

Report on LB Brent Consultation on the Draft Air Quality Action Plan

Prepared for Brent Council

June 2023

DRAFT REPORT

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Background

Brent Council commissioned Kaizen to support with community engagement around the draft new Air Quality Action Plan (AQAP), with the aim of raising awareness of the AQAP consultation, pointing people to the summary video and online survey, and sharing the key messages on the AQAP.

Kaizen, founded in 2000, is an award-winning social business that specialises in designing, delivering and facilitating cutting edge projects. Kaizen delivers work across the community sector including the areas of regeneration, education, employment, housing and the social care field. Kaizen has wide-ranging community engagement, research and consultation expertise.

The engagement described in this report comprises **Phase 2b** of the three phases to the communications and engagement plan around the 2023-2027 AQAP:

Phase 1: Before drafting the AQAP

- The aim for phase 1 engagement was to gather views on themes and priorities for the AQAP from a representative cross-sectional sample of residents so the council can have confidence that the findings are robust. In particular it was important to include less heard and quieter voices alongside the views of residents who are passionate about the issue of air quality.
- 488 people who were broadly representative of the demography of the borough shared their views. This phase was completed in October 2021 (engagement was delivered by Kaizen). The report on engagement is available through this link: https://haveyoursay.brent.gov.uk/en-GB/projects/air-quality-action-plan/

Phase 2: After drafting the AQAP

- Phase 2a: The draft plan was shared with GLA and Council Members for review
- Phase 2b: Statutory Consultation and Community Feedback as outlined in this report

Phase 3: After consultation

 Phase 3 will take place after the final AQAP is published. The final document will be shared with relevant groups and promoted through corporate channels.



Approach

The consultation on the draft plan was delivered by Brent Council over a six-week period from late March to early May 2023.

There were a range of methods used to both share the draft plan and encourage and support residents to share their views

- The draft AQAP was **hosted on the Brent Council** "Have your say" website and **emailed to stakeholders**. A range of materials were prepared to make the draft plan more accessible for residents.
- An online survey¹ was hosted by Brent Council and was open for six weeks (20th March to 2nd May). The link to this survey was published on Brent Council's website and social media, promoted through a press release, and distributed through Brent's resident and community networks.
- **Pop-up events** took place at a range of locations across the borough in order to inform the local community about the draft plan and signpost to the online survey. Roll-up banners were displayed to increase visibility of the pop-up stall, and the engagement team had hard copies of an 'easy read' version of the Action Plan as well as leaflets and other materials (see Appendix 5).
 - Tablets were used as an interactive tool to show a promotional video about the process, to view the the draft plan, to preview the online questionnaire, and on some occasions to enable a person to complete the online questionnaire on the spot. Paper questionnaires were also available. The pop-up locations included libraries and community hubs and thirteen Air Quality Focus Areas (AQFAs)². The programme of the these events was publicised through Brent Council. Kaizen engagement team provided support for the pop-ups.
- Presentations at Forums and Brent Connects Sessions there were 2 presentations at community forums, with one virtual and one in person event, and 3 at Brent Connects sessions.
- Two **online sessions** were held for residents to hear about the draft Action Plan, to ask questions and to share their views.
- Residents could also share feedback on the draft plan via email, phone, and post.

¹ The questionnaire was developed by Brent Council and Kaizen.

² AQFAs are as defined by the Greater London Authority's 2016 London Atmospheric Emissions Inventory.



About the data

Qualitative and quantitative data were analysed. Quantitative data and findings in this report (unless otherwise stated) are drawn from survey responses only, while qualitative findings are drawn from survey responses as well as discussions which took place in the forums. For charts, and in text, figures have been rounded to the nearest whole number so on occasion the total will be other than 100%. Statistics relate to the total percentage of people who answered a particular question, rather than to the total number engaged, as not all questions were answered by everyone.

For the open questions we performed thematic analysis, hand coding for themes that emerged using the principles and approach of Grounded Theory. The term 'Grounded Theory' refers to theory that is developed inductively from a body of data, rather than from the preconceptions of the researchers.

It's important to note that, while the opportunity to share views on the draft Air Quality Action Plan was shared with a diverse range of Brent communities, the statistics and findings outlined in this report should not be interpreted as being reflective of the views of all Brent residents. This is for two reasons: (1) a small number of people (fewer than one hundred) shared their views, and (2) the demographics of the people who did share views are not representative of the Borough. Appendix 2 contains further information on the profile of people who shared their views in comparison with the profile of Brent residents using 2021 census data.



Headline Stats

Views on the draft Air Quality Action Plan

- 62% of people responded positively (saying "Love it" or "Like it") to the Council's vision statement around air quality
- 71% believe that Core Aim 1 "Reduce Pollutions Concentrations" should be the main priority
- 57% thought that "Discourage unnecessary engine idling" would be the most impactful proposed action, followed by "Provide infrastructure to support walking and cycling" (56%)
- Overall, only 10% of people who gave their views expressed a negative opinion of the draft plan. 40% of people expressed a positive view, 41% said "it's OK", and 8% weren't sure.

Stakeholder groups

- Three stakeholder groups gave a response:
 - Environment Agency
 - Canal & River Trust
 - Mums for Lungs
- Two of the groups (Canal & River Trust and Mums for Lungs) offered feedback on specific points which they believed would improve the plan or Brent Council's approach to air quality. The Environment Agency did not provide specific feedback but responded with generic points which should be included in any AQAP.

Who shared views

- 92 people gave their views either online or on a paper questionnaire
 - 2 local Councillors shared their views (separately to the Councillor consultation in Phase 2a) (one online and one at a pop-up event)
- 23 people who attended forums shared their views via Mentimeter during the
 event
- 2 people shared their views via email or phone
- Of those who completed a survey:
 - 96% live in Brent. 20% work in the Borough and 3% run a business in Brent
 - 56% of people said that their views had never been consulted before (27%) or not much (29%)
- Additionally, over 400 people interacted with the engagement team during pop-up events and were informed about the draft AQAP and how they could see the plan and share their views



What was done

Materials

Brent Council produced a number of materials to make the draft AQAP itself, as well as the process of sharing feedback, as accessible as possible. These included:

- An "easy read" version of the draft Action Plan, which was available for perusal in hard copy at engagement events and also for download through the website
- A **video** which succinctly explained the issue of air pollution, shared the council's vision, core aims, and actions that will be taken; and provided the URL where people could share their views. Link to video: <u>Air Quality consultation have your say YouTube</u>
- A **dedicated website** which contained all of the relevant information about the Action Plan and the ongoing engagement period (this was located at https://haveyoursay.brent.gov.uk/en-GB/projects/air-quality-action-plan)
 - o Documents which could be downloaded from this website included:
 - Brent's 2017-2022 Air Quality Action Plan
 - Brent's 2023-2027 draft Air Quality Action Plan (full length)
 - Brent's 2023-2027 draft Air Quality Action Plan (easy read version)
 - Report on engagement research, February 2022 (full length)
 - Report on engagement research, February 2022 (summary)
 - Air Quality Management Area order 2023
 - Programme of AQAP engagement events
 - AQAP consultation leaflet
 - The website additionally provided context for the Action Plan, outlined the phases on development of the Air Quality Action Plan, and provided up-to-date information on engagement events.
- Two roll-up banners which were used at pop-up events
- A leaflet which had a QR code to the "Have your say" webpage and was available at the pop-up events as well as being disseminated by email to Brent's community networks.

Schedule of pop-up events

Date	Times	Locations - Pop-up events
30 th March	10am - 1pm	Wembley (AQFA) Brent Civic Centre, Engineers Way, Wembley Park, Wembley HA9 0FJ
30 th March	2:30pm – 5:30pm	Wembley Library / Brent Connects Brent Civic Centre, Engineers Way, Wembley Park, Wembley HA9 0FJ
31 st March	10:30am – 1pm	Kilburn Library (adjacent to AQFA) 42 Salusbury Rd, Kilburn, NW6 6NN



31 st March	2:30pm – 5:30pm	Queens Park (AQFA) 38 Salusbury Rd, London NW6 6LT Moved to Kilburn Library mid-afternoon due to rain
3 rd April	10am - 1pm	Cricklewood (AQFA) 142-152 Cricklewood Broadway, London NW2 3ED
3 rd April	2:30pm – 5:30pm	Willesden Green (AQFA) Walm Ln, London NW2 4QT
4 th April	10:30am – 1pm	Kingsbury Library (AQFA) Kingsbury Library, Kingsbury Rd, London NW9 9HE
4 th April	2:30pm – 5:30pm	Kingsbury High Street (AQFA) 632-640 Kingsbury Rd, Kingsbury Circle, London NW9 9HN
6 th April	10am – 12:30pm	Colindale (AQFA) 287 Edgeware Rd, London W2 1GN
6 th April	2:30pm – 5:30pm	Burnt Oak (AQFA) 43 Burnt Oak Broadway, Burnt Oak, Edgware HA8 5JZ
12 th April	10am - 1pm	Church End (AQFA) Willesden Market, Church Rd, NW10 9QH
12 th April	2:30pm – 5:30pm	Neasden (AQFA) 304 Neasden Ln, Neasden, London NW10 0AD
13 th April	10:30am – 1pm	Willesden Green Library (AQFA) 95 High Rd, London NW10 2SF
13 th April	2:30pm – 5:30pm	Brent Hub Kilburn: Hornbill house (AQFA) Hornbill house, 2 Rudolph Rd, London, NW6 5GG
17 th April	10am – 1pm	Kenton (AQFA) Kenton Rd, Harrow HA3 8AZ
17 th April	2:30pm – 5:30pm	Sudsbury (AQFA) 818 Harrow Rd, Wembley HA0 3DQ
20 th April	10am – 1pm	Ealing Road (AQFA) 204 Ealing Rd, Wembley HA0 4QG
20 th April	2:30pm – 5:30pm	Brent Hubs: Kingsbury Kingsbury Library, Kingsbury Rd, London NW9 9HE
21 st April	10am – 1pm	Kensal Rise (AQFA) outside Kensal Rise station, Chamberlayne road Moved to Kilburn Library mid-morning due to rain
21 th April	2:30pm – 5:30pm	Harlesden High Street (AQFA) Moved to Kilburn Library due to rain
2 nd May	11am – 2pm	Kensal Rise (AQFA) outside Gail's Bakery, Chamberlayne road (opposite no. 91)





Community Forums

Date	Event	Venue	Description
2 nd March	Brent Connects	Online	Brent Council gave a brief presentation
	(Harlesden)		on the draft AQAP and air quality in
			Harlesden. About 10 minutes of the forum
			was dedicated to the AQAP.
13 th March	Brent Connects	Online	Brent Council gave a brief presentation
	(Kingsbury and		on the draft AQAP and air quality in the
	Kenton)		area. About 10 minutes of the forum was
			dedicated to the AQAP.
29 th March	Care Homes Forum	Online	Brent Council + Kaizen gave a brief
			presentation on the draft AQAP. About 10
			minutes of the forum was dedicated to the
			AQAP.
30 th March	Brent Connects	Online	Brent Council gave a brief presentation
	(Wembley)		on the draft AQAP. About 10 minutes of
			the forum was dedicated to the AQAP.
5 th April	Pensioner's Forum	In person	Brent Council + Kaizen gave a
		at Brent	presentation on the draft AQAP.
		Civic	Mentimeter was used to gather views in
		Centre	real time. About 1 hour of the forum was
		-	dedicated to the AQAP.
19 th April	Residents' Forum	Online	Dedicated 1-hour online session where
			residents could hear a presentation about
			the AQAP, ask questions, and share
			views. Led by Brent Council + Kaizen.
			Mentimeter was used to gather views in
41-			real time.
20 th April	Residents' Forum	Online	Dedicated 1-hour online session where
			residents could hear a presentation about
			the AQAP, ask questions, and share
			views. Led by Brent Council + Kaizen.
			Mentimeter was used to gather views in
			real time.

Stakeholder Engagement

Communications were sent to the following stakeholders:

Internal Stakeholders

- Brent Council staff (leaflet drops in Civic Centre and website)
- Members (6th and 11th April 2023)
- Brent Health and Wellbeing Board (17th April)

External Stakeholders, including Statutory Stakeholders

- Greater London Authority (GLA) (21st March)
- the Secretary of State via Defra (21st March)
- the Environment Agency (21st March)



- Transport for London (22nd March)
- NHS North West London Integrated Care Board (21st March)
- All neighbouring boroughs Lead Members and Air Quality Officers (Harrow, Barnet, Camden, Westminster, Ealing, Hammersmith and Fulham, Kensington and Chelsea (21st March)
- Brent residents and community groups (30th March)
 - Additional emails sent to 60 BAME organisatins on and Young Brent Foundation membership with several hundred youth organisations and individuals across Brent (12th April).
- Medical Practices through NHS ICB 3rd April
- Early Years Settings bulletin (20th April)
- Businesses (12th April)

Brent Council corporate communication channels

External:

- Your Brent e-news (23k subscribers) (24th March, 6th April)
- Brent website
- Social media: Facebook (13k followers), Twitter(24.3k followers) and Instagram (3.5k followers)
- Posters/leaflets in community hubs
- Brent business news e-newsletter (12th April)
- Headteachers via Best Brent
- Provider forums (Pensioners' forum, Care Homes forum)
- Library Noticeboards leaflets, digital display
- Residential noticeboards (community hubs, libraries, community centres) leaflets
- Faith centres leaflets
- Environmental charities
- Brent Connects newsletters

Internal:

- Members' Briefing
- Members' bulletin
- Brent Health and Wellbeing Board
- Town centre managers
- Neighbourhood managers
- Brent news story
- Flyers

Other engagement activities

- Publishing on Brent Council social media channels
 - Facebook post with video 24 March (>1,000 views)
 https://www.facebook.com/watch/?v=605217921165858
 - Engagement pop-up and online events advertised on Facebook, reaching 636
 - Twitter post with video 24 March (>3,500 views)



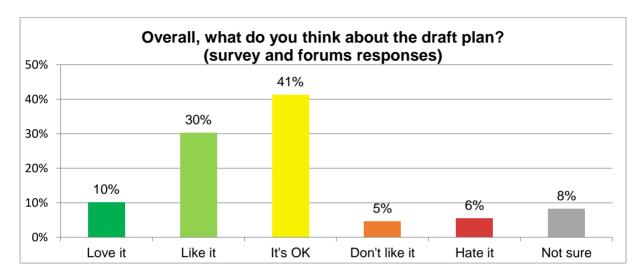
- Online resident forums posted on Twitter 18 April (>800 views) https://twitter.com/Brent Council/status/1648359002097565702
- Sharing the consultation information via email, including link, video, a copy of the leaflet, date of engagement events and online resident forums to the Council's Strategy and Parternerships contact list on 30 March; comprised of:
 - Chief Executives of Forums and Groups (26 contacts)
 - Brent's BCAP (Black Community Action Plan) mailing list (701 contact)
 - Neighbourhood Groups (61 contacts)
 - Internal Brent Contacts (28 contacts)
 - Brent Social Workers mailing list (11 contacts)
 - Pensioners mailing list (22 contacts)
 - Youth Organisations (50 contacts)
 - Multi-faith groups (74 contacts)
 - Disabilty groups (28 contacts)
 - Borough of Sanctuary mailing list (6 contacts)
 - Climate and Environment mailing list (31 contacts)
 - Irish Community group (1 contact)
 - Eastern European mailing list (17 contacts)
 - o Emerging Communities (20 contacts)
 - Asian community mailing list (15 contacts)
 - Somalian community mailing list (8 contacts)
 - Black Community mailing list (12 contacts)
 - Brazilian Community Mailing list (3 contacts)
 - Arab Commnity mailing list (11 contacts)
 - Food bank mailing list (18 contacts)
 - Credit Unions (2 contacts)
 - Businesses mailing list (3 contacts)



Public feedback on the draft Air Quality Action Plan

Overall views about the draft plan

Overall, 40% of people who gave their views were positive about the draft plan (saying they loved it or liked it), while 41% believed it was OK.



Base = 109 (87 from surveys and 22 from forums)

There were 18 additional comments, for example:

"It's very well produced, explained very well, not sure about some of the words."

"Anything that's going to improve air quality in Brent is a good thing."

"Bit complicated in parts."

"It's a starting point. Hope you execute it."

Two people who shared their views via email had specific criticisms:

"The plan is not adequate. It's got too many escape clauses [...]

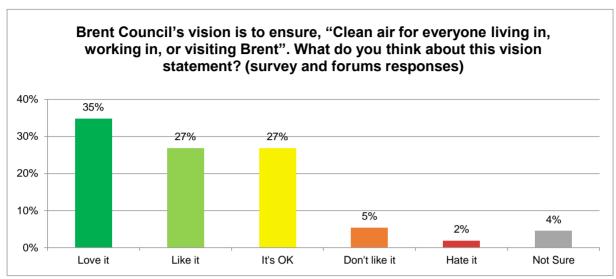
It feels like the leadership of the council is not at all serious about doing anything that matters for pollution reduction. Just going through the motions."

"It's been 200 years since the industrial revolution. Things need to be done differently, we need to make sure there is co-ordination amongst boroughs."

Feedback on the AQAP vision statement



People were asked how they felt about the Council's vision statement for the AQAP. 62% responded positively (loved it or liked it), while 27% thought it was OK and 7% had negative views.



Base = 112 (89 from surveys and 23 from Mentimeter)

20 people made additional comments, mainly to clarify or reinforce their response, sometimes with a caveat.

"It's a start. Clean air for everyone, full stop. Not just Brent."

"Yes, why not, sounds great!"

"Just words that sound like a election pledge."

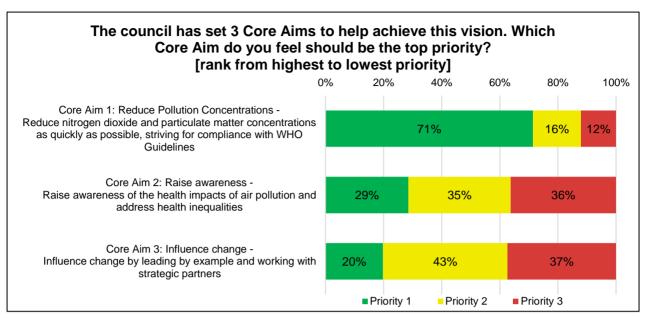
"If it can deliver, I don't think Brent will achieve clean air, but it might get cleaner air."

"Yes, very much, I can get behind it!

Prioritisation of the Core Aims

People were asked which of the three core aims of the draft plan should be prioritised. A sizeable majority (71%) believed Core Aim 1 - "Reduce Pollution Concentrations" should be the top priority for the plan.





Base = 91

53 additional comments and reflections were made on the core aims:

- A quarter of comments were related to traffic reduction, improved transport and infrastructure
- A similar number of comments mentioned all three Core Aims should be equal priorities
- About one in ten people reinforced their choice and mentioned education/awareness as a priority
- A similar number mentioned the plan needed to be clearer
- A few comments were related to the promotion of cycling
- Other comments included:
 - More penalties/restrictions
 - More trees
 - More action

"More than extending ULEZ and charging more we should help owners of old cars to switch to electric and prioritise sharing/ cycling and public transport."

"Better infrastructure, for example for cyclists to reduce cars especially HGVs in residential areas."

"There is little point in ranking them. We need action, immediate action on all three."

"Tackle transport-related emissions."

"Education of individuals responsible, advising of law and potential fines."

"Penalties to influence non compliance."

"Plant trees !!!"



"Core aim 1 is specific, which is great. I think core aim 2 and 3 could do with a more precise goal, ie. what does it mean to 'lead by example'?"

Views on impact of proposed actions to reduce air pollution

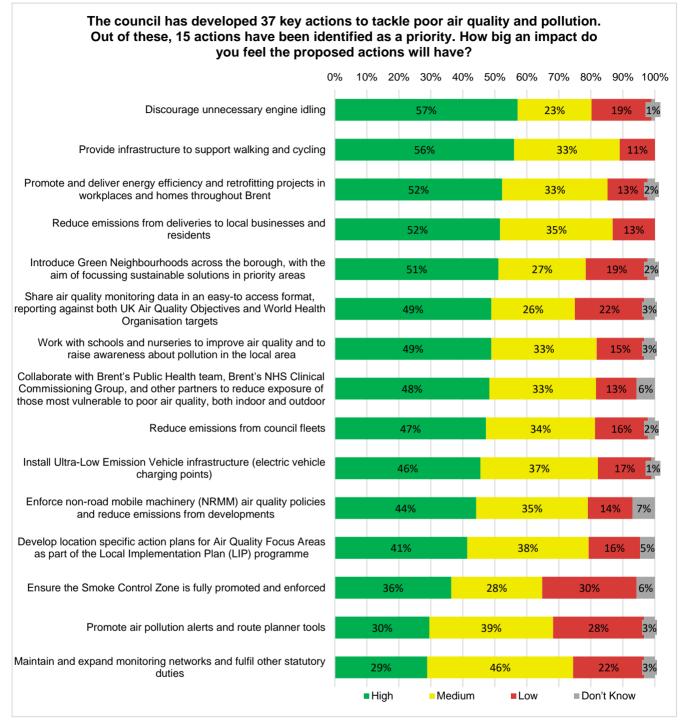
People were also asked how big an impact they thought fifteen of the key proposed actions would have by ranking each action as having high, medium, or low impact.

Over half of people who gave their views on this thought that the following actions would have the greatest impact (percentages shown are the percent of people who ranked the action as "high"):

- Discourage unnecessary engine idling (57%)
- Provide infrastructure to support walking and cycling (56%)
- Promote and deliver energy efficiency and retrofitting projects in workplaces and homes throughout Brent (52%)
- Reduce emissions from deliveries to local business and residents (52%)
- Introduce Green Neighbourhoods across the borough, with the aim of focussing sustainable solutions in priority areas (51%).

The chart below shows the perceived impact of the proposed actions.





Base = 91



Ideas for improving air quality

People were asked what ideas they had for other things that could be done to improve local air quality. This was framed as an open question, and 68 people gave a response.

- Over a third of people who shared their views said that traffic reduction and better or more public transport would improve the air quality in Brent
- About a quarter said that encouraging cycling and walking would improve the air quality in the Borough
- A similar number of people believed that deterring measures and penalties or fines would improve the air quality
- A small number of people suggested more green spaces and more trees to be planted
- Other comments included:
 - o promotion of electric cars
 - o more information/awareness
 - o zip cars and car clubs
 - better house insulation

"Urban forests, incentives to small businesses, higher fines for violations, less cars in the area."

"Dynamically close roads by schools when the air pollution exceeds limits."

"Check the extractor/A/C and fan of the premises. Forbidden smoke outside the restaurant."

"Spot checks on vehicles, used to happen. Cars that fail are taken off to the pound."

"Emphasise better pavements so it is safe to walk on. Better sidewalks and roads.

Pavements are not safe!"

"More trees and greenery. Better timed traffic lights around the National Stadium. Review traffic "calming measures" on event days because they currently make it WORSE! Better planning with roadworks to reduce jams..."

"Actual enforcement of engine idling laws."

"Hybrid buses. Look at other countries for ideas, don't be too proud. Sweden comes to mind. Template."

"Engage with local schools to come up with an advert campaign, to promote climate change. Poster: There is no planet B, sort this one first."

"Reducing parking in town centres, encouraging making shorter journeys by foot, by bike, or on public transport."



Things people didn't like about the draft AQAP

People were asked if there were any aspects of the plan they didn't like, or areas they thought the council could do more. 59 people shared a view.

- Over a third of people who shared their views believed the draft plan could be clearer or desired more specific action from the Council
- One in five people suggested more could be done in terms of traffic reduction, improvement of public transport and parking
- A similar number of people also believed walking and cycling could be encouraged more
- A small number of people thought more green spaces and trees were needed
- Other suggestions included:
 - o more deterring measures and enforcement
 - incentives to reduce emissions
 - more education and raising awareness about air quality

"I think the plan needs to be more specific - explain exactly what the green areas are for example and set more specific targets rather than using general language like 'improve'."

"In general, it lacks quantitative targets, and the time to action is very slow. Installing cycle lanes and LTNs can be very quick if you have the political will."

"Less instruction, people are aware, they won't change without repercussions."

"Residents can't wait another year; we need action now."

"Lead by example. ie the Council Leader should not cruise around the borough in a large Mercedes at election times. Get on a bike Councillor Butt."

"Needs to be more focussed on active travel."

"I know it's just a draft so I'll reserve full judgement, but I wish it touched on logistics more."

"Weak weak weak actions. Not bold enough. Too many actions. Really weak on actually taking measures to reduce cars and build infrastructure for active travel.

Eg bikes/cars etc."

"More trees planted."

"Promote car clubs and reduce car ownership. Parked cars cause traffic jams which result in idling engines of stationery traffic."



"No, its okay as it is. Its both accessible & achievable, it's a marathon not a sprint."

Questions and concerns about the draft plan

Members of the community were also asked whether they had any questions or concerns about the draft plan. 47 people shared their views on this.

- Over a quarter of people expressed concerns about the clarity of the draft plan and the lack (or slow) action from the Council
- One in five people said they had no concerns about the draft plan
- A small number of people were concerned about the traffic reduction measures and the (lack of) enforcement of emission reduction rules
- A wide variety of other concerns included:
 - slow action and implementation
 - low engagement with the public
 - o measures restricting freedom of movement
 - funding

"Concern is it will not lead to any change because it is vague ambitions and Brent has a track record of failure to enforce eq engine idling."

"Implementation date?"

"Apart from the Action Plan, what else is Brent Council doing?"

"Could be more accessible in its delivery."

"Yes, I'd like to raise children in the council but failing to see improvements in the next 5 years will lead me to leave the area and raise them somewhere else."

"I want to know what will be done to reduce the very high number of HGVs driving across Harlesden high street every day."

"Concerns that pollution and traffic will simply be pushed onto other residential areas."

"Are the planning permission/ environment and noise team on board with it?"



How the Council can support residents in improving air quality in Brent

People were asked what things the council could do to support residents to play their part in improving air quality in Brent. 73 people shared their thoughts.

- A quarter of people mentioned actions to deter residents from producing emissions, as well as incentives to promote low emissions activities
- A similar number of people suggested more education and awareness about air quality, including information about measurements of pollution levels in the area
- Nearly one in five people also suggested encouraging active travel, through more and better cycling lanes and pedestrian areas
- A small number of suggestions related to the improvement of the infrastructure and better public transport
- Other suggestions included:
 - o better waste management and recycling
 - o electric charging points
 - o better insulation for homes
 - more green spaces

"More protected cycle lanes."

"Bonfires and home wood burners should be actively discouraged."

"Provide ENORMOUS subsidies to insulate the cheaply built terraced houses of Brent pre-1919."

"Make better and safer bike routes with better traffic management."

"Monetary incentives to assist in transitioning to cleaner solutions."

"Raise awareness and educate people. Drivers need to be more thoughtful. All steps need to be enforced."

"Rubbish. It's the smell that's wrecking the air pollution in Brent."

"Provide more green spaces, plant more trees and build less blocks of concrete flats destroying green spaces and impacting on all local services."

"School streets should discourage school runs, not just shift drop off points. Head teachers need to be more engaged."

"Grants for plants."



Additional feedback from the community forum meetings

During the virtual forums, two additional questions were asked using Mentimeter (an interactive app which allows for people to share their views in real time) which were not asked on the online survey.

What does air quality mean to you?

The word cloud below show the words most frequently said, with "Health" and "Breathing" being the most commonly mentioned.



What action would you like to see us take on air pollution in the borough?

82 people responded, and their comments were similar to those expressed in the online survey.

- Many comments referred to the need for urgent action
- Another common theme was about measures to reduce and control traffic in the borough
- Enforcement of parking measures were also mentioned
- Other suggestions included:
 - o more school streets
 - more cycling and walking areas
 - o less woodburning
 - education and awareness



Questions raised, and any other comments and reflections

At the end of the survey, and at the end of the online and in-person forums, people were asked if they had any other comments or reflections. In addition, some people left questions or comments regarding the draft plan on question forms which were made available for people to voice their questions during engagement events. Together these added up to 154 comments, which covered a wide variety of topics:

Of those comments that related to the draft plan itself:

- About a quarter of people were critical of the plan, either because they disagreed with certain priorities or because they felt it was too weak
- About one in ten people expressed positive feedback on the plan, with some people adding that it was educational, or offering their thanks to the Council for their efforts
- About one in ten people left a comment with a specific suggestion about the plan or its priorities
- Some people suggested that the most important thing would be to take urgent action on air quality
- Some people made comments which offered other suggestions on the plan or on the council's priorities to address air quality
- Others expressed a desire for the Council to encourage active travel
- A few people said that the plan should be more ambitious
- A small number of people said that it needed to be clearer or more specific

Quite a few comments did not speak to the draft plan directly and instead addressed other topics, ranging from open-ended questions; challenges facing specific streets; active travel and public transport; ULEZ; people's experiences with local organisations; disturbances from construction; and feedback on the leaflet.

The themes of these comments are highlighted with the following quotes:

"Electric scooters - are they barred?"

"Are other boroughs going to do the same? Is there going to to be any joint work with other boroughs as Brent is surrounded by a lot of major boroughs."

"Consider suggestions."

"New developments have new open plan kitchen - need good ventilation in all homes."

"All very interesting and going in the right direction. Communication is important to all age groups. All starts with individuals doing their part."

"Focus on businesses and manufacturers. Put air pollution alerts in schools."



"If you live on a street with high traffic you should not leave your window open as the pollution will damage your lungs leading to early death."

"Prioritise pedestrians."

"Feeling the residents are way ahead of the council."

"Thanks and all best wishes for your efforts. It's tough but VITAL."

"Make it happen now!"

"In the current form it in just pointless greenwashing."

"Please prioritise funding and action in this area - the statistics about impact on health are very worrying, especially for a mother with young children."

"I look forward to its adoption."

"AQAP could be a real opportunity for change, this draft will not achieve that."

"Good Plan. The next version should be more ambitious."

"Thank you for doing this. I wish we could see less cars with only one occupant and more green buses and cycling paths (safe park walks)."

"Disappointing and unambitious."

"More in hope than feasibility."

"It's weak. Really bad. Lots of aspiration but very limited action."

"It needs to be a lot less jargon driven."

"Needs to be delivered in full."

"Very informative, easy to read."

"Every citizen is affected by our effort for improved air quality and yet only a dozen folks turned up to this consultation. Making clear and attainable each individual's impact on air quality should be a priority. Educate the public."

"Despite the frustrations we do appreciate you working on this."



Feedback from Stakeholder Groups

The following stakeholder groups and organisations sent in a response to the draft Action Plan:

- Environment Agency
- Canal & River Trust
- Mums for Lungs

The complete comments are appended to this report (see Appendix 1), but here are a few main points:

- **Environment Agency** did not give either positive or negative feedback on the draft Action Plan. EA expressed regret that they are not able to provide detailed comments on the Action Plan, but they provided a summary of issues/priorities which should be common to any air quality action plan. These include:
 - Adherence to various UK and EU policies
 - o An outline of the EA's preferred posision for any Air Quality Action Plan
 - o The necessity of working in partnership with transport policies and practices
 - Mitigating impacts of poor air quality resulting from new development
 - Guidance on the use of Non-Road Mobile Machinery
 - Encouraging the enclosure of waste handling sites

The Environment Agency's response also offered a point of contact for Brent to have a representative at the North London Air Quality cluster group, and indicated the Environment Agency would maintain a regulatory eye on specific waste activities in the borough.

"We suggest that any new air quality action plan adheres to the principles in the London Plan and Air Quality policy SI 1, including air quality neutrality and air quality positive, as well as the relevant SPD's. The plan must also help to bring local air quality below EU limit values for local pollutants- in particular PM10, PM2.5 and NO2, as expressed in the EU Air Quality Directive and implemented in the UK through the 2010 air quality regulations.."

- Canal & River Trust expressed their support of the sections of the draft plan which
 address cleaner transport modes, and suggested a few specific points where they felt
 the plan could be expanded to include further actions on this. These included:
 - Improvements to the Grand Union Canal towpath, as part of CT8, Provision of infrastructure to support walking and cycling
 - Partnering with Canal & River Trust to complete towpath improvements along specific routes, as part of the delivery of RA7.2, Clear Air Route Finder
 - Additional opportunities for electric mooring for canal boats

The Canal & River Trust also offered their led walks programme as a way to increase resident confidence.



"We're supportive of enabling cleaner transport modes, particularly active travel, and are keen to improve towpaths, accessibility and wayfinding, through Brent. Our particular focus is to be able to complete towpath improvements along the Paddington to West Drayton Quietway route, between Acton Lane and the North Circular on the Paddington Arm of the Grand Union Canal, subject to funding and we'd welcome a partnership approach to working with Brent Council to deliver this."

Mums for Lungs welcome the proposals outlined in the draft AQAP, but expressed
concern over the absence of clear air quality targets and emphasised that reducing the
number of miles driven in Brent should be the overarching priority of the Action Plan.
They expressed disagreement with the emphasis on EV charging points, believing
these should be a minor focus rather than a major goal.

Additionally, the group listed several actions which Mums for Lungs recommends be prioritised:

- Ending new parking permits for diesel vehicles
- Expanding CPZ to the entire borough
- Increasing car parking charges
- Reducing on-street parking every year and increasing the creation of parklets
- Creating new School Streets
- Adopting a 20mph limit in residential streets
- Building new protected bike lanes
- Increasing the number of secure bike hangars and reducing rental price
- Delivering a campaign on impact of wood burning on health

"Mums for Lungs welcome the proposals listed in the Air Quality Action Plan 2023-27. We can see that the Brent administration has made significant strides with regards to understanding the severity of the public health crisis that affects every single one of the 340 000 Brent residents, whatever their age. [...] However, the absence of clear air quality targets in the Draft AQAP concerns us. [...] We are keen for Brent Council to show leadership in tackling air pollution for the sake of its children and other vulnerable residents. We would be happy to support an ambitious Clean Air Action Plan when it materialises."



Appendix 1: Views from Stakeholder Groups

Canal & River Trust

Text of response letter from Canal & River Trust:

Brent Council
Planning and Regeneration, Brent Civic
Centre
Engineer's Way
Wembley
Middlesex
HA9 0FJ

Your Ref N/a Our Ref CRTR-POL-2023-38713 2nd May 2023

Dear Sir/Madam,

Proposal: Brent Air Quality Action Plan 2023-27 Consultation Draft

Waterways: Grand Union Canal, Brent Feeder, Brent Reservoir (Welsh Harp)

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Within LB Brent the Canal & River Trust owns and manages the Grand Union Canal, and the Brent Reservoir (also known as the Welsh Harp) as well as some of the Brent Feeder that runs from the Brent Reservoir down to the Grand Union Canal (but runs through many other site ownerships along its route).

We have read the consultation documents and have the following general advice:

Page 55

We are pleased to note that infrastructure for walking and cycling is supported. Under the Action Plan for CT8 "Provision of infrastructure to support walking and cycling" we would add that improvements to the Grand Union Canal towpath, and accesses to it (as well as to the Brent Reservoir/Welsh Harp) would also support this. Wayfinding to these local amenity assets should also be included.

Page 71

RA7.2 Embed a Clean Air Route Finder on Brent's website. Publish guidance on options for low-pollution routes for walking/ cycling, alternative travel and other action to be taken on high pollution days on the website.



We're supportive of enabling cleaner transport modes, particularly active travel, and are keen to improve towpaths, accessibility and wayfinding, through Brent. Our particular focus is to be able to complete towpath improvements along the Paddington to West Drayton Quietway route, between Acton Lane and the North Circular on the Paddington Arm of the Grand Union Canal, subject to funding and we'd welcome a partnership approach to working with Brent Council to deliver this.

We'd also welcome opportunities for electric mooring for canal boats where these facilities are developed and operated by land developers or other third parties. We have some examples around our network in London.

The Trust can also support increasing resident confidence in walking through our led walks programme along the canal. More information is available on our website, but please feel free to contact me if you would like specific details: https://canalrivertrust.org.uk/enjoy-the-waterways/walking/canal-and-river-walks-near-me

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Claire McLean MRTPI Area Planner London Claire.McLean@canalrivertrust.org.uk

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

Canal & River Trust Planning Team
Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road
Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW



Environment Agency

Text of response letter from Environment Agency:

Dear London Borough of Brent Council Pollution Team,

Thank you for the opportunity to comment on your Air Quality Action Plan 2023-2027. In future it would help if you can send requests for consultations to our National Customer Contact Centre (Email enquiries@environment-agency.gov.uk) so we can coordinate a response for you. Unfortunately, we are not able to provide detailed comments on every Air Quality Action Plan we receive so we have compiled a summary of the issues/priorities that we feel are common to each air quality action plan and where possible/appropriate, we have made borough specific comments.

General Air quality has a significant role to play in the health and wellbeing of communities and the prospects of the natural environment, reducing both life expectancy and biodiversity in heavily polluted areas, and otherwise impacting upon the perception of the quality of life and amenity offered by the area. For example, figures show that there are between 3,600 to 4,100 early deaths per year in Greater London due to air pollution.

The Environment Agency – our role in Air Quality We have a number of duties related to air quality:

- 1. We ensure that the industrial facilities we regulate comply with the Environmental Permitting (England and Wales) Regulations 2016, thus contributing to compliance with:
 - UK requirements such as the UK Air Quality Strategy, the Countryside and Rights of Way Act and the Natural Environment and Rural Communities Act; and
 - EU requirements on the UK such as Air Quality Directives, Habitats Directive, the National Emissions Ceiling Directive and the Industrial Emissions Directive.
- 2. We support local authorities in improving local air quality, particularly through providing technical guidance on behalf of Defra to local authorities in respect of industrial facilities they regulate.
- 3. We coordinate ambient air quality monitoring for incidents that may have a significant impact on air quality.
- 4. We were not generally responsible for assessing or monitoring ambient air quality until April 2016 when we took on the contract management of the latter in the form of the ten monitoring networks that were formally managed by Defra.

The Environment Agency is committed to working with local authorities and to play our part fully in Local Air Quality Management (LAQM). We have found that several sectors we regulate under the Environmental Permitting Regulations have the potential to affect air quality negatively. Nationally some individual installations in these sectors have already been found to contribute significantly and we have been working with the affected local authorities for some time to implement the necessary improvements. Installations we regulate may be covered by freestanding Air Quality Action Plans or ones, which are transport-related and incorporated into Local Transport Plans.

We suggest that any new air quality action plan adheres to the principles in the London Plan and Air Quality policy SI 1, including air quality neutrality and air quality positive, as well as the relevant SPD's. The plan must also help to bring local air quality below EU limit values for local pollutants- in particular PM10, PM2.5 and NO2, as expressed in the EU Air Quality Directive and implemented in the UK through the 2010 air quality regulations.

Preferred Position -

In principle any Air Quality Action Plan should;

- 1. Have a clear commitment to meeting the relevant air quality standards;
- 2. Clearly state the current status of air quality within the borough;



- 3. Clearly report on the progress against targets set out in any previously published Air Quality Action Plan (if appropriate);
- 4. Where the borough does not meet the relevant air quality standards, they should clearly detail what mitigation measures will be used to ensure compliance with air quality standards in the shortest possible time period. It should ensure that compliance is not just 'possible' but 'likely':
- 5. Make clear what other organisations the borough is working with/planning to work with to implement improvement measures (as in 2 above), and what they are agreeing to deliver; 6. Include basic costs required to implement the required mitigation standards and compare against the level of funding available;
- 7. Take steps to ensure the measures in the Mayor of London's SPDs on sustainable design and construction or any update thereof to an equal or higher standard are implemented into the air quality action plan; In particular this should include:
 - Require all new buildings be constructed and designed in a manner that minimises emissions of pollutants to the air both during construction and demolition and postconstruction, making new development 'air quality neutral' or better;
 - b) In the case of a major development, include an air quality assessment (as set out in the Mayor of London's SPDs on sustainable design and construction, or update thereof, to an equal or higher standard) that considers the potential impacts of pollution from the major development and on neighbouring areas during construction and operation, including development related traffic and the potential for exposure to pollution levels above:
 - c) Implement any policies on transport which pertain to improving air quality;
 - d) Require any waste transfer stations to be in a building, enclosed on all vertical sites with small access and egress points covered by doors which default closed when not in use and an air extraction and filtration system to collect particulates as per London Plan Policy SI 8 E 4;
 - e) Require all industrial sites that use non road going mobile machinery to meet the latest NRMM standards on the date of purchase, or hire;
- 8. Contribute to achieving EU established health-based standards and objectives for the relevant air pollutants (particularly NO2, PM10, and PM2.5);
- 9. Take steps to ensure measures in the Mayor of London's London Environment Strategy (LES) are fully adopted by your Air Quality Action Plan.

Traffic -

Where there is a significant incidence of poor air quality within and adjacent to the area of concern (and in most cases this is directly attributable to emissions from road traffic) air quality policies must work in partnership with transport policies but also the authorities' own fleet procurement policies, and partner authorities/ organisations.

Developments -

Any new development, particularly in air quality 'hotspots' or development 'Opportunity areas', will need to consider how they mitigate the impacts of poor air quality. During construction the main air quality effects from development are anticipated to result from emissions of oxides of nitrogen (NOx) and fine particulate matter and dust (PM10 and PM2.5) emanating from an increase in road traffic, and from traffic management schemes. Therefore, mechanisms for minimising air pollution will need to be closely tied into the transport policies in the London Plan and London Environment Strategy.

Major developments planned within the borough will need to significantly mitigate their emissions and thus contribute towards improving local air quality as per the requirements of Air Quality Neutral and Air Quality Positive. This is particularly the case where they include potentially new sources of emissions such as biomass boilers, data centres, diesel array power generation, combined heat and power plants, and increased traffic-generated emissions. The effects on air quality during construction will also need to be managed, both



in terms of emissions that generated from traffic, and from the treatment and processing of material from demolition and excavation.

Construction and demolition works should be required to meet or exceed the requirements set out in the Institute of Air Quality Management's Guidance on the 'Assessment of Dust from Demolition and Construction' or the Mayor of London's published supplementary planning guidance on 'Sustainable Design and Construction', and the 'Control of Dust and Emissions' during Construction and Demolition or published updates thererof. We are also aware that Air Quality Neutral, Air Quality Positive and 'Agent of Change' policies can affect existing industrial sites we regulate where they are within or adjacent to new development. In these cases, we encourage early contact with our relevant officers.

Non-Road Mobile Machinery -

Where a commercial or industrial site involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during construction. and/ or operation, and/ or demolition at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection.

Waste Management Sites -

Waste management sites are a potential source of dust and fine particulate emissions to air. Those sites which mitigate the potential effects of air pollution by enclosing processes within buildings tend to be far less polluting and enclosure is now recognised as best practice for such sites. Consequently we encourage any new air quality management area declaration, Air Quality Action Plan and/or proposed Clean Air Zones to require the further enclosure of existing waste handling sites and expect future waste development to be fully enclosed within buildings to minimise health impacts, improve amenity, and contribute towards improving air quality.

Regional Approach to Local Air Quality -

It is recognised that the London borough of Brent will need to work with others on the implementation of the measures necessary to address poor air quality as the matter is not confined to one planning authority area, and development is often governed by separate regulatory regimes and legislation, such as building regulations and environmental permitting. It would be helpful if there was a Brent Borough representative at the North London Air Quality cluster group, with representatives from adjacent boroughs, the Environment Agency and the Greater London Authority. Please contact Alan Urguhart @ alan.urguhart@walthamforest.gov.uk for attendance information.

Summary –

It is important to note that we are not aware of any waste facilities or other industrial installations regulated by the Environment Agency in the London borough of Brent that are causing or contributing to failures of air quality standards, but we maintain a close regulatory eye on the waste activities at Neasden Goods yard and those in the vicinity of Wembley stadium on Hannah Close and the local roads.

If you have any questions, please do not he sitate to contact me in the first instance.

Kind regards, David Rushton



Air Quality Champion
Environment Management
Hertfordshire and North London
Environment Agency | Alchemy, Bessemer Road, Welwyn Garden City, AL7 1HE
Email: david.rushton@environment-agency.gov.uk

National Customer Contact Centre (8am-6pm) | 03708 506 506 gov.uk/environment-agency National Environmental Incident Hotline (24/7) | 0800 80 70 60



Mums for Lungs

Text of response letter from Mums for Lungs:

2 May 2023

Response to the Consultation on Brent's Draft Air Quality Action Plan (AQAP) 2023 – 27

We are Mums for Lungs, a grassroots network of people campaigning for cleaner air to safeguard the health of children across the UK. Founded in 2017 in Brixton by a group of mothers in response to the toxic levels of pollution locally, we have since expanded. Our ever-growing group of activists and supporters campaign for a reduction in cars, an increase of School Streets, as well as a ban on the sale of new wood burners by 2027.

Air pollution is a major contributor to ill health. It stunts children's lungs, causes and exacerbates asthma and cancer. It is also linked to a wide array of heart disease, dementia, diabetes and even mental health issues.

Sadly, the borough of Brent remains one of the most polluted areas in the UK. Out of three locations in London measured to have the highest concentration of nitrogen dioxide, two of these are located in Brent: in Harlesden High Street, and in Wembley High Road. In short, air pollution levels need to be reduced in our borough as a matter of urgency.

Mums for Lungs welcome the proposals listed in the Air Quality Action Plan 2023-27. We can see that the Brent administration has made significant strides with regards to understanding the severity of the public health crisis that affects every single one of the 340 000 Brent residents, whatever their age. Also, the local enforcement of School Streets by ANPR cameras at the end of last year has given us a renewed sense of hope that Brent is serious about tackling air pollution.

However, the absence of clear air quality targets in the Draft AQAP concerns us. Without any clear estimates of the impact of individually proposed activities, or a tight net of monitors across the borough, it remains unclear if and how the 37 actions outlined in the report will result in a quick and significant reduction in air pollution.

In order for Brent council to clean up the air for good, we believe that reducing the number of miles driven in Brent should be the overarching priority of Brent AQAP, in keeping with the Brent Climate & Ecology Strategy 2021-2030. According to this report, diesel and petrol journeys need to be at least halved by 2030. We are yet to see a pathway towards achieving this important target.

For the next AQAP to have the much-needed significant impact, Mums for Lungs recommend that the borough prioritises the following actions to ensure fewer and cleaner cars across the borough, and a reduction in pollution from wood burning:

- ending the supply of new parking permits for diesel vehicles, which remain extremely polluting despite car manufacturers' claims;
- expanding Controlled Parking Zones (CPZ) to the entire borough;



- increasing car parking charges, especially for the biggest and most polluting cars;
- reducing on-street parking every year, and increases the creation of parklets and other green public spaces;
- creating new and effectively enforced School Streets;
- adopting and enforcing a 20mph speed limit in all residential streets;
- building new protected bike lanes across Brent;
- increasing the number of secure bike hangars, and reduce their rental price;
- delivering a strong awareness-raising campaign on the impact of wood burning on health.

The installation of EV charging points - presented as both a major achievement of the 2017-2022 Air Quality Action Plan, and the way forward - is not in itself sufficient to ensure significantly improved air quality, carbon reduction, or increased active travel. EV charging points can therefore only be a minor focus in the endeavor to clean up Brent's toxic air.

We are keen for Brent Council to show leadership in tackling air pollution for the sake of its children and other vulnerable residents. We would be happy to support an ambitious Clean Air Action Plan when it materialises.

Yours sincerely,

Amandine Alexandre, Brent resident and Mums for Lungs campaigner Jemima Hartshorn, Founder and Director Mums for Lungs

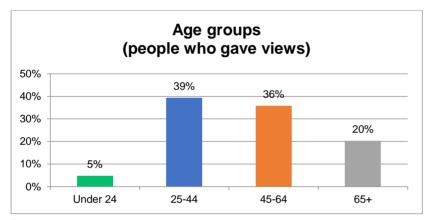


Appendix 2: Profile of who shared views

A total of 92 people shared their views through the survey. 65 of these were self-completed online, while 27 were completed on paper during the engagement events.

Age

Age	2021 Census	People who gave views
<24	22%	5%
25-44	37%	39%
45-64	27%	36%
65+	13%	20%
Base	n/a	84

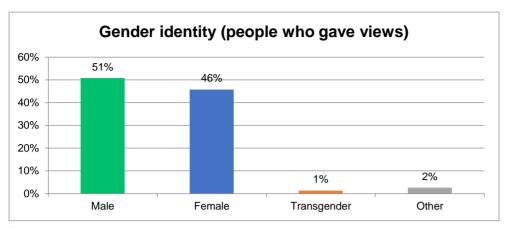


Base = 84

Gender identity

Gender identity	2021 Census	People who gave
		views
Male	49%	51%
Female	51%	46%
Transgender	1%	1%
Other	n/a	2%
Base	n/a	81



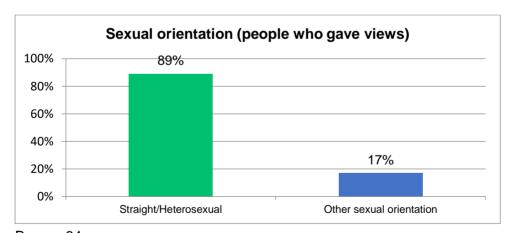


Base = 81

Sexual orientation

Sexual orientation	2021 Census	People who gave views
Straight/Heterosexual	96%	89%
Other sexual orientation*	4%	11%
Base	n/a	64

*The response options in the 2021 Census options were: Gay or Lesbian, Bisexual, Pansexual, Asexual, Queer, and All other sexual orientations. The response options in the public survey were: Gay or Lesbian, Bisexual, and Other sexual orientation.



Base = 64

Disability

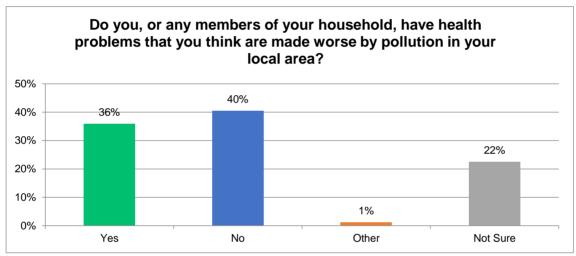
11% of people engaged considered themselves to have a disability or health problem that affects their daily activities (75 people answered this question). According to the 2021 Census), 12% of Brent's population has a disability under the Equality Act which limits day-to-day activities.



Disability	2021 Census	People who gave views
Yes	12%	11%
No	88%	89%
Base	n/a	75

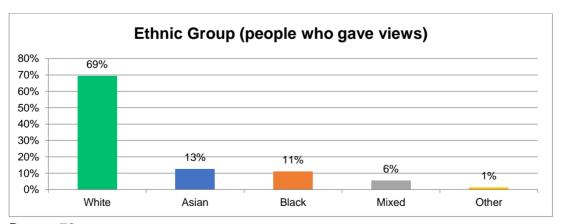
Health

36% of people believed they or a member of their household had health problems made worse by the pollution in the local area.



Base = 89

Ethnicity



Base = 72

Ethnicity	2021 Census	People who gave views
White	35%	69%
Black	18%	11%



Ethnicity	2021 Census	People who gave views
Asian	33%	13%
Mixed & Other Ethnicities	15%	7%
Base	n/a	72

Religion

What is your religion (if any)?	2021 Census	People who gave views
No religious belief	15%	30%
Christian, including Catholic	42%	31%
Agnostic	n/a	13%
Hindu	17%	8%
Muslim	23%	5%
Humanist	n/a	5%
Buddhist	1%	3%
Jewish	1%	3%
Other	1%	3%
Base	n/a	64

Children

Over half of people (58%) said they had no children living in their household, while 42% had one more more children living with them.

Do you have children that live	People who
with you?	gave views
None	58%
Pre-school	15%
Primary school age	15%
Secondary school age	10%
Over age 18	14%
Base	81

Employment

Two thirds of people (68%) were economically active, while 20% were retired.

Which of these best describes what	2021	People who
you're doing at present?	Census*	gave views
Full Time work	59%	48%
Part Time work		6%
Self Employed		9%



Zero-hours contract		2%
Looking for work	5%	4%
Retired	12%	20%
Looking after the children/elderly/the home	7%	5%
Full Time Student	8%	2%
Unable to work	4%	5%
Other	5%	n/a
Base	n/a	82

Housing Tenure

A significant majority (76%) of people who responded own their home, 15% rent from a social landlord (council or housing association), 9% rent from a private landlord and 1% have other living arrangements.

Which of these best describe the	2021	People who gave
home you live in?	census	views
Own it outright/buying with a mortgage	40%	76%
Rent - council	24%	10%
Rent - housing association		5%
Rent - private landlord	36%	9%
Other	n/a	1%
BASE	n/a	82

Connection to Brent

96% of people live in the borough, 18% work in Brent, 4% have another interest, and 3% run a business. A breakdown is also shown in the table below (multiple responses were possible).

What is your connection to Brent	People who	People who
	gave views	gave views
	(count)	(%)
Live	86	96%
Work	18	20%
Run a business	3	3%
Member of Brent Council staff	1	1%
Local Councillor	2	2%
Have another interest	4	4%
Base (multiple responses were possible)	114	90

How much views have been consulted before



56% of people who responded said that their views had never been consulted before (27%) or not much (29%). 21% said their views had been sought a little previously and 23% said they have been consulted quite a bit or a lot.

How much have your views about the Borough been consulted before?	People who gave views (%)
Not at all	27%
Not much	29%
A little	21%
Quite a bit	18%
A lot	5%
Base	84

Postcodes of people who shared their views

The number of people who shared views by postcode of residence is shown in the table below:

All valid shortened postcodes	Number of
in Brent (alpha sort)	people
HA0	7
HA8	2
HA9	9
N16	1
NW10	34
NW16	1
NW2	14
NW26	1
Nw6	11
NW66	2
NW67	2
NW9	5
SE16	1
Total	90



Appendix 3: Q&A – Brent Council responses to questions raised during Residents' Forums

Brent Air Quality Action Plan Residents' Forum – Question and Answer

Question 1: Exceeding WHO air pollution limits is appalling in C21st Brent. Lorries, planes, trains, cars, motorcycles, buses, industry, fossil fuels from homes too plus building works....what exactly are the statistics for affected people of all ages in Brent?

Answer 1: At present we do not have the data on number of residents living in areas of poor air quality split by age bands. However, Appendix A of the draft Air Quality Action Plan (from page 87) details the number of schools, nurseries, GP Surgeries, care homes and residents exposed to different pollution levels for both 2019 (baseline) and a projection for 2022 for NO2, PM10 and PM2.5.

Question 2: How many of our children have asthma?

Answer 2: Within Brent, there are over 18,000 people who suffer with asthma, almost 2,500 of whom are children.

Question 3: Which areas in Brent are the worst in terms of Air Quality?

Answer 3: As part of the review of the Air Quality Action Plan, a thorough review was undertaken of pollution levels across the borough. Based on this, Air Quality Focus Areas (AQFAs) have been identified as areas with the highest level of pollution in the borough. The map of AQFAs can be found on page 32 of the draft plan.

Each year the borough publishes air quality monitoring data, which can be downloaded at: Air Quality Annual Status Report. In the 2021 report, Harlesden High Street was identified as having the highest monitored concentration as an annual average. Air pollution levels fluctuate constantly due to variables such as the weather and levels of congestion so it isn't possible to determine where pollution is worst at a given time but the annual status reports show averages and provide information on where hotspots exist within the borough.

Question 4: What action will be taken to improve non-polluting transportation? For example, safe and inviting bike lanes/roads, bike storage, broader walking pedestrian friendly high streets?

Answer 4: Action CT8 (pg 55) is "Provision of infrastructure to support walking and cycling".

To do this we will:

- Incorporate the Healthy Streets approach into the Local Implementation Plan, making sure all public realm improvement schemes prioritise walking/ cycling infrastructure. For example we have recently delivered improvements at Kensal Rise, providing an improved environment for walking and cycling. Wembley High Road and Church End Public Realm Improvement schemes were also completed in the autumn providing new wider high quality footpaths, safer pedestrian crossings, lighting, street trees and greening as well as cycle parking. There are also plans for a public realm improvement scheme at Kilburn High Road (Kilburn Underground Station to Willesden Lane).
- Work with TfL to implement active transport infrastructure. For example we are working with TfL on the Wembley to Willesden Junction Cycleway (CFR23), more information can be found at: Wembley to Willesden Junction walking and cycling changes | Have Your Say Transport for London (tfl.gov.uk). We have also installed over 100 bike hangars for our



residents to use with more planned, aiming it easier for residents to store their bikes securely. We are also committed to making it easier to navigate the borough on foot, for example we aim to delivery way-finding "Legible London" projects.

- Work with planning team to ensure that all major developments implement site permeability measures to facilitate and enhance active travel routes within the borough in line with air quality positive measures

In addition, the council is in the process of developing an Active Travel Implementation Plan which include details of new/improved cycling and walking links and supporting infrastructure required to improve cyclist/pedestrian safety and accessibility and to encourage more journeys by these modes. There will be a consultation on the draft Active Travel plan in 2023.

Options are also being considered on how best to adapt street design that supports active travel as part of regeneration masterplans in our growth areas such as Church End and Staples Corner.

Question 5: How are we going to reduce vehicle movements in the Borough? Why is the reduction in driven miles not a part of the AQAP?

Answer 5: Brent has recently adopted a new Long Term Transport Strategy which specifies targets for reducing traffic, and aligns with the draft Air Quality Action Plan. Within this there is a target to reduce overall traffic levels by 10% by 2041. The Long Term Transport Strategy outlines that this will be achieved by:

- Traffic Management/ Reduction Measures
- 'Behaviour Change' Initiatives
- Public Transport Initiatives
- Cycling/Walking Scheme

The Long Term Transport Strategy can be found here Brent Long Term Transport Strategy Review 2022

Question 6: What action will be taken to inform the public of what the local particulate measurement is, teach the general public of the language for measuring/describing our air and what their own actions do to improve or harm our sir quality.

Answer 6: Theme 3 in the draft AQAP is centred on public health and awareness raising. As part of this, we will ensure that Public Health officials are actively involved in air quality engagement with local stakeholders (businesses, schools, community groups and healthcare providers) and effectively communicate the health impacts of PM2.5. We will also be introducing a rolling plan of air quality pop-up events in Air Quality Focus Areas, with information tailored to the local area which will help to share this information.

Question 7: Will there be any action available to individuals holding barbecues — example, our meat loving neighbours hold long summer parties in their garden but all their smoke flows straight into our home such that in spite of the hot weather we must close all our windows and that still doesn't keep their smoke out. Polite direct request has only aggravated relations.

Answer 7: Bonfires can be reported through the statutory nuisance process. Within the draft AQAP we have included the following action to help tackle this:

Reduce bonfires and waste burning, for example through improved information of garden waste services and provide advisory and enforcement interventions where applicable



Question 8: How is engine idling enforced in the borough?

Answer 8: Idling is tackled in the borough through a behaviour change engagement programme. Idling events are held at hotspots (e.g. where we have received complaints). Enforcement officers are trained on the issue and are able to issue Fixed Penalty Notices in the event that a driver does not switch off their engine. The draft AQAP contains a target of holding one idling event per month.



Appendix 4: Questionnaires used in outreach and online surveys

Please contact healthystreets&parking@brent.gov.uk for copies of the questionnaires used in outreach.

Appendix 5: Outreach Materials

Please contact healthystreets&parking@brent.gov.uk for copies of outreach materials