

Appendix A: Oval to Stockwell Low Traffic Neighbourhood ETO Objection Report

CONTEXT

In October 2020 the Council issued scheme approval for the implementation of the Oval to Stockwell LTN, along with a number of other interventions, under experimental traffic orders. The Oval to Stockwell LTN was defined as bounded by the A203 South Lambeth Road, the A3 Clapham Road and A202 Harleyford Road. The making of experimental orders superseded the temporary traffic orders used initially due to urgency. The use of experimental traffic orders enabled a statutory objection period in the first 6 months following implementation and also provided the basis for the enforcement of the scheme using traffic cameras.

The Council's constitution delegates authority to specified officer roles to consider objections received from statutory consultation as part of the TMO making process, (subject to a formal report setting out the objections, with clear recommendations, being submitted for approval) and the power to make, amend or revoke traffic orders, following the consideration of such objections.

This report presents valid objections received during the statutory objection period for the relevant traffic orders for the consideration of the decision maker in determining whether or not any of the provisions of the experimental orders will be made permanent.

EXPERIMENTAL TRAFFIC ORDER (ETO)

The Oval to Stockwell LTN was implemented under ETOs that were made on 16 September 2020 and came into force on the 28 September 2020. The objection period for the proposals therefore ran from 28 September 2020 until 28 March 2021.

Summary of Responses

There were 16 responses received during the course of the objection period, of these:

- 16 were from residents
- 0 were from councillors

OBJECTION THEMES AND RESPONSES

Table 1 below summarises 'in time' objections received within the six-month statutory objection period by theme. For each theme an officer response and recommendation are provided. Some objections received included multiple themes, and these are counted in the table.

Table 1: Valid Objections

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
<p>Methodology</p> <p>Recommend: <i>Not Accept</i></p>	<p>Lack of engagement with local community</p>	<p>1</p>	<ul style="list-style-type: none"> • Online consultation platform inputs not followed up on by TfL/ LBL Lambeth • CPZ pdf map of KR zone doesn't reference LTN • Q&A session not advertised on Lambeth website 	<p>1. Following the outbreak of the COVID-19 pandemic, local authorities were instructed by Central Government to implement emergency transport measures, at speed, to create space for social distancing and to encourage walking and cycling. This included the roll out of LTNs as well as pop-up cycle lanes and widened footways. LB Lambeth acknowledges public frustration around the lack of consultation on these schemes, but under the circumstances and with the resource available, every effort was made to engage with residents. Due to the high level of correspondence it has not been possible to respond individually to each correspondent.</p> <p>In spite of the speed of implementation and the Covid-19 pandemic restrictions on normal engagement, subsequent to their implementation as trials, Lambeth has gone above and beyond its normal procedure for transport schemes. It has done so by organising a range of different engagement sessions, including online Q&A's, local walkarounds, competitions, audits and a five week public consultation.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Lack of consultation</p>	<p>2</p>	<ul style="list-style-type: none"> • LA revenue generator; No consultation with residents • Residents not emailed when 	<p>2. Following the outbreak of the COVID-19 pandemic, local authorities were instructed by Central Government to implement emergency transport measures, at speed, to create space for social distancing and to encourage walking and cycling. This included the roll out of LTNs as well as pop-up</p>

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			scheme was implemented	<p>cycle lanes and widened footways. LB Lambeth acknowledges public frustration around the lack of consultation on these schemes, but under the circumstances and with the resource available, every effort was made to engage with residents. Letters have been sent to affected properties signposting information provided on the project website.</p> <p>In implementing the ETOs the Council has carried out the required statutory consultation and has also carried out a full non-statutory consultation on the schemes.</p> <p>Project officers and decision-makers are taking into account feedback received from multiple sources, including the public consultation, the 6 month statutory objection period and feedback received before the implementation of the scheme.</p>
Recommend: <i>Not Accept</i>	Dividing Community	2		<p>3. LTNs are a key part of the Council's adopted Transport Strategy which was widely supported at consultation. While we acknowledge concerns raised around community division we will seek to engage will all local stakeholders and groups to better understand and address any issues in order to bring people together and foster a sense of ownership and pride in the local area.</p> <p>It is expected that as over time and as the public and road users become accustomed to LTNs the reports of division between drivers and non-drivers will decrease.</p>

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Recommend: <i>Not Accept</i>	Data/ evidence base		<ul style="list-style-type: none"> • When and where were ATC counts placed • Cambridge report suggests impact on Air Quality has been negligible 	<p>4. Details on the monitoring scheme can be found online as part of the Stage 1 and Stage 2 monitoring process HERE. The appointed consultants are independent of the Council and have extensive experience and expertise in data analysis and assessment and were commissioned by Lambeth through a legal tender process. LB Lambeth rejects any notion that suggests the data is flawed or manipulated. Nonetheless, officers will be reviewing the LTN Monitoring Strategy to consider any improvements to approach, scope and presentation.</p>
Recommend: <i>Not Accept</i>	Monitoring Strategy	1	<ul style="list-style-type: none"> • Monitoring needs to take place across the whole area and beyond to the wider area • Same level of rigor applied to public opinion research and tracking of local perceptions throughout the trial period as to traffic and air quality monitoring 	<p>5. Details of scheme monitoring can be found online as part of the Stage 1 and Stage 2 monitoring process. The Monitoring Strategy includes measures of wider network performance, such as bus journey times. The Consultation Report summarises the feedback received from the community.</p>

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
Recommend: <i>Not Accept</i>	Equality Impact Assessment	1	<ul style="list-style-type: none"> • EQIAs don't recognise socio-economic disparity in LTN impacts 	6. The Equalities Impact Assessment covers socio-economic factors.
Traffic Recommend: <i>Not Accept</i>	Increased Traffic Volumes	6	<ul style="list-style-type: none"> • Bolney Street • Calais Street • Caldwell Street • Camberwell New Road • Clapham Road • Claylands Road • Clayton Street • Groveway • Hackford Road • Hanover Gardens • Harleyford Road • Lansdowne Way • Mursell Estate • Robsart Street • South Lambeth Road • Spencer Mews • St Michaels Road 	<p>7. Whilst some increases in traffic volumes have been recorded, the overall objective of the scheme, as set out in the Monitoring Strategy, has been met. It is considered that complementary measures planned for the surrounding network can mitigate any negative impacts recorded. The Council will continue to monitor the performance of the road network and seek to manage this to best effect in line with its statutory duties and adopted policies.</p> <p>Where traffic volumes have increased on streets within the LTN measures will be developed to address this as appropriate, following Healthy Route criteria.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage. LTNs synergise with a number of other policies, such as the Healthy Routes programme, the cycle parking programme and the road danger reduction programme. It is expected that together with these other programmes, LTNs will encourage a modal shift over time away from motorised vehicles and reduce traffic flows, including on boundary roads</p>

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			<ul style="list-style-type: none"> • St Stephens Terrace • Stockwell Park Crescent • Stockwell Terrace 	<p>LB Lambeth are taking proactive steps to work with our partners to mitigate some of the concerns around boundary and other roads.</p> <p>Short-term:</p> <ul style="list-style-type: none"> • Review of traffic signal phasing on Lansdowne Way and access to Stockwell Terrace • Monitor traffic volumes on the Cycleway / Healthy Route, focusing on roads where traffic is recorded to have increased and develop suitable responses as appropriate • Work with residents on the Mursell Estate to consider any changes required to the operation of Hampson Way <p>Medium Term:</p> <ul style="list-style-type: none"> • Monitor impacts of expanded Ultra Low Emission Zone (ULEZ) • Review of road layouts, introduction of measures to improve bus priority, walking and cycling provision. • Reinstatement of banned movements at main road junctions where possible • Supporting measures like greenscreens for schools and community buildings along busier roads • Working with TfL to manage traffic flows on the A3, A203 and A202.

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
				<p>Longer term:</p> <ul style="list-style-type: none"> • Further improvements to bus fleet • Electrification / zero emissions vehicles • Promote wider mode shift to walking and cycling • Lobbying TfL for continued improvements to signalised junctions and roads under their control, i.e. A3 • Commitment to carbon-neutral by 2030 • Working with TfL to deliver walking, cycling and air quality improvements at the Vauxhall Gyratory.
Recommend: <i>Not Accept</i>	Increased HGVs	1		8. The Oval to Stockwell LTN stage 2 monitoring report indicates that there has been an increase on some of the boundary roads but a significant decrease within the LTN. Although HGVs need access to site locations in residential areas it is expected that HGV's use main roads primarily and LTNs are an effective tool for avoiding HGVs cutting through residential areas to bypass main roads.
Recommend: <i>Not Accept</i>	Exacerbated by essential street works		<ul style="list-style-type: none"> • South Lambeth Estate Regeneration 	9. Officers work proactively to manage planned and unplanned disruption to the network as a result of street works, minimising impacts and co-ordinating work streams wherever possible. LTNs are designed to be resilient to temporary changes to the road network as a result of street works and procedures have been put in place to flag in advance any interventions that may cause disruption to LTN access routes. For unplanned works, officers are

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				<p>responsive to immediate issues that arise and will work with the relevant contractors and local stakeholders to minimise any negative impacts as far as possible.</p> <p>Project officers are working together with colleagues in the Homes for Lambeth and Lambeth Housing teams to minimise impact from HGVs that deliver to/come from housing regeneration sites in the area.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Increased emergency service times</p>		<ul style="list-style-type: none"> • Emergency service vehicles delayed by congestion caused by the LTN scheme • South Lambeth Estate • 'North Lambeth' 	<p>10. Emergency services have not expressed any significant concerns in relation to the schemes and response times. The schemes have been designed without physical barriers to allow access at all times.</p> <p>The Exemptions Policy allow for emergency response vehicles responding to major events.</p>
<p>Pollution</p> <p>Recommend: <i>Not Accept</i></p>	<p>Increase in Air Pollution</p>	<p>3</p>	<ul style="list-style-type: none"> • Calais street • Caldwell street • Camberwell New Road • Clapham Road • Claylands Road • Clayton Street • Harleyford Road • Hanover Gardens • Lansdowne Way 	<p>11. LB Lambeth commissioned an air quality modelling report for the LTN and you can read the full report here. A high-level summary is included below:</p> <ul style="list-style-type: none"> • The modelling indicates some localised impacts on air quality • The modelled changes in annual average NO2 concentrations between the post-scheme and pre-scheme scenarios range between a 0.6 µg/m³ reduction and a 1.3 µg/m³ increase. • All sites where traffic has reduced are likely to have seen slight to significant benefits in air quality. This includes a reduction in NO2 on the A3 Clapham Road

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			<ul style="list-style-type: none"> • Mursell Estate • Robsart Street • South Lambeth Road • St Michaels Road • St Stephen's Terrace • Stockwell Park Crescent, • Stockwell Park Road 	<p>as the eastern boundary of the Low Traffic Neighbourhood.</p> <ul style="list-style-type: none"> • Where traffic has increased any resulting negative impact is expected to be mitigated by the expansion of the Ultra Low Emission Zone. The ULEZ is expected to mean that all sites, including on boundary roads, will have better air quality compared to before the LTN was introduced. • The air quality modelling has analysed what the impact has been at all sensitive locations e.g., schools, care homes etc. All of the locations are within the legal limits. <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage and thus improve air quality. LTN's synergise with a number of other policies, such as the Healthy Routes programme, the Air Quality Action Plan and others. It is expected that together with these other programmes, LTN's will encourage over time a modal shift away from motorised vehicles and improve air quality, including on boundary roads.</p>
Recommend: <i>Not Accept</i>	Increase in Noise Pollution	2	<ul style="list-style-type: none"> • Caldwell street • Camberwell New Road • Clayton Street • Harleyford Road 	12. Noise levels relating to motor vehicles are expected to be linked to changes in traffic volume and composition, with the majority of roads within the scheme area anticipated to see an improvement. On some roads where volumes have increased and / or composition of traffic has changed, there may be

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			<ul style="list-style-type: none"> • Hanover Gardens • Lansdowne Way • Mursell Estate • Robsart Street • South Lambeth Road • Spencer Mews • St Michaels Road • St Stephen's Terrace • Stockwell Park Crescent • Stockwell Park Road 	<p>some increase in noise at certain times. LTNs are part of the Council's wider strategy to reduce motor traffic across the borough, which is ultimately expected to result in improvements to both air quality and noise disturbance on all roads.</p>

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Safety Recommend: <i>Not Accept</i>	Walking and cycling	1	<ul style="list-style-type: none"> • Albert square • Caldwell Street • Clapham Road • Claylands Place • Palfrey Place • Fentiman Road • Hackford Road • Lansdowne Way • St Michaels Road • St Stephen's Terrace • South Lambeth Road • Stockwell Terrace 	<p>13. LTN are expected over time to promote a modal shift away from motorised vehicles and improve air quality, including on boundary roads. It is also envisaged that walking and cycling will be safer. Academic research based on preliminary data suggests that LTNs, including the Oval to Stockwell LTN, have had a beneficial effect on pedestrian safety. Motor vehicle speeds are recorded to have decreased at a number of locations, reducing road danger.</p> <p>Officers will continue to work with Transport for London to bring forward improvements for cycling on the roads it controls.</p> <p>Lambeth Council continues to engage with local communities to envisage further improvements to walking and cycling.</p>
Recommend: <i>Not Accept</i>	Vulnerability at night		<ul style="list-style-type: none"> • South Lambeth Estate 	<p>14. Officers are currently undertaking street audits for roads within LTNs to identify issues relating to safety and accessibility. In partnership with the local community, we will be formulating a series of improvements which will be delivered in 2022/23 to help improve safety.</p>

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Recommend: <i>Not Accept</i>	Anti-social behaviour	1		15. LB Lambeth is not aware of any increase in ASB within the area as a result of the LTN.
Recommend: <i>Accept</i>	Anti-social driving (including aggressive driving and mopeds)	3	<ul style="list-style-type: none"> • Hanover Gardens • St Michaels Road • Mopeds/ motor-cycle non-compliance • Illegal and aggressive driving 	16. LB Lambeth recognises the issues highlighted around anti-social behaviour and driving. As a response, project officers installed additional bollards at the South Lambeth Estate to prevent vehicles from making illegal movements. Officers will continue to develop solutions for this space to mitigate against ant-social moped usage. In addition, LB Lambeth will work with the Lambeth Safer Transport Team at The Met to explore options for tackling this issue.
Recommend: <i>Not Accept</i>	Quieter streets feel more unsafe		<ul style="list-style-type: none"> • Reduced vehicle surveillance 	17. While there are fewer motor vehicles present, other activity, such as cycling, has increased significantly. From the Stage 2 monitoring report there was an 87% increase in cycling within the LTN and a 310% increase on Dorset Road alone. Increased levels of walking and cycling are expected to improve passive surveillance. On-street personal safety is a serious matter of wider community concern and officers will investigate the potential for targeted improvements, lighting upgrades for example
Recommend: <i>Not Accept</i>	Speeding	1	<ul style="list-style-type: none"> • Claylands Road • Fentiman Road • Hanover gardens • Palfrey Place 	18. Recorded traffic speeds have reduced at the majority of monitoring sites in the scheme area where baseline data is available. This includes a reduction of 15% on Fentiman Road, and 25% on Claylands Road. LTNs protect local streets from excessive

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			<ul style="list-style-type: none"> • South Lambeth Road • St Michaels Road • St Stephen's Terrace • Trigon Road 	<p>speed and this was a key rationale for their introduction in response to Covid-19</p> <p>LB Lambeth will work with the Lambeth Safer Transport Team at The Met to explore options for reducing vehicular speeds at locations with particular issues.</p>
<p>Accessibility</p> <p>Recommend: <i>Not Accept</i></p>	GPS Mapping			<p>19. Lambeth has conformed with its obligations to update the Gazetteer with the new Temporary and Experimental Traffic Orders. Furthermore, officers have gone above and beyond to try and directly engage with GPS software companies to update the closures, and are also using other methods of updating GPS systems more swiftly.</p>
<p>Recommend: <i>Not Accept</i></p>	Clearer signage needed on the ground	1	<ul style="list-style-type: none"> • Albert Square 	<p>20. The signage on the ground, both the signage at closure points as well as advance warning signage, conforms with the duties of the Council. Officers will review signage as part of the move to a permanent scheme.</p>

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Recommend: <i>Not Accept</i>	Impact on boundary roads Mitigating measures are needed for boundary roads	2	<ul style="list-style-type: none"> • South Lambeth Road • Clapham Road 	<p>21. Whilst we acknowledge that some increases in traffic volumes have been recorded on some boundary roads, the overall objective of the schemes, as set out in the Monitoring Strategy, has been met. Traffic is recorded to have decreased on Clapham Road. It is considered that complementary measures planned for the surrounding network can mitigate any negative impacts recorded. The Council will continue to monitor the performance of the road network and seek to manage this to best effect in line with its statutory duties and adopted policies.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage. LTN's synergise with a number of other policies, such as the Healthy Routes programme, the cycle parking programme and the road danger reduction programme. It is expected that together with these other programmes, LTN's will encourage a modal shift over time away from motorised vehicles and reduce traffic flows, including on boundary roads.</p>
Recommend: <i>Not Accept</i>	Potential increase in	3		22. Whilst in some cases there may be increased journey times for some trips by motor vehicle following the

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	vehicle journey time/cost for residents			<p>launch of schemes of this nature, there are also other factors that need to be considered when assessing traffic impacts, such as road works and the impacts of the COVID-19 pandemic on travel behaviour.</p> <p>From case studies outside of Lambeth, data suggests that, over time, any initial increase in traffic flows on boundary roads eventually settles down to previous levels as people choose alternative routes or take up a different modes of transport for their everyday journeys.</p> <p>LTNs are part of a wider Council strategy to reduce motor traffic levels and promote a shift to more sustainable modes and cost effective modes, particularly for shorter trips that many people can make by foot or cycle. The proposed approach to dispensations recognises that for some groups travel by motor vehicle is necessary and makes allowance for this.</p>
Recommend: <i>Not Accept</i>	Potential increase in vehicle journey time/cost for people with limited mobility, health reasons			<p>23. As a result of public feedback around the impacts of the LTNs on disabled people and associated carers, Lambeth has proposed an approach to dispensations based around the particular needs of disabled people who need to drive.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private)</p>

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	and people with disabilities			<p>car usage and switch trips that can be switched to other modes. LTNs synergise with a number of other policies, such as the Healthy Routes programme, encouraging the use of public transport and cycle training programme. It is expected that over time, together with these other programmes, LTNs will encourage a modal shift away from motorised vehicles and reduce car usage, including on boundary roads. This would free up road capacity for journeys that have to be made by motorised vehicles, such as journeys from disabled people that rely on cars.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Potential increase in vehicle journey time/ cost for services, essential workers and assistance to the area</p>			<p>24. As part of the Equalities Impact Assessment, project officers are monitoring accessibility for protected groups and those that provide support to these groups.</p> <p>The proposed approach to dispensations sets out where discretion will be exercised, including for responses to emergencies and health care providers.</p> <p>All locations remain accessible by motor vehicle for the provision of services, albeit this may involve a change of route.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage and switch trips that can be made by other modes.</p>

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				<p>It is expected that over time, as part of the wider Transport Strategy, LTNs will encourage a modal shift away from motorised vehicles and reduce car usage. This would free up road capacity for journeys that have to be made by motorised vehicles.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Potential increase in vehicle journey time for school run</p>			<p>25. Whilst in some cases there may be increased journey times for parents dropping off their children, there are also other factors that need to be considered when assessing traffic flows on boundary roads such as road works and the impacts of the COVID-19 pandemic.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage and switch trips that can be switched to other modes. This includes journeys that happen as part of the school run. We are working with schools and the Active Travel team to encourage trips to be made by more sustainable modes. Reducing the level of traffic on the 'school run' is an important part of our strategy in order to reduce congestion, improve air quality and health by promoting active travel modes.</p> <p>It is expected that over time, as part of the wider Transport Strategy, LTNs will encourage a modal shift away from motorised vehicles and reduce car usage. This would free up road capacity for journeys that have to be made by motorised vehicles</p> <p>From case studies outside of Lambeth, data suggests that this initial spike in traffic flows eventually settles</p>

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				<p>down to previous levels as people choose alternative routes or take up a different mode of transport for their everyday journeys.</p>
<p>Recommend: <i>Accept</i></p>	<p>Potential increase in vehicle journey time for Taxis</p>	<p>1</p>		<p>26. All addresses and residences in the area are still accessible by motor vehicles, including taxis. The routing to some addresses might change for a portion of the journeys.</p> <p>As a result of feedback received regarding the impact on taxis and the service they provide for some disabled people, the proposed approach to dispensations covers taxis and fully accessible private hire vehicles at the locations where buses are exempted.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Potential increase in vehicle journey time to hospitals/GPs</p>	<p>1</p>		<p>27. It is acknowledged that for some, particularly shorter trips by motor vehicle, journey times may increase.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage and switch trips that can be made by other modes. Many trips to healthcare facilities are already made by sustainable modes and the LTN is intended to improve these trips.</p> <p>The proposed approach to dispensations sets out where discretion will be exercised, including for responses to emergencies and health care providers as well as for Blue Badge holders.</p>

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				<p>It is expected that over time, as part of the wider Transport Strategy, LTN's will encourage a modal shift away from motorised vehicles and reduce car usage. This would free up road capacity for journeys that have to be made by motorised vehicles.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Resident exemption request</p>	<p>1</p>	<p>Please can you integrate why traffic is being diverted into this residential street or if the street and if there can be a local resident only restriction or another traffic system that prevents this street from being used as a cut through</p>	<p>28. LB Lambeth has considered granting general exemptions to residents in the scheme area, but concluded there is a high risk that the objectives of the LTN would not be met if this was introduced. Additionally, there are concerns around providing exclusive access to certain areas of public highway for certain residents.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Difficulty delivering to local residents</p>	<p>1</p>		<p>29. Whilst in some cases there may be increased journey times for some trips by motor vehicle following the launch of schemes of this nature, there are also other factors that need to be considered when assessing traffic impacts, such as road works and the impacts of the COVID-19 pandemic.</p> <p>All addresses and residences in the area are still accessible by motor vehicles, including for servicing.</p> <p>From case studies outside of Lambeth, data suggests that, over time, any initial increase in traffic flows on boundary roads eventually settles down to previous</p>

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				<p>levels as people choose alternative routes or take up a different modes of transport for their everyday journeys.</p> <p>Officers will work with local businesses and representative organisations to develop programmes that promote the use of sustainable delivery and freight services, reducing the level of motor vehicle use for these purposes.</p>
Enforcement Recommend: <i>Not Accept</i>	Money making scheme	1		30. It is not the intention of the scheme to generate income. LB Lambeth installed ANPR cameras to enable scheme enforcement in consultation with the emergency services. Physical closures were not supported by the emergency services due to the potential negative impact on response times. Motor vehicles that contravene the traffic restrictions are subject to fines in line with legislation.
Recommend: <i>Not Accept</i>	Appealing fine	1		31. Any appeals are dealt with through the Council's standard process in line with statutory requirements.
Recommend: <i>Not Accept</i>	Camera Vandalism	1		32. Vandalism has taken place during the trial period. As a result Lambeth increased surveillance of the affected areas and implemented a rapid response maintenance regime. This has resulted in significant reductions in vandalism.
Recommend: <i>Not Accept</i>	Sign Vandalism	1		
Streetspace Recommend: <i>Not Accept</i>	Negatively impacts public realm	1		33. The trial schemes have been implemented with temporary materials. LB Lambeth is committed to improving the public realm as key element of the LTN programme. This will include greening, seating, and cycle parking as well as accessibility improvements.

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				However, this area is subjective and in some cases the perception over the aesthetics of the public realm as a result of an LTN will differ.
Recommend: <i>Not Accept</i>	Concern about impact on local businesses	1		34. All businesses remain accessible by motor vehicle. Officers will work with local businesses and representative organisations to assist with any adaptations or support measures that may be required to manage a transition to the amended road network. Academic studies suggest that people on foot and cycle spend more in local businesses and that public realm improvements are also beneficial.
Recommend: <i>Not Accept</i>	Increase in prices at local businesses	1		35. No information has been presented to substantiate an increase in prices relating to the scheme.
Recommend: <i>Not Accept</i>	Speed/Traffic calming measures	1		36. Monitoring suggests that traffic speeds have fallen on streets within the LTN. LB Lambeth will be working with the Lambeth Safer Transport Team at The Met to explore options for reducing vehicular speeds at locations where issues are identified.
Recommend: <i>Accept</i>	LTN should be extended to other areas	1		37. Further LTN schemes are under development through community engagement.
Equalities Recommend:		1	<ul style="list-style-type: none"> • Journey times • Journey route 	38. Equalities Impact Assessment of the scheme has not identified any significant negative impacts on disabled people, however in some cases potential impacts

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<i>Not Accept</i>	Impact on people with a disability		<ul style="list-style-type: none"> • Ability to get out • Ability to receive support 	<p>have been identified and the proposed approach to dispensations and other measures aims to respond as appropriate. The Council will continue to monitor impacts, work with affected groups and representatives and develop and implement further adjustments and support services as appropriate.</p> <p>Much of current public realm, transport systems and road network are not accessible for disabled people, limiting where they can travel and by what means. Low Traffic Neighbourhoods may therefore have positive impacts for some disabled people, particularly those who are able to benefit from measures that make active travel more accessible or whose journeys were affected by the higher levels of traffic in their local area before LTNs were introduced.</p> <p>People who rely on private cars or taxis, or have carers who rely on cars, may experience increased journey times for some trips and different routes might be needed. The proposed approach to dispensations addresses this.</p> <p>The Council's analysis of journey times suggests that short trips starting on the edge or within LTNs are most likely to be affected by the introduction of LTNs in terms of proportionate increase in journey time. For longer trips any increase in journey times is expected to be minimal.</p>

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				Officers are working with Transport for All to further understand the impacts of LTNs on different groups through focus groups and user testing.
Recommend: <i>Not Accept</i>	Impact on carers	1	<ul style="list-style-type: none"> Ability to deliver support 	<p>39. Carers who rely on cars may experience increased journey times for some trips and different routes might be needed. The proposed approach to dispensations addresses this.</p> <p>As part of the Equalities Impact Assessment, project officers are monitoring accessibility for disabled people, as well as older people within the LTN and on boundary roads. The monitoring includes not just people from groups with protected characteristics, but also the people with caring responsibilities.</p> <p>As a result of public feedback around the impacts of the LTNs on disabled people and associated carers who need their car to attend vital appointments at their local medical centre, Lambeth has proposed an approach to dispensations which considers trips made by carers.</p> <p>Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage and switch trips that can be switched to other modes.</p> <p>It is expected that over time, as part of the wider Transport Strategy, LTN's will encourage a modal shift away from motorised vehicles and reduce car</p>

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
				usage. This would free up road capacity for journeys that have to be made by motorised vehicles.
Recommend: <i>Not Accept</i>	Impact on children	1	<ul style="list-style-type: none"> Children using the whole road for walking and cycling is dangerous 	<p>40. Whilst in some cases there may be increased journey times for parents dropping off their children by car, there are also other factors that need to be considered when assessing traffic flows on boundary roads such as road works and the impacts of the COVID-19 pandemic.</p> <p>41. Low Traffic Neighbourhoods are an important tool in the Council's suite of measures to reduce (private) car usage and thus improve air quality. LTNs synergise with a number of other policies, such as the Healthy Routes programme, the air quality action plan and electric vehicle charging infrastructure programme. It is expected that together with these other programmes, LTNs will encourage over time a modal shift away from motorised vehicles and improve air quality, including on boundary roads.</p> <p>Equalities Impact Assessment of the scheme has not identified any significant impacts relating to Age. The Council will continue to monitor impacts, work with affected groups and representatives and develop and implement adjustments and support services as appropriate.</p>

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
				<p>Children are particularly impacted by poor air quality at the roadside and are also vulnerable to road danger, both of which the proposal aims to address. The proposals offer the potential for more physical activity, including play, in areas where amenities may be limited, offering the potential to address issues of obesity and well-being.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Impact older people</p>	<p>1</p>		<p>42. Equalities Impact Assessment of the scheme has not identified any significant impacts relating to Age. The Council will continue to monitor impacts, work with affected groups and representatives and develop and implement adjustments and support services as appropriate.</p> <p>Some older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal. However, older people are less likely to drive. The proposal improves the ability to move through the area walking, using a mobility aid, adapted cycle or wheelchair.</p>
<p>Recommend: <i>Not Accept</i></p>	<p>Impact on health</p>	<p>1</p>	<ul style="list-style-type: none"> I have a long-term health condition and rely on family/friends who drive to tend to my needs and the LTN scheme is 	<p>43. Equalities Impact Assessment of the scheme has not identified any significant impacts relating to health.</p> <p>Positive impacts relating to health were identified in the form of quieter streets and walking and cycling benefits, but increased stress relating to confusion and more traffic on some streets is considered to have a potentially negative impact.</p>

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
			<p>impacting their ability to do that.</p> <ul style="list-style-type: none"> • My physical health has suffered due to the additional pollution caused by displaced traffic and increased congestion. • I am having to use my asthma inhaler more because of the increased pollution. • My child/children are having to use their asthma inhalers more because of the increased pollution. • I am contemplating 	<p>The approach to dispensations considers the needs of disabled people. The air quality modelling assessment details expected changes across the area. The Council will continue to work with partners to achieve a reduction in motor traffic across the borough together with fleet improvements to deliver a continuing improvement in air quality and health outcomes.</p> <p>The Council will continue to monitor impacts, work with affected groups and representatives and develop and implement adjustments and support services as appropriate</p>

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
			moving out of Lambeth due to the stress and anxiety caused by the LTN scheme.	
Recommend: <i>Not Accept</i>	Impact on lower socio-economics groups	3	<ul style="list-style-type: none"> The Oval Triangle Low Traffic scheme displaces traffic from one privileged residential area onto other less privileged residents 	<p>44. Equalities Impact Assessment of the scheme has not identified any significant impacts relating to socio-economic factors. The Council will continue to monitor impacts, work with affected groups and representatives and develop and implement adjustments and support services as appropriate.</p> <p>The scheme is aimed at improving the environment for all residents who live in and around the borough through creating equitable, safer streets for walking and cycling as well as looking to address issues such as health and wellbeing, climate change through tackling air pollution and inactivity.</p> <p>Lower income households are significantly less likely to have access to a motor vehicle. Access increases significantly as household income bands increase. 62% of local residents rely primarily on public transport (pre-Covid) for access to work, education or training. The LTN is expected to improve safe and affordable travel options.</p>
Recommend: <i>Not Accept</i>	Impact on ethnicity	1	<ul style="list-style-type: none"> Disadvantages Portuguese community 	45. Equalities Impact Assessment of the scheme has not identified any significant impacts relating to ethnicity.

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
			who don't participate / actively campaign	Lambeth Council is monitoring the impact and consultation on different ethnic and cultural background groups as part of the EQIA. In order to reach an audience as wider as possible, project officers have organised a variety of engagement events, including local stalls, online Q&A's, the current consultation and walkabouts.
Recommend: <i>Not Accept</i>	Impact on Gender	1		<p>46. Equalities Impact Assessment of the scheme has not identified any significant impacts relating to gender.</p> <p>47. LB Lambeth are currently undertaking street audits for roads within LTNs to identify issues relating to safety and accessibility. In partnership with the local community, we will be formulating a series of improvements which will be delivered in 2022/23 to help improve safety.</p>
Recommend: <i>Not Accept</i>	Impact on Religion/Belief	1		<p>48. Equalities Impact Assessment of the scheme has not identified any significant impacts relating to religion/ belief.</p> <p>LB Lambeth carried out an Equalities Impact Assessment for the Oval to Stockwell LTN which aims to identify the demographics of the area to better understand the diverse landscape London is known for. We are working on ensuring that our engagement and consultations go above and beyond regarding reaching as many groups as possible, so everyone has a platform to feed into proposals.</p>

Theme and Response	Sub-theme	Number of times themes mentioned	Specifics:	Response:
Public Transport Recommend: <i>Not Accept</i>	Increased Public Transport journey times	1		<p>49. No significant impact on bus journey times as a result of the schemes has been identified.</p> <p>Officers are working with TfL to monitor bus journey impacts and service levels as part of the monitoring strategy for the LTN. We will continue to try and deliver improvements for local bus services, including those on red-routes. Some initial work has been undertaken to introduce longer bus lane operational hours on roads in the wider area.</p> <p>Lambeth also recognises that changes in side street traffic, i.e. an increase or decrease of traffic turning in/out of a side street, can affect bus routes. We will continue to monitor this as well.</p>

Out of Time Objections:

In addition to 'in time' objections, 27 scheme specific objections were received outside the statutory period (these were logged up to the end of non-statutory consultation period on 11/10/2021). These specific objections do not include any additional themes to those presented in Table 1 above.

General responses:

In addition to objections specific to the Oval to Stockwell LTN, since the implementation of the experimental orders for this scheme, responses objecting to 'all LTNs' for various reasons have been received from 1,071 individuals.

A community promoted template facilitated individuals to object to all Low Traffic Neighbourhoods, with 'statement' categories for respondents to select as appropriate according to their circumstances. These are shown in Table 2 below which maps each statement category to the relevant response provided for valid objections in Table 1 above.

Table 2: Response categories

Statement	Response
1. I object to the LTN scheme(s) and would like to see the LTN scheme(s) removed.	NA
2. I am disabled and cycling, or walking are not viable options for me. The LTN restrictions make it difficult for me to travel freely.	Table 1, Response 23, 24 and 38
3. I have a long-term health condition and rely on family/friends who drive to tend to my needs and the LTN scheme is impacting their ability to do that.	Table 1, Response 24
4. My physical health has suffered due to the additional pollution caused by displaced traffic and increased congestion.	Table 1, Response 7, 11 and 43
5. My mental health has suffered due to the stress caused by the negative consequences of the LTN scheme.	Table 1, Response 43
6. I am having to use my asthma inhaler more because of the increased pollution.	Table 1, Response 11, 43

Statement	Response
7. My child/children are having to use their asthma inhalers more because of the increased pollution.	Table 1, Response 11, 43
8. I am contemplating moving out of Lambeth due to the stress and anxiety caused by the LTN scheme.	Table 1, Response 43
9. I have become isolated due to lack of visits from family or friends who are unable to visit due to LTN congestion and/or the fear of inadvertently incurring a LTN penalty fine.	Table 1, Response 23,24
10. I have caring responsibilities for a family member/elderly resident/friend and am unable to fulfil my duties due to traffic congestion caused by the LTN scheme.	Table 1, Response 24
11. I am elderly and cycling or walking are not viable options for me. The LTN restrictions make it difficult for me to travel freely.	Table 1, Response 42
12. My trips out have had to be reduced due to increased taxi fares and/or congestion on the main roads due to the LTN scheme.	Table 1, Response 26
13. My journey to work is being significantly delayed causing me to have to set off much earlier and get home much later than before.	Table 1, Response 7
14. I am spending significantly more time on the roads traveling for work and less time with my family.	Table 1, Response 7
15. I cannot open our windows in our house now because of the increased pollution and noise.	Table 1, Response 11
16. My road is busier and/or more congested because of the LTN scheme.	Table 1, Response 7
17. I am a tradesperson/delivery driver and my earnings have been negatively impacted by the LTN scheme.	Table 1, Response 29
18. I own a local business and the LTN scheme is negatively affecting my trade and putting my business at risk.	Table 1, Response 34

Statement	Response
19. I have experienced tradespeople increasing their prices or refusing jobs due to the problems caused by the LTN scheme.	Table 1, Response 35
20. I have had to increase my charges and/or refuse jobs for the services I provide due to the problems caused by the LTN scheme.	Table 1, Response 29
21. I need to walk or cycle along a main road regularly and am concerned by the impact of the LTNs on traffic levels on these vital routes.	Table 1, Response 7
22. I am a cyclist but it has become more dangerous with these LTN schemes due to the increased traffic on the main roads.	Table 1, Response 7
23. I have young children and my ability to get them to nursery/school/after school clubs is significantly impacted by the LTN scheme.	Table 1, Response 25
24. I am concerned that my local schools are being affected by high pollution levels and noise from traffic congestion.	Table 1, Response 7 and 11
25. My journey to school is being significantly delayed causing me to have to set off much earlier and get home much later than before.	Table 1, Response 7,11 and 25
26. My walking route has become more polluted, congested and dangerous to use.	Table 1, Response 7,11
27. I have been affected by an increase in noise, air pollution and congestion since the LTN was introduced.	Table 1, Response 7,11
28. I have missed appointments due to the traffic congestion caused by the LTN scheme.	Table 1, Response 7
29. I have seen emergency service vehicles delayed by congestion caused by the LTN scheme and I am concerned about potential tragedies as a result of these delays	Table 1, Response 10

Statement	Response
30. I do not feel safe walking on LTN roads which now have almost no traffic as they feel deserted and desolate.	Table 1, Response 14
31. When I take a taxi, journeys are taking longer, costing more and some drivers have refused to drive me into the LTN or to my doorstep causing me to have to walk the last part of the journey.	Table 1, Response 26
32. I am concerned that in the event of a major emergency (fire, explosion, terrorist attack), people would be unable to move about freely.	Table 1, Response 10
33. People who live or go to school on busy roads should not have to experience the pollution impacts of the displaced traffic and I believe this is contrary to Climate Justice.	Table 1, Response 7 and 11
34. The LTN schemes have made it harder for me to remain living here because of the pollution, noise, quality of life and road safety issues.	Table 1, Response 7,11.
35. Necessary roadworks caused by utility companies are further exacerbating the problem and causing traffic gridlock	Table 1, Response 9
36. I no longer visit the same places that I used to for dining/leisure/shopping purposes because of the LTN restrictions.	Table 1, Response 22
37. I am a registered carer and am unable to fulfil my duties due to traffic congestion caused by the LTN scheme.	Table 1, Response 23, 39