



## Mayor and Cabinet

**Report title: Lewisham Air Quality Action Plan (AQAP) 2022-27**

**Date:** 6 July 2022

**Key decision:** Yes

**Class:** Part 1

**Ward(s) affected:** All

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## Outline and recommendations

- The London Borough of Lewisham (LBL) is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP sets out the commitment and actions that will be taken by LBL to improve air quality between 2022 and 2027. Schedule 11 of the Environment Act 1995 requires local authorities to consult on their AQAP with a range of persons and organisations. The final reviewed AQAP following consultation is appended to this report.
- Public consultation for the AQAP was undertaken between 1 September 2021 and 6 October 2021, which presented actions developed within seven broad themes proposed to reduce air pollution in Lewisham. The seven themes are as follows:
  1. **Monitoring and other core statutory duties:** Maintenance of monitoring networks is critical to understand where pollution is most acute in Lewisham and to assess which measures are most effective to reduce pollution. This is one of a number of statutory duties.
  2. **Emissions from developments and buildings:** Emissions from buildings account for about 15% of the NO<sub>x</sub> emissions across London and are important in affecting NO<sub>2</sub> concentrations.
  3. **Public health and awareness raising:** Increasing awareness can drive behavioural change to lower emissions as well as reducing exposure to air pollution.
  4. **Delivery servicing and freight:** Vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO<sub>2</sub> emissions.
  5. **Borough fleet actions:** Our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO<sub>2</sub> emissions. Addressing our own fleet means we will be leading by example.
  6. **Localised solutions:** These seek to improve the environment of neighbourhoods through a combination of measures.
  7. **Cleaner transport:** Road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric cars) as far as possible.

It is recommended that Mayor and Cabinet:

- Note the AQAP consultation report.
- Note the new World Health Organization (WHO) air quality guidelines for PM<sub>2.5</sub>.
- Approve the final AQAP 2022-27.

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## Timeline of engagement and decision-making

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

## 1. Summary

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

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

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

## 2. Recommendations

- 2.1. Mayor and Cabinet is being asked to:
  - Note the AQAP consultation report.
  - Note the new World Health Organization (WHO) air quality guideline for PM<sub>2.5</sub>.
  - Approve the final AQAP 2022-27.

## 3. Policy Context

- 3.1. **Air Quality Management Areas**
- 3.2. Similarly to other London boroughs, LBL was declared an Air Quality Management Area (AQMA) in 2001, due to air quality levels for two key pollutants, nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM), exceeding statutory limits.
- 3.3. NO<sub>2</sub> is created when fuel is burnt and the main sources include combustion engines, heating plants and construction plant/vehicles.
- 3.4. PM is a generic term used to describe a complex mixture of solid and liquid particles of varying size, shape, and composition. Some particles are emitted directly (primary PM); others are formed in the atmosphere through complex chemical reactions (secondary PM).
- 3.5. The composition of PM varies greatly and depends on many factors, such as geographical location, emission sources and weather. Particulates are classified according to size. The UK is currently focused on measuring the fractions of PM where particles are less than 10 micrometres in diameter (PM<sub>10</sub>) and less than 2.5 micrometres in diameter (PM<sub>2.5</sub>) based on the latest evidence on the effects of PM to health.

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- 3.6. PM<sub>10</sub> is made up from a variety of substances i.e. soot, dust and secondary particles formed by the reaction of other pollutants in the air. The main sources of particulate matter are combustion engines, biomass heating plants (wood fuelled), brake and tyre wear, construction activity/plant and Heavy Goods Vehicles (HGVs).
- 3.7. PM<sub>2.5</sub> in London comes from regional, and often trans-boundary (non-UK) sources. Therefore, the powers to tackle these emissions involves London, the UK and other European governments which can make it difficult to address these emissions with direct measures.
- 3.8. Due to the small size of many of the particles that form PM some of these toxins may enter the bloodstream and be transported around the body, lodging in the heart, brain and other organs. Exposure to PM can result in serious impacts to health, especially in vulnerable groups such as the young, elderly and those with respiratory problems. PM<sub>2.5</sub> are harmful to human health in all concentrations.
- 3.9. Under Part 4 of the Environment Act 1995 LBL is required to provide an AQAP to address the areas of poor air quality identified within the AQMA.
- 3.10. **London Environment Strategy 2018**
- 3.11. In the London Environment Strategy 2018, the Mayor of London committed to meeting World Health Organisation recommended limits for PM<sub>2.5</sub> of 10µgm<sup>-3</sup> by 2030. Boroughs have a key role to play in helping to meet this target, and the LLAQM will continue to play a vital role in shaping borough action on addressing this pollutant. Boroughs are requested to include a focus on PM<sub>2.5</sub> in their AQAPs and to maintain AQMAs for PM<sub>10</sub>, even if they are technically meeting the legal limit. Currently, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects. Therefore, further reduction of PM and/or NO<sub>2</sub> concentrations below air quality standards is likely to bring additional health benefits.
- 3.12. **Government legislation for Particulate Matter (PM)**
- 3.13. In July 2019, the Government announced it would legislate to make World Health Organisations (WHO) PM<sub>2.5</sub> limits legally binding. At the time of writing, it is unclear how and when this will come into force. Boroughs will of course need to follow any new national legislation. If the Government does not set a compliance date that is sooner than 2030, boroughs are asked to retain the ambition to meet this limit by 2030. The matter will be kept under review by the Mayor of London.
- 3.14. **World Health Organisation (WHO) recommended guidelines for air pollution**
- 3.15. In 2021, the WHO updated its recommended guidelines for air pollutants. For PM<sub>2.5</sub>, it tightened the recommended annual average guideline to 5µgm<sup>-3</sup>, while retaining 10µgm<sup>-3</sup> as an interim guideline which the Mayor of London has committed to meet by 2030 (the legal annual average limit is 25µgm<sup>-3</sup>). For nitrogen dioxide (NO<sub>2</sub>) the WHO tightened the recommended annual average guideline to 10µgm<sup>-3</sup> (the previous WHO guideline was 40µgm<sup>-3</sup> which is also the legal annual average limit). These changes underscore that, despite the significant progress made, accelerated additional action is needed to protect human health. Delivering this action will require the Government to work with the Mayor of London and provide further powers and resources. The Mayor of London continues to make the case for these.
- 3.16. The Government is currently in the process of preparing secondary legislation following passage of the Environment Act in 2021 to amend existing legally binding air quality limits. The Mayor of London has made the case for these to be aligned with the new

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

- 3.17. The Greater London Authority (GLA) has introduced a “PM<sub>2.5</sub> borough role” for borough air quality teams so that alongside measures to tackle other pollutants, they also consider action that is necessary to address PM<sub>2.5</sub> issues in their areas, aligning their interests with those of borough public health officers.
- 3.18. Boroughs are expected to work towards reducing emissions and concentrations of PM<sub>2.5</sub> in their areas. In doing so they are not required to carry out any additional local review and assessment (including monitoring) but can instead make use of the PM<sub>2.5</sub> modelling and source apportionment provided in the LLAQM borough-specific London Atmospheric Emissions Inventory (LAEI) packages to be supplied by the GLA by the end of 2022.
- 3.19. Where PM<sub>10</sub> monitoring is available, London boroughs may also follow guidance on how to estimate PM<sub>2.5</sub> from PM<sub>10</sub> monitoring data, as provided in Chapter 4 and Appendix B of LLAQM technical guidance. Boroughs are asked to set out in their AQAP how they will fulfil their role to work towards reducing PM<sub>2.5</sub> and any actions they are taking or will take.

### 3.20. **Particulate Matter (PM)<sub>2.5</sub> in Lewisham**

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

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levels will be considered.

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

### 3.24. **Public Health Outcomes Framework**

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

### 3.26. **Contribution to local strategic outcomes**

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

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

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sections.

## 4. Background

- 4.1. The LBL AQAP was developed in line with the LBL Corporate Strategy 2018-2022. It is a legal requirement for Local Authorities to work towards the air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that Act. The Council is expected to meet the requirements of the London Local Air Quality Management statutory process<sup>1</sup>.
- 4.2. The proposed AQAP outlines how LBL will effectively use local levers to tackle air quality issues within its control and lead by example. It is recognised that there are many air quality policy areas that are outside of the Council's influence (such as National standards, national vehicle taxation policy, taxis and buses). We will continue to work with and lobby regional and central government on such policies and issues.
- 4.3. The draft AQAP was written in collaboration with and approved by all the relevant internal stakeholders including the Directors Transport, Planning, Public Health, and Public Realm.

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

- 5.1. LBL was declared an Air Quality Management Area (AQMA) in 2001, due to air quality levels for NO<sub>2</sub> and PM exceeding statutory limits (Section 1.1 of the AQAP shows the geographic locations).
- 5.2. Under Part 4 of the Environment Act 1995, LBL is required to provide an AQAP to address the areas of poor air quality identified within its AQMAs.
- 5.3. There is strong evidence that NO<sub>2</sub> and PM are harmful to health in several ways including (1) **short term exposure** is associated with worsening symptoms of pre-existing lung disease and asthma, as well as increased risk of cardiovascular events such as myocardial infarction and stroke; (2) **long term exposure** is associated with an increased risk of developing cardiovascular disease and cancer, reduced lung function for both children and adults and low birth weight; and (3) **vulnerable groups** i.e. the very young and old are at high risk of health impacts, as well as those with pre-existing conditions i.e. diabetes, respiratory disease and obesity. Poor diet, deprivation and proximity to pollution sources also have an impact on health inequalities.
- 5.4. The AQAP 2022-27 outlines action to improve air quality in the AQMAs and will replace the previous AQAP which ran from 2016 to 2021.

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

- 6.1. When preparing the AQAP, LBL had a statutory duty to consult with a range of bodies. The consultation period is not defined in the statute, but as a key policy, a minimum consultation period of 6-8 weeks is normally used by the Council. Other councils have consulted on their Air Quality Action Plans for between 4 and 12 weeks. A period of 6

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

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weeks was selected as a reasonable time to carry out a detailed consultation.

- 6.2. LBL had discretion as to what form the consultation would take. As outlined in the introduction of the AQAP, the COVID-19 pandemic and government restrictions meant that it was not possible to hold public meetings at the time of compiling the AQAP. As a result, only virtual meetings and virtual media campaigns were used. An online questionnaire was also used during the consultation, which was made available in accessible formats.
- 6.3. The AQAP consultation also followed the consultation for the Low Traffic Neighbourhoods (LTN) and so responses to that consultation regarding air quality were also taken into account.
- 6.4. The Mayor of London is a key statutory consultee and approves the final AQAP prior to publication. In addition, the Council must consult:
  - the Secretary of State;
  - the Environment Agency;
  - Transport for London (who will provide a joint response with the Mayor of London);
  - all neighbouring boroughs and/or neighbouring district and county councils;
  - other public authorities as the borough considers appropriate;
  - bodies representing local business interests and
  - other persons/organisations as considered appropriate.
- 6.5. The AQAP consultation report is included as an Appendix to this report (see **Appendix 2**). The consultation findings informed revision of the draft AQAP to complete a final version, which can be found in **Appendix 1** of this report.

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

- 7.1. The final AQAP 2022-27 contains actions under seven key themes are as follows:
- 7.2. **Monitoring and other core statutory duties:** Maintenance of monitoring networks is critical to understand where pollution is most acute in Lewisham and to assess which measures are most effective to reduce pollution. This is one of a number of statutory duties.
- 7.3. **Emissions from developments and buildings:** Emissions from buildings account for about 15% of the NOX emissions across London and are important in affecting NO2 concentrations.
- 7.4. **Public health and awareness raising:** Increasing awareness can drive behavioural change to lower emissions as well as reducing exposure to air pollution.
- 7.5. **Delivery servicing and freight:** Vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO2 emissions.
- 7.6. **Borough fleet actions:** Our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO2 emissions. Addressing our own fleet means we will be leading by example.
- 7.7. **Localised solutions:** These seek to improve the environment of neighbourhoods through a combination of measures.
- 7.8. **Cleaner transport:** Road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such

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as electric cars) as far as possible.

- 7.9. The action plan considers measures and actions in terms of costs, effectiveness, time-scales and feasibility of implementation. We cannot guarantee that we will be able to do everything that is presented in this plan immediately. However, we will work hard to achieve the aim and objectives of this plan.
- 7.10. Work is underway with the Lewisham Council communications team to produce a public facing summary document for the AQAP to support engagement of residents and other stakeholders. This will be particularly important for engagement with groups of residents that were not as well represented in the public consultation.

## 8. Financial implications

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

## 9. Procurement

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

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## 10. Legal implications

- 10.1. Air quality standards and objectives are set out in the Air Quality (England) Regulations 2000. The Council has a duty to review the quality of air within their area under Part IV of the Environment Act 1995.
- 10.2. Where the relevant standards and objectives are not being met, the Council has a duty to designate an air quality management area and prepare an action plan.
- 10.3. The action plan must include the time(s) within which the Council proposes to implement its measures and include proposals submitted by the Mayor of London for the exercise of the Mayor's powers.
- 10.4. Where preparing an action plan, the Council must consult the Mayor of London, the Secretary of State, the Environment Agency, the Highway Authorities for the area, neighbouring local authorities, appropriate public authorities exercising functions in the vicinity, bodies representing local business interests, and other bodies or organisations as considered appropriate.
- 10.5. The Council must have regard to the guidance issued by the Mayor of London. The Mayor of London also has broad powers to direct the Council to take action in respect of air quality, and the Council must comply with any such direction.
- 10.6. The Mayor of London expects action plans to be updated at least every 5 years.

## 11. Equalities implications

- 11.1. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to: (1) eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act; (2) advance equality of opportunity between people who share those protected characteristics and people who do not; and (3) foster good relations between people who share those characteristics and people who do not.
- 11.2. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/belief, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 11.3. Air pollution is associated with a number of adverse health impacts and it is recognised as a contributing factor in the onset of heart disease and cancer. There is a strong association between air pollution and equalities issues. It particularly affects the most vulnerable in society, including children and older people, and those with long-term health conditions. Moreover, areas with poor air quality are also often the less affluent areas, in which Black Asian and Minority Ethnic communities constitute a relatively high proportion of the resident population.
- 11.4. The AQAP will improve outcomes for individuals and groups who share protected characteristics including age, race and ethnicity, and disability. By taking action to mitigate the effects of air pollution, the Council is working to address a known inequality in terms of environmental quality. Specific considerations for those with disabilities and included in actions 8.2, 9.1, 14, and 21.2 in Table 4.1 of the AQAP.
- 11.5. An Equality Impact Assessment (**Appendix 3**) has been undertaken to support the revised AQAP. The Assessment provides further details on how the strategy will support work to tackle inequalities, such as those relating to health in Lewisham. There is no perceived negative impact on end users and the Assessment found that the adoption of the AQAP is likely to have a positive impact on the health of all groups of the population in Lewisham and beyond.

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## **12. Climate change and environmental implications**

- 12.1. Improving air quality is part of an integrated approach to addressing the climate emergency. Local government has been at the forefront of a call for sustained and significant action on climate change. The ambitious climate emergency targets and plans set by LBL, alongside organisations and bodies across the country, are among the first steps in the response to the climate and ecological crisis that has resulted from global inaction and ignoring the emerging crisis.
- 12.2. The climate emergency is a key challenge for Lewisham and the United Kingdom in general. The impetus for change is that the demand for action on the climate crisis has come from citizens, and particularly young people, locally, nationally and internationally. This call for action is grounded in a greater understanding of the connections between the local environment, the quality of our open spaces and the air we breathe, and sustainability at a global level.
- 12.3. Lewisham's Climate Emergency Action Plan was approved by the Mayor and Cabinet in 2020 and includes a range of radical actions across the Council's corporate estate, housing, transport and green spaces intended to support delivery of the ambition for Lewisham to be carbon neutral by 2030.
- 12.4. Carbon dioxide is not, in itself, considered a primary pollutant in terms of air quality, but the main sources of carbon at a local level, particularly in urban environments, are energy use in the home and transport. These are also key determinants of local air quality.
- 12.5. LBL has statutory duties under the London Local Air Quality Management (LLAQM) scheme to monitor a variety of pollutants across the borough including around building sites.
- 12.6. Emissions from buildings and NRMM also account for about 15% of the NOX emissions across London so are important in affecting NO2 concentrations. Borough wide actions to reduce emissions from buildings will often result in reduced air pollution and carbon emissions, and activities to increase green infrastructure and green space in urban areas help reduce air pollution as well as reducing the urban heat island effect and absorbing carbon dioxide.
- 12.7. It must be emphasised that some of the air quality focus areas located in the north of the borough coincide very well with the focus areas identified in our Strategy Heat Network map. Therefore combined actions will be considered as part of Climate emergency plan and this air quality action plan in these areas.

## **13. Crime and disorder implications**

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

## **14. Health and wellbeing implications**

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

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- 14.3. The Lewisham HPC reports include section on trends of air quality across the borough therefore the outcomes are directly linked to air quality data.

## 15. Background papers

- 15.1. London Local Air Quality Management (LLAQM) Policy Guidance 2019  
<https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>
- 15.2. All our reports and air quality monitoring data are available at the following links  
<https://lewisham.gov.uk/myservices/environment/air-pollution/read-our-air-quality-action-plan-and-other-reports>
- 15.3. Pollution concentrations across Lewisham can be accessed at  
<https://lewisham.gov.uk/myservices/environment/air-pollution/check-air-quality-levels>

## 16. Glossary

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

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LBL	London Borough of Lewisham
LLAQM	London Local Air Quality Management
LTN	Low Traffic Neighbourhood
NRMM	Non-Road Mobile Machinery
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
TfL	Transport for London
ULEZ	Ultra Low Emissions Zone
WHO	World Health Organisation

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## 18. Appendices

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

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