

Cabinet

Tuesday 18 July 2017

4.00 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London
SE1 2QH

Appendices

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Air Quality Strategy & Action Plan

April 2017

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Foreword

The impact of poor air quality on human health is significant and beyond doubt. Local air quality is a public health priority for Southwark and we have performance indicators regarding improving air quality listed in the current council plan. We are fully committed to doing all we can to encourage our services, local businesses and residents to consider air quality in the choices they make and everything they do.

I am very pleased to endorse to you Southwark's revised and improved Air Quality Strategy and Action Plan 2017 – 2022. Our last Air Quality Action Plan, which covered the period 2012 - 2017, and the many successful air quality improvement projects Southwark have initiated over and above that, have really helped to improve local air quality, but there is much more for us to do. Major previous successes have included:

- Southwark's cycling strategy was adopted by Cabinet in June 2015, which sets out a clear vision for cycling in the borough. We want cycling to be for the many, not the few, with people from all over Southwark of all ages, abilities and backgrounds feeling able to cycle safely. We are now well into a 5 year, £30m investment programme of cycling and walking improvements
- We have run integrated cycling and air quality campaigns in the summer and campaigns to discourage the burning of wood and coal in the winter. We have also been into many schools delivering free citizen science educational programmes on air quality and provided bike-ability classes
- We have improved the information on air quality on our website. It now includes lots of information on local air quality and ideas that residents can take up to help us all to a future with better, cleaner air
- As new council fleet vehicles are procured emission considerations are at the forefront in the selection process ensuring we select the least polluting fuel type available for new council vehicles
- We use the 'Right Place Right Tree' approach to increase the number of trees in existing open space and on new developments and to create more green links. We have a £6m investment programme to improve existing parks and green spaces
- We oversaw the installation of one of the largest solar power photovoltaic arrays in the capital on the roof of the Old Kent Road Integrated Waste Management Facility (IWMF). The cells cover the roof, a space equivalent to four football pitches, generating enough power for 220 homes giving a Carbon saving equivalent to taking Southwark's entire waste collection fleet off the road for six months

But we can always do more. This revised Air Quality Action Plan lists **113** actions that Southwark will undertake under the new London Local Air Quality Management Framework that was

announced by the GLA in 2016. It gives clear actions and anticipated targets for delivery that we know will be deliverable. These actions will be the minimum that Southwark will deliver. We anticipate that in the fast moving arena of air quality, new research, new technology, new ideas, new partnerships and new funding opportunities will present themselves and we will consider how these can be applied for the benefit of Southwark residents as they come to light.

Southwark fully supports the Mayor of London's aims for the improvement of air quality in London and we will be reporting annually to the Mayor on our progress with regard to the actions listed in this action plan and on the extra actions we take.



A handwritten signature in black ink that reads "Ian Wingfield".

Councillor Ian Wingfield
Cabinet Member for Environment & Public Realm

The following Officers of the Council endorse this document.



Professor Kevin Fenton
Director of Public Health & Wellbeing



Simon Bevan
Director of Planning

1 - Introduction

As part of the UK National Air Quality Strategy, the Environment Act 1995 requires Local Authorities to declare Air Quality Management Areas at locations where air quality does not meet the objective limits for certain pollutants. Where an Air Quality Management Area has been declared local authorities must have a consulted and approved Air Quality Action Plan to reduce the relevant atmospheric pollutant/s within that area so, that at some point in the future, the area will meet the national air quality objective limits. For details of the current national air quality objective limits see Appendix 1.

Since the publication of the 2002 Southwark Air Quality Strategy and Air Quality Action Plan there have been a number of changes in both national and regional air quality policy. This document outlines the revised Air Quality Strategy and Action Plan for Southwark, detailing a range of aims and objectives that we will seek to achieve in the period 2017 – 2022.

Sources of atmospheric pollution in Southwark Council

The main atmospheric pollutants of concern in Southwark are Nitrogen Dioxide (NO₂) and Particulate Matter (PM) with fractions PM₁₀ (breathable) & PM_{2.5} (able to pass into blood stream). The main source of both pollutants locally is traffic emissions. Large scale combustion plant, construction sites and domestic heating also contribute.

The Southwark area is not currently meeting legal limits for all pollutants regulated by EU legislation. NO₂ is a serious challenge as it often exceeds the objective limits, especially in the area inside the inner ring road and along main road corridors. In 2013 45% of the population of Southwark was exposed to levels of NO₂ above the annual average objective limit (LAEI, 2013). It is known that there is no 'safe' limit for PM, so even where the objective limits for PM fractions are not exceeded, a reduction in particulates would further protect human health. For information on the health impacts of atmospheric pollutants see Appendix 2.

Due to the NO₂ objective limit being exceeded in a large portion of the borough and the PM objective limit being exceeded in a small number of locations, Southwark declared an Air Quality Management Area.

The following information can be found in Appendices 3 & 4 attached to this document:

- Map of the current Southwark Air Quality Management Area,
- Map of the modelled emissions of NO₂
- Map of the modelled emissions of Particulates (PM₁₀ & PM_{2.5}), and
- Data on the pollutant source apportionment (i.e. what are the sources of the emissions to air)

The health impact of atmospheric pollution

Recent analysis by the Institute for Health Metrics & Evaluation estimates that air pollution is ranked as the 10th largest risk factor for mortality and ill-health in England. Recent studies have calculated that poor air quality affects the health of approximately 9,500 Londoners every year.

There is a strong body of evidence which shows that short term exposure to high levels of air pollution has a range of adverse health effects. These can range from exacerbation of respiratory conditions such as asthma and chronic respiratory disease, through to an increase in emergency admissions to hospital. Poor air quality disproportionately affects the health outcomes of the very young, the elderly, the ill and the poor.

While short term exposure to air pollution is known to adversely affect health, the relative risk associated with long term exposure is much greater, contributing to the initiation, progression and exacerbation of disease. It is estimated that the average reduction in UK life expectancy associated with air pollution is 6 months and is illustrated by an increasing number of deaths from cardiovascular and respiratory conditions and lung cancer. Public Health England suggest that 7% of adult deaths in Southwark may be attributable to particulate air pollution (measured as fine particulate matter PM_{2.5}). This equates to around 90 deaths per year in the borough.

The equalities impact of atmospheric pollution

All members of the community within Southwark's Air Quality Management Area are affected by poor air quality. A report by the Environment Agency found that areas of the worst exposure to poor air quality generally correlated with areas of deprivation.

There are a number of localities within Southwark that fall within the Government's definition of being an area of deprivation, (Source – Official National Statistics) but, in London there is a complex link between air quality and inequality. In general, more deprived areas are likely to experience higher levels of pollution but there is considerable local variation. The link between deprivation and poor air quality is stronger in outer London. In inner London there are high levels of atmospheric pollution across the board affecting affluent and deprived communities alike.

Fine particles (PM_{2.5}) have the greatest impact on health as they reach the bloodstream, and thus the rest of the body, via the lungs. Young children, those with compromised health and the elderly are the most susceptible to the negative health impacts of poor air quality.

The environmental impact of atmospheric pollution

Poor air quality impacts both biodiversity (plants & animals) and buildings.

Sensitive plants, including commercial food plant species are unable to thrive in polluted environments. Fish and insect populations, and the species that rely on them, cease to thrive in turn. The external surfaces of buildings can become soiled by particulate matter and soot and may also be unduly weathered as atmospheric pollutants dissolve in rainwater as it falls making it acidic.

Studies have shown that local air quality can be impacted by climate change and conversely climate change can impact local air quality. Average temperatures are predicted to continue to increase in future. Hotter, drier summers will increase pollution as some of the chemical reactions that lead to NO₂ formation require sunlight. Additionally, less rain will mean that less particulate fractions will be naturally washed out of the atmosphere. Higher environmental temperatures also make people more sensitive to the effects of pollution. The relationship between climate change, air quality and human health is likely to become more pronounced in future.

2 – Air Quality Strategy

The Air Quality Strategy

The Southwark Air Quality Strategy aims to:

- 1) Comply with the following legislation by:
 - EU Directives 1996/62/EC, 1999/30/EC, 2000/69/EC, 2002/3/EC, 2004/107/EC and 2008/50/EC
 - The Environment Act 1995
 - The Environmental Protection Act 1990
 - The Clean Air Act 1993
 - The Air Quality Standards Regulations 2010 & 2011

- 2) Comply with the GLA London Local Air Quality Management Framework by:
 - Having an up to date valid Air Quality Strategy
 - Regularly reviewing the area covered by Southwark's Air Quality Management Area
 - Having an Air Quality Action Plan listing actions to:-
 - ✓ Manage local air quality Southwark
 - ✓ Reduce emissions from buildings
 - ✓ Increase public awareness of local air quality & related public health issues
 - ✓ Reduce emissions from road traffic
 - ✓ Reduce carbon emissions
 - ✓ Regulate effectively to protect local air quality
 - Delivering the Air Quality Action Plan
 - Monitoring local air quality by maintaining our monitoring and improving it when resources are available
 - Providing an Annual Status Report and Annual Status Summary Report giving the detail of the results of local air quality monitoring and our progress against the Air Quality Action Plan
 - Working in partnership with the UK Government, GLA, other London Boroughs and locally based third party organisations such as Business Improvement Districts to deliver the improvements listed in the Air Quality Action Plan

3) Support the GLA's air quality objectives by:

- Retaining Southwark's Cleaner Air Borough Status
- Supporting, where possible and appropriate, the Mayor of London's air quality policies, objectives and actions
- Working with the Mayor of London's office to promote good environmental awareness and practice to business, commerce, road users and the general public
- Being mindful of the content of the London Plan and relevant Planning Guidance
- Lobbying for equality of access to clean air for all Londoners

4) Support the local public health framework objectives by:.

- Maintaining local air quality as a local public health priority
- Bidding for funds from any organisation offering relevant bidding opportunities to resource air quality improvement actions and projects within Southwark
- Ensuring a cohesive suite of council policies by co-ordinating local air quality policy with other relevant local policy documents, such as:-
 - ✓ Local Development Framework – The Southwark Plan & Core Strategy
 - ✓ Local & regional planning policy & special planning guidance
 - ✓ Transport Plan
 - ✓ Kerbside Strategy
 - ✓ Sustainability Strategy
 - ✓ Carbon Reduction Action Plan
 - ✓ Housing & Modernisation Programme
 - ✓ Tree Planting, Parks & Green Space Strategies

3 – Strategic Air Quality Action Plan

Strategic Aims	Objectives	Action number
Manage local air quality	Monitor local air quality	1.1 to 1.4
	Comply with the requirements of the London Local Air Quality Management Framework	1.5 to 1.11
	Devise a communication plan for air quality	1.8
Reduce emissions from buildings	Provide technical guidance on air quality assessment & mitigation	2.1 to 2.2
	Use planning process to reduce emissions from new and refurbished developments and to implement the highest environmental standards for emissions to air	2.3
	Raise awareness regarding heating fuel economy	2.4
	Low emission neighbourhoods	2.5
Increase public awareness	Encourage active travel including walking & cycling	3.1 to 3.7
	Publicise air-Text air quality forecasts and cleaner routes for active travel	3.9
	Ensure web-based information and guidance on air quality is available and up to date	3.10
	Run communication campaigns on personal and business behaviour change to improve air quality	3.11
	Provide guidance on how to improve air quality to public	3.12 to 3.13
	Work with clinicians to ensure information on the health impact of environmental air quality is passed to relevant patients	3.14
	Provide advice to schools on air quality issues	3.15
Reduce emissions from road traffic	Promote freight consolidation	4.1 to 4.6
	Encourage logistics fleets operation in the borough to get FORS scheme Silver accreditation	4.5
	Reduce emissions from Southwark Council's vehicle fleets	4.7 to 4.11
	Ensure Southwark Council's travel plan is up to date	4.12 to 4.13
	Reduce road traffic emissions	4.14 to 4.25
	Reduce vehicle emissions from the school run	4.26 to 4.27

Strategic Aims	Objectives	Action number
	Support the extension of ULEZ to cover the whole of Southwark and support any future extension to the M25	4.17
	Reduce vehicle idling	4.19 to 4.22
	Variable parking charges based on fuel type	4.23 to 4.24
	Air quality around schools	4.26 to 4.29
	Promote reduction of private vehicles	4.30
Reduce Carbon emissions	Promote reduced fuel/energy consumption from buildings	5.1 to 5.6
	Improve the energy efficiency of buildings managed by Southwark Council	5.7 to 5.11
	Install renewable energy technologies to Southwark Council buildings	5.12 to 5.16
	Use planning policy to reduce local atmospheric emissions	5.17 to 5.18
	Increase the no. of council homes using renewable energy from SELCHP	5.19
Regulation	Discourage & prevent the burning of unauthorised fuels in Southwark's Smoke Control Zone	6.1 to 6.2
	Ensure all Part B EPA'90 processes in the borough maintain compliance with their permits	6.3
	Green infrastructure	6.4
	Healthy Streets	6.5
	Construction sites	6.6 to 6.8
	Discourage and prevent bonfires and open burning	6.10 to 6.11
Support the GLA	Take air quality improvement action within GLA Air Quality Focus Areas	7.1 to 7.12
	Retain Southwark's Cleaner Air Borough status	7.13
	Support the extension of the ULEZ to cover the whole of Southwark and support any future extension to the M25	7.14
	Support the GLA's planning policy	7.15
	Support and lobby for cleaner air for all Londoners	7.16 to 7.17
Support the Public Health Framework Objectives	Include local air quality in Southwark Council's Joint Strategic Needs Assessment	8.1 to 8.2
	Retain local air quality as a public health priority	8.3
	Ensure local air quality is considered in all relevant policy documents	8.4
	Devise a local cascade for poor air quality alerts	8.5

Appendix 1 – Air Quality Action Plan Work Streams

Section 1 – Manage Local Air Quality								
Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations/ benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
1.1	Air quality monitoring	Maintain the two continuous air quality monitoring stations	Ensure that the air quality monitoring stations at the Elephant & Castle and the Old Kent Road are maintained, serviced and calibrated to current guidance	90% data capture	To inform air quality policy	Environment & Social Regeneration	Environmental Protection	December 2022
1.2		Maintain the NO ₂ diffusion tube survey.	Ensure that the NO ₂ diffusion tube monitoring is maintained in accordance with current guidance	The collection and deployment of diffusion tubes is carried out on 100% of the dates set by Defra	To inform air quality policy	Environment & Social Regeneration	Environmental Protection	December 2022
1.3				100% of tubes collected analysed & results to be displayed on the Southwark website	To inform air quality policy	Environment & Social Regeneration	Environmental Protection	December 2022
1.4		Review the use of low-cost sensor technology to support air quality modelling	Support the University consortium 'Managing air for green inner cities' (MAGIC) project (London Road)	Receive a copy of the project report & conclusions on the use of low-cost sensor technology	To inform air quality & planning policy	Environment & Social Regeneration	Environmental Protection	December 2022
1.5	London Local Air Quality Management Framework	Prepare and produce all London Local Air Quality Management Framework reports as required	All reports required by the London Local Air Quality Management Framework produced and submitted	Reports submitted to Defra and GLA by deadline	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	December 2022
1.6		Respond to all appropriate air quality consultations	Review all air quality consultation requests and respond where appropriate	100% of appropriate air quality consultation responses submitted by deadline	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	December 2022
1.7		Ensure the air quality action plan is current	Review the local air quality action plan to ensure it is up to date	Review air quality action plan annually	NO ₂ & PM	Environment & Social Regeneration	Environmental Protection	By May each year
1.8		Have a communication plan for relevant air quality improvement actions	Devise a communication plan	Review air quality communication plan annually	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection & External Affairs	By June each year

Section 1 – Manage Local Air Quality

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
1.9		Support the Mayor of London's call for a government scrappage scheme for private diesel vehicle	Public statement/s of support from Cabinet Member	3 published statements of support	NO ₂ , PM & CO ₂	Chief Executive	Policy & Public Affairs	December 2018
1.10		Support the Mayor of London's call that the Government should modify the Vehicle Excise Duty regime to disincentive the purchase of diesel vehicles	Public statement/s of support from Cabinet Member	3 published statements of support	NO ₂ , PM & CO ₂	Chief Executive	Policy & Public Affairs	December 2018
1.11		Support the introduction of a new or revised Clean Air Act that improves public protection from atmospheric pollution	Explore whether there is support for new or revised Clean Air Act or a new London Act with the GLA and London Councils	Write to GLA & London Councils and attend any relevant meetings or seminars and respond to all written consultations within deadline	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	December 2018

Section 2 – Reduce Emissions from Buildings

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
2.1	Local Air Quality Assessments	Ensure that Southwark Council's air quality technical guidance provides the latest advice on air quality assessment and mitigation	Devise air quality technical guidance	Produce technical guidance & review it annually.	NO ₂ & PM	Environment & Social Regeneration	Environmental Protection	December 2017 ongoing
2.2			Include the air quality technical guidance standards in an SPD	Explore and timetable including air quality technical guidance standards in an SPD	NO ₂ & PM	Chief Executive	Planning Policy	2019
2.3	Environmental Standards	Planning applications assessed to ensure that all developments will meet the requirements of the local air quality technical guidance	Assessment of all relevant planning applications with reference to the air quality technical guidance	100% of relevant planning applications assessed.	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	December 2017
2.4	Increase the awareness of residents, businesses & visitors of the need to reduce emissions to atmosphere	Promote the reduction of total emissions to atmosphere	Public information campaign on domestic or commercial heating fuel type and fuel economy	1 campaign each year	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection, External Affairs (& BIDS and Business Forum if commercial campaign)	December 2017 ongoing
2.5	Low Emission Neighbourhood	Review the effectiveness of the pilot GLA funded Low Emissions Neighbourhoods projects	Review the evaluation reports from the MAQF Low Emission Neighbourhoods schemes	Review any reports produced within 12 months and report on lessons learned and their potential application in Southwark	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection Team	July 2019 ongoing

Section 3 – Public Health Education & Awareness

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale	
3.1	Encourage residents and those working in the borough to walk and cycle	Encourage children and parents to walk or cycle to school or nursery	Promote School Travel Plans & increase the number of schools attaining TfL STARs Silver or Gold accreditation each year	Increase the number of schools with TfL STARs Silver accreditation by 7 schools or nurseries each year	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	July 2018 ongoing	
3.2				Increase the number of schools with TfL STARs Gold accreditation by 5 schools or nurseries each year	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	July 2018 ongoing	
3.3		Encourage Southwark staff to commute by walking or cycling	Provide greater access to cycles for staff	Promote the Authority's Travel Plan.	Annual promotion of the Travel Plan	NO ₂ , PM & CO ₂	Housing & Modernisation	Facilities Management	May 2018 ongoing
3.4				Promote the use of pool cycles &/or provide cycling offer annually	NO ₂ , PM & CO ₂	Housing & Modernisation	Facilities Management	May 2018 ongoing	
3.5				If pool cycle demand exceeds capacity. Introduce additional pool cycles to meet demand	NO ₂ , PM & CO ₂	Housing & Modernisation	Facilities Management	May 2018 ongoing	
3.6		Encourage employees of businesses in Southwark to commute by foot or cycle	Encourage employees of businesses in Southwark to walk or cycle through the promotion of business specific travel plans	An increase in the number of people walking or cycling for their commute in the Authority's Travel Plan Bi-annual survey	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	June 2018 ongoing	
3.7				Promote active travel through relevant public health work streams and services including physical activity and healthy weight	Include measures to increase active travel in all relevant new & revised public health strategies, action plans and events	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Public Health	Jan 2018 ongoing
3.8	Increase public awareness of air quality forecasting and information on avoidance of high levels of pollutants	Public aware of how to access AirText, CityAir and Walkit apps	Promotion of availability of AirText, CityAir and Walkit apps	Include information on apps in all air quality query responses and on all relevant air quality related promotional information	Protect individual health	Environment & Social Regeneration	Public Health & Environmental Protection	September 2017	
3.9	Evidence based policy	Ensure action to tackle the health impact where air quality information is intelligence led and evidence based	Provide public health advice and guidance on the health impacts of air quality and any mitigating actions	Review all relevant advice and guidance as part of the JNSA process	To inform air quality policy	Environment & Social Regeneration	Public Health	September 2017 ongoing	

Section 3 – Public Health Education & Awareness

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
3.10	Web information on air quality	Southwark website content has comprehensive information and appropriate guidance on air quality	Ensure web-based information is accurate and up to date	Review & update content of air quality web pages annually	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection & Public Health	September 2017 ongoing
3.11	Increase awareness of air quality issues	Public and businesses aware of the impact of their actions on air quality	Communication campaign on personal or business behaviour change to improve air quality	Annual campaign	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection with Transport Planning &/or Highways, Public Health, BIDs, the Business Forum & External Affairs	May 2018 ongoing
3.12		Provide general public with advice on what they can do to improve air quality	Prepare guidance for general public on what they can do to improve air quality	Put guidance on air quality web page and present at community councils	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection, Public Health, Transport Planning & External Affairs	September 2017
3.13		Notify all Community Councils of revised Air Quality Strategy 2017 – 2022	Present Air Quality Strategy 2017 – 2022 at all Community Councils	Present Air Quality Strategy 2017 – 2022 at all Community Councils each time it is revised	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	March 2018
3.14	Protect health vulnerable groups including children the ill and the elderly from poor air quality	Ensure those advising in poor respiratory health with advice on reducing personal exposure to atmospheric pollutants	Work with clinicians via Breathlessness Group of CCG to ensure GPs have access to appropriate prompts, advice and information for use in GP surgery consultations	GPs able to access appropriate prompts, advice and information for use in GP surgery consultations	Protect individual health	Environment & Social Regeneration	Environmental Protection & Public Health	October 2017
3.15		Provide advice to schools and nurseries with regard to improving air quality in and around their premises and on how to avoid high pollution environments	Devise advice to schools on air quality	Schools have information on a range of actions that they can take to improve air quality in and around their premises and on how to avoid pollution	Protect individual health	Environment & Social Regeneration	Environmental Protection, Public Health & Sustainable Travel & Road Safety	June 2017

Section 4 – Reduce Emissions from Road Traffic

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
4.1	Reducing Emissions from Delivery and Servicing	Develop a freight consolidation solution for Southwark	Carry out a joint feasibility study with Lambeth, Wandsworth and Croydon	Feasibility study completed	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	March 2017
4.2			If the feasibility study is positive, implement the preferred solution	Monitor the development of any preferred solution	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection & Procurement	March 2019
4.3				Evaluate the impact of the preferred freight consolidation	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	March 2019 ongoing
4.4		If consolidation centre opens – All Southwark Council suppliers to use the proposed freight consolidation solution where possible	Ensure in-contract documentation that all Southwark Council suppliers are required to use any implemented consolidation solution	100% of suppliers, that can use the approved freight consolidation solution, using it	NO ₂ , PM & CO ₂	Finance & Governance	Procurement	March 2019
4.5		All non-consolidation solution suppliers to the authority with a large fleet to join the Fleet Operator Recognition Scheme (FORS) and obtain Silver accreditation as a minimum	Within the contract documentation that all suppliers of large fleet are required to hold Silver accreditation of the Fleet Operator Recognition Scheme (FORS) or it be achieved within six months of the contract being signed, along with an ongoing commitment to use ULEV's	100% of all suppliers to the authority	NO ₂ , PM & CO ₂	Finance & Governance	Procurement	March 2019
4.6		To support sustainable logistical measures in the north of the Borough	Work with stakeholders to promote the combination and rationalisation of deliveries using low & zero emission vehicles and local distribution hubs for final stage delivery Explore-the feasibility of new technologies for smart deliveries	Increased % of commercial deliveries using low & zero emission vehicles	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy	March 2019
4.7		Reduce Southwark commercial fleet emissions	Switch to use of low or no emission vehicles	Every commercial vehicle procured to undergo full sustainability evaluation to determine suitability of low to determine suitability of low or no emission alternatives	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Fleet Services	March 2018 for current fleet renewal and ongoing for all relevant procurements thereafter
4.8			Produce mileage and efficiency guidance for services	Efficiency guidance produced and passed to all service drivers Mileage and fuel use reports provided to Business Unit Managers	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Fleet Services	December 2017

Section 4 – Reduce Emissions from Road Traffic

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
4.9	Reducing Emissions from Delivery and Servicing	Introduction of telematics on commercial fleet	Install telematics on commercial fleet	Telematics installed on 100% of fleet	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Fleet Services	March 2018
4.10		Smarter Driver Training for drivers of all Southwark fleets	Introduce Smarter Driver training requirement for all fleet drivers	All current staff to undertake Smarter Driver training.	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Fleet Services	December 2018
4.11				All new staff to receive the training within six months of commencement of their employment	PM & CO ₂	Environment & Social Regeneration	Fleet Services	December 2018 ongoing
4.12	Travel Planning	Maintain an up to date Council Travel Plan consistent with the aims of the air quality action plan	Undertake survey of staff travel arrangements	Survey bi-annually	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	2017 & 2019 & 2021
4.13			Review the Authority's Travel Plan	Review bi-annually	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	2018 & 2020 & 2022
4.14	Reducing emissions from Taxis & Private Hire Vehicles	Smarter Driver Training for drivers of all taxis and private hire vehicles	Ask the GLA & TfL introduce a requirement that all PCO licences include a Smarter Driver training element	Annual request submitted to GLA until all PCO licences include a Smarter Driver training element	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	April 2018 ongoing
4.15		Support the London Mayor's requirement that all newly licenced taxis be zero emission capable from 2018	Support TfL in the identification and installation of EV charging points	Appropriate EV charging infrastructure in place	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy	December 2017
4.16	Reducing vehicle emissions	Reduced emissions from buses in the borough	Work with TfL & GLA to deliver the low emission bus zones in Southwark	Increase percentage of bus routes using low emission vehicles year on year	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy	June 2017 ongoing
4.17		Work with TfL and other London Boroughs to extend the Ultra-Low Emission Zone (ULEZ) to the South Circular initially with a long term option to extend to the M25	Respond to all consultations and via any relevant forums on the ULEZ recommending the ULEZ be to the South Circular initially with a long term option to extend to the M25	All consultations submitted by deadline	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy & Environmental Protection	December 2022
4.18		Reduce fine particle emissions from tyre, brake and clutch components	Engage with appropriate researchers and industries to increase research to reduce fine particle emissions from tyre, brake and clutch components	2 approaches made per annum	PM	Environment & Social Regeneration	Environmental Protection	December 2017 ongoing
4.19	Emissions from vehicles	Vehicle idling awareness	Run public awareness campaign	Campaign in run-up to enforcement going live	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection, Street Wardens & External Affairs	April 2017

Section 4 – Reduce Emissions from Road Traffic

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
4.20	Emissions from vehicles	Enforcement of the provisions of the Road Traffic Act	Authorise street based enforcement staff	Train all JET officers, & Bankside Wardens in Road Traffic Act vehicle idling enforcement	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Joint Enforcement Teams & Bankside Wardens	June 2017
4.21		Enforcement of the provisions of the Road Traffic Act	Authorise street based staff to undertake enforcement	Explore the inclusion of vehicle idling enforcement into the current Parking Enforcement Contract	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Parking Services	July 2017
4.22	Emissions from vehicles	Enforcement of the provisions of the Road Traffic Act	Authorise street based staff to undertake enforcement	Authorise the Council's staff & Parking Enforcement Officers to issue PCN for vehicle idling offences	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Parking Services	September 2017
4.23		Variable vehicle parking charges to promote use of less polluting vehicles	Review the charges for on-street parking & permits	Report to Cabinet by December 2017	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Parking Services	December 2017
4.24	Emissions from vehicles	Variable vehicle parking charges to promote use of less polluting vehicles	Review the charges for Housing Estate parking permits	Report to Cabinet by December 2018	NO ₂ , PM & CO ₂	Housing & Modernisation	Residential Services	December 2018
4.25		Promote the reduction of total emissions to atmosphere	Public information campaign on alternative fuels for fleets/cars	1 campaign each year	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection, External Affairs, BIDS & the Business Forum	January 18 ongoing
4.26	Air quality around schools	Reduce parent & carer parking close to primary schools and nurseries	Pilot School Streets at 5 primary schools or nurseries	Produce a shortlist of primary schools or nurseries that meet the School Streets criteria	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	May 2017
4.27				Implement pilot at 5 primary schools or nurseries	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Sustainable Travel & Road Safety	December 2017
4.28		GLA Air Quality Audits for primary school/s	Air Quality Audit/s facilitated	Air Quality Audit/s complete	NO ₂ , PM & CO ₂	Children's & Adults Services	Education	December 2017
4.29			Identify funding to implement the Air Quality Audit recommendations	Implement the recommendations of the Air Quality Audits when funding is available and necessary permissions are obtained	NO ₂ , PM & CO ₂	Children's & Adults Services	Education	December 2019
4.30	Reduce private vehicles in the Borough	Promote the use of shared mobility in Southwark	Continue to promote & encourage shared mobility systems	Publicise, monitor and report on the new infrastructure and usage of mobility options	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy	December 2022

Section 5 – Reducing Carbon (extract from Authority’s Carbon Reduction Strategy)

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
5.1	Reduction of carbon emissions	Require developers to contribute to reducing atmospheric emissions	Achieve minimum 35% regulated carbon emissions reduction on Part L of 2013 Building Regulations on all new major developments	95% of relevant major planning applications meet policy target	PM & CO ₂	Chief Executive	Development Management	December 2018
5.2			Any of the 35% minimum CO ₂ reduction not achieved on-site to be secured through S106 for the “Green Fund” (carbon off-setting projects) for the equivalent remaining regulated carbon emission savings	100% of major planning applications not meeting the 35% minimum CO ₂ reduction on-site to address remaining emissions through off-setting funds secured through S106	PM & CO ₂	Chief Executive	Development Management	December 2018
5.3			New homes on all major developments to be zero carbon as per London Plan policy 5.2, achieved either on-site or via financial contributions for off-setting	100% of off-setting funds secured allocated to carbon off-setting projects	PM & CO ₂	Chief Executive	Development Management	December 2019
5.4		Require developers to contribute to reducing atmospheric emissions	All major developments to achieve Air Quality Neutral Standards onsite	100% of major developments to achieve Air Quality Neutral standards	NO ₂ , PM & CO ₂	Chief Executive	Development Management	December 2018
5.5			Where Air Quality Neutral standards not achieved on-site, off-setting funds secured through section 106 to ensure development meets the air quality neutral standard equivalent	100% of major planning applications not meeting the on-site Air Quality Neutral standard secure remaining requirement through off-setting funds through S106	NO ₂ , PM & CO ₂	Chief Executive	Development Management	December 2018
5.6			Commit and spend all off-setting funds on carbon off-setting projects	All funds secured for carbon off-setting purposes monitored and reported	PM & CO ₂	Chief Executive	Development Management	December 2018 ongoing
5.7	Improve the energy efficiency in Southwark homes	Promote reduced energy consumption and bills	Promote low cost energy efficiency measures	1 seasonal article per year promoting energy reduction measures	NO ₂ , PM & CO ₂	Housing & Modernisation	Major Projects & External Affairs	September 2017 ongoing
5.8		Maximise funding streams available to improve energy efficiency	Bid for funding where funding will be beneficial to energy efficiency and fit in with the overall council objectives	Report on funding received and utilised	NO ₂ & CO ₂	Housing & Modernisation	Major Projects	December 2018 ongoing

Section 5 – Reducing Carbon (extract from Authority’s Carbon Reduction Strategy)

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
5.9	Improve energy efficiency in Southwark homes	Install ultra-low NO _x boilers in council & TMO housing	Install ultra-low NO ₂ boilers when boilers are replaced in council and TMO housing	Install an average of 1600 ultra-low NO ₂ boilers/year	NO ₂ & CO ₂	Housing & Modernisation	Major Projects	December 2022
5.10		Develop & implement a strategy for communal boiler upgrades and renewals within council housing	Develop & implement the strategy for communal boiler upgrades and renewals	Strategy approved and subsequent progress against strategy targets reported	NO ₂ & CO ₂	Housing & Modernisation	Major Projects	December 2022
5.11		Monitor the effect of energy efficiency improvements in the Council’s social housing planned renewal programme	Implement monitoring regime for improvement programme in the social housing planned works programme	Develop baseline SAP score in 2017/18 and monitor the changes through the investment programme annually	NO ₂ & CO ₂	Housing & Modernisation	Major Projects	March 2018 ongoing
5.12	Promote the use of renewable energy and minimise the energy demand of Southwark estate	Reorganise the use of space in operational council buildings to reduce overall energy demand	Improve the use of Council buildings making them more sustainable, flexible, cost & space efficient	Baseline study in 2017/18 and monitor the change annually through the Modernise Strategy	NO ₂ & CO ₂	Chief Executive	Facilities Management	March 2018 ongoing
5.13		Be aware of the energy used and generated by the Authority’s operational buildings	Publish on-line information of the energy used and any generated by the Authority’s operational buildings	Web based information available to public	To inform policy	Environment & Social Regeneration	Service Development	December 2017
5.14	Promote the use of renewable energy and minimise the energy demand of Southwark Housing	Explore the opportunity to install renewable energy technologies in Southwark housing	Through extra funding, explore the opportunity of installing renewable energy technologies & energy efficiency measures and retrofitting insulation	Explore all available grant opportunities	NO ₂ , PM & CO ₂	Housing & Modernisation	Major Projects	December 2022
5.15			Explore options to set up community energy schemes on estates	Consider resident proposals for community energy schemes, subject to consultation and being cost effective	NO ₂ , PM & CO ₂	Housing & Modernisation	Major Projects	December 2018
5.16			Explore use of low energy alternatives and motion sensor systems to major repairs to lighting systems on estates	New lighting project on housing estates will be assessed using the best available technology to reduce energy use and taking into account the lifespan of the product and community safety issues	CO ₂	Housing & Modernisation	Major Projects	December 2019

Section 5 – Reducing Carbon (extract from Authority’s Carbon Reduction Strategy)

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
5.17	Ensure new developments minimise their impact on local air quality and climate change	Develop robust air quality planning policies	Develop robust air quality planning policies in the New Southwark Plan, Old Kent Road Area Action Plan & any new and revised Neighbourhood Plans	Adopt robust policies on air quality in all relevant planning policies	NO ₂ , PM & CO ₂	Chief Executive	Planning Policy	December 2017
5.18		Highlight design guidance for best practice in reducing emissions to air	Develop a revised Sustainable Design and Construction SPD that includes up to date guidance on improving air quality	Revised Sustainable Design and Construction SPD is adopted	NO ₂ , PM & CO ₂	Chief Executive	Planning Policy	December 2018
5.19	Increase number of Southwark Council Homes using renewable energy	Increase no. of Southwark Council Homes using renewable energy from SELCHP	Connect more dwellings to SELCHP	Increase no. of homes connected to SELCHP by 50%	NO ₂ , PM & CO ₂	Housing & Modernisation	Major Projects	December 2022

Section 6 – Regulation

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
6.1	Smoke Zone Control	Enforcement of the Clean Air Acts	Ensure that all retail premises selling wood and coal are aware that the whole of Southwark is a Smoke Control Area	An annual enforcement campaign	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	October 2017 ongoing
6.2		Discourage burning of logs and house coal	Undertake a communication campaign during the Autumn to highlight pollution caused by using non - smokeless fuels	Campaign each year until 2022	PM & CO ₂	Environment & Social Regeneration	Environmental Protection & External Affairs	October 2017 ongoing
6.3	Emissions from industrial premises know to emit emissions to air	Regulation of EPA Part B processes	All IPPC premises in the Borough inspected in accordance with their risk assessment	Annual inspection of 100% of all relevant premises	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	March 2017 ongoing
6.4	Green infrastructure	Increase the amount of green infrastructure	Explore all opportunities to install green infrastructure	Increase the quantity of green infrastructure in the Borough	NO ₂ & PM	Environment & Social Regeneration	Public Realm	December 2022
6.5	Healthy Streets	Assess the Borough's Highways against the criteria in TfL's Healthy Streets approach	Highway projects to be assessed against the TfL's Healthy Streets criteria	All new Highway projects proposed to be assessed against the TfL's Healthy Streets criteria	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Highway Projects	December 2022
6.6	Emissions from development	Emissions from construction minimised	Ensure that all strategic and major developments are aware of the Authority's Technical Guidance for Demolition & Construction	100% of all major & strategic planning application developers made aware	NO ₂ & PM	Environment & Social Regeneration	Environmental Protection	December 2017 ongoing
6.7	Emissions from construction equipment	Ensure all Non-Road Mobile Machinery (NRMM) complies with the GLA SPG construction criteria	Ensure that all strategic & major construction sites are on the on-line NRMM register	100% of all strategic and major construction sites registered on the on-line NRMM register	NO ₂ & PM	Environment & Social Regeneration	Environmental Protection	December 2018 ongoing
6.8			All strategic and major construction sites are inspected for NRMM compliance	100% compliance of all major & strategic construction sites	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	December 2018 ongoing

Section 6 – Regulation

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
6.9	Emissions from developments and premises	Enforcement of the provisions of the Environmental Protection and Clean Air Acts	Apply the provisions of Clean Air Act 1993 S.14 (chimney height.) to appropriate developments	To 100% of all relevant developments	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	December 2022
6.10			Investigate reports of bonfires & open burning	90% of all reports investigated	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Noise & Nuisance	December 2022
6.11	Emissions from waste management process	Enforcement of the Permit conditions at waste management sites in the Borough	Liaise with Environment Agency to ensure appropriate controls are being used to minimise and mitigate the creation of dust and fume at waste management sites	Review air quality management practices at waste management sites in the Borough	PM	External – Environment Agency	Environmental Protection	June 2018

Section 7 – Support the GLA Air Quality Aims

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
7.1	GLA Air Quality Focus Areas	Target the improvement of air quality in the GLA Air Quality Focus Areas	Ensure that local air quality is monitored in the GLA Air Quality Focus Areas	100% of the GLA Air Quality Focus Areas monitored for air quality	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	April 2018 ongoing
7.2				In Air Quality Focus Area 151 (Old Kent Road) explore a method of improving the traffic flow on the A2 in areas where congestion occurs.	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2017 ongoing
7.3				In Air Quality Focus Area 152 (Elephant & Castle) explore increasing green infrastructure in the public realm	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2017 ongoing
7.4				In Air Quality Focus Area 153 (London Bridge) explore working with the BID's to improve the energy efficiency of the commercial properties and increase green infrastructure	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2018 ongoing
7.5				In Air Quality Focus Area 154 (Lower Road) explore complimenting the L.B. Lewisham Construction Logistics Project and reviewing traffic flow in the Lower Road gyratory system	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection & Network Management	2018 ongoing
7.6				In Air Quality Focus Area 155 (Peckham Town Centre) explore reviewing the bus routes in the centre, increasing the number of low NO _x buses and improving the traffic flow on Peckham High Road	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection & Transport Policy	2019 ongoing
7.7				In Air Quality Focus Area 156 (Tower Bridge Road) explore implementing permanent anti-idling signage associated with the lifting of Tower Bridge	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection & Transport Policy	2019 ongoing
7.8				In Air Quality Focus Area 157 (Walworth Road / Camberwell Road / Camberwell Green) explore working with Southwark Highway Project Team to improve the traffic flow through the crossroads	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection, Transport Policy & Highways	2017 ongoing
7.9				In Air Quality Focus Areas 152, & 153 and 157 explore using geo-fencing for TfL buses to only use the bus in an electrical mode	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2019 ongoing

Section 7 – Support the GLA Air Quality Aims

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescale
7.10	GLA Air Quality Focus Areas	Target the improvement of air quality in the GLA Air Quality Focus Areas	Ensure that the implemented air quality projects in the GLA Air Quality Focus Areas are assessed	100% of projects assessed	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2021
7.11			Ensure that local air quality projects in the GLA Air Quality Focus Areas are comprehensively evaluated	100% of the projects produce an evaluation report at the end of the project period	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy & Environmental Protection	2021
7.12			Ensure that air quality projects implemented in the GLA Air Quality Focus Areas are regularly reviewed	All the implemented projects are reviewed annually	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2021
7.13	Cleaner Air Borough	Ensure full consideration of GLA air quality planning policy changes	Take all actions required by GLA to retain Cleaner Air Borough status	Cleaner Air Borough status retained	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2021
7.14	The extension of the ULEZ	Extension of ULEZ to include the whole borough & to be extended to the M25 as soon as practical	Respond to all GLA consultations expressing the Southwark policy stance	100 % of responses made within consultation period	NO ₂ , PM & CO ₂	Chief Executive	Transport Policy & Environmental Protection	2019
7.15	Support GLA planning policy with regard to air quality	Ensure full consideration of GLA planning policy changes that relate to air quality	Ensure GLA air quality policy is considered in all planning decisions	100% of all applications	NO ₂ , PM & CO ₂	Chief Executive	Development Management	2022
7.16	Mayor's Air Quality Fund	Identify projects suitable for Mayor's Air Quality funding	Review the Mayor's Air Quality funding guidance & apply for funds where possible	Apply for funding at each round of Mayor's Air Quality Fund made available	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	2022
7.17	Clean Air for Londoners	Work with the GLA & TfL and other organisations towards meeting the national air quality objectives	Review all external opportunities to participate in air quality improvement projects	Maximise any appropriate external opportunities to deliver local air quality improvement projects	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection, Public Health & Transport Policy	2022

Section 8 – Support Public Health Framework Objectives

Action Number	Theme / Aim	Objective	Action	Target	Expected emissions/ concentrations benefit	Directorate	Delivered by Lead Service Area / Team	Timescales
8.1	Joint Strategic Needs Assessment	The JSNA includes air quality and has up to date information on its health impacts	Produce an air quality section for the JSNA	JSNA air quality section ratified	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Public Health	June 2017
8.2			Review the air quality section of the JSNA annually	JSNA air quality section updated	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Public Health	June each year
8.3	Air Quality & Public Health	Retain local air quality as a public health priority	Provide up to date information in connection with air quality	Provide annual updates to Cabinet Member and Health & Well-being Board	NO ₂ , PM & CO ₂	Environment & Social Regeneration	Environmental Protection	May 2018 ongoing
8.4	Embed Air Quality Policy	Ensure that local air quality is considered within all relevant complementary council policy developments	All relevant new policies to incorporate air quality improvement objectives	All relevant new policies to incorporate air quality improvement objectives	NO ₂ , PM & CO ₂	Chief Executive	All relevant operational service areas	2022
8.5	Air Quality Alerts	Provide poor air quality alert information to Southwark Council staff caring for health vulnerable persons with particular emphasis on nurseries, primary schools and care homes	Devise a Poor Air Quality Alert internal cascade for staff working in nurseries, primary schools and care homes	Implement by September 2017	NO ₂ & PM	Environment and Social Regeneration	Environmental Protection & Public Health	September 2017

Technical Appendices

The appendices are in a separate document accessible on the Southwark website at www.southwark.gov.uk/airquality . Below is the list of technical appendices available.

Appendix 1 – Air Quality Objectives

Appendix 2 – Health Impacts of Air Pollution

Appendix 3 – Air Quality Monitoring & Modelling Results

Appendix 4 – Emission Sources / Source Apportionment

Appendix 5 – Glossary

Contact	Environmental Protection Team Regulatory Services 3 rd Floor, Hub 1 P.O. Box 64529 London SE1P 5LX
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Air Quality Strategy & Action Plan

Technical Appendices

March 2017

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Appendix 1 – National Air Quality Objectives

The air quality objectives applicable to the London are set out in the Air Quality (England) Regulations 2000 (SI 928), The Air Quality (England) (Amendment) Regulations 2002 (SI 3043), and are shown in Table 1. This table shows the objectives in units of micrograms per cubic metre $\mu\text{g.m}^{-3}$ (milligrams per cubic metre, mg.m^{-3} for carbon monoxide) with the number of exceedences in each year that are permitted (where applicable).

Table 1 Air Quality Objectives included in Regulations for the purpose of London Local Air Quality Management in London

Pollutant	Air Quality Objective		Date to be achieved by
	Concentration	Measured as	
Benzene	16.25 $\mu\text{g.m}^{-3}$	Running annual mean	31.12.2003
	5.00 $\mu\text{g.m}^{-3}$	Annual mean	31.12.2010
1,3-Butadiene	2.25 $\mu\text{g.m}^{-3}$	Running annual mean	31.12.2003
Carbon monoxide	10 mg.m^{-3}	Running 8-hour mean	31.12.2003
Lead	0.50 $\mu\text{g.m}^{-3}$	Annual mean	31.12.2004
	0.25 $\mu\text{g.m}^{-3}$	Annual mean	31.12.2008
Nitrogen dioxide	200 $\mu\text{g.m}^{-3}$ not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
	40 $\mu\text{g.m}^{-3}$	Annual mean	31.12.2005
Particulate Matter (PM ₁₀) (gravimetric)	50 $\mu\text{g.m}^{-3}$, not to be exceeded more than 35 times a year	24-hour mean	31.12.2004
	40 $\mu\text{g.m}^{-3}$	Annual mean	31.12.2004
Sulphur dioxide	350 $\mu\text{g.m}^{-3}$, not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
	125 $\mu\text{g.m}^{-3}$, not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
	266 $\mu\text{g.m}^{-3}$, not to be exceeded more than 35 times a year	15-minute mean	31.12.2005

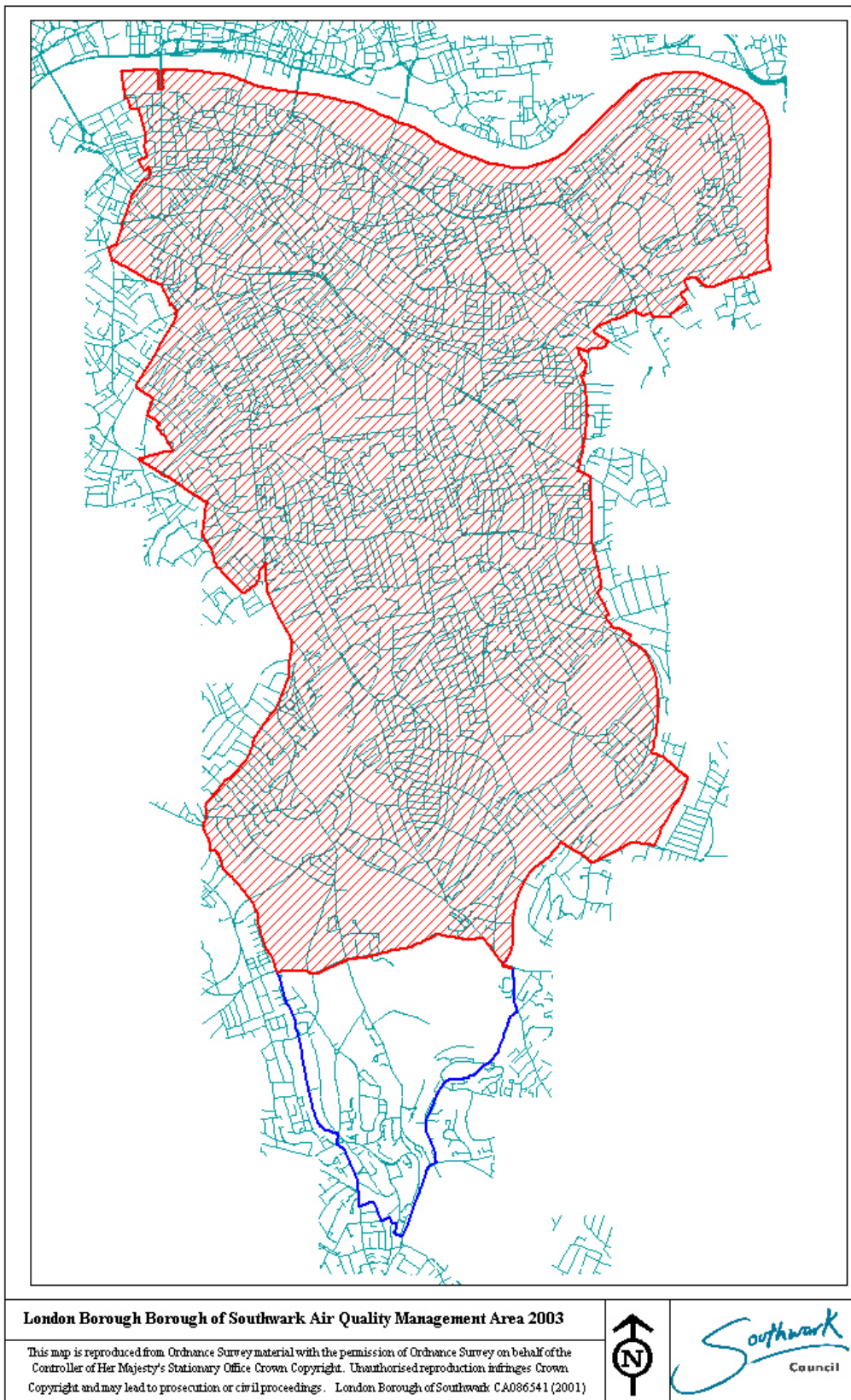


Figure 1 Map of Air Quality Management Area in the L.B. Southwark

Appendix 2 – Health Impacts of Air Pollution

Introduction

The health impacts of air pollution are varied, ranging from coughing, worsening of asthma, changes in lung function, increased hospital admissions for respiratory and cardiovascular disease and death.

Meta-analysis of several studies provides the evidence of a statistically significant effect. This meta-analysis also provides an estimate of the magnitude of the effect. The results are usually expressed as a proportional increase in effects for a $10\mu\text{g.m}^{-3}$ change in exposure. For an example, the overall increase in all-cause deaths from an increase in exposure to $\text{PM}_{2.5}$ is 6% per $10\mu\text{g.m}^{-3}$ change in the annual mean concentration.

In March 2015 the Committee on the Medical Effects of Air Pollutants concluded there is evidence of associations of ambient concentrations of NO_2 with a range of effects on health. Studies have shown that to some extent, NO_2 acts as a marker of the effects of other traffic-related pollutants. The epidemiological and mechanistic evidence now suggests that it would be sensible to regard NO_2 as causing some of the health impact found to be associated with it in epidemiological studies.

In July 2015 King's College London calculated that the total mortality burden of long-term exposure to NO_2 is estimated to be up to 88,113 life-years lost, equivalent to 5,879 deaths at typical ages (assuming the WHO value of up to a 30% overlap between the effects of $\text{PM}_{2.5}$ and NO_2). Some of this effect may be due to other traffic pollutants. The total mortality burden of anthropogenic $\text{PM}_{2.5}$ for the year 2010 is estimated to be 52,630 life-years lost, equivalent to 3,537 deaths at typical ages. The total mortality burden in 2010 from $\text{PM}_{2.5}$ and NO_2 can be added to give a range from the 52,630 life-years lost, equivalent to 3,537 deaths at typical ages from $\text{PM}_{2.5}$ alone (if only including the most established effects) to as much as 140,743 life-years lost, equivalent to 9,416 deaths at typical ages (assuming a 30% overlap between the effects of $\text{PM}_{2.5}$ and NO_2 and comparing with a zero concentration of NO_2).

A study in East London¹ found that traffic-related air pollutants have adverse effects on respiratory and allergic symptoms in school children in the area. This study also demonstrated that was a reduction of lung Forced Vital Capacity with increased exposure to traffic derived pollutants.

¹ Wood HE, Marlin N, Mudway IS, Bremner SA, Cross L, Dundas I, et al. (2015) Effects of air pollution and the introduction of the Low Emission Zone on prevalence of respiratory and allergic symptoms in schoolchildren in east London: A Sequential Cross – Sectional Study. Plos One 10(8): e0109121. Doi 10.1371/journal.pone.0109121

The table below shows the summary of the sources and impact of pollutants found in an urban area.

Pollutant	Sources	Health effects
Nitrogen dioxide	Road transport (especially diesel vehicles), domestic boilers, power stations and industry	Lung irritation and damage
Sulphur dioxide	Power stations, domestic boilers, industry	Coughing, irritation and narrowing of airways. Can make asthma and bronchitis worse
Fine Particulates (PM ₁₀ and PM _{2.5})	Road transport (mainly diesel vehicles and tyre and break wears), power stations, domestic boilers	Increased chances of respiratory disease, lung damage, cancer and premature death
Ozone	Produced when sunlight reacts with vehicle exhaust fumes	Irritation to eyes, nose and throat. Can damage lungs and airways

Appendix 3 – Air Monitoring & Modelling Results

Introduction

This section presents the historical and up to date data from the continuous monitoring stations within the Southwark area for Nitrogen Dioxide (NO₂) and Particulate matter (PM₁₀). The Authority does not present monitor for PM_{2.5} so the average data for all of the London sites has been presented.

After the monitoring data section, there are the modelling annual means for NO₂, PM₁₀ & PM_{2.5} concentrations for the Greater London Area in 2013 maps. The following maps show the modelled annual mean concentrations for 2013 for the Borough.

The final part of this appendix outlines the GLA focus areas in the Greater London and in the Southwark and the areas which are on the border of the borough.

Nitrogen Dioxide (NO₂)

Site ID	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2015 % ^b	Annual Mean Concentration (µg.m ⁻³)						
				2009	2010	2011	2012	2013	2014	2015
SWK1 ²	Urban Background	N / A	N / A	49 (44%)	N / A	N / A	N / A	N / A	N / A	N / A
SWK5	Roadside	69	69	N / A	N / A	46 (73%)	52 (80%)	55 (>90%)	38 (32%)	42 (69%)
SWK6	Urban Background	80	80	N / A	N / A	N / A	N / A	42 (85%)	37 (84%)	41(80%)
CP1 ³	Roadside	N / A	N / A	49 (93%)	47 (56%)	N / A	N / A	N / A	N / A	N / A

Table 2 Annual Mean NO₂ Ratified and Bias-adjusted Monitoring Results (µg.m⁻³)

Notes: Exceedence of the NO₂ annual mean AQO of 40µg.m⁻³ are shown in **bold**.

NO₂ annual means in excess of 60µg m⁻³, indicating a potential exceedence of the NO₂ hourly mean AQS objective are shown in bold and underlined.

The above data shows that at both stations, that the annual mean concentrations is exceeding the objective of 40µg.m⁻³ since 2011. The trends for the monitoring stations in the Southwark area can be seen in Figure 2 below.

² This air quality monitoring station was situated at Larcom Street, the station closed in June 2009, due to the council building being disposed of.

³ This air quality monitoring station was installed by a collaboration of Local Authorities (L.B. Bromley, L.B. Croydon L.B. Lambeth, L.B. Lewisham and L.B. Southwark). This station was closed in July 2010 due to the reduction/reallocation of resources by the involved Local Authorities.

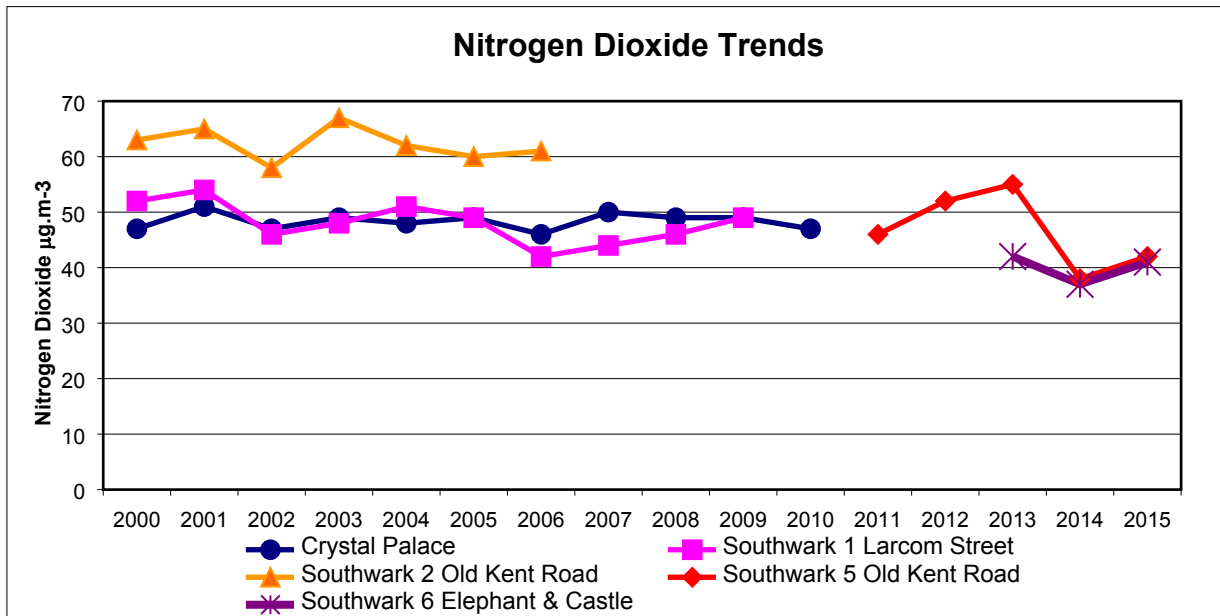


Figure 2 Trends in Annual Mean NO₂ Concentrations at the Borough’s Automatic Monitoring Sites

Figure 3 below shows the mean results from all roadside and background monitoring stations within the London Air Quality Network⁴. This shows that the trend for the background sites is showing a gradual reduction to below the objective. However the roadside locations are not reducing and exceed the objective in the region of 7µg.m⁻³ to 20µg.m⁻³.

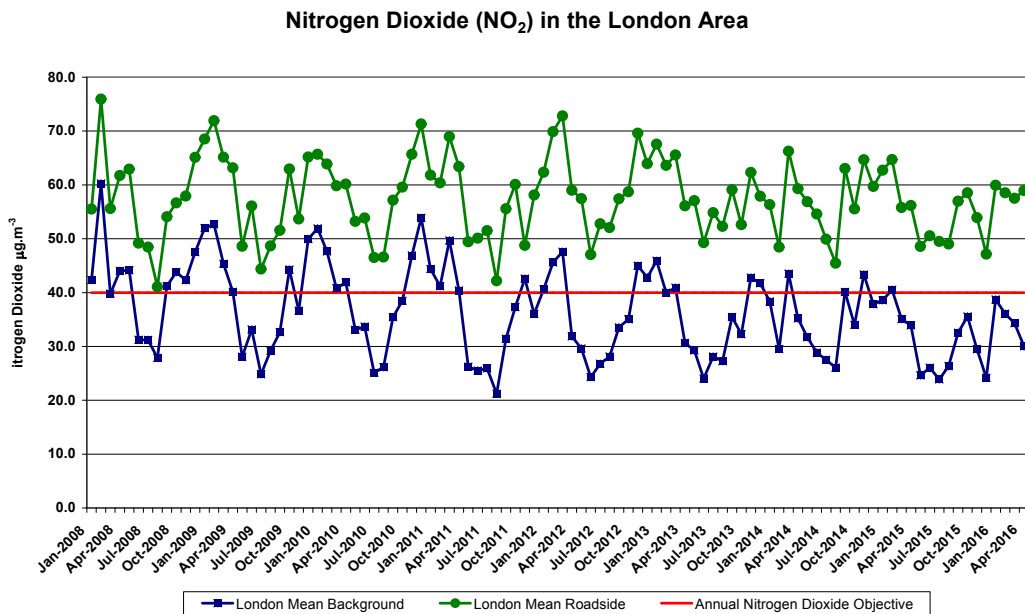


Figure 3 Trends of the monthly mean Nitrogen Dioxide concentrations at roadside and background sites in the London area

⁴ London Datastore - London Average Air Quality Levels accessed at <http://data.london.gov.uk/dataset/london-average-air-quality-levels>

Particulate Matter (PM₁₀)

Table 3 Annual Mean PM₁₀ Automatic Monitoring Results (µg m⁻³)

Site ID	Valid data capture for monitoring period %	Valid data capture 2015 %	Annual Mean Concentration (µg.m ⁻³)						
			2009	2010	2011	2012	2013	2014	2015
SWK1	N / A	N / A	22 (44%)	N / A	N / A	N / A	N / A	N / A	N / A
SWK5	60	60	N / A	29 (8%)	27 (80%)	25 (82%)	30 (85%)	23	21
SWK6	77	77	N / A	N / A	N / A	N / A	23 (80%)	19	20
CP1	N / A	N / A	24(80%)	23 (55%)	N / A	N / A	N / A	N / A	N / A

Notes: Exceedence of the PM₁₀ annual mean AQO of 40µg.m⁻³ are shown in **bold**.

The PM₁₀ annual mean concentrations at the monitoring stations have met the national air quality objectives. The downward trends of the PM₁₀ annual mean concentrations at the monitoring stations is shown in Figure 4 The trends for all the London Air Quality Network roadside and background monitoring stations can be seen in Figure 5 this shows that the concentrations are generally below the objective level.

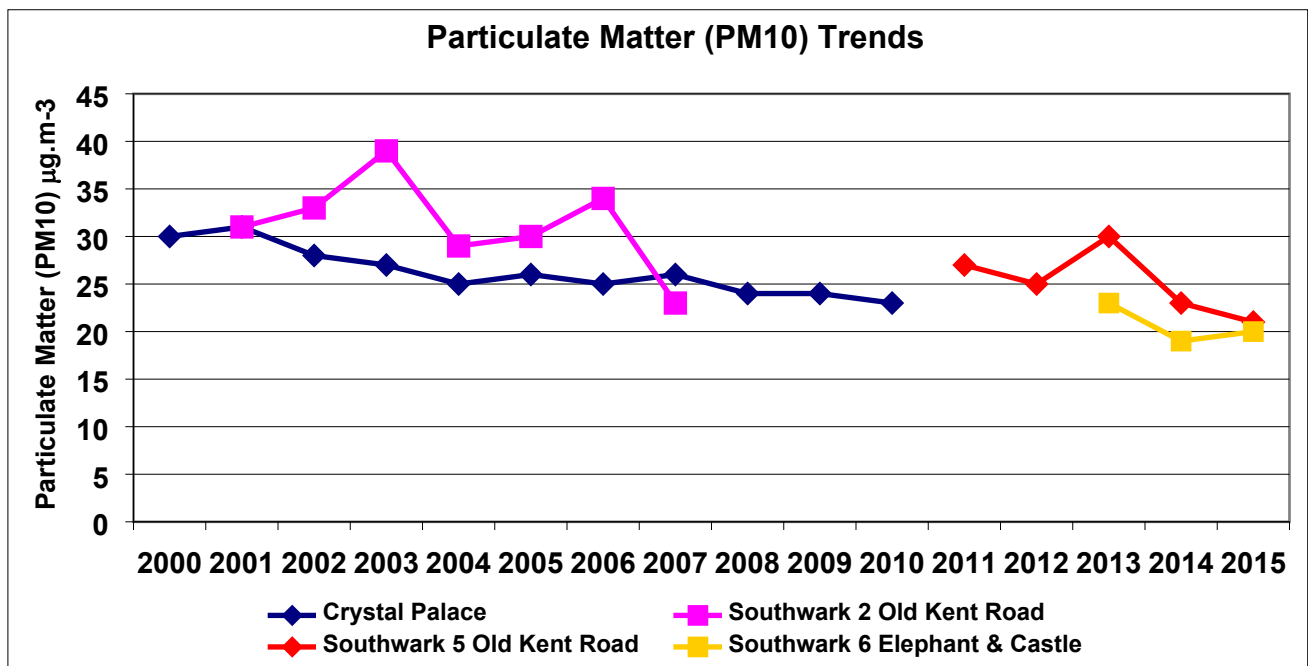


Figure 4 Trends in Annual Mean PM₁₀ Concentrations of the Authority's PM₁₀ monitoring stations

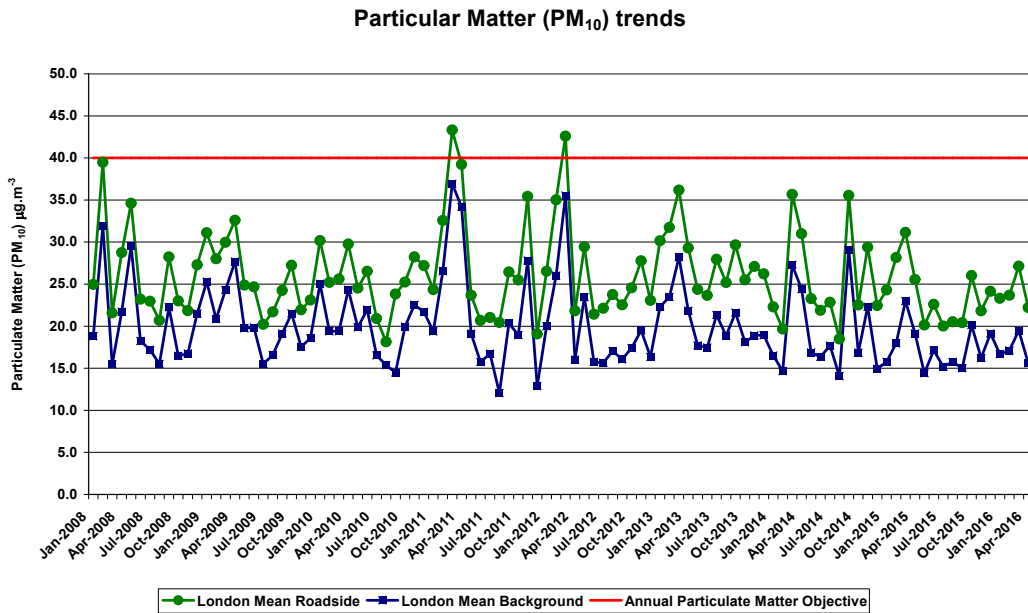


Figure 5 Trends of the monthly mean Particulate Matter (PM10) concentrations at roadside and background sites in the London area.

Particulate Matter (PM_{2.5})

The London Borough of Southwark does not monitor for PM_{2.5} in the Borough. Figure 6 shows the concentrations of all the PM_{2.5} roadside and background monitors in the London Air Quality Network. There appears to be a downward trend of the concentrations.

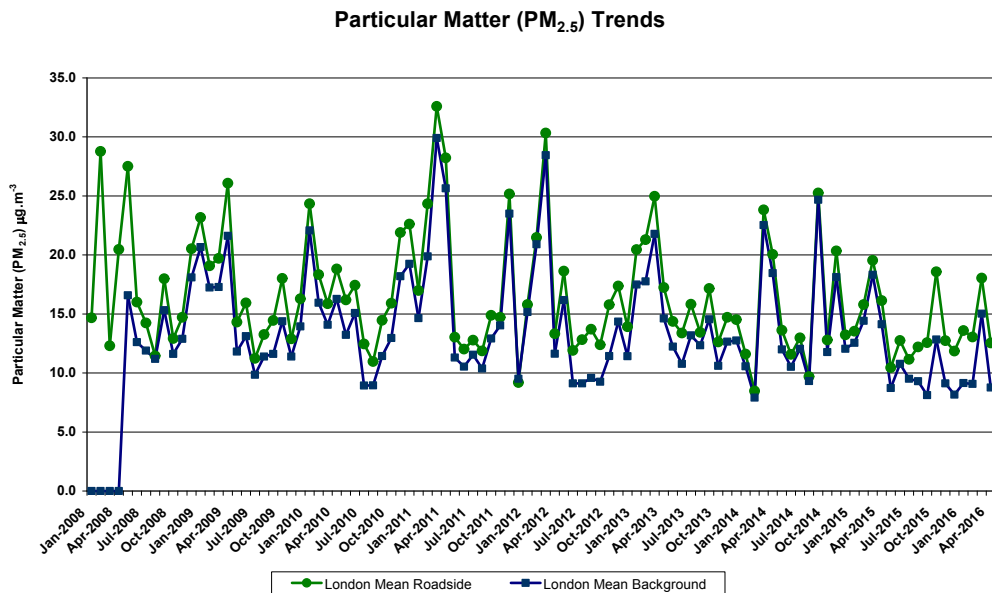


Figure 6 Trends of the monthly mean Particulate Matter (PM_{2.5}) concentrations at roadside and background sites in the London area.

Source GLA accessed at <http://data.london.gov.uk/dataset/london-average-air-quality-levels>

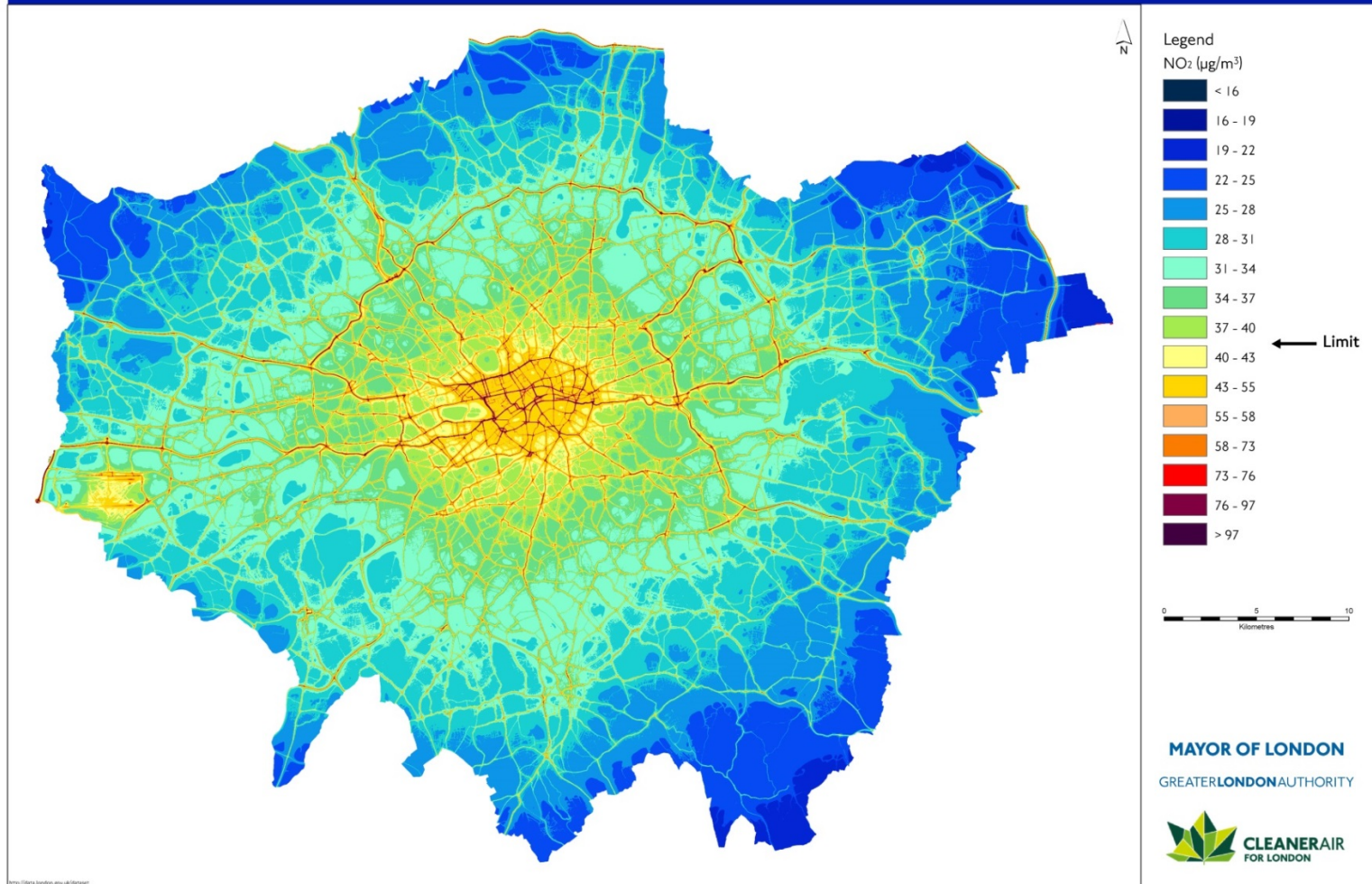


Figure 7 Greater London – Annual Mean NO₂ concentrations 2013

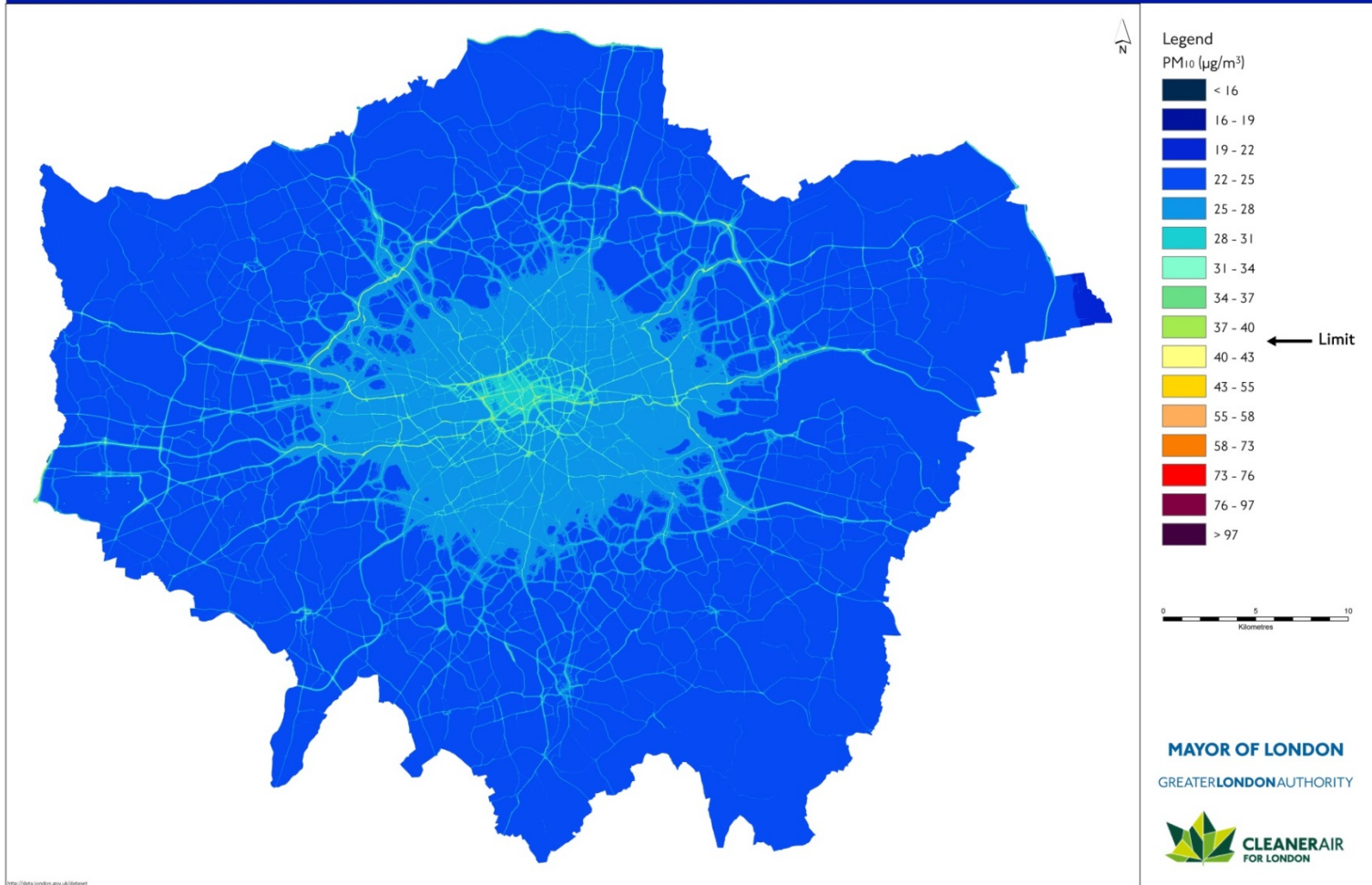


Figure 8 Greater London – Annual Mean PM₁₀ concentrations 2013

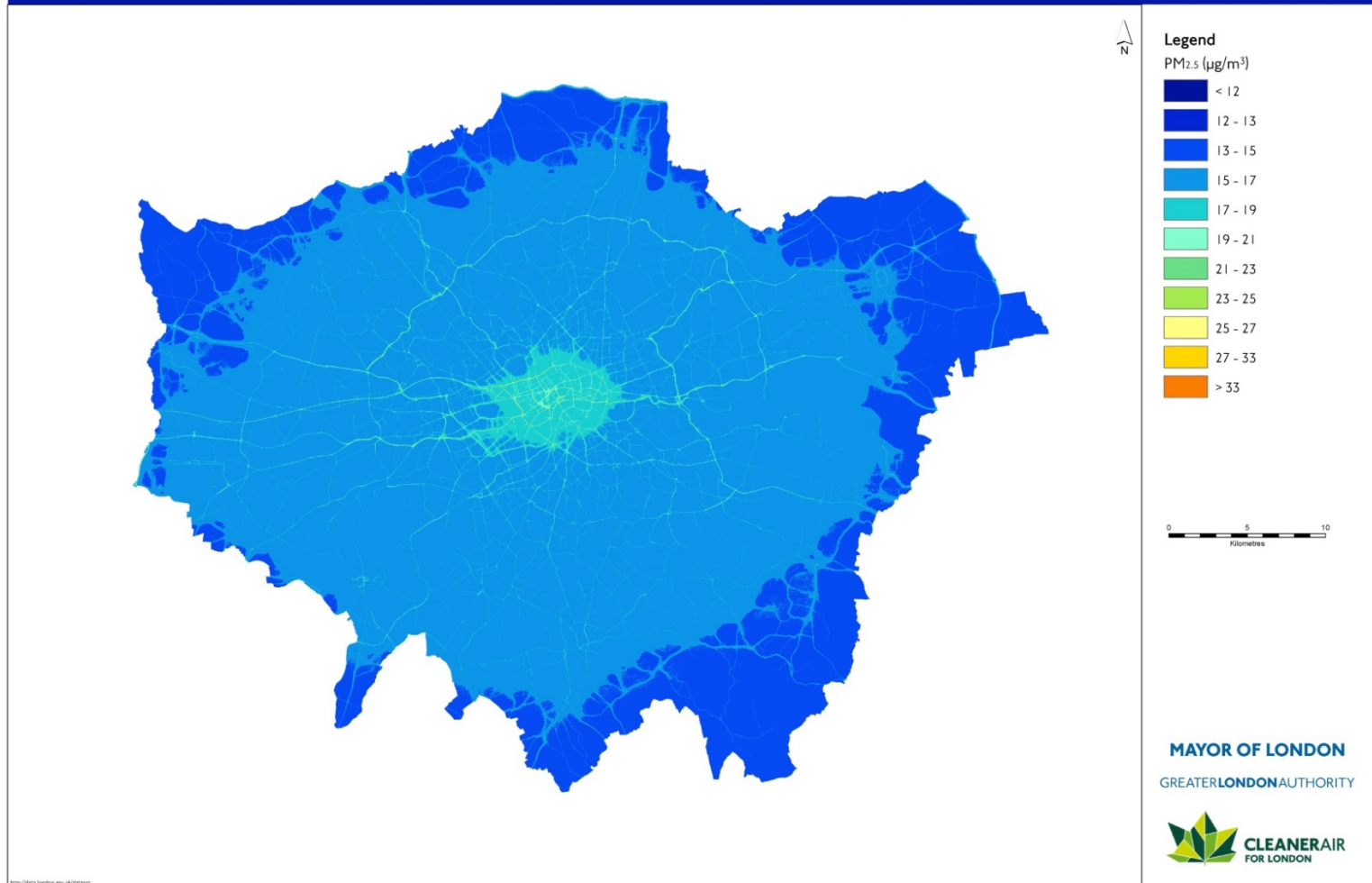


Figure 9 Greater London – Annual Mean PM_{2.5} concentrations 2013

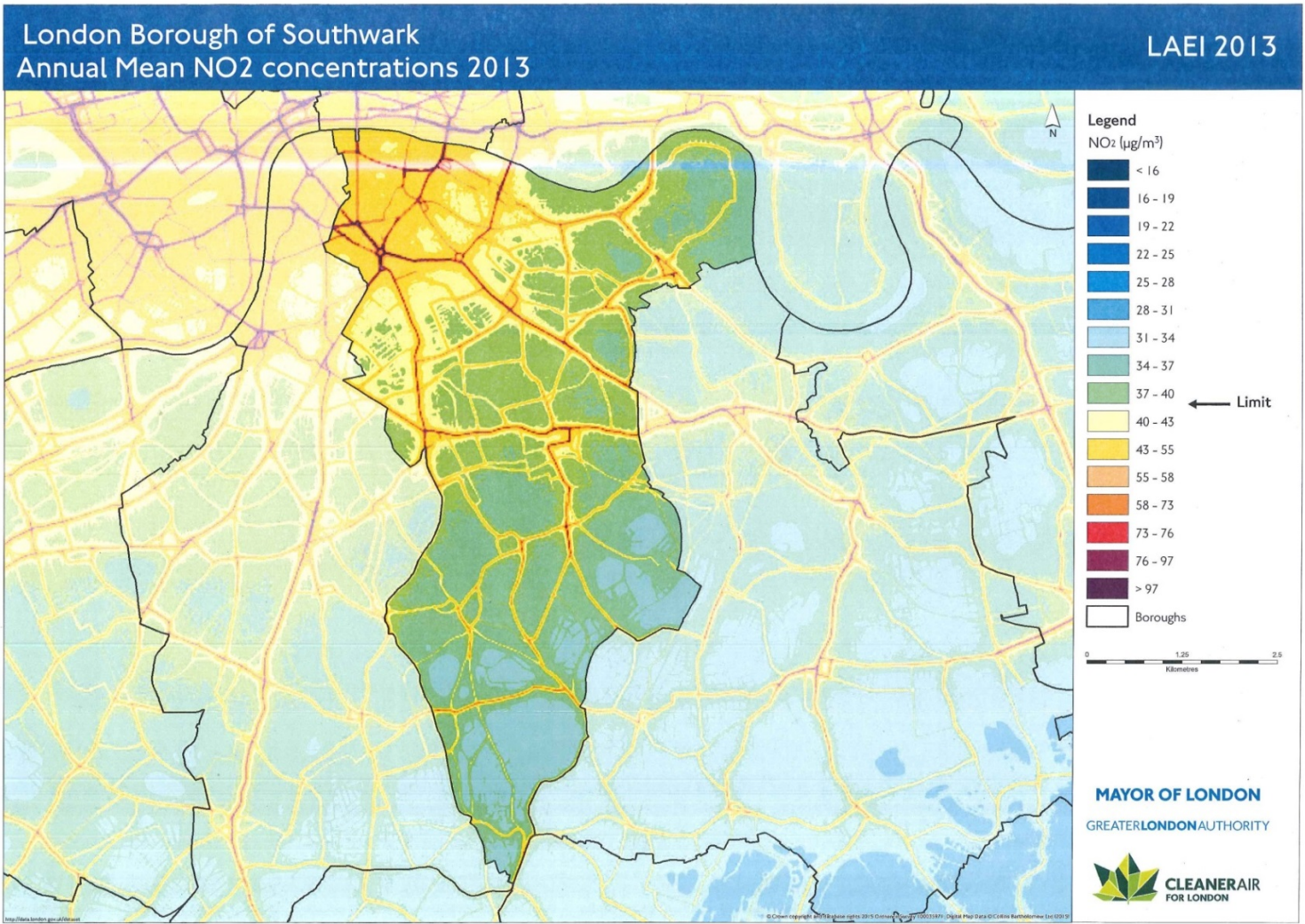


Figure 10 L.B. Southwark– Annual Mean NO₂ concentrations 2013

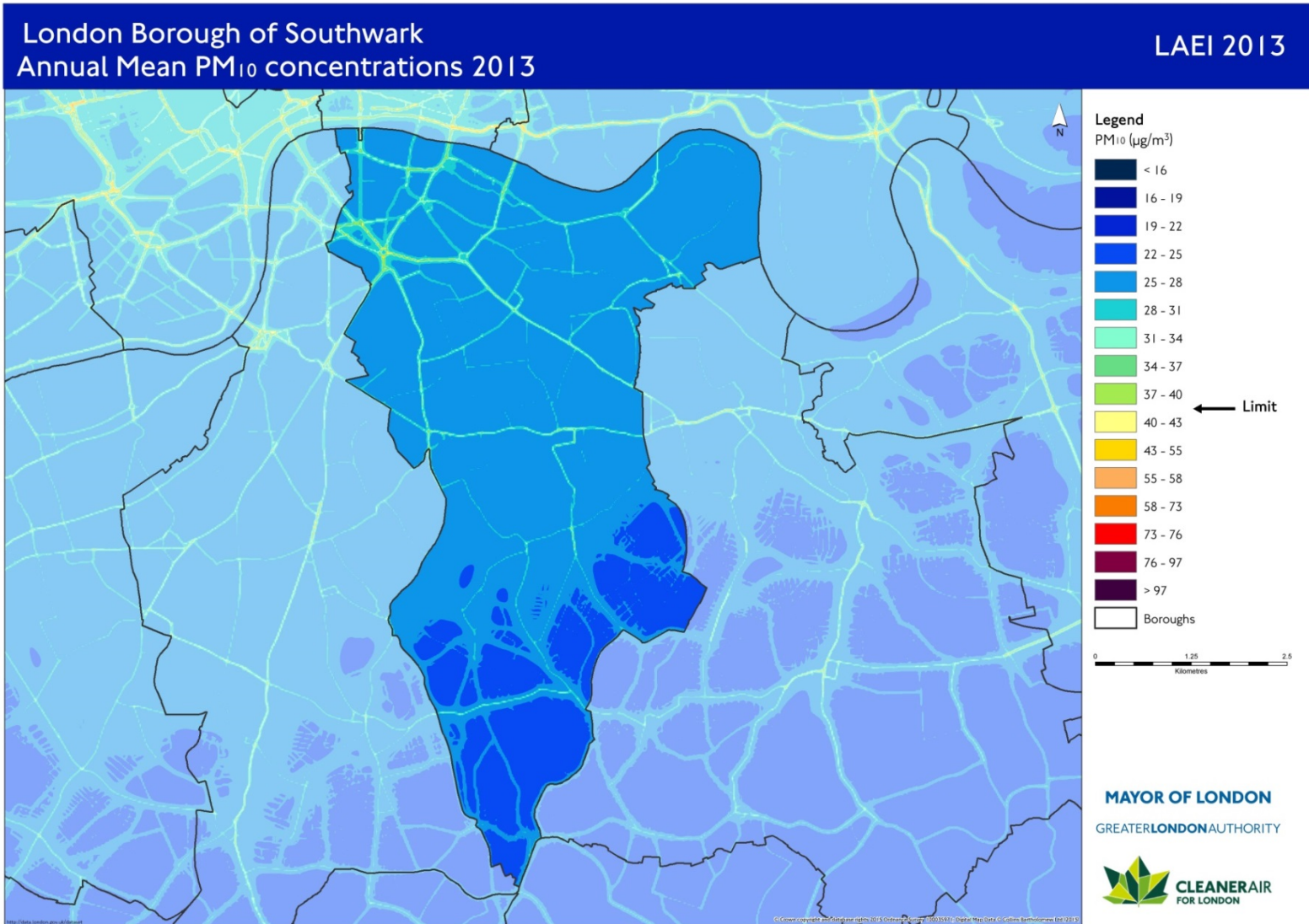


Figure 11 L.B. Southwark– Annual Mean PM₁₀ concentrations 2013

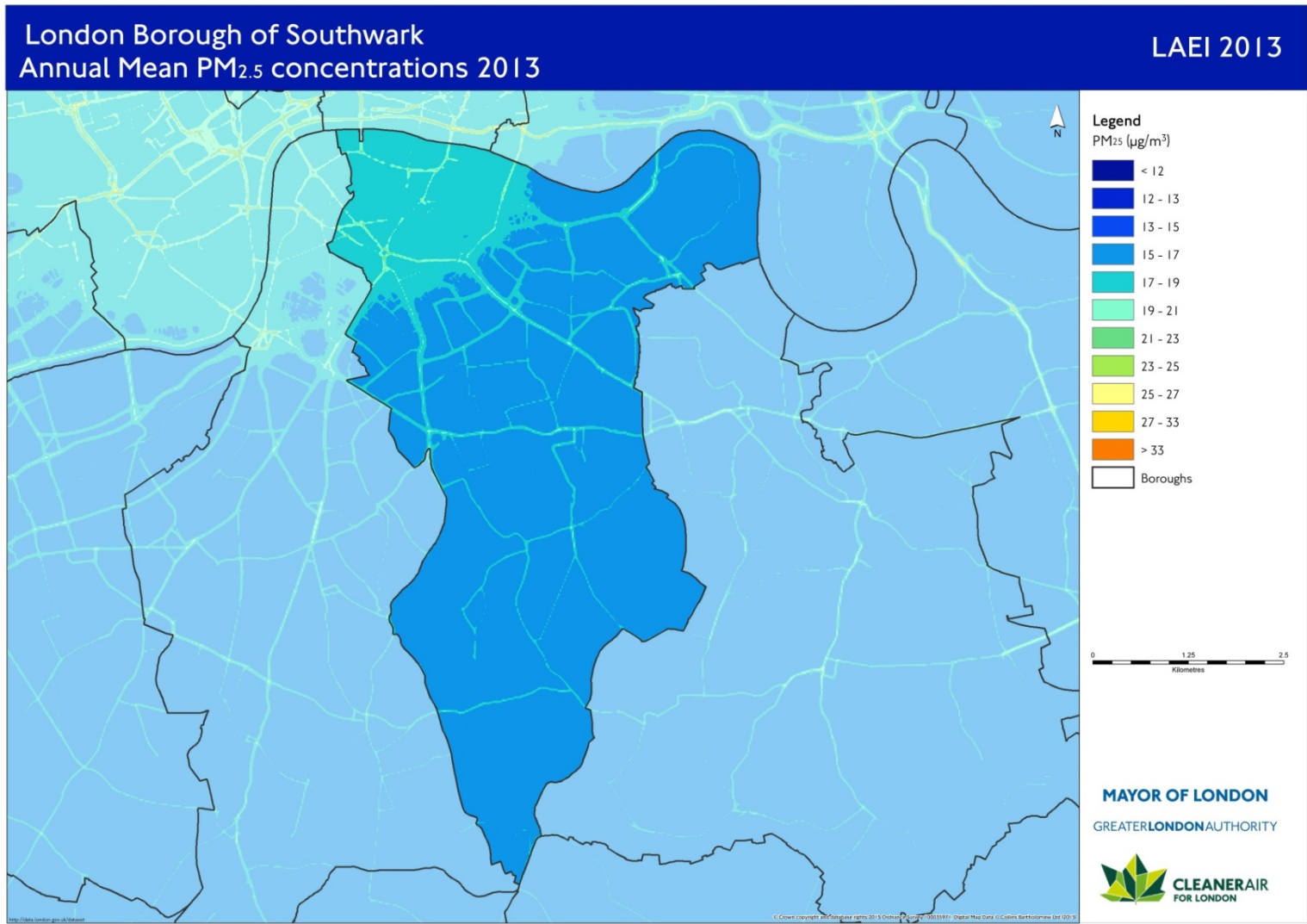
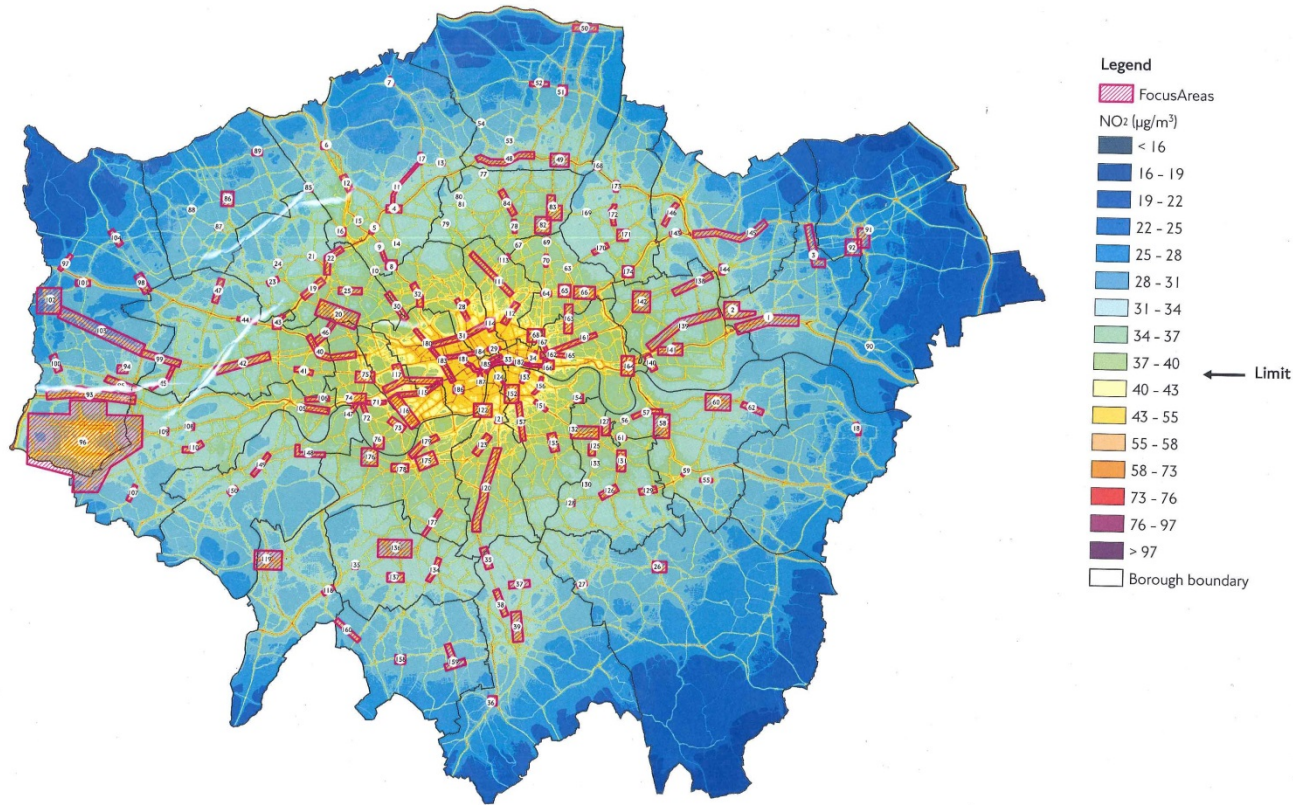


Figure 12 L.B. Southwark– Annual Mean PM_{2.5} concentrations 2013

NO₂ Focus Areas LAEI 2013



London Atmospheric Emissions Inventory (2013)

Figure 13 NO₂ Focus Areas LAEI 2013

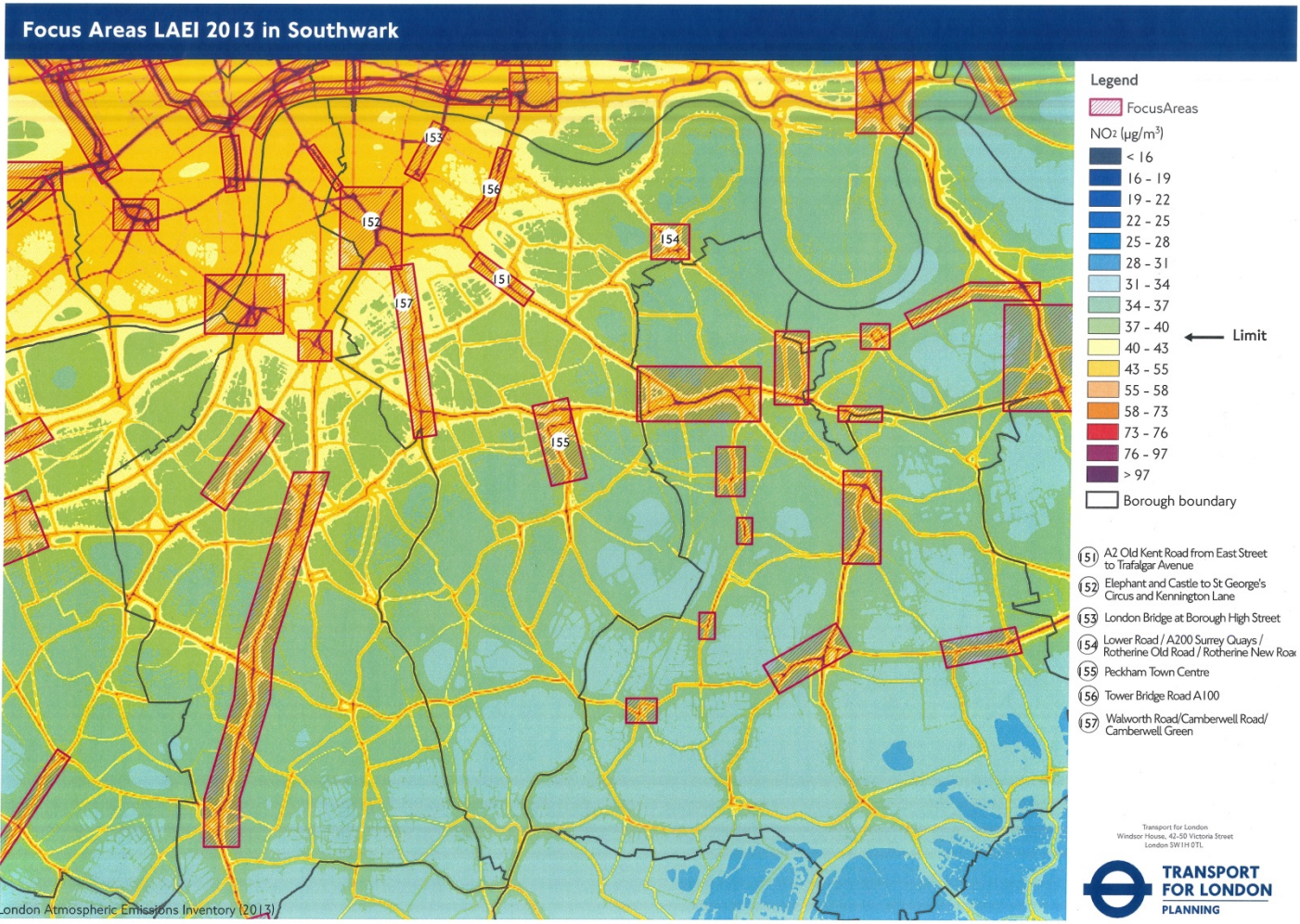


Figure 14 NO₂ Focus Areas LAEI 2013 in Southwark

Air Quality Focus Areas for the Greater London Area.

The London Mayor has introduced a number of Air Quality Focus Areas⁵ in the Greater London area. Figure 13 shows the Air Quality Focus Areas for the Greater London Area. Figure 14 shows the Air Quality Focus Areas in the Borough and neighbouring Boroughs. The process of how the Mayor of London developed these focus areas can be found [here](#)

Table 4 and Table 5 give descriptions of the air quality focus areas in the borough and the air quality focus areas adjacent to borough's Boundary. Within the borough the following areas have been designated Air Quality Focus Areas by the GLA.

Each of the Air Quality Focus Areas in Southwark has a dedicated action to improve air quality in the revised action plan, see actions 7.2 to 7.12.

Table 4 Air Quality Focus Areas in the London Borough of Southwark

ID	Description of the Air Quality Focus Area
151	A2 Old Kent Road from East Street to Trafalgar Avenue
152	Elephant and Castle to St George's Circus and Kennington Lane
153	London Bridge at Borough High Street
154	Lower Road / A200 Surrey Quays/ Rotherhithe Old Road / Rotherhithe New Road
155	Peckham Town Centre
156	Tower Bridge Road A100
157	Walworth Road / Camberwell Road / Camberwell Green

Table 5 Air Quality Focus Areas in the adjacent boroughs

ID	Local Authority	Description of the Air Quality Focus Area
33	City of London	Farringdon Road and New Bridge Street at Blackfriars
34	City of London	Monument / Gracechurch Street / Bishopsgate to
121	Lambeth	Kennington Oval and Camberwell New Road
124	Lambeth	Waterloo Road
125	Lewisham	Brockley Cross
128	Lewisham	Forest Hill and Perry Vale Junction
130	Lewisham	Honor Oak Park junction Brockley Road
132	Lewisham	New Cross Gate and New Cross
133	Lewisham	Brockley Road (A218) between Adelaide Road and Wickham Road
166	Tower Hamlets	Tower Hill / Tower Gateway / Cable St / The Highway
182	City of Westminster	Embankment Charing Cross to Tower Hill

⁵ GLA (2013) Air Quality Focus Areas data accessed at <http://data.london.gov.uk/dataset/air-quality-focus-areas>

Appendix 4 – Emission Sources

Introduction

The GLA has produced the London Atmosphere Emissions Inventory (LAEI) for over a decade, the latest version was published in March 2016. The LAEI 2013 provides estimates in the Greater London area emissions for NO₂, PM₁₀, PM_{2.5} & CO₂ for the base year 2013 and forward projections for 2020, 2025 and 2030.

The LAEI can be downloaded from the [GLA Datastore](#). The LAEI 2013 provides the following data.

- Supporting Information
- Grid Emissions Summary (in Excel, MapInfo and Arc GISformat)
- Detailed Road Transport (in Excel, MapInfo and Arc GISformat)
- Modelled Concentrations for the three pollutants for all the years.
- Presentations Slides of the GLA LAEI 2013 Workshop on 14/04/2016.

With the LAEI 2013 data, the GLA has provided [bespoke Borough by Borough information](#) which utilises the information contained in the LAEI 2013. The information provides the concentration maps for 2013 and 2020 for NO₂, PM₁₀ & PM_{2.5} for all the London Boroughs and Excel Tools. The [Excel Tools](#) included a Source Apportionment Tool, the following pie charts show the source apportionment for NO_x, PM₁₀ & PM_{2.5} emissions in 2013 for the London Borough of Southwark. Within the source apportionment tool, the emissions can be calculated for each 1km grid square within the borough.

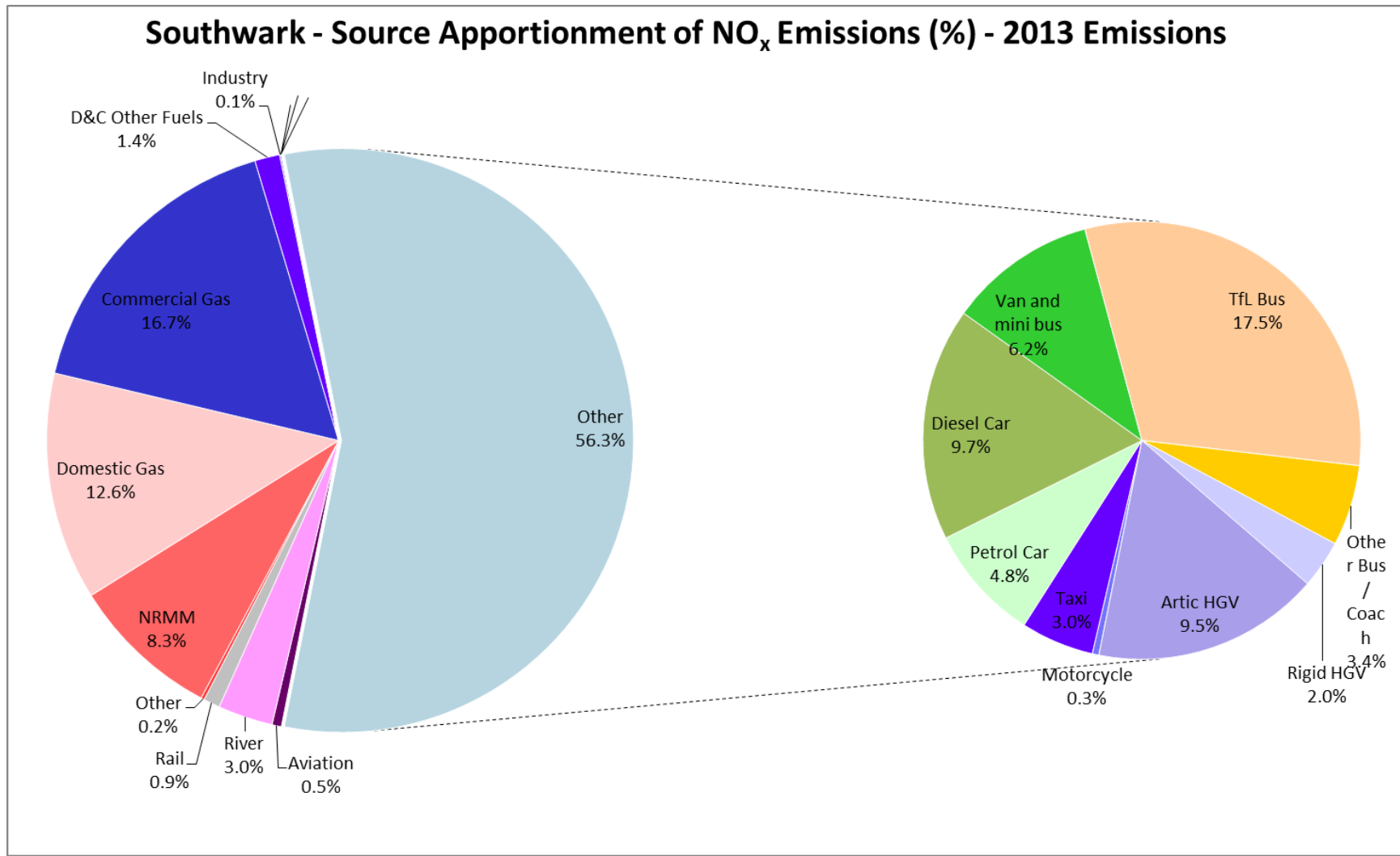


Figure 15 Southwark – Source Apportionment of NO₂ Emissions (%) - 2013 Emissions

Southwark - Source Apportionment of PM₁₀ Emissions (%) - 2013 Emissions

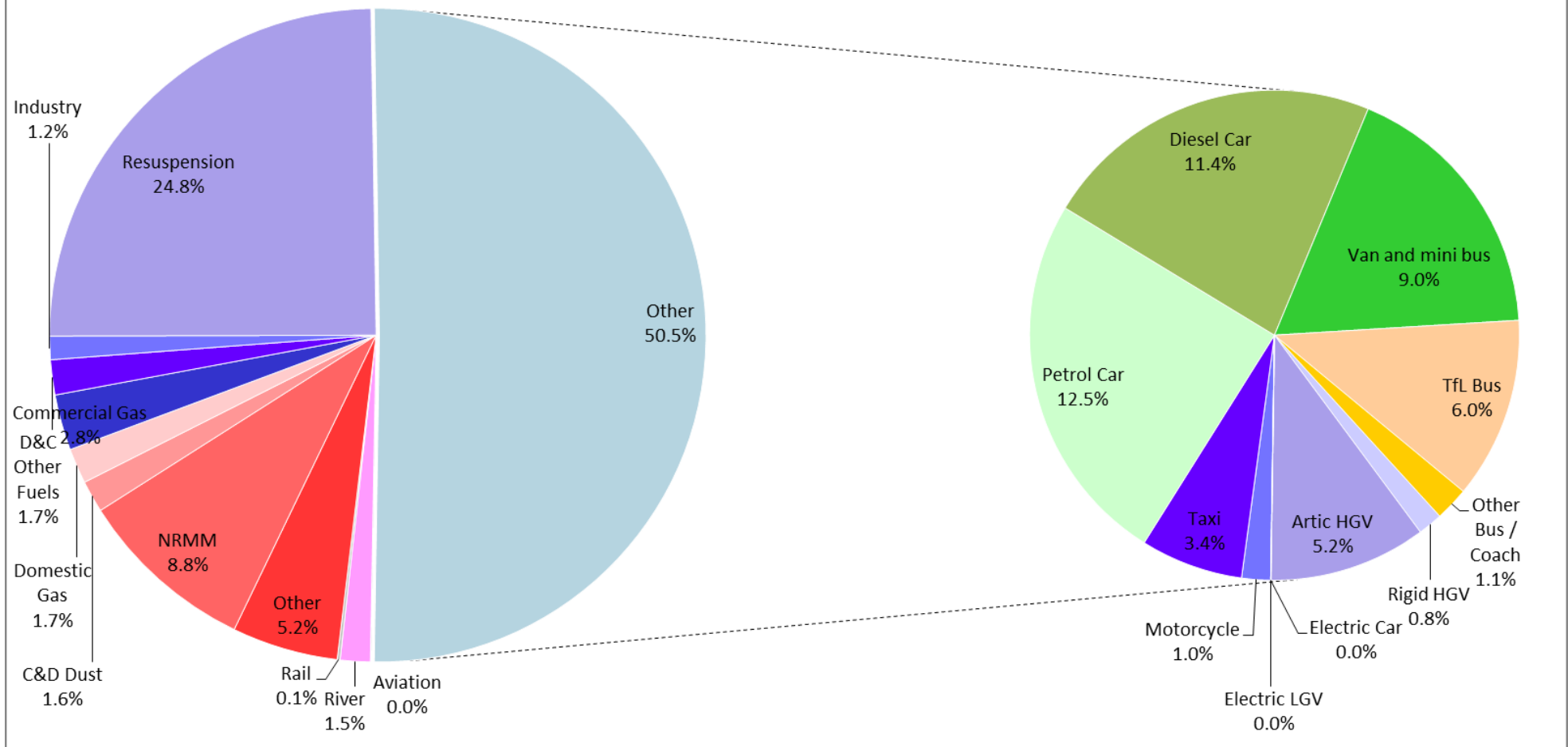


Figure 16 Southwark – Source Apportionment of PM₁₀ Emissions (%) - 2013 Emissions

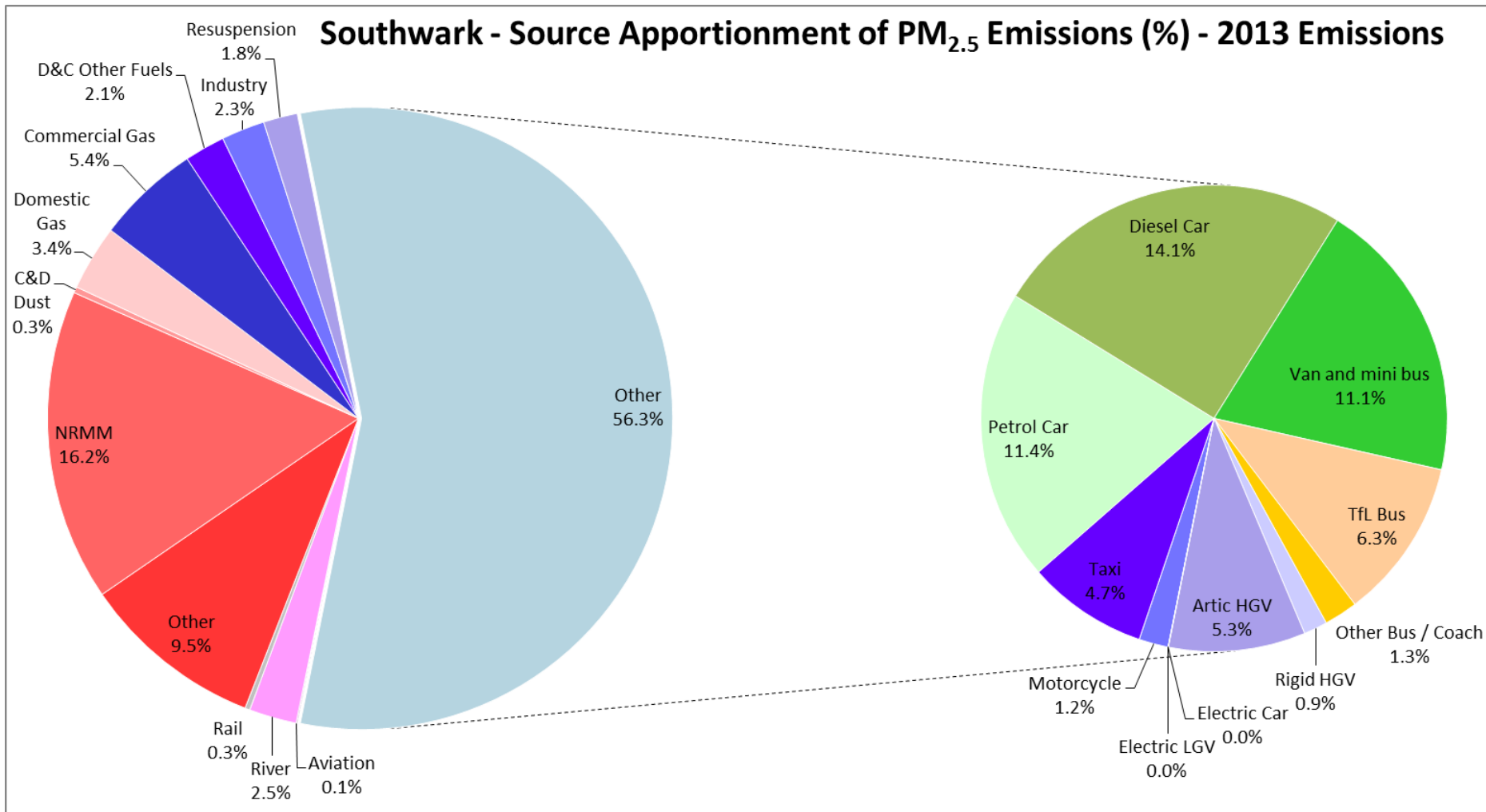


Figure 17 Southwark – Source Apportionment of PM_{2.5} Emissions (%) - 2013 Emissions

Appendix 5 - Glossary

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non-Road Mobile Machinery
PM ₁₀	Particulate matter less than 10 micron in diameter
PM _{2.5}	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London

Notes



Air Quality Strategy & Action Plan

Consultation Responses

March 2017

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Consultation Overview

There were 3 main groups of consultees during the development of the Air Quality Strategy & Action Plan these were:-

- Internal services who will deliver the actions
- Statutory consultees – required by legislation
- The public – due to significant public interest in local air quality

Internal service areas

The draft consultation version of the current document had internal consultation from the action plan delivery service areas as it was being developed. The service areas were consulted again on the post-consultation final draft and all their comments and queries regarding content addressed.

This included the following teams:

- Environmental Protection
- Environment & Leisure Service Development
- Comms
- Public Health
- Transport Policy
- Sustainable Travel & Road Safety
- Procurement
- Facilities Management
- Fleet Services
- Housing Major Projects
- Development Management
- Planning Policy
- Noise & Nuisance
- Joint Enforcement

Statutory Consultees

It is a legal duty under Environment Act 1995 and the London Local Air Quality Management Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following parties were contacted directly by email.

- The Secretary of State/Defra – to ensure that the council's air quality strategy will dovetail with the national air quality strategy
- The Environment Agency – as they are also involved in emissions control and regulating polluting processes
- The Mayor of London – they must approve the London Local Authorities Air Quality Action Plans prior to publication

- Transport for London – who provide a joint response with the Mayor of London
- All neighbouring boroughs – To ensure any actions proposed by one authority do not compromise but compliment actions proposed by the other
- Other public authorities as the borough considers appropriate – the Health & Wellbeing Board, the Clinical Commissioning Group and organisations representing local business interests were consulted – the local BIDs consulted included Better Bankside, Team London Bridge, We Are Waterloo, The Blue and South Bank. We also consulted Southwark Commerce

The Public

Using the Southwark Council Consultation Hub, supported by Facebook posts and items on the council's Twitter feed to raise awareness, the public were asked to give us their comments on the Draft Air Quality Strategy and Action Plan. This consultation ran from the 15th December 2016 – 31st January 2017.

The results of the consultation - Overview

Organisation/Agency/Party	Response
Defra	No
Mayor of London /GLA	Yes – see part A
Environment Agency	Yes – see part A
TfL	No
Lambeth, Croydon, Lewisham, Tower Hamlets, City of London, Bromley	No
Better Bankside	Yes – see part A
Team London Bridge	Yes – see part A
The Blue	No
We are Waterloo	No
South Bank BID	No
Southwark Commerce	No
Clinical Commissioning Group	Yes – approved with broad support – see Part A
Health & Wellbeing Board	Yes – approved with broad support at meeting – no written response provided
Public consultation	34 responses – see part B

Part A – Responses from Statutory responders

GLA response

Comment Number	Comment	Response
1	The plan provides the minimum level of background information, this is not a problem as it focuses on the actions, but it would be beneficial to include some of the mapping and source apportionment charts from the LAEI 2013	The background information and mapping and source apportionment are included in the separate Appendices document
2	A particular area for commendation is the inclusion of firm targets for most of your actions.	Noted
3	Measure 2 - 1 - What is the technical guidance? – will it be a Supplementary Planning Document or a non-statutory document? We'd suggest the former if possible and stephen.inch@london.gov.uk is available to offer advice	This document will be technical guidance for the time being due not being able to resource writing a new SPD in Planning Policy work programme at present as the Southwark Plan is being revised. Will consider timetabling a new SPD when the Southwark Plan review is complete. See measure 2 – 1
4	Measure 2 - 3 - A campaign focused in this way on fuel type and fuel economy sounds like a really good targeted approach	Noted
5	Measure 3 - 1 It would be useful to specify that you mean TfL STARS accreditation.	TfL STARS inserted into the measure
6	Measures 3 – 1 to 3 – 3. Could you include specific quantified targets here?	Discussed with the relevant services/teams and quantified targets have been inserted.
7	The level of Public Health involvement/leadership in projects is supported.	Noted
8	Measure 4 – 6. This is very positive active but requires a timeline for completion.	Timeline included
9	Measure 4 - 11 – We really need your support with regards to charging infrastructure for taxis, to support the Mayor's requirement that all newly licenced taxis much be zero emission capable from 2018.	New measure added to the Action Plan – Measure 4 – 12. The old measures renumbered
10	Section 5 – Whilst it is supported to have an integrated approach to carbon and air pollutant reduction it needs to be made clearer in the title and the introduction that this is an integrated strategy, otherwise the carbon section doesn't really work/fit.	New sub-header inserted in the title row to explain these air quality actions are extracted from the Authority's Carbon Reduction Plan
11	Section 6 - is very comprehensive	Noted
12	Section 7 – it is very positive that you have included this section. Action/s 7 - 1 are key – we support all of these aims but they need timelines – for example, when will the monitoring begin and what is the deadline for instigating projects in each of the focus areas?	Timelines have been included in the Action Plan

Environment Agency response

Comment Number	Comment	Response
13	We support the general theme throughout the Air Quality Action Plan (AQAP) of identifying air quality as a strategic factor within local planning policy and through Southwark's Joint Strategic Needs Assessment (JSNA) for public health.	Noted
14	We note the actions in the plan are not time bound and we suggest that delivery of the plan are reviewed against SMARTT criteria (i.e. Specific, Measurable, Assignable, Realistic, Resourced, Time Bound) in order to support its actions.	Action plan reviewed with timescales and revised targets included for all actions
15	<p>We consider the Plan could place more emphasis on spatial planning as a way of implementing the AQAP actions through development.</p> <p>The AQAP is part of a local authority's evidence base required to support its local plan and assess the effectiveness of its development management policies. Policy DM60 of the New Southwark Plan Strategy reflects the need to consider the impact of poor air quality, to minimise air pollutants and reduce residential exposure.</p> <p>This is in line with the London Plan's Policy 7 - 14 Improving air quality which states that, boroughs should have policies that:</p> <p>a seek reductions in levels of pollutants referred to in the Government's National Air Quality Strategy having regard to the Mayor's Air Quality Strategy</p> <p>b. take account of the findings of their Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated.</p>	Noted
16	<p>Policy 7 - 14 also requires boroughs to ensure that development proposals 'minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAS)'. Please also refer to Planning for Air Quality Document http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf</p>	Noted

Comment Number	Comment	Response
17	<p>We would suggest that for larger development areas or opportunity areas, an air quality assessment is carried out for the whole area to establish baseline air quality and to assess the impact of the development plan for the area on future air quality, rather than relying on individual developer's assessments as this will miss cumulative impacts.</p>	<p>This approach will be included in the Authority's Technical Guidance on Air Quality and hopefully in an SPD in future</p>
18	<p>We recommend the AQAP includes an action to identify and manage the impact of growth and regeneration on waste management and industrial process regulated under the Environmental Permitting Regulations by:</p> <ol style="list-style-type: none"> 1. Ensuring any waste management facilities relocated due to redevelopment master plans, are suitably planned and funded to allow operators to invest in appropriate dust management control infrastructure to minimise the creation and migration of dust from the activities. In certain circumstances, where particular waste management activities occur in close proximity to receptors this may include the provision of a building. 2. Ensuring that where redevelopment results in bringing receptors closer to existing regulated processes, full consideration is given to whether and how, infrastructure to minimise the impact of those industries need to be improved as receptors have been brought closer to them. <p>Where new residential development is proposed in close proximity to existing regulated processes we recommend the planning process is used to require mitigation measures. These could include quadruple glazing, and storage rooms only facing waste sites, not living rooms / bedrooms.</p>	<p>Noted. This will be included in the Authority's Technical Guidance on Air Quality and dealt with through the planning process</p>
19	<p>We support the ongoing commitment under Section 1 to maintain Air Quality Monitoring capability through continuous and periodic monitoring equipment.</p>	<p>Noted</p>

Comment Number	Comment	Response
20	<p>We support the recognition of the measures identified under Section 6 (Regulation) of the draft plan and would welcome the opportunity to discuss any potential cross-over with the plans ambitions on the sites we regulate.</p> <ol style="list-style-type: none"> 1. The Environment Agency regulates waste management process in the Borough, some of which have the potential to generate dust. It is our intention to review dust management practices at these operations with a view to ensuring appropriate techniques are being used to minimise the creation of dust and its migration off-site. You are welcome to assign this as an action to us in your plan if you consider it appropriate. 2. We would suggest that for larger development areas or opportunity areas that an air quality assessment is carried out for the whole area to establish baseline air quality and to assess the impact of the development plan for the area on future air quality, rather than relying on individual developer's assessments as this will miss cumulative impacts. 	<p>A new measure will be added to Section 6 Regulation See Measure 6 – 12</p> <p>Noted</p>
21	<p>We note the source apportionments in Appendix 4 of the Technical Appendices (page 22) identify re-suspension as a significant proportion of PM₁₀ emissions in the Borough, but that there are no specific targets relating to road sweeping. From our experience of regulating a cluster of waste operations in the Borough, we are aware access for road sweepers can be hindered by parked and/or abandoned vehicles.</p> <p>We would recommend the council considers actions are assigned for both targeted road sweeping, and initiatives that will enable sweeping to be effective.</p>	<p>An appropriate new measure will be discussed with appropriate services/teams and potentially added to a future update to the plan. Most dust is generated by construction and should be dealt with via the relevant developer via their Construction Environment Management Plans, see Southwark's technical guidance for construction</p>

Better Bankside response

22	<p>Air Quality Strategy</p> <p>We feel it lacks detail on:</p> <p>Overall objectives of the strategy & plan and how these relate to the borough's Strategic Plan</p> <p>Key partners beyond the GLA in the delivery of the strategy & action plan including Business Improvement Districts (Better Bankside, Team London Bridge, Blue Bermondsey)</p> <p>The expected duration of the plan, how it will be updated when required and how the overall impacts will be measured</p> <p>Who is responsible for overseeing its delivery</p> <p>How other borough plans (e.g. Cycling Strategy) can deliver the objectives of the Air Quality Plan.</p>	<p>This document will be part of the Authority's Sustainability Plan which will link all the plans together</p> <p>Will include BIDs by expanding the bullet points in paragraph 2 of the Air Quality Strategy</p> <p>The Air Quality Action Plan is a fluid document and will be reviewed every year when the Annual Progress Report is compiled. Out of date measures will be deleted and new measures added to keep the document current</p> <p>Cabinet Member for Public Health, Parks and Leisure will be overseeing delivery</p> <p>The Strategy aims to ensure that local air quality policy is co-ordinated with other relevant local policy documents including the Cycling Strategy</p>
23	<p>Section 1 – Management of Air Quality: Monitoring Air Quality</p> <p>There only two continuous monitoring stations in Southwark at the moment. Modelling data from Kings College London and the GLA Focus Area designation indicates that parts of our Bankside consistently experience poor air quality. However, without any kind of monitoring we are unable to accurately measure air pollution or assess the impact of any measures.</p> <p>We note the general commitment in Action 7 - 1 to ensure that local air quality in the GLA Air Quality Focus Areas is monitored and that one of these areas is 'London Bridge at Borough High Street'</p> <p>We would therefore strongly endorse including in the plan the commitment to install some kind of roadside monitors that can measure both NO₂ and PM₁₀ in the following locations:</p> <p>Borough High Street (northern section between Southwark Street and London Bridge Southwark Bridge Road junction with Southwark Street, Blackfriars Road junction with Southwark Street/ Stamford Street.</p>	<p>The Authority has planned to increase the number of locations where air quality monitoring occurs, with an increase of Nitrogen Dioxide diffusion tubes in the Air Quality Focus Areas. Locations suggested in the comments will be considered during the review</p> <p>Locations suggested in the comments will be considered during the review of monitoring locations</p>

24	<p>Section 2 – Reduce Emissions</p> <p>Action 2 - 3: We welcome the commitment to an annual campaign to raise awareness of the role of fuel type and fuel economy can play in reducing emissions. We would be keen to work with the Council to see how this messaging could be tailored to relevant business decision makers including:</p> <ul style="list-style-type: none"> Fleet operators Business procurement leads Office managers. <p>This campaign would be most effective if combined with communications more generally on behaviour change that can have an impact on improving air quality (Action 3 - 8).</p>	<p>The measure was aimed at domestic heating fuel type and fuel economy. Measure 2 – 3 has been made explicit to mention heating</p> <p>The authority would welcome working with the BID's to set up work programme/s to provide a wider campaign in the Borough.</p> <p>A new action has been included in section 4 Reduce Emissions from Road Traffic to include a campaign working with BIDs to include Fleets. See Measure 4 – 24</p>
25	<p>Section 3 – Public Health, Education and Awareness</p> <p>Actions 3-3: Better Bankside has a long track record in promoting commuting trip by cycle or on foot. We will continue to do this, guided by targets set every 5 years following a comprehensive Employee Travel Survey. We are focusing on trips made during the working day and suggest that this should also be focus for this Air Quality Plan.</p> <p>We would welcome further collaboration with the Council on measures such as those consistent with the 2015 Southwark Cycling Strategy. These include:</p> <ul style="list-style-type: none"> Greater promotion and provision of cycle confidence training, including to those working in the borough Work to improve cycle parking provision, both short term and for commuting Provision and promotion of quality cycle routes along roads with lower air pollution. <p>We understand that an updated Walking Strategy is still preparation. This should also focus on measures that promote walking trips along low emission routes, such as The Low Line.</p>	<p>Noted – comments will be passed to Transport Policy</p>
26	<p>Actions 4 - 3 to 4 - 5: We fully endorse efforts to consider how best freight consolidation could be applied for Southwark, partnership with neighbouring boroughs. We suggest that it would be helpful to include a reference to the borough's Business Improvement Districts as potential partners in ensuring that a solution is used by the maximum number of employers.</p> <p>As well as FORS accreditation, we would welcome the inclusion of the commitment to ensuring that suppliers are using the lowest emission vehicles</p>	<p>The measures 4 – 4 & 4 – 5 have been amended to include the BID's and it will be included in the contract requirements that suppliers will be required to lowest emission vehicles</p>

	possible regardless of whether they are using the freight consolidation facility.	
27	<p>Section 4 – Cleaner Transport Reducing Emissions from Delivery and Servicing</p> <p>We welcome the inclusion of Action 4 - 5 with the specific reference to our area, but again suggest that this could be strengthened by a specific reference to joint working with Better Bankside and our neighbours Team London Bridge.</p>	Measure has been amended to include BIDs
28	<p>Reducing emissions from vehicles and Taxies & Private Hire Vehicles</p> <p>Action 4 - 11 - We fully support lobbying TfL to ensure that PCO licensing includes a Smarter Driving training elements. We would like to see this go further and would welcome the Council's support in calling for all taxis and PHV's within the Central Activities Zone to be zero or very low emission vehicles.</p>	The Council supports the Mayor of London measure to require all new PHV and Taxis to be zero emission capable.
29	<p>Actions 4 - 13 to 4 - 14 - We fully support working with TfL to reduce emissions from buses and the proposed extension of the Ultra-Low Emission Zone to the South Circular</p>	Noted
30	<p>Action 4 - 19 - Our Bankside Wardens service is provided in partnership with Southwark Council's JET teams. We welcome action on anti-idling enforcement and look forward to working together to ensure that this is targeted in areas and at times of day where it is most needed.</p>	We welcome co-operation on this measure and Bankside wardens have been included in the measure.
31	<p>In addition to these actions, we would welcome the inclusion of a new Action that commits Southwark Council to partnering with Business Improvement Districts and other relevant stakeholders in commissioning research into what would be the most effective measures to reduce motorised traffic in the north of the borough.</p>	New measures 4 – 29 & 4 – 30 has been added to the plan. The detail of this measure will need to be considered with Transport Policy
32	<p>Section 5 – Reduction of carbon emissions</p> <p>Actions 5 - 1 to 5 - 6: We fully endorse the requirement for major developments to be both zero carbon and Air Quality Neutral. We would like to see more detail in due course of how this can be enforced.</p> <p>We suggest that the 'off-setting funds' be made fully transparent and able to be accessed to fund a range of projects that have a positive impact on local air quality. For our area, the Bankside Neighbourhood Forum could have a role in helping to decide where funds should be allocated. We would welcome the opportunity to explore how Better Bankside could add value through match funding.</p>	This will subject to Planning regulations regarding the 'off-setting of carbon funds'. We welcome the offer of match funding from the BID

33	<p>Section 6 – Regulation Emissions from construction equipment</p> <p>Actions 6 - 5 to 6 – 6:- We support the commitment to sure all strategic and major construction sites comply with GLA SPG criteria. We would welcome the opportunity to see how major developments in our area and in particular members of the Bankside and London Bridge Logistic Group could develop best practice or pilot new equipment or methods that further reduce emissions.</p>	<p>We welcome the expressed support and will work with the BIDs to develop best practice or pilot new equipment or methods that further reduce emissions as an extension of the ongoing London Low Emission Construction partnership of which Southwark is a current partner</p>
34	<p>Section 7 – Support the GLA Air Quality Aims GLA Air Quality Focus Areas</p> <p>Action 7 - 1: - We note the provisions made here to develop specific projects in the GLA Air Quality Areas. In the absence of any further detail at this stage, we would strongly urge that discussion on those projects start as soon as possible for the London Bridge / Borough High Street area, in collaboration with us here at Better Bankside and our colleagues at Team London Bridge.</p>	<p>We will discuss any proposals with all relevant organisations when the specific projects are being considered for the GLA Air Quality Focus Areas</p>
35	<p>Section 8 – Air Quality Projects in the Borough</p> <p>Action 8 - 5: - Better Bankside is already collaborating with Southwark Council in the delivery of projects related to air quality, notably the Clean Air Mini-Neighbourhood funded via the Mayor’s Air Quality Fund. We bring both capacity and match funding and would be happy to explore further opportunities to jointly fund air quality projects that meet our members’ objectives.</p>	<p>The Authority will continue to welcome and explore further opportunities to jointly fund air quality improvement projects with the BID areas</p>
36	<p>Further Actions we suggest should be included in the Action Plan</p> <p>We very much regret that references to increased urban greening and green and healthy streets are not picked up in the action plan. We very much believe that to support the aims of the action plan that the importance of the quality of our streets and public spaces, in terms of pedestrian and cycle comfort, and green infrastructure needs to be considered.</p> <p>We suggest that these further actions should be included include in a section called ‘Clean and Healthier Streets:</p> <ul style="list-style-type: none"> • Investments in public realm enhancement and maintenance should be assessed against criteria as set out in Transport for London’s Healthy Streets approach. • Targets should be set for increasing the quantity and quality of on-street urban greening to help reduce exposure to air pollution. This could include street tree planting, on-street rain gardens, green walls or other on street planting. 	<p>These are very useful suggestions.</p> <p>The ‘Healthy Street Approach’ has been adopted via the Authority’s Draft Kerbside Strategy, currently out to public consultation, and a new measure has been included See measure 6 – 5</p> <p>A new measure 6 – 4 has been inserted to increase the amount of green infrastructure in the borough</p> <p>The rest of the measures have been re-numbered to incorporate new measure 6 – 4 & 6 – 5</p>

Team London Bridge Response

37	<p>TLB has a strong remit from businesses since 2015 to deliver the London Bridge Plan. Our mission is to ensure London Bridge excels as a leading place for global commerce and continues to develop as a pioneering local centre for enterprise, culture and entertainment.</p> <p>As a place, there are clearly issues around poor air quality – whether along the Tower Bridge Road or Borough High Street, or as shown through image in the media of the Shard surrounded in polluted fog. Poor air is a real issue and affects our reputation as an attractive place to do business. We shall be promoting measures to improve air quality alongside the borough, so will be an active and supportive stakeholder</p>	Noted and welcomed
38	Health impact. The strategy indicates poor air quality affects health outcomes of 9,500 people. This should read that this number have died	Death due to poor air quality is not recorded on death certificates and the methodology to calculate these figures are based on life-years lost, which are then translated to the equivalent deaths at typical ages
39	<p>Partnership.</p> <p>In general, the strategy and action plan cover a broad number of agendas, and shows strong joint action across council departments, including health. We think this is very positive. However, we would like to see explicit indication of working in partnership with other borough and non-borough stakeholders to achieve better air. This should include BIDs</p>	BIDs are now specifically referenced in several actions in the action plan
40	<p>Targets.</p> <p>There are no targets indicated in the strategy. It is important to have this so that as partners we can strive to deliver outcomes – for example a reduction in the number of focus areas</p>	The Strategy gives the overall of aims and objectives of air quality in the Borough The targets are included in the action plan
41	<p>Monitoring.</p> <p>There is insufficient monitoring in Southwark of main roads, and particularly Transport for London roads, and it is unclear if there is sharing of data between partners with data. TLB is working with University College London on the Fresh Air Square to monitor air quality through a AQ Mesh monitor – which can monitor every 15 minutes. The Diffusion tubes used by the Council are accurate at the point the data is collected, but this may not pick up the peaks of poor air.</p>	<p>The Authority has planned to increase the air quality monitoring in the Borough. The locations mentioned in the comments will be included in the review</p> <p>Data for air quality monitoring is available on the London Air Quality Network website and on the Southwark website in the revised Air Quality section and the council is satisfied with the prediction maps in the London Emission Inventory</p> <p>The authority is assisting the MAGIC project – “Managing Air for Green Inner Cities”. This project comprises of three components:</p> <p>(i) a fully resolved air quality</p>

		<p>model that interacts with sensor data and provides detailed calculations of the air flow, pollutant and temperature distributions in complex city geometries and is fully coupled to naturally ventilated buildings, and green and blue spaces;</p> <p>(ii) reduced order models that allow rapid calculations for real time analysis and emergency response; and</p> <p>(iii) a cost-benefit model to assess the economic, social and environmental viability of low cost air quality monitoring options</p>
42	<p>Green infrastructure and clean routes.</p> <p>We would like to see greater emphasis on the role greening can play, whether along clean routes or on buildings – either retrofitted or as part of the design. Wording from the Mayor’s ‘A City for all Londoners’ document mentions that new buildings should be “air quality positive”, with greening a key element, and the GLA is also promoting Healthy Streets, which can be an aspiration (with funding attached) in the borough.</p>	<p>The ‘Healthy Street Approach’ has been adopted with the Authority’s Draft Kerbside Strategy and a new measure 6 – 5 has been included</p> <p>A new measure 6 – 4 has been inserted to increase the amount of green infrastructure</p> <p>The rest of the measures have been re-numbered to incorporate new measure 6 – 4 & 6 – 5.</p>
43	<p>Supportive transport infrastructure (4).</p> <p>There is a focus on information, but very little information about funding of infrastructure to support cleaner transport – for example cycle parking, cycle routes, clean routes for walking and cycling (particularly related to purposes of education, commuting or visiting), EV charging points or supporting Santander cycle hire points – all relevant in the London Bridge area, and to which we can potentially provide matched funding.</p>	<p>The funding for the Air Quality Action Plan is from existing Authority resources or from successful grant bids. There are targets in the action plan for more infrastructure to increase active travel. The offer of match funding has been passed to Transport Policy</p>
44	<p>Road pricing Action 4 - 14.</p> <p>It is positive that Southwark can have a voice to push for ULEZ. We suggest that Southwark also play a stronger role demanding the GLA look at road charging up to the South Circular as stronger policies are clearly needed to limit traffic and congestion.</p>	<p>Noted – suggestion passed to Transport Policy for consideration</p>
45	<p>Freight (4).</p> <p>Activities around reducing emissions from delivery and servicing are very important and these are detailed. The Action Plan mentions a number of activities through freight, which is very positive – and we hope to be able to work with Southwark to deliver this work. There is no mention of exploring more delivery and servicing via river or rail – with</p>	<p>Measure 4 – 5 will be amended to include the BIDs and to promote the rationalisation of deliveries and servicing in the London Bridge area, where rail and river based options could be explored for some products</p>

	potential for both in the London Bridge area.	
46	<p>Developers (5).</p> <p>Does the zero carbon objective based on the London Plan go as far as the current Mayor's plans for the new London Plan – if not then this should be updated alongside any new policy – as mentioned in 7 - 4.</p>	The reference to London Plan is not time specified therefore the objective will be applied in accordance with current London Plan at the time of planning application receipt
47	<p>New Southwark Local Plan (5).</p> <p>We are supportive of the use of robust planning polices in the New Southwark Plan being used to deliver air quality benefits, and a strong and constantly evolving design and construction SPD to support this, encouraging innovative and effective measures. However, having contributed to a first draft of the new Local Plan Area Visions and site allocations (not the Development Framework), there is very little emphasis on greening or air quality positive development</p>	A new action 6 – 4 has been incorporated into the action plan to increase green infrastructure in the Borough. This comment will be shared with Planning Policy

Response from the NHS Southwark Clinical Commissioning Group

48	<p>The CCG welcomes the focus on air quality especially given the risks and implications to long term health conditions. The communication of such risks to the public and professionals are key. The actions are clear and look to address a number of areas. We offer our broad support to the strategy and action plan.</p>	Noted
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Part B – Responses from non – Statutory responders

Southwark Green Party response

49	The strategy acknowledges the severe impact of air pollution on the health of Southwark residents, noting in the introduction that ‘poor air quality disproportionately affects the young, old, ill and poor’ (page 5). But this recognition of the serious public health challenge is not matched by actions.	Noted. The council is legally constrained with the actions it can implement but does work with and lobbies other agencies to take more effective action to improve air quality
50	The plan is not strong or bold enough, and it does not provide enough detail of those actions the council does propose to take. We are dismayed that so many items lack clear targets, timescales, objectives and means of measuring success. This is particularly noticeable in comparison with Southwark’s previous plan which included timescales and indicators for each planned measure (Air Quality Improvement Strategy 2012-2017 and Action Plan 2012-2017 (AQIS 2012)).	The Air Quality Strategy and Action Plan has been reviewed to include clear targets and timescales for all actions. The means of measuring success will be through the annual ASR reports to the GLA as part of the London Local Air Quality Framework management regime
51	The introduction states that ‘Southwark is committed to integrating our Air Quality and Climate Change policies’. We welcome this fundamental insight that the two areas are interlinked. Given the council’s responsibility for public health, we feel that it is important that all council staff are aware of how actions their departments take will affect residents’ health. We note the ambition to ‘maintain a cohesive suite of policies by co-ordinating local air quality policy’ with other areas such as the Kerbside Strategy and Tree Planting, Parks and Green Spaces, but would like some detail of how this will happen. We would like to see more evidence of how council departments such as Housing, Regeneration, Education and Public Realm will be delivering infrastructure and services that support reductions in carbon consumption and polluting emissions. How will they be made aware of the air quality strategy? How frequently and in what way will they report back on their success in delivering reductions?	Other service areas will be made aware of the AQ strategy through the senior management team and will be required to report back annually as part of the London Local Air Quality Framework management regime
52	We are concerned that this action plan does not refer to the success or failure of actions in previous air quality plans. For example, increasing registration for AirText alerts was an action point (Measure 17) in May 2012 (AQIS, 2012). In a deputation to the council in July 2012, Southwark Green Party called for information on AirText to be sent to all head teachers as a minimum step in increasing awareness of how parents and teachers can reduce children’s individual exposure levels. We have been informed that only three Southwark schools have signed up for alerts by January 2017. Clearly, this makes us very doubtful about whether the council will deliver on its new	The success of previous action plans are recorded in the annual progress reports, which can be found on the Southwark webpages in the Air Quality section Further actions to improve the uptake of air quality information with schools are being pursued as the authority is currently devising guidance on local air quality to be provided to all schools in the borough. Sadly promoting air quality

	promise (3-5) to promote AirText and Walk-it.	issues to schools and providing them with information does not guarantee participation. 12 schools in the borough have undertaken the Cleaner Air for Schools educational programme and several more have been involved in Clean Air Action Days. That said - noted and we will revise our future approach to hopefully achieve better take up
53	Alerts are only a tool to reduce individual exposure, and it is more important to enable behaviour change to reduce overall pollution levels - for example, to reduce the number of car journeys to take children to school. The most publicised recent air pollution work with Southwark schools was the 'Clean Air 4 Schools' project run by LSx. But this was an 'awareness project' rather than a 'modal shift project'. Data on behaviour change was only collected from two schools. This is completely inadequate. We call on the council to actively pursue modal shifts for journeys to school and to collect sufficient information to assess what works. AQ/S (2012) states: 'Incorporated within the Council Plan is a target to reduce the number of children being driven to school from a baseline of 15.7% in 2010-11 to 13% by 2013-14. In the past 5 years a 5% decrease in numbers has been achieved.' Was this target achieved? And what is the target for 2017-19?	<p>The authority requires each school to have a travel plan which includes modal shift elements which has ongoing targets to reduce travel to school by private car</p> <p>The target for 2013 – 14 was met and the number of travel to school journeys has been further reduced</p> <p>As grant funding is successfully bid for further projects aimed at parental choice are planned</p>
54	Finally, we believe that Southwark residents are very concerned about the impact of air pollution on their health and would welcome a stronger action plan. We want to see real actions to cut emissions of nitrogen dioxides and particulate matter in the borough.	The action plan has been reviewed, updated and when ratified will be considerably stronger than its previous iteration
55	<p>In summary, we propose:</p> <ul style="list-style-type: none"> • measurable actions and targets to help monitor progress, and on a scale equal to the seriousness of the public health challenge – with monitoring indicators to include data on behaviour change; • transparency concerning the delivery by council departments such as Housing, Regeneration, Education and Public Realm of infrastructure and services that help reduce carbon consumption and polluting emissions; • provision of clear feedback concerning these departments' success, or otherwise, in enabling reductions; • an assessment of the lessons learned from previous air quality plans, and of how this strategy avoids repeating past mistakes. 	Noted
56	<p>1) We welcome these actions:</p> <p>6 - 1 'Enforcement of the Clean Air Acts' by</p>	Noted

	<p>ensuring that all retail premises selling wood and coal are aware that the whole of the Borough is a Smoke Control Area.</p> <p>6 - 2 'Discourage burning of logs and house coal in the Borough' through a communication campaign.</p> <p>4 - 2 'Develop a freight consolidation solution for Southwark' and 'All Southwark Council suppliers to use the proposed freight consolidation solution where possible'. We are pleased to note that these items have dates and targets.</p> <p>4 - 18 Train all Joint Enforcement Team (JET) officers in Road Traffic Act anti-idling enforcement. We note that idling is an increasing problem on side streets near major junctions such as Elephant and Castle, both by delivery drivers and Uber drivers, as well as outside schools. We welcome both education and enforcement</p>	
57	<p>3 - 1 Encourage children to walk or cycle to school'</p> <p>The plan talks only of increasing the number of Gold and Silver accredited schools.</p> <p>How many are there in the borough now?</p> <p>What would be a good level to aim for?</p> <p>How will an increase be achieved?</p>	<p>The number of schools with Gold TfL's Star Accreditation at present is 11 schools</p> <p>The number of schools with Silver TfL's Star Accreditation is 11 schools</p> <p>New targets have been included</p> <p>The increase will be included within the officer work program</p>
58	<p>We would like to see targets along the lines of the following:</p> <ul style="list-style-type: none"> • Every child will participate in cycle training at primary school • Sessions of individual transport planning will be offered at every primary school to help families shift away from using cars on the school run. Volunteer parent champions for clean transport will be trained to cascade advice to other families. • Enforcement of no-idling around schools. The previous plan, AQIS 2012, included an indicator for this: 'The number of idling vehicles owner requests to turn off engines and percentage of FPN issued' (Measure 4). Why is there no such indicator in the current 	<p>All Southwark schools are offered Cycle training for Year 5 & 6, some schools do not accept the offer. The authority also offers Holiday Club Cycling Training.</p> <p>There are no resources available for this at present, but will be considered if resources become available.</p> <p>At present there is no enforcement of vehicle idling legislation therefore FPN's are not issued. There is now a new measure for Parking Enforcement Officers (PEO) to be authorised to serve FPN's in the Parking Enforcement contract when</p>

	<p>plan?</p> <ul style="list-style-type: none"> • Provide access to cycles for staff. This is not a new action so the target should involve increasing uptake. How many Southwark staff currently use pool bikes/their own bikes for council business? How can this be increased? How might the provision of non-standard cycles such as trikes and cargo bikes allow more staff to benefit? 	<p>the current contract is amended.</p> <p>The target has been changed to increase the uptake of cycles for staff by 5% per year</p> <p>There are 7 pool bikes for the use by Southwark staff. There are currently 110 staff using their own bikes for council business and many more use public transport</p>
59	<p>Promotion of availability of AirText and Walk-it apps’.</p> <p>3 - 5 We are told that a ‘plan for awareness raising programme to be devised by April 2018’. This is a ludicrous delay, given that the tools already exist and only need to be promoted, and that this item has been in the previous action plans. The council’s communications department could instead be tasked with increasing awareness by (say) 50-80% by the end of April 2017. The makers of the app may be able and willing to share anonymised information about the locations of users registered in Southwark which will provide evidence for increased use. We would like to see a target minimum proportion of the population that is aware of episodes of high pollution, and minimum proportion of local population aware of chronic high pollution in their area, with an indication of how this will be measured. The information about air pollution episodes and about how individuals can reduce their exposure by changing route or mode of travel should be diffused as widely as possible. The Plan could encourage other services and points of public contact such as local shops and amenities, sports centres, GP practices and community centres to register for the Air Text forecast and promote public awareness.</p>	<p>The target has been changed to September 2017. The implementation plan for this measure will explore methods to encourage other services and points of public contact such as local shops and amenities, sports centres, GP practices and community centres to register for the Air Text forecast and promote public awareness</p>
60	<p>5-14 ‘Promote the use of renewable energy and minimise the energy demand of Southwark Housing’. We would be pleased to see the council ‘explore the opportunity of installing renewable energy technologies and retrofitting insulation and energy efficiency measures’. We would like to see a target along the following lines: ‘all estate regeneration schemes and proposals to carry out major works to the roofs of properties (both street properties and blocks of flats) must include an assessment of the cost and potential income from installing solar panels at the same time. Residents should be offered the opportunity to set up community energy schemes on estates.’ Similarly, all plans for major repairs to lighting on estates should include an assessment of low energy alternatives and motion sensor systems. Where the energy savings will pay for themselves within 5 years, these should be</p>	<p>New measures 5 – 15 to 5 – 16 have been included in the revised action plan</p> <p>The rest of the measures have been re-numbered to incorporate new measure 5 – 15 to 5 – 16</p> <p>Estate regeneration will ensure the project meets current energy requirements during the planning process</p> <p>The installation of motion sensors on estates may not be practical from a community safety aspect in some locations. Low energy bulbs can be considered where light fittings will</p>

	made a priority for investment.	take them
61	<p>3) We want to see additional actions</p> <p>a) Phase out diesel</p> <p>There is no mention of diesel in the document. This fuel has been identified as a carcinogen by the WHO and there have been calls for a London-wide ban on diesel. Please include in this plan details of how you will reduce pollution from Southwark Council's activities by changing the fleet to diesel-free and electric vehicles; training drivers (both of fleet vehicles and contractors) to turn off engines when stopped; and enforcing anti-idling legislation for members of the public and delivery vehicles. We would like to see Southwark Council commit to ending all new purchases of diesel vehicles for its fleet within the life of this plan.</p>	<p>The council fleet is in the process of being replaced with alternative fuelled or petrol based vehicles. Presently there are some specialised vehicles are not available with non-diesel engines. There is an instruction to Council drivers to switch off the engine when parked. We are also currently exploring the viability of differential parking charges and permit fees based on vehicle fuel type and have lobbied government to invest in a diesel scrappage scheme</p>
62	<p>b) Reduce idling</p> <p>4 - 18. Train all JET officers in Road traffic Act anti-idling enforcement. Please give a target date for the training. We would like to see targets and timetables such as: reduce idling outside schools to 0% through a combination of education and enforcement by June 2017.</p>	<p>Due to the resources required the authority will not be able to reduce idling outside schools by June 2017. The Authority is working towards authorising street based staff to enforce vehicle idling legislation and is considering appropriate locations for School Streets interventions in appropriate locations</p>
63	<p>c) Insulate council blocks</p> <p>Please include in this plan details of how you will insulate council properties to reduce fuel consumption and consequent emissions from domestic heating.</p>	<p>There is a 'Decent Homes' programme within the Housing and Modernisation Department to deal with the council residential properties, which includes increased insulation</p>
64	<p>d) Give details of concrete actions to promote walking and cycling</p> <p>These could include:</p> <ul style="list-style-type: none"> • reinstating the cancelled cycle loan scheme in order to help people start cycling • creating protected cycle lanes the length of the Old Kent Road • supporting private landlords in providing cycle parking for shared houses and blocks of flats by setting up a bulk buy scheme for approved designs of cycle lockers • replacing the Christmas season waiver of 'pay and display' car parking fees with a temporary cargo bike delivery scheme to encourage people to shop on foot in local high streets 	<p>Southwark has a staff cycle loan scheme for those who wish to commute by cycle. The maximum loan available through this scheme is £1,000</p> <p>This is proposed in the Old Kent Action Plan</p> <p>No resources to support this action, however secure cycle lockers are considered at planning stage for new builds and significant refurbishments</p> <p>The support for 'Small business Saturday' and the waiving of on-street parking fees in the North of the Borough and in Peckham, through December, costs the council little in revenue and effects only</p>

	<ul style="list-style-type: none"> making sure that new Quietway routes are suitable for age 8-80 and are safe to access 24 hours a day. This could mean, for example, removing some car parking spaces on Wells Way to create a link in cycle route Quietway 7 that doesn't involve cycling through Burgess Park. Ambitions to increase the numbers of people cycling in the borough must be linked to air quality policy and therefore given a high priority. 	<p>about 55 parking bays whilst encouraging local, rather than distant, shopping. Evaluation studies show there are already low levels of car use facilitating shopping in Southwark</p> <p>This is outside the scope of this action plan. Comment will be forwarded to Transport Planning for consideration as part of the Cycling Strategy</p> <p>The Authority ran campaigns to increase people cycling in the Borough throughout 2016. This was linked to air quality. The link between air quality & active travel is in place</p>
65	<p>e) Give details of transport alternatives that could be promoted to residents</p> <ul style="list-style-type: none"> promote local car clubs. There is no mention of car clubs in the current plan, whereas AQ/S 2012 stated: 'Southwark will continue to encourage the use of the car club schemes, monitor and report on uptake and allocate additional spaces should demand warrant'. Why is this not in the current plan? where membership of a car club is provided to purchasers of flats in car-free developments, this should be publicised and promoted to surrounding residents to increase uptake and supply of shared vehicles in the area. publicise car-sharing schemes for longer journeys that use social networks (e.g. Blablacar) offer opportunities to try cargo bikes, child seats, tag-along bikes, trikes and non-standard bikes that may be suitable for older people or those with disabilities. publicise car-shares, cycle loans and supermarket delivery schemes as part of a package that will enable residents to give up a private car and make financial savings and health improvements. 	<p>A new measure 4 – 31 has been included in the plan</p> <p>Noted</p> <p>We promote car-sharing schemes on the Southwark air quality web-pages.</p> <p>This could be included within future air quality and cycling promotional campaigns</p> <p>Noted. Will publicise when relevant to future modal shift and air quality campaigns</p>

Comments from a responder using an on-line form - responses

66	Web Ref No: 22712 AQSAP-clear-and-easily-understood: Useful-non-tech-summary?: Understand-AQSAP-objectives:	Yes Yes Yes	Noted
67	Agree-with-AQSAP-objectives	I think they are far too conservative and avoid tackling the key causes i.e. transport and the volume of the wrong sort of traffic	Noted
68	Are-measures-suitable-for-Southwark:	Yes they are relevant but relatively ineffectual	Noted
69	Do-measures-go-far-enough-or-need-more-development:	Much further. I would like to see much more road space reallocation to reduce the volume of traffic. Which, by the way, is no longer considered economically significant. Maybe public transport, but this should all be CO ₂ neutral anyway	Noted
70	Other-measures-to-be-included?	Banning of diesel vehicles. Total ban of all vehicles on certain days, maybe Sundays, to allow cycling to take more hold and for pedestrians to experience what not having pollution is like. To say you cannot act because you are just one borough in 32 is just not good enough. Southwark is an inner London borough and should therefore take more of a strategic role	Noted, possibly will be able to undertake actions in some neighbourhoods but closure of bus routes and main routes unlikely to be possible as the TRN roads are not managed by Southwark
72	Initiatives_to_reduce_pollution_near_schools	Vehicle bans at peak arrival and drop off times. They have done this in Scotland I believe. A ban of parents dropping off children at school by car. Imposition of penalties for persistent offenders.	New measures 4 – 24 & 4 – 25 have been added. The authority will be participating in the GLA Air quality Audit at primary schools and is currently shortlisting schools for a 'School Streets' pilot
73	Agree_with_enforcing_law_to_stop_idling_engines?:	Yes	Noted
74	Any_vehicles_that_should_be_concentrated_on	Diesel of course	Noted
75	Any_areas_to_be_tackled_first?	All areas. Blanket action. There may be hotspots but everyone knows how serious this issue is. You cannot expect people to be less car dependent if you cannot improve the environment for walking and cycling.	Noted. Kerbside strategy to improve environment for walking and cycling currently under consultation

76	Agree_that_developers_should_actively_improve_air_quality	Of course	Noted
77	Info_for_website:	<ul style="list-style-type: none"> • Air pollution levels • Advice on how you can reduce your own impact on air quality • Information on the health effects of poor air quality • Information on initiatives that Southwark is taking 	All this information is currently on our AQ webpages
78	Priority_locations_for_monitoring_air_quality?:	Outside schools for education purposes. Monitoring is pointless generally if you don't act on the results	Current monitoring is used to check the efficacy of AQ modelling and policy formulation
79	Worthwhile-change-from-AQSAP	Not really. It is the elephant in the room. I am very concerned about it, for everyone. I cycle in London and teach people to cycle and think the quality of the air we breathe is on the whole pretty awful	Noted
80	Comments:	I think an analysis of journey purpose by vehicle would be an enormous education. We do not discriminate against non-essential vehicle travel and we should. I think people expect it now with the horrifying air quality figures for London	Noted – awareness and behaviour change actions are included

	Comment	Response
R1	I live close to the dual carriage way on Dog Kennel Hill. The air quality inside my flat frequently exceeds 3.5 ppm during the day. What steps are the local authority taking to reduce this to levels that fall within the EU's guidelines for domestic spaces?	Reducing the external concentrations of pollutants will help to reduce the internal levels. Internal sources of pollution (cooker/boiler) also contribute significantly to internal pollutant concentrations
R2	Hi. My opinion and additions to your plan. To "Discourage and prevent bonfires and open burning 6.8 ", will only help if Southwark can monitor the Scrap Dealers in Ilderton Rd. No mention of the waste incinerator based at Surrey Canal Road, nor the one in the Old Kent Road, which in my opinion of having lived in the area for over 30 years are major polluter and releaser of carbon particulates. The large building site near Decathlon, Surrey Docks is also not inferred directly. This site has been churning out dust and noise for many years now, and the dust it generates coats our windows, and can make breathing difficult, especially on warm days with low cloud	<p>If there are commercial premises burning waste and dust from construction sites, then the Authority's Noise & Nuisance Team can be contacted to investigate</p> <p>SELCHP is a process regulated by the Environment Agency. A new measure to include Environment Agency has been included, see measure 6 – 11</p> <p>The Integrated Waste Management facility on the Old Kent Road does not incinerate on site</p>
R3	I agree with the premise of the air quality and strategy and action plan. My only comment is in relation to encouraging more walking and cycling in the borough there needs to be more investment in infrastructure to support these aims and it makes it safer for people to walk and cycle - with dedicated and separate cycle lanes, better crossing facilities with longer crossing times and priority for pedestrians crossing and diagonal crossing to traverse box junctions.	The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. We are currently consulting on the Kerbside Strategy
R4	<p>It seems that there are a number of ways that a Local Authority can influence road transport based emissions and overall Southwark is failing to make the most of them in this strategy. There is little recognition in the strategy in relation to road transport that the dominance of the public realm by motor vehicles has a major impact of suppressing journeys by cycle and on foot and that to encourage active forms of travel, reasonable financial sticks and carrots can and should be used to reduce the impact of motor vehicles and Southwark has control over some of these levers. Three suggestions are made:</p> <p>1. Using pricing mechanisms to encourage the use of less polluting vehicles. A number of London boroughs (Merton, Camden and Islington) have used differential pricing for parking to discourage the ownership and usage of more polluting vehicles. The most obvious ideas are a) to increase the costs of resident parking for more polluting vehicles, b) to increase the costs of parking at shops etc. for more polluting vehicles and c) to increase the coverage of resident parking regime to cover the whole of the borough (as in Islington) so that these disincentives for high polluting vehicles apply to the whole of the borough and neighbourhoods are not left out of improvements.</p> <p>2. Procurement and Management of Contracts. To go further than is proposed and for no diesel vehicles to be purchased (other than for</p>	<p>Timeline has been included in the Action Plan</p> <p>New Measure 4 – 22 and 4 – 23 added to the Action Plan to review the charges for parking in the borough to promote use of less polluting vehicles</p> <p>The Authority's fleet contracts are being reviewed as they are renewed and controls can be considered for</p>

	Comment	Response
	<p>operationally critical reasons) by Southwark from now on and for all contracts with suppliers and agents (e.g. Housing Maintenance) and in other areas where Southwark has influence (e.g. vehicles used in relation to the delivery of planning applications) to stipulate the types of vehicles that will only be acceptable after a certain date (e.g. 2019) if a contractor wants to be considered in relation to a tender.</p> <p>3 Encouraging walking and cycling. The journey to school appears to be the most obvious example of increased travel being associated with a specific time of the day. In school holidays traffic levels are typically far lower at the start and end of the day. Concerted policies are needed to encourage children to travel to school on foot, cycle or by public transport. We know that they want to do that. There is enormous latent demand for cycling (far more would like to cycle than do now) and there are significant learning benefits from an active journey to school both from the exercise itself and the companionship that is gained with conversations en-route (to parents, carers and friends). As always a carrot and stick approach is needed. Walking and cycling can be made easier and more likely by having less traffic on the roads – the closure of Liverpool Grove at Lytham Street has resulted in far fewer vehicle movements in the area in the morning and a far safer environment around St Peter’s School. Some boroughs (Camden) are experimenting with closing streets adjacent to schools to make the environment around the school be and feel far safer. A wider neighbourhood approach could be taken to reducing through traffic as has been done in the mini-Holland scheme in Walthamstow Village thus removing much of the danger and intimidation associated with walking and cycling to school. LB Hackney has trialled giving incentives for people who walk to school (http://news.hackney.gov.uk/walking-is-literally-rewarding) which is a carrot approach that has had a positive impact. If Southwark finds a blanket approach too daunting, locations could be chosen for such an approach to be trialled such as Dulwich where the Safer Routes to School group is already well established and keen to implement projects. A more deprived area should also be chosen in order to assess what strategies work best amongst children and parents with lower levels of income.</p>	<p>council procurement contracts. There are limits to what the council can require of private developments through planning condition</p> <p>New measures 4 – 24 & 4 – 25 added to the plan to reduce parent & carer parking close to primary schools</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily</p> <p>We are currently consulting on the Kerbside Strategy</p> <p>The authority will be participating in the GLA Air Quality Audit at primary schools and is currently shortlisting schools for a ‘School Streets’ pilot</p>
R5	<p>I welcome the aim to extend the ULEZ to the south circular; it will reduce emissions and congestion within the central areas of Southwark. It would be great to see any money made from the ULEZ being used to reduce pollutants in central London.</p> <p>The report mentions but does not expand on the switching to alternative fuels for transport. Does this apply to upgrading the underground trains combustion engines? Surely the confined and underground nature of the station spaces is a highly</p>	<p>Noted. The finance from the ULEZ scheme is administered by TfL, so the authority has no direct influence on the spending of the charge</p> <p>Underground trains have electric lines</p> <p>TfL is the governing authority for London Underground, the comment</p>

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	<p>polluted and toxic atmosphere. The emissions from the underground above ground are also not mentioned, these are uncontrolled and hazardous, one near St. George's Circus emits copious amounts fumes and blows them onto nearby pedestrians.</p> <p>I would also mention that nowhere in your strategic aims does it mention encouraging or promoting other forms of transport. I believe it is the case that the main contributors of air pollutants in central London is cars and other vehicular traffic particularly those idle or in traffic. Reducing vehicular traffic in central London should be a priority of this strategy.</p>	<p>will be passed to TfL</p> <p>There are several measures within the Action Plan to reduce emissions from vehicles</p>
R6	<p>There doesn't seem to be a lot of actions aimed at reducing emissions from vehicles specifically.</p> <p>Actions to lobby TFL etc. regarding low emission and electric vehicles is welcome but I think more can be done, within the Council's powers, to reduce road traffic. As a cyclist I wonder if I am more healthy inside a bus than cycling on the road and if the air quality gets worse I will reconsider cycling. I think more measures to directly limit the use of cars and other polluting vehicles is needed to make a noticeable difference to air quality.</p>	<p>There are several measures within the Action Plan to reduce emission from vehicles</p> <p>the most polluted space is within vehicles in the flow of traffic. Air quality when cycling is markedly better</p>
R7	<p>It suggests some good things, but in my opinion it doesn't really go far enough, or have the necessary level of urgency. A few points:</p> <ul style="list-style-type: none"> • as I understand it, diesel vehicles are the key contributor to air pollution. If this is not correct, please let me know. The council could strongly endorse plans for tighter emissions charging scheme. The council should lobby for this to come in as soon as possible and communicate to residents on why it is taking this stance. Once the scheme is in place, the council should monitor what impact it has. For example, I imagine older taxis and large trucks are the most significant contributors. • it is necessary to encourage walking and cycling solutions, and to actively discourage use of diesel vehicles. Such actions should be focussed around schools - this will help with communications and persuading residents.- information schemes are useful, but only insofar as they build support for more material initiatives. I do not believe that informing people about bad air days, or encouraging people to switch off their engines, will have any real impact on pollution levels or health impacts. • it is key that the council walks the walk, and removes diesel vehicles from their own fleet. They should also encourage action among their suppliers, by setting procurement requirements. • the council should set a quantitative target for acceptable air pollution levels. A council 	<p>The London Mayor's Low Emission Zone (for HGVS & PSVs) and the Ultra-Low Emission Zone (for all vehicles), Taxi Strategy and bus Strategy are all aimed to reduce the number of polluting vehicles in the Greater London area</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. New measures 4 – 24 & 4 – 25 added to the plan to reduce parent & carer parking close to primary schools</p> <p>The Authority's fleet is being reviewed at present, with a view to increase the number of alternative fuel vehicles and the purchase of diesel vehicles, on operational requirement only.</p> <p>The strategy states that the authority</p>

	Comment	Response
	<p>member should take on responsibility for meeting this target, and progress should be regularly reported on. Without senior ownership of the issue, little is likely to take place.</p> <ul style="list-style-type: none"> urgency is key. Concrete actions should be taken as quickly as possible. 	<p>will be working towards to meet the national Air Quality Strategy objectives. The Cabinet Member for Public Health, Parks and Leisure will be overseeing the delivery of the plan</p> <p>Noted</p>
R8	encourage electric cars, more charging points, subsidised home charging sockets	Measure 4 – 1 is promoting the use of alternative vehicle fuels
R9	Re-instate the roundabout at "Elephant and catastrophe" for starters	This was a TfL project, this comment will be passed to them
R10	<p>I am pleased to see the plan covers a wide range of issues and is fairly specific about how they will be addressed.</p> <p>I am not so clear about how the council will be accountable to the Southwark population on its implementation of the plan, and I hope that communication will be open and not just serve to promote any successes. I'm particularly concerned that good data is collected on pollution trends, as those in the appendices appear to be quite patchy (and unaccompanied by explanations of methodology).</p> <p>Personally, I am very worried about air pollution. I live on Southampton Way, which has become very much worse in terms of traffic and pollution in the last few years, with commuting motorists using it and Parkhouse Street as a rat-run and spending quite a lot of time idling outside my flat when this causes congestion. This seems particularly unfair as few people living here run cars of their own. I myself do not and could not afford to if I wanted to.</p> <p>Finally, I would like to suggest that council employees are strongly encouraged to become ambassadors for the air quality policy. It is disheartening for residents to see council vehicles sitting with their engines running, or large numbers of employees taking the bus a single stop from the Tooley Street offices to London Bridge station. The real effects of these actions on pollution will of course be negligible, but if we want to improve our environment I really feel there will need to be a collective will to do so, and behavioural change from all of us. This can easily be undermined by anger towards 'the council' or a perception of unfairness.</p>	<p>The Council has a legal duty to report its progress against its air quality action plan. This report is submitted to the GLA every April for peer review and is published on the Authority's webpage</p> <p>This comment will be passed to Transport Policy</p> <p>The running of engines whilst parked is not in accordance with policy if the details of the vehicle are reported to the authority, appropriate action will be taken against the driver</p>
R11	Disappointing. This is a weak document focussing in behaviour change that will have limited impact. I would suggest that after a 6 month educational campaign FPNs must be issued to all drivers with idling engines and numbers recorded. I cycle past numerous schools every day and this is a massive problem, especially outside schools (including my son's school and private and state schools). The issuing of FPNs will make it more socially	Several measures with the action plan (measure 4 – 19 to 4 – 21) deal with idling of vehicles and new measures 4 – 25 to 4 – 28 have been introduced in respect of air quality around schools

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	<p>unacceptable than an educational campaign as it is so hard to get the message out there.</p> <p>In addition, all Southwark contractors must sign up to a pledge (similar to the London Living Wage) and be fined if contractors are issued with FPNs (an Interserve van sits with an idling engine for an hour every lunch time on Dulwich Wood Avenue and Interserve have not responded to my complaints). They don't take it seriously even though they have a contract with Southwark, there is nothing to stop them polluting unnecessarily and making the air so toxic.</p>	<p>The running of engines whilst parked is not in accordance with policy if the details of the vehicles are reported to the authority, the appropriate action will be taken against the driver if the Interserve employee is associated with a Council Contract</p>
R12	<p>The Air Quality Strategy is too timid, and the Action Plan is not fit for purpose:</p> <p>Objectives – There are no overarching objectives and targets to reduce NO₂, PM_{2.5}, PM₁₀ and greenhouse gas emissions;</p> <ul style="list-style-type: none"> • Action Plan: some actions do not have due dates, and/or fully defined targets against which achievement or otherwise of the action and objective can be truly assessed; • Action Plan: some actions do not have any indication of resource requirements, against which an assessment of likelihood of effectiveness can be made; • Monitoring Air Quality: lacks an objective regarding a minimum proportion of the population that is aware of episodes of high pollution, and minimum proportion of local population aware of chronic high pollution in their area; • Reducing Emissions from Delivery and Servicing: FORS Gold Standard should be set; • Reducing Emissions from Delivery and Servicing: deliveries during daytime should be restricted or banned on chronically polluted streets, and should be applied during episodes of high pollution; • Reduction of carbon emissions: targets should be 100% (zero carbon). On-site minimum reduction should 80%. 	<p>The proposed Air Quality Action Plan is comparable to other leading Local Authority Air Quality Action Plans. The overarching objective to meet the air quality standards is in the Strategy</p> <p>Targets have been included in the Action Plan</p> <p>The air quality action plan has been reviewed to ensure that the measures can be achieved where resources are available</p> <p>Measure 3 – 6 is aimed to increase public awareness of air quality forecasting and information regarding air quality in their area is available via our website</p> <p>Measure 4 – 5 is promoting the combination and rationalisation of deliveries using low or zero emission vehicles and local distribution hubs in the north of Southwark</p> <p>The authority is presently consulting on its Kerbside Strategy and is exploring a freight consolidation solution for the Borough</p> <p>The reduction of carbon emissions are a national standard and measure 5 – 19 promotes best practice for the design to reduce emissions to air</p>
R13	<p>Congestion at Rotherhithe tunnel pollutes my neighbourhood. You should apply a toll for using the tunnel at any time and high occupancy vehicle rule, requiring at least 2 passengers per vehicle, at peak hours, there and to cross other bridges in London.</p>	<p>The Rotherhithe Tunnel is the responsibility of TfL, comments to be passed to TfL</p>
R14	<p>All good ideas, but how about introducing traffic free days on Sundays on main roads. They have done this in Bologna and other cities throughout Europe.</p> <p>Also free transport days - I think Paris did this</p>	<p>Noted. GLA control the TRN main road network</p>

	Comment	Response
	recently.	
R15	<p>I live on Consort Road, very close to the A202, and a busy road into Peckham town centre. I do not own a car, and yet am forced to breathe illegal air produced in large part by car drivers (both individuals and those in private hire vehicles). It's unfair and frankly disappointing. A minority of people in Peckham own cars, and yet we all suffer from car users' desire to drive them around. This strategy is frankly disappointing, in that it doesn't tackle one of the key sources of air pollution. In my view, there are two key areas in which the strategy could be strengthened:</p> <p>Reducing car trips</p> <p>The data shows that cars, especially diesel, are a significant contributor to atmospheric pollutants. Yet there is nothing in this strategy about reducing the number of car trips - both private individuals and private hire - in the borough. Warm words about 'encouraging' active travel and 'reducing emissions from transport' are frankly worthless without Southwark council taking action to make driving more difficult. Councils such as Waltham Forest have lobbied TfL for Mini Holland schemes, which are already proving successful in reducing the number of car trips. Southwark council should take visionary action to clean up the air in Peckham by banning free car parking, enforcing the speed limit (which is routinely exceeded), and closing roads to through traffic wherever possible. The fact that it is possible to drive a private vehicle down an extremely busy stretch of Rye Lane is frankly ridiculous, and contributes to wilfully poisoning many Southwark residents.</p> <p>Investing in proper walking and cycling infrastructure</p> <p>The roads around Peckham town centre are a disgrace. No separated cycle tracks, no enforcement of the speed limit, limited cycle parking, bad road surfaces, a lack of safe crossings on major roads. All of this adds up to making cycling into Peckham town centre an unattractive prospect. No amount of 'promotion' of cycling will overcome the fact that it is not a very nice experience. It is within Southwark's gift to improve this situation. More walking and cycling trips = less air pollution.</p>	<p>Noted</p> <p>The authority cannot directly ban diesel vehicles as this a national Government function, however the authority will be reducing the number of diesel vehicles in its fleet, with the procurement contract, reviewing the charges for on-street and estate parking to promote the use of less polluting vehicles (New measures 4 – 22 and 4 – 23). Reducing parent and carer parking close to primary schools (New measures 4 – 25 and 4 – 26) and promoting the use of car clubs.</p> <p>The most significant source of pollution on Rye Lane is the buses and delivery vehicles</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. We are currently consulting on the Kerbside Strategy</p>
R16	<p>The pollution levels are very high. Car Drivers going to the Grafton Dance Centre on Village Way sit outside waiting with their car engines running creating pollution.</p> <p>Village Way is a safer route to school and with 8 local schools the pollution level like the rest of</p>	<p>Measures 4 – 18 to 4 – 21 are dealing with vehicle idling thorough campaigns and enforcement</p> <p>New measures 4 – 24 & 4 – 25 has been included to reduce parent &</p>

	Comment	Response
	<p>Southwark very bad.</p> <p>The action plan is a good thing. There was an Air Pollution monitor attached to a lamp post on Village Way but this has now been removed?</p>	<p>carer parking close to primary schools</p> <p>The NO₂ Diffusion tube on the lamp post in Village Way is still present</p>
R17	<p>We live near a shopping centre and would like to see much more intervention from SC to protect residents in our block (directly opposite Butterfly Walk Arcade and the loading bay) from the constant traffic entering the loading bay serving Butterfly Walk. Juggernaut trucks, traffic from 5.30-midnight, management facilities/ services operating on the buildings often park outside our building with engines running for lengthy periods which impacts detrimentally on our health especially in the summer when windows are open mere metres from the running engines.</p> <p>A robust system needs to be in place to address this issue. We need to be more protected by SC.</p>	<p>Measures 4 – 18 to 4 – 21 are dealing with vehicle idling thorough campaigns and enforcement</p> <p>If there is excessive fume from commercial premises the Authority's Noise and Nuisance team can be contacted to investigate</p>
R18	<p>Good detailed plan, however it is vital to turn the points into action as soon as possible. I am afraid a lot of the points will take time to get implemented. In particular removing diesel vehicles from the already congested zone 1 (congestion charge zone) is critical. Another important point is to create more areas without (or minimal) through traffic to improve the air quality around. This is something that can be done through significantly more aggressive traffic management, such as implementation of Quietways, removing through traffic in different areas and making it more difficult for motorized traffic to get around.</p>	<p>The London Mayor is introducing the "£10 T-Charge" for pre 2006 vehicles to enter the congestion zone from 23rd October 2017, the authority is supporting the London Mayor to extend the proposed Ultra Low Emission Zone to the South Circular road with a view to extend it to the M25 in the future.</p> <p>The authority is committed to the cycling Quietways in the Borough</p>
R19	<p>There doesn't seem to be anything about planting extra trees and air filtering plants. The regeneration has concreted over so many previously planted areas, and the replaced trees are building friendly not nature, and environmentally friendly ones. If you were serious about making air quality better you would be adding grass verges not putting down box parks. St. Georges Circus wouldn't have lost all its plants. The Elephant roundabout would still be grassy and have privet hedges on it. The area by the new Pret would have grass and leafy green plants. It is long past, but the old Elephant roundabouts and the area by Pret used to be massive flower beds.</p> <p>You wouldn't be building solidly along roads that were previously open, creating corridors of traffic fumes, as you did along Wyndham Road with the new school building, which now concentrates exhaust fumes into the living rooms and bedrooms of ALL the flats opposite it... which had been there decades before the new school plans were drawn up.</p> <p>Just a few simple things you could easily have thought about already and I am pretty sure were pointed out at times where a fix would have been simple and at least some bad health prevented.</p>	<p>New measure 6 – 4 Increase the amount of green infrastructure in the borough, has been included</p> <p>The authority is involved with the MAGIC project – "Managing Air for Green Inner Cities" this is a research project with South Bank University regarding the migration of pollutants from outdoors into buildings to better. The aim of our involvement is to better inform planning controls & policy in the future</p> <p>Noted</p>
R20	<p>There is quite a lot I agree with, BUT the strategy lacks specificity and daring.</p>	<p>Noted</p>

	Comment	Response
	<p>I cannot see anything about (a) reducing the total volume of motorised traffic in the borough or (b) about developing a network of free/low pollution footpaths and cycle ways for those of us (e.g. the elderly with heart conditions), who need to move around the borough.</p> <p>Boris Johnson's strategy was to advise us to walk on the inside of the pavement. I accept that this strategy goes much further, but I there is insufficient detail about geographical priorities e.g. Borough High Street, Rye Lane, Camberwell, Rotherhithe Tunnel.</p> <p>In addition, too many of the current cycle ways use existing roads: you need to be blocking off as many roads as possible as part of the policy of developing a completely new network of cycle ways/footpaths right across the borough (and London).</p>	<p>The action plan encourages resident to walk and cycle in the Borough. The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. We are consulting on the Kerbside Strategy currently</p> <p>Measures 7 – 1 to 7 – 5 target the improvements in the GLA Air Quality Focus Areas, which cover the areas mentioned</p> <p>The comment will be passed to Transport Policy</p>
R21	<p>The plan is not strong enough. It does not give details of the actions the council will take. It does not give timescales, goals or details of how improvements will be measured. I am gravely concerned this is mere lip service to the issue - the council need to have goals that are objective and they can be held accountable to.</p> <p>I live in an area that is breaching the limit for pollution. The fact that that is allowed to occurred is ludicrous. I cycle, and I cannot see enough being done to improve cycling infrastructure. Whilst cycling, I encounter pollution from cars - you don't appear to have mentioned diesel emissions - this needs to be tackled.</p>	<p>Time targets have been added to the revised action plan</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy. Diesel emissions are being addressed though measures regarding parking, idling and support for the ULEZ</p>
R22	<p>This consultation response is on behalf of the London Cycling Campaign, the capital's leading cycling organisation with more than 12,000 members and 40,000 supporters. The LCC welcomes the opportunity to comment on plans. The response is in support of the response from Southwark Cyclists, the borough group, and was developed with input from the co-chairs of LCC's Infrastructure Review Group.</p> <p>LCC is a member of the Healthy Air Campaign, a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London and the UK's air.</p> <p>London's air quality not only continues to breach EU legal limits, it's much worse than the standards called for by the World Health Organisation. Almost</p>	<p>Noted</p> <p>Noted</p>

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<p>10,000 Londoners die prematurely every year as a result of air pollution. Almost a quarter of primary schools are sited in areas that breach the legal limit for nitrogen dioxide (NO₂). Doctors report that children spending their early years in parts of the city are suffering serious, long term or permanent impacts to their health and development. London's dirty air also costs the economy £3.7 billion. It's an unacceptable situation.</p> <ul style="list-style-type: none"> • LCC generally supports Southwark's strategic aims of: <ul style="list-style-type: none"> ○ Management of Air Quality ○ Reduce Emissions from Buildings ○ Public Health and Awareness ○ Cleaner Transport ○ Reducing Carbon Emissions ○ Regulation & Enforcement ○ Support the GLA Air Quality Aims ○ Support Public Health <p>However the current Strategy and Plan does not go far enough. Given that motor vehicles are a major source of pollutants, the promotion of shift to active travel (cycling and walking) must be given greater priority and be one of Southwark's Strategic Aims. Creating an environment where cycling is a choice for any Londoner, who wants to ride the streets conveniently and without fear, is critical to improving air quality.</p> <p>Key actions to achieve this are:</p> <ul style="list-style-type: none"> • Creation/completion of a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic to/from all key destinations and residential areas in an area. This network will include both physically-protected cycle tracks on main roads with safer junction designs that separate those who cycle from turning motor vehicles etc. It will also likely include quieter routes along streets or through areas that feature low traffic volumes and speeds. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset. • The planned cycling and walking networks should be developed based on demand/potential for both modes and new planning applications should be required to be compatible with this. • Quality of all Highways work (not just cycling schemes) should be assessed via TfL's London Cycling Design Standards (LCDS), with an aim for a Cycling Level of Service (CLoS) rating of 70 or above, with all "Critical Fails" eliminated. And all Highways work should be designed both to 	<p>Noted</p> <p>Noted</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy. We are consulting on the Kerbside Strategy currently</p> <p>This comment will be passed to Transport Policy</p> <p>This comment will be passed to Transport Policy</p> <p>This comment will be passed to Transport Policy</p>

	Comment	Response
	<p>accommodate growth in cycling and not to increase motor traffic. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use while minimising impact on air quality, walking, cycling, then public transport are key.</p> <ul style="list-style-type: none"> • On certain streets in areas of high congestion, motor vehicle traffic should be removed some or all of the time (although the default should be to continue to enable cycling). As well as this, restrictions to certain types of vehicles should be considered to restrict their route choice. • Reducing parking, waiting and loading areas, and road capacity and through routes will encourage modal shift and create more space for cycling and walking infrastructure. • As well as encouraging modal shift for private motor vehicle use, commercial motor vehicle movements should be reduced wherever possible. And wherever possible, companies should be encouraged to operate outside of peak hours to reduce congestion. For instance, occupiers of large commercial buildings should be should generally be required to only accept deliveries outside peak periods (including potentially at night); medium-sized commercial buildings should be required to provide off-street servicing areas and the feasibility of shared service areas for smaller businesses should be considered; enforcement against illegal waiting, loading, idling etc. should be maximised; consolidation should be encouraged (including by cooperating with neighbouring boroughs to create consolidation centres); personal/internet deliveries to offices should be discouraged in the borough, with consolidation alternatives (“click and collect” etc.) encouraged; “last mile” alternatives to commercial motor vehicles should be explored and encouraged (cargo bike, river freight etc.). • New residential developments should be ‘no car’ as a default. And Section 106 and CIL funding from new developments should be used to improve conditions for cycling and walking. Planning for new developments should consider and prioritise space for cycling and walking within the development. • Requirements for cycle parking in developments should be increased above London Plan (consideration for cycle 	<p>This comment will be passed to Transport Policy</p> <p>The authority is currently consulting on the Kerbside Strategy</p> <p>As an extension to Measure 4 – 2 Developing a freight consolidation solution for Southwark, the current Low Emission Logistic project, of which the authority is a partner is working with business’s to explore the opportunities to use the consolidation solution</p> <p>Depending on the location of the development, planning policy determines the parking provisions. Many locations in central areas and good public transport are no car by design with minimal parking for those with disability</p> <p>This comment will be passed to</p>

	Comment	Response
	<p>parking should include residents, workers, visitors to both ground floor and upper floor businesses, and include provision for a wide range of cycles e.g. hand cycles, cargo bikes). Requirements for showers and changing facilities where appropriate should also be implemented. And incentives such as rate rebates should be considered for businesses that achieve high levels of cycling by employees and/or suppliers.</p> <ul style="list-style-type: none"> • More public cycle parking is required across Southwark also – and Southwark should plan for this. <p>Southwark should set ambitious and measurable targets that it then strives to achieve (and can be held to account on) for all major commitments within the plan – with deadlines etc. attached. As examples, these targets should include: a percentage reduction in the children driven to school and correlated increase in the percentage that walk or cycle to school; a percentage decrease in council staff parking and car use; and also a percentage decrease in all-borough car parking spaces and car use/“modal share”.</p>	<p>Planning Policy</p> <p>This comment will be passed to Transport Policy</p> <p>Time targets have been added to the Action Plan. The plan has been reviewed to ensure there are measureable outcomes</p>
R23	<p>Totally inadequate, indeed illegal:</p> <ul style="list-style-type: none"> * According to 2015 Defra figures, Southwark has the highest numbers of death from air pollution overall in London. * The consultation draft is just a rehash of a previous, inadequate plan that has not been effective. * The measures proposed are not SMART (Specific, Measurable etc.), so there is no prospect of checking progress and adopting more ambitious measures if needed. * Proposals to encourage walking and cycling - without locking in demand - will lead to more not fewer deaths from poor air quality. In a congested city like London, any space freed up will induce additional motor traffic, unless it is reallocated to zero emission travel. Although measures proposed by the Mayor of London would reduce NO_x - though still not enough around areas like London Bridge with high exposure - they would fail to have a significant impact on particulates. The majority of vehicle related particulates in central London come from tyre and brake wear. <p>Additional measures are needed including:</p> <ul style="list-style-type: none"> * adopt motor traffic reduction targets for whole borough, to feed into the New Southwark Plan and Local Implementation Plan * restrict through private motor traffic during peak hours through filtered permeability measures (e.g. Portland St, Camberwell Grove and through Bellenden area) and lobby TfL to do same on Borough High St and Tooley Street, following example of City of London scheme at Bank being 	<p>Noted</p> <p>Timelines have been added to the Action Plan and reviewed to ensure it is SMART.</p> <p>The Authority has recently announced that over the next five years we will be investing over £30m and launching the Southwark Cycling Strategy</p> <p>These comments will be passed to our Traffic Policy and Highway teams</p>

	Comment	Response
	<p>introduced from April 2017</p> <ul style="list-style-type: none"> * introduce parking permit schemes on 100% of borough roads, with fees graded according to pollution levels. * remove free parking and increase fees to fund better conditions for walking & cycling. * introduce access only areas (e.g. through pedestrian zone signage), where deliveries can only be made by permit holders, with permit holders required to use zero emission vehicles. * restrict use of road humps, instead use wider range of traffic calming measures: Southwark currently plans to increase road humps, e.g. on Quietways, increasing air pollution contrary to EU law. Road humps double air pollution by encouraging braking. * educate owners of wood burners about ways to reduce particulates from better usage techniques. 	<p>New measures (4 – 22 and 4 – 23) have been included to review the car parking charges to promote use of less polluting vehicles.</p> <p>This could be a proposal as part of the new research to reduce motor vehicles in the north of the Borough sees measure 4 – 29 to 4 – 30</p> <p>Comment will be passed to the Highways</p> <p>A campaign is being designed as Measure 2 – 3</p>
R24	<p>"Ensure all sectors of the population in the Borough have awareness of the anti-idling legislation." Raising awareness is fine, but how are you going to enforce the legislation? I live next door to a fleet of 50+ diesel vans (not by choice - they moved in on a short-term lease after I bought my property). They routinely leave vans with the engine idling. When I challenged them, their argument was that it's cheaper to leave an engine running than to turn it off then on again! They'll continue to do it unless there's some sort of penalty.</p> <p>"Encourage residents to walk or cycle in the Borough - Promote active travel through relevant public health work streams and services including physical activity and healthy weight." This is allocated to your public health team. But I think you need some joined-up thinking - surely this involves other teams, because you need to deal with cycling infrastructure. For example, how about setting a target to provide more on-street bike lockers? Finding space to store bikes in small inner-London homes is a challenge. I've been trying to get one installed in my road, but making no progress.</p> <p>More broadly, I hope the strategy and plan are properly rolled out across all your departments, and that staff are briefed about their importance and relevance. I recently asked the council about air quality monitoring in my area (because of my concerns about the diesel fleet next door). After chasing repeatedly for a response, my request eventually ended up with the planning team rather than the environmental team, and seems to have disappeared into a black hole.</p>	<p>A campaign is being designed as Measure 4 – 18. Vehicle idling legislation is only applicable on the public highway. It's not cheaper to keep a vehicle engine running. A visit to the company will be made from an officer of the Environmental Protection Team</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy</p> <p>The authority is presently consulting on its Kerbside Strategy, the comment will be passed to the Transport Policy Team</p> <p>A visit to the company will be made from an officer of the Environmental Protection Team</p>
R25	<p>The plan is rather too general & timid, lacking details, time table, imagination and commitment.</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures. Timelines have been</p>

	Comment	Response
	<p>I would like to see :</p> <ul style="list-style-type: none"> • wider provision of protected cycle lanes and quiet-way routes throughout Southwark, • offering cycle training for all primary school children, • phasing out diesel, • increasing speed of eliminating diesel by converting council fleet to Liquefied Petroleum Gas (LPG) and by providing full/partial grants to conversion to LPG for cars bought by qualifying borough users during last 3-5 years • enforcing no-idling, • more street trees, shrubs, green walls and roofs, • insulate all council properties including schools and estates and promote the use of renewable energy by installing renewable energy technologies • insist that all new buildings and constructions are carbon neutral and equipped with renewable energy technologies • use new technologies to improve air quality, such as <ul style="list-style-type: none"> ○ Catalytic Clothing surfaces used by Sheffield University (http://www.airqualitynews.com/2014/05/14/giant-simon-armitage-poem-used-to-cut-no2-pollution/) ○ Air-purifying billboards used by UTEC Lima, capable of purifying 3.5 million cubic feet of urban air daily, especially suitable at construction sites, (http://innovatedevelopment.org/2014/05/19/perus-innovative-air-purifying-billboard) ○ Rooftop outdoor 'vacuum cleaners' by Envivity Group, capable of pulling in 80,000 cubic meters (2.8 million cubic feet) of air per hour, reaching 300 m (984 ft.) around it and 7 km (4.3 miles) directly upwards (https://envivitygroup.com/). 	<p>added to the Action Plan</p> <p>Comment will be passed to Authority's Transport Policy and Highway sections</p> <p>Cycle training in offered to all Year 4 & 5 primary school students, the offer is either accepted or rejected by the school</p> <p>This is a Government policy decision</p> <p>The Council fleet is being renewed with the preferred new vehicles either being electric or petrol if the operational requirements are met, The Government provide full /partial grants for alternative fuel vehicles.</p> <p>Measures 4 – 18 to 4 – 21 deal with enforcement of anti-idling</p> <p>New measure 6 – 4 “Increase the amount of green infrastructure” in the borough has been included.</p> <p>Measures 5 – 7 to 5 – 17 deal with energy saving and renewable energy sources in Council properties</p> <p>Measures 5 – 18 and 5 – 19 ensure new developments minimise their impact on local air quality and climate change.</p> <p>Noted</p>
R26	<p>We strongly believe that the plan does not do enough for air quality. There are no details of the actions the council will take and there are no timescales, goals or details of how improvements will be measured. So it is not a plan but an apology for not having one.</p> <p>We are concerned about the early deaths (more</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures. Timelines have been added to the Action Plan</p>

	Comment	Response
	<p>than 9,000 a year) and the ill health caused by exacerbated asthma, heart and lung disease.</p> <p>And we are disgusted by the thought that a whole generation of Southwark cyclists and their children are going to suffer life-long consequences of growing up in a soup of nitrogen dioxides and particulate matter. A 10% permanent reduction in children's lung development will cause them to find cycling more difficult and complex health problems later in life.</p> <p>Why should health advice suggests that children and older people reduce their physical activity? Generally the fitter you are the less damage pollution does to you.</p> <ul style="list-style-type: none"> You should be taking real, measureable substantial steps to cut air pollution - and soon. 	<p>Noted</p> <p>Noted</p> <p>The health advice during pollution episode is balanced to take account the benefits of physical activity against the effects of air pollution on the vulnerable and those with compromised health</p> <p>Noted</p>
R27	<p>The plan is not strong enough. It does not give details of the actions the council will take. It does not give timescales, goals or details of how improvements will be measured.</p> <p>I am very concerned about the early deaths (more than 9,000 a year) and the ill health caused by exacerbated asthma, heart and lung disease.</p> <p>I am horrified at the thought that a whole generation of Southwark children are going to suffer life-long consequences of growing up in a soup of nitrogen dioxides and particulate matter. A 10% permanent reduction in children's lung development will cause complex health problems later in life.</p> <p>I am angry that health advice suggests that children and older people reduce their physical activity. This may be the right response to the immediate emergency of a pollution episode but it is disastrous in terms of wider public health goals to reduce obesity and promote physical and mental health.</p> <p>I call on Southwark Council to take real, substantial steps to cut air pollution</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures. This action plan is comparable. Timelines have been added to the Action Plan</p> <p>Noted</p> <p>Noted</p> <p>The health advice during pollution episode is balanced to take account the benefits of physical activity against the effects of air pollution on the vulnerable and those with compromised health</p> <p>Noted</p>
R28	<p>Great that Southwark is developing a strategy and action plan but given the impacts I would like more to be done.</p> <p>Based on a word search for example, the word 'diesel' doesn't even appear in the document. But action on diesel is surely the most important thing. Why not follow Westminster and institute differential pricing on parking etc.</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures</p> <p>New measures 4 – 22 and 4 – 23 have added to review variable vehicle parking charges to promote use of less polluting vehicles</p>

	Comment	Response
	<p>And at the least commit to phasing out all diesel vehicles from Southwark's fleet.</p> <p>On cycling and walking, I would like to see more too, e.g. on unsafe junctions and quiet ways.</p> <p>And what about specific , building on the mayor's recent initiative (tackling idling, illegal parking, closing off streets to traffic etc.)</p> <p>When you focus on "encouraging" people to walk and cycle, rather than addressing infrastructural barriers and tackling model shift issues, I think you are unlikely to deliver the results needed . Plus pollution indices regularly warns against exercise, so I think this points to starting the other end, by reducing the factors that cause the pollution</p>	<p>The Council fleet is being renewed with the preferred new vehicles either being electric or petrol if the operational requirements are met</p> <p>Comment passed to Transport Policy & Highways</p> <p>There several measures within the action plan supporting the London mayor's initiatives and enforce anti-idling legislation</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy</p> <p>Only the vulnerable and those with already compromised health are advices to reduce physical activity during poor air quality episodes. We are currently consulting on the Kerbside Strategy</p>
R29	<p>The council needs to outline the steps it intends to take – the current plan lacks any details of its targets or programme of action.</p> <p>This is a public health emergency. High levels of pollution in the borough are particularly damaging to children's health, affecting lung development and potentially leading to serious health problems in later life. With obesity on the rise, it is unacceptable for the council to advise that children should be discouraged from physical activity.</p> <p>On a personal level - as someone who has been diagnosed with mild persistent asthma since living in Southwark - I would like the council to act now to reduce vehicle emissions, by installing free charging points for electric vehicles, launching a public information campaign to promote the use of car clubs, creating more car-club parking, and ending any provision of additional parking for private, non-commercial use (except for disabled drivers). Developers (for example, at Elephant Park) should not have been allowed to add new car-parking spaces in breach of the council's own planning policies - the council needs to learn from past mistakes.</p>	<p>Timelines have been added to the action plan</p> <p>The health advice during pollution episode is balanced to take account the benefits of physical activity against the effects of air pollution on those who are most vulnerable</p> <p>Measure 4 – 1 is promoting the use of alternative fuels, and a new measure 4 – 31 has been added to promote the use of car clubs in Southwark</p> <p>Noted</p>
R30	<ol style="list-style-type: none"> 1 Great news, making Southwark own vehicles less polluting 2 Communication campaigns will cost too much money the council does not have. Volunteers should be used to spread the word 3 Air focus areas are spaces of very high pollution. Area of focus should be more widespread! 	<p>Noted</p> <p>The campaigns will be resourced from existing departmental budgets or from grants</p> <p>The action plan covers the whole Borough, however there is a requirement to reduce the pollution concentration in the air quality focus areas</p>

	Comment	Response
	<p>4 Boiler impact: The effect of boilers is so marginal. Gas heating is an economic way of heating a house or a flat. Changing this will be put at a disadvantage poorer families or old people who will not have the money to pay for a more expensive source of fuel. This should not be in scope</p> <p>5 What other source of fuel will be used? Electric cars and vans? Electric radiators? Electricity is far from being green, since there is a high reliability for electricity on nuclear power stations. Also, with Brexit, and UK leaving Euratom, there are talks this will be delaying nuclear power station construction. This means reduced electricity supply, for an increased consumption. There will not be enough electricity for all (businesses, councils and residents).</p> <p>6 Consolidation of deliveries. That sounds good in theory, but in practice, this will not work. With less cars and people cycling and walking more, this change in behaviour will multiply the number of home deliveries. Not from same courier. Consolidation will be unmanageable.</p>	<p>The efficient of the gas boilers is reduced with age of the boiler, but also depends on the maintenance of the boilers, the installation of the ultra-low NO_x boilers will help residents to reduce their energy bills, because the boilers are more efficient</p> <p>The authority is committed to reducing fuel poverty in the Borough.</p> <p>The sourcing of electricity is outside the scope of this Action Plan</p> <p>The measure 4 – 5 is promoting sustainable logistical measures in the north of the Borough by using low or zero emission vehicles. If successful this can be expanded to the rest of the Borough in future. WE have already run campaigns to encourage click and collect rather than home delivery for on-line shopping purchases</p>
R31	<p>I'd like to see more action overall; and I'd like to see you suggest / help Southwark residents lower their emissions.</p> <p>Increasing and improving bike infrastructure and helping get people on their bikes would be a great way of doing the latter!</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered and this action plan is comparable</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy</p>
R32	<p>The targets in the plan are not nearly strong enough. There is no sense of a belief that the actions listed will achieve very much. Why, given that this is a health emergency that needs to be tackled, is there no sense that emergency action needs to be taken?</p> <p>Why not a commitment to move all of your fleet to electric vehicles, for example? And a requirement that contractors do likewise, if they want to be contracted by the Council?</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered and this action plan is comparable</p> <p>The Council fleet is being renewed with the preferred new vehicles either being electric or petrol if the operational requirements are met, The Government provide full/partial grants for alternative fuel vehicles</p>

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London Borough of Southwark

Inspection of services for children in need of help and protection, children looked after and care leavers

and

Review of the effectiveness of the Local Safeguarding Children Board¹

Inspection date: 6 March 2017 – 30 March 2017

Report published: 13 June 2017

Children's services in Southwark are good	
Children who need help and protection	Good
Children looked after and achieving permanence	Requires improvement
2.1 Adoption performance	Outstanding
2.2 Experiences and progress of care leavers	Requires improvement
Leadership, management and governance	Good

¹ Ofsted produces this report under its power to combine reports in accordance with section 152 of the Education and Inspections Act 2006. This report includes the report of the inspection of local authority functions carried out under section 136 of the Education and Inspections Act 2006 and the report of the review of the Local Safeguarding Children Board carried out under the Local Safeguarding Children Boards (Review) Regulations 2013.

Executive summary

Children's services in Southwark are good overall. Leaders and managers understand the strengths and areas for development of their service well. Southwark attracts experienced, high-quality social workers who are keen to work in small units that employ systemic methods, under the 'social work matters' initiative. This model, launched in 2014, is well established. The model is well resourced and features clinical and group supervision alongside manageable caseloads. This promotes influential and effective direct work with children and families. The model is enabling a flourishing social work culture in the local authority, equipping social workers to address complex local concerns in this highly diverse community, including serious youth violence, gangs and female genital mutilation.

The local authority continually strives to improve, developing innovative services which are informed by children's participation and involvement. This shapes the design of adaptable and flexible services and improves outcomes for children. High-quality management oversight is not yet consistently good across all parts of the service. The local authority has recognised this shortfall and is working quickly to ensure that all social workers receive good-quality management oversight, support and challenge.

The majority of children and families in Southwark are helped through carefully designed services. The multi-agency safeguarding hub (MASH), formed of 20 agencies, is effective in responding to cases when children are at risk of harm, although managers' decisions on referrals are not consistently completed within the required 24-hour period. There are also missed opportunities to involve all relevant partners in child protection strategy discussions.

Younger children who have emerging and additional needs are helped through an extensive range of services clustered around children's centres. Targeted early help for some younger children who have more substantial difficulties is helpfully focused on their educational needs, but would be further strengthened by a more holistic response to a wider range of difficulties affecting their lives at home. However, there are strong early help services for older children, helping families and children to improve their lives and preventing the need for subsequent statutory social work involvement.

Assessments of children's and families' circumstances identify the major difficulties facing children and their families. This results in focused child in need or child protection plans for most children, which contribute to reducing risk. Southwark and its partners have particular strengths in identifying and protecting young women at risk of female genital mutilation, honour-based violence, bullying or sexual exploitation through gang associations. Women who have experienced earlier multiple removals of their children through care proceedings are helped to change radically the subsequent direction of their lives through a highly successful, award-winning project called 'Pause'.

The local authority engages constructively with families with children for whom there are serious safeguarding concerns in the pre-care proceedings stages of intervention and prevents the majority from subsequently entering care. Social workers produce timely and well-constructed evidence when care proceedings are necessary.

The local authority has developed strong, creative and adaptable multi-agency partnership responses to address child sexual exploitation and other risks to adolescents, such as knife crime. Children who go missing from home or care are closely tracked, although return home interviews are not regularly completed and, when they are, the information obtained to help to prevent further missing episodes is not always of good quality.

Senior managers are aware that too many children in care, especially older children, have too many placement breakdowns that are, in many cases, the result of poorly planned and matched placements. Early adoption permanence planning is strong, but there are delays in achieving permanence for too many children in long-term fostering arrangements.

The quality of management oversight for children in care is not sufficiently challenging to improve outcomes for all children. This is further inhibited by many children in care having too many changes of social worker, preventing them from establishing strong relationships built on professional trust.

Many care leavers live in safe, suitable housing and achieve good outcomes in their education, employment and training. Some young people are not fully informed about the support and entitlements that would help them, even if they are doing well at college or university.

The local authority has a well-established culture of identifying children at the earliest stage of their difficulties, who might go on to be adopted, and carefully tracks and promotes adoption or other forms of legal permanence as soon as possible. Adopters highly appreciate the assessment, training and support that they receive from knowledgeable and dedicated social workers.

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The local authority

Information about this local authority area²

Previous Ofsted inspections

- The local authority operates one children's home, which was judged to be good in its most recent Ofsted inspection. This is a short-breaks service, which is registered as a five-bedded children's home.
- The previous inspection of the local authority's safeguarding arrangements was in May 2012. The local authority was judged to be good.
- The previous inspection of the local authority's services for children looked after was in May 2012. The local authority was judged to be good.

Local leadership

- The strategic director of children's services (DCS) has been in post since October 2014.
- The DCS is also responsible for adults' social care services.
- The chief executive has been in post since July 2012.
- The chair of the LSCB has been in post since May 2013.
- The local authority uses the systemic and signs of safety models of social work.

Children living in this area

- Approximately 62,000 children and young people under the age of 18 years live in Southwark. This is 20.3% of the total population in the area.
- Approximately 28.2% of the local authority's children aged under 16 years are living in low-income families.
- The proportion of children entitled to free school meals:
 - in primary schools is 19% (the national average is 15%)
 - in secondary schools is 29% (the national average is 13%).
- Children and young people from minority ethnic groups account for 65% of all children living in the area, compared with 22% in the country as a whole.
- The largest minority ethnic groups of children and young people in the area are Black African and Black Caribbean.
- The proportion of children and young people who speak English as an additional language:

² The local authority was given the opportunity to review this section of the report and has updated it with local unvalidated data where this was available.

- in primary schools is 46% (the national average is 20%)
- in secondary schools is 36% (the national average is 16%).

Child protection in this area

- At 28 February 2017, 2,694 children had been identified through assessment as being formally in need of a specialist children's service. This is a reduction from 3,339 at 31 March 2016.
- At 28 February 2017, 327 children and young people were the subject of a child protection plan (a rate of 52 per 10,000 children). This is an increase from 284 (45 per 10,000 children) at 31 March 2016.
- At 28 February 2017, 35 children lived in a privately arranged fostering placement. This is an increase from 21 at 31 March 2015.
- In the two years before inspection, two serious incident notifications were submitted to Ofsted, and one serious case review (SCR) was completed.
- There was one SCR ongoing at the time of the inspection.

Children looked after in this area

- At 28 February 2017, 510 children were being looked after by the local authority (a rate of 81 per 10,000 children). This is an increase from 475 (75 per 10,000 children) at 31 March 2016.

Of this number:

- 368 (or 72%) live outside of the local authority area
 - 57 live in residential children's homes, all of whom live out of the authority area
 - none lives in residential special schools³
 - 390 live with foster families, of whom 68% live out of the authority area
 - five live with parents, of whom 40% live out of the authority area
 - 32 children are unaccompanied asylum-seeking children.
- In the last 12 months:
 - there have been 18 adoptions
 - 18 children became subject of special guardianship orders (SGOs)
 - 242 children ceased to be looked after, of whom 3% subsequently returned to be looked after
 - 29 young people ceased to be looked after and moved on to independent living

³ These are residential special schools that look after children for 295 days or less per year.

- no young people ceased to be looked after and are now living in houses in multiple occupation.

Recommendations

1. Ensure that prompt decisions are made to safeguard children affected by long-term, cumulative neglect, so that they are not left in adverse home circumstances for long periods.
2. Work with partner agencies to ensure that referrals contain sufficient information and that parental consent has been obtained if necessary, so that management decisions on the required action are timely and families receive help quickly.
3. Ensure that strategy discussions and strategy meetings involve all relevant agencies so that multi-agency information informs assessment of risks.
4. Ensure that return home interviews with children missing from home and care are completed consistently and effectively so that the intelligence gained reduces the recurrence of further missing episodes.
5. Strengthen management oversight of social workers in the children looked after and care leavers' services.
6. Ensure that the sufficiency strategy, supported by effective commissioning, provides a better supply of high-quality placements for children looked after, particularly for adolescents who display challenging behaviours.
7. Ensure that children's care plans are effectively and regularly reviewed to confirm whether their needs are being met through their placements, and establish alternative plans where necessary.
8. Ensure that children looked after who live outside of the local authority area are not disadvantaged through slower access to essential services, particularly child and adolescent mental health services, education support and regular health assessments.
9. Ensure that children looked after are supported to build strong and enduring attachments to their carers through more timely permanence decisions for long-term foster family arrangements. Ensure timely life story work, which is kept up to date.
10. Ensure that all social workers and personal advisers working with young people leaving care have a clear knowledge of their current circumstances. This aim should be supported through consistently effective pathway planning, to ensure that young people understand and receive all their entitlements and that their identified needs are met.

11. Ensure that children are aware of how to complain about services provided to them and that more advocacy support is provided for children on child protection plans and for those who are looked after. Ensure good access to independent visitors for children looked after.

Summary for children and young people

- Most services for children and families in Southwark are good, and adoption services are outstanding. Managers and local politicians are very determined to continue to improve those services that are not yet good, and they have effective plans to do this.
- Most children and families receive good early help, and, when they need protecting, responses are quick. However, some children who have been neglected by their families have had to wait too long to receive help.
- Social workers each work hard with a small number of families to make sure that children and families get the right help at the right time. Most social workers have time to spend with children to get to know them well.
- Southwark is very good at helping young people who face particular difficulties, such as the risk of female genital mutilation, honour-based violence and involvement with gangs and knife crime. Southwark also does some important work with women who have had their children removed from them to avoid the same thing happening again.
- Managers listen to the views of children carefully. For example, young people have helped the local authority to develop better accommodation for care leavers.
- Many young people leaving care are doing well in work, training or further education, but some young people do not know their rights and entitlements as care leavers.
- Some young people who are looked after by Southwark are moved around too much from one placement to another. Managers need to make sure that the right placements are chosen first time around, so that there is no need for them to move again.
- Social workers in Southwark work hard to ensure that there is no delay for children who may be able to be adopted. Children from a wide variety of backgrounds and of different ages are adopted. When they have been adopted, their parents receive good support from the local authority when they need it.

The experiences and progress of children who need help and protection	Good
<p>Summary</p> <p>Safeguarding concerns are recognised quickly as they are referred promptly for assessment and action. A large range of partners are co-located in the MASH, which promotes good communication, information sharing and joint working. The majority of contacts are rapidly screened, although not all management decisions are timely. This is because the quality of information provided by referring agencies is not consistently helpful, and parental consent is not always sought in advance, when required. This means that for some children there is some delay in being seen and assessed.</p> <p>Children and families have access to a good range of targeted early help services, some of which are excellent. Improvements are being made to ensure that all children receive early help in a timely manner, with evidence that an implementation programme is beginning to yield results to achieve this.</p> <p>Children at risk of significant harm are promptly identified and protected. Thresholds are well understood by staff across children’s social care. Child protection strategy meetings and enquiries are timely and take decisive actions to protect children. In most cases, only the police and children’s social care are involved in strategy meetings. As a consequence, not all available information is being considered at the earliest opportunity.</p> <p>The majority of assessments feature a clear focus on children and are informed by their experiences. They inform plans characterised by timeliness and clear actions. Most children benefit from regular and effective reviews of their plans, resulting in purposeful progress that reduces risks to them. Direct work with children is well established in Southwark, resulting in high-quality engagement, which enables children to describe their experiences and concerns powerfully. A high proportion of assessments result in no further social care involvement. However, many are stepped down appropriately to a broad range of early help services. This is not consistent across the whole service. In a small minority, long-term cumulative neglect is not always addressed quickly enough.</p> <p>Arrangements for tracking missing children are effective. Improved responses to children who go missing from home are acknowledged by the local authority as an area requiring further attention.</p> <p>Work with children at risk of child sexual exploitation is effective, reducing levels of risk for many children. Engagement with young women and girls at risk of exposure to female genital mutilation is very strong, with high numbers of notifications and effective work, including the use of court orders, which reduces risks.</p>	

Inspection findings

12. All new contacts concerning children are promptly screened through the MASH. Safeguarding concerns are promptly recognised and passed on quickly for assessment and action. Twenty partners are co-located in the MASH, which has improved communication and joint working. Recent changes have resulted in a consistent core MASH team membership, ensuring good information sharing and effective communication about children and their families. Thresholds are well understood and applied within the MASH and across children's social care. Parental consent, if appropriate, is routinely considered within the MASH and clearly recorded. Screening and triaging of domestic abuse referrals by the police, who are co-located in the MASH, and children's social care are rigorous.
13. In cases considered within the MASH where safeguarding concerns are not readily apparent, many decisions are not completed within the 24-hour target. Timeliness on this aspect has deteriorated in recent months. Regular performance information and a sophisticated live dashboard in the MASH are not being utilised effectively by managers and staff to improve performance and timeliness. Many delays are caused by referrals lacking sufficient information and parental consent. These are most likely for children identified as requiring a child in need assessment. This means that some children who require an assessment of need are not seen soon enough.
14. Out-of-hours arrangements are effective. Interventions are timely and proportionate, and followed up by prompt liaison with daytime staff. Communication and handover are well managed, resulting in continuity for children and families.
15. Work with children at risk of child sexual exploitation is effective, resulting in risks reducing for many children exposed to this danger. Adaptive and creative multi-agency partnerships provide responsive and purposeful approaches to emerging sexual exploitation and other adolescent risks, including knife crime, gangs and honour-based violence.
16. Effective arrangements ensure a robust strategic and operational approach to the identification of child sexual exploitation, prevention, support and disruption of perpetrators. Intelligence is shared well through a strategic multi-agency child sexual exploitation meeting (MASE), operational meetings and a problem profile group. An 'adolescent at risk' meeting is being piloted, which considers multiple risks confronting young people. The child sexual exploitation assessment tool is used well for initial risk assessments, but is used too infrequently to review continuing risks. Constructive joint working has led to informed service developments, such as the youth offending service's gangs team and a child sexual exploitation police team. These initiatives have improved shared intelligence and understanding of risks through an operational child sexual exploitation group. Social workers are kept

up to date on new risks and vulnerabilities about individual children, as well as on specific locations of concern, which assists their preventative work.

17. Work addressing female genital mutilation is particularly strong, with high numbers of notifications and subsequent effective work to reduce risks, including frequent use of court orders. Sensitive community engagement with at-risk communities is evident. Social workers address cultural sensitivities carefully, while remaining risk focused. Children are at the centre of decision-making and child protection plans. Similarly, honour-based violence work is also risk focused and culturally sensitive, with purposeful, child-focused social work. Examples of high-quality direct work with young people facing risks from gangs were seen by inspectors, enabling the young people to powerfully describe their experiences and producing effective interventions to lower risks.
18. Some children do not receive local authority early help in a timely way. Improvements are being made, and an implementation programme is beginning to yield demonstrable improvements. A reorganisation of children's centres is showing early signs of more efficient multi-agency practice and coordination of services. Better-informed targeting of vulnerable groups is providing the right children and families with help. Early help services have developed a more cohesive alignment with children's social care, for example revising their processes and templates to incorporate the same approach to assessments. Services are more needs led and consistent across the borough, utilising both one-to-one and group work to support families. Improved outcomes for children and families are demonstrated through constructive feedback and measures that clearly show how problems and difficulties have substantially reduced.
19. The 'Pause' initiative is an innovative model, demonstrating a positive impact through preventing subsequent care proceedings for women who have experienced repeated removals of their children. The relationship, strength and community-based approach to working with these women are highly valued, resulting in there being no further care proceedings for the women in the 18 months since its inception. No further pregnancies occurred in the last year, alongside improvements in the women's development of positive identities, self-esteem, relationships and enhanced well-being. Contact with their children in care improved, in terms of both reliability and quality.
20. Support provided in four early help locality teams is predominantly school orientated, particularly focused on improving children's school attendance. Some interventions are too parent focused, and children are not always seen sufficiently soon. Delays are apparent in engaging some referred families. Management oversight is not ensuring that children's outcomes are improved. The common assessment framework is underdeveloped and is used by most partner agencies as a referral form rather than as an assessment of children's needs. This leads to some children who have lower levels of additional needs experiencing delays in receiving early help.

21. Children at risk of significant harm are promptly identified and protected. Thresholds are clearly understood and applied by children's social care staff. Child protection strategy meetings and enquiries are timely and result in decisive action to protect children. In most cases, only the police and children's social care are involved in strategy meetings, which results in not all information being considered at the earliest opportunity. Given the number of partners present in the MASH, this is a missed opportunity.
22. Most assessments are completed to a high standard, underpinned by a systemic model of social work that is well established. Assessments are timely and clear, and have a clear focus on children, informed by their experiences. A high proportion result in no further action, but step down to early help services is measured, and appropriate referrals are made to a wide range of agencies. Children's cultural backgrounds and identities are at the forefront of some assessments and interventions, but the impact of ethnicity, inequality and environment on some children is not fully understood. There are limited pockets of the service where assessments are not of a consistently high standard.
23. Most plans are timely and ambitious and have clear, accountable actions. However, this is not consistently the case across the service. The local authority is aware that some practice is not of the standard required, and assertive action has been taken by managers to address performance issues. Social workers effectively engage with family members, addressing presenting and wider needs, and endeavour to involve fathers and male partners, resulting in improved interventions. Child-focused social work results in positive outcomes for the majority of children and families. Long-term, cumulative neglect of some children is not always addressed decisively or soon enough.
24. Plans clearly specify what parents, children and young people need to do to achieve improvements, but some plans could more clearly articulate the outcomes sought by the provision of services. All social workers value weekly systemic group supervision, supported by advanced and clinical practitioners, enabling regular opportunities to share perspectives, analyse, reflect and hypothesise. Reflective and evaluative management supervision in most teams, supported by regular group supervision, results in better decision-making and outcomes for children.
25. Most children benefit from regular and effective reviews of their plans, resulting in purposeful progress and reduced risks. Child protection chairs are confident and escalate issues as necessary, quickly resolving concerns within the children's service and with other agencies. Child in need and core group meetings are also held regularly. However, too few children benefit from the support of an advocate.

26. Children who have disabilities are provided with a good service, co-located with health services for children who have additional needs. Thresholds are applied effectively and, where necessary, safeguarding concerns are escalated appropriately, including subsequent use of the Public Law Outline (PLO). Child protection concerns are swiftly recognised, and involved agencies are appropriately challenged. The completion of assessments and plan objectives for some children is not sufficiently timely. In some cases seen by inspectors, transitions to adult services' provision were characterised by drift in timescales and a lack of management oversight.
27. A range of well-designed services is available to both parents and children. Social workers and their managers are highly aware of the combined dangers for children of domestic abuse, parental mental ill health and substance misuse. Effective services work collectively with families, and individually with parents and children, reducing the risk of harm to children who live in families in which these conditions prevail. The local authority has a comprehensive understanding of the profile of domestic violence, substance misuse and parental ill health. Child in need and child protection plans carefully evaluate the impact of service provision for children and families affected by this trio of difficulties. Multi-agency risk assessment conferences and multi-agency public protection arrangements are both effective.
28. An edge of care service, the 'specialist family focus' team, has improved the outcomes for 130 families with children aged over 11 years. Families benefit from intensive, creative, multi-disciplinary, evidence- and research-based practice grounded in a systemic practice model. The 'keeping families together' team provides a dynamic, strength- and relationship-based 'team around the child' approach, offering intensive family support and achieving positive outcomes for most families.
29. Services for children who go missing from home are acknowledged by the local authority as an area requiring improved practice. Arrangements for tracking missing children are rigorous, through regular monitoring and liaison, with appropriate actions pursued by involved agencies. However, return home interviews are not being consistently completed, and their content does not helpfully inform subsequent work to reduce the risk of further missing episodes.
30. The local authority holds clear and accurate information on children who are missing education and those who are electively home educated. Most children missing education are successfully tracked and identified. Staff undertake checks with all relevant agencies to establish their whereabouts, including housing, local authority council tax records, UK Visas and Immigration and children's social care. Staff regularly see children, ensuring that they have a good overview of their welfare.

31. Clear and well-established joint pathways between housing and social care are in place, ensuring that young people are well supported when they present as homeless. Joint assessments address presenting and underlying issues. Once a young person's immediate needs are considered, interventions, including family therapy or mediation, follow. Unaccompanied asylum seekers also benefit from a well-defined service pathway when they present for support in Southwark.
32. Private fostering arrangements are highly effective. Successful awareness raising has resulted in a significant increase in notifications. Private fostering assessments are timely and completed to a high standard. The use of a specific template ensures that relevant information is gathered. This includes a detailed account of the child's history and direct work ensuring that children's views are taken into account. Parallel with this work, an assessment of the carer is undertaken, including relevant checks and consents. Relevant and purposeful actions are pursued to support children in their placements.
33. The designated officer function has recently been enhanced and is effective. Well-attended strategy meetings provide clear, specific actions. Partnership arrangements are effective, and there are clear reporting arrangements. However, the designated officer does not measure the timeliness of investigations, which is a shortcoming.

The experiences and progress of children looked after and achieving permanence	Requires improvement
<p>Summary</p> <p>The quality of work is too variable for children looked after, and the majority of practice requires improvement. While outcomes for most children looked after are good, they are less positive for a significant minority of children. A small number of children have to wait too long to become looked after. Many experience delays in the starting or updating of their life story work, and some children who are in long-term foster placements have to wait too long to achieve permanence.</p> <p>Overall, there is poor oversight of cases for children looked after by managers and independent reviewing officers (IROs). Delays in delivering children’s care plans and, in a small number of cases, assurance regarding the safeguarding of children, are not being addressed effectively.</p> <p>Too many children have experienced numerous moves and placement breakdowns. There is a lack of sufficient placements for adolescents who have challenging behaviours, and the local authority has been too slow to address this.</p> <p>The local authority has successfully improved timeliness for cases in the PLO, and those issued before the courts. Most children and families subject to the PLO are now effectively supported to reduce risks, allowing children to remain with their families.</p> <p>The virtual school effectively supports and challenges the quality of provision of children’s education for those who are looked after. Children’s attainment is above that of comparators, but the attainment gap between children looked after and their peers remains wide.</p> <p>Younger children benefit from early consideration of permanence, which enables them to live in permanent homes within reasonable timescales. Experienced, well-trained social workers effectively support and prepare children for adoption. Prospective adopters are rigorously assessed and receive high-quality training and post-adoption support. As a result, children thrive in their adoptive homes.</p> <p>The support that care leavers receive is too inconsistent, and managers are not effectively addressing this. While many young people receive the support that they need to make progress in some aspects of their lives, the support and progress that they make is not consistent across all areas. Staff do not know the current needs and circumstances of a significant minority of young people and, as a result, are not in a position to offer the support that these young people need.</p>	

Inspection findings

34. Children become looked after when this is the most appropriate way to meet their needs. A relatively high number of children have become looked after urgently after critical incidents, despite several of them being in the PLO process or otherwise known to the local authority. In these cases, the known risks had escalated to a degree that the children were experiencing situations in which there was high and immediate risk of harm. In a small number of these cases, earlier action may have prevented further adverse impacts for children.
35. For children who return to their families as part of a planned move, risks are assessed and, for most children, effective transition plans are in place. These provide a clear framework to support children and their families both prior to and following return home. For some young people who choose to return home immediately, there are delays in putting effective support plans in place.
36. Following a review of the use of the PLO, a strengthened approach to achieving permanence for children is now in place. A variety of measures, including an effective permanency taskforce meeting, are being used to maintain a strong overview of children subject to the PLO and children with a plan for adoption. As a result, the duration of care proceedings is continuing to reduce for children.
37. Legal planning meetings, support, interventions and relevant assessments are all used effectively to reach clear decisions for families during the PLO. In the majority of cases, actions are followed through in a timely way, and risks are reduced, thereby avoiding the need to progress to care proceedings.
38. The majority of assessments and court statements contain appropriate explorations of histories and risks, and analyse issues well to reach relevant conclusions. They include the views of parents, including fathers, and most provide a good overview of children's needs. However, children's personalities and lived experiences are not always clearly described, particularly those of younger children.
39. Too many children looked after have experienced multiple changes of social workers. Despite almost all children looked after receiving regular visits from social workers, these are not always purposeful, and many children have not been able to establish a strong rapport with their social worker. When children are able to build relationships with their social worker, the quality of direct work is often very child centred, and there is evidence of children's wishes influencing their plans.
40. Advocacy is not being used well for children looked after. Only 11 children were supported by an advocate at their review meetings in 2015–16. The local authority does not know how many children are currently being supported by

the independent visitors' scheme, or how many children are waiting. Despite concerted efforts by the complaints team to advertise the process, children told inspectors that they do not know how to make a complaint.

41. There is a variable response to issues of bullying affecting children. For example, one child who was experiencing bullying was provided with support immediately. For another child, concerns of bullying were not adequately addressed by the professional network or included within the child's care plan.
42. In most cases seen, the risk of child sexual exploitation to children looked after has reduced as a result of intervention and support. This has included appropriate use of secure accommodation, 'keep safe' work and support from sexual health specialists. For children who go missing from care, the quality and timeliness of return home interviews and the quality of planning through regular strategy meetings are not consistently strong or reducing risks. Children who are misusing drugs or alcohol, or who are offending within the community, are offered an appropriate multi-agency response to help them to understand and to reduce the risks associated with their behaviours.
43. Children's physical, emotional and mental health needs are considered, and appropriate services are put in place to meet identified need. These include effective support and intervention from 'CareLink', the well-regarded local child and adolescent mental health service (CAMHS) for children looked after. However, children's physical health needs are not always assessed quickly enough, and the quality of health assessments is not consistently strong.
44. The virtual school maintains a sound oversight of children's progress and attainment, particularly of those who are at risk of under-achievement and those who have poor school attendance. Managers of the virtual school understand well the strengths and areas for improvement of the service and are taking effective action to tackle these. Overall, most children looked after attend a good school regularly, receive good support and make positive progress.
45. Children benefit from additional support provided by new posts in the virtual school, funded by the pupil premium grant. This is leading to improvements for children looked after, for example, in the attainment of those at key stage 4. Education advisers in the virtual school provide good challenge to schools when they do not evidence sufficiently the progress that children are making. They act as effective advocates for children, leading to more timely assessments of their educational needs. They also liaise effectively with professionals, including those outside of the local authority area, so that children are placed in settings that best meets their needs.
46. Children looked after achieve well at key stage 2 and key stage 4 and do better than those in similar areas. However, the attainment gap between children looked after and their peers remains wide. As a result of good

support when young people complete Year 11, the vast majority move into and stay in education, training and employment.

47. Increasingly, children have an up-to-date personal education plan (PEP). However, the quality of PEPs varies too much, and the virtual school is working hard with social workers and schools to continuously improve the quality of PEPs.
48. Diversity is considered well for the majority of children looked after. This includes careful consideration during matching for placements, including ways in which children's needs will be met when a full cultural placement match is not possible.
49. Children looked after are encouraged to engage in positive leisure activities. Social workers and carers are supported to prioritise social, educational and recreational activities for children. However, not all foster carers are aware of their delegated authority to sanction activities for children in their care.
50. The local authority has limited success at placing brothers and sisters together, and many siblings live separately due to lack of placement choice. 'Together or apart' assessments are not consistently timely or of sufficient quality to fully inform children's plans. The large majority of children looked after benefit from carefully considered contact with their families. This ranges from letter box and supervised contact, through to child-directed, flexible contact for older children and young people.
51. Too many children experience numerous changes of placement that are not in accordance with their care plans. While the majority of children are matched appropriately according to their needs, there are also some children who are placed with carers or in residential units that do not meet their needs or adequately safeguard them. Placement stability for children, both long term and short term, is declining.
52. The majority of children's plans and reviews do not sufficiently consider children's personalities, and many fail to identify children's capacity to make and sustain friendships. Some plans do not adequately address issues such as health needs or the impact of a disability for the child. The majority do consider children's basic needs and leisure time preferences. However, there is not sufficiently strong oversight or challenge by managers and IROs when plans for children are not progressed quickly enough. Decision-making and the rationale for decisions are not always clear in children's case records. This means that children seeking to understand their care histories later in life would not be able to fully comprehend their care journeys. Current performance regarding the timeliness of reviews is not strong and is not being addressed with sufficient urgency.

53. The learning and health needs of children who are looked after outside the local authority area are not always sufficiently considered when their placements change. This means that, for many of the large number of children living in other local authority areas, education and health services are secured only after they have moved into their new placements. Children living at a distance are also more likely than others to experience delays in having their care plans reviewed or their health needs assessed.
54. There is not a sufficient range of high-quality placement options available for adolescents, particularly those who present challenging behaviours to their carers. This lack of sufficiency leads to a significant number of placements that repeatedly break down for these young people. The progress towards meeting this gap, which was identified in 2014, has been too slow. There is a suitable range of placement options for children under 10 years of age.
55. Actions taken to recruit foster carers have had very limited impact. In 2016–17, there were 195 enquiries, but these led to only eight new carers being approved. This is despite actively seeking to recruit through regular drop-in and information sessions, and existing foster carers being offered an introduction bonus for any future carers. There are currently eight foster carers undergoing assessments and four waiting for assessments to commence.
56. The quality of decision-making when placing children is further hampered by the variable quality of referrals for placements. There are too many referrals that do not provide sufficient overview of children’s personalities or of their range of needs and issues, to support effective matching decisions.
57. There is a wide range of training offered to foster carers that is highly valued by them. This includes recent training on a more therapeutic approach to caring for children. Oversight of foster carers’ ongoing suitability requires improvement. Record-keeping is poor, and there is a lack of rigour in addressing Disclosure and Barring Service checks and ensuring that foster carers’ training is current.
58. Early plans are being made, especially for younger children, to achieve permanence through an appropriate range of permanency options, including SGOs, connected persons’ placements and adoption. Potential connected persons’ carers and special guardians are assessed thoroughly for their suitability. Special guardians, and the children living with them, are effectively supported when needs arise through direct work with social workers and therapeutic input by CareLink.
59. Social workers, Children and Family Court Advisory and Support Service (Cafcass) guardians and IROs liaise effectively regarding children’s plans for permanence through legal orders. However, most children wait too long to achieve permanence when they are in long-term foster placements. This

means that children may be prevented from building strong, enduring relationships with their carers until firm agreements are reached. This is further hampered when life story work is delayed or in need of updating. Some life story work is excellent and has helped children to explore difficult issues with their carers.

60. 'Speakerbox', the Children in Care Council, has an open membership policy to engage a wide range of children looked after. 'Speakerbox' has achieved a great deal over the past year, including developing training materials to help professionals to understand how important it is that they carefully consider contact between brothers and sisters for children who are looked after.

The graded judgement for adoption performance is that it is outstanding

61. Early consideration of permanence for children is an embedded approach throughout the social work teams in Southwark, and adoption is considered for all children. Children and adopters receive high-quality support from a stable, experienced and well-trained workforce, resulting in children benefiting from a permanent home.
62. Adoption is identified promptly as a potential permanency arrangement. Permanency consultations occur quickly between the adoption team and safeguarding and assessment teams, resulting in a thorough and early understanding of children's needs by the receiving permanency team. When adoption is the agreed plan for the child, the allocated social worker remains with the child through to the stage when an adoption order is made. This attention to continuity means that children develop good, trusting relationships with their social workers.
63. Child permanence reports are of high quality, clearly demonstrating the needs and characters of children. The reports are regularly updated, providing prospective adopters with a contemporary picture of children, in addition to their background histories. Social workers know their children well, and sensitively and accurately describe children's profiles.
64. Life story work is of high quality. Comprehensive and sensitive descriptions of the reasons for children entering care, histories of their birth families and their cultural identities through pictures and photographs provide helpful illustrations. The books also include details of foster families and children's new families. Some adoptive parents spoke of how they regularly refer to the books with their children to help them to understand their pasts. Later life letters are clear, accurate and sensitively written.
65. Careful management oversight of children's progress towards adoptive or other permanent placements is achieved through a range of effective processes. These include a tracker, efficient caseload management and

regular, reflective supervision, resulting in consistently high standards of casework. All options to find the right families for children are pursued, including the South London consortium, Link Maker, the adoption register and national advertising. Close working relationships in the adoption team mean that, when potential adopters are either being assessed or have recently successfully completed their assessments, potential matches for children are speedily identified. Family-finding processes effectively match children, and anonymised child profiles circulated during care proceedings ensure early exploration of opportunities to find permanent families for children.

66. Arrangements to monitor the progress of children who are subject to an adoption plan are strong, with rigorous senior management tracking of timeliness through permanency taskforce meetings. The average timescales between children entering care and moving into adoptive placements, and between placement orders and matching, are improving. When there were delays, inspectors saw justifiable reasons in each case, ensuring the right outcomes for children. Fourteen of the 20 matches reviewed by the panel in the year preceding the inspection had been within 91 days. At the time of the inspection, there were eight children waiting for adoption. Two of these were brothers linked to adopters, with a panel date imminent. Active and persistent family finding was in progress for the other children, including detailed 'together or apart' assessments.
67. Foster to adopt is well established in Southwark, reflected through 10 placements. A clear understanding of early permanence is demonstrated through two recent adoptions of relinquished babies, following swift referrals from the pre-birth team to the adoption team. A skilled and experienced social worker uses regular recruitment drop-ins as an opportunity to explain this option to all prospective adopters.
68. Adopter preparation is excellent. Adopters described a necessarily challenging process, resulting in their feeling well prepared for becoming adoptive parents. Preparation for adoption training was highly regarded by a group of adopters spoken to by an inspector. Southwark is part of the South London consortium, which enables adopters to readily access training courses. One adopter spoke of how well supported she felt through her social worker attending a course with her.
69. Prospective adopter reports are analytical, demonstrating a thorough exploration of relevant issues. Hypotheses are tested through group supervision, and effective management oversight results in high-quality and timely assessments. Checks and references are completed and clearly documented. Adopters from a wide range of backgrounds are approved, reflecting the diverse ethnic communities in Southwark. This includes single carers and same sex couples.

70. When a child requires an assessment and possible therapeutic support prior to adoption, clinical psychologists, the medical officer and the social worker meet with prospective adopters to ensure that they have a clear understanding of the current and potential future needs of the child. Adopters told inspectors that this means that they are fully aware of the complex needs of their children. Adoption support plans are clear and detailed in identifying how future needs will be met. All adopters spoken to were clear about how to access support in the future.
71. Robust quality assurance processes ensure that panel reports are of a consistently high standard. The recently merged adoption and fostering panel benefits from an experienced, knowledgeable chair, and panel membership is suitably diverse. Minutes demonstrate quorate meetings, ensuring effective oversight of adoption decisions. The agency decision-maker is suitably qualified and experienced, and decisions are made promptly. Adopters described positive experiences of panel to the inspector. However, the chair and agency decision-maker have yet to meet since the merging of the panels, and this is a missed opportunity.
72. The post-adoption support service features motivated and skilled practitioners. Adopters seen during the inspection praised the support that they received from the local authority, providing examples of the authority's tenacious support to ensure that children received the help that they needed. A comprehensive range of post-adoption support groups is available, including a weekly play session, a group for adopters who are waiting and an adult support group. Social workers apply their learning and experience effectively in their direct work with families. Inspectors saw examples of families supported to manage complex behaviours. When specialist support was required, this was readily available either through the local CAMHS service, or through a wide spectrum of commissioned provision.
73. There have been no adoption disruptions in the two years preceding the inspection, indicating that post-adoption support in place for children and families is effective.
74. Good use is made of the adoption support fund in order to provide specific therapeutic interventions for children and to provide training and support to parents. Adopters highly rate the service that they receive from Southwark, informing the inspectors that 'they get things done'.

The graded judgement about the experience and progress of care leavers is that it requires improvement

75. Managers, social workers and personal advisers are highly committed to supporting young people leaving care, so that they achieve well and make a successful transition to adult life. New management arrangements and the recently established dedicated leaving care team are improving the quality of support that young people receive and building on areas of good performance.
76. Managers are developing a positive culture that is improving the services available to care leavers. However, the support that care leavers receive is inconsistent, and, for too many, it does not enable them to make sufficient progress across the different aspects of their lives.
77. The quality of pathway planning to meet young people's needs is too variable. As a result of recent action by managers, the majority of young people now have an up-to-date pathway plan. However, the needs of a significant minority of young people are not sufficiently understood by staff and, as a result, planning does not fully reflect the specific needs of individuals. Plans are not always clear as to the specific measures that staff will pursue to reduce any evident risks to young people, such as repeat missing episodes or time out of education.
78. Personal advisers and social workers are increasingly having regular contact with young people on their caseload, and most young people are seen regularly. However, for a significant minority this is not the case. In some instances, managers are slow to intervene when staff are not progressing work in a timely way. This results in delays to young people receiving the support and help that they need to move forward in their lives.
79. Young people who spoke to inspectors hold mixed views about the quality of the relationship that they have with, and the support that they received from, their personal advisers or social workers. Some feel that staff leave them to fend for themselves and that they have too little communication with their worker, in particular when they turn 18 years of age or are at university. However, others hold their social worker or personal adviser in very high regard and gave examples of when they have benefited from very effective help, for example in being supported to find suitable accommodation and training.
80. There is a good range of financial support available to young people to support their transition to adulthood, such as travel costs to attend college, accommodation costs during university holiday periods and allowances to set up their first home. However, young people are not sufficiently aware of their entitlements, including the financial support available to them, if they attend

university, or the practical help that they should receive when they become 18 years old. In a minority of cases, young people do not receive sufficient help to ensure that basic, essential necessities, such as their passport, national insurance number and bank account, are in place.

81. Most young people receive good support to achieve their education, employment and training (EET) goals, benefiting from the specialist advice and guidance available. Published data shows that the proportion of young people in EET is around the same as that in other areas. However, more recent local data shows that approximately three quarters of young people aged over 19 years old are in some form of EET, which is a comparatively high proportion. Most young people who spoke to inspectors feel that they receive good support to progress in their education and career goals, although this is not universal. In a minority of cases, there are delays in putting the additional help in place that young people need to achieve their next step in EET.
82. A good proportion of young people are at university. However, young people were not wholly positive about the support that they receive while at university. For example, some reported a lack of help in navigating the housing options available, and others feel that they are left on their own when they begin their courses.
83. Young people who spoke to inspectors feel safe where they live. Social workers and personal advisers provide effective support to young people that helps them to find accommodation that best meets their needs. As a result, a good proportion of young people live in suitable accommodation. Staff effectively promote the option of young people remaining with their foster carers when they turn 18 years old. Consequently, approximately a fifth of current care leavers are doing so. Bed and breakfast accommodation is never used, and use of houses of multiple occupation is extremely rare.
84. At the last inspection, care leavers felt that they did not receive enough support in preparing for independent living. Young people who met with inspectors at this inspection had very mixed views on the support that they receive to live independently, and they feel that they need more help, particularly in managing money, despite pre-tenancy training and training in budgeting being available.
85. Young people have their basic health needs met, and most are registered with a local doctor and dentist and are aware of the range of help available so that they can live healthily. Young people receive regular reminders from workers about their health appointments, and, increasingly, those aged 17 are attending their health checks and receiving a summary of their health histories so that they are well placed to manage their own health appointments.

86. Young people are not sufficiently aware of how to complain, should they be dissatisfied with aspects of the support that they receive. Some feel that they are not listened to when they express dissatisfaction over aspects of the service that they receive and they find managers hard to reach.

Leadership, management and governance	Good
<p>Summary</p> <p>The local authority has a comprehensive understanding of the complex needs of the community and has developed adaptable and creative services to respond to local need. The senior leadership team has been strengthened, and four new assistant director posts were appointed to in 2016. Significant improvement work in recent months has enabled service performance reviews to be completed and compliance and quality issues to be addressed. Service plans are in place to address all of those areas of practice that are not yet consistently strong. Progress in performance can be seen in the adoption service, the front door and the MASH. However, services for children looked after and care leavers are still too variable. Services to survivors of female genital mutilation and children at risk of sexual exploitation demonstrate improvement and strong practice.</p> <p>A culture of high support and high challenge is promoted, and areas of good practice are celebrated and learning widely disseminated. Innovative practice is actively sought and developed, for example, with the award winning 'Pause' project. This outward-looking professional culture enables good social work to flourish in many areas.</p> <p>The newly formed quality assurance unit provides good performance data and undertakes valuable monitoring and practice reviews. Following a transfer to a new electronic case management system, data has not yet been fully cleansed. Consequently, child in need and children's review information is not yet available in a comprehensive format. This remains a significant gap.</p> <p>There is a strong, shared corporate ownership and ambition to improve outcomes for children, extending across the local authority partnerships. Strong, passionate and committed political support and challenge are enabling the local authority to make continuous improvements. Mature strategic partnerships are a strength and translate into good operational practices.</p> <p>Children and young people are at the heart of all services. They are involved in all areas of decision-making, service planning, scrutiny and challenge and are fully integrated in the development of children's services.</p> <p>Workforce development continues to be a priority. Promoting the 'social work matters' model of practice and creating widely available learning and development opportunities are having a positive impact on sickness rates and staff turnover. Although some children reported that they have had a high number of social workers, this is partly attributed to internal changes, which have been made to improve the quality of services.</p>	

Inspection findings

87. Since the last inspection, the senior leadership team has changed. The strategic director of children's and adult services, the statutory DCS, was appointed in October 2014, and a director of children and families' services was appointed in June 2016. Following these appointments, there was a finding of too much inconsistent practice across services. This stems from the mixed impact of the implementation of the 'social work matters' practice model, introduced in 2014. This model is based on systemic practice, small teams, widespread use of clinical and group supervision and evidence-based approaches.
88. The senior management structure has been strengthened over the last year to accelerate change and improvement. Four new assistant director level posts have been created and appointments made. The progressive impact of this additional senior management investment is becoming evident. There is rigorous and regular oversight of the performance of frontline managers, and weaker performance is being determinedly addressed through high support and high challenge. The full impact for children of this rigorous management approach is yet to be demonstrated across all service areas.
89. Strong political leadership in the local authority demonstrates commitment and ambition for vulnerable children. This thread is evident throughout all of the local authority's priorities and plans. Members have protected the children's social care budget for a further three years, allowing substantial continuing investment in workforce transformation.
90. The lead member for children is an active participating observer on the LSCB and the corporate parenting committee, demonstrating a thorough understanding and knowledge of the priorities of children's services. The chair of the scrutiny committee for children is also highly effective and has been instrumental in developing innovative service models. This supports a strong multi-agency approach to issues affecting vulnerable children in the local authority.
91. A comprehensive joint strategic needs assessment (JSNA), which included a consultation with more than 1,000 children, parents, carers, staff and practitioners, informed the local authority's formation of its strategic priorities for children.
92. Children are very active in all of the local authority meetings that affect them. 'Speakerbox' and 'Changemakers' are participation forums that children and young people regularly attend, to give advice and challenge. Young people consistently told inspectors that they feel valued and respected when they attend. Children are also involved in the recruitment and training of staff, new policy developments and ways of working. One of many examples of their impact is the way that care leavers' exit interviews are conducted. This has

improved through better engagement with young people. This ingrained participation is a real strength in the local authority.

93. Social work in Southwark is largely child focused, and the views of children are actively sought and demonstrated. Currently, 96% of children looked after participate in their reviews. Further work is under way to support children in attending their child protection conferences and core groups. However, in the care teams, the voice of children is not sufficiently clear in assessments and plans.
94. Mature strategic and operational partnerships are prominent. Partnership working is strong through all services provided for children. Working arrangements between highly committed elected members, the LSCB chair, the strategic director of children's and adult services and the chief executive are compliant with statutory guidance. These arrangements are underpinned by appropriate formal governance protocols, so that senior officers are regularly held to account. Recent effective partnership service delivery has been evidenced in services, effectively addressing female genital mutilation and child sexual exploitation. Both of these areas have been strengthened and improvements made to frontline practice and services through an embedded multi-agency approach.
95. The local authority has recently been successful in three Department for Education (DfE) innovation bids. Bids feature improved services to care leavers, expansion of the family group conference offer and a further extension to the 'Pause' project, working with women who are vulnerable to having children repeatedly taken into care. This demonstrates commitment and high ambition for continuous improvement and development of services. The senior leadership team is passionate that service delivery continues to meet the emerging needs of vulnerable children and families in Southwark. Senior leaders ensure that they maintain a direct line of sight to frontline services, and they meet regularly with children and young people from 'Speakerbox' and other users of the services that they provide.
96. The recently formed quality and performance improvement service has introduced a framework that brings together three main elements of performance management: quality assurance, practice review and regular performance monitoring. Examples of the framework include recent 'deep dive' scrutiny of the front door and early help services. This has resulted in positive changes in the MASH and instigated an early help service review.
97. Performance data is provided to managers at all levels and to support scrutiny in council meetings. This is largely provided in a useful and clear format. Recently, the corporate parenting committee requested case studies to help its understanding of the meaning of the data produced, which were subsequently provided. Data cleansing is ongoing in important areas, such as

child in need performance data. However, the voices and experiences of children are not sufficiently prominent in performance reports.

98. The provision of high-quality placements for children looked after, particularly for adolescents, is insufficient. The sufficiency strategy for post-16 accommodation for young people leaving care has recently been refreshed. The needs analysis and scoping involved a wide range of relevant parties, including the integral participation of young people. The strategy aims to rationalise current service provision to ensure that it is fit for purpose for the future. The commissioning and provision of early help services are also under review.
99. There is a comprehensive workforce development plan, which covers a wide range of learning opportunities. An academy is currently under development, which will further strengthen the considerable training and development opportunities already available for staff and students. The extensive learning and development programme of the LSCB complements the local authority programme. This provides access to a broad range of learning opportunities, including short and long courses, accredited and non-accredited programmes, bite-size sessions and regular conferences.
100. Expected standards of social workers' and managers' performance are high. Careful support is provided to staff who underperform, and assertive action is taken to manage staff who are unable to improve. However, there is currently no skills audit or detailed record of social workers' or managers' current levels of training and development.
101. Most staff who spoke to inspectors feel well supported. Low sickness levels and a comparatively low turnover of social workers support this finding. Retention rates of social workers are relatively good, compared with similar London boroughs. Expectations of social workers' standards are high, and managers are actively supporting and challenging under-performance, resulting in some staff turnover. There are too many changes of social workers for children who are looked after, but this is primarily due to recent internal challenges and changes, intended to stabilise the allocation of social workers over the long term. Weekly practice supervision sessions in the safeguarding and assessment sets include clinical and advanced practitioners, enabling staff to examine and hypothesise about the impact of their work with children and families. However, this practice model has not yet been consistently applied within the care and care leavers' sets. In addition to the weekly sessions, monthly one-to-one supervision takes place for most staff. There are some instances, particularly in the children looked after and care leavers' service, where drift and delay in some service provision for children are evident as a result of weaker management oversight.
102. Due to the inconsistent implementation of the 'social work matters' model, the role of the clinical practitioner has recently been reviewed. The outcome was

the creation of a clinical lead post, which aims to improve standards and support clinical practitioners' learning and development. This initiative, coupled with the rigorous support and challenge of poor performance of some frontline managers, further demonstrates the ambition of senior leaders to provide good-quality services to all vulnerable children.

103. Senior leaders know themselves well. Strategic documents and action plans succinctly draw together areas for improvement. These prioritise similar areas highlighted in this inspection. Substantial improvements have been achieved in the adoption and permanence service and the MASH. Service developments and improvements have been secured through working effectively with partners, creating a culture of continuous improvement and, above all, having an ambition for improved outcomes for children at the heart of services. A high number of children looked after attend good or outstanding schools in the borough, and additional, focused home tuition is provided to boost core subjects. The local authority's virtual headteacher is proactive in ensuring effective provision.

The Local Safeguarding Children Board (LSCB)

The Local Safeguarding Children Board is good

Executive summary

The independent chair of the LSCB provides strong leadership. Since his arrival in 2013, he has brought energy, commitment and determination. This has resulted in a strong focus on safeguarding children, a streamlined structure, clear priorities and a culture of challenge across the partnership. The impact of the LSCB's work is evident across a range of areas. There are well-established links between the LSCB, the Health and Wellbeing Board and other relevant strategic forums. These arrangements allow the Board to ensure that children's safeguarding issues remain high on everyone's agenda. Children's and adults' safeguarding arrangements have been aligned to ensure greater synergy and a focus on the family. This reduces duplication, improves efficiency and promotes a shared understanding of issues such as gangs and female genital mutilation.

The LSCB has completed an ambitious programme of audits. These, together with ongoing scrutiny of issues and information from performance data, ensure continuous and effective monitoring of frontline practice. A new performance management framework is helping to ensure greater understanding of practice. However, further work is required to embed the use of data in the Board's sub-groups.

The Board has been instrumental in developing work around key issues, such as radicalisation, female genital mutilation, gangs and child sexual exploitation. There has been an extensive training programme and media campaigns on child sexual exploitation, resulting in increased identification and more prosecutions.

The group of young people who work with the board, the 'Changemakers', is a valued and integral partner in delivering the safeguarding agenda. The group undertakes meaningful and innovative work that has impacted on partners' understanding of issues and resulted in changes to services.

There is a comprehensive LSCB learning strategy, aligned to the Board's priorities. Training is informed by learning and annual evaluation of impact. This work now needs to be built on, with closer analyses of the needs and gaps in the workforce across the partnership.

The annual business plan is not sufficiently clear and lacks measurable outcomes. Risks and concerns are not always explicit. As a result, the system for monitoring important issues and actions requires strengthening.

Recommendations

104. Embed the performance framework into the work of the sub-groups, ensuring that relevant performance data informs analysis and evaluation of services.
105. Undertake analysis of workforce training needs and gaps in order to ensure that training is relevant and targeted effectively.
106. Ensure that the annual business plan is specific, measureable and time-limited and strengthen the systems for tracking actions, risks and concerns.
107. Continue to develop a clearer understanding and more appropriate application of thresholds for referrals to children's social care across partner agencies.

Inspection findings – the Local Safeguarding Children Board

108. The LSCB in Southwark has strong and effective governance arrangements to ensure that all partners are fulfilling their statutory duties to safeguard children. The chair of the LSCB provides strong and clear leadership. He is well respected and influential, and has relentlessly driven forward work to ensure improvements. This has resulted in a strong focus on safeguarding children, a streamlined structure, clear priorities and a culture of openness and healthy challenge across the partnership. The Board embraces continuous improvement, recognises areas for development and responds to ongoing emerging safeguarding issues across the local authority.
109. There is strong communication between the LSCB, the Health and Wellbeing Board, multi-agency forums and senior officers across the partnership. These arrangements allow the Board to ensure that children's safeguarding issues remain high on everyone's agenda. In 2015, the LSCB chair also became the chair of the adult safeguarding board. Since that time, work has taken place to bring the two boards and other strategic forums together. The community safety partnership, Safer Southwark, is now part of the adult safeguarding board. Revised sub-group arrangements mean that the two boards share relevant sub-groups, such as human resources, community engagement and practice, development and training. There is a shared partnership forum, and twice each year the boards come together to discuss priority areas of work.
110. While work is still taking place to finalise these arrangements, this alignment of the two safeguarding boards has resulted in greater synergy and a holistic focus on families. It reduces duplication, improves efficiency and promotes shared understanding and better joint working to address issues such as gangs and female genital mutilation. However, the governance protocol from 2014 has not yet been updated to reflect these changes.

111. The LSCB and the local authority hold each other to account. The LSCB chair works closely with the statutory DCS, the chief executive, cabinet members and the leader of the council. As a result, the Board is active and influential in planning and informing services.
112. There is a strong and engaged partnership. The LSCB includes a wide range of appropriate partners. Attendance at all meetings is high, and partners report that they attend regularly because the meetings are valuable. Board meetings frequently include more than 35 people. They are well managed and focused and include time for breakout discussions on key subjects. One partner described Southwark's approach as 'collegiate', and this is reflected in the number of different agencies chairing the 11 sub-groups and being involved in reviews and shared task and finish groups. An example of this is the current work to review the Board's oversight of children who have a disability.
113. The partners' commitment to the Board is apparent, not only in the time that they give to the LSCB, but also in the financial contributions made. The Board increased its budget in 2016–17, and partners have agreed additional core funding for 2017–18 in order to expand the support team for the children's and adults' safeguarding boards to include an additional analyst and two partnership officers.
114. The Board receives and reviews a range of relevant reports and updates that are scrutinised and challenged. An example of this is a report on private fostering arrangements. The Board's scrutiny led to awareness raising in the community and a greater understanding of how private fostering is identified. This has resulted in an increase in private fostering notifications.
115. While challenge and scrutiny are part of all of the Board's work, the system for tracking areas of concern and risks, through a forward plan and minutes of meetings, is not thorough enough. It does not sufficiently identify risks or those areas that the Board is concerned about.
116. There is a clear learning and improvement framework, and the partnership embarked on an ambitious programme of multi-agency audits in 2015. Audits have included child protection processes, parental mental health, home education, children missing education, child sexual exploitation, child protection plans for children who have a disability, adolescents, neglect and the MASH. These, together with regular reporting of single-agency audits, ensure continuous and effective monitoring of frontline practice.
117. The Board has introduced a performance management framework. This helps to ensure a greater understanding of practice and informs challenge. An example of this is the Board's concern about an increase in children's social care referrals. This challenge led to a MASH audit and a revision of the threshold document, and helped the local authority to identify changes to the

management arrangements for early help services. While the Board routinely considers performance data, it acknowledges that more work is needed to embed data into the work of sub-groups. Education and training data requires strengthening, and the multi-agency sexual exploitation (MASE) panel and human resource dashboards require further work to align partners' data.

118. Partner agencies prioritise safeguarding. The annual section 11 audits of safeguarding arrangements, undertaken by most agencies, demonstrate this. There is good analysis and scrutiny through a multi-agency challenge panel. All partners have individual action plans, and the Board collates key themes to inform its work. The Board recognises that this process needs to be extended to schools and more voluntary and community sector groups across the local authority. A task and finish group has been set up to explore how changes can help these agencies to become more involved in the process.
119. The child death overview panel (CDOP) and its sub-group, the neonatal death overview panel (NDOP), are shared with another local authority area. They are effective and benefit from a broader understanding of a larger population. They demonstrate learning and impact and are integral to the Board's work.
120. The SCR group provides a rigorous system for consideration of serious incidents and dissemination of learning from all case reviewing activity. During the inspection, the SCR for Child U was published. It highlights improvements required in information sharing and work with gangs and knife crime. Learning events, as part of the SCR process, have taken place, and an action plan is about to be implemented.
121. The Board has been instrumental in developing work on key issues, such as preventing violent extremism and female genital mutilation. It has undertaken considerable work on child sexual exploitation and established a tactical MASE group at director level, which reports to the Board. All agencies have given a pledge to tackle child sexual exploitation. There has been a large-scale training programme. The risk of child sexual exploitation is part of the school curriculum and an extensive media campaign included e-newsletters to thousands of residents. As a result, there are improved understanding and identification of child sexual exploitation, and this is evidenced by an increase in prosecutions and coordinated disruption activity across the borough.
122. The young people's group working with the board, the Southwark 'Changemakers', is a valued partner in delivering the safeguarding agenda. The group has representation at the chairs' sub-group, and young people regularly present their findings to the Board on the broad range of topic-based work that they are doing. Since the beginning of 2016, the group has undertaken meaningful and innovative work, which has impacted on partners' understanding of issues. A good example of this is the current work to develop a range of text messages to help girls to support peers who might be involved in child sexual exploitation. The group of 12 'changemakers' has

close links to other young people's engagement groups and, as a result, is able to reach a large population of children. This is illustrated by the group's survey of 800 children to capture the issues most important to children across the borough.

123. There is a clear and comprehensive LSCB learning strategy, aligned to the Board's priorities. It includes all levels, from practitioners to senior managers, the Board and elected members. Partners are involved in the commissioning of training to ensure that external training reflects Southwark issues and ways of working. A four-stage evaluation process evaluates the impact of training on practice and an annual evaluation, with other learning, informs the annual training calendar. However, a more detailed needs and gap analysis of the workforce is now required to ensure that people are receiving the training that they need and to inform the number of courses required.
124. The LSCB annual report 2016–17 provides a rigorous and transparent overview of its work. Findings from the report inform the annual business plan, which details work in each of the six priority areas, and this underpins work plans for each of the subgroups. However, while all of the actions within the Board's control have been completed, the business plan does not include timescales or identify who is taking forward actions. This makes it difficult to ensure that work is on track.

Information about this inspection

Inspectors have looked closely at the experiences of children and young people who have needed or still need help and/or protection. This also includes children and young people who are looked after and young people who are leaving care and starting their lives as young adults.

Inspectors considered the quality of work and the difference that adults make to the lives of children, young people and families. They read case files, watched how professional staff work with families and each other and discussed the effectiveness of help and care given to children and young people. Wherever possible, they talked to children, young people and their families. In addition, the inspectors have tried to understand what the local authority knows about how well it is performing, how well it is doing and what difference it is making for the people whom it is trying to help, protect and look after.

The inspection of the local authority was carried out under section 136 of the Education and Inspections Act 2006.

The review of the Local Safeguarding Children Board was carried out under section 15A of the Children Act 2004.

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The inspection team consisted of seven of Her Majesty's Inspectors (HMI) from Ofsted.

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