

January 2022

Dear Cllr Muhammed Butt

We are writing to express our extreme frustration at the entire process of how many of the active travel trials, especially the Healthy Neighbourhood schemes, have been conducted.

As council leader, you bear ultimate responsibility for their failure, as well as total failure to implement adopted Brent Council policies and follow guidance from the Department for Transport (DfT) and Transport for London (TfL).

We have numerous concerns detailed below

1. Initial consultation

Brent successfully bid for emergency active travel funds and was awarded £351 976 for 9 Low Traffic Neighbourhoods in July 2020. These measures were detailed in the council's Draft Brent Covid-19 Transport Recovery plan which was published in June 2020 and consulted on until August 2020. Letters were also sent to 12,296 residents.

Why did the council fail to regularly communicate about this? Why wasn't the pressing need, overall objectives and process as mandated by the Department for Transport and TfL explain to residents and more worryingly, to Councillors?

Why didn't you step in to clarify what was happening when some councillors tried to undermine the entire process from the start (calling for petitions and openly calling for removing them early on), resulting in totally incoherent messaging from Brent. However, for councillors to falsely claim that they were not consulted is patently false.

Where are the results of the online consultation on the Draft Brent Covid-19 Transport Recovery plan? Where are the results of the Common Place engagement platform that ran from the June 2020 until July 2021?

Please note that as of Sunday 4 July Brent Council will stop using Commonplace to record responses. We will be moving to a new site – [CitizenLab](#), which is currently under development.

All the comments that have been provided on Commonplace have been saved and are being used by various teams within Brent Council to help manage existing trials and schemes, as well as feed into any future projects and programmes.

2. LTN designs

The initial designs were extremely poor, leaving rat-runs through the LTNs, completely disregarding established, evidence-based principles behind LTNs designs. We appreciate that these were trials. We were not expecting perfect from day 1 and designs could be tweaked, but our feedback on this was repeatedly ignored, leaving in place not only schemes ineffective but also creating new issues.

Why didn't you instruct your officers to design them according to widely available good practice?

3. Trial implementation

On 16th October 2020 an Extraordinary full council meeting was held and a decision was passed to proceed with the trials from November with increased engagement. Sadly, none of the schemes were ever properly implemented (slow drip) and for the duration of the trial, for example:

- a. Many planters were either moved or left with spaces wide enough for cars to pass through; some signs were still bagged months into the trials,
- b. The engagement only started at the end of July 2021, that's 9 months after promise to do so at the Extraordinary council meeting.
- c. Traffic orders were never enforced, either with physical barriers or ANPR cameras, except for a couple of weeks in some of the schemes.
- d. There was frequent vandalism that was not addressed.
- e. Schemes were paused twice during the trials and never properly restarted despite the health crisis improving
- f. Residents were informed by councillors that they could ignore and that schemes would not be enforced. This is clearly extremely dangerous as a cyclist could pass through a filtered junction whilst being completely misled that it was safe.

Why is Brent Council claiming that these LTNs were trialled or implemented? This is patently false rendering the results of the trial almost meaningless.

4. Emergency services

In January 2021 we understand that London Ambulance Service (LAS) raised concerns regarding some of the bollards due to the 2nd wave of the pandemic, so they were removed. Why were these not re-instated once the urgency had passed for the duration of the ETOs/trial, given the general support for the schemes from the LAS? Residents received a letter in February indicating ANPR cameras were purchased with funding from TfL. Why were not they installed then?

Why couldn't Brent Council overcome the challenges other boroughs clearly could?

5. Interim monitoring

Where are the interim reports? The results of incremental feedback have not been properly published or implemented at any point of the trials. For example, we have no evidence of date stamps or unique response markers, despite being told that residents could respond multiple times during the trial and consultations ran through times where nothing was implemented, or partial implementation.

Why didn't the Council make full use of the experimental character of the traffic orders? Residents were told the process would be: assess, evaluate, correct. repeat.

We are committed to ongoing community engagement throughout the trial period and want to continue to work with the community to develop a scheme that will make your area greener, safer, healthier and more pleasant. We will be listening to all suggestions and ideas which are made, providing update letters and arranging monthly meetings with local residents, details of which will be made available on our website;

6. Data collection

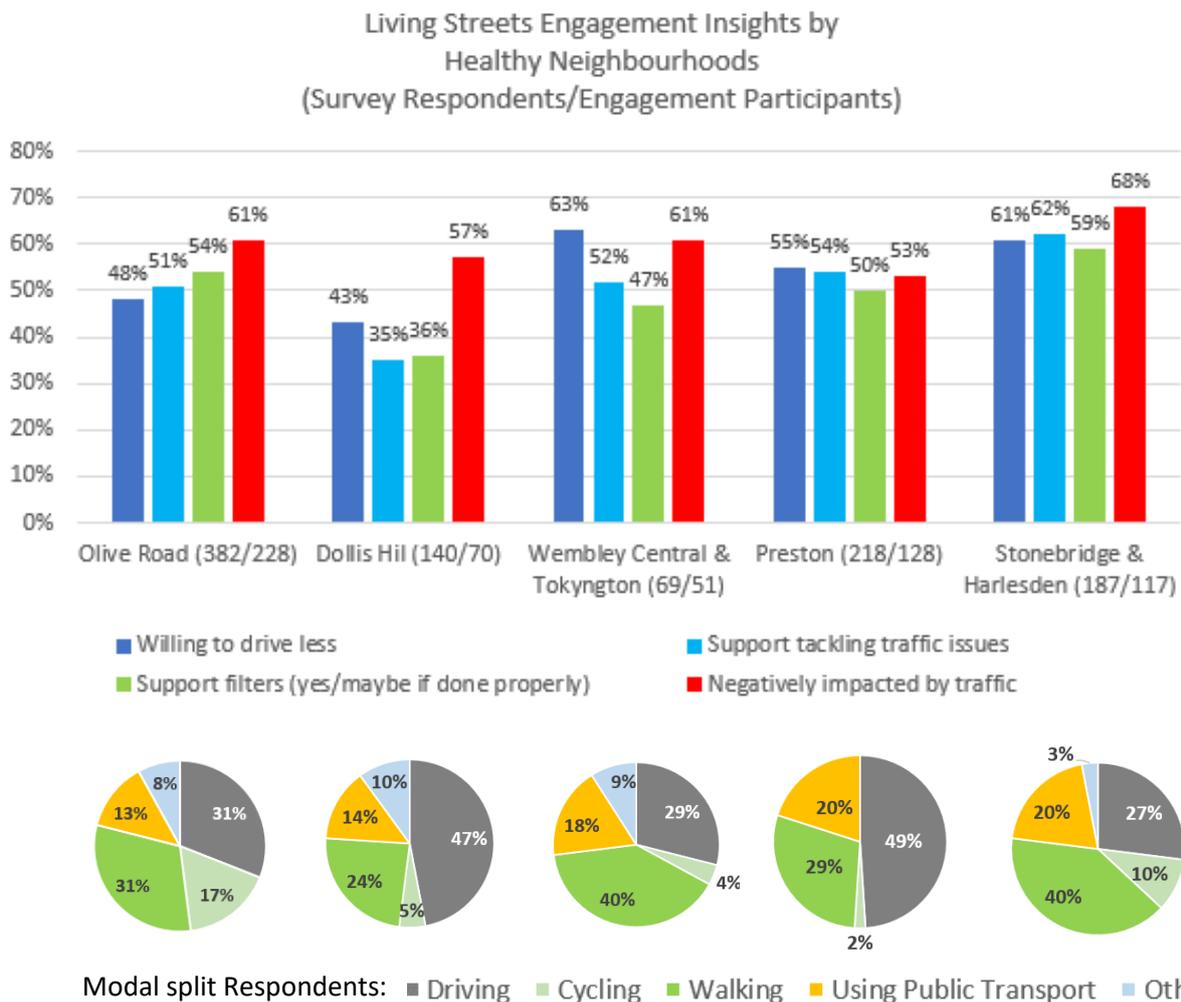
Although traffic counts for motor vehicles, buses, collision and air quality data have been recorded in the monitoring reports, there is hardly any evidence of walking and cycling data, which is perplexing as these are **Active Travel** schemes. Emergency response times have also not been published.

Why, since the decision to remove the schemes is solely based on these reports?

7. Living Streets

The Living Streets (LS) carried out engagement during the summer 2021 (for less than 3 months). The reports are insightful, showing an overall support for traffic reduction, trialling schemes and a willingness to change driving habits. However, Brent has made significant errors with this:

- Many residents did not appear to have received letters informing them about the process.
- Online meeting links were not shared in a timely manner by Brent, so residents may have missed them.
- It appears that there is no mention of either their suggestions or engagement results in the officer's report. Why is that?



8. Scheme removals decision/Consultation results

The decision to remove the schemes appears to be based upon a vote/referendum of responses, rather than meaningful evaluation (for instance, including respondents' main mode of transport). This is a highly relevant attribute when consulting over traffic issues and transport).

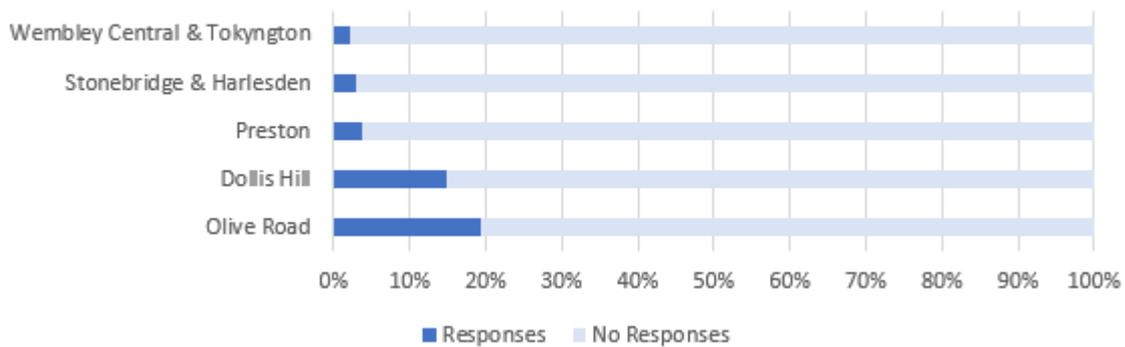
- This goes completely against the latest DfT advice as expressed in the: "Traffic Management Act 2004: network management to support recovery from COVID-19 – Updated 30 July 2021: "Consultations are not referendums,

“Polling results should be one part of the suite of robust, empirical evidence on which decisions are made.”

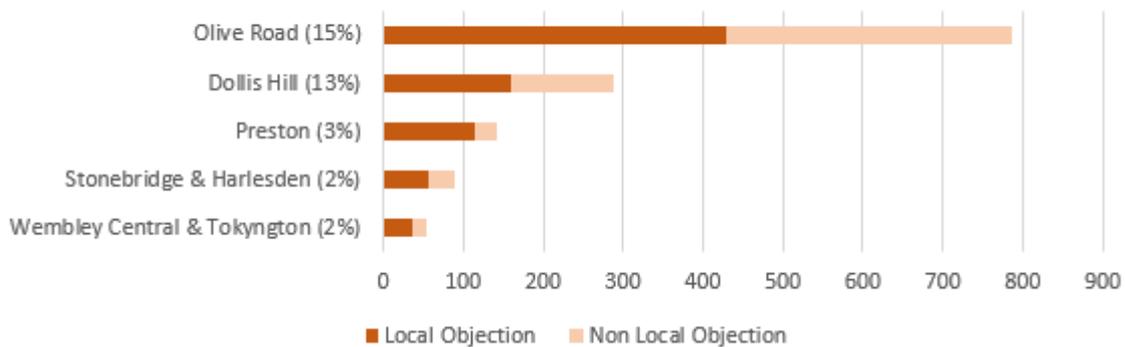
Why has this been ignored and what happened to *“Engagement is part of the process, and we need the robustness behind, to make sure we do not fall foul of processes.”* (you in September 2021).

- b. In all areas, only a small proportion of those consulted actually objected. The vast majority of consultees (ranging in between 80%-98%). did not even respond. The Council’s own reports also demonstrate that the opposition to schemes has been grossly exaggerated as they ranged from 2% to 15% of people consulted on the schemes.

Response Rate: Did People Really Feel Strongly About This?



Number of Objections (Objection Rate in %) by Scheme



- c. As mentioned above, the Living Streets reports showed good support for traffic reduction and trialling of schemes. Why is this more recent data largely ignored in the officer’s recommendations?

9. Future funding

As schemes look set to be removed without alternatives in place, Brent is in serious jeopardy, like other boroughs, of losing future funding for road maintenance. How is this going to help with the £100 million you said you needed for it? This will have a massive impact on local transport, pollution, and climate change, disadvantaging everyone, but especially those who do not have access to a car (approximately 50% of Brent households). The current TfL funding crisis will limit future funds, and Brent is unlikely to receive much as the ambition it has shown over the last 18 months is woeful.

10. Other boroughs

Many other councils have faced the same challenges during the pandemic, but managed to implement successful trials, many of which are now being made permanent. Councillors keep insisting that Brent is unique, however this is false, and has faced many of the same challenges as other outer London boroughs. Councillors should stop making excuses and simply get on with installing high quality active travel schemes as per adopted several council policies.

11. Mayor of London's stark warnings

This week, Sadiq Khan has warned on multiple occasions that London is in danger of being gridlocked and suffering a public health crisis due to excess volumes of motor traffic. A significant shift to active travel and public transport is essential, and it is extremely worrying that Brent is completely failing in the implementation of LTNs.

In September 2021, you said: "*Commitment from us is there, to make sure cycling and walking are encouraged in the borough. The conversation around LTN and school streets are right on the agenda. [...] We are not shying away we are just making sure we are absolutely right.*" After 18 months and plenty of examples elsewhere in London, how much longer do you need to learn how this works?

12. Air quality alerts

On 13th and 14th January London had high level warnings about air quality, advising against strenuous exercise outdoors, especially for those with breathing difficulties. Brent has some of the most polluted roads in London and a failure to shift to more sustainable transport is a huge concern with this latest episode.



13. Inappropriate conduct

We received reports that some councillors were targeted with face-to-face abuse over these schemes. This is completely unacceptable, but sadly has occurred in many councils implementing active travel schemes. We hope that Brent has reported this to the police and those guilty are brought to justice. However, this must

not deter efforts to improve active travel and deter car dominance in Brent. And should be publicly challenged.

In September 2021, you claimed, "*The political will is there, and we have a thick skin*".

What happened?

Kind regards
Brent Cycling Campaign