Dear Sadiq

Second Stage Air Quality Consultation

I welcome the opportunity to respond to the second stage of your consultation to improve London’s air quality. Unfortunately, it would appear that Enfield Council’s response to the first stage was missed; however, I am pleased to see that the majority of our points were captured through the comments of other respondents.

Nonetheless, it is important to emphasise a point from stage one. Whilst it is reassuring that you are being pro-active in seeking to improve air quality in our city, the issue of poor air quality is obviously much wider than London and we must therefore intensify efforts to lobby Central Government to take bolder action in tackling the underlying causes of pollution.

Obviously, I don’t need to tell you how significant an issue air quality is and how harmful it is to people’s health, which is well documented in the 2015 Kings College Report. This demonstrated that in Enfield alone, some seventeen percent of deaths are related to air pollution and transport emissions form a major part of this.

Measures such as a London-wide Ultra-Low Emission Zone (ULEZ) would have a significant impact and contribute substantially to improving air quality by reducing harmful emissions from vehicles. This would see significant health benefits for the borough’s residents, potentially preventing illness, which is costly to the National Health Service, and even help reduce incidences of premature deaths.

It is evident that radical action is required and this has recently been emphasised through the recent court proceedings brought against the UK Government by Client Earth. This issue is critical and should be treated as such through the implementation of bold and drastic measures which will have an immediate and positive impact. A London-wide ULEZ is a perfect example of such a measure and as such, without the implementation thereof, sadly this Council cannot support proposals to implement a scheme which finishes at, but does not include the North/South Circular Road for the reasons given below. Indeed, in ‘A city for all Londoners’ you note that rising inequality is a major challenge to London and that social integration requires measures to

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reduce health inequality. It would therefore be counterproductive if you were to now implement measures that work against your own stated objectives.

**Emissions Surcharge**

The Council broadly supports the introduction and proposed implementation date of a new £10 Emissions Surcharge on the Congestion Charge to discourage the use of older, more polluting vehicles in central London to improve air quality and health. Nonetheless, there needs to be a recognition that older, more polluting cars are in the main driven by poorer residents and this can only be supported if there is a corresponding scrappage scheme in place that helps subsidise those with older vehicles to purchase newer more fuel efficient vehicles.

However, there is still a concern that its impact will be fairly minimal given the relatively small number of vehicles it will effect and even less so with the proposals to allow residents living within the Congestion Charge Zone (the zone) to pay a discounted rate of £1. It is also incredibly disappointing to see that the intention is for the surcharge to continue to apply to the Congestion Charge times (07:00-18:00 Monday-Friday), which doesn’t send out the right message that air quality is a 24/7 issue. I, therefore, strongly urge you to reconsider these proposals.

**Bringing ULEZ forward to 2019**

The Council is supportive of plans to introduce the ULEZ one year earlier than originally planned, in 2019. However, this should be subject to appropriate exemptions and support, especially for smaller businesses that already had plans in place to become compliant by the original introduction date of September 2020 and who will be facing significant additional costs in order to become compliant earlier.

**Expanding the ULEZ to inner London**

As noted above the Council will only support an extended ULEZ which covers the whole of the Greater London Authority boundary as opposed to one which starts and finishes at, but does not include the North/South Circular Roads, thus creating a very unnecessary divide across London. This approach is more consistent as it means all Londoners will be playing their part and will also mean our borough will not, in effect, be cut in to two, which would most likely cause confusion and controversy amongst our residents. A North/South Circular ULEZ will only serve to create a 2-tier system of health protection from the effects of air pollution and sends the message that Inner London matters more than Outer London. All Londoners should be given an equal chance to benefit as much as practicably possible from the ULEZ in order for it to have the maximum impact.

I would like to expand on this further by re-emphasising some points from Enfield’s response to stage one of the consultation:

- Early modelling shows that the benefit of an inner London ULEZ for Enfield and for other outer London boroughs is extremely small. The overall predicted change in nitrogen dioxide emissions for outer London as a whole will be -6% and for Enfield in particular it is only expected to be -4%. This compares with -25% in inner London, which is unacceptable especially as air quality is not a static issue, with its
effects felt everywhere. Therefore, nowhere in London should be exempt from the ULEZ;

- Apart from Barking and Dagenham, Enfield is expected to achieve the lowest overall reduction in nitrogen dioxide out of all boroughs which have the North/South Circular running through them. This is clearly not acceptable given the degree of adverse impact it could potentially have;
- There is a high likelihood that this option will displace some of the traffic trying to avoid the ULEZ onto local roads and will also make traffic and air quality on and around the North Circular and surrounding roads worse. Again, this is not something that the Council can support.

On the other hand, a London-wide ULEZ would have a much greater impact, both for inner and outer London boroughs, and will more effectively demonstrate that you are serious about tackling air pollution across the whole of London. Whilst I agree with you that the main hotspots in outer London are located along the main strategic road network, we nonetheless need to be giving a strong message to everyone using the road network that if they wish to travel and do business in London then they need to think about the impact its having on not just themselves, but to people around them and on the environment.

A London-wide ULEZ would also be better because:

- Early modelling indicates savings in annual nitrogen dioxide emissions in Outer London with a London-wide option to be 30%. Enfield would expect to see a 23% reduction which could mean that the AQMA status is removed. This could also happen in other boroughs which is a far bolder step and will have a far greater positive impact on people’s health;
- It would not disproportionately impact residents of boroughs which have the North and South Circular Roads running through them. As noted above, I am incredibly worried about the impact it will have on Enfield’s residents and businesses in terms of the proposed ULEZ boundary and the confusion this could cause; but also
- A London-wide ULEZ could encourage a greater shift away from private vehicle use, complementing initiatives such as the Mini-Holland programme, which will promote active travel while reducing congestion, the number of vehicle miles travelled and the number of collisions.

All this being so, it does seem perverse that you are only consulting on the North/South Circular option, particularly so when I understand that other boroughs and Londoners themselves have suggested a London-wide ULEZ would have a greater impact and is a much fairer option.

It is also not clear why a London-wide ULEZ for heavy vehicles would be more beneficial for outer London, where any negative impacts are expected to occur and how they will be mitigated. Ultimately, if the decision is to overlook the views of boroughs and have an inner London ULEZ for all vehicles as well as a London-wide ULEZ for heavy vehicles, then boroughs should be able to decide if they want to be a part of the ULEZ. Indeed, as things stand, the worthy commitments made in the consultation document ‘A city for ALL Londoners, would not be achieved via the creation of an inner London only ULEZ.

Further work is needed to ascertain how an expanded ULEZ in any form will be enforced. In Enfield it would be arguably easier to enforce a London-wide ULEZ for all
vehicles given that there are only 7 entry points to the borough from the M25, compared to over 20 from the North Circular Road. This would need to be done in full partnership with the boroughs. I would also be interested to know how the ULEZ will be funded in the first instance and how it will continue to be funded beyond the point when compliance surpasses any revenue generated as part of the scheme.

The date of implementation for an expanded ULEZ would depend on when it is feasibly possible and also on what supporting measures will be in place to help people to become compliant as quickly as possible. The sooner this happens, the bigger the effect it will have.

You also have a duty to make sure the transition is as easy and as affordable as possible for individuals and for businesses, especially those on low incomes and small companies. As noted above, timing is key here and although a sunset period (3 years) is a good idea and something the Council agrees with, efforts must be put towards helping people to become compliant sooner rather than later during this period. This doesn’t just apply to people living in London, it also applies to those who work and drive into London on a daily basis, but live beyond the boundary, because they too contribute to poor air quality in the city. But given that the issue of poor air quality is a national one overall, this only emphasises why Central Government and other local authorities must take bold action sooner rather than later.

As stated elsewhere, to help people to become compliant, we should lobby Central Government to reintroduce a car scrappage and subsidy scheme to help and those on low incomes, who generally driver older, more polluting vehicles, to purchase newer more compliant vehicles.

Finally, there must be a thorough communications campaign, which clearly sets out how the zone will be administered and when it will come into place and who it will affect. It is vital that this process is transparent and is developed in close alliance with all London boroughs.

I hope these comments help the consultation going forward and assist in shaping the outcome. However, if you need anything clarifying, please do not hesitate to contact me.

Yours sincerely

Cllr. Daniel Anderson
Cabinet Member for Environment
London Borough of Enfield

c.c. Joanne McCartney AM for Enfield and Haringey, Deputy Mayor
Val Shawcross CBE, Deputy Mayor, Transport

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