

London Borough of Lewisham

Air Quality Action Plan 2022-2027

Consultation Responses Report

Contact details for this document

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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.

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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.

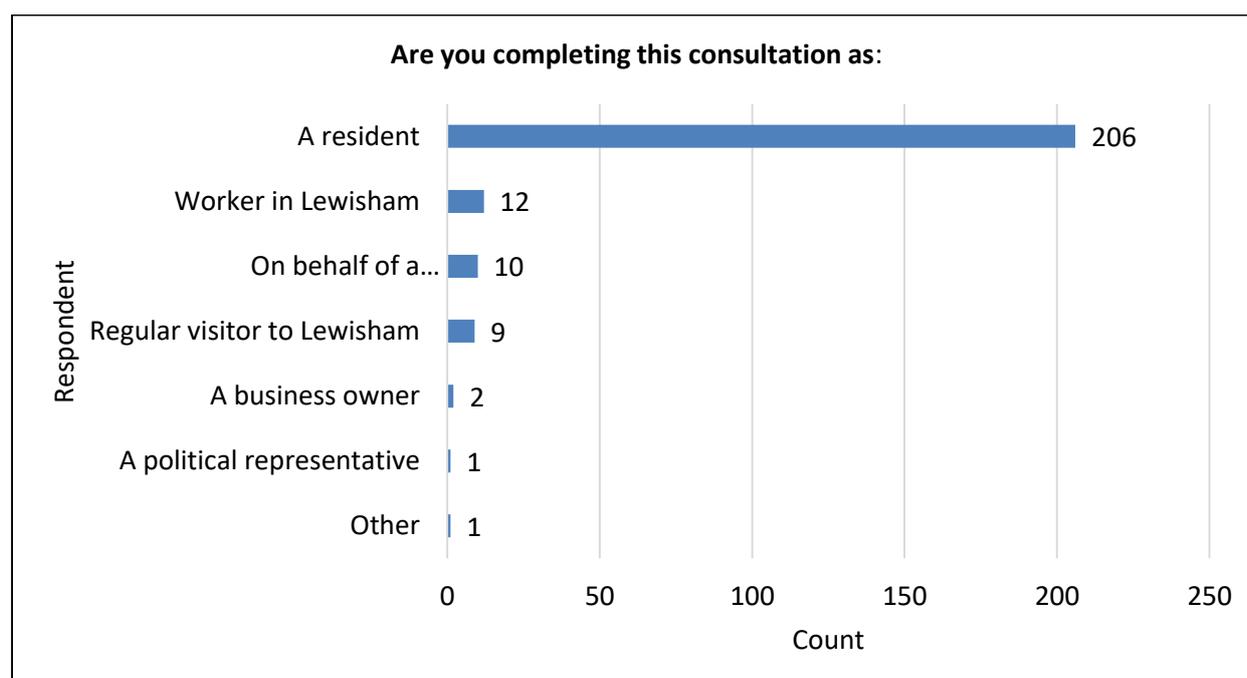
As assessment of the results revealed, issues raised are mostly related to transport planning, sustainable transport and highways interventions, as anticipated.

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%



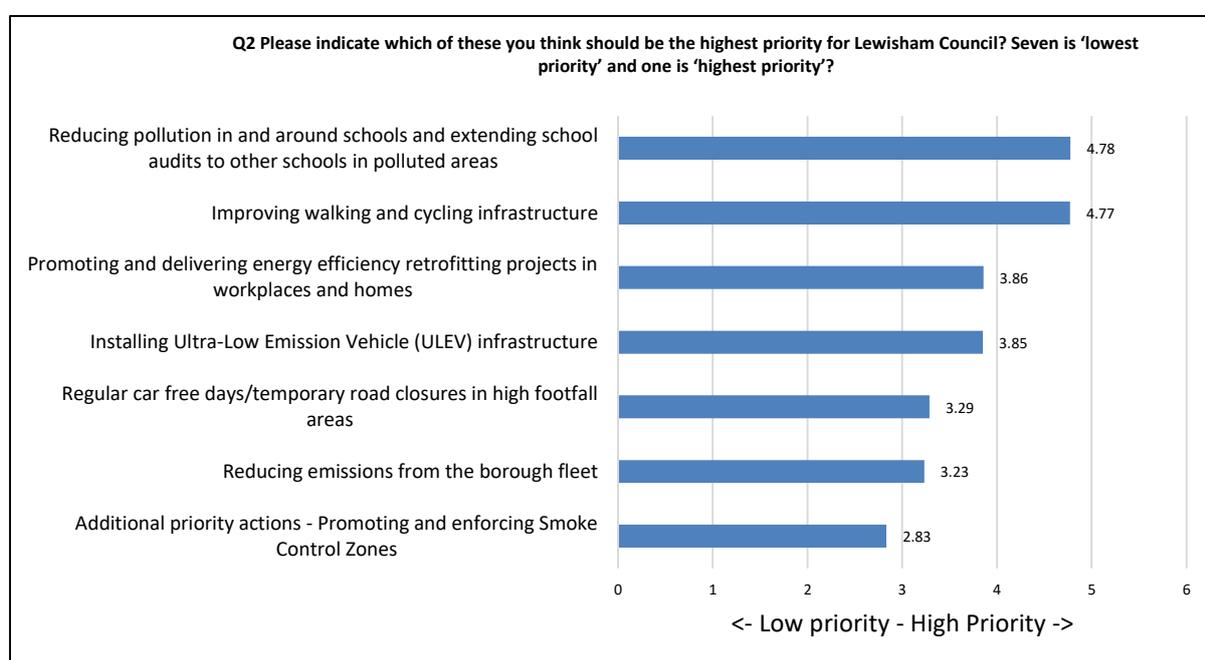
Note on Q1: As anticipated, most respondents were residents, who represent the highest group of the population sampled. According to the 2011 census, Lewisham has a population of 275,885. The low response rate from political representatives was anticipated because their opinions are voiced via their 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

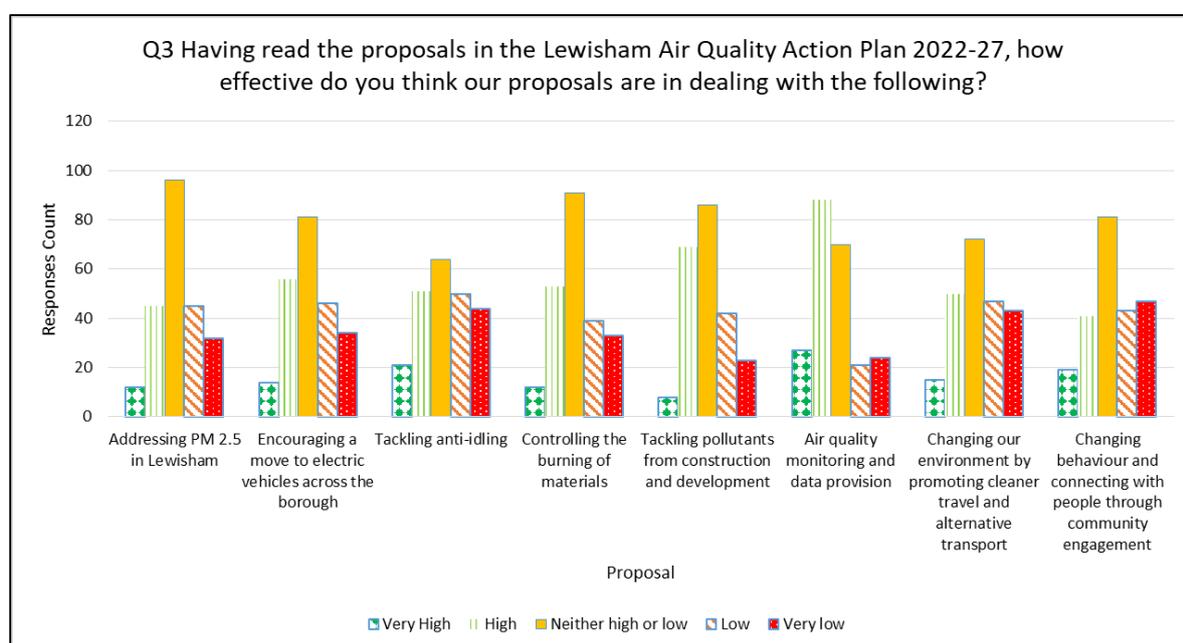


Note on Q2: Reducing pollution in and around schools, and extending school audits to other schools in polluted areas then improving walking and cycling infrastructure scored the highest as represented above.

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 are 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.

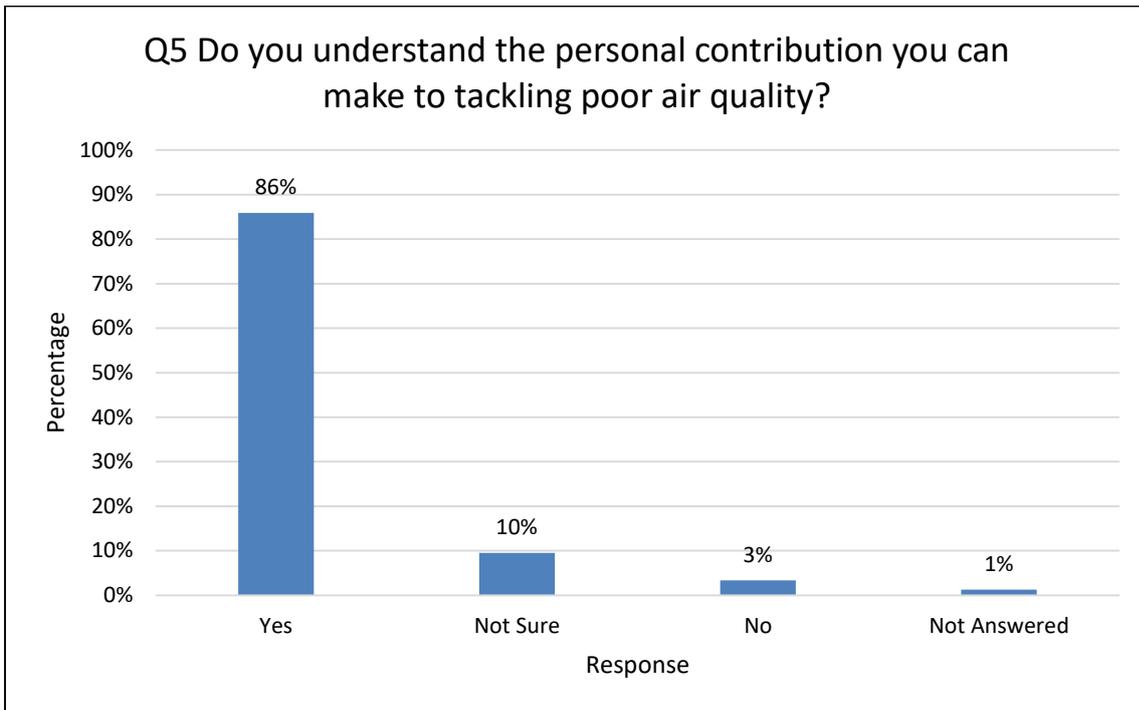
Table 4 Q4. Please tell us if you think there is anything we have missed or should consider in relation to the above Air Quality issues

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	encourage biodiversity, and bring many more benefits. <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	Some of the suggestions include: <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.

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.

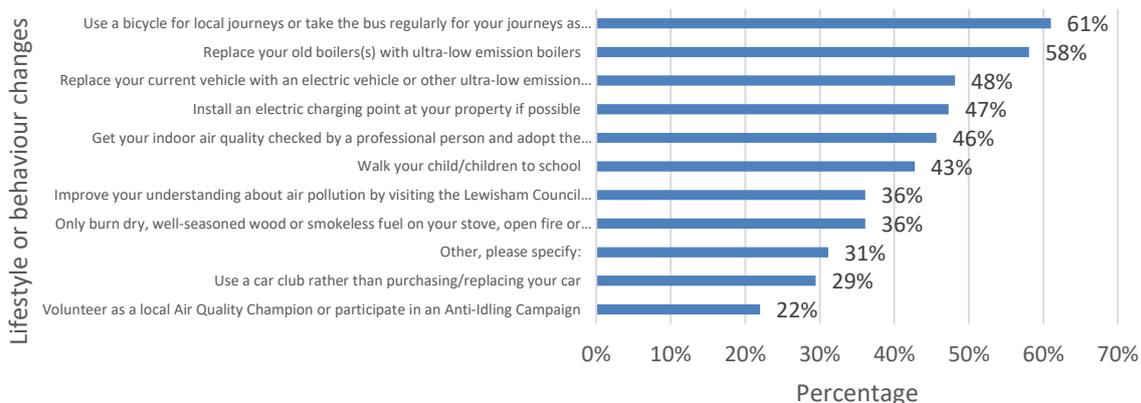
New Cross resident

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.

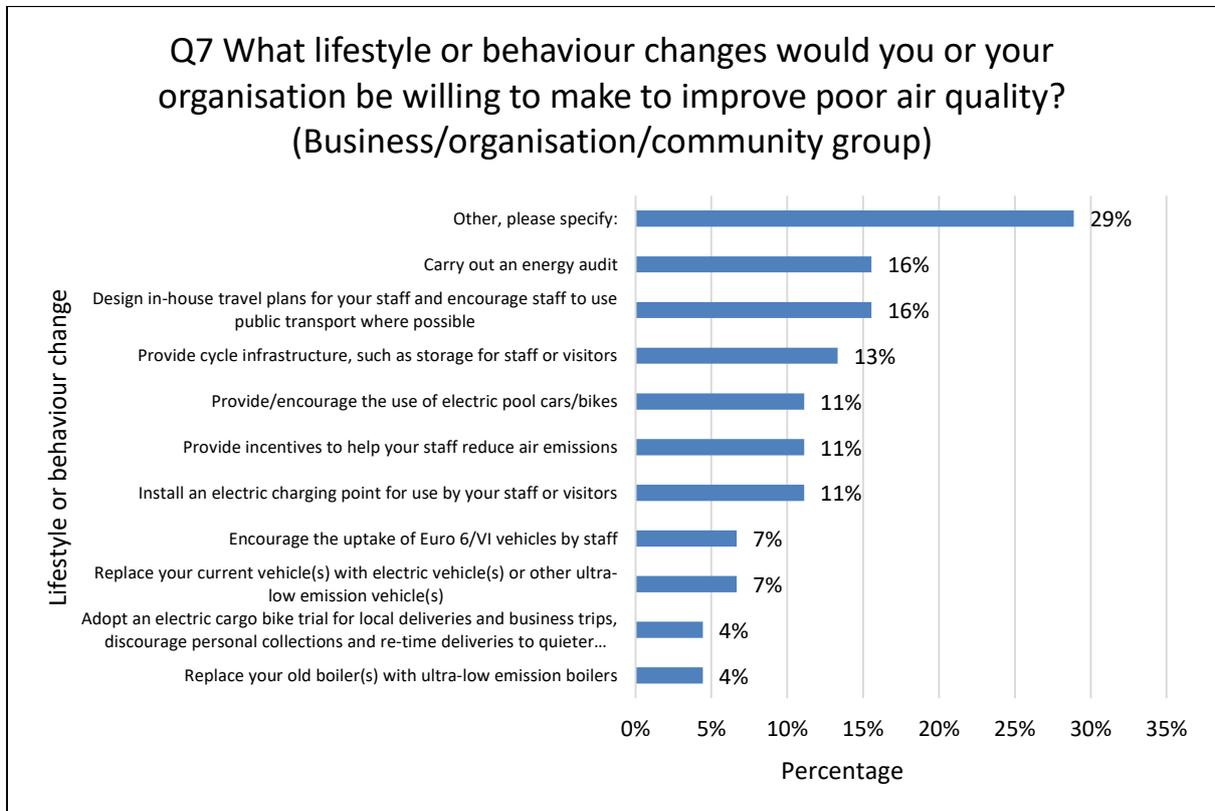
Action in the plan: Projects involving replacing old boilers and to promote active travel are being progressed as part of the transport strategy and the climate emergency plan. Lewisham's Climate Emergency Action Plan was approved by the Mayor and Cabinet in 2020 and includes a range of radical actions 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?

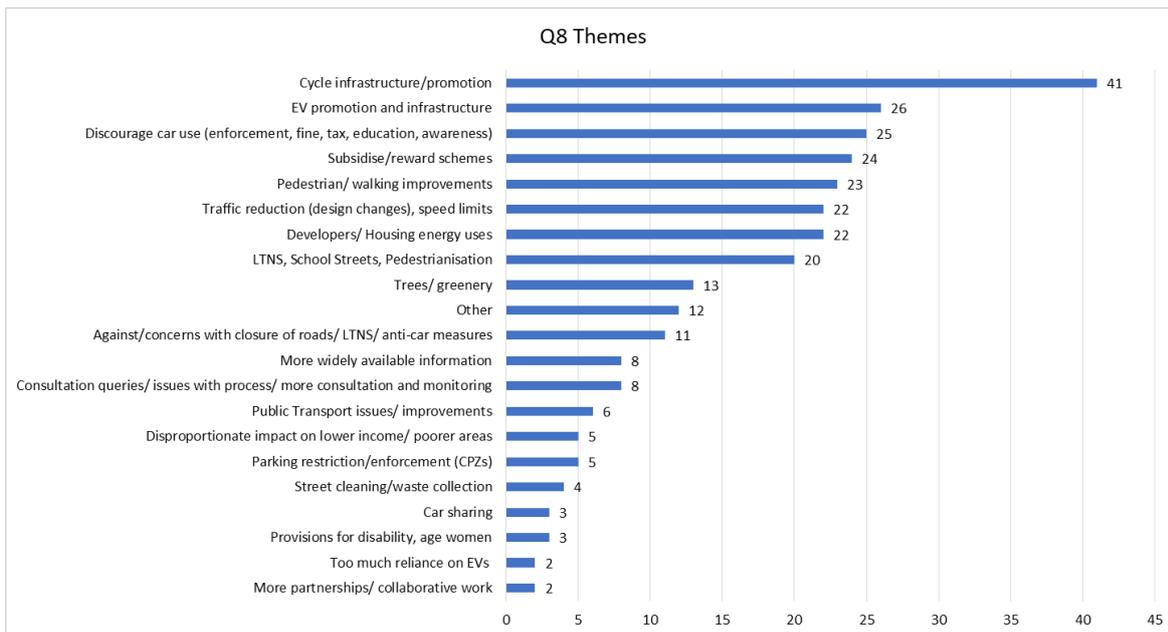
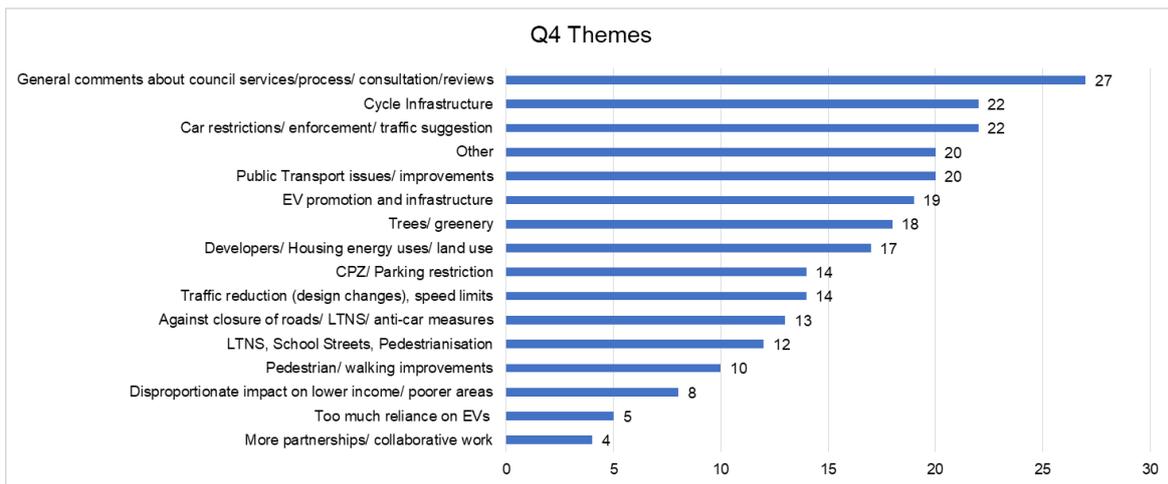
N	GLA recommended categories	Some Examples of Suggestions made.
1	Monitoring and other core statutory duties: maintaining monitoring networks is absolutely critical for understanding where pollution is most acute, and what measures are effective to reduce pollution and is one of a number of statutory 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.

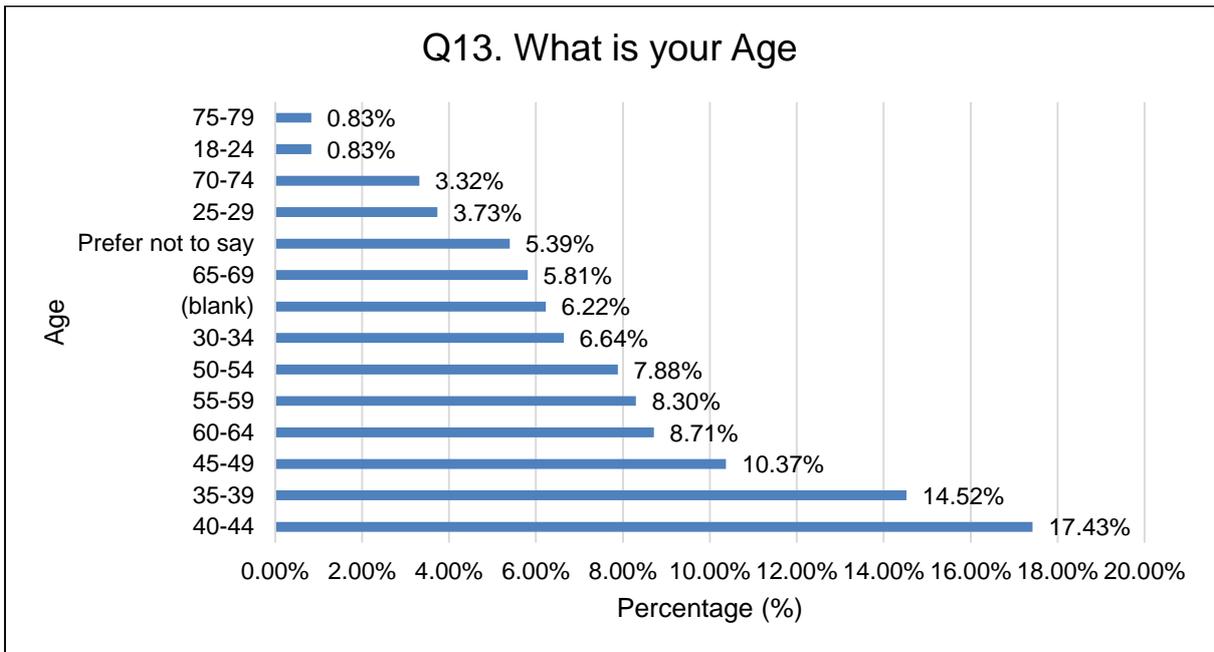
The personal data that you do provide is used to help us understand who is sharing their views and influencing our decision-making, though your identity will remain anonymous.

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?

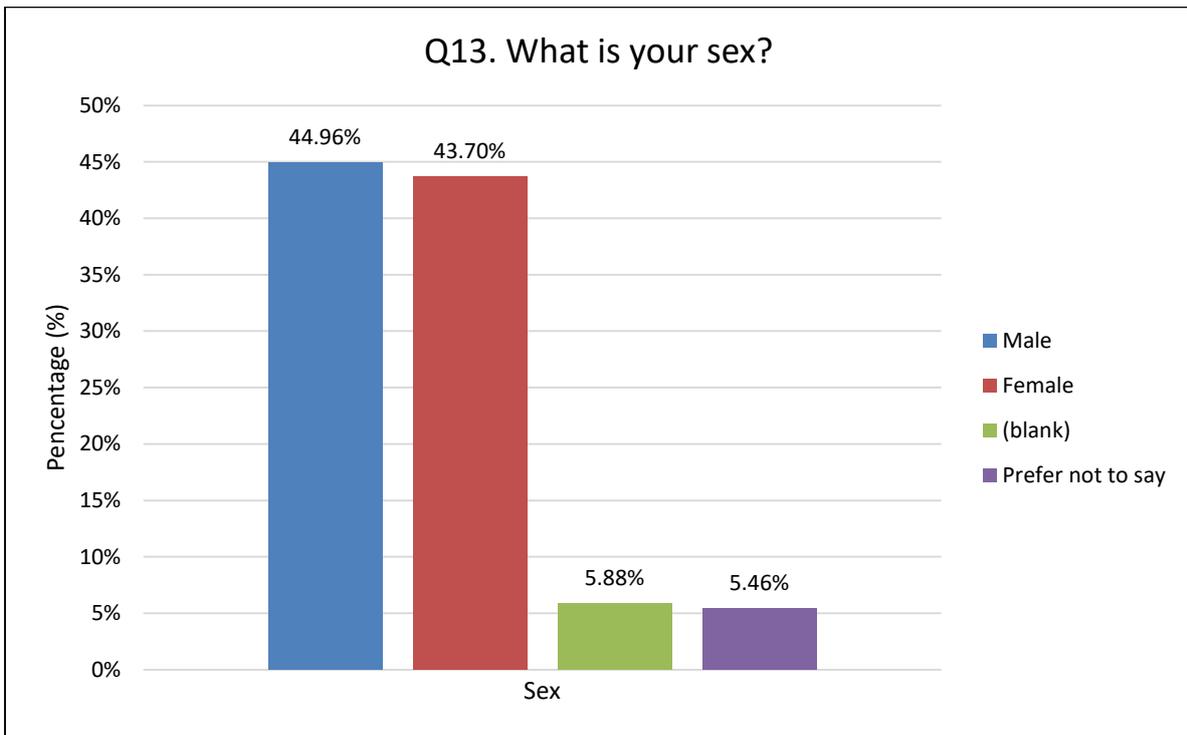
Age	Count of Response ID	Count of Response ID
40-44	42	17.43%
35-39	35	14.52%
45-49	25	10.37%
60-64	21	8.71%
55-59	20	8.30%
50-54	19	7.88%
30-34	16	6.64%
(blank)	15	6.22%
65-69	14	5.81%
Prefer not to say	13	5.39%
25-29	9	3.73%
70-74	8	3.32%
18-24	2	0.83%
75-79	2	0.83%
Grand Total	241	100.00%



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?

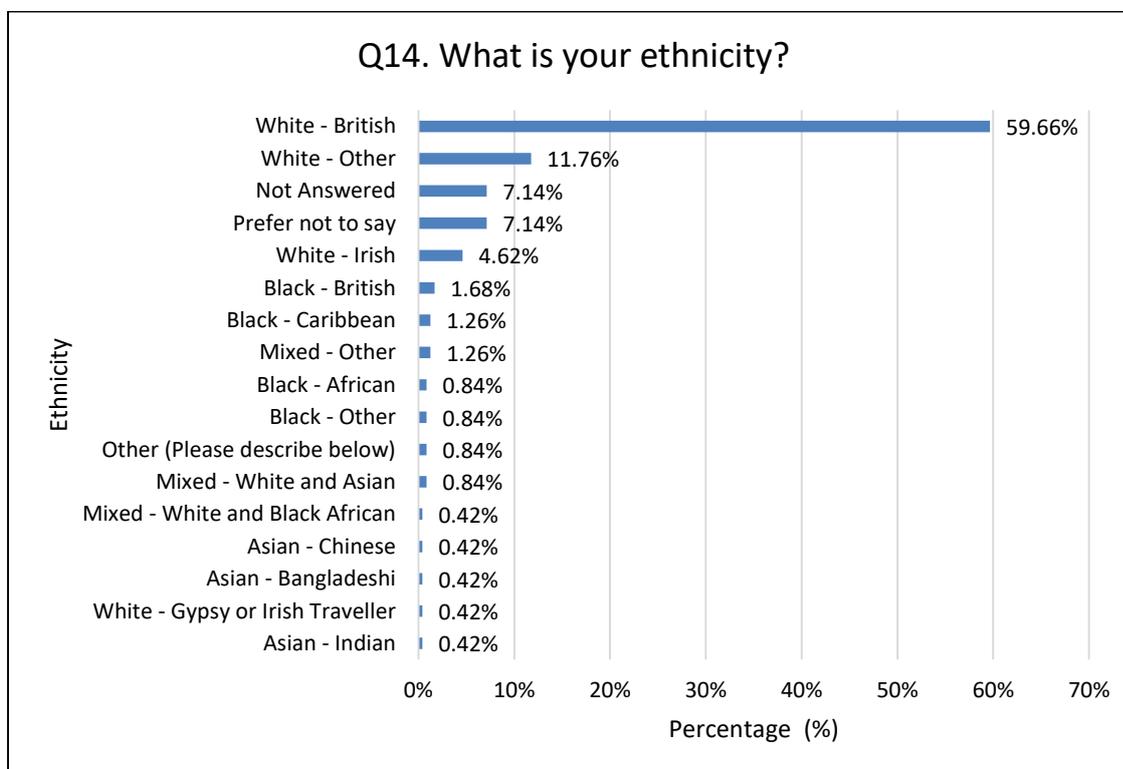
What is your sex?	Male	Female	(blank)	Prefer not to say	Grand Total
Percentage	44.96%	43.70%	5.88%	5.46%	100.00%
Count of Response ID	107	104	14	13	238



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%

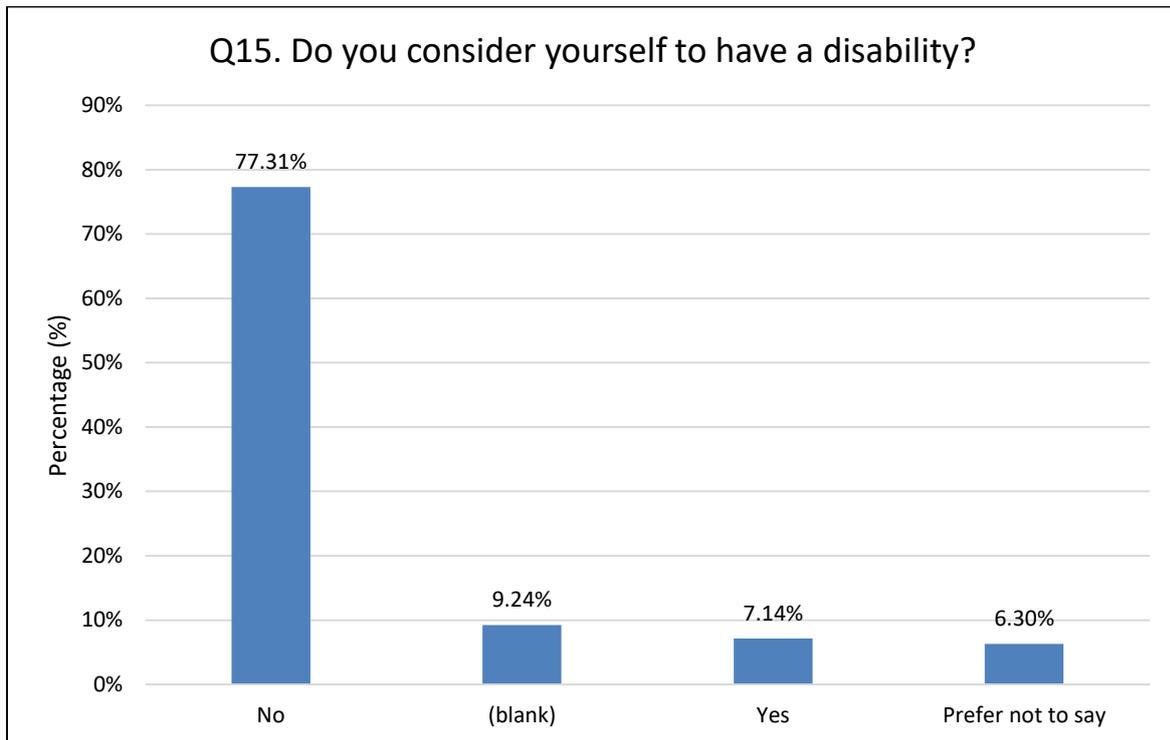


- Most respondents were white and the rest distributed among other groups. Lewisham is 53% white and 47% Black and Minority Ethnic (BME) therefore the highest respondent are likely to be from white people.

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%



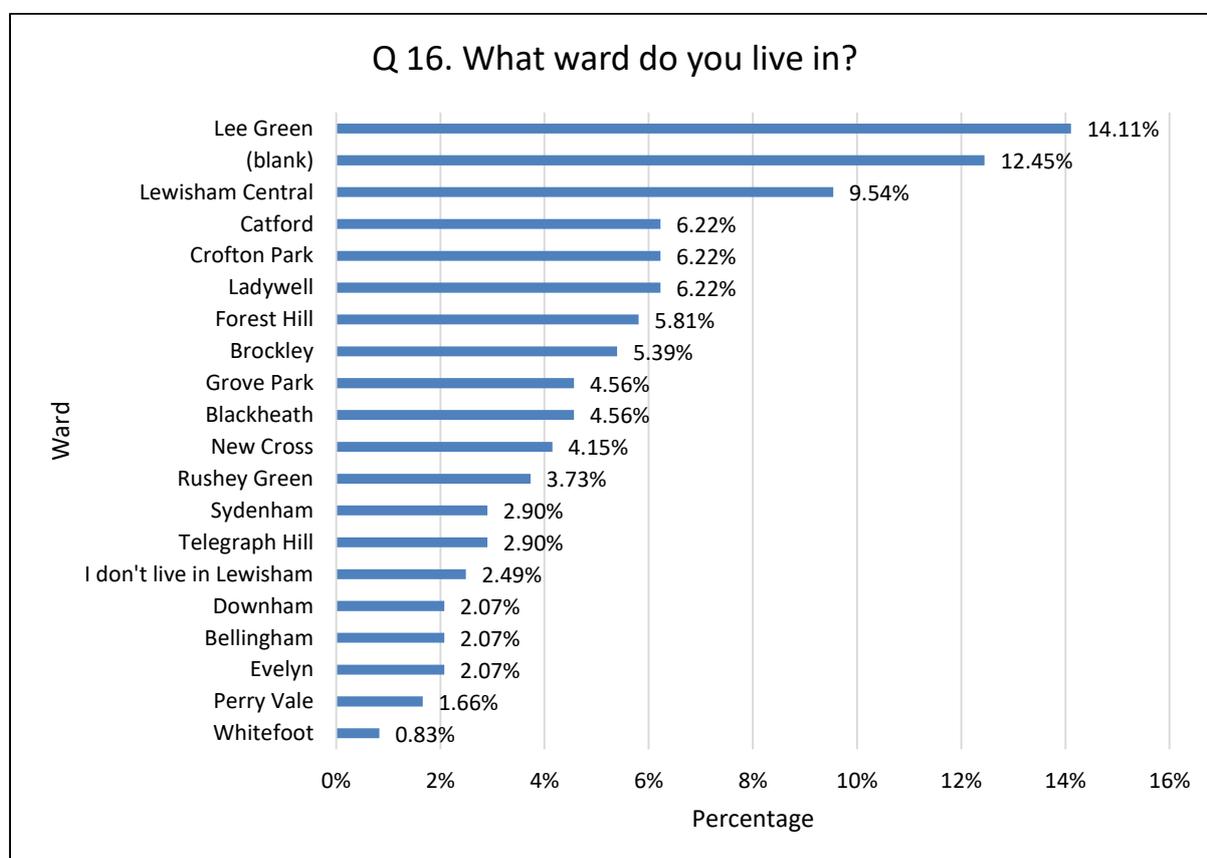
- Over 77% respondents were not disabled but 7.14% were disabled with disabilities distributed across all categories.

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??

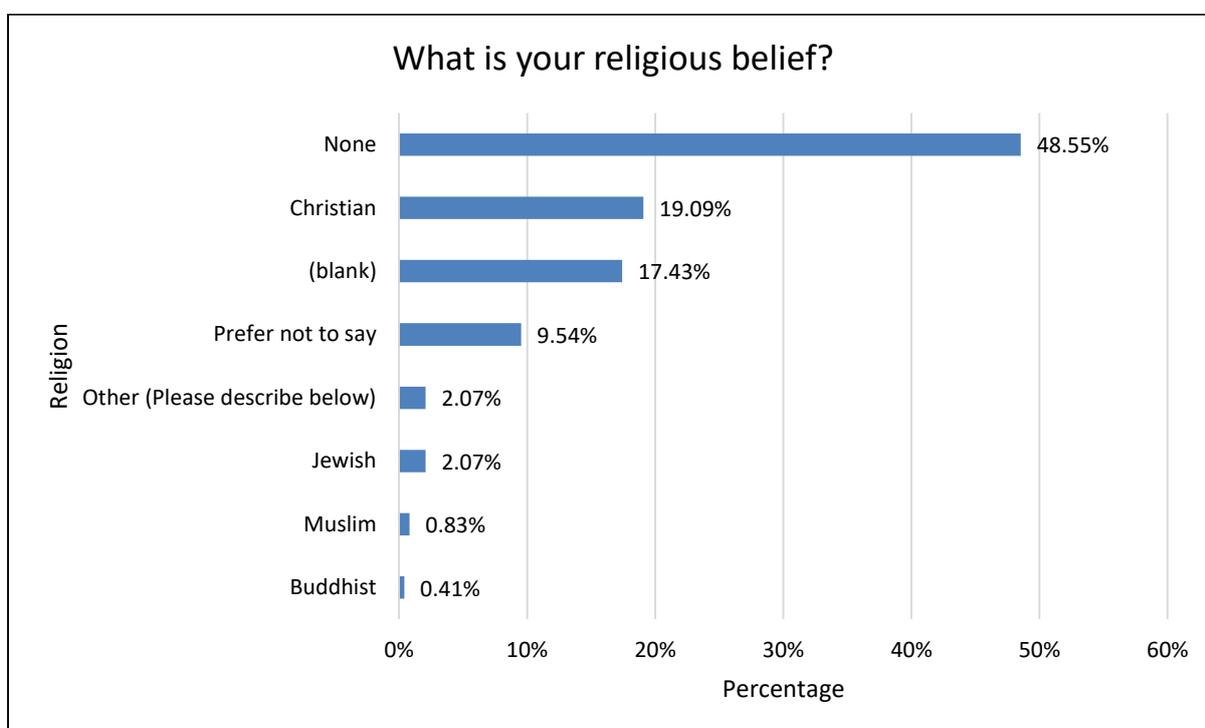
Ward	Count of Response ID	Percentage
Whitefoot	2	0.83%
Perry Vale	4	1.66%
Evelyn	5	2.07%
Bellingham	5	2.07%
Downham	5	2.07%
I don't live in Lewisham	6	2.49%
Telegraph Hill	7	2.90%
Sydenham	7	2.90%
Rushey Green	9	3.73%
New Cross	10	4.15%
Blackheath	11	4.56%
Grove Park	11	4.56%
Brockley	13	5.39%
Forest 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%

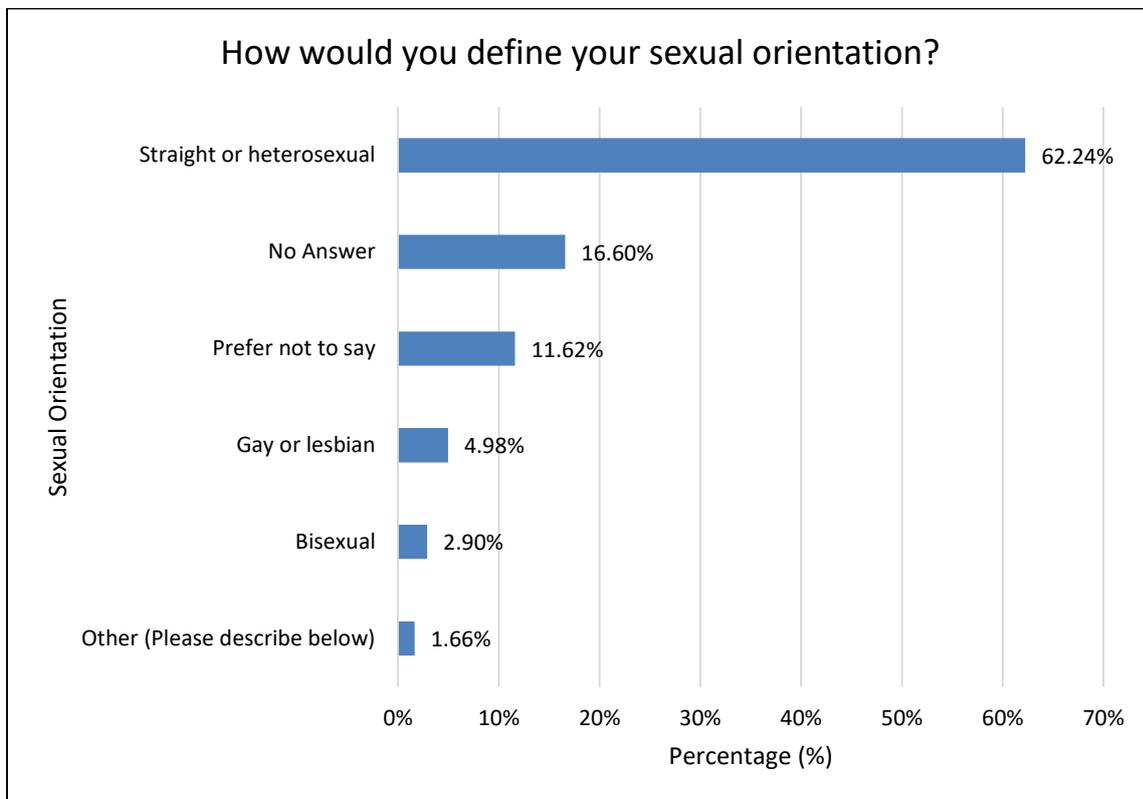


- The majority-i.e. 48.55% were not religion believers and 19.09% were Christians.

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%

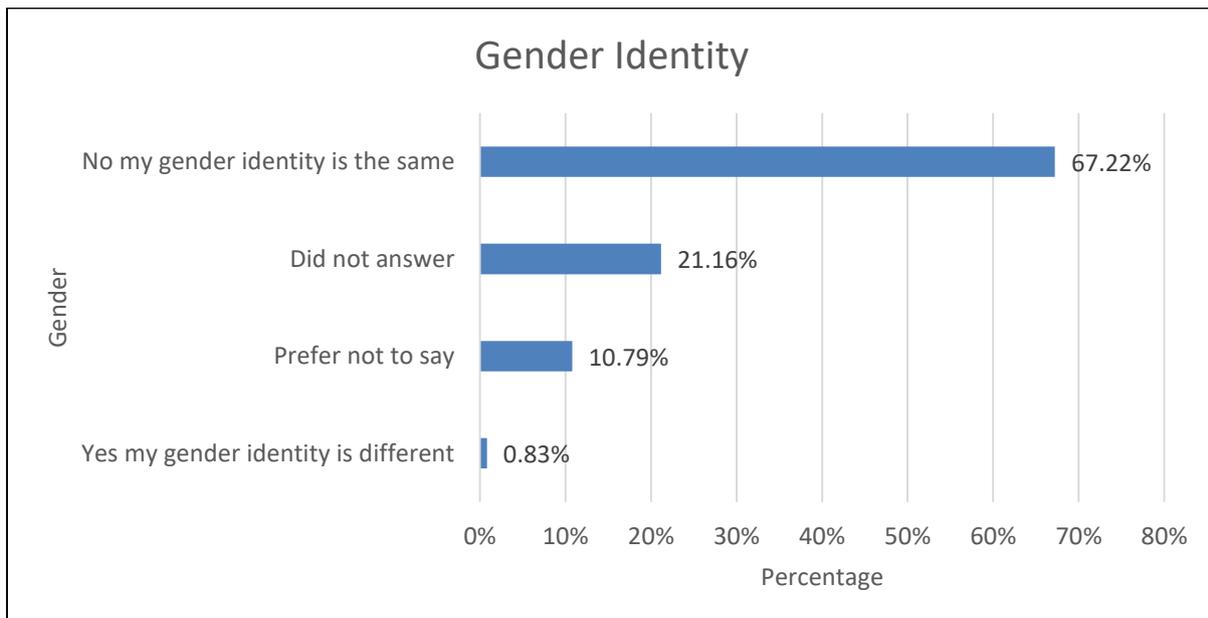
(blank)	40	16.60%
Straight or heterosexual	150	62.24%
Grand Total	241	100.00%



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 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-managment-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
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 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

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>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/aeqg/pollution-sensors.php>

²² <https://www.breathelondon.org/>

²³ <https://www.campbell-associates.co.uk/product/aeq-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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				<p>CMP, NRMM and AQDP conditions/air quality and dust enforcement actions.</p> <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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				<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	<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.	No comment made on this.	No changes to the draft AQAP.
Emissions from developments and buildings	8.2	<p>Introduce a requirement for a minimum EPC rating for privately rented sector HMOs covered by both the mandatory and additional licensing schemes.</p> <p>Introduce a requirement for any works covered</p>	Private Sector/Housing (Environmental Health Residential)	<p>We will keep a register of all private rented properties with minimum EPC rating.</p> <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</p>	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 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 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.	<p>All schools will be offered Bikeability ²⁶training for, children and young people who live in the borough. Balance bike and/or Scooter training is an annual offer to schools</p>	<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>people from air pollution" and other trial green technologies like CityTree benches/trees</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 Aduo-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	<p>Some comment include the following.</p> <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 	<p>No changes to the draft AQAP.</p> <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	<p>Ensuring that transport and Air Quality policies 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>	EP	<p>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.</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>	We will ensure that there is effective communication between those managing air quality issues within the borough and those managing traffic and travel.	<p>Communication between Lewisham and TfL and surrounding Boroughs is needed.</p> <p>Measuring Air Quality is good but appropriate measures are required to reduce air quality issues.</p>	<p>No changes to the draft AQAP.</p> <p>Communication with TfL and neighbouring Boroughs is a priority for Lewisham.</p> <p>There will be effective communication between those monitoring air quality and those managing traffic and travel.</p>
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	<p>Reduction of overall vehicle speed and driver fines in all Lewisham roads.</p> <p>General speed reduction and speed fine on all roads.</p>		<p>There should be a Borough wide 20mph speed limit.</p> <p>Enforcement of speed limits should increase.</p> <p>Reducing speed limits with reduce vehicle emissions.</p> <p>There should be more partnerships and collaboration.</p>	<p>No change to the AQAP. Comments noted and already considered in the draft plan.</p> <p>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.</p> <p>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>
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	<p>Greater communication is needed to discourage anti-idling.</p> <p>Idling should be enforced on all roads.</p> <p>Fines should be issues for idling vehicles.</p> <p>There needs to be repercussions for idling vehicles.</p> <p>LTNs have increased idling.</p>	<p>No changes to the draft AQAP. Comments noted and already considered in the draft plan.</p> <p>We will have Idling Action Events and workshops on air quality in schools. We are participating in the Pan London</p>

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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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		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.

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				<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>

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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>

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					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
Category	ID						
				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/ <p>TRANSPORT</p>	<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/myservices/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/myservices/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>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>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>Prioritise rolling out clean buses on the busiest roads e.g. A2 and A205, A21.</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>
INSULATION/BUILDING IMPROVEMENTS:		
	<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 $60,000 \times £15,000 = £900,000,000$.</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.
		<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>
	<p>Raise awareness with residents and businesses to report environmental incidents to our 24-hour incident hotline https://www.gov.uk/report-an-environmental-incident</p>	<p>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.</p>
	<p>Sharing information and evidence on air quality and agreeing joint actions to resolve air quality issues for businesses, landlords and all organisations involved.</p>	<p>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.</p>
	<p>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/</p>	<p>LBL will add the DEFRA information regarding residents and businesses signing up for air quality alerts and forecasts to the Lewisham website.</p>
<p>Catford Active Travel 27 September 2021</p>  <p>Catford Active Travel response to Lewisham</p>	<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>	<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>

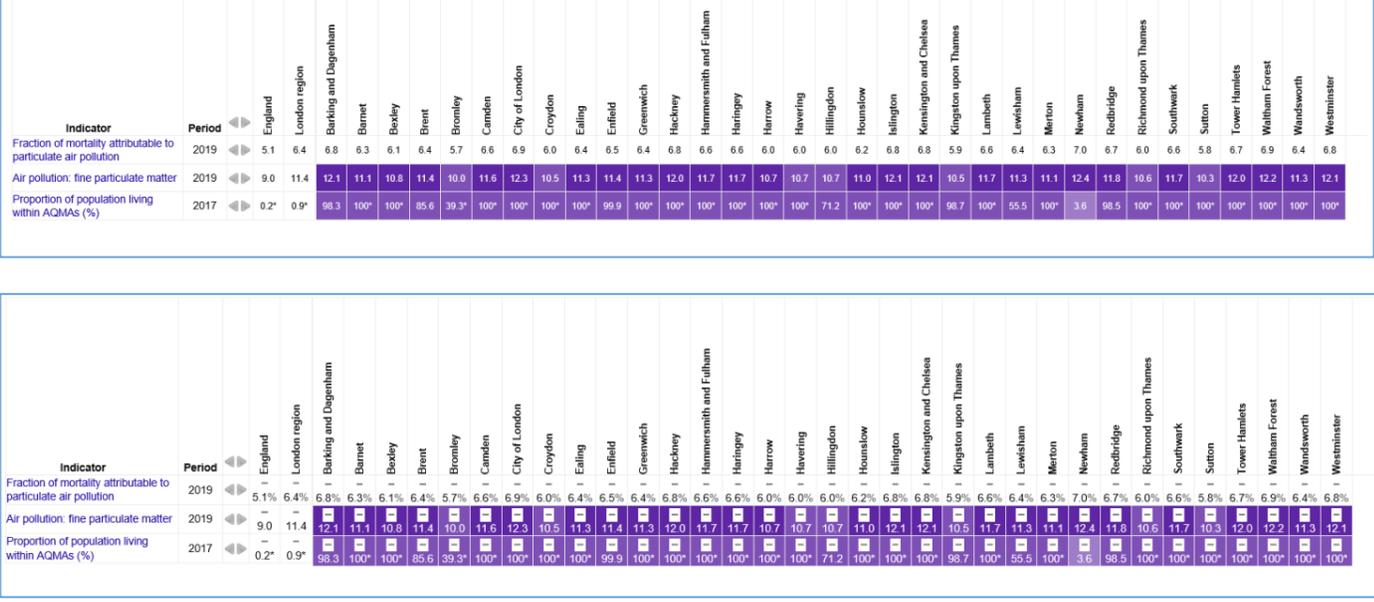
³⁶ <https://lewisham.gov.uk/mayorandcouncil/corporate-strategy/our-priorities>

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.
	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.	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.
	In Catford Specifically:	
	Borough fleet actions: replace larger vehicles with (cargo) e-bikes when possible to reduce the motor traffic in the area.	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.
	Localised solutions: analyse the car parking space in use in CPZ areas and where possible reallocate parking space to trees and parklets.	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
	Work with TfL to bring forward the A21 healthy street and Catford Bridge cantilevered cycling bridge.	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. 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.
	Roll out Low Traffic Neighbourhoods along the A21 corridor (Rushey Green / Hither Green West).	Comment noted. We are considering the future programme of healthy neighbourhoods and are updating the metrics as stated in the Transport Strategy.

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) 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, Haringey, 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.
	<p>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.</p>	<p>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.</p>
	<p>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.</p>	<p>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).</p>
	<p>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.</p>	<p>Electric cargo bikes provides an opportunity for Lewisham to expand the cycle parking in the Borough.</p>
	<p>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>	<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>
	<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>	<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> <p>ULEZ is just a means of funding TfL</p> <p>We have higher pollution that ever before on the south circular. Pavements are not wide enough, constrained by planters.</p> <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> <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> <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> <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](#)