

**Draft Executive Response to the Air Quality Report and Recommendations of
the Resources and Public Realm Scrutiny Committee**

20 April 2020

1. On 4 December 2019, the Resources and Public Realm Scrutiny Committee made a report and recommendations to the Cabinet on Air Quality, after consideration of substantial oral and written evidence through a series of meetings by a scrutiny task group. The Cabinet's Executive Response and decisions against those recommendations are provided below, under the respective agenda item subjects provided in the minutes of that meeting.

Recommendations and Proposed Air Quality Actions

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

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

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

5. The Council recognises the negative impact of non-residential car use has on air quality in Brent and the need to reduce car travel both to and through the borough.
6. The Council will be developing a Parking Management Strategy in 2020 in preparation for the expansion of ULEZ to the area south of the A406 North Circular Road in October 2021 and the potential impact on congestion and air quality.

7. The Council will work with the Football Association, TfL and strategic partners in developing a strategy for reducing car use and the negative impact on air quality.
8. Local journeys also contribute towards congestion and air quality. The Council have an emissions based permit charging scheme and introduced a diesel levy in April 2019, and will continue to raise awareness of the effects of car travel on air quality and encourage behavioural change towards sustainable travel.

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

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

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

12. Monitoring is ongoing as part of Brent's Air Quality Action Plan obligations. Further funding would be required for more extensive air quality monitoring, however, Brent are planning to proactively pilot low-cost air quality sensors utilising emerging technologies. The Council will also benchmark with neighbouring boroughs on collating air quality data.
13. TfL will monitor and report on the potential effects of the ULEZ expansion, officers will raise concerns with TfL on the measurement of the impact in neighbouring areas or arrange local air monitoring.

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

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

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

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

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

21. The impact of the built environment on air quality in Brent will require assessment and our policies can be aligned to our strategies for growth to reduce any negative impact
22. Brent's Energy and Sustainability team have a number of active initiatives that aim to reduce emissions from housing and in regeneration areas, and will consider further opportunities.
23. A cross council Air Quality Action Group has been established which is attended by the Lead Member for the Environment to focus on meeting air quality improvement targets. This group shall also consider evidence and emerging technologies and initiatives to support lower emissions. Brent are applying to the Greater London Authority for Cleaner Air Borough status in June 2020.

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

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

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

27. The Council has established a robust and on-going programme of air quality auditing and education at schools in the borough. Our 'Breathe Clean' Project,' targeted 56 primary and 10 secondary schools; two air quality assemblies were delivered at each school covering London's current air quality, methodologies for measuring air quality and ways of combatting pollution. In the weeks between assemblies, air quality was measured, with the help of the pupils, across each school. We are now launching

phase two, which targets infant schools. This initiative has helped raise awareness and will encourage behavioural change amongst parents and carers.

28. We continue to engage with schools on their travel plans and raise awareness about the effects of poor air quality to encourage behavioural change.
29. The focus is now on rolling out a 'school streets' programme as it is recognised that school travel plans and engineering work to improve safety for walking and cycling have not addressed congestion around many of our schools.

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

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

Conclusion

34. Clean air is the joint responsibility of local authorities, government, the private sector and individuals, and the Council clearly must take a partnership approach to taking these priority actions forward and making changes to tackle poor air quality in the borough.
35. The recommendations in the Brent Breaths report recognises clean air as one of our two most pressing environmental concerns alongside the Climate Emergency and identifies opportunities for improvement.
36. The Council will help our residents and businesses to understand the issue, its links to inequality and climate change, and how they can change their behaviour to make a positive difference, and ensure that they support interventions that are designed to protect their health and wellbeing.

37. We will develop and support policies and programmes that encourage residents to embrace active travel by walking, cycling and promote the use of public transport instead of car travel.
38. The Council recognises the challenges ahead in delivering the Air Quality Actions identified within this report and the need to deliver real change in the borough working with agencies, partners, businesses and our community.
39. Whilst the recommendations within the Brent Breaths report are welcomed and supported, progress will be dependent on establishing strong collaborative partnerships and funding available.
40. The delivery of air quality actions will be programmed and monitored at future cross council Air Quality Action Group meetings, which are attended by the Lead Member for the Environment.

Cabinet Member: Cllr Krupa Sheth - Cabinet Member for Environment

Lead Department: Regeneration and Environment

Lead Officer: Amar Dave - Strategic Director of Regeneration and Environment