

Merton Council

Cabinet

15 January 2018

Supplementary agenda 2

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Committee: Cabinet

Date: 15 January 2018

Wards: Merton Park, Ravensbury, St Helier and Canon Hill

Subject: Delivery of the regeneration of Morden town centre

Lead officer: Director for Environment and Regeneration Chris Lee

Lead member: Cabinet Member for Regeneration, Environment and Housing, Councillor Martin Whelton.

Contact officer: Assistant Director - Sustainable Communities, James McGinlay

Reasons for urgency: The Chair has approved the submission of this report as a matter of urgency to ensure that the agreed programme set out in the Memorandum of Understanding between Merton Council and Transport for London can be adhered to. If it is not progressed at this time, there would be delays to the targeted start for the delivery of the scheme and the council would fail to adhere to the timetable set out with TfL and in funding bids to government.

Recommendations:

- A. Approve the recommendation from officers that a joint venture option is the most appropriate delivery vehicle structure for Morden.
 - B. Authorise officers to negotiate a Scheme Delivery Agreement with TfL for an appropriate joint venture structure to deliver the regeneration of Morden town centre.
 - C. Note the Memorandum of Understanding (within exempt Appendix B) between Merton Council and Transport for London, which sets out how the two parties will collaborate on the preparatory works for the procurement of a development partner.
 - D. Note the procurement of a Project Management Consultant to coordinate and advise on the preparatory works for the procurement of a development partner.
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1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. The regeneration of Morden town Centre is a key priority for the council.
- 1.2. The council (LBM) is working with Transport for London (TfL) to secure a development partner to undertake the comprehensive regeneration of the town centre.
- 1.3. The council and TfL have jointly appointed the consultants GL Hearn to provide advice on:
 - Structuring of LBM / TfL partnership
 - Governance and resourcing
 - Appropriate procurement process
 - Due diligence and soft-market testing
 - Land assembly

- 1.4. Following a review of various delivery options and soft marketing testing with potential development partners, GL Hearn recommended that a joint venture structure will be the most suitable for the delivery of the regeneration in Merton and that, in the absence of a suitable procurement framework, an OJEU procurement process would be required. GL Hearn's report is attached as (exempt) Appendix A.
- 1.5. The following steps need to be taken in order to start the procurement process in September 2018:
- LBM and TfL to enter into an agreement, such as a Memorandum of Understanding (MoU) (exempt Appendix B), which sets out how the two parties will collaborate on the preparatory works for the procurement of a development partner and clarifies that both parties agree to equally share the costs of the necessary due diligence work prior to the appointment of a development partner.
 - LBM and TfL to enter into a Scheme Delivery Agreement which will set out the roles and responsibilities of each party during and after the procurement of the development partner; addressing matters such as the type of procurement exercise that is to be entered into; the preferred legal structure of the Morden Town Centre delivery vehicle; the parties' interests and obligations with respect to the vehicle's financial, legal, operational, and governance arrangements and the roles and responsibilities of each party during the planning, construction, and operational phases of the scheme.
 - LBM and TfL to appoint a Project Management Consultant to coordinate and advise on the preparatory works for the procurement of a development partner.
 - LBM and TfL to carry out the necessary due diligence work, with the Project Management Consultant taking the lead to ensure this is completed on time, within the budget and in accordance with the regulations.
- 1.6. The programme shows that over the following 6 - 8 months the necessary due diligence work will be carried out, the procurement documentation will be prepared and the details of the Scheme Delivery Agreement will be finalised, so that the procurement of the development partner can commence in September 2018.

2 DETAILS

Background

- 2.1. The regeneration of Morden Town Centre is a comprehensive regeneration scheme to provide a vibrant new town centre with a significant number of homes across the 8.1ha Morden Housing Zone site, an expanded and improved retail offer, modern business spaces, new and expanded bus infrastructure and a significantly improved public realm for the benefit of existing residents, businesses and commuters.
- 2.2. Until now, the delivery of the scheme was hampered by post-2008 market conditions and the absence of a joined-up approach by the major land owners: TfL and LBM.
- 2.3. Within the Morden Housing Zone there are approximately 350 land interests of which 125 are freeholds. TfL own the freehold ownership of the majority of the land to the north of London Road (the land surrounding Morden Underground Station), which measures approximately 2.5ha and consists of 15 titles. LBM own the freehold ownership of the majority of the land to the south of London Road (within the Abbotsbury Triangles), which measures approximately 1.4ha and consists of 43 titles.
- 2.4. In 2016, LBM and TfL jointly appointed a team of architects, engineers and cost consultants to carry out a detailed feasibility study for the Morden Housing Zone site. They found that a 1,800 to 2,000 housing unit mixed-tenure scheme with new retail facilities and significant transport and public realm upgrades, is feasible and potentially viable. This is consistent with the draft London Plan (policies SD6 - SD10).

Delivery Options

- 2.5. In light of the findings of the feasibility study, LBM and TfL jointly commissioned GL Hearn in July 2017 to advise on partnership structuring, public sector governance and a route-to-market for the regeneration of Morden Town Centre.
- 2.6. As illustrated in the table below GL Hearn established that the two parties share many priorities for the development of the site, which, together with the assessment that the scheme's viability is currently challenging, was considered by GL Hearn to have a considerable bearing on the assessment of the suitability of the various potential delivery structures for the scheme.

| London Borough of Merton | Transport for London |
|---|--|
| High quality scheme | High quality scheme |
| Participation in long-term value creation growth | Creation of long-term revenue stream |
| Creation of revenue stream | High volume of housing |
| Provision of >40% affordable housing | High share of affordable tenure |
| Comprehensive Delivery | Improvements to transport infrastructure |
| Strong collaboration with TfL / GLA | Long-term project involvement |
| Collaborative approach to masterplan with developer | Integrated delivery approach |
| Exemplar for London | Delivery of MTS / Healthy Streets |
| | Excellence in design and sustainability |
| | Economic and social development |

- 2.7. GL Hearn identified 12 potential structures for the venture and analysed the pros and cons of each option. They concluded that a joint venture (JV) structure, with (probably) an associated Competitive Dialogue OJEU procurement process would be the most suitable solution. Furthermore, they recommended that the joint venture should have a 50/50 controlling split between the development partner and one of the public bodies. A Scheme Delivery Agreement would set out the degree of influence and guarantees of outcomes for the passive partner – in their view, LBM.
- 2.8. The details of the pros and cons for each of the options are set out in the report in exempt Appendix A but the main reason(s) for the rejection of the non-JV options can be summarised as follows:
- Option 1 **Do Nothing**: no long-term income / value benefits, no security of delivery or control over comprehensive development.
 - Option 2 **Landowners dispose of freehold**: no long-term income / value benefits, no security of delivery or control over comprehensive development.
 - Option 3 **Comprehensive land sale structure**: no security of delivery or control over comprehensive development.
 - Option 4 **Phased land sale structure**: no security of delivery or control over comprehensive development.
 - Option 5 **Comprehensive Development Agreement**: High upfront costs for Competitive Dialogue OJEU + poor viability, no collaborative masterplanning.
 - Option 6 **Phased Development Agreement**: no security of delivery or control over comprehensive development.

- Option 7 **Overarching Joint Venture (50% Development Partner with active Development Manager role / 50% TfL &-or LBM with passive role + land)**: some potential.
- Option 8 **Overarching Joint Venture (50% Development Partner with active Development Manager role / 50% TfL &-or LBM with passive role + land + funds)**: some potential.
- Option 9 **Overarching Joint Venture (50% Development Partner with passive role / 50% TfL &-or LBM with active Development Manager role)**: insufficient expertise & funding in public bodies to deliver.
- Option 10 **Three way Joint Venture Company**: unattractive to market due to potential for delay in decisions.
- Option 11 **Direct Delivery by TfL & LBM Joint Venture**: insufficient expertise & funding in public bodies to deliver.
- Option 12 **Direct Delivery by TfL or LBM (or relevant vehicle)**: insufficient expertise & funding in public bodies to deliver.
- 2.9. The table in exempt Appendix C provides further analysis of each of the options above, including references to resources, budgets and risks.
- 2.10. Besides substantial land interests, both LBM and TfL also have other influences to bear on the delivery of the scheme. TfL has its transport authority functions and LBM, as the Local Planning Authority, will have control of the strategic 'Local Plan' policies and the assessment of any planning applications. Importantly, LBM also has its discretionary powers for the making of any necessary Compulsory Purchase Orders (CPOs) should they be necessary.
- 2.11. Officers presented the findings of the GL Hearn report to the Sustainable Communities Overview and Scrutiny Panel at their meeting on 2 November 2017. The panel members noted the scale, impact and opportunities of this regeneration scheme and advised that LBM should maintain sufficient control of the project, by means of an active share in the JV.
- 2.12. GL Hearn's reference to market concerns about the perceived inability of councils in general to make timely decisions are noted but can be mitigated through appropriate parameters within a JV business plan, which would limit the council's decision making involvement to certain strategic matters. This could address these concerns about decision making and resourcing, and warrant further exploration.
- 2.13. GL Hearn's recommendation for a JV structure is accepted but LBM and TfL officers will be exploring various JV options over the next 6 - 8 months, ensuring that the Scheme Delivery Agreement between LBM and TfL strikes the right balance between control over the development and exposure to risk for both parties, while still being acceptable to potential development partners.

Soft Market Testing

- 2.14. GL Hearn carried out soft market testing to assess whether there was appetite in the market for a large-scale regeneration scheme in Morden town centre, involving a complex site assembly exercise, and to gauge reaction to the delivery and procurement structures that were considered.
- 2.15. Meetings were held with a range of large scale developers.
- 2.16. The detailed findings of the soft market testing are set out in part 7 of the GL Hearn report (exempt Appendix A) but in summary they found that: *‘Overall, the tone of response across the five meetings gives us a high degree of confidence that there will be strong interest from the key players in the market for this opportunity, provided that the structure and process put in place are considered workable and they can see a clear route through to delivery’*.

Due Diligence and Procurement

- 2.17. GL Hearn has advised that it is likely that the development partner will be charging a development management fee to the JV and that this amount will necessitate the use of OJEU procurement procedures.
- 2.18. Further legal advice is needed on this matter and whether existing procurement frameworks, such as those set up by TfL or the GLA, would be suitable.
- 2.19. As indicated in the MoU, details of the parties’ involvement in the procurement process will be set out in the Scheme Delivery Agreement.
- 2.20. Neither TfL nor LBM currently have the capacity to manage the work needed for the preparation of the necessary due diligence information and procurement documentation. It has therefore been agreed that project management consultants, with a proven track record of delivering complex development procurement projects, be jointly appointed by TfL and LBM.
- 2.21. GL Hearn has provided some advice on likely due diligence works that will be needed prior to the procurement. The scope and depth of due diligence works are largely dependent on the type of procurement process that will be chosen. Further research will therefore be done on the necessity and scope for each piece of work.
- 2.22. LBM and TfL have been successful in receiving joint government funding of £260,000 as part of the One Public Estate (OPE) fund, to cover the costs for the abovementioned Project Management Consultants and any necessary due diligence works. This funding will be received in January 2018 and spent in accordance with the OPE agreement.

Land Assembly

- 2.23. Subject to further legal advice, it is very likely that the council will have to use its discretionary CPO powers under the Town and Country Planning Act to deliver the envisaged comprehensive redevelopment of the town centre.
- 2.24. Leading counsel, Mary Cook QC, has advised that for certainty of CPO success, the forthcoming revised Local Plan should clarify that all the land within the Morden Housing Zone boundary will be part of a comprehensive regeneration scheme and that the council would be willing to use its discretionary CPO powers, if needed.
- 2.25. The GL Hearn report clarifies that such a commitment would provide sufficient comfort to bidding development partners who would (typically) provide protection in terms of risk and financial exposure, by means of a CPO indemnity agreement.
- 2.26. It should be noted that the discretionary nature of LBM's CPO powers provides the council with a substantial amount of control over the delivery of the project: '*Put simply, if the Council does not support the proposed developer it cannot be obligated to raise powers.*' (exempt Appendix A, paragraph 4.49)
- 2.27. GL Hearn have estimated the land assembly costs and these are referenced in the confidential appendix. The Valuation Office Agency has reviewed GL Hearn's Property Cost Estimate and found that the methodology was appropriate and that the findings are reasonable, considering the scope of their brief.
- 2.28. LBM and TfL have assisted the GLA in their bid for government funding as part of the Housing Infrastructure Fund – Forward Funding, to fund all the Morden Housing Zone land assembly costs, the new bus terminus, public realm works (new plaza and cycling infrastructure) and demolition & initial site works. The outcome of this funding bid will be known in 2018.
- 2.29. It is evident that the market is confident the regeneration of Morden town centre would be a viable scheme given that the parties who participated in the soft market testing expressed their '*strong interest*' without having been provided with any of LBM and TfL's viability information.

Memorandum of Understanding

- 2.30. The MoU in exempt Appendix B sets out LBM and TfL's shared vision, principles and objectives for the delivery of the regeneration of Morden town centre. Thereafter it sets out our commitment to collaborate as equal partners on a programme that will progress the scheme to its next major milestone: the formal start of the procedures for the procurement of a development partner by September 2018.
- 2.31. The collaborative works include:
- The procurement of a Project Management Consultant
 - The drafting of a Scheme Delivery Agreement

- The completion of any necessary due diligence work
- 2.32. The MoU commits both parties to appropriately resource the project with personnel and to fund 50% of the costs of the collaborative works set out in the MoU. Both parties will however utilise any external funding, such as the OPE funding (see paragraph 2.22), prior to expending internal funds.
- 2.33. The MoU will be superseded by the Scheme Delivery Agreement and any other necessary agreements when formal procedures for the procurement of a development partner, starts.

3 ALTERNATIVE OPTIONS

- 3.1. In order to progress the next stages of the scheme, the council is required to make an informed decision to approve the recommendation from officers that a joint venture option is the most appropriate delivery vehicle structure for Morden.
- 3.2. Refer to paragraph 2.8 above, (exempt) Appendix C and sections 3 and 4 of the GL Hearn report in (exempt) Appendix A for the various alternative delivery mechanisms.
- 3.3. If LBM choose not to collaborate with TfL on the delivery of the regeneration of Morden town centre, the aims of the Mayor of London's Housing Zone and the council's adopted Local Plan strategy, for comprehensive regeneration of the town centre, would not be delivered.
- 3.4. The property cost estimates for the various plots in the GL Hearn report, illustrate the cost difference for different parts of the site. The delivery of optimal quantum of housing and associated new infrastructure and public realm, relies on the 'marriage value' of the sites to cross fund the development of the most costly parts of the site.
- 3.5. Some development might be possible on the respective TfL and LBM owned sites but it is likely to be at a much reduced scale, substantially reducing the council's ability to deliver its adopted vision for a revitalised town centre with improved public realm and retail offer and to meet its housing target, and it would result in a piecemeal development, not representative of best value across the town centre.
- 3.6. With reference to the assessment in exempt Appendix C, it is clear that a joint venture structure is the most appropriate way of delivering the regeneration of Morden town centre. However, there are many elements that need to be assessed and agreed with TfL before a development partner can be appointed.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. The regeneration of Morden will form part of the council's Local Plan and is therefore included in the numerous public consultation measures that were approved by Cabinet on 16 October 2017. The first consultation stage of the borough-wide Local Plan review is taking place between 31 October 2017 and 8 January 2018, which includes a specific section on Morden.
- 4.2. Previous consultation undertaken, indicates strong local support for the regeneration of Morden and further engagement with land owners, residents, businesses and the wider community will continue to take place throughout the development process.

5 TIMETABLE

- 5.1. The timetable below indicates when the tasks associated with the MoU will be carried out:
 - Jan/Feb 2018 appointment of Project Management consultants
 - Jan - Jun 2018 (6 months) drafting of Scheme Delivery Agreement
 - Jan - Jun 2018 (6 months) due diligence works
 - Jun – Jul 2018 preparation of tender documentation
 - Aug 2018 Members to consider draft agreements and procurement documentation. Reports also to be presented to the Capital Management Board and the Procurement Board.
 - Sep 2018 launch procurement for development partner
 - Summer 2019 Members to consider recommended development partner

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

General

- 6.1. LBM and TfL have been successful in a joint bid for government funding of £260,000 as part of the One Public Estate (OPE) fund for the costs of the Project Management Consultants and the expected due diligence works.
- 6.2. A commitment is set out in the MoU that both parties will appropriately resource the project with personnel and fund 50% of the costs of the necessary due diligence works. Both parties will however utilise any external funding, such as the OPE funding, prior to expending internal funds.
- 6.3. GL Hearn has advised that the scope and depth of due diligence works are largely dependent on the type of procurement process that will be chosen. The procurement process is again, to some extent, dependent on the details of the delivery structure that will be decided as part of the forthcoming negotiations of the Scheme Delivery Agreement. The Project Management Consultant will provide advice on the necessary due diligence works and on the scope for each piece of work required, which will greatly influence the cost for this part of the project.
- 6.4. Under the subheading 'Option Agreement', in paragraphs 4.74 - 4.82 of the GL Hearn report in exempt Appendix A, a number of possible mechanisms

are suggested that would ensure that the JV would get access to the land when necessary and that the council would be able to secure a fair return on its landholdings. These options will be considered as part of the Scheme Delivery Agreement.

- 6.5. The Housing Infrastructure Fund bid, which will address the estimated land assembly costs, the costs of some major infrastructure items and the costs of the site preparation works, would de-risk the project and enhance its attractiveness to the market. If the bid is unsuccessful, these costs would mainly be borne by the development partner and recovered through increased development value. Any CPO costs could be funded by a JV development partner up front and recovered in a similar way over a phased development.

Capital

- 6.6. The approved capital programme contains £5million to provide match funding for Merton’s contribution as shown in the table below. This funding will match TfL’s contribution for major scheme works in Morden.

| Financial Year | 2018/19 £000s | 2019/20 £000s | 2020/21 £000s |
|-----------------------------|------------------|------------------|------------------|
| Transportation Enhancements | 1,000 | 3,000 | 1,000 |

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. At this stage, the council is not required to enter into any legally binding agreements. The MoU in exempt Appendix B sets out LBM and TfL’s shared vision, principles and objectives for the delivery of the regeneration of Morden town centre, and our shared commitment to meet the costs of the preparatory works as equal partners. However, once the Scheme Delivery Agreement has been negotiated, it will provide a formal legal agreement between the council and TfL on the preferred legal structure of the scheme, the roles and responsibilities of the parties and further details on the way forward.
- 7.2. The South London Legal Partnership have been advising officers on the content of the MoU and they will continue to provide legal advice with regards to the Scheme Delivery Agreement negotiations and on matters relating to the (likely OJEU) procurement procedures.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. The regeneration of Morden will form part of the council’s Local Plan, which contains planning policies to improve community cohesion and are subject to Sustainability Appraisal / Strategic Environmental Assessments and Equalities Impact Assessments.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. The regeneration of Morden will form part of the council's Local Plan, which contains planning policies to improve community cohesion and are subject to Sustainability Appraisal / Strategic Environmental Assessments which also consider matters of crime and disorder.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. As set out in the body of this report.

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- 11.1. The following paragraph of Part 4b Section 10 of the constitution applies in respect of information within all the appendices to this report and they are therefore exempt from publication:

Information relating to the financial or business affairs of any particular person (including the Authority holding that information).

- A. GL Hearn report
- B. Memorandum of Understanding
- C. Analysis of Delivery Options

12 BACKGROUND PAPERS

- 12.1. Pollard Thomas Edwards feasibility study (2017)
- 12.2. Merton's adopted Core Planning Strategy (2011)

Appendix A – GL Hearn Report (Commercially Sensitive Information)

Exempt or confidential report

The following paragraph of [Part 4b Section 10 of the constitution](#) applies in respect of information within this appendix and it is therefore exempt from publication:

Information relating to the financial or business affairs of any particular person (including the Authority holding that information).

Members and officers are advised not to disclose the contents of the appendix.

Appendix B – Memorandum of Understanding (Commercially Sensitive Information)

Exempt or confidential report

The following paragraph of [Part 4b Section 10 of the constitution](#) applies in respect of information within this appendix and it is therefore exempt from publication:

Information relating to the financial or business affairs of any particular person (including the Authority holding that information).

Members and officers are advised not to disclose the contents of the appendix.

Appendix C – Analysis of Delivery Options (Commercially Sensitive Information)

Exempt or confidential report

The following paragraph of [Part 4b Section 10 of the constitution](#) applies in respect of information within this appendix and it is therefore exempt from publication:

Information relating to the financial or business affairs of any particular person (including the Authority holding that information).

Members and officers are advised not to disclose the contents of the appendix.

Cabinet Meeting

Date: 15th of January 2018

Wards: All

Subject: Air Quality Action Plan Consultation Response

Lead officer: Chris Lee, Director of Environment & Regeneration

Lead member: Councillor Ross Garrod

Contact officer: Jason Andrews

Reasons for Urgency: The Chair has approved the submission of this report as a matter of urgency because it relates to Merton's statutory duty to produce an Air Quality Action Plan. The plan outlines the actions we will take to improve air quality in the London Borough of Merton between 2018 & 2023. The report was previously considered by members in November 2017 and deferred until 15th January 2018. The report is intended to provide Cabinet with a report of the consultation responses and enable a discussion of action plan priorities for the next 5 years.

Recommendations:

- A. Members to review the public consultation responses to the Councils Draft Air Quality Action Plan 2018 - 2023
 - B. Members to note responses and agree the draft action plan.
 - C. Members to delegate future decisions in respect of the action plan to the Cabinet Member for Street Cleanliness and Parking and the Director of Environment & Regeneration
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1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. Merton has produced and submitted for public consultation an Air Quality Action Plan as part of its duty to the London Local Air Quality Management statutory process, and in recognition of the legal requirement placed on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995.

This plan outlines the action we will take to improve air quality in the London Borough of Merton between 2018 & 2023.

This report is intended to provide Cabinet with a report of the consultation responses and enable a discussion of action plan priorities for the next 5 years.

2 DETAILS

- 2.1. Air pollution is recognised as a major contributor to poor health with more than 40,000 premature deaths attributed to poor air quality across the UK each year, and an associated annual health cost to society estimated to be £15 billion.

- 2.2. Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality monitoring network run by Merton has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations the NO₂ concentration is also in excess of the UK 1-hour air quality objective (60µg/m³) which indicates a risk not only to people living in that area but also for those working or visiting the area.

3 ALTERNATIVE OPTIONS

- 3.1. Re-submit the Air Quality Action Plan for further consultation.
- 3.2. Remove action plan measures
- 3.3. Add further Action Plan measures.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. A 6 week public consultation (Appendix 3) was undertaken. The consultation was part of the statutory process for the implementation of an AQAP and it comprised a number of strands, namely:
- The targeted engagement of partners and statutory bodies with an interest in air quality
 - A borough wide 6 week online publication of the draft plan and accompanying online survey
 - The targeting of some community groups that had engaged us on the subject of air quality.
- 4.2. This resulted in 155 responses and 6 group or organisation responses.

5 TIMETABLE

- 5.1. Phase 1: Adoption of the Plan (priorities and measures) January 2018 and draft and publish the final Air Quality Action Plan in March 2018.

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. The Air Quality Action Plan will require an investment in resources to deliver the plan over the next 5 years, these resources will be dependent upon the final options adopted.
- 6.2. Many of these measures will already be influenced and implemented within the Councils capital and revenue commitments over the next 5 years.
- 6.3. Infrastructure measures are limited to the available grant funding streams.

- 6.4. A small number of measures have a direct consultancy cost and funding will need to be secured internally.
- 6.5. This plan will require a revenue staffing commitment to at least 1 FTE to deliver, coordinate and feedback measures and work with partners to deliver the Plan. Estimated cost is £48,000 (including on costs). This will be funded by revenue generated from the vehicle emissions charge.
- 6.6. Additionally, Merton's Local Implementation Plan funding (LIP) needs to be accessible by the Pollution Team to fund borough specific air quality actions.
- 6.7. Specific Actions to be considered (Appendix 1)

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. The Council has declared the borough as an Air Quality Management Area (AQMA) and as such has a statutory duty to produce and update an Air Quality Action Plan.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. A recent study into poor air quality highlights the fact that inequalities in exposure to air pollution are mainly an urban problem, suggesting that measures to reduce environmental air pollution inequality should focus on cutting vehicle emissions in deprived urban neighbourhoods. Poor air disproportionately impacts on the old, the young and those suffering underlying health conditions.
- 8.2. The Council's new Air Quality Action Plan for 2018-2023 proposes a number of measures aimed at tackling air quality across the borough with a particular focus on hotspots where we know that air quality is at its worst.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. None

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. None

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix 1 – Specific actions to be considered
- Appendix 2 - Air Quality Action Plan 2017-2022 (Draft Consultation)
- Appendix 3 - Air Quality Action Plan Consultation Response

12 BACKGROUND PAPERS

None

Appendix 1 – Specific actions to be considered

| Action ID | Description | Consultation Support | Team Responsible for delivery | Cost | Funded by | Timescale for implementation | Supported and Funded YES/NO | Comments |
|-----------|--|----------------------|-------------------------------|---------|--|------------------------------|-----------------------------|---|
| Action 1 | New SPD for Planning to ensure new developments are as clean as possible | Strongly Supported | EH Pollution | £6K | Already Funded | 2018 | | Document already drafted but need to be embedded in the Local Plan. Also need to be agreed and refined. |
| Action 2 | Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies | Strongly Supported | EH Pollution | £10K | Currently by MAQF | 2017/18 | | This project is currently being delivered by our team for South of London |
| Action 3 | Mapping Focus Areas and Hotspots on the Councils GIS System | Strongly Supported | EH Pollution Planning/IT | £5K | Funded by LIP | 2018 | | Would benefit planning and coordinating developments. |
| Action 4 | Enforcing CHP and biomass air quality policies | Supported | EH Pollution | £6K | Funded by LIP | 2018 | | Additional burden for staffing |
| Action 5 | Enforcing Air Quality Neutral policies | Supported | EH Pollution/Planning | £0 | Already funded | ongoing | | Embedded in the SPD in Action 1 |
| Action 6 | Ensure that Smoke Control Zones fully promoted and enforced | Supported | EH Pollution. | £10K | Funded Jointly in the RSP supported by LIP | ongoing | | Additional burden for staffing |
| Action 7 | Promoting and delivering energy efficiency retrofitting projects in workplaces and homes. | Supported | London Borough of Merton | Unknown | Grant and revenue | ongoing | | Dependent upon grant funding an national objectives |
| Action 8 | Public Health Policy | Strongly Supported | EH Pollution Public Health | £0 | Already Funded | ongoing | | Coordination of Policy to embed AQ and Public Health Initiatives |
| Action 9 | Engage with Head of Transport to identify air quality opportunities and risks related to transport | Strongly Supported | Transport Dept. EH Pollution. | £0 | Already Funded | ongoing | | Coordination of Policy and Traffic Management |

| | | | | | | | | |
|-----------|--|--------------------|--|---------------------|--|----------|--|--|
| | in the borough. | | | | | | | |
| Action 10 | Promotion of Love Clean Air website (south London cluster) | Strongly Supported | EH Pollution | £3-6K | Match funding from member Authorities. | ongoing | | Love clean air site set up by Merton need to be funded for improvements and initiatives |
| Action 11 | Air quality at schools – STARS review | Strongly supported | Transport Team | Unknown | Revenue Staffing | ongoing | | Need to be extended to cover schools in focus areas |
| Action 12 | Update Merton procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation/ EcoStars accreditation scheme. | Supported | Transport Commissioning | £0 | Revenue | 2018 + | | Consider new contracts and procurement and embed AQ specifications. |
| Action 13 | Review procurement contract for outsourced transport services. | Strongly Supported | Transport Commissioning | £0 | Revenue | 2018 + | | As above |
| Action 14 | Detailed assessment of traffic management solutions for GLA Focus Areas and AQ 'hotspots'. | Strongly Supported | EH Pollution Traffic & Highways | £20K per Focus Area | LIP Transport | 2018/22 | | This will be need to be funded as a standalone consultancy role. |
| Action 15 | 'Mini 'Ultra-Low Emission Zone status for Air Quality Focus Areas and pollution 'hotspots' in Merton. | Strongly Supported | EH Pollution/Transport Team | ? | LIP MAQF DEFRA | 2018/ 19 | | This could follow from the above measure and will also be dependent on the Mayors project. |
| Action 16 | School Air Quality 'Audit' | Strongly Supported | EH Pollution | £2K per school | LIP Funded | 2017 | | This should be extended to all schools in focus areas |
| Action 17 | Formalise anti-idling enforcement | Strongly Supported | EH Pollution/Parking Services | £12K | LIP Funding and MAQF | 2018 | | This can be run by Pollution but will have a revenue cost |
| Action 18 | Provision of EV charge infrastructure | Supported | EH Pollution ZipCar flex and Enterprise (formerly City Car Club) | Ongoing | LIP Grant Funding Revenue | 2017/22 | | This can be extended in action 1 and is currently an ongoing project |

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| | | | TfL OLEV | | | | | |
| Action 19 | Emissions based parking levy for residential and business parking permits in Merton. | Supported | EH Pollution | 10K Per review | LIP Funding Revenue Unknown | 2018 &19 | | There is a commitment to review parking in as many ways possible to reduce vehicle use and therefore reduce emissions. To review and assess the present parking surcharge and consider extending the scheme to incorporate all vehicles parked in the borough. |
| Action 20 | Provision of infrastructure to support walking and cycling across the borough | Strongly Supported | LBM – Future Merton TfL | Unknown | LIP Grant Funding Revenue Section 106 | Ongoing | | This is currently underway but need to be publicised in the AQAP |

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London Borough of Merton

Air Quality Action Plan

2017 - 2022



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The Council's Commitment to Air Quality

Air pollution is recognised as a major contributor to poor health with more than 40,000 premature deaths attributed to poor air quality across the UK each year, and an associated annual health cost to society estimated to be £15 billion. Air pollution is associated with a number of adverse health impacts; it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often less affluent.

Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality monitoring network run by Merton has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations the NO₂ concentration is also in excess of the UK 1-hour air quality objective (60µg/m³) which indicates a risk not only to people living in that area but also for those working or visiting the area.

Pollution in Merton comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion comes from outside of London and even the UK. Obviously for these sources the council has limited control; however, local sources are primarily from road transport and from development/buildings.

There are a number of UK and London focused initiatives, both ongoing and planned, which will have an impact on air quality within Merton, but it is clear that local action is also required to ensure that the health and wellbeing of local communities is protected. This Air Quality Action Plan identifies a number of measures through which emissions can be reduced at a local level.

In order to achieve the necessary improvement to air quality, there needs to be a firm commitment and continued cooperation across the relevant departments and services within the council to ensure that actions are implemented effectively and efficiently. We will also continue to work collaboratively with neighbouring authorities, the Greater London Authority and Transport for London in pursuing shared air quality improvement initiatives and responsibilities.

The London Borough of Merton is committed to reducing the exposure of people in Merton to poor air quality in order to improve health. This updated Air Quality Action Plan identifies Merton Council's priorities for tackling air quality over the next 5 years and is supported by the departmental Heads of Service for Environmental Health, Transport, and Planning; the Director of Public Health and Cabinet members.

Foreword: Councillor Ross Garrod, Cabinet Member for Environment



One of the greatest environmental challenges we face is air pollution. On a daily basis we are reminded of the social and economic cost of poor air quality. Almost 10,000 of our fellow Londoners are dying prematurely each year and it is costing the UK economy £54 billion a year. It is all of our duty whether as individuals, local government or national government to do our bit to improve the air that we breathe.

Merton is one of the greenest boroughs in London with over 100 parks and greenspaces but we too have toxic air. As Cabinet Member responsible for Air Quality I am determined to do everything within my power to introduce measures to tackle this issue.

Already as a local authority we are leading the way through the introduction of the Diesel Levy to target the most pollutant vehicles using our roads. We are also providing the facilities such as increased electrical car charging points and cycle pathways to make it easier for people to make the transition to cleaner and greener lifestyles.

The Air Quality Action Plan outlines the steps we as a local authority will be taking to do our bit to tackle this serious issue. But it must be acknowledged that we cannot do it alone and I would welcome ideas from residents, schools and community groups identifying action they can take to compliment the Council's action plan. Together we can help improve the air we breathe.



Air pollution is recognised as a major contributor to poor health with more than 9,000 premature deaths attributed to poor air quality in London every year. Poor air quality does not just have an adverse impact on health but also on the economy and the environment of our city.

We know that the greatest impact of air pollution is felt by the most vulnerable: the young, the elderly and people with heart and respiratory conditions. Furthermore, people living in more deprived areas tend to be exposed to higher concentrations of air pollution, often because their homes or local schools are located near busy roads with higher concentrations of vehicle emissions.

As with other outer-London boroughs, driving still remains the biggest contributor to air pollution in Merton. Other every day activities such as heating our homes are also contributors to air pollution, but we can't just stop these activities overnight as they are an essential part of everyday lives. Therefore we must look at innovative ways that we can take action at a local level to reduce air pollution and minimise the risk to our population.

Public Health Merton works across the council with colleagues in planning, education, leisure and regulatory services to demonstrate the links between health and wellbeing; and how working together we can find better solutions to complex problems like air quality. Merton's new Air Quality Action Plan (AQAP) is a good example of how we seek to ensure that health and wellbeing is embedded into all Merton Council's plans and strategies.

The AQAP sets out a framework to improve the health and wellbeing of local residents, people who work in the borough and those who visit the borough; by way of a number of measures from promoting sustainable travel, providing guidance to developers on the impact of new development on air quality and looking at enforcement measures that could be taken by the council in order to minimise emission from vehicles around key locations such as schools.

We are committed to reducing the exposure of people in Merton to poor air quality, in order to improve health and wellbeing for all of those who live, work or visit the borough.

1. Introduction

This Air Quality Action Plan (AQAP) has been produced as part of our duty to London Local Air Quality Management statutory process and in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995. It outlines the action we will take to improve air quality in the London Borough of Merton between 2017 and 2022 and replaces the previous action plan which ran from 2004 to 2017. Highlights of successful projects delivered through the past action plan are included in Appendix C.

Air quality monitoring and dispersion modelling data which provides information on the nature and extent of the air pollution problem in the borough is presented in Appendices D and E; this includes information supplied from the London Atmospheric Emissions Inventory and includes maps of pollution concentrations for NO₂, PM₁₀ and PM_{2.5} for the borough, together with source apportionment charts which can be used to identify the relative proportions of local emission sources.

This report outlines the actions that Merton Council will deliver for the period 2017-2022 in order to reduce concentrations of pollution, and exposure to pollution, thereby positively impacting on the health and quality of life of residents and visitors to the borough. We recognise that there are a large number of air quality policy areas that are outside of our influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and so we will continue to work with and lobby regional and central government on policies and issues beyond Merton's influence.



2. Merton's Air Quality Priorities

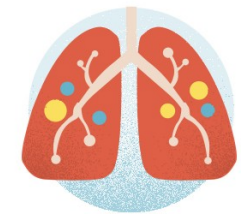
This AQAP is updated in line with new GLA guidance to reflect changes in local air quality management (LAQM) and to ensure that local measures are current, effective and sufficiently targeted to address the GLA air quality focus areas and any other air quality 'hotspots' identified within the borough.

There have been a number of significant air quality actions implemented at both local level and by the Greater London Authority and Transport for London since publication of Merton's first AQAP, including implementation of the Low Emission Zone; the introduction of the Sustainable Design and Construction and Control of Dust and Emissions Supplementary Planning Guidance; highway and public transport improvements and investment in a wide range of sustainable transport initiatives. Many of these are likely to have had an impact on air quality within the borough, however despite these improvements, air quality in Merton remains poor in a number of locations.

The Local Air Quality Management system for London (LLAQM) acknowledges that boroughs cannot solve the problem of air quality alone but that they do have a central role to play in improving air quality through the use of key levers such as parking, planning and local roads together with very specific knowledge of the communities that they serve.

The GLA Technical Guidance (LLAQM.TG16) states that it is important that the updating process focuses on the effective implementation and delivery of measures developed to address the specific local air quality issues, and are part of an integrated package of measures linking with other key policy areas, notably:

- Land-use planning and sustainable development;
- Transport Planning, promoting sustainable transport, local transport management, integration with Local Implementation Plans (LIPs);
- Climate change policies in relation to carbon management and reduction of greenhouse gas emissions;
- Low Emission Strategies providing an integrated approach to promoting emission reduction strategies covering both air quality and climate change;
- Public Health Outcomes (PHO) policy areas, to promote health and wellbeing; and
- Education programmes to promote health and wellbeing and also the principles of sustainability.



The source apportionment data identifies road transport as contributing more than 50% of the overall emissions of NO_x and particulate matter within the borough. The dispersion modelling and Focus Area maps (Appendix D) also identify the areas experiencing the highest concentration of pollutants where there is relevant exposure. In the majority of cases these areas extend along the key transport links where there are high volumes of traffic, both local and through traffic.

One of the key measures to reduce emissions from traffic in the Air Quality Focus Areas and 'hotspots' is the proposed 'Detailed assessment of traffic management solutions' (AP measure 15). This will require a detailed local review of key traffic routes and analysis of traffic data to evaluate the benefit of potential junction improvements, re-routing options, improved signalling, and new parking/ loading restrictions in the boroughs' Air Quality Focus Areas and 'hotspots'. The assessment will use air quality modelling assessment methods to prioritise appropriate traffic management scenarios based on air quality benefit, feasibility and cost-effectiveness in close liaison with the Transport department and TfL.

Merton is limited in how much it can achieve directly in reducing traffic on the TfL red routes through the borough, but there is potential to include AQAP measures to identify and address local causes of congestion and to lobby GLA and TfL to extend the principles of the planned Ultra-Low Emission Zone to the GLA focus areas and local pollution 'hot-spots' within the borough.

The updated AQAP is linked to the Merton Council Sustainable Transport Strategy and Local Implementation Plan (LIP2) which covers the period 2011 – 2031. The plans include measures to improve cycling/walking infrastructure and generate associated promotional events, provide additional electric vehicle charging infrastructure and car club facilities. A number of major projects for delivery through LIP2 include a scheme to re-route heavy goods traffic around South Wimbledon, with additional schemes to smooth traffic flows, improve transport linkages, cycle facilities and pedestrian access planned for Mitcham, Colliers Wood and Morden.

Merton is keen to encourage the uptake of low emission vehicles and will be promoting this through a range of measures including the introduction of an emissions based parking levy for residents living within the borough. The AQAP also explores opportunities to reduce emissions from delivery and service vehicles and to enhance/optimize new and existing electric vehicle charging infrastructure through the Local Implementation Plan and Supplementary Planning Guidance.

It is recognised that the predicted increase in population across London and the requirement for additional housing and infrastructure across the region is likely to have an impact on traffic growth and air quality. To manage and minimise the impact of these changes the updated AQAP includes adoption of Supplementary Planning Guidance to inform developers on the impact of development on air quality, and ensure that approved schemes include effective mitigation and maximise the opportunity to improve infrastructure for sustainable transport.

Merton will also be working in partnership with 14 other boroughs to develop a Non-Road Mobile Machinery (NRMM) 'toolkit' to enable contractors to evaluate and minimise emissions from NRMM sources.

It is also important to build on existing successes generated by the previous AQAP. Emissions from school traffic and the benefits of active travel for school children has been the focus of the existing STARS project and the CleanerAir4Schools project funded through the Mayor's Air Quality Fund. The updated AQAP includes a package of measures designed to continue the work with schools, parents and pupils with the objective of further improving awareness of air quality and optimise parents' and children's desire and opportunity to adopt sustainable travel options.



Key Priorities for the Updated AQAP 2017 - 2022

- Establish and maintain an effective air quality steering group to ensure that the implementation of AQAP measures is coordinated effectively between relevant council services;
- Encourage the uptake of low emission vehicles through the introduction of an emissions-based parking levy for residents living within the borough, and review the effectiveness of the measure over the next two years;
- To identify the key causes of traffic congestion within our Air Quality Focus Areas and pollution 'hotspots' and to determine effective measures for improving traffic flow through those areas using detailed air quality and traffic management modelling tools;
- To evaluate the air quality benefits and feasibility of introducing 'mini' Ultra-Low Emission Zones in the areas of the borough identified as having the poorest air quality;
- To provide guidance to developers on the impact of development on air quality and ensure that approved schemes include effective mitigation and maximise the opportunity to improve infrastructure for sustainable transport options;
- To formalise anti-idling enforcement in order to minimise emission from vehicles around key locations such as schools, taxi-ranks, Air Quality Focus Areas and hotspots;
- To continue to work with schools, parents and students to improve awareness of AQ and to optimise parents' and children's desire and opportunity to adopt sustainable travel options;
- To review Merton's air quality monitoring network to ensure that it effectively identifies areas of poor air quality, and provides accurate data to enable us to evaluate air quality trends and the impact of AQAP measures.



You will see in this report that we have worked hard to engage with stakeholders and communities which can make a difference to air quality in the borough. We would like to thank all those who have worked with us in the past and we look forward to working with you again as well with new partners as we deliver this new action plan over the coming years.

3. Air Quality Action Plan 2017 - 2022

Table 1 shows the London Borough of Merton AQAP. It contains:

- A list of the actions that form part of the plan;
- The responsible individual and departments/organisations who will deliver this action;
- Estimated cost to the council;
- Expected benefit in terms of emissions and concentration reduction;
- The timescale for implementation; and
- How progress will be monitored.

Table 1: Air Quality Action Plan 2017 – 2022

The actions have been grouped into six categories: Emissions from developments and buildings; Public health and awareness raising; Delivery servicing and maintenance; Borough fleet actions; Localised solutions; and Cleaner transport. The actions have been assessed against the possible magnitude of air quality benefits and scored in line with the LLAQM borough air quality action matrix (see key below). The ratings should be regarded as providing an indicative guide only; where an action is to be the subject of detailed evaluation a more accurate quantification of the air quality benefit will be calculated.

Magnitude of Air Quality Benefits

High = 1

Medium = 2

Low = 3

| Action Category | Action ID | Action description | Responsibility | Cost | Magnitude of emissions/ concentration benefit | Timescale for implementation | How implementation will be monitored | Further information |
|---|-----------|--|----------------------|------|--|------------------------------|---|---|
| Emissions from developments and buildings | 1 | Adoption of Merton Air Quality Supplementary Planning Guidance to ensure emissions from new development is minimised and effective mitigation integrated in scheme design. | LBM – Planning Dept. | £6K | 1 (Benefits potentially significant but not quantifiable) | 2018 | - SPG adopted - Number of schemes assessed - Additional infrastructure achieved | Air Quality SPG to require air quality mitigation and community sustainable transport measures to be delivered through planning condition and s.106 planning agreements. |
| Emissions from developments and buildings | 2 | Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies | LBM – EH Dept. | £10K | 1 | 2017/18 | - Study conclusions accepted - Number sites checked - Reduction in emissions NO _x /PM ₁₀ | NRMM emissions study to identify compliant machinery and develop checklist for contractors. |
| Emissions from developments and buildings | 3 | Map Focus Areas & air quality 'hotspots' on planning GIS maps | LBM – Planning Dept. | £5K | 2 (Benefits potentially significant but not quantifiable) | 2017 | - Maps updated - Number of applications within air quality 'layer' identified for assessment | Incorporate air quality 'layer' onto planning mapping system to identify and prioritise areas for planning control linked to air quality SPG. Associated training/guidance package provided to Planning Officers to spot potential development risks to local air quality and identify appropriate mitigation strategies. |
| Emissions from developments and buildings | 4 | Enforcing CHP and biomass air quality policies | LBM – EH Dept. | £6K | 2 (Benefits potentially significant but not quantifiable) | 2018 | - Identify relevant installations and incorporate air quality controls into planning conditions - Enforce relevant planning conditions | Domestic and commercial heating appliances contribute more than 30% of total NO _x emissions in LBM. CHP and Biomass boilers to be evaluated in terms of air quality as well as carbon emissions. |

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| Emissions from developments and buildings | 5 | Enforcing Air Quality Neutral policies | LBM – Planning Dept. EH Dept. | £0 | 2 (Benefits potentially significant but not quantifiable) | ongoing | - Number of assessments received - Number assessments accepted | Enforce Air Quality Neutral requirement through planning condition/enforcement. |
| Emissions from developments and buildings | 6 | Ensure that Smoke Control Zones fully promoted and enforced | LBM – EH Dept. | £10K | 2 | ongoing | - No. incidents detected - No. enforcement notices issued | Restrictions to be publicised via council website and local campaigns to increase awareness of impact of solid fuel/wood burning on AQ and restrict bonfires. |
| Emissions from developments and buildings | 7 | Promoting and delivering energy efficiency retrofitting projects in workplaces and homes. | LBM | Unknown | 1 | ongoing | - Review Climate change strategies and energy efficiency programmes to ensure that air quality pollutants are also adequately controlled | Merton has no housing stock but strategies are in place to promote retrofit programmes to reduce carbon emissions from workplaces and homes through the LB Merton's Climate Change Strategy and Action Plan 2014 – 2017. Future strategies to ensure that air quality emissions are not compromised particularly in areas of poor air quality. |
| Public health and awareness raising | 8 | Public Health Policy | LBM – Public Health Dept. EH Dept. | £0 | n/a (Benefits potentially significant but not quantifiable) | ongoing | - Updated AQAP and ASR to be signed off by Director of Public Health (DPH) - Health & Wellbeing Strategy to include air quality as key theme - Joint Strategic Needs Assessment (JSNA) to be regularly updated on air quality impacts on the population - DPH retained as member of air quality steering group | DPH to be kept fully briefed on air quality status. All AQAP feasibility studies to include assessment of PM _{2.5} emission reduction potential. All adopted AQAP measures to evaluate impact on PHOF indicators and Public Health teams to support engagement with local stakeholders (businesses, schools, community groups and healthcare providers). Include ongoing planned programmes |

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| Public health and awareness raising | 9 | Engage with Head of Transport to identify air quality opportunities and risks related to transport in the borough. | LBM – Transport Dept. EH Dept. | £0 | n/a (Benefits potentially significant but not quantifiable) | ongoing | <ul style="list-style-type: none"> - Provide air quality briefing for dissemination to Transport team - Identify opportunities to integrate AQAP measures into LIP2 and Sustainable Transport Plan - Evaluate risks to transport in all air quality feasibility studies - Engage Head of Transport as key air quality steering group member | Important that AQAP measures are assessed to identify risks and opportunities to transport. Head of Transport support important for implementing local transport management measures and for provision of traffic data and modelling of options. LIP 3 will be produced in 2018 – air quality to be fully integrated as a key factor particularly in relation to AQFAs and 'hotspots'. (See measure 14). - Air quality representatives to be consulted on any transport plans which are likely to have impact on air quality to ensure impacts can be mitigated/minimised. |
| Public health and awareness raising | 10 | Promotion of Love Clean Air website (south London cluster) | LBM – Public Health Dept. EH Dept. | £3K | 3 | ongoing | <ul style="list-style-type: none"> - Regularity of website updates - Number of website 'hits' - Increased feedback on air quality issues. - Positive feedback on user surveys | Optimise website potential by providing regular updates on local air quality initiatives; promote availability of AirText notification service; invite contact from local residents to identify local air quality issues/opportunities; circulate consultations and publicise events. |
| Public health and awareness raising | 11 | Air quality at schools – STARS review | LBM – School Travel Plan Coordinator | Unknown | 2 | ongoing | <ul style="list-style-type: none"> - Increase in modal shift for school transport routes in borough - Reduction in pollutant concentrations | Continue to share knowledge of existing projects in other boroughs which show measurable increase in modal shift in boroughs with participating schools. Update/refresh Merton School Travel Plans/STARS school projects in line with new/proven initiatives. |

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| Delivery servicing and freight | 12 | Update Merton procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation/ EcoStars accreditation scheme. | LBM – Transport Commissioning | £0 | 3 | 2018 | <ul style="list-style-type: none"> - Review procurement policies - Identify scope for updating terms mid contract - Reduction in emissions from council deliveries | New contracts awarded in 2016/17 for majority of Merton services including waste collection/parks etc. Review existing contracts for sustainability criteria and opportunities to update. Review future contracts to incorporate use of any appropriate consolidation facilities and include requirements for preferentially scoring bidders based on their sustainability criteria. |
| Borough fleet actions | 13 | Review procurement contract for outsourced transport services. | LBM – Transport Commissioning | £0 | 3 | 2018 | <ul style="list-style-type: none"> - Review procurement policies from other boroughs to establish best practice - Adopt revised procurement policy incorporating low emission vehicle standards - Evaluate reduction in emissions from vehicles operating under new contract. | Limited number of fleet vehicles operated by Merton. New contracts awarded in 2016/17 for majority of Merton services including waste collection/parks etc. Review future contracts to include updated vehicle emission standards and include requirement to preferentially score bidders based on sustainability criteria. |
| Localised solutions | 14 | Detailed assessment of traffic management solutions for GLA Focus Areas and AQ 'hotspots'. | LBM – Traffic & Highways | £20K per Focus Area | 1 | 2018/ 19 | <ul style="list-style-type: none"> - Review progress of Morden town centre redevelopment plan (LIP2). - Incorporate planned HGV re-routing scheme for South Wimbledon. - Identify potential improvements to bus links/stops/timing specific to AQFAs in conjunction with TfL. - Liaise with local businesses | Undertake detailed local survey of key traffic routes to identify potential junction improvements, re-routing options, improved signalling, and parking/loading restrictions in GLA focus areas and in air quality 'hot-spots'. Make full use of existing traffic data, relevant planning assessment outputs and other local information to identify possible traffic management scenarios to |

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| | | | | | | | <p>within air quality focus areas to implement green travel plans/delivery and servicing plans/delivery re-timing/ improve vehicle emissions.</p> <ul style="list-style-type: none"> - Evaluate outcome of London Borough of Richmond upon Thames delivery re-timing trial and extend if appropriate to include deliveries within Air Quality Focus Areas as part of 'mini- LEZ'/Clean Air Zone project. See measure 15. | <p>improve traffic flow and remove identified points of congestion. Scenarios to be evaluated based on source apportionment data, traffic data and other local knowledge. Detailed AQ dispersion modelling to evaluate AQ impact of measures and local traffic modelling to assess impact on safety/wider highway network. Link with current LIP2 programme and integrate outcomes into LIP 3.</p> |
| Localised solutions | 15 | 'Mini 'Ultra-Low Emission Zone status for Air Quality Focus Areas and pollution 'hotspots' in Merton. | LBM – EH Dept. TfL | Unknown | 1 | 2018/ 19 | <p>The mini-ULEZ could incorporate measures such as:</p> <ul style="list-style-type: none"> - Restricting access to HGVs during peak traffic periods in AQFAs, link to delivery re-timing trial to minimise congestion caused by lorry loading/unloading - GLA/TfL to ensure that zero emission buses only access routes through AQFAs by 2020 - GLA/TfL to ensure that ULEZ standards for taxi's and Private Hire vehicles apply to routes within AQFAs by 2020 - Restrict access to all non-compliant vehicles within AQFA defined on basis of emissions in line with ULEZ - Improve access/ infrastructure for zero | <p>Undertake campaign for GLA/TfL to designate AQ focus areas in Merton as 'mini-ULEZ' or Clean Air Zones (CAZ). ULEZ is predicted to reduce NOx by 51% in central London and by 10% in outer London. Introducing ULEZ-type restrictions to AQFA's on a local scale would fulfil GLA's requirement for boroughs to target measures effectively, would reduce emissions; incentivise uptake of low emission vehicles and encourage more active travel.</p> |

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| | | | | | | | <p>emission vehicles within AQFAs by introducing rapid charge facilities for electric vehicles in suitable locations e.g. public car parks, supermarkets, fuel stations, taxi/private hire ranks etc.</p> <ul style="list-style-type: none"> - Introduce street parking surcharge for diesel vehicles using on-street parking bays in AQFA/mini-ULEZ - Identify opportunities to install green walls/hedges to disrupt dispersion of pollutants in AQFAs | |
| Localised Solutions | 16 | School Air Quality 'Audit' | LBM – EH Dept. GLA | £2K per school | 3 | 2017 | <ul style="list-style-type: none"> - Review outcomes of Mayor's School Air Quality Audits Programme at Merton Abbey and Park Community schools. - Undertake air quality monitoring using diffusion tubes or personal exposure monitoring system - Review feasibility of options to reduce emissions and/or reduce exposure - Implement improvements - Repeat/maintain monitoring to gauge impact on pollution concentrations. | <p>Undertake audit of Merton schools/nursery classes to identify potential measures to reduce school children's exposure to pollution in areas with poor air quality. Health evidence indicates that the health of very young and the elderly can be significantly compromised by exposure to poor air quality. Children attending school located close to busy or congested roads are vulnerable, with school traffic also increasing emissions at peak times. Consider options such as:</p> <ul style="list-style-type: none"> - Moving school entrances/play areas - Enforce no engine idling schemes around schools - Impose changes to local roads to |

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| | | | | | | | | restrict polluting vehicles around schools - Pedestrianisation of roads near school entrances - Introduce green infrastructure around schools to absorb/disrupt pollutant dispersion - Formalise walking buses for large numbers of children, by funding a paid walking bus 'conductor' similar to the school crossing supervisor. |
| Cleaner transport | 17 | Formalise anti- idling enforcement | LBM – EH Dept. Parking Services | £12K | 2 | 2018 | - Identify resources for enforcement of anti-idling regulations. - Identify key areas for enforcement of anti-idling areas - Number of penalty notices issued - Reduction in number of vehicles idling | Focus enforcement on schools, taxi-ranks, air quality focus areas and hotspots. Use parking enforcement officers to enforce anti-idling regulations. Conduct publicity campaign using website, notices, school projects etc. |
| Cleaner transport | 18 | Provision of EV charge infrastructure | LBM – EH Dept. ZipCar flex and Enterprise (formerly City Car Club) TfL OLEV | Ongoing | 2 | 2017/ 18 | - Increase in number of ultra-low emission car club vehicles - Number car club members giving up car ownership - Change in emissions from car club vehicles. - Increase in provision of on-street charge points - Increase in utilisation of EVCPs across borough - Increase in EVs registered in Merton - Increase in number of electric taxis/PH vehicles | Existing programme to provide electric vehicle charge points via LIP2. Additional options for incentivising the uptake of electric vehicles include : - Increased percentage of electric vehicles in car club schemes. Review car club parking provision to align with current charge points or agree provision of new infrastructure with car club operators. - Increase provision of on-street EV |

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| | | | | | | | licenced/operated within borough. | charging facilities in residential areas. Link to diesel parking levy by using revenue to fund on-street charging infrastructure where community make request for specific streets/neighbourhoods. - Evaluate opportunities for electric vehicle charge points (EVCP) at taxi ranks in Merton to encourage use of EV taxis/PH vehicles outside ULEZ. |
| Cleaner transport | 19 | Emissions based parking levy for residential and business parking permits in Merton. | LBM – EH Dept. | £20K | Potentially significant and to be reviewed | 2017 | - Approval of scheme by Council - Reduction in number of permits issued for diesel vehicles - Calculated change in emissions in years 1 & 2 versus modelled predictions. | Merton Emissions Parking Levy report produced 2016. Objective to encourage residents to replace diesel cars with less polluting vehicles by implementing a phased increase in the parking permit surcharge for diesel cars. 5000 residential parking permits issued in Merton are for diesel cars. Modelled emission reductions for levy calculated based on on-road emissions data rather than manufacturers specifications. In years 1 & 2 discount applies for EVs and no surcharge applied to petrol vehicles. Impact of diesel surcharge to be reviewed for a period of 2 years, with introduction of more comprehensive emissions-based parking scheme thereafter. |
| Cleaner transport | 20 | Provision of infrastructure to support walking and cycling across the | LBM – Future Merton TfL | Unknown | 1 | Ongoing | - Finalise detailed design and specification for Wandle trail - Complete proposed traffic management projects to | - Cycle Quietway between Clapham Common & Wimbledon forming the Merton section of the Wandle trail. Funded by TfL |

| | | | | | | | | |
|--|--|---------|--|--|--|--|--|--|
| | | borough | | | | | support walking/cycling infrastructure. - Review potential for implementing Bike share scheme at key locations. | - Safer Routes to Schools: Ongoing traffic management & safety projects funded by TfL and coordinated by Future Merton, the council's regeneration team. |
|--|--|---------|--|--|--|--|--|--|

Appendix A: Response to Consultation

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

| Consultee | Category | Response |
|-------------------------------|------------------------------|---|
| LB Merton AQAP Steering Group | Local authority departments. | <p>Broadly supportive of identified measures. Securing adequate resources identified as a key component for ensuring successful implementation and completion of measures.</p> <p>Opportunity for increased collaborative working between Air Quality team, Planning and Transport identified. Sharing existing information to ensure that air quality impacts are effectively assessed and mitigated/reduced in planning and traffic management schemes.</p> <p>Ongoing initiatives which are effective at reducing emissions from transport and buildings/development incorporated into updated AQAP.</p> |

Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision

| Action category | Action description | Reason action is not being pursued (including Stakeholder views) |
|---|--|--|
| Emissions from developments and buildings | No air quality actions within this theme discounted. | |
| Public health and awareness raising | No air quality actions within this theme discounted. | |
| Delivery servicing and freight | No air quality actions within this theme discounted. | |
| Borough fleet actions | Join the Fleet Operator Recognition Scheme (FORS) for the borough's own fleet. Increase number of alternatively fuelled vehicles in boroughs fleet. Accelerate uptake of Euro VI vehicles in boroughs fleet. Smarter driving training for boroughs fleet drivers. | Not being pursued as services involving vehicle fleet have been contracted out. Focus instead on future procurement policies. See above. See above See above |
| Localised solutions | Green Infrastructure | Action not identified as stand-alone measure but incorporated into wider schemes focussing on AQ Focus Areas and schools where green infrastructure would be beneficial and practical. |

| | | |
|-------------------|---|---|
| | Low Emission Neighbourhoods | Action not identified as stand-alone measure but some principles incorporated into two other measures; 14 & 15 which propose to tackle local air pollution hotspots using a package of targeted measures. Previous project based on LEN principles at Willow Lane Industrial Estate funded by MAQF but no new funding identified. |
| Cleaner transport | <p>Very Important Pedestrian Days (e.g. no vehicles on certain roads on a Sunday) and similar initiatives</p> <p>Speed control measures e.g. lowering the legal speed limit to 20mph in built up residential areas</p> <p>Free or discounted parking charges at existing parking meters for zero emission cars.</p> | <p>Not supported by Scrutiny Committee</p> <p>A number of 20mph speed limits and 20mph zones have been introduced in Merton. Air quality benefits have not been assessed or established. No plans to extend scheme.</p> <p>Incorporated as potential option for 'mini-ULEZ'/CAZ. See measure 15.</p> |

Appendix C

Successful projects delivered through Action Plan 2004 -2017:

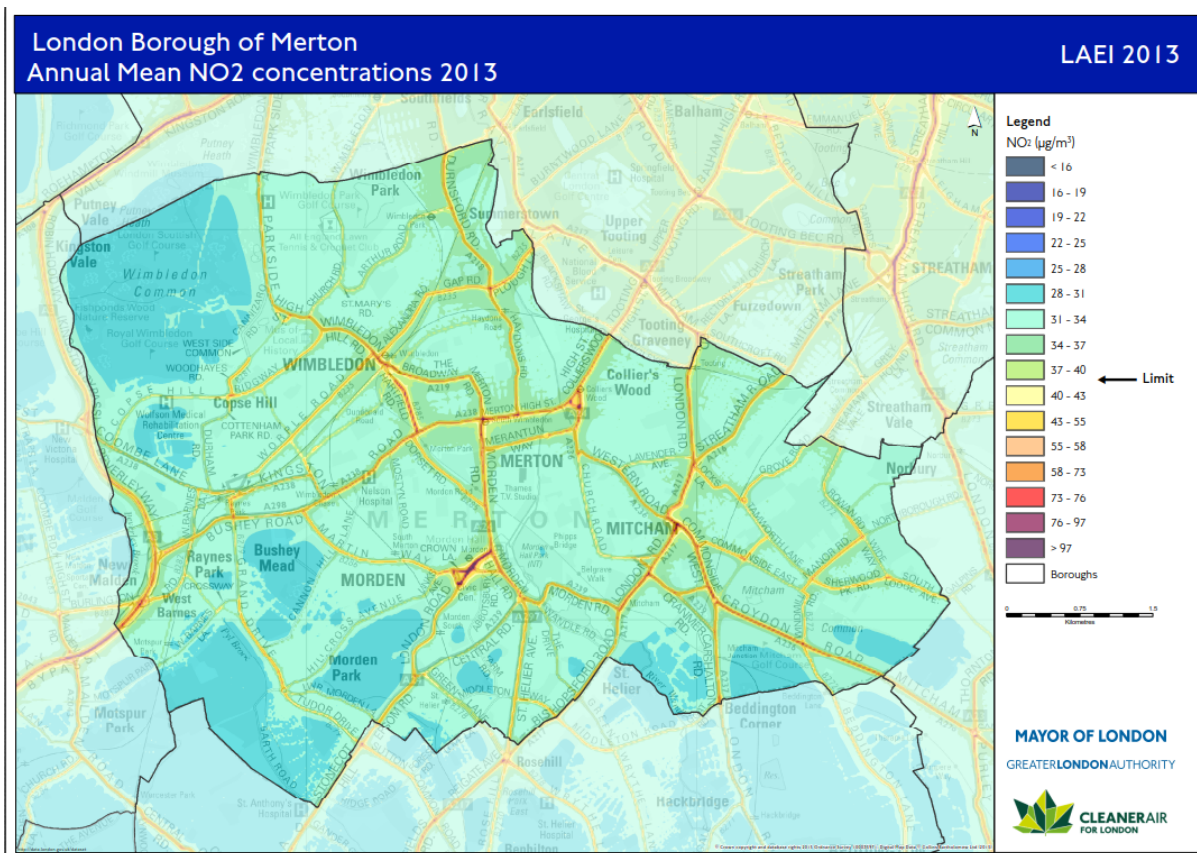
- Introduction of car clubs across borough currently operated by Zipcar and City Car Club (Action No 8)
- Introduction of Controlled Parking Zones including 4 new zones and 73 waiting and loading reviews in 2015/16 (Action No 10)
- Signed up to Walkit.com walking strategy in 2010 (Action No 15)
- Implemented Safer Routes to School/Walking Bus scheme via School Travel Plans (Action No 16)
- Implementation of London Cycle Network (Action No 17)
- Provision of 90 on-street cycle parking facilities via Local Implementation Plan
- Participated in CleanerAir4Schools – joint project between Croydon, Merton, Richmond and Wandsworth including 'walk once a week campaign', School Travel Plan champions training events held in three schools in each borough(Mayor's Air Quality Fund project 2015 - 2017)
- Provision of electric vehicle charging infrastructure including 21 new charge points installed in 9 locations across the borough during 2016.
- AQ project at Willow Lane Industrial Estate, Mitcham. Funded through Mayors Air Quality Fund (2013 -16). Project increased green infrastructure through planting schemes; enhanced road/gully cleansing to reduce re-suspension of dust; delivered sustainable travel training & support and raised awareness of air quality to approximately 150 local businesses.

Appendix D: Summary of current air quality in Merton

The UK Air Quality Strategy (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.

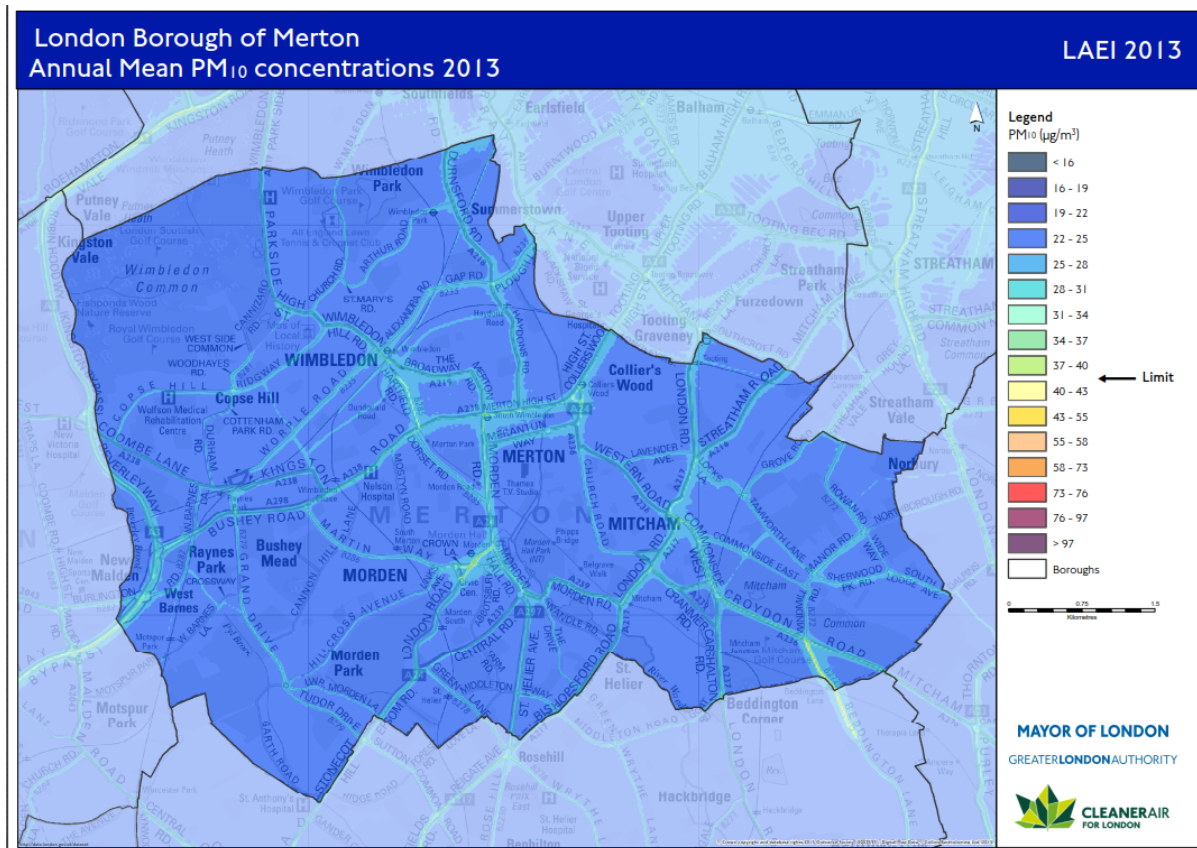
Merton borough is meeting the national AQS objectives for all pollutants other than for Nitrogen Dioxide (NO₂). Based on limited monitoring data Merton is also meeting the current objectives for Particulate Matter (PM₁₀ and PM_{2.5}), however pollutant dispersion modelling indicates that levels of PM₁₀ are likely to be exceeding the annual mean objective at specific locations and as both PM₁₀ and PM_{2.5} are damaging to health at any level, this remains a pollutant of concern.

Figure 1: Modelled map of annual mean NO₂ concentrations (from the LAEI 2013)



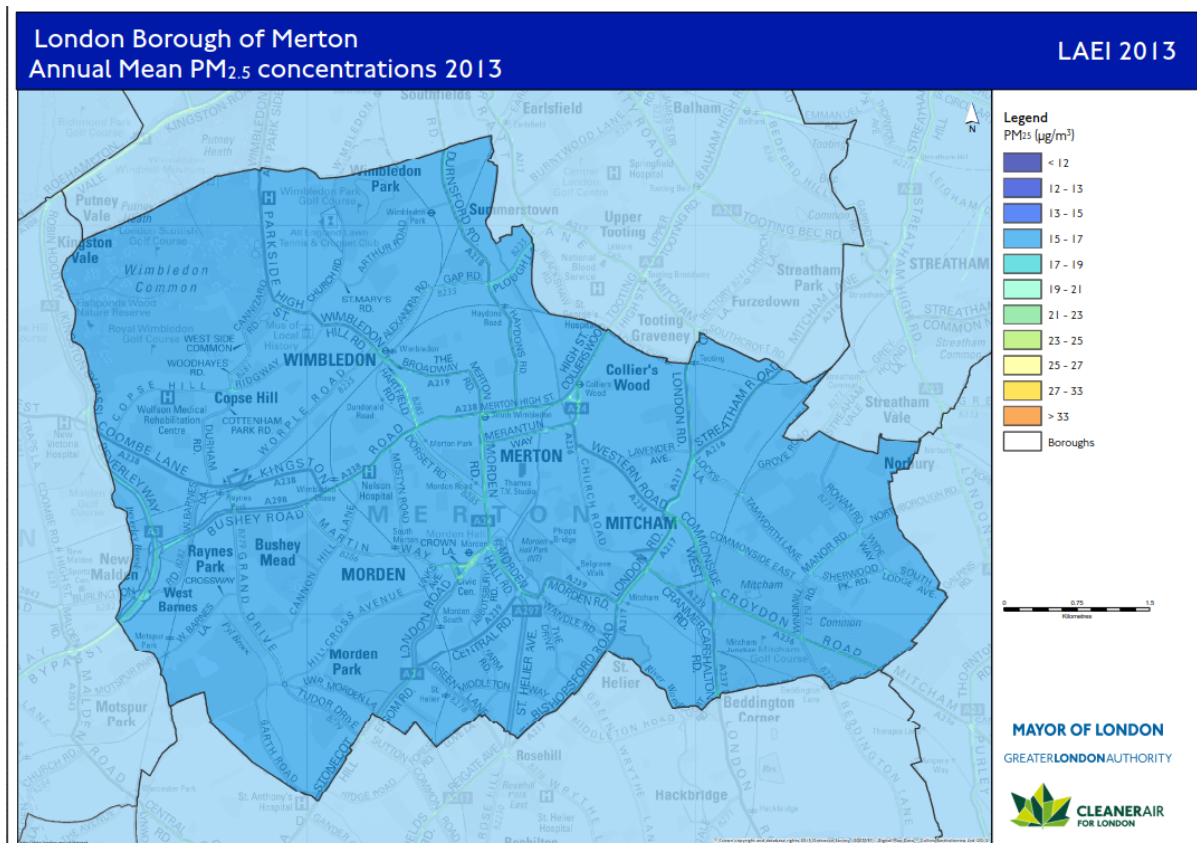
The modelled NO₂ concentrations clearly identify the contribution of road traffic emissions with exceedance of the NO₂ annual mean objective closely correlated with the main transit routes and busy junctions within the borough.

Figure 2: Modelled map of annual mean PM₁₀ (from the LAEI 2013)



Exceedance of the PM₁₀ annual mean objective also extends along the main transport links. The main areas of concern are in the centre of Morden and a section of the B272 Beddington Lane in the south east corner of the borough.

Figure 3: Modelled map of annual mean PM_{2.5} (from the LAEI 2013)



PM_{2.5} concentrations are not currently monitored in Merton but the dispersion model identifies elevated concentrations along the main transit routes and in the town centres within the borough, as would be expected. There is no regulatory standard applicable to English local authorities in respect of PM_{2.5} however, the EU Ambient Air Quality Directive (2008/50/EC) does set out air quality standards including an exposure reduction obligation, a target value and a limit value (25µg/m³ by 2020). The GLA has introduced a 'PM_{2.5} borough role' for air quality teams to consider how existing and new priority actions can help reduce PM_{2.5} levels in their area, and to work collaboratively to align any new measures with the objectives of the borough Public Health team.

Public Health Outcomes Framework

The current Public Health Outcomes Framework (PHOF), produced by Public Health England, provides an indication of differences in life expectancy and healthy life expectancy between communities. The fraction of mortality attributable to particulate air pollution (Indicator 3.01) for Merton borough is as follows:

| Region/community | Particulate air pollution (Indicator 3.01)(Feb 2017) |
|--------------------------|--|
| London Borough of Merton | 5.3 |
| London Region | 5.6 |
| England | 4.7 |

Source: Public Health Outcomes Framework – Public Health England (website accessed March 2017)

The PHOF data indicates that the fraction of mortality attributable to particulate air pollution is slightly below the average value for the London region but is higher than the average for England.

For other pollutants Nitrogen Dioxide (NO₂) concentrations remain in excess of the UK Air Quality Objectives at a number of locations across the borough. Monitoring during 2015 indicated that the annual mean NO₂ objective of 40µg/m³ was exceeded at several locations including Colliers Wood, Morden, Tooting and South Wimbledon. At monitoring sites in Tooting and High Street, Merton the NO₂ concentration was measured in excess of 60µg/m³ which is indicative of an exceedance of the 1-hour Air Quality Objective. This short term objective represents a risk to individuals spending as little as an hour in the area of exceedance and is therefore significant not just for people living in that area but also for those working or visiting the area.

AQMAs and Focus Areas

In Merton an Air Quality Management Area (AQMA) has been declared for the whole borough.

The AQMA has been declared for the following pollutant/s:

- Nitrogen Dioxide - we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations. We may also be breaching the UK 1-hour Air Quality Objective based on measured concentration for NO₂ being in excess of 60µg/m³ at some locations within the borough.
- Particulate Matter (PM₁₀) – whilst monitoring data from the automatic monitoring station at South Wimbledon indicates we are complying with the UK Objectives and EU Limits, the wider modelling data indicates that we are likely to be breaching the 24-hour and annual mean PM₁₀ Objectives at a number of locations across the borough. We are also exceeding World Health Organisation air

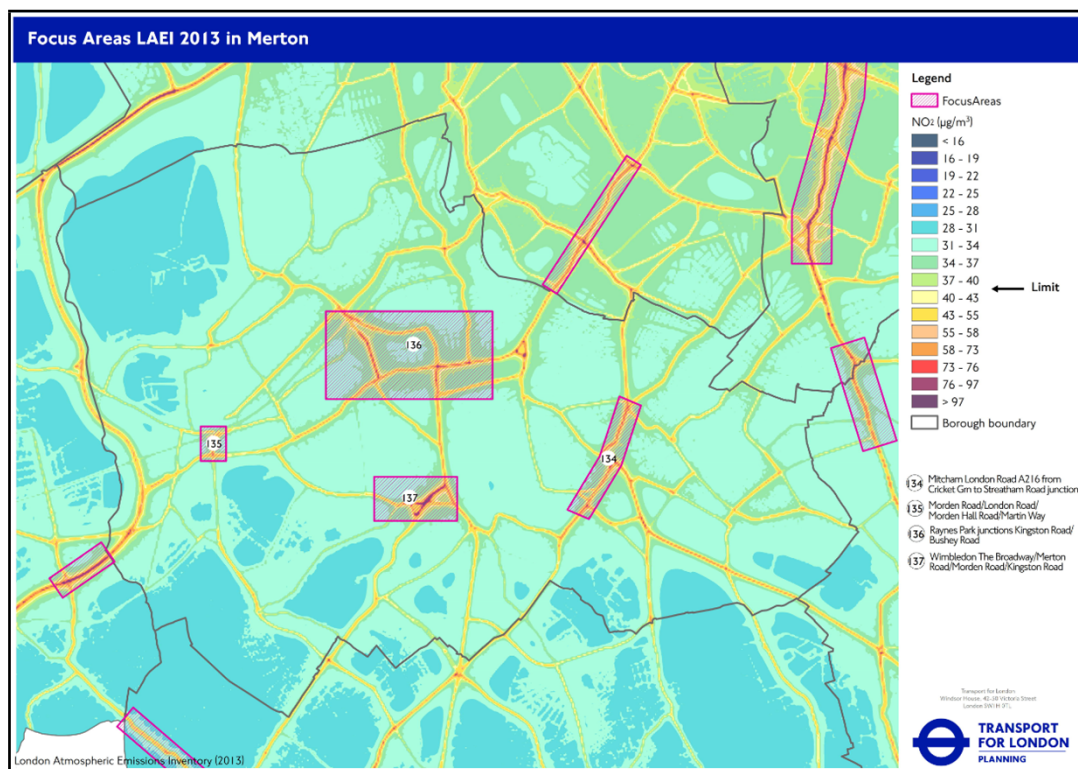
quality guideline for this pollutant, and we have a formal responsibility to work towards reductions of PM_{2.5}.

An Air Quality Focus Area is a location that has been identified as having high levels of pollution and human exposure. There are four focus areas in the borough. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.

Figure 4: London Borough of Merton GLA Focus Areas (2013)

| Focus Area Ref. | Location |
|-----------------|--|
| Focus Area 134 | Mitcham - London Road A216 from Cricket Green to Streatham Road junction |
| Focus Area 135 | Morden - Morden Road/London Road/Morden Hall Road/Martin Way |
| Focus Area 136 | Raynes Park - junction Kingston Road/Bushey Road |
| Focus Area 137 | Wimbledon - The Broadway/Merton Road/Morden Road/Kingston Road |

Figure 5: Map of London Borough of Merton Focus Areas (2013)



Appendix E: Sources of Pollution in Merton

Pollution in Merton comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion of this comes from outside London and beyond the UK.

Of the pollution that originates in the borough the main sources of NO₂ are transport (57.1%), domestic gas boilers (18.8%) and static non-road mobile machinery (11.6%). The main sources of particulate matter are road transport (50.4%), re-suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). (See figures 6, 7 and 8 below).

In respect of the transport sources the LAEI source apportionment data for the borough indicates that diesel vehicles contribute approximately 90% of the NO_x emissions and 80% of the PM₁₀ emissions (based on 2013 modelled data). This supports the evidence from the dispersion modelling (Figures 1, 2 & 3) which indicates that the highest concentrations of both NO₂ and PM₁₀ are most closely associated with the main traffic routes and road junctions within the borough.

Figure 6: NO_x Emissions by source and vehicle type (from the LAEI 2013)

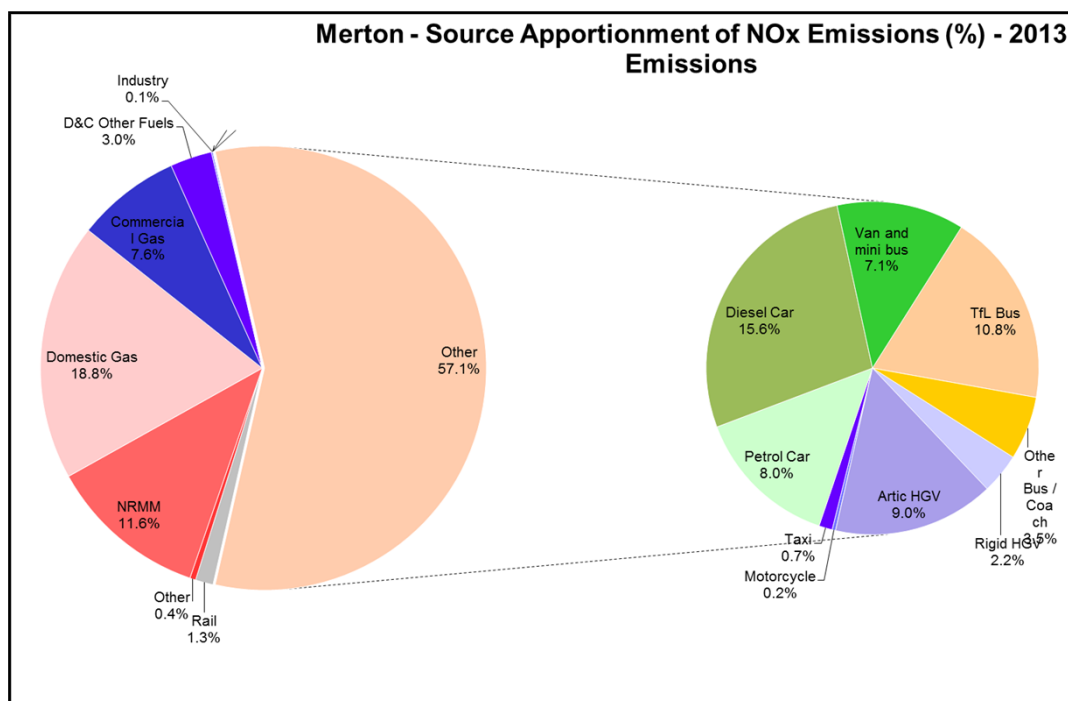


Figure 7: PM10 Emissions by source and vehicle type (from the LAEI add date)

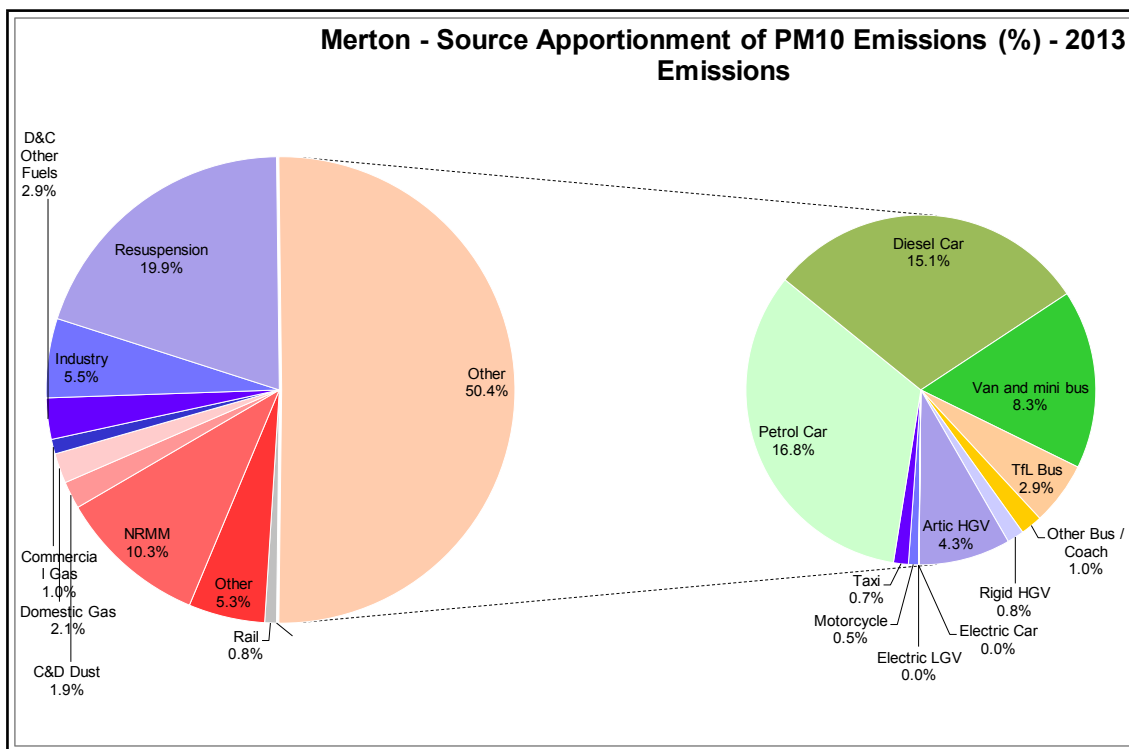
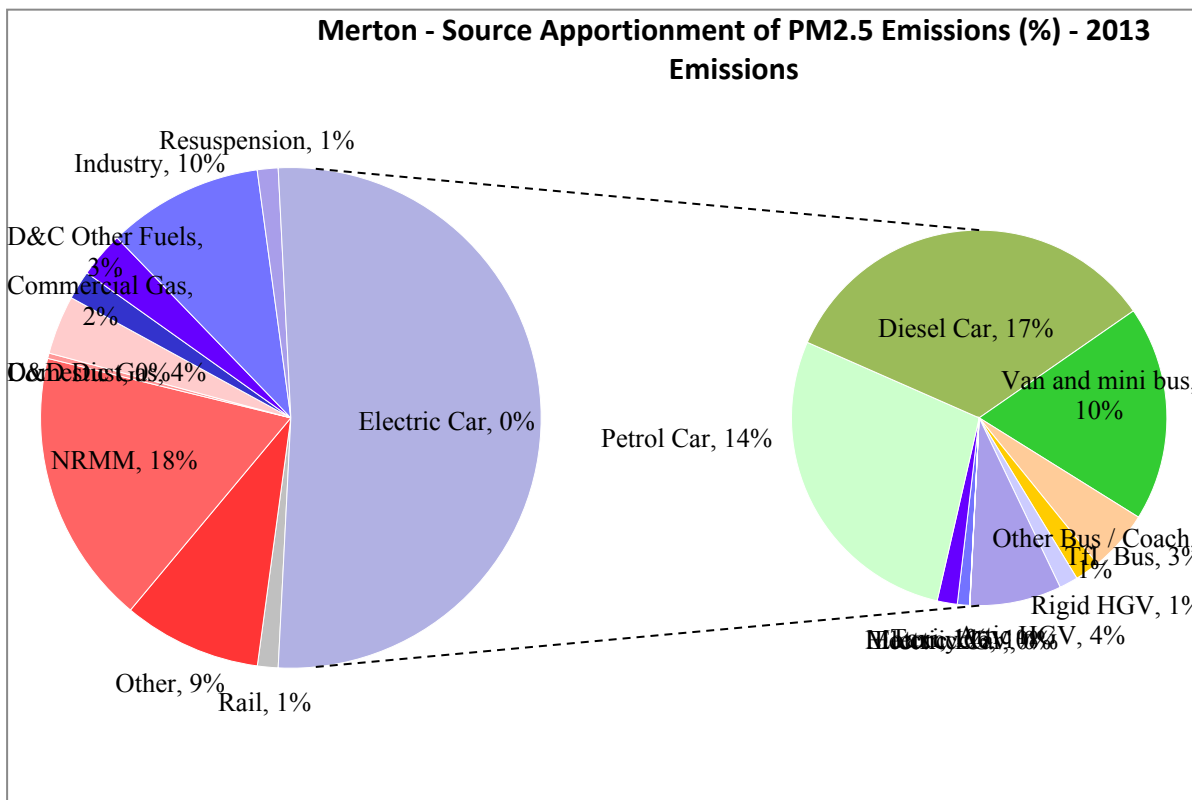


Figure 8: PM2.5 Emissions by source and vehicle type (from the LAEI 2013)



The largest source of NO_x from transport sources is derived from diesel cars (15.6%) followed by HGVs (rigid and articulated) with combined emissions of 11.2%, TfL buses (10.8%), petrol cars (8%) and vans/minibuses (7.1%). In terms of targeting particular vehicle types for selection of Action Plan measures, the borough source apportionment data does not identify any clear dominance in terms of vehicle type but indicates that diesel vehicles across all types are contributing 92% of the total road -NO_x emitted. This suggests that AQAP measures actions need to address emissions from all vehicle types but focus on those which are diesel powered. This includes general measures which aim to reduce traffic volume and improve traffic flow but also more specific measures to increase the proportion of low emission vehicles in the general fleet such as increasing number of electric cars and vans; improving emission standards for local bus and taxi fleets and reviewing freight and delivery practices to minimise emissions in areas with poorest air quality.

The predominant source of non-transport related NO_x emissions is commercial and domestic gas which contributes 26.4% of total NO_x emissions, and non-road mobile machinery which contributes 11.6%. Merton is limited in terms of reducing domestic gas NO_x emissions as the council no longer has any housing stock, however the Merton Air Quality Supplementary Planning Guidance document and GLA Air Quality Neutral policy for London boroughs provide some controls on heating appliances for new and redeveloped properties and businesses.

For non-road mobile machinery (NRMM), Merton has jointly commissioned a NRMM emissions study to identify compliant machinery and develop a checklist for contractors which will be used to improve emissions from machinery and equipment operated on development sites.

Similarly for particulate matter, the dominant source of emissions is transport and within that sector diesel powered vehicles collectively contribute more than 80% of PM₁₀ emissions. Measures to address transport sources generally, and to reduce reliance on diesel fuels, will have a positive impact on PM₁₀ and PM_{2.5} emissions. One additional source of particulate matter is the re-suspension of dust from roads and commercial and development sites. For development sites re-suspension of particulate matter is controlled to some extent by use of the Sustainable Design and Construction and Control of Dust and Emissions Supplementary Planning Guidance and for highways sources, existing street cleansing regimes will have some benefit.

Appendix F: Development and Implementation of Merton's AQAP

Consultation and Stakeholder Engagement

In updating the action plan we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.1. In addition we have undertaken the following stakeholder engagement:

Update as consultation process progresses.

The response to our consultation stakeholder engagement is given in Appendix A.

Table A3: Consultation Undertaken

| Yes/No | Consultee |
|--------|---|
| | the Secretary of State |
| | the Environment Agency |
| | Transport for London and the Mayor of London (who will provide a joint response) |
| | all neighbouring local authorities |
| | other public authorities as appropriate |
| | bodies representing local business interests and other organisations as appropriate |

Steering Group

An AQAP steering group was convened and a meeting to review the first draft of the updated AQAP held on 5th June 2017. Representatives from the following departments attended:

- Public Health - Merton
- Environmental Health – LB Merton
- Environmental Health – LB Richmond upon Thames – adjoining authority/shared EH service
- Spatial Planning policy
- Future Merton commissioning
- School Travel planning
- Sustainability and Climate change
- Development control
- Strategic policy & research
- Transport planning
- Parking services
- Road safety & smarter travel

A review of the draft AQAP was undertaken with suggested amendments incorporated into a revised document. The steering group were broadly supportive of the identified measures. Securing adequate resources was identified as a key requirement for ensuring successful implementation and completion of measures. Opportunities for increased collaborative working between AQ team, Planning, Transport and Sustainability team were identified and the format for effective liaison discussed. The need to share information effectively was identified in order to ensure that AQ impacts are assessed and

mitigated/reduced where possible. Information on existing and planned projects was shared and the AQAP revised to reflect those areas of work.

Appendix G

Abbreviations

| | |
|-------------------|---|
| AQAP | Air Quality Action Plan |
| AQMA | Air Quality Management Area |
| AQO | Air Quality Objective |
| BEB | Buildings Emission Benchmark |
| CAB | Cleaner Air Borough |
| CAZ | Central Activity Zone |
| EV | Electric Vehicle |
| GLA | Greater London Authority |
| LAEI | London Atmospheric Emissions Inventory |
| LAQM | Local Air Quality Management |
| LLAQM | London Local Air Quality Management |
| NRMM | Non-Road Mobile Machinery |
| PM ₁₀ | Particulate matter less than 10 micron in diameter |
| PM _{2.5} | Particulate matter less than 2.5 micron in diameter |
| TEB | Transport Emissions Benchmark |
| TfL | Transport for London |

Responsibilities and Commitments

This AQAP was prepared by Transport Research Laboratory Ltd in conjunction with the Environmental Health Department of Merton Council and with the support and agreement of the following officers and departments:

- *Environmental Health – LB Merton*
- *Environmental Health – LB Richmond upon Thames – adjoining authority/shared EH service*
- *Public Health Merton*
- *Spatial Planning policy*
- *Future Merton commissioning*
- *School Travel planning*
- *Sustainability and Climate change*
- *Development control*
- *Strategic policy & research*
- *Transport planning*
- *Parking services*
- *Road safety & smarter travel*

This AQAP has been approved by:

Councillor Ross Garrod, Cabinet Member for Environment

AQ Measures approved by the Air Quality Scrutiny Panel

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

If you have any comments on this AQAP please send them to:

Jason Andrews

EH Pollution Manager

Regulatory Services Partnership

London Boroughs of Merton and Richmond upon Thames

Civic Centre, London Road, Morden SM4 5DX

[*jason.andrews@merton.gov.uk*](mailto:jason.andrews@merton.gov.uk)





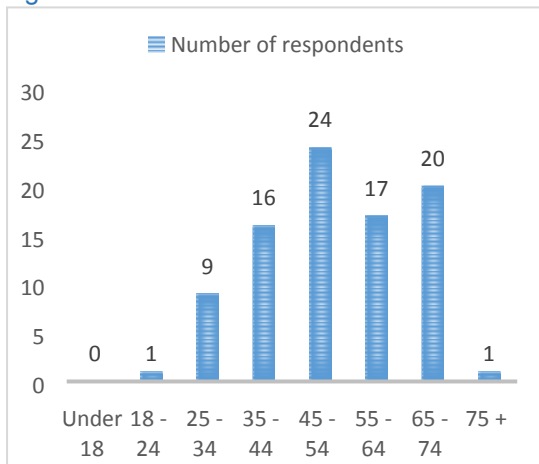
Consultation Analysis

This document summarises the responses to the Council’s Air Quality Action Plan consultation. The action plan proposed a number of actions covering distinct areas of policy.

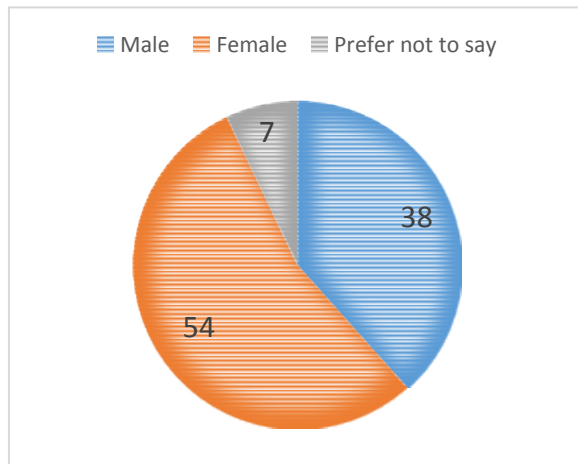
This consultation ran for a period of 6 weeks and resulted in 155 responses.

1. Response demographic

Age Profile

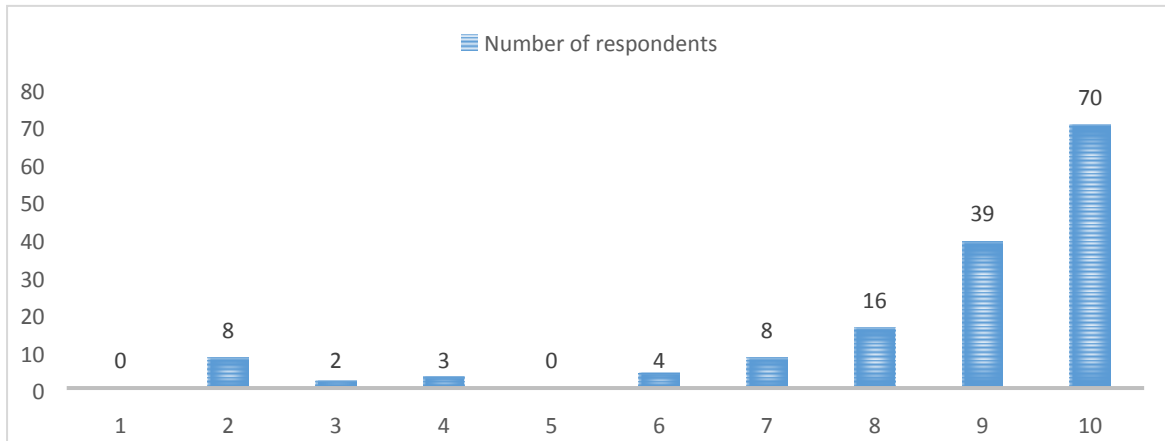


Gender



2. Concern for Air Quality

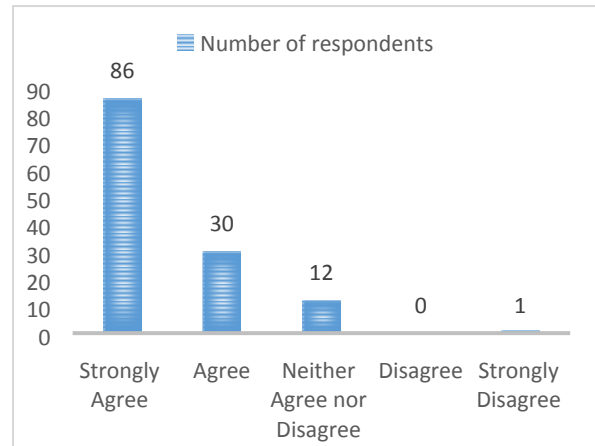
Question; “To what extent are you concerned about air quality in Merton?”



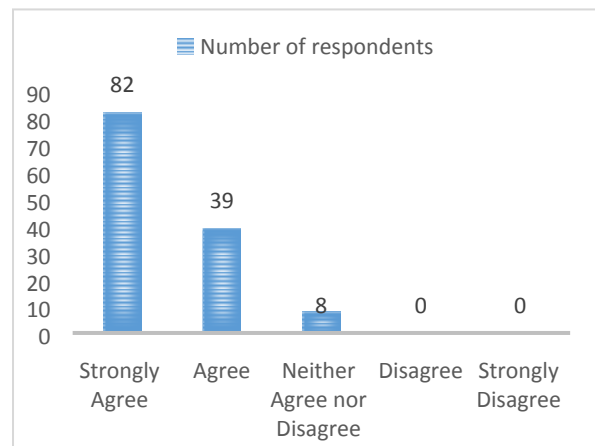
3. The Action Plan proposed measures to tackle poor Air Quality

Question; “To what extent do you agree or disagree with the proposed actions the Council could take?”

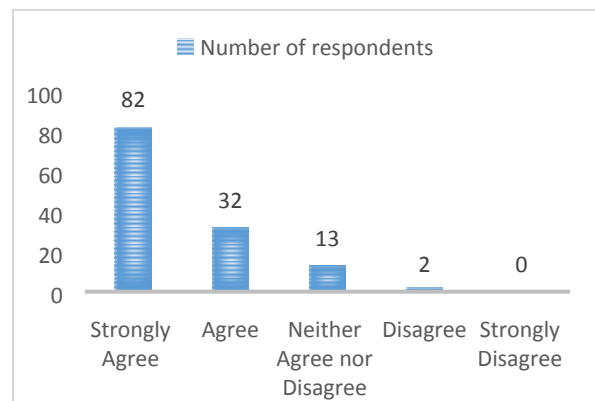
Reducing the impact of new developments on air quality



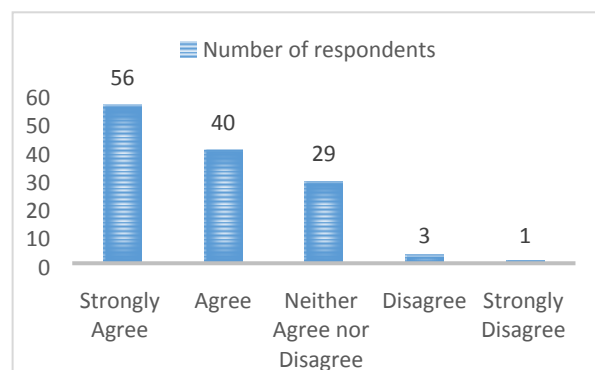
Ensuring enforcement of cleaner construction policies



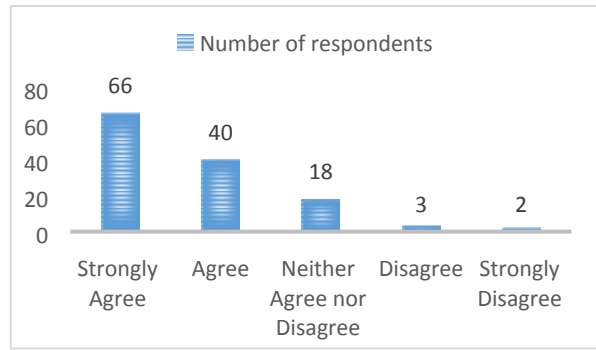
Mapping focus areas and air quality hotspots on planning GIS maps



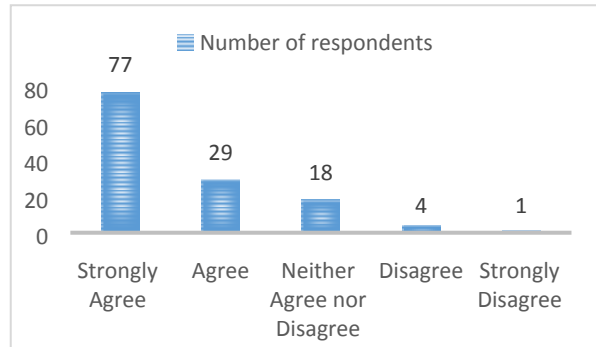
Enforcing CHP and biomass air quality policies



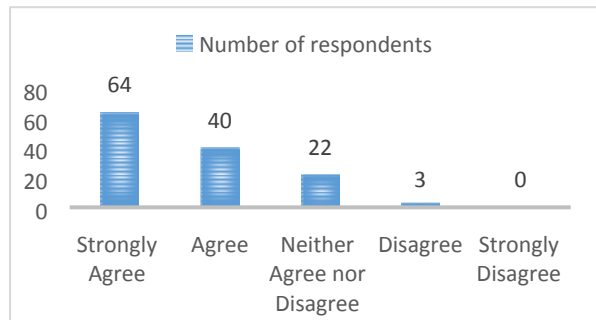
Enforcing air quality neutral policies



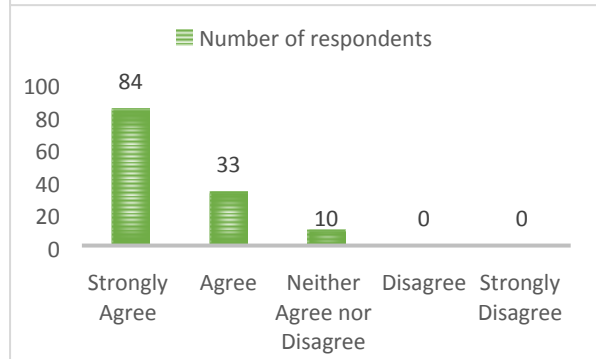
Ensuring that smoke control zones are fully promoted and enforced



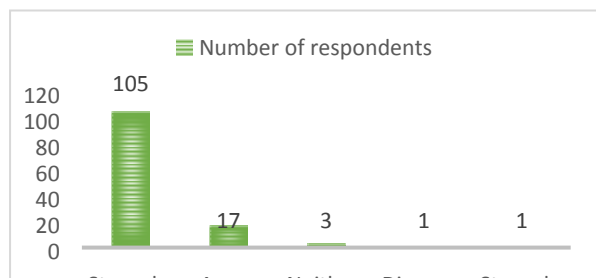
Promoting and delivering energy-efficient retrofitting projects in workplaces and homes



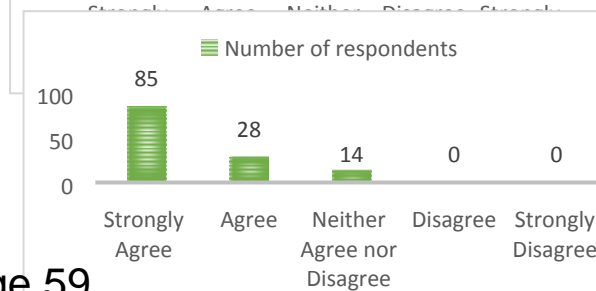
Working more closely with public health colleagues to tackle air quality



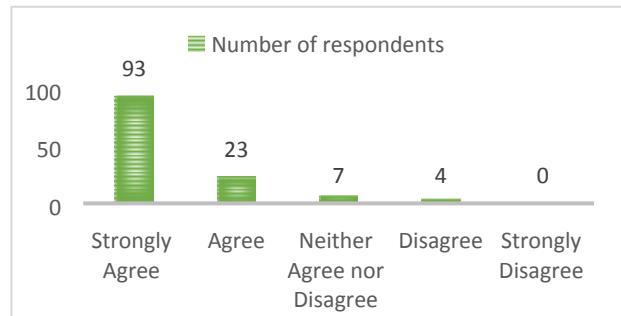
Working more closely with transport colleagues to tackle air quality



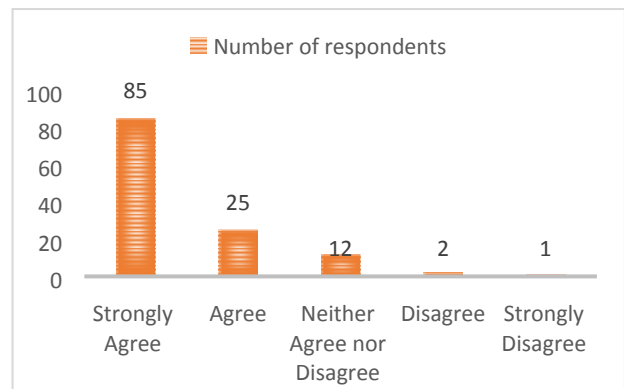
Promoting health and air quality initiatives



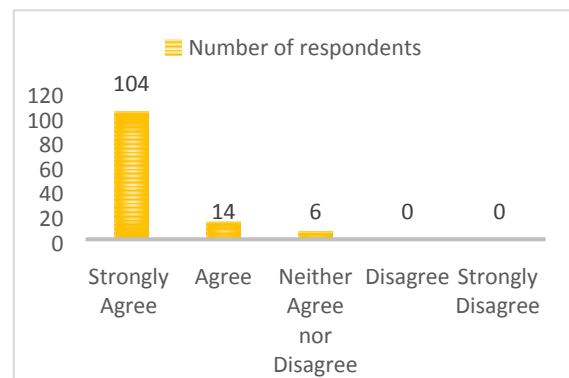
Reviewing air quality at schools by updating school travel plans and reviewing STARS accreditation in line with new initiatives



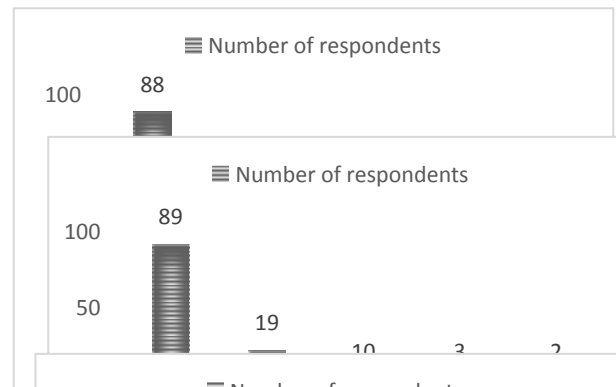
Updating Merton's procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation / EcoStars accreditation scheme



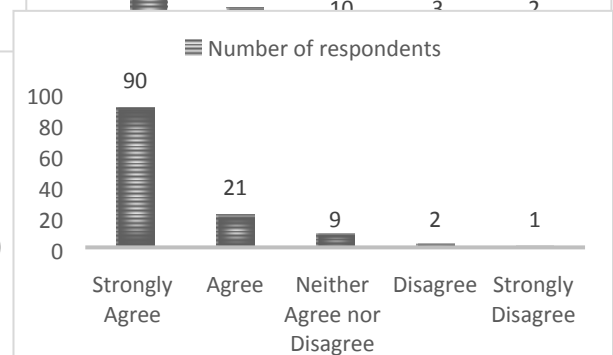
Ensuring Merton's own fleet of vehicles comply with the best possible emissions standards



Conducting a detailed assessment of traffic management solutions for air quality focus areas and pollution hotspots

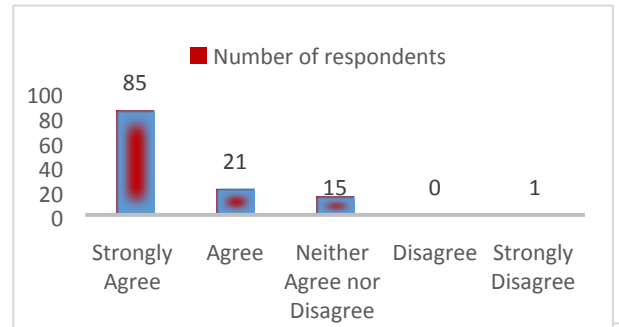


Considering possible implementation of CAZs in parts of the borough

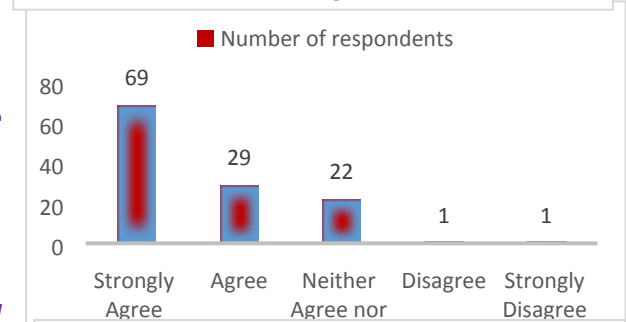


Undertaking audits of air quality in and around Merton schools subject to poor air quality

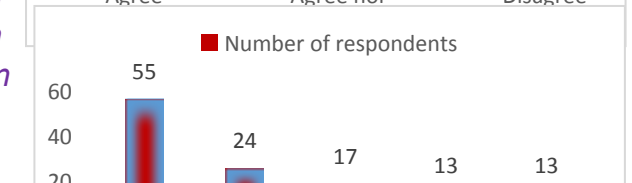
Formalising anti-idling enforcement



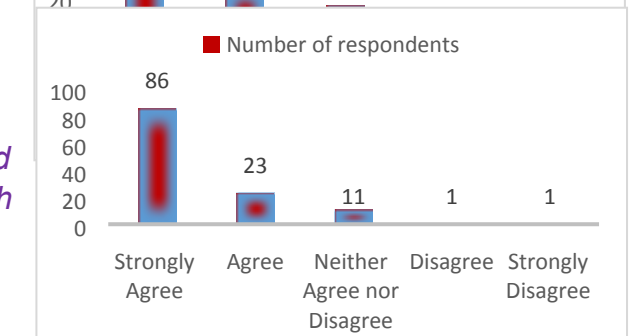
Expand electric vehicle charging infrastructure



Extending use of an emissions-based parking levy for residential and business permits in Merton



Providing infrastructure to support walking and cycling across the borough



Mitcham.

2. Both Mitcham Cricket Green Community and Heritage and Mitcham Society have undertaken air quality monitoring in the area in collaboration with Friends of the Earth and Sustainable Merton. The results confirm that Mitcham's air quality is regularly in breach of World Health Organisation limits. The results for Cricket Green are summarised in our air quality blog and the Mitcham Society surveyed the previously pedestrianised stretch of London Road through Fair Green in June/July 2016 to get readings of 32.51 µg/m³, 31.03 µg/m³ and 31.23 µg/m³ at these points. These and other results have been collated on the Merton hotspots map. Mitcham Common, the grounds of The Canons and Park Place and many of Mitcham's Town Greens act as air quality reservoirs providing both areas of relatively low air pollution and trees and other natural methods for reducing particulates.

3. We welcome the intention to address air quality in Merton and the proposals to extend the Ultra Low Emission Zone to Merton. Nevertheless, we believe the draft Air Quality Action Plan lacks the ambition and measures necessary to address the scale of the problem facing the area.

4. We believe further measures are needed and these should include:

- Targets for improving air quality year on year to 2022
- A network of air quality monitoring stations – particulates and NOx – throughout the Mitcham area, including on Mitcham Common as well as along the roads that pass through it, with data made publicly available in a timely manner
- Zero emission or hydrogen buses on all routes through Mitcham Town Centre and its designation as a Low Emission Bus Zone
- A ban on heavy lorries running on Church Road between Lower Green West and Benedict Wharf as part of the measures to address “hot spots”
- Changed traffic flow at Lower Green West to remove the existing “roundabout” configuration and reconnect it to Lower Green East
- Improved pedestrian permeability in Mitcham Town Centre and Cricket Green – including enhanced pedestrian crossings and reduced crossing times
- A requirement in all travel plans for schools and new development to demonstrate how they will contribute to improvements in air quality, and a commitment from Merton Council to monitor and enforce these travel plans
- Investment in a behavioural change programme to raise awareness of individual actions to improve air quality
- Enforcement against idling cars and lorries which extends beyond any plans to act on idling outside schools
- Community consultation over the location of a network of well-designed electric vehicle charging points in Mitcham as an alternative to the current process whereby Merton Council submits planning applications to itself ahead of any community engagement
- Active programme of succession planting of trees and hedges throughout Mitcham to conserve and enhance tree cover, especially along major routes
- Stronger connections between Mitcham and the Wandle Trail and open spaces, including Willow Lane Industrial Estate
- Active promotion of Mitcham Common as a source of health and wellbeing with relatively better air quality including:
 - Promotion of healthy walks
 - Opening up the Ecology Centre as an affordable location for hosting community-led activity promoting health and well being
 - Management and planting along the fringes to filter particulates.

5. We look forward to contributing to monitoring, delivery and review of the Action

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