January 2022

Officer Response:Bowes QN project

Reasons for Call in summary by Community First:
KD 5402 is being called in on the basis of there being a lack of any robust evidential basis to
support the decision, nor the statement, as outlined in point 2 of the decision statement, which
says, *"Taking into account the various matters set out in the body of the report, the factors in favour of making the experimental traffic orders permanent outweighs the dis-benefits and/or
disadvantages."*
The arguments for the call-in are in summary as follows:

- The assumptions made and models used are not presented in the report
- The impact of the petrol crisis has not been properly accounted for
- There are serious sampling inconsistencies and evidence of a methodological bias
- The analysis is missing from key roads indirectly impacted by the scheme
- There is unclear and missing information relating to traffic assessments, pedestrian
- assessments and cycling analysis
- There is biased and inconsistent interpretation and reliance on opinions, and
- The report fails to explain how it will mitigate the key objectives of Council's Corporate Plan
- undermined by the implementation of the LTN

These arguments are detailed below:

Reason for call-in
<u>The assumptions made and models used are not presented in the report</u>*<u>:</u>*   The comprehensive list of factors referred to in the decision statement have not been defined.   There is a lack of any evidenced-based assumptions, or provision of the models used to   independently verify the statements contained within the report, which therefore fails to provide measurable criteria for reaching the conclusions that have been presented. Instead, the report relies upon opinions, hopes and wishful thinking of a change in behaviour.   For example, item 2 under the section 'Reasons for Proposal' it states, *"With transport accounting for 39% of the Borough emissions, it is essential that this sector plays a key role in moving towards the goal of being a carbon neutral Borough by 2040."*   However, the Bowes Low Traffic Neighbourhood (LTN) objectives are specifically limited to the area directly within the scheme. The precise contribution of the scheme to creating any overall reduction in borough-wide emissions has not been evidenced,

i.e. specified, estimated, or measured.

The scheme therefore fails to model or measure the changes to overall 'traffic minutes' resulting from the introduction of the LTN that can theoretically have a significant bearing on emission levels.

Officer response

The report takes a broad range of factors that were set out in the monitoring plan and provides an assessment of impact against these. 'Traffic Minutes' does not form part of the published monitoring plan. The report also sets outs in detail the policy context and how this project aligns with local, London and national policy direction. The impacts of this specific project are considered against this policy context. In reaching recommendations judgement is applied in balancing the range of impacts over both the shorter and longer-term. These judgements are then open to further consideration by the decision maker as they form their own conclusions. The precise impact of this scheme on reducing Borough emissions is not provided. It is not known. As set out in the Enfield Healthy Streets Framework, approved by Cabinet, there is no singular intervention which will deliver the mode shift required to reduce the high dependency on private car use. The Healthy Streets programme adopts a comprehensive approach to enabling longer-term behaviour change. The report concludes that within a context where action is required, the monitoring of the trial does not suggest that it should be removed. The report proposes a number of aspects that should be explored to enhance the scheme and commits to ongoing monitoring to determine change over time.

Reason for call-in

The Impact of the petrol crisis has not been properly accounted for:

Norman, Rourke & Pryme (NRP Report titled *"Traffic bus pedestrian cycle analysis post scheme monitoring"* in Appendix 2) conducted post-implementation analysis during the petrol crisis, so the data cannot be relied upon as a meaningful comparison. It is concerning that the original report did not mention the potential impact of the petrol crisis.

Following complaints about the first report, some efforts were subsequently made by NRP to
account for the impact of the petrol crisis, but the actions taken by NRP have not been properly thought out, consistently applied, or adequately justified. For example, Bounds Green Road was significantly impacted by the petrol crisis, but the data for this road has not been re-assessed.

Only three of the 37 sample test sites were re-assessed by NRP, which is far too few. Indeed, the re-assessment of the three sites has proven the substantial impact the petrol crisis has on the data. For example, the original data said there was a reduction of 5,970 vehicles over a 24-hr period on Green Lanes, the adjustment of just a single

day (27th September) to try and account for the petrol crisis has reduced this to 1,186 vehicles. However, assessment has not been undertaken by removing other days impacted by the petrol crisis days i.e. 23rd, 24th, 27th, and 28th September from other test sites.

The current data is therefore not robust and is not a sound evidential basis for decision-making or for concluding that traffic volumes have fallen.

Officer response

Most of the monitoring sites (including Bounds Green Road) used survey data up to the 24th September. The shortage in drivers which triggered the closure of a small number of petrol filling stations was reported in the press on the 23rd September. A review of the traffic flow data shows that this did not affect traffic flows on the 23rd or 24th in the Bowes area. The review of the impact of the petrol shortage crisis showed that only 3 out of the 37 monitoring sites used data from the 27th and 28th September, and therefore only the changes in results on these three roads were reported in the Addendum. This Addendum, providing more clarity on how the fuel crisis was considered in the report has been advanced published for consideration prior to any decision.

Para 44 titled 'limitations of the data' outlines the following for the decision maker:

"*The reported changes in the network should not be considered as only influenced by the Bowes QN. This project has been implemented during the pandemic which has created changes in travel patterns. It is not known what longer-term impacts the pandemic will have. Pre-implementation surveys were undertaken in July 2020 while some lockdown restrictions were in place and some schools were closed. Post-implementation surveys were undertaken in September 2021. The analysis includes a 'sensitivity test' where a factor has been applied to mitigate the impacts of Covid on the data. Details of the analysis methodology is in Appendix 2 and Addendum 1.*"

Limitations in the data are clearly communicated to the decision maker, with the report proposing ongoing monitoring to continue to review the impacts.

Reason for call-in

There are serious sampling inconsistencies and evidence of a methodological bias

There are multiple problems with the sampling methodology used in the analysis. For instance, different months of year were used for the pre- and post-implementation analysis, so are not directly comparable. No reasons have been provided as to why different months were selected, nor has there been any attempt to explain the potential pitfalls of doing this.

The appendix slides show that the pre-implementation analysis for Wilmer Way and

Powys Lane was based on counts from a single day, i.e. Friday 4th October 2019, which was pre-pandemic as well as being the busiest day of the week for 24-hour traffic. It is therefore completely inappropriate to compare a single day's data in 2019 with the average data taken across an entire week in 2021 and attribute any differences to the implementation of the LTN. The data points are not in any way comparable. It is not surprising that the data shows a reduction in traffic on these roads. This reduction is more likely to be the result of comparing a single busy day of the week in 2019, with the average across less busy days in 2021 than because of the impact of the LTN. However, these important methodological issues are not referenced in the report.

Likewise, the bus analysis also seeks to compare non-comparable time periods. For example, pre-implementation analysis took place across the Winter of 2019 before the onset of the pandemic, whilst post-implementation analysis was carried out in the Autumn of 2021 during both the pandemic and the petrol crisis. It is therefore not at all possible to know what impact this has had on the data, but at the very least the data should have been benchmarked against data from other sites across the same time periods and the potential issues should have been red flagged within the report.

In terms of the impact of the LTN on cycling, the data from some of the biggest increases, i.e.
Wilmer Way and Powys Lane, are the result of comparing just one day, i.e. a Friday in 2019, with two entire weeks in 2021. However, there is no benchmark analysis to show how cycling activity has changed in those areas away from the LTN, therefore it is impossible to tell if any changes to cycling activity have been due to the introduction of the LTN or due to other factors, such as the pandemic (e.g. working from home), the weather, the petrol crisis, the introduction of school streets etc.

The current sampling issues therefore render the data useless, and it should not be relied upon.

Officer response

COVID-19 restrictions were in place during July 2021, and therefore the decision was taken to delay the surveys until later in the year in the hope that the restriction would be reduced and therefore traffic flows more representative, which was the case in September 2021. Due to the need to comply with the statutory requirements of the Experimental Traffic Order, which can only run for 18 months, it was not possible to delay the surveys until July 2022.

The dates for Wilmer Way and Powys Lane were updated within the updated report included with the Addendum, with 4 days of data available at each site 4th–10th June 2019 (Wilmer Way) and 21st to 27th March 2019 (Powys Lane).

The bus journey time data was supplied by TfL, and Enfield have worked closely with TfL in the review of the bus data. The methodology and survey period dates were agreed with TfL for the assessment process. As stated in the Addendum the bus journey time data had been reviewed for the period of the fuel crisis and only bus Route

221 indicated a significant change during that period and therefore the affected days were removed from the assessment. Bench marking of bus journey times was not considered needed to inform the decision, the key factor to inform the decision was the difference in bus journey times in the vicinity of the scheme before and after implementation, which has been undertaken.

A note is included within the report stating that the COVID pandemic could also have an impact on cycle flows through the area. The report does not specifically state the changes in cycle volumes are a direct result of the Quieter Neighbourhood.

Based on DfT data, July is the most popular month of the year for cycling, which is the pre-implementation survey period, with generally less cyclists in September, which is the post-implementation period, so the presented results are considered a reasonable indication of cycle flow changes across the area to inform the decision. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708741/tra0404.ods

The limitations of the data are further addressed in the response to the previous reason for call in and are not repeated here.

Reason for call-in

The analysis is missing from key roads indirectly impacted by the scheme

Key roads at risk of being negatively impacted by the LTN have not been consistently surveyed and have not been incorporated into the main analysis, i.e. sites 23-27, making it impossible to properly assess the impact of the scheme on the surrounding residential areas and to establish the accurate overall impact.

For example, there does not appear to have been any monitoring on the A406 Telford Road or on Pinkham Way, yet these roads would have been indirectly impacted by the implementation of the LTN. However, no reasons have been given as to why they were not included in the assessment.

The impact analysis is therefore incomplete and missing essential data and cannot be considered a robust evidential basis for decision making.

Officer response

For site 25 (Grenoble Gardens) and site 27 (Berkshire Gardens) data was only available from January 2016, this is a 5-year difference from the 2021 surveys and the traffic flows on the roads could have been affected by a number of external factors outside the Quieter Neighbourhood in this period. Site 23 (Princes Avenue), 24 (Tottenhall Road) and 26 (Upsdell Avenue) had no pre-scheme data. For these reasons it was considered appropriate to report these sites separately to the main surveys, with the summary of these 5 sites included in the Appendix.

The A406 was assessed at Bowes Road (site 29) immediately adjacent to the scheme, which was considered an appropriate location for the monitoring of the A406.

The limitations of the data are further addressed in the response to a previous reason for call in and are not repeated here.

Reason for call-in

There is unclear and missing information relating to traffic assessments, pedestrian assessments and cycling analysis

Traffic assessments: The pre-implementation analysis dates on slide 5 of the report do not match the data collection dates on slide 49. The correct dates are not given. The specific date for sample point 37 - Station Road - is not given. This is missing from the appendix. For most sites, but not all, up to seven days of pre-implementation analysis was conducted (including one weekend), but for post-implementation there was 13 days analysis (including two weekends). However, how this has been accounted for in the average weekly data figures is not explained. In addition, the differences between the post-implementation survey data from week one and week two have not been reported because only one week's data have been used.

The report fails to provide daily data for both north and southbound traffic flows for each data point to illustrate any irregularities in the data e.g. spikes.

Pedestrian assessments: There was only 3 days of pedestrian assessment carried out across 3 sites (i.e. 1 day per site). This is an extremely small sample and would not be sufficient to form a robust basis for decision-making. No dates/months/days of week have been provided for either the pre- or post-implementation analysis, so it is unclear whether survey dates are comparable. There is no information about where the video cameras counting the pedestrians were located or even if they were situated in the exact same locations for both the pre- and post-implementation analysis.

The report does not explain how family groups were recorded e.g. how were children that are
carried or pushed in push chars are counted and whether this was done consistently. Furthermore, the report does not describe whether the video data was analysed by a computer program or human assessment, and what quality controls were put in place.

The report fails to provide any benchmark analysis to show how pedestrian activity
changed in areas away from the LTN, therefore it is impossible to tell if changes in data were caused by the LTN or because of other factors, such as the pandemic (e.g. working from home), the weather, the petrol crisis, school streets, other LTNs etc.

Cycling analysis: How groups of cyclists are recorded is not explained. Whether the dates and locations that were used were the same as for the vehicle survey is not stated in the report, and data is not available for some of the key locations. For example, it is unclear why Station Road appears to have disappeared.

The report fails to sufficiently explain the weighting factor applied in the sensitivity testing. The pre-implementation analysis should have been shown in the first column, and then weighted data shown in the second column (i.e. the change in pre-and post-implementation data recorded at the benchmarking sites). This would have shown what the difference could have been without the impact of the LTN. Then the post-implementation analysis results would be shown in a third column and compared to the weighted pre-implementation analysis. Any differences could then be more fairly attributed to the implementation of the LTN (notwithstanding the issues that could be attributed to relevance of benchmarking sites).

The report therefore fails to provide the in-depth, detailed benchmarking data for the three sites for vehicles and cycling to assess the general trends versus the impact of the implementation of the LTN.

Officer response

The dates on slide 5 indicate the dates when the majority of sites were surveyed, with the individual dates for each site included in the Appendix. The dates for Station Road are included in the updated report issued with the Addendum.

No average weekly data has been reported. 24-hour, AM peak and PM peak flows reported are based on weekdays with the weekend data removed, to show the busiest periods. The effects of fuel shortage crisis have been removed from the data. It is not considered critical that there might be slight differences in the number of days' data between pre and post-implementation monitoring surveys, from which the weekday average has been determined.

Reporting two-way flows was considered sufficient to determine any spikes in recorded data.

One of the key aims of the monitoring was to understand the likely impact of the scheme on motor traffic volumes through the study area on a street-by-street basis. 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 pedestrian surveys were undertaken on 28th July 2020 and 20th July 2021, and therefore the COVID pandemic may have had an impact on pedestrian movements. The pedestrian surveys were a manual count from videos and recorded the total volume of pedestrians and not the grouping or type of pedestrian, which is not normally assessed as part of this form of monitoring exercise. A benchmarking

exercise is not necessary to appreciate that there could be a variety of external factors affecting pedestrian volumes at any given location. Pedestrian volume analysis has been used to demonstrate potential trends.

The cycle flows were recorded using the same ATC survey data as the traffic flows, Station Road is included in the updated report issued with the Addendum. These surveys only provide cycle volumes and not a breakdown of groups, which is not normally assessed as part of this form of monitoring exercise.

The bench marking exercise is described as part of the sensitivity test within the Appendix of the report. The survey data is reported in the main body of the report and then numbers can be compared to the sensitivity test to understand how the benchmarking has affected the traffic flows on each road. The formatting of the presentation of the results does not affect the outcome and conclusions.

Reason for call-in

There is biased and inconsistent interpretation and reliance on opinions

The data has not been interpreted consistently or evenhandedly. For example, the conclusions state that the *"increases on roads such as Highworth Road, Natal Road, Sidney Road, Spencer Avenue, Nightingale Road and Marquis Road are, on average, less than an additional vehicle per minute and are not likely to be noticeable or have a significant impact"*. However, some of these increases e.g. Nightingale Road (+ 739) and Spencer Avenue (+689) are far higher than decreases recorded elsewhere, yet decreases are not marked out as being either insignificant or not noticeable.

Furthermore, the mitigation measures suggested, based on Haringey Council's decision to
implement a potential LTN, is not evidence-based, but supposition, given it is not clear at this stage as to whether they intend to introduce such a scheme on a temporary or permanent basis.

According to the data provided, the reductions in traffic on the ladder of roads directly linking the LTN to Green Lanes i.e. between Sidney Avenue to the north and Nightingale Road to the south, are outweighed by the increases in traffic on other roads within the same area that directly link the LTN to Green Lanes. i.e. the decrease in traffic for link roads to Green Lanes (Sidney Avenue, Melbourne Avenue, Belsize Avenue and Sidney Road) is 851, whereas the increase on link roads between the LTN and Green Lanes (Spencer Avenue, Myddelton Road, Truro Road and Nightingale Road) is 1,718. Palmerston Road is excluded as it is not a direct link road to Green Lanes and to include it would double count vehicles i.e. the vehicle is counted on Palmerston Road and at least one other counter.

In other words what is happening is the traffic has just shifted from the northerly streets linking the LTN to Green Lanes, to other roads further south. It has not

reduced overall.

The reductions in traffic along Green Lanes and Bounds Green Road could reasonably be
explained by the location of fuel/service stations on these roads i.e. southbound blockages on
Green Lanes caused by the Shell Service Station and westbound blockages on Bounds Green Road caused by the Applegreen Service Station. However, this too was not mentioned in the report.

Some significant changes, i.e. on Green Lanes, Powys Lane, and Wilmer Way, can be better
explained by sampling issues rather than due to the implementation of the LTN e.g. the impact of the petrol crisis on cars flowing southbound along green lanes (due to blockages caused by queues at the Shell Garage further along Green Lanes), using pre-pandemic data for some pre-implementation analysis, using data from a single day (i.e. a Friday), and missing data from certain key roads impacted by the LTN.

The report therefore fails to provide consistent or evenhanded data and instead relies on opinions.

Officer response

One of the key objectives of the QN project was to 'significantly reduce the volume of through motor traffic on minor roads within the project area'. Those reductions have taken place within the extent of the implemented mitigation measures. Haringey Council agreed to implement the Bounds Green LTN under an experimental order at a Cabinet Meeting on the 7th December.

It is recognised that a degree of traffic reassignment between routes to the north and routes to the south is likely to have occurred as a consequence of the scheme. Enfield officers have worked closely with Haringey officers in the development of the Bounds Green LTN to ensure suitable mitigation is included for roads such as Nightingale Road and Spencer Avenue, which have seen the highest increases outside the extent of the implemented measures. The Bounds Green LTN aims to deliver an area wide solution. Post-implementation monitoring will be carried out as part of the Haringey LTN and if this shows traffic flows remain high on specific roads, further mitigation would be considered.

Data affected by the fuel shortage crisis has not been included and therefore does not affect the reported values for Green Lanes and Bounds Green Road and the report seeks to assess the impact of the COVID pandemic within the sensitivity test. The dates for Wilmer Way and Powys Lane were included in the updated report issued with the Addendum with 4 days of data available. For this reason, it is not accepted that sampling issues have affected the analysis results.

Reason for call-in

The report fails to explain how it will mitigate the key objectives of Council's Corporate Plan undermined by the implementation of the LTN

(1) Good homes in well-connected neighbourhoods: By blocking off roads and reducing access for people who are required to make essential medium to long distance car journeys, for health or work-related reasons, **the LTN disconnects rather than creates well connected neighbourhoods, but no mitigation measures are documented in the report.**

(2) Sustain strong and healthy communities: By dispersing traffic and pollution onto adjacent and boundary roads is harmful to residents living and working there and **the LTN undermines the objective of sustaining strong and healthy communities, but no mitigation measures are documented in the report.**

(3) Build our local economy to create a thriving place: No evidence has been provided to demonstrate how the LTN will not detrimentally impact hourly-paid workers, care workers, gardeners, carers, delivery drivers, or businesses, which are required to make multiple daily medium distant journeys (e.g. estate agents). **The LTN will work against the objective to build our local economy to create a thriving place, but no mitigation measures are documented in the report.**

Officer response

The report takes a different view of how the project aligns with the Council's Corporate Plan, as set out in para 11, 12 and 13 of the report:

"11.Good homes in well-connected neighbourhoods. This project supports the Council's commitment to encourage people to walk and cycle, which improve connectivity of neighbourhoods.

12.Sustain strong and healthy communities. The project, and the underlying Enfield Healthy Streets Framework, seeks to create healthier streets. This approach puts people and their health at the heart of decision making. It is a long-term plan for improving the user experience of streets, enabling everyone to be more active and enjoy the subsequent health benefits.

13.Build our local economy to create a thriving place. Wider investment in the walking & cycling network forms part of the Council's strategy to support our high streets and town centres by providing safe and convenient access to local shops and services."