LSx
London Sustainability Exchange

Response to the London Borough of Brent's Air Quality Action Plan (2017-2022)

4/12/2017



Introduction

London Sustainability Exchange is a 'think and do' charity which creates collaborators that address the complex barriers to a sustainable London. Our projects provide action-based community development and research to develop, and in turn share, the lessons from our work across London, and most importantly, influence London's policies for a sustainable future.

Our work and insights will provide valuable information that can contribute to the engagement of local groups in consultations. Through our work in London's diverse communities, we have identified the measures for successfully engaging people in change programmes. These will be essential to delivering messages throughout the myriad of communities for creating cleaner air in London.

Our response builds on LSx's extensive experience of delivering behaviour change programme of work, aimed at improving air quality and public health across London. The programme includes Cleaner Air 4 Communities, Cleaner Air 4 Schools, Well London and other projects tackling wider issues such as health and well-being. The purpose of this consultation was to uncover what Brent residents view is on air pollution and the Air Quality Action Plan 2017-2022 set forth by the council.

Methodology

Our response to this consultation was directly informed by a focus group that was held on the 27th January 2017 at 'Community Health Action Trust' headquarters in Willesden, NW10 2JJ. Our aim was to reach groups that would people that would often miss out on environmental messages. Numerous people from a wide and diverse background were contacted through telephone interviews, ranging from 20 to 35 minute long conversations. We also prepared an online survey and circulated to residents in the London Borough of Brent. Our respondents ranged from 25 to 65 years of age, with the majority (65%) being between the age of 37-50.

Background

An estimated 9,416 Londoners a year die prematurely from causes related to air pollution. Around 200 of those are residents of the London Borough of Brent. In September 2016 a new World Health Organization (WHO) air quality model confirms that 92% of the world's population lives in places where air quality levels exceed WHO limits. In 2012, it estimated that 6.5 million deaths (11.6% of all global deaths) were associated with indoor and outdoor air pollution together. Air pollution is a challenge of enormous proportions and multiple dimensions (political, economic etc) and it is imperative that we all take the right action now.

Transport is a key contributor to London's CO_2 emissions (21%), NOx emissions (63%), PM2.5, and PM10 (52%) in London. The Department of Transport report in 2015 forecasted over the next three decades to be a 25-42% growth in car ownership (not necessarily electric) and 19-55% growth in miles driven. The 1995 Environment Act and UK Air Quality Strategy set domestic annual mean Air Quality Objective for NO_2 of 40µg/m^3 to be achieved by 2005. It was evident by 2004 that this was unlikely to be met, as concentrations were not coming down as initially predicted. For the last couple years London continues to breach its annual pollution limit within days of the New Year. Big changes are required in order to make a big difference.

Key Findings

The key findings that came out of our discussion with Brent residents were:

- **School children being exposed to high level of pollutants;**
- **The lack of safe cycling routes;**
- **Idling;**
- **Lack of awareness regarding sources of pollutants (eg. Boilers);**
- **Lack of knowledge was to what Low Emission Neighborhoods constitute;**
- **A lack of discussion and action on the topic of diesel vehicles.**

What was highlighted was the acknowledgement that there is a lot of traffic going through Brent that is from outside the Borough. Hence an Air Quality action plan aimed only at residents of Brent will unlikely tackle a big proportion of pollution. There was an acknowledgement also that boroughs are not properly resources to tackle this huge issue, and that actions are limited within the context of national policies. What follows is a list of actions outlined in the Air Quality Action Plan, with a discussion surrounding the drivers, barriers, and any recommendations from Brent's residents.

Cleaner Transport

Action 1. Accelerate uptake of new low emission vehicles in borough fleet.

Uptake of new low emission vehicles in borough fleet, was a supported action, and highlighted as a priority. However the uptake of low emission vehicles should **not only be limited to council vehicles and buses**. Under this action it was stated that "*the council would speed up the introduction of the cleanest buses on key routes in the borough*". The general view was that a lot of attention has been placed on buses, and rightly so. However there are **many road users responsible for the high level of pollutants** that arise from transportation. According to TfL in terms of **NOx emissions**, road transport is responsible for **63% of emissions**, of which 10% is attributable to TfL busses. ***Actions for vans, diesel cars, motorcycles, heavy good vehicles*** (HGV) need to also be developed.

"A lot of focus on buses. Vans are a bigger contributor now. How much has the introduction of hybrid buses changed pollution levels in Brent? Very little mention of diesel – many other sources that are no mentioned" – Respondent K

Action 2. Tackle unnecessary idling by taxis, coaches and other vehicles.

Tackling idling was a very much supported action. Many respondents suggested the need for an ***anti-idling borough wide campaign***. Respondents felt the council has a responsibility to ***raise awareness*** of what the result of pumping unnecessary toxic fumes out into the air means. Brent council has launched a no-idling' campaign engaging 8 schools across the borough, aimed at reducing the number of idling cars during the school run. No-idling posters and notices need to be also put up around key strategic points in the Borough (eg. rail crossings). The creation of a bylaw was suggested, to tackle the issue of idling. However it was acknowledged that there may be issues with enforcements, as the council may not have the resources to issue penalties. Thus it was then discussed that there may be the **potential to add this into the contract of traffic wardens**. Another suggestion was using the **Community Infrastructure Levy**, and design the **idling campaign as a community led project**.

Action 3. Encourage Car Clubs to use low emission and alternative fuel vehicles in their fleet.

Car clubs received a mix response. Respondents thought it was a good action to encourage car clubs to introduce low emission and alternative fuel vehicles, but wondered why there was no other reference to reducing the number of privately owned cars and miles being driven, such as **encouraging residents to share rides.** A number of our respondents mentioned that **car clubs were neither useful nor practical**, and where targeted at more affluent individuals, and thus considered it an expensive alternative. None of our respondents were part of car clubs, and questioned what the contribution to overall road transport pollution was. A number of respondents were not aware of what car clubs entail, or how they work, and were not aware of any car clubs in their area. Respondents also questioned how much car clubs are used, and if there is any evidence that they work. Our respondents suggested that **the council needs to facilitate for people in Brent to share car ownership**, and/or for **neighbours to share rides**. Respondents suggested LB Brent could team up with organisations such as 'Next Door' that recently acquired 'Street Life' (UK social network), through which it could facilitate a car sharing network.

"Do people only sign up for a period of time and then buy their own car? Is it an action that will support the

long term uptake of people sharing cars?" – Respondent T

"If car clubs were easier and affordable, then maybe more people would use them?" - Respondent Y

Action 4. Support the installation of on street electric vehicle charge points throughout Brent.

Respondents supported the installation of on street electric charge points. However, as there are no clear targets as to when or how this would be put into action feedback was limited. Does the council have specific targets that it could communicate with the residents? By what year and how will the council achieve the installations? The challenge with electric charge points is that there needs to be a **common strategy among all the London Boroughs**, as well as across the whole country. Boroughs need to work together in order to achieve the smooth transition and facilitation for the use of electric vehicles. It has to be ubiquitous; there cannot be one borough with charge points, but not in the other. Moreover developing charge points for electric vehicles will be **complex for local planning and transport authorities** to deliver. More local provision of charge point infrastructure for electric vehicles and low emission car club parking spaces, are essential in order to develop Defra's clean air zones. The logistics in terms of providing the power to charge electric vehicles may prove challenging in the short term, in terms of locating them and working with the Distribution Network Organisation. Making provision within the planning process is fundamental, i.e. **developers could be required to provide charging points for all vehicles within the planning process**. This could assist the relevant local authorities transitioning to a low emission economy. Planers, developers and local authorities need to work together for these measures to take place.

Local authorities will find it challenging to implement charge points for electric vehicles in residential and commercial areas, due to being financially restricted, and lacking skills in developing contracts with providers. They could seek support from The Office for Low Emission Vehicles, established by the central government, or pool contract negotiation skills for developing relationships with providers as local authorities develop partnerships to tackle pollution. It is also **crucial to get residents on board** from the start to support this action. Last but not least, **transport and air quality is intimately linked**, and when discussing a move to electrification of infrastructure, energy use and efficiency also comes in to play.

"What is the point of using electric vehicles if we are burning fossil fuels to power them? We need to think of renewable energy, and creating charge points powered by solar panels for example to charge electric cars" – Respondent B

"No great rush to provide infrastructure for electric vehicles – to provide it, it must be common across the whole country – boroughs need to work together on this. Can't have one borough with charge points, but not in the other." – Respondent H

Action 5. Support the take-up of electric taxis and commercial vehicles.

Similarly with the discussion in Action 4, respondents supported this action, especially as taxis contribute a significant percentage of London's air pollution, and are to be excluded from the mayors Ultra Low Emission Zones.

General comments regarding the section of 'Cleaner Transport'

Road transport is responsible approximately for 63% of NOx emissions and 52% of PM 10. If the council wants to improve air quality in the LB of Brent it needs to go beyond the five actions it outlined in the Air Quality Action Plan. Residents deemed that **the actions to tackle cleaner transport were weak**. Moreover **a lot of road users that travel through Brent are not necessarily Brent residents**. **The council needs to work with neighbouring boroughs as the issue of air pollution goes beyond the borders of Brent.** Under the section 'Cleaner Transport', the actions were targeted mainly at four stakeholders: buses, council vehicles, car clubs, people who idle, and electric car users. There are still many other roads users that contribute to pollution, who seemingly **have not been taken into consideration**.

While there are some measures that can provide benefits in lowering both pollutants and CO_2 emissions, it is important to ensure that measures to improve one do not adversely impact the other. For example, diesel powered cars are more fuel efficient, producing less CO_2 for the same class of vehicle, and were thus encouraged through the Vehicle Excise Duty (VED) and company car tax bandings. Partly due to these tax incentives, new diesel car sales in the UK dramatically increased, from an approximate 14% share in 2000 to 50% in 2012. However they can produce up to 20 times as much PM10 and NOx emissions as a petrol equivalent, and their increased uptake has contributed to poor air quality in London. Respondents stated that when they were buying a diesel vehicle, they thought they were doing the right thing, and are reluctant to give up diesel. Tackling this challenging issue needs to be a crucial part of LB Brent Air Quality Action Plan.

Under the 'Cleaner Transport' actions, there was **no mention of cycling**. Respondents felt that this indicates the council has no intention on encouraging more residents to take up cycling. It should be an action in itself. The biggest **barrier to people cycling in Brent is the quality of infrastructure** and the conditions that people have to cycle in. More people need to take up cycling, but for that to happen, good infrastructure needs to be in place, to make it possible to cycle safely everywhere.

"Brent has particularly large infrastructure barriers. Many road junctions are very hostile to cyclists. The council needs to build safe crossings. Maybe tunnels or bridges that are cyclist friendly?" – Respondent G

"Streets need to be designed for people to walk and cycle, not to encourage people to drive. We need more initiatives that focus on changing our streets" – Respondent B

"Regarding the council's traffic calming approach, using road hump. Decision to put in road humps ahs potentially increased emissions 60-70% as cars accelerate away from them and break when approach. How many accidents a year are there? Let us say there are 37 accidents a year – you put these 20 miles zones – have they reduced accidents? For every accident, how many more people suffering more air pollution? Traffic needs to move slowly and smoothly. Pollution relates to engine speed providing speed is constant. Road humps are not an effective solution." – Respondent J

"The issue of car parking space and cycling is connected. Facilitating people sharing cars and rides can tackle the issue of car parking and having more space for bicycles. There needs to be a facility in Brent for people to share car ownership. For neighbours to share rides." – Respondent T

Public Health and Community Engagement
Action 6. Engage with Local Business to reduce local air pollution.
Respondents thought that engaging with local businesses to reduce local air pollution is important. All companies and the council could be encouraged to declare how staff travel to work as part of a sustainability policy. Incentives could be given to employees to push them to take public transport, cycle, car share, and/or share rides. *"All companies should declare how their staff travel to work – bonus if employees cycle to work – employers need to encourage people. Facilities need to be provided by businesses (showers, change rooms) to enable people to cycle to work"* - Respondent A
Action 7. Promote air quality 'action days'.
The majority of respondents felt that **air quality action days definitely need to be promoted widely**. More awareness needs to be raised regarding the issue of air pollution. **A number of respondents knew very little about air pollution in Brent**, and do not realise how it affects them. They also were not very aware and/or did not take into consideration the effect of their transportation choices. The council could play an important role in **raising awareness through the promotion of air quality 'action days'.** When asked how much responsibility an individual resident carries towards doing their part in tackling air pollution we received a mix response. Certain respondents thought it was not a helpful way to look at it, as people respond to what they are given. Others thought that the local authorities could do more to promote air quality action days. They could produce **visual information that captures the eye**. Especially in **areas that are "hot spots".** And could point people to walk towards roads that are less polluted. Through a major advertising campaign, people can be better informed on the amount of pollution that one breathes in while sitting in their private vehicles. Social marketing can be used to get people to consider who do they think is most at risk. For example **studies have shown that the health benefits of cycling and walking outweigh the harm from inhaling air loaded with toxic fumes**. That is because physical inactivity is such a public health issue, and not that pollution is not detrimental. "*Houses along the north circular road – mum in buggies – children in ground level – it is a violation – no pavements – mothers have got no choice but to use this bit of road"* – Respondent A "*The council could use community centres to raise awareness around the issues of air pollution, and the actions that Brent residents can take."* – Respondent J "*Very little publicised about pollution.*" – Respondent T
Action 8. Ensure schools join the school travel planning programme.
Overall ensuring schools join the school travel planning programme was a supported action. However respondents questioned how it works, and whether it was successful. Moreover they questioned what air pollution busting actions schools are able to implement. Schools are an effective way to communicate to adults and the wider community, the issues of air pollution. **More actions need to be taken around ensuring that school children are not exposed to high levels of pollutants, and this was highlighted as a priority among all respondents**. Especially considering that there are more than **440 schools in the London that are in areas that exceed safe legal pollution levels**. Schools taking part in pollution busting activities and creating personal stories of impact are a way getting people to engage and act on air

pollution. People favoured the idea of using children's point of view of air pollution, as an effective means of getting messages across.

"It is criminal the level of pollutant that some school children are breathing in every day" – Respondent A

Exposure Reduction Measures

Action 9. Identify and develop Low Emission Neighbourhoods where feasible

A number of people did not know much about Low Emission Neighbourhoods. Some of the respondents had heard of them, but that was the extent of their knowledge. They questioned how they work, and what it would entail. The areas our respondents suggested need to be tackled are **Neasden Town Centre, Church end, Wembley and Tokyngton**, as they are highly polluted areas, with heavy traffic. There were fears however of "moving" pollution from one area to another.

Regarding the discussion around air quality action areas, that could inform the development of Low Emission Neighbourhoods, respondents raised **concerns about the North Circular road. Harlesden was also a concern, as well as Chamerlayne and Salusbury road** during the school run hour. The majority of our respondents' thought the selection of action areas in the first draft of the council's air quality action plan made sense.

"If one neighbourhood was to be a Low Emission Neighbourhood would that negatively impact a neighbouring one?" – Respondent A

Action 10. Targeted upgrade of green infrastructure

Overall all our respondents fully support the upgrade of green infrastructure, as it is an action that can be done in the short term to mitigate air pollution. One respondent discussed possible unintended consequences that could arise from inappropriate green infrastructure installations. **Green infrastructure installation needs to be designed carefully taking into consideration any latest published literature on this topic, and examples of best practise**.

Action 11. Promote air pollution forecasting and route planner tools

The promotion of air pollution forecasting tools and route planner tools was considered an important action. People need to be better informed, in order to make better decision. Pollution alerts are set to give three day reliable forecasts. On these particular days, residents need to be encouraged even more to reduce any unnecessary miles driven. **The UK Daily Air Quality Index could be used to highlight the health effects of long-term exposure to air pollution, especially to people with underlying health conditions, and vulnerable groups. Air Quality alerts** are already displayed at thousands locations including bus stops, road signs and underground stations around London. And should also be **displayed at "hot spot" locations in the London Borough of Brent.** Respondents suggested that beside air pollution forecasting, **the council should create an air pollution busting guide on what action the residents of Brent can take**. Also informing people on facts they would not be aware of, such as people sitting in their private vehicles are still exposed to high level of pollutants.

Emissions from New Developments and Buildings
Action 12. Reduce construction emissions
A significant amount of air pollution is created during construction. Our respondents felt that necessary precautions need to be taken in order to reduce these emissions. **The council needs to regularly inspect major construction sites, and fines should be given if regulations are breached**.
Action 13. Limit impact of new development using planning controls
Respondents felt that limiting the impact of new developments using planning controls should be a given. NICE, The National Institute for Health and Care Excellence are expected to publish guidelines regarding outdoor air pollution in June 2017 for local authority staff working in transport, planning, local air quality management and public health. **These guidelines could greatly assist the council in taking the necessary steps to limit the impact on air pollution from new developments**.
Action 14. Enforce combined Heat and Power and biomass air quality policies
Boilers are a significant source of air pollution. Ensuring all new major developments install low emission boilers as a minimum requirement was supported by all our respondents. Many respondents were **concerned about their boilers** and were **unaware of them being a source of air pollution (50%)**. There was a suggestion that information regarding boilers could be tied in with SMART meters. If there are grants available through the national government they could be advertised here.
Action 15. Promote and enforce Smoke Control Zones
Most respondents thought this referred to tobacco smoking.
Action 16. Reduce emissions from the burning of waste or from waste facilities
Respondents were positive regarding the reduction of emissions from the burning of waste or from waste facilities. There were a number of complaints regarding these facilities, as a source of noise pollution.
Action 17. Promote energy efficiency retrofitting projects in workplaces and homes
Although road transport is by far the biggest contributor of NOx there are many other sources, including industry, gas boilers, and many types of machinery from combine harvesters to lawn mowers. Concerning boilers, there are many gas boilers that are too small to require permission to operate under the Integrated Pollution Prevention and Control (IPPC) or Local Authority Pollution Prevention and Control (LAPPC) regimes. These boilers may be broadly categorised as "small" gas boilers. Promoting energy efficiency retrofitting projects in workplaces and homes, and initiatives to use less polluting boilers and assist residential building **owners to replace old boilers could be tied together. The council can also make use of existing manuals that have been developed for reducing pollution from boilers and buildings.** Extensive guides have been developed by Camden council in partnership with the GLA in 2013.
Action 18. Improve energy efficiency in council buildings **Action 19. Update our procurement policies** **Action 20. Investigate options for less polluting deliveries**
Respondents replied positively to these actions, but did not provide any further comments or suggestions.