

GREATER **LONDON** AUTHORITY

Good Growth

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Department: Good Growth

Date: 13/07/2020

Dear Kevin,

Thank you for submitting your Annual Status Report (ASR) for 2019 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** for all sources and pollutants.

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 the next 6 months at least, although this is subject to final confirmation in July. Work to establish the potential impact of the current crisis on the MAQF is an ongoing and evolving process. We will keep you informed as it develops, and thank you for your input on impacts of the current crisis on your outputs and spend. We thank you for your patience and support with this process.

Kind regards,



Philip Graham
Executive Director
Good Growth

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

1. The council has provided a detailed ASR that covers the required content.
2. London Borough of Southwark declared an Air Quality Management Area (AQMA) in 2003 for exceedance of the annual mean objective for NO₂ and the 24-hour mean objective for PM₁₀, citing road traffic as their primary source of concern. The AQMA does not currently encompass the entire borough.
3. Automatic monitoring was undertaken at 3 sites during 2019, covering both roadside and urban background exposure types. The council have also detailed plans to implement additional automatic monitoring stations at several locations, which is commended. Inclusion of a map showing the proposed new monitoring locations is a useful visual aid.
4. The borough has included maps of current and proposed monitoring locations, which is commended, however the addition of labels corresponding to the IDs provided in Table C is encouraged.

5. Trends in monitoring data are discussed, and annual mean NO₂ and PM₁₀ data from the council's monitoring sites are also displayed graphically, which is commended. Included within the discussion of trends are graphs of the London mean roadside and London mean background particulate matter concentrations. The council are encouraged to continue to provide a detailed discussion of their monitoring data and may also wish to include additional graphs to highlight the trends in non-automatic monitoring data in addition to what is already provided. This would provide a more in-depth insight into borough-wide trends and show progress made.
6. Non-automatic monitoring was undertaken via a network of 88 diffusion tubes at 83 sites across the borough. Comparison of monitoring results to national air quality objectives has been provided. There are 34 exceedances of the annual mean objective for NO₂, of which 5 of these exceed 60 µg/m³, indicating a likely exceedance of the short-term mean objective for NO₂ in these locations. Careful consideration should be given to the specific management of air quality in these areas. The 1-hour mean objective for NO₂ has not been exceeded at any site, with all sites recording 0 hourly means >200 µg/m³.
7. It would appear that there is one exceedance outside of the AQMA, SDT 98 monitoring 48.96 µg/m³. The council could therefore consider the introduction of additional monitoring sites in this area to determine the extent of the exceedance, and should the exceedance persist, seek to develop and implement actions to tackle this exceedance. An expansion of the AQMA boundary could also be considered in the event the exceedance persists.
8. Long-term trends are provided where available, however the council have not provided within the main body of the text the results at each monitoring site for 2019, and instead have presented this for the first time within the appendix. In accordance with the current prescribed template, the bias-adjusted and distance-corrected results for all sites should be presented in the main body of the report. It is important that this be rectified.
9. The borough has developed actions to tackle air quality in each of their GLA AQFAs, which is to be commended.
10. Table I: Delivery of Air Quality Action Plan Measures has been completed in significant detail and contains all key measures outlined within the LLAQM Borough Air Quality Action Matrix. The borough has provided a detailed progress update for the majority of measures within their AQAP, and have indicated any delays in implementation and also highlighted the success of many measures. This is to be commended, and this level of detail and commitment is encouraged for all future reports.
11. During 2019 the Council have made substantial progress on many of their AQAP measures. Of note:
 - a) Vehicles in the Authority's Fleet were renewed during 2018 and 2019 with electric and ULE compliant vehicles;
 - b) The Authority has increased the number of TfL STARS Gold accredited by 17 schools, resulting in 31 Gold accredited schools in the Borough;
 - c) A third monitoring station was added at Tower Bridge Road during July 2019. Two of the AQMS collected >90% for NO₂. For E & C & OKR sites the collection of PM₁₀ fell just below the target at 89% and 86% respectively. The existing equipment is old and

is increasingly difficult to maintain and service, and there are plans in place to replace all existing equipment during 2020 and a further 3 stations are to be added to the network.

- d) Web-based information updated in September 2019. Air Quality is to be included in public health's new digital health and wellbeing hub which is currently in development.

12. The report states that QA/QC of monitoring data has been carried out, and brief details have been provided. The Council have not however provided sufficient evidence for all procedures, in particular bias adjustment factor calculation. The report is unclear and does not specifically state which factor has been applied to the results, however brief calculations by the appraiser indicate the national factor of 0.93 was utilised; evidence showing the derivation of this factor is not provided. It is however possible that this evidence has been omitted in error, as the report states it to be within section 1.2, but this is not the case. The stated factor matches that in Diffusion Tube Bias Adjustment Factors Spreadsheet for March 2020 for the lab and preparation method selected by Southwark. The Council are required to include supporting evidence for national and/or local bias adjustment factor calculation, in the form of screen captures of the respective completed spreadsheets. This must be rectified in all future reports.
13. The council note that there are several co-location studies ongoing within the borough, and therefore may wish to consider calculating a local bias adjustment factor, as this may provide a clearer indication of air quality within the Borough. The provision of both factors and supporting discussion and justification of choice is an example of good practice and is therefore to be encouraged where co-location studies are possible.
14. The council have identified two new or significantly changed industrial/other sources of air pollution within the borough in 2019 and have provided a brief overview of these. This is useful and to be commended.
15. 15 of the council's non-automatic monitoring sites had a data capture of <75%, of which 4 sites ha only 2 months of data for 2019 and therefore do not have sufficient data for calculation of an annual mean. The Council have annualised the data from these sites in accordance with LLAQM TG16, however the four sites with only two months of data - SDT123, SDT124, SDT125 and SDT127 - have also been annualised, which is incorrect and potentially misleading. Where less than 3 months of data are collected, the Council must state that annualisation cannot be carried out due to insufficient data, and therefore the results must be viewed with caution. Supporting discussion and example calculations for annualisation have been provided, however individual calculations for each site would be useful.
16. Distance correction has been carried out, however results are not provided for all sites. Additionally, the inclusion of supporting calculations (screen captures of the LAQM tool) for all sites where distance correction has been calculated have not been provided. This should be included in next year's ASR.