



Cabinet
13 November 2017

**Report from the Strategic Director
of Regeneration and Environment**

Wards affected:
ALL

Air Quality Action Plan (2017 – 2022)

1.0 Purpose of the Report

- 1.1 Brent recognises air pollution as a significant problem and is committed to action to clean up and take care of our natural environment by improving our air quality.
- 1.2 The Brent Air Quality Action Plan (2017 – 2022) outlines twenty broad measures the council will undertake to reduce levels of two key air pollutants, nitrogen dioxide and particulate matter, known to be harmful to health.
- 1.3 Consultation on the draft Air Quality Action Plan (2017 – 2022) was agreed by Cabinet on 16 December 2016. Since then the action plan has been subject to extensive public consultation and 478 members of our community responded. Feedback from the consultation was used to adjust the plan where appropriate.
- 1.4 The target date for publication of the plan is 30th November 2017. The new plan will supersede the previous Air Quality Action Plan. Work is currently being undertaken to provide detailed implementation plans outlining how each measure will be delivered.
- 1.5 The purpose of this report is to seek approval of the action plan measures.

2.0 Recommendations

- 2.1 Note the Air Quality Action Plan (2017 – 2022) measures.
- 2.2 Agree the measures can be published as final.

3.0 Background

- 3.1 Brent, like most London boroughs, struggles with poor quality air. While this kind of pollution is a longstanding and regrettable reality in cities such as London, it is neither inevitable nor insurmountable. It is, however, an enormous problem that's taking its toll on our residents to such an extent that it is thought to be contributing to around 200 premature deaths in Brent each year.
- 3.2 The Mayor recognises the significant impacts of long-term exposure to air pollution on health and recently introduced a charge to discourage those driving the oldest and most polluting vehicles into London and is bringing forward plans to impose stricter controls on diesel vehicles. It is estimated that this will reduce harmful emissions in boroughs like Brent by as much as 30% by 2022.
- 3.3 The Mayor intends to take action to tackle exposure to pollution of children following audits of schools in the most polluted areas in London. John Keble Church of England School in Harlesden and Ark Franklin School in Kensal Rise have been selected for inclusion in this programme.
- 3.4 The Mayor has committed resources to assist London local authorities in the delivery of their plans including the provision of a structured regime for managing the process, a long-list of air quality improvement measures to assist local authorities to select those most relevant to them and financial support via the Air Quality Fund. Brent has considered the guidance provided by the Mayor in drafting our air quality action plan and will seek assistance to deliver our most challenging projects where we can.
- 3.5 The London Local Air Quality Management (LLAQM) regime is the regional mechanism for determining compliance with our legal duties. The council will be expected to provide annual updates and demonstrate progress with our air quality objectives to the Mayor.
- 3.6 The Mayor also governs an accreditation scheme to reward local authorities able to demonstrate the impacts of their work. Local authorities can apply for Cleaner Air Borough status which is awarded to those who can demonstrate how they are improving air quality and exceeding upon rather than simply meeting targets. We aim to attain this.
- 3.7 The Mayor recently published additional guidance regarding expectations for local air quality action. The air quality actions outlined in the draft plan were considered in relation to this guidance and remain compliant with the approach set out in the London Local Air Quality Management regime.
- 3.8 Brent is supportive of the actions the Mayor has identified as the highest priority for cleaning the air in London. We are encouraged by the firm stance taken by the Mayor to tackle air pollution from a range of sources and the provision of support for local authorities to do the same. Our air quality action plan outlines measures that are directly aligned with these objectives.

- 3.9 A huge amount of work is required if we are to succeed in cleaning up and taking care of our natural environment. The good news is we understand the problem, we are determined to fix it, and have a strategy for doing so. As this action plan makes clear, there is much we can and will do, both on our own and in partnership with others, to secure a future for Brent in which our air is as clean as it can possibly be.
- 3.10 The Air Quality Action Plan (2017 – 2022) (AQAP) outlines the councils' strategy for reducing local emissions of nitrogen dioxide and particulate matter. This legal duty is a requirement under the Environment Act 1995 and all local authorities must publish and regularly review their action plan once an air quality management area has been declared.
- 3.11 Our AQAP comprises twenty key measures the council will implement to tackle local air pollution and specifically reduce emissions from local transport, construction and industry (see Appendix 1 for the AQAP). These actions have been selected as they will deliver the greatest reduction in pollution over the next five years. Once agreed this will supersede our previous action plan.
- 3.12 The AQAP places a greater emphasis on community engagement in recognition of the critical role our local community can play in assisting us to deliver our air quality objectives. This includes our aim to raise awareness of local air quality issues, inform and update residents about effectiveness of local action and the action we will take to support our community to get involved and undertake their own action.
- 3.13 The AQAP is complementary to other council strategies which target local environmental improvement, seek to reduce or limit the use of private vehicles and promote healthier and non-polluting options for travel such as walking and cycling. As a result, the AQAP will not duplicate the measures outlined in strategies for walking, cycling, or our transport strategy.

4.0 The Air Quality Action Plan Consultation

- 4.1 Consultation on the draft AQAP was agreed by Cabinet on 16 December 2016. Following this the council undertook early consultation with resident focus groups and specifically targeted residents that might ordinarily miss out on environmental messages. Residents were supportive of local action to address air quality but highlighted specific concerns about a number of issues such as exposure of school children to pollution, the lack of safe cycling routes in the borough and pollution from vehicles in general.
- 4.2 Residents also raised concerns about the lack of information regarding sources of pollutants, the councils' options for action to tackle the most polluting vehicles and how low emission neighbourhoods might be selected and implemented. There was a general concern that there was not enough information available to residents to help them understand air quality issues and make informed choices. The detailed summary of responses is provided in Appendix 2a.

- 4.3 The council also met with two residents groups in January 2017 to discuss the draft plan. Feedback from these meetings were used to refine the questions for the main consultation.
- 4.4 The second consultation phase was initiated on 9th February 2017. The deadline was extended in response to requests from residents and the consultation ended on 30th March 2017.
- 4.5 In addition to publicising the plan on the internet, in the press and via social media, the council attended a number of residents meetings to discuss the plan and answer queries. The council received 469 responses to this phase of the consultation.
- 4.6 The consultation consisted of eight questions which included requests for residents to comment generally on local air quality, comment specifically on the twenty actions proposed, rate their highest priorities for air quality action and suggest additional actions that should be included in the plan.
- 4.7 Feedback regarding the plan was generally positive, with residents supportive of the actions proposed overall and over 74% stated they thought the plan would deliver on the objectives partially or entirely.
- 4.8 Most residents perceived air quality in the borough to be poor. Of the residents who responded 78% felt that air quality in Brent was poor, and 19% felt that it was acceptable. The remainder stated they were unsure about local air quality and required more information. Residents also requested additional assistance and guidance so that they could make informed choices about travel and in order to better understand their role in improving local air quality.
- 4.9 The council received a number of requests for air quality information in the context of regional and national action as well as local action. As a result we will liaise with residents regularly to ensure our updates and information are provided in a format that is targeted to cater for specific user groups. Community Engagement is a significant part of the action plan and regular dialogue with residents is recognised as essential to successful delivery of the plan.
- 4.10 Residents raised similar concerns to those identified in the initial consultation phase. A significant proportion of questions raised related to transportation issues or queried the absence of measures to tackle pollution explicitly from this source. Residents' suggestions for additional air quality action measures which could be included in the plan were mainly transport-related and were either outside the remit of the council or already a feature of existing strategies.
- 4.11 Contributions to local pollution already identified as strategic targets in the transport strategy have not been duplicated in the Air Quality Action Plan. The council acknowledges the ongoing concerns of residents regarding wider issues about the impacts of local traffic. In response the council will ensure

that further work is undertaken to communicate our strategic objectives and highlight the synergies between individual plans.

- 4.12 Over 25% of residents who responded to the consultation stated that the council's highest priorities for action should be to tackle unnecessary idling in vehicles and accelerating the uptake of low emission vehicles in the borough fleet. Work is already underway to deliver on these objectives.
- 4.13 The councils' commitment to update our procurement policies, and thereby ensure that those who supply our services are held to the same environmental standards, was considered the lowest priority for action with less than 1% of residents selecting this as a priority measure. Some stated this was because they felt this should be part of usual council business.
- 4.14 A summary of the key findings is provided in Appendix 2b.

5.0 Air Quality Action to date

- 5.1 Progress reports detailing how we are delivering on our objectives will be published each April. We have already started work to deliver on our air quality objectives and examples of some actions for each air quality theme are provided in brief as follows.

5.2 Cleaner Transport

- 5.2.1 The council has continued to work to improve current cycling infrastructure and has developed our first lightly segregated cycle route in Carlton Vale. The council has also begun work to complete a Quietway from Gladstone Park to Regents Park. The council continues to deliver free cycle training sessions, has approved travel plans in 50 schools and 20 nurseries and published strategies for cycling and walking to assist residents to actively choose to make journeys on foot or by cycle where feasible.
- 5.2.2 The council also continues to work to dis-incentivise the use of private vehicles and has reviewed parking permit charges so that those with the most polluting vehicles pay more.

5.3 Exposure Reduction

- 5.3.1 The council routinely undertakes monitoring of air pollution levels across the borough. Since December 2015 the council has significantly improved our local air quality monitoring performance. Our annual data capture rate is now 95%.
- 5.3.2 The council has upgraded our existing air quality monitoring stations and commissioned a new station in Kensal Rise. We have increased the number of local monitoring points by 13 so we now monitor nitrogen dioxide in 40 locations across the borough. The additional monitoring data will assist us to

effectively evaluate the impacts of our air quality objectives and identify new areas that might require additional intervention.

- 5.3.3 This number of monitoring locations is potentially set to increase further still since, as part of our ongoing work to tackle idling, we are providing some schools with local air quality monitoring equipment and technical support.
- 5.3.4 The council is participating in a Mayoral initiative to audit 50 schools in London deemed to be in areas where pollution is highest and identify options for limiting the impacts of poor air quality on children in these areas. This work began in Brent in August 2017 and is expected to be completed by the end of the year.
- 5.3.5 The council has also begun work to improve the public realm and amenity in Neasden Lane. This area has been identified as significantly deficient in green space and following an assessment the council has identified where we will plant 30 trees early next year.

5.4 Community Engagement and Public Health

- 5.4.1 The council has continued to liaise with residents following the consultation on the draft action plan. The council currently works in partnership with a resident's coalition group – Clean Air for Brent (CAfB) to discuss local air quality action, raise the profile of air quality issues and encourage local participation in air pollution action. CAfB have met formally twice since the publication of the draft plan.

5.5 Delivery Servicing and Freight

- 5.5.1 The council is currently exploring options to reduce congestion in town centres by reconsidering off-peak delivery. This pilot study involves 3 large commercial operators and focuses on deliveries undertaken in Wembley, Neasden (North Circular Road) and Queens Park / Chamberlayne road. Results of the project are expected to be published before the end of the year.
- 5.5.2 The council has also started work to evaluate the actual air quality benefits of selected traffic improvement schemes rather than rely solely on estimates generated by models. This will enable the council to quantify actual air quality improvements in terms of real-time emission reductions and provide additional data to inform future decisions about other schemes such as potential low emission neighbourhoods.

6.0 Next Steps

- 6.1 Subject to agreement by Cabinet the AQAP will be published by 30th November 2017. Each action will be supported by a detailed implementation plan and these are currently under development.
- 6.2 The Air Quality Action Plan will be subject to annual review in compliance with our legal duties under the LLAQM and these status reports will be published in

April. The council will consider amendments to the plan at each annual review in accordance with changes to legislation or other priorities. In addition, the council will periodically communicate progress and key achievements in local air quality action to residents and local businesses. How progress with our objectives will be communicated will be included in the detailed implementation plan.

- 6.3 The council will also undertake a mid-term review to evaluate progress and check our actions are delivering as predicted.

7.0 Financial Implications

- 7.1 The Air Quality Action plan is anticipated to be delivered within existing budgets. However, subject to complying with the LLAQM criteria, the council can also apply for funding for air quality projects from the Mayors Air Quality Fund, which will be subject to availability.
- 7.2 Any requests for additional funding, or savings arising out of its implementation, will be managed through the normal budgeting process.

8.0 Legal Implications

- 8.1 The council has a statutory duty to comply with the requirements of the Environment Act 1995. This states that all local authorities must publish an air quality action plan once they have declared an air quality management area and continue to review and assess local air quality until national targets are met.
- 8.2 Governance of this regime for London local authorities has been devolved to the Mayor. As a result the council must demonstrate compliance with the LLAQM regime and provide regular updates regarding compliance with air quality objectives to the London Mayor.
- 8.3 The Government is subject to new legal pressure for failure to meet air quality targets and further legal proceedings are imminent. The council cannot anticipate at this stage the potential implications of this action for Brent or the additional legal requirements that might be imposed following the publication of the Governments updated clean air strategy scheduled for next year.

9.0 Equality Implications

- 9.1 An Equalities Assessment is currently being carried out to determine if the AQAP is likely to have a differential impact on members of the community with protected characteristics.
- 9.2 The Equalities Assessment screening template for the EA appended to the cabinet report

10.0 Staffing/Accommodation Implications (if appropriate)

10.1 None

Background Papers

Appendix 1 – The Air Quality Action Plan (2017 - 2022)

Appendix 2a –Phase 1 Brent Air quality Action Plan Consultation

Appendix 2b –Phase 2 Brent Air quality Action Plan Consultation Summary

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