



## **TRANSPORT STRATEGY SERVICE**

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

**Road Traffic Regulation Act 1984**

**HIGHWAYS (INQUIRIES PROCEDURE) RULES 1994**

## **STATEMENT OF CASE of the London Borough of Camden**

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### **SITE**

The scheme is located on the Torrington Place / Tavistock Place corridor, between the junctions with Tottenham Court Road and Judd Street (shown indicatively on the attached Plan 1, attached in Annex 13).

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### **SUBJECT OF INQUIRY**

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

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### **PLANNING INSPECTORATE REFERENCE:**

DPI/X5210/17/8

### **COUNCIL REFERENCES:**

- Cabinet Decision, 22 February 2017 - Torrington Place / Tavistock Place route – trial traffic scheme, SC/2017/04
- Single Member Decision of the Cabinet Member for Regeneration, Transport and Planning, 1 July 2015 – Torrington Place to Tavistock Place Experimental Traffic Changes, CENV/2015/25

## 1 Context

- 1.1. In November 2015, the Council made an Experimental Road Traffic Order (ETO) (as amended in 2016)<sup>1</sup> in the same terms as the Order the subject of this Inquiry. At its Cabinet Meeting on 22<sup>nd</sup> February 2017, Cabinet considered a detailed Report relating to the ETO. That Report invited a decision from the Cabinet as to whether the ETO should be progressed with a view to being made permanent, or allowed to lapse (either with or without a request to bring forward some other and different Order) (see para 1.4 of the Report). (The Report is reproduced at Annex 1.)
- 1.2. Having considered the Report, Cabinet resolved, inter alia, to
- (i) approve the progressing of a permanent traffic order that has the sole effect of reproducing and continuing in force indefinitely (subject to a further decision by Cabinet as per (iv) below) the provisions of the ETO, subject to relevant statutory processes being followed as summarised in paragraph 3.7 of the Report;
  - (ii) approve the holding and participation by the Council in a public inquiry conducted by an independent inspector who will report to the Council as set out in paragraphs 3.8 and 3.9 of the Report;
  - (iii) agree to delegate authority to the Director of Regeneration and Planning, in consultation with the Cabinet Member for Regeneration, Transport and Planning, to take any necessary steps to progress (i) and (ii) above;
  - (iv) note that a further report will be brought back to Cabinet to include the Inspector's Report with a view to making a final decision on whether or not to make the ETO permanent and deciding whether or not any potential improvements described as potentially a possibility should be progressed further.
- 1.3. Officers present this Statement of Case in order to facilitate the Inquiry process. As set out in the Report (see e.g. paras 4.13 and 4.18-4.19), Officers considered that it would be expedient to progress the recommended Order for the following purposes set out or referred to in section 122 of the Road Traffic Regulation Act 1984:
- for avoiding or preventing danger to persons or other traffic using the road;
  - for facilitating the passage on the road of any class of traffic (including pedestrians);
  - 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;
  - for preserving the character of the road where it is specially suitable for use by persons on foot;
  - for preserving or improving the amenities of the area through which the road runs; and

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<sup>1</sup> Camden (Prescribed Routes, Waiting and Loading Restrictions and Parking Places) (No. 1) (Amendment No. 1) Experimental Traffic Order 2016.

- for improving air quality in the borough by, among other measures, implementing the Council’s Clean Air Action Plan.

## **2 The location and surrounding area**

- 2.1. The scheme is located on the Torrington Place / Tavistock Place corridor, between the junctions with Tottenham Court Road and Judd Street, covering Torrington Place / Byng Place / Gordon Square / Tavistock Square / Tavistock Place, hereafter referred to as “the Corridor” (see Plan 1, attached in Annex 13).
- 2.2. The scheme is located within the Bloomsbury area of Camden, an area made up of residential properties, places of employment, local shops and tourist attractions. Torrington Place is at the heart of one of the UK’s largest hospital and university campuses with over 8,000<sup>2</sup> members of staff and an estimated 50,000-60,000 students based at University College London Hospital (UCLH) and the University of London Bloomsbury colleges. The area experiences high numbers of pedestrians and cyclists where recent cycling survey data has shown that the street is the busiest street for cycling in Camden and one of the busiest in London. There is also a weekly (Wednesdays) Farmers Market located in Byng Place which also attracts a large number of pedestrians to the area. Prior to the trial, the corridor served approximately 250 motor vehicles per hour (vph) eastbound and 350 vph westbound in peak hours.
- 2.3. The Corridor forms part of an important east / west cycle link connecting Marylebone, Fitzrovia, Bloomsbury, Kings Cross and Angel. The extent of the scheme forms part of the Seven Stations Link, linking Paddington Station to Liverpool Street station and forms part of the London Cycle Network. More recently, it has been identified as part of the Central London Cycle Grid helping to deliver a cohesive cycle network across central London. TfL’s Strategic Cycling Analysis<sup>3</sup> has identified Torrington Place / Tavistock Place as being in the top 5% for current cycling demand in London.
- 2.4. Torrington Place, at the western end of the scheme, interfaces with the eastern boundary of the West End Project (WEP) (see Plan 2, attached in Annex 14). The West End Project is a committed scheme and designed to transform the Tottenham Court Road area by replacing the heavily congested existing one-way system of Tottenham Court Road and Gower Street with two-way streets. Tottenham Court Road will operate under a bus only restriction between 8am and 7pm and protected cycle tracks will be placed on Gower Street to improve the highway condition for cyclists. The West End Project also incorporates new and improved public spaces where footway widening will improve the overall area for pedestrians. The impacts of this scheme have been

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<sup>2</sup> (University College London Hospitals NHS, 2015/16)

<sup>3</sup> (Transport for London, 2017)

assessed within the design development and appraisal of the Torrington Place / Tavistock Place project. Construction of the WEP is currently planned to commence in January 2018.

- 2.5. Aspirational highway improvement works proposed on Judd Street, at the eastern end of the scheme, interface with the northern extent of Transport for London's (TfL) North-South Cycle Superhighway scheme (NS CSH). The NS CSH scheme (see Plan 3, attached in Annex 15) seeks to improve safety and comfort for cyclists by reducing conflict with motorised traffic. It also provides new and improved pedestrian facilities along the route.
- 2.6. The Torrington Place / Tavistock Place Scheme is also located close to the proposed Brunswick Square Project (see Plan 4, attached in Annex 16). The Brunswick Square Project is largely a public realm improvement scheme that will incorporate additional footway space for pedestrians and a new cycle track. Whilst a decision has yet to be taken as to whether the scheme will go ahead or not, its potential impacts have been assessed as part of the appraisal of the Torrington Place/Tavistock Place project.

### **3 Scheme Description**

- 3.1. Prior to November 2015 the layout of Torrington Place to Tavistock Place consisted of footways on the north and south sides of the highway, a segregated bidirectional cycle track adjacent to the northern footway and two traffic lanes for two-way general traffic in the centre of the highway. See Annex 11 for photographs of the pre-trial layout.
- 3.2. In November 2015, the Council implemented an experimental traffic order (ETO) from Torrington Place to Tavistock Place introducing a trial whereby westbound motor traffic was removed and space was provided for cyclists to travel westbound on the south side of the Corridor to improve the Corridor for walking and cycling. The existing bidirectional cycle track on the north side of the Corridor was converted to a one-way eastbound cycle track. See Annex 12 for diagrams of the trial layout as described above.

### **4 Scheme Need**

- 4.1. The previous layout did not provide sufficient capacity for the numbers of people that 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.
- 4.2. The previous road layout with a two-way protected cycle track and a traffic lane in each direction also did not provide a safe and attractive

environment for the large number of people walking in the area. There are areas where the current footway is very narrow and not comfortable for the numbers of pedestrians. In areas adjacent to Tavistock Square the pavement is less than two metres wide. The narrow footways combined with bidirectional cycle track resulted in a pedestrian environment where pedestrians did not always anticipate a 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. The route also suffered from a poor collision record, relating to collisions between motor vehicles and both cyclists and pedestrians.

- 4.3. The ETO was introduced to address safety concerns along the corridor and to improve provision for cyclists. Additionally, as part of the approval for the WEP, the Council agreed to bring forward proposals for a trial to reduce the impact of through traffic on local residents where initial modelling analysis of the WEP showed through traffic displacing onto the Corridor.

## **5 Policy Framework**

- 5.1. The main policies relevant to the implementation of the Order are set out below with regards to National policy, Mayoral plans and policies (regional / London wide policy) and Camden's approved plans and strategies (local policy).

### *National Policy (Transport)*

- *Cycling and Walking Investment Strategy (April, 2017)*<sup>4</sup>
- *Local Cycling and Walking Infrastructure Plans (2017)*<sup>5</sup>
- *The Draft National Cycling Delivery Plan (2014)*<sup>6</sup>
- *The Infrastructure Act (2015)*<sup>7</sup>

- 5.2. The government uses national transport policy to encourage 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 as 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 (DfT) recently published a Cycling and Walking Investment Strategy<sup>4</sup> and guidance on Local Cycling and Walking Infrastructure Plans<sup>5</sup>. 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, which promote these modes.

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<sup>4</sup> (Department for Transport, 2017)

<sup>5</sup> (Department for Transport, 2017)

<sup>6</sup> (Department for Transport, 2014)

<sup>7</sup> (UK Parliament, 2015)

- 5.3. Other relevant national material included the draft National Cycling Delivery Plan<sup>3</sup> and the Infrastructure Act 2015<sup>7</sup>.
- 5.4. The draft National Cycling Delivery Plan<sup>3</sup> is a 10 year strategy setting out how the government plans to increase cycling across England, which includes an ambition to double cycling levels by 2025. The delivery plan features a number of actions to meet these targets including plans for:
- infrastructure developments
  - cycle-proofing roads
  - wider transport infrastructure
  - facilitating behaviour change across the country by promoting cycling and walking as alternative sustainable travel modes
- 5.5. Under the Infrastructure Act 2015<sup>7</sup>, the government was required to set a cycling and walking investment strategy (CWIS) for England. This sets out a long-term vision for walking and cycling to 2040. The main aim of the CWIS is for walking and cycling to become the norm for short journeys or as part of a longer journey. The first CWIS was published on 21<sup>st</sup> April 2017<sup>4</sup>.
- 5.6. By reallocating road space to cyclists and thus creating a more inviting environment to travel more sustainably, the Scheme encompasses the above national policy by encouraging a modal shift. More emphasis is placed on walking and cycling whilst less is placed on the reliance on private motor transport.

*National Policy (Public Health and Air Quality)*

- *Working Together to Promote Active Travel A briefing for local authorities (2016)*<sup>8</sup>
  - *Healthy People, Healthy Places Programme: Everybody active, every day: a framework to embed physical activity into daily life (October 2014)*<sup>9</sup>
  - *Obesity and the environment briefing: increasing physical activity and active travel (November 2013)*<sup>10</sup>
  - *Air Quality Plan for nitrogen dioxide (NO<sub>2</sub>) in UK (July 2017)*<sup>11</sup>
- 5.7. Working Together to Promote Active Travel A briefing for local authorities<sup>8</sup> 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

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<sup>8</sup> (Public Health England, 2016)

<sup>9</sup> (Public Health England, 2014)

<sup>10</sup> (Public Health England, 2013)

<sup>11</sup> (Department for Environment, Food & Rural Affairs, Department for Transport, 2017)

purpose. It points to substantial ‘win-wins’ that benefit individual people and the community as a whole.

- 5.8. Further Guidance and Advice to local authorities comes from two documents called Public Health England (Healthy People, Healthy Places Programme): Everybody active, every day: a framework to embed physical activity into daily life<sup>9</sup> and Obesity and the environment briefing: increasing physical activity and active travel<sup>10</sup>. They encourage local authorities to create a physical environment where people actively choose to walk and cycle as part of everyday life. The outcomes are cost effective, can have a significant impact on public health and may reduce inequalities in health. This way of thinking is an essential component of a strategic approach to increasing physical activity.
- 5.9. Technical evidence compiled to support the government’s recent Air Quality Plan for NO<sub>2</sub> in UK<sup>11</sup> states that: “Road transport measures are likely to result in the most effective way of improving NO<sub>2</sub> concentrations. This could include: Removal of vehicles from the road by investing in public transport and alternative modes of transport such as walking or cycling.” Road transport emissions account for just under half of Camden’s overall NO<sub>2</sub> emissions.

*Regional / London Wide Policy*

- *Mayor’s Transport Strategy (Draft for Public Consultation – June 2017)*<sup>12</sup>
  - *Mayor’s Environment Strategy (Draft for Public Consultation – August 2017)*<sup>13</sup>
  - *Healthy Streets for London (February 2017)*<sup>14</sup>
  - *A City for all Londoners (October 2016)*<sup>15</sup>
  - *Mayor’s Transport Strategy (April 2010)*<sup>16</sup>
  - *Vision for Cycling (March 2013)*<sup>17</sup>
- 5.10. The Scheme is consistent with London Mayoral policies such as A City for all Londoners<sup>15</sup> the draft Mayor’s Transport Strategy<sup>12</sup> and the draft London Environment Strategy<sup>13</sup> as well as the previous Mayor’s policies and strategies. Key documents in this respect are the Mayor’s Transport Strategy<sup>16</sup> and Vision for Cycling<sup>17</sup>, which sought to deliver ‘safer streets for cycle users.
- 5.11. The current Mayor’s draft Transport Strategy (MTS)<sup>12</sup>, published in June 2017, sets out the Mayor’s draft policies and proposals that aim to reshape the future of London’s transport. It builds on earlier policies, but the Strategy notes that , ‘the success of London’s future transport

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<sup>12</sup> (Greater London Authority, 2017)

<sup>13</sup> (Greater London Authority, 2017)

<sup>14</sup> (Transport for London, 2017)

<sup>15</sup> (Authority, 2016)

<sup>16</sup> (Greater London Authority, 2010)

<sup>17</sup> (Greater London Authority, 2013)

system relies on reducing Londoners' dependency on cars in favour of increased walking, cycling and public transport use'. '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 not only support the health and wellbeing of Londoners, but also the city as a whole by reducing congestion and providing the most efficient use of valuable street space.'

- 5.12. Whilst it is still at a draft stage, at the heart of the new MTS<sup>12</sup> is the 'Healthy Streets' framework; a list of 10 key outcomes which all transport schemes should seek to deliver and against which all schemes will be assessed. Further information relating to Healthy Streets is in the 'Healthy Streets for London<sup>14</sup>' document. This approach is designed to ensure that all transport decisions prioritise human health. 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 and ensuring that all transport schemes improve the conditions for walking and cycling.
- 5.13. The overall approach is to put into practice the theory of reducing car dependency at the same time as increasing active and sustainable travel. In this context, the Strategy establishes a target for modal shift, seeking an increase for all daily trips made by sustainable modes (walking, cycling and public transport) with a corresponding decrease in unsustainable modes – private vehicle, taxis and private hire vehicles. The Scheme is in line with this approach by means of reallocating space from motor vehicles to active and sustainable modes.
- 5.14. Concerns about the quality of London's air and its impact on public health are also well-documented within the MTS and a key aspiration of the draft MTS<sup>12</sup> seeks to increase the share of sustainable modes from 64% to 80% by 2041. This is complimented by the current mayor introducing a toxicity charge (T-charge) in October 2017 and bringing forward and expanding the Ultra Low Emission Zone (ULEZ) initiated by the previous mayor. TfL's modelling suggests that a 2019 introduction of the ULEZ alone will result in 28% reduction in the area of Central London exceeding NO<sub>2</sub> limit values, with roadside concentrations reducing on average by around 5%<sup>18</sup>. Mayor's Air Quality funding has also been made available to expand cycling and walking infrastructure in London, recognising its potential to encourage the switch from motorised modes for short journeys.
- 5.15. The Scheme supports people who choose to walk, cycle and use public transport whilst encouraging others that do not already do so by increasing comfort and the feeling of safety. Reducing private vehicle use and inducing a modal shift to more sustainable transport

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<sup>18</sup> (Transport for London, 2017)



contributes to the Mayor's overarching vision of encouraging active travel and improving London's air quality.

#### *Local Policy*

- *Camden Transport Strategy (August 2011)*<sup>19</sup>
- *The Camden Plan (2012)*<sup>20</sup>
- *The Public Health Outcomes Framework (February 2017)*<sup>21</sup>
- *Camden's Joint Health and Wellbeing Strategy (January 2016)*<sup>22</sup>
- *Camden's Clean Air Action Plan (2016-18)*<sup>23</sup>

- 5.16. The Camden Transport Strategy (CTS)<sup>19</sup> sets out the future direction for transport in Camden and describes the context of traffic and transport in the borough. Primarily, the strategy seeks to encourage sustainable and active modes of transport and reduce the negative effects of motor traffic on the environment. Addressing the negative impacts of transport and the health challenges that they present is a high priority for the Council.
- 5.17. Objectives, set out in the CTS<sup>19</sup>, seek to encourage healthy and sustainable travel by prioritising walking, cycling and public transport in Camden whilst ensuring the development and maintenance of high quality, accessible public streets and spaces recognising that streets are about more than movement. The strategy seeks to invoke a modal shift to more sustainable modes and aims to increase cycle modal share to 8% by 2026. The CTS<sup>19</sup> seeks to 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'. The CTS<sup>19</sup> also seeks to manage congestion, improve reliability and ensure the efficient movement of goods and people.
- 5.18. In addition, Policy 1.3 of the CTS<sup>19</sup> adopts a road user hierarchy. This is used as a tool in developing projects and identifies pedestrians and cyclists as the priority road users within that hierarchy.
- 5.19. The Scheme supports the key objectives outlined in CTS<sup>19</sup>. Alterations to the existing layout have resulted in improvements that not only improve the experience of existing users but have also created a more inviting environment that has encouraged new cyclists and cycle trips. Reallocating carriageway to cyclists, removal of the unconventional bidirectional cycle track road layout and reducing traffic on the Corridor has also improved the environment for pedestrians and has encouraged walking. The Scheme supports the most socially inclusive means of transport, as walking and cycling are the lowest cost modes. By providing more cycling capacity on the Corridor, people will be better able to access local services.

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<sup>19</sup> (The London Borough of Camden, 2011)

<sup>20</sup> (The London Borough of Camden, 2012)

<sup>21</sup> (Public Health England, 2017)

<sup>22</sup> (The London Borough of Camden, NHS, 2016)

<sup>23</sup> (The London Borough of Camden, 2016)

- 5.20. The Camden Plan<sup>20</sup> is a corporate vision for the borough, which sets out how the Council wish to make Camden a better borough by 2017.
- 5.21. The Scheme meets two of the core objectives of the Camden Plan<sup>20</sup> as it contributes to conditions for and harnessing the benefits of economic growth, and allows investing in our communities to ensure sustainable neighbourhoods. The additional capacity provided by the trial's wider cycle lanes and the removal of bidirectional track supports the anticipated growth in cyclists and pedestrians to the area that are resulting from both local development and institutional expansion, and growth in the wider Borough. Investing in improving the Corridor will not only help to sustain existing levels of sustainable travel but will further encourage new cyclists and pedestrians.
- 5.22. The Camden Plan<sup>20</sup> also has a strong emphasis on reducing inequality, including inequality in health outcomes. Some of Camden's most deprived communities live in areas where traffic volumes and pollution are highest. The redistribution of traffic has some negative impacts on certain streets but has had significant benefits on others particularly along the Corridor. Further, more deprived communities are more likely to rely on cheaper travel options, such as walking, cycling and public transport to access education, jobs and essential services.
- 5.23. Camden's Joint Health and Wellbeing Strategy<sup>22</sup> stresses the importance of an environment that encourages residents to be physically active as part of their daily lives.
- 5.24. The Public Health Outcomes Framework<sup>21</sup> assists in assessing how effectively the activities of each local authority are addressing the determinants of health. 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 to limit motor vehicle use for inessential journeys to reduce the negative impacts of motor traffic.
- 5.25. Removing the barriers which deter people from making active, sustainable travel choices is integral to the Council's approach, particularly improving road safety/reducing casualties and addressing the perception of road danger. Providing high quality, safe and appealing environments along the Corridor is vital in enabling more people from all walks of life, of all ages and abilities, to walk, cycle and to provide access to public transport. Making these travel options and the health benefits they bring, more accessible will in turn encourage people to shift to more active sustainable travel choices.
- 5.26. Camden's Clean Air Action Plan<sup>23</sup> is a statutory document produced as part of Camden's responsibilities for an Air Quality Management Area. It contains a number of actions and priorities to help Camden reach compliance with air quality Objective levels as soon as possible. Road

transport accounts for around half of Camden's nitrogen dioxide (NO<sub>2</sub>) and Particulate (including PM<sub>10</sub>) pollution. The Scheme, with its emphasis on modal shift and improving the local environment for walking and cycling, helps towards meeting the key objectives of the Clean Air Action Plan.

- 5.27. Camden is not acting alone in seeking to improve poor air quality. There are complimentary actions required not just at a local level but also by regional and national Government. In particular, the Mayor of London has the power to reduce emissions from buses and taxis, and also to implement road charging measures (or 'clean air zones') such as the Ultra Low Emission Zone and T-charge, which has been highlighted by national Government as among the most effective policy tools to improve air quality in urban areas overall by reducing the amount of polluting motor vehicle traffic<sup>11</sup>.

## **6 Process and Consultation**

### *Process*

- 6.1. In November 2015 the scheme was implemented as a trial through an experimental traffic order. For the reasons set out in the Cabinet Member Report, steps are being taken to progress a permanent traffic order. The experimental traffic order was due to expire in May 2017, but was extended to November 2017 by the Secretary of State, to allow for this public inquiry to be held.

### *Initial Trial Feedback*

- 6.2. Prior to the formal consultation process, stakeholders were invited to provide feedback to the Council to form part of the ongoing review of the trial impacts. Over 1,400 respondents provided feedback during the period between the trial being implemented and the public consultation to which Council officers were able to, where possible, address concerns and respond to enquiries. This feedback, together with the Council's own observations and data collection, enabled the Council to modify some of the features to address concerns that arose during the trial, and informed the proposals set out in the public consultation. Examples of modifications made during the trial include removal of some Orcas (small blocks positioned in the carriageway to segregate the southbound cycle track from vehicular traffic) in informal crossing areas for pedestrians, removal of an unnecessary bollard in the cycle lane, introduction of additional signage together with alterations to road markings for way-finding purposes.
- 6.3. Feedback received during the trial included responses from residents, employees at local businesses, hospitals, university staff and students, taxi drivers, businesses and charities and stakeholder groups. Responses were also received from cyclists, pedestrians and motorists passing through the area. Further information on the responses received is set out in the Council's Cabinet Report in its Appendix B.

## *Public Consultation*

- 6.4. A formal public consultation 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. Two drop-in sessions were held in the Town Hall for members of the public to attend and furthermore, Councillors and officers attended public meetings, adverts were placed in the local press, articles were published in the Camden magazine, and awareness was raised through the Council's Facebook and Twitter services.
- 6.5. A total of 15,096 verifiable responses were received from residents, local businesses and employees and others who use the route. 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 whether people would want the street returned to its pre-trial layout, 79% responded 'no'.
- 6.6. Of the 2219 respondents resident in Camden, 1618 (73%) supported retaining the current street layout, 575 (26%) did not support keeping the street layout and 26 (1%) expressed no opinion. Residents who identified as living within the WC1 area were also overall in favour of making the trial layout permanent with 56% supporting the scheme.
- 6.7. Statutory consultees and other key stakeholders, were consulted in relation to both the ETO and also for the potential permanent scheme. Responses have been received from a number of organisations and contact has been maintained with several groups since the implementation of the trial. Meetings were also held between the Council and objecting stakeholders to consider the issues presented by these groups. Further information on consultation responses is set out in the Council's Cabinet Report in its Appendix C.

## **7 Scheme impacts**

### *Impact on general motor traffic*

- 7.1. 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. The rationale behind not providing a continuous eastbound or westbound link between Tottenham Court Road and Hunter Street is to avoid attracting 'through traffic' and more strategic motor traffic from the Transport for London Road Network (Euston Road) onto the more local road network.

- 7.2. 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.
- 7.3. The comparative traffic impact of the trial compared with potential alternatives has been assessed with the aid of traffic modelling undertaken by transport consultants (Systra) appointed by Camden.
- 7.4. The conversion of the carriageway from two-way working to one-way working for motor traffic inevitably changed some traffic patterns in the area. Removing traffic from the corridor appears to have displaced some motor traffic to Endsleigh Gardens as this a natural desire line for vehicles to link to Euston Road forming an alternative westbound route. Additionally, anecdotal evidence suggests that the trial layout has led to an increase in journey times for motor vehicles. Whilst the trial restricts the east-west link between Tottenham Court Road and Hunter Street, the layout does not make the journey impossible although it will be less direct.

#### *Impact on Pedestrians*

- 7.5. Ahead of formal publication by Transport for London, Camden have sought draft collision data for the most recent data available in the time period over which the Scheme has been in place. This indicates that both serious and slight pedestrian casualties have reduced to zero.
- 7.6. The Scheme layout has increased pedestrian comfort by making the road layout easier to use and a safer environment for pedestrians. There are further improvements to Pedestrian Comfort Levels<sup>24</sup> which can be made if the Scheme is made permanent. There is scope within the current layout to increase footway widths and/or to relocate existing street furniture to improve comfort levels. The Scheme layout also allows the flexibility to reallocate carriageway space to footways whilst retaining the recommended minimum lane widths and cycle lanes wide enough to cope with the flows.
- 7.7. In addition to the potential for footway improvements between junctions, there is also scope to improve the footways at the junctions themselves, which will further improve the safety of the junction by reducing vehicular speeds and reducing the crossing distance pedestrians must undertake. Other measures such as pedestrian countdown timers on the traffic signals along the Corridor could also improve the environment for pedestrians.

#### *Impact on cycling*

- 7.8. As noted in section 3 the pre-trial layout was insufficient to cope with the high flows of cyclists along the Corridor. The Scheme has resulted

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<sup>24</sup> (Transport for London, 2010)

in a marked increase of cycle trips (up to 52% during peak hours). Early indications from draft collision data suggest an increase in accidents involving cyclists, but that the severity of injuries has reduced, with none reported as 'serious'. Given the increased width of cycle lane, it appears that cyclists' speed may sometimes have been a contributory factor. If so, there is scope to further improve the safety at junctions by, for example, raised entry treatments to reduce the speed of both motor vehicles and cyclists.

- 7.9. The removal of the bidirectional track and increase in cycle lane width has also removed cyclist conflict when cyclists are travelling in opposing directions or when trying to overtake one another. The provisional collision data suggests that these type of collisions have reduced to zero.
- 7.10. The Cycling Level of Service (CLOs)<sup>25</sup> score for the Scheme layout has more than doubled its preceding score. The CLOs assessment areas which have benefited the greatest from the Scheme layout are 'safety' and 'comfort.'

#### *Impact on public health*

- 7.11. The Scheme layout is in line with the Camden Transport Strategy to promote modal shift towards active modes of travel through the provision of an improved environment for pedestrians and cyclists. The increase in walking and cycling has numerous benefits to public health including:
- Improving air quality through reduction in car use with direct impact on physical health
  - Promoting walking and cycling which are associated with a range of benefits for physical and mental health
  - Creating safer street environments for all
  - Contributing to meeting carbon emissions targets and the long term health benefits of tackling climate change

#### *Impact on air quality*

- 7.12. The main impact on local air quality is a reduction in vehicle emissions. The Scheme layout has significantly improved air quality along the Corridor; in addition to the Camden's fixed monitor at Russel Square, monitoring was undertaken at two further sites along the Corridor before and after the introduction of the Scheme. Additional monitoring was also undertaken after the Scheme's introduction on two local roads, to supplement statutory monitoring already taking place in the area. 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, there are exceptions, such as Endsleigh Gardens where displaced traffic may be adding to pollution levels. However it is

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<sup>25</sup> (Transport for London, 2014)

considered that the improvements to air quality in the Corridor more than offset a reduction in air quality on a limited number of other local roads, especially given the increased numbers of pedestrians and cyclists benefiting from better air quality by using the Corridor. National and Mayoral initiatives are expected to ameliorate to some extent any residual reduction in air quality.

- 7.13. 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.
- 7.14. While future policy interventions by regional government will have a larger impact on air quality levels in Central London (such as the Mayor's of London's ULEZ)<sup>18</sup>, modelling of future air quality levels include impacts of local schemes which aim to encourage modal shift and a move away from motor vehicles. The reduction in pollution levels along the Corridor and likely overall decrease in the amount of traffic in the area means that the Scheme can be considered to meet Camden's objectives in its Clean Air Action Plan<sup>23</sup> to try and reach compliance with air quality Objective levels as soon as possible.

#### *Equalities impact*

- 7.15. The Cabinet Report included an Equalities Impact Assessment (EIA) at its Appendix E which showed positive outcomes for a number of protected groups and also identified negative impacts for certain protected groups. In particular disabled people were considered and the need to make changes to ensure the proposal would not discriminate and / or that all appropriate opportunities to advance equality of opportunity and foster good relations would be taken. The strategy for measures to mitigate negative impacts includes incorporating some suggestions made as part of the public consultation, such as investigating ways to improve delineation between cyclists and pedestrians on Byng Place and improve visibility for cyclists and pedestrians on zebra crossings along the Corridor.
- 7.16. The EIA notes that consultation feedback suggested the pre-trial, narrow track excluded users with non-standard cycles and less confident cyclists, such as young people and pregnant women, as people were fearful of becoming stuck, causing an accident or prohibiting other cyclists passing. The pre-trial bidirectional 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 can encourage more cycling of people from protected groups, such as disabled and older people, since the wider cycle lanes enable a different type of person to cycle. 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.

- 7.17. Other consultation feedback on the trial-layout suggested that vulnerable road users, such as blind or partially sighted people, may trip over the Orca's or would not be able to delineate between the kerb and the vehicular carriageway if any future measures such as a raised table were to be introduced. The Council has considered concerns such as these and if the trial were to remain permanent, and will continue to work on resolving the issues raised if a new scheme were to be introduced. Some other feedback from public engagement showed there were concerns with lack of taxi drop off and pick up areas and that this was discriminatory against disabled people using taxis. The Council have incorporated a dedicated taxi rank along the route enabling taxi's to arrive at the kerb side so disabled users can use the disabled loading facilities on this side of the vehicle.
- 7.18. The Equalities Impact Assessment concluded that the positive impacts of the Scheme upon groups with protected characteristics outweighed the negative impacts on those groups. This conclusion was reflected in the Cabinet Report, which in addition considered the Council's duties as a road traffic authority under section 29 of the Equalities Act 2010<sup>26</sup> including its duty, where appropriate, to make reasonable adjustments in particular for disabled persons.
- 7.19. The Council will continue to consult and engage with groups representing people with protected characteristics (including RNIB and Guide Dogs) on scheme proposals in the area as well as at the detailed design stage within the Corridor, should a decision be made to retain the current layout and make improvements.

## **8 Consideration of alternatives**

- 8.1 Throughout the design process different design options were considered. At the outset of the project the options considered included (amongst other options):
- a. Eastbound traffic only along the whole corridor
  - b. Westbound traffic only along the whole corridor
  - c. Timed closure (closed to traffic between 7am and 7pm)
  - d. Widening the bi-directional track and retain two-way traffic
  - e. Removing all traffic aside from access for residents and servicing
- 8.2 It was considered that either enforcing a timed closure or removing all traffic aside from access would result in a significant increase in traffic on other local streets and were therefore not acceptable options.

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<sup>26</sup> (UK Parliament, 2010)



- 8.3 The assessment of the remaining options resulted in the preferred option as set out in section 3 being identified and taken forward as the trial scheme.
- 8.4 As described in Appendix D to the Cabinet Report, and further to the above, the Council considered a number of further alternatives that were suggested by the Bloomsbury Residents' Action Group (BRAG), Imperial Hotels (IHL) and the London Taxi Driver's Association (LTDA) during the public consultation.

*BRAG (i) Suggested Alternative*

- 8.5 The BRAG put forward an alternative layout including two-way traffic and with-flow cycle lanes. This option would enhance motor vehicle access along the corridor when compared to the trial layout, however, the layout does not meet desirable minimum standards for footway, cycle lane or carriageway widths.

*BRAG (ii) Suggested Alternative*

- 8.6 Subsequently BRAG suggested a further alternative which was to make a short section (from Bedford Way to Byng Place) two-way. This option does provide sufficient road width to accommodate the cycle lanes and two-way traffic. However, it does not leave any room to widen the footway in the section by Tavistock Square that currently has narrow footways and which would greatly benefit from footway widening.

*Trial Traffic Reversal*

- 8.7 A suggestion has also been made that the one-way vehicular traffic flow should be reversed so that it runs in a westbound direction. Broadly speaking this could achieve one objective of reducing motor traffic along the corridor, but a comparative modelling exercise indicated a greater level of reassignment to more local roads.

## **9 Conclusions**

- 9.1 The Scheme layout represents the best overall option taking into account the need to address previous capacity and safety issues for cyclists and pedestrians.
- 9.2 The Scheme sets to create a shift from reliance on motor vehicles to more sustainable transport in response to key aspirations set out in National Policy. It is in line with both London Mayoral policies together with Camden's own local policies in that the reallocation of space will favour the active, sustainable modes of walking and cycling thereby

improving the quality of the environment for existing users whilst encouraging people to take up these modes.

- 9.3 During public consultation on the experimental layout in November 2016, over 79% of consultation respondents supported the scheme expressing a preference to retain the two separate cycle lanes and one-way motor traffic flow.
- 9.4 Whilst some traffic has inevitably displaced onto surrounding streets, the overall impact of traffic in the area is minimal as rather than local roads, the majority of traffic is diverted to more strategic roads, such as Euston Road and Grays Inn Road, which are considered more suitable to cope with this type of vehicle. In the absence of the trial the local area would see a greater influx of traffic resulting from the West End Project, further warranting the vitality of the scheme. Continuing the current trial traffic arrangements, compared to the alternatives suggested, will serve to reduce through traffic on the Corridor as indicated by modelling keeping traffic largely to the most appropriate routes and improving the local environment. Reasonable access to premises is maintained under the trial layout, although it is recognised that, with the westbound traffic movement removed, some journeys may take longer, particularly during peak hours.
- 9.5 The Scheme is located within an area of central London which suffers from poor air quality. Air quality on the Corridor has improved as a result of the Scheme creating a more attractive environment for the large numbers of pedestrians and cyclists using the Corridor daily. Whilst there appears to have been some localised disbenefits in terms of air quality, the overall benefits from the scheme outweigh some localised negatives.
- 9.6 More efficient use of the limited carriageway space will not only deliver environmental 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.

## **10 Annexes**

1. London Borough of Camden, Officers' Report to Cabinet, 13th February 2017.
2. Appendix A to Officers' Report: Legal Implications (comments from the Borough Solicitor).
3. Appendix B to Officers' Report: Pre-consultation stakeholder feedback.
4. Appendix C to Officers' Report: Consultation responses: results and discussion.
5. Appendix D to Officers' Report: Highway layout and traffic assessments of Alternative Scheme Proposals.
6. Appendix E to Officers' Report: Torrington Tavistock Trial Equality Impact Assessment.

7. Appendix F to Officers' Report: Public Health, Physical Activity and Air Quality – supporting information.
8. Appendix G (i) to Officers' Report: LTDA campaign.
9. Appendix G (ii) to Officers' Report: Camden Cyclists' campaign material.
10. Appendix H to Officers' Report: Bloomsbury Residents' Action Group Petition Cover Sheets, 20th December 2016.
11. London Borough of Camden Information Leaflet, October 2015.
12. Location and effect of Proposed Traffic Order: Maps 1 – 4, 11th May 2017.
13. Plan 1: Torrington Tavistock Trial Location, August 2017.
14. Plan 2: West End Project Location, August 2017.
15. Plan 3: North South Cycle Super Highway Location, August 2017.
16. Plan 4: Brunswick Square Scheme Location, August 2017.

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