

OBJECTIONS, RESIDENTS CONCERNS AND OFFICER RESPONSES

1. Overriding conclusions of a recent engagement report (Living Streets, October 2021) which showed most residents opposed road closures in Queen's Park, primarily because of knock-on effects on areas shown by available evidence already to be suffering from substantially worse congestion, air quality & safety.

Officer's response

In page 40 of the Living Streets Engagement report, it highlights the concern raised by residents regarding external traffic being restricted to main roads rather than being permitted to use side roads. This issue is clearly a source of worry for respondents. However, the report notes that many of those voicing these concerns are not directly affected by the current through-traffic challenges. Conversely, residents who do experience the impact of through-traffic tend to support measures to address the problem, including the use of physical filters, ANPR cameras, timed restrictions, and School Street initiatives.

In summary, the report concludes that residents on side roads who are impacted by through-traffic largely favour measures to reduce it, while those not currently affected express concerns about the potential consequences of redirecting traffic to main roads. Importantly, the report does not discourage the Council from investigating future traffic issues should they arise in specific areas.

The traffic management scheme introduced to restrict traffic between 7-10am, Monday to Friday, on the Avenues adjacent to Kingswood Avenue, was implemented in response to complaints about congestion, through-traffic, and road safety concerns during morning peak hours—aligning with the conclusions of the report. Analysis of traffic data collected before and after the scheme confirms that traffic volume has reduced in the Avenues including Kingswood Avenue and Chevening Road, no significant impact on road safety in neighbouring streets, significant drop in air pollution levels in the area (including on Salusbury Road), and no major disruption to traffic on surrounding roads.

Finally, while initial concerns about displaced traffic are understandable, research on similar schemes reveals the phenomenon known as "traffic evaporation." This occurs as individuals adopt alternative routes or transition to different modes of transport, ultimately reducing overall car trips. Furthermore, motorists that need to travel by car do not wish to sit in traffic and often change the time at which they travel. Over time, this effect eases pressure on boundary roads, delivering benefits not only to residents within the scheme but also to the wider community.

Professor Rachel Aldred, University of Westminster, published a report in January 2023 which shows that similar schemes have substantial benefits inside their boundaries and contribute to wider traffic reduction goals. The report is available via the FAQs (Is there any data to show that Healthy Neighbourhoods reduce traffic within the project area) on the councils website; <https://www.brent.gov.uk/parking-roads-and-travel/travel-and-transport/brent-healthy-neighbourhoods/queens-park-healthy-neighbourhood>

2. Prioritising the hyper-local concerns and convenience of a small group of residents to the detriment of far greater numbers of stakeholders (including thousands of schoolchildren) suffering from displaced traffic on boundary roads and surrounding streets.

Officer's response

In summary, the traffic management scheme in the Avenues is designed not to prioritise one group over another, but rather to create a balanced and sustainable urban environment that meets the long-term needs of all stakeholders, including schoolchildren and residents impacted by traffic. By reducing car dependency and fostering safer streets, this initiative offers an opportunity for communities to flourish collectively. The key benefits of the scheme include:

- Discouraging through traffic in residential areas, which helps lower vehicle emissions, improve air quality, and promote healthier living conditions and lifestyles—especially crucial for children, who are particularly vulnerable to pollution.*
- Facilitating safer routes for schoolchildren, encouraging families to consider alternatives to car-based commutes, thereby alleviating traffic pressures on boundary roads and surrounding streets.*
- Addressing initial concerns about displaced traffic with research indicating a phenomenon known as "traffic evaporation." This process sees a reduction in overall car trips as individuals shift to alternative routes or modes of transport.*
- Generating positive ripple effects that extend far beyond the immediate area. Safer streets support more vibrant local economies, foster stronger social connections, and nurture a sense of community, enhancing the overall well-being of the area.*

This scheme represents a thoughtful step toward creating a more inclusive and sustainable urban landscape.

3. Attempting a deeply flawed consultation as justification for implementing the initial experiment, limited only to beneficiary streets, contradicting guidance from Brent's own traffic engineer that the trial measures should be subject to "extensive engagement/consultation".

Officer's response

Decisions on schemes such as the traffic management initiative in the Avenues often begin with consultations concentrated on the specific areas where the changes are proposed. This targeted approach focuses on addressing immediate concerns, such as reducing through-traffic and improving air quality for local residents.

In this case, although the scheme was introduced using Experimental Traffic Management Orders (ETOs), which do not require public consultation before the trial begins, it is important to highlight that the council engaged with the public—particularly affected residents—prior to implementation. Initially, the scheme was launched in the Avenues where support for the proposals was evident, and it was later expanded into neighbouring streets in response to further requests from residents.

Since the trial commenced, numerous opportunities have been provided for the public to share their feedback on the scheme, including during community engagement. This has included objections, trial-specific feedback, emails and petitions sent to the Council. All feedback received to date has been carefully reviewed and considered in shaping the decision-making process.

4. Excluding an overwhelming majority of impacted stakeholders even after being forced to expand the initial consultation (slightly) because of numerous complaints, and then ignoring the central demand of 187 petitioners (vs 129 voting in favour in the consultation) to defer the proposals and first assess wider impacts.

The Council's decision to proceed with the proposals was to address a petition from residents who were experiencing severe traffic congestion in narrow residential streets. This was on an

experimental basis so the wider impact of the scheme could be considered objectively through monitoring and a decision could be made on whether to make the restrictions permanent, remove the restrictions, or consider alternative measures. During the public consultation, 90% of respondents from Dudley Avenue, Hopefield Avenue, Montrose Avenue, and Summerfield Avenue voiced strong support for the proposals. On the other hand, feedback from other Avenues, including those represented by petition, opposed the trial scheme. As a result, the scheme was first implemented in the Avenues that demonstrated strong support and subsequently extended at the request of residents in neighbouring streets. This pragmatic approach highlights the Council's commitment in progressing trial schemes to address residents concerns.

The use of Experimental Traffic Regulation Orders (ETROs) demonstrates the Council's balanced and thoughtful approach. Implementing the scheme through ETROs allowed for an 18-month trial period, ensuring flexibility and transparency. This mechanism enabled continuous monitoring, the collection of feedback, and the opportunity to address unforeseen challenges. By adopting this approach, it has to be said that the Council respected the support of residents in the affected Avenues while also creating room to evaluate the wider impacts during the trial period. It demonstrates a measured and inclusive method of decision-making that seeks to balance differing perspectives fairly.

5. Failure to address serious questions of integrity and transparency in respect of ward councillors' roles, including numerous public denials that they played any part in the decision making process, which appears to contradict the official record and email correspondence released pursuant to FOI requests.

Officer's response

Firstly, it is important to recognize the fundamental role of councillors in representing the interests and concerns of their constituents. This responsibility includes engaging with public, voicing community concerns, and ensuring transparency in all processes affecting their wards. However, the role of councillors in this context does not inherently equate to direct involvement in executive decision-making. . Understandably ward councillors would have an interest in ensuring local concerns are addressed by officers and provide a useful insight into those issues, but it is incorrect to suggest that ward councillors unfairly influenced the specific decisions regarding the scheme's implementation. This decision was made by officers taking into consideration residents' concerns, observations and supporting data. The official record and email correspondence released through FOI requests provide context, and do not support claims of undue influence by councillors.

6. Inadequately addressed concerns regarding standards of conduct and apparent conflicts of interest in relation to one ward councillor who resides in a beneficiary street and appears to have attempted to exert influence on the scope of the initial consultation.

Officer's response

Councillors, as residents of their respective communities, will often live in streets where there are plans for infrastructure improvements and they are entitled to express concerns or provide input on proposals that directly impact the areas in which they live. In this instance, there was no conflict of interest, as the councillor acted within their rights as a resident without compromising their impartiality or public duty.

The councillor's actions were in alignment with the principles of transparency and accountability. The concerns about any attempt to influence the scope of the initial consultation have been carefully reviewed and found to be unsubstantiated. As such, no breach of standards of conduct has been identified.

7. Failure to collect necessary or consistent “before” and “ongoing” data sets in accordance with the scheme monitoring plan set out in the Report (e.g. Appendix F)

Officer’s response

The collection of necessary and consistent “before” and “ongoing” data sets is crucial for ensuring the effectiveness of the scheme monitoring plan. As such as part of the monitoring plan, officers have been actively collecting data on traffic volume, vehicle speed, ANPR CCTV enforcement, air pollution levels, and feedback from residents to ensure the scheme is effectively and fairly evaluated. As such, officers do not agree that there is any procedural failure in this instance

8. Failure to review the scheme after 6 months in accordance with the initial decision authorising the trial measures.

Officer’s response

Experimental Traffic Management Order (ETRO) can typically be reviewed at any time during its experimental period, which often spans up to 18 months. As such, there is no procedural failure in this instance. While the scheme's initial decision authorising the trial measures may have suggested a review after 6 months, the flexibility inherent in the ETRO process ensures that reviews are not strictly limited to this timeframe, allowing for adjustments or evaluations as deemed appropriate during the experimental period.

9. Introducing a second ETO scheme (in the upper avenues) on top of the original one (in the lower avenues) rendering impossible an objective evaluation of the original scheme’s independent impact.

Officer’s response

Comparison of traffic data collected in November 2023, following the extension of the scheme to the upper Avenues, with traffic data collected in September 2022, prior to the scheme's implementation, reveals a reduction in traffic volumes during the 7-10am period. This reduction indicates that some objectives of the trial have been successfully achieved.

Introducing a second Experimental Traffic Order (ETO) scheme in the upper Avenues, alongside the original scheme in the lower Avenues, did not compromise the evaluation of the original scheme or its independent impacts. Both schemes have been assessed thoroughly, and the results support the effectiveness of the measures implemented.

10. Failure to make available for public scrutiny analysis or interpretation of scheme monitoring data in a timely manner and/or adequate format to enable informed consent.

Officer’s response

The claim that there has been a failure to make available for public scrutiny the analysis or interpretation of scheme monitoring data in a timely and/or adequate format is not correct. When a written objection or correspondence which includes a request for further clarification around the details of the scheme is received, officers endeavour to respond to the enquiry within 10 working days.

Additionally, the public has a general right of access to information held by the council. During the experimental period numerous requests were received for information and data and responded to under both the Freedom of Information Act and Environmental Information

Regulations by officers. The council is obligated to release information upon request unless a relevant exemption applies. Officers adhere strictly to the council's commitments to fostering a culture of openness, transparency, and accountability.

11. Against the backdrop of a general lack of transparency, failure to present clear and objective success criteria against which the success of the trial measures will be evaluated.

Officer's response

A scheme monitoring plan was made available and parameters identified to evaluate the scheme. These criteria have been detailed in the monitoring plan, which can be found in the previous report on the scheme (Appendix F). Specifically, the scheme's outcomes have been assessed based on:

- Reduction in traffic volume and speed.*
- Decrease in air pollution levels.*
- Compliance levels with ANPR enforcement mechanisms.*
- Absence of significant disruptions to neighbouring roads.*
- Impact on emergency services and police response times.*
- Feedback from the local community.*

These metrics provide a comprehensive and objective framework to gauge the trial's effectiveness, ensuring both transparency and accountability in the evaluation process.

12. The traffic management scheme has failed to improve traffic flow, failed to improve journey times and reliability, failed to improve air quality and reduce carbon emissions. The resident asks to address the concerns of the long-suffering residents of Harvist Road and lower Kingswood Avenue.

Officer's response

We understand that the benefits of such traffic management scheme may not always be immediately apparent after its implementation. However, the most recent data indicates that the scheme has successfully reduced through traffic, which was one of its primary objectives. Furthermore, there were extensive major roadworks in the area at the time, including the Kensal Corridor Public Realm Improvement scheme, along with major utility works, both of which would have increased traffic congestion in the area.

The Council is also aware of the challenges that remain at Harvist Road arm of the signal junction outside the Queens Park Tube Station. To address this issue, the Council is actively reviewing the signal junction at Harvist Road /Salisbury Road/ Brondesbury Road with the view to optimising its performance.

13. We consider that Blue Badge holders and residents of the Avenues be exempt from PCNs.

Officer's response

Blue Badge holders and residents of the Avenues are not exempt from the traffic management scheme because of its overarching objectives and that there is no provision for exemptions for banned turn restrictions under traffic regulations. The scheme is designed to reduce through-traffic, enhance air quality, and encourage sustainable transport modes such as walking and

cycling. Furthermore, it is not feasible to grant exemptions for Blue Badge holders as these could not be identified through CCTV camera footage. As with other traffic restrictions, Blue badge holders therefore need to use other available routes.

14. Is there a way of reducing the 7-10am limit – surely 7.30 to 9.30am would suffice or even to 9am. And it is very exasperating not to be able to go that way in school holidays (3 months a year)

Officer's response

Although school traffic does have a significant impact on traffic volumes, the scheme is not designed as a School Street Zone and the trial restrictions were introduced to manage traffic flow during peak hours. The current restricted times, from 7:00 AM to 10:00 AM, were established to address morning traffic congestion effectively. The suggestion about revising the restricted hours to better align with community needs has been considered. As part of our ongoing review of the scheme, the restricted hours have been carefully considered, along with adjustments to optimise the balance between traffic management and residents' convenience.

15. Salusbury road is very congested nowadays, lots of lorries, skip vans and double parking doesn't help. Anything you can do to support that would be very welcome.

Officer's response

The Council is aware of the challenges with traffic congestion on Salusbury Road and we are actively exploring solutions to ease congestion. As part of our efforts, we are planning to review the parking restrictions on Salusbury Road to ensure they support better traffic flow and accessibility for all road users.

Additionally, the Council is currently working on making improvements at the signal junction outside Queen's Park Station. Once implemented, these upgrades will aim to enhance traffic flow and alleviate some of the congestion in the area.

16. While we welcome and support that aspiration, the trial measures on the streets connecting Kingswood Avenue and Salusbury Road are diverting traffic unhelpfully, adversely impacting the broader community, and together with the new proposals developed by MP Smarter Travel, raise serious concerns regarding:

- Health and safety risks from displaced traffic increasing congestion and pollution within the project zone and on already dangerous and busy boundary roads, including Salusbury and Chamberlayne where thousands of children attend school.

Officer's response – please refer to the response to point 1.

- Failure to consider any impact on adjacent areas like Brondesbury Park, Kensal Rise and North Kilburn, and neglect of vulnerable populations such as the elderly, disabled, and families who cannot rely solely on walking or cycling.

Officer's response – *The traffic management scheme was introduced to restrict peak-hour morning traffic, aiming to reduce congestion and encourage safer, more sustainable travel. Recent data shows there is no major disruption to neighbouring areas, such as Brondesbury Park, Kensal Rise and North Kilburn. Residents who live within the restricted Avenues have reported improved quality of life due to*

reduced traffic, enhanced safety, and better air quality. The Council remains attentive to the needs of vulnerable groups and is committed to monitoring the scheme's impact to address any challenges.

- Unfair prioritisation of select streets at the expense of surrounding areas, imposed without broad community support, based on flawed engagement and inadequate impact assessment, exacerbating inequality and division.

Officer's response – *please refer to responses to points 1 and 3.*

- Unnecessary harm and disruption to residents and businesses in Queen's Park and surrounding areas from restricted access.

Officer's response – *please refer to the response to point 2.*