

MAYOR OF LONDON

LONDON LOCAL AIR QUALITY MANAGEMENT (LLAQM)

Consultation Report to the Mayor

XX July 2019

Chapter 1: Introduction and background

About the London Local Air Quality Management (LLAQM) Framework

London's toxic air is a public health crisis and thousands of Londoners are dying prematurely each year as a result. This crisis requires action at every level – from European cooperation to national, regional and local policies through to the individual choices we all make.

The Mayor of London is delivering a bold package of measures to help bring London's air into compliance with legal limits, including introducing the world's first Ultra Low Emission Zone and creating one of the cleanest bus fleets in the world. He is going even further by committing to bring air pollutant levels into compliance with World Health Organization (WHO) recommended guidelines by 2030.

There is a critical role for Government who control many of the levers to tackle air pollution, including funding, fiscal measures, and provision of more effective statutory powers. The Mayor continues to request more action from Government and has set out what needs to be done at the national level in his London Environment Strategy.¹

Local Authorities have a very important role in delivering air quality improvements within their boundaries. They have a unique understanding of local issues, opportunities and stakeholders, and they hold a number of key levers. For example, they control and manage most roads and set parking policy and charges. They also have the powers to enforce control of emissions through planning, anti-idling legislation and smoke control zones. Some of these powers do require strengthening by Government to increase their effectiveness.

The national Local Air Quality Management (LAQM) process has been in place for 17 years and the devolved London Local Air Quality Management (LLAQM) system has been in place since May 2016. The basic statutory framework is put in place by Part IV of the Environment Act 1995 ("the 1995 Act", as amended, and "Part IV functions") and national air quality regulations. This remains in place and is applicable to London's 32 boroughs and the City of London (collectively referred to as "the boroughs"). It was agreed with the Department for the Environment Food and Rural Affairs ("Defra") in 2016 that the relevant local air quality management policy and technical guidance for London should be different from that in the rest of the country in recognition of the particular challenges the capital faces. Defra agreed that policy and technical guidance for London should be issued by the Mayor, in recognition of his London-wide supervisory role. London boroughs therefore need only refer to LLAQM: Policy Guidance 2019 and to the accompanying LLAQM Technical Guidance 2019 ("LLAQM.TG(19)"), as issued by the Mayor from time to time, rather than national guidance issued by Defra.

There has been a host of impressive air quality achievements delivered by boroughs. This includes a world-class air quality monitoring network, initiatives to reduce emissions and exposure at schools and hospitals, innovative Low Emission Neighbourhoods and cycling schemes, and the tackling of emissions at construction sites. However, whilst boroughs are often working with very limited resources, there is a need for more coordinated, focused, consistent action across London to help deliver the much-needed improvements in the capital's air quality. For this reason, the Mayor is proposing changes to the LLAQM system.

¹ www.london.gov.uk/what-we-do/environment/london-environment-strategy

About the consultation

This document summarises responses to the Mayor's consultation on his proposals for revisions to the LLAQM system and the Cleaner Air Borough Criteria. For more detail on the proposals, please refer to www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs.

Proposals consulted on for the revised LLAQM include a full refresh of the Air Quality Action Matrix and Cleaner Air Borough criteria, and several updates to the Policy and Technical Guidance. Objectives of the revisions are:

- To ensure boroughs are taking suitably ambitious and targeted action, which supports Mayoral objectives as set out in the London Environment Strategy and elsewhere;
- To ensure that London boroughs continue to work towards achievement of World Health Organization recommended guidelines for pollutants even when legal limits are met;
- To update information in the guidance documents to reflect new research, policies, and priorities; and
- To update Cleaner Air Borough Status (a recognition scheme for boroughs that was introduced under the previous Mayor) so that it is transparent and fair, now promotes continual improvement, and clearly aligns with new LLAQM priorities.

The consultation was open for eight weeks and closed on 20 May 2019. There were 18 responses to the consultation, two of which were from private individuals; the other 16 were boroughs. An overview of respondents is annexed.

Chapter 2: Summary of consultation responses

This section provides a brief overview of the outcome of the consultation and how this has impacted upon the final proposals.

1. Monitoring

Proposal made/ Feedback sought: Boroughs should, as a minimum, maintain current levels of air quality monitoring.

Responses: All respondents answered this question, with most generally supporting the proposal (only four disagreed). Areas of concern, disagreement and clarification sought included:

- Whether this requirement should apply equally to continuous and diffusion tube monitors, as often the latter are used for time-bound/ specially commissioned projects. This point was raised by several respondents

GLA response: The proposal applies to all continuous (automatic/reference level) monitors, but only to diffusion tubes that have been in position for two years or more. The guidance will be updated to reflect this.

- Whether this requirement applied for privately owned and operated sites, over which they would lack jurisdiction

GLA response: This requirement applies only to borough sites. The guidance will be updated to reflect this.

- The financial position of boroughs and so their ability to maintain / improve the network (several respondents). The limitations of the Community Infrastructure Levy (CIL) funding was highlighted by two respondents, and one respondent suggested the GLA make a financial contribution to boroughs to support their monitoring activities, especially in areas outside of their jurisdiction

GLA response: The Mayor appreciates the funding constraints that boroughs are under. This is why the LLAQM does not require boroughs to add additional sites; the requirement is only to maintain existing monitoring levels. The GLA provides funding to boroughs for air quality and sustainable transport initiatives through the Mayor's Air Quality Fund and Local Implementation Plan funding. Delivering local monitoring is and always has been one of the key LAQM requirements, and therefore needs to be funded appropriately by boroughs.

The GLA is also providing additional monitoring through the Breathe London project, which has installed 100 air quality sensors across London (at least one in every borough). Whilst not an alternative to reference quality monitoring this project helps to provide wider spatial understanding of pollution concentrations.

- Whether a minimum requirement discourages boroughs to improve their monitoring, a point raised by one respondent

GLA response: The minimum requirement safeguards existing monitoring, and increasing monitoring will be recognised through the Cleaner Air Borough recognition scheme.

- Whether there needed to be a statement in the guidance about the minimum monitoring that boroughs should be doing, to help ensure fairness across boroughs (one respondent)

GLA response: As installing new monitoring equipment is very expensive, it was not deemed viable to require boroughs to install more monitors. The key requirement is to maintain existing monitors so that we retain ongoing data collection from existing sites, to assess trends, and the impact of new air quality policies and initiatives on pollution concentrations.

- The need for a strategic assessment of London's monitoring, with a steer from GLA on what boroughs need to contribute to this (one respondent)

GLA response: The GLA is planning to undertake this strategic assessment later in the year.

- One respondent objected to the existing (and retained) requirement to seek permission from the GLA to install, decommission or move air quality monitors.

GLA response: This requirement is essential in terms of safeguarding sites that are strategically important for the assessment of trends and/or the impact of specific policies and initiatives, such as Low Emission Bus Zones, many of which can operate across multiple boroughs. If there is an essential reason for a borough to move/remove a site then this can be discussed with the GLA to agree a suitable resolution.

- A request to share learning from the Breathe London project, so that boroughs can apply these to make best use of their own sensors (one respondent)

GLA response: A report sharing learnings about the monitors and the data capture will be published and shared with boroughs. It is anticipated that this report will be completed in the winter 2019/20.

2. PM2.5

Proposal made/ Feedback sought: Boroughs should maintain AQMAs for PM10 even where the limit value / objective is met, so as to provide an interim mechanism for a focus on PM2.5 reduction measures.

Boroughs should support the Mayor's commitment to meet the WHO guidelines for PM2.5, which is more ambitious than the goal in the new national Clean Air Strategy. The government's goal to reduce the number of people exposed to PM_{2.5} above the WHO target by 50% by 2025 which would leave many Londoners still exposed to the health effects of high levels of pollution.

Boroughs can do this by formally adopting the guidelines at a local level and / or outlining their intention to focus on reducing and monitoring this pollutant in the AQAP.

Furthermore, if funding or opportunities arise for new monitoring, priority should be given to PM2.5.

Responses: All respondents responded to this proposal, with most supporting it fully or in part (15 respondents). Further comments included:

- To effectively target PM2.5, amendments are required to the Clean Air Act / new Environment Bill, including changes to the relevant National Air Quality Objective and enhanced enforcement and permitting powers for NRMM equipment standards, CHP and domestic wood burners

GLA response: Agreed, and the Mayor and London Councils are lobbying Government on these points (the Government has now announced its intention to announce legally binding WHO pm2.5 limits, however, further work is required to ensure the appropriate date for meeting these is adopted).

- Detailed source apportionment data and improved monitoring were identified as ways to help boroughs effectively address PM2.5 at the borough level. Several respondents cited local resource considerations preventing improved monitoring, and one sought a greater steer from GLA on what more each borough should be doing to provide a strategic and robust monitoring network for PM10 and PM2.5 monitors across London.

GLA response: The GLA provides source apportionment at a borough level as part of the London Atmospheric Emissions Inventory (LAEI). The London Datastore² also hosts all the modelling outputs from the LAEI, including a breakdown of emissions by grid square in excel and GIS, which boroughs can use for higher resolution analysis.

A strategic assessment of the current PM2.5 monitoring network will take place later in the year.

- One respondent queried why local authorities were being asked to set measures and invest in equipment relating to PM2.5, when the GLA was communicating that London would be compliant with WHO values by 2030.

GLA response: 2030 is 11 years away, and there are relatively few PM2.5 monitors in London (around 30 for PM2.5 compared to around 120 monitoring NO2). PM2.5 monitors will help to assess progress with reaching and attaining compliance across the capital.

It is also important to note that this is a very ambitious target that will require concerted and joined up effort across all tiers of Government. Furthermore, it is now widely recognised that PM2.5 pollution is highly detrimental to health, and has adverse health impacts at any level.

3. Air Quality Action Matrix

Proposal made/ Feedback sought: The updated Matrix consolidates the actions into 25 key actions for boroughs to take locally. These are ranked in priority order.

² <https://data.london.gov.uk/>

The updated Matrix was sent to boroughs for preliminary feedback in late 2018. This pre-consultation feedback from boroughs has been incorporated into the Matrix where possible. A summary of these comments and changes was provided in the consultation supporting documents.

Responses: Nine respondents had additional comments on the matrix, including:

- Boroughs should retain the ability to select actions appropriate to their particular circumstances and based on local knowledge

GLA response: It is important that there is coordinated and consistent action at borough level using the powers uniquely available to them to address health impacts and achieve legal limits as quickly as possible. This is why delivery of the actions set out in the Matrix is so important. However, the ability to be flexible is not precluded by the Mayor's proposals. Boroughs are encouraged to add additional actions into the Matrix, and to tailor the generic Matrix actions to the local context

- Air Quality Positive and Healthy Streets (Action 9): one responded suggested this needs to be integrated into policies such as the London Plan to ensure planners integrate it into master planning processes

GLA response: Agreed, and these are already included within the draft New London Plan in Policy SI1 for AQ positive and T1, and throughout the Transport chapter for Healthy Streets

- Alerts (Priority 12): one respondent commented that it would be useful to see and learn from case studies regarding the success criteria, such as capturing data related to reductions in hospital admissions and outreach to vulnerable groups

GLA response: Whilst there are no existing data on reductions in hospital admissions, an airTEXT survey in 2018 found that out of 507 subscribers who responded to the survey –

- 97 per cent said that airTEXT increases their awareness of high pollution days
- 83 per cent said that when they receive an airTEXT alert they take action to reduce their pollution exposure
- 94 said that airTEXT is useful to them, with 66 per cent saying that air TEXT is very useful
- 98 per cent said that either they or someone they care for suffers from a health condition adversely affected by air pollution.

Furthermore, a recent paper published in *Environment International* found that certain types of air pollution messaging could produce permanent changes to participants' behaviour to reduce their personal exposure to pollution³.

³ D'Antoni *et al.* (2019) The effect of evidence and theory-based health advice accompanying smartphone air quality alerts on adherence to preventative recommendations during poor air quality days: A randomised controlled trial. *Environment International*. Vol 124, pp216-235.

- Parking policy ('TBC' Priority 23): one respondent wanted this retained in final version, citing it as a crucial tool for boroughs' air quality action

GLA response: Agreed. This is a confirmed action in the Matrix.

- Transport Strategy: one respondent thought that the 'Cleaner Transport' component should require boroughs to develop strategies to reduce the ownership and use of private motor vehicles, consistent with the Mayor's Transport Strategy (MTS)

GLA response: It is agreed that boroughs should be developing borough transport strategies consistent with the MTS. It is expected that key targets from the boroughs' strategies, rather than full strategy detail, be included within the Air Quality Action Plans.

- Car free days: one respondent thought these should be a required component of a larger car/vehicle reduction approach, as it would support boroughs with a more direct policy backing for potentially controversial but big impact work streams

GLA response: Agreed. As per the above, these would be outlined in the borough's transport strategies, and briefly summarised in the Air Quality Action Plan.

- Fleet strategy: one respondent sought clearer definition of the types of training required to meet targets

GLA response: This referred to eco/fuel efficient driving, and that has now been made clearer in the Matrix.

4. Air Quality Action Plans (AQAPs)

Proposal made/ Feedback sought: Boroughs should deliver all actions in the Air Quality Matrix, unless there are extenuating circumstances agreed with GLA. An exception to this is the Low Emission Neighbourhood, if no funding has been obtained from GLA, TFL, or other sources. Boroughs should also commit to and ensure a strong focus on the nine key priority areas.

Boroughs should ensure that all AQAPs have clear, measurable and focused actions with projected benefits wherever possible.

Boroughs do not have to rewrite AQAPs that are less than five years old, even if they are adding new actions or updating targets within existing actions. As part of the Annual Status Report (ASR) process, the action table from the AQAP should be extracted and amended as necessary to reflect the additional actions, key priority areas, and new targets/timescales. Actions planned for the forthcoming year should be clearly identified.

Responses: Of the 15 that responded or had further comments to give, most agreed with these proposals. Additional comments on this stronger focus on the Matrix and keeping Action Tables as live documents included the below:

- One respondent highlighted that their borough would be unable to guarantee compliance with all actions, given Council policies prevent changes to AQAP without formal submission and public consultation

GLA response: Updates can be made as part of the annual report on AQAP actions within the Annual Status Report (ASR), or as a separate document of “additional/new actions”. The AQAP itself does not need to be revised.

- Several respondents cited the need to keep a level of flexibility in actions, given boroughs’ particular local circumstances (including levels of pollution, resources etc)

GLA response: Agreed, and the Matrix actions are designed to be adapted to the local circumstance, and additional local actions added as needed.

- Some respondents cited concerns about resource pressures and so the ability to deliver all matrix actions.

GLA response: The GLA appreciates the pressures on funding. The Matrix has been reduced to the 25 key actions boroughs should be taking to address pollution locally. Although boroughs need to include all actions, most resources should be dedicated to the Selected and High Priority measures.

- Specific clarifications/ steer sought included:
 - o Are boroughs expected to recalculate the priority level (ease of delivery x magnitude of impacts) for their own circumstances and prioritise accordingly?

GLA response: This is not expected.

- o How making changes to action plans, which have been agreed through statutory consultation, should take place. Would boroughs be required to run all potential changes to Action Plans past the GLA ahead of making changes? And would statutory consultees need to be notified of any changes made?

GLA response: The GLA should be notified, through the ASR. No other statutory consultees need to be consulted.

5. Cleaner Air Borough criteria

Proposal made/ Feedback sought: The criteria has been updated to:

- Align with the Matrix categories
- Clearly outline what information is required from boroughs, and how this will be scored.

Responses: Of the 16 respondents that provided comments on this proposal, most (10 respondents) supported the proposal. Additional comments included the below:

- Several respondents sought clarity on the scores required to meet the bronze, silver and gold levels, with some proposing a minimum standard or performance indicators for each. One suggested a weighted score structure, to help boroughs prioritise action, and higher scores apportioned to business engagement and energy efficiency. Another cited concern about the scores being awarded at delivery stage only, as this would overlook the considerable work in advance of this (e.g. engagement with businesses). Another emphasized the need for greater scrutiny than exists for the current CAB programme, proposing a dedicated yearly meeting between the GLA and boroughs to discuss progress and challenges.

GLA response: The exact shape of the scheme will be finalised shortly, and this feedback will help to inform its design. We agree with the need for transparency and scrutiny, and this what the intend for the new CAB scheme to provide.

We agree with the proposal for meetings, and the GLA is now holding all-borough update workshops at least once a year, as well as attending each of the quarterly borough cluster groups and the borough coordinators group whenever possible.

- Some (five respondents) cited the need for flexibility in relation to boroughs' local and specific circumstances, with some concern over the risk of the criteria being overly prescriptive (one respondent). Some (two respondents) queried if boroughs' starting position would be taken into account and if financial incentives would be made available to those attaining the highest standards

GLA response: The criteria that have been set out are designed to be completely clear about what is expected from boroughs to achieve a high status. This is needed to offer a fair and transparent assessment process.

Boroughs will be assessed on the progress and achievements during a given assessment year as far as possible, so their starting position will not have a huge impact. All boroughs, regardless of how advanced there are in their air quality programming, will need to outline what they have achieved in a given assessment year.

- The interplay between the ASR and the CAB application process was highlighted by several respondents. Some wanted information extracted from ASR rather than having separate CAB criteria to fill out (seeing it as a duplication of work since the criteria mirror the matrix), while one respondent suggested keeping the CAB application process separate from the ASR to spread the workload and improve the quality of submissions

GLA response: In their ASRs boroughs provide an annual report on their AQAPs, which outline a whole host of measures, not limited to those in the Matrix, and differ considerably from one borough to the next. It would therefore not be possible to compare AQAP reports in a fair and transparent way.

The purpose of the revised CAB is to ensure that everyone is clear on the criteria and the assessment process. The only way to enable this is to have a separate submission on the CAB status. However, the GLA does appreciate the resource pressure that boroughs are under. The proposed CAB submission process is not designed to be onerous. A brief summary and two short examples for each criterion would usually suffice (i.e., around four to five sentences in total for each).

- The name of the award and communications about it were raised by three respondents. One wondered if the name required a rethink, particularly for central London boroughs where most are exceeding NO2 levels. Another sought further information about how the meaning of the award would be communicated to the public, and another was concerned about the implications for boroughs not achieving gold status, especially due to factors outside of their control

GLA response: The name is now well-known, and is quite clear and self-explanatory, so we have no plans to change it. Status will be awarded based on action taken, not on concentrations, as it is recognised that the latter is not wholly within a given borough's control.

- Comments and clarity sought on specific criteria included:
 - Smoke Control Zones: A suggestion to replace 'enforcement action taken' with 'compliance actions' (to capture all interventions taken to affect change)

GLA response: This will be amended in the criteria to "enforcement/compliance action taken"
 - Idling: A comment that this could not be met by those boroughs that have not been able to adopt enforcement powers

GLA response: All boroughs have enforcement powers as set out in national regulations (although it is recognised that these are limited). The pan-London idling project funded by the MAQF will provide enforcement workshops to help boroughs learn from each other about how to implement more effective local idling orders, and how best to deliver on-street enforcement.
 - Fleet Strategy: A suggestion that other measures in the air quality action be included e.g., FORS accreditation, training etc.

GLA response: These achievements can also be listed.
 - A suggestion to include an additional criterion covering cross-borough working, to encourage cooperation and prevent bronze-silver-gold designation causing inter-borough divisions

GLA response: This is an interesting suggestion but would be difficult to measure as a separate criterion, as it lacks specific tangible outcomes/outputs. However this joint working can be captured in boroughs' responses to the existing criteria.

6. Other comments

Proposal made/ Feedback sought: The Policy Guidance and Technical Guidance contain a number of other smaller updates, such as updating the wording in the Introduction and the Powers of Direction sections of the Policy Guidance, and removing information on screening sources in the Technical Guidance.

Responses: There were a number of additional comments. Those not directly related to the LLAQM have been passed on to TfL or other relevant teams for comment. Those that were specific to individual boroughs and/or not necessarily directly applicable to the wider consultation will be responded to directly by the GLA.

A small number of other minor clarifications and amendments were requested, which have been incorporated.

The significant other comments related to LLAQM were as follows:

- 2.07 Section 88 of the Environment Act gives power to the SoS to issue statutory guidance. Parliament has not given the SoS to delegate this power to a third party eg the Mayor of London. LB Tower Hamlets will have regard to GLA guidance despite GLA guidance being non-statutory. The guidance from the SoS reflects the legal position.

GLA response: All local authorities in England must have regard to the Secretary of State's guidance when discharging their Part IV functions. National guidance (Policy Guidance LAQM.PG(16)) has been issued by the Secretary of State covering the remainder of England except London. However, this statutory guidance states the following in relation to London (see paragraph 1.5):

Supervision of the LAQM system in Greater London has been devolved to the Mayor of London, to whom powers to intervene and direct boroughs have been given under Part IV of the Environment Act 1995. The Secretary of State expects London boroughs to participate in the Mayor's London LAQM framework and have regard to any advice or guidance issued by the Mayor of London as to the performance of their functions under LAQM.

- Para 6.15 (on Non Road Mobile Machinery): this paragraph currently recommends the use of a specific planning condition. We use a bespoke Code of Construction Practice (COCP) mechanism for NRMM. As such we would recommend this paragraph is amended to include: 'or another suitable mechanism' or wording to that effect. Otherwise, confirmation that the wider COCP planning condition constitutes a planning condition capturing NRMM would be welcome.

GLA response: This change will be made in the guidance.

- A question was raised regarding the support to be provided to boroughs, querying why the newsletters/GLA updates were not included in this list, and whether they will still be provided.

GLA response: They will still be provided, and the list will be updated to include them.

- A comment was made welcoming the addition of grounds of schools, hospitals, and care homes as locations of relevant exposure with the Guidance, and a request was made to add residential gardens to this.

GLA response: We will add residential back gardens to the guidance.

- A question was raised about whether the WHO NO₂ limits are completely protective of health, and if there is therefore no need to try to reduce them lower than this, and if so, if that could be stated in the LLAQM documents

GLA Response: When the WHO last reviewed their air quality limit value for annual NO₂ they acknowledged that "findings provide some support for a lowering of the current annual NO₂ guideline value." However due to the potential that the effects reported were due to other primary and secondary combustion-related products the limit remained at 40 $\mu\text{g m}^{-3}$. The WHO also acknowledged "there may be direct toxic effects of chronic NO₂ exposure at low levels". It is our understanding the WHO is currently revising their air quality guidelines and a reduction of the NO₂ annual limit value is being considered. This will be informed by more recent studies that have found evidence of health effects below 40 $\mu\text{g m}^{-3}$. We therefore feel it is appropriate to have ambition to exceed the target.

- A comment that new actions outlined in the ASR should be in a separate table

GLA Response: They can be in a separate table, or just marked as new actions in the main table.

- A request that the pan-London update meetings at the City Hall also be delivered as a webinar, available to view after the event. These are important events and making them available on line will enable a wider range of officers to attend.

GLA Response: We will look into the technical feasibility of this and action if possible.

- A request for the Mayor to identify where it may be appropriate to informally apply National Air Quality Objective's (NAQO) to indoor air quality.

GLA Response: The LLAQM and the NAQO relate only to ambient air quality. However, the GLA is doing additional work on indoor air quality and we will consider this suggestion in that work.

- A request that the Mayor provides an addendum for London when an updated Clean Air Act is produced, identifying how the legislation should be implemented in the context of London to ensure consistency across boroughs.

GLA Response: When the proposed Clean Air Act is introduced we will consider how best to support boroughs to deliver it and will certainly consider this option.

- The issue was raised about the quality of GLA London-wide modelling compared to local bespoke modelling

GLA Response: The LAEI modelling and local council modelling are done on different scales and for different purposes, and we provide this modelling to assist boroughs to get a picture of pollution across the borough. Boroughs are encouraged to undertake locally modelling where possible, especially for major schemes.

Chapter 3: Conclusions and recommendations

This report has analysed the issues raised during the public consultation on the Mayor's proposals for revisions to the LLAQM system. It contains GLA officers' recommendations for any further changes to the Air Quality Action Matrix and Cleaner Air Borough criteria, and the Policy and Technical Guidance. Based on consultee feedback, there is overall general support for the Mayor's proposals, with any further suggested changes being minor amendments, rather than wholesale or substantive revisions.

Although only half the boroughs responded, GLA officers held/attended six meetings with borough officers during the period, so boroughs also had an opportunity to share any thoughts and concerns through these forums. Letters were also sent to all Chief Officers, alongside five direct email/newsletter communications with borough officers.

Consideration of the issues raised by respondents, and recommendations made in response, were done with the objectives and requirements of the LLAQM in mind, but also in recognition of London's toxic air as being a shared challenge to address.

Copies of all responses have been made available to the Mayor alongside this report.

MAYOR OF LONDON

Annex: Consultation respondents

Category	Name/ Organisation
Private individuals	Hannah Smith
	Barbara Wheeler-Early
London boroughs	London Borough of Barnet
	London Borough of Brent
	London Borough of Camden
	City of London
	Royal Borough of Greenwich
	London Borough of Hackney
	London Borough of Havering
	London Borough of Hounslow
	London Borough of Islington
	Royal Borough of Kingston
	London Borough of Lambeth
	London Borough of Lewisham
	London Borough of Southwark
	London Borough of Sutton
	London Borough of Tower Hamlets
	Westminster City Council