

BLOOMSBURY RESIDENTS' ACTION GROUP

PROOF OF EVIDENCE 13

Commentary on the Council's Statement of Case

SUMMARY

NICKY COATES

A. Introduction

1. Some headline comments on the Council's Statement of Case (SoC) were made in BRAG's SoC. This document expands on that.
2. In broad terms, the Council's SoC is largely made up of generalised statements lifted from policy documents, with aspirational references made to improvements in the environment, the economy, public health, better air quality etc. These are referenced in such a way as to give the impression that, through the trial, the Council is working towards these benefits; and in some cases the wording implies, or even directly states that these benefits have been achieved. However, many statements are unsubstantiated; and some are stated in spite of contrary evidence.
3. This document highlights the Council's admission that the trial has increased pollution for residents in some areas, and been detrimental to people with disabilities, and the fact that, in spite of this, Council's seems determined to make the scheme permanent and disregard these impacts on local people. The Council justifies making health conditions and quality of life worse for some on the grounds that '*... the overall benefits from the scheme outweigh some localised negatives.*' (SoC 9.5). The benefits the scheme was intended to achieve were better air quality and safety in the area, and the Council has proved neither. So, the 'overall benefits' are unproven; and yet this trial, which has not met its objectives justifies, in the Council's view, the detriment it causes.
4. This summary makes brief reference to some of the many points that are challenged by BRAG.

B. Points that are challenged by BRAG

1. **SoC 4.2 states:** '*The previous road layout with a two-way protected cycle track and a traffic lane in each direction also did not provide a safe and attractive environment for the large number of people walking in the area. There are areas where the current footway is very narrow and not comfortable for the numbers of pedestrians.*' This subjective, unsubstantiated and emotive statement about what is attractive and comfortable does not reflect the experience or perceptions of [any] local people known to BRAG.
2. **SoC 4.2 states:** '*The route also suffered from a poor collision record, relating to collisions between motor vehicles and both cyclists and pedestrians.*' This is an unsubstantiated statement, shown to be so in BRAG's Proof of Evidence (PoE) 5.

3. **In SoC 5.2**, these generalised references to policy documents include the statement: *'These set out the health, economic and environmental benefits of more cycling and walking, (including better air quality)'* By quoting these documents, the Council seeks to give the impression that, through the trial, it is working towards these benefits; or may even be trying to imply (and indeed may believe it has) achieved them. Whereas in fact the Council provide no evidence for health, economic and environmental benefits – including air quality - for the area.
4. **SoC 5.19** states: *'Alterations to the existing layout have resulted in improvements that not only improve the experience of existing users...'* The trial is spoken of as 'an improvement' as if this were fact. It is a change, not an improvement, unless proved to be so. There is no evidence that it has constituted an improvement on the Council's key criteria of safety and pollution. (See PoEs 4 and 5).
5. **SoC 5.19** states: *'By providing more cycling capacity on the Corridor, people will be better able to access local services.'* This only of course applies of course to cyclists, which make up roughly between 3% and 9% of the adult population (<http://www.cyclinguk.org/resources/cycling-uk-cycling-statistics#How many people cycle and how often?>). For the majority of the population, and especially disabled people or people who need vehicles for other reasons, it is more difficult to access local services.
6. **SoC 5.21** states: *'The Scheme meets two of the core objectives of the Camden Plan20 as it contributes to conditions for and harnessing the benefits of economic growth, and allows investing in our communities to ensure sustainable neighbourhoods.'* The claim for economic growth is challenged in paragraph (8) above. The claim the trial contributes to ensuring sustainable neighbourhoods is of concern: concern that the Council thinks it can claim this without evidence; and concern that the Council might be under the impression that it is actually doing this. Residents who have lived here for many years can recall no other Council intervention that has rocked the community so profoundly. It has led to many people saying they find it difficult to live here now, and that they fear it will get worse; to businesses saying it is difficult to operate here now (PoEs 4 and 10). There is huge local concern that these road changes which make everyday life more difficult and stressful will drive people out, and turn this into an area of short-term lets, with the loss of any sense of community. The Council's claim runs against the experience and perceptions of many local people; and the Council does not provide evidence in support of its claim.
7. **SoC 5.22** recognises: *'The redistribution of traffic has some negative impacts on certain streets but has had significant benefits on others particularly along the Corridor.'* This is true. It would be interesting to know how the Council deduces from this that the trial should be made permanent. Fewer people live on the corridor than in the surrounding streets - but maybe their health and quality of life is weighed as more important than those in surrounding streets -? Also to be taken into account is the fact that the traffic used to flow, mostly, on the corridor and surrounding streets; now this is replaced by one often empty street, and many streets with stop-start traffic. It would be interesting to know what statistical, scientific and ethical basis the Council used to weigh up the relative gains and losses and the relative rights to health and wellbeing in various streets. But the Council provides no rationale or explanation for this deduction.
8. **SoC 6**: The extensive and fundamental flaws in the consultation and information processes are explored fully in BRAG's PoEs 2 and 3

9. **SoC 7.12** again blithely condemns some residents to worse health conditions in the Council's zeal to keep the trial layout: *'While the majority of local roads do not reflect increases in air pollution that could be ascribed to the displacement of traffic from the Corridor [no evidence provided for this statement], there are exceptions, such as Endsleigh Gardens where displaced traffic may be adding to pollution levels. However it is considered that the improvements to air quality in the Corridor more than offset a reduction in air quality on a limited number of other local roads, especially given the increased numbers of pedestrians and cyclists benefiting from better air quality by using the Corridor.'*
10. It should be noted here that the Council refers above to the increased pollution being present in *'a limited number of other local roads'*, thereby seeking to belittle the extent of the adverse effect; but the Council does not know how many roads have worse air quality because it has not been measured.
11. **SoC 7.13** states: *'It should also be noted that through the enhanced cycling facilities and the promotion of modal shift away from private motor vehicles the total amount of traffic in the area is likely to have reduced.'* Saying the traffic is likely to have reduced does not mean it has. Again, by use of vague words the Council is seeking to give the impression that there is less traffic, without evidence.
12. The Council's insouciance about worsening air quality is repeated in **SoC 9.5**: *'Whilst there appears to have been some localised disbenefits in terms of air quality, the overall benefits from the scheme outweigh some localised negatives.'*
13. **SoC 7.17** refers to the Council's discrimination against disabled people, which is addressed in BRAG'S PoE 9. The complacent statement in **7.18** – *'The Equalities Impact Assessment concluded that the positive impacts of the Scheme upon groups with protected characteristics outweighed the negative impacts on those groups.'* – again arises the point made in paragraph 8 above: in making this value-judgement, the Council is applying its own unexplained and unjustified ethical basis to place some people as being more important than others.
14. **SoC 9.4** states: *'Whilst some traffic has inevitably displaced onto surrounding streets, the overall impact of traffic in the area is minimal as rather than local roads, the majority of traffic is diverted to more strategic roads, such as Euston Road and Gray's Inn Road'*. People within the Council might see the impact as minimal but residents who live with greater congestion and pollution would not agree. And this sentence also misses the point that traffic which finds it cannot go west down Tavistock Place does indeed have to divert to Euston Road; but to get to Euston Road, it has to pass through residential streets.