



Sustainable Development Select Committee

Report title: LBL Air Quality Action Plan (AQAP) 2022-2027 – An Update on Progress

Date: 12 September 2023

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: David Edwards, Head of Environmental Health; Dr Catherine Mbema, Director of Public Health; Dr Lucy Kirk, Environmental Protection Manager; Sefkan Alltuntop, Air Quality Project Officer; Aslam Baig, Public Health Strategist, Health Protection

Outline and recommendations

The London Borough of Lewisham (LBL) adopted the current Air Quality Action Plan in July 2022. The plan outlines the measures which will be taken by LBL to improve air quality across the borough. This report provides an update on the progress which has been made since the plan was approved.

It is recommended that the Sustainable Development Select Committee:

- Note the progress which has been made against the measures in the Air Quality Action Plan.

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

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 statutory duty to manage local air quality. The AQAP sets out the commitment and actions that will be undertaken by LBL to improve air quality between 2022 and 2027. The AQAP includes measures (and key progress indicators) that have been adopted by LBL to deal with air pollution and avoid unacceptable harm being caused to human health and the environment.
- 1.2. Since the adoption of the AQAP in July 2022, areas of key progress include the work which has been achieved with schools in the borough which has included undertaking 10 air quality audits at selected schools across the borough. Anti-idling signage was put up at 75 locations near schools around the borough in 2022. Interactive air quality workshops and idling events have been undertaken at 10 schools across the borough to support the anti-idling campaign work. Working with schools as part of the School Super Zone Project has also had a positive impact on air quality.
- 1.3. The Public Health team have also been successful in receiving funding for another School Super Zone project which includes two primary schools: Kender and Edmund Waller. This project will be progressed in 2023/24.
- 1.4. The Environmental Protection team have been awarded a grant from the DEFRA Air Quality Fund. The funding is to deliver a four-year air quality measurement campaign, using air quality sensors. The focus of the project will be around solid fuel burning and schools. The project is currently in the process of being procured.

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2. Recommendations

2.1. The Sustainable Development Select Committee is being asked to

Note the progress which has been made against the measures in the Air Quality Action Plan.

3. Policy Context

3.1. This report aligns with Lewisham's Corporate Priorities, as set out in the Council's [Corporate Strategy \(2022-2026\)](#):

- Cleaner and Greener
- A Strong Local Economy
- Quality Housing
- Children and Young People
- Safer Communities
- Open Lewisham
- Health and Wellbeing

3.2. In particular, this report is closely aligned to the priority Cleaner and Greener because the report sets out the progress which has been made to date against measures in the AQAP, which are working towards improving the air quality within the borough and making it a healthier place for our residents and children to live.

3.3. LBL has a statutory duty to comply with and follow national legislation and guidance set by DEFRA, the Greater London Authority (GLA) and the Mayor of London in respect to air quality.

3.4. Delivery of the measures within the AQAP supports the following Council plans and strategies:

- Climate Emergency Action Plan (2020)
- Transport Strategy and Local Implementation Plan 2019-2041
- Cycling Strategy (2017)
- Draft Health and Wellbeing Strategy 2021-2026
- Lewisham Manifesto Commitments 2022-26

4. Background

4.1. The LBL AQAP was approved in July 2022. The plan outlines the measures which will be taken by LBL to improve air quality across the borough.

4.2. LBL have a statutory obligation to produce an Annual Status Report (ASR) which has to be submitted to DEFRA and the GLA annually. The ASR includes monitoring data for the year and documents progress against the measures within the AQAP.

4.3. The Air Quality Strategic Board and Air Quality Working Group which is chaired by the

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Director for Public Health have been tracking progress against the AQAP through quarterly meetings.

- 4.4. This report provides an update on the progress which has been made against the measures in the AQAP.

5. Air Quality Action Plan (AQAP) 2022-2027 Progress

- 5.1. The LBL AQAP was approved in July 2022. The first update on progress against the measures in the AQAP was provided to DEFRA and the GLA in the 2023 ASR. This document has received sign off from both parties and will be published on the Council's website once it has been through the internal governance process for approval.
- 5.2. This report details key progress which has been made on each of the themes within the AQAP. A full update on progress against all of the measures within the AQAP can be found in the 2023 ASR which will be published on the Council's website.
- 5.3. Air Quality Monitoring
- 5.4. LBL's air quality monitoring network has been expanded during 2022, to include 40 additional tubes which were deployed around schools, care homes and in areas of significant traffic in the borough. There are a total of 141 diffusion tube sites across the borough.
- 5.5. For London Local Air Quality Management (LLAQM) reporting purposes data is compared to DEFRA's National Air Quality Objectives (AQOs). However, LBL is committed to working towards the World Health Organisation (WHO) Air Quality Guidelines (AQGs), these are more ambitious than DEFRA's current national AQOs and are also supported by the Mayor of London's air quality initiatives. Data from 2022 has been compared to the DEFRA AQO's and the WHO AQGs for completeness.
- 5.6. No diffusion tube locations exceeded the annual mean NO₂ AQOs set by DEFRA of 40 µg m⁻³ during 2022. All of the diffusion tube locations exceeded the annual mean NO₂ WHO AQGs of 10 µg m⁻³ during 2022. All monitoring locations measured an overall decreasing trend in annual mean NO₂ concentrations since 2016. On average, the decrease between 2016 and 2022 at diffusion tube sites was 43% for the seven-year period.
- 5.7. There are five automatic monitoring stations in operational within LBL located at Laurence House, Catford (LW6), New Cross (LW2), Loampit Vale (LW4), Depford (LW5) and Honor Oak Park (HP1). The 2022 annual mean NO₂ concentrations at automatic monitoring sites overall exhibited a continuation of the decreasing trend observed over the seven-year period between 2016 to 2022. In 2022, there were no exceedances of the hourly mean NO₂ AQO of 200 µg m³ at any of the five automatic monitoring locations. As a result of the stricter air quality objectives set by WHO, the annual average NO₂ concentrations are exceeding the guidelines provided by WHO. In 2022, the highest reading provided from all the automatic monitoring stations was at LW4, with an annual mean NO₂ concentration of 38.4 µg m⁻³. To meet compliance standards, an improvement of 74% is required.
- 5.8. In 2022, all three monitoring sites (LW2, LW4, HP1) which measure PM₁₀ were well below the AQO of 40 µg m⁻³ for the annual mean. In 2022, LW4 and HP1 each measured 3 instances where the 24-hour mean was greater than the AQO value of 50 µg m⁻³, whereas LW2 had 1 instance above this value during the year. However, these are well below the 35 permitted each year, meaning all monitoring stations achieved compliance with the 24-hour mean AQO. Comparing to the WHO benchmark, HP1 has successfully attained compliance for the PM₁₀ annual mean since 2019. Conversely,

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both LW2 and LW4 have consistently exceeded the standard for more than 5 years. LW2 presents the highest reading in 2022 which requires a reduction of 62% to align with the WHO guideline of 15 ug m-3 .

- 5.9. PM_{2.5} concentrations are monitored at LW2, HP1 & LW5. In 2022, all sites measured annual mean concentrations below the annual mean PM_{2.5} AQO value of 20 µg m⁻³. When compared to the WHO guidelines, all 3 automated monitoring sites are exceeding the 5 ug m-3 annual mean threshold for 2022. To achieve compliance, LW2 requires a reduction of approximately 60%.
- 5.10. Lewisham receives quarterly reports for 20 Breathe London sensors/nodes installed across the borough. These sensors also monitor PM_{2.5} concentrations. The data and locations of the nodes can be viewed online at the [breathelondon](https://breathelondon.org/) website and is available on the Council website.
- 5.11. An [Interactive Map](#) has been developed which allows users to compare air quality levels in Lewisham with the DEFRA AQOs and the WHO objectives, this was released as part of the Council's Clean Air Day 2023 promotional work.
- 5.12. Emissions from Developments and Buildings
- 5.13. 100% of relevant planning applications were confirmed as Air Quality Neutral in compliance with relevant planning policy.
- 5.14. All Major applications are being assessed through the Development Management process to ensure that they achieve an Urban Greening Factor of 0.4.
- 5.15. Lewisham Council has used the RE:FIT/Retrofit Accelerator Workplaces framework to deliver works funded through the Public Sector Decarbonisation Scheme. A retrofitting webpage has been created to provide advice to residents about improving the energy efficiency of their home. The retrofitting webpage has been promoted through social media and digital channels.
- 5.16. Techno economic studies have been undertaken on three areas (Catford, Lewisham and north of the borough) in the borough to look at the feasibility of District Heat Networks this work was completed in May 2022. The outputs from this work are now part of the evidence base for planned and future developments in these areas and will be used to support future grant funding bids to upgrade social housing in North Lewisham.
- 5.17. Lewisham's Housing Retrofit Task & Finish Scrutiny Group set out a range of recommendations aimed at improving the thermal performance of housing in the borough across all tenures. Officers are working on a new Housing Retrofit Strategy that will deliver the assessment of actions. Investment is needed to get all domestic buildings in the borough to the standard needed to meet the net zero ambition. This strategy is expected to be published in 2023.
- 5.18. Deptford Church street cycleway is being developed, the design is underway and construction is programmed to start later in the year. This is part of the Council's Local Implementation Plan (LIP) submission for 23/24.
- 5.19. Public Health and Awareness Raising
- 5.20. The Environmental Protection and Public Health Team are working with schools to raise awareness about the health impacts of air quality not only through the School Super Zone work but also through a set of communication materials which have been developed to use with all schools in the borough and monitor the health impacts more closely.

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- 5.21. The Air Quality Joint Strategic Needs Assessment (JSNA) is being updated with current information on air quality impacts on the population.
- 5.22. An information pack and leaflets are being compiled to raise awareness on the impact of indoor air quality on human health, these will be made available on the Council's webpage to raise awareness of this issue and how people can make improvements in their homes. The Council will also be promoting the communication messages which are being developed by the London Wood Burning Group which will go live this Autumn.
- 5.23. The Public Health team have worked closely with the Transport team to promote the TfL STARS scheme which will create activities to promote a sustainable and safe approach to travel. The Public Health team have supported the Transport Team to work with schools to encourage schools to engage with the TfL STARS scheme and gain accreditation.
- 5.24. The LBL Air Quality School Action Plan has been completed and adopted together with the AQAP. The Council have been supporting and encouraging schools to compile their own AQAPs using the School Super Zone Project to initiate the development of the plans for each school following the prescribed guidance/template. The Public Health and Environmental Protection teams have worked closely together to monitor air pollution using diffusion tubes around prioritised schools in/around GLA focus areas. A set of communication materials are being developed to raise awareness to school children about air pollution and improving air quality. A School Super Zone project was funded by the GLA and implemented within 400m of Haseltine Primary School. Improvements have been made to the school garden and a water fountain is in the process of being installed at Home Park using these funds as well as developing a set of communication materials to raise awareness to pupils.
- 5.25. The Public Health team have also been successful in receiving funding for another School Super Zone project which includes two primary schools: Kender and Edmund Waller. This project will be progressed in 2023/24.
- 5.26. Anti-idling signage was put up at 75 locations near schools around the borough in 2022. Interactive air quality workshops and idling events have been undertaken at 10 schools across the borough to support the anti-idling campaign work.
- 5.27. The Public Health and Environmental Protection team have worked with WSP to carry out air quality audits around 10 schools in Lewisham. The reports are currently being finalised and will then be sent to the schools. The schools will be eligible to access £5000 through the 'School Clean Air 4 All Now Starter Pack' to put towards the measures which have recommended from their audit.
- 5.28. Lewisham Council has commissioned MP Smarter Travel to design and deliver a clean air communications campaign to raise awareness of the harm caused by poor air quality and how individuals can take action to reduce their emissions. An electronic pack will be made available for use by schools to educate children and parents about air quality issues. This project was funded through the School Super Zone project.
- 5.29. Delivery Servicing and Freight
- 5.30. All bidders are obliged to follow the Sustainable Procurement Code of Practice for Contractors 2022. In addition, when Lewisham tender there is a 10% allocation against social value (as appropriate) for projects above £50k. The most suitable KPIs are selected by the lead stakeholder and in addition this is then measured in the contract.

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- 5.31. All Council vehicles are Euro VI and the fleet is 100% compliant with ULEZ. A fleet review is due to commence this year.
- 5.32. Localised Solutions
- 5.33. Between June 2021 and June 2022. 790 whips and 174 standard trees have been planted in Parks. 294 standard street trees have been planted in partnership with Street Trees for Living. This partnership means the Council's street trees have an excellent survival rate of 98%, significantly higher than the industry standard of 70%. 57 linear meters of hedgerows were planted at Brookmill, Ladywell, Horniman Triangle and River Pool Linear Park. During the autumn/winter planting season (Q3/Q4 of the financial year 2022/23) 558 street trees were planted.
- 5.34. Cleaner Transport: Zoning
- 5.35. Anti-idling signage has been put up at 75 locations near schools across the borough in 2022. NSL enforcement staff have given advice and warnings to drivers.
- 5.36. Cleaner Transport: Programme
- 5.37. The Lewisham Schools Air Quality/Idling workshops started in November 2022. Idling signage has been installed in key locations and banners have been produced for schools. This work will be reviewed and integrated into the Climate Emergency Communications Forward Plan.
- 5.38. Officers continue to work with car club operators across the borough to increase the number of residents using car clubs instead of private vehicles. As part of the Sustainable Streets programme, more car club bays will be delivered to support an uptake in car clubs.
- 5.39. There are now 46 operational schools streets across the borough with a further 2 ready to be implemented subject to TFL approvals. A further 8 schools are in the design and feasibility stages.
- 5.40. Cleaner Transport: Policy
- 5.41. An emissions based Parking Policy is in place and is being enforced.
- 5.42. Cleaner Transport: Traffic Management
- 5.43. The Strategic Transport and Highways team is reviewing and updating the Borough's cycling strategy as part of an Integrated Active Travel Strategy. This will integrate the national, regional, and local strategies, policies, and guidance with the Borough's existing infrastructure, projects and programmes already in progress, future plans, and predicted needs into one overarching strategy with an associated delivery plan. The Integrated Active Travel Strategy will look at how people travel through the Borough and how a network of safe and low pollution walking and cycling routes can be developed that will provide links to town centres, schools, transport hubs, community centres, large developments, workplaces, and other key destinations and places of interest in the Borough. This strategy will support commitments to promote walking and cycling as preferred modes of travel for shorter journeys and bids for future funding over the next 7 to 10 years, including a submission for LIP funding for 23/24 to deliver active travel improvements within the borough in line with the Transport Strategy.
- 5.44. Cleaner Transport: Infrastructure
- 5.45. Cycleway 4 opened in September 2022. A number of temporary modal filters were introduced across the borough to prioritise cycling during the pandemic. The modal

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filters at Silverdale and Bishopsthorpe Road have been made permanent.

- 5.46. The A21 Lewisham to Catford project which was delivered by TfL as part of the Streetspace for London programme and introduced cycle facilities along the A21 has now been made permanent. It was originally introduced under a Temporary Traffic Regulation Order (TTRO) in September 2020, was transitioned to an Experimental Traffic Order (ETRO) in March 2022, and was made permanent in August 2023.
- 5.47. The Council continues to roll out cycle hangars across the borough, 75 cycle hangars have been installed as part of the LIP funding and there are plans to install a further 75 cycle hangars in 23/24, with plans for an e-bike trial across the borough in 2023.
- 5.48. Cycle facilities along Deptford Church Street are currently going through the design and development phase.
- 5.49. The Council are continuing to deliver cycling contraflow measures along a number of one-way streets, with Frankham Street, Prince Street, Musgrove Road, Elthruda Road, and St Swithuns Road having recently been implemented.
- 5.50. Measures to link a number of green spaces are being developed.
- 5.51. Planning is securing cycle parking on street and in new developments as part of the development management process in accordance with planning policy requirements. It is important to be aware that some of these installations won't require planning permission and could be done directly by Highways team.
- 5.52. The Environmental Protection team have been awarded a grant from the DEFRA Air Quality Fund. The funding is to deliver a four-year air quality measurement campaign, using air quality sensors. The focus of the project will be around solid fuel burning and schools. The project is currently in the process of being procured.

6. Financial implications

- 6.1. Each action proposed in the AQAP 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, and across the Borough as a whole, whilst being achievable at a reasonable cost.
- 6.2. Although specific costs have not yet been finalised for all actions, 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.
- 6.3. 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.
- 6.4. 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

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Air Quality projects from different sources including DEFRA/MAQF and 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.

- 6.5. The report also notes that Officers will continue to identify external funding sources and where appropriate use of s106/Community Infrastructure Levy 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.
- 6.6. The monitoring of the financial expenditure for agreed capital and revenue projects supporting these strategies forms part of the regular council wide monitoring procedures.

7. Legal implications

- 7.1. The air quality objectives set out in the Air Quality (England) Regulations 2000 (as amended by the Air Quality (England) (Amendment) Regulations 2002)) provide the statutory basis for the air quality objectives under the local air quality management system in London. Supervision of the local air quality management system in London is devolved to the Mayor of London, who has wide powers to intervene and direct London local authorities under Part IV of the Environment Act 1995. London boroughs must have regard to any advice or guidance from the Mayor of London and Defra. Preparation of an ASR is in accordance with such guidance. If the GLA has concerns regarding the conclusions in the ASR, the Council will be invited to provide written comments justifying their decision within a specified deadline.

8. Equalities implications

- 8.1. The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act,
 - advance equality of opportunity between people who share a protected characteristic and those who do not,
 - foster good relations between people who share a protected characteristic and those who do not.
- 8.2. Improving air quality is likely to improve the health of the general population but mostly those living in deprived areas located around Air Quality Focus Areas and from the Black, Asian and Minority Ethnic (BAME) groups.
- 8.3. The Equality Impact Analysis carried out during the development of the current Air Quality Action Plan showed that the measures within the action plan impacted on all groups positively overall and the ones that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers,

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members of the Lesbian, Gay, Bisexual & Trans community and BAME groups.

- 8.4. Areas of low employment and income, where the most deprived are likely to be affected by poor air quality, are most likely to benefit from this project.

9. Climate change and environmental implications

- 9.1. The council has made a commitment to making the borough carbon neutral by 2030.
- 9.2. The implementation of the measures within the Air Quality Action Plan support the delivery of the Climate Emergency Action Plan.

10. Crime and disorder implications

- 10.1. There are no crime and disorder implications.

11. Health and wellbeing implications

- 11.1. The implementation of the AQAP will have a positive impact on air quality within the borough, which will have a direct impact on health, mental health and wellbeing.

12. Background papers

- 12.1. [Air Quality Action Plan dated July 2022](#)

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13. Glossary

Term	Definition
AQAP	Air Quality Action Plan
AQG	Air Quality Guideline
AQO	Air Quality Objective
ASR	Annual Status Report
BAME	Black, Asian and Minority Ethnic
DEFRA	Department for Environment, Food and Rural Affairs
GLA	Greater London Authority
JNSA	Joint Strategic Needs Assessment
LBL	London Borough of Lewisham
LIP	Local Implementation Plan
LLAQM	London Local Air Quality Management
NO ₂	Nitrogen Dioxide
MAQF	Mayor's Air Quality Fund
PM _{2.5}	Particulate matter less than 2.5 micron in diameter
PM ₁₀	Particulate matter less than 10 micron in diameter
STARS	Sustainable Travel: Active, Responsible, Safe
TfL	Transport for London
ULEZ	Ultra Low Emission Zone
WHO	World Health Organisation

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