

**Richard Parnham's presentation to the OCC Cabinet Member for Highway Management meeting
On the subject of the Cowley LTN ANPR proposal
10am, 22 June 2023**

For months, me and others have been banging on about NO₂ pollution levels around Hollow Way and Oxford Road / Between Towns Road. We've been claiming that provisional NO₂ pollution data shows that, following the introduction of LTNs, pollution levels have gone up. In fact, we've been claiming that pollution levels on these roads went up by such large amounts in 2022 that average yearly legal limits (40.3 µg/ m³) were being breached for the first time. Previously, according to official City Council numbers, pollution limits on these roads were not being breached.

Why is this relevant to today's Cowley LTN ANPR decision? Simple: I've long argued that, because of this apparent pollution law breach, ANPR cameras should be off the table, as a tool for fixing local NO₂ pollution problems around Cowley. Instead, I think we should reopen the side roads around the area. Effectively, we can reduce the pollution problem in Cowley by putting things back exactly as they were – not by swapping roadblocks for ANPR cameras.

And you know what? I was right. The provisional City Council numbers for 2022 indicated that NO₂ pollution limits *were* being breached around Cowley. The provisional number on Hollow Way for 2022 was 45.7µg/m³ – up a stonking 24% from the official total of 37 µg/m³ in 2019, the Council's preferred pre-Covid benchmark year. Likewise, on Oxford Road / Between Towns Road, the provisional number for 2022 is now confirmed as being 40.3 µg/m³, a smidge over the legal limit. In 2019, the final number for this road was 32 µg/m³, some 26% lower.

So, has our side won? Are you going to remove the LTN barriers, based on what we've found? Of course not. Because, this year, it turns out that Oxford City Council's final pollution numbers are **way lower** than the provisional ones that we've been carefully collecting for an entire year. So, it seems, OCC can safely ignore these pollution concerns. Nothing to see here.

Now, here's a curious thing: in recent years, the City Council's final pollution numbers have typically been between 2-6 per cent lower than their provisional ones – a pretty inconsequential downward tweak. However, in 2022, the very year that comparative multi-year pollution data was crucial, Oxford City Council's final pollution numbers were "adjusted" down by a whopping 26%, compared with the provisional ones. Pollution "fell", not (necessarily) because the raw numbers fell, but because the final numbers were then reduced down by far more than in previous years, to produce the final – official – numbers.

As a result, the Hollow Way number tumbled from 45.7 µg/m³ to just 34 µg/m³ in the final analysis – a drop of 11.7, to the lowest number ever recorded. Oxford Road / Between Towns Road got a similar treatment, falling from 40.3 µg/m³ to 30 – a fall of 10.3 µg/m³. Impressive!

Now, these numbers are (apparently) "subject to review by DEFRA" – so they're possibly not completely "final-final". So I'm going to have a word with DEFRA, and see if it wants to review them. There's also another national government agency that I'll be contacting shortly, asking them to review the City Council's numbers.

So, perhaps, you shouldn't be so confident in dismissing these NO₂ pollution concerns right now, just in case the issue comes back to bite you.

Watch this space.