



TRANSPORT STRATEGY SERVICE

LOUISE MCBRIDE

PROOF OF EVIDENCE

FOR PUBLIC INQUIRY COMMENCING ON 10th OCTOBER 2017

SITE

The scheme is located on the Torrington Place / Tavistock Place Corridor, between the junctions with Tottenham Court Road and Judd Street

SUBJECT OF PUBLIC INQUIRY

The Camden (Torrington Place to Tavistock Place) (Prescribed Routes, Waiting and Loading Restrictions and Loading Places) Traffic Order [2017]

PLANNING INSPECTORATE REFERENCE:

DPI/X5210/17/8

CAMDEN REFERENCE:

SC/2017/04

Introduction

- i. I, Louise McBride, have prepared this proof of evidence for presentation at the Public Inquiry into the Tavistock Place / Torrington Place trial traffic scheme ('the Trial') and whether any disadvantages which could arise from the scheme would be outweighed by the advantages. I hold a BSocSc degree in Geography and Planning from the University of Birmingham and a Master's degree in Transport Planning and Management from the University of Westminster. I am Head of Transport Strategy at the London Borough of Camden where I have worked since September 2008. Prior to this, I worked for Westminster City Council.
- ii. My proof concentrates on the background to the scheme, the rationale for its implementation including the policy justification, the effects of the scheme on pedestrians, cyclists and motor traffic, consideration of the needs of protected groups, the engagement and consultation process undertaken and the Council's response to objections received when the intention to make the traffic order permanent was advertised.
- iii. This statement is true to the best of my knowledge and belief. I can confirm that the views expressed are my true and professional opinion.
- iv. **Structure of this proof**

My evidence will be divided into seven sections:

- Section 1 (**Background**) sets out the background to the scheme including the project objectives.
- Section 2 (**Legislation and Policy**) covers national, regional and local transport policies and guidance, and legislation that underpins the design and implementation of the trial traffic scheme.
- Section 3 (**Effects of the Scheme**) outlines the effects of the scheme on pedestrians, cyclists and general traffic.
- Section 4 (**Consultation and Engagement**) sets out the consultation and engagement carried out in relation to the scheme, the comments received and the Council's response.

- Section 5 (**Objections to the intention to create a permanent traffic order**) sets out the objections received and the Council’s response.
 - Section 6 (**Conclusion**) summarises the arguments made in this proof of evidence.
- v. My colleague Simi Shah addresses the detail of the design, other options considered assessed and traffic modelling information. My colleagues Jason Strelitz and Adam Webber will be dealing with the public health and air quality aspects of the Trial in their Proofs of Evidence. David Carter and Tony Dichev address traffic modelling aspects.

1. BACKGROUND

- 1.1 The Torrington Place / Tavistock Place route (‘The Corridor’) is located in the Bloomsbury and King’s Cross wards. Document CD4/1 shows the location of the Trial. There is a range of land uses along the Corridor, including residential, offices, retail, community facilities (such as the Camden Chinese Community Centre) and universities. In addition, in the wider, surrounding area there are also medical institutions and attractions such as the Foundling Museum and Coram’s Fields.
- 1.2 The Corridor forms part of an important east / west cycle link connecting Marylebone, Fitzrovia, Bloomsbury, Kings Cross and Angel. Prior to November 2015, the street layout was a two-way segregated cycle lane on the northern side of the street, with narrow pavements and a traffic lane in each direction. There was significant pedestrian and cycle demand along The Corridor, which was expected to increase as a result of future population growth, new employment and development in the area.
- 1.3 The status of the corridor, according to Camden’s Street Gazetteer (see CD5/5) is that it is a local road. The Corridor is also identified as an emergency route in figure 2.12 in the Camden Transport Strategy (CTS) (see CD3/1). Most emergency routes are located on roads defined as ‘Metropolitan’ and ‘Major’

roads, but some are on district (minor local distributor) roads, as in the case of Tavistock Place. These routes have no formal status, but have been informed by locations of fire, police and ambulance stations, hospitals and key/frequent call-out destinations. The main purpose identified in the CTS is for consideration of appropriate traffic engineering approaches - such as avoidance, where possible, of vertical traffic calming. This would include, for example, speed humps which could have the effect of slowing emergency vehicles.

Scheme Rationale

- 1.4 The previous layout did not provide sufficient capacity for the numbers of people who wished to cycle because the bidirectional track was narrower than the current recommended minimum width. During peak times there were regularly queues of cyclists that extended between junctions, and the narrow cycle lanes made it difficult to safely overtake for all users but especially for those using adaptive cycles.
- 1.5 A Cycling Level of Service (CLoS) assessment of the previous layout resulted in a poor CLoS score of 20, further highlighting that improvements for cycling along the Corridor were required. Please see CD2/9 for London Cycle Design Standards, which includes the CLoS. Further detail of the CLoS assessment is provided in Simi Shah's Proof of Evidence.
- 1.6 The previous road layout with a two-way protected cycle track and a traffic lane in each direction also did not provide a safe and attractive environment for the large number of people walking in the area.
- 1.7 Pedestrian Comfort Level (PCL) assessment highlighted areas of insufficient footway width along the corridor. The narrow footways combined with the bidirectional cycle track resulted in an uncomfortable pedestrian environment and one in which pedestrians did not always anticipate two-way cycling on the northern kerbside in addition to two-way vehicular traffic. Collision records from before the Trial indicate that some pedestrian-cyclist collisions appear to have

been a result of pedestrians stepping out into the cycle track (see Section 3 Effects of the Scheme for further detail). The route also suffered from a poor collision record relating to collisions between motor vehicles and both cyclists and pedestrians. Please see CD2/8 for the PCL Guidance. Further detail of the PCL assessment is provided in Simi Shah's Proof of Evidence.

- 1.8 The Trial was introduced to address safety concerns along the Corridor and to improve provision for cyclists. Consideration was already being given to a scheme along the lines of the Trial and, as part of the approval for the West End Project (WEP), the Council agreed to bring forward the Trial. This was to respond to comments made as part of the public consultation on the WEP and mitigate the predicted impact of the WEP scheme on Torrington Place.

Objectives

- 1.9 Due to the high use of the route by cyclists, there were a number of concerns associated with the pre-trial layout on the Corridor. The trial was developed to address these problems:
 - a) The two-way cycle track was too narrow to cope with the volume of cyclists using the route and as a result, there was over-crowding, instances of collisions between cyclists, and observed and reported near misses. Thus, it was likely that the existing width of the cycle track was discouraging more people from cycling. The Trial was intended to make cycling along the Corridor safer and less stressful, thereby making it accessible to more people, of all ages and abilities.
 - b) Further, the pre-Trial road layout did not provide a safe and attractive environment for the large number of people walking in the area and had a poor casualty record, as set out in the Council's July 2015 decision report (see CD6/1). The Trial was intended to improve the environment for pedestrians, making the street more intuitive to navigate, and easier to cross.

- c) Finally, as part of the approval for the WEP, centred around Tottenham Court Road, the Council decided to bring forward proposals for the Trial which were already in development, as it was felt that the Trial layout would help to reduce the anticipated effects of rerouting traffic.

1.10 While issues with the cycle route had already been identified, the approval of the WEP provided the impetus to bring forward a trial to reduce through motor traffic on the Corridor, which was implemented through an experimental traffic order (ETO) in November 2015. It removed motor traffic in the westbound direction along the Corridor and made provision for a cycle lane in each direction on each side of the street ('The Trial').

1.11 In September and October 2016, the Council consulted on the possibility of making the temporary traffic changes permanent (with potential additional improvements, such as wider pavements, stepped cycle tracks and tree planting), Over 15,000 responses were received and 79% supported making the temporary traffic changes permanent.

1.12 As the ETO was to reach the end of its duration in Autumn 2016 and following analysis of the significant number of consultation responses, a decision was needed as to whether steps should be taken towards making it permanent. The alternative to this would have been to allow the Order to lapse and have the street returned to its pre-Trial layout (with or without further proposals for an alternative future layout).

1.13 A report (see CD6/2) was considered by the Council's Cabinet at its meeting on 22 February 2017. Members of the public and organisations were given the opportunity to make a deputation in support of or against the scheme and recommendations in the report. Four deputations were heard at the meeting from the following: the Bloomsbury Residents' Action Group (BRAG), the Licensed Taxi Drivers Association (LTDA), London Cycling Campaign (LCC) and the Camden Cycling Campaign (CCC).

1.14 The Council's Cabinet agreed that:

- a) The Council would maintain the ETO relating to the Corridor, keeping the Trial layout as it is, and take steps to progress towards making it permanent. The Cabinet would not make a final decision as to whether to make it permanent, until a further report from officers had been received.
- b) A public inquiry would be held to further examine the merits of the scheme.
- c) Once the public inquiry had been held, Cabinet would be asked to look again at the scheme, taking into account the report of the Inquiry Inspector, and then to decide whether to maintain or remove it, and, if they do maintain it, whether to make any improvements to it.
- d) Subject to the decision made by Cabinet, a permanent traffic order (PTO) would be progressed.

2 LEGISLATION AND POLICY

- 2.1 Key legislation and policies which led to the Council's Cabinet agreeing the recommendations are set out below and in the report considered by Cabinet in February 2017.
- 2.2 The Trial furthers the aims and objectives of the Council's approved plans and strategies. It also aligns with national and Mayoral plans and policies relating to transport, health, the environment and urban planning.

Statutory Duties/Legislation

- 2.3 In summary, the Council has a duty under section 122 of the Road Traffic Regulation Act 1984 ("RTRA 1984") (see CD1/22), so far as practicable, to exercise its functions under that Act to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians and cyclists) and the provision of suitable and adequate parking facilities on and off the highway. In performing this duty the Council must have regard to:
 - a) the desirability of securing and maintaining reasonable access to premises;

- b) the effect on the amenities of any locality affected (including 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;
- c) the 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; and
- e) any other matters appearing to the authority to be relevant.

2.4 Under section 39 of the Road Traffic Act 1988, the Council is required to prepare and carry out a programme of measures designed to promote road safety, to carry out studies into collisions arising out of the use of vehicles, to take such measures as appear to the Council to be appropriate to prevent such accidents, including giving training and advice and other measures taken in the exercise of its powers for controlling, protecting or assisting the movement of traffic on roads.

2.5 A traffic regulation order may be made where it appears to the authority to be expedient to make it for one or more of the purposes set out in the RTRA 1984: (see the summary of those provisions below). Officers consider that, having regard to section 122 of the RTRA 1984, it would be expedient to progress the recommended Order for the following purposes set out or referred to in section 1 of that Act:

- a) for avoiding or preventing danger to persons or other traffic using the road;
- b) for facilitating the passage on the road of any class of traffic (including cyclists and pedestrians);
- c) for preventing vehicular traffic using the Corridor, or using it in a manner which is unsuitable having regard to the existing character of the road;
- d) for preserving the character of the road where it is specially suitable for use by persons on foot;

- e) for preserving or improving the amenities of the area through which the road runs; and
- f) for improving air quality in the borough by, among other measures, implementing the Council's Clean Air Action Plan.

2.6 The Council also has a responsibility under the Environment Act 1995 to take steps to reduce air pollution. Within the overarching framework of the EU Air Quality Directive (2008), the Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets out UK air quality standards and objectives for reducing levels of health-threatening pollutants (see Appendix 1 Table A of Adam Webber's Proof of Evidence). Following direction from the courts, central Government consulted on and published a new UK Plan for tackling roadside nitrogen dioxide concentrations in July 2017. The Air Quality Directive sets limits and targets for concentrations of pollutants in outdoor air for the protection of human health and ecosystems. As is the case for much of central London, the EU objectives for nitrogen dioxide (NO₂) are exceeded within Camden. Although currently meeting EU objective levels for particulate matter (PM), Camden continues to work to reduce levels of these pollutants, as the World Health Organisation's health-based limits indicate that there is no safe level for particulates (see Adam Webber's Proof of Evidence).

2.7 As NO₂ objectives are not met within Camden, in 2000 the whole of the Borough was designated an Air Quality Management Area (AQMA). This requires the Council to take action to reduce air pollution, and to monitor pollution levels across the Borough. As a result, the Council has a Clean Air Action Plan (see CD3/4), which is regularly updated and which currently contains over 65 actions aimed at reducing air pollution, including actions to reduce emissions from road transport sources and to encourage modal shift.

2.8 Transport accounts for around a quarter of UK greenhouse gas (GHG) emissions (as well as affecting air quality at the roadside), so schemes such as the Trial, which promote cycling and walking for transport, meet the objectives

of the Climate Change Act 2008, part of the UK government's plan to reduce greenhouse gas emissions.

- 2.9 The Council has an overarching obligation to comply with duties under the Equality Act 2010 (CD1/19), in particular the public sector equality duty under section 149 and the duty under section 29 not to discriminate when providing a public service and to make reasonable adjustments.
- 2.10 In summary, section 149 of the 2010 Act requires the Council, when exercising its functions, to have 'due regard' to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (which includes conduct prohibited under section 29);
 - Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
 - Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).
- 2.11 The section 149 duty is not a duty to achieve the objectives or take the steps set out in section 149. Rather, the section 149 duty is a duty to bring these objectives relating to discrimination into proper consideration when carrying out its public functions.

National policies

- 2.12 With regard to national transport policy, the government is encouraging more people to cycle more safely and more often. It seeks to normalise walking and cycling, seeing them as transport modes in their own right and an integral part of the transport network, and aims to make them the natural choices for shorter journeys (and as part of longer journeys). To this end the Department for Transport recently published a Cycling and Walking Investment Strategy (April 2017) (CD1/5), which sets out a long-term vision for walking and cycling to 2040, as well as evidence-based guidance on Local Cycling and Walking Infrastructure Plans (CD1/13). These set out the health, economic and

environmental benefits of more cycling and walking, (including better air quality) and urge local authorities to create safe, attractive environments that promote these modes. The DfT guidance points out that:

international evidence shows a consistent and strong correlation between comprehensive infrastructure provision to segregate cyclists from heavy and fast traffic and high levels of cycling

2.13 Other relevant national policy, in place when the Trial was implemented in November 2015, includes the draft National Cycling Delivery Plan (2014) (CD1/12). This was a 10 year strategy setting out how the government planned to increase cycling across England. It included an ambition to double cycling levels by 2025. The delivery plan featured a number of actions to meet these targets including plans for:

- a) infrastructure developments
- b) cycle-proofing roads
- c) wider transport infrastructure
- d) facilitating behaviour change across the country by promoting cycling and walking as alternative sustainable travel modes

2.14 Health policy will be covered in more detail in the proof of evidence from my colleague Jason Strelitz, but relevant national policy and guidance includes:

- a) Public Health England: *Working Together to Promote Active Travel A briefing for local authorities* (2016) (CD1/1). This briefing for transport planners and public health practitioners sets out the benefits of increasing physical activity through active travel. It points out that while motorised road transport has a role in supporting the economy, a rebalancing of our transport system is needed to create conditions which facilitate more journeys by cycling and walking to improve health, quality of life and the environment, and local productivity, while at the same time reducing costs to the public purse. It points to substantial 'win-wins' that benefit individual people and the community as a whole.

- b) Public Health England (Healthy People, Healthy Places Programme): *Everybody active, every day: a framework to embed physical activity into daily life* (2014) (CD1/2) and *Obesity and the environment briefing: increasing physical activity and active travel* (Nov 2013) (CD1/3). This guidance and summary of evidence for local authorities points out that creating a physical environment where people actively choose to walk and cycle as part of everyday life is cost effective, can have a significant impact on public health and may reduce inequalities in health. It is an essential component of a strategic approach to increasing physical activity.

2.15 Air Quality policy is dealt with in more detail in my colleague Adam Webber's Proof of Evidence. However, the Government's recent 'UK plan for tackling roadside nitrogen dioxide concentrations' (CD 1/4) states that:

"Road transport is still by far the largest contributor to NO₂ pollution in the local areas where the UK is exceeding limit values...The solution involves effective and appropriately targeted actions to:

- a. reduce emissions of NO_x from the current road vehicle fleet in problem locations now, including through promoting public transport, cycling and walking; and*
- b. accelerate road vehicle fleet turnover to cleaner vehicles to ensure that the problem remains addressed and does not move to other locations"* (paragraph 49).

Mayoral policies

2.16 Camden's strategy and policies are consistent with London Mayoral policies such as A City for all Londoners (Oct 2016) (CD2/4), the draft Mayor's Transport Strategy (2017) (CD2/1), and the draft London Environment Strategy (2017) (CD2/2) as well as the previous Mayor's policies and strategies. Key documents in this respect are the Mayor's Transport Strategy (2010) (CD2/5) and the Mayor's Vision for Cycling in London (2013), which sought to deliver 'safer streets for the bike.....more Dutch-style, fully-segregated lanes and junctions;

more mandatory cycle lanes, semi-segregated from general traffic...' (see p 9 CD2/6).

- 2.17 The current Mayor's draft Transport Strategy (MTS) (CD2/1), published in June 2017, sets out a vision to:

'create a future London that is not only home to more people, but is a better place for all of those people to live in' (pg. 17).

- 2.18 Further:

'the success of London's future transport system relies on reducing Londoners' dependency on cars in favour of increased walking, cycling and public transport use' (pg. 17).

- 2.19 London must become a city where walking, cycling and public transport become the most appealing and practical choices for many more journeys. These active and sustainable transport choices support the health and wellbeing of individual Londoners, but also the city as a whole, by reducing congestion and providing the most efficient use of valuable street space. This will help to make London a more prosperous and attractive city.

- 2.20 Addressing car dependency necessitates a focus on streets and how they are planned. In London, streets make up 80% of public space, so they need to fulfil many more functions than simply facilitating the passage of motor traffic from A to B. At the heart of the Mayor's Transport Strategy is the 'Healthy Streets' framework – a list of 10 key outcomes which all transport schemes should seek to deliver and against which all schemes submitted to Transport for London will be assessed. Further information relating to Healthy Streets can be found in the 'Healthy Streets for London' document (CD2/3). Together, these policy documents will help to ensure that all transport decisions prioritise human health and quality of life. In this context, the Mayor outlines policies to make London a city where people choose to walk and cycle more often by improving street environments for these modes (Policy 1 of the MTS), and transforming

the experience of walking and cycling by reducing the dominance of vehicular traffic (Proposal 2). The MTS sets out that the Mayor will work with TfL and boroughs to deliver a London-wide network of cycle routes with the aim that 70% of Londoners will live within 400 metres of a high quality, safe cycle route by 2041 (Proposal 3).

- 2.21 In this context, the MTS establishes a target for modal shift, seeking an increase from 64% of all daily trips made by sustainable modes (walking, cycling and public transport) in 2015 to 80% by 2041, with a corresponding decrease in the use of unsustainable modes – private vehicles, taxis and private hire vehicles.
- 2.22 Concerns about the quality of London’s air and its impact on public health are well-documented. The current mayor is introducing a toxicity charge (T-charge) in October 2017 and is bringing forward and expanding the Ultra Low Emission Zone (ULEZ) initiated by the previous mayor. Mayor’s Air Quality funding has been made available to expand cycling and walking infrastructure in London, recognising its potential to encourage the switch from motorised modes for short journeys. The Proof of Evidence of my public health colleague, Jason Strelitz, supports retention of the trial layout on grounds of public health, citing academic research and policy relating to the health and air quality benefits associated with high quality infrastructure designed to encourage modal shift.

Local Policies and Guidance

Camden’s Transport Strategy (CTS) (CD3/1)

- 2.23 Camden’s Transport Strategy sets out the transport challenges in the borough and outlines a range of policies and actions to address them. The strategy seeks to encourage sustainable and active modes of transport and to reduce the harmful effects of motor traffic on people and the environment.
- 2.24 Addressing the negative impacts of transport and the health challenges that they pose is a priority for the Council. Motor transport has negative effects on the health and well-being of current and future residents and on people who work in and visit the borough - through, for example, carbon emissions, air

pollution, noise and road traffic collisions. At the same time, heavily trafficked, polluted streets and the perception of road danger deter people from sustainable, active travel such as walking and cycling. Motor traffic does not make efficient use of limited carriageway space, so non-essential vehicle journeys contribute to congestion and negatively affect businesses and the economy through delays to journey times for freight and servicing. Further, traffic dominance undermines the economic vitality of our town centres, key destinations and business districts, by making public spaces unattractive, dirty and uncomfortable. In particular, more vulnerable people, such as older people and those with disabilities, can be deterred from using streets due to a perception of danger, making them less accessible and undermining social cohesion. Unless action is taken, these problems will increase as London grows.

2.25 To address these issues, two key objectives of the Camden Transport Strategy are to:-

- a) Reduce motor traffic levels and vehicle emissions to improve air quality, mitigate climate change and contribute to making Camden a 'low carbon and low waste borough' (Objective 1) and
- b) Encourage healthy and sustainable travel choices by prioritising walking, cycling and public transport in Camden (Objective 2)

2.26 Further, other objectives of the CTS that the Trial contributes to achieving are:

- Improve road safety and personal security for people travelling in Camden;
- Effectively manage the road network to manage congestion, improve reliability and ensure the efficient movement of goods and people;
- Develop and maintain high quality, accessible public streets and spaces and recognise that streets are about more than movement.

2.27 In addition, Policy 1.3 of the Camden Transport Strategy refers to a road user hierarchy, which identifies pedestrians and cyclists as the priority road users. This hierarchy provides a framework to aid decision making on which transport modes should receive priority consideration when reconciling the competing

demands for very limited road space. The hierarchy is intended as a guide and schemes should still be assessed on a case by case basis.

Camden Plan (CD3/2)

2.28 The Camden Plan is the Council's five year vision for the borough and sets out how the Council wants to make Camden a better borough by 2017. The Camden Plan has five strategic objectives, which the Trial contributes to meeting including:

- creating conditions for and harnessing the benefits of economic growth, by supporting growth in numbers of cyclists and pedestrians resulting from both local development and institutional expansion, and growth in the wider Borough;
- investing in our communities to ensure sustainable neighbourhoods, by improving the Corridor for existing cyclists and pedestrians and encouraging new cyclists and pedestrians; and
- developing new solutions with partners to reduce inequality.

2.29 The Camden Plan has a strong emphasis on reducing inequality, including inequality in health outcomes. Some of Camden's most deprived communities live close to main roads where traffic volumes and pollution are highest. Further, more deprived communities are more likely to rely on cheaper travel options, such as walking, cycling and public transport in order to access (for example) education, jobs and essential services.

2.30 The relocation of Public Health teams into Local Authorities means that local authorities now have a duty to protect public health and allows them to integrate the wider determinants of health into the planning and delivery of local authority services. Camden's Joint Health and Wellbeing Strategy 2016-2018 (CD3/3) stresses the importance of an environment that encourages residents to be physically active as part of their daily lives.

2.31 The Public Health Outcomes Framework (CD1/7) is a set of indicators compiled by the Department of Health to measure how effectively the activities of each

local authority are addressing the determinants of health. There are 68 indicators, and transport related measures that aim to increase walking and cycling, and limit the impacts of traffic, contribute to achievement of at least a third of them. Indeed, no other area of intervention could affect so many key aspects of population health. For these reasons, Camden's transport policy objectives prioritise sustainable active travel (i.e. walking and cycling). Camden seeks, on the one hand, to increase the level of walking and cycling in the borough while on the other hand limiting motor vehicle use for inessential journeys to reduce the negative impacts of traffic.

- 2.32 Removing barriers which deter people from making active, sustainable travel choices, is integral to the Council's approach, in particular, reducing casualties and addressing the perception of road danger. Providing high quality, safe and appealing environments is essential to enable more people, including those people with protected characteristics (including those with disabilities, the elderly, children, and pregnant women), and those of all ages and abilities to walk, cycle and use public transport, making these travel options, and the health benefits they bring, more accessible. This, in turn, will encourage people to shift to more active sustainable travel choices. It will also contribute to eliminating discrimination and advancing equality of opportunity between persons who share a relevant protected characteristic and person do not share it.

Camden Local Plan (CD3/5)

- 2.33 The Camden Local Plan (July 2017) sets out the Council's planning policies, playing an essential role in the delivery of the Camden Plan. Camden's Local Plan is required to be in general conformity with the London Plan (and approved alterations), details of which are included in the Regional Policy section above.
- 2.34 Policy T1 'Prioritising walking, cycling and public transport' of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 2.35 Policy T3 'Transport infrastructure' of the Local Plan seeks to improve transport infrastructure in the borough by:

- a) 'not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and
- b) protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;'

2.36 Policy T3 seeks to protect all existing and proposed transport facilities and links, and safeguard the potential for improvements to the transport network. Examples of these include two of Camden's key transport projects directly adjacent to the Trial; The West End Project and the North-South Cycle Superhighway.

2.37 Policy T4 'Sustainable movement of goods and materials' seeks to promote the sustainable movement of goods and materials and to minimise the movement of goods and materials by road by encouraging the movement of goods and materials by canal, rail and cycle where possible. Creating wider cycle lanes enables and encourages users with non-standard cycles, such as 'cargo bikes', to deliver more sustainably by increasing safety and ease of access. The Council will promote the use of cycle freight as an extension to cycle courier services by encouraging developers to make provision for cycle freight as part of Delivery and Servicing Management Plans. This provides the potential to manage deliveries in a way that is zero carbon, has little or no noise or air pollution implications and has a minimal impact on congestion.

3 EFFECTS OF THE SCHEME

3.1 A detailed assessment of the effects of the scheme is provided within the Proof of Evidence of my colleague Simi Shah. The following section is a summary of the effects.

Effects on Walking

- 3.2 As set out above, the Trial removed motor traffic in the westbound direction along the Corridor and made provision for a cycle lane in each direction on each side of the street. As well as other intended benefits as set out in section 1.10 (Objectives), reducing the volume of traffic and separating the cycle lanes has made the route more attractive to pedestrians.
- 3.3 Collision data, provided by TfL, has shown a reduction in collisions and casualties following the implementation of The Trial. In addition to this none of the pedestrian casualties recorded were injured as a result of a collision with a cyclist.
- 3.4 Pedestrian counts before and during the Trial showed that there are no significant changes to pedestrian flows.
- 3.5 The scheme layout has increased pedestrian comfort, as having cycle lanes on each side of the road instead of the previous bi-directional cycle track layout, is more intuitive and easier to use (in particular for people not familiar with the area). In addition, removal of one lane of motor traffic has created a safer, less vehicle dominated environment for pedestrians. This is supported by anecdotal evidence submitted to the council as part of the public consultation.
- 3.6 Although some of the existing footways widths fall below the recommended minimum guidance with regards to TfL's Pedestrian Comfort Guidance (PCL), the removal of the bidirectional track has increased pedestrian comfort by making the road layout clearer and removing confusion when crossing the road. Whilst no footway widening has happened as part of the Trial, there is scope within the current layout to increase footway widths and/or to relocate existing street furniture to improve comfort levels for pedestrians and those using pushchairs, wheelchairs or mobility scooters.
- 3.7 In addition to the potential for improvements to footways between junctions, there is also scope to improve the footways at the junctions themselves, which would further improve the safety of the junction by reducing motor vehicle speeds and reducing crossing distances for pedestrians. Other measures, such

as pedestrian countdown timers on traffic signals along the Corridor, could also improve the environment for pedestrians if the trial layout were to be retained.

- 3.8 Feedback during the Trial has suggested that many pedestrians have found it easier to cross the road under the Trial arrangements and have appreciated the reduction in motor traffic along the route. However, a small number of pedestrians were less confident interacting with cyclists on both sides of the road. It is acknowledged that cycle speeds may have increased during the Trial period, however, these are expected to reduce again as a result of the number of cyclists using the Corridor increasing. As a result of the mix of cyclists and types of cycles now seen, it is expected that speeds will be self-regulating. In addition, improvements can be made to controlled pedestrian crossings, such as introducing pedestrian countdown (which tells pedestrians how much longer they have to cross), which could increase confidence levels and draw people to use those crossing points rather than crossing at ad hoc locations.

Effects on cycling

- 3.9 As noted in Section 1, the pre-Trial layout was insufficient to cope with the high flows of cyclists along the Corridor. One of the key objectives of the scheme was to create safer, more comfortable conditions for cyclists.
- 3.10 Early indications from TfL provisional collision data suggest that alongside an increase in the number of cycle trips there has been an increase in the number of collisions involving cyclists. The severity of injuries, however, has reduced, with all reported as 'slight' injuries. Three years prior to the implementation of the Trial, ten collisions were recorded as 'serious' compared with no serious collisions recorded during the Trial. Although the average number of cyclist casualties has increased during the Trial, it should be noted that cycle counts undertaken before and during the Trial indicate that the Scheme has resulted in a marked increase in cycle trips (up to 52% during peak hours).
- 3.11 The Cycling Level of Service (CLoS) score for the Corridor has more than doubled as a result of the improvements made possible by the Trial layout. The

CLoS assessment areas which have benefited most from the scheme layout are 'safety' and 'comfort'. Should the scheme be made permanent there is potential to increase the CLoS score further through, for example, the implementation of stepped tracks or the provision of higher quality materials.

- 3.12 Anecdotal evidence submitted during the public consultation indicates that cyclists feel much safer, and that people who felt intimidated by conditions on the Corridor before the Trial now feel able to use the route and encourage friends and family to do so. Of all respondents to the consultation 25% commented that since implementation of the Trial, the Corridor felt safer and more pleasant to cycle and walk.

Effect on general motor traffic

- 3.13 The western section of the Corridor between the junctions with Tottenham Court Road and Gower Street has been made one-way westbound with the remainder of the Corridor, between Gower Street and Hunter Street one-way eastbound for motor traffic. No continuous eastbound or westbound link between Tottenham Court Road and Hunter Street has been provided for motor traffic, as the intention is to avoid attracting 'through traffic', including more strategic motor traffic from the TfL Road Network (Euston Road), onto the more local road network.
- 3.14 The volume of motorised traffic has reduced as a result of the Trial layout as 'through traffic' is unable to use the Corridor to gain access from Tottenham Court Road to Hunter Street, and vice versa.
- 3.15 The impact of the Trial on traffic, compared with potential alternatives, has been assessed with the aid of traffic modelling undertaken by transport consultants (Systra) appointed by Camden (see the Proofs of Evidence of my colleagues David Carter, Tony Dichev and Simi Shah).
- 3.16 The conversion of the street from two-way to one-way working for motor traffic has inevitably changed some traffic patterns in the area. Removing traffic from the Corridor appears to have rerouted some motor traffic to Endsleigh Gardens

as this provides an alternative westbound route for vehicles seeking to access Euston Road especially whilst the alternative route via Gordon Square is blocked by construction works. Additionally, anecdotal evidence suggests that the trial layout has led to an increase in journey times for motor vehicles at some times. While the Trial restricts east-west movement between Tottenham Court Road and Judd Street/Hunter Street, the journey is still possible, though less direct. Inevitably it is difficult to tease out any confounding effects from an extensive series of road closures for the duration of utility and other street works over this period.

Effect on emergency traffic

- 3.17 As noted in paragraph 1.3, the Corridor is identified as an emergency route, however, this designation has no formal status. It is acknowledged that by removing westbound traffic, the number of routes available to emergency vehicles is reduced. However, alternative east – west routes are available and the traffic order permits emergency services to enter the cycle lanes in an emergency situation. Further, this was not a concern that was raised by the Metropolitan Police in discussions regarding the Trial. Further, the London Fire Brigade have indicated that the east-west route that they use is Euston Road.
- 3.18 The London Fire Brigade (LFB) based on Euston Road have indicated that they would only use the Corridor as a route if the emergency they were responding to was on the corridor or a surrounding street. Otherwise they would use Euston Road as the key east-west route. As described by Simi Shah the LFB has also provided attendance times broken down by Ward, this shows that since the implementation of the Trial in 2015 there has actually been a decrease in attendance times in the Bloomsbury Ward (and in the neighbouring Kings Cross Ward).

Effects on parking, waiting and loading

- 3.19 There was a limited effect on parking as a result of the Trial. Overnight parking was affected as a result of single yellow lines being replaced by double yellow lines. There were no dedicated parking bays along the Corridor itself before the Trial and no parking bays were removed or introduced as part of the Trial.

The sections of the Corridor which previously had single yellow line restrictions that were replaced with a double yellow line are between:

- The junction with Tottenham Court Road to the west and the junction with Woburn Place to the east.

- 3.20 On the side streets from the Corridor there has been a loss of 3 resident parking bays when they were replaced by loading facilities. Further, it is noted that access to other parking bays on side streets may be slightly longer with the Trial in place due to the one-way traffic restriction.
- 3.21 The Trial removed loading provision on the southern kerbside (the northern kerbside already had no loading provision) along the Corridor, aside from a dedicated loading bay provided on Torrington Place. Alternative loading provision is included on side streets along the Corridor (such as in Marchmont Street), (further details of which can be found in Simi Shah's Proof of Evidence).
- 3.22 Pick-up and drop-off activity continues to be permitted along both sides of the Corridor. This is not an urban clearway therefore there are no restrictions on picking up and dropping off passengers.

Effects on public health, wellbeing and amenity

- 3.23 In relation to public health, the scheme layout is in line with the Camden Transport Strategy to promote a shift towards active modes of travel through the provision of an improved environment for pedestrians and cyclists. Increasing walking and cycling has numerous benefits for public health, including:
- a) Improving air quality through reducing car use with direct positive effects on physical health;
 - b) Promoting physical activity through walking and cycling, which is associated with a range of benefits for physical and mental health;
 - c) Creating safer street environments for all;

- d) Contributing to meeting carbon emissions targets and the long-term health benefits of tackling climate change;
- e) Improving the overall amenity of an areas by reducing the effects of motor traffic.

3.24 Further information on how the scheme contributes to improving public health and wellbeing is including my colleague's proof of evidence.

Effects on air quality

3.25 Air quality appears to have improved along the Corridor after removal of one lane of motor traffic. Monitoring was undertaken at three sites along the Corridor before and after introduction of the scheme (and is ongoing). During the Trial, another two monitors were installed in response to consultation responses, on Judd Street and on Endsleigh Gardens. There are also monitors on Euston Road and in other locations across the area, including those associated with the HS2 project. A map showing the location of all air quality monitors in the can be found in my colleague Adam Webber's Proof of Evidence. While the majority of local roads do not reflect increases in air pollution that could be ascribed to the displacement of traffic from the Corridor, pollution levels in Endsleigh Gardens may have been raised as a result of traffic displacement (compounded by the closure of Gordon Square for building works). However, it is considered that the improvements to air quality in the Corridor more than offset a reduction in air quality on other local roads, especially given the increased numbers of pedestrians and cyclists benefiting from better air quality along the Corridor. Mayoral initiatives, like the toxicity charge (T-charge) and Ultra Low Emission Zone, are expected to further improve air quality and the requirement that new taxis are zero emission capable from 2018 will bring further positive benefits.

3.26 It should also be noted that through the enhanced cycling facilities and the promotion of modal shift away from private motor vehicles, the total amount of traffic in the area is likely to have reduced.

3.27 While future policy interventions by regional government (such as the ULEZ) are likely to have a larger impact on air quality levels in Central London than local interventions, modelling of future air quality levels incorporates predicted effects of local schemes which aim to encourage modal shift from motor vehicles. The reduction in pollution levels along the Corridor and overall decrease in the amount of traffic in the area means that the scheme can be considered to meet the objectives set out in Camden's Clean Air Action Plan, which seek to achieve compliance with air quality objective levels as soon as possible, including actions to reduce emissions from road transport sources and to encourage modal shift.

Assessment against TfL Criteria (CD5/3)

3.28 To implement the Trial, the Council had to secure approval for the trial from TfL, who set out a number of criteria for gauging success these are summarised as:

- Traffic volumes:
 - Overall reduction in flows of greater than 20% on Torrington Place
 - Increase in traffic volumes do not exceed levels modelled by TfL by a variance of greater than 5%
- Collisions
 - Less than 4 collisions in the 3 month period on Torrington Place
 - Less than 1 'serious' collision reported in the 3 month period on Torrington Place
- Air Quality
 - A greater than 15% reduction in NOx emissions on Torrington Place
- Public Stakeholders
 - Greater than 50% level of support

3.29 The monitoring and consultation exercise undertaken, following the implementation of the Trial, has shown that the Trial has met these criteria:

- Traffic volumes have decreased by more than 20% on Torrington Place, with a 50% decrease in flows across the day recorded;
- Generally traffic does not exceed levels modelled by TfL by a variance of greater than 5%, in the roads adjacent to the Corridor the traffic

volumes are generally lower than the model indicated. However, it is acknowledged flows are higher than anticipated on Bedford Way;

- The collision data has been collected for a 14 month period, during that time there were 16 collisions, all of which were classified as slight. The average collision rate for is 3.4 collisions per 3 month period; and
- The NOx levels recorded at two locations on the Corridor. The site on Gordon Square recorded a 9% decrease in NOx levels and the site on Tavistock Place recorded a 21% decrease in NOx levels.

Effect on Equalities: groups with protected characteristics

- 3.30 As part of its decision-making process on the Trial, the Council prepared an Equalities Impact Assessment (EIA) (appendix E of CD6/2) which identified positive and negative effects on people with protected characteristics, including disabled people. The Council concluded that the positive impacts of the scheme outweigh the negative impacts, taking into account the mitigating steps referred to in the EIA.
- 3.31 The EIA includes consideration of consultation comments suggesting that the pre-Trial, narrow track excluded users with non-standard cycles and deterred less confident cyclists, such as elderly and young people and children and pregnant women, as people were fearful of getting stuck, causing a collision or preventing other cyclists passing. The pre-Trial bi-directional track was too narrow for trikes and hand-cycles, particularly during the morning and evening peak hours, and did not create an inviting environment for families to cycle with young children. The Trial layout encourages more people with protected characteristics to cycle, such as disabled and older people, since the wider cycle lanes enable a wider range of people to use the Corridor. The trial layout improves the environment for users with larger cycles and less confident cyclists since there is also an increased feeling of safety when using the route. 134 responses to the public consultation (approx. 1%) mentioned that the Trial had made cycling and walking easier/more accessible to groups under-represented in cycling, such as older people, disabled people, women and children / younger people / families.

- 3.32 Other feedback from public engagement showed that there were concerns with lack of taxi drop-off and pick-up areas and expressed concern that this could discriminate against people with protected characteristics, including disabled people in particular, as well as elderly people and pregnant women. It is understood that travel by taxi forms an important mode of travel for some people with protected characteristics, including disabled people in particular, as well as elderly people and pregnant women. However, as shown in Figure 2.23 of TfL's Travel in London Report 9 (see CD2/7), less than 5% of disabled people travel by taxi as their main mode of travel in London. Further, this is only slightly more than non-disabled people.
- 3.33 The Council has retained a dedicated taxi rank on the southern side of the Corridor, outside the Tavistock Hotel, enabling taxis to arrive at the kerb side. If drivers of black cab taxis need to deploy a ramp to allow a disabled person who is also a wheelchair user to get into or out of the taxi, they can use streets either side of the hotel, Bedford Way and Woburn Place, to drop off or pick up passengers, as set out in paragraph 5.7, which are a distance of 46m from the hotel main entrance.
- 3.34 The strategy for measures to mitigate negative effects includes incorporating some of the suggestions made as part of the public consultation, such as investigating ways to improve delineation of space for cyclists and pedestrians on Byng Place, improving visibility for cyclists and pedestrians on zebra crossings along the Corridor, making it easier for visually impaired people to distinguish between the pavement and the road if future measures such as raising the road to the level of the pavement were introduced, and investigating alternatives to the rubber blocks used to separate the southern cycle lane from the traffic lane ("orcas") which visually impaired people could trip over.
- 3.35 Monitoring will also be undertaken (of traffic flows and air quality and the effects of High Speed rail link 2 (HS2) construction traffic to inform possible and appropriate mitigation measures to address displaced traffic. The operation of the loading bay on Torrington Place will continue to be monitored in terms of

the interaction between loading vehicles and cyclists to address safety concerns raised by cyclists as well as concerns about insufficient loading space being available for residents. The Council will continue to consult and engage with groups representing people with protected characteristics (including RNIB and Guide Dogs), to have due regard to the matters set out in section 149 of the Equalities Act 2010 and to comply with its duties under section 29 of the Equality Act 2010, in respect of scheme proposals in the area as well as at the detailed design stage for the Torrington Place / Tavistock Place route, should a decision be made to retain the current layout and make improvements.

4 CONSULTATION AND ENGAGEMENT

- 4.1 This section summarises the history of the engagement and consultation undertaken in relation to the scheme (further detail is set out in appendix C to CD6/2). Section 5 provides responses to the objections received in response to the statutory consultation on the permanent traffic order.

Pre- consultation comments

- 4.2 When the Trial was implemented in November 2015, the Council published information on its website and distributed an information leaflet along the Corridor, inviting stakeholders to provide feedback on the trial layout. This enabled officers to monitor feedback on the Trial and to address concerns and enquiries. This feedback, together with the Council's own observations and data collection, enabled the Council to make modifications during the Trial. It also informed the proposals set out in the public consultation in September/October 2016.
- 4.3 The Council received 1,424 comments in the period between the Trial being implemented (November 2015), and the formal public consultation being launched in September 2016.
- 4.4 Of the organisations and individuals that commented, 55% supported the Trial scheme, 38% were opposed and 8% did not express an opinion.

- 4.5 Positive/supportive comments on the Trial layout highlighted safer, more pleasant conditions for walking and cycling; improved environment, improved air quality, reduced traffic, encouraging more cycling/walking/shift to sustainable transport, improvements for older people / disabled people / families, and reduced noise.
- 4.6 Negative comments expressed concerns about displaced traffic / congestion / longer routes / traffic flow, air quality, delay to emergency services, servicing, loading and unloading, taxi/mini-cab drop off and pick up, safety, underutilised cycle lanes, detrimental to older people / disabled people and families.
- 4.7 Although support for the scheme in the immediate post-implementation period was 55%, it should be acknowledged that traffic patterns can take some time to settle following the introduction of new traffic arrangements. There can be a range of short-term effects, resulting from people changing their travel behaviour, such as re-routing, and/or changing their time or mode of travel. Therefore, the views expressed during the public consultation that was carried out ten months after the introduction of the Trial, i.e. once traffic patterns had settled down, is a better reflection of the views of the public regarding the scheme. A number of respondents to the public consultation mentioned that their views had changed as traffic had settled down or road users had become more used to the changes implemented as part of the Trial.

Public consultation

- 4.8 A formal public consultation on the Trial was held from 12 September to 21 October 2016. The Council used a comprehensive range of methods to make sure that the consultation was widely publicised and that as many local people as possible were informed of, and able to take part in, the consultation. Leaflets were delivered to residents and businesses in the consultation area (see figure 3 of appendix C in CD6/2), a total of 12,240 addresses. As well as delivering letters, over 120 posters were displayed at bus stops and on the streets, information was provided at local libraries, and drop-in sessions were held at the Town Hall on 22 September and 12 October 2016. Further, Councillors and officers attended public meetings, information was placed in the local press,

articles were published in the Camden magazine, and awareness was raised through the Council's Facebook and Twitter services.

- 4.9 Campaigns and consultations were also undertaken by other organisations (both for and against the proposals), in particular the Licenced Taxi Drivers Association (LTDA) and Imperial Hotels Ltd. Camden Cyclists (formerly Camden Cycling Campaign), the local arm of the London Cycling Campaign, undertook activities to raise awareness of the Council's consultation. Bloomsbury Residents Action Group (BRAG) held a community planning day. Some of these campaigns also leafleted local homes and road users with their own materials to encourage people to respond.
- 4.10 A total of 15,096 verifiable responses were received from residents, local businesses and employees and others who use the route, the highest number of responses for any Council-led public consultation. Overall, 79% of respondents were in favour of retaining the current layout (with the potential improvements), 21% were against, and 1% had no opinion. In response to the question as to whether they would want the street returned to its pre-trial layout, 79% of respondents said that they would not. All responses received were analysed, and considered in a report submitted to the Cabinet meeting on 22 February 2017 (see Appendix C report CD6/2).
- 4.11 Statutory consultees were consulted in relation to both the ETO (in November 2015) and also the potential permanent scheme (in September/October 2016). Responses were received from a number of organisations, such as University College London, London Cycling Campaign, Wheels for Wellbeing (a charity supporting cycling among people with disabilities) and RNIB. The Council has been pro-active in contacting the emergency services, who were contacted several times since implementation of the Trial. There was ongoing liaison with the Metropolitan Police Traffic Management Unit before and during implementation of the Trial. Overall, they welcomed the proposals, but raised some concerns early in the Trial, which officers worked with them to address. After the public consultation closing date had passed, a response was received from the Camden Ambulance Service, based at Cressy Road (NW3), who

opposed the trial being made permanent due to concerns about the impact on response times.

- 4.12 A total of 2,208 respondents were identified as residents (people living within the borough). Of these, 73% supported keeping the Trial street layout. Responses have been broken down and analysed by postcode area, which shows that in postcodes closest to the Corridor, (WC1H, WC1X, WC1E, WC1N and WC1B), there is majority support for keeping the Trial street layout. WC1B is the exception.
- 4.13 The Council went to considerable effort to ensure that the public consultation was widely known about and to encourage as many responses as possible. Whilst people who live within the Borough have been categorised as 'residents' in officers' analysis of the consultation responses, this overall category of consultation respondents has also been broken down by postcode area. The breakdown shows that 1,009 respondents were residents in the WC1 postcode area (the area closest to the scheme). Of these, 56% (564 respondents) were supportive of the current trial layout.
- 4.14 Over 7,500 respondents provided comments on aspects of the proposed scheme. Issues arising out of the consultation include safety concerns relating to two key signal junctions on the Corridor, the Judd Street / Tavistock Place junction and the Bedford Way / Tavistock Place junction. Concerns have also been raised regarding conflict between pedestrians and cyclists using the shared space area at Byng Place. In response, officers are investigating measures to address these and will implement these as soon as they are considered feasible and practicable. At the traffic signals this may mean allowing cyclists to go through the junctions at a different time to motor traffic. At Byng Place it could mean providing additional delineation between cyclists and pedestrians. Officers are also aware of concerns relating to signage for the southern cycle lane, and are reviewing potential options for modifications to it.

Consideration of alternative options

- 4.15 In response to the consultation, a number of consultees expressed a preference for one or more alternative layouts. These have been evaluated by officers.

Detail on the results of the evaluation of alternatives can be found in my colleague, Simi Shah's, Proof of Evidence. In summary, BRAG's preferred alternative, which proposes two-way traffic with with-flow cycle lanes, does not meet desirable minimum standards for footway, cycle lane or carriageway widths, and would not meet the scheme objectives. Further, it would not accommodate wheelchair cycles or most other adapted cycles used by people with mobility or balance impairments. Another suggested alternative, to make a short section of the Corridor two-way (Bedford Way to Byng Place), does provide sufficient road width to accommodate the cycle lanes and two-way traffic. However, it does not leave any room to provide improvements for pedestrians achieved by widening the footway and the section by Tavistock Square currently has narrow footways and would greatly benefit from footway widening. It has also been suggested that the one-way vehicular traffic flow should be reversed so that the one way traffic runs in a westbound direction. Modelling has been undertaken to assist in assessing the impact of the current trial layout and reversing the flow. This has shown a greater level of reassignment to more local roads. For these reasons, the view of officers is that the alternatives suggested should not be progressed further.

- 4.16 Officers recognise that the alternative options suggested by stakeholders opposed to the Trial are not necessarily wholly counter to the Council's policies and objectives. It is officer's view that the trial layout meets the Council's policies and objectives more fully than the alternative options suggested, however, it is recognised that there are some disadvantages including longer journeys to some locations such as hospitals for people that are reliant on motor vehicles, or taxi drop-off and pick-up being less convenient. On balance, officer's are of the view that the Trial layout should be retained.

Post consultation engagement

- 4.17 Following the end of the formal consultation period, officers and Councillors continued to engage with interested parties and have held a number of meetings to discuss the scheme and their response to the consultation. Some of this post-consultation engagement took place at regular meetings held by officers with relevant organisations, such as with representatives of the taxi

industry. In other cases, dedicated meetings were arranged to address specific issues of interest to stakeholder groups.

- 4.18 On 20 December 2016, Bloomsbury Residents' Action Group (BRAG) presented a petition to the Council. The petition has 1,083 signatures from both Camden residents and non-residents. It calls for the Trial traffic scheme to be abandoned due to perceived negative effects on the day-to-day lives of residents who live close to the Corridor. The BRAG petition was not a response to the Council's public consultation, but related to the same issue and was referred to in the Cabinet decision report (section 8 and appendix H of CD6/2).

Response to notice of progression to Permanent Traffic Order (PTO)

- 4.19 Following the decision by the Council's Cabinet to progress a PTO that would extend the ETO indefinitely (subject to a further decision by Cabinet, after the Public Inquiry, as to whether the scheme should be made permanent), statutory groups (including the emergency services) and interested parties (such as LTDA, Imperial Hotels and CCC) were notified of the Council's intention. In total 9 responses were received, as follows:
- a) **Camden Cycling Campaign (CCC)** strongly support the Scheme and asked for advice about preparation for the Inquiry;
 - b) **Bloomsbury Association** wish to submit representations (nature unspecified) to the Inquiry;
 - c) **Bedford Estates** wish to submit representations to Inquiry (view Scheme as generally detrimental to area);
 - d) **UCLH (Property & Transport Management)**: outlines concerns about non-emergency patient transport times while also stating that there is continued support from UCLH staff who cycle.
 - e) **Friends of Tavistock Square** – wish to object and make representations to the Inquiry (objections not specified);
 - f) **Taxis and Private Hire, Transport for London** have enquired about mitigation measures proposed to tackle perceived increased congestion and journey times for taxis as a result of the Scheme. (Note that this is not a corporate TfL view, but that of the Taxis section only).

- g) **BRAG** have re-submitted their consultation response of 21st October 2016, which sets out its objections to the Scheme, including the contention that there is a better alternative;
- h) **Imperial Hotels** (submitted by their transport consultants, Motion). Object on grounds of: traffic congestion; impact on air quality, restricted access to/from the hotel, in particular for disabled people; no detailed consideration of alternative schemes; scheme promotes traffic movements disruptive to traffic flows in the area. (Before publication of the Notice, shortly after the Cabinet meeting in February, the Council was also contacted by Imperial Hotels' legal representatives asking to participate in the Public Inquiry).
- i) **Individual**. Objects to ban on westbound motor traffic turning right into Judd Street, and to making route eastbound only from junction with Gower Street. Objects to lack of alternative westbound routes (which avoid Euston Road or High Holborn).

4.20 Three other organisations and one individual also asked to appear at the public inquiry. All of these respondents object to the order, or aspects of the order.

- a) **Licensed Taxi Drivers' Association (LTDA)** – wish to object and are concerned about an increase in traffic congestion in the area surrounding the route, an increase in air pollution along neighbouring roads such as the already heavily polluted Euston Road, and significant journey time and accessibility effects for disabled road users and those wishing to access hospitals surrounding Euston Road
- b) National Union of Rail Maritime and Transport Workers Union (RMT), Ranks & Highways Officer: **Tamar House RTM Company Ltd** (Residents' Company, Tavistock Place). State that opinion is divided on the traffic trial itself, but outlines concerns about the loading ban on Tavistock Place
- c) **An Individual**. This person objects to increase in congestion and reduction in air quality due to lack of westbound route and would like the Council to consider alternative westbound route or shared space between cyclists, motor traffic and pedestrians.

5 **OBJECTIONS TO THE INTENTION TO CREATE A PERMANENT TRAFFIC ORDER**

- 5.1 The main grounds for objection to the PTO (where specified) are set out below. They reflect some of the concerns expressed in the public consultation conducted in Autumn 2016. Officer's summary assessments follow the summary of each ground.
- 5.2 **That the mainly eastbound one-way system introduced as part of the Trial displaces traffic onto other roads, including residential streets, causing delays to motor traffic, congestion and increases in noise and air pollution on some streets.** A key objective of the Camden Transport Strategy is to reduce motor traffic levels, while ensuring that journeys which have to be made by motor vehicle (for example, emergency vehicles, servicing vehicles and those journeys for which other modes are not possible) can be made. While some road space along the Corridor has been reallocated to non-motorised modes, using the space in this way provides for a greater throughput of people. At the same time, safer facilities for walking and cycling encourage a switch from motorised modes, thereby reducing car journeys (while freeing up space for essential journeys). Road space in Central London is limited, but cycling and walking are very space-efficient ways of moving people around - the space occupied by one car is equivalent to five bicycles (bicycles are considered 0.2 of a Passenger Car Unit (PCU)). Cycling is significantly more efficient at transporting individual people within the same road space, particularly as the average speeds of a bicycle and a car during peak travel times are similar. In addition, the size and shape of a bicycle generally allows cyclists to make use of space on the road that would otherwise be unusable by larger vehicles. Air quality monitoring along the Corridor was installed in July 2015, and the results indicate significant improvements in air quality since introduction of the Trial. During the public consultation, a number of respondents expressed the view that, while air quality had improved along the Corridor itself, it had worsened in some other streets as a result of motor traffic seeking new routes. In response, the Council installed monitoring equipment in Judd Street and Endsleigh Gardens. At the latter, NO₂ emissions significantly exceed objectives. While this may, in part, be attributable to the proximity of Euston Road, it seems likely that some could be attributable to rerouted traffic

exacerbated by local road closures. The Council is committed to working with stakeholders to address these localised disadvantages, such as permitting the right turn from Euston Road to the Euston Station taxi rank in Melton Street. Overall, the officers' view is that the scheme delivers more route-wide and localised air quality and noise benefits than negative effects. Feedback received via the public consultation indicates that many stakeholders, including some local residents, share this view.

- 5.3 **That the Trial makes servicing, loading and taxi journeys more difficult, and more expensive, along the Torrington Tavistock corridor:** It is true that the Trial may make some journeys by taxi less direct. However, it is necessary to strike a balance between maintaining reasonable access for deliveries and servicing, while also providing safe segregated facilities for cycling and walking. Wherever practicable, loading and delivery facilities have been provided on side streets, rather than along the Corridor itself. This has been undertaken so as not to disrupt cycle and pedestrian traffic, but still provide loading and delivery facilities within reasonable distance of affected premises. Where it has not been practicable to locate loading on side streets, but where provision for loading and access is made within the Corridor itself (affecting the cycle tracks), this has been provided for between 10am - 12 noon and 2pm - 4pm, so as to avoid peak commuting hours. Reasonable access to premises has been maintained.
- 5.4 **That the trial imposes inconvenience/has negative effects on residents' day to day activities:** Officers recognise that the Trial makes some local journeys by motor vehicle slightly less direct. However, the Trial has significantly improved the street environment for residents who walk and cycle (including those who walk and cycle as part of their journey to local public transport stops and stations) and for those who wish to simply congregate in the area. To the south of Euston Road, 78% of households do not have access to a car. Some 36 per cent of Londoners are considered to be on 'low incomes'. The Trial will benefit these households by providing sustainable, active and cheap transport options for people of all ages and abilities. These benefits are likely to significantly outweigh the inconvenience for motorists.

- 5.5 **That the Trial is disadvantageous to older people, those with disabilities and families, as a result of more restricted access, and longer journeys by motor vehicle.** Access by motor vehicle is retained to all properties and side streets along the Corridor. However, any scheme that restricts vehicular routing options is likely to result in longer journeys and the Trial is no different in this respect. It is likely that westbound journeys have been made slightly longer and additional time may need to be factored into journey planning. Anecdotal evidence and officer evidence suggests that in 'normal' peak traffic conditions there has not been a significant increase in journey times by motor vehicles through the area.
- 5.6 It is often assumed that disabled people cannot cycle, or are not interested in cycling. In fact, according to TfL figures, approximately 15% of disabled people in London actively cycled for transport in 2014, compared to 18% of non-disabled people. Many disabled people find cycling easier and safer than walking. Cycling provides door to door transport, and cycles, like mobility scooters or wheelchairs, can be combined with other modes of transport. Disabled and older people in particular can benefit from cycling becoming safer, as they tend to exercise less than other groups. Cycling and walking are also low cost modes available to a wider range of people than motor vehicles or public transport. Segregated cycling facilities, which make people feel safer, have been shown to encourage cycling among women, older people and parents with children, and consultation responses showed that this was welcomed.
- 5.7 **In particular, that the Trial causes disadvantage to wheelchair users seeking to access the Tavistock Hotel, as black cabs are unable to drop their nearside wheelchair ramps outside the Tavistock Hotel, due to the eastbound one way system introduced as part of the Trial for motor traffic.** It is recognised that one way working along the Corridor has made it more difficult for black cabs to use their fold down ramps to facilitate pick up and set down of people who use wheelchairs on the Corridor itself. The ramps are located on the nearside of the vehicle, so using them as intended would involve setting the passenger down into the cycle track. However, should a fold down

ramp be required, provision for pick up and drop off is available at the side of the hotel on Bedford Way (in the southbound direction), within 50m of the main hotel entrance, and on Woburn Place (in the northbound direction).

- 5.8 **That the Trial contributes to creating longer journeys for patients attending appointments at hospitals, and patient transport between UCLH hospitals.** Officers engaged with UCLH before introduction of the Trial and asked UCLH to provide before and after data to help monitor the effects of the Trial on non-emergency patient transport. UCLH did not provide this data as they said that it was not possible. The consultation response from UCLH stated that there have been increases in some journey times for motor vehicles as a result of the Trial layout. It should be noted that there are (and have been) other developments and road works in the area during the period of the trial which would be likely to have impacted on journey times, which could very well have influenced overall perceptions. Nevertheless, it is recognised that there will be some journeys which will be longer and will need to be factored in to journey planning. Any additional distance and journey times is the result of what is largely through traffic being reassigned to roads whose primary function is to carry such traffic. This has delayed some journeys. However, it has reduced traffic and improved air quality along the Corridor and reduced traffic on a number of other local streets around the Corridor. Together with wider cycle tracks, this encourages more people to walk and cycle with associated health and wellbeing benefits.
- 5.9 **That the scheme impedes emergency vehicles:** Officers advised the emergency services of their intention to introduce the Trial in 2015, actively seeking feedback. The Metropolitan Police welcomed the introduction of more and safer space for cycling, and made some suggestions for modification, which officers incorporated into the trial scheme. No feedback was received from the ambulance and fire services at this time. Further, no complaints/objections were received from the emergency services during the public consultation in 2016, or subsequently in response to advertisement of the Council's stated intention to make the traffic order permanent. However, in February 2017, the Council again contacted Camden Ambulance Service for their view, and

concerns were expressed at this point about the impact on journey times due to more restricted access for motor traffic and congestion. As identified in paragraph 1.3, the Corridor is identified as an emergency route, however, this designation has no formal status. The traffic order permits emergency services to enter the cycle lanes in an emergency situation. Further, the London Fire Brigade based at Euston Station have indicated that they would only use the Corridor as a route if the emergency they were responding to was on the corridor or a surrounding street. Otherwise they would use Euston Road as the key east-west route. The London Fire Brigade has also provided attendance times broken down by Ward, this shows that since the implementation of the Trial in 2015 there has been a small decrease in attendance times in the Bloomsbury Ward (and in the neighbouring Kings Cross Ward). See Simi Shah's Proof of Evidence.

5.10 That the consideration of alternative schemes should be more extensive:

The Council has devoted significant time and resources to alternatives, including examining the alternative schemes suggested by stakeholders. The results of the assessment were reported to the February Cabinet meeting (appendix D of CD6/2) and details are provided in the proof of evidence of my colleague Simi Shah. However, after thorough evaluation, officers conclude that the alternatives did not provide the same level of benefits as those delivered by the selected trial scheme.

5.11 That the Trial promotes incorrect turns and u turns which disrupt traffic on the Corridor, and that restricting westbound traffic on the Torrington Place to Tavistock Place corridor leaves too few westbound routes for taxis and servicing:

During the Trial westbound motor traffic has not been allowed to access the Corridor, however the Trial does not prevent access to any part of the area. Reasonable access is provided for westbound traffic via alternative routes, which include Euston Road, Endsleigh Gardens, Gower Street, Woburn Place, Bedford Way, Great Russell Street and High Holborn. Information showing alternative routes has been provided on the Council's website. The appropriate route for motor traffic travelling through the area, but not accessing the area, would be Euston Road. It is not unusual for motorists

to take a little while to become accustomed to network changes soon after they are made and incorrect turns can be expected to reduce over time.

6 CONCLUSION

- 6.1 Progressing the Order towards approval is in line with national, regional and Camden Council transport and environmental policy, as it will reallocate space in favour of active, sustainable walking and cycling, thereby improving the quality of the environment for existing users of the Corridor while also encouraging people to take up these modes, delivering benefits for public health. Investing in infrastructure to encourage such changes will not only deliver environmental, public and personal health benefits. It also has the potential to achieve other policy objectives as it helps to provide an attractive public realm, supporting local businesses, reduce car travel and associated air pollution, CO2 emissions, congestion, noise and road danger. It will better enable the Council to perform its duties under the Equality Act 2010. Streets which promote walking and cycling make public spaces more welcoming and provide opportunities for social interaction and economic activity. Improvements to cycling infrastructure are positively correlated with an increase in cycling, which can help reduce traffic and free up capacity for essential journeys which have to be made by motor vehicle (for example, emergency vehicles, patient transport, servicing vehicles and other journeys which cannot be made by non-motorised modes). This promotes more efficient use of limited road space. Continuing the current Trial traffic arrangements, compared to reverting to pre-Trial conditions and the alternatives suggested, will also serve to reduce through traffic on the Corridor: modelling indicates that most traffic will reassign to the Transport for London Road Network and Strategic Road Network, rather than to local roads where more people live, work and socialize. This will keep traffic to the most appropriate routes and improve the pedestrian environment. Reasonable access by motor vehicle to premises is maintained under the trial layout, although it is recognised that with the westbound movement removed for motor traffic, some vehicle journeys may take longer, particularly during peak hours.

- 6.2 Objections to the trial scheme relate to longer journeys, displaced traffic, congestion and concerns relating to localised environmental effects (including air pollution and noise). As recognised in the February Cabinet report, the monitoring undertaken suggests that some traffic previously travelling westbound on the Corridor has diverted to other streets, such as Endsleigh Gardens, Euston Rd, Judd Street and Gray's Inn Road. While effects of the Trial continue to be monitored and potential mitigation measures explored, officers are of the view that the trial scheme can be fully justified given the benefits for vulnerable road users, including those with disabilities, and the Council's wider transport, air quality and equality objectives and duties.
- 6.3 More efficient use of the limited carriageway space will not only deliver environmental, public and personal health benefits but will also mean less traffic on the road. This brings benefits for vulnerable road users accessing both the Corridor and its surrounding area.
- 6.4 The changes made to the Corridor as part of the Trial have created a safer, calmer, more attractive and less polluted environment for the thousands of people of all ages and abilities who walk, cycle and congregate along the route each day. Benefits accrue to residents, commuters, students, employees, businesses and people visiting the area. At public consultation, Camden Council received more than 15,000 submissions, the highest ever response to a consultation in the borough, and 79% of respondents were in favour of retaining the current layout. Having considered comments from a wide range of stakeholder, and the evidence relating to the effects of the trial, the view of officers is that the significant benefits of the scheme outweigh the disadvantages and that the trial layout should be made permanent/retained.
- 6.5 As set out in the Cabinet Report (see e.g. paragraphs 4.13 and 4.18-4.19), officers consider that it would be expedient to progress the recommended Order for the purposes which are set out in the report.
- 6.6 Considering all of the factors and context, I am of the view that the Trial represents the best available option for the layout of Corridor.

