

January 2022

Officer Response: Conservative Group Call In – Bowes QN project

Reasons for Call in summary by the Conservative Group:

Main purpose of the trial was to reduce the motor traffic within the Bowes area and improve healthy physical activity like walking and cycling- this has failed to materialise.

Reason for call-in

1.The Council must provide its reasons for an experimental traffic order (ETO) and those reasons must be set out in the Statement of Reasons and not use the Mayor’s Transport Strategy to support this.

Amendments to an ETO can only be made within the first 12 months of its 18-month cycle to enable the statutory 6-month statutory objection period to run. No further amendments can be added to this traffic order.

Officer response

The creation of healthier streets in the Bowes Primary Area was the context in which the ETOs were made. This was specifically articulated in the Statement of Reasons in a number of different ways:

“Removing through traffic within these neighbourhoods is likely to establish more attractive conditions for walking and cycling, with modal filters for cycling at the closure points further boosting the convenience of cycling over car use for local trips”.
“Lowering the level of traffic on Palmerston Road will make it better suited for on-road cycling, helping complete a cycle route into Haringey that already links to Palmers Green and Enfield Town to the north”.

“Reducing the overall volume of traffic to levels that better match the character of these narrow, densely populated streets will also improve air quality within the zone”.
The Statement of Reasons for the ETO therefore align totally and consistently with what is referred to in the report: that one of the project’s objectives was to *“Create healthier streets . . . in line with the Healthy Street Indicators as set out in the Mayor’s Transport Strategy”.*

Although an ETO cannot be amended after 12 months, any subsequent permanent order can be amended where necessary and following the appropriate procedural steps. Any subsequent changes to the permanent order that may enhance the scheme will be explored by Officers.

Reason for call-in

2. Enfield Healthy Streets Framework policy post-dates the implementation of the Bowes QN ETO and cannot be applied to support the scheme retrospectively.

Officer response

This is incorrect in principle. When making a decision on the project the Council should consider all relevant material, whether this was in place before or after the ETO came into effect. The Enfield Healthy Streets Framework clearly sets out the commitment to creating Quieter Neighbourhoods and that Low Traffic Neighbourhoods are an approach that could be used to achieve this. This framework, approved by Cabinet in Jun 21, was subjected to its own process of scrutiny. It is entirely right that this framework is considered, along with any other relevant information since the making of the ETO, when reaching a decision on the Bowes QN. However, it should also be noted that this Enfield Framework sought to provide clarity on the activities that the Council would conduct in order to deliver on a range of policies already in place, including the Mayors Transport Strategy, first published in 2018.

Reason for call-in

3. Lack of comprehensive training for officers attending those focus groups with disabled people in relation to the Public Service Equality Duty which meant they could not fully understand the consequences of this scheme for the disabled.

Officer response

Officers attending the focus groups understand the Council is required to comply with the Public Sector Equality Duty under the Equality Act 2010. This is set out in para 143 of the report. Officers have undertaken training in the Equalities Impact Assessment (EQIA) process. Several versions of the EQIA have been published during the ETO period with the latest version available at Appendix 9 of the report. The focus groups were an opportunity for Officers to listen to the views of people with disabilities which contributed towards the following at para 7:

“A subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities”.

The Council is currently working closely with Transport for All, a pan-London disability organization, to develop a Healthy Streets Disability Reference Group. This will enable the Council to continue to increase its understanding of the impact of these types of projects on people with disabilities. This approach is seen as good practice across London and welcomed by the groups involved.

Reason for call-in

4. Blue Badge Holders - not everyone received a letter/survey to complete-of those that did participate in the survey, 76% claimed they suffered negatively from the scheme.

Officer response

A list of Enfield Blue Badge Holders who live within the Quieter Neighbourhood area, including their details, was provided to the Healthy Streets Team from the Concessionary Travel Team. A letter and a copy of the survey were hand-delivered to these addresses by an external distribution company. In addition, where email addresses were held for Blue Badge Holders within the Quieter Neighbourhood Area, emails were sent to these residents informing them about the survey. Any person who responded to the consultation survey by the time of the letter going to print and indicated they are disabled, provide or receive care were sent an email informing them about the survey.

Blue Badge Holders are referred to in the EqIA (Appendix 9 of the report). The EqIA process contributed towards paragraph 7, which states:

“A subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities”.

Reason for call-in

5. Contradictory reports on bus delays – Bowes report says bus journey times improved yet the Green Lanes Priority Scheme shows buses are operating with significant delays. This point has not been explored in the report.

Officer response

The Bowes monitoring report focusses on the difference in delays between the two survey periods before and after implementation of the Bowes Scheme, to assess whether or not the Bowes Scheme is likely to have affected bus journey times. The monitoring did not assess or provide comment on whether or not the baseline bus journey times are considered acceptable, only on what the changes are from the baseline data. The Council will continue to explore ways to improve bus journey times and measures that look to prioritise public transport and active travel. TfL has been closely involved and has not raised objections to the scheme being made permanent.

As outlined at para 60:

“Enfield has an ongoing work programme to work with TfL to identify measures to improve the operation of buses. As part of this ongoing programme, Enfield has been working to develop a proposal to improve journey times and reliability on Green Lanes. This work was underway prior to the Covid-19 pandemic and the implementation of the Bowes QN. In October 2021, plans to extend the operational

hours of the northbound bus lanes were published. More information can be found on the Enfield Let's Talk website".

Reason for call-in

6. Active travel shows no increase – only 3 sites were monitored for pedestrian activity- this is a very small sample to make any comment that would be taken into account for making a decision.

Officer response

To assess any changes in walking behaviour, it was considered sufficient to carry out surveys at key locations only. There is a balance to be made between the level of surveys that should be undertaken for the scheme and 3 key corridors within the Quieter Neighbourhood area were considered reasonable for the pedestrian analysis of conditions before the scheme was implemented. The COVID pandemic is also likely to have impacted pedestrian movements and therefore the results. This view of pedestrian activity, along with the other assessed factors of the trial, contributes to the overall judgement that is applied in reaching recommendations.

Paragraph 198 of the report states:

"The early indications of an uptake in cycling and larger increases in people walking provide a foundation upon which levels can increase into the longer-term."

Reason for call-in

7. Cycling data is misleading- some roads recorded a large increase in cycling due to the abnormally low traffic flow before the scheme. If you exclude these 3 roads, the 15 roads show a decrease.

Officer response

The justification for removing roads from the data set that have seen large increases in cycle numbers is not clear in this reason for call-in. It is accepted that some roads have seen decreases whilst other roads have seen increases, but if the total number of cyclists recorded is analysed in the project area, the data shows a higher number of cyclists in the post-scheme survey compared to the pre-scheme survey.

Reason for call-in

8. Traffic data is not representative. The report has been selective on traffic data - traffic data is missing from 8 of the 29 roads monitored.

Officer response

Where traffic surveys have not been included in the main body of the report it is because the sites either have no pre-scheme data or out of date data from 2016, so have been reported separately within the Appendix.

Reason for call-in

9. Inaccuracy of traffic counters – The report references that traffic counters measured between 16th-28th September. However, this was during the petrol shortage period and therefore is not representative.

Officer response

The Addendum provides clarification on how the issue of the petrol shortage period has been reviewed, with data affected by the petrol shortage removed from the analysis. This Addendum was advance published and was available for consideration prior to the decision being made.

Reason for call-in

10. Pollution and Noise Modelling- the report data is misleading as traffic data is missing and therefore an accurate analysis cannot be made- limited time modelling carried out.

Officer response

Limitations of the assessments are clearly addressed in paragraphs 3.17 and 3.18 in the Noise Assessment (Appendix 4 of the report), and paragraphs 3.16 to 3.21 in the Air Quality Assessment (Appendix 5 of the report).

The exclusion of the North Circular Road in the Air Quality Assessment is addressed in paragraph 3.15 of the Air Quality Assessment.

Reason for call-in

11. Bias against car owners- car owners have mostly reported negative responses and make up a large number of respondents. However, these views appear to have been disregarded by the decision maker despite them being the biggest group. The report does not give the same weight to responses from car owners as it does to non-motorists otherwise the decision would not be to make the scheme permanent.

Officer response

The response considers the range of views provided and balances these alongside the objectives of the project scheme and the other areas of focus that form the monitoring approach. The report acknowledges that the scheme is more likely to impact car owners compared to non-car owners. The report makes recommendations after considering the impacts of the project and weighing these against the policy context, objectives of the scheme and requirement to address the over-reliance on private car use.

Reason for call-in

12. Residents rejecting the LTNs- the report ignores the survey participants' views - there were overwhelming reasons opposing scheme.

Officer response

The report does not ignore the survey participants views. The Community engagement associated with the project is set out at para 113 – 135 of the report. This is further supported by a detailed Appendix 8 'Consultation Analysis'. The views of the community were considered alongside the other aspects of the monitoring plan. As set out in table 5:

"The Council is often accused of not listening when it makes a decision that may not have universal acceptance. The Council has ensured that consultation feedback has been carefully analysed and collated into a report by an external organisation. This report is fully published in Appendix 8 and the key themes have been discussed. The range of objections have been listed in Annex 5 and a response provided to each, demonstrating that all the issues raised have been considered. The Council has a responsibility to balance up these views with long term benefits to the local and regional areas and how these contribute towards national and global challenges".

And in conclusion at para 199:

"This report and the associated annexes and appendixes set out a wide range of information relevant to this project. It is acknowledged that a number of objections have been raised on making these changes permanent. These objections and the assessment of the wider impacts need to be carefully considered against the context of a climate emergency and ongoing national and international concerns about lack of action".

It is therefore incorrect to suggest that the report ignores the views of survey participants.

Reason for call-in

13. Crime offences have increased 8% across Bowes. Crime figures are higher compared to the rest of Enfield showing a clear link of higher crime levels with the implementation of the QN scheme.

Officer response

Para 84 of the report and Appendix 3 provides data on the monitoring of crime. *"There has been a 2% decline overall in offence numbers since implementation of the QN. Offences across the Bowes and Southgate Green wards have increased by an average of 7% within the same time period."*

It is not agreed that the data shows a clear link between crime and the QN area. The

Met Police have not objected to the scheme being made permanent.

Reason for call-in

14. Poor street lighting in Bowes. The report fails to take into account the poor street lighting in Bowes which in addition to the scheme compounds the safety of residents especially women who have reported that they have felt vulnerable since the QN was implemented.

Officer response

In response to feedback from residents the Council has adjusted lighting levels in Bowes Ward so that they are operating at their maximum power output. In addition, their timings have been adjusted so that they now automatically switch on a little earlier in the evening and stay on a little later in the morning.

Officers are continuing to work closely with the Street Lighting PFI Service Provider to follow up on any locations where residents and Ward Councillors feel that the lighting levels are too low and to undertake photometric tests. Shadowing by trees has been observed to cause problems in a few locations and, where this is a problem, the trees are pruned.

Reason for call-in

15. The impact on mental health has been ignored – the report fails to mention the scheme's impact on mental health due to the isolation and anxiety of people living within the QN.

Officer response

Annex 5 of the report, item 3.2 provides a response to these concerns raised by respondents to the consultation:

“Whilst it is acknowledged that some people may feel this way, the project aims to increase the sense of community within the area and to encourage more interaction between neighbours in an environment that is not dominated by motor traffic.”

With reference to ‘good homes in well-connected neighbourhoods’ of the Council’s Corporate Plan, paragraph 11 of the report states:

“This project supports the Council’s commitment to encourage people to walk and cycle, which improve connectivity of neighbourhoods.”

Paragraph 138 of the report states:

“The positive effects of increased physical activity on health and wellbeing are well documented; it can help prevent and/or ameliorate a range of lifestyle related conditions, e.g. obesity, type 2 diabetes, heart disease, stroke, some cancers, musculoskeletal issues, and poor cognitive and mental health.”

The Healthy Streets Programme is incorporated within Enfield's Joint Healthy and Wellbeing Strategy 2020-2023 and is a key component in delivering on the 'Be active' priority within the Strategy.

The report acknowledges that the QN was delivered during a challenging backdrop of Covid-19.

Reason for call-in

16. Traffic volumes have not been significantly reduced but have been displaced. The report fails to state why the decision maker is confident that the traffic volumes have not been just displaced.

Officer response

One of the key objectives of the Quieter Neighbourhood project was to 'significantly reduce the volume of through motor traffic on minor roads within the project area' and the scope of the surveys allows this objective to be assessed, showing that the objective has been achieved. The extent of the surveyed area is therefore considered reasonable. The impact on bus journey times provides a good indication of the impact of the scheme on external roads that may have been affected by traffic displacement. The monitoring report indicates that the impact on bus journey times is not significant.

Paragraph 20 states:

"The Bowes Primary Area QN is delivered in the context of local, regional and national policies and strategies that seek to respond to the climate emergency, reduce traffic congestion and increase levels of physical activity, and post-pandemic response to enable a green recovery."

This paragraph sets the context that behaviour change occurs over time.

Reason for call-in

17. Impact of Covid pandemic - the report does not thoroughly address the impact that COVID-19 has had on traffic flows during different times of the pandemic.

Officer response

It is very difficult to predict the long-term changes in travel behaviour caused by the COVID pandemic with, for example, people working from home more regularly on a permanent basis. Therefore, traffic patterns may not return to pre-pandemic levels and in which case data collected during the various phases of the pandemic might reasonably reflect traffic conditions and travel behaviour for the foreseeable future. The sensitivity test included in the Appendix of the traffic Post Scheme Monitoring report (Appendix 2 of the main report) seeks to provide an estimate of the traffic flows impact assuming that the COVID pandemic had not occurred.

At para 172, Table 5 the report identifies that:

“The ‘new normal’ of motor traffic volume is currently uncertain. Should the worst case occur and traffic volumes continue to increase then this could lead to more significant impacts than those outlined in this report. The Council will therefore continue with some monitoring activity in the area to be able to identify any significant changes.”

Reason for call-in

18. Ignored warnings from the London Ambulance Service. The report ignores warnings from London Ambulance Service about patient safety from traffic delays.

Officer response

This is incorrect as the report does not ignore the input received from the London Ambulance Service.

Further comment specific to the London Ambulance Service (LAS) is provided at para 77 which in turn refers to both Annex 2 (correspondence from the LAS for this report) and Annex 3 (a detailed response from the Council to this correspondence).

The LAS have not requested the removal of this project and welcome the move by the Council to explore the opportunity to increase the number of ANPR filters used as part of the scheme.

Reason for call-in

19. Ignores the benefits of electric cars. The report fails to take into consideration the role of electric cars as a part solution to reducing emissions which is one of the reasons for the scheme.

Officer response

Table 6 of the report discusses electric vehicles:

“Electric vehicles are an important part of Enfield’s plan to be a carbon neutral borough by 2040, and efforts are being made in accordance with the Enfield Climate Action Plan 2020 to increase electric vehicle charging provision. They however are not a solution on their own. As much as 50% of particle pollution from vehicles comes from brake wear, tyre wear and road surface wear. These particles contribute to what is known as ‘non-exhaust emissions’ particulate matter. Non-exhaust emissions increase with vehicle mass and electric vehicles tend to be heavier than their petrol/diesel counterparts due to the battery mass. An effective way to reduce these emissions is to reduce traffic volumes.

Annex 5 of the report, item 5.10 also states:

“Transition to electric vehicles, and / or ULEZ, is expected to reduce emissions. It is however not expected that on its own would result in meeting the project objectives of the Bowes Primary Area QN.”, and

“Further, other problems associated with motor vehicle use, for example collisions, congestion, and parking availability, will not be solved by a transition to electric vehicles.”

Reason for call-in

20. Residents overwhelmingly reject the Bowes QN - three quarters oppose the scheme, yet the council concludes that there are more benefits than disbenefits and no solutions provided to the traffic volumes on the main roads.

Officer response

As set out in the response to point 12, the views of residents who participated in the consultation have been carefully considered in the report. Indeed, the feedback from residents provides us with important information that helps us amend and improve schemes. An example of this is that *“a subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities”*, as stated in paragraph 7 of the report.

The Council must take decisions based on strategic and local context and longer-term benefits for the borough.

The Council have taken significant measures in recent years to improve the safety and environment on main roads, including the projects implemented on the A105 and A1010. These types of projects will continue to be delivered – by enabling longer-term mode shift, the Council can look to address the problems created by excessive traffic volumes on Borough roads.