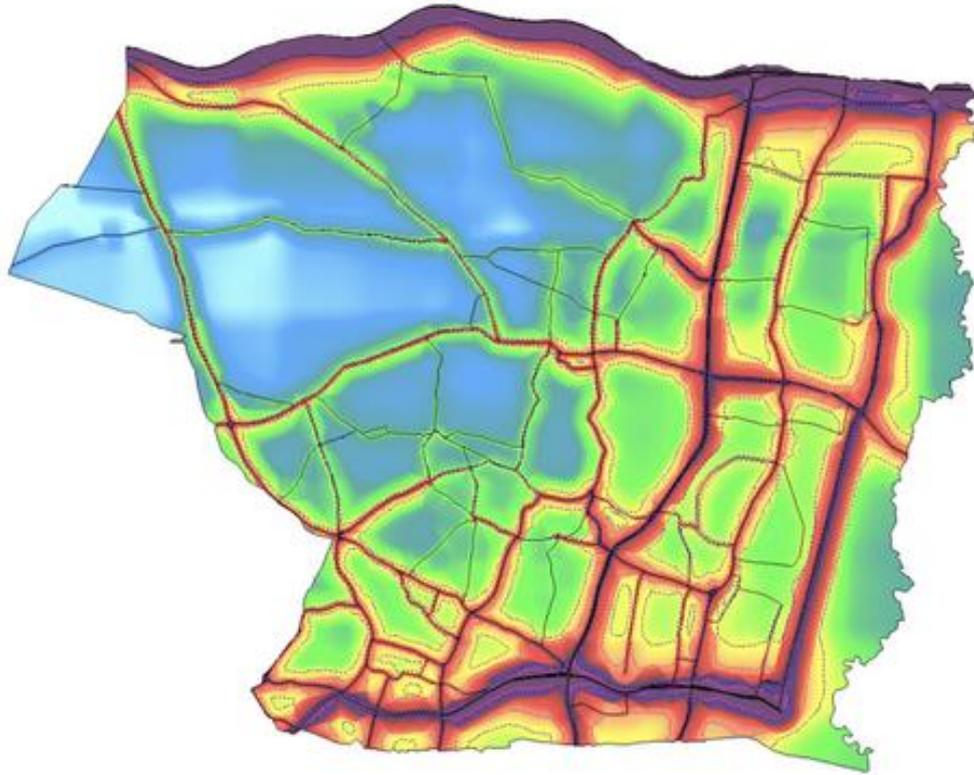


# **Enfield Climate Action Forum (EnCAF): Response to Enfield Council’s Draft Air Quality Action Plan (AQAP) 2022**



## **Introduction**

EnCAF welcome the fact that a new action plan to improve air quality in Enfield is in the process of being developed. As an umbrella organisation which includes more than one hundred affiliated local groups EnCAF sees it as our civic responsibility to contribute to the discussion on how to tackle air pollution in our borough, even though we have not been included in the ‘official’ list of consultees. Our response here is based on the assumption that this initial draft will undergo a number of improvements and we hope that our suggestions and recommendations will help to create an AQAP which incorporates the views and the concerns of the residents of Enfield and not just the statutory requirements expected from the council. We believe that an ongoing public engagement is essential for its progression and successful implementation, and we see our contribution as part of this engagement.

The introduction to the 2022 Draft AQ Action Plan says “We have worked hard to engage with stakeholders and communities which can make a difference to air quality in the borough.” It is thus very regrettable that the Council has failed to widely publicise this consultation or engage with stakeholders in the community in developing this draft plan. We are disappointed that it does not appear on your website under the Consultations section and that Enfield Climate Action Forum found out about it by chance (as it was a tiny item on the Pollution page of the council’s website). We also note that the consultation period coincides with local elections and purdah. We therefore urge the Council to consider ensuring that community groups have further opportunity to feed back to the process when an updated draft AQA report is produced and before it is finalised.

## **Part 1: General Recommendations**

**1.1 Update the sources of information used by this initial draft.** Whilst we commend the “Air Quality in Context” part of the plan, we also found that important information with regards to the Enfield context is now out of date or has been overlooked. We especially recommend that the authors consider the following:

**A. London Atmospheric Emissions Inventory 2019** (the 2016 version is now dated)  
The study of Enfield’s emissions in this updated Inventory shows that a comprehensive approach to air quality in our borough requires full consideration of emissions not only from transport but from other significant sources of air pollution, such as:

- **70% of PM<sub>2.5</sub>** emissions in the Domestic sector come from **wood burning**. A public health campaign to tackle air pollution needs to set some clear actions and targets in this area.
- Engagement with the Industrial and Commercial sector must also be given priority, given that its **nitrogen oxides emissions are roughly equal to the ones from transport – 47%**.
- The same can be said about the Construction sector, as it produces **50% of PM<sub>10</sub>** emissions from the industrial sector.
- **61% of nitrogen oxide emissions from the Industrial sector** in Enfield come from the Edmonton Incinerator (euphemistically described as ‘Industrial Processes Part A1’). It is rather incomprehensible that an AQAP has nothing to say about the pollutants from a waste incinerator which is able to operate in our borough. Such pollutants include not only nitrogen dioxide and particulates but also other toxic substances such as dioxins and heavy metals.
- See also Appendix A below with the GLA key recommendations on PM<sub>2.5</sub> emissions calling for “an increased focus on **non-transport emissions**”.

### **B. Enfield Air Quality Appraisal (Vol. 1, 2 & 3)**

It would also be necessary that the new AQAP takes note of the findings of this independent report from air quality consultants WSP, commissioned by the council. “*Proposed site allocations for development within Enfield were assessed for potential exposure of future occupants to poor air quality*”. In particular it would seem very important that Enfield’s AQAP takes notice of the following findings:

- Out of the total 48 sites designated for development, with a total of 23,428 housing units, 18 sites and 14, 806 housing units would potentially expose future residents to poor levels of air quality. This represents **63% of the total housing units** proposed in the draft Local Plan. (our italics)
- The potential air quality impact on the local area was examined at 65 sites and found that at **38 sites** there will be a **significant negative effect**. (our italics)
- The risk assessment of adverse impacts at designated ecological sites found that 2 sites would be exposed to **moderate risk** (Lea Valley Ramsar, South, and Wormley

Hodderson Park Woods), whilst Epping Forest Special Area of Conservation will be exposed to **high risk** of air pollution (our italics).

- The report also noticed that Council’s “monitoring coverage is limited” and that it was necessary to rely on modelling undertaken by the Greater London Authority for 2016 right across London in order to identify the Air Quality Focus Areas in the borough. Particularly notable being areas alongside the M25, the A406 North Circular, the A10 Great Cambridge Road and the A1055 Bullsmoor Lane.

These findings must be included in the new AQAP. The plan also must include a full set of proposals on the **measures necessary to protect new, as well as existing residential population from poor air quality once the new Local Plan is finalised.**

### **C. Other updates to be incorporated:**

A new report by [City Hall](#) published in January this year revealed that from 2016-2019 nitrogen oxide emissions in the **outer boroughs reduced at just half the rate** compared to both central and inner London boroughs.

The percentage reduction in particulate matter (PM.10) was also 10 times greater in inner and central London than in outer London and the percentage reduction of fine particulate matter (PM2.5) was five times greater in central London than in outer.

*These findings are a signal that Enfield (an outer borough) needs to significantly increase its efforts to tackle air pollution, and that more resources need to be dedicated to deal with this serious public health problem.*

***The same research also showed that those exposed to the worst air pollution are more likely to be deprived Londoners and from black, Asian and minority ethnic communities.***

However, the present draft has ***no actions specifically aimed at improving air quality in deprived communities***, especially in the east of the borough. Such actions need to become an essential part of the plan: first by acknowledging the exposure to high level of pollution in areas near the North Circular Road, Bowes Road, Fore Street, Montagu Road and other areas near the Edmonton incinerator; and secondly by setting out a clearly drawn **strategy** on how these areas could become ***more protected from air pollution.***

#### **1.2 The role of local authorities:**

- It is essential to refer to the new Environment Act 2021 and explain how this central piece of legislation affects the role of local authorities in tackling air pollution.
- It would be helpful to outline clearly which other regional and national authorities have statutory responsibility in the management of different types of roads and define clear actions on how the council intends to work with these to reduce air pollution from transport.

#### **1.3 Collaborative approach**

- More clearly defined aims and measurable objectives would be very helpful, even if these will be carried out by other departments in the council.
- Emphasise the public health department’s co-leading role and shared responsibility for air quality issues as well as the implementation of the AQAP. This should be reflected

in the council's Public Health Strategy in a concrete way and highlighted in this AQAP.

- Given the high profile recognition of air pollution as a public health emergency, a joint public health campaign on air pollution coordinated with all council departments and led by Public Health to be initiated as soon as possible.

#### **1.4 Engagement with stakeholders.**

This AQAP should also describe how the council plans to engage with all sectors of society. For example, the council could identify local businesses as well as community-led initiatives that tackle air pollution and provide them with publicity, guidance and whatever support is available. This in turn could inspire other groups and individuals to become engaged with the issues of air pollution in a constructive way.

#### **1.5 Language and terminology**

To foster positive engagement with the public in Enfield, the AQAP will benefit from providing user friendly information and explanations through and through, to ensure that the plan becomes more accessible to the public. We propose:

- Explanations on the legal limits of air pollutants on one hand and the need for tighter air quality targets in the light of the new WHO guidance on the other. In 2021 WHO recommended new, much lower limits to permitted levels of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> *in recognition that there are no safe limits for these and other air pollutants*. This should be included and explained.
- Clear explanations and definitions are also needed for 3 politically sensitive concepts: *Low Emissions Neighbourhoods*, *Healthy Streets* and *Quieter Neighbourhoods* (action 9 & 18). There seems to be a tendency to use these terms as interchangeable and thus create unnecessary confusion. If there is an overlap, this should also be explained. With regard to achieving these actions, it is necessary to have clear and concretely defined targets, including time scales. This could be very helpful especially in the light of the fact that so far the *Quieter Neighbourhood* schemes have resulted in 'negligible' change in concentrations of nitrogen dioxide, according to the council's own assessments.
- Many actions are vague and lack concrete information such as at the locations where they should occur as well as the time frame; most are designated as "ongoing", even where it would be possible to define annual targets. This entails the risk of undermining the credibility of the action or target or both.
- It is assumed that this plan is intended to inform the public and not just for bureaucratic consumption. Hence it is recommended to reduce the amount of bureaucratic terms and phrases as these will not help to engage the public.

#### **1.6 Resources:**

- It is clear to us that there is now urgent need for Enfield council to increase the resources allocated to tackling air pollution.
- Such resources could be used to recruit more employees with relevant skills to work in the Air Pollution Office.

- Use this increased capacity to join (among others) initiatives generated by the GLA, identify sources of funding for such initiatives as well as develop targets which are measurable and time sensitive.

### **1.7 Some targets for Enfield Draft AQ Action Plan, as recommended by the GLA (see Appendix A):**

- Meet the interim WHO target of 10ug/m<sup>3</sup> by 2030 for PM<sub>2.5</sub>
- Prioritise PM<sub>2.5</sub> monitoring
- Include clear measurables and targets in AQ Action Plans
- Communicate pollution alerts

The GLA made a specific recommendations for North London boroughs:

- All boroughs could consider following Waltham Forest in monitoring PM<sub>2.5</sub> to ensure the objective is achieved and to assess the effectiveness of their PM-targeted action plan measures [WF introduced a new automatic PM<sub>2.5</sub> monitoring site in 2020].

There is no evidence that these recommendations have been addressed in this draft AQAP which does not, for example, include any plan to instal a PM<sub>2.5</sub> automatic monitoring site.

## **Part 2: Areas of Action**

The Draft Plan identified 5 areas for developing actions:

- 1. Reducing emissions from transport**
- 2. Reducing emissions from buildings and developments**
- 3. Raising awareness so that the public acts to lower emissions and to reduce exposure to air pollution**
- 4. Lobbying and partnership working**
- 5. Monitoring air quality to assess compliance with Government objectives as well as support and evaluate local policies and projects.**

**In addition, the Draft Plan singled out the following priorities:**

- Accelerate shift to active modes of transport – walking and cycling, and away from private vehicle use, through school streets and low traffic neighbourhoods/healthy streets; alongside switching to electric vehicles, accessible public transport, improved EV infrastructure.
- Use the planning system to reduce emissions from new developments and buildings; programme of improvement of council buildings
- Continue collaboration with public health, transport, planning and climate change departments so that “air quality is considered within these other policy areas”.
- Engage with stakeholders and communities.

**The proposals that follow refer to the above framework and priorities:**

### **2.1 Reducing air pollution in areas of social deprivation and poverty should be included in the list of the Plan’s priorities.**

- Specific actions, targets and measures are urgently needed to protect the communities affected and which are known to include high percentages of people from black, brown or other racial or ethnic groups.

## 2.2 Air Quality Monitoring

It is clear that this area requires urgent improvements:

- Recognise (in actions and not just in words) that data gathering through monitoring is essential to any effective plan of action.
- Significantly expand the monitoring of NO<sub>2</sub> and particulate matter thus sending a clear message that Enfield takes the issue of air pollution as central in its overall strategy.
- Expand monitoring especially around schools, nurseries, playgrounds and care homes. Immediately start monitoring in the playgrounds of all schools situated near air pollution hot spots. Use the results as educational tools as well as to inform future action.
- As a matter of urgency, substantially increase the number of NO<sub>2</sub> diffusion tubes in areas other than schools, in order to obtain detailed, accurate and real (rather than modelled) information on the air pollutions situation in the borough and especially along roads with heavy traffic, such as A406, A10, Green Lanes, Church Street (Enfield Town), Southbury Road, Fore Street and other heavily congested roads.
- Introduce at least two more PM<sub>10</sub> monitors and at least one PM<sub>2.5</sub> monitor as part of the automatic monitoring system as well as adding two more NO<sub>2</sub> reference sites to the automatic monitoring system.
- Consider also installing lower cost monitors for NO<sub>2</sub> and PM<sub>2.5</sub>. This should be less of a financial burden than in the past, as sophisticated and relatively low cost devices have become available. Such monitors are connected to a live feed, which can be used to inform the public on the air quality situation locally, according to post code. Such monitors are available at a relatively low annual cost through the Breathe London project, supported by the Mayor of London.
- As the table below indicates, Enfield has a very limited number of monitoring sites, lagging behind many other London boroughs, and resulting in limited information available.

### Enfield Council AQ Monitoring Comparison

Borough	Size	NO <sub>2</sub> non-automatic monitoring sites	NO <sub>2</sub> Automatic monitoring sites	PM <sub>10</sub> Automatic monitoring sites	PM <sub>2.5</sub> Automatic monitoring sites
Enfield (2022)	82.21 km <sup>2</sup>	21*	4	1	0
Waltham Forest (2020)	38.82 km <sup>2</sup>	59	3	3	1
Lewisham (2020)	35.15 km <sup>2</sup>	96	5	3	3

*\*including 11 NO<sub>2</sub> diffusion tubes added in 2021 for traffic schemes*

- Monitoring locations should be representative of public exposure, *so that no distance adjustment is required when presenting the data* (as implemented in Haringey).
- Where schemes are introduced that may affect air quality, *robust baseline data* should be collected in advance of implementation.

- Surrounding roads should be monitored using NO2 diffusion tubes where traffic has increased or is likely to increase due to a traffic scheme.
- Commitment to keep such monitoring sites in place for at least 3 years or until such time as the AQ shows consistent improvement
- Publicly available data on AQ monitoring should be available on the council's website, including information from the previous 5 years.
- Increased monitoring around the Edmonton incinerator & nearby housing developments:
- Commit to PM2.5, PM10 and NO2 monitoring in dense housing developments near the Edmonton incinerator.
- Investigate health issues in areas near the incinerator, including existing or proposed high rise blocks of flats with the help of academic institutions which could undertake an independent study of health effects using reliable biomonitoring research methods.

## 2.4 Transport

We identified **Public Transport** as an area of high priority to achieve the aim of reducing the usage of private cars. Thus, working with TfL and the Mayor of London to achieve the following improvements should become also a high priority. We identified the following targets:

- Trains – improved frequency (as this has declined in the aftermath of the pandemic). If people have to wait a long time for trains they may choose to drive instead. Reduced train services have serious impacts on those who rely on these services and does not help the transition away from private car use. Enfield Council should work with TfL and train service providers to ensure that train services are improved.
- Buses – increase the frequency of buses in areas where congestion has caused delays and, where possible, prioritise segregated bus lanes particularly at peak times. These measures are necessary in outer London in order for public transport to become a viable alternative to car use.
- Buses – increase the number of bus routes in areas identified as poorly served by public transport.
- Prioritise rolling out clean buses on the busiest roads, e.g., Fore Street, Green Lanes, North Circular etc.

### **Private car use:**

- Consider council tax reduction or a bonus or other financial incentives for households choosing to give up existing cars.
- Initiate or contribute to a campaign with London Mayor to make large SUVs an unfashionable choice in Enfield
- Work hard to introduce a lot more car clubs in the borough (Waltham Forest has 72 car club bays)
- Continue with sustained public campaign to discourage car idling, with specific yearly targets.

- Work with London Mayor on the consultation to implement expansion of the ULEZ to outer London and lobby for a financial scheme to support those least well off to transition to cleaner vehicles.
- Devise a strategy to roll out a 20 MILE PER HOUR LIMIT across the borough.
- EV infrastructure: The aim of 250 charging points by 2025 and 4 rapid charging points by 2030 should be set out in year-by-year targets and should be monitored. All charging points should be dedicated for EV charging only as otherwise they will be used as parking spaces. Publish usage data for the EV chargers to assess effectiveness. Enfield is much behind other North London boroughs, such as Waltham Forest, with regards to developing this infrastructure and should consider increasing the target number of charging facilities to be implemented over the course of the plan.

### **Roadworks:**

- Consolidate roadworks and make them more efficient to reduce the traffic congestion they cause.
- Fine companies who do not complete work on time.
- Consider the effect on air quality when issuing work permits.

### **Walking and cycling:**

- Publish an updated list of improvements required for walking and cycling infrastructure across the borough and an action plan to implement them. Ensure that walking paths *accessibility embraces the rights of those with disabilities and are wheelchair and pram friendly.*
- Increase safe pedestrian crossings on busy roads, e.g., Fore Street and Bourne Hill, and introduce pedestrian crossing lights at all major junctions. Ensure pavements are regularly inspected and safe for pedestrians, prioritising improvements on those roads with highest usage.
- Provide a network of cycle hire facilities
- Set specific targets for increases in cycling, cycling to work and cycling to school and measure them.
- Increase level of publicity of safe walking and cycling routes through sustained information in the council's website and newsletters

### **Main road residents, employees and users:**

- Address the air quality issues of people living on main roads since these residents, both adults and children, are at most risk of health conditions caused by pollution. Devise a strategy to address the high levels of pollution on main roads first before introducing any traffic scheme that would adversely affect residents and those who walk and cycle on these main roads, which are the most direct routes to get to school, work, shops and to access public transport.
- Find out at-risk groups and have a strategy to protect vulnerable workers who spend a lot of time on the road e.g. bus drivers/delivery drivers, or work in businesses on streets with heavy traffic.
- Offer green screens for homes, offices, shops and cafes facing main roads.

### **Schools, nurseries and care homes:**

- Continue to implement a borough wide School Streets programme. Parents' focus groups could be useful to develop awareness and gain support in the community where school streets have less support. Use the results of extended monitoring described above to raise awareness and change behaviours such as idling, and strengthen support for school streets.
- Produce a detailed strategy for mitigation for schools on main roads unable to join school streets programme (e.g., money for air filters/green screens). Green screens for schools near main/busy roads should be placed on the list of highest priorities in the Action Plan.
- In high areas of pollution offer monitoring and mitigation advice for care homes and nurseries.

### **Greening:**

- Tree Planting – consider putting measurable targets in the plan. Enfield Blue & Green Strategy says 500 street trees will be planted in 2022, but it is not clear how many are replacements and how many are new.
- A sustained effort to plant more trees and shrubs in the streets, both residential and commercial, especially in the eastern and southern parts of the borough which have a significant deficiency of greenery and green spaces. There should be clear targets specifying locations and time scales.
- Commitment to replace trees felled in any accounting so that the net increase in tree planting is clear.
- Greening around schools, nurseries and care homes on busy roads should be given high priority and should be included in the Blue and Green Strategy.

## **2.5 Buildings and Developments**

- In the light of the fact that 50% of PM10 emissions in Enfield are produced in the Construction Sector, there needs to be an increased effort to ensure that all developments are subject to robust monitoring and enforcement.
- Require that developers join the Considerate Constructors Scheme, to promote practices that reduce emissions from construction and demolition.
- The Annual Status Reports should give a **yearly account of progress** in retrofitting and other improvements in buildings owned by the council, including council owned housing.
- Produce a “How to” guide on insulation and heat pumps on the Council’s website for homeowners which could include average costs and endorse trusted providers in Enfield.
- Create a dedicated page on the council’s website with reliable information to encourage access to improvements on insulation, boiler switches and heat pumps, etc. for those who can afford them.
- Promote any grant schemes that support residents in transitioning to energy saving, less polluting homes.

## 2.6 Domestic wood burning:

- Enforce Enfield's Smoke Control Area Orders. Enforcement action needs to be pursued and resources should be allocated for this purpose. Make it easy for residents to report issues to the Council. Consider changing the focus of public messages on wood burning stoves, making wood burners an unfashionable choice and placing more emphasis on phasing them out and promoting less polluting, alternative heat sources.
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## Appendix A:

Extract from [GLA LOCAL AUTHORITIES AND AIR QUALITY A summary of action taken by London boroughs to improve air quality in 2020 Published January 2022:](#)

### Key Recommendations (page 10)

Priorities for the coming year should include:

- Meeting the interim WHO health-based target of 10ug/m<sup>3</sup> by 2030 target for PM<sub>2.5</sub>. with an increased focus on non-transport emissions. All boroughs are encouraged to commit to and work towards this target alongside the Mayor. Please note that the GLA will also undertake research on how and when we will be able to meet the latest WHO targets for PM<sub>2.5</sub> and NO<sub>2</sub>, which is likely to be published in summer/autumn 2022.
- Ensuring that the case for tackling air pollution is well understood within the council and with residents, to help secure existing resource and monitoring networks.
- When opportunities for providing additional monitoring arise, these should prioritise PM<sub>2.5</sub> where possible.
- Working in partnership with the GLA and other boroughs and organisations to help maximise limited resources.
- Ensuring Air Quality Action Plans are up to date and include clear measurables and targets so success can be effectively assessed each year.
- Utilising local public health and communications channels to make residents aware of how to receive pollution alerts, and methods to limit their exposure. This will help to fulfil one of the key recommendations from the Coroner in his Prevention of Future Deaths report after the inquest into the death of Ella Adoo-Kissi-Debrah.