

GREATER LONDON AUTHORITY

Good Growth

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Department: Good Growth

Date: 28 June 2021

Dear Jin,

Thank you for submitting your Annual Status Report (ASR) for 2020 in fulfilment of Part IV of the Environment Act 1995.

As part of the London Local Air Quality Management (LLAQM) system introduced in April 2016 and updated in 2019, the power to approve these reports sits with the Mayor of London, pursuant to Part IX of the Greater London Authority Act 1999.

Please see below for the outcome of your report assessment and some other important updates.

Assessment of your report

On the basis of the evidence provided by the local authority, the conclusions reached are **accepted with amends required before publication – please see points 8 & 9 in the appendix for the issues that need to be amended before publication.**

Please see the notes attached at the end of this letter for detailed comments on your report.

GLA update

I wanted to take this opportunity to thank you for your ongoing efforts to tackle air pollution in your borough, especially in the current challenging times. Your work to clean up our air has become more important than ever, as it supports respiratory health and enables active travel. Please see below for some of the work the GLA has been doing to progress reductions in air pollution, and to respond to air quality issues raised by the pandemic.

- **Borough-led Monitoring:** It is important that boroughs continue to prioritise monitoring and reducing pollution wherever possible. We worked to ensure that maintaining the automatic monitoring network was classed as essential work by the Government during lockdown. We have provided letters to this effect for the organisations running the network, as well as for boroughs who undertake their own calibrations. During lockdown we also agreed some advice with Defra and the other devolved authorities which provided flexibility around the setting out of NO₂ diffusion tubes, where this could not be done safely.
- **GLA evaluation of lockdown impacts:** A few weeks into lockdown we produced [a report](#) which details the impact of lockdown on pollution concentrations. The report demonstrates

how reduced traffic added to the benefits already delivered by the ULEZ in terms of NOx reductions. However, the increase in PM2.5 concentrations highlight the need to urgently address non-road sources, an area in which the boroughs have a very important role to play. We are requesting more powers from Government to help tackle these sources at both a regional and local level (see Environment Bill section below).

- **LLAQM statutory duties:** We have suspended Cleaner Air Borough applications until next year and provided some flexibility around deadlines for the submission of your statutory reports in light of the pressures faced as a result of the pandemic. Many thanks to all the boroughs who managed to get their reports in by the May deadline. All of the latest templates and supporting documents for the LLAQM are [available here](#). We plan to deliver another of our air quality seminars virtually in early autumn, which we would encourage relevant borough officers to attend.
- **Charging Schemes:** At the start of the crisis we temporarily suspended Congestion Charging, the Low Emission Zone (LEZ) and the Ultra Low Emission Zone (ULEZ) to enable essential deliveries and for key workers to drive to work. These charging schemes have since been reinstated to prevent excess traffic and pollution, but with a reimbursement options for NHS and care home workers. There are a number of changes to these schemes as a result of the crisis:
 - From the 22nd June the Congestion Charge increased to £15 and its hours of operation extended to 7am-10pm 7 days a week. This will help to cut pollution and increase available space on the streets of central London for walking and cycling.
 - The tighter standards for heavy vehicles in the London-wide LEZ will come into force on the 26th October 2020 as planned, but [no new charges or penalties will be levied until the end of February 2021](#). This is to give the freight industry more time to meet the new standards as it is currently managing the intense demands from the coronavirus pandemic.
 - There are no changes to the central London ULEZ, which has proven to be incredibly effective, reducing roadside concentrations of NOx by a third. The Mayor is fully committed to ULEZ expansion in October 2021, it is a critical for bringing London's pollution down to legal and safe levels, and to protect respiratory and heart health.
- **Streetspace Plan, School Streets and safe travel to school:** To support social distancing and a safe return to work, the Mayor is working with the boroughs to deliver his new Streetspace Plan which will remove traffic in a number of locations to provide more space for walking and cycling. TfL are also working with schools and boroughs to embed new ways of getting to school that are safe and sustainable, including rolling out more School Streets. We encourage you to deliver as many School Streets as possible to maximise reductions in child exposure to air pollution. TfL has produced guidance on School Streets which is [available here](#).
- **Breathe London:** GLA officers plan to monitor air quality impacts of the Streetspace Plan, including the additional School Streets, using sensors from the Breathe London network and will work with boroughs to identify the most appropriate locations to undertake this monitoring. Some of the biggest improvements in air quality will be delivered at schools on busier roads with ambitious closures. These schools will be prioritised for monitoring. City Hall also encourages boroughs to use their own monitors to measure the air quality impact

of School Streets through diffusion tubes and will work with boroughs wishing to do so. For further information please contact: airqualitylondon@london.gov.uk.

- **Non Road Mobile Machinery Low Emission Zone (NRMM LEZ):** The next phase of the NRMM LEZ is due to come into force on 1st September. Not only will this raise the standards for all NRMM subject to the LEZ it will also expand the areas where tighter standards apply to include Opportunity Areas.

While the GLA are confident that construction sites will be able to comply with the current standards as they return to work, it has become apparent that meeting the new standards in September may be more challenging. This is because factories producing newer model construction equipment and the retro-fit systems needed to meet the new standards have been closed or running at reduced capacity. At the same time, potential project overruns arising from the lockdown period and future slower working conditions mean that some equipment cannot be redeployed as expected.

To mitigate the effects of this the GLA will be introducing a new type of exemption which will be available for new deployments between September this year and February 2021. The exemption will allow machines to be used if they meet the previous standard in that zone but, unlike other exemptions, is not transferable from site to site. Retrofitted machines will still have to meet the new standards.

- **Environment Bill:** We are continuing to lobby for some of the changes needed to make sure that this is useful and ambitious legislation. Any lobbying action from yourselves or through your networks would be helpful. Our key asks relating to air quality are:
 - Inclusion of the World Health Organization guidelines for PM_{2.5} as an explicit target included in the Bill to be met by 2030 at the latest. As drafted, the Bill only requires that a target for PM_{2.5} must be set by 2022 and be achieved by a date 15 years after that.
 - Simplification of the new civil offences (fines) for smoke control area offences and making it an offence to use a non-approved appliance. The current proposals mean that in order to issue a fine for smoke offences, the Council must issue two separate notices, each with their own appeal period and procedure, for a maximum penalty of £300. In our view this is unlikely to make it easier for willing boroughs to reduce solid fuel emissions.
 - Refinements to the “Clean Air Partners” concept to include a strategic role for the Mayor (and other Metro Mayors elsewhere in England). This would allow the Mayor, in concert with the boroughs, to help facilitate co-operation between the boroughs and authorities such as Highways England or the Environment Agency on a Londonwide basis. This would reduce the need for each borough to negotiate independently for co-operation from these agencies and also encourage coordinated Londonwide action.
- **Mayor’s Air Quality Fund (MAQF):** As you are no doubt aware this is an extremely challenging time for TfL’s finances. However we are delighted that the majority this fund has been secured for at least the rest of this year.

Kind regards,



Philip Graham
Executive Director
Good Growth

Comments on the London Borough of Southwark's Annual Status Report

1. The London borough of Southwark has provided a detailed ASR that uses the standard template and covers the required content.
2. The AQMA is declared for exceedances of the annual mean NO₂ and 24-hour mean objective for PM₁₀.
3. There are currently four automatic monitoring stations within the borough that each monitor NO_x, NO₂, PM₁₀ and PM_{2.5}. Monitoring of Ozone is completed at one monitoring location (SWK 6)
4. Passive monitoring of NO₂ using diffusion tubes was completed at 90 locations during 2020, including two co-located triplicate sites.
5. It was noted that COVID-19 generally had a limited impact with regards to diffusion tube changeovers/data capture, apart from at the primary school location(s), which are managed by the school themselves and saw data capture rates of 42%.
6. Within Table D of the report there are no reported exceedances of the annual mean objective for NO₂. However, there are four reported exceedances within Table R. In 2019, there were 16 monitored exceedances. The reduction is likely due to the effects of the COVID-19 pandemic and associated lower levels of traffic.
7. All monitored exceedances prior to distance correction during 2020 as reported in Table R were located within the designated AQMA. There are no reported instances where the annual mean concentration was in excess of 60µg/m³ indicating a possible exceedance of the 1-hour NO₂ objective.
8. There are inconsistencies between the results in Table D, Table Q and Table R for the monitored NO₂ concentrations. For example, at SDT24, the bias adjusted results is 41.7µg/m³ and distance corrected result is 38.0µg/m³ in Table Q. In Table R, the result is 43.0µg/m³ for

the non-distance corrected result and Table D gives a concentration of 38.8µg/m³ for the distance corrected result. As this is close to the annual mean NO₂ objective, it is recommended that all diffusion tube monitoring results within the ASR are reviewed and where required updated before the ASR is approved.

9. Details of Annualisation of SWK 5 have not been provided, though there was less than 75% data capture for the year. Annualisation of this automatic monitoring site should be completed in line with Box 4.2 of LLAQM TG(19).
10. The automatic monitoring sites within the borough did not record any exceedances of either of the 1-hour mean NO₂ the 24-hour PM₁₀ objectives. Compliance with the 24-hour PM₁₀ objective has been achieved within the borough for over seven consecutive years, therefore as per LLAQM.TG(19) guidance the possible revocation of the AQMA designation for 24-hour PM₁₀ should be reviewed.
11. Feedback provided for the ASR for 2020 regarding the correct bias adjustment and distance correction methodology has been observed, with a local adjustment factor being derived but the national factor being used due to limited data capture.
12. Updates on all current measures within the existing AQAP have been included within Table J, with details provided on all measures where relevant. Understandably, COVID-19 has had an effect on the progression of some of these measures, notably those inclusive of works with schools, and encouragement of staff to use sustainable transport to get to offices. However, the majority of AQAP measures saw little/no impact, and several actions were able to be completed or amended
13. There is a discussion with regards to a data comparison from 2019 and 2020, with reference to the lockdown periods during 2020 at monitoring location SD15. This highlighted the reduction from March onwards in NO₂. This commentary is welcomed.