

CABINET MEMBER DELEGATED DECISION 8 JUNE 2022

Report title: Streatham Hill Low Traffic Neighbourhood

Wards: Streatham Hill East, St Martin's

Portfolio: Cabinet Member for Sustainable Lambeth and Clean Air, Cllr Rezina Chowdhury

Report Authorised by: Bayo Dosunmu, Strategic Director of Resident Services

Contact for enquiries: Simon Phillips, Head of Transport Strategy and Programmes, sphillips2@lambeth.gov.uk, 020 7926 4067

REPORT SUMMARY

In accordance with the Council's Transport Strategy (2019), Transport Strategy Implementation Plan (2019), Transport Strategy COVID-19 Emergency Response (2020), COVID-19 Transport Strategy Programme (2020) and Climate Action Plan (2022), this report sets out proposals to introduce permanent traffic restrictions in the Streatham Hill area in order to reduce traffic volumes and collisions, deliver better conditions for walking and cycling, improve the local environment and reduce emissions. These proposals are informed by the Streatham Hill Low Traffic Neighbourhood experimental traffic scheme that ran from October 2020 to April 2022.

FINANCE SUMMARY

The projected cost of the proposals, comprising the making of traffic orders, is £6,000.

The scheme will be funded by the approved Sustainable Transport and Public Realm capital allocation for Low Traffic Neighbourhoods, this funding to be supplemented by grant funding should this become available.

RECOMMENDATIONS

1. To delegate authority to officers to carry out statutory consultation under Regulation 6 of the Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996 referred to below in paragraph 4.9.
2. To delegate authority to officers to publish Notice of the Proposal under Regulation 7 of the Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996 and referred to below in paragraph 4.10.
3. Subject to recommendations 1 and 2, to issue scheme approval for the Streatham Hill LTN permanent scheme comprising traffic restrictions in the area bounded by the South Circular/A205 to the north, Leigham Vale to the southeast, Leigham Court Road to the south and Streatham Hill/A23 to the west.

4. That subject to the approval at recommendation 3 above, to delegate to the Strategic Director of Resident Services authority to consider by way of a written report responses resulting from the statutory consultation and objections following the publication of the Notice of Proposal, and whether or not to hold a public inquiry.
5. To revoke the experimental traffic order comprising restrictions at Mount Nod Road and Rosedene Avenue, with these restrictions to be incorporated into the permanent scheme.
6. To have due regard to the Equalities Impact Assessment prepared for the purposes of this report. (Appendix B).
7. That subject to the above, and having due regard to the outcome of the consultation referred to in recommendation 1, the objections and any inspector's report following the public inquiry, if any, to implement the scheme under permanent traffic management orders and traffic order notices made under the provisions of sections 6, 45, 49, 124 and Schedule 1 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984.
8. That subject to approval of recommendation 7 above to approve use of £6,000 from the Sustainable Transport/Public Realm theme within the Capital Investment Programme (CIP) approved in July 2020 towards the implementation of the scheme referred to in paragraph 2 and illustrated in drawings no. A.1 to A.8 in Appendix A.

CONTEXT

1.1 The proposed scheme scope is defined as the area bounded by the South Circular/A205 to the north, Leigham Vale to the southeast, Leigham Court Road to the south and Streatham Hill/A23 to the west. As with all LTNs the aim of the proposal is to reduce traffic across the borough and deliver the following improvements for residents and visitors to this locality:

- reduce traffic volumes across the neighbourhood to deliver improved air quality, improved safety and create street spaces where people can socialise and play
- preserve motor vehicle access so residents and local business can use cars and vans when they need to
- enable people to travel safely through the area by walking, cycling, scooting or wheeling

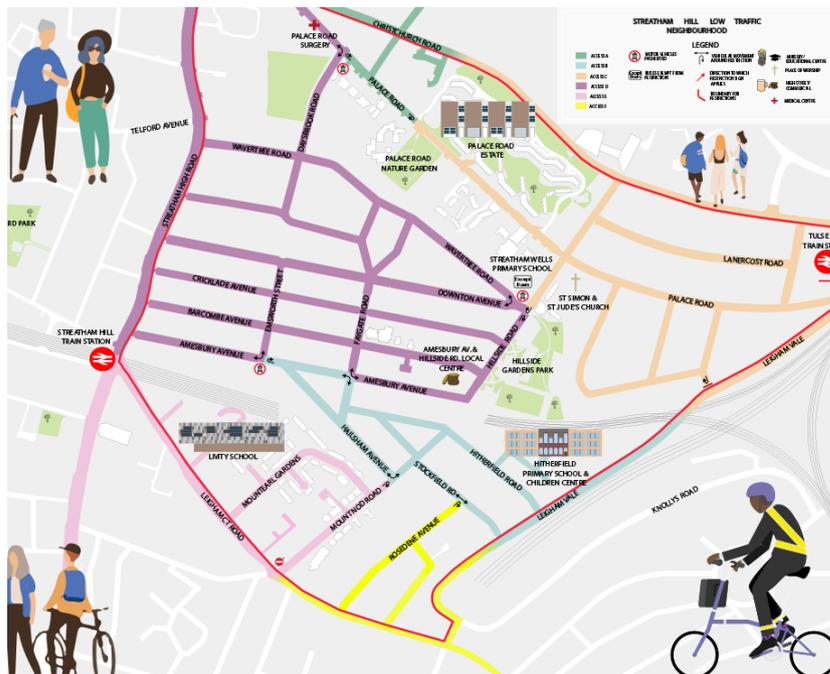


Figure 1: Scheme Area

1.2 The Transport Strategy Implementation Plan (TSIP) sets out the delivery of the Lambeth Council Transport Strategy objectives to make borough transport networks safe, efficient, inclusive, sustainable and healthy. The introduction of LTNs is recommended within the TSIP as an effective delivery intervention that achieves these criteria by strategically filtering residential streets to reduce non-local motor vehicle traffic whilst retaining access at all times. Such measures can encourage a mode shift from motor vehicle travel to active travel and reduce the negative impacts associated with motor vehicle travel such as road danger, air pollution and carbon emissions. The overall objective of traffic reduction can reduce congestion making essential trips easier to make on the network. Since most Lambeth households do not own a car, measures to re-allocate space and priority within the surface transport system towards active travel are proportionally beneficial.

1.3 On 15 May 2020, Lambeth Council approved its Covid-19 Transport Strategy Programme, which allocated Council funds to implement a range of measures to ensure the safe and effective functioning of the transport network and sustainable recovery from the pandemic. Included in the programme is the creation of a Streatham Hill Low Traffic Neighbourhood. Funding was subsequently also received from the DfT and TfL towards the creation of a trial LTN in Streatham Hill.

- 1.4 On 25 February 2021, the Secretary of State for Transport issued statutory guidance in relation to the effect of Covid-19 on highway network management. The Guidance states that to encourage active travel and to enable social distancing, local authorities should take measures to re-allocate road space to people walking and cycling. It emphasises these measures should be taken as swiftly as possible. Guidance recommends, for example, creating modal filters whereby planters or large barriers are used to close roads to motor traffic, creating neighbourhoods that are low-traffic or traffic free.
- 1.5 A sudden increase in the number of statistically vulnerable road users sharing existing road networks with motor vehicles, like that resulting from the Covid-19 related travel restrictions in London, means that there is a likelihood that fatalities will increase proportionality. Highway Authorities are therefore obliged to take immediate action to protect road users from serious injury or death by making road safety interventions, including prohibiting vehicles where necessary, and may do so using temporary traffic management orders facilitated specifically by powers in the "Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020" to implement traffic management schemes that support travel during the pandemic.
- 1.6 In accordance with 1.3, 1.4 and 1.5 above, temporary traffic restrictions consisting of modal filters were introduced on 15 August 2020 to create the Streatham Hill LTN. Filters were located at Downton Avenue junction with Hillside Road, Amesbury Avenue at its junction with Faygate Road, Amesbury Avenue at its junction with Emsworth Street and Palace Road near its junction with Daysbrook Road bounded by the South Circular/A205 to the north, Leigham Vale to the southeast, Leigham Court Road to the south and Streatham Hill to the west. These restrictions are shown on drawings no. A.1 to A.4 in Appendix A.
- 1.7 In October 2020 the Council took a decision to introduce a series of experimental measures across the borough to create low traffic neighbourhoods, assist social distancing and improve the cycling environment. This decision issued scheme approval for the Streatham Hill LTN and authority to implement the scheme using experimental traffic orders which were subsequently made and came into effect on 26 October 2020.
- 1.8 The council committed to monitoring the experimental LTN schemes introduced in response to the Covid-19 pandemic to see if they were delivering the intended aims and if any changes were required. The general process is set out in a published LTN Monitoring Strategy. The published Stage 1 Review for Streatham Hill focused on identifying community issues and traffic impacts to identify specific design improvements where needed. Traffic counts showed that roads within the low traffic neighbourhood, which provided a route between Leigham Vale and Leigham Court Road, had seen a large percentage increase in through traffic. This increase in through traffic was verified by feedback received from residents, who also provided details on how this was impacting their lives.
- 1.9 After reviewing Stage 1 data and as a result of feedback received from residents, in April 2021 the Council took a decision to introduce additional restrictions located at Mount Nod Road and Rosedene Avenue, with the effect of preventing through traffic travelling between Leigham Vale and Leigham Court Road by using streets within the LTN. These restrictions and associated waiting restrictions are shown on drawings no. A.5 to A.8 in Appendix A. This decision issued scheme approval for the addition measures and authority to implement the scheme using experimental traffic orders which were subsequently made and came into effect on 21 May 2021.

1.10 Tables 1 and 2 below summarise the restrictions that comprised the Streatham Hill LTN experimental scheme (initial and additional scheme area). The initial scheme came into effect in October 2021 and the experimental period ended after 18 months in April 2022.

Table 1 - Summary of traffic restrictions

Traffic restriction ID	Location	Type
1	Palace Road near its junction with Daysbrook Road	Bi-directional motorised vehicle prohibition
2	Amesbury Avenue at its junction with Emsworth Street	Bi-directional motorised vehicle prohibition
3	Amesbury Avenue at its junction with Faygate Road	Bi-diagonal modal filter between north and south arms of the junction
4	Downton Avenue near its junction with Hillside Road	Bi-directional 'bus gate'
5	Hillside Road near its junction with Downton Avenue	Bi-directional motorised vehicle prohibition
6	Mount Nod Road near its junction with Hailsham Avenue	Bi-directional motorised vehicle prohibition
7	Rosedene Avenue near its junction with Stockfield Road	Bi-directional motorised vehicle prohibition

Table 2 - Summary waiting restrictions changes

Waiting Restriction ID	Location	Proposal	Reason
A	Hillside Road	No waiting at any time restrictions	To maintain visibility and provide turning facilities for vehicles south of Downton Avenue
B	Palace Rd	No waiting at any time restrictions	To maintain visibility and provide turning facilities for vehicles south of Daysbrook Road
C	Mountearl Gardens	No waiting at any time restrictions	To introduce additional passing places for residents and the Ambulance Station
D	Mount Nod Road	No waiting at any time restrictions	To maintain visibility and provide turning facilities for vehicles south of Hailsham Avenue
E	Rosedene Avenue	No waiting at any time restrictions	To maintain visibility and provide turning facilities for vehicles south of Stockfield Road

PROPOSALS AND REASONS

Objectives

- 2.1 In January 2019 Lambeth became the first council in London to declare a Climate Emergency and the Corporate Carbon Reduction Plan reasserts the Council's commitment to taking all actions necessary in response to the climate crisis. Transport accounts for a significant proportion of the borough's CO2 emissions and traffic reduction, together with the switch to zero emissions vehicles, will be required to deliver the necessary change in this area. The adopted Climate Action Plan 2022 sets out a range of key objectives that will be required to remove CO2 emissions by 2030, including the necessity to reduce motor vehicle traffic in Lambeth by 27% over that period.
- 2.2 The objectives for the Council's LTN programme, including for Streatham Hill, are set out in the Monitoring Strategy. The main objectives are to achieve a reduction in through motor traffic within LTN areas and an overall reduction of motor vehicle movements across the area, when considering boundary and internal roads together. Further objectives include reducing motor vehicle speeds and traffic collisions, improving air quality, increasing levels of walking and cycling, supporting the local economy and positive equalities impacts.
- 2.3 The TSIP Low Traffic Neighbourhood Plan had prioritised scheme areas based on a range of similar criteria – air quality, safety, travel to school, walking and cycling routes and motor traffic levels.
- 2.4 Traffic data from 2019 indicated that more than 75% of motor traffic using Hillside Road, Downton Avenue, Amesbury Avenue and Palace Road in the busiest times did not originate from or was not destined for the local area. The consequences of high vehicle traffic volumes in residential areas include a) road danger threat to those road users most at risk b) perceived danger and discomfort suppressing active travel and mode shift to sustainable travel, c) air pollution and d) noise pollution. The proposals were also expected to have a significant beneficial impact in terms of pedestrian (including those who require the use of mobility aids) and cycle movements in the area, making these safer, more convenient and more accessible.
- 2.5 Mount Nod Road and Hillside Road form part of the borough's adopted Healthy Route Network, as defined in the TSIP Healthy Route Plan, connecting Streatham and Herne Hill. To meet the defined Healthy Route criteria, motor vehicle traffic must be separated or sufficiently low so that people walking, wheeling, scooting and cycling the route are comfortable and safe. At this location, officers consider a traffic management approach to be more suitable than the provision of separated cycle infrastructure.
- 2.6 In order to achieve these objectives and address identified issues in the local area, the intended effect of the proposal is to prevent through motor traffic from traversing the residential streets within the area bounded by the South Circular/A205 to the north, Leigham Vale to the southeast, Leigham Court Road to the south and Streatham Hill/A23 to the west.

Assessment of Impacts

Assessment approach and observations

- 2.7 Evaluation of the likely impacts of the proposals is informed by monitoring carried out to assess the impact of the experimental scheme. Based on this, officers consider that the proposals are likely to result in significant benefits, meeting the identified criteria for success in most areas, and that complementary measures can be brought forward to address any negative impacts identified.

- 2.8 In accordance with the agreed Monitoring Strategy, the Council carried out two rounds of traffic and related assessments to evaluate the performance of the Streatham Hill LTN experimental scheme. Stage 2 monitoring in June 2021 showed that the scheme was meeting the key objective of reducing traffic overall, when considering internal and boundary roads together. Recorded traffic levels had decreased by 5% overall, or around 4,500 vehicles a day. Within this headline figure, traffic had decreased by 54% on internal streets, but risen by 13% on boundary roads. Levels of cycling had increased significantly both on internal and external roads, while volumes of heavy and light goods vehicles had decreased overall. This data is summarised in the project stage 2 monitoring report – see Appendix D.
- 2.9 The experimental scheme area included the Mount Nod / Hillside Road corridor that is designated as a Healthy Route - priority corridors for walking and cycling. The TSIP Healthy Routes Plan sets out criteria which roads must meet in order to achieve Healthy Route status. Traffic surveys pre-pandemic show typical volumes on key roads in the LTN well in excess of the Council's Healthy Routes quality criteria. Traffic on Hillside Road was c. 5,000 motor vehicles per day. Following the introduction of the experimental scheme both Mount Nod / Hillside Road were compliant with the required standard for maximum traffic volumes at the busiest times.
- 2.10 Due to a lack of baseline data, it has not been possible to carry out an assessment of impacts on levels of walking / wheeling following the introduction of the experimental scheme. Recent academic research however indicates that walking is likely to be the main beneficiary of similar traffic restraint schemes¹. Further longitudinal studies are required, but in particular a significant safety benefit for pedestrians has been noted in this research.
- 2.11 Stage 2 monitoring also covered air quality impacts. The Council commissioned independent specialists to carry out air quality modelling across the LTN. Some increases in emissions were identified on boundary roads, but there were no new locations where air quality breached legal limits following the introduction the Streatham Hill and Tulse Hill LTNs. For more details see Section 9.
- 2.12 Some local businesses have suffered significant disruption due to the effects of the Covid-19 pandemic and officers in the Transport team have worked closely with the High Streets team to deliver targeted engagement around the LTN programme. While access by motor vehicle is maintained to all premises, some businesses have reported a decline in custom due to a lack of 'passing trade'. While empirical evidence suggests that, generally, schemes that promote walking and cycling increase retail spend and that people who walk and cycle spend significantly more than those than those travelling by car², some specific issues have been identified and officers are working with businesses to make the schemes work for them as best as possible, including developing sustainable freight options such as provision of cargo cycles.
- 2.13 Some indicators, such as road traffic casualties, need to be monitored over a longer period in order to draw robust conclusions (although see 2.10 above). The Council will continue to monitor the proposed scheme and area impacts as part of its strategic monitoring programme.
- 2.14 Community engagement took place throughout the experimental scheme period and the Council also carried out a full, non-statutory public consultation in addition to receiving objections and representations to the traffic order as part of the statutory process – see Section 5.

¹ <https://findingspress.org/article/25633-impacts-of-2020-low-traffic-neighbourhoods-in-london-on-road-traffic-injuries>

² <https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>

2.15 See Section 7 for equalities impacts.

Network considerations

- 2.16 The expected and measured impact of the proposals have been considered in the wider context of the local road network in line with the Council's legal responsibilities under section 122 of the Road Traffic Regulation Act (RTRA) 1984 to secure the expeditious, convenient and safe movement of vehicular and other traffic, including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. When exercising its functions under the RTRA, the Council must under section 122(1) so far as practicable having regard to the matters specified in subsection (2) secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. The "matters specified" in subsection (2) are (1) the desirability of securing and maintaining reasonable access to premises; (2) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run; (3) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy); (4) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles and (5) any other matters appearing to the local authority to be relevant". Section 122 of the RTRA involves a balancing exercise that has involved the Council's officers having in mind the section 122(1) duty, having regard to factors pointing in favour of imposing a restriction on that movement (as discussed in this report), balancing the various considerations and coming to the conclusion that the recommendations in this report represent the appropriate outcome. The factors which have pointed in favour of imposing a restriction on that movement have included the objective of reducing pollution and carbon emissions, improving health outcomes, reducing collisions and reclaiming neighbourhood streets for pedestrians. The Council as a local traffic authority must under section 16(1) of the Traffic Management Act 2004 manage its road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the objective of securing the expeditious movement of traffic on the Council's highway network and facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority. Section 162(2) of the 2004 Act refers to action which the authority may take in performing the network management duty including, in particular, the stated action and which may involve the exercise of the stated power. Officers consider that the adoption of the recommendations in this report will discharge the network management duty.
- 2.17 A key principle of the approach is that all premises within the LTN areas remain accessible by motor vehicle at all times, albeit with different access routes in some cases. Thereby reasonable access is retained.
- 2.18 While motor vehicles will continue to have access to the LTN area, the reduction / removal of through routes will result in a decrease in traffic on local streets, reinforcing any existing restrictions and preserving and improving safety and amenity in the area. The expected reduction in motor vehicles of all types within the area is also expected to reduce road danger. Any impact on the main road network is expected to be mitigated by the more controlled environment on such roads, but this effect will also be monitored.
- 2.19 The experimental scheme was designed to ensure no impediment to emergency service vehicles. These were exempted from the restrictions which were camera enforced rather than having

physical barriers. Ongoing engagement with emergency services during the trial period has not identified any significant concerns in terms of access or journey times.

- 2.20 Given the changes to motor vehicle routing involved, it has been important to provide adequate information to alert drivers to these changes in order to avoid confusion. As well as providing information direct to residents in advance of implementation, the experimental scheme included a comprehensive signage schedule to provide advanced warning on-street. Many drivers rely on satellite navigation systems and the network changes were published to service providers via updates on the One Network system as well as by contacting providers directly. As some providers update their systems in real time based on observed traffic movements and given that, initially, a relatively high level of non-compliance with the restrictions occurred, some systems have provided inaccurate information to service users. At the filter locations themselves, additional signage on-street warning of the restrictions has been prominently displayed. Given that the proposed permanent scheme will retain the ability for exempted / authorised vehicles to pass through the modal filters a certain level of non-compliance is to be expected going forward.
- 2.21 Prior to the introduction of the experimental scheme, data analysis had shown significant levels of through traffic in the LTN areas – see 2.4. The roads within the proposed scheme area are largely unclassified and from a network perspective not intended to carry significant volumes of traffic. Monitoring shows that the schemes have been effective in addressing this – see above. The proposed scheme will therefore reinforce a network management approach where non-local traffic is directed to the principal road network which has been designated and designed for this purpose, with local roads providing access and links to this.
- 2.22 The experimental scheme monitoring scope included an assessment of impacts on scheme boundary roads and the wider road network. Boundary roads were assessed in a similar way as roads within the scheme areas, with periodic traffic surveys being the key measure. Increases in level of cycling were recorded. Comparisons of motor traffic volumes show that there were traffic volume increases on the borough roads Leigham Court Road (+26%) and Leigham Vale (+7%), although with reduced impacts compared to Stage 1 data collected in October 2020.
- 2.23 Officers are engaging with Transport for London regarding impacts on the TfL road network ('red routes') which includes the A205 South Circular and A23 Streatham Hill. The A205 has reported a 13% increase in traffic volumes at Stage 2 with a 3% increase recorded on the A23.
- 2.24 On roads where traffic volume increases were recorded as increasing, officers will carry out further monitoring and develop mitigation measures alongside the proposed scheme as appropriate, for example changes to traffic signal timings and provision of better infrastructure for walking, cycling and buses – see 2.38 below for identified improvements.
- 2.25 Officers have faced some challenges in assessing the specific impact of the experimental scheme on the wider network given that traffic patterns are affected by a variety of factors and the further away from the LTN, the harder it becomes to determine that impact. Due to urgency, it was not possible to commission traffic modelling studies to forecast scheme impacts in advance of implementation. The experimental scheme, however, allowed impacts to be assessed in real time and the Strategic Transport Authority, Transport for London (TfL), has provided data on bus performance and other network data relevant to the affected areas. A summary of impacts has been provided to TfL's Network Performance team and no significant concerns have been raised.
- 2.26 No impacts relating to the experimental scheme have been recorded affecting other neighbouring Highway Authorities and no representations have been received from these.

2.27 Assessment of changes to journey times by motor vehicle indicate that, in some cases, these may have increased where traffic that previously used local streets has been diverted to the main road network. In particular, short journeys by motor vehicle may take longer in some cases. These effects were anticipated in the design of the scheme which seeks to prioritise sustainable modes of travel – walking, cycling, public transport – over private car use, consistent with the Council’s adopted policy, as well as regional and national policy and guidance. In particular, it is anticipated that short car trips can in some cases be replaced with walking and cycling trips where low levels of motor traffic provide an environment where more people feel confident to travel by these modes. Non-motorised traffic is able to pass through all modal filters without restriction.

Proposed permanent scheme

- 2.28 As discussed in Section 1, the experimental scheme was implemented in two phases, with the first phase ending in April 2022. Consideration was given to converting the experimental traffic order to a permanent order, following the statutory process allowing for this, but insufficient time remained to complete this process with the maximum 18 month experimental period.
- 2.29 As experimental schemes cannot be extended beyond 18 months the scheme is being de-commissioned pending a decision on whether to introduce a permanent scheme.
- 2.30 For the proposed permanent scheme no changes are proposed to the experimental traffic orders that comprised the experimental scheme as summarised in Section 1. While alternative scheme designs have been considered, the current layout is considered to be the most effective network design available.
- 2.31 Further to the matters set out in this report and having regard to the considerations listed in 4.6 (a) to (e) below, officers consider that the proposed scheme will enable the Council to meet its duty under section 122 of the RTRA 1986 to secure the expeditious, convenient and safe movement of vehicular and other traffic, including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. This assessment is informed by traffic monitoring data collected and published in the Streatham Hill LTN Stages 1 and 2 Monitoring Reports and discussed above.
- 2.32 As with the experimental scheme, ANPR cameras will be used to encourage compliance with the permanent restrictions as the filters allow passage for exempt vehicles. Data gathered through the enforcement cameras to date show that for the experimental scheme about 90% of penalty charge notices have been issued to people who live outside of the scheme area, with the highest proportion of them living outside of Lambeth.
- 2.33 It is important to consider that the proposals are expected to have a beneficial impact in terms of pedestrian and cycle movements in the area, making these safer, more convenient and more accessible. This is a key rationale for the proposals.
- 2.34 The proposals are expected to result in an overall reduction in motor vehicle traffic, taking the area within the LTN and the surrounding roads together. Air quality is expected to improve on streets within the LTN due to reductions in motor vehicle traffic levels. Air quality on boundary roads is not expected to change significantly, but these effects will be monitored and reported with potential further measures depending on the outcome of this.
- 2.35 The proposed scheme is designed to ensure no impediment to emergency service vehicles. These will be exempted from the restrictions which are proposed to be camera enforced.

2.36 The Council has agreed an exemptions policy in relation to LTNs and this will be applicable to the proposal. The policy is grounded in equalities analysis carried out across the wider LTN programme and includes a dispensation for Blue Badge holders. For more details see Section 7.

Area Improvements

2.37 The proposed scheme will initially be comprised of temporary infrastructure, equivalent to the measures implemented to enforce the experimental scheme. Further public engagement will then be undertaken to co-design more substantial public realm improvements at and around the traffic filter locations and at other locations across the scheme area. The Council has established a dedicated Community Street Design Team for this purpose. These improvements will be subject to a separate decision.

2.38 While the experimental scheme is assessed to meet the objective criteria for success set out in the Monitoring Strategy, a number of complementary measures have been identified for the permanent scheme:

- Implement small scale accessibility improvements across the area based on street audits carried out and with input from Transport for All
- Extra traffic calming on Leigham Vale
- Traffic calming on Leigham Court Road, part of 20mph project
- A new cycling and walking crossing, part of Peckham to Streatham Healthy Route
- New pollution blocking green screens at locations along the A205
- New air quality monitors on south circular
- Green screens installed at Dunraven School and Hitherfield Primary School. All local schools will be offered the opportunity to install screens
- A23 Improvement Scheme: new cycle lane and safe crossings on Streatham Hill, led by Transport for London.
- Leigham Court Road Safety and Bus Priority scheme
- Deliver sustainable travel improvements for local residents such as cycle and walking training and expanding bike hangar provision.
- Targeted provision of free cycle training for children and adults and initiatives to promote walking
- Work with local businesses to incentivise delivery and servicing via sustainable modes e.g., cargo bikes, further develop outside space offer and progress plans to improve the town centre environment
- Review of lighting and other measures to improve feelings of safety at night-time

Exemptions

2.39 As part of public consultation on the experimental scheme (see Section 5), the Council has published its proposed Exemptions Policy for all current and future LTNs in the borough – see Appendix F. Exemptions were already in place as part of the experimental scheme covering Emergency Service vehicles, pedal cycles, buses and certain other vehicles carrying out statutory duties. These exemptions will carry forward to the proposed scheme.

2.40 In addition to the above, officers have identified the need for a limited range of dispensations for other users / vehicle types. Where a dispensation has been granted, the Council will not enforce the relevant LTN restriction. Dispensations are proposed for the following categories:

- Blue Badge holders including SEND transport
- Rapid response healthcare providers

- Category 1 Responders under the Civil Contingencies Act 2004
- Taxis and fully accessible private hire vehicles
- Refuse collection vehicles

2.41 A notable impact of allowing exemptions to the motor vehicles prohibited restriction is that non-compliance from non-exempt vehicles tends to increase where exemptions are available. Therefore, the safety risks and diminishment of scheme benefits due to increased non-compliant vehicle traffic are key considerations when determining whether exemptions should apply. Officers consider that the right balance has been struck between responding to the legitimate needs of certain groups and organisations for more direct access and scheme objectives to keep motor traffic flows below a level that will enable existing walking, wheeling and cycling trips to be made in comfort and safety and enable people who currently make short trips by car to consider sustainable modes as a viable alternative.

Human Rights

2.42 Whilst the Streatham Hill Low Traffic Neighbourhood may potentially interfere with certain residents' human rights i.e. Article 1 of the First Protocol – the protection of the right of everyone to the peaceful enjoyment of possessions, Article 8 – the protection of the individuals' right to respect for their private and family life, their home and their correspondence, and Article 14, prohibition on discrimination, it is considered that these schemes are in the general public interest and particularly in the interests of public health and safety and the scheme has been designed so that any interference is proportionate. The equalities impact of the scheme is considered in the accompanying Equalities Impact Assessment, and summarised in section 7 of this report.

FINANCE

3.1 Expenditure

The projected cost of the proposals is set out in Table 3 below.

Table 3 - Scheme expenditure

Item	Cost (£)
Traffic Order	6,000
Total	6,000

3.2 Budget

The scheme is fully funded by the Sustainable Transport / Public Realm capital allocation agreed by Cabinet in July 2020. At the time of writing, grant funding from Transport for London has not been confirmed beyond June 22.

3.3 Income

In order to maintain access for essential traffic, the scheme will be camera enforced with Penalty Charge Notices (PCNs) issued to drivers of unauthorised vehicles passing through modal filter locations. Income generated will be used to offset maintenance costs and if a surplus does arise this will be ring-fenced to offset the Council's highway and transport-related expenditure, including in the provision of support for sustainable transport measures to the scheme areas, in line with other PCN income.

4. LEGAL AND DEMOCRACY

- 4.1 In response to the Covid-19 pandemic, on 23 May 2020 the Department for Transport issued revised [statutory guidance on councils' highway network management duty](#). It recommends that local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling as swiftly as possible. This report's recommendations are strongly aligned to this guidance.
- 4.2 The Council has, pursuant to Section 62 of the Highways Act 1980, a general power to improve any highway in its area. Section 75 of the Act extends a power to vary the relative widths of the carriageway and of any footway.
- 4.3 Restricting traffic from using part of the public highway requires the making of a traffic management order (TMO). The Council's powers to implement this are principally set out in the Road Traffic Regulation Act 1984 (RTRA). For the reasons set out in paragraphs 1 and 2 of this report, the making of Permanent TMOs pursuant to Section 6, 45, 49, 124 and Schedule 1 and Part IV of Schedule 9 of the RTRA, is recommended.
- 4.4 The provisions of sections 6, 17, 124, Schedule 1 and Part IV of Schedule 9 of the RTRA provide the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make TMOs for the purpose of:
- a) designating on-street parking places and to charge for the use of such places;
 - b) imposing waiting and loading restrictions on vehicles of all or certain classes, at all times or otherwise;
 - c) to prohibit, restrict and otherwise regulate the use of a road or any part of the width of a road by all classes of traffic, or by any class or classes of traffic, and
 - d) to vary or revoke an existing TMO for these purposes.
- 4.5 Paragraphs (a) to (g) of section 1(1) of the RTRA provides that the Council may make a TMO for any of the following purposes
- a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or
 - b) for preventing damage to the road or to any building on or near the road, or
 - c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or
 - d) for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or
 - e) (without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or
 - f) for preserving or improving the amenities of the area through which the road runs
 - g) for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality).
- 4.6 By virtue of section 122 of the RTRA, the Council must exercise its functions under the RTRA so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. These powers must be exercised so far as practicable having regard to the following matters:-
- a) the desirability of securing and maintaining reasonable access to premises.
 - b) the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.

- c) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy)
- d) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
- e) any other matters appearing to the Council to be relevant.

The Council must have proper regard to the matters set out in s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

4.7 When determining what paying parking places are to be designated on the highway, section 45(3) of the RTRA requires the Council to consider both the interests of traffic and those of the owners and occupiers of adjoining properties. In particular, the Council must have regard to

- (a) the need for maintaining the free movement of traffic,
- (b) the need for maintaining reasonable access to premises,
- (c) the extent to which off-street parking is available in the neighbourhood or if the provision of such parking is likely to be encouraged by designating paying parking places on the highway.

4.8 Section 144 of the Greater London Authority Act 1999 requires the Council when exercising any of its functions to have regard to the Mayor of London’s transport strategy and any written guidance given to it. The current strategy emphasises the importance of reducing emissions and improving air quality and at page 101, under the heading, “Improving air quality and the environment” includes the following commentary:

“Policy 6

The Mayor, through TfL and the boroughs, and working with stakeholders, will take action to reduce emissions – in particular diesel emissions – from vehicles on London’s streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures may include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/levies, responsible procurement, the making of traffic restrictions/regulations and local actions.”

The same document goes on to set out the expectation (at page 105) that:

“TfL and the boroughs...take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)”.

4.9 The making of traffic orders is governed by the Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996. Regulation 6 specifies that in addition to the Chief Officer of the Police, the Council is required to consult with the following before making a Traffic Order.

Case	Consultee
Where the order relates to, or appears to the order making authority to be likely to affect traffic on, a road for which another authority is the highway authority or the traffic authority	The other authority
Where the order relates to, or appears to the order making authority to be likely to affect traffic	London Buses

on a road included in the route of a London bus service	
Where it appears to the authority that the order is likely to affect the passage of an ambulance	the chief officer of the appropriate NHS trust
Where it appears to the authority that the order is likely to affect the passage on any road of a fire-fighting vehicle	the chief officer of the fire brigade of the fire authority
All cases	The Freight Transport Association The Road Haulage Association
Such other organisations (if any) representing persons likely to be affected by any provision in the order as the order making authority thinks it appropriate to consult.	
Any such organisations that have been consulted in respect of one or more schemes subject to this report's recommendations are detailed in section 2 of this report	

4.10 Regulation 7 provides that before making an order the Council is required to publish in a notice containing the proscribed particulars in a newspaper circulating in the area in which any road or area to which the notice relates, the London Gazette, those bodies it is required to consult under Regulation 6, and to take such other steps deemed appropriate to ensure adequate publicity of the order. Any person may object to the making of an order by the date specified in the notice of proposals or, if later, the end of the period of 21 days.

4.11 Regulation 9 (1) provides that the authority must cause a public inquiry to be held in respect of any order which has the effect of:

(a) prohibiting the loading or unloading of vehicles or vehicles of any class in a road on any day of the week—

- (i) at all times;
- (ii) before 07.00 hours;
- (iii) between 10.00 and 16.00 hours; or
- (iv) after 19.00 hours,

and an objection has been made to the order (other than one which the order making authority is satisfied is frivolous or irrelevant) and not withdrawn; or

(b) its effect is to prohibit or restrict the passage of public service vehicles along a road and an objection has been made to the order in accordance with regulation 8; or

(c) by the operator of a London bus service the route of which includes that road or by Transport for London.

4.12 For the purposes of paragraph 4.10(a) above, an order shall not be taken to have the effect of prohibiting loading at any time to the extent that it—

(a) authorises the use of part of a road as a parking place, or designates a parking place on a road, for the use of a disabled person's vehicle as defined by section 142(1) of the 1984 Act;

(b) relates to a length of the side of a road extending 15 metres in either direction from the point where one road joins the side of another road, unless the effect of the order taken with prohibitions already imposed is to prohibit loading and unloading by vehicles of any class at the time in question for a total distance of more than 30 metres out of 50 metres on one side of any length of road.

In all other cases the Council has a discretion, and “may” cause such an inquiry to be held.

- 4.13 Once the traffic order is in place, the Council is required to make any necessary amendments to the road markings and traffic signs as soon as practicable to adequately provide information as to the Order that is in place. The requisite sign or signs for these purposes is specified in the Traffic Signs Regulations and General Directions 2016.
- 4.14 Paragraph 5 of the report details the Council's communication and consultation strategy with respect to this proposal.
- 4.15 As detailed in paragraph 4.9, the Regulations specify a statutory consultation procedure which must be followed if the Council wishes to make a traffic order. This procedure requires that before making the traffic order the Council is required to publicise the proposal. Any person may object to the making of an order by the date specified in the notice of proposals or, if later, the end of the period of 21 days beginning with the date on which the order making authority has complied with all the publication requirements. Before making the traffic order, the council is obliged to consider all objections received and if a public inquiry is held, the inspectors report and any recommendations the inspector made.
- 4.16 Section 149 of the Equality Act 2010 sets out the public sector equality duty in relation to race, sex and disability and extending the duty to all the protected characteristics i.e. race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment. The public sector equality duty requires public authorities to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation
 - Advance equality of opportunity and
 - Foster good relations between those who share a protected characteristic and those who do not.
- Part of the duty to have "due regard" where there is disproportionate impact will be to take steps to mitigate the impact and the Council must demonstrate that this has been done, and/or justify the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.
- 4.17 The Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.
- 4.18 In addition to the above, Section 175A of the Highways Act 1980 extends a specific duty upon local authorities to have regard to the needs of disabled and blind in the execution of certain street works (namely the placing of lamp-posts, bollards, traffic signs, apparatus or other permanent obstructions) which may impede such persons. Consideration of this duty and the Councils' public sector equality duty are discussed in paragraph 7 below.
- 4.19 Section 16 of the Traffic Management Act 2004 imposes a duty on the Council to manage its road network with a view to achieving, so far as may be reasonably practicable having regard to its other obligations, policies and objectives, to:

- Securing the expeditious movement of traffic on the authority's road network; and

- Facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- 4.20 Subject to the requirement set out in section 18 to have regard to statutory guidance on network management, under section 17 of the Traffic Management Act the Council 2004 as a network manager must have in place arrangements as it considers appropriate for carrying out its network management duty which must include provision for establishing processes for ensuring, so far as is reasonably practical, that the Council identifies occurrences, including future occurrences which are causing or may cause road congestion or disruption to the movement of traffic, and consider possible action that can be taken in response to those occurrences.
- 4.21 The Council, as a public body, is under a duty to consider whether the exercise of its powers interacts with rights protected by the European Convention, set out in the Human Rights Act 1998. The Convention rights applicable are:
- i. Article 1, Part I - protects the right of everyone to the peaceful enjoyment of possessions. No one shall be deprived of their possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. This does not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest etc.
 - ii. Article 8 - protects the right of the individual to respect for their private and family life, their home and their correspondence. There should be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of amongst other matters, public safety, the economic well-being of the country, for the prevention of disorder or crime, for the protection of health, or for the protection of the rights and freedoms of others.
 - iii. Article 14 - prohibits discrimination so that the enjoyment of the rights and freedoms set forth in the Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

Any interference with a Convention right must be necessary and proportionate and in pursuing a traffic order, the council has to consider carefully the balance to be struck between individual rights and the wider public interest.

- 4.22 The Council's Constitution 2020-21 delegates to Business Unit Managers authority to consider and approve, within their area of managerial responsibility, the detailed delivery of local traffic and highway schemes (including controlled parking zones) which have been included within the Council's overall programme. The measures proposed by this report meet this criteria by virtue of having been included in [Lambeth's Transport Strategy Implementation Plan](#) approved by Cabinet on 17 November 2019.
- 4.23 The Council's Constitution requires that issues of an important or sensitive nature will be published on the Council's website for five clear days prior to the decision being taken (Constitution, Part 2, Section 3) by the Cabinet Member or officer concerned. It is suggested that this proposed decision is published online in the interests of transparency. Any representations received during this period must be considered by the decision-maker before the decision is taken.

5. CONSULTATION AND CO-PRODUCTION

- 5.1 The Lambeth Transport Strategy and TSIP 2019 provide the policy basis for Low Traffic Neighbourhoods in Lambeth. The Strategy achieved a high level of support from stakeholders following comprehensive engagement and consultation. Responses to the consultation showed that four out of five people agreed with the principle that we should encourage people to walk, cycle and use public transport rather than travel by car.
- 5.2 The principle of a traffic reduction scheme in the Streatham Hill area was subject to public consultation in February and March 2020 as part of wider consultation on the proposed Streatham Hill A23 corridor scheme. Due to the impact of Covid-19 and the Government directive to take urgent action to improve conditions for walking and cycling there was limited opportunity for further pre-engagement prior to introduction of the first phase of the experimental scheme.
- 5.3 The Council received a number of representations, including objections, to the experimental traffic orders comprising the trial scheme. The level of response should be considered in the context of the LTN areas being relatively large and the high level of interest in the schemes from respondents locally, across Lambeth and beyond. In total 169 objections were received to the orders within the statutory period following the introduction of 'Phase 2' of the scheme in May 2021 ('in time'). The proposed scheme traffic order process will present a further statutory opportunity to submit objections and representations.
- 5.4 Although there is no statutory requirement to consult the public on experimental traffic schemes, except to take into account responses submitted in the 6-month statutory period post-implementation, officers and members engaged with the local community throughout the process, listening to differing views on the scheme and seeking to respond to suggestions and comments in order to improve it, gathering information on equalities impacts and developing mitigations. Initially, due to Covid-19 restrictions, face to face engagement opportunities were limited, but information was provided to affected residents by letter and electronic media. Online meetings open to all were held regularly.
- 5.5 In addition to ongoing engagement, officers carried out a non-statutory public consultation on the experimental scheme with a duration of five weeks. As well as promoting an on-line survey, officers held on-street events to accept the feedback of local people, answer questions about the project, and enable people without access to the internet or who needed additional support to respond to the survey. Focused engagement activities were held with Transport for All to gather feedback from a range of disability organisation as well as disabled residents in the borough.
- 5.6 Around 2 in 5 (40%) of all respondents to the on-line survey considered that the experimental scheme represented a positive change to the local area. The full findings of the engagement and consultation are detailed in the Consultation Report at Appendix C.

6. RISK MANAGEMENT

- 6.1 The main risks associated with the proposals detailed in this report are summarised in table 6 below, along with the proposed mitigation.

Table 4 - Risk severity calculation

		Impact			
		Minor (1)	Significant (2)	Serious (4)	Major (8)
Likelihood	Very likely (4)	4	8	16	32

Likely (3)	3	6	12	24
Unlikely (2)	2	4	8	16
Very Unlikely (1)	1	2	4	8

Table 5 - Risk Assessment

Risk	Likelihood	Impact	Score	Mitigation
Potential for significant public opposition to the proposal.	3	3	9	All objections and representations will be carefully considered before a final decision on the scheme. Further engagement on complementary measures and scheme enhancements.
That objections and representations to the experimental scheme will not be properly considered, undermining faith in the process to date.	1	4	4	Statutory consultation responses already received for the experimental scheme will be presented to the decision maker in addition to any further objections / representations that are received for the proposed scheme. Consultation report to be published with this report.
That the scheme disproportionately disbenefits a group with protected characteristics.	2	4	8	An updated equalities impact assessment has been carried out and the council has agreed a range of measures to address impacts, including through the LTN Exemptions Policy which will be applied to the proposed scheme.

7. EQUALITIES IMPACT ASSESSMENT

- 7.1 In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, the Public Sector Equality Duty has been discharged with respect to the relevant protected characteristics (age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation).
- 7.2 The Transport Strategy and TSIP 2019 was subject to a full Equalities Impact Assessment (EqIA). This identified broadly positive impacts on protected groups.
- 7.3 An Equality Impact Assessment (EIA) has been completed for this scheme and decision. The Streatham Hill LTN EIA covers;
- The changes proposed with the scheme

- What we know about the people who will be impacted by the changes
- How we anticipate people will be impacted by the changes
- How we plan to promote and deliver any positive impacts of the scheme
- How we plan to address and mitigate any negative impacts of the scheme
- How we will review/evaluate our proposal, mitigating actions and/or benefits and who will be responsible for this

- 7.4 Positive impacts are identified for children and older people, although the Council has received feedback about the experimental scheme relating to the impact on young people walking to school on roads where traffic has increased and this should be investigated further. The proposed scheme is expected to have a potential benefit for disabled people in helping to deliver a more equitable street environment, but also a potentially negative impact for those reliant of driving / being driven, as discussed below. Positive impacts relating to health are identified in the form of walking and cycling benefits, but if traffic increases on some roads this may result in localised air quality impacts and increased stress relating to congestion. Scheme related environmental improvements are assessed to have a benefit in terms of Pregnancy and Maternity, although again there are some potential negative impacts were identified on supporting service response times, such as community midwives. In terms of Race and Ethnicity, positive impacts were identified due to reduced exposure to transport related harmful impacts, but potential disbenefits in terms of servicing of businesses. In terms of Sex, benefits are identified for women who are less likely to have access to a car and more likely to have safety concerns about cycling. On the other hand, feelings of insecurity / personal safety are identified as negative impacts. In terms of socio economic status, low income households are considered to benefit as they are more reliant on non-car modes. Evidence is identified that an improved environment for walking, cycling and public transport is likely to benefit local businesses, but as above longer routes for servicing are identified as a negative impact. The full assessment describing equalities impacts and mitigations is attached to this report as Appendix B.
- 7.5 In developing the scheme EqIA, officers have carefully considered the considerable amount of feedback received during the engagement process on the experimental scheme described in Section 5. In particular, specific feedback was received from disabled people and this has been incorporated into the EqIA and consideration of the need for dispensations. Building on feedback received directly from disabled people, the Council has worked with the charity Transport for All to help gain a more in depth appreciation of the travel needs of disabled people and how they may be impacted by LTNs and this is set out in the assessment.
- 7.6 The Council's agreed LTN Exemption Policy is rooted in an acceptance that, for some disabled people, travel by motor vehicle is an essential need. The policy will be applied to the proposal and means that disabled people who hold Blue Badges will be eligible to receive a dispensation to drive, or be driven through a specified modal filter. Through analysis of feedback received and assessment of journey time differentials for a range of identified and potential trips, officers have concluded that a significant impact on journey times, which may have a disproportionately negative impact for some disabled people, is only likely to occur for relatively short journeys. Further analysis suggests that journeys of this type may be frequent and regular, often repeated trips to the same location, for healthcare purposes for example.
- 7.7 For longer trips, across the borough for example, any journey time differential resulting from the LTN scheme is not assessed as being significant. By allowing Blue Badge holders (living anywhere in the borough) to receive a dispensation to allow them to pass through a specific modal filter it is considered that the journey time penalty for some shorter journeys by car can be alleviated. A broader dispensation, for example from all modal filters in all LTNs, has been considered, but granting a significant level of exemptions and dispensations has the potential to undermine the

legibility of the schemes and encourage greater levels of non-compliance as well as having potential safety impacts. The limited dispensation proposed is considered to address the needs identified through the EqlA process, however this will be kept under review. A registration process for users who wish to benefit from a dispensation is a necessary requirement given that Blue Badge holders cannot be immediately identified by vehicle type or registration. Officers will work with disabled groups to ensure that this process is easily accessible, and that appropriate support is provided where necessary.

- 7.8 Again, rooted in the equalities analysis carried out a dispensation is proposed for taxis and fully accessible private hire vehicles. This is in recognition of the important role these services can provide as a valuable mobility option for disabled people. The availability of taxi services can also help address concerns about personal safety that have been expressed during scheme engagement. As requested by the taxi trade, the dispensation will be applied in cases where modal filters allow bus services to pass through, as is the case for the filter on Downton Avenue in the proposed scheme area.
- 7.9 As well as a dispensation for individual Blue Badge holders, this will also be available to organisations which hold a Blue Badge, SEND transport providers for example. This dispensation covers all LTN restrictions across the borough given that these vehicles need to traverse back and forth to multiple locations where service users are located.
- 7.10 Feedback from disabled people and representative groups in relation to the experimental scheme has also highlighted the pressing need to make streets and spaces more accessible so that the benefits of LTNs can be shared by all. Walking is the most common mode for disabled Londoners³. Disabled people are less likely to have access to a car than the general population and therefore more likely to depend on walking, wheeling or cycling to make essential trips. LTNs have the potential to improve the everyday experience of disabled people significantly, but only if the street environment is made fully accessible to them. Officers have worked together with Transport for All to conduct street audits of the scheme area in order to identify defects and priorities for improvement.
- 7.11 The EqlA also identifies a range of other mitigations / improvements, including continuing community involvement in street design, further monitoring, improved communications, improvements to boundary roads and support for behaviour change to active travel modes.
- 7.12 The analysis within the EIA does not identify any significant equalities impacts for the proposed scheme. However, ongoing monitoring of the scheme will be important to help identify any potential negative impacts arising from during the trial period.

8. COMMUNITY SAFETY

- 8.1 The underlying objective of a low traffic neighbourhood is to create a healthier and safer environment in which to live and travel. The specific traffic management measures proposed have been developed in consultation with the police and the Councils' Safer Streets' team. The project team will continue to gather information about any unintended consequences of low traffic environments on perceptions of personal safety at certain locations. Ongoing collaboration with council services such as community safety and regeneration will be required to deliver balanced outcomes that help people feel safer in general and not just from the danger of vehicle traffic. The highways team will respond to situations where street lighting levels are reported to be low.

³ <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

- 8.2 In order to ensure that responses to emergencies are not hindered by any increase in journey length or duration, the proposed approach to dispensations includes Category 1 Responders under the Civil Contingencies Act 2004.
- 8.3 More people may be encouraged to walk and cycle if they perceive these ways of travelling to be safe, bringing environmental and health benefits. Road safety interventions can unite communities by making roads more like places and less like routes and promote social inclusion. Recent academic research suggests a correlation between reduced traffic in LTN areas and a reduction in traffic related casualties, particularly pedestrian casualties – see Section 2.
- 8.4 As discussed in Section 5, a number of representations, including objections to the experimental scheme traffic orders were submitted to the Council with reference to the impact of LTNs on personal safety. Some respondents have reported that quieter streets as a result of low levels of motor traffic led to increased feelings of insecurity / actual safety. While evidence suggests LTNs result in a reduction in street crime⁴ and officers consider that LTNs are likely to have increased ‘passive surveillance’ overall due to measured increases in cycling and expected increases in walking levels, 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. A key principle of LTNs is that residents should feel a sense of ownership and pride in their neighbourhood and involving the community in the design of street will be important in understanding feelings of insecurity and how these can properly be addressed.

9. ORGANISATIONAL IMPLICATIONS

9.1 Environmental:

The proposed measures are expected to deliver environmental improvements by ensuring that traffic levels in neighbourhood areas are not excessive and that more people are able to choose non-polluting modes of travel. Associated public realm works are also expected to deliver environmental benefits, for example in the provision of Sustainable Urban Drainage (rain gardens) and bio-diverse planting.

A full Strategic Environmental Assessment was carried out for the Transport Strategy and Implementation Plan which includes Low Traffic Neighbourhoods. The SEA Environmental Report concluded that no significant adverse environmental effects would result from the implementation of the Strategy. As such, no specific recommendations for the mitigation of effects were required. All the effects identified were either considered to have no impact or to be positive.

In creating an environment which enables active travel and discourages use of motor vehicles, the scheme objectives are strongly aligned to the Lambeth Air Quality Action Plan, the Health and Wellbeing Strategy and the 2019 Cabinet resolution relating to the climate emergency. Since private transport comprises a large portion of the UK’s energy consumption and carbon emissions (direct and embedded in manufacture), reducing private vehicle ownership and use on a wide scale is an essential adaptive measure. The proposals encourage alternative modes of low carbon transport such as walking, wheeling, scooting, and cycling that could support a significant borough wide reduction in private vehicle use.

⁴ [The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London | Published in Findings \(findingspress.org\)](#)

In restricting how drivers and motorcyclists can access the highway network, some local journeys that are made using these means of travel may take longer, thereby increasing those journeys' carbon footprint and amount of pollution. Overall, however, monitoring of the schemes has shown a reduction in motor traffic volumes across the affected areas and this reduction is considered to offset any increase in the length of existing trips. Once the schemes become established it is expected that behaviour changes will result in further reductions in car ownership and use leading to increased environmental benefits.

Low Traffic Neighbourhoods are an important part of a wider strategy to reduce the level of motor traffic in the borough as expressed in the Transport Strategy. Some increase in traffic on adjacent roads, mainly classified roads, has been recorded as part of monitoring of the LTN schemes and a strategic demand management and fleet upgrade approach is required to ensure that any environmental impacts on roads which are designed to carry more traffic are mitigated. Officers are working closely with TfL and other partners to promote and enable a switch to cleaner vehicles, the provision of better facilities for walking, cycling and buses on key corridors and other initiatives that can reduce demand for travel by motor vehicles.

9.2 Health

Protecting public health is at the heart of the proposals. In addition to improving air quality in the neighbourhood scope area where motor vehicle traffic is reduced, physical and mental health benefits are expected for those who increase their daily physical exercise via active travel. LTNs are expected to help the borough achieve Mayor's Transport Strategy objective of increasing the proportion of residents doing at least two x 10 minutes of active travel a day.

At a small number of locations where traffic volumes have increased air pollution concentrations are also modelled to have increased, which may have local negative health impacts for some people. The assessment carried out however does not identify any significant air quality impacts at sensitive locations following the implementation of the LTN schemes. Officers have identified suitable improvement measures to tackle locations where traffic volume increases have been recorded and the delivery of these will be accompanied by continued scheme monitoring.

The Council commissioned an independent review of air quality impacts in relation to the experimental scheme. This assessment used the established traffic data baseline and subsequent traffic surveys to model the air quality impact based on traffic flows and taking into account a range of other factors, such as topography. The review then considered any impacts, the scale of impact, how locations defined as sensitive, e.g. schools, are affected and air quality levels in absolute terms and in relation to standards / health guidelines. A modelling approach has the advantage of being able to take a wide variety of factors into consideration and was necessary in this case due to the lack of baseline air quality measurement data in the scheme area. The following high-level findings were noted (Further detail is provided in Appendix E):

- Some increase in emissions on boundary roads where traffic flows have increased
- No significant impacts on NO₂, PM_{2.5} or PM₁₀ at any sensitive receptor site - including those on the boundary of the LTN
- A slight negative impact was recorded at Magnolia Court and Leigham Lodge on Leigham Court Road
- Negligible impact at all sensitive receptor sites on the South Circular (A205)
- No locations where air quality breached legal limits for the first time following the introduction the scheme

As part of the ongoing commitment to assess impacts on air quality, lightweight air quality monitors will be installed on the South Circular and other key locations. Data from these monitors will include air quality when traffic flows are highest and be used to inform mitigations.

9.3 Corporate Parenting

None arising from this report’s recommendations

9.4 Staffing and accommodation:

None arising from this report’s recommendations.

9.5 Responsible Procurement:

None arising from this report; all goods and services will be provided by the council’s existing supply chains.

10. TIMETABLE FOR IMPLEMENTATION

10.1 Table 7 below shows expected delivery milestones associated with the proposals included within this report. Note that the proposed dates are indicative and for information purposes only.

Table 7 - Implementation timetable

	Activity	Proposed Date	Actual Date
1	Publish CMDDR	May 22	27.05.22
2	Traffic order consultation	June 22	
3	Objection report	July 22	

AUDIT TRAIL				
Consultation				
Name and Position/Title	Lambeth Directorate	Date Sent	Date Received	Comments in paragraph:
Cllr Rezina Chowdhury	Cabinet Member for Sustainable Lambeth and Clean Air	26.05.22	26.05.22	
Bayo Dosunmu, Strategic Director Resident Services	Resident Services	11.05.22	12.05.22	
Neil Fenton, AD Parking, Street Management & Commercial	Resident Services	08.04.22	20.04.22	
Venetia Reid-Baptiste, Director Environment and Streetscene	Resident Services	08.04.22		
Russell Trewartha, Head of Programmes (Capital Programme for Public Realm)	Resident Services	08.04.22	12.04.22	
Michael Munnely, Assistant Director: Infrastructure, Environment, Public Realm & Climate Change Delivery	Resident Services	08.04.22		
Marianna Ritchie, Democratic Services	Legal and Governance	08.04.22	12.04.22	1
Hannah Jameson, AD for Sustainable Development and Climate Change Response	Sustainable Growth and Opportunity	08.04.22		
Rob Bristow Director of Planning, Transport and Sustainability	Sustainable Growth and Opportunity	08.04.22		
Gregory Carson, Principal Lawyer	Legal and Governance	08.04.22	25.04.22	1, 4
Matthew Gaynor, AD Finance (Capital Planning and Major Projects)	Finance	08.04.22	08.04.22	
Bala Balaskanthan, Traffic Manager	Resident Services	08.04.22		
Rachel Sandbrook, Head of Highways	Resident Services	08.04.22		
Jonathan Pook, Head of Parking & Highways Enforcement Environment & Streetscene	Resident Services	08.04.22		

Ben Stevens Highway Network Manager	Resident Services	08.04.22		
David Eaglesham, Acting Head of Service Development & Street Management	Resident Services	08.04.22	11.04.22	2

Report History	
Original discussion with Cabinet Member	26 May 2022
Report deadline	27 May 2022
Date final report sent	27 May 2022
Part II Exempt from Disclosure/ confidential accompanying report?	N/A
Key decision report	Yes
Date first appeared on forward plan	25 April 2022
Key decision reasons	Meets community impact test
Background information	<ol style="list-style-type: none"> 1. Lambeth's Transport Strategy Implementation Plan 2. C-19 Transport Covid Programme 3. Statutory guidance in relation to the effect of Covid-19 on highway network management 4. Lambeth's Air Quality Action Plan 5. Streatham Hill LTN - Phase 1 decision report 6. Streatham Hill LTN - Phase 2 decision report 7. Low Traffic Neighbourhoods Monitoring Strategy 8. Streatham Hill LTN Stage 2 Monitoring Report 9. Streatham Hill Air Quality Assessment 10. Lambeth Climate Action Plan
Appendices	<p>Appendix A: Traffic Restrictions Drawings A.1 to A.8</p> <p>Appendix B: Scheme Equalities Impact Assessment</p> <p>Appendix C: Consultation Report</p> <p>Appendix D: Monitoring Report</p> <p>Appendix E: Air Quality Assessment</p> <p>Appendix F: Exemptions Policy</p>

APPROVAL BY CABINET MEMBER OR OFFICER IN ACCORDANCE WITH SCHEME OF DELEGATION

I confirm I have consulted Finance, Legal and Democratic Services, and taken account of their advice and comments in completing the report for approval:

Signature: _____ **Date:** _____

Post: Simon Phillips, Head of Transport Strategy and Programmes

I approve the above recommendations:

Signature: _____ **Date:** _____

Post: Cllr Rezina Chowdhury, Cabinet Member for Sustainable Lambeth and Clean Air

Any declarations of interest (or exemptions granted): None

Any conflicts of interest: None

Any dispensations: None