



**Cabinet**  
11 December 2023

**Report from the Corporate Director  
of Resident Services**

**Lead Member – Cabinet Member for  
Environment, Infrastructure &  
Climate Action  
(Councillor Krupa Sheth)**

**Air Quality Action Plan Adoption**

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	<p>Eight:</p> <p>Appendix A: Air Quality Action Plan – Full version</p> <p>Appendix B: Air Quality Action Plan – Easy Read version</p> <p>Appendix C: Community Outreach Report for the Draft Air Quality Action Plan</p> <p>Appendix D: Consultation Report for the Draft Air Quality Action Plan</p> <p>Appendix E: Air Quality Management Area Order</p> <p>Appendix F: Finance table</p> <p>Appendix G: Equalities Impact Assessment</p> <p>Appendix H: Communications plan for Air Quality Action Plan adoption</p> <p><b>Please note due to their file size the above appendices have been published as a separate pack to the main agenda.</b></p>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	<p>Sandor Fazekas Head of Healthy Streets and Parking 020 8937 5113 <a href="mailto:Sandor.Fazekas@brent.gov.uk">Sandor.Fazekas@brent.gov.uk</a></p> <p>Lauren Salisbury Air Quality Policy and Project Officer</p>

## 1.0 Executive Summary

- 1.1 The London Borough of Brent (LBB) recognises that air pollution remains a significant problem and is committed to taking action to improve air quality and raise awareness of its impacts, especially amongst our most vulnerable residents.
- 1.2 Brent's Air Quality Action Plan (2023– 2027) (AQAP) outlines thirty-seven measures the Council will undertake, in partnership with others, to reduce levels of two key air pollutants; nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), both known to be harmful to health.
- 1.3 The AQAP also proposes the extension of Brent's Air Quality Management Area (AQMA) to cover the entire borough. AQAPs are developed to manage pollution within AQMAs; extending the boundary of Brent's AQMA has the benefit of ensuring the AQAP is applicable to the whole borough and also reflects that, despite improvements, pollution across the whole of the borough needs to continue to be reduced.
- 1.4 The AQAP has been developed through community outreach, stakeholder workshops and public consultation. This has led to 16 priority actions being developed under 5 themes, which are detailed on page 7-8 in Appendix A.
- 1.5 The focus for the Council over 2023-2027 is set out in the Core Aims of the AQAP on page 19 Appendix A:
  - Reduce pollution concentrations as quickly as possible, striving for World Health Organisation guidelines;
  - Raise awareness of the health impacts of air pollution and address health inequalities;
  - Influence change by leading by example and working with strategic partners.
- 1.6 The 2023-2027 AQAP updates the previous AQAP plan (2017-2022); with key developments including:
  - Committing to strive for World Health Organisation guidelines,
  - Increasing the focus on addressing PM<sub>2.5</sub> emissions in response to health impact evidence and updated national targets, and
  - Expanding the scope to include raising awareness of indoor air pollution (not just outdoor).
- 1.7 Consultation on the draft AQAP was agreed by Individual Cabinet Member Decision on 13 March 2023. Since then, the action plan has been subject to public consultation. Over 400 people were spoken with, and 92 members of our

community responded to the consultation. Feedback from the consultation was used to adjust the plan where appropriate.

- 1.8 The GLA approved the AQAP on 19 October 2023 with a minor edit to include target for engaging with businesses and cargo bike trials. The AQAP was also presented at the Health and Wellbeing Board on 30 October 2023.
- 1.9 The target date for publication of the plan is 12<sup>th</sup> December 2023. The new plan will supersede the previous AQAP (2017-2022). Work will be undertaken to provide detailed implementation plans outlining how each air quality action plan measure will be delivered.
- 1.10 The purpose of this report is to seek approval for the adoption of the Air Quality Action Plan as well as approval for the Air Quality Management Area Order, which extends the AQMA to cover the whole borough (Appendix E).

## **2.0 Recommendation(s)**

- 2.1 To note the Air Quality Action Plan (2023-2027) actions.
- 2.2 To agree the action plan can be published as final (Appendix A).
- 2.3 To approve the Air Quality Management Area Order (Appendix E).

## **3.0 Detail**

### **3.1 Cabinet Member Foreword**

- 3.1.1 Progress has been made in reducing air pollution concentrations across the borough for the key pollutants (NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>). However, some areas in the borough are still exceeding the legal limits for NO<sub>2</sub> and the majority of the borough exceeds the new PM<sub>2.5</sub> limit set in 2023. Moreover, pollution levels across the whole borough are higher than the World Health Organisation (WHO) guidelines.
- 3.1.2 To address this, the AQAP sets out the actions the Council will take over the next five years to continue to reduce pollution and to raise awareness of its health impacts, striving for clean air for everyone in the borough.
- 3.1.3 Taking action to improve air quality supports a range of key Council policies. It is included as a theme in the Borough Plan, which sets out the vision for the Council for the next four years, under the strategic priority “A Cleaner, Greener Future”.
- 3.1.4 Additionally, several Council policies recognise that reducing air pollution is critical to improving the health and wellbeing of Brent’s residents and reducing inequalities. Brent’s Inclusive Growth Strategy (2019-2040) prioritises improving air quality under two key themes; “Health” and “Environment”. The borough’s Joint Health and Wellbeing Strategy includes a theme of “Healthy

Places” which aims to create a borough where residents have access to clean air.

- 3.1.5 As road transport remains a dominant source of pollution in the borough, there are direct links with the aims of the AQAP and Brent’s Long Term Transport Strategy (LTTS). The LTTS provides the strategic direction for investment in transport in Brent, with the aim of improving transport options for all and to reduce the negative impacts of travel on the borough, including air pollution. Our aim is to reduce traffic in Brent by 25% by 2041. The AQAP’s theme of “Cleaner Transport” supports the core aims of this strategy.
- 3.1.6 The AQAP also supports Brent’s Local Plan, which sets out our strategy for future development in Brent and includes specific policies on air quality to reduce pollution from developments in the borough.
- 3.1.7 Lastly, air quality and the climate and ecological emergency are closely linked, with similar solutions. Therefore, action we take in the borough to tackle air pollution, and vice-versa, will be win-win; it helps to improve air quality while helping to reduce carbon dioxide emissions. Therefore, the AQAP aligns with the Council’s Climate & Ecological Emergency Strategy 2021-2030 and contributes to the Council’s commitment to do all in its gift to strive for carbon neutrality by 2030.

## **3.2 Background**

- 3.2.1 With Brent’s existing AQAP expiring at the end of 2022, a review of the plan has been undertaken. This review resulted in a new draft of the AQAP (2023-2027), which was consulted on in Spring 2023. A proposed final version of the AQAP is presented in Appendix A, along with an Easy Read version in Appendix B.
- 3.2.2 Significant progress has been made to air quality in the borough over the last five years through the delivery of the 20 actions within the 2017-2022 AQAP. Data from the London Atmospheric Emissions Inventory (LAEI) demonstrates that average concentrations of NO<sub>2</sub> were approximately 22% lower in 2019 than in 2016 illustrating the improvements made. Highlights of the projects delivered through the previous action plan include:

### **Theme 1: Cleaner Transport**

- **Targeted reduction in diesel vehicle use** – emissions based permits introduced with permit charges increasing to £100 in 2021
- **Tackling engine idling** – 482 drivers were engaged as part of anti-idling events
- **Installing electric vehicle infrastructure** – 350 chargers installed across the borough

### **Theme 2: Public Health and Community Engagement**

- **Engage with local businesses to reduce local air pollution** – cargo bike trials held in Harlesden and Willesden Green town centres

- **Working with schools to raise awareness** – rolling out 28 permanent school streets, running the Breathe Clean project at 80 schools and continuing the School Travel Planning programme
- **Promoting air quality action days** through annual Clean Air Days and Car Free Day

### **Theme 3: Exposure Reduction Measures**

- **Develop Low Emissions Neighbourhoods** – Green Neighbourhoods introduced in Church End and Kingsbury
- **Upgrade of green infrastructure** – projects include Green Infrastructure Vision developed, public realm improvement projects delivered, Willesden Green living wall

### **Theme 4: Emissions from Developments and Buildings**

- **Limiting the impact of new developments using planning policies** – Brent's Local Plan 2021 stipulating that major developments cannot use gas boilers, introducing Air Quality Positive, and publishing a Sustainable Development SPD,
- **Improve energy efficiency in council buildings** - 68% reduction in CO2 emissions in 2021/22 compared to 2010/11 baseline
- **Promote and enforce Smoke Control Zones** – joined the GLA's wood burning group and inspected all fuel suppliers in the borough
- **Promote energy efficiency retrofitting projects in workplaces and homes** - 400 residents have consulted the Warmer Home Advice Service since 2018

### **Theme 5: Delivery Servicing and Freight**

- **Update our procurement policies** – sustainable procurement policy published in 2021

3.2.3 However, despite improvements, air pollution continues to harm our health and economy and worsen inequalities. A review of the 2017-2022 AQAP has shown that more action needs to be taken, especially in the following areas:

- We need to work more closely with our partners on reducing emissions and raising awareness of the health impacts of pollution, such as health providers, community champions, and Transport for London, especially for our more vulnerable residents.
- We need to lead by example, for instance through tackling emissions from Brent's own fleet.
- We need to focus attention on where air pollution is worst in the borough through expanding our Air Quality Focus Areas and extending the borough's Air Quality Management Area.

3.2.4 Since the publication of the previous AQAP, research has enabled a deeper understanding of the harm pollution can cause to all our health, even at low levels. Air pollution is the largest environmental threat to public health in the

UK. Exposure to air pollution is estimated to cause 36,000 premature deaths each year. In 2019, 4,100 deaths in London were caused by air pollution, 149 of these were in Brent. Outer London boroughs (such as Brent) suffer more deaths caused by air pollution than inner London boroughs. This, in part, is due to a higher proportion of elderly people in these areas and asthma rates. Collectively, PM2.5 and NO2 are responsible for over 8% of all deaths in the borough<sup>1</sup>. It is important to note that, even where the outcome is not mortality, pollution affects the quality of life of all residents and future health outcomes, contributing to the development asthma, heart disease, cancer, and dementia even if someone does not have underlying health conditions.

3.2.5 This has an economic impact on the health and care system; the 2019 Clean Air Strategy<sup>2</sup> estimated air pollution in England could cost £5.3bn a year in terms of health and social care by 2035 if no action is taken. This is a cumulative cost for health conditions strongly associated with air pollution: coronary heart disease; stroke; lung cancer; and childhood asthma. When wider health conditions associated with pollution are added, the costs could reach £18.6bn by 2035. These include chronic obstructive pulmonary disease; diabetes; low birth weight; and dementia.

3.2.6 It is known that some people are more susceptible to the impacts of pollution, exacerbating inequalities. This includes:

- People with existing health conditions, such as asthma and heart disease
- Children
- Elderly
- Pregnant women
- Communities in areas of higher pollution, such as close to busy roads

3.2.7 With respect to inequalities, the GLA have found that the most deprived communities of London still more commonly live in the most polluted areas and the areas in London with the lowest NO2 and PM2.5 concentrations have a disproportionately white population. Furthermore, the inequalities in exposure to air pollution experienced between ethnic groups are more pronounced **in Outer London boroughs (figure 1 and 2)**. In Outer London, the lowest NO2 concentration decile comprises a 71% white population, whereas in Inner London, the lowest NO2 concentration decile is 56% white, in 2019<sup>3</sup>.

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<sup>1</sup> [GLA Air Quality in LB Brent: A Guide for Public Health Professionals \(2022\)](#)

<sup>2</sup> [Clean Air Strategy 2019](#)

<sup>3</sup> [Greater London Authority air quality exposure and inequalities study \(2023\)](#)

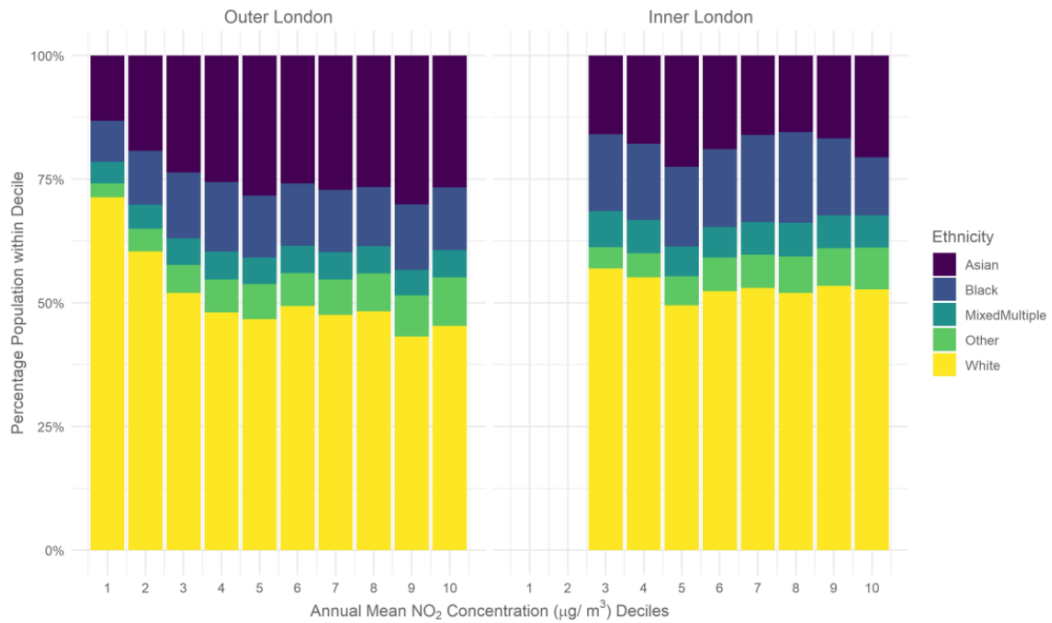


Figure 1. Percentage of population of each ethnicity group by NO<sub>2</sub> Concentration deciles for Outer and Inner London in 2019

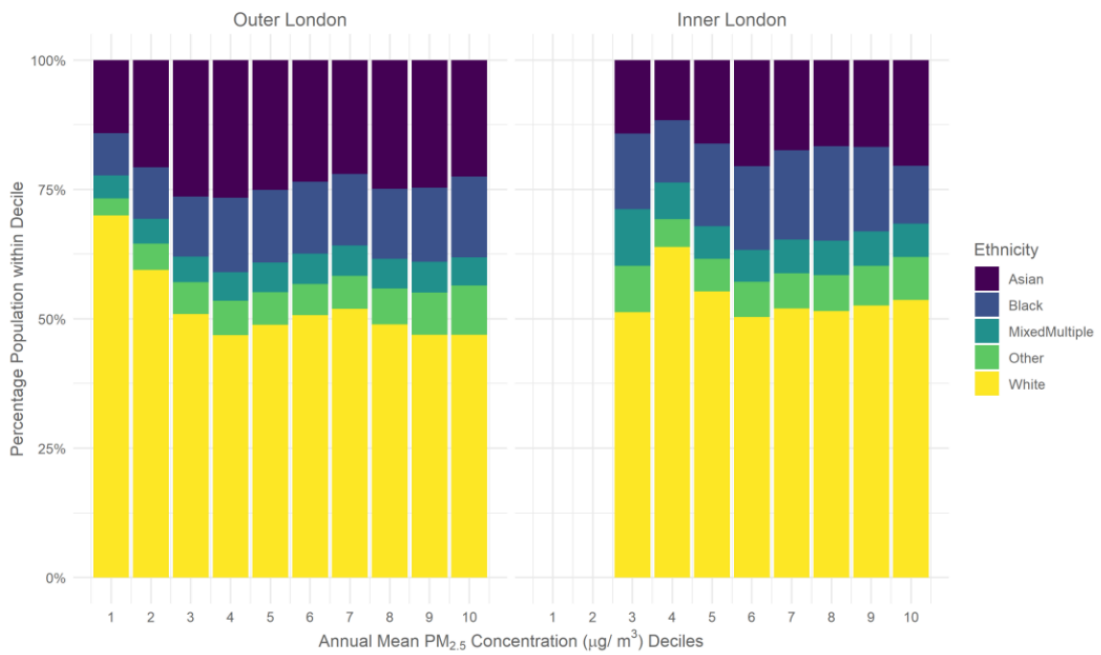


Figure 2. Percentage of population of each ethnicity group by PM<sub>2.5</sub> concentration deciles for Outer and Inner London in 2019

3.2.8 In Brent, there are 18,537 people who suffer with asthma, 2,409 of whom are children. In 2022, 168 0-14 year olds were admitted to hospital for asthma and 340 65+ for asthma or COPD (WSIC DID, 2023). The tragic passing of nine-year-old Ella Adoo-Kissi-Debrah, who is the first person to have air pollution listed as a cause of death after suffering a fatal asthma attack, illuminates the importance of tackling pollution; it can save the lives of the most vulnerable in our society.

- 3.2.9 The AQAP acknowledges the scale of this issue and sets out what 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. It outlines the Councils' strategy for reducing local emissions of NO<sub>2</sub> and PM. This is a legal duty, a requirement under the Environment Act 1995, as amended 2021; all local authorities must publish and regularly review their action plan once an AQMA has been declared.
- 3.2.10 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 the air quality objectives outlined in the plan to the Mayor of London. This is the minimum requirement for all London authorities.
- 3.2.11 The AQAP comprises thirty-seven measures, across five themes, which the council will implement to tackle local air pollution at source as well as raise awareness of the health impacts amongst Brent residents (see Appendix A for the AQAP). There are 16 actions which have been identified as a priority (Appendix A page 7); they have been selected through consultation and as they will deliver the greatest impact in pollution reduction and awareness raising over the next five years. The five themes are:

**Theme 1) Cleaner Transport** – this includes incentivising walking and cycling, providing infrastructure to make our streets safer and more inclusive, aiming for a reduction in traffic, delivering electric vehicle charging infrastructure, discouraging engine idling, working with and lobbying partners such as TfL and the Canal and River Trust to provide clean public transport and improved walking and cycling routes. It also includes working with businesses to reduce emissions from vehicles delivering goods and services and leading by example by tackling Brent's own fleet such as mini-buses and refuse collection vehicles.

**Theme 2) Monitoring air pollution and other core statutory duties** – this includes maintaining the borough's monitoring network and where possible expanding it to understand where pollution is worst, and what reduction measures are effective. It also includes a commitment to report against the World Health Organisation Guidelines and make air pollution as transparent as possible for residents.

**Theme 3) Public health and awareness raising** – this includes partnering with health care providers, schools, and early years settings to raise awareness of the health impacts of air pollution and to provide resources on reducing exposure, leading to direct health benefits especially for those most vulnerable to the impacts of pollution. Included in this theme is a commitment to deliver a programme of pop up events across the air quality focus areas with pollution information tailored to the local area. Priority areas for this programme include the North Circular, Harlesden, and Church End. This theme also covers promoting air pollution alerts and route planner tools, and a focus on indoor as well as outdoor pollution.



**Theme 4) Emissions from homes, buildings, and developments** – this includes using Planning Policy to ensure emissions from construction and developments are minimised by using relevant planning conditions and Air Quality Positive and Air Quality Neutral policy through Brent’s Sustainable Environment and Development Supplementary Planning Document. It also includes the commitment to continue to reduce emissions from Brent offices and council buildings and supporting schools to decarbonise. Ensuring the Smoke Control Zone is promoted and enforced to reduce emissions from wood burning is also central to this theme.

**Theme 5) Localised Solutions** – this includes creating hyper-local plans to target emissions reductions where they are needed most through the introduction of Green Neighbourhoods across the borough, focussing sustainable solutions in priority areas and also through developing location specific action plans for Air Quality Focus Areas as part of the Local Implementation Plan (LIP) programme.

3.2.12 In addition, through a detailed review of air quality data across the borough in relation to the Air Quality Objectives and World Health Organisation guidelines, the AQAP provides an update to Brent’s Air Quality Management Area (AQMA) (to be extended to cover the whole borough) and Air Quality Focus Areas (AQFAs), which are defined as pollution hotspots where there are also high levels of population exposure (e.g. town centres).

3.2.13 Once agreed, this plan will supersede our previous action plan published in 2017.

#### **4.0 Stakeholder and ward member consultation and engagement**

4.1 The AQAP was developed using community outreach, an internal officer Air Quality Steering Group, a review of air quality data for the borough conducted by WSP Ltd, and Action Planning workshops held with council officers and external stakeholders where relevant (e.g., TfL, NHS North West London Integrated Care Board, Central and North West London NHS Foundation Trust, and Brent CVS). Further details on this methodology are included in Section 4 of Appendix A. In addition to this, the London Local Air Quality Management System (LLAQMS) was used as a framework for developing the plan and actions.

4.2 At the outset of the AQAP development process in October 2021, community outreach was undertaken to understand the priorities of people who work and live in Brent. The primary goal was for residents to have their say on deciding the priorities of draft AQAP. Led by Kaizen Partnerships Ltd, this engagement took place over 27 days in twenty-one locations within Brent, including all Town Centre’s and all GLA 2016 AQFAs. Interviews were designed to target residents that might ordinarily miss out on environmental messaging, particularly amongst disproportionately affected groups or the digitally excluded. An online survey also allowed residents not involved in the focus groups to voice their concerns. 94% of people engaging via outreach saying that their views had never been consulted before (83%) or not much before (11%). 488 people gave

their views. Full details of the outcome of the community outreach consultation can be found in Appendix C.

4.3 Following this, an officer Air Quality Steering Group was established in January 2022 to monitor the implementation of the AQAP. The group consists of members of the following teams:

- Healthy Streets and Parking team
- Public Health
- Planning Policy
- Energy and Sustainability
- Employment Skills and Enterprise
- Communications
- Regulatory Services
- Environmental Strategy and Climate Change

4.4 Further to the steering group meetings, there were five action planning workshops for each of the five themes to go through the list of actions, allow each stakeholder to comment on the actions, and to provide insight on how to achieve them. These were held between September and October 2022 and included the steering group members as well as other relevant stakeholders such as members of the NWL NHS Integrated Care Board, Brent CVS, and TfL. These action planning workshops allowed for cross-group discussion on each of the actions. The outcomes of these discussions were then incorporated into the final list of air quality actions within the draft AQAP.

4.5 The contents of the draft AQAP were then shared with the GLA for comment, following approval on the content from the Lead Member on 30 January 2023.

4.6 Councillors were notified and invited to provide questions or comments on the draft AQAP at this point via the “All Councillor” email distribution list on 8 February 2023, prior to public consultation.

4.7 The draft AQAP was then subject to public consultation, following an Individual Cabinet Member Decision on 13 March 2023. An online survey was live for six weeks and was promoted as detailed in the consultation report in Appendix D. Pop-up events took place at a range of locations across the borough, along with presentations at community forums to inform the local community about the draft plan and signpost to the online survey.

4.8 In total over 400 people interacted with the engagement team during pop-up events and were informed about the draft AQAP and how to share their views. 92 people gave their views either online or on a paper questionnaire with the following headline views:

- 62% of people responded positively (saying “Love it” or “Like it”) to the Council’s vision statement around air quality
- 71% believe that Core Aim 1 - “Reduce Pollutions Concentrations” should be the main priority

- 57% thought that “Discourage unnecessary engine idling” would be the most impactful proposed action, followed by “Provide infrastructure to support walking and cycling” (56%)
- Overall, only 10% of people who gave their views expressed a negative opinion of the draft plan. 40% of people expressed a positive view, 41% said “it’s OK”, and 8% weren’t sure.

4.9 In response to the consultation, the key changes that have been made to the Air Quality Action Plan are:

- Changing the prioritisation of the actions to reflect resident priorities
- Adding a new action (CT12) Encourage walking and cycling in the borough by providing support to reflect the need to provide services to enable more walking and cycling
- Additional actions to work more closely with the Canal & River Trust

4.10 The GLA approved the post consultation version of the AQAP on 19 October 2023 with the addition of a target for action CT10 (emissions from deliveries).

## **5.0 Financial Considerations**

5.1 The AQAP will be delivered within existing budgets and funding structures where possible. Additional funds can be applied for when grant opportunities arise, such as through the Defra Air Quality Grant and Mayor’s Air Quality Fund. Appendix F details the actions in the plan and the funding for delivery, including an estimated cost over 5 years where possible.

## **6.0 Legal Considerations**

6.1 The Council has a statutory duty to comply with the requirements of the Environment Act 1995, as amended by Environment Act 2021. This states that all local authorities must publish an air quality action plan, working with Air Quality Partners, once they have declared an Air Quality Management Area and continue to review and assess local air quality until national targets are met.

6.2 Governance of this regime for London local authorities has been devolved to the Mayor. As a result, the council must demonstrate compliance with the London Local Air Quality Management (LLAQM) regime and provide regular updates regarding compliance with Air Quality Objectives to the London Mayor.

6.3 This AQAP is therefore a statutory document and has been produced as part of our duty to LLAQM. It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Objectives Part IV of the Environment Act 1995 (as amended by the Environment Act 2021) and relevant regulations made under that part and to meet the requirements of the London Local Air Quality Management statutory process.

## **7.0 Equality, Diversity & Inclusion (EDI) Considerations**

- 7.1 S149 of the Equality Act 2010 provides that the Council must have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic, and those who do not.
- 7.2 Inequalities in exposure to air pollution exist across the UK. Analysis has demonstrated that areas characterised by deprivation tend to pollute the least and yet are exposed to higher levels of pollution (Air Quality Management Resource Centre, 2019). Furthermore, vulnerable citizens (children, elderly or those in ill-health) are at greater risk of being harmed by poor air quality.
- 7.3 Projects linked to reducing local air pollution are critical to address these environmental and health inequalities.
- 7.4 Appendix G contains the Equalities Impact Assessment for the AQAP.
- 7.5 Following assessment, it is considered that, on balance, the significant benefits that the objectives and measures within the AQAP will bring, including those to protected characteristics, will significantly outweigh any disbenefits to these groups. However, where negative impacts have been identified, it is anticipated that these can be addressed, or mitigated, as projects and schemes are further developed. A requirement to engage closely with local communities, our partners and a wide range of stakeholders at all stages of project development will ensure this.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 The Air Quality Action Plan directly supports the Council's environmental objectives and climate emergency strategy.
- 8.2 Many of the sources of outdoor air pollution are also sources of carbon dioxide emissions. For example, using fossil fuels for power generation, industry, and transport are all major sources of both particulate matter, nitrogen dioxide and carbon dioxide. Therefore, tackling these sources for improvements in air quality will also complement the climate emergency strategy.

## **9.0 Communication Considerations**

- 9.1 Once the AQAP has been adopted, it will be published online. Relevant stakeholders will be notified via a communications plan, included in Appendix H.

### Related document(s) for reference

- Individual Cabinet Member Decision report - 13 March 2023 Draft Air Quality Action Plan (AQAP) 2023-2027 Consultation

**Report sign off:**

***Peter Gadsdon***

Corporate Director of Resident Services