

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Brent Air Quality Action Plan 2023-2027
DEPARTMENT:	Resident Services
TEAM:	Healthy Streets and Parking
LEAD OFFICER:	Lauren Salisbury – Air Quality Policy and Project Officer
DATE:	20/09/2023

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Brent's Air Quality Action Plan (2023– 2027) (AQAP) outlines thirty-seven measures the Council will undertake to reduce levels of two key air pollutants, nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}), known to be harmful to health.

Progress has been made in reducing air pollution concentrations across the borough for the key pollutants (NO₂, PM₁₀, and PM_{2.5}). However, some areas in the borough are still exceeding the legal limits for NO₂ and the majority of the borough exceeds the new PM_{2.5} limit set in 2023. Moreover, pollution levels across the whole borough are higher than the World Health Organisation (WHO) guidelines.

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.

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.

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).

2. Who may be affected by this policy or proposal?

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, NO₂ and PM_{2.5} responsible for over 8% of all deaths in the borough¹. 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.

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
- People of black or mixed ethnicities who are more likely to live in the most polluted places

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 PM_{2.5} concentrations have a disproportionately white population. Furthermore, the inequalities in exposure to air pollution experienced between ethnic groups are much more pronounced in Outer London boroughs.

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 2019².

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

² [Greater London Authority air quality exposure and inequalities study \(2023\)](#)

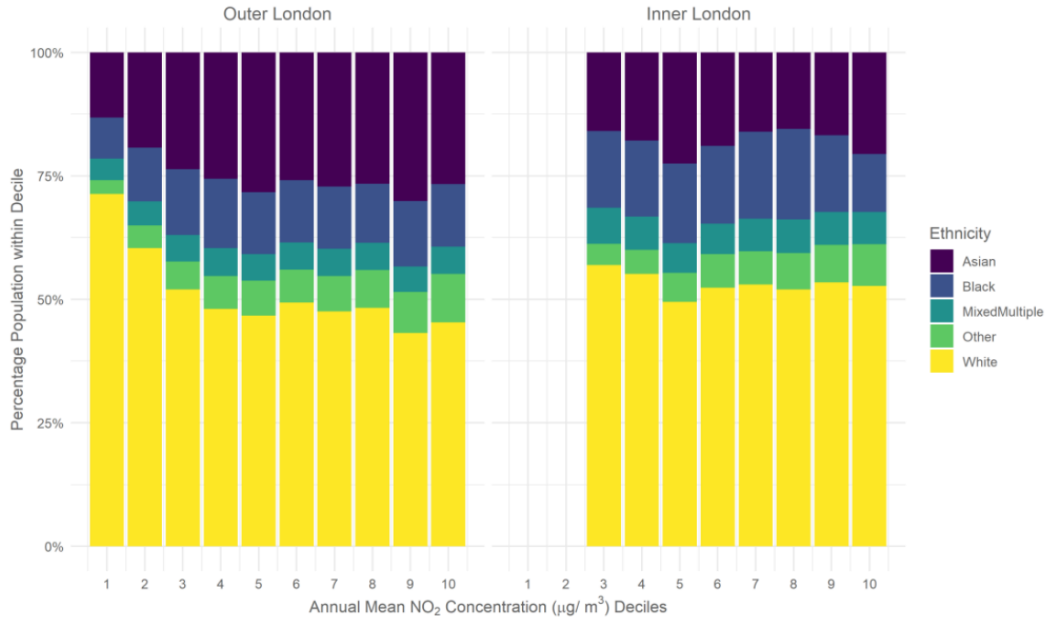


Figure 1. Percentage of population of each ethnicity group by NO₂ Concentration deciles for Outer and Inner London in 2019

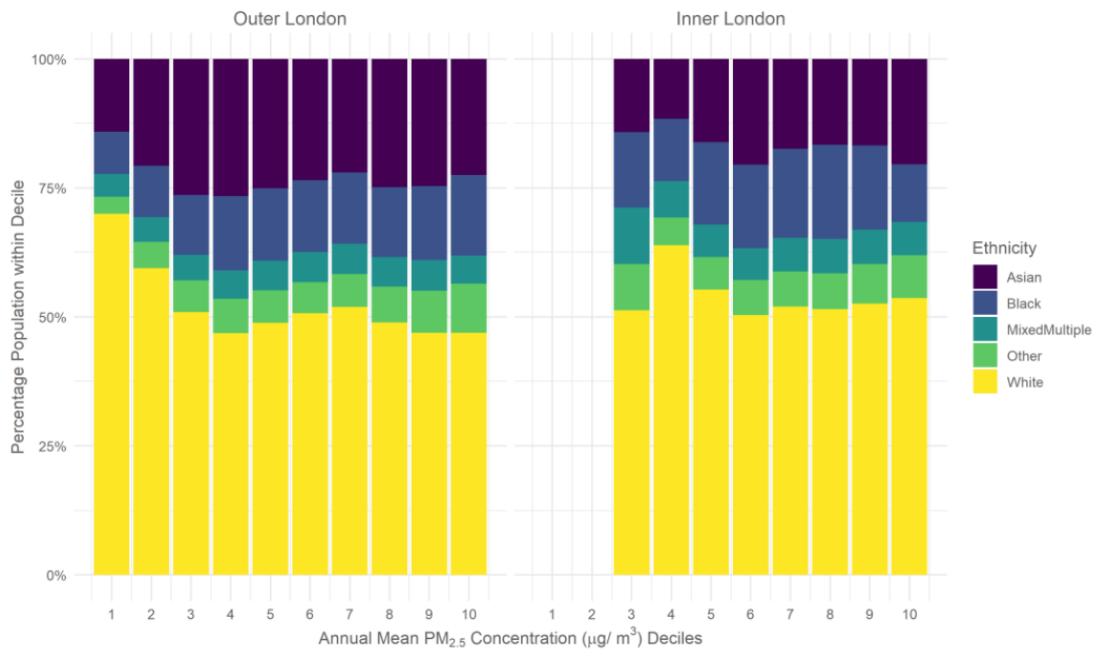


Figure 2. Percentage of population of each ethnicity group by PM_{2.5} concentration deciles for Outer and Inner London in 2019

There are over 18,000 people who suffer with asthma in Brent, almost 2,500 of whom are children. 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.

In addition to residents, developers and businesses will be impacted by the actions in the AQAP.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The Council is required by the Public Sector Equality Duty to have due regard to the need to address inequalities and a number of aspects are particularly relevant to the AQAP. These include a requirement to:

- eliminate discrimination;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

The AQAP aims to reduce inequalities by committing to tackle environmental injustices resulting from those who pollute the least often being exposed to higher levels of pollution.

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 PM_{2.5} concentrations have a disproportionately white population. Furthermore, the inequalities in exposure to air pollution experienced between ethnic groups are much more pronounced in Outer London boroughs.

That said, it is clear that some of the actions contained within the AQAP will not benefit all groups equally, particularly where they are targeted at addressing a specific issue or a problem that affects a particular group. For example, actions within the Cleaner Transport theme are supporting schemes to reduce traffic and facilitate healthy, sustainable travel, such as the introduction of cycle lanes or removal of on-street parking. This may form an obstacle to certain groups, such as the elderly or disabled, particularly if they do not have the opportunity or ability to travel by means other than car. Such issues would need to be carefully considered when designing, consulting, and building such schemes, with appropriate mitigation taken where specific concerns cannot be fully addressed.

For the most part, the various aims, objectives, and measures outlined in the AQAP seek to address a wide range of often interconnecting issues, whilst looking to enhance the environment for those living and working in, or visiting, Brent. On balance it is anticipated that the benefits these improvements will bring, including to those with protected characteristics, will significantly outweigh the disbenefits. Central to achieving this will be the need to continue engaging closely with local communities, our partners, and a wide range of stakeholders as actions are delivered over the next 5 years.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age	x		
Sex	x		
Race	x		
Disability *	x		
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity	x		
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

- Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The AQAP looks to remedy poor air quality, which continues to blight some of our most vulnerable communities. The Action Plan looks to make improvements across a range of areas, including poor health and social inequalities, climate change and the shaping of the built environment.

Air Quality

- The Council has a legal duty to reduce pollution and is committed to meeting World Health Organisation (WHO) targets on air quality by 2030 in line with the Mayor of London for PM2.5. Large parts of the borough are currently designated as an Air Quality Management Area (AQMA) and Air Quality Focus Areas (AQFAs).
- Air quality has a particularly detrimental impact on children, affecting lung development which makes them more susceptible to infection and disease as they grow. They are also more vulnerable to polluted air than adults. Older people who may be more susceptible due to existing illnesses, and pregnant women, are also more vulnerable. People are also twice as likely to be affected by pollution in areas of higher deprivation as these areas have poorer air quality.

Health and Wellbeing

- Poor health and high levels of inactivity are two of the major challenges facing a large number of Brent’s residents. The borough is ranked as the fourth most deprived local authority in London and in 2016 it was named as the fattest London borough. Currently, around 55% of Brent’s adult population (aged 18+) are classified as overweight or obese, whilst almost one in three children are classed as obese by the time they leave primary school – way above the London and England average. Brent is also the 4th most inactive borough in London, with around 3 out of every 10 people in the borough currently doing less than 30 minutes of activity a week.
- There are over 18,000 people who suffer with asthma in Brent, almost 2,500 of whom are children. 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

Climate Change

- In 2019 the Council declared a climate and ecological emergency, stating the need to try and achieve carbon neutrality by 2030. A key priority is to bring about as close as possible to zero the number of petrol and diesel road journeys made in the borough; and to increase significantly journeys made by sustainable modes of travel, such as cycling, walking or public transport. In addition, reducing emissions from buildings and developments.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	<p>Elderly people and children are more vulnerable to the impacts of pollution. The AQAP contains measures to reduce this impact through better communications and partnership working, working with NHS Integrated Care Board, schools, nurseries, care homes, and GPs.</p>
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	<p>Additionally, with road transport being a dominant contributor to emissions, the theme Cleaner Transport aims to support sustainable transport and reduce car usage. With around 55% of the adult population in Brent classified as overweight or obese, and with almost one in three children in the borough classed as obese by the time they leave primary school, measures to promote healthy, active travel will positively benefit young and old.</p> <p>However, schemes to reduce the use of private cars and re-purpose the kerbside to provide for other uses, such as cycle parking may result in a slight negative impact on this group. This is expected to be outweighed by broad health and accessibility benefits delivered by reducing air pollution. It is anticipated that this may largely be mitigated within the design of schemes.</p>
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DISABILITY

Details of impacts identified	<p>Those with some underlying health conditions are more likely have worse health outcomes as a result of air pollution. The AQAP commits to working with health practitioners and schools to ensure air pollution messaging and alerts get to those most vulnerable in our communities.</p>
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RACE

Details of impacts identified	<p>Brent is the second most ethnically diverse borough in London - 64% of the local population is from Black, Asian, and other minority groups and over 149 different languages are spoken. However, BAME groups are typically over-represented in indices of deprivation and more likely to be exposed to poor air quality and health inequalities arising from this.</p> <p>Areas in London with the lowest NO₂ and PM_{2.5} concentrations have a disproportionately white population. Furthermore, the inequalities in exposure to air pollution experienced between ethnic groups are much more pronounced in Outer London boroughs.</p> <p>Air Quality Focus Areas have been identified through identifying areas with high levels of pollution, high levels of population exposure and took into consideration Indices of Deprivation. AQGAs are where action will be taken first, meaning that we will take action where the most vulnerable in our communities are being exposed to the worst levels of pollution.</p>
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SEX

Details of impacts identified	<p>A key theme in the AQAP is to reduce emissions from road transport by encouraging walking and cycling.</p> <p>Women and girls are often less likely to walk and cycle than their male counterparts, with concerns over confidence, road safety, lack of adequate facilities and personal security often cited as key reasons for this. The provision of accessible, well connected, and safe/secure walking and cycling routes, along with road safety education/cycle training will benefit all groups, but particularly women who may feel more vulnerable.</p>
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SEXUAL ORIENTATION

Details of impacts identified	<p>A key theme in the AQAP is to reduce emissions from road transport by encouraging walking and cycling.</p> <p>Members of the LGBT community often find personal safety and security to be a concern, especially around road safety and personal security. The provision of accessible, well connected, and safe/secure walking and cycling routes, along with road safety education/cycle training will benefit all groups.</p>
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PREGANCY AND MATERNITY

Details of impacts identified	<p>Pregnant women are more vulnerable to the impacts of air pollution. Therefore, measures taken to improve AQ will positively impact this group.</p>
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RELIGION OR BELIEF

Details of impacts identified	<p>No impact identified</p>
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GENDER REASSIGNMENT

Details of impacts identified	<p>A key theme in the AQAP is to reduce emissions from road transport by encouraging walking and cycling.</p> <p>People who are going or have gone through gender reassignment, often find personal safety and security to be a concern, specifically around road safety, lack of adequate facilities and personal security. The provision of accessible, well connected, and safe/secure walking and cycling routes, along with road safety education/cycle training will benefit all groups.</p>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively).</p>
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3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

At the outset of the AQAP development process in October 2021, extensive 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.

The draft AQAP was then subject to public consultation. An online survey was live for six weeks and was promoted as detailed in the consultation report. 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.

4In 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.

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

5. Please detail any areas identified as requiring further data or detailed analysis.

The measures contained within the AQAP will form the basis of future projects. Where relevant individual schemes will need to consider needs for Brent residents and may be subject to EIA screening and/or public consultation. Should there be any aspects of schemes that have potential to disproportionately or negatively impact on individuals or groups with protected characteristics, then they can be addressed following the public consultation stage of the scheme.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

It is anticipated that through ongoing engagement with a range of groups/stakeholders and adherence to relevant guidance/standards, at all stages of project/scheme development, will ensure any negative impacts are removed, or mitigated.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Monitoring of the delivery of the Air Quality Action Plan will be undertaken by the Healthy Streets and Parking service, with regular meetings to be held with those responsible for the delivery of the various projects and initiatives outlined, via an Air Quality Steering Group. Progress towards the various targets and indicators reported each year in the Annual Status Report which gets submitted to the GLA and Defra.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Brent's Air Quality Action Plan (2023– 2027) outlines thirty-seven measures the Council will undertake to reduce levels of two key air pollutants, nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}), known to be harmful to health. It has the overarching aim of reducing local emissions and by raising awareness of the health impacts of poor air quality with residents. For both aims, there is a commitment to focus attention on areas where pollution is worst, areas where deprivation is worst and making sure those most vulnerable to air pollution are receiving relevant health messaging.

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 the disbenefits to these groups. However, where negative impacts are 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.

On this basis, it is recommended that the approach contained within the AQAP for delivering improvements to air quality in the borough is adopted but is kept under regular review.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Improve involvement and consultation with different equality groups	More regular dialogue/engagement with the community will help ensure key issues/concerns are taken on board when developing/ implementing schemes to improve air quality. This will include keeping dialogue open about the impact of sustainable travel for those	Will be project specific	Ongoing

	from lower socio economic backgrounds and for those who are less mobile		
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SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Lauren Salisbury – Air Quality Policy and Project Officer
REVIEWING OFFICER:	Angela Chaudry – Strategy Lead Equalities
HEAD OF SERVICE / Operational Director:	Sandor Fazekas – Head of Healthy Streets and Parking 27.10.23