

London Borough of Brent
Air Quality Action Plan 2017 - 2022

Contents

1 Foreword 2

2 Introduction 3

 Current Air Quality in Brent 3

3 Brent - A Cleaner Air Borough 4

4 Planning for Air Quality Action 4

 Brent AQAP: What’s new? 4

 Air Quality Action Areas 4

 Revised Action Plan Measures 6

 Emissions from Developments and Buildings 6

 Public Health and Community Engagement: 6

 Exposure Reduction Measures 7

 Delivery Servicing and Freight: 7

 Cleaner Transport: 7

 Appendix 1: Rationale for selection of AQAA 10

 Appendix 2: AQAP Actions 12

1 Foreword

A Breath of Fresh Air – the new action plan for air quality improvement in Brent

Brent council acknowledges the impact of poor air quality on health and the need for action to reduce or eliminate air pollution where possible. In Brent it is estimated that 200 premature deaths occur each year which are directly attributable to air pollution as well as further unquantified premature deaths where air quality is a factor. We accept air quality in Brent is poor and recognise significant intervention is required to improve local air quality for all. We have made some progress but accept that further work is needed to meet this challenge. Our air quality action plan demonstrates we are taking this issue seriously and will endeavour to tackle air pollution at source or reduce exposure where this is not possible.

We will demonstrate our leadership by exploring options for low emission neighbourhoods, promotion of low emission vehicles and fuels where possible, reduce pollutant emissions from our buildings and vehicles and develop meaningful partnerships with others to get the most out of our air quality action measures.

We recognise air pollution as a shared problem and everyone must play their part to commit to continue to work with our communities to achieve air quality improvement. As we understand more about air pollution and the impact on health, we want to empower our residents to make informed choices about their options for travel and participate in decisions about air quality in the areas they live and work in. We must commit to safeguarding those at highest risk to provide additional information and limit or prohibit the development of areas where air quality is likely to be made worse.

Not all air quality improvements can be delivered directly by our actions and so we will develop partnerships with other Local Authorities, the London Mayor, and other agencies where appropriate to maximise resources where we can and realise wider air quality benefits from our actions.

We will commit to keeping this air quality action plan under review and will continue to identify new opportunities for air quality action in response to changes in legislation or local air quality as the need arises.

Our ultimate aim is to secure clean air for all especially for those at greatest risk or in the worst affected areas in the borough. We accept that this is likely to be a challenge to fulfil, but commit to investing in air quality action for improvement now and in the future. .

Signed

..... Lead Cabinet Member

..... Director of public Health

..... Head of Transportation

2 Introduction

Current Air Quality in Brent

The link between poor health and air pollution is well established and for the last 15 years the council has been taking action to reduce pollution in the borough. Brent meets all national air quality targets except for two pollutants - Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). Air quality outside of our air quality management area has not worsened since 2006 and so no new management areas for air quality action are proposed.

Air quality in Brent has been improving and this downward trend is likely to continue for the future, but the council will need to take action if we are to meet national targets set for NO₂. Nitrogen dioxide and particulates therefore remain the focus of the new plan.

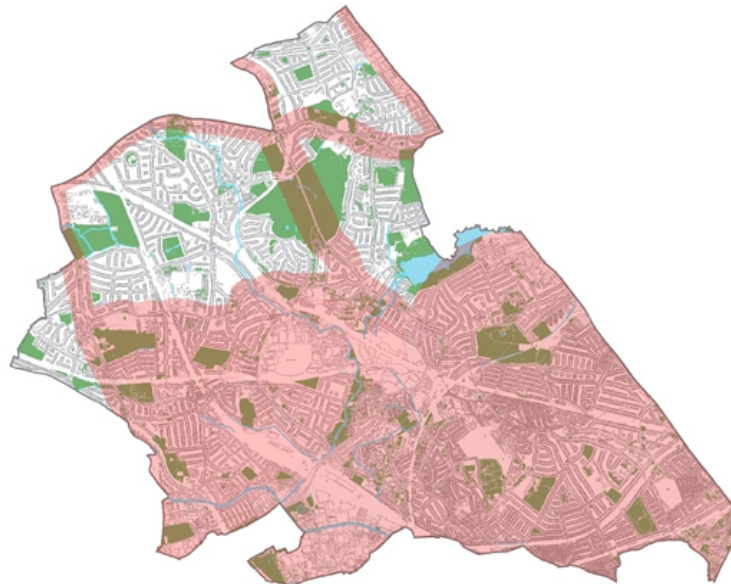


Figure 1: London Borough of Brent's current Air quality Management Area

Any improvement in air quality will benefit everyone. However, some areas of the Borough are more likely to be affected by poor air quality than others as the wider problems of poverty; deprivation and general poor health make people more vulnerable to the effects of pollution. This contributes to an almost 9-year difference in life expectancy between the most affluent and least affluent wards in the Borough. The council is committed to reducing this gap.

The largest contributors to poor air quality in Brent are local energy generation, construction and road transport. Action plan measures will focus mainly on reduction of pollution from these sources.

3 Brent - A Cleaner Air Borough

Cleaner Air Borough (CAB) Status was established by the Greater London Authority (GLA) as a method for identifying and rewarding boroughs able to demonstrate good or best practice for air quality action. Councils must demonstrate excellence against the following key criteria:

- Political Leadership;
- Taking Action;
- Leading by Example;
- Using the Planning System;
- Integrating air quality into the public health system; and
- Informing the public

Brent attained CAB status in 2011 and will seek to demonstrate continued compliance with the key criteria, by implementation of air quality action plan measures and statutory duties.

4 Planning for Air Quality Action

Our draft Air Quality Action Plan (AQAP) states what the council will do to improve air quality for the next five years and describes how the council will act to reduce the pollution from transport, construction and local industry. The council will focus on measures to reduce or disincentivise car use, minimise car ownership in new development. We will also seek to use local policies to discourage actions likely to contribute to wider environmental impacts as well as poor air quality such as paving of front gardens.

It also describes what we will do to help those who visit, live or work in Brent to understand the action they can take to improve local air quality. The AQAP also sets out our air quality policy and describes targeted action for partnership work to achieve the greatest air quality benefits.

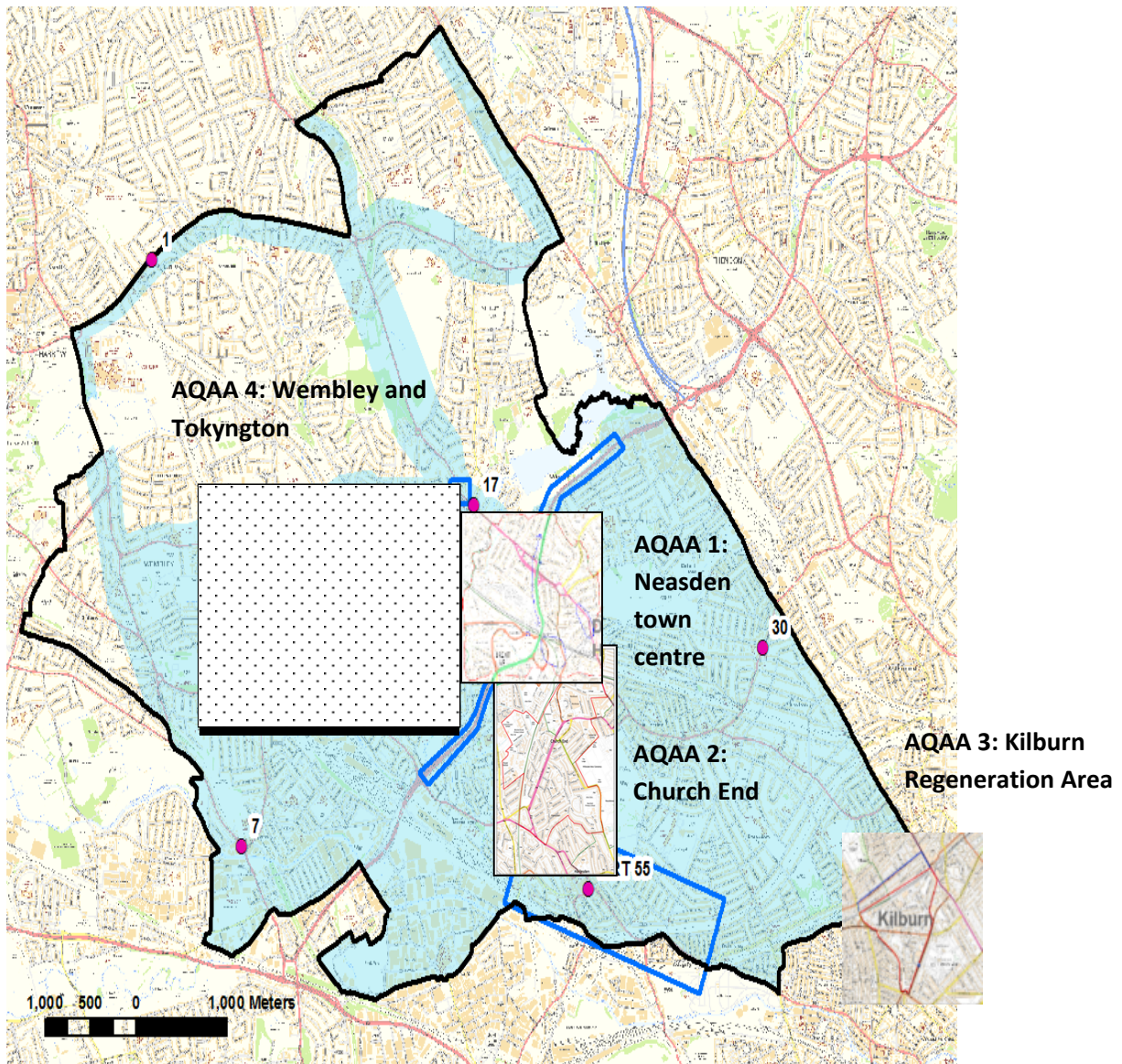
Brent must undertake an annual review of air quality and will report on AQAP progress and Brent's "Cleaner Air Borough Status" every July. The AQAP will be reviewed in autumn 2021.

The Air Quality Management Area (AQMA) will be reviewed in 2020 to coincide with an air quality support package update to be issued by the GLA.

Brent AQAP: What's new?

Air Quality Action Areas

The revised action plan (set out in Appendix 1) includes the creation of four Air Quality Action Areas (AQAA) or hotspots, as Neasden town centre, Church End, the Kilburn Regeneration Area, and Wembley and Tokyngton. These areas were selected based on traffic volumes and levels of traffic emissions, and have been identified as areas of planned development and aligned with the priority areas identified in the current Borough Plan. Brent will develop strategic policies and localised focussed air quality measures in these areas.



A specific action plan will be created for each area and will include action to address the main sources of pollution.

They will

- provide extra assistance and support to ensure that all schools within the AQAA have and use school travel plans, reducing vehicle use associated with schools, regularly reviewing targets for reducing air pollution and establishing programmes for raising awareness;
- provide assistance and support to businesses within the AQAA with large fleets to have and utilise travel plans. The council and businesses will agree targets for emission reductions;
- Identify possible Low Emission Neighbourhoods in each AQAA and draft implementation plans for areas within each;
- Consider these sites within these areas as highest priority for public realm improvements (such as additional green infrastructure) especially where there are

those at highest risk or the most susceptible are located such as schools, residential properties and hospitals;

- Engage the local community in AQAAs using ward-focussed air quality action to educate and raise awareness about local air quality; - working with communities and public health professionals to protect and inform the most vulnerable;

Targeting action in the AQAAs does not mean that air quality action will not be prioritised in the remainder of the Borough. The air quality plan will include action for the entire air quality management area as well as the four hotspots highlighted above. In addition, air quality improvement in one area will lead to air quality benefit for all, since air pollution is not restricted to ward or borough boundaries.

Brent will target improved air quality by working with partner agencies to reduce congestion and emissions from transport on key routes in the Air Quality Action Areas. This will be completed by reviewing low emission planning guidance for new development sites; leading by example by reducing emissions from our own borough fleet, and developing policies in parking and residential zones to increase the uptake of ultra-low emission vehicles.

Revised Action Plan Measures

The Air Quality Matrix outlines the 24 actions Brent will implement to deliver air quality improvement and are split into six themes which focus on measures to reduce pollutant emissions from key sources:

Emissions from Developments and Buildings

Building works are a key source of pollution and as the council plans to build over 22,000 new homes by 2026, this increase is likely to give rise to a lot more pollution in the short, medium, and long term unless properly controlled.

Emissions from local energy generation account for about 15% of the NO_x emissions across London and are also a significant source of air pollution.

The Council will also reduce pollutant emissions generated by our use of heating, lighting and transport and encourage local businesses to follow our lead. We will use existing powers available to us to control and limit emissions from new and existing sources of pollutant emissions, by the following actions:

- Enforcing Combined Heat and Power and biomass air quality policies
- Using the planning system to ensure new development does not negatively impact on local air quality
- Ensure that Smoke Control Zones are fully promoted and enforced
- Ensure emissions from construction are minimised
- Reduce emissions to air from the burning of waste or from waste facilities using regulatory powers
- Promoting energy efficiency retrofitting projects in workplaces and homes
- Undertake energy efficient improvements in council buildings.

Public Health and Community Engagement:

Educating the community about air pollution and what they can do to improve air quality will drive behavioural change to lower emissions, reduce exposure to air pollution and allow them to choose more environmentally-friendly travel options. We understand the need to provide information and updates regarding local air pollution to residents and will ensure that we better engage them via a range of media. We will ensure this includes the provision of simple tips and useful advice about measures our community can take to contribute to local air quality improvements.

The council will encourage residents to consider alternatives to car use, particularly encouraging the use of sustainable travel such as walking and cycling and promoting the additional positive health benefits of increased physical activity. We will also take measures to educate our community to reduce their impacts on the local environment from vehicle idling.

The council will:

- Promote air pollution forecasting and provide better access to local air pollution information
- Promote route planner tools to assist residents to make informed choices about travel
- Ensure schools join an accredited travel planning programme with clear goals for reducing impacts on local air pollution.
- Discourage unnecessary idling by taxis, coaches and other vehicles.

Exposure Reduction Measures:

Green Space in Brent is below the 15% London average and many Brent residents have little or no access to green or open space. Trees form an integral part of the urban environment and the air quality management area is recognised as generally lacking tree cover. We seek to address this by increasing planting in the Borough where we can, contributing more generally to the Councils' commitment for improving health and wellbeing and tackling health inequalities. In addition, the Council seeks to improve the accessibility of key routes to encourage walking and to make the street and public transport viable and attractive travel options.

The Council will: endeavour to

- Identify and develop Low Emission Neighbourhoods where feasible.
- Targeted enhancement of green infrastructure at appropriate locations where exposure to poor air quality is high.

Delivery Servicing and Freight:

Vehicles delivering goods and services are usually light and heavy duty diesel-fuelled vehicles with high primary NO₂ emissions. This type of vehicle is a significant contributor to local air pollution and the council will investigate the potential emissions reductions possible

by changing the way local deliveries are made. Consideration will be given to changing delivery times to reduce contributions to local congestion and incentives for deliveries made using low emission vehicles. .

To limit the impact of local deliveries the council will also:

- Update Procurement policies to ensure that services the council uses are compliant with our air quality objectives
- Investigate the feasibility of re-organisation of freight to support centralised deliveries where possible,
- Investigate the feasibility of virtual Loading Bays and priority loading for ultra-low emission delivery vehicles

Cleaner Transport:

Traffic and transport is the largest contributor to air pollution in Brent, accounting for at least 52% of emissions in the borough. Diesel vehicles in particular contribute local particulates such as PM₁₀ and PM_{2.5} which are known to be significant contributors to ill health, Measures to reduce their impacts remain our highest priority for action, and a reduction in vehicle use in favour of active travel will be vigorously promoted using initiatives such as Walk and Stride. Progress with these initiatives will be rigorously monitored via our Cycling and Walking Strategies.

The council will also use local action days to promote car free initiatives and educate the community about air quality impacts of local measures. This will ensure we maintain a local focus on air quality action with the aim of securing long-term behavioural change.

The council will also encourage to the use of public transport or car clubs instead of passenger vehicles to reduce the number of vehicles on Brent roads and reduce impacts of congestion,

The current tiered parking charging scheme favours small and low (or zero) emission cars and promotes more environmentally-friendly choices of vehicle, or modal shift to non-car modes of travel. The Council will continue to explore options for dis-incentivising car use, promoting the take up of low emission vehicles where possible and will keep under continual review opportunities for adopting new technologies which aim to reduce vehicle emission.

Our council fleet includes light and heavy duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO₂ emissions. We will investigate options for further reduction of fleet vehicles and accelerate the uptake of cleaner vehicles where their use is essential.

The council will:

- Increase the number of low emission vehicles in the boroughs' fleet which use alternative fuels.
- Accelerate uptake of new Euro VI vehicles in borough fleet.
- Encourage Car Clubs to introduce low emission and alternative fuel vehicles into the car club fleet where possible.
- Promote 'action days' to encourage behaviour change and reduce pollution in priority areas.

- Support the installation of on-street electric vehicle charge points throughout Brent.
- Support the take-up of electric taxis and commercial vehicles.
- Rigorously monitor the impacts of the Cycling and Walking Strategy

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Appendix 1: Rationale for selection of AQAA

Air Quality Action Area 1: Neasden town centre				
Includes the site of our AQ monitoring station (IKEA)	This area incorporates some of the North circular a critical route through the Borough and significant source of pollution	It is in very close proximity to the air quality focus area which incorporates Dudden Hill Lane.	Includes Neasden Goods Yard – a significant source of PM10, and other sources of industrial PM in this location	Includes Neasden Town Centre – location earmarked for Public Realm Improvement so may offer the opportunity for future joint work and funding.
Air Quality Action Area 2: Church End				
Promoted for mixed use regeneration, including 800 new homes by 2026 supported by additional infrastructure such as education facilities, new health provision and space for recreation and play	Close proximity to AQ Focus Area	Includes/ very close to Harlesden Town Centre, another location for AQ monitoring station	Includes a range of uses power station, industrial areas, residential, green space and canal	On borough boundary so will consider potential for cross-borough work and partnership.
Air Quality Action Area 3: Kilburn Regeneration Area				
Area prioritised for development of 2600 homes to 2026. Major regeneration area, close location to Kilburn High Road – key town centre	Some work being undertaken in this area Cambridge Gardens, Brondesbury road with TfL to improve/ escalate the provision of cleaner buses (hybrid)	Location for HS2 at borough edge – including the vent shaft for HS2, expect lots local HGV traffic from vehicles in future, plus Opportunity for joint work or initiatives with Camden and / or Westminster	Proposal for local energy centre	Council in the process of assisting local residents to undertake their own monitoring.

Air Quality Action Area 4: Wembley and Tokyngton

<p>This area incorporates Wembley High Road – key town centre</p>	<p>Includes 3 stations – Wembley Park, Wembley Stadium and Wembley Central</p>	<p>Includes 2 key regeneration areas – Wembley Regeneration area around the stadium and Wembley Triangle</p>	<p>Is in close proximity to large developments including Copland School Development and other residential development along the High Road.</p>	
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Appendix 2: AQAP Actions

Action ID	Action	Detail	By	Output
Emissions from new Developments and Buildings				
1	Ensure emissions from construction are minimised (Borough wide)	<p>Ensure enforcement of Non Road Mobile Machinery (NRMM) air quality zone</p> <p>The council will work in partnership with 10 other boroughs as part of the London Low Emission Construction Partnership ensure compliance with emissions standards in zone</p> <p>The council will require developers to comply with legislation and planning conditions to control on site emissions utilising construction method statements</p>	<p>Annual Review from 2016/17</p> <p>Annual Review from 2017/18</p> <p>Annual Review from 2016/17</p>	<p>Number of construction sites inspected for NRMM compliance</p> <p>% Emissions reduction achieved on major sites within Brent NRMM Low emission zone.</p> <p>Number of nuisance complaints investigated and action taken</p>
2	Use the planning system to ensure new development does not negatively impact on air quality (Borough wide)	<p>Require developers to undertake air quality assessments to assess the potential impacts of new development</p> <p>Review all new planning applications for potential air quality impacts and implement controls to limit impacts – e.g use of robust construction method statements, enforcement of planning conditions</p> <p>Require all new development to be air quality neutral or better</p>	Annual Review from 2016/17	Number of AQAs and applications reviewed and action taken
4	Enforce Combined Heat and Power and biomass air quality policies	The council will ensure that all new development use low and ultra-low emission boilers and the	2016/17 Annual	Create register of CHP plant within the borough Number of new

Action ID	Action	Detail	By	Output
	(Borough wide)	all energy generating plant achieve the highest emission standards. The council will need to develop a register of CHP installations within Brent to support this.	Review from 2017/18	developments with low emission boilers installed % Emissions reduction achieved
5	Ensure that Smoke Control Zones are fully promoted and enforced (Borough wide)	The whole of Brent is a smoke control zone and the council controls the types of fuels that can be used in commercial and domestic buildings.. This will be met by provision of guidance to non-compliant building owners and enforcement of Clean Air Act	Ongoing	100% response rate for Smoke Control Area breaches
6	Reduce emissions to air from the burning of waste or from waste facilities using regulatory powers (Borough wide)		Annual Review from 2016/17	Number of nuisance complaints investigated and action taken
7	Promoting energy efficiency retrofitting projects in workplaces and homes Trial in Air Quality Action Areas	The council will signpost commercial and residential building owners to initiatives such as the GLA-led RE:NEW and RE:FIT programmes to replace old boilers /top-up lost insulation in combination with other energy conservation measures.	Annual Review from 2016/17	Number signed up to each programme Number boilers replaced (and % emissions reduction achieved)
8	Undertake energy efficient improvements in council buildings	To reduce carbon emissions associated with councils' estate and associated operations	2020/2021	30% emission reduction for council buildings
Public Health and Community Engagement				
9	Business Engagement	Ensure all installations regulated under the Environmental Permitting Regulations comply with pollution emission controls	Annual review	100% inspections completed annually

Action ID	Action	Detail	By	Output
		Work with new travel plans Investigate potential for air quality action for large and medium-sized employers in strategic employment areas	2017/18	Feasibility study
10	Promotion of availability of air pollution forecasting and route planner tools	Promote the use of AirText messaging service and similar to empower community to consider alternative travel choices on high pollution days Promote the use of apps such as Walkit to permit the community to select alternative, low-pollution routes for walking/ cycling and make informed travel choices	Annual review	Increased number of users for airText service in Brent
11	Ensure schools to join the TfL STARS accredited travel planning programme	Ensure all Brent schools to have travel plan Support schools with travel plans to achieve higher levels of STARS accreditation or maintain existing gold accreditation Include provision of information in guidance pack	2017/2018 2020/2021	100% of all schools have travel plan 40% of schools with travel plan attained Gold Status
Delivery Servicing and Freight				
13	Update Procurement policies	to ensure sustainable logistical measures are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria)	2017/2018	Updated policies published Compliance checks
14	Investigate the feasibility of re-organisation of freight to support consolidation (or micro-consolidation) of deliveries,	by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these	2017/18	Feasibility study

Action ID	Action	Detail	By	Output
15	Investigate the feasibility of virtual Loading Bays and priority loading for ultra-low emission delivery vehicles		2018/19	Feasibility study
Exposure Reduction Measures				
16	Identify and develop Low Emission Neighbourhoods where feasible		Annual Review from 2016/17	(likely to be incorporated into wider public realm projects so potentially 5 year implementation/ lead time)
17	Targeted enhancement of green infrastructure at locations where exposure to poor air quality is high	Install physical or green barriers Increase tree planting	Annual Review from 2016/17	
Cleaner Transport				
18	Increasing the number of low emission vehicles in the boroughs' fleet which use alternative fuels	BTS and fleet upgrade or replacement – shared resource with Harrow	2017/18	Number new / upgraded vehicles in use
19	Accelerate uptake of new Euro VI vehicles in borough fleet		2017/18	Number of new vehicles in council fleet
20	Discouraging unnecessary idling by taxis, coaches and other vehicles	Implementation of idling vehicle campaigns at taxi ranks, bus stands and schools Enforcement of anti-idling regulations via issue of warnings and fixed penalty notices for persistent offenders Revisit idling campaigns at key transport hubs and focus areas	2016/17 2017/18	Evaluation of idling and local impacts via survey, successful implementation of travel plans and spot check vehicle counts
21	Encourage Car Clubs to introduce low emission and alternative fuel vehicles into the car club fleet		2020/21	Number car clubs using low emission and alternative fuel vehicles against baseline established 2016/17

Action ID	Action	Detail	By	Output
22	Promoting 'action days' to encourage behaviour change and reduce pollution in priority areas.	Council currently promotes low emission days via initiatives such as Walk on Wednesdays for schools and Play Streets. Seek to expand this programme for consideration in AQAAAs to be implemented as part of ongoing programme.	2017/18	Number of days implemented
23	Support the installation of on-street electric vehicle charge points throughout Brent		2020/21	Number of electric vehicle charge points installed
24	Support the take-up of electric taxis and commercial vehicles.	Investigate the feasibility of installation of rapid chargers for electric vehicles Identify locations in the borough appropriate for TfL to install rapid chargers for electric vehicles (ECVPs)	2017/18 Annual review to 2020/21	Publication of feasibility report including list of potential locations for future EVCPs and target set for installation Number of rapid chargers installed reviewed annually