



AIR QUALITY ACTION PLAN



SUMMARY REPORT
2017 - 2022

London Borough of Brent

Air Quality Action Plan 2017 - 2022

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Foreword

A Breath of Fresh Air

The London Borough of Brent's Air Quality Action Plan

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. .

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 but whilst this downward trend is likely to continue for the future the council will need to take action if we are to meet national targets set for NO₂. In addition, there is no threshold below which there are no ill health effects from particulates and local authorities are required to take steps to reduce these emissions where possible. As a result both nitrogen dioxide and particulates remain the focus of the new plan.

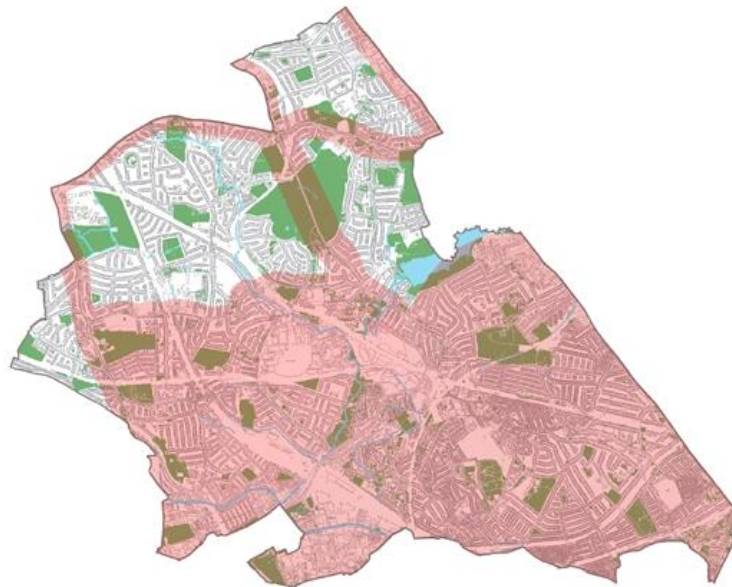


Figure 1: London Borough of Brent's current Air quality Management Area

The largest contributors to poor air quality in Brent are road transport, local energy generation and construction. Action plan measures will focus mainly on reduction of pollution from these sources. Any improvement in air quality will benefit everyone who lives in, works in or visits Brent. 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 some people more vulnerable to the effects of pollution than others. This is best illustrated by 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.

Planning for Air Quality Action

Our Air Quality Action Plan (AQAP) sets out what the council will do to improve air quality in Brent for the next five years and describes how the council will act to reduce pollution from a range of sources. The AQAP also sets out our air quality policy and describes targeted action for partnership work to achieve the greatest air quality benefits. The council also considered a range of external strategies such as the London Plan and the Mayor's Transport and Air Quality Strategies to ensure that there were no proposals that might have a detrimental impact on action plan progress.

As part of the action planning process the council undertook a review of critical policies such as the Brent Borough Plan 2015-2019 and our parking and transport strategies, to ensure consideration was given to strategic aims which would contribute to or benefit from air quality action. This AQAP is complimentary to existing and emerging strategies for walking and cycling. The council will ensure all air quality actions reduce car use and actively promote cycling and walking within the borough as viable alternatives. The AQAP 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. It is a live document so will be subject to annual review which will provide further opportunities to refine and update the plan.

Air Quality Action Plan Measures

The Air Quality action plan consists of 20 actions Brent will implement to deliver air quality improvement. These are split into the following key themes:

1. Cleaner Transport
2. Public Health and Community Engagement
3. Exposure Reduction Measures
4. Emissions from New Developments and Buildings
5. Delivery Servicing and Freight

1. Cleaner Transport:

Road transport is the largest contributor to air pollution in Brent, accounting for over 52% of emissions in the borough. Diesel vehicles are a significant source of particulates which are known to contribute to ill health, and measures to cut diesel use in Brent and reduce their impacts remain our highest priority for action.

We will take steps to limit or reduce the use of vehicles where we can. We will target early action on the most polluting vehicles and take action to limit the environmental impacts of vehicles by increasing access to low emission or alternative fuels, speeding up the introduction of the cleanest vehicles to our fleet, tackling those who idle their engines and introducing an extra charge for diesel vehicles users.

The council will also encourage to the use of public transport or car clubs instead of private 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 the use of less polluting vehicles or a shift to non-car modes of travel such as walking and cycling. The Council will continue to explore options for dis-incentivising car use, and will keep under continual review opportunities for adopting new technologies which aim to reduce vehicle emissions at source.

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 5 air quality action plan measures for cleaner transport are outlined below:

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

The council will speed up the upgrade or replacement of vehicles used for council business with those of the lowest, current emission standard. The council will upgrade or replace vehicles used for council business with low emission, electric vehicles where feasible. The council will also work to speed up the introduction of the cleanest buses on key routes in the borough.

How :

- % increase of new vehicles in council fleet which meets highest standards
- % increase in new / upgraded in council fleet which use alternative fuels
- % increase in number of clean buses in operation in borough

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

The council will undertake idling vehicle campaigns at schools and at key transport hubs such as taxi ranks and bus stands. The council will also improve provision of guidance for reporting issues and strengthen measures for enforcement of anti-idling regulations via the issue of warnings and Fixed Penalty Notices for persistent offenders.

How :

- Evaluation of idling and local environmental impacts via surveys
- Reduction of complaints related to idling
- Number of warnings and Fixed Penalty Notices issued

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

The council will work with car club operators to identify options for increasing the take-up of car club vehicles and provision of the least polluting vehicles for use.

How:

- % Low emission Car Club vehicles in use against baseline established 2016/17

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

The council will identify suitable locations for options for on-street electric vehicle charging and provide support installation where feasible.

How:

- Number of electric vehicle charge points installed

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

The council will investigate the feasibility of installation of Transport for London Rapid Chargers for electric vehicles and identify suitable locations in the borough.

How:

- Publication of feasibility report including list of potential locations
- Target set for installation
- Number of rapid charge points installed

2. Public Health and Community Engagement:

Raising awareness about air quality issues and ensuring that everyone understands their role in tackling poor air quality is a key priority for the council.

We understand the need to provide information and updates regarding local air pollution to residents in a format that is accessible to all. The council will ensure that we better engage with residents, businesses and others via a range of media about local air quality issues. 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.

We will inform and empower others to act to improve their local environment and promote positive steps they can take to encourage others to do the same. We will also provide guidance about healthier, less polluting options for travel and steps everyone can take to reduce their exposure to air pollution. The council will encourage residents to consider alternatives to car use, particularly encouraging the use of active and sustainable travel options such as walking and cycling and promoting the additional positive health benefits of increased physical activity.

The council will 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 3 air quality action plan measures for public health and community engagement are outlined below:

Action 6: Engage with Local Business to reduce local air pollution

The council will ensure businesses with the greatest polluting potential comply with the law and do not exceed limits for emissions to air. The council will also work with other local businesses to identify and implement their own air quality actions which will reduce local air pollution.

How :

- 100% of most polluting businesses are compliant with emission limits
- Publish guidance on reducing local air quality impacts for Brent businesses
- Undertake a feasibility study with selected businesses to identify air quality actions

Action 7: Promote air quality ‘action days

The council will raise awareness about air quality issues by expanding the current programme of low emission days such ‘Play Streets’ and ‘Walk on Wednesdays’ to include community-based action days. The council will also provide guidance and assistance to communities about effective local action to reduce exposure to local pollution.

How:

- Number of days implemented
- Published guidance on local air quality action
- Increased number of residents undertaking air quality action

Action 8: Ensure schools join the school travel planning programme

The council will ensure all Brent schools have travel plans. The council will also support schools with existing travel plans to achieve higher levels of compliance.

How :

- 100% of all schools have travel plan
- 40% of schools with existing travel plan attained higher level of compliance.

3. Exposure Reduction Measures:

Green Space provision 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 provide a range of benefits not limited to improving the general amenity of an area and positively impacting the local environment. The council recognises that additional provision of green space also contributes more generally to the Councils’ commitment for improving health and wellbeing and tackling health inequalities. In the borough

The air quality management area is recognised as generally lacking tree cover and the council seeks to address this by undertaking a targeted upgrade of green infrastructure in suitable locations, increasing planting and the quality of green space where appropriate. We expect

this to also improve the accessibility of key routes to encourage walking and to make the street and public transport viable and attractive travel options.

The 3 air quality action plan measures for exposure reduction measures are outlined below:

Action 9: Identify and develop Low Emission Neighbourhoods where feasible

The council will explore options for local low emission neighbourhoods. Initially this will be focussed on four areas – Neasden Town Centre, Church End, Wembley and Tokyngton and the Kilburn Regeneration Area. These have been identified as areas where traffic emissions are highest and the opportunity exists to design low emission solutions into plans for town centre improvements at the earliest stages. The council will also work with local communities to identify other areas which could become low emission neighbourhoods.

How :

- Undertake a feasibility study to identify options for Low Emission Neighbourhoods

Action 10: Targeted upgrade of green infrastructure

The council will undertake an assessment to identify locations where exposure to poor air quality is high and access to green space or existing planting is limited. The council will undertake audits and develop a programme detailing appropriate action in the areas identified. The council will also assist the community including schools to take action by identifying improvements to local green infrastructure such as the installation of physical or green barriers or increase in tree planting.

How :

- Undertake assessment to identify areas where upgrades to green infrastructure are required
- Publish programme of upgrades and commission works
- Number of scheduled projects completed

Action 11: Promote air pollution forecasting and route planner tools

The council will promote the use of AirText messaging service and apps such as Walkit to allow the community to make informed travel choices on high pollution days.

How :

- Increased number of users for services in Brent
- Publish guidance on options for low-pollution routes for walking/ cycling, alternative travel and other action to be taken on high pollution days

4. Emissions from Developments and Buildings

Building works are a key source of pollution. The borough is subject to regular and ongoing development 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. We will create local low emission zones for construction sites and introduce a

programme of inspections to check compliance as part of a new pan-London initiative. We will control and cut emissions from new and existing development sites and buildings by making sure equipment used in construction meets current standards, promoting or improving energy efficiency and taking enforcement action to control polluting activities

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:

The 7 air quality action plan measures for exposure reduction measures are outlined below:

Action 12: Reduce construction emissions

The council will, in partnership with the Greater London Authority and other borough councils, ensure construction sites meet emission standards for the most polluting types of equipment. The council will inspect construction sites to secure compliance within new low emission zones and control on-site emissions using current enforcement powers.

How :

- % Increase in number of construction sites using least polluting equipment
- % Emissions reduction achieved on major sites within construction low emission zone.
- Reduction in number of complaints made

Action 13: Limit impact of new development using planning controls

The council will review all new planning applications for potential air quality impacts and require all new development have no additional impact on local air pollution as a minimum requirement.

How :

- % Increase in number of developments that are air quality neutral or better

Action 14: Enforce Combined Heat and Power and biomass air quality policies

The council will ensure that all new major developments use low and ultra-low emission boilers. The council will, by creating a register of local plant, be able to map and monitor local increases in this type of equipment, provide guidance regarding future installations and implement further controls where needed. The council will also ensure that all energy generating equipment such as boilers achieve the highest emission standards.

How :

- Create a register of combined heat and power plants and biomass burners within the borough

- Ensure all new major developments install low emission boilers as a minimum requirement
- % Emissions reduction achieved as estimate based on local plant installed

Action 15: Promote and enforce Smoke Control Zones

The council will control the types of fuels that can be used in commercial and domestic buildings by enforcement of the Clean Air Act. The council will also improve guidance to assist businesses and residents to make informed choices about the least polluting fuels and equipment they can use.

How :

- Reduction in number of complaints made about smoke nuisance
- Publish guidance on appropriate use of fuels and equipment for residents

Action 16: Reduce emissions from the burning of waste or from waste facilities

The council will control emissions from waste disposal by using enforcement powers where appropriate. The council will also improve guidance to assist businesses and residents to use the least polluting options for waste disposal.

How :

- Reduction in number of complaints made about smoke nuisance from waste disposal
- Publish guidance on options for waste disposal for residents
- Work with partners responsible for regulating emissions from waste facilities to limit local impacts

Action 17: Promote energy efficiency retrofitting projects in workplaces and homes

The council will proactively promote initiatives to cut energy use, signpost commercial and residential building owners to assist them to replace old boilers and encourage them to adopt other measures to get the most out of energy they use.

How :

- % of residents and businesses adopting energy-saving measures
- % emissions reduction achieved

Action 18: Improve energy efficiency in council buildings

The council will review energy conservation measures and set targets for reducing emissions in our buildings and associated operations.

How :

- % emission reduction for council buildings

5. Delivery Servicing and Freight:

Vehicles delivering goods and services are usually light and heavy duty diesel-fuelled with high primary NO₂ emissions. This type of vehicle is a significant contributor to local air pollution and the council will explore options for reducing diesel use by changing the way local deliveries are made in Brent. Consideration will be given to changing delivery times to reduce contributions to local congestion and incentives for deliveries made using low emission vehicles. .

The 2 air quality action plan measures for delivery servicing and freight are outlined below:

Action 19: Update our procurement policies

The council will ensure we consider the social value of contracts we award rather than on price alone. The council will consider the environmental performance of our suppliers and encourage them to use the most environmentally friendly methods to provide our services. We will set out our environmental standards in updated our policies.

How :

- Updated procurement policies published
- % Successful compliance checks

Action 20: Investigate options for less polluting deliveries

The council will explore options for changing how deliveries in the borough are managed including consideration of alternatives for loading in town centres to reduce congestion, centralising deliveries where feasible, actively managing kerb space to reduce local congestion and idling by use of virtual loading bays. The council will explore the feasibility of options for low emission vehicle use for deliveries and promote this where possible.

How :

- Undertake a feasibility study with selected businesses to identify options for less polluting deliveries

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 fulfilment of our statutory duties.

Air Quality Focus Areas

The action plan includes the designation of four Air Quality Focus Areas (AQFA) or hotspots, as Neasden town centre, Church End, the Kilburn Regeneration Area, and Wembley and Tokyngton. The council undertook local air quality testing and modelling and identified these areas as the worst affected sites within Brent.

In identifying these areas consideration was also given to sites with the greatest traffic emissions and where people would be exposed to air pollution. The council will take steps to ensure that action is taken to address the impacts of regeneration in growth areas at the earliest opportunity. Brent will develop area-based, targeted air quality measures and employ a strategic approach to tackling air pollution in these areas.

Air Quality Focus area 1: Neasden town centre

This area incorporates part of the north circular road as a critical route through the Borough, which is a significant source of pollution. It includes the site of our air quality monitoring station at IKEA and in very close proximity to Dudden Hill Lane. It also includes Neasden goods yard, a significant source of PM₁₀ and Neasden town centre which is earmarked for public realm improvement.

Air Quality Focus area 2: Church End

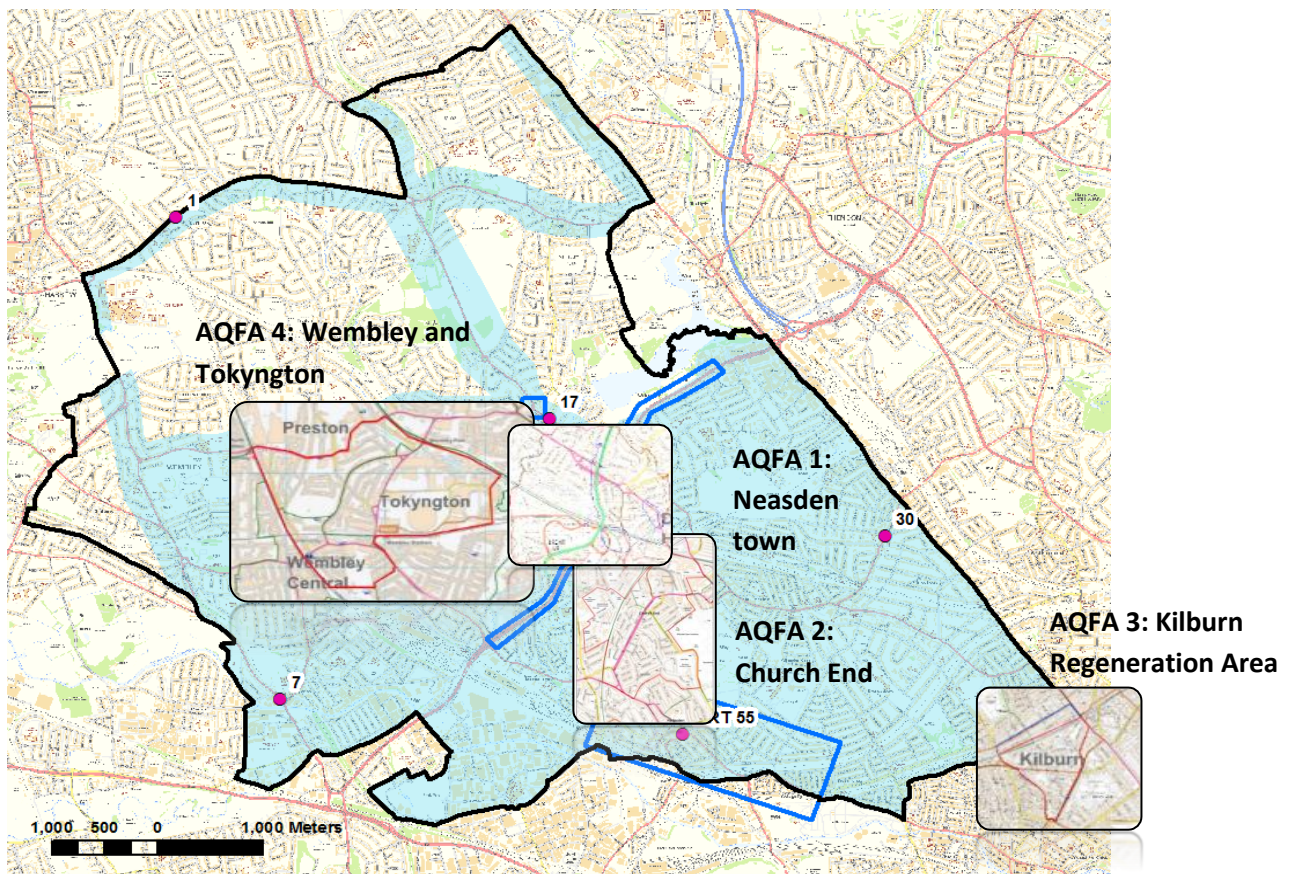
This area is earmarked for regeneration and is planned to include 800 new homes by 2026 supported by additional infrastructure such as education facilities, new health provision and space for recreation and play. It is in close proximity to Harlesden Town Centre, a major power station, industrial areas, residential, green spaces and the grand union canal. The area identified is on the borough boundary so there are potential for cross-borough work and partnership. One of Brent's air quality monitoring stations is within this zone.

Air Quality Focus area 3: Kilburn Regeneration Area

This area is planned to provide 2600 new homes by 2026 and forms part of a major regeneration zone. It is in close proximity to Kilburn High Road, Cambridge Gardens and Brondesbury Road. Transport for London is to escalate the provision of cleaner buses (hybrid) within the zone and along the A5 route. This site includes proposal for a local energy centre. Council is in the process of assisting local residents to undertake their own air quality monitoring in and around this area. At the edge of this area is also development associated with the High Speed 2 site and associated increased heavy goods vehicle movements. There are opportunities for joint work or initiatives with neighbouring boroughs, such as, Camden and Westminster Council.

Air Quality Focus area 4: Wembley and Tokyngton

This area incorporates Wembley High Road; 3 critical public transport hubs – Wembley Park, Wembley Stadium and Wembley Central; 2 key regeneration areas – Wembley Regeneration area around the stadium and Wembley Triangle; and is in close proximity to large developments such as Copland School Development and other residential development along the Wembley High Road.



Area specific projects will be created for each of these 4 localities to address the main sources of pollution.

They will

- provide extra assistance and support to ensure that all schools within the AQFAs have and use school travel plans, are reducing vehicle use associated with schools, are regularly reviewing targets for reducing air pollution and establishing programmes for raising awareness with pupils and parents; ;
- provide assistance and support to businesses within the AQFAs 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 AQFA and draft implementation plans for areas within each;
- Consider 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 AQFAs 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 AQFAs does not mean that air quality action will not be prioritised in the rest of the Borough .The air quality plan includes action for the entire air quality management area as well as hotspots highlighted.

Brent will also work with partner agencies to reduce congestion and emissions from transport on key routes in the AQFAs. This will be completed by reviewing low emission planning guidance for new development sites; reducing emissions from our own borough fleet, and developing policies to increase the local uptake and use of ultra-low emission vehicles.

Way Forward

The council is legally required to comply with the London Local Air Quality Management regime. As part of this duty the Council will submit annual progress reports to the London Mayor's office.

A number of air quality actions plans are already being implemented. For example, works to improve green infrastructure by planting trees in Neasden Lane, auditing of schools in the most polluted areas to identify future air quality improvements that can be implemented, and campaign to tacking idling engines around schools.

The action plan is not an exhaustive list of measures. It is a live document and each review offers an opportunity for the council to respond to any emerging changes to legislation or other priorities. The Council may amend the plan accordingly. Timescales for implementing air quality actions will be confirmed following approval of the air quality action plan measures outlined in this document.

Relevant policies and documents

1. Report 1_LBB_AQAP_Summary Report, 2016, Ricardo Energy & Environment
2. Report 2_LLBAQAP_Modelling, 2016, Ricardo Energy & Environment
3. Report 3_LLBAQAP_AQAP Measures, 2016, Ricardo Energy & Environment
4. UK Air Quality Strategy, 2007, Secretary of State for Environment, Food and Rural Affairs. Accessed at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf
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16. Brent Green Charter, 2011, London Borough of Brent Council. Accessed at: <https://www.brent.gov.uk/media/2025031/Green%20Charter%202011.pdf>
17. Brent Joint Strategic Needs Assessment (JSNA), 2014, London Borough of Brent.
18. Brent Health and Wellbeing Strategy 2014-2017, NHS Brent. Accessed at: <https://www.brent.gov.uk/media/10211032/Health%20and%20Wellbeing%20Strategy%202014-2017%20refreshed.pdf>

Appendix: Air Quality Action Plan Action Details

Action ID	Action	Detail	By	Output
Cleaner Transport				
1	Accelerate uptake of new low emission vehicles in borough fleet	We will target the most polluting vehicles and focus on action to cut diesel use in Brent. We will also take action to limit the environmental impacts of vehicles by increasing access to low emission or alternative fuels, speeding up the introduction of the cleanest vehicles to our fleet by upgrade or replacement. We will also explore options for introducing an extra charge for diesel vehicles users.	2018/22	<ul style="list-style-type: none"> • % increase of new vehicles in council fleet which meets highest standards • % increase in new / upgraded in council fleet which use alternative fuels • % increase in number of clean buses in operation in borough
2	Tackle unnecessary idling by taxis, coaches and other vehicles	<p>We will actively discourage those who idle their engines via the implementation of idling vehicle campaigns at taxi ranks, bus stands and schools and other key locations identified</p> <p>as well as via a general campaign to raise awareness about the issue</p> <p>Enforcement of anti-idling regulations via issue of warnings and fixed penalty notices for persistent offenders.</p> <p>Revisit idling campaigns at key transport hubs and focus areas</p>	2018/20	<ul style="list-style-type: none"> • Evaluation of idling and local environmental impacts via surveys • Reduction of complaints related to idling • Number of warnings and Fixed Penalty Notices issued
3	Encourage Car Clubs to use low emission and alternative fuel vehicles in their fleet	The council will work with car club operators to identify options for increasing the take-up of car club vehicles and provision of the least polluting vehicles for use.	2018/22	<ul style="list-style-type: none"> • % Low emission Car Club vehicles in use against baseline established 2016/17

Action ID	Action	Detail	By	Output
4	Support the installation of on-street electric vehicle charge points throughout Brent	The council will identify suitable locations for options for on-street electric vehicle charging and provide support for installation where feasible.	2018/22	<ul style="list-style-type: none"> Number of electric vehicle charge points installed
5	Support the take-up of electric taxis and commercial vehicles.	The council will investigate the feasibility of installation of Transport for London Rapid Chargers for electric vehicles and identify suitable locations in the borough. The council will undertake an annual review of chargers installed from 2020 onwards.	2018/22	<ul style="list-style-type: none"> Publication of feasibility report including list of potential locations for future EVCPs and target set for installation Number of rapid chargers installed reviewed annually

Public Health and Community Engagement

6	Engage with Local Business to reduce local air pollution	<p>The council will ensure businesses with the greatest polluting potential comply with the law and do not exceed limits for emissions to air. We will ensure all installations regulated under the Environmental Permitting Regulations comply with pollution emission controls</p> <p>The council will also work with other local businesses to identify and implement their own air quality actions which will reduce local air pollution. This will include investigating the potential for air quality action for large and medium-sized employers in strategic employment areas.</p>	Annual review 2018/19	<ul style="list-style-type: none"> 100% of most polluting businesses are compliant with emission limits Publish guidance on reducing local air quality impacts for Brent businesses Undertake a feasibility study with selected businesses to identify air quality actions
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Action ID	Action	Detail	By	Output
7	Promote air quality action days	<p>The council will promote air quality action days to encourage behaviour change and reduce pollution in priority areas.</p> <p>Council currently promotes low emission days via initiatives such as Walk on Wednesdays for schools and Play Streets. The council will seek to expand or enhance this programme, especially in Focus Areas where possible.</p>	2018/22	<ul style="list-style-type: none"> • Number of days implemented • Published guidance on local air quality action • Increased number of residents undertaking air quality action
8	Ensure schools join the school travel planning programme	<p>The council will ensure all Brent schools have travel plans. The council will also support schools with existing travel plans to achieve higher levels of compliance, attain STARS accreditation or maintain existing gold accreditation in the same scheme.</p>	2018/22	<ul style="list-style-type: none"> • 100% of all schools have travel plan • 40% of schools with existing travel plan attained higher level of compliance.

Exposure Reduction Measures

9	Identify and develop Low Emission Neighbourhoods where feasible	<p>The council will explore options for local low emission neighbourhoods. Initially this will be focussed on four areas – Neasden Town Centre, Church End, Wembley and Tokyngton and the Kilburn Regeneration Area. These have been identified as areas where traffic emissions are highest and the opportunity exists to design low emission solutions into plans for town centre improvements at the earliest stages. The council will also work with local communities to identify other areas which could become low emission neighbourhoods.</p> <p>The council will identify opportunities for incorporation into wider public realm projects at the planning stage</p>	2018/22	<ul style="list-style-type: none"> • Undertake a feasibility study to identify options for Low Emission Neighbourhoods
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Action ID	Action	Detail	By	Output
		likely to be as subject to additional consultation and may be associated with a significant lead time for delivery.		
10	Targeted upgrade of green infrastructure	The council will identify opportunities for the enhancement of green infrastructure at appropriate locations, especially in areas where exposure to poor air quality is high. The council will consider installation physical or green barriers and/ or increased planting in these areas.	2018/22	<ul style="list-style-type: none"> • Undertake assessment to identify areas where upgrades to green infrastructure are required • Publish programme of upgrades and commission works • Number of scheduled projects completed
11	Promote air pollution forecasting and route planner tools	The council will continue promote the use of AirText messaging service and similar route planning applications such as Walkit to allow the community to make informed travel choices on high pollution days. The council will also consider the promotion of other tools which will highlight the additional health benefits of active travel and	2018/22	<ul style="list-style-type: none"> • Increased number of users for services in Brent • Publish guidance on options for low-pollution routes for walking/ cycling, alternative travel and other action to be taken on high pollution days
Emissions from Developments and Buildings				
12	Reduce construction emissions	The council will, as a member of the London Low Emission Construction Partnership, and with the Greater London Authority and other borough councils, ensure construction sites meet emission standards for the most polluting types of equipment – particularly Non Road Mobile Machinery. The council will inspect construction sites to secure	Annual Review from 2018/19	<ul style="list-style-type: none"> • % Increase in number of construction sites using least polluting equipment • % Emissions reduction achieved on major sites within

Action ID	Action	Detail	By	Output
		<p>compliance within new local low emission zones and control on-site emissions using current enforcement powers.</p> <p>The council will also require developers to comply with legislation and planning conditions to control on site emissions.</p>		<p>construction low emission zone.</p> <ul style="list-style-type: none"> Reduction in number of complaints made
13	Limit impact of new development using planning controls	<p>The council will review all new planning applications for potential air quality impacts and require all new development have no additional impact on local air pollution as a minimum requirement. The council will undertake proactive assessment of the air quality impacts of new development, review construction method statements, enforce planning and environmental legislation and require all new development to be air quality neutral or better.</p>	Annual Review from 2018/19	<ul style="list-style-type: none"> % Increase in number of developments that are air quality neutral or better
14	Enforce Combined Heat and Power and biomass air quality policies	<p>The council will ensure that all new major developments use low and ultra-low emission boilers. The council will, by creating a register of local plant, be able to map and monitor local increases in this type of equipment, provide guidance regarding future installations and implement further controls where needed. The council will also ensure that all energy generating equipment such as boilers achieve the highest emission standards</p>	Annual Review from 2018/19	<ul style="list-style-type: none"> Create a register of combined heat and power plants and biomass burners within the borough Ensure all new major developments install low emission boilers as a minimum requirement % Emissions reduction achieved as estimate based on local plant installed

Action ID	Action	Detail	By	Output
15	Promote and enforce Smoke Control Zones	Brent is entirely a smoke control zone and the council will control the types of fuels that should be used in commercial and domestic buildings by enforcement of the Clean Air Act.. The council will also improve guidance to assist businesses and residents to make informed choices about the least polluting fuels and equipment they can use.	Annual Review from 2018/19	<ul style="list-style-type: none"> • Reduction in number of complaints made about smoke nuisance • Publish guidance on appropriate use of fuels and equipment for residents
16	Reduce emissions from the burning of waste or from waste facilities	The council will control emissions from waste disposal by using enforcement powers where appropriate. The council will also improve guidance to assist businesses and residents to use the least polluting options for waste disposal.	Annual Review from 2018/19	<ul style="list-style-type: none"> • Reduction in number of complaints made about smoke nuisance from waste disposal • Publish guidance on options for waste disposal for residents • Work with partners responsible for regulating emissions from waste facilities to limit local impacts
17	Promote energy efficiency retrofitting projects in workplaces and homes	The council will proactively promote initiatives to cut energy use, signpost commercial and residential building owners to assist them to replace old boilers and encourage them to adopt other measures to get the most out of energy they use.	Annual Review from 2018/19	<ul style="list-style-type: none"> • % of residents and businesses adopting energy-saving measures • % emissions reduction achieved
18	Improve energy efficiency in council buildings	<p>The council will review energy conservation measures and set targets for reducing emissions in our buildings and associated operations.</p> <p>The council will signpost commercial and residential building owners to</p>	Annual Review from 2018/20	<ul style="list-style-type: none"> • % of residents and businesses adopting energy-saving measures • % emissions reduction achieved

Action ID	Action	Detail	By	Output
		<p>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 where possible.</p>		
<h2 style="color: #0070C0; margin: 0;">Delivery Servicing and Freight</h2>				
19	<p>Update our procurement policies</p>	<p>The council will ensure we consider the social value of contracts we award rather than on price alone. The council will consider the environmental performance of our suppliers and encourage them to use the most environmentally friendly methods to provide our services. We will set out our environmental standards in updated our policies.</p>	2018/22	<ul style="list-style-type: none"> • Updated procurement policies published • % Successful compliance checks
20	<p>Investigate options for less polluting deliveries</p>	<p>The council will explore options for changing how deliveries in the borough are managed including consideration of alternatives for loading in town centres to reduce congestion, centralising deliveries where feasible, actively managing kerb space to reduce local congestion and idling by use of virtual loading bays. The council will explore the feasibility of options for low emission vehicle use for deliveries and promote this where possible</p>	2018/22	<ul style="list-style-type: none"> • Undertake a feasibility study with selected businesses to identify options for less polluting deliveries