



LONDON BOROUGH OF ENFIELD

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# ENFIELD LOCAL PLAN: 2019 - 2039

Draft Regulation 18 Plan: Air Quality Appraisal,  
Volume 1 (Report)





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Draft Regulation 18 Plan: Air Quality Appraisal, Volume 1  
(Report)

**TYPE OF DOCUMENT (VERSION) PUBLIC**

**PROJECT NO. 70084605**

**OUR REF. NO. AQ1/VOL1**

**DATE: JUNE 2021**

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# EXECUTIVE SUMMARY

A high-level Air Quality Appraisal has been undertaken for the emerging Enfield Local Plan 2019-2039. Proportionate to the Regulation 18 stage of the Local Plan process, the appraisal provides a preliminary air quality evidence base, which will be built upon during the modelling to be undertaken at Regulation 19 stage.

The findings are as follows:

- **Baseline air quality conditions:** Air quality in Enfield is affected by regional and local emissions sources. In 2001, the whole borough was declared an Air Quality Management Area due to annual mean nitrogen dioxide and daily mean particulate concentrations not meeting air quality objectives. The main source of air pollution is road transport. Monitoring undertaken by the Council suggests that pollutant concentrations within the borough should now meet the objectives in most locations, although the monitoring coverage is limited. Modelling undertaken by the Greater London Authority for 2016 right across London highlights likely pollution hotspots within the borough. Particularly notable are areas alongside the M25, the A406 North Circular, the A10 Great Cambridge Road and the A1055 Bullsmoor Lane. These hotspots have been identified by the Greater London Authority as Air Quality Focus Areas.
- **Exposure to air pollution at site allocations:** Proposed site allocations within Enfield were assessed for potential exposure of future occupants to poor air quality. The level of exposure to nitrogen dioxide was determined using the Greater London Authority's modelled data for 2016 and the London Councils' Air Pollution Exposure Criteria to indicate if the occupants of new residential premises would experience relatively good, moderately good or poor air quality. It was found that:
  - an estimated 5,236 residential units across 21 site allocations are likely to be exposed to good air quality
  - an estimated 3,384 residential units across 9 site allocations are likely to be exposed to moderately good air quality
  - an estimated 14,806 residential units across 18 site allocations would potentially be exposed to relatively poor air quality.

Site allocations with moderately good air quality must consider, and potentially poor air quality would require, measures to protect new residential population from poor air quality.

- **Potential air quality impact in the local area:** An assessment was made using criteria based on site allocation size and proximity to the nearest Air Quality Focus Area. This was to undertake a high-level screening of site allocations which may give rise to negligible, minor negative or significant negative air quality effect. It was found that:
  - 4 site allocations are likely to have negligible effect
  - 23 site allocations are likely to have minor negative effect
  - 38 site allocations potentially have significant negative effect

Detailed quantitative air quality modelling to be undertaken at the Regulation 19 stage will provide further information on air quality impacts at site allocations.

- **Risk of adverse impacts at designated ecological sites:** Four ecological sites within 10km of Enfield were identified (one internationally designated and three European designated), and one nationally designated ecological site within Enfield was identified. These were assessed for risk of adverse air quality impacts. It was found that:
  - Chingford Reservoirs Site of Special Scientific Interest (entirely within the borough) and Lee Valley Ramsar / Special Protection Area (north of the borough) are likely to be at low risk of adverse air quality impacts
  - Lee Valley Ramsar / Special Protection Area (south of the borough) and Wormley-Hoddesdon Park Woods Special Area of Conservation (north of the borough) are likely to be at moderate risk of adverse air quality impacts
  - Epping Forest Special Area of Conservation (east of the borough) is likely to be at high risk of adverse air quality impacts

For those sites determined to be at moderate or high risk of adverse air quality impacts, it was concluded that road traffic emissions should be the mitigation focus. The impacts of road emissions will be quantified during the detailed quantitative air quality modelling to be undertaken at the Regulation 19 stage.

# 1 INTRODUCTION

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- 1.1.1. This air quality appraisal report has been prepared to inform the Regulation 18 stage of the Draft Enfield Local Plan for 2019-2039 (hereafter referred to as ‘the Local Plan’), in-particular the Integrated Impact Assessment (IIA) and Habitats Regulations Assessment (HRA).
- 1.1.2. The report provides:
- Legislation and policy context;
  - A high-level overview of baseline air quality conditions within the area that could be affected;
  - Qualitative appraisal of site allocations in-terms of exposure to air pollutants within each site;
  - Qualitative appraisal of potential air quality impact within 1km of each site;
  - Consideration of the risks from air quality impacts at designated ecological sites; and
  - Consideration of the need for mitigation.
- 1.1.3. This report is not intended to provide a definitive air quality assessment of site allocations or strategic growth options. A detailed quantitative air quality assessment of the Local Plan will be undertaken at the Regulation 19 stage.
- 1.1.4. Figures and Appendices are included in Volume 2 and Volume 3, respectively.
- 1.1.5. The site allocations that have been considered at the Regulation 18 stage are shown in Figure 1 (Volume 2).

## 2 GLOSSARY OF TERMS

2.1.1. Table 2-1 provides explanations of terms and abbreviations that are used in the following sections of this report.

**Table 2-1 - Glossary**

<b>Term / Abbreviation</b>	<b>Definition</b>
Ambient air	The external atmosphere.
Ammonia (NH <sub>3</sub> )	NH <sub>3</sub> is a highly reactive alkaline gas from natural and human sources (mostly agriculture but also from vehicle and combustion plant exhaust points that use catalytic convertors to remove nitrogen oxides). In the environment it can adversely affect sensitive ecosystems. It can be directly harmful but is also an important component of nitrogen deposition.
Air Quality Action Plan (AQAP)	The mechanism under the Local Air Quality Management regime by which local authorities set out measures to bring about improvement in local air quality in locations where one or more air quality objective is likely to be exceeded and an Air Quality Management Area has been declared.
Air Quality Focus Area (AQFA)	An AQFA is an allocation that has been identified by the Greater London Authority (GLA) where there is exceedance of the annual mean limit value for nitrogen dioxide and high human exposure (such as multiple residential premises).
Air Quality Management Area (AQMA)	One or more designated area under the Local Air Quality Management (LAQM) regime where a local authority determines that one or more air quality objective is not likely to be achieved. An AQMA can be declared over a whole borough or focused on a particular area within a borough.
Air quality objective	An objective is the target date on which exceedances of an Air Quality Standard must not exceed a specified value. Air quality objectives apply in locations where there is relevant exposure.
Air quality standard	An air quality standard is the concentration recorded over a given time period, which is considered to be acceptable in terms of what is scientifically known about the effects of a pollutant on health and on the environment. They can also be used as a benchmark to indicate whether air pollution is getting better or worse.
Critical level	In the context of this report, a critical level is the concentration above which direct adverse effects on receptors, such as plants or ecosystems, may occur according to present knowledge.
Critical load	In the context of this report, a critical load is a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment are not likely to occur according to present knowledge.
Designated ecological site	This term refers to sites that have been designated as special status as protected areas because of their natural importance. These clearly defined areas have protection to ensure that the nature and wildlife are not harmed or destroyed.



<b>Term / Abbreviation</b>	<b>Definition</b>
Defra	Department for Environment, Food and Rural Affairs.
Exceedance	An exceedance is a period of time (defined for each Air Quality Standard) where the concentration is higher than that set out in the standard. To make useful comparisons between pollutants, (air quality standards may be expressed in terms of different averaging times), the number of days on which an exceedance has been recorded is often reported.
Hectare (ha)	A unit of area equal to 10,000m <sup>2</sup> .
Hotspot	A location where air pollutant concentrations are likely to be above (and therefore not meet) the Air Quality Standard.
HRA	Habitats Regulations Assessment.
IIA	Integrated Impact Assessment.
Kilograms of Nitrogen per hectare per year (kgN/ha/year)	Units of measurement describing the rate at which nitrogen is deposited in relation to a designated ecological site.
Kilometre (km)	A unit of length equal to 1,000m.
Square kilometre (km <sup>2</sup> )	A unit of area equal to 1,000,000m <sup>2</sup> .
Limit value	A limit value is a legally binding air quality standard that must not be exceeded. Limit values are set for individual pollutants and are made up of a concentration value, an averaging time over which it is to be measured, the number of exceedances allowed per year, if any, and a date by which it must be achieved. Some pollutants have more than one limit value covering different endpoints or averaging times.
Local Air Quality Management (LAQM)	A regime set up under the Part IV of the Environment Act 1995 whereby local authorities are responsible for the regular review and assessment air quality within their administrative areas, reporting their findings to Defra and in the public domain, and in taking action to maintain and improve air quality where air quality objectives are likely to be exceeded.
Metre (m)	A unit of length (the base unit of length in the International System of Units).
Square metre (m <sup>2</sup> )	A unit of area.
Micrograms per cubic meter (µg/m <sup>3</sup> )	Units of measurement used to describe the quantity of a pollutant in the air – i.e. the concentration. A microgram is one-millionth of a gram.
Nitrogen deposition	In the context of this report, nitrogen deposition refers to the input of nitrogen from the atmosphere to the ground which is taken up by vegetation. Emissions of nitrogen oxides and ammonia are important in determining the nitrogen deposition rate.

Term / Abbreviation	Definition
Nitrogen dioxide (NO <sub>2</sub> )	A gaseous pollutant that is harmful to health. It is generated as a consequence of combustion processes, where high temperatures are generated causing the naturally occurring nitrogen in the air to oxidise to form nitrogen oxides. NO <sub>2</sub> inflames the lung lining and reduces immunity to infection, with the effect being more pronounced in those with respiratory disease (such as asthma).
Nitrogen oxides (NO <sub>x</sub> )	A group of gases, that includes nitrogen oxide and nitrogen dioxide.
PM <sub>2.5</sub>	Very small airborne particles less than 2.5 micrometres in diameter that can pass into the airways, lungs and bloodstream. Associated with respiratory and cardio-vascular diseases and can carry other toxic substances into the body.
PM <sub>10</sub>	Small airborne particles less than 10 micrometres in diameter that can pass into the airways and lungs. Associated with respiratory and cardio-vascular diseases and can carry other toxic substances into the body.
Site of Special Scientific Interest (SSSI)	In the context of the Local Plan, a SSSI is a nationally designated area of special interest due to their fauna, flora, geological or physiographical features. In relation to air quality any geological or physiographical features are not considered to be sensitive.
Special Area of Conservation (SAC)	In the context of the Local Plan, a SAC is a protected area designated under the Conservation of Habitats and Species Regulations 2017 (as amended). A SAC is an important high-quality conservation site with a significant contribution to conserving the habitats and species identified in Annexes I and II, respectively, of European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora - commonly referred to as 'the Habitats Directive'.
Special Protection Area (SPA)	In the context of the Local Plan, a SPA is a protected area for birds under the Wildlife & Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended).
Ramsar	This is an ecological designation given to wetlands of international importance that have been designated under the criteria of the intergovernmental Ramsar Convention on Wetlands for containing representative, rare or unique wetland types or for their importance in conserving biological diversity.
Relevant exposure	Used in the context of public exposure to air pollution in one or more location situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present.
WHO	World Health Organisation.

### 3 LEGISLATION AND POLICY CONTEXT

3.1.1. Table 3-1 outlines relevant legislation. Relevant policy is outlined in Table 3-2.

**Table 3-1 - Relevant air quality legislation**

Legislation document	Overview
The Environment Act 1995	Under Part IV local authorities have responsibility for Local Air Quality Management (LAQM) and must review and document local air quality within their area by way of staged appraisals and respond accordingly, with the aim of meeting the air quality objectives defined in Regulations. Where the objectives are not likely to be achieved, an authority is required to designate an Air Quality Management Area (AQMA). For each AQMA the local authority is required to draw up an Air Quality Action Plan to secure improvements in air quality and show how it intends to work towards achieving air quality standards in the future.
The Air Quality (England) Regulations 2000 (as amended)	Sets air quality standards as objectives for ambient pollutant concentrations. These apply where there is relevant exposure: <i>“at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present.”</i>
The Air Quality Standards Regulations 2010 (as amended)	Sets legally binding limit values for concentrations in outdoor air of major air pollutants that impact public health such as PM <sub>10</sub> , PM <sub>2.5</sub> and NO <sub>2</sub> . The limit values are numerically the same as for the objectives set under The Air Quality (England) Regulations 2000 (as amended).

**Table 3-2 - Relevant policy**

Policy document	Overview
National Planning Policy Framework	Sets out and describes the overall planning policies for England. The core underpinning principle of the Framework is the presumption in favour of sustainable development. There are several objectives within the NPPF aimed specifically at air quality improvements, encouraging exposure reduction and reducing emissions.
Air Quality Strategy for England, Scotland, Wales and Northern Ireland	The Air Quality Strategy provides a framework for reducing air pollution in the UK with the aim of meeting the requirements of European Union Legislation (to be revised in due course following the UK leaving the EU). The Strategy sets out standards and objectives for key air pollutants to protect health, vegetation and ecosystems.
Clean Air Strategy 2019	This sets out the measures, which aim to reduce emissions from all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy. The Strategy also provides goals to cut public exposure to airborne particulate matter, as per the recommendation made by the World Health Organisation (WHO).
The London Environment Strategy	One of the key aims of the strategy is: <i>“London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities.”</i> Chapter 4 addresses air quality and sets out objectives, policy items and proposals to (amongst other things): reduce exposure to harmful pollution; tackle health inequality; achieve compliance with limit values as

Policy document	Overview
	<p>soon as possible; reduce emissions from transport and phase out use of fossil fuels; reduce freight movements through better use of consolidated trips; prevent or reduce emissions from NRMM; reduce emissions from construction and demolition sites; and meet the WHO guideline limit for PM<sub>2.5</sub> by 2030.</p>
<p>The London Plan 2021: The Spatial Development Strategy for Greater London</p>	<p>Policy SI 1 of the London Plan is the key policy specific to the improvement of air quality within Greater London. In particular:</p> <p><i>“1) Development proposals should not:</i></p> <ul style="list-style-type: none"> <li><i>a) lead to further deterioration of existing poor air quality</i></li> <li><i>b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits</i></li> <li><i>c) create unacceptable risk of high levels of exposure to poor air quality”</i> <p>The policy also sets out that all new development <i>“must be at least Air Quality Neutral”</i> and larger developments that are subject to EIA <i>“should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach”</i> stating that <i>“a statement should be submitted”</i> to demonstrate this.</p> </li></ul>
<p>Enfield Air Quality Action Plan</p>	<p>Sets out the air quality context in the London Borough of Enfield (LBE) following review and assessment. It contains a set of relevant actions which have been developed and put in place by Enfield Council to achieve improvements in air quality within the borough. Air Quality Action Plans are implemented by local authorities within which AQMAs have been declared and are a requirement of Local Air Quality Management responsibilities under Part IV of the Environment Act 1995. The Enfield Air Quality Action Plan is in the process of being updated.</p>
<p>Enfield Climate Change Action Plan</p>	<p>Sets out Enfield Council's vision and pledge for climate action along with the context of climate change related emissions from various sources. A roadmap for the borough to achieve carbon neutral status is set out within the document. Also presented are a series of actions under several main sectors (The Council's Operations, Travel, Buildings, Waste, Energy and Natural Environment) and current progress against them.</p>

## 4 BASELINE CONDITIONS

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### 4.1 REGIONAL CONTEXT

- 4.1.1. It is well known that air quality in Greater London is generally poor, with all London boroughs having declared one or more AQMA. Data published by the Department for Environment, Food and Rural Affairs (Defra)<sup>1</sup> show that in Greater London there are:
- Four AQMAs declared due to exceedances of the 1-hour mean nitrogen dioxide (NO<sub>2</sub>) objective (200µg/m<sup>3</sup> not be exceeded more than 18 times a year), annual mean NO<sub>2</sub> objective (40µg/m<sup>3</sup>), 24-hour mean PM<sub>10</sub> objective (50µg/m<sup>3</sup> not be exceeded more than 35 times a year), and annual mean PM<sub>10</sub> objective (40µg/m<sup>3</sup>);
  - Four AQMAs declared due to exceedances of the 1-hour mean NO<sub>2</sub> objective, annual mean NO<sub>2</sub> objective, and 24-hour mean PM<sub>10</sub> objective;
  - Three AQMAs declared due to exceedances of the annual mean NO<sub>2</sub> objective, 24-hour mean PM<sub>10</sub> objective, and annual mean PM<sub>10</sub> objective;
  - Eighteen AQMAs declared due to exceedances of the annual mean NO<sub>2</sub> objective, and 24-hour mean PM<sub>10</sub> objective; and
  - Five AQMAs declared due to exceedances of the annual mean NO<sub>2</sub> objective only.
- 4.1.2. Outside of London, local authorities (except Welwyn and Hatfield) adjacent to LBE have also declared AQMAs; however, these are for relatively small, localised areas comprising stretches of motorway/main roads and urban centres.
- 4.1.3. By far the most important emissions source and cause of the high pollutant levels associated with these AQMAs has been, and continues to be, road transport.
- 4.1.4. Looking to the future, road transport emissions of oxides of nitrogen (NO<sub>x</sub>) will decline as the proportions of zero and low emission vehicles increases – stimulated by recent and forthcoming legislation and policy changes. Similarly, NO<sub>x</sub> emissions from other sources, such as building heating systems, will also decline with the uptake of zero emissions technologies such as heat pumps. Particulate pollution is also expected to reduce although challenges for new development will remain with the adoption of the WHO guideline limit for PM<sub>2.5</sub> of 10µg/m<sup>3</sup> in the London Environment Strategy.
- 4.1.5. The reductions in NO<sub>x</sub> emissions should also ease the pressure on designated ecological sites where nitrogen and acid deposition rates currently exceed critical loads for sensitive ecological features. However, agricultural activities in surrounding rural areas, will remain a substantial contributor to background ammonia (NH<sub>3</sub>), which is an important contributor to nitrogen deposition and harmful in its own right where critical levels for the protection of vegetation are exceeded. According to research published by the Joint Nature Conservation Committee, unlike for other air

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<sup>1</sup> Department for Environment, Food and Rural Affairs, 2021 AQMA Dataset. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [accessed June 2021]

pollutants, emissions of ammonia are forecast to increase with the intensification of agriculture under the 'business as usual' scenario, without concerted action<sup>2</sup>.

## 4.2 LOCAL CONTEXT

- 4.2.1. In undertaking its LAQM duties, in 2001, LBE declared the entire borough an AQMA due to exceedances of the air quality objectives for annual mean NO<sub>2</sub> and 24-hour mean PM<sub>10</sub> concentrations.
- 4.2.2. In addition to the AQMA, six AQFAs within Enfield have been identified by the Greater London Authority (GLA)<sup>3</sup>. These include:
- A406 North Circular and A1010 Fore Street;
  - A10 Great Cambridge Road/A110 Southbury Road;
  - Church Street/Southbury Road/London Road;
  - Southgate Circus A111/A1004;
  - A1055 Bullsmoor Lane; and
  - A406 North Circular between Bowes Road and A10 Great Cambridge Road.
- 4.2.3. These AQFAs are shown, together with those in adjacent London boroughs, in Figure 2 (Volume 2). According to the GLA, *"The Focus Areas are locations that not only exceed the EU annual mean limit value for NO<sub>2</sub> but are also locations with high human exposure. They were defined to address concerns raised by boroughs within the LAQM review process and forecasted air pollution trends."*
- 4.2.4. As with most local authorities, air quality within Enfield has been - and still is - substantially influenced by emissions from road transport. According to the GLA's latest London Atmospheric Emissions Inventory (LAEI) for 2016, approximately 43% of NO<sub>x</sub>, 30% of PM<sub>10</sub> and 36% of PM<sub>2.5</sub> emissions originated from road transport within the borough<sup>4</sup>. The second most important source of NO<sub>x</sub> was industry, which accounted for 39% of all NO<sub>x</sub> emissions in 2016. For PM<sub>10</sub>, the second most important source was construction, making up 29% of the total. For PM<sub>2.5</sub>, the second most important source in 2016 was domestic wood burning, comprising 17% of the total.
- 4.2.5. As of 2019, LBE has monitored local air quality at 14 locations, including: 4 continuous monitoring stations (CMS), and 10 locations with passive diffusion tubes. The CMS provide accurate measurements of pollutant concentrations on an hourly basis, and are used by LBE to monitor NO<sub>2</sub> and PM<sub>10</sub> concentrations. Passive diffusion tubes are used by LBE to monitor annual mean NO<sub>2</sub> concentrations only. LBE monitoring locations are shown in Figure 3 (Volume 2). Details for 2019 (the latest year prior to the COVID-19 pandemic) are given in Table 4-1 and Table 4-2.

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<sup>2</sup> Joint Nature Conservation Committee, Nitrogen Futures. Available at: <https://jncc.gov.uk/our-work/nitrogen-futures/> [accessed May 2021]

<sup>3</sup> Greater London Authority, London Atmospheric Emissions Inventory (LAEI) 2016 Air Quality Focus. Available at: <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016-air-quality-focus-areas> [accessed May 2021]

<sup>4</sup> Greater London Authority, LAEI 2016 – Borough Air Quality Data for LLAQM. Available at: <https://data.london.gov.uk/dataset/laei-2016---borough-air-quality-data-for-llaqm> [accessed June 2021]

**Table 4-1 - LBE continuous monitoring information for 2019**

ID	Location	X,Y (m)	Type	Pollutants monitored	NO <sub>2</sub> (see Notes)	PM <sub>10</sub> (see Notes)
ENF1	Bush Hill Park	533881, 195832	Urban Background	NO <sub>2</sub>	22µg/m <sup>3</sup> (0)	Not measured
ENF4	Derby Road	535056, 192470	Roadside	NO <sub>2</sub>	37µg/m <sup>3</sup> (0)	Not measured
ENF5	Bowes Road	529893, 192224	Roadside	NO <sub>2</sub> , PM <sub>10</sub>	39µg/m <sup>3</sup> (0)	19µg/m <sup>3</sup> (9)
ENF7	Prince of Wales School	536886, 198497	Urban Background	NO <sub>2</sub>	23µg/m <sup>3</sup> (0)	Not measured

Notes:

For NO<sub>2</sub>, the annual mean concentration and number of hours (in brackets) above the 1-hour mean standard threshold of 200µg/m<sup>3</sup> (where no more than 18 hours above is allowed) is given

For PM<sub>10</sub>, the annual mean concentration and number of days (in brackets) above the 24-hour mean standard threshold of 50µg/m<sup>3</sup> (where no more than 35 days above is allowed) is given

**Table 4-2 - LBE passive monitoring information for 2019**

ID	Location	X,Y (m)	Type	Annual Mean NO <sub>2</sub> concentration (µg/m <sup>3</sup> )
Enfield 1	Church Street	532668, 196555	Kerbside	44.7
Enfield 2	Winchmore Hill	529753, 194332	Kerbside	37.1
Enfield 3	Old Park Ridings	531981, 195305	Roadside	23.1
Enfield 4	Aldermans Hill	530966, 192714	Roadside	30.1
Enfield 5	Southbury Road	534238, 196314	Roadside	39.5
Enfield 6	Courtleigh Avenue	526449, 198404	Urban background	14.0
Enfield 7	Bullsmoor Lane	535460, 199849	Roadside	20.6



ID	Location	X,Y (m)	Type	Annual Mean NO <sub>2</sub> concentration (µg/m <sup>3</sup> )
Enfield 8	Fore Street	534195, 192806	Kerbside	38.5
Enfield 9	Warwick Road	529945, 192118	Urban Background	24.3
Enfield 10	Alexandra Park (Haringey)	530150, 190007	Urban Background	36.6

Notes:

Concentration in **bold** indicates exceedance of the annual mean NO<sub>2</sub> air quality objective (40µg/m<sup>3</sup>).

Where the annual mean concentration does not exceed 60µg/m<sup>3</sup>, it is likely that the 1-hour mean NO<sub>2</sub> air quality objective (200 µg/m<sup>3</sup> not to be exceeded more than 18 times a year) will be met<sup>5</sup>.

- 4.2.6. Although the LBE monitoring data suggests that pollutant concentrations within the borough should mostly meet the objectives, the coverage of monitoring sites is limited. For an overall view of baseline pollutant concentrations across the borough, the LAEI for 2016 provides modelled concentrations at a relatively high resolution with predictions at 20m intervals (extending right across London).
- 4.2.7. LAEI modelled annual mean NO<sub>2</sub> concentrations across LBE highlight likely pollution hotspots. These hotspot areas, are highlighted in Figure 2 (Volume 2) where concentrations exceed the objective of 40µg/m<sup>3</sup>. Particularly notable are areas alongside the M25, the A406 North Circular, the A10 Great Cambridge Road and the A1055 Bullsmoor Lane.

### 4.3 SENSITIVE RECEPTORS

- 4.3.1. Potentially sensitive receptors include:
- locations where members of the public are likely to be present, including residential premises, schools and hospitals (amongst others); and
  - designated ecological sites of national and international importance (as considered at Regulation 18 stage) with features that are sensitive to changes in ambient concentrations of NO<sub>x</sub> and ammonia, and nitrogen and acid deposition rates.
- 4.3.2. The borough includes areas with high residential population where high levels of NO<sub>2</sub> also occur. These have been identified as AQFAs, as shown in Figure 2 (Volume 2).
- 4.3.3. Table 4-3 identifies potentially sensitive internationally designated ecological sites within a potential 10km zone of influence from the borough boundary. For Regulation 18, nationally designated

<sup>5</sup> Mayor of London, London Local Air Quality Management (LLAQM) Technical Guidance 2019 (LLAQM.TG(19)). Available at: <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs> [accessed June 2021]



ecological sites within the borough boundary only have been identified. These designated ecological sites are shown in Figure 4 (Volume 2).

**Table 4-3 - Ecological receptors**

Ecological Site	Designation
Chingford Reservoir (within LBE)	Site of Special Scientific Interest (SSSI)
Lee Valley (south of LBE)	Ramsar and Special Protection Area (SPA)
Lee Valley (north of LBE)	Ramsar and SPA
Wormley-Hoddesdonpark Woods (north of LBE)	Special Area of Conservation (SAC)
Epping Forest (east of LBE)	SAC

## 5 APPRAISAL METHODOLOGY

### 5.1 OVERVIEW

5.1.1. At Regulation 18 stage, no modelling has been undertaken to predict pollutant concentrations. The appraisal undertaken is qualitative and high level – making use of the available baseline information. The methodology addresses:

- Potential level of exposure to air pollution at site allocations with a housing component – either exclusively identified for housing or as mixed use. Exposure has not been considered at sites with no intended residential occupation;
- The potential air quality impact in the local area. This has been undertaken to feed into the separate Integrated Impact Assessment under objective 11: ‘Minimise Air Pollution’. The appraisal also considers the potential impacts in relation to social deprivation; and
- The risk of adverse impacts at designated ecological sites.

### 5.2 EXPOSURE TO AIR POLLUTION AT SITE ALLOCATIONS

5.2.1. To determine the potential level of exposure to air pollution, the London Councils’ Air Pollution Exposure Criteria (APEC)<sup>6</sup> have been applied to annual mean NO<sub>2</sub> concentration data (Table 5-1) taken from the GLA LAEI model<sup>7</sup> for the year 2016. The LAEI model provides pollutant concentration data at a 20m by 20m grid resolution across all London boroughs and areas within the M25 motorway. NO<sub>2</sub> has been chosen over other pollutants as it is the most likely of all pollutants to exceed current legislated standards. The LAEI grid points falling within the boundary of each of the sites has been used.

5.2.2. Where a site has been determined to have concentrations meeting exclusively APEC A, then exposure to relatively good air quality is likely. For a site where concentrations meet APEC A and B, but not C, then exposure to moderately good air quality is likely. At sites where concentrations meet APEC C, then there is potential exposure to poor air quality.

**Table 5-1 - Air Pollution Exposure Criteria for annual mean NO<sub>2</sub>**

APEC Category	Applicable Range NO <sub>2</sub> Annual Mean	Recommendation
APEC A	>5% below national objective	No air quality grounds for refusal; however, mitigation of any emissions should be considered.
APEC B	Between 5% below or above national objective	May not be sufficient air quality grounds for refusal, however appropriate mitigation must be considered e.g. Maximise distance from pollutant source, proven ventilation systems, parking considerations, winter gardens, internal layout considered and internal pollutant emissions minimised.

<sup>6</sup> London Councils, Air Quality and Planning Guidance, revised version January 2007. Available from: <https://www.londoncouncils.gov.uk/node/25533> [accessed May 2021].

<sup>7</sup> <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016> [accessed May 2021].

APEC Category	Applicable Range NO <sub>2</sub> Annual Mean	Recommendation
APEC C	>5% above national objective	<p>Refusal on air quality grounds should be anticipated, unless the Local Authority has a specific policy enabling such land use and ensure best endeavours to reduce exposure are incorporated. Worker exposure in commercial/industrial land uses should be considered further.</p> <p>Mitigation measures must be presented with air quality assessment, detailing anticipated outcomes of mitigation measures.</p>

## 5.3 POTENTIAL AIR QUALITY IMPACT IN THE LOCAL AREA

- 5.3.1. The potential impact on air quality of individual site allocations has been indicated very simply by:
- Determining if there is an AQFA within 1km of the site. If true then a score of 1 has been assigned, otherwise the score is 0. The score of 1 indicates that the surrounding area is likely to have relatively high sensitivity to air quality impacts due to high baseline pollutant concentrations and population density; and
  - Considering the size of the site either in terms of estimated housing capacity or area. The GLA's definition of major development<sup>8</sup> has been applied to determine if there is potential for a substantial air quality impact. If housing capacity is less than 10 or non-residential area less than 10,000m<sup>2</sup> then a score of 0 has been assigned. If either threshold is exceeded then a score of 1 has been assigned.
- 5.3.2. For the IIA, the scores have been interpreted as follows:
- 0 = 'negligible effect';
  - 1 = 'minor negative effect'; and
  - 2 = 'significant negative effect'.
- 5.3.3. This simplistic methodology means that it is inevitable that all sites in combination are indicated to have a significant negative effect.
- 5.3.4. In addition, potential air quality impacts have been considered in the context of the Index of Multiple Deprivation for 2019, which are National Statistics published by the Ministry of Housing, Communities and Local Government<sup>9</sup>. The published data are grouped in discrete geographical areas. For the appraisal, these data have been organised into 'quintiles', where quintile 1 is the most deprived 20% of the population, and quintile 5 is the least deprived 20% of the population. The data have been examined to determine the percentage of the existing resident population within each quintile within 1km of each site allocation.

<sup>8</sup> The London Plan 2021. Available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021> [accessed May 2021].

<sup>9</sup> <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [accessed May 2021].

## **5.4 RISK OF ADVERSE AIR QUALITY IMPACTS AT DESIGNATED ECOLOGICAL SITES**

- 5.4.1. To determine the risk of adverse air quality impacts at designated ecological sites, a simple qualitative risk assessment based on proximity to site allocations and roads within 200m has been undertaken.

## 6 SUMMARY OF FINDINGS

6.1.1. The findings of the appraisal of individual site allocations are provided in Appendix A (Volume 3).

### 6.2 EXPOSURE TO AIR POLLUTION AT SITE ALLOCATIONS

6.2.1. Table 6-1 sets out the findings for each site allocation with housing provision. The findings are also illustrated in Figure 5 (Volume 2).

**Table 6-1 - Exposure at each site allocation with housing**

Sites with good air quality (APEC A)			Sites with moderately good air quality (APEC A & B, but not C)			Sites with poor air quality (APEC C)		
Site Ref	Site Name / Address	Estimated Number of Residential Units	Site Ref	Site Name / Address	Estimated Number of Residential Units	Site Ref	Site Name / Address	Estimated Number of Residential Units
SA3	100 Church St Enfield EN2 6BQ	56	SA6	Southbury Road Superstore Area EN1 1NW	291	SA1	St Ann Catholic High School Enfield EN2 6EL	236
SA4	Enfield Town Station + Former Enfield Arms	6	SA8	Sainsburys Crown Road	1041	SA2	Palace Gardens Shopping Centre Enfield EN2 6SN	350
SA7	Oak House	55	SA11	Southbury Leisure Park	450	SA5	Civic Centre	150
SA18	South east corner of North Middlesex University Hospital	400	SA12	Tesco Ponders End	350	SA9	Colosseum Retail Park EN1 3FD	1587
SA20	Asda Southgate	165	SA14	Chiswick Road Estate	272	SA10	Morrisons Southbury Road	892
SA21	Southgate Office Village 286 Chase Road N14 6HF	125	SA26	Station Road New Southgate	203	SA13	Edmonton Green Shopping Centre	1173
SA22	M & S Food	150	SA30	Claverings Ind Est	587	SA15	Joyce Avenue &	1217

Sites with good air quality (APEC A)			Sites with moderately good air quality (APEC A & B, but not C)			Sites with poor air quality (APEC C)		
Site Ref	Site Name / Address	Estimated Number of Residential Units	Site Ref	Site Name / Address	Estimated Number of Residential Units	Site Ref	Site Name / Address	Estimated Number of Residential Units
							Snells Park Estate Regeneration	
SA23	Minchenden Car Park	48	SA41	Albany Leisure Centre	30	SA16	Public House 50-56 Fore Street N18 2SS	68
SA23	Alan Pullinger Centre	0	SA44	Land opposite Enfield Crematorium (aka The Dell). Great Cambridge Road EN1 4DS	160	SA17	Upton Road and Raynham Road	198
SA24	Arnos Grove Station Car Park	162				SA19	Meridian Water	5000
SA27	Land at Crews Hill	3000				SA25	Site between North Circular Road and Station Road	230
SA29	Land to the Rear of Arnold House (East)	36				SA28	Chase Park	3000
SA29	Arnold House	36				SA31	Cockfosters Station Car Park (Parcel a) Cockfosters Road Barnet	316
SA32	Sainsburys Green Lanes	299				SA31	Cockfosters Station Car Park (Parcel b) Cockfosters Road, Barnet	0

Sites with good air quality (APEC A)			Sites with moderately good air quality (APEC A & B, but not C)			Sites with poor air quality (APEC C)		
Site Ref	Site Name / Address	Estimated Number of Residential Units	Site Ref	Site Name / Address	Estimated Number of Residential Units	Site Ref	Site Name / Address	Estimated Number of Residential Units
SA34	241 Green Street EN3 7SJ	92				SA33	Blackhorse Tower Holbrook House and Churchwood House 116 Cockfosters Road EN4 0DY	200
SA35	Land at former Wessex Hall Building EN3 7TU	110				SA36	188-200 Bowes Road  N11 2JH	86
SA37	Main Avenue Site	82				SA38	Land at Ritz Parade	79
SA39	Travis Perkins Palmers Green Bridge Drive Broomfield Lane N13 4EU	76				SA42	Fords Grove Car Park	24
SA40	Brimsgate Sports Ground	50						
SA43	Lodge Drive Car Park	18						
SA45	Land between Camlet Way and Crescent W Hadley	270						

6.2.2. Site allocations with APEC C may require measures to protect new residential population from poor air quality. In the future, poor air quality is likely to be associated with annual mean PM<sub>2.5</sub>

concentrations that exceed the WHO guideline value of 10µg/m<sup>3</sup>. At present, this guideline value is exceeded right across London and is not set as a standard in legislation.

## 6.3 POTENTIAL AIR QUALITY IMPACT IN THE LOCAL AREA

6.3.1. Table 6-2 sets out the potential impacts for each site allocation for the IIA. The findings are also illustrated in Figure 6 (Volume 2).

**Table 6-2 - Potential air quality impacts at each site allocation**

Site Allocation	Site Name / Address	Proposed Use	In Baseline (Low) Growth Scenario?	In Medium Growth Scenario?	IIA Objective 11: Minimise Air Pollution
SA23	Alan Pullinger Centre	Housing	Y	Y	Negligible effect
SA31	Cockfosters Station Car Park (Parcel b) Cockfosters Road, Barnet	Housing	Y	Y	Negligible effect
SA50	6 Morson Road	Industrial	Y	Y	Negligible effect
SA53	Car Park Site Wharf Road	Industrial	N	Y	Negligible effect
SA4	Enfield Town Station + Former Enfield Arms	Housing	Y	Y	Minor negative effect
SA27	Land at Crews Hill	Housing	N	Y	Minor negative effect
SA28	Chase Park	Housing	N	Y	Minor negative effect
SA29	Land to the Rear of Arnold House (East)	Housing	Y	Y	Minor negative effect
SA29	Arnold House	Housing	Y	Y	Minor negative effect
SA30	Claverings Ind Est	Mixed Use	N	Y	Minor negative effect
SA31	Cockfosters Station Car Park (Parcel a) Cockfosters Road Barnet	Housing	Y	Y	Minor negative effect
SA32	Sainsburys Green Lanes	Mixed Use	Y	Y	Minor negative effect
SA33	Blackhorse Tower Holbrook House and	Housing	Y	Y	Minor negative effect



Site Allocation	Site Name / Address	Proposed Use	In Baseline (Low) Growth Scenario?	In Medium Growth Scenario?	IIA Objective 11: Minimise Air Pollution
	Churchwood House 116 Cockfosters Road EN4 0DY				
SA34	241 Green Street EN3 7SJ	Mixed Use	Y	Y	Minor negative effect
SA35	Land at former Wessex Hall Building EN3 7TU	Housing	Y	Y	Minor negative effect
SA40	Brimsdown Sports Ground	Mixed Use	N	Y	Minor negative effect
SA41	Albany Leisure Centre	Housing	Y	Y	Minor negative effect
SA42	Fords Grove Car Park	Housing	Y	Y	Minor negative effect
SA45	Land between Camlet Way and Crescent West Hadley	Housing	N	Y	Minor negative effect
SA46	Crown Road Lorry Park	Industrial	Y	Y	Minor negative effect
SA48	Land at 135 Theobalds Park Road	Industrial	Y	Y	Minor negative effect
SA49	Land to the south of Millmarsh Lane	Industrial	Y	Y	Minor negative effect
SA54	Junction 24 - Part New Cottage and Holly Hill Farm	Industrial	N	Y	Minor negative effect
SA56	Land at Picketts Lock N9 0AS	Sporting/leisure	Y	Y	Minor negative effect
SA57	Whitewebbs Golf Course	Nature recovery	Y	Y	Minor negative effect
SA58	Alma Road Open Space	Burial	Y	Y	Minor negative effect
SA60	Sloemans Farm	Burial	Y	Y	Minor negative effect
SA1	St Ann Catholic High School Enfield EN2 6EL	Housing	Y	Y	Significant negative effect

Site Allocation	Site Name / Address	Proposed Use	In Baseline (Low) Growth Scenario?	In Medium Growth Scenario?	IIA Objective 11: Minimise Air Pollution
SA2	Palace Gardens Shopping Centre Enfield EN2 6SN	Housing	Y	Y	Significant negative effect
SA3	100 Church St Enfield EN2 6BQ	Housing	Y	Y	Significant negative effect
SA5	Civic Centre	Mixed Use	Y	Y	Significant negative effect
SA6	Southbury Road Superstore Area EN1 1NW	Mixed Use	Y	Y	Significant negative effect
SA7	Oak House	Housing	Y	Y	Significant negative effect
SA8	Sainsburys Crown Road	Mixed Use	Y	Y	Significant negative effect
SA9	Colosseum Retail Park EN1 3FD	Mixed Use	Y	Y	Significant negative effect
SA10	Morrisons Southbury Road	Mixed Use	Y	Y	Significant negative effect
SA11	Southbury Leisure Park	Mixed Use	Y	Y	Significant negative effect
SA12	Tesco Ponders End	Mixed Use	Y	Y	Significant negative effect
SA13	Edmonton Green Shopping Centre	Mixed Use	Y	Y	Significant negative effect
SA14	Chiswick Road Estate	Housing	Y	Y	Significant negative effect
SA15	Joyce Avenue & Snells Park Estate Regeneration	Housing	Y	Y	Significant negative effect
SA16	Public House 50-56 Fore Street N18 2SS	Housing	Y	Y	Significant negative effect
SA17	Upton Road and Raynham Road	Housing	Y	Y	Significant negative effect
SA18	South east corner of North Middlesex University Hospital	Housing	Y	Y	Significant negative effect

Site Allocation	Site Name / Address	Proposed Use	In Baseline (Low) Growth Scenario?	In Medium Growth Scenario?	IIA Objective 11: Minimise Air Pollution
SA19	Meridian Water	Housing	Y	Y	Significant negative effect
SA20	Asda Southgate	Mixed Use	Y	Y	Significant negative effect
SA21	Southgate Office Village 286 Chase Road N14 6HF	Mixed Use	Y	Y	Significant negative effect
SA22	M & S Food	Mixed Use	Y	Y	Significant negative effect
SA23	Minchenden Car Park	Housing	Y	Y	Significant negative effect
SA24	Arnos Grove Station Car Park	Housing	Y	Y	Significant negative effect
SA25	Site between North Circular Road and Station Road	Housing	Y	Y	Significant negative effect
SA26	Station Road New Southgate	Housing	Y	Y	Significant negative effect
SA36	188-200 Bowes Road N11 2JH	Housing	Y	Y	Significant negative effect
SA37	Main Avenue Site	Housing	Y	Y	Significant negative effect
SA38	Land at Ritz Parade	Mixed Use	Y	Y	Significant negative effect
SA39	Travis Perkins Palmers Green Bridge Drive Broomfield Lane N13 4EU	Mixed Use	N	Y	Significant negative effect
SA43	Lodge Drive Car Park	Housing	Y	Y	Significant negative effect
SA44	Land opposite Enfield Crematorium (aka The Dell). Great Cambridge Road EN1 4DS	Housing	N	Y	Significant negative effect
SA47	Ravenside Retail Park	Industrial	Y	Y	Significant negative effect

Site Allocation	Site Name / Address	Proposed Use	In Baseline (Low) Growth Scenario?	In Medium Growth Scenario?	IIA Objective 11: Minimise Air Pollution
SA51	Montagu Ind Estate	Industrial	Y	Y	Significant negative effect
SA52	Ramney Marsh Mollison Avenue	Industrial	N	Y	Significant negative effect
SA55	Land at Innova Park	Industrial	N	Y	Significant negative effect
SA59	Firs Farm Recreation Ground (Part)	Burial	Y	Y	Significant negative effect
SA61	Church Street Recreation Ground	Burial	Y	Y	Significant negative effect
SA62	Tottenham Hotspur Football Club - Training Ground	Sporting/leisure	Y	Y	Significant negative effect

6.3.2. In the medium growth scenario, there are 38 site allocations that would potentially give rise to a significant negative effect, compared to 34 in the baseline scenario. There are 23 site allocations giving rise to a minor negative effect, compared to 17 in the baseline scenario. Only 4 site allocations have negligible effect, compared to 3 in the baseline scenario.

6.3.3. Figure 7 (Volume 2) shows that many of the site allocations with potential significant negative effect have resident population in the most deprived category (quintile 1) within 1km. In the medium growth scenario, there are 21 allocation sites with potential significant negative effect where more than 10% of the resident population within 1km are in quintile 1, compared to 18 in the baseline scenario.

6.3.4. This qualitative analysis gives an indication as to which site allocations should be focussed on more closely during the detailed air quality assessment at the Regulation 19 stage, so that appropriate mitigation can be identified.

## 6.4 RISK OF ADVERSE AIR QUALITY IMPACTS AT DESIGNATED ECOLOGICAL SITES

Table 6-3 sets out the potential risk of adverse air quality impacts at the designated sites.

**Table 6-3 - Risks at designated ecological sites**

Designated Ecological site	Risk	Commentary	Mitigation Focus
Chingford Reservoirs SSSI	Low	Entirely within the borough. Nearest site allocation:	None required

Designated Ecological site	Risk	Commentary	Mitigation Focus
		<ul style="list-style-type: none"> <li>▪ ~50m with Option 2A; and</li> <li>▪ ~14m with Option 3C.</li> </ul> Main roads within 200m. Designation due to presence of bird species. Nitrogen sensitive supporting habitat not present.	
Lee Valley SPA / Ramsar, south of LBE	Moderate	Entirely outside the borough. Nearest site allocation: <ul style="list-style-type: none"> <li>▪ ~0.7km with Option 2A; and</li> <li>▪ ~0.7km with Option 3C.</li> </ul> A1055, A503 and B179 within 200m.	Road traffic emissions
Lee Valley SPA / Ramsar, north of LBE	Low	Entirely outside the borough. Nearest site allocation: <ul style="list-style-type: none"> <li>▪ ~2.6km with Option 2A; and</li> <li>▪ ~1.1km with Option 3C.</li> </ul> No A, B or classified unnumbered roads within 200m. Few unclassified roads serving existing adjacent residential areas within 200m.	None required
Wormley-Hoddesdon Park Woods SAC, north of LBE	Moderate	Entirely outside the borough. Nearest site allocation: <ul style="list-style-type: none"> <li>▪ ~4.2km with Option 2A; and</li> <li>▪ ~4.2km with Option 3C.</li> </ul> A short section (less than 100m) of the A10 is within 200m (174m at nearest point) to the south of Hoddesdon Interchange within Broxbourne district. Darnicle Hill is the only classified unnumbered road within 200m. All other roads within 200m are unclassified.	Road traffic emissions
Epping Forest SAC, east of LBE	High	Entirely outside the borough. Nearest site allocation: <ul style="list-style-type: none"> <li>▪ ~1.7km with Option 2A; and</li> <li>▪ ~1.5km with Option 3C.</li> </ul> Relatively high density of A, B and classified unnumbered roads within 200m.	Road traffic emissions

6.4.1. Potential mitigation at this stage is focussed on road traffic emissions at the sites with moderate or high risk of potential impacts. These sites will be the primary focus of the detailed quantitative air



quality assessment to be undertaken at the Regulation 19 stage. This will help quantify the impacts of road emissions such that effective mitigation can be identified and implemented.

## **6.5 FURTHER WORK**

- 6.5.1. The findings of the assessment presented here will feed into the HRA being prepared for the Local Plan, as well as the IIA chapters for Biodiversity, Climate Change Adaptation and Mitigation, Communities, and Health and Transport. The assessment will also help to inform the focus of the detailed quantitative air quality assessment to be undertaken at the Regulation 19 stage, so that appropriate mitigation can be identified.



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