

MAYOR OF LONDON

**LONDON LOCAL AIR QUALITY
MANAGEMENT (LLAQM)**

Public Consultation Report

12th January 2016

1. Introduction

This document summarises responses to the Mayor's consultation on his proposals for a new London Local Air Quality Management system.

The consultation was open for 10 weeks and closed on the 25th September.

There were 36 responses to the consultation, although six of these were partial responses with only one or two questions answered, and/or did not include details of the respondent.

Organisations that responded included The Environment Agency, Public Health England, London Councils, the London Assembly and 22 London boroughs.

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. For more detail on the final proposals, please refer to the draft LLAQM Policy and Technical Guidance.

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

There was universal support for this and no significant objections or comments.

GLA Response: This proposal will be taken forward. The requirements will be in line with Defra's national proposals.

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

This was generally widely supported in principle. There was recognition that the new bespoke borough LLAQM LAEI modelling packages will help to support understanding of PM_{2.5}

However, a number of respondents raised the following points:

- Local authorities have limited influence on local PM_{2.5}
- Local authorities have limited resources so would be unlikely to be able to take on any additional burdens, and the Impact Assessment did not calculate the impact of this.
- There is limited monitoring data on PM_{2.5} and monitoring equipment is prohibitively expensive; there was some concern both about measuring the effectiveness of any action and also any implication that boroughs will be expected to fund PM_{2.5} monitoring.
- A number of respondents were keen to see exactly how this requirement would be phrased and what supporting information, analysis and examples of specific action boroughs can take will be provided within the LLAQM Technical Guidance. It was also suggested that the Guidance should link to the Public Health Outcomes Framework.
- There were several requests for funding for PM_{2.5} monitoring.

GLA Response: The GLA would like to reassure boroughs that it is not the intention to provide any additional burdens. There will be no requirements for specific action or monitoring, and, although modelling is imperfect, we will endeavor to support boroughs as much as possible through the provision of the modeling and data provided in the new bespoke borough packages from the LAEI. All PM_{2.5} modelling will be available for 2013 and 2020 in the borough package. The full 2025 and 2030 modelling will be available within the London-wide data set which boroughs will be able to download.

We appreciate that in many boroughs there is unlikely to be additional funding or resource available to address PM_{2.5}. The intention of this proposal is to provide recognition of air quality work at the borough level which impacts on PM_{2.5}, and to provide a statutory avenue for boroughs to focus on this where they have specific concerns about PM_{2.5}. During the LLAQM pre-consultation with boroughs, there was some concern raised by air quality officers that as PM₁₀ objectives are being met, work on particulate matter would slip off the agenda. This new role is to provide an additional lever to help address that, and a mechanism for further focus on this pollutant in future, should this be required.

Within the LLAQM Policy and Technical guidance, linkages with the Public Health Outcomes Framework (PHOF) have been made, along with further guidance on measures to target PM_{2.5}.

- There was concern that PM_{2.5} and PM in general is ignored in Planning because only objectives and limit values are considered. The PM_{2.5} exposure reduction target is ignored; emissions data from combustion plant is not routinely provided by manufacturers; and where modelling indicates apparently almost no impact. These factors make it difficult to pursue a low emissions strategy with developers

GLA response: it is difficult to put in place any regional or national planning policy that does not link to the limit values. However, if boroughs were to choose to put in place their own local PM_{2.5} reduction target (see the LLAQM Policy and Technical Guidance for this non-mandatory option which boroughs may wish to consider as part of their new PM_{2.5} role) they may be able to embed this within local planning policy.

The London Plan is being reviewed in 2016 and the GLA will consider what if any additional regional policy support might be able to be provided within this.

c. Streamlining of reports

There was widespread support for streamlining of the reporting process. There were several comments stating that the new reports were clear and useful. However, two respondents refuted the suggestion that there would be any quantifiable resource-saving from this.

There was strong support for the proposal to introduce the public-facing Annual Status Summary Report (ASSR), and no objections.

- 75% of respondents felt that the ASSR should be mandatory. Several suggested that it should be flexible in format to allow boroughs to add more information if they wish.

GLA response: The public facing summary will be expected. This is also in line with Defra's national proposals. The format is flexible; boroughs can add more information as they wish.

There were a number of specific additional comments about the templates, namely:

ASRs

- TfL (and the Mayor) should provide annual air quality updates for inclusion within ASRs, and this should include both London-wide progress and specific details on local action they have delivered within the borough, especially on the TLRN.

GLA response: The GLA and TfL will provide a brief annual update for boroughs on London-wide air quality action and progress, boroughs may insert this into their ASRs if they wish. However, these reports only request the minimum level of reporting necessary; they are almost exclusively tables, with minimal narrative. Narrative on what the GLA is doing may sit uneasily within this, so it would be a decision for the individual borough as to whether they wanted to

include this information within the ASR, the ASSR or neither; this will be down to the individual borough's discretion.

If there are specific local questions that boroughs want responses to they can approach the relevant contact at TfL or the GLA about this at any time.

- *Section 1:* It is stated that the data submitted should be ratified; however, the timing of the report is such that the most recent set of data may not be ratified.

GLA response: If fully ratified data is not available then the latest available data should be used, as per the current LAQM progress reports. However, boroughs are encouraged to ensure that their service level agreements with their monitoring service provider include a KPI that data should be ratified within three months of year end. The GLA is currently developing some guidance and standard clauses for boroughs to assist them with this and other elements of monitoring service procurement.

- *Section 3:* With regard to the final column of the Action Plan table, it is not clear why replicability and partnership working are stated to be required over other considerations. It would be simpler if the final column just asked for 'further information' (with examples of possible information to include e.g. those stated and the funding stream).

GLA response: we will adjust accordingly.

- It was suggested that it should include a section for reporting on industrial sources and new or significantly changed sources.

GLA response: the Planning section will include data on new CHP and biomass, but we will include an additional section for other sources.

- Table K lists progress on actions. We would suggest that this table is limited to actions that are in the process of being progressed, with any future actions or actions that have been complete being listed within further tables in the Appendix.

GLA response: that was our intention; we will make sure the instructions within the template makes this clear.

- We suggest that authorities are required to report on selected key matrix actions within ASRs, whether or not these are actions within an AQAP, and that the outputs of this work are used to provide London wide information on what is being achieved across London Borough's for key actions.

GLA response: none of the actions are mandatory, but the support for this stronger approach is noted.

- We suggest that a section and/or Appendix is included within the ASR to identify existing Local Focus Areas along with a report of actions completed within each GLA and local air quality focus area during the relevant year.

GLA response: This is a useful suggestion, however, considering focus areas is part of the new action planning process, so if boroughs have included focus area actions this will be reflected in their AQAP progress report within the ASR.

- Action completed should be greyed out and not deleted to demonstrate record of achieving something

GLA response: we will look into incorporating this suggestion with the ASR.

ASSR

- In terms of the public facing summary the general format seems good but we would recommend the inclusion of a PM_{2.5} box in the introduction if this pollutant is to be included in the wider work.

GLA response: this is a sensible suggestion but as London has very limited PM_{2.5} monitoring this was not included, but this certainly an option for boroughs who wish to include this information – they could utilise the LAEI maps if desired.

- We would suggest that the public facing summary is included as an Executive Summary of the ASR.

GLA response: it is intended as a stand-alone document for a different audience, but could also double as an exec summary. Boroughs are free to use it flexibly.

- A simple improvement could be made to the mapping by giving > 60 µg/m³ NO₂ a different coloured symbol. The significance of this threshold should also be included as a footnote to the map.

GLA response: we will aim to incorporate this suggestion when we do this mapping for boroughs in 2016.

- We would also suggest that boroughs include more than two achievements and priorities where appropriate.

GLA response: we will make it clear that two is the minimum but more can be added at the borough's discretion.

d. Air Quality Management Areas (AQMAs)

All but two respondents supported the proposed changes to the way AQMAs are re-assessed. Several provided additional comments in support of the proposal and for the qualification that no work on this is required if there is no significant change concentrations evidenced by the monitoring data. Support was again expressed by a number of respondents for the promise to provide bespoke borough-level modelling. The two respondents who did not support this proposal were neutral rather than opposed.

A number of additional points/requests were made:

- Concern about what this may mean in future if monitoring reduces, because modelling data is inexact

GLA response: we agree with this concern, and it is very important that monitoring is maintained. However, a reduction in monitoring would mean more reliance on modelling even if this new system for re-assessing AQMAs were not in place.

- Concern about the usability of LAEI data (files are too large, officers have not received training).
- A request for information on the meta-data and methodology behind the modelling

GLA response: this should be addressed via the new LLAQM LAEI bespoke borough modelling packages, and we will also provide an LAEI workshop including information on methodology and

modelling in spring 2016. Methodology is always provided for the LAEI and we be provided again for the 2013 LAEI (along with a workshop to help answer any questions).

- Two respondents raised concerns that this was an additional burden

GLA response: this replaces the requirement for detailed USAs, and all the modelling will be provided for boroughs to enable this. The first year for boroughs to assess their AQMAs in this way will be 2020, this has been enshrined within the LLAQM Policy Guidance.

- A request that all boroughs review AQMAs at the same time

GLA response: that is the intention behind this – all boroughs will reassess on a 4-yearly cycle, the first year being 2020.

- One respondent raised a point about timing: that the LAEI information would need to be provided in ample time before the ASR was due.

GLA response: if the LAEI information is delayed the deadline for ASRs will be postponed to allow boroughs sufficient time.

- Concern from one that this would be a “tick box” and that AQMAs should be more focused on problem areas.

GLA response: we were attempting to find a low-resource solution. The renewed and revised attention on focus areas should help to address problem areas.

- A desire to see details of this proposal in the Technical Guidance (TG), especially regarding what constitutes a “significant” change which would constitute the need to look at the mapping, and details on how to utilise the mapping efficiently.

GLA response: the draft TG is provided alongside this document, in order for boroughs to be able to comment on the detail of the proposal.

e. Considering and reporting on air quality focus areas

There was general support for this proposal, with just four neutrals. There were some caveats/points made, as follows:

- Current focus areas tend to be in areas where boroughs have little control (on the TLRN) and so are not very useful for action planning. Boroughs would like to be involved in any reassessment of focus areas.
- There should be no distinction between GLA and local focus areas
- Only a small number of boroughs had areas that they wanted to identify as focus areas, most did not yet know.

GLA response: the GLA and TfL plan to fully involve boroughs in a reassessment of the focus areas during 2016. Through this process we will work with boroughs to see if any additional focus areas should be identified. We will also decide on how they are designated but the intention is that there will be no distinction between GLA and borough focus areas, as all will be identified collaboratively.

- The EA would need to be fully involved and consulted on any focus areas relating to their sites.

GLA response: we will ensure that this happens. Highways England will also be consulted on any focus areas on motor ways.

- Knowledge of which areas have particularly high pollution is certainly relevant when action planning. Focused action is likely to be more effective, but whether action should be focused geographically or in some other way may vary from case to case. As well as meeting limit values, it is important also to consider that the health effects of air pollution have been found to vary in line with the concentrations that people are exposed to, so there may be greater health benefit from reducing concentrations across a wide area of high human exposure, than from reducing them in a hotspot of high concentration.

GLA response: we agree that focus areas is just one strand of work and should not be to the detriment of other borough-wide or intra-borough action.

f. Action Planning

There was strong support for the provision of the AQAP and Action Matrix. Numerous respondents felt that they would be great help when revising AQAPs. One respondent felt that it was not appropriate for this to be provided at the regional level, and that the Matrix and AQAP template should only be provided nationally; this was linked to a wider question as to whether the Mayor should be managing LAQM in London, which was raised repeatedly by one respondent.

The following specific suggestions emerged in the comments:

- These should be able to be used flexibly.

GLA response: this is the intention; the Matrix is only intended to be a guide; an initial filter of the options to avoid this work being duplicated across boroughs, not a rigid plan, as all borough circumstances and resources are different.

- Three respondents queried the priority rating in the Matrix.

GLA response: as stated in the Matrix, the priority ratings are a guide only, based on the available information. The relative priority ratings will naturally differ somewhat from borough to borough, and boroughs are free to make their own assessments.

- It should be made very clear that no actions are obligatory; also, boroughs should avoid delivering the lower priority actions which will have minimal impact on air pollution (especially if this is at the expense of the high priority actions).

GLA response: we will aim to ensure that the non-obligatory nature of the actions is as clear as possible within the Technical Guidance. Boroughs are free to select the actions of their choosing, or develop their own actions. However, we agree that a focus on those actions which are known or likely to have the highest impact is to be strongly encouraged.

- One respondent was very concerned that the Action Matrix were mandatory and/or that reporting on the actions suggested in the Action Matrix themselves (as opposed to reporting on the Air Quality Action Plan achievements) would be required annually in ASRs.

GLA response: the actions are not mandatory, and this will be clear in both the Policy and Technical Guidance.

When reviewing their AQAP every 5 years, boroughs simply have to demonstrate that they have considered all the actions and that is why we have included the short table within the AQAP template wherein boroughs briefly outline why non-selected measures were discounted.

Boroughs are not expected to report annually on the Action Matrix within the ASR, they are only asked to report on the actions within their own AQAPs.

- There were three concerns raised about the 5 year cycle for AQAPs and whether something so rigid was appropriate.

GLA response: this will be an expectation, in order to keep the document relevant and current. Tools have been provided to ensure this process is less arduous.

- AQAPs should be updated every 4 years in line with AQMA reviews.

GLA response: during the pre-consultation many boroughs felt 4 years was too short, and there was no way to bring all AQAPs into the same 4 year schedule without forcing a large number of boroughs to review their plans after just 1 or 2 years, which was viewed as an unfair and unnecessary burden.

- Concern is highlighted as to how a 5 year review would work when new regional or national strategies are published - for example, if an AQAP has just been reviewed it will be 'out of date' for some 4-5 years.

GLA response: the focus within AQAPs is very much the actions – and these can be added to and updated in an informal and low-resource way annually through the new ASR action planning reports. The narrative sections within AQAPs are less important and will always contain slightly out of date information after a year or two. Boroughs will be free to update these sections if they wish, or to update their AQAPs more regularly than 5 years.

- The Action Matrix should specify the pollutant targeted for each action.

GLA response: this information is provided in the Emissions and Concentrations section.

- The AQAP template is missing sections on Public Health, Energy and Transport. These sections are required to ensure ownership of the Air Quality Action Plan across all relevant service areas.

GLA response: there are actions within the Matrix related to these areas, if boroughs wish to add any additional narrative related to the context and structure within their local authority this is welcomed. The template is flexible.

- The Action Matrix is premature in including the Low Emission Neighbourhoods (Measure 27) as these are currently being piloted this year as part of the Mayor's Air Quality Fund and the effectiveness of these trials are not yet known.

GLA response: none of the actions are prescribed. It is important to include new innovative ideas as well as tried and tested measures.

- It is inappropriate for Boroughs to introduce Local Low Emission Zones (Measure 39) unless there is a commonly agreed framework to work within, so as to avoid confusion amongst drivers travelling through the London road network, and there are provisions in the Traffic Acts and Regulations to enable the introduction of several layers of traffic restrictions in an area.

GLA response: this measure has been removed from the Action Matrix until we have more information on the Defra Cleaner Air Zones framework. TfL are also engaging with boroughs about how we might work together to extend the ULEZ.

- The development and review of actions plans should also include consideration of the extent to which available measures have co-benefits with other environmental and public health goals, such as reducing greenhouse gas emissions or increasing physical activity.

GLA response: agreed, and co-benefits are considered within the Action Matrix.

- Green infrastructure is noted as a potential local action, although within the 'risks' section the potential for emissions of biogenic air pollutants (volatile organic compounds) are not included.

GLA response: These risks are very low and linked to urban canopy issues so highly unlikely to be a risk for green walls or similar, however, the appropriate selection and placing of green infrastructure is key, and the Matrix has been amended to reflect this.

g. Planning and development control

A significant majority of respondents were in support of the proposed requirement to report on Planning. However, more than half of respondents said it would be difficult to get this information and almost all said that they would require a grace period in order to establish systems to gather this information.

GLA response: we will not ask for this information in the 2016 ASR, but will ask for it the following year, once boroughs have had a chance to get these systems in place.

Additional points on this proposal were:

- It should only apply to applications from April 2016 onwards.

GLA response: It will apply to applications from January 2016 onwards. We will open up an individual discussion with any boroughs that will struggle to provide this information in 2017.

- The planning agenda is one of the most important tools to push the air quality agenda and is often neglected with local authorities. *(This response came from a local authority)*

GLA response: we strongly agree and this is the idea behind this requirement; to help get a clearer understanding of local authority air quality Planning work, and to raise the profile of borough's crucial work on this agenda (via TEC, Cleaner Air Borough reporting and other forums).

- A small but significant number of respondents questioned the value of collecting this data, and what it would be used for.

GLA response: as outlined above, the purpose of this is to help understand if there are any major common gaps or discrepancies in borough air quality Planning work, and also to raise the profile of borough's crucial work on this agenda (via TEC, Cleaner Air Borough reporting and other forums).

- The additional reporting on interactions with Planning are welcomed. However, we believe that the number of times recommendations for conditions or refusal are followed by the Planning Authority needs to be incorporated in to the reporting. While we recognize that collating this information may involve more work, we believe that statistics relating to recommendations made and followed through on is a better measure of the success of the air quality planning process.

GLA response: it is clear that this would be the ideal, but unfortunately this is likely to be prohibitively time-consuming for many boroughs at the present time, as they do not collect this information.

- We do not currently record air quality input data, we will need to invest in and implement a suitable system. We would ask the GLA to consider procuring such a system on a pan London level for all boroughs that will capture this information.

GLA response: as all boroughs have different systems this will not be feasible but we are exploring what additional support might be possible, and have deferred the date when this information will be required.

- Greater clarity with regard the information required for each point is also needed e.g. a definition of 'monitoring'.

GLA response: we will look to revise the table accordingly (and it will not be included in the 2016 ASR, in order to provide a year's grace period).

- One respondent raised a general concern about planning and resourcing but as this is not strictly related to LLAQM.
- A request was made for training around planning and NRMM enforcement.

GLA response: LLAQM is only a mechanism to report and recognise work on Planning. The London Plan requirements are independent of the LLAQM framework, however, we are looking into what further support can be provided for boroughs, especially with regards to training.

h. Accountability and Responsibility

There was general agreement with this approach. Several respondents suggested that Heads of Planning should also be involved.

GLA response: we agree that this would be useful but will leave this to the individual borough's discretion.

i. Monitoring

- Approximately half agreed with the proposal that the GLA be consulted on proposals to move or remove monitoring stations, and half disagreed.

GLA response: this proposal will be taken forward so that the GLA can retain strategic oversight of London's monitoring network. Boroughs are expected to contact the GLA air quality team to notify them of any plans to remove, move, or add a new automatic air quality monitor in their borough. This is to enable the GLA to maintain strategic oversight of this crucial network. Boroughs need to send a brief email to GLAAirquality@london.gov.uk detailing the location of the site, pollutants monitored, and a brief summary of reasons for the proposed change.

It is important to note here that current arrangements with Defra with regards to AURN and AURN-affiliated sites will be unaffected under LLAQM, and will remain as they are.

- Almost all respondents (and all local authority respondents) disagreed with the suggestion of mandating that each borough retain 2 automatic monitors at a minimum, although, interestingly, most boroughs also said that this posed no financial implications for them for the next 4-5 years.

GLA response: we will not be taking this suggestion forward at this stage. However, monitoring is crucially important, and it is one of the Cleaner Air Borough criteria, so maintenance of current levels of monitoring will be important for boroughs if they wish to retain their Cleaner Air Borough status.

- Several boroughs requested funding for further monitoring.

GLA response: unfortunately we do not have funding available to support monitoring. To try and assist boroughs with costs, we undertook some analysis to assess whether there were any economies of scale possible through facilitating a joint procurement of monitoring services, but unfortunately, this revealed that the opportunities for savings were very limited. We will however provide boroughs with tendering guidance and standard contract clauses to help ensure that procurement of automatic monitoring services is as effective and cost-efficient as possible.

j. Cleaner Air Borough status

- Most respondents agreed with the inclusion of Cleaner Air Borough (CAB) updates within the ASR

GLA response: this will be retained.

- Most respondents who answered this question said that they would find a CAB logo useful

GLA response: this will be provided.

- Most respondents said a combined air quality progress report to TEC would be welcomed and helpful in raising the profile of air quality. However, a number requested that this would be completed by the GLA and not require any input/additional work from boroughs.

GLA response: the GLA will compile this report by picking out key actions from ASRs. No additional work will be required from boroughs.

- Several respondents suggested that GLA and TfL should also be subject to the Cleaner Air Borough criteria.

GLA response: the Cleaner Air Borough Criteria are specifically tailored to the boroughs. The GLA and TfL are delivering against the Mayor's Air Quality Strategy and Manifesto.

- Several respondents questioned the usefulness of the logo as there is no resident awareness of the scheme, it's hard to see what value it adds, and it's likely to be overlooked.

GLA response: the purpose of the scheme is primarily to raise the profile of borough air quality work amongst councillors and other stakeholders. However, we will explore if there are any additional avenues to raise awareness of the CAB more widely.

- One respondent questioned whether boroughs would be penalised for receiving CAB – whether they would then be forgotten about.

GLA response: quite the opposite; these boroughs will be prioritised for funding and the CAB status will be re-assessed annually.

- One or two asked whether it could be combined with the Action Plan report table.

GLA response: it was felt this would not reduce time required for completion (because if it were combined boroughs would have to classify each measure in the Action Plan table instead),

and the stand-alone table is simple way to highlight and ensure that work is being undertaken against each of the criteria.

- One or two respondents stated that it should not be mandatory to display the logo

GLA response: agreed – it will be entirely at the borough’s discretion.

k. General feedback

- Numerous respondents restated their support for the proposals and the idea of having a coordinated focused LAQM system for London.
- Several respondents questioned the Impact Assessment’s findings that the new system would save any time or resources, and pointed out that there are new requirements on boroughs around NRMM (which is not part of LLAQM, but is a new air quality workstream for boroughs) and also on reporting on Planning.

GLA response: the savings quantified in the Impact Assessment were small; the key aim of the LLAQM is enhanced focus on and coordination of air quality in London.

- Several respondents stated their desire for the ULEZ to be extended into their borough.

GLA response: TfL has set up a working group to explore opportunities for ULEZ expansion with interested boroughs.

- There was a request to strengthen the LIP guidance so that it can be more readily spent on air quality.

GLA response: the guidance was revised in 2015 in order to make this clearer.

- Several boroughs commented on their concern about timings (for ASRs) etc.

GLA response: we will postpone 2016 deadlines for ASRs until July 2016, to ensure that boroughs have the new templates at least 3 months before the deadline. We will provide 8 weeks to comment on the draft Policy and Technical Guidance.

- Several respondents commented on the need to see the Technical Guidance draft before they could fully comment on some elements of the proposals

GLA response: this is understood and time will be built in to incorporate any comments boroughs may have on the draft Technical Guidance document (which will be circulated to boroughs via an informal consultation).

- One borough raised concerns about the lack of clarity between the national and London system and the need for London boroughs to not have any additional reporting over and above those required nationally.

GLA response: The national system will be very similar with regard to reporting. In fact the London ASR requires less narrative input (it is limited to data) than the national ASR

London boroughs will only need to provide additional information on Planning and Cleaner Air Borough status. This reflects the unique situation in London, and also the significant additional financial support provided to London boroughs that is not provided elsewhere (such as via the £20 million Mayor’s Air Quality Fund).

- Several respondents reiterated the point that the Matrix and AQAP should be flexible and for guidance only.

GLA response: This is the intention and we will ensure that the Technical and Policy Guidance makes this clear.

- It is recommended that the wording in Section 2 of the consultation is “softened” so as to make clear that the Mayor will only use his formal reserve powers to make directions to require boroughs to take specific actions to improve air quality as a last resort in situations where there is an overriding need evidenced by robust technical and cost benefit analysis.

GLA response: the Policy Guidance makes this point clear.

- One respondent question the legal basis of the LLAQM.

GLA response: the powers are outlined within Part IV of the Environment Act 1995. Furthermore, in their national LAQM guidance Defra have instructed authorities to follow the London LLAQM Policy and Technical Guidance.

3. Key amends resulting from the consultation

The key amends/points for clarification that will be taken forward as a result of this consultation are:

- PM_{2.5} – clarity about this role is provided within the LLAQM Policy and Technical Guidance, which includes clarity that no additional monitoring or specific actions are required, and also provides additional advice on addressing this pollutant.
- Reports – the public facing ASSR will be expected. The GLA will provide an annual summary of the Mayor’s actions on air quality for boroughs to use in their annual reports if they wish. A number of other small proposed amends to the templates will be incorporated as outlined in section 2, above.
- AQMA reassessment – the proposal will be taken forward as planned. However, the first year for boroughs to reassess will now be 2020. The draft Technical Guidance with the details of this has been circulated to boroughs for comment prior to finalisation.
- Focus areas – how they should be considered during Action Planning is detailed within the Technical Guidance. There will be no obligation to deliver any specific prescribed action in focus areas.
- Action Planning – the Technical and Policy Guidance makes it clear that no Action Matrix actions are obligatory.
- Planning and development control – inclusion of any reporting requirements on this will be deferred until 2017.
- Monitoring – boroughs will be required to advise the GLA of plans to add, remove or move any monitoring stations. This will consist of an email stating the location of the monitor and a brief summary of the reasons for the proposed change. The suggestion to mandate maintenance of 2 monitors will not be taken forward.
- Cleaner Air Boroughs – a logo or marker will be provided for borough’s (voluntary) use.

- Powers of Direction – the Policy Guidance makes it clear that these powers will only be used in exceptional circumstances. The LLAQM is about pulling together to address air quality, it is not a punitive tool.

4. Next Steps

Action	Date
Publish consultation responses	12 January 2016
Informal consultation on draft Technical Guidance and Policy Guidance	Closes 8 th March 2016
Publish final Technical and Policy Guidance and templates, formal start of LLAQM	May 2016
Deadline for ASRs	August 2016 (postponed for first year to allow sufficient time for completion)

ENDs