

Submission regarding Air Quality issues in Enfield's New Local Plan, as identified by the EnCAF Air Pollution Working Group

Enfield Council's response to our initial submission referred us to ENV1 and Integrated Impact Assessment IIA as evidence that our concerns were answered. Having studied again the IIA we are providing further evidence that the Local Plan does not address important aspects on the issue of air pollution, as follows:

Positive effects on air pollution are at best uncertain, and possibly mostly significantly negative

1. Integrated Impact Assessment (IIA) Paragraph 26 (Air Pollution) states:

"Facilities are also within close proximity of one another and so locating development in the urban area is likely to encourage walking and cycling, which can minimise air pollution. Therefore, all options are expected to have significant positive effects in relation to air pollution."

But this relies on behaviour change of people, which is well known to be difficult to achieve. The plan does not indicate how these changes could be achieved and what alternative measures can be put in place in case people will not give up driving cars.

The following sentences in the same paragraph shows that it is expected that all options are expected to have significant negative effects on air pollution.

"However, the entire Borough is designated an Air Quality Management Area. Further to this, the amount of development proposed by all options is expected to have significant adverse effects on air quality through population increase and a higher presence of cars. Some options also support development in the Green Belt, where access to public transport is not as easy. People in these locations may be more reliant on the car, which can have adverse effects on air quality. **Overall, all options are also expected to have significant negative effects in relation to air pollution.**" (bold letters added).

2. The negative impacts on air pollution are further highlighted by Paragraph 27 (Sustainable Transport):

"As all options focus some development in the urban area with easy access to public transport, they all receive significant positive effects in relation to sustainable transport. **The effects are recorded as uncertain, as uptake of walking and cycling is dependent on people's behaviour.** (bold letters added) A small number of the options also receive minor negative effects in relation to sustainable transport (2B, 2C, 3C, 3D, 8 and 9), as they support development in the Green Belt where access to public transport is not as good. Subsequently, residents are more likely to be reliant on the private car."

In addition, there is no information on how Enfield plans to ensure that sustainable transport, and especially public transport, becomes readily available, especially in areas which do not have it. We believe that without firm commitments from TfL to introduce new public transport in areas which are deficient, as well as to increase the number of trains and buses in areas which will see an increase in population, the result will be an increase in private car traffic and thus air pollution. This agreement from TfL should become an additional criterion to assess the viability of the sites proposed for development.

3. Thus, the assessment results as presented in Table 2 show that in terms of air pollution, all options, including the ones preferred by the council, are to result in

“mixed significant positive and significant negative effects”. (bold letters added). However, as stated above, the significant effects are expected to result from a change in people’s behaviour, *which is recognised as an uncertain effect in paragraph 27*. From this we conclude that the positive effects on air pollution are at best uncertain, and certainly not significant. As a result, the measures proposed are insufficient to mitigate the air pollution at a significant number of sites.

4. Assessment criteria

Appendix B: Table B.2: Amendments to the site assessment criteria and assumptions

Referring to Air Pollution it is stated that: “Criteria amended to look at NO₂, PM₁₀ and PM_{2.5} pollution levels in relation to the latest WHO air quality guidelines for air pollutants (2021), as well as the UK’s national air quality objectives.”

Whilst this is a welcome change, we are extremely concerned about the ability of the council to implement these assessments, given the paucity of assessment tools at its disposal. Specifically, we are concerned about the lack of human resources needed to supervise, monitor and intervene when needed (there is only one council officer dealing with all issues of pollution in Enfield) and insufficient monitoring tools to establish the situation on the ground.

The council has a limited number of monitoring sites for NO₂ (compared to other London boroughs), whilst the only automatic monitor for PM₁₀ has broken down and has not been replaced. Furthermore, there is no automatic monitor for PM_{2.5} in the whole of Enfield, and nothing is published officially about the results of the two PM_{2.5} sensors funded by the Mayor of London, whilst their continued deployment is now under question mark.

Moreover, areas recognised by the council as being particularly vulnerable to air pollution, such as Edmonton Green and Meridian Water have no monitors whatsoever, and no indication is given in the local plan documents that air quality monitors will be deployed at these sites.

This does not bode well for the future of a thorough and effective assessment of air pollution in Enfield in general and around the proposed development sites in particular.

5. Objective 11: Minimise Air Pollution

Although this is a stated objective, the IIA does not provide clear answers on how Enfield Council intends to achieve this it. The impression is that with respect to air pollution the council relies on national and regional legislation to solve the problem. Appendix B of IIA (Objective 11- minimise air pollution) states that: **“The effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the IIA. This will be informed by air quality modelling being carried out on behalf of the Council by third party consultants**. However, the Local Plan, including the chapter on cumulative effects, is failing to address the issues raised by the Air Quality Consultants, as stated in the original submission by EnCAF’s Air Pollution Working Group. [The Air Quality Assessment](#) found that only 4 sites (streets and schools) would experience moderate beneficial effects in terms of PM_{2.5} pollution, whilst the rest of 84 sites will experience adverse effects, ranging from slightly

adverse (5 sites) to moderately adverse (61 sites) and substantially adverse (18 sites). The Local Plan provides no response to these projected effects.

In Appendix C of IIA, it is stated that Enfield will be guided, among others by the national 25 Year Environment Plan around which action will be focused on protection of air quality by “Embedding a ‘net environmental gain’ principle for development, including natural capital benefits to improved air and water quality”. With the exception of the 4 sites mentioned above, we see nothing to demonstrate that there is environmental gain in terms of air quality in the Local Plan.

Moreover, in its concluding remarks on overall impacts (Conclusions on the total effects of the policies in the Local Plan), it is stated that with regards to carbon emissions “the overall scale of growth that is proposed to be delivered in Enfield will inevitably result in increased carbon emissions from buildings, commercial activities and road traffic, despite the strong mitigation that is built into the Plan”. And with regards to Objective 11 – Minimise Air Pollution – it is stated that “The likely cumulative effects of the Local Plan on IIA11 and 12 are summarised together, due to the close linkages between air pollution and levels of car use – for many of the policies, the likely effects on these two objectives are the same.” And yet the concluding phrase is that (7.36) **“Overall, the Local Plan is expected to have minor positive (+) effects in relation to achieving IIA objectives 11 and 12 (sustainable transport).**

Conclusion

Given all the above, we conclude that the Local Plan has a blind spot with regards to Air Pollution and requires serious modifications to address the projected increases in air pollutants resulting from the proposed developments.