

NON-KEY EXECUTIVE OFFICER REPORT

LONDON BOROUGH OF CAMDEN	WARDS: Regent's Park; Camden Town with Primrose Hill
REPORT TITLE COVID-19: enabling safe travel in Camden – Amendments to Arlington Road Area Low Traffic Neighbourhood Scheme	
REPORT OF Strategic Lead Transport Planning	
FOR SUBMISSION TO Director of Environment and Sustainability	DATE 15 January 2021
SUMMARY OF REPORT <p>This report seeks approval from the Director of Environment and Sustainability for amendments to the Arlington Road Area Low Traffic Neighbourhood (LTN). The amendments concern a motor vehicle access restriction from Inverness Street into Arlington Road. The proposed amendments concern i) the replacement of the existing motor vehicle entry restriction at Mornington Place junction with Mornington Crescent, with a motor vehicle traffic restriction at the junction with Clarkson Row/Mornington Terrace and ii) the conversion of 'Paid for' parking spaces to 'Shared' parking spaces on Albert Street, Arlington Road and Mornington Street, so that both permit holders in the CPZ zone and those seeking to use 'paid for' parking bays can use these bays to park. The proposed amendments constitute a direct response to comments received from the public during the trial period for the Arlington Road Area LTN. Should a decision be taken to proceed with the proposed measures, these would be implemented by an Experimental Traffic Order amending the existing Experimental Traffic Order.</p> <p>The aims of the amendments are aligned to the aims of the Arlington Road Area LTN, outlined in a previous Officer Decision Report. The proposed parking changes aim to balance the geographic demand for residents' parking spaces with the need for paid for spaces for visitors in the area. The proposals meet the objectives of Our Camden Plan by creating clean, vibrant and sustainable places and making it easier for people to travel more on foot or by bicycle.</p> <p>Local Government Act 1972 – Access to Information</p> <p>The following documents has been used in the preparation of this report: COVID-19 response: enabling safe travel in Camden (SC/2020/74); Traffic Management Act 2004: network management in response to COVID-19</p> <p>COVID-19: enabling safe travel in Camden - Arlington Road Area Low Traffic Neighbourhood Scheme</p> <p>Contact Officer: Karl Brierley, Principal Transport Planner 5th Floor, 5 Pancras Square, London, N1C 4AG020 7974 5297 Karl.brierley@Camden.gov.uk</p>	
RECOMMENDATIONS <p>That the Director of Environment and Sustainability, having considered the proposals in relation to the objectives set out in the Report 'COVID-19 response: enabling safe travel in Camden', and Camden Council's powers under Section 9 of the Road Traffic Regulation Act 1984, approves the proposals set out in section 2 of this report.</p>	

Signed:



Sam Margolis, Strategic Lead Transport Planning

Date: 15/01/2021

1. CONTEXT AND BACKGROUND

- 1.1 This report follows on from the Report of the Executive Director Supporting Communities, entitled “COVID-19 response, enabling safe travel in Camden ([SC/2020/74](#))”, which was approved on 13/05/20 by the Cabinet Member for a Sustainable Camden and is submitted to the Director of Environment and Sustainability for consideration, pursuant to Recommendation 6 and paragraph 1.20 (i) of that report in particular.
- 1.2 This report also follows on from the [‘COVID-19: enabling safe travel in Camden - Arlington Road Area Low Traffic Neighbourhood Scheme’](#) Decision Report, which was approved on 17/09/20 by the Director of Environment and Sustainability to implement the Arlington Road Area Low Traffic Neighbourhood (LTN) as a “trial” under an Experimental Traffic Order.
- 1.3 The DfT issued statutory guidance on 13th May 2020 ‘Traffic Management Act 2004: network management in response to COVID-19’; which requires local authorities to reallocate road space to walking and cycling, by – among other measures – installing modal filters (also known as filtered permeability); closing roads to motor traffic to reduce through traffic levels creating a more pleasant environment that encourages people to walk and cycle, and improving safety.
- 1.4 In line with the replacement DfT guidance of 13th November 2020, all new and amended Safe and Healthy Street schemes, including the additional scheme in and the amendments to Arlington Road Area LTN within this report, have been subject to a public consultation prior to a decision being made on whether or not to implement the proposals.
- 1.5 The Council conducted a public consultation on the proposed amendments to the Arlington Road Area LTN between 14 December and 21 December 2020. This report sets out the results of the public consultation and outlines the feedback received and Officers’ responses to the feedback and contains recommendations on the proposals to proceed with.
- 1.6 Consultation materials can be found in Appendix A of this report and a summary of the results of the consultation, as well a summary of the comments received, including Officers’ responses to the comments, can be found in Appendix B. The key proposals which Officers are seeking a decision on are outlined in table 1 in section 2.1.

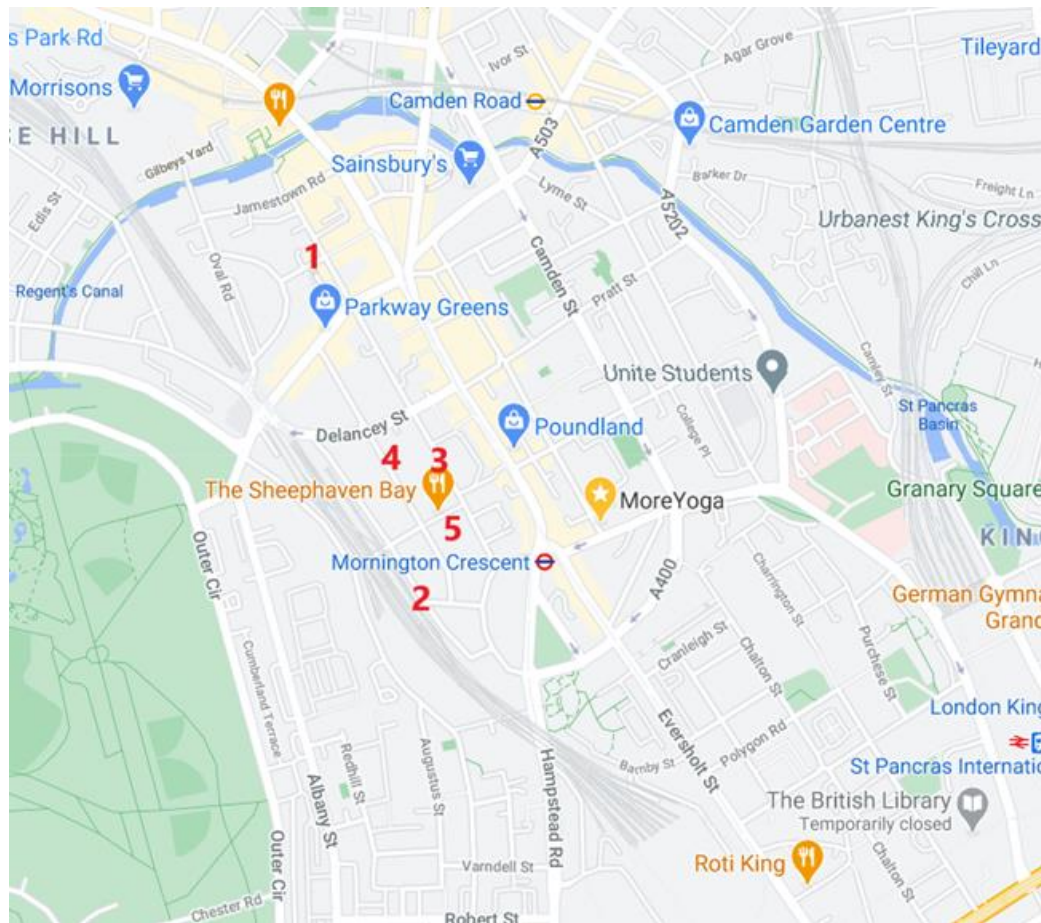
2. PROPOSALS AND REASONS

- 2.1 As part of the COVID-19 safer travel programme, Officers are proposing the following additional measure on Inverness Street and amendments to the Arlington Road Area LTN scheme. The proposed amendments to parking and the scheme on Inverness St constitute a direct response to comments received from the public during the trial period for the Arlington Road Area LTN. An overview of the proposals is included below in Table 1 and Figure 1, and each of the proposals - and the rationale for them - is set out in more detail in section 2.5 onwards.

Table 1 - Overview of the proposed amendments to Arlington Road Area Low Traffic Neighbourhood

Figure Ref.	Location	Proposal	Appendix Ref
1	Inverness St junction with Arlington Road	No access for motor vehicles from Inverness Street to Arlington Road	C
2	Mornington Place	<p>Removing existing no access restriction for motor vehicles from Mornington Crescent into Mornington Place</p> <p>Install a restriction on motor vehicle traffic movements, in both directions, into and out of Mornington Place junction with Clarkson Row/Mornington Terrace</p> <p>Amendments to parking spaces on Mornington Place and Mornington Terrace in line with the above proposals, as set out in detail in section 2.4</p>	D
3	Arlington Road, south of Delancey St	Convert 27.4m of parking spaces, on the east side of Arlington Road, between Delancey St and Mornington St, from 'Paid for' to 'Shared'	E
4	Albert St, south of Delancey St	Convert 4 parking spaces on the east side of Albert St, south of Delancey St, from 'Paid for' to 'Shared'	E
5	Mornington Street	Convert 32.7m of parking spaces on the south side of Mornington Street from 'Paid for' to 'Shared'	E

Figure 1 - Scheme Map



2.2 The proposed changes to the Arlington Road Area LTN scheme have been assessed against the same criteria used in the report COVID-19 response, enabling safe travel in Camden ([SC/2020/74](#)). The criteria and how they fit with the proposals are available in Appendix G of [COVID-19: enabling safe travel in Camden - Arlington Road Area Low Traffic Neighbourhood Scheme report](#).

2.3 Furthermore, following the implementation of the Arlington Road Area LTN scheme, emails received from stakeholders to the 'Safe Travel' email inbox have provided a high concentration of comments around the following issues that are pertinent to this decision report:

- Traffic volumes on Gloucester Crescent and Inverness Street
- Availability of residents' parking spaces in the streets south of Delancey St, in relation to the location of the measures implemented to restrict through-traffic

2.4 Proposals

(i) Changes to Arlington Road Area LTN scheme – Overview

In direct response to the concerns raised via email and via the [project engagement page](#) of emails received, from the local community, on measures introduced via the "Arlington Road Area Low Traffic Neighbourhood", Officers have prepared proposals for changes as set out below.

These proposals are subject to approval processes as set out in Single Member decision report [SC/2020/74](#).

(ii) Proposed changes – Arlington Road Area LTN – Scheme & Design (for scheme drawings, see Appendix C-E)

1. Scheme Name: Inverness Street

Location: Inverness Street junction with Arlington Road (Appendix C)

Proposals: Motor vehicle access restriction from Inverness Street to Arlington Road.

Post implementation of the Jamestown Road measure of the Arlington Road Area Low Traffic Neighbourhood local stakeholders have highlighted that motor vehicles are continuing to use Gloucester Crescent and Inverness Street as a cut through to access Arlington Road and Parkway. 24-hour traffic counts from 2019, available in Appendix F, show that an average of 1080 vehicles per day proceeded east along Gloucester Crescent (between the southern junction with Oval Road and Inverness Street). Traffic counts conducted in December 2020 show that a similar volume of vehicles per day (1104 and 962 per average day across two consecutive weeks) proceeded east along Gloucester Crescent (between the southern junction with Oval Road and Inverness Street). These counts also show that the number of vehicles travelled east on Inverness Street, between Gloucester Crescent and Arlington Road (1161 and 1038 vehicles per average day), is similar to the number of vehicles that proceeded east along Gloucester Crescent. While the pre- and post-installation counts on Gloucester Crescent shows that volumes have not seen a significant change post installation of the Jamestown Road measure, resident concerns of ongoing issues with this volume of traffic are recognised, especially in light of the location of the Cavendish School on Inverness Street. Inverness Street offers a connection between Gloucester Crescent and Arlington Road.

An Automatic Number Plate Recognition Camera enforced motor vehicle restriction, that would prohibit access to Arlington Road, from Inverness Street, is proposed. This proposal will reduce the volumes of traffic on Inverness Street and Gloucester Crescent as no access will be available for motor vehicles to Arlington Road from Inverness Street. Emergency service vehicles, refuse vehicles and cycles would be allowed to pass through the restriction. Access by motor vehicles into Inverness Street from Arlington Road would not be affected. As outlined in section 6.2 of this report, Officers had initially proposed a restriction on motor vehicles movements in both directions on Inverness Street. However, after engagement with residents a restriction on access to Arlington Road from Inverness street was brought forward for consultation.

To improve safety and visibility at the junctions, the proposal includes:

- The extension and upgrade of single yellow lines to double yellow lines with double kerb blips at the Inverness Street junction with Arlington Road and
- The upgrade of single yellow lines to double yellow lines at the Inverness Street junction with Gloucester Crescent (refer to Appendix C)

The restriction will be enforced via a camera, 'No Motor Vehicles' signs and planters, to narrow the carriageway on Inverness Street. To facilitate the introduction of double yellow lines with double kerb blips at the Inverness Street junction with Arlington Road, the relocation of the following parking spaces will be required:

- 1 resident permit holder's parking space on Inverness Street and 3 resident permit holders' parking spaces on Arlington Road, south of the junction with Inverness Street, will be relocated to Inverness Street and to Gloucester Crescent and
- 3 market traders' parking spaces on Inverness Street will be relocated to Arlington Road, south of the junction with Inverness Street (refer to Appendix C)

However, there will be no net loss or gain of parking provision.

2. Scheme name: Mornington Place

Location: Mornington Place (Appendix D)

Proposal: Remove motor vehicle entry restriction introduced as part of Arlington Road Area LTN at the junction of Mornington Crescent and replace with motor vehicle traffic restriction at the junction with Clarkson Row/Mornington Terrace

Post installation of the no access for motor vehicles from Mornington Crescent into Mornington Place, Officers conducted site visits to assess the scheme. This no access scheme is outlined in Appendix E of the [COVID-19: enabling safe travel in Camden - Arlington Road Area Low Traffic Neighbourhood Scheme](#). On these site visits, it was observed that the majority of motor vehicles were contravening the signage at this location. This places vulnerable road users, such as those on foot or on bike, at this junction at risk as they may not be expecting a motor vehicle to be approaching from the Mornington Crescent direction due to the restriction.

Officers assessed various options to reduce this road safety risk for the most vulnerable users, including the use of ANRP camera enforcement of the existing no access restriction on Mornington Place. However, at this location emergency services access routes are available both in the immediate vicinity to the north and south. Therefore, Officers propose to remove the existing no access restriction on Mornington Place and replace with a full restriction to motor vehicles on the Mornington Place junction with Clarkson Row/Mornington Terrace.

The proposed restriction would prevent motor vehicles movements into and out of Mornington Place at the junction with Mornington Terrace/Clarkson Row. Motor vehicles will be able to enter Mornington Place from Mornington Crescent.

The restriction will be enforced via 'No Motor Vehicle' signs, planters, and droppable bollards on Mornington Place. To improve safety and visibility at the Mornington Place junction with Clarkson Row/Mornington Terrace, the relocation of 1 resident permit holder's parking space from the northern side of Mornington Place to the western side of Mornington Terrace will be required. The space currently allocated to parking on Mornington Place will be converted

to double yellow lines with double blips (design available in Appendix D). However, there will be no net loss of parking provision associated with this change.

This proposal also includes the reinstatement of 11.8m of residents' parking spaces (2 parking spaces), replacing the existing double yellow lines, on Mornington Place that were removed as part of the original scheme, which is proposed to be removed. Moreover, it includes the removal of double blips on Mornington Terrace, directly opposite of the proposed filter (design in Appendix D).

Additionally, based on comments received on parking issues as part of the engagement to date, during the ETO period, it is proposed to make the following amendments to parking arrangements on Mornington Place:

- Convert 3 existing 'Paid for' parking spaces (15m) on the northern side of Mornington Place to 'Shared' parking spaces, so that both permit holders in the CPZ zone and those seeking to use 'paid for' parking bays can use these bays to park
- Introduce 5m of 'Shared' parking space on the northern side of Mornington Place to replace the existing Single Yellow Line

3. Scheme name: Parking amendments (see Appendix E)

Locations: a) Arlington Road, south of Delancey Street
b) Albert Street, south of Delancey Street
c) Mornington Street

Proposals: a) Convert 27.4m of parking spaces on the east side of Arlington Road, between Delancey St and Mornington St, from 'Paid for' parking to 'Shared' parking spaces for Resident Permit Parking holders and Paid for Parking.

b) Convert 4 parking spaces on Albert St, south of Delancey St, from 'Paid for' to 'Shared' parking spaces.

c) Convert 32.7m of parking spaces on the south side of Mornington Street, from 'Paid for' to 'Shared' parking spaces.

Post installation of the Arlington Road Area LTN Officers have received feedback from residents via email, on the commonplace platform and in meetings directly with residents. This feedback highlighted issues around the availability of resident parking spaces due to the location of the measures introduced via the Arlington Road Area LTN. Feedback has highlighted that many of the paid for parking bays in the area are often empty and that enabling residents to have the opportunity to park in these bays would reduce the need to drive from one side of a traffic restriction to the other to find available parking. While Controlled Parking Zone (CPZ) permits holders for this area retain the ability to park anywhere in the CPZ, the location of paid for parking bays in the area reduce the availability of parking spaces for CPZ permit holders.

Officers propose the above listed changes to parking arrangements in Arlington Road Area to provide additional parking opportunities for CPZ permit holders while retaining the option for 'Paid for' parking.

(iii) Proposed implementation method

These proposals, subject to approval being given, will be implemented via an amendment to the existing Arlington Road Area LTN Experimental Traffic Order (ETO) which is being implemented under Section 9 of the Road Traffic Regulation Act 1984).

The ETO which these proposals seek to amend will be in place for 18 months post installation date, of which nearly four months have now passed as the ETO came into force on 24th September 2020. The Council will carry out a full public consultation after the ETO has run for 12 months, post 24th September 2020. This consultation will – together with other relevant information, e.g., monitoring data - then inform the Council's decision as to whether, at the end of the 18-month experiment, the experimental scheme should be made permanent (and, if so, whether with or without changes) or allowed to lapse at the end of the 18-month experimental period. As outlined in the Arlington Road Area LTN decision report, traffic and air quality will be monitored across the area, as required, on relevant streets.

(iv) Cost and funding source

The estimated cost of the scheme including the ANPR camera, droppable bollards, planters, design, project management and other staff costs, plus the costs of Road Safety Audits, notification letters (printing/distribution costs), signage and advertising of the ETO, is expected by no more than £80,000. Funding sources are outlined in section 7.

(v) Notification/letter drop area – all properties within red area shown in Figure 2

All the properties within the red area shown in Figure 2 below will receive information about the changes prior to implementation. The information will contain why these changes are being made and will include details of how stakeholders can give feedback during the ETO period

3.3 Proceeding with the proposed measures will assist Camden to:

- Deliver its transport response to the COVID-19 pandemic
- Meet its transport policy objectives through prioritising active and sustainable modes of travel
- Address road safety issues along Inverness Street and Mornington Place
- Deliver the recommendations made by Citizen's Assembly on the Climate Crisis
- Contribute towards meeting the objectives of Our Camden Plan
- Act on feedback received from local stakeholders in relation to an existing Experimental Traffic Order and
- Act on the responses to the public consultation, outlined in section 6 and Appendix B of this report

3.4 Option 2 is to proceed with either one or a combination of two of the proposals set out in section 2 of this report. Officers do not consider this to be an appropriate action, due to the reasons for each scheme set out in section 2 and the results of the public consultation set out in section 6 and Appendix B.

3.5 Option 3 is to 'do nothing'. Officers do not consider this to be an appropriate option as this is likely to result in:

- Continued road danger as a result of high motor traffic levels, speeds, collisions and harmful emissions – with a variety of those issues prevalent both during lockdowns and as lockdowns' restrictions begin to ease
- Inability of residents and other users of Camden's streets – especially vulnerable roads users (pedestrians, cyclists, those pushing buggies, using wheelchairs and so on) to safely comply with Government guidance on 'social distancing', which is likely to be in place for some time and
- Impeded access into, through Inverness Street and Gloucester Crescent for Emergency Services. Enabling unimpeded access for emergency services is really important as residents and other local stakeholders have highlighted antisocial behaviour and crime issues in the area

Doing nothing is also considered not to be an appropriate option in light of the comments being received from residents local to the area as part of the ETO consultation for the Arlington Road Area LTN and the results of the public consultation on the proposed amendments to Arlington Road Area LTN. See section 6 of this report for further details.

4. WHAT THE KEY IMPACTS AND RISKS OF THE INTENDED OPTIONS ARE AND HOW THEY WILL BE ADDRESSED

4.1 Risks and mitigations

The key risks arising from the proposed amendments and the associated mitigations are outlined in table 3. Through the public consultation, concerns were voiced that several aspects of the proposed amendments may result in negative impacts. A comprehensive analysis of and response to concerns raised in the public consultation is provided in Appendix B.

Table 2 Risks and Mitigations

Risk	Mitigation
<p>Motor vehicles attempting to access Arlington Road from Inverness Street perform a U turn movement in front of Cavendish school entrance and compromise pedestrian safety</p>	<p>Large signage will be installed in advance of the restriction, in numerous locations, outlining that there is no available through route (through the Gloucester Crescent/Inverness Street) to Arlington Road.</p> <p>Whilst the signage that will be installed in advance of the restriction will limit the number of drivers attempting to make this movement, space has been made available, by relocating parking spaces, on the eastern end of Inverness Street to facilitate U turns taking place in a location that is not immediately outside the entrance of Cavendish School.</p> <p>Traffic volumes on Gloucester Crescent and Inverness Street will be monitored closely during the trial and if considered necessary, Officers will work with the Cavendish School on a Healthy School Street proposal that would create a further "timed" restriction to motor vehicles on Inverness Street at school opening/closing times.</p>
<p>Planters introduced on Inverness Street attract Anti- Social Behaviour (ASB)</p>	<p>Low planters (70cm) and low growing plants are specified. Moreover, a mesh top section at soil level would be used for the planters, which would make item concealment difficult. The MET Police has been contacted during the design process and had no comments on this element of the proposal.</p>
<p>Emergency services access restricted by the modal filters</p>	<p>Statutory consultees (including police, ambulance and the fire services and the Road Haulage Association and the Road Freight Association) have been contacted and comments received have been considered as part of the design process.</p> <p>A camera based modal filter has been included on Inverness Street rather than a bollard arrangement to ensure that emergency services have a direct access through Inverness Street to Arlington Road. Under blue light regulations, Emergency Services can use restricted streets which are signed as 'No Motor Vehicle Access'. Access for emergency services and local residents around the restriction at Mornington</p>

	<p>Place junction with Clarkson Row/Mornington Terrace would be enabled on the surrounding local street network. The Fire Brigade carry keys to allow them to go through removable bollards.</p> <p>All Statutory Consultees will have the opportunity to make further comments as part of the Experimental Traffic Order process.</p>
Issues with designs of schemes become apparent after installation	Road Safety Audits (RSA) Stage 1 & 2 have been completed as part of the design process and necessary safety changes have been made to the designs as part of this process. RSA Stage 3 will be completed post installation of each scheme.
Using cameras to enforce restrictions comes with data collection and handling risks	A Data Protection Impact Assessment has been produced for the Boroughs wider Safe and Healthy Streets programme and will be used for the Inverness Street scheme.
The proposed motor vehicle traffic restrictions at Inverness Street and Mornington Place will cause traffic displacement to surrounding streets, resulting in increased congestion, pollution and road safety risk	It is proposed that the schemes will be implemented under an Experimental Traffic Order. The impacts of the schemes will be monitored during the trial period. Traffic levels and air quality will be monitored across the area, on relevant streets, as required, after the schemes are implemented. Following the completion of the trial period, the council will carry out a full public consultation and Officers will consider making additional changes if deemed necessary.

4.2 In terms of equality considerations, an Equality Impact Assessment (EQIA) has been produced, including the results of the public consultation regarding protected characteristics, and is included in Appendix G. The measures are considered to advance equalities for many protected groups and to promote equality of opportunity among protected groups, in line with the Camden Transport Strategy.

5. LINKS TO CAMDEN PLAN

5.1 Investing in introducing cycling and road safety improvements in the Arlington Road Area LTN contributes towards meeting Our Camden Plan's objectives to create clean, vibrant and sustainable places and to enable healthy, independent lives. There are significant environmental, health, economic and social benefits that come from investing in more sustainable methods of travel. Providing safe facilities that enable more residents and visitors to use these modes is a means of ensuring that Camden residents access these benefits and, ultimately,

enables more sustainable neighbourhoods in Camden and makes it easier for residents to make healthier choices, such as increased physical activity from walking and cycling. People walking and cycling are more likely to stop and spend money in shops, meaning the proposals contribute to increasing inclusive economic growth in the area.

6. CONSULTATION/ENGAGEMENT

- 6.1 Following the implementation of the Arlington Road Area LTN the Council has received 144 emails (to date) to the 'Safe Travel' email inbox in relation to the scheme from local residents and stakeholders. Of these emails, 33 voiced concerns about congestion issues on Gloucester Crescent and Inverness Street.
- 6.2 In response to the concerns raised about ongoing traffic volume issues on Gloucester Crescent and Inverness St, the Council held a meeting with representatives of local residents of Gloucester Crescent to discuss the ongoing issues. During the meeting the residents expressed their concerns and outlined their proposed solution, while Officers presented their proposals to resolve the issues and the different options were discussed. The initial proposal that was outlined to residents at this location was a full restriction on motor vehicles (in both directions at the junction of Inverness Street and Arlington Road), however residents highlighted that they were uncomfortable with these proposals due to their fear of antisocial behaviour problems in the area. The residents further assessed the proposals of the Council and expressed their preference for the proposal that restricts access to Arlington Rd from Inverness Street only. The Council confirmed via email that they would proceed with the residents' preferred option, and public consultation was brought forward.
- 6.3 Pre-scheme engagement with emergency services was undertaken, and comments made have been considered as part of the design process.
- 6.4 Meetings with Councillors from the Wards of Regents Park and Camden Town with Primrose Hill were held in November 2020 to discuss the proposed amendments to the Arlington Road Area LTN. The Councillors made comments on elements of the scheme and their comments and suggestions have been incorporated where possible into the proposals set out above.
- 6.5 Between 14 December and 21 December 2020, a public consultation was carried out on the proposed amendments to Arlington Road Area LTN. A total of 3599 consultation postcards (see appendix A) informing stakeholders of the consultation, were posted to all properties (including residents, businesses and organisations) within the Arlington Road Area LTN (see Figure 2 above), as well as Local and Statutory Groups, Emergency Services and Ward Members in relevant wards.
- 6.6 The consultation was available online at WeAreCamden.org where respondents could submit their views via an online questionnaire. Only one response per respondent/ organisation was accepted. The consultation web page included detailed descriptions, as well as drawings of the proposed amendments. This consultation page can be viewed on We Are Camden: <https://consultations.wearecamden.org/supporting-communities/arlington-road-scheme-amendments/>.

- 6.7 Overall, 238 responses to the consultation were received online and via email. A detailed overview of the consultation is provided in Appendix B.
- 6.8 A summary of the consultation responses is provided below:

Inverness Street

Overall, a greater proportion of respondents to the consultation (49.6%) either disagreed or strongly disagreed with the proposals for Inverness Street compared to those who agreed or strongly agreed. However, further analysis of the responses shows that 50.5% of Camden residents from within the consultation area either agreed or strongly agreed with the proposals, against 39% who either disagreed or strongly disagreed. In addition, a slight majority of Camden residents from outside the consultation area also either agreed or strongly agreed with the proposals. A majority of those from outside of Camden disagreed or strongly disagreed with the proposals for Inverness Street.

Table 3 Summary of responses for Inverness Street proposal by respondent location

Inverness Street proposal					
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
LB Camden Residents/ Organisations/ Businesses within consultation area*	38.10%	12.40%	10.50%	13.30%	25.70%
	50.50%			39.00%	
LB Camden Residents/ Organisations/ Businesses outside the consultation area**	43.08%	7.69%	1.50%	3.08%	44.62%
	50.70%			47.70%	
Respondents from outside Camden	27.30%	4.50%	0.00%	6.10%	62.10%
	31.80%			68.20%	
Overall response	36.40%	8.90%	5.10%	8.50%	41.10%
	45.30%			49.60%	

* Refers to all the respondents who provided a postcode that was within the consultation area outlined in section 1.2.

** Refers to all the respondents who provided a postcode within Camden but outside the consultation area.

Mornington Place

Overall a greater proportion of respondents to the consultation (47.5%) either disagreed or strongly disagreed with the proposals for Mornington Place. However further analysis of the responses shows that responses from Camden residents both within the consultation area and outside the consultation area were more balanced between those who either agreed or strongly agreed or those who disagree or strongly disagreed. Much like the Inverness Street proposals, a majority of those from outside of Camden disagreed or strongly disagreed with the proposals for Mornington Place.

Table 4 Summary of responses for Mornington Place proposal by respondent location

Mornington Street proposal					
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
LB Camden Residents/ Organisations/ Businesses within consultation area*	17.10%	15.20%	33.30%	5.70%	28.60%
	32.30%			34.30%	
LB Camden Residents/ Organisations/ Businesses outside the consultation area**	29.23%	20.00%	3.10%	1.54%	46.15%
	49.20%			47.70%	
Respondents from outside Camden	18.20%	10.60%	3.00%	4.50%	63.60%
	28.80%			68.10%	
Overall response	20.80%	15.30%	16.50%	4.20%	43.20%
	36.10%			47.50%	

Parking Amendments

Overall, 33% of the respondents to the consultation either agreed or strongly agreed with the proposals for parking amendments. A significantly greater proportion of Camden residents from within the consultation area either strongly agreed or agreed with the proposed parking amendments (40%), compared to those who disagreed or strongly disagreed (13.6%). Camden residents outside the consultation area responded roughly equally across the following categories: Strongly agree and agree, Neutral and disagree and strongly disagree.

Table 5 Summary of responses for the proposed parking amendments by respondent location

Parking amendments***					
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
LB Camden Residents/ Organisations/ Businesses within consultation area*	25.70%	14.30%	46.30%	1.90%	11.70%
	40.00%			13.60%	
LB Camden Residents/ Organisations/ Businesses outside the consultation area**	20.00%	13.90%	36.90%	1.54%	27.70%
	33.90%			29.20%	
Respondents from outside Camden	10.60%	10.60%	39.40%	6.60%	32.80%
	21.20%			39.40%	
Overall response	19.90%	13.10%	41.90%	3.10%	22.00%
	33.00%			25.10%	

*** Parking amendments results refer to the results averaged for the three locations (Arlington Road, Albert Street and Mornington Street). The responses received for each of the three locations were very similar, therefore it was considered appropriate to average the results.

- 6.9 Further analysis of the responses received is provided in Section 2 of Appendix B. Please also see Appendix B for a more detailed analysis of the consultation feedback, including Officers' responses.
- 6.10 Should a decision be made to proceed with the proposals set out in section 2, the following engagement activities will be undertaken prior to implementation of each change:
- A notification letter informing local residents, businesses etc. of the changes, the reasons for each, and opportunities to provide feedback will be sent to all properties in the area shown in **Figure 2**.
 - The same letter will be sent to local stakeholders identified through the CINDEX database for the relevant area, including Ward Members and the Cabinet Member.
 - On-street notices will be displayed in the vicinity of each change, and the Council's Twitter feed will be used to notify all stakeholders of the initiatives.
 - The dedicated webpage that has been developed within the Council's [Making Travel Safer in Camden](#) Covid-19 pages, will be updated to provide details of the changes, opportunities for feedback, and so on.
- 6.11 In addition, with reference to disability, the Council has a duty under section 29 of the Equality Act (set out in the EQIA, Appendix G) not to do anything that constitutes discrimination (or victimisation or harassment) in the exercise of a public function, and a duty to make reasonable adjustments. The EQIA is also important material in this regard.

7. LEGAL IMPLICATIONS

- 7.1 The recommendations in this report are being considered in the Council's capacity as the Local Traffic Authority for the Borough.
- 7.2 Parts I and II of the Road Traffic Regulation Act 1984 ("RTRA") empower the Council to regulate or restrict traffic on roads within the Borough by Traffic Regulation Order for a range of purposes.
- 7.3 RTRA section 9 (experimental orders) and RTRA section 14 (temporary orders) are the main powers potentially available to the Council for its Covid-19 road traffic measures. An ETO under RTRA section 9 can authorise traffic filtering and footway widening; a temporary order or notice under RTRA section 14 can authorise traffic filtering, footway widening and restricting vehicle speeds.
- 7.4 An ETO is appropriate for a measure introduced on an experimental basis with a view, if the experiment is successful, to continuing it after the experimental period has ended. Thus, an amending ETO is recommended as the appropriate order for the subject scheme. The scheme will follow the revised ETO consultation process outlined in paragraphs 6.6 to 6.11 of SC/2020/74 and approved by the Cabinet Member for a Sustainable Camden on 13th May 2020.

Statutory duties and powers relating to road safety

- 7.5 Under RTRA section 122(1), the Council has a duty, so far as practicable having regard to the matters set out in section 122(2), to exercise its functions under the RTRA to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. Based on case law applicable to another RTRA power, it is considered that “safe” in section 122(1) means “not at risk of accident”, rather than “free from ill-health”.
- 7.6 Section 39 of the Road Traffic Act 1988 requires the Council to prepare and carry out a programme of measures designed to promote road safety, to carry out studies into accidents arising out of the use of vehicles on roads in its area, and – in the light of those studies - to take such measures as appear to the Council to be appropriate to prevent such accidents, including giving advice and practical training to road users, the construction, improvement, maintenance or repair of roads for which they are responsible, and other measures taken in the exercise of its powers for controlling, protecting or assisting the movement of traffic on roads.

The network management duty and Covid-19 statutory guidance in the road traffic field

- 7.7 The Department for Transport (DfT) guidance mentioned at paragraphs 1.3 and 1.4 of this report was/is issued under section 18 of the Transport Management Act 2004 (TMA). As the DfT notes in the guidance, “it applies to all highway authorities in England, who shall have regard to this guidance to deliver their network duty under the act. It is effective from the date of publication” – which was 23rd May 2020.
- 7.8 TMA section 16 (the network management duty) provides as follows:
- “(1) It is the duty of a local traffic authority... (“the network management authority”) to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives–*
- (a) securing the expeditious movement of traffic on the authority's road network; and*
 - (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.*
- (2) The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing–*
- (a) the more efficient use of their road network; or*
 - (b) the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority; and may involve the exercise of any power to regulate or co-ordinate the uses made of any road (or part of a road) in the road network (whether or not the power was conferred on them in their capacity as a traffic authority).”*

Equality

7.9 The Council must, when carrying out the Council's functions (which includes making decisions), have due regard to the needs set out in section 149 of the Equality Act 2010 (the Public Sector Equality Duty ('PSED')). This duty includes having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic (including people with a disability) and persons who do not share it. The Council must consider the duty, which is personal to decision makers. In order to assist the Council to comply with section 149, an Equality Impact Assessment (EQIA) has been prepared and is attached as Appendix G. The relevant decision-maker must carefully consider the EQIA as applicable to the scheme they are asked to approve.

In addition, with reference to disability, the Council has a duty under section 29 of the Equality Act (set out in the EIA) not to do anything that constitutes discrimination (or victimisation or harassment) in the exercise of a public function, and a duty to make reasonable adjustments. The EQIA is also important material in this regard.

7.10 The Council should also bear in mind relevant parts of the United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child (these are referred to in more detail in the EIA). Some of those parts relate to (as regards persons with disabilities) the physical environment, transportation, personal mobility and sporting and leisure activities (UNCRPD), and (as regards children) self-reliance and active participation in the community of disabled children, standards of health, dangers and risks of environmental pollution, and recreational and leisure activities (UNCRC).

7.11 In summary, the PSED requires the Council, when exercising its functions, to have 'due regard' to the need to:

1. Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (which includes conduct prohibited under section 29);
2. Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
3. 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).

7.12 Under the duty the relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion, sex, and sexual orientation. In respect of the first aim only i.e. reducing discrimination, etc the protected characteristic of marriage and civil partnership is also relevant.

7.13 Having due regard to the need to 'advance equality of opportunity' between those who share a protected characteristic and those who do not includes having due regard, in particular, to: the need to remove or minimize disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; the need to take steps to meet the needs of persons who

share a protected characteristic where those needs are different from the needs of persons who do not share that characteristic, and encourage those who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

- 7.14 Further, section 149 provides that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities. Compliance with the PSED may involve treating some persons more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited under the Act (which includes breach of an equality clause or rule, or of a non-discrimination rule).
- 7.15 The Council should be aware that the PSED is not a duty to achieve the objectives or take the steps set out in section 149. Rather, the PSED requires the authority to take the specified needs into proper consideration when carrying out its public functions. There must be a proper appreciation of the potential impact of the decision on the equality objectives set out in section 149 and of the desirability of promoting them. "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. Provided due regard is had in this way, including considering mitigation measures as described below, it is for the Council to decide, taking into account all relevant factors (which may, depending on the circumstances, include the requirement upon the Council to operate within its budget) how much weight to give to the equality implications of the decision.
- 7.16 Paragraph 4.2 of this report provides a summary of equality considerations in relation to the proposals. However, a careful consideration of the EQIA itself is one of the key ways in which the relevant decision makers can show that they have carried out their duty to "have regard" to the relevant matters. The relevant decision-makers must therefore carefully consider the EQIA in respect of the scheme(s) they are being asked to approve. In considering the EQIA and all other material contained in and appended to this Report, the relevant decision-makers must bear in mind all of the parts of the public sector equality duty set out in the previous paragraph, and the duty not to discriminate and to make reasonable adjustments set out in section 29. Further, the relevant decision-makers should bear in mind the Convention provisions.
- 7.17 Where it is apparent from the analysis of the information that any of the proposed recommendations, should they be agreed, would have an adverse impact on those with protected characteristics, then any adjustments that would avoid or reduce that effect (mitigating steps) should be identified and careful consideration then given to whether and if so how they can be implemented.
- 7.18 In exercising its road traffic and highway powers, the Council is exercising a "public function": Under section 29 of the Equality Act 2010, it must not, when exercising a public function, "do anything that constitutes discrimination, harassment or victimisation" (section 29(6)) and it must make reasonable adjustments (section 29(7)). The duty to make reasonable adjustments arises in relation to disabled persons and under section 20 of, and Schedule 2 to, the Equality Act 2010.

7.19 In exercising its road traffic and highway powers, the Council is exercising a “public function”: Under section 29 of the Equality Act 2010, it must not, when exercising a public function, “do anything that constitutes discrimination, harassment or victimisation” (section 29(6)) and it must make reasonable adjustments (section 29(7)). The duty to make reasonable adjustments arises in relation to disabled persons and under section 20 of, and Schedule 2 to, the Equality Act 2010.

8. ENVIRONMENTAL IMPLICATIONS

8.1 The proposals within this report have positive implications for the environment. They are designed to reduce traffic movements and support sustainable modes of transport such as walking and cycling, which will limit air pollution and reduce greenhouse gas emissions. The proposals align with the objectives of the Clean Air Action Plan, the Climate Action Plan and recommendation 9 of Camden’s Citizen Assembly on the Climate Crisis, to trial more car free days and zones. The proposals strongly align with the action in the Climate Action Plan to “Lead the delivery of transformational low emission transport projects in Holborn, Camden Town, Kentish Town and Frognal by 2023.

9. RESOURCE IMPLICATIONS

9.1 The estimated total cost for the proposed measures is £80,000 which will be funded from the Mayors Air Quality Fund (as part of the Camden Town Low Emission Neighbourhood project).

9.2 It should be noted that whilst funding has been identified for the installation costs above, after the 12-month warranty period there will be on-going maintenance costs creating a budget pressure that will require Council resource. In addition, there may be on-going hosting and data costs. The cost for the camera is estimated at £3.5k per annum (post the 12-month warranty period) subject to data volume etc. For the six-month period after the 12-month warranty the cost will be £3.5k per annum per camera. This should be reviewed post implementation and in conjunction with other schemes that include Unattended CCTV cameras.

9.3 There would be a loss of parking revenue from the removal of Paid for Parking spaces and reduction in the number of spaces available, which will be monitored during the ETO period.

9.4 Additionally, it is recognised that the use of ANPR cameras may result in income arising from issuing of Penalty Charge Notices to motor vehicles who contravene the restriction. However, the sole purpose of using ANPR cameras is to enforce the traffic restriction measure, with any income arising being an unintentional outcome. A camera has been used at this location to ensure that emergency services are provided with direct access through Inverness Street and Gloucester Crescent to Arlington Road.

10. NEXT STEPS

- 10.1 The next step for the proposed measures, if a decision is taken to proceed with them, will be to proceed with the amending ETO on the 21st of January 2021. The ETO amendments would come into force on the 28th of January 2021 and construction of the proposed schemes would follow.
- 10.2 These proposals, subject to a decision being made, will be implemented via an amendment to the existing Arlington Road Area LTN Experimental Traffic Order, which is being implemented under Section 9 of the Road Traffic Regulation Act 1984 using an Experimental Traffic Order (ETO).
- 10.3 The ETO, which these proposals seek to amend, will be in place for 18 months, of which nearly four months have now passed since the ETO came into force on 24th September 2020. The Council will carry out a full public consultation after the experimental scheme has run for 12 months, post 24th September 2020. This consultation will then inform the Council's decision as to whether, at the end of the 18-month experiment, the experimental scheme should be made permanent (and, if so, whether with or without changes) or allowed to lapse. As outlined in the Arlington Road Area LTN decision report, traffic and air quality will be monitored across the area, as required, on relevant streets.

11. APPENDICES

Appendix A – Consultation postcard and street notice

Appendix B - Consultation Responses and Officers' Comments

Appendix C – Inverness Street (Not to Scale)

Appendix D – Mornington Place (Not to Scale)

Appendix E – Parking Changes (Not to Scale)

Appendix F – Arlington Road Area Traffic Counts (weekday average total)

Appendix G – Equality Impact Assessment

Appendix H – Consultation Questionnaire

REPORT ENDS