



**Resources and Public Realm
Scrutiny Committee**
14 April 2020

**Report from the Operational
Director for Environment**

**Update on the Implementation of the Air Quality Scrutiny
Report and Recommendations**

Wards Affected:	All Wards
Key or Non-Key Decision:	N/A
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	One: Appendix A – Brent Breathes Report of the Air Quality Scrutiny Inquiry
Background Papers:	Two: <ul style="list-style-type: none"> • Air Quality Scrutiny Task Group Report to Cabinet 14 January 2020 • Air Quality Actions Report to Cabinet 20 April 2020
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1.0 SUMMARY/PURPOSE OF THE REPORT

1.1 The Resources and Public Realm Scrutiny Committee Air Quality Task Group prepared a report titled 'Brent Breathes', which included a list of ten recommendations, which was presented to Cabinet on 14th January 2020.

- 1.2 An Executive report considering actions in response to the recommendations set out in the 'Brent Breathes' report was approved by Cabinet at the meeting on 20th April 2020.
- 1.3 This report provides an update to the Scrutiny Committee against those actions over the past year.

2.0 RECOMMENDATION

- 2.1 That the Scrutiny Committee notes the updates provided in this report.

3.0 BACKGROUND

- 3.1 The Resources and Public Realm Scrutiny Committee established a Scrutiny Task Group to consider the issue of Air Quality in Brent in July 2019.
- 3.2 Cabinet considered and noted the report and its ten recommendations at the meeting on 14th January 2020.
- 3.3 Officers were tasked to consider the contents of the report and its recommendations, and provided a report to Cabinet on Air Quality Actions for their consideration and approval.
- 3.4 Cabinet approved the Air Quality Actions put forward in relation to the Scrutiny Committee recommendations at the meeting on 20th April 2020.
- 3.5 This report provides an update on the approved actions one year on.
- 3.6 It is important to note that the onset of the COVID-19 pandemic coincided with Cabinet approving the proposed Air Quality Actions in April 2020. This had unforeseeable consequences in relation to resource availability and focus, with rapid changes to funding sources and priorities in response to the pandemic. While this has enabled the roll out of ambitious programmes, such as the TfL Streetspace funded Active Travel schemes, some actions have not been progressed over the past year. This sets the context for progress against actions outlined in this report.
- 3.7 Since the Brent Breathes report was published, there has also been a landmark inquest into Ella Adoo-Kissi-Debrah's death in 2013, which found on 16th December 2020 that air pollution "made a material contribution" to the nine year old's death. This tragic case illuminates the issue of air pollution as a public health crisis and is important context when it comes to planning future air quality actions.
- 3.8 Brent's current Air Quality Action Plan (AQAP) is due to be updated over the course of 2021/2022. This will provide an opportunity to review and commit to further actions over the next five years.

Recommendations and Proposed Air Quality Actions

- 3.9 Officers have reviewed each of the recommendations in the 'Brent Breathes' report and provided an update on current and planned actions:

Recommendation 1. That the Council update the Air Quality Strategy and set out an aspiration to meet World Health Organisation (WHO) limits on air pollution, commit to addressing inequality in air quality, and compliment the wider climate emergency agenda. We should also lobby national government where we are unable to effect change ourselves.

Initial response:

- 3.10 Our Air Quality Action Plan 2017-2022 currently uses the EU legal requirements, which may change with Brexit with central Government legislative changes. The WHO limits are clearly lower and therefore far more challenging to meet.
- 3.11 In relation to air quality inequality, the areas within Brent which are likely to exceed national air quality objectives have been allocated as an Air Quality Management Area (AQMA). Within the AQMA, the worst affected areas for air pollution have been identified as hot spots, and have therefore been designated as air quality action areas. Both the AQMA and action area allocations were reviewed in 2016. The Greater London Authority (GLA) are due to review designated air quality hot spots in 2021. Improvement projects should concentrate on these areas as a matter of priority in the strategy. The main monitoring and project work is currently focussed with the AQMA and action areas. The AQMA encompasses the whole of the south of the borough due to high levels of vehicle emissions (particularly cars, heavy goods vehicles and buses) as well as higher levels of background pollution.
- 3.12 The Council will continue to work with the GLA and London Councils to deliver air quality improvement initiatives and the London Environment Strategy 2018.

Update:

- 3.13 Brent's AQAP is due to be updated over the course of 2021/2022 for publication in 2023. The objective to strive for the WHO guidelines for PM by 2030, in line with the London Environment Strategy 2018, will be considered as part of that review.
- 3.14 The location of the action areas will be reviewed as part of the AQAP review, with the publication of updated London Atmospheric Emissions Inventory data in 2021 by the GLA.
- 3.15 The Council will continue to work with the GLA and London Councils to deliver air quality improvement initiatives and the London Environment Strategy 2018.
- 3.15 The Council has published its Climate and Ecological Emergency Action Plan (2021-2030) which includes a theme solely around Transport, and key areas of

focus for improving active travel, moving away from petrol and diesel vehicles and encouraging public transport when it is safe to do so. All of this will contribute to improving air quality within the borough. This strategy has been developed in consultation with officers responsible for air quality actions across the Council.

Recommendation 2. That the Council, in consultation with Transport for London, and the Football Association, agree a strategy to reduce the air quality impact of non-resident car use in Brent.

Initial response:

- 3.16 The Council recognises the negative impact of non-residential car use has on air quality in Brent and the need to reduce car travel both to and through the borough.
- 3.17 The Council will be developing a Parking Management Strategy in 2020 in preparation for the expansion of the Ultra Low Emission Zone (ULEZ) to the area south of the A406 North Circular Road in October 2021 and the potential impact on congestion and air quality.
- 3.18 The Council will work with the Football Association, TfL and strategic partners in developing a strategy for reducing car use and the negative impact on air quality.
- 3.19 Local journeys also contribute towards congestion and air quality. The Council have an emissions based permit charging scheme and introduced a diesel levy in April 2019, and will continue to raise awareness of the effects of car travel on air quality and encourage behavioural change towards sustainable travel.

Update:

- 3.20 TfL have reviewed the potential impact of the ULEZ expansion on congestion and air quality and advised that there is a relatively small risk of non-compliant vehicles parking just outside boundary and switching mode to access destinations inside the zone. TfL have also provided some new guidance on parking post Covid-19 that aligns with London Streetspace Plan principles. The impact the ULEZ has on parking will need to be monitored and new controls considered as part of a revised Parking Management Strategy, which will be progressed in 2021.
- 3.21 The Council is still committed to working with the Football Association, TfL, and strategic partners in developing a strategy for reducing car use and the negative impact on air quality. However, this could not be progressed over 2020 due to the need to focus resources on dealing with the COVID-19 pandemic.
- 3.22 Over the past year, the Council has implemented an ambitious programme of Active Travel initiatives in response to the COVID-19 pandemic. The Council was successful in bidding for TfL Streetspace funding, after LIP funding was

paused, and through this has continued to raise awareness of the effects of car travel on air quality and encouraged behavioural change towards sustainable travel. This has been achieved through the implementation of School Streets, with thirty participating schools, and also reducing rat-runs with 5 new Brent Healthy Neighbourhoods, with a further 5 planned for the spring 2021, following community engagement.

<https://www.brent.gov.uk/services-for-residents/transport-and-streets/making-travel-safer-and-healthier/>

3.23 The 2021/22 Local Implementation Plan Annual Spending Submission will also focus on Active Travel measures. A report will be considered by Cabinet following confirmation from TfL on funding that will be made available. This currently remains uncertain as TfL have experienced severe financial difficulties due to the pandemic and are negotiating a settlement with the Department for Transport (DfT).

3.24 To assist with developing future schemes in relation to promoting a shift away from car usage, the Council also set up an interactive online community engagement tool, which is being used to crowdsource resident ideas for making active travel in Brent an easy and safe option. The site achieved:

- 3390 visitors (An individual person who visited a Commonplace website. If a person used multiple devices, they may be counted as several visitors)
- 3773 contributions (The total number of comments and agreements by respondents to express their opinion)
- 751 respondents (A person who contributed to a Commonplace website by either adding a comment or an agreement)

<https://brentactivetravel.commonplace.is/>

3.25 In addition, Brent supported Car Free Day 2020 and Clean Air Day 2020 with online communications campaigns to share the impact of car usage across the borough.

- <https://www.brent.gov.uk/council-news/september-2020/take-the-car-free-pledge-as-you-return-to-work-with-myfreecartrip/>
- https://twitter.com/Brent_Council/status/1314083165749817344
- <https://www.bestbrent.co.uk/Article/79154>

Recommendation 3: That the council set up a Green Brent Partnership: a forum with organisations impacting air quality in Brent- including the private sector, community organisations and campaign groups – to agreed shared targets to improve air quality locally. We should also lead by example taking steps to reduce the air quality impact of Brent Councils own activities.

Initial response:

- 3.26 Steps are being taken to form a Brent Community and Environmental Action Network to encourage partnerships in response to the Climate Emergency. The Interim Report on Brent's Response to the Climate and Ecological Emergency to Full Council on 25th November 2019 sets out the steps the Council has taken and includes an Annual Green Summit;
<http://democracy.brent.gov.uk/documents/s91750/14.%20Interim%20Climate%20Emergency%20Report.pdf>
- 3.27 A forum dedicated to air quality may be an effective way of working with local community groups and businesses to raise awareness and improve air quality in the borough, and this will be explored further.
- 3.28 The Council will explore future opportunities for reducing emissions from its activities and has an extensive programme of installing electric vehicle charging points across the borough, providing cycle hangers and cycle parking and will continue to promote sustainable travel.

Update:

- 3.29 In response to the Climate and Ecological Emergency, the Brent Environmental Network has been established and launched. This new network of local residents, businesses, community groups, and schools will encourage partnership working in response to the Climate and Ecological Emergency. The network has seen just under 350 members join so far. The most recent e-newsletter sent to the network's members (March 2021) was solely focused on the topic of air quality, and highlighted the initiatives that both the council and the community are undertaking to contribute to improving air quality in the borough, and the steps that people can take to simultaneously reduce air quality and contribute to reducing carbon emissions.

<https://www.brent.gov.uk/your-community/climate-emergency/community/brent-environmental-network/>
- 3.30 A forum dedicated to air quality will be considered particularly in relation to reviewing the AQAP however there has not been scope to take this forward over the past year.
- 3.31 The Council is actively exploring opportunities for reducing emissions from its activities:
- Through the development of a new Sustainable Procurement Policy, we will aspire to review and replace our current fleet with low emission models over the next ten years.
 - Additionally, the Council is developing a Staff Travel Plan to support Council staff in reducing car usage and adopting active modes of travel wherever possible, capitalising on the opportunity to build back greener following the COVID-19 pandemic.

- Anti-Idling guidance has been published for Brent staff, members, and suppliers and contractors to encourage those travelling around the borough to switch off their engine wherever possible. This has been disseminated to Council staff and suppliers, with workshops offered on the topic.
- 3.32 In order to tackle emissions from freight and deliveries, the Council has also arranged for business engagement activities to take place over 2021. Following a successful bid by Brent and the Cross River Partnership (CRP), the borough will be involved in a 21-month long project to improve air quality in the Willesden Green area, by helping businesses recover from COVID-19 in a sustainable way. The “Clean Air Villages” project (CAV4) is being delivered by the CRP and is funded by Defra’s Air Quality Grant. The Willesden High Road area is an Air Quality Focus Area, which means it has been identified as having poor air quality. Overall, the project aims to engage with businesses to deliver ambitious “Freight Solutions for a Clean Air business recovery from COVID-19”. The CAV4 Freight Solutions when implemented will incorporate consolidation; distribution; mode; technology; and policy elements, trialled across different ‘Villages’ – one of which will be the Willesden High Road area.
- 3.33 In addition, a pilot cargo-bike engagement scheme is being run in Harlesden town centre in Spring 2021. Several businesses are being offered the opportunity to trial a partially subsidised cargo bike. A Try Before you Bike scheme has also been set up which also now includes cargo bikes.
- 3.34 The Council has an extensive programme of installing electric vehicle charging points across the borough, providing cycle hangers and cycle parking. To date we have 5 Rapid Charging Points, 61 Source London Charging Points and 85 Lamp Column Charging points. With an investment of circa £764,000 of Office of Low Emission Vehicles (OLEV) grant funding and £150,000 of S106 developer and Capital funding, we are implementing a further 180 Lamp Column Chargers, 100 kerbside Chargers over the next 6 months. A further £300k of s106 Developer funding has been secured for an additional 50 cycle hangars over the next 2 years. Work has also commenced on the development of an Electric Vehicle Charge Point Delivery Plan which will set out the Council’s approach to accelerating delivery of EVCP infrastructure in the borough in line with objectives of the Council’s emerging Climate Change Strategy and Air Quality priorities. The Plan will identify the types of infrastructure required (and locations for these), establish mechanisms for funding/delivery and set out the range of processes for implementation.

Recommendation 4: That the Council closely monitors and review the air quality impact of current policies and, most particularly the Ultra-low emission zone, and consider implementing or lobbying for stronger measures if necessary. It should also keep the provision of air quality monitoring sites under review.

Initial response:

- 3.35 Monitoring is ongoing as part of Brent’s Air Quality Action Plan obligations. Further funding would be required for more extensive air quality monitoring, however, Brent are planning to proactively pilot low-cost air quality sensors

utilising emerging technologies. The Council will also benchmark with neighbouring boroughs on collating air quality data.

- 3.36 TfL will monitor and report on the potential effects of the ULEZ expansion, officers will raise concerns with TfL on the measurement of the impact in neighbouring areas or arrange local air monitoring.

Update:

- 3.37 Over the course of 2020, Brent Council arranged for extra air quality monitoring to assess the impact of schemes implemented through the TfL Streetspace programme. Diffusion tubes were installed to monitor all School Streets and Brent Healthy Neighbourhood schemes which will provide annual mean concentrations of NO₂ – although this does not provide categorical assessment of the impact of these schemes on air quality, it ensures the local air quality in these surrounding areas are being assessed.

- 3.38 In addition, Brent Council arranged to be included in the GLA monitoring study of School Streets, the report for which can be found here:

<https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/school-streets-air-quality-study>

- 3.39 The Brent IKEA monitoring site underwent an upgrade in 2020. This is situated next to the North Circular Road and the upgrade was essential to improve and retain good data capture.
- 3.40 Brent have progressed a pilot of low-cost air quality sensors utilising emerging technologies which is due to run in Spring/Summer 2021.
- 3.41 The Council will benchmark with neighbouring boroughs on collating air quality data as part of the upcoming AQAP review.
- 3.42 TfL will monitor and report on the potential effects of the ULEZ expansion, officers will raise concerns with TfL on the measurement of the impact in neighbouring areas or arrange local air monitoring. Furthermore, the GLA are due to release updated air quality data through the London Atmospheric Emissions Inventory (LAEI) which will include modelled projections. This data will be fully assessed once received.

Recommendation 5: That the Council make the delivery of Healthy Streets a central; corporate and political priority across the borough, working closely with residents to expand the number of healthy street locally.

Initial response:

- 3.43 The Healthy Streets Approach puts people, and their health, at the heart of decision making to provide a healthier, more inclusive environment where people choose to walk, cycle and use public transport.

- 3.44 The Council recognises that Healthy Streets schemes have been delivered successfully across London, and have resulted in behavioural change and reduced congestion and air pollution, particularly where there has been a significant investment.
- The development of a strategy to consider how areas of the borough should be prioritised for healthy streets investment would be beneficial. Whilst there is a place for well-established road safety and traffic calming measures, this approach could be embedded into the design of future projects. The Local Implementation Plan (LIP) Annual Spending submission report to Cabinet on 11th November highlighted a healthy neighbourhood approach;
<http://democracy.brent.gov.uk/documents/s91056/10.%20LIP%20Annual%20Spending%20Submission%20Report%20Cabinet%20v6%20Final.pdf>
- 3.45 Two ‘schools streets’ are being piloted with the aim to roll out to other areas in the borough as part of our LIP programme. These are schemes that prohibit vehicles, (except emergency, service and residents vehicles), from entering streets near schools during morning and afternoon peak hours. CCTV enforcement cameras with Automated Number Plate Recognition (ANPR) technology have been installed.

Update:

- 3.46 During the course of 2020, in response to changing priorities as a result of COVID-19, a Draft Brent COVID-19 Transport Recovery Plan was developed and consulted on. Healthy Streets and prioritising space for pedestrians and cyclists feature as key priorities. The Plan is to be reviewed following consultation and will be re-branded as an Active Travel Implementation Plan. This work is expected to be completed by the end of 2021.
- <https://www.brent.gov.uk/your-community/coronavirus/changes-to-council-services/transport-and-streets/>
- 3.47 In addition, the Brent Long Term Transport Strategy is also being reviewed. An internal steering group has been established to inform its development. The Healthy Streets approach again is a key priority and links in with air pollution objectives. A draft plan is scheduled to be taken to Cabinet in Summer 2021 for approval to undertake wider consultation. It is anticipated that the revised plan will be completed by early 2022.
- 3.48 Over the past year, through the TfL Streetspace scheme, there has been a focus on giving space to pedestrians to enable social distancing and also to promote a green recovery from the pandemic. Through this, the following has been achieved:
- **School Streets**
- The School Streets programme has expanded rapidly through successful bids for funding from the TfL Streetspace Scheme. The two ‘school streets’ which were being piloted have now been made permanent and CCTV

cameras with Automated Number Plate Recognition (ANPR) technology have been installed. Thirty additional schools are participating in pilot School Streets schemes. These are being consulted on until 30th July 2021 after which a decision will be made whether to make them permanent or not. So far, funding has been identified for a total of 8 ANPR cameras which will assist with making a number of schemes permanent. A report from GLA finds that School Streets can result in up to 23% reduction in NO2. These are schemes that prohibit vehicles, (except emergency, service and residents vehicles), from entering streets near schools during morning and afternoon peak hours.

<https://www.brent.gov.uk/services-for-residents/transport-and-streets/making-travel-safer-and-healthier/school-streets/>

- **Brent Healthy Neighbourhoods**

The Council have implemented 5 new healthy (Low Traffic) Neighbourhood schemes with plans for a further 5 new schemes in the Spring. Following the Extraordinary Meeting of Full Council on 16th October 2020, we have committed to enhanced public Engagement and monitoring arrangements. Living Streets have recently been commissioned to support the public engagement and work with local communities to develop schemes that provide local benefits and are supported. Funding for 8 ANPR CCTV Cameras has been secured for some locations to improve accessibility by the emergency services.

<https://www.brent.gov.uk/services-for-residents/transport-and-streets/brent-healthy-neighbourhoods/>

- **Pop up cycle lane on Harrow Road**

In September 2020 we implemented a new temporary cycling lane between Wembley Triangle and the A406 North Circular Road. We are currently working with TfL on developing a permanent strategic cycle lane on this route.

<https://www.brent.gov.uk/services-for-residents/transport-and-streets/making-travel-safer-and-healthier/improving-cycling/>

- **Pavement widening**

Pavements in 19 locations in some of our busiest streets in town centres have been temporarily widened to help residents stay safe and enable them to safely social distance to prevent the spread of COVID-19.

Recommendation 6: That the council outline, publish and consult on a clear strategy for engagement with TfL on active travel initiatives – including the planned Willesden to Wembley cycle superhighway , measures to improve public transport provision, and any future initiatives to improve accessibility over the North Circular.

Initial response:

- 3.49 The Council have established Active Travel and Public Transport forums, which are attended by partners, including TfL, with a focus on improvements that need to be made to promote active travel and the use of public transport within the borough. We will continue to work with TfL on active travel initiatives.
- 3.50 TfL in partnership with the Council are now developing a Healthy Streets Corridor between Wembley and Willesden. The scheme will include improvements for walking, cycling, public transport accessibility, as well as greening along the corridor.
Pre-engagement meetings with members were held in January 2020, with pre-engagement surveys with residents and businesses taking place in February 2020. A report will be taken to Cabinet in the late spring 2020.
- 3.51 The Council plan to engage with TfL to discuss emission reduction on the North Circular, which is the single highest source of transport related pollution in the borough and improving accessibility.

Update:

- 3.52 The Healthy Streets Corridor between Wembley and Willesden Junction has been paused due to TfL financial difficulties and many of their staff, including those in the Cycling Infrastructure team, being furloughed over the last year. However, this work has resumed although funding has yet to be confirmed. A priority for the Council remains the need to improve cycle and pedestrian access over physical barriers such as major roads, railways and waterways as a means of reducing severance and connecting our communities. We will continue to work closely with the likes of TfL, Network Rail and developers to explore options to fund and implement measures that will improve accessibility and improve conditions for cyclists and pedestrians.
- 3.53 There will be discussions with TfL on the North Circular Road and opportunities to reduce emissions during 2021.
- 3.54 The Brent Active Travel and Public Transport forums are ongoing.

Recommendation 7: That the Council expand the number of initiatives for dealing with the impact of housing and the built environment, and engage closely with experts to consider further steps as new evidence and technology emerges.

Initial response:

- 3.55 The impact of the built environment on air quality in Brent will require assessment and our policies can be aligned to our strategies for growth to reduce any negative impact.
Brent's Energy and Sustainability team have a number of active initiatives that aim to reduce emissions from housing and in regeneration areas, and will consider further opportunities.

- 3.56 A cross council Air Quality Action Group has been established which is attended by the Lead Member for the Environment to focus on meeting air quality improvement targets. This group shall also consider evidence and emerging technologies and initiatives to support lower emissions. Brent are applying to the Greater London Authority for Cleaner Air Borough status in June 2020.

Update:

- 3.57 All planning applications received by the council are assessed for potential air quality impacts by the Regulatory services team. If necessary, planning conditions are applied to mitigate potential emissions from construction dust and any other potential impacts on local air.
- 3.58 The council proactively promotes initiatives to cut energy use, signposting commercial and residential building owners to assist them to replace old boilers and encourage them to adopt other measures to get the most out of energy they use. Brent's Energy and Sustainability team have a number of active initiatives that aim to reduce emissions from housing and in regeneration areas, and will consider further opportunities.
- 3.59 The council actively discourages the domestic burning of waste and provides alternatives such as green waste collection service. Burning of waste on commercial premises and at waste facilities is prohibited.
- 3.60 During 2020, Brent Council joined a pan-London working group on wood-burning to establish best practice across London for sharing information on regulation with solid fuel suppliers.
- 3.61 A cross council Air Quality Action Steering Group was planned to be established in 2020 but this was postponed due to COVID-19. This will be set up in 2021 in relation to the AQAP review to ensure all relevant departments across the Council feed into this process. This group shall also consider evidence and emerging technologies and initiatives to support lower emissions.
- 3.62 As part of the Climate and Ecological Emergency 2021-22 delivery plan, the Council is developing a plan for the council to achieve net zero carbon emissions from the council's own estate and operations by 2030.

Recommendation 8: That the council continues to support green space as a way of supporting active travel, and because of its wider benefits to health, the climate and biodiversity, but ensure that measures to improve greening are not promoted as an alternative to dealing with the underlying causes of poor air quality.

Initial response:

- 3.63 Greening including the planting of trees, creating rain gardens, meadowing and providing pocket parks and parklets are integral to a Healthy Streets approach to create an environment that encourages active travel, and will be considered in future schemes.
- 3.64 While greening may act as a physical barrier to air pollution, it may not mitigate against the impact of poor air quality apart from some particulate matter adhering to foliage, and will not be considered as an alternative to addressing wider issues. Consideration will be given to on the type of greening that should be used to maximise benefits including sustainable urban drainage and biodiversity, and minimise ongoing maintenance costs. Local community groups or schools could assist in maintaining plantings and greening and this would have a benefit in helping to promote civic pride in our neighbourhoods.
- 3.65 Brent's Local Plan 2020 will set out our vision for protecting and enhancing the built and natural environment, and transport for continuing growth to 2041 and beyond. Sustainable infrastructure, with an aim for all development in growth areas to be Air Quality positive, and a focus on sustainable travel and a healthy streets approach will support improvement to air quality in the borough.

Update:

- 3.66 A core aim of the Draft Long Term Transport Strategy is making our streets safer, greener and more inclusive. A key priority is expanding the provision of 'green' infrastructure, including the greater use of 'parklets', street trees, green walls and Sustainable Drainage Systems (SuDS) as a means of reducing environmental impact and mitigating climate change. We will also look to trial the use of 'innovative' surface materials as a means of improving local air quality and reducing disturbance from vehicle noise.
- 3.67 Greening, including new street trees and rain gardens, will be embedded in major schemes such as the Kensal Corridor Improvements and Kilburn High Road schemes. This will help establish a greener and more pleasant environment to encourage walking.
- 3.68 The "Right green infrastructure, right place guideline' published by the Greater London Authority provides best practice on using green infrastructure to protect people from air pollution (April 2019). There is strong evidence to show that greening can act as a physical barrier to air pollution which is important where reducing emissions at the source will take a long time.
- 3.69 A pilot green barrier project has been scoped for 2021. The Council will be working with at least one school to install a green barrier where a playground boundaries a busy road with the aim to reduce pollution exposure.
- 3.70 As part of the Council's Climate and Ecological Emergency Strategy, in 2021-2022 the Council is developing a Green Infrastructure Vision for Brent for 2030

which will include consideration of air quality hot spots to implement street level interventions.

Recommendation 9: that the council continues to promote measures to improve air quality in our schools, and where possible enhance and expand on existing initiatives. It should work in partnership with schools and students to agree a shared approach to improving air quality in the borough.

Initial response:

- 3.71 The Council has established a robust and on-going programme of air quality auditing and education at schools in the borough. Our 'Breathe Clean' Project,' targeted 56 primary and 10 secondary schools; two air quality assemblies were delivered at each school covering London's current air quality, methodologies for measuring air quality and ways of combatting pollution. In the weeks between assemblies, air quality was measured, with the help of the pupils, across each school. We are now launching phase two, which targets infant schools. This initiative has helped raise awareness and will encourage behavioural change amongst parents and carers.
- 3.72 We continue to engage with schools on their travel plans and raise awareness about the effects of poor air quality to encourage behavioural change.
- 3.73 The focus is now on rolling out a 'school streets' programme as it is recognised that school travel plans and engineering work to improve safety for walking and cycling have not addressed congestion around many of our schools.

Update:

- 3.74 Significant work has been undertaken over the course of the past year to improve air quality outside schools with the implementation of schools streets outside thirty schools. The GLA has demonstrated that School streets can reduce NO2 concentrations by up to 23% in the morning run. As part of this project, NO2 diffusion tubes have also been installed outside participating schools so that local air pollution can be monitored.
- 3.75 The Breathe Clean project has now been completed and a report is available. The data from this, along with data provided by the GLA, has been collated and is being used to help prioritise schools for interventions, such as the green-screen pilot project and anti-idling events.
- 3.76 As part of the Council's Climate and Ecological Emergency Strategy, the council will be establishing a specific Schools Climate Champions Network within the overarching Brent Environmental Network. The creation of a dedicated schools network is aimed to bring together the relevant environmental leads from within all of Brent's schools as champions for the environment. It will provide a mechanism for staff collaboration on best practice, knowledge sharing and as a platform for ideas and discussion on how schools

and the council can work together most effectively to achieve our aims for carbon neutrality and a greener, cleaner and more sustainable future for all.

Recommendation 10: That the Council, working with the health sector, statutory partners and Brent's Public Health team, spearhead a public health awareness and behavioural change campaign about air quality. The local NHS should also play its part in delivering this, and lead by example in the measures they take to improve air quality.

Initial response:

- 3.77 Brent acknowledges that in order for air quality to improve in the Borough, strong partnerships with local NHS trusts need to be forged.
- 3.78 The Council is working with hospitals in the borough to establish the Clean Air Hospital Framework, a programme of assessing the hospital for air pollution processes and find ways of mitigating such emissions, to protect patients, workers and visitors. There will also be a major public health awareness raising aspect to this initiative.
- 3.79 In relation to public awareness, the Brent Public Health Team is working to develop an online Public Health Dashboard to enable residents to access health data relating to air quality (amongst other things) more readily.
- 3.80 Our Public Health team can explore further opportunities to make information available through the NHS locally as well as through GPs surgeries to promote both the health benefits of active travel and reducing exposure to indoor air pollution

Updated response:

- 3.81 Over the past year, the Public Health Team's priority has been responding to the COVID-19 pandemic. However, it is recognised that this is an integral workstream to re-establish, especially given the potential links of severe COVID-19 with air pollution exposure and also the landmark inquest of Ella Adoo-Kissi-Debrah's death, ruling that air pollution "made a material contribution" to the nine year old's death.
- 3.82 An air quality webinar was included as part of Brent's Health and Wellbeing Fair in February 2021 to help raise awareness of the issue.
- 3.83 Furthermore, a working group has been set up to establish the most effective channels to share Air Quality alerts with vulnerable residents. This includes representatives from Public Health and it is planned to have a finalised communications plan in Summer 2021.

Further Actions

- 3.84 We have commenced planning for a new Air Quality Action Plan from 2023. This will involve a review of our priorities and public engagement, and this will

be subject to consultation with stakeholders during development over the next 18 months.

- 3.85 The Air quality Steering group Meetings will be re-established in the Spring of 2021. This group focuses on the delivery of the London Local Air Quality Management (LLAQM) priorities and we plan to apply for Clean Air Borough status this year as applications for 2020 were paused.
- 3.86 Whilst the recommendations within the Brent Breathes report are welcomed and supported, progress will be dependent on establishing strong collaborative partnerships and funding available.

4.0 FINANCIAL IMPLICATIONS

- 4.1 The Council has established annual revenue budgets in place specifically for two members of staff to monitor air quality and for policy and projects. This is a total of £122,400, of which £58,200 is within Regulatory Services for air quality monitoring and £64,200 in Highways and Infrastructure for Policy and Projects. It is envisaged that an additional member of staff will be required to deliver air quality improvements in the borough, the cost of which will be £58,200 per annum to be funded from existing Council budgets.
- 4.2 There are also capital budgets available for the delivery of infrastructure improvements and initiatives which include supporting sustainable travel, the primary source being £2.247m of TfL grant funding to deliver the Councils Local Implementation Plan (LIP), but this is subject to confirmation by TfL. This funding will be used for Healthy Neighbourhoods, localised measures to encourage safe and sustainable travel, for improved walking and cycling amenities, greening and for localised air quality monitoring using diffusion tubes / reports / studies.
- 4.3 For 2020/21 TfL also allocated £0.9m from their bus priority programme for infrastructure improvements to benefit bus accessibility and reduce journey times. Officers anticipate reduced level of funding will be available for 2021/22.
- 4.4 The Council have committed to invest up to £20m of capital funding for a footway improvement programme, which will help encourage walking in the borough. This spend commenced in 2019/20. This is in addition to the annual £3.5m capital funding allocation which for 2019/20, has been targeted towards improving the condition of the boroughs roads. Some of this funding will be used for improvements to local shopping areas, which will include greening.
- 4.5 The Council may also have the opportunity to bid for TfL Liveable Neighbourhood funding to support Healthy Streets projects and also Mayors Air Quality Funding for air quality projects and initiatives.
- 4.6 Additionally, approximately £1m of funding is usually available through S106 developer contributions for schemes to mitigate the impact of development in the borough. Some of this funding can be allocated to support sustainable transport, providing it meets the terms of the legal agreement.

- 4.7 Officers are also considering the use of Community Infrastructure Levy (CIL) towards infrastructure projects to improve sustainable travel.
- 4.8 There may also be opportunities in the future to secure partnership funding for joint initiatives.
- 4.9 The financial implications on revenue and capital budgets on delivering air quality actions will be assessed in detail as projects and initiatives are further developed.

5.0 LEGAL IMPLICATIONS

- 5.1 The management and improvement of air quality is largely driven by European Union (EU) legislation. The 2008 ambient air quality directive (2008/50/EC) sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). With Brexit, the UK may opt to adopt the stricter standards of the World Health Organisation (WHO) objectives, or enshrine the EU limit values into UK law.
- 5.2 In the UK, responsibility for meeting air quality limit values is devolved to the national administrations in Scotland, Wales and Northern Ireland. The Secretary of State for Environment, Food and Rural Affairs has responsibility for meeting the limit values in England and the Department for Environment, Food and Rural Affairs (Defra) co-ordinates assessment and air quality plans for the UK as a whole.
- 5.3 The UK Government and the devolved administrations are required under the Environment Act 1995 to produce a national air quality strategy. The strategy sets out the UK's air quality objectives and recognises that action at national, regional and local level may be needed, depending on the scale and nature of the air quality problem.
- 5.4 Clean Air Act 1993 (CAA) was introduced to address air pollution from smog caused by widespread burning of coal for residential heating and by industry. The CAA covers England, Wales and Scotland and there is separate legislation for Northern Ireland. The legislation targets smoke emission from chimneys and premises and smoke emissions from residential and non-residential furnaces. Although some activities fall on Defra and the Devolved Administrations, the key CAA measures are applied and supervised by Local Authorities. The CAA is the legal instrument to address such pollution.
- 5.5 Vehicle idling is an offence under The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. The law states that; is an offence to idle your engine unnecessarily when stationary. If you fail to turn your engine off after being asked to do so by an authorised officer, you may be issued with a fixed penalty notice of £20 increasing to £40 if the fixed penalty is not paid before the expiry of the prescribed time'. As part of the Pan-London Vehicle Idling Action campaign, Brent is pursuing this aspect of enforcement to help reduce air pollution from idling vehicles in the borough.

6.0 DIVERSITY AND EQUALITY IMPLICATIONS

- 6.1 The public sector duty set out at Section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not share that protected characteristic.
- 6.2 There are no diversity implications arising from this report and its recommendations at this time. However, an Equality Assessment will be carried out for any future proposals for strategies, initiatives and projects to improve air quality in the borough.

7.0 STAFFING / ACCOMMODATION IMPLICATIONS (IF APPROPRIATE)

- 7.1 The need for an additional member of staff to assist with the delivery of these Air Quality actions and future initiatives has been identified, please refer to the finance section for further information.
- 7.2 There are no requirements for the alteration of accommodation.