

DRAFT London Local Air Quality Management Framework Summary of Proposals and Consultation Questions

15th July 2015

1. Introduction

Local Air Quality Management is the statutory process by which boroughs monitor, assess and take action to improve local air quality. The Greater London Authority is consulting on proposals to establish a new statutory system for Local Air Quality Management in London, known as London Local Air Quality Management (LLAQM), to be operated by London's 33 boroughs (including the City Corporation). Having our own scheme for London is a call to action; it is a scheme designed to help us all work even more closely together to help address this crucially important issue.

There will be a ten week consultation from 15 July to 25 September 2015 on these proposals. Responses should be provided via the online questionnaire at

<http://www.surveymoz.co.uk/s3/2162651/London-Local-Air-Quality-Management-LLAQM>

We are aware that London boroughs have different structures, air quality issues and levels of resourcing so this consultation is an important opportunity to feed in to these draft proposals to ensure that this new system is as useful and appropriate as possible.

The new LLAQM system is designed to:

- Put in place a statutory LAQM system which reflects London's unique challenges and builds on boroughs' strengths
- Ensure that borough air quality staffing and resources are protected and, where possible, enhanced by ensuring that all borough responsibilities are clearly understood
- Provide a renewed focus on action rather than reporting for reporting's sake
- Ensure borough action complements London-wide efforts on transport, schools, planning, public health etc, while retaining borough freedom to respond to local priorities.
- Help ensure a co-ordinated, effective and consistent approach across London to maximise reductions in air pollution.

This consultation covers the following areas:

- a) Removal of reporting requirements for four pollutants where limit values have been consistently met
- b) Role of local authorities in working towards reductions in PM_{2.5}
- c) Streamlining of reports
- d) Air Quality Management Areas
- e) Considering and reporting on air quality focus areas
- f) Action Planning
- g) Planning and development control
- h) Accountability and Responsibility
- i) Monitoring
- j) Cleaner Air Borough Status

It is anticipated that LLAQM will help to focus and co-ordinate action so as to help boroughs deliver improvements on the ground to reduce emissions, concentrations and exposure to particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂) as well as to more generally raise awareness about air pollution.

It is also hoped that this renewed focus on and commitment to LAQM in London will help London boroughs to secure, maintain and where appropriate, increase, their air quality resources over the coming years. To support this we want to make sure that air quality resources are targeted in a way which means they have maximum impact. Accordingly a key priority is improving and enhancing the existing LAQM process while reducing the overall reporting burden on London boroughs, to enable resources to be focused on action planning and implementation. This is mainly achieved by providing clear guidance, templates and data. Through a new LLAQM system the Mayor wants to ensure that air quality is given high priority in boroughs across London, and to ensure co-ordination of action to deliver measureable improvements in air quality.

With all London boroughs containing areas which exceed the NO₂ limit values, and sharing clear legal obligations to take appropriate action, it is essential that we work together to reduce pollution and improve public health.

2. Legal basis

Directive 2008/ 50 EC on Ambient Air Quality and Cleaner Air in Europe ("the Air Quality Directive") sets legal limits and targets for air pollutants for the protection of human health. Compliance with the Directive is an obligation of the UK under the EU Treaties which applies to all arms of the State within their areas of competence, including the Mayor and the 33 boroughs. The UK is currently in breach of limit values for NO₂ and the European Commission has started infraction proceedings to require action to be taken to address the breach.

The legal basis for the Mayor's proposed new LLAQM system is Part IV of the Environment Act 1995 ("1995 Act"), which sets out the boroughs' local air quality management functions. The Mayor has reserve powers under the 1995 Act within the Greater London area under which he or she may direct the boroughs in the performance of their LAQM functions. The Mayor may also direct them to take such steps as are considered appropriate to implement and/ or to bring any current infraction of that Directive to an end as soon as possible, particularly as regards any current breach of NO₂ limit values in their areas.

The Mayor may give boroughs guidance as to how they are expected to discharge their LAQM functions to facilitate the exercise of any of his own reserve functions under the 1995 Act.

The Mayor's proposals for a London system build on the existing national LAQM process but incorporate a number of changes and additions. The proposed LLAQM framework sets out the Mayor's expectations as to the actions boroughs will take to improve air quality in London and indicates where he would be minded to intervene and use his formal reserve powers to make directions under the 1995 Act if appropriate action were not taken.

The Government has set out a policy statement under Part 2 of the Localism Act 2011, which provides useful context for why a revised London Local Air Quality Management framework is proposed and underscores the point that taking effective action is a shared responsibility. That Act contains a procedure that enables the Government, if a fine is imposed on the UK by the European Court of Justice, to require public bodies it considers responsible for the infraction to pay a financial penalty. Paragraph 9 of the policy statement states:

Article 4(3) of the Treaty on the Functioning of the European Union sets out that:

"States shall take any appropriate measure, general or particular, to ensure fulfilment of the obligations arising out of the treaties or resulting from the acts of the institutions of the Union."

All public authorities are subject to this duty.

Given this it is essential that all levels of London government work together to reduce pollution, and that there is a clear audit trail that will help demonstrate that all boroughs are delivering on this important agenda.

3. LLAQM and the National System

The GLA has worked closely with Defra to develop these proposals. Defra are in the process of developing their own proposals for a revised national system for the rest of England, with a view to having this in place in the middle of 2016.

Defra are currently revising the 2009 LAQM Technical Guidance. The GLA will work jointly with Defra on the revision of the main document, and the proposal is that the London system will utilise this national document as a basis to create its own London-specific LLAQM Technical Guidance, which will be broadly similar to the national guidance but will incorporate the London-specific elements. The GLA will also develop a LLAQM Policy Guidance document. Drafts of the Technical and Policy Guidance documents will be sent to boroughs for consultation at the end of this year, and finalised in early 2016.

The London-specific LLAQM Technical Guidance and Policy Guidance documents will only be relevant for London boroughs, and will be the documents that London boroughs should refer to. Defra has agreed that London boroughs will not be subject to the national Guidance or reporting regime. London boroughs will, however, be subject to the same national air quality legislation and regulations.

Wherever possible the London system will align with the Defra system, but with a number of differences which reflect London's unique circumstances.

4. Proposed changes to London system

Please note that the question numbering in the online consultation response form differs from the question numbering below, because the online form includes numbered free text boxes to allow for additional comments under each proposal, this pdf document is for background and reference only, and the online form should be used for all consultation responses.

The draft proposed changes are:

a. Removal of reporting requirements for four pollutants where limit values have been consistently met

In line with Defra's national proposals, 1,3 Butadiene, Benzene, Carbon Monoxide and Lead will be removed, for local authority reporting purposes, from the Air Quality (England) Regulations 2000 (as amended). Further details on this can be found in the [Defra consultation documents](#).

Question 1: Do you support or oppose these changes in reporting requirements?

b. Role for local authorities in working towards reductions in PM_{2.5}

In line with Defra's national proposals, local authorities will be given a role to work towards reducing emissions of PM_{2.5} within statutory guidance. PM_{2.5} is a very important area of focus due to the well-documented health impacts and the risk of failing to meet legal limits.

This will align with the current Defra proposals (further details of which can be found in the [Defra consultation documents](#)). Defra currently fund sixteen PM_{2.5} monitors in London and, due to the high cost, the LLAQM will not place any additional requirements on boroughs to monitor PM_{2.5}. However, to assist local authorities with understanding of PM_{2.5} in their local area the GLA will provide modelling through the London Atmospheric Emissions Inventory (LAEI). Boroughs will not be required, though they may choose, to carry out local PM_{2.5} monitoring and modelling, and will be invited to consider inclusion of PM_{2.5} in their AQMAs.

This new role will sit within Guidance only, so there are no new statutory obligations regarding this issue. However, it is suggested that where possible boroughs try to allocate Public Health funding for working towards this where possible, as mortality from exposure to PM_{2.5} is an indicator within the Public Health Outcomes Framework.

Question 2: Do you support or oppose new guidance incorporating a new duty to work towards reducing emissions of PM_{2.5}?

c. Streamlining of reports

In line with Defra's national proposals (but with some London-specific differences), the Local Air Quality Management reporting process will be streamlined and the only report that will be required from local authorities in London is a single Annual Status Report (ASR). The draft template ASR tailored to London's specific requirements is attached in Appendix I. This will replace all other reports which previously had to be submitted as part of the LAQM process including Progress Reports, Updated Screening Assessments (USAs) and Further Assessments.

Boroughs will be required to complete their ASRs for each calendar year from 2015 onwards, by April of the following year (the first ASR will therefore be required by April 2016).

ASRs will include a new public-facing executive summary which boroughs may make available on their websites. The current proposal is that boroughs will not be obliged to complete this short report, but they are strongly encouraged to do so as it will be a useful tool to help promote air quality locally. The Mayor also intends to publish these on the GLA website on behalf of those boroughs who produce them.

Question 3: Do you support or oppose the streamlining of the existing reporting process?

Question 4: Do you support or oppose the introduction of a new public-facing executive summary?

Question 5: Do you think the public-facing executive summary should be compulsory or voluntary?

Question 6: Do you have any comments about the template reports that have been provided with this consultation?

d. Air Quality Management Areas

The statutory process to create or revoke Air Quality Management Areas (AQMAs) will not change. In accordance with current practice, any declarations of an AQMA should be sent to the GLA for consideration. However, there are some changes to the way in which local authorities will be required to review and assess their existing AQMAs.

As USAs and Further Assessments are being removed, the historic mechanism for ensuring that AQMAs are still valid will no longer be in place. In order to address this, but still ensure that burdens on boroughs are kept to a minimum, boroughs will be requested to undertake a desktop assessment of AQMAs every four years.

To ensure that this is not overly onerous the majority of the information required for this will be provided by the GLA via the London Atmospheric Emissions Inventory (LAEI) air quality modeling, and Defra via their air pollution maps. Furthermore, this data will be packaged on a borough basis to ensure the additional burden on local authorities will be minimal. Boroughs will also need to use local automatic and diffusion tube monitoring data to assess their AQMAs in addition to any other resources they have available such as air quality modelling undertaken for other purposes. It is proposed that the process will be as follows:

- Reassessments of AQMAs are to be considered every 4 years to coincide with the publication of LAEI concentration maps in Autumn of the previous year. AQMA reassessment will therefore be undertaken in 2016, 2020 and 2024.
- As a first step boroughs will briefly assess trends in monitored concentrations in the usual way as part of their annual ASR reporting. If it is clear from this monitoring that no significant or major increases or decreases in pollution concentrations are evident, and therefore no change in terms of breaches of the limit values, no AQMA re-assessment is required and the following steps may be skipped. The threshold for significant or major changes will be defined in detail in the proposed Technical Guidance document (which will be released for the new LLAQM system after the consultation).
- As concentrations have not changed significantly in London over the past four years in a way that would impact on the potential to exceed limit values, it is unlikely that any borough will need to reassess their AQMAs in 2016. However, if the trend analysis indicates that there may be a significant or major change, boroughs are invited to reassess their AQMA's as follows:
- The LAEI will provide the following for boroughs:
 - Concentration maps (for annual PM_{2.5}, PM₁₀ and NO₂)
 - Pie charts of NO₂ emissions by source
 - Residential population in NO₂ exceedance areas
 - Re-assessment of GLA Focus Areas, with accompanying breakdown of emissions in the focus areas to inform action planning
 - Maps of NO₂ exceedance areas within each borough.

Boroughs will be expected to assess the above, as well as their own monitoring and trend data, and if there are still areas of exceedance across a borough's area, the AQMA would remain in place as is. Boroughs will simply need to complete a brief declaration to this effect, which would then be submitted as part of the ASR report.

If the above process indicates that an AQMA is no longer required for a certain pollutant, or that the geographical extent of the AQMA could be reduced, it will be entirely at the borough's discretion as to whether to revoke or reduce the AQMA (if concerned solely with one pollutant) or to remove that pollutant from the AQMA, which would remain in place for others that are in exceedance. For example, many boroughs continue to include PM₁₀ even though objectives are being met, because of the extensive evidence of adverse health impacts at levels lower than the current limit values, and this approach is encouraged.

If the above assessment indicates that an area of exceedance is not covered by a current AQMA, boroughs are required to undertake the process of extending their AQMA area as soon as possible, in line with current statutory obligations. Where the evidence exists that an AQMA should be extended this process must be undertaken. If any changes are proposed to an AQMA which will affect an Environment Agency (EA) regulated site, the EA must be consulted prior to this.

Question 7: Do you support or oppose the proposed changes to the way Air Quality Management Areas are re-assessed?

e. Considering and reporting on air quality focus areas

As AQMAs are so large, often covering the whole of London boroughs, they do not necessarily help to target action in the most problematic areas, see map in Figure 1, as compared with the map of GLA Air Quality Focus Areas, Figure 2. Boroughs will therefore be encouraged to consider any locally identified pollution hotspots as well as the GLA Air Quality Focus Areas when developing their Air Quality Action Plans, and should concentrate action and project delivery in these areas as far as is practicable. Of course, where a focus area is exclusively made up of a through-route or a TfL-managed road where boroughs cannot identify any suitable interventions they could undertake, there is no expectation that any action will be undertaken.

This element of the LLAQM is intended to ensure that action is concentrated in areas of high pollution and high exposure where reasonable/practicable. To further enhance this process, the GLA is also keen to work with boroughs to review existing GLA Air Quality Focus Areas, and where appropriate, add locally-identified "Local Focus Areas" to the list of GLA Air Quality Focus Areas. Local Focus Areas may include, for example, a polluted area which hosts a number of sensitive receptors such as schools and hospitals that the borough wishes to focus on.

It is suggested in the Impact Assessment which accompanies this consultation that a suitable threshold for a Local Focus Area is if current measured or modelled levels of NO₂ are greater than 54µg m⁻³, as concentrations of this level indicate that pollution is unlikely to drop below 40µg m⁻³ by 2020. However, in practice, as predicted NO₂ reductions have failed to deliver in the past, Local Focus Areas could be considered for areas where pollution measures 48µg m⁻³ or above. When declaring a Local Focus Area, exposure is also a key consideration; this designation should be restricted to areas with high population exposure. Further details can be found in the Impact Assessment, Appendix IV.

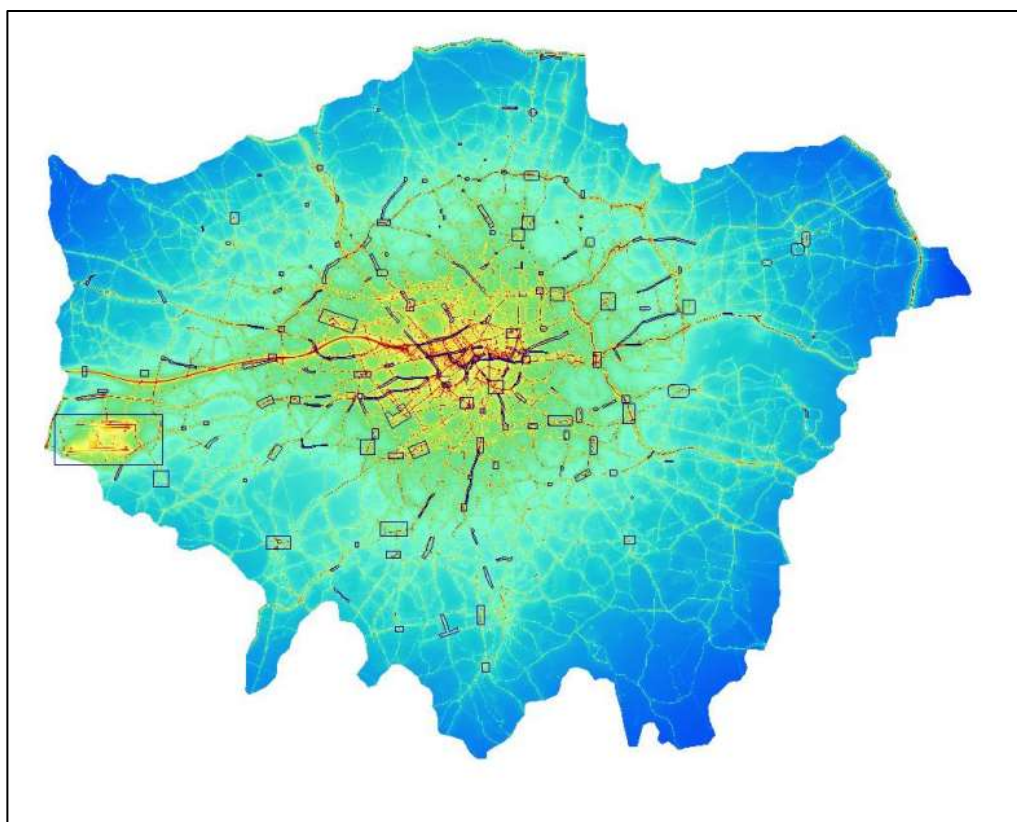
Boroughs are also encouraged to focus on industrial areas with high population exposure which receive significant numbers of complaints and which exhibit (either through monitoring or visual assessment) an ongoing dust issue. The identification of an area such as this can be based on one or more of the following: complaints; monitoring data; modelling data; visual inspections. Boroughs should consult the Environment Agency (EA) regarding any EA-regulated sites.

Boroughs should advise the GLA of any plans to nominate a Local Focus Area, and the GLA can potentially assist with ongoing modelling and assessment of areas through the LAEI to ensure any additional burden on boroughs is minimised. Local Focus Areas are designed to be local tools to help boroughs deliver action, but not to create additional bureaucracy. Boroughs will therefore not be subject to any restrictions or requirements regarding identification of these areas.

Figure 1 Map of Air Quality Management Areas (AQMA's represented in orange)



Figure 2. Map of GLA Air Quality Focus Areas



Question 8: Do you support or oppose the proposal for boroughs to consider GLA Focus Areas when action planning?

Question 9: Do you support or oppose the proposed introduction of the facility for boroughs to identify their own Local Focus Areas?

Question 10 [for Local Authorities only]: Do you have any locations which you may wish to consider nominating a Local Focus Area?

f. Action Planning

Boroughs with a declared AQMA are required to have an Air Quality Action Plan (AQAP). Under LLAQM boroughs will be expected to update their AQAPs every five years as a minimum. AQAPs are subject to public and stakeholder consultation and are subject to consideration by the Mayor before they can be adopted. AQAPs do not need to be elaborate or provide lots of detailed background information and narrative. The key point about them is that they contain appropriate actions and commitment to deliver them.

There are a number of proposed improvements to the way that boroughs undertake air quality action planning within the proposed LLAQM Framework. The two major improvements proposed are:

- The GLA will provide a **template for Air Quality Action Plans**. This should reduce the administrative burden on boroughs, especially when combined with the additional modelling, maps and other data that will be provided through the LAEI (please see point d, above, for further details of what will be provided from the LAEI).

A proposed draft Air Quality Action Plan Template is available in Appendix II. Boroughs will be able to use this template as a basis for all future Air Quality Action Plans, however, this template can be used flexibly, and its use is optional. Boroughs will be free to add additional sections, and are encouraged to include images and any additional local context.

- The GLA will provide an **Air Quality Action Matrix** (proposed draft included in Appendix III), which assesses and prioritises a range of actions that boroughs can take to improve local air quality. Boroughs will be expected to use this Matrix when developing new Air Quality Action Plans but will not be obliged to deliver any specific actions at this time.

The GLA will keep the matrix and AQAP template under review and may require boroughs to deliver specific action in future if necessary, in keeping with the Mayor's formal powers of direction. In order to ensure that Action Plans are useful living documents, each year as part of the Annual Status Report boroughs will be required to:

- Briefly report on the status of all projects within the Action Plan
- Remove all projects which were completed more than a year previously (by simply deleting the row)
- Add details of any new projects delivered the previous year and/or proposed for the following year. This will be enabled simply by adding rows at the end of the table.

Additionally, annually, boroughs will also be invited (but not obliged) to:

- Appraise the Action Matrix to see if any additional actions could be included

- Appraise the summary of borough action published by the GLA to see if any actions could be replicated or if there are any partnership opportunities (see below for details of this).

The above will be undertaken solely in the Annual Status Report – boroughs will not be required to make amendments to the original AQAP document.

In addition to providing the template Action Plan, and the Action Matrix, which will be regularly reviewed, the Mayor has listened to feedback from boroughs about what would be most helpful in terms of co-ordinating regional action. The GLA will therefore commit to compiling a compendium of new/innovative/successful actions that have been taken nationally or by London's boroughs, and will circulate this to all 33 to help share, recognise and support best practice across London.

Additional funding for implementation of Action Matrix measures is being provided through the Mayor's Air Quality Fund and Local Implementation Plan funding.

Question 11: Do you support or oppose the provision of the AQAP template and the Action Matrix?

Question 12: Do you support or oppose the requirement for boroughs to update their Action Plans every five years?

Question 13: Would you find an annual compendium of actions undertaken by boroughs helpful?

Question 14: Do you have any comments on the AQAP template and/or the Action Matrix?

g. Planning and development control

The construction industry is responsible for around 15% of PM and 12% of NO_x in London. In 2014 the Mayor published his Sustainable Design and Construction and his Control of Dust and Emissions from Construction Supplementary Planning Guidance documents, which are enforceable at the borough-level.

In September 2015 the Mayor will launch the Non Road Mobile Machinery (NRMM) Low Emission Zone, which will set emissions limits for construction machinery through planning mechanisms. The GLA will provide materials and training to support the enforcement of this. This is part of the London Plan and was formally consulted on as part of the consultation for the Sustainable Design and Construction SPG.

As part of their planning duties boroughs will be required to enforce the requirements of the NRMM Low Emission Zone, as well as enforcing the other policies within the two supplementary planning guidance documents for major developments. Boroughs will be asked to report on their delivery of these as part of LLAQM. This will simply be a short table where the number of planning applications subject to these conditions is noted. No further details or onerous reporting will be required. Please see the ASR template (Appendix I) for details.

We are aware of the fact that for many boroughs this will be a simple case of transferring statistics which are already recorded as part of your internal processes, but that other boroughs do not keep any centralised record of air quality input into the Planning process. We are therefore keen to hear from all boroughs as to how easy or difficult it would be to deliver this and what help, support, or grace period you might need in order for this not to be unduly burdensome.

Boroughs are encouraged to make applications (ideally jointly to cover a larger geographic area) to the Mayor's Air Quality Fund for projects that will support the enforcement of the NRMM LEZ and other initiatives to reduce pollution from new developments.

Question 15: Do you support or oppose the inclusion of the requirement to report on local enforcement of air quality planning policies?

Question 16: How easy or difficult would it be for you to record information on air quality input into planning applications?

Question 17: Would you require a grace period in order to start collecting information on air quality input for planning applications?

h. Accountability and Responsibility

We have received feedback from many stakeholders that there is often a lack of engagement and joint working between the various local authority departments that can impact on air quality. Air quality officers sit in a variety of different teams depending on the structure in the borough (such as Environmental Health, Public Health, or Sustainability), but wherever they sit, cooperation with other departments is needed. For effective action it is crucial that there is engagement and understanding between relevant departments.

It is particularly important for Directors of Public Health (DsPHs) and Heads of Transport to take responsibility and ownership for air quality in the borough. In order to help facilitate this we would encourage all boroughs to engage extensively with these and other senior officers while developing their AQAP, and where possible obtain formal sign off on AQAPs from Directors of Public Health and Heads of Transport, to ensure that there is a formal recognition of shared responsibilities.

Question 18: How far do you agree or disagree that this approach would help to ensure DsPHs and Heads of Transport are more aware of and engaged with air quality?

i. Monitoring

The strategic monitoring network is crucial in terms of our understanding of pollution; assessing the impact of interventions to reduce emissions; and raising awareness. It is therefore extremely important that local authorities ensure the maintenance of existing monitoring networks. It is also important to ensure that where possible the network can be expanded to accommodate future needs; such as a pan-London PM_{2.5} monitoring network.

To safeguard existing monitoring, boroughs will be required to consult with the Greater London Authority in writing (e.g. by email setting out the reasons etc for the change and how appropriate monitoring in line with the Air Quality Directive will be maintained) on any proposals to remove, move or add council-owned automatic NO₂ or PM monitoring stations, giving at least two months' notice of any proposed changes. New monitors should always be sited in line with requirements set out in the Directive and associated regulations, unless there are specific circumstances which would mean this is not possible or appropriate, which should be explained.

Question 19: Do you agree or disagree with this approach?

Question 20: Would you like to see firmer statutory requirements regarding monitoring, for example, a requirement that all boroughs install/retain at least 2 automatic NO₂ and PM monitors (1x roadside and 1x background), in addition to any AURN monitors?

Question 21: How would any requirement to maintain two automatic monitors impact on your borough? (Please note that this does not form part of the official LLAQM consultation proposals at present, we are simply soliciting opinions on this)

j. Cleaner Air Borough Status

Boroughs will be encouraged to report on their progress against the six Cleaner Air Borough (CAB) Criteria as part of the Annual Status Report (ASR). This will be on a voluntary basis and would involve completing a one page table within the ASR. Please see the draft ASR in Appendix I for details. Satisfactory completion of the table will entitle boroughs to retain CAB status which is linked to MAQF funding as well as being a useful communication and awareness tool to highlight and reward boroughs that are committed to taking action to improve air quality.

The GLA will undertake an annual review of the CAB status of each borough based on the information submitted, which will be able to retain their CAB status if they:

- Have completed the table;
- Have demonstrated significant action against all six of the CAB criteria within their ASR.
- Are in fulfilment of all of their statutory duties and have provided any other information reasonably requested by the GLA (such as the details of Part B Processes for the LAEI).

It is suggested that the GLA will annually submit a report on local authority action on air quality to London Councils' Transport and Environment Committee (TEC). This will be an opportunity to highlight any areas of concern and under-performance, particularly with regards to statutory reporting, as well as being an opportunity to highlight best practice across London.

Question 22: Do you support or oppose the inclusion of Cleaner Air Borough reporting within the Annual Status Report?

Question 23: Would you find it useful if a Cleaner Air Borough logo was provided for you to display on websites/documents etc.?

Question 24: Would an annual progress report to London Councils' Transport and Environment Committee (TEC) be helpful?

k. General feedback

Question 25: Please provide any further comments on the LLAQM proposals and/or provide any other suggestions for methods that can be employed (other than funding, which will continue to be provided via MAQF and LIPs) to help support and encourage work on air quality in your borough.

5. Impacts of proposals

Air quality

Using the LAEI 2015 emissions projections and the maximum emissions savings estimated to be possible from delivery of the actions within the Air Quality Matrix which are quantifiable, the draft Impact Assessment estimates that there could be up to a 16% reduction in NO_x emissions, if all boroughs delivered all actions within this to their fullest. In reality such a significant impact is unlikely as boroughs will not have the resources to deliver all actions identified in the Action Matrix. Nevertheless it does demonstrate the potential of robust local action coordinated through a new enhanced LLAQM process.

Costs to boroughs

We estimate that for those boroughs that are currently fulfilling their statutory duties there would be a small net reduction in officer time needed (equivalent to up to £148,000 over three years across the London boroughs) to deliver the reporting elements of the new LAQM arrangements in London. This would then be expected to be redirected to deliver more effective action to improve air quality.

However, this would only equate to a very small amount per borough over the three years so it is in no way suggested that there should be any reduction in officer time dedicated to improving air quality. This new framework is simply designed to help better coordinate action and reporting to help address this priority issue. In recognition of the importance of this agenda, boroughs will also be able to access additional financial resources through the Mayor's Air Quality Fund (MAQF) and Local Implementation Plan (LIPs) funding.

The reductions in time spent reporting are the result of new streamlined reporting requirements combined with the GLA providing additional bespoke information prepared for each borough and absorbing the cost of this (see below). This approach was highly successful when the GLA prepared bespoke air quality chapters for each borough for their Joint Strategic Needs Assessment. The GLA will expand this approach and provide a wider array of air quality emissions, concentrations and mapping resources to boroughs.

Further information is set out in the Impact Assessment which accompanies this consultation in Appendix IV.

Costs to GLA

The new LLAQM system results in additional costs to the GLA. There are additional costs for the staff time to manage the new LLAQM as well as additional costs to develop the bespoke mapping and modelling from the LAEI and providing this data broken down by borough.

Further information is set out in the Impact Assessment which accompanies this consultation in Appendix IV.

Equalities

The impacts of the proposals were also assessed in terms of equalities and it was found that there were no impacts either positive or negative in terms of the new statutory system in itself. However, if the system helps to deliver enhanced action on air quality locally, as it hoped, this would have a positive impact in terms of equalities because improvements in air quality are likely to enhance the wellbeing of those living in lower income areas, because these areas are more often located in areas of high pollution.

6. What are the key documents for the proposed new LLAQM?

Document	Content	Status
London Local Air Quality Management Framework Summary of Proposals (this document)	Outline of proposals and consultation questions	Published with consultation (this document)
Consultation Questionnaire	Online consultation form	Published with consultation. Available at http://www.surveygizmo.co.uk/s3/2162651/London-Local-Air-Quality-Management-LLAQM
Draft Annual Status Report, ASR Executive Summary, and Air Quality Action Plan Template	Draft templates for these two statutory documents	Published with consultation. Appendix Ia, Ib and III
Draft Air Quality Action Matrix	Prioritised spreadsheet of actions for local authorities to have regard to when action planning	Published with consultation. Appendix II

Impact Assessment	Impact Assessment of LLAQM proposals	Published with consultation. Appendix IV
GLA's LLAQM Policy Guidance and Technical Guidance (to replace Defra's PG.09 and TG.09)	Updated versions of the current LAQM Guidance documents	Drafts to be provided to boroughs in late 2015

7. Annual Status Report Submission Process

Statutory reports will continue to be uploaded via the Defra LAQM Report Submission Website.

8. Consultation Responses

Consultation responses must be submitted via the online questionnaire at <http://www.surveymoz.co.uk/s3/2162651/London-Local-Air-Quality-Management-LLAQM> by 25th September 2015

9. Next Steps

To implement the proposed LLAQM Framework (subject to consultation) we would suggest the timeline below.

Action	Date
Launch of 10 week consultation	15 th July 2015
Close of consultation	25 th September 2015
Publication of summary of consultation responses and finalised LLAQM	November 2015
Circulation of draft LLAQM Technical and Policy Guidance to boroughs for comments	December 2015
Publication of final Technical and Policy Guidance and formal launch of LLAQM	February 2016
First ASRs under LLAQM to be submitted by Boroughs	April/May 2016

Ends