

# London Borough of Lambeth Air Quality Action Plan 2023-25



## Summary

This Air Quality Action Plan (AQAP) sets out the concrete steps the council will take to implement the Air Quality Vision, adopted by the council in 2021. This vision commits the council to pursuing more ambitious, longer term air quality targets, breaking the association between inner-London living and poor air quality, and targeting resources and interventions to benefit the most susceptible groups: the young, the elderly, those with a pre-existing health condition, and residents in the most polluted areas.

These commitments were reaffirmed in 2022 with the adoption by the council of its Climate Action Plan. This was shaped by Lambeth residents through its Citizens' Assembly on the Climate Crisis, and an online public consultation. Climate change and air pollution are distinct issues, but closely related. The major sources of carbon emissions in Lambeth (energy use in buildings and transport) are also responsible for emitting local pollutants like particulate matter and nitrogen dioxide. Further, heat waves associated with climate change can increase the severity of health conditions caused by air pollution, like asthma, bronchitis and COPD. Therefore action to tackle the climate emergency will also lead to improved air quality and better public health outcomes.

Out of the Climate Action Plan, we have developed Lambeth's first climate partnership, bringing together the borough's large public, private and third sector organisations to work together to oversee the development and implementation of the Climate Action Plan.

This Air Quality Action Plan has been produced as part of our duty to London Local Air Quality Management. It outlines the action we will take to improve air quality in the London Borough of Lambeth between 2023 and 2025.

This action plan replaces the previous action plan which ran from 2017 to 2022. Highlights of successes under the previous action plan include:

- Overseeing a 62% reduction in NO<sub>2</sub> levels at Brixton Road, a 52% reduction at Vauxhall, and a 30% reduction at Streatham Green, compared to 2014 levels
- Installation and operation of a comprehensive network of 115 diffusion tubes across the borough, to provide monthly averages of NO<sub>2</sub> levels, and maintenance of 3 automatic monitoring stations
- Implementation of Low Traffic Neighbourhoods
- Agreement of the Transport Strategy
- Adoption of the Lambeth Local Plan 2021, which provides an up-to-date development plan for Lambeth alongside the Mayor's London Plan 2021
- Implementation of over 20 school streets
- Delivery of a pan-London project to reduce construction site emissions from non-road mobile machinery, and appointment of a construction impact monitoring officer

- Supporting community organisations to deliver local greening projects
- Close engagement with Business Improvement Districts including delivery of electrification and freight consolidation projects
- Awareness raising through the promotion of AirText, public events and engagement during Clean Air Week, and anti-idling and wood burning communication campaigns

Air pollution is associated with a number of adverse health impacts, it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas<sup>1,2</sup>.

According to a report commissioned by the GLA in 2017, areas with a high proportion of black/African/Caribbean/Black British, Mixed/ Multiple and Other ethnic groups were more likely to experience higher levels of nitrogen dioxide pollution. Research commissioned by Impact on Urban Health has identified the Output Areas in Lambeth that combine high exposure to air pollution, with high levels of vulnerability to air pollution, in which vulnerability is defined as areas with higher concentrations of the young and elderly, higher concentrations of residents with lung and heart conditions, and the presence of schools. It is residents in these areas that will be benefited most by policies to improve air quality.

The annual health cost to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion<sup>3</sup>. Lambeth council is committed to reducing the exposure of people in Lambeth to poor air quality in order to improve health.

For this AQAP, we have classified actions according to the major local sources of pollution, and cross-cutting themes to reduce pollution and exposure to pollution. These are:

## **1. Reducing pollution from transport**

### **1.1. Council fleet and commissioned transport services**

Reducing pollution from vehicles the council owns/leases and operates, and transport services from contractors procured by the council

### **1.2. Transport planning, policy and infrastructure:**

Investment in infrastructure, adoption of policy, project delivery and decision making, that reduces pollution from motor vehicles by making streets safer for cycling and walking, promoting public transport, facilitating electrification, and discouraging car journeys and car ownership, particularly in sensitive locations around schools and healthcare settings.

## **2. Reducing pollution from construction**

### **2.1. Planning policy and guidance**

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<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

<sup>3</sup> Defra. Air Pollution: Action in a Changing Climate, March 2010

Prioritising air quality in the planning system to reduce air pollution from construction sites

**2.2. Enforcement and public protection**

Enforcing conditions attached to planning approvals to ensure that air quality standards are met on construction sites

**3. Reducing indoor and outdoor air pollution from energy use in buildings**

**3.1. Council-owned residential and non-residential buildings**

Reducing pollution from heating and cooking with natural gas in homes, corporate, commercial and community buildings owned by the council

**3.2. Policy, support and communication**

Encouraging and enabling Lambeth residents, institutions and businesses to invest in clean energy in their buildings, and avoid the most polluting forms of energy like burning wood

**4. Reducing pollution from other sources**

Tackling pollution from sources such as events, machinery and waste, and damp, mould and chemical sources of indoor pollution

**5. Reducing exposure to pollution**

Investing in green infrastructure, green spaces and better design, as well as ventilation and other mechanical measures, to reduce exposure to pollution

**6. Monitoring and modelling air quality**

Developing an advanced air quality information service that provide accurate, up-to-date, accessible and useful information on air quality across the entire borough

**7. Public information, awareness raising**

Improving the council's communications on outdoor and indoor air quality to help residents make healthier choices

**8. Collaboration and stakeholder engagement**

Enabling, empowering and collaborating with residents, local institutions and businesses to drive up air quality together

The complete set of actions to be taken by the council are set out in Table 4.1. Of these, the council will prioritise the following seven actions. Progress on these priority actions will be reported on separately each year through the council's Annual Status Report.

1. Develop an advanced air quality information service.
2. Pilot a construction emissions alert and response system, in which construction emission spikes from major developments trigger an enforcement response. Fully develop this system, subject to results of the pilot.
3. Work with local communities to reduce emissions in neighbourhood areas through the council's Low Traffic Neighbourhood programme as part of a wider strategy to reduce traffic across the borough.
4. Work towards integrating local air quality targets on NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, as set out in Lambeth's Air Quality Vision, into the next iteration of the Local Plan.
5. Review Lambeth's Responsible Procurement Policy with a view to introducing a mandatory electric vehicle component for all contracts over £100k in which

transport is a major element, stepping up to a 100% electric vehicle requirement over time.

6. Work with businesses, institutions and other stakeholders across the borough to develop a Clean Air Pledge, working together to drive down pollution.
7. Recruit for and launch an Air Quality Community Forum, comprising residents and local stakeholders, to help shape the council's approach to tackling air pollution, and hold the council to account for its progress towards its air quality targets.

In this AQAP we outline how we plan to effectively use local levers to tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and so we will continue to work with and lobby regional and central government on policies and issues beyond Lambeth's influence.

The production of this draft AQAP has been informed by an online pre-consultation processes, to which the council received over 234 responses. This will be supplemented by extensive engagement on this draft version with communities, institutions, businesses and other stakeholders throughout the formal consultation period.

### **Responsibilities and commitment**

This draft AQAP was prepared by the Climate Change and Sustainability Team at Lambeth Council with the support and agreement of the following teams:

Public Health, Planning, Public Protection, Housing, Transport, Environment and Streetscene, Parks, Waste, Events, Procurement. Fleet Management

This draft AQAP has been approved for publication by the council's Management Board, and by Councillor Rezina Chowdhury, Cabinet Member for Sustainable Lambeth and Clean Air

This AQAP will be subject to an annual review, appraisal of progress. Progress each year will be reported in the Annual Status Reports produced by Lambeth, as part of our statutory London Local Air Quality Management duties.

If you have any comments on this AQAP please respond through the council's consultation page, at <https://cleanairlambeth.commonplace.is/proposals/lambeths-air-quality-action-plan/>

You can also write directly to the council's Climate Change and Sustainability team at [xdessustainability@lambeth.gov.uk](mailto:xdessustainability@lambeth.gov.uk)

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## Abbreviations

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
EV	Electric Vehicle
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 <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London

## Foreword

To be added to final version

## Introduction

This report outlines the actions that Lambeth council will deliver between 2023 and 2025 in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough.

It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the London Local Air Quality Management statutory process<sup>4</sup>.

### 1. Summary of current air quality in Lambeth

In recent years air quality has improved significantly in Lambeth. On Brixton Road, nitrogen dioxide pollution has more than halved since 2014.<sup>5</sup> The number of state primary and secondary schools exceeding legal levels of nitrogen dioxide has fallen from 19 to 2 between 2016 and 2020.<sup>6</sup> However, air quality remains at dangerous levels across the borough, with both short and long-term effects. It is estimated that each year, air pollution kills over 100 Lambeth residents<sup>7</sup> and causes over 750 emergency hospital admissions from lung and heart disease.<sup>8</sup> It has been estimated that particulate air pollution has contributed approximately 15% to Covid-19 mortality.<sup>9</sup>

The UK Clean Air Strategy released in 2019, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The Strategy objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.

Lambeth is meeting all of the national objectives other than for the gas Nitrogen Dioxide (NO<sub>2</sub>). Lambeth is meeting the current objectives for Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>). However, for most air pollutants, the EU air quality standards are less strict than the World Health Organisation 2005 air quality guidelines. There is a large body of evidence that EU air quality standards need to be strengthened to protect public health. The coroner's report into the death of Ella Adoo Kissi-Debrah concluded that

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<sup>4</sup> LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-andair-quality/working-boroughs>

<sup>5</sup> [https://www.lambeth.gov.uk/sites/default/files/projects\\_attachments/lambeth-air-quality-annual-status-report-2019.pdf](https://www.lambeth.gov.uk/sites/default/files/projects_attachments/lambeth-air-quality-annual-status-report-2019.pdf)

<sup>6</sup> <https://www.london.gov.uk/press-releases/mayoral/dramatic-improvement-in-londons-air-quality>

<sup>7</sup> [http://erg.ic.ac.uk/research/home/resources/ERG\\_ImperialCollegeLondon\\_HIA\\_AQ\\_LDN\\_11012021.pdf](http://erg.ic.ac.uk/research/home/resources/ERG_ImperialCollegeLondon_HIA_AQ_LDN_11012021.pdf)

<sup>8</sup> <https://s3-eu-west-2.amazonaws.com/commonplace-customer-assets/lambethclimateaction/Lambeth%20Annual%20Public%20Heath%20Report%202020.pdf>

<sup>9</sup> <https://academic.oup.com/circovasces/article/116/14/2247/5940460>



while “there is no safe level for Particulate Matter...WHO guidelines should be seen as minimum requirements. Legally binding targets based on WHO guidelines would reduce the number of deaths from air pollution in the UK”.

National Air Quality Objective (AQO) values for PM10, PM2.5 and NO2 are summarised below:

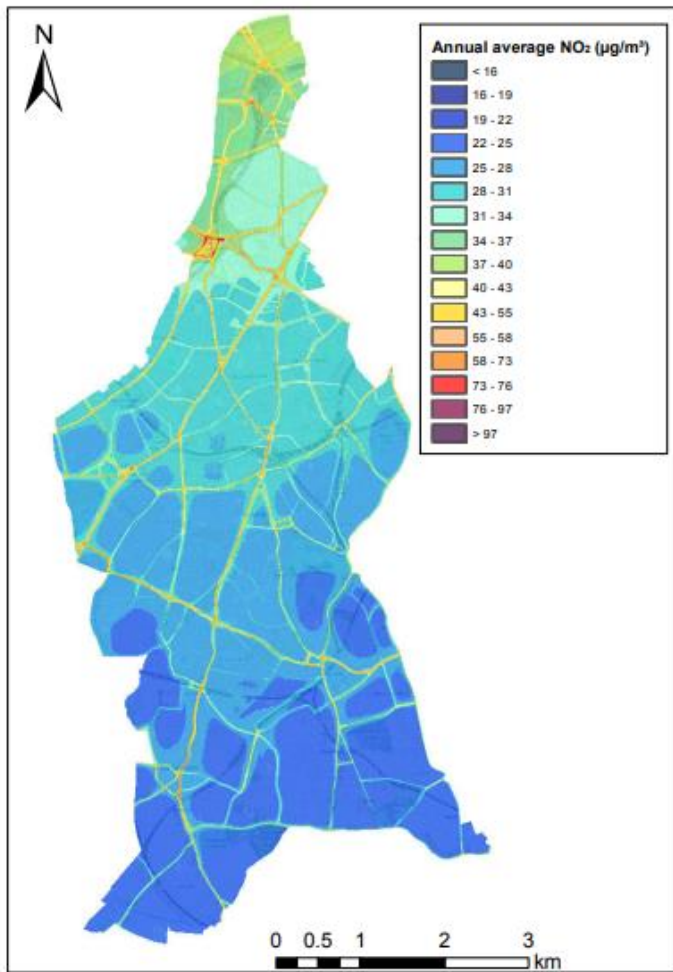
- Particulate Matter (PM10) annual mean: 40 µg/m<sup>3</sup>
- Particulate Matter (PM2.5) annual mean: 25 µg/m<sup>3</sup>
- Nitrogen Dioxide (NO2) annual mean: 40 µg/m<sup>3</sup>

In 2020, Lambeth council adopted more ambitious target values for air quality, with the council committing to do everything in its power to meet:

- World Health Organisation Interim Target 4 for PM10 (20 µg/m<sup>3</sup>) ahead of 2030
- World Health Organisation Interim Target 4 for PM2.5 (10µg/m<sup>3</sup>) ahead of 2030
- World Health Organisation Interim Target 2 (30µg/m<sup>3</sup>) for annual mean levels of Nitrogen Dioxide by 2030.

Lambeth council also adopted a long-term objective of achieving World Health Organisation recommended pollution levels, and reviewing air quality targets every three years, adjusting to more ambitious targets where air quality data suggests targets will be exceeded/achieved earlier than planned.

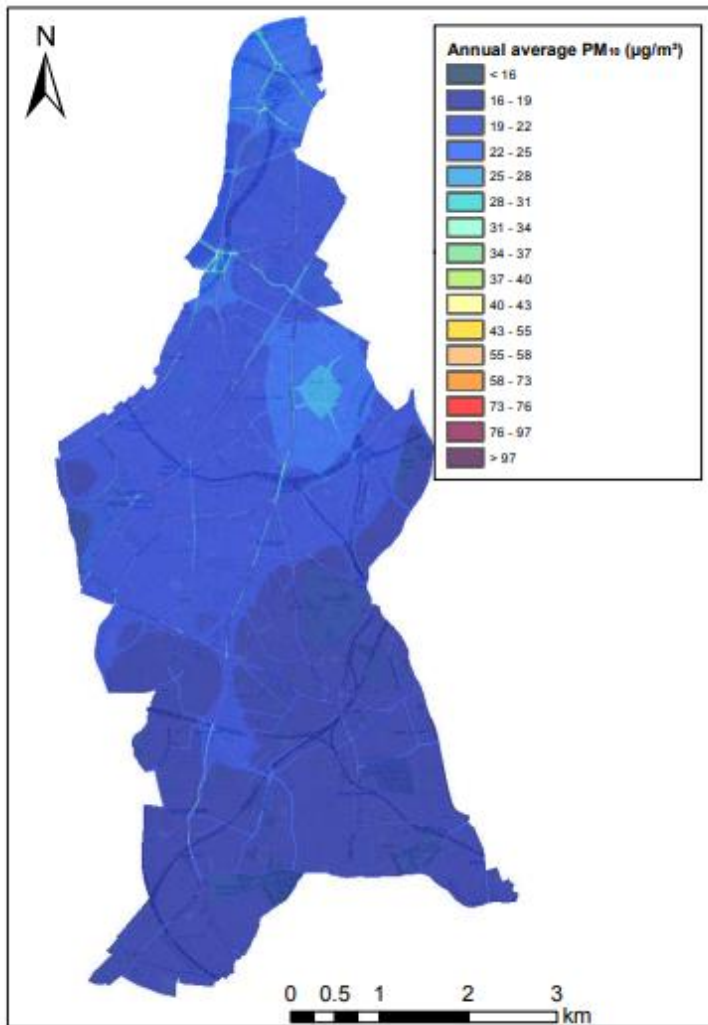
Figure 1 Modelled map of annual mean NO<sub>2</sub> concentrations<sup>10</sup>



This map shows that while annual average NO<sub>2</sub> levels across much of Lambeth are within legal limits (40 µg/m<sup>3</sup>), pollution is significantly worse to the north of the borough in the Waterloo and Vauxhall areas, where legal limits are breached. This is also the case for principal roads through Lambeth – the A3, A23, A24, A202, A205, A214, A301 and A302. The majority of principal roads in Lambeth are controlled by TfL.

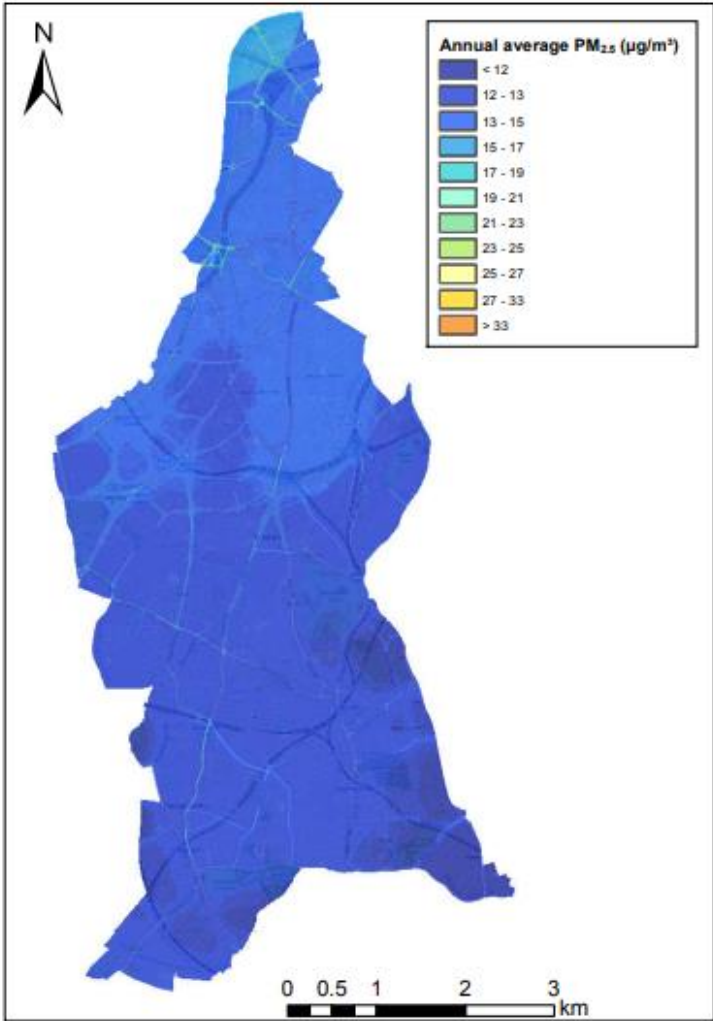
<sup>10</sup> Carried out using the ADMS-Urban (version 5.0.0.1) dispersion model and the emissions inventory toolkit EMIT, both developed by CERC. Pollutant emissions from vehicles were calculated with activity data from the Department for Transport (DfT) and London Atmospheric Emissions Inventory (LAEI 2016). The emission factors were taken from the latest Department for Environment, Food and Rural Affairs (Defra) Emission Factor Toolkit (EFT v 10.1), modified to account for emission factor uncertainty in urban driving conditions. LAEI traffic flows for 2016 were adjusted to 2019 using DfT traffic counts. Traffic speeds were derived from LAEI 2016 speed data.

Figure 2 Modelled map of annual mean PM<sub>10</sub>



This map shows that the vast majority of Lambeth is within legal limits for PM<sub>10</sub> (40 µg/m<sup>3</sup>), with just a few locations close to the busiest roads approaching legal limits.

Figure 3 Modelled map of annual mean PM<sub>2.5</sub>



This map shows that the air quality objective of 25 µg/m<sup>3</sup> for annual average PM<sub>2.5</sub> concentrations is met across the borough, for 2019.

## 1.1 AQMAs and Focus areas

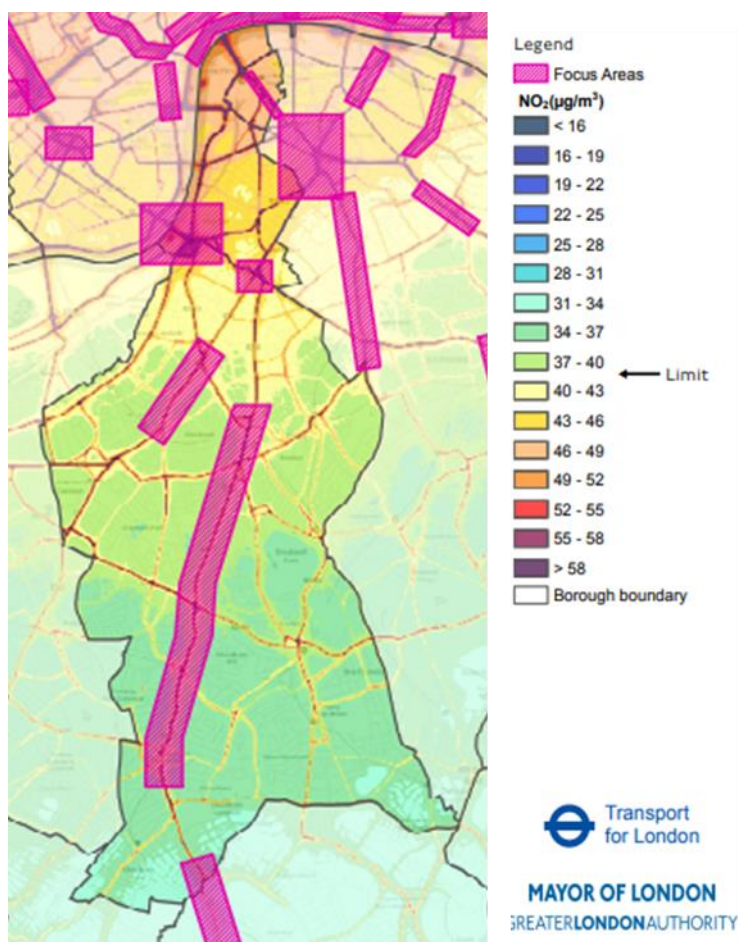
The whole of Lambeth was declared as an Air Quality Management Area (AQMA) in 2007 for the pollutants of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>).

An Air Quality Focus Area is a location that has been identified as having high levels of pollution and human exposure. There are 7 focus areas within Lambeth's borders. These are:

1	A23 from Brixton to Streatham
2	Kennington Oval/Camberwell New Road (A202)/Kennington Park Road (A3)
3	Vauxhall Cross
4	Clapham Road (A3)
5	Waterloo Road
6	Cotton Gardens/Knights Walk/A3204
7	A23 Streatham High Rd/Green Ln

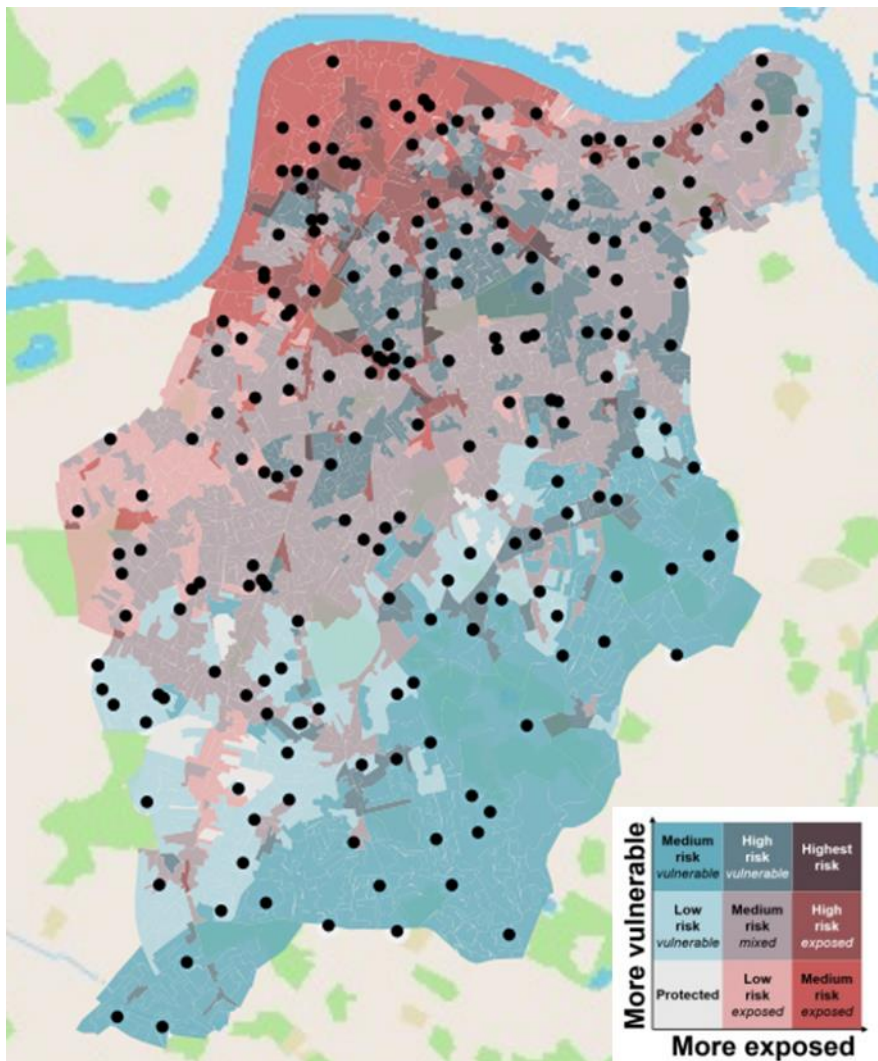
The majority of the above routes are managed by TfL. We will prioritise these areas when developing and implementing actions listed in this plan wherever relevant.

Figure 4 Air Quality Focus Areas in Lambeth (LAEI 2016)



Research commissioned by Impact on Urban Health has identified the 'highest risk' areas of the borough, though analysis of pollution exposure data and vulnerability, calculated according to demographic data on age, the prevalence of underlying health conditions and the location of schools. As illustrated by Figure 5 below, the highest risk areas of Lambeth are to the north of the borough, between the Vauxhall and Waterloo areas.

Figure 5 Risk of Air Pollution in Lambeth and Southwark<sup>11</sup> with school locations indicated by dots



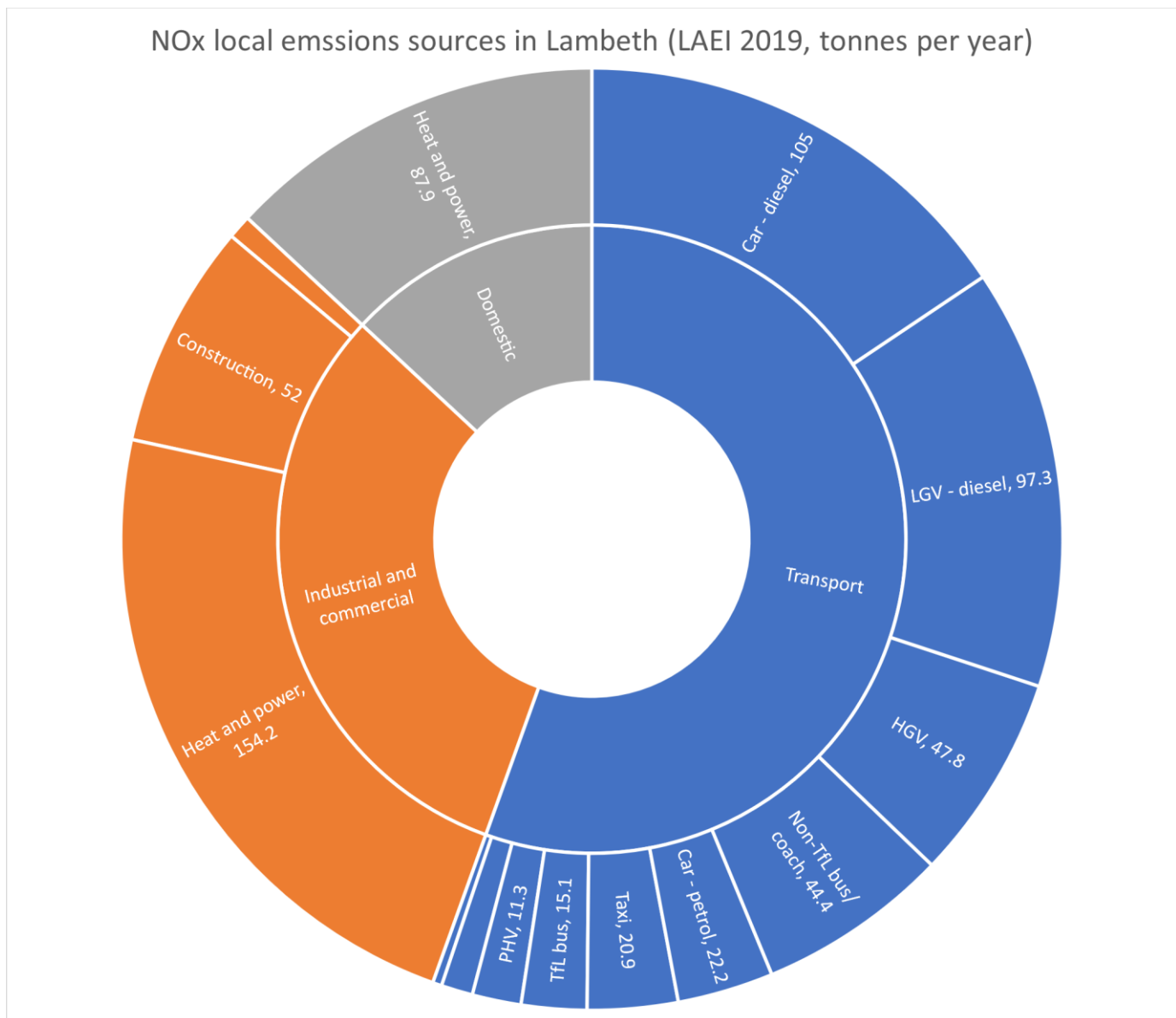
## 1.2 Sources of Pollution in Lambeth

Pollution in Lambeth comes from a variety of sources, though road transport, construction and energy use in the home are responsible for the vast majority of local emissions. Sources include pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

<sup>11</sup> Developed by Advance Pro Bono for Impact on Urban Health.

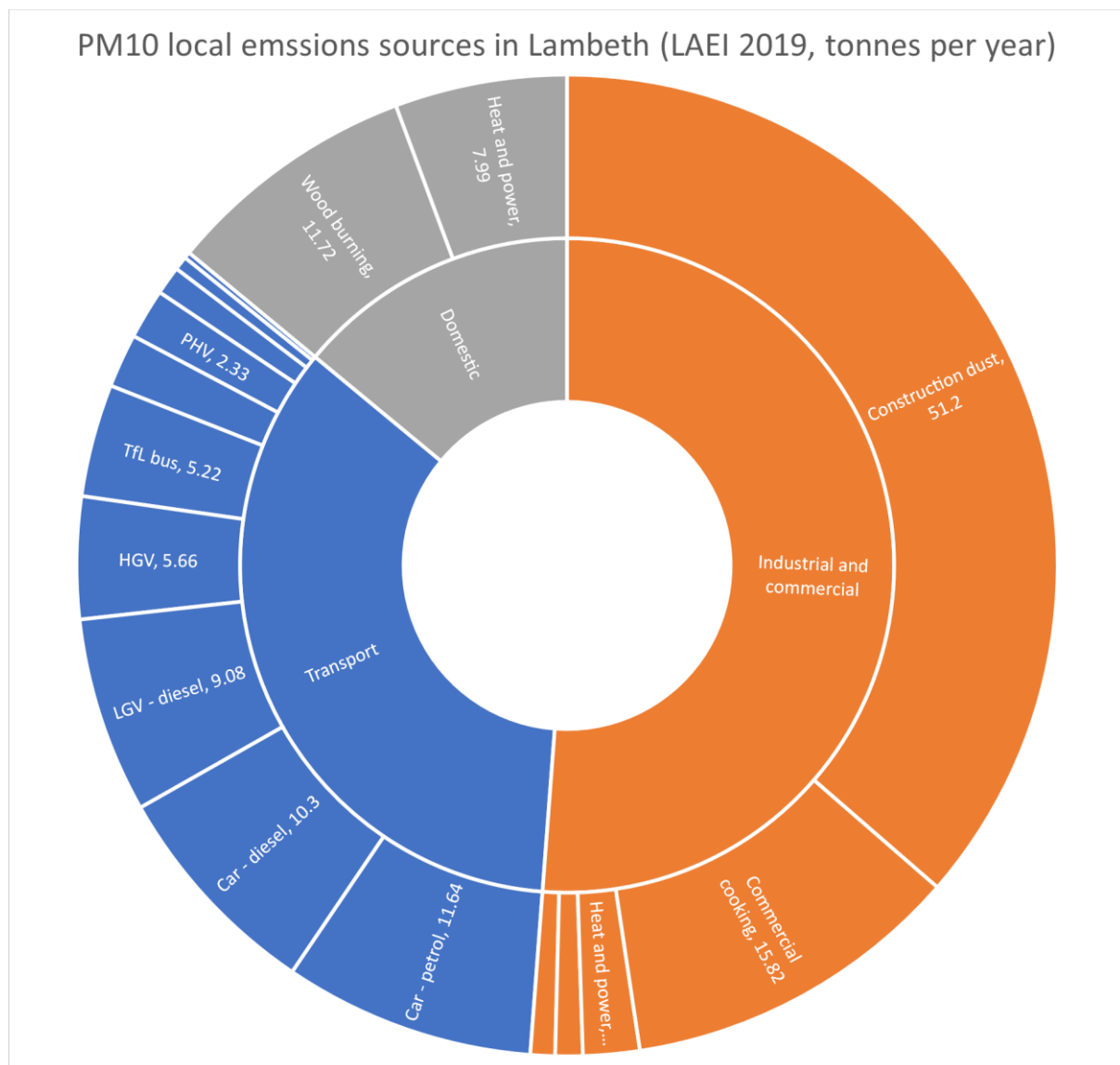


Figure 6 NOx Emissions by category and sub-category (from the LAEI 2019)



Of the NOx pollution that originates in Lambeth, the main sources are petrol and diesel vehicles (54%), and burning natural gas in buildings for heating and cooking (33%).

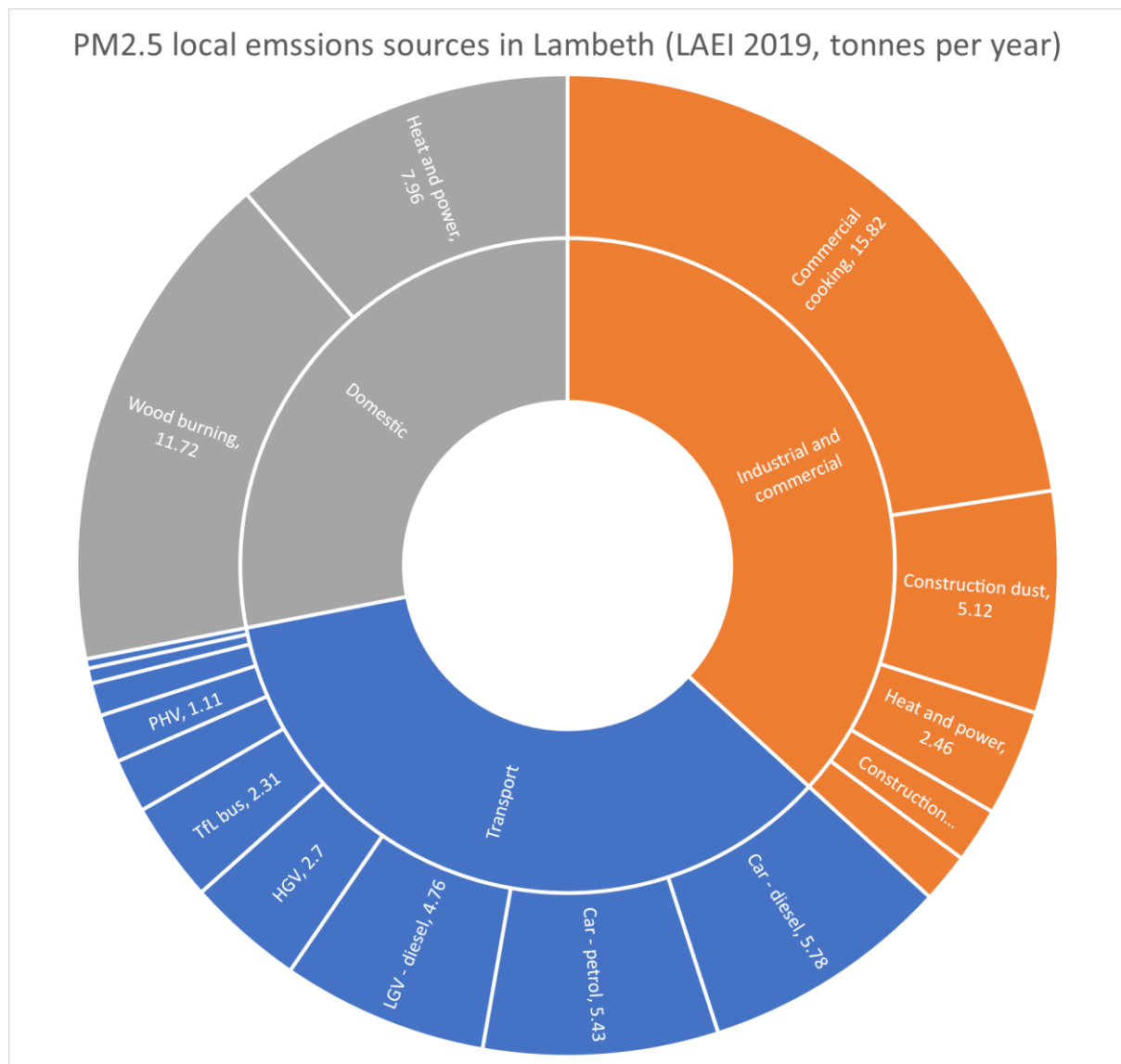
Figure 7 PM<sub>10</sub> Emissions by category and sub-category (from the LAEI 2019)



Of the PM<sub>10</sub> pollution that originates in Lambeth, the main sources are dust from construction and demolition sites (30%), and road transport (28%). It is worth noting that residents closest to construction sites will be disproportionately affected by PM<sub>10</sub> pollution. Petrol and diesel vehicles are responsible for the vast majority of PM<sub>10</sub> emissions from road transport. However electric vehicles, while less polluting, also contribute to PM<sub>10</sub> pollution from tyre wear and braking, and will become a larger source of pollution as they form a greater percentage of on-road vehicles.



Figure 8 PM<sub>2.5</sub> Emissions by source and vehicle type (from the LAEI 2019)



Of the PM<sub>2.5</sub> pollution that originates in Lambeth, sources are split relatively evenly between industrial and commercial (35%), transport (34%), and domestic (27%). Wood burning in the home is a major source of PM<sub>2.5</sub> pollution (16%), larger than PM<sub>2.5</sub> pollution from petrol and diesel cars (15%). This is despite relatively few households burning wood indoors. It is also worth noting the significant share of PM<sub>2.5</sub> pollution for which commercial cooking is responsible (21%).

Nearly half of PM<sub>2.5</sub> pollution in London comes from outside of London, so reducing pollution levels will require coordinated work nationwide and across Europe.

### 1.3 Lambeth's Air Quality Priorities

As set out in its Air Quality Vision, Lambeth's ambition is to break the association between inner-London living and poor air quality. We believe that everyone has the right to clean air, and we want Lambeth to be a case study in how to drive down pollution in a dense urban area.

Covid-19 has also illustrated that public health crises do not fall equally across the population. Air pollution is no different, hitting the young, the elderly and those in poor working and living conditions hardest. The death of Ella Adoo-Kissi-Debrah is evidence of the terrible impact air pollution can have on children's health. Further, there is a strong correlation between air quality impacts and socio-economic inequalities. Those on low incomes tend to live in places where they are more exposed to air pollution.

That is why Lambeth will prioritise improving air quality for those most exposed and most vulnerable to the health impacts of air pollution. We want to ensure that resources and interventions are targeted to benefit the most susceptible groups: the young, the elderly, and those with a pre-existing health condition, and residents along the most polluted roads. We want to reduce air pollution and exposure to air pollution at a faster rate around sensitive locations than the borough average.

As set out above, the major sources of pollution in Lambeth are transport, construction and energy, and this Air Quality Action Plan is structured to focus efforts on mitigating emissions in those sectors. At the same time, we acknowledge the cross cutting themes that are essential to mobilise action: access to good data and information, public awareness, and the effective collaboration of local government with local institutions, businesses, the third sector and other key stakeholders.

The complete set of actions to be taken by the council are set out in Table 4.1. Of these, the council will prioritise the following seven actions. Progress on these priority actions will be reported on separately each year through the council's Annual Status Report.

1. Develop an advanced air quality information service.
2. Pilot a construction emissions alert and response system, in which construction emission spikes from major developments trigger an enforcement response. Fully develop this system, subject to results of the pilot.
3. Work with local communities to reduce emissions in neighbourhood areas through the council's Low Traffic Neighbourhood programme as part of a wider strategy to reduce traffic across the borough.
4. Work towards integrating local air quality targets on NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, as set out in Lambeth's Air Quality Vision, into the next iteration of the Local Plan.
5. Review Lambeth's Responsible Procurement Policy with a view to introducing a mandatory electric vehicle component for all contracts over £100k in which

transport is a major element, stepping up to a 100% electric vehicle requirement over time.

6. Work with businesses, institutions and other stakeholders across the borough to develop a Clean Air Pledge, working together to drive down pollution.
7. Recruit for and launch an Air Quality Community Forum, comprising residents and local stakeholders, to help shape the council's approach to tackling air pollution, and hold the council to account for its progress towards its air quality targets.

## **2. Development and Implementation of Lambeth's AQAP**

### **2.1 Consultation and Stakeholder Engagement**

A full consultation will be undertaken on this draft Action Plan in the summer of 2022. The development of this draft has been informed by an online pre-consultation exercise to gather the views of Lambeth residents, and a series of online and in-person events.

Three online drop-in sessions with council officers were held, with invitations sent out to third sector, community and resident groups across Lambeth. A further online session for residents was held with the cabinet member, Cllr Adilypour, responding to suggestions, questions and comments. This session was promoted through the council's social media channels. Council officers sought the views of local businesses with a stall at the Green Business Fair, and engaged with residents at "environmental action days" on council estates.

The council hosted an online pre-consultation on the Commonplace platform. This was promoted through targeted social media on Facebook and Instagram, A3 and A4 posters sent to libraries, GPs, schools and other public buildings, and JCDs and BT Digital Screens. The council received 234 responses to the online pre-consultation.

84% of respondents had an overall negative sentiment regarding air quality in Lambeth, with cars and vehicles listed as the biggest pollution concern where people live. Respondents felt well informed about the steps they could take to reduce pollution (82%), though a majority of respondents (66%) said they did not have enough information about air quality where they live and work.

The council asked three key open questions as part of this exercise, and the responses are summarised below:

Question: What action would you like to see Lambeth Council take to improve air quality?

Responses:

- i. Communication

There was strong consensus that residents need to be consulted and listened to more, with representative responses including “talk to resident to come up with a solution that benefits everyone not just a few”, “taking residents views and concerns into accounts before they implement changes especially those that have negative views they don’t get heard just get ignored”

#### ii. Monitoring.

There was strong support for expanding air quality monitoring capacity, and doing more to communicate air quality information, with representative comments including “Start monitoring air quality”, “No monitoring of PM is South Norwood”, “PM2.5 and NOx monitors with readings and WHO guidelines on bus stops with the data on a display”.

#### iii. Transport

Transport was the most commented on theme. There were calls to re-imagine public spaces, with concern that Lambeth is very car centric at the moment. “Do more to discourage driving - a lot of Lambeth feels like it was built for cars, rather than people. Public transport is available for those able to use it and so the vast majority of car journeys in the area are unnecessary. Could we do more to change the image of driving, so that people see the harm they are causing?”

There were calls for more electric buses, more electric charging points, better cycling on street, storage and “better cycle lanes... and space for cyclists”. A few responses noted support for the expansion of school street, and for more work to tackle idling vehicles.

Low Traffic Neighbourhoods are a contentious issue for residents, with many responses supporting and opposing their introduction.

Those who opposed the LTNs were concerned about

- Increased traffic on already polluted roads
- Equalities impacts of more polluted boundary roads, with one representative comment “Boundary Road traffic needs to be addressed, there are people living, working and kids going to school on those roads and the council pushes more and more traffic there by introducing unfair and discriminatory LTNs. Lambeth needs to remove those LTNs as they do not work and create more traffic and more pollution across the entire borough and think about other ways of reducing traffic that is fair for everyone” and “Stop forcing more traffic onto the A205 and think about the residents who live on this road. All your efforts seem directed to help other residents to our detriment. (Also speed limits on the A205 should be enforced.)”

However, many respondents were keen to see LTNs implemented borough wide, with one representative comment “More LTNs. Every road that isn't an A-road should be an LTN. It's not okay to have so many cars congesting our streets.” and “Faster roll out of LTNs”.

All responses that touched on Ultra Low Emission Zone (ULEZ) were supporting of the council lobbying for the expansion of ULEZ London wide – “Strong support for ULEZ - campaign to get the whole of Lambeth Covered”.

#### iv. Green space

That was broad support for Increasing the number of trees in the borough and expanding green spaces, with representative comments like “Plant more trees and bushes”, “Continue to promote green, more street trees to be planted”, “Developing green spaces around roads, junctions”, “Ensure no mature trees are felled to facilitate new development”.

#### v. Wood burning

There were multiple calls to reduce wood burning, with representative responses “Ban wood burning stoves, Ban patio heaters”, “ban garden fires, and pub barbeques smoke spreading all over the streets”

Question: What action would you like to see others take to improve local air quality?  
e.g. central Government, businesses

Responses:

Respondents mentioned a wide array of actions, which are listed below. A common theme was a sense of frustration that authorities (central government and local) are not responsive to the views and needs of people.

There were multiple responses that more needs to be done on the affordability of electric cars (e.g. grants), and that more needed to be done to support shared/community ownership of electric cars to give access to people that cannot afford a private vehicle.

There were calls to lobby TfL/central government to improve bus services and generally make public transport more accessible and affordable. There were multiple responses that the cost of public transport made it inaccessible to some. One responded called for the nationalisation of the national rail network to improve investment and make rail travel more affordable.

There were calls for local businesses to do more to adopt active travel targets for their staff commuting into work, and for local retailers to do more to reduce freight mileage for their inward and outward deliveries.

Other themes included:

- Lobby airports and Central government for less flight paths over London
- Lobby central government for lower speed limits
- Lobby central government for more grants for boiler replacements
- Lobby central government/TfL to introduce road user charges

- More coordination on transport programme between neighbouring councils
- Support for ULEZ expansion

Question: What can the council do to support you and/or local businesses to take action on air pollution?

A common theme in responses were that people were keen to make healthier/less polluting choices in the way they move around Lambeth, but that much more support was needed to make those choices viable. Representative responses on this theme were: “Better coverage for EV charging stations. Lambeth is behind compared to other boroughs”, “more cycle parking at schools”, “more cycle training for residents”, “improved bus services”, “make it easier to obtain planning permission for bike sheds”.

As with responses to other questions, there were conflicting views on LTNs, with some residents feeling they made it easier to travel by foot and bike, and others feeling they made main roads less suitable for cycling and walking.

There were calls for better and more consistent communication from the council to inform residents about healthier/less polluting choices they could make in their everyday lives. One respondent felt that a lot more should be done to highlight the issue of indoor air pollution.

A number of responses called for more proactive engagement with local businesses. One respondent suggested the council could provide a “green” accreditation for local businesses, so that residents could make informed choices about where to shop. One respondent noted that the council could do more to require local businesses to protect workers that are exposed to higher levels of indoor and outdoor air pollution.

### Demographic data

Respondents were evenly split by gender. Most respondents fell into the age range 34-64, with lower representation of young and elderly residents. The ethnicity of respondents was overwhelmingly white, at 94%, compared to a population estimate of 66%. Despite black residents making up 23% of Lambeth’s population, according to 2016 ONS figures, there were no responses from respondents who identified as black. Asian respondents represented 1% of responses, compared to a population estimate of 3%.

The council therefore acknowledges that on age and ethnicity, the respondents to the online pre-consultation are not representative of the borough’s population, and that more targeted outreach will be required during the formal consultation phase to ensure a representative sample of residents views is collected.

### **3 Action Plan Table**

Table 4.1 shows the Lambeth AQAP. It contains:

- a list of the actions that form part of the plan;

- the responsible individual and departments/organisations who will deliver this action;
- estimated cost to the council;
- expected benefit in terms of emissions and concentration reduction;
- the timescale for implementation, the outputs, targets and Key Performance Indicators;
- how progress will be monitored.

The actions have been grouped into the following categories:

1. Reducing pollution from transport
  - 1.1. Council fleet and commissioned transport services
  - 1.2. Transport planning, policy and infrastructure
2. Reducing pollution from construction
  - 2.1. Planning policy and guidance
  - 2.2. Enforcement and public protection
3. Reducing indoor and outdoor air pollution from energy use in buildings
  - 3.1. Council-owned residential and non-residential buildings
  - 3.2. Policy, support and communication
4. Reducing pollution from other sources
5. Reducing exposure to pollution
6. Monitoring and modelling air quality
7. Public information, awareness raising
8. Collaboration and stakeholder engagement

**Table 4.1 Air Quality Action Plan**

- 1. Reducing pollution from transport
- 1.1 Council fleet and commissioned transport services

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions / concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Council fleet and commissioned transport services	1.1.1	The vast majority of the council's fleet to be electric or zero emission by 2030. Target the introduction of electric cars and vans under 3.5 tonnes between 2023-25. Report annually on the percentage of the council's vehicles that are fully	Fleet Management & Operational Transport Services	££££	2	Throughout AQAP period	Annual reporting of council fleet composition in Carbon Emissions Report	In April 2021, the council owned or leased 147 fossil fuel vehicles, 33 electric vehicles, and 5 hybrid vehicles.



		electric/zero emission.						
Council fleet and commissioned transport services	1.1.2	Audit the council's fleet, with service areas committing to using public transport, cargo bikes, and other active travel options where feasible. Commit to sizing the council's fleet in line with this objective, and in a way that is consistent with the Climate Action Plan requirement for	Fleet Management & Operational Transport Services  Service areas that use council fleet, including Parks department	£	1	2023	Audit of council's fleet in each relevant service area	In April 2021, the council owned or leased 147 fossil fuel vehicles, 33 electric vehicles, and 5 hybrid vehicles.

		a 27% reduction in traffic by 2030.						
Council fleet and commissioned transport services	1.1.3	All new procurement of vehicles will undergo options appraisals to review the feasibility of all fuel types, as set out in the forthcoming Fleet Management Strategy.	Fleet Management & Operational Transport Services  Service areas that use council fleet, including Parks department	£	1	2024	Adoption of new rules in the forthcoming Fleet Management Strategy	

Council fleet and commissioned transport services		All small vehicles supporting waste services (e.g. vans) to be fully electric.	Waste	£	1	With immediate effect	Percentage of small vehicles that are fully electric	From October 2021, under the new waste contract, all small vehicles supporting the services will be electric
Council fleet and commissioned transport services	1.1.4	Expand electrification of Lambeth's Refuse Collection Vehicles.	Waste	£££	1	2023-25	Number of electric Refuse Collection Vehicles	The first electric Refuse Collection Vehicle (e-RCV) joined the service in March 2021 after a trial in February 2020, with a second due early in the new waste contract. The second e-RCV will be a repurposed/repowered vehicle. This means we will be taking an old RCV nearing the end of its life and replacing the diesel engine with an electric motor.

Council fleet and commissioned transport services	1.1.5	Expand electrification of Lambeth's street cleansing fleet, and aim to reduce pollution from resuspended particulate matter pollution.	Waste	£££	1	2023-25	Percentage of street cleansing fleet that is fully electric Implementation of study recommendations on resuspension from street cleansing	Lambeth's street cleansing fleet already includes five electric small mechanical brooms (e-SMBs) and one dust cart. Lambeth is currently working with Southwark and Imperial College to investigate the impacts of different street cleansing equipment and methodologies on resuspension of PM pollution.
Council fleet and commissioned transport services	1.1.6	Review Lambeth's Responsible Procurement Policy with a view to introducing a mandatory electric vehicle component for all contracts over £100k in which transport is a major element, stepping up to a 100% electric vehicle requirement over time.	Procurement  Climate Change and Sustainability  Commissioning service areas	£££	3	2023	Adoption of new rules in 2023 revision of Responsible Procurement Policy	Lambeth council spends over £500m each year on procurement of goods and services. Emissions from procured transport services are significantly larger than direct emissions from the council's fleet.

Council fleet and commissioned transport services	1.1.7	All new contracts with a transport element exceeding £100k to give preferential scoring to bidders that integrate cargo bike or other active travel delivery modes, where applicable.	Procurement  Climate Change and Sustainability  Commissioning service areas	£	2	2023	Adoption of new rules in 2023 revision of Responsible Procurement Policy	
Council fleet and commissioned transport services	1.1.8	All vehicles on new contracts with a transport element exceeding £100k to meet the ULEZ emissions standard.	Procurement  Climate Change and Sustainability  Commissioning service areas	£	2	2023	Adoption of new rules in 2023 revision of Responsible Procurement Policy	
Council fleet and commissioned transport services	1.1.9	All new contracts for a fleet service exceeding £100k to pursue fleet optimisation and vehicle route planning to	Procurement  Climate Change and Sustainability  Commissioning service areas	£	2	2023	Adoption of new rules in 2023 revision of Responsible Procurement Policy	

		minimise mileage.						
Council fleet and commissioned transport services	1.1.10	All new contracts with a transport element exceeding £100k to commit to an anti-idling policy, and for all drivers to have undertaken anti-idling training.	Procurement  Climate Change and Sustainability  Commissioning service areas	£	2	2023	Adoption of new rules in 2023 revision of Responsible Procurement Policy	
Council fleet and commissioned transport services	1.1.11	All new contractors delivering a freight service exceeding £100k to pursue freight consolidation, using freight consolidation hubs where feasible.	Procurement  Climate Change and Sustainability  Commissioning service areas	£	2	2023	Adoption of new rules in 2023 revision of Responsible Procurement Policy	
Council fleet and commissioned transport services	1.1.12	Smarter Driver Training for Lambeth fleet drivers to increase fuel efficient driving.	Parks and other teams with owned/leased vehicles	££	1	2023-25	Percentage of Lambeth drivers to have undertaken smarter driver training	

## 1.2 Transport planning, policy and infrastructure

Transport planning, policy and infrastructure	1.2.1	Work with local communities to reduce emissions in neighbourhood areas through the council's Low Traffic Neighbourhood programme as part of a wider strategy to reduce traffic across the borough.	Transport  Climate Change and Sustainability	££££	3	2023-25	Measured and modelled air quality impacts of LTNs Number of LTNs and coverage of LTNs	
Transport planning, policy and infrastructure	1.2.2	Progress towards a target of 25 percent of kerbside space allocated for community resilience to climate change, re-purposing street space to promote active travel and zero emission vehicles, improving local air quality.	Transport	££££	1	2023-25	Percentage of kerbside space allocated for community resilience to climate change	

Transport planning, policy and infrastructure	1.2.3	Deliver Healthy Routes to enable a shift towards active travel and improve air quality.	Transport	£££	3	2023-25	Number of healthy routes and length of network	
Transport planning, policy and infrastructure	1.2.4	Investigate potential role of zero emission zones in Lambeth.	Transport	£	1	2023	Feasibility work on zero emission zones	
Transport planning, policy and infrastructure	1.2.5	Reduce pollution in the close vicinity of schools by implementing School Streets that remove the majority of vehicles on streets with school accesses.	Transport	££	3	2023-25	Measured and modelled air quality impacts of school streets Number of school streets	A GLA study has shown that School Streets can reduce nitrogen dioxide by up to 23 per cent during morning drop off.
Transport planning, policy and infrastructure	1.2.6	Deliver a school superzone project to improve the air quality, targeting areas with high levels of deprivation and need. Lessons	Public Health	££	2	2023-25	Delivery of project	



		to be rolled out across the borough, subject to funding.						
Transport planning, policy and infrastructure	1.2.7	Continue to support the school daily mile programme, including the identification and promotion of clean walking routes to schools, children and parents/carers.	Public Health	££	1	2023-25	Promotional materials produced and activities undertaken	
Transport planning, policy and infrastructure	1.2.8	Increase promotion of cycling and walking websites and apps.	Transport	££	1	2023-25	Promotional materials produced and distributed	
Transport planning, policy and infrastructure	1.2.9	Continue to actively engage with all schools in the STARS programme.	Transport	££	1	2023-25	Activities undertaken	36 schools are currently taking part in STARS in Lambeth, Lambeth is currently expanding resources within the team to provide more officer time to this workstream
Transport planning, policy	1.2.10	Continue to support schools to implement	Transport	££	1	2023-25	Number of travel plans moved from bronze to	There are currently 7 schools with bronze travel plans, 9 with silver and 20 with gold

and infrastructure		travel plans moving from bronze to silver to gold.					silver and silver to gold	
Transport planning, policy and infrastructure	1.2.11	Work to reduce pollution in the close vicinity of hospitals and support the Clean Air Hospital Framework update.	Transport Climate Change and Sustainability	££	1	2023-25	Delivery of updated Clean Air Hospital Framework	
Transport planning, policy and infrastructure	1.2.12	Continue E-cargo bike trials to enable a shift away from polluting vehicles for smaller freight trips.	Transport	££	1	2023-25	Completion of trials	
Transport planning, policy and infrastructure	1.2.13	Commission research on the effect of 15-minute neighbourhoods on vehicle mileage reduction and air quality. Research to inform next iteration of the Local Plan	Transport	£	1	2023	Research delivered	

Transport planning, policy and infrastructure	1.2.14	Expansion of cycle hire schemes across the borough through allocation of S106 funds to deliver expansion of the TfL Cycle Hire Scheme, and expansion of dockless cycle hire schemes.	Transport	£££	2	2023-25	Number of cycle hire schemes in the borough	
Transport planning, policy and infrastructure	1.2.15	Reduce instances of idling vehicles through increased communications and enforcement of anti-idling measures.	Public protection  Climate Change and Sustainability	££	2	2023-25	Promotional materials produced and activities undertaken	
Transport planning, policy and infrastructure	1.2.16	Support the consolidation of freight across the borough.	Transport	£££	2	2023-25	Volume of freight across the borough	Lambeth is currently exploring ways of resourcing this workstream to deliver on a range of projects and develop its strategy. Lambeth aims to develop a strategy which will help us meet our Zero Freight emissions by 2030 target as set out in the climate action plan. Projects will include working with businesses to

								encourage shared electric Vans, identifying opportunities for innovation in logistics and delivery, and producing a strategy and delivery plan.
Transport planning, policy and infrastructure	1.2.17	Air quality to be a key consideration when updating and delivering a revised Electric Vehicle and Car Club Strategy that supports the uptake of electric vehicles, including e-scooters and e-bikes, car clubs and privately owned vehicles for essential trips.	Transport	£	1	2023-25		
Transport planning, policy and infrastructure	1.2.18	Installation of more residential charge points in lamp columns, and take measures to ensure electric vehicle bays are free for charging.	Transport	££££	3	2023-25	Number of charge points in lamp columns installed	Lambeth aims to install 116 residential charge points in 22/23, and continue to grow its number of available fast and rapid network spaces.

Transport planning, policy and infrastructure	1.2.19	Installation of rapid chargers to enable the take up of electric taxis, cabs and commercial vehicles, in partnership with TfL and/or OLEV.	Transport	££££	3	2023-25	Number of rapid chargers installed	Lambeth is currently working with TfL to identify locations for a Rapid Hub. Lambeth is also working through a procurement and site identification process to install 8 Rapid chargers with the aim to carry out installation in quarter one of 2023/24.
Transport planning, policy and infrastructure	1.2.20	Review feasibility of rapid charging hubs to complement slow and fast charging infrastructure, in partnership with TfL.	Transport	£	1	2023	Review undertaken	
Transport planning, policy and infrastructure	1.2.21	Develop and implement an updated electric vehicle strategy that enables car clubs to transition towards full BEV fleets by 2025.	Transport	££	1	2023-25	Updated electric vehicle strategy delivered	
Transport planning, policy and	1.2.22	Installation of electric vehicle car club bays throughout the borough.	Transport	£££	2	2023-25	Number of electric vehicle car club bays installed	

infrastructure								
Transport planning, policy and infrastructure	1.2.23	Review role of public charging infrastructure to support e-bikes, e-cargo bikes and shared micro mobility.	Transport	££	1	2023	Review undertaken	
Transport planning, policy and infrastructure	1.2.24	Take steps to encourage and facilitate increased cycling among more vulnerable road users and groups with lower cycling rates.	Transport	££	1	2023-25	Activities undertaken	
Transport planning, policy and infrastructure	1.2.25	Deliver car free days that raise awareness around the impacts of poor air quality and support the shift towards less polluting modes.	Transport	£	1	2023-25	Car free days delivered	Lambeth currently has one car free day per year
Transport planning, policy and	1.2.26	Lobby for low-emission buses to serve all routes in Lambeth.	Council-wide	£	3	2023-25	Activities undertaken	

infrastructure								
Transport planning, policy and infrastructure	1.2.27	Support the continued expansion of the Ultra Low Emission Zone to the whole of Lambeth and lobby for a smarter charge linked to vehicle mileage in the long-term.	Council-wide	£	3	2023-25	Activities undertaken	
Transport planning, policy and infrastructure	1.2.28	Extend parking controls to reduce air pollution through increased coverage of Controlled Parking Zones and modification of existing zones, while advancing the primary objectives of The Road Traffic Regulation Act 1984	Climate Change and Sustainability Transport Parking	£	2	2023	Coverage of Controlled Parking Zones increased	
Transport planning, policy	1.2.29	Create walking routes through neighbourhoods	Transport	££	1	2023-25	Number of walking routes created	

and infrastructure		to promote greater uptake of active travel						
Transport planning, policy and infrastructure	1.2.30	Apply London Plan and Local Plan transport policies to encourage a reduction in car ownership and private car trips and greater use of communal and active travel modes.	Planning	£	2	With immediate effect	Policies applied in new planning applications	<p>In all developments at least one charge point should be provided to allow for re-charging of electric cycles and a charge point should be provided for a minimum of 1 in 10 cycle parking spaces. Charge points should be accessible to all cycle stand types, particularly those intended to accommodate larger/cargo cycles which may be more likely to require electric assistance.</p> <p>Communal bike stores should provide charging facilities for e-bikes.</p> <p>When considering parking impacts, the council will prioritise alternative kerbside uses supported in the Transport Strategy, such as car club cars, cycle parking and electric vehicle charge points, ahead of parking for private motor vehicles.</p> <p>Zero emissions vehicles should be used for servicing</p>



								wherever possible and consolidated deliveries are expected to be of this type. Servicing by cycle and other non-motor vehicular modes should be used wherever possible. Any on-street loading bay required for a development should be supplied with an electric vehicle rapid charge point to allow zero emissions vehicles to operate from the bay.
Transport planning, policy and infrastructure	1.2.31	Install anti-idling signage around garages and parking areas on housing estates.	Housing	£	1	2023	Signage installed	
Transport planning, policy and infrastructure	1.2.32	Continue to limit the provision of parking spaces on residential estates in locations that expose residents to exhaust fumes.	Housing	£	2	With immediate effect	Activity undertaken	
Transport planning, policy and	1.2.33	Invest £500,000 over three years to Increase the provision of cycling storage	Housing	£££	2	2023-25	Volume of cycle storage installed, and number of cycle routes developed	

infrastructure		on the council's residential estates. Develop cycle routes through estates, and cycle friendly access and exit points on estates.						
Transport planning, policy and infrastructure	1.2.34	Install over 5000 secure cycle storage spaces by 2026	Transport	££££	2	2023-25	Number of secure cycle storage spaces installed	
	1.2.35	Increase provision of electric vehicle charging infrastructure on the council's residential estates, with a target to install units on all estates over 100 properties.	Housing	£££	2	2023-25	Number of electric vehicle charging points installed on estates and volume of bicycle storage in parks and green spaces installed	
Transport planning, policy and infrastructure	1.2.36	Increase provision of bicycle storage in Lambeth's parks and green spaces to	Parks	£££	2	2023-25		

		encourage active travel.						
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2. Reducing pollution from construction

2.1 Planning policy and guidance

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(£££)	Expected emissions / concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Planning policy and guidance	2.1.1	Planning decisionmakers will be advised about local air quality targets on PM2.5, PM10 and NO2, as set out in Lambeth's Air Quality Vision, as a material consideration alongside development plan policy.	Planning	£	2	With immediate effect	Activities undertaken	

Planning policy and guidance	2.1.2	The council will work towards integrating local air quality targets on NO2, PM10 and PM2.5, as set out in Lambeth's Air Quality Vision, into the next iteration of the Local Plan.	Planning  Climate Change and Sustainability	£	3	Work to start once the next Local Plan review commences (date tbc)	Adoption of new rules in the next Local Plan	
Planning policy and guidance	2.1.3	Produce an updated air quality guidance note pulling together references to all existing policy and guidance on construction and air quality as contained in the Local Plan, London Plan, SoWN neighbourhood plan and Supplementary Planning Guidance as an aid and checklist for applicants	Planning  Climate Change and Sustainability	£	2	2023	Guidance note delivered	

		and decision makers.						
Planning policy and guidance	2.1.4	Produce a construction code of practice for small developments to be used as an informative on planning consents, informed by emerging examples of best practice.	Climate Change and Sustainability	£	1	2023	Code of practice delivered	
Planning policy and guidance		Reduce/mitigate pollution from construction logistics through application of current development plan policy.	Planning	£	2	With immediate effect	Activities undertaken	See Local Plan policy T7.  Planning applications for major development, and other development where construction related activities may lead to a significant impact on the surrounding public highway, should include a construction logistics plan or a construction management plan that is appropriate to the scale of the development demonstrating arrangements for construction traffic and how environmental, traffic and amenity impacts will be minimised.

								<p>Developers and their contractors will be expected to adhere to the Construction Logistics and Community Safety (CLOCS) standard and be registered through the Fleet Operator Recognition Scheme (FORS) or equivalent. They will be required to demonstrate in a construction logistics plan that they have considered the impacts of other construction activities in the vicinity of the site and where appropriate have coordinated construction activities with the developers and/or contractors of adjoining sites.</p> <p>New development should make use of existing consolidation and distribution facilities in order to minimise the number of trips required to service the site.</p> <p>Development proposals close to the Thames should maximise use of water transport by considering using the river for the transportation of construction materials and waste as part</p>
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								of the construction management plan.
Planning policy and guidance	2.1.5	Aim to reduce diesel generators on construction sites wherever possible.	Planning	£	2	With immediate effect	Activities undertaken	See The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance, July 2014  Wherever possible, renewable, mains or battery powered plant items should be used.
Planning policy and guidance	2.1.6	Pursue Air Quality Positive development in Opportunity Areas, through application of development plan policy and guidance.	Planning	£	3	With immediate effect	Air Quality Positive developments delivered	Lambeth will apply London Plan policy SI1 Improving air quality to all development proposals in the borough, and associated Mayoral guidance including the Mayor's emerging Air Quality Positive London Plan Guidance.  Opportunity Areas (Nine Elms Vauxhall and Waterloo) should adopt an air quality positive approach that actively reduces air pollution in accordance with London Plan policy SI1.  In the (Waterloo) Opportunity Area the council will apply the air quality positive approach in accordance with London Plan policy SI1.

Planning policy and guidance	2.1.7	Consider the cumulative impact of construction of nearby developments in order to identify, and where possible mitigate, any cumulative effects on local air quality.	Planning	£	2	With immediate effect	Activities undertaken	See The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance, July 2014  The potential cumulative effects of emissions from several development sites should be considered and managed between the sites. For high risk sites, liaison meetings should be held with site managers of other high risk construction sites within 200 m of the site boundary to ensure plans are co-ordinated and dust and particulate matter emissions are minimised.
Planning policy and guidance	2.1.8	Reduce and mitigate pollution from construction and demolition through application of London Plan and Local Plan policy and the London Plan Sustainable Design and	Planning	£	2	With immediate effect	Activities undertaken	



		Construction Supplementary Planning Guidance and The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance.						
Planning policy and guidance	2.1.9	As stated in Local Plan policy T1, the council will apply London Plan policy T2, Healthy Streets, in accordance with the Lambeth Healthy Routes Plan and Low Traffic Neighbourhood Plan, to facilitate trips by walking and cycling in order to reduce health inequalities. Public realm	Planning	£	2	With immediate effect	Activities undertaken	

		improvements should accord with TfL's Healthy Streets Approach.						
Planning policy and guidance	2.1.10	Organise training for planning officers on air quality and the implementation of air quality policy.	Climate Change and Sustainability	£	1	2023	Training delivered	
Planning policy and guidance	2.1.11	Require developers to certify, post-approval, that air quality relevant design decisions, mitigation measures and other conditions have been implemented in accordance with the agreed strategy.	Planning	££	2	2023	Certification that air quality relevant design decisions, mitigation measures and other conditions have been implemented received	
Planning policy and guidance	2.1.12	Develop a standard condition to be used in permissions for	Planning	£	2	2023	Standard condition securing of real time air quality data to the	

		major developments, to secure monitoring and reporting of real time air quality data to the council during construction phase. Data will be recorded on the council's construction emissions alert and response system, and be made publicly available and accessible.					council applied to major developments. Data made available to the public.	
Planning policy and guidance	2.1.13	Consider potential to use developer contributions for a construction emissions alert and response system.	Planning Climate Change and Sustainability Public Protection	£££	1	2024	Activities undertaken	

## 2.2 Planning enforcement and public protection

Planning enforcement and public protection	2.2.1	Pilot a construction emissions alert and response system, in which construction emission spikes from major developments trigger an enforcement response. Fully develop this system, subject to results of the pilot.	Public Protection  Climate Change and Sustainability	£££	3	2023	Pilot scheme delivered	
Planning enforcement and public protection	2.2.2	Apply and enforce NRMM policies for all relevant applications. Maintain participation in pan-London NRMM enforcement scheme and assist implementation as required, subject to	Public protection  Planning	££	2	With immediate effect	Activities undertaken	

		continuation of the scheme.						
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### 3. Reducing indoor and outdoor air pollution from energy use in buildings

#### 3.1 Council-owned residential and non-residential buildings

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions / concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Council-owned residential and non-residential buildings	3.1.1	Make full use of grant funding available through the Green Homes Grant, Social Housing Decarbonisation Fund, Home Upgrade Grant, and other central government and GLA funding programmes, alongside council	Housing  Climate Change and Sustainability	££££	3	With immediate effect	Number of council homes retrofitted, energy efficiency measures installed and gas boilers replaced with low carbon heating	

		resources, to retrofit Lambeth's council homes, reducing gas boiler use through energy efficiency measures, and where possible removing existing gas boilers and installing low carbon, clean heating.						
Council-owned residential and non-residential buildings	3.1.2	Work with residents to demonstrate the indoor air quality benefits of replacing gas with electric cooking. Undertake a programme to replace gas cooking with electric cooking in properties where there is resident support, and subject to	Housing	££££	3	2023-25	Promotional materials produced and activities undertaken	

		affordability of fuel bill impacts.						
Council-owned residential and non-residential buildings	3.1.3	Commit to review feasibility of installing low carbon, clean heating technologies like air and ground source heat pumps in council estates/blocks/houses, each time existing gas boilers need to be replaced. Commit to installing low carbon, clean heating technologies where technically feasible, within available budgets, and with affordable fuel bill impacts.	Housing  Climate Change and Sustainability	££££	3	With immediate effect	Review undertaken	
Council-owned residential and non-residential	3.1.4	Eliminate solid fuel heating in all council properties.	Housing	££	2	2025	All solid fuel heating ceased	

I buildings								
Council-owned residential and non-residential buildings	3.1.5	Make full use of grant funding available through the Public Sector Decarbonisation Scheme and other central government and GLA funding programmes, alongside council resources, to retrofit Lambeth's council's non-residential buildings, reducing gas boiler use through energy efficiency measures, and where possible removing existing gas boilers and installing low carbon, clean heating.	Finance and Property Facilities Management Capital Studio Climate Change and Sustainability					



### 3.2 Policy, support and communication

Policy, support and communication	3.2.1	Maximise onsite renewable energy generation and low carbon production for all major developments in accordance with London Plan policy and guidance.	Planning	£	3	With immediate effect	Activities undertaken	<p>See London Plan 9.2.3 and 9.3.8</p> <p>Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal). 9.3.8 Increasing the amount of renewable and secondary energy is supported and development proposals should identify opportunities to maximise both secondary heat sources and renewable energy production on-site. This includes the use of solar photovoltaics, heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites</p> <p>See Energy Assessment Guidance April 2020 Draft</p> <p>The GLA expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has</p>
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								already been reached through earlier stages of the energy hierarchy. In particular, solar PV should be maximised on roof spaces.
Policy, support and communication	3.2.2	Develop a Local Area Energy Planning process for whole energy system decarbonisation, including upgrading key utilities and electricity infrastructure to enable our energy to come from 100% renewable and zero carbon sources.	Climate Change and Sustainability	££	2	2023-25	Local Area Energy Planning process developed	Lambeth council has commissioned a heat decarbonisation to identify the measures that can be taken across a wide range of buildings to decarbonise heating, and the costs and benefits of these measures. This study has reviewed all feasible options across all building types in Lambeth, from improved energy efficiency and insulation, to renewable and low carbon technologies like heat pumps. The study reviews the viability of heat networks compared to individual building-level solutions. Findings are available here: <a href="https://beta.lambeth.gov.uk/environmental-services/climate-change-impact-plans/heat-decarbonisation-study">https://beta.lambeth.gov.uk/environmental-services/climate-change-impact-plans/heat-decarbonisation-study</a>
Policy, support and	3.2.3	Apply London Plan Air Quality Positive Guidance on	Planning	£	2	Subject to adoption of Air Quality	Activities undertaken	

communi cation		reducing emissions from combustion plant.				Positive Guidance		
Policy, support and communi cation	3.2.4	Wherever possible, seek to curb the use of biomass in accordance with The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance, The London Plan, and emerging Air Quality Positive/Air Quality Neutral London Plan Guidance.	Planning	£	2	With immediate effect	Activities undertaken	
Policy, support and communi cation	3.2.5	Improve indoor air quality in the private rented sector by tackling damp and mould. This will include:	Private Sector Housing and Enforcement	££	2	2023	Promotional materials produced and activities undertaken	

		<ul style="list-style-type: none"> <li>• Promoting simplified guidance for tenants on their rights, and the process for the council to take enforcement action against landlords that refuse to make necessary repairs to tackle damp and mould</li> <li>• Undertaking a communications campaign to ensure Lambeth residents are aware of their rights, and steps they can take if they are living with damp and mould</li> <li>• Promoting new guidance for tenants and landlords on preventing the</li> </ul>						
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		<p>formation of damp and mould</p> <ul style="list-style-type: none"> <li>• Making template letters available to support tenants to initiate the process</li> <li>• Updating the council webpages with the latest information and guidance</li> </ul>						
Policy, support and communication	3.2.6	Launch a communications campaign to dissuade Lambeth residents from burning wood in their homes.	Climate Change and Sustainability	££	3	2023	Communications campaign delivered	
Policy, support and communication	3.2.7	Enforcement officers to undertake training on restrictions on the sale of coal, wet wood and manufactured solid fuels that can be burned in the home.	Public Protection	£	2	With immediate effect	Training delivered	

Policy, support and communication	3.2.8	Promote uptake of central government and GLA grant funding to individual households, social and private landlords, to reduce gas boiler use through energy efficiency measures, and where possible remove existing gas boilers and install low carbon, clean heating.	Climate Change and Sustainability	££	3	2023-25	Promotional materials produced and activities undertaken	
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4. Reducing pollution from other sources

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions / concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Policy, support and communication	4.1	The Climate Change and Sustainability team to review Cabinet Member Delegated Decision Reports and Officer Delegated Decision Reports, and provide recommendations to ensure consistency of council decisions with air quality policy.	Climate Change and Sustainability		2	2023-25	Activities undertaken	

Policy, support and communication	4.2	Work to eliminate mould and damp due to structural issues in council properties.	Housing	££££	3	2023-25	Activities undertaken	
Policy, support and communication	4.3	Launch a communications campaign to inform residents about steps they can take to improve indoor air quality.	Housing Climate Change and Sustainability	££	2	2023	Communications campaign delivered	
Policy, support and communication	4.4	Provide air quality training to housing officers to enable more effective interventions and better communication with residents	Climate Change and Sustainability	£	1	2023	Training delivered	
Policy, support and communication	4.5	Use water-based paints for indoor refurbishments on council housing estates, and audit materials used for refurbishment	Housing	££	1	2023	Activities undertaken	



		for potential negative indoor air quality impacts, reducing exposure to formaldehyde and other toxins wherever possible.						
Policy, support and communication	4.6	Take action to limit air pollution from events, in particular large and major events, by strengthening the requirements in the council's Green Events Guide. This will include: Minimising deliveries through consolidation and use of local companies where possible -Reviewing the availability of electric vehicle charging points, for use by	Events Climate Change and Sustainability	£	2	2023	Activities undertaken	See the current version of Lambeth's Green Events Guide, available <a href="#">here</a>

		<p>organisers, suppliers and traders</p> <ul style="list-style-type: none"><li>-Encouraging attendees on all communications to travel to events through walking, cycling or public transport</li><li>-Review feasibility and introduce new requirements to maximise bike storage at large events</li><li>-Implementing on-site renewable power generation, or batteries charged with solar/renewable energy off-site, where feasible</li><li>-Using mains power where available rather than temporary power</li></ul>						
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		<ul style="list-style-type: none"> <li>-Where generators are unavoidable, expecting the use of hybrid generators</li> <li>-Ensuring that generators are not left idling when not being used</li> <li>-Prohibiting the burning of wood, and only permitting smokeless fuels and designs for stoves and bonfires</li> </ul>						
Policy, support and communication	4.7	Conduct an annual review of parks machinery, including ground care machinery, leaf blowers, and hedge cutters, and commit to introducing electric/zero emissions machinery where feasible	Parks	£££	2	2023-25	Annual reviews undertaken	

Policy, support and communication	4.8	Invest in power infrastructure upgrades in and around Lambeth's parks to reduce pollution from idling ice cream vans, diesel generators and other fossil fuel uses by food and drink outlets	Parks	£££	2	2023-25	Activities undertaken	
Policy, support and communication	4.9	Restrict access of ice cream vans with freezers powered by diesel and petrol engines, to streets next to schools, to reduce exposure of school children to pollution from idling engines, as part of the school superzone project	Public protection	£££	2	2024	Activities undertaken	
Policy, support and	4.10	Minimise the potential negative impact	Environment and Streetscene	£	1	2023-25	Activities undertaken	

communi cation		of tree planting on local air quality (e.g. the build-up of pollution within street canyons by reducing air-flow, or increased BVOC emissions) through appropriate species selection and location of new trees						
Policy, support and communi cation	4.11	Work towards the following borough-wide commitments set out in the Climate Action Plan: Increase the diversion rate away from landfill and incineration to at least 70% by 2030; reduce organics disposal to landfill and incinerators by 25% by 2030;	Environment and Streetscene	££££	2	2023-25	Diversion rate from landfill and incineration to at least 70% by 2030. Organics disposal to landfill and incinerators by 25% by 2030 3-stream segregated waste collection including food/recyclables/residual enabled by 2026	See Lambeth's Climate Action Plan, available <a href="#">here</a>

		enable 3-stream segregated waste collection including food/recyclables/residual by 2026						
Policy, support and communication	4.12	Reduce residual waste from 397 kg per household in 2017/18 to less than 375 kg by 2025. By 2025 achieve a 37% household recycling rate and 60% recycling rate of local authority collected commercial waste.	Environment and Streetscene	££££	2	2023-25	Residual waste to be less than 375 kg per household by 2025. By 2025 achieve a 37% household recycling rate and 60% recycling rate of local authority collected commercial waste.	See London Borough of Lambeth Municipal Waste Management Strategy 2011 – 2031 available <a href="#">here</a>
Policy, support and communication	4.13	Review current smoking cessation promotion materials to include links with- and highlight the importance of indoor air quality.	Public Health	£	1	2023	Review undertaken	

Policy, support and communication	4.14	Create an internal awareness raising campaign for council staff on air quality, aligned to the workplace health objectives.	Climate Change and Sustainability		1	2023	Promotional materials produced and activities undertaken	
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#### 5. Reducing exposure to pollution

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions / concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Reducing exposure to pollution	5.1	Identify council housing properties with poor ventilation as part of a stock condition survey, and implement a	Housing	££	2	2023-24	Programme implemented	

		programme to improve ventilation, prioritising mechanical ventilation for properties most exposed to pollution sources.						
Reducing exposure to pollution	5.2	Identify housing estates with the highest exposure to air pollution, and develop estate-based action plans, developed by residents working with the council.	Housing  Climate Change and Sustainability	£££	2	2023-25	Action plans delivered	
Reducing exposure to pollution	5.3	Invest in green screens and other physical barriers at Lambeth schools most exposed to roadside pollution	Climate Change and Sustainability	£££	2	2023-25	Green screens and barriers delivered	
Reducing exposure	5.4	Introduce green infrastructure on housing estates,	Housing	£££	2	2023-25	Green infrastructure on	



to pollution		including new trees and hedgerows, to reduce the exposure of residents on estates to pollution from busy roads					housing estates delivered	
Reducing exposure to pollution	5.5	Expand green infrastructure in parks where appropriate to limit the exposure of people using parks and green spaces to local pollution sources	Parks	£££	2	2023-25	Green infrastructure in parks delivered	
Reducing exposure to pollution	5.6	As part of Lambeth's Tree Planting Strategy, prioritise the achievement of local air quality benefits through appropriate species selection and location of new trees	Environment and Streetscene	£	1	2023-25	Activities undertaken	

Reducing exposure to pollution	5.7	Investigate the effectiveness of outdoor air filtration/purification systems in enclosed/semi-outdoor spaces	Climate Change and Sustainability	££	1	2024	Literature and evidence review  Development of pilot subject to evidence review and available resource	
Reducing exposure to pollution	5.8	Ensure adequate, appropriate, and well-located green space and green infrastructure is included in new developments, in accordance with Local Plan policy EN1 and London Plan policy G5 (Urban Greening Factor).	Planning	£	3	With immediate effect	Activities undertaken	
Reducing exposure to pollution	5.9	Protect, expand and improve green Infrastructure, including trees, across the borough in accordance with	Planning	£	3	With immediate effect	Activities undertaken	

		Local Plan policies EN1 and Q10.						
Reducing exposure to pollution	5.10	Promote the use of green infrastructure as a part of Air Quality Positive proposals, in accordance with emerging London Plan Air Quality Positive guidance.	Planning	£	3	With immediate effect	Activities undertaken	See London Plan Guidance Air Quality Positive Consultation draft November 2021  Well considered use of green infrastructure may also form part of Air Quality Positive proposals and should be considered in line with Using Green Infrastructure to Protect People from Air Pollution guidance.
Reducing exposure to pollution	5.11	Continue to support the use of empty and derelict space in the borough to promote and support food growing and tree planting. Expand this work, subject to funding.	Public Health	££	1	2023-25	Activities undertaken	

6. Monitoring and modelling air quality

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10-£50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions/concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Monitoring and modelling air quality	6.1	<ul style="list-style-type: none"> <li>Develop an advanced air quality information service. This will include:               <ul style="list-style-type: none"> <li>o A new monitoring network of lightweight air quality monitors across Lambeth, measuring NO2, PM2.5 and PM10 for at least 30 locations.</li> </ul> </li> </ul>	Climate Change and Sustainability	£££	21	2023-24	Air quality information service delivered	

		<p>Sensors will be located to prioritise sensitive receptors and areas with poorer air quality, while ensuring geographic spread across the borough.</p> <ul style="list-style-type: none"> <li>o Continued operation of the council's 3 air quality monitoring stations, and over 100 diffusion tubes.</li> <li>o The creation of an online interface, accessible through the council's website, for residents to access accurate, accessible and up-to-date air</li> </ul>						
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		<p>quality data and analysis. Promotion of this information so it is accessible to all.</p> <p>o The redevelopment of airText to provide air quality information and advice in a way that is accessible and useful to members of the public, including as a purpose-built app for smartphone use. This redeveloped service will be promoted to Lambeth residents for wide take up, with targeting of groups that are most</p>						
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		vulnerable to pollution. o Air quality modelling in or close to schools, care homes and other locations where those vulnerable to air pollution spend time, including modelling of potential impacts of mitigation measures. Modelling results will be published online.						
Monitoring and modelling air quality	6.2	Coordinate with and support the rollout of air quality monitors by partner organisations across Lambeth.	Climate Change and Sustainability	£	1	2023-25	Activities undertaken	

Monitoring and modelling air quality	6.3	Use air quality data to shape council decision making, and inform the allocation of resources to mitigate air pollution.	Climate Change and Sustainability	£	2	2023-25	Activities undertaken	
Monitoring and modelling air quality	6.4	Develop a set of indicators to measure the impact of council and partner interventions to tackle air pollution.	Public Health	£	1	2023	Indicators delivered	



7. Public information, awareness raising

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions / concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Public information, awareness raising	7.1	Improve the provision of useful, easy to understand air quality information to residents on council estates.	Housing	££	1	2023	Activities undertaken	
Public information, awareness raising	7.2	Monitor air quality in Lambeth's parks and green spaces, and communicate the health benefits of spending time in these spaces.	Parks  Climate Change and Sustainability	££	1	2023-25	Promotional materials produced and activities undertaken	

8. Collaboration and stakeholder engagement

Action category	Action ID	Action name and description	Responsibility	Cost to the council <£10K(£) £10- £50K (££) £50K - 500K (£££); >500k(££££)	Expected emissions/ concentrations benefit Magnitude of Low (1), Medium(2) and High (3)	Timescale for implementation	Outputs, Targets and KPIs	Further information
Collaboration and stakeholder engagement	8.1	Work with businesses, institutions and other stakeholders across the borough to develop a Clean Air Pledge, working together to drive down pollution.	Climate Change and Sustainability	£	3	2023	Clean Air Pledge delivered	
Collaboration and stakeholder engagement	8.2	Collaborate with partner institutions to deliver Lambeth's	Climate Change and Sustainability	£	3	2023-25	Activities undertaken	Lambeth's Climate Action Plan contains a number of targets on transport, freight consolidation, greening, energy and air quality,

		Climate Action Plan						achieving which will directly or indirectly improve air quality. The Climate Action Plan is available <a href="#">here</a> :
Collaboration and stakeholder engagement	8.3	Recruit for and launch an Air Quality Community Forum, comprising residents and local stakeholders, to help shape the council's approach to tackling air pollution, and hold the council to account for its progress towards its air quality targets.	Climate Change and Sustainability	£	1	2023	Air Quality Community Forum delivered	
Collaboration and stakeholder engagement	8.4	Support a thriving network of community groups that through greening and other measures, improve air quality and exposure to better air quality	Climate Change and Sustainability	£££	2	2023-25	Activities undertaken	

		for Lambeth residents.						
Collaboration and stakeholder engagement	8.5	Coordinate the Council's efforts with large institutions, community groups, local businesses and residents to promote active travel, reduce road freight and electrify road transport.	Climate Change and Sustainability	£	1	2023-25	Activities undertaken	
Collaboration and stakeholder engagement	8.6	Strengthen engagement with Lambeth's Clinical Commissioning Group/ICS and GP surgeries on air quality issues, to better target residents with respiratory and cardiovascular conditions.	Public Health	£	1	2023-25	Activities undertaken	
Collaboration and stakeholder engagement	8.7	Create a 'train the trainer' programme on air quality with GP surgeries in	Public Health	££	1	2023-25	Train the trainer programme delivered	

		the borough using a whole practise approach to help create better awareness with residents on health impacts of air quality and what to do to help limit the effects of air quality on health.						
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**Appendix A      Response to Consultation**

To be completed following the formal consultation process

**Table A.1 Summary of Responses to Consultation and Stakeholder Engagement on the AQAP**

<b>Consultee</b>	<b>Category</b>	<b>Response</b>

**Appendix B      Reasons for Not Pursuing Action Plan Measures**

To be completed following the formal consultation process

**Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision – to be discussed with the GLA prior to finalisation**

<b>Action category</b>	<b>Action description</b>	<b>Reason action is not being pursued (including Stakeholder views)</b>