis - Everyone has a decent home that is secure and affordable.

Giving children and young people the best start in life - Every child has access to an outstanding and inspiring education, and is given the support they need to keep them safe, well and able to achieve their full potential.

Building an inclusive local economy - Everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.

Delivering and defending: health, social care and support - Ensuring everyone receives the health, mental health, social care and support services they need.

Making Lewisham greener - Everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.

Building safer communities - Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

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Appendix C

Effective Scrutiny Guidelines

At Lewisham we:

1. Prioritise

It is more effective to look at a small number of key issues in an in-depth way, than skim the surface of everything falling within scrutiny's remit. We try to focus on issues of concern to the community and/or matters that are linked to our corporate priorities. We only add items to the work programme if we are certain our consideration of the matter will make a real and tangible difference.

2. Are independent

Scrutiny is led by Scrutiny Members. Scrutiny Members are in charge of the work programme and, for every item, we specify what evidence we require and what information we would like to see in any officer reports that are prepared. We are not whipped by our political party or unduly influenced by the Cabinet or senior officers.

3. Work collectively

If we collectively agree in advance what we want to achieve in relation to each item under consideration, including what the key lines of enquiry should be, we can work as a team to question witnesses and ensure that all the required evidence is gathered. Scrutiny is impartial and the scrutiny process should be free from political point scoring and not used to further party political objectives.

4. Engage

Involving residents helps scrutiny access a wider range of ideas and knowledge, listen to a broader range of voices and better understand the opinions of residents and service users. Engagement helps ensure that recommendations result in residents' wants and needs being more effectively met.

5. Make SMART evidence-based recommendations

We make recommendations that are based on solid, triangulated evidence – where a variety of sources of evidence point to a change in practice that will positively alter outcomes. We recognise that recommendations are more powerful if they are:

- Specific (simple, sensible, significant).
- Measurable (meaningful, motivating).
- Achievable (agreed, attainable).
- Relevant (reasonable, realistic and resourced, results-based).
- Time bound (time-based, time limited, time/cost limited, timely, time-sensitive).

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FORWARD PLAN OF KEY DECISIONS

Forward Plan July 2022 - October 2022

This Forward Plan sets out the key decisions the Council expects to take during the next four months.

Anyone wishing to make representations on a decision should submit them in writing as soon as possible to the relevant contact officer (shown as number (7) in the key overleaf). Any representations made less than 3 days before the meeting should be sent to Kevin Flaherty 0208 3149327, the Local Democracy Officer, at the Council Offices or kevin.flaherty@lewisham.gov.uk. However the deadline will be 4pm on the working day prior to the meeting.

A "key decision"* means an executive decision which is likely to:

- (a) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates;
- (b) be significant in terms of its effects on communities living or working in an area comprising two or more wards.

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
February 2022	Leisure Contract Extension	15/06/22 Mayor and Cabinet	James Lee, Director of Communities, Partnerships and Leisure and Councillor Andre Bourne, Cabinet Member for Culture and Leisure (job share)		
November 2021	Blackheath Joint Events Policy 2022-2027	15/06/22 Mayor and Cabinet	Nick Pond, Parks and Open Space Contracts and Service Development Manager and Patrick Codd, Assistant to the Executive		
February 2022	Out of Hours Switchboard	15/06/22 Mayor and Cabinet	Mark Ferris and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Authority to procure a new contract for 0-19 Public Health Nursing (Health Visiting and School Health Service	15/06/22 Mayor and Cabinet	Emily Newell, Joint Commissioner 0-19 Health and Maternity and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
May 2022	Levelling Up Fund bid	15/06/22 Mayor and Cabinet	John Bennett, Head of Economy, Jobs and Partnerships and Councillor Kim Powell, Cabinet Member for Businesses, Jobs and Skills		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
May 2022	Building for Lewisham - Ladywell Update Part 1 & 2	15/06/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Energy Grants, Covid Additional relief Fund (CARF) scheme and Household Support Fund updates	15/06/22 Mayor and Cabinet	Mick Lear, Service Manager, Benefits and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Compute & Storage Infrastructure Replacement	15/06/22 Mayor and Cabinet	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Permission to tender (Mental Health Supported Housing)	15/06/22 Mayor and Cabinet	and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
November 2021	Award of Corporate Estate Maintenance Programme Phases 1 & 2 works contract	28/06/22 Executive Director for Housing, Regeneration & Environment	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
January 2022	Contract for Statutory Funeral Provision	28/06/22 Executive Director for Community Services	Corinne Moocarme, Joint Commissioning Lead, Community Support and Care, Community		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Services, LBL and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
May 2022	Catford Library Winslade Way works - Contract Award	28/06/22 Executive Director for Corporate Services	Kplom Lotsu, SGM Capital Programmes and Councillor Andre Bourne, Cabinet Member for Culture and Leisure (job share)		
May 2022	Procurement of Learning and Development Services Provider	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Digital Infrastructure Fibre Wayleave	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Expert Assessors Services for Concessionary Award Services	28/06/22 Executive Director for Corporate Services	and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Procurement of Replacement Housing Management System and implementation of Customer Relationship Management System	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Expert Assessors services for Concessionary Award	28/06/22 Executive Director	and Councillor Chris Barnham, Cabinet		

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	Schemes	for Corporate Services	Member for Children's Services and School Performance		
May 2022	Procurement of a replacement Housing Management System and implementation of a Customer Relationship Management System.	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
January 2022	Location Priority Procurement Strategy	06/07/22 Mayor and Cabinet	Ella McCarthy, Housing Partnership and Insight Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
January 2022	Request to extend the Extra Care Housing Support Contract for Conrad Court, Marine Wharf, Deptford.	06/07/22 Mayor and Cabinet	Heather Hughes, Joint Commissioner, Learning Disabilities and Councillor Chris Best		
January 2022	Extra Care Housing Support Contract for Cinnamon Court, Deptford and Cedar Court Grove Park.	06/07/22 Mayor and Cabinet	Heather Hughes, Joint Commissioner, Learning Disabilities and Councillor Chris Best		
February 2022	Building for Lewisham Budget requirements	06/07/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
November 2021	Housing Infrastructure Funding A205 Realignment	06/07/22 Mayor and Cabinet	Patrick Dubeck, Director of Inclusive Regeneration		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			and Patrick Codd, Assistant to the Executive		
January 2022	Permission to Procure Extra Care Housing at Hazelhurst Court	06/07/22 Mayor and Cabinet	Heather Hughes, Joint Commissioner, Learning Disabilities and Councillor Chris Best		
May 2022	Permission to Procure (Stop Smoking Contract)	06/07/22 Mayor and Cabinet	and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
February 2022	Building for Lewisham Appropriation for Planning	06/07/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
November 2021	Lewisham Air Quality Action Plan 2022-2027	06/07/22 Mayor and Cabinet	Eliane Foteu, Environmental Protection Manager and Patrick Codd, Assistant to the Executive		
October 2021	Approval of Flood Risk Management Strategy 2022-27	06/07/22 Mayor and Cabinet	Martin O'Brien, Climate Resilience Manager and Patrick Codd, Assistant to the Executive		
November 2021	New Cross Road Acquisition	06/07/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Health and		

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Adult Social Care		
May 2022	5th Annual Besson Street Business Plan	06/07/22 Mayor and Cabinet	Angela Bryan, Strategic Development Officer and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Approval for the Local Development Scheme (LDS)	06/07/22 Mayor and Cabinet	David Syme, Head of Strategic Planning and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Approval of the Lewisham Local Plan - Regulation 19 Proposed Submission document for public consultation	06/07/22 Mayor and Cabinet	David Syme, Head of Strategic Planning and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Approval for the making of an Article 4 Direction E to class C3	06/07/22 Mayor and Cabinet	David Syme, Head of Strategic Planning and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Approval for the making of an Article 4 Direction C3 to Class	06/07/22 Mayor and Cabinet	David Syme, Head of Strategic Planning and		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	C4		Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
June 2022	Annual Complaints Report	06/07/22 Mayor and Cabinet	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Adding a SEN Resource Base to Edmund Waller Primary School	06/07/22 Mayor and Cabinet	Matthew Henaughan, Head of Business, Infrastructure, Compliance and Education and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Adding a SEN Resource Base to Forster Park Primary School	06/07/22 Mayor and Cabinet	Matthew Henaughan, Head of Business, Infrastructure, Compliance and Education and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Expansion of Drumbeat School	06/07/22 Mayor and Cabinet	Matthew Henaughan, Head of Business, Infrastructure, Compliance and Education and Councillor Chris Barnham, Cabinet Member for Children's		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Services and School Performance		
May 2022	Change of Age Range at Fairlawn Primary School	06/07/22 Mayor and Cabinet	Matthew Henaughan, Head of Business, Infrastructure, Compliance and Education and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Permission to Procure New Hope Housing Project	06/07/22 Mayor and Cabinet	Polly Pascoe, Integrated Commissioning Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
May 2022	Permission to Procure Lewisham Wellbeing Service	06/07/22 Mayor and Cabinet	Polly Pascoe, Integrated Commissioning Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
May 2022	Permission to Procure Lewisham Dementia Hub	06/07/22 Mayor and Cabinet	Polly Pascoe, Integrated Commissioning Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Future of Housing Management: Options	06/07/22 Mayor and Cabinet	and Councillor Brenda Dacres, Deputy Mayor		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	Appraisal		and Cabinet Member for Housing Development and Planning		
June 2022	Learning Disability Framework Permission to procure contracts for Supported Living and related contract extensions	06/07/22 Mayor and Cabinet	Joanne Lee, Contracts Monitoring Officer and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Medium Term Financial Strategy	06/07/22 Mayor and Cabinet	Katharine Nidd, Strategic Procurement and Commercial Services Manager and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Approval for Contract Award former Catford Constitutional Club	06/07/22 Mayor and Cabinet	and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
June 2022	Authority to procure Specialist Short Breaks for overnight, Holiday & Weekend	06/07/22 Mayor and Cabinet	Councillor Suzannah Clarke, Chair Strategic Planning and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to procure Specialist Short Breaks/Personalised Care & Support	06/07/22 Mayor and Cabinet	and Councillor Chris Barnham, Cabinet Member for Children's		

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Services and School Performance		
May 2022	Meliot Centre Relocation Contract Award	19/07/22 Executive Director for Housing, Regeneration & Environment	and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Authority to Procure Mediation and Disagreement Resolution Service	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to procure SEN and Disabilities Advice and Support Services	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to procure Specialist Short Breaks - Mentoring Programme	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to Procure SEN Transport - Dynamic Purchasing System Licence	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to procure ASD Post Diagnosis Parent Support	19/07/22 Executive Director for Children and	and Councillor Chris Barnham, Cabinet Member for Children's		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
		Young People	Services and School Performance		
February 2022	BfL Programme - Approval to enter into contract	14/09/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
May 2022	Watergate Special School Expansion budget approval and approval to procure	14/09/22 Mayor and Cabinet	Iqbal Iffat, Project Manager Capital Programme Delivery and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Permission to Procure new registered provider for supported accommodation and building management (Northover and Amersham).	14/09/22 Mayor and Cabinet	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	On Street Advertising Contract Variation and Extension	14/09/22 Mayor and Cabinet	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
January 2022	Lewisham Autism Strategy	14/09/22 Mayor and Cabinet	Polly Pascoe, Integrated Commissioning Manager and Councillor Chris Best		
May 2022	Approval for s106 monies to go to Deptford Challenge Trust	14/09/22 Mayor and Cabinet	and Councillor Kim Powell, Cabinet Member for Businesses, Jobs and		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Skills		
June 2022	Reduction and Recycling Plan 2023-2025	14/09/22 Mayor and Cabinet	Wendy Nicholas, Strategic Waste and Environment Manager and Councillor Louise Krupski, Cabinet Member for Environment and Climate		
June 2022	Maximising Wellbeing of Carers	14/09/22 Mayor and Cabinet	Tristan Brice, Associate Director, Community Support and Care and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Public Realm Call Off Framework	14/09/22 Mayor and Cabinet	Louise McBride, Head of Highways & Transport and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
June 2022	Catford Regeneration Partnership Ltd Update	14/09/22 Mayor and Cabinet	Kplom Lotsu, SGM Capital Programmes and Councillor Kim Powell, Cabinet Member for Businesses, Jobs and Skills		
June 2022	Parker House Development Agreement	14/09/22 Mayor and Cabinet	Karen Barke, Head of Strategic Development and Councillor Brenda		

FORWARD PLAN – KEY DECISIONS					
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			Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
June 2022	Carer Information Advice and Support Services - permission to procure	14/09/22 Mayor and Cabinet	Joanne Lee, Contracts Monitoring Officer and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Lewisham and Lee Green LTN Monitoring Update	14/09/22 Mayor and Cabinet	Zahur Khan, Director of Public Realm and Councillor Louise Krupski, Cabinet Member for Environment and Climate		
June 2022	Catford Regeneration Partnership Ltd Update	28/09/22 Council	Kplom Lotsu, SGM Capital Programmes and Councillor Kim Powell, Cabinet Member for Businesses, Jobs and Skills		
May 2022	Lewisham Play Strategy 2022 - 2027	05/10/22 Mayor and Cabinet	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Approval to appoint operator for concessions contract at Beckenham Place Park lake	05/10/22 Mayor and Cabinet	and Councillor Andre Bourne, Cabinet Member for Culture and Leisure (job share)		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials

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Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials

Sustainable Development Select Committee work plan 2022-23

Item	Type	Priority	20-Jun-22	tbd/09/2022	30-Nov-22	tbd/01/2023	07-Mar-23
Flood risk management strategy	Performance monitoring						
Air quality action plan	Policy development						
Asset management	Policy development						
Controlled parking zone programme	Policy development						
Key planning issues	tbd						
Budget cuts	Standard item						
Local plan update	Policy development						
Climate emergency action plan	Performance monitoring						
Parks and open spaces: insourcing review	Policy development						
Implementation of the transport strategy: walking cycling and healthy neighbourhoods	Performance monitoring						

Information items

Annual parking report	Information						
Biodiversity action plan update	Information						
The regeneration of Catford Town Centre update	Information						
Major planning developments update (incl Bakerloo line)	Information						

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