

Bowes Cabinet Paper Call in responses – Jun 21

(1) Reason why decision is being called in:

- Failure to consult residents- previously only actioned a perception survey, online consultation discriminated against certain groups

Response: there has not been a failure to consult, the trial has been implemented on an Experimental Traffic Order, with an extensive consultation period in place to collect views in light of experiences of the trial. This Cabinet report is not making recommendations on the future of the trial, but makes a recommendation that the trial continues to enable further data collection to take place, to better inform a future decision. There is no detail provided on which groups are thought to have been discriminated against.

- Lack of community engagement- community groups disappointed with the sparse contact from the council and don't feel listened to

Response: A range of engagement has taken place within the context of a global pandemic, where understandable government restrictions have prevented face to face engagement. This has been replaced with online conversations, including specific meetings with a number of community groups and a community webinar. The cabinet report sets out detailed analysis of resident views. However, This Cabinet report is not making recommendations on the future of the trial, but makes a recommendation that the trial continues to enable further data collection to take place, to better inform a future decision.

- Conflicts with the climate change strategy for improving air quality- at the Bowes primary school, nitrogen dioxide levels increased 20% in 8 months since the implementation of LTNs (londonair.org) and council negligently creating pollution with camera car enforcement vehicles engine idling for hours per day sometimes outside a nursery school

Response: The Council monitor two pollutants at Bowes Primary, nitrogen dioxide and PM10 (small particulates). We began monitoring PM10 a couple of years before nitrogen dioxide. Both of these pollutants have standards and objectives, which can

be seen in the table below and the measured pollutant concentrations are compared to these values.

Pollutant	Standard / Objective (UK)	Averaging Period	Date⁽¹⁾
Nitrogen dioxide (NO ₂)	200 µg m ⁻³ not to be exceeded more than 18 times a year	1-hour mean	31 Dec 2005
Nitrogen dioxide (NO ₂)	40 µg m ⁻³	Annual mean	31 Dec 2005
Particles (PM ₁₀)	50 µg m ⁻³ not to be exceeded more than 35 times a year	24-hour mean	31 Dec 2004
Particles (PM ₁₀)	40 µg m ⁻³	Annual mean	31 Dec 2004

The following tables provide you with the results of the monitored data at Bowes Primary from installation up to the end of December 2020.

Table: Results for nitrogen dioxide

Year	Annual Mean (ug/m³)	No. exceedances of hourly mean
2008	59	0
2009	55	18
2010	54	8
2011	45	2
2012	49	24
2013	47	0
2014	43	0
2015	46	1
2016	47	6
2017	45	3
2018	44	0
2019	41	0
2020	30	0

Table: Results for PM10

Year	Annual Mean (ug/m³)	No. exceedances of 24-hour mean
2004	28	12
2005	28	24
2006	27	21
2007	26	21
2008	26	18
2009	25	14
2010	26	4

2011	29	28
2012	24	16
2013	22	4
2014	21	11
2015	19	1
2016	22	10
2017	19	9
2018	18	2
2019	19	9
2020	15	2

You will note that over time the monitoring results for both pollutants have reduced. There is a small variation between years and this will be the influence of weather, for example, as this has a strong influence on pollutant concentrations and this is why long-term trends are needed to decide if concentrations are reducing.

This year, to date, the monitoring data shows that the mean concentration for nitrogen dioxide from 1st January 2021 to 7th July 2021 is 29ug/m³ and there have been no exceedances of the hourly objective. For PM10 the annual mean for the same period this year is 15ug/m³ and there have been no exceedances of the 24-hour mean objective.

The data for the Bowes Primary monitoring site does not show an increase in concentrations of nitrogen dioxide or PM10.

Council enforcement vehicles are now electric.

- Failure to address inequalities impact on residents- rights of disabled not considered yet disability is a protected characteristic under the Equality Act

Response: we are considering the impact on people with a disability. The consultation report breaks down responses by protected characteristic. It identifies issues raised by residents with disabilities. We explored issues in more detail via working groups with residents with disabilities and those who provide care. This work and reviewing the outcomes of consultation and engagement is ongoing. The published Equalities Impact Assessment outlines our approach and will continue to be updated as the trial continues.

- Lack of clear information on funding- funding was to create a safe environment for walking and cycling- this has not happened as no extra cycle lanes were added and pavements were not widened to improve safety for pedestrians

Response: Physical infrastructure is not required to in all locations in order to improve the environment for walking and cycling. By reducing the speed and volume of motor vehicles on minor residential streets the environment is made safer for these activities. This is why this approach is supported by both mayoral and government policies. The DfT letter, provided at Appendix 2, states that, in terms of improving conditions for walking and cycling “the quickest and cheapest way of achieving this will normally be point closures.....point closures can also be used to create low-traffic filtered neighborhoods”.

- Lack of transparency- no heat maps indicating positive and negative responses

Response: We consider the published consultation report to be transparent. The report is very detailed and lists positive and negative points raised by respondents. Streets with the most responses have been listed in the report alongside the number of responses received on those streets.

- Admits traffic displacement onto boundary roads – this shows the scheme has not achieved its objective of reducing the volume of traffic
- Not achieve 3 objectives:
- 1. Streets not safer 2. has not reduced traffic volume but increased it 3. No obvious uptake in walking and cycling

Response: The published monitoring plans sets out the approach to monitoring the project and how data will be used to assess the impact of the trial. The purpose of this Cabinet report is to make a recommendation that the trial continues to enable further data collection to take place, to better inform a future decision.

- The proposal is to allow the Bowes Primary Quieter Neighbourhood trial to continue, to allow an opportunity to collect traffic data that is more representative of ‘normal’ conditions. However, the NO2 has increased since implementation despite there being restrictions throughout due to the working from order reducing commuter traffic and lockdowns proving that even with lower traffic levels pre-COVID the scheme is not improving air quality.

Response: We are measuring the impact on air quality as set out in our Monitoring Plan and will report on this aspect further in the future decision report.

- The report fails to mention the impact of the scheme on residents who live just outside the zone. The report does not state whether there has been an increase in traffic on main roads either that are adjacent to the scheme.

Response: As part of our Monitoring Plan, we are monitoring a number of main roads surrounding the project and will report on this aspect further in the future decision report.

- The appendix shows 83% of respondents owned a car who were the bulk of the respondents and the majority of those are against the scheme. There was a strong trend of respondents with disabilities showing negative perceptions of the project (75 respondents (equivalent to 76% of respondents who said they have a disability) rated the scheme's impact of 'very negative' or 'somewhat negative'. However, the report is seeking to continue with the scheme. The report is negative towards car owners but if they are the ones that have submitted responses they need to be considered. The report proposes to consult and consult to get the result it wants rather than to take into account the negative responses it has already received.

Response: This Cabinet report is not making recommendations on the future of the trial, but makes a recommendation that the trial continues to enable further data collection to take place, to better inform a future decision. Responses from the consultation have been comprehensively set out in this interim report and will be responded to in the future decision report.