



Sustainable Development Select Committee

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

Date: 10 September 2024

Key decision: No

Class: Part 1

Ward(s) affected: All

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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 presenting to the board in September 2023.

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 working with them to identify the mitigation measures from the air quality audits which they could spend the £5000 Air Quality Starter Pack on. One of the highlights was the Big Schools Climate Conference which was run in partnership with the Horniman Museum, which included workshops (one specifically focused on air quality), creative events and discussion with 10 primary schools in January 2024. Anti-idling signage was put up at 75 locations near schools around the borough in 2022. Officers continue to work with head teachers and parents to reduce air pollution around schools with workshops on air quality and idling. Working with schools as part of the School Super Zone Project has also continued to have a positive impact on air quality.
- 1.3. The Environmental Protection team have been awarded a grant from the Mayors Air Quality Fund. The funding is to deliver an innovative pollution mitigation measure (Roadvent) at a location near a school or nursery in an Air Quality Management Area and Air Quality Focus Area and to measure the impact that the measure has on air pollution and exposure. The project will provide an opportunity to raise awareness and to promote the uptake of active travel considering the vast reduction in personal air pollution exposure during the school commute and allow the community to participate in a citizen science project.

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

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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 (2024)
 - Transport Strategy and Local Implementation Plan 2019-2041
 - Cycling Strategy (2017)
 - Draft Health and Wellbeing Strategy 2021-2026
 - Lewisham Manifesto Commitments 2022-2026

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 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 which has been published on the Council's website. The 2024 ASR was submitted to DEFRA and the GLA on 31 July 2024 and we are currently awaiting approval, before the report goes through the internal governance process before being published on the website.
- 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 the measures within the AQAP can be found in the 2024 ASR which will be published on the Council's website in due course.
- 5.3. **Air Quality Monitoring**
- 5.4. LBL's air quality monitoring network has been expanded during 2023, to include 3 additional tubes which were deployed along Lewisham High Street and Lewis Grove to support the regeneration project in Lewisham High Street/Market. There are a total of

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- 144 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 2023 has been compared to the DEFRA AQO's and the WHO AQGs for completeness.
 - 5.6. One diffusion tube (L95 – located on Lewis Grove) exceeded the annual mean NO₂ AQOs set by DEFRA of 40 µg m⁻³ during 2023. It is situated near a busy junction and is also in a street canyon due to the road layout, which are believed to be the main contributing factors to this high annual mean NO₂ concentration. All of the diffusion tube locations exceeded the annual mean NO₂ WHO AQGs of 10 µg m⁻³ during 2023. 91% of the pre-existing diffusion tube locations recorded lower annual mean NO₂ concentrations in 2023 than 2022. All monitoring locations measured an overall decreasing trend in annual mean NO₂ concentrations since 2017. On average, the decrease between 2017 and 2023 at diffusion tube sites was 42% 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), Deptford (LW5) and Honor Oak Park (HP1).
 - 5.8. The 2023 annual mean NO₂ concentrations at the sites overall exhibited a continuation of the decreasing trend observed over the seven-year period between 2017 to 2023. For sites LW2 and LW4, the average decreases were 46% and 21% respectively for the seven-year period. In 2023, there was one monitoring site (LW4) which measured an annual mean concentration above the AQO with a measured NO₂ concentration of 42.6 µg m⁻³. LW4 is the only monitoring site where NO₂ concentrations have increased in 2023 compared to the previous monitoring year; monitoring sites LW2, LW5, LW6 and HP1 all recorded lower annual mean concentrations in 2023, in comparison to 2022.
 - 5.9. In 2023, there were no exceedances of the hourly mean NO₂ AQO of 200 µg m³ at any of the five automatic monitoring locations. There was one occasion in 2023 when the hourly mean NO₂ was recorded above 200 µg m³ at Loampit Vale (LW4) (this was the first exceedance in the last 5 years). However, these are well below the permitted 18 hours per year limit, meaning all monitoring stations achieved compliance with the AQO. 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 2023, there was one monitoring site (LW4) which measured an annual mean concentration above the Defra AQO (40 ug/m³) with a measured NO₂ concentration of 42.6 µg m⁻³. LW4 is the only monitoring site where NO₂ concentrations have increased in 2023 compared to the previous monitoring year. To meet WHO AQ guidelines, an improvement of 76.5% is required.
 - 5.10. In 2023, all three monitoring sites (LW2, LW4, HP1) which measure PM₁₀ were well below the AQO of 40 µg m⁻³ for the annual mean. However, sites LW2 and LW4 are in exceedance of the WHO AQG for annual mean PM₁₀ (15 µg m⁻³). In 2023, the highest annual mean concentration was measured at LW2, with a concentration of 22.2 µg m⁻³. For the entire seven-year period between 2017 and 2023, all three monitoring stations measured an overall downward trend with some fluctuations around this trendline. In 2023, LW2 and LW4 measured nine and three instances respectively, where the 24-hour mean was greater than the AQO value of 50 µg m⁻³, whereas HP1 had no instances above 50 µg m⁻³ during the year. However, these are well below the 35 days per year permitted, meaning all monitoring stations achieved compliance with the 24-hour mean AQO. There has been an increase in the number of 24-hour means greater than the AQO threshold value compared to 2022 at LW2, and a decrease at HP1. In the past seven years, the highest recorded number of days where the monitored concentration was greater than the AQO objective value was 11 days at LW2 in 2017.

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- 5.11. PM_{2.5} concentrations are monitored at LW2, HP1 & LW5. In 2023, all sites measured annual mean concentrations below the annual mean PM_{2.5} AQO value of 20 µg m⁻³. However, all monitoring locations exceeded the annual mean WHO AQG for PM_{2.5} of 5 µg m⁻³. Due to low data capture at LW2, annualisation has been carried out. LW2 measured the highest annual mean concentration in 2023 at 9.9 µg m⁻³.
- 5.12. Lewisham receives quarterly reports for 20 Breathe London sensors/nodes installed across the borough. These sensors monitor NO₂ and 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.
- 5.13. 100 Airscape sensors are planned to be installed across the borough to gather real-time data starting in Autumn 2024, the data will be available to all on a public platform. This will allow for faster responses to air quality issues and allow the public/community to make informed decisions regarding their health and air quality.
- 5.14. **Emissions from Developments and Buildings**
- 5.15. Following extensive consultation, the Council submitted the Lewisham Local Plan and its supporting documents to the Secretary of State for its independent examination in November 2023.
- 5.16. 100% of relevant planning applications were confirmed as Air Quality Neutral in compliance with relevant planning policy.
- 5.17. All Major applications are being assessed through the Development Management process to ensure that they achieve an Urban Greening Factor of 0.4 for residential developments and an Urban Greening Factor of 0.3 for commercial developments. Biodiversity Net Gain has now become a statutory matter for planning and applies to small and major sites - where 10% improvement must be delivered, the council's planning pages have been updated to reflect this.
- 5.18. Promotion and publicity of woodburning and its impact was undertaken during the Autumn/Winter months as part of the DEFRA funded London Woodburning Project. The whole borough is designated a Smoke Control Area and any complaints regarding wood burning are investigated, this includes providing advice and taking enforcement action if required. This work will be further supported going forward by the Air Quality New Burdens Grant.
- 5.19. Lewisham Council's website provides practical advice to residents on improving the energy efficiency of their home and this information has been promoted via social media and digital channels. The Council has delivered a range of retrofit projects to its corporate buildings and schools with heat pumps replacing end of life and inefficient boilers and is currently delivering retrofit measures in its housing stock with funding from the Social Housing Decarbonisation Fund. The Council has committed to publishing a Housing Retrofit Strategy in 2024/25 which will set out plans to extend improvements on energy efficiency and decarbonisation projects across all tenures of housing in the borough.
- 5.20. The Council has continued to develop the energy master planning work completed in 2020 with detailed techno economic assessments of heat network viability in Catford, Lewisham Town Centre and North Lewisham. The Council has worked closely with Veolia in relation to the potential for built connections from the South East London Combined Heat and Power facility. Further works are in progress at Lewisham Town Centre with local stakeholders to determine the commercial basis for a Green Heat Network Fund bid to support an area-based approach to decarbonisation.
- 5.21. In 2023 the Council was awarded £2.9m under the Social Housing Decarbonisation Scheme enabling retrofit work in the Council's housing stock that will improve thermal efficiency and reduce carbon emissions. This work will be delivered by the end of 2023/24 and continue into the following year. The Council's Housing Retrofit Strategy planned for publication in 2024 will set out the approach to decarbonising all tenures of housing. The Housing thematic of the 2024 Action Plan includes actions relating to the Council's own housing, housing managed by other social landlords, private sector housing and owner occupier properties.

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- 5.22. The Private Sector Housing and Home Improvement Service continues to take action on category 1 health and safety hazards, many of which relate to energy efficiency. Examples include excess cold, damp and mould hazards. We undertake works to remedy these in privately rented housing, via the property licensing and housing enforcement team, and in owner occupied and housing association properties via the housing improvement and assistance team.
- 5.23. The Council is in the process of developing strategies and policies that are consistent with the Council's policy framework, as well as wider regional and national policies and priorities, including the Healthy Streets approach. Specifically, the Council is currently developing, a strategy that identifies and prioritises proposed Healthy Neighbourhood areas, outlines the proposed methodology for delivery including a consultation and engagement plan, and makes recommendations on objectives, monitoring, and possible types of interventions. A strategy that integrates existing policies within Strategic Transport and Highways, alongside other local, regional and national strategies, policies, and guidance into one overarching strategy with an associated delivery plan for active travel improvements over the next 7-10 years. In addition, all projects that are funded by TfL and delivered by the Council are required to adopt the Healthy Streets approach.
- 5.24. **Public Health and Awareness Raising**
- 5.25. 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. Lesson plans and lessons were developed as part of the school Super Zone round 1 project, these will be further developed so that they can be distributed to all schools across the borough.
- 5.26. The Air Quality Joint Strategic Needs Assessment (JSNA) has been updated with current information on air quality impacts on the population and will be finalised and published in due course.
- 5.27. The 'Air Quality in Context' leaflet is due to be reviewed and updated in 2024. Promotion and publicity of woodburning and its impacts were undertaken during the Autumn/Winter months as part of the DEFRA funded London Woodburning Project.
- 5.28. The Public Health team have worked closely with the Transport team to promote the TfL Travel for Life (previously STARS) accreditation scheme which creates 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 Travel for Life scheme and gain accreditation. However, the staffing constraints faced by schools have significantly impacted their engagement with the programme. Currently, 6 schools are accredited across the Borough.
- 5.29. The Council has also continued to expand school streets (49) in the Borough. Currently Lewisham has the 3rd highest proportion of schools with traffic-free School Streets schemes out of all the London boroughs. Two new School Streets are currently planned to be implemented in 2024/25, with another two going through the design and development phase. These School Streets introduce traffic restrictions at school drop off and pick up times to support those wanting to walk, cycle or scoot to school, and to help to create a calmer, safer and cleaner environment near to the school gates.
- 5.30. The LBL Air Quality School Action Plan has been completed and adopted together with the AQAP. The Council continues to support and encourage schools to compile their own AQAPs using the School Superzone Project to initiate the development of the plans for each school following the prescribed guidance/template.
- 5.31. A Round 4 School Superzone project has been funded by the GLA (£29,500), for a superzone to be implemented around Kender Primary School and Edmund Waller Primary School. This is the first time a superzone has encompassed two schools. The project is due to commence in 2024. The project will include air quality and anti-idling workshops at both schools.

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- 5.32. Anti-idling signage was put up at 75 locations near schools around the borough in 2022. The enforcement of idling vehicles is undertaken by the Parking Service and this area of enforcement is challenging due to the limited engagement with the drivers of the vehicles, who often leave the area before engagement and/or enforcement can take place. Officers continue to work with head teachers and parents to reduce air pollution around schools with workshops on air quality and idling.
- 5.33. A bid for funding under the Public Sector Decarbonisation Scheme Phase 3b was approved in early 2023. Works at Donderry School and Honor Oak Community Centre to decarbonise heating are expected to commence in 2024. A Heat Decarbonisation Plan for the Council's main corporate sites was completed in March 2023, external grant funding for a similar programme for Schools has been secured with the work completing in March 2024.
- 5.34. The Council, in partnership with the Horniman Museum, ran a Big Schools Climate Conference with workshops, creative events and discussion with 10 primary schools in January 2024. The day involved 4 workshops including one on air quality which was run by MP Smarter Travel, a Dragon's Den where pupils could pitch for funding for their school to undertake a climate change project and an art competition.
- 5.35. The Council's sustainable drainage in schools project won the Trees for Nature and Climate Award at the London Tree and Woodland Awards 2023. Rain gardens and trees in the playgrounds of Rathfern, John Stainer and Deptford Park schools alongside engagement programmes with pupils and teachers have transformed the outdoor space of the schools while delivering 150m² new blue infrastructure and draining over 1,700m² hardstanding surfaces. At Thornville Road a new rain garden developed in partnership with the local community and funded through Thames Water's Surface Water Management Programme was installed on the highway in November 2023.
- 5.36. The Public Health and Environmental Protection team have worked with WSP to carry out air quality audits around 10 schools in Lewisham. All schools have received copies of the final audit reports. The schools have been able to access a £5000 Air Quality Starter pack to help them start implementing the measures identified within the air quality audits. All 10 schools have provided their spending plans and the funds are being released.
- 5.37. 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. Lesson plans were developed as part of the project, these will be further developed during 2024 so that they can be distributed to all schools across the borough to educate children and parents about air quality issues.
- 5.38. **Delivery Servicing and Freight**
- 5.39. 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.
- 5.40. Since Lewisham Homes came back into the Council in October 2023, the Council fleet is now no longer 100% compliant with Euro VI and ULEZ as it was in 2022, it is now currently 92.58% compliant with Euro VI and ULEZ. A fleet replacement plan will be submitted to Mayor and Cabinet later this year, this plan will include the costing to transition the fleet to electric as well as replacing like for like and other fuel options (this will consider the creation of a fleet of electric school vehicles for disabled/vulnerable children). The feasibility of all options will be considered, and the outcome will be a decision for the Mayor and Cabinet with a realistic implementation timeline.
- 5.41. **Localised Solutions**
- 5.42. In 2023 to 2024, 675 street trees were planted and 3725 other trees and whips, including 3 tiny forests (600 trees each) in Blythe Hill Fields, Chinbrook Meadows and

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- Forster Memorial Park, and 1800 whips were planted as part of the Beckenham Place Park East project.
- 5.43. **Cleaner Transport: Zoning**
- 5.44. 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. The enforcement of idling vehicles is undertaken by the Parking Service and this area of enforcement is challenging due to the limited engagement with the drivers of the vehicles, who often leave the area before engagement and/or enforcement can take place. Officers continue to work with head teachers and parents to reduce air pollution around schools with workshops on air quality and idling.
- 5.45. **Cleaner Transport: Programme**
- 5.46. 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 has been reviewed and integrated into the Climate Emergency Communications Forward Plan.
- 5.47. Officers continue to work with car club operators across the borough to increase the number of residents using car clubs instead of using private vehicles. As part of the Sustainable Streets programme, more car club bays will be delivered to support an uptake in car clubs.
- 5.48. There are now 46 operational school streets across the borough with a further two new School Streets currently planned to be implemented in 2024/25, with another two going through the design and development phase.
- 5.49. **Cleaner Transport: Policy**
- 5.50. An emissions based Parking Policy is in place and is being enforced.
- 5.51. **Cleaner Transport: Traffic Management**
- 5.52. 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. Stakeholder engagement sessions were held in November 2023, which included key stakeholder groups such as Lewisham Cyclists and Lewisham Pedestrians as well as elected members, the feasibility of new walking and cycling routes is being investigated and is expected to be finalised at the end of January 2024. A draft strategy document and associated maps, expected by March 2024, which will cover the type and length of any proposed cycle lanes. A public and stakeholder consultation will also be undertaken on the strategy.
- 5.53. **Cleaner Transport: Infrastructure**
- 5.54. The Electric Vehicle (EV) Infrastructure Implementation Plan 2023 – 2026 was adopted as policy in July 2023. The total number of EV charging points delivered by the Council to date is 250. The programme to roll out EV charging points across the borough is continuing, and it is primarily driven by the Sustainable Streets programme in the areas that adopt the proposed measures. The Council have secured £102,080 of funding through the On-Street Residential Chargepoint Scheme (ORCS) and £71,136 through the Local Electric Vehicle Infrastructure (LEVI) Capability Funding. An application for LEVI capital funding to deliver electric vehicle charging infrastructure will be prepared in summer 2024 through a borough partnership with the Royal Borough of Greenwich.
- 5.55. The funding secured through the Cycleways Network Development (CND) stream for 2024/25, which was based on bids submitted by the Council, amounted to £774k. This increased by 135% from 2023/24 and was the 5th highest out of all London boroughs. The Council is on track with its targets for the delivery of secure cycle storage facilities,

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- with a total of 232 cycle hangars having been installed to date.
- 5.56. Cycle facilities along Deptford Church Street have been designed with construction currently anticipated to start between summer and autumn 2024.
 - 5.57. The dockless bike programme and partnership with Lime, which is expanding and improving the operation of cycle hire across the Borough and is delivering marked designated parking bays for e-bikes.
 - 5.58. Implementation of cycle contraflow facilities to 6 existing one-way roads and design and development to deliver another 6 in 2024/25.
 - 5.59. Measures to link a number of green spaces have been developed including the replacement of the existing footbridge at Waterlink Way, which is part of the National Cycle Network and connects several parks and green spaces in Southeast London and deliver safety and accessibility improvements.
 - 5.60. 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 the Highways team.
 - 5.61. The Environmental Protection team have been awarded a grant from the Mayors Air Quality Fund. The funding is to deliver an innovative pollution mitigation measure (Roadvent) at a location near a school in an Air Quality Management Area and Air Quality Focus Area and to measure the impact that the measure has on air pollution and exposure. The project will provide an opportunity to raise awareness and to promote the uptake of active travel considering the vast reduction in personal air pollution exposure during the school commute and allow the community to participate in a citizen science project.
 - 5.62. The Environmental Protection team were awarded a grant from the DEFRA Air Quality Fund in 2023. 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 has now been procured and work has commenced on delivering the project with our delivery partner 'Ricardo AEA'.

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 pollutants in the AQMA's, and across the Borough as a whole, whilst being achievable at a reasonable cost.
- 6.2. 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.
- 6.3. For those actions requiring Council funding which cannot be met from existing budgets, services will continue to bid for and secure grants 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 TfL. For example, £173k external funding has been secured to support the Electric Vehicle (EV) Infrastructure Implementation Plan, and £774k for the Cycleways Network Development. 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.
- 6.4. Officers will continue to use s106/Community Infrastructure Levy funding to deliver the outcomes outlined in the action plan where such funding is available and appropriate. The monitoring of the financial expenditure for agreed capital and revenue projects

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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 AQAP 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, 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 AQAP 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.

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12. Background papers

- 12.1. [Air Quality Action Plan dated July 2022](#)
- 12.2. [2023 Annual Status Report](#)

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

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Term	Definition
WHO	World Health Organisation

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