

NON-KEY EXECUTIVE OFFICER REPORT

LONDON BOROUGH OF CAMDEN	WARDS: Belsize, Bloomsbury Camden Town, Kentish Town South
REPORT TITLE Safe and Healthy Streets: Cycle Permeability Programme Phase 4 Proposals	
REPORT OF Head of Transport Strategy and Projects, Supporting Communities	
FOR SUBMISSION TO Director of Environment and Sustainability, Supporting Communities	DATE 25 th June 2024
STRATEGIC CONTEXT <p>We Make Camden is our joint vision for the borough, developed in partnership with our community. The proposals in this report meet key objectives of We Make Camden by helping to create clean, vibrant, and sustainable places and making it easier for people to travel by active modes of transport, and everyone empowered to contribute to tackling the climate emergency.</p> <p>The Way We Work is the Council's response to We Make Camden. These proposals would contribute to ensuring Camden's communities support good health, wellbeing, and connection for everyone so that they can start well, live well, and age well.</p> <p>The Cycle Permeability Programme Phase 4 Proposals contribute to key objectives in the Camden Transport Strategy, Clean Air Action Plan, Climate Action Plan, and the Mayor's Transport Strategy.</p>	
SUMMARY OF REPORT <p>This report seeks approval from the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, to implement Phase 4 of the Cycle Permeability Programme at seven locations in the borough, as set out in Section 2 of this report, and for which a decision is sought. The locations are: 1. Alfred Place, 2. Belsize Terrace, 3. Hadley Street & Castle Road, 4. Handel Street, Kenton Street and Hunter Street, 5. Herbrand Street, 6. Maresfield Gardens, and 7. Streatham Street.</p> <p>The proposals aim to transform the public realm, make the roads safer, improve accessibility for cyclists, help to make walking safer, easier, and more enjoyable, while improving the local environment and air quality by introducing low level planting and planting trees.</p> <p>Public consultations on the 7 scheme proposals detailed in this report were undertaken from 19th February 2024 to 9th March 2024.</p> <p>The report follows a consideration of relevant policies and the public consultation on the proposals. The proposals meet the objectives of We Make Camden by helping create clean, vibrant, and sustainable places and making it easier for people to travel by active modes of transport, which would help to encourage residents to cycle more instead of driving motor vehicles. This would in turn contribute to improving air quality and lowering carbon emissions in the borough. The proposals also meet the objectives of We Make Camden by improving biodiversity, reducing the impacts of flooding, and responding to the impacts of climate change.</p>	
Local Government Act 1972 – Access to Information	

No documents that require listing were used in the preparation of this report.

Contact Officers: Andrew Mortimer, Transport Planner, Transport Strategy and Projects Service, 5 Pancras Square, London N1C 4AG, andrew.mortimer@camden.gov.uk

RECOMMENDATIONS

THAT the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, and having considered the proposals in relation to the objectives set out in the [Camden Transport Strategy](#), the public consultation results (Section 6 and **Appendix B**), the Equality Impact Assessment (EqIA) (Section 4 and **Appendix A**), the Strategic Policy Alignments (**Appendix C**), having due regard to the needs set out in section 149 of the Equality Act 2010, and subject to compliance with relevant statutory requirements and detailed design:

- (i) approves the implementation of the proposed Cycle Permeability changes at the 7 scheme locations, as summarised in section 2 of this report; and
- (ii) delegates to the Chief Engineer the authority to take any further decisions required for the implementation of the recommended proposals.

Signed:



Sam Margolis, Head of Transport Strategy & Projects

Date: 22nd May 2024

1. PURPOSE OF THE REPORT

- 1.1 This report seeks approval from the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, for implementing proposed changes at 7 scheme locations, as outlined in Section 2 of this report. The Director of Environment and Sustainability is considered the appropriate decision maker due to the medium size/complexity and cost (£50,000 - £250,000) of the proposals in accordance with a paper titled [Healthy Streets Transport schemes: Consultation and decision-making processes \(SC/2021/07\)](#) which was approved by Cabinet on 10th November 2021.
- 1.2 Enabling walking and cycling is a key strategic outcome for the Council as set out in multiple strategy documents. The [Camden Transport Strategy](#) (CTS), adopted in 2019, has 7 objectives, all of which are directly aligned with the proposals for this scheme. Objective 1, for example, seeks to “transform our streets and places to enable an increase in walking and cycling”. The Council’s Climate Action Plan, responding to the Citizens Assembly on the climate emergency, supports interventions including motor vehicle restrictions and additional greening on our streets. The proposals in this report respond to these strategy documents, as well as the Camden Clean Air Action Plan, and support the wider ambitions for sustainable streets and travel in Camden set out in We Make Camden. The proposed scheme also aligns with the CTS 3-year delivery plan for 2022/2023 to 2024/2025, [here](#).
- 1.3 The proposals in Section 2 of this report help to meet the Mayor of London’s Healthy Streets objective (and, accordingly, the Mayor’s Transport Strategy) of improving local environments by providing more space for walking and cycling, and better public spaces where people can interact.
- 1.4 The overarching aim of the Cycle Permeability programme is to help overcome barriers to cycling, in alignment with Camden Transport Strategy (CTS) and supporting Cycling Action Plan. Many streets in the borough are one-way and links between streets on desired routes and Camden’s existing cycle network is severed by infrastructure, traffic restrictions or highly trafficked major roads. The Cycle Permeability programme aims to make Camden’s streets more accessible to cyclists and provide better connections and links through measures such as cycle contra-flow routes on one-way streets and cut throughs at road closures. Several such permeability improvements for cyclists have been made in recent years.
- 1.5 In addition to the Cycle Permeability scheme proposals, the report also seeks approval to permanently install two bike hangars on Castle Road, two bike hangars on Hadley Street, and two bike hangars on Maresfield Gardens. This is in line with the commitment in the [Cycling Action Plan](#) for the roll out of a cycle hangars programme on street and in estates.
- 1.6 The Council has installed 318 bike hangars to date across Camden, with 68 of these having been installed during the past 12 months. However, there is growing demand from residents living in high density dwellings that are common in the Borough and usually have limited space for covered and secure

cycle parking. Waiting list data provided by Cyclehoop and Falco (the Council's previous cycle hangar supplier) indicates that the majority of the 318 hangars installed in the Borough, so far, are fully occupied with a combined waiting list of circa 9,000 people. The hangars provide secure on-street bike parking for residents. The installation of a bike hangar in an area usually increases the number of requests in that locality, such is the demand for secure bike hangar parking. The implementation of bike hangars contributes to a key mission in We Make Camden that by 2030, Camden's estates and neighbourhoods are healthy, sustainable and unlock creativity.

- 1.7 A key objective of the Camden Transport Strategy (CTS) is to improve cycling facilities for those living, visiting, and working in the borough. The [Cycling Action Plan](#), which forms part of the CTS, sets a target to deliver at least 50 secure bike parking spaces per annum. The [Clean Air Action Plan 2023-2026](#) states that the Council will continue to work towards a modal shift away from motor vehicles by implementing, amongst other measures, infrastructure such as bike hangars. The provision of bike hangars for residents contributes towards achieving these objectives and targets, and it is for this reason it has been proposed to install hangars within two of the proposed Cycle Permeability scheme areas.
- 1.8 We want to support the 17 recommendations from Camden's Citizens Assembly on the climate crisis. Bike hangars also help to deliver our own Transport Strategy priorities, which were strongly supported when we consulted on them, including increasing cycling, improving air quality, and making our streets and transport networks safe, accessible, and inclusive for all.
- 1.9 The schemes help meet the Mayor of London's Healthy Streets objective of enabling more people to walk and cycle more often. In addition, they meet several of Camden's Transport Strategy (CTS) objectives including Objective 1: "to transform our streets and places to enable an increase in walking and cycling", and Objective 2 "to reduce car ownership and use, and motor traffic levels in Camden".
- 1.10 The [Camden Transport Strategy](#) (CTS) and accompanying [Walking and Accessibility Action Plan](#) aim to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal. Our priorities include:
 - increasing walking and cycling
 - improving public transport in the borough
 - reducing car ownership and use
 - improving the quality of our air
 - making our streets and transport networks safe, accessible, and inclusive for all
- 1.11 CTS Policy 1a states that "the Council will use a road user hierarchy to inform all relevant decisions: walking, cycling and public transport will be prioritised above private vehicle use as follows:
 - Pedestrians

- Cyclists
 - Public transport/vehicles for people with a disability
 - Freight (including loading and unloading)
 - Taxis
 - Powered two-wheelers (motorcycles) and private cars
- 1.12 Policy 1c of the CTS states that “the Council will change how road space is allocated, including reducing kerbside space for parking/loading provision, and reallocating carriageway space to active, sustainable travel modes, if necessary, to enable and encourage people to walk and cycle, to improve road safety and deliver enhancements to the public realm”. Camden’s [Cycling Action Plan](#) sets out our commitment to “converting all feasible one-way roads to two-way for cycling”, which would also be supported by these proposals.
- 1.13 The proposals for low level planting and/or tree planting at some of the 7 scheme locations (subject to ground condition surveys) would help to encourage and enable healthy and sustainable travel choices and promote biodiversity in line with our [Climate Action Plan](#).
- 1.14 The Department for Transport (DfT) issued its strategy for cycling and walking, [Gear Change](#), on 27 July 2020, outlining plans to upgrade active travel. The DfT highlights that there needs to be a step change in cycling and walking in the coming years, and the potential benefits of increasing cycling and walking can help tackle some of the most challenging issues such as: improving air quality, combating climate change, improving health and wellbeing, addressing inequalities, and tackling congestion on roads.
- 1.15 In December 2022 Cabinet (see item 15 of [this link](#)) approved the new CTS Delivery Plan for 2022/23 to 2024/25. This Plan reinforced the Council’s commitment, subject to scheme by scheme consultation and approvals processes, to rolling out a range of Safe & Healthy Streets schemes, including “multi-year programmes which include cycle permeability”.
- 1.16 The proposals in this report respond to the above-mentioned strategy documents. The proposals aim to transform the public realm, make the roads safer, improve accessibility for cyclists in the area, help to make walking and cycling safer, easier, and more enjoyable, while improving the local environment and air quality by creating a rain garden with plants and trees. This report also provides details of the proposals (Section 2), a summary of officers’ responses to feedback from the public consultation (Section 6) and an analysis on the impacts these proposals might have on those with protected characteristics as defined in the Equality Act 2010 (Section 4).
- 1.17 A Strategic Policy and Alignments document relating to the proposal is provided in **Appendix C**.

2. PROPOSAL AND REASONS

- 2.1 The Cycle Permeability Phase 4 proposals have been developed to improve connections and links, making streets safer and more accessible to cyclists.

This report provides details of the proposals, a summary of officers' responses to feedback from the public consultations and an analysis on the impacts of these proposals might have on the nine protected groups as defined in the Equality Act 2010.

- 2.2 61% of the 381 Camden residents responding to the Camden Transport Strategy (CTS) consultation stated that they agreed with the principle of reallocating road and kerb-side space away from motor vehicles in favour of more sustainable modes.
- 2.3 The proposals are based on the policy context set out above, as well as data collected, and feedback received from the public consultations. Details of the proposals for the 7 schemes are provided below.

1. Alfred Place scheme proposals – Bloomsbury ward

- 2.4 Alfred Place is a one-way street northwest bound between Store Street and Chenies Street. The scheme proposals would make it easier to travel by bike locally, so that people can cycle in both directions on Alfred Place. This is in line with Camden's ambition to improve cycling access and priority.
- 2.5 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to:
- Introduce two-way cycling (where traffic only flows one-way) on Alfred Place between Chenies Street and Store Street with associated signage to improve cycling accessibility in the area.
 - An example of signing for two-way cycling on a one-way street can be found in the photo guide provided as **Appendix E**.

2. Belsize Terrace scheme proposals – Belsize ward

- 2.6 Belsize Terrace is closed to motor vehicle traffic at the junction with Belsize Lane and has an existing cycle track that allows people cycling to travel from Belsize Lane to Belsize Terrace. The scheme proposals would make it easier to travel by bike locally and improve the road and pavement surfaces. This is in line with Camden's ambition to improve cycling access and priority.
- 2.7 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to:
- Replace or relay the existing surface on the cycle track between Belsize Lane and Belsize Terrace to create a more cycle friendly surface.
 - Replace the existing cycle parking stands with new cycle parking stands on Belsize Terrace near the junction with Belsize Lane to improve cycle parking facilities.
 - Relocate the existing planter next to the zebra crossing on Belsize Lane to make it easier for pedestrians to move through the public space at the north end of Belsize Terrace.

- Examples of cycle track surfacing and cycle parking stands can be found in the photo guide provided as **Appendix E**.

2.8 If approved, various elements of the proposed scheme will be reviewed at detailed design stage to address concerns raised by respondents. This includes the method and type of material for repaving the existing cycle track, the location and layout for the replacement cycle parking stands, and the specific positioning of a planter adjacent to the zebra crossing on Belsize Lane.

3. Hadley Street scheme proposals – Camden Town and Kentish Town South wards

2.9 Hadley Street runs from Prince of Wales Road in the North to Lewis Street in the South with a motor vehicle restriction via a series of bollards and a fire gate at the northern arm of the junction where Hadley Street meets Castle Road.

2.10 The scheme proposals would make it easier to travel by bike locally, so people who cycle can access the wider cycle network. We have also heard from some disabled people that the ramp on the existing cut through is steep and adjusting the ramp would make it easier and safer for those who use tricycles and other adapted bicycles. We also want to increase the amount of plants and trees in the area. This is in line with Camden's ambition to improve cycling access and priority and also to improve pedestrian accessibility in the area.

2.11 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to:

- Widening the pavement, planting two new trees, and adding cycle stands at the location of the existing motor vehicle restriction on Hadley Street to improve cycle accessibility.
- Removing the existing fire gate and replacing it with removable bollards to improve cycle accessibility.
- Widening the pavement on Castle Road outside the Tapping The Admiral Pub and planting a new tree to improve the look and feel of the area.
- Installing two cycle hangers on Castle Road (opposite the Tapping The Admiral Pub) by removing 5.6 meters of Pay by Phone Parking to improve resident access to secure cycle storage.
- Installing two cycle hangers on Hadley Street (opposite no.34) by removing 5.2 meters of resident parking to improve resident access to secure cycle storage.
- Examples of pavement buildouts and tree planting, bike hangars, cycle parking, and access improvements can be found in the photo guide provided as **Appendix E**.

2.12 The proposals to provide two cycle hangers on Castle Road and two cycle hangers on Hadley Street would help to address demand from local residents for somewhere safe and secure to store bikes. Waiting list data indicates that 69 residents are on the waiting list for spaces in the nearest cycle hangars on Castlehaven Road (2 hangars) and Ryland Road (3 hangars).

- 2.13 If approved, various elements of the proposed scheme will be reviewed at detailed design stage to address concerns raised by respondents. This includes the inclusion of a raised junction table where Hadley Street meets Castle Road.

4. Handel Street, Kenton Street, and Hunter Street scheme proposals – Bloomsbury ward

- 2.14 Handel Street and Kenton Street are one-way streets connecting Hunter Street in the East to Tavistock Place in the North. They have single yellow lines on both sides of the street. Hunter Street is a two-way road running from Brunswick Square in the South to Tavistock Place in the North. Hunter Street has an advisory cycle lane on the Northbound side between Handel Street and Tavistock Place.
- 2.15 The scheme proposals would make it easier to travel by bike locally, so people who cycle can access the wider cycle network. This is in line with Camden's ambition to improve cycling access and priority. We would also like to improve pedestrian accessibility in the area.
- 2.16 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to:
- Introduce two-way cycling on Handel Street and Kenton Street to improve cycle accessibility in the area.
 - Introduce new signage, on street cycle symbols, and other road markings to show the permitted cycle route in each direction.
 - Introduce double yellow lines on both side of Handel Street and Kenton Streets as well removing one permit holder parking bay and moving a disabled parking bay. This would improve cycling safety and reduce conflict with oncoming motor vehicles.
 - Introduce cycle parking stands on the corner of Handel Street and Kenton Streets with associated pavement widening and dropped kerbs to improve cycle parking facilities in the area.
 - Introduce continuous pavements (which highlight pedestrian priority) on the entry and exit points to/from Handel Street and Kenton Street to improve pedestrian provision at the junctions with Hunter Street and Tavistock Place.
 - Introduce a kerb segregated cycle track on Hunter Street (Northbound) between Handel Street and Tavistock Place in order to improve cycling safety in a traffic heavy area.
 - Examples of signing for two-way cycling on a one-way street, continuous pavements, segregated cycle tracks, and cycle parking can be found in the photo guide provided as **Appendix E**.
- 2.17 If approved, various elements of the proposed scheme will be reviewed at detailed design stage to address concerns raised by respondents. This includes the design of continuous pavements at the junctions with Hunter Street and Tavistock Place, the design of the cycle lane on Hunter Street, and the design of the pavement buildout and the location of cycle parking stands at the

southern end of Kenton Street adjacent to the entrance to the Marchmont Community Garden.

5. Herbrand Street scheme proposals – Bloomsbury ward

- 2.18 Herbrand Street is a street that runs from Tavistock Place to Guilford Street. The northern section which is a two-way street has a traffic restriction (except cycles) at the junction with Coram Street and can only be accessed by motor vehicle from the junction with Tavistock Place. The scheme proposals would make it easier to travel by bike locally, so that people who cycle can access the wider cycle network. This is in line with Camden's ambition to improve cycling access and priority.
- 2.19 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to:
- Widen the existing cycle lane on Herbrand Street (which runs in the opposite direction to motor vehicle traffic) to the north of Coram Street by narrowing the traffic island to increase cycling accessibility and safety.
 - Plant 2 new trees on the traffic island to increase the amount of planting in the area.
 - Replace the 'no entry' sign on the existing flexi-bollard with a 'cycle sign'. Please note the two 'no entry' signs on the existing sign posts on the island and pavement would be retained.
 - Introduce cycle friendly drain covers at the junction with Coram Street to improve cycle safety.
 - Examples of access improvements and tree planting can be found in the photo guide provided as **Appendix E**.
- 2.20 If approved, various elements of the proposed scheme will be reviewed at detailed design stage to address concerns raised by respondents. This includes the provision of cycle logo markings on the road surface to improve the legibility of two-way cycling on the section of Herbrand Street between Coram Street and Tavistock Place.

6. Maresfield Gardens scheme proposals – Belsize ward

- 2.21 Maresfield Gardens is a two-way street to the west of Fitzjohn's Avenue and is exit only (onto Fitzjohn's Avenue) for motor vehicles. The width of the existing cycle lane which runs in the opposite direction to motor vehicle traffic is sub-standard for some types of cycle (e.g., cargo bikes). The scheme proposals would make it easier and safer to travel by bike locally, so people cycling can access the wider cycle network. This is in line with Camden's ambition to improve cycling access and priority.
- 2.22 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to:
- Widen the existing cycle lane which runs in the opposite direction to motor vehicle traffic to improve cycle accessibility and introduce low-

level planting on the existing traffic island to make it a more attractive feature.

- Introduce 2 cycle hangers on the southeast part of Maresfield Gardens to improve cycle storage facilities in the area.
- Remove 10.7m of existing pay by phone parking and extend existing single yellow line to improve cycle safety around the junction with Fitzjohn's Avenue.
- Introduce a cycle flexi bollard facing Fitzjohn's Avenue and replace the existing gully cover with a cycle friendly cover to improve the signage and accessibility into Maresfield Gardens.
- Examples of access improvements, bike hangars, and low level planting can be found in the photo guide provided as **Appendix E**.

2.23 The proposals to provide two cycle hangers on Maresfield Gardens would help to address demand from local residents for somewhere safe and secure to store bikes. Waiting list data indicates that 180 residents are on the waiting list for spaces in the nearest cycle hangars on Kings College Road (1 hangar) and Belsize Park Gardens (1 hangar).

7. Streatham Street scheme proposals – Bloomsbury ward

2.24 Streatham Street has an existing motor vehicle restriction with a fire gate at the junction with Willoughby Street. We would like to make it easier and safer to travel by bike locally, so that people who cycle can access the wider cycle network. This is in line with Camden's ambition to improve cycling access and priority.

2.25 A summary of the proposals that were consulted on, with drawings in **Appendix D**, are to

- Remove the existing fire gate on Streatham Street, at the junction with Willoughby Street, and replace it with new removable bollards to increase cycle accessibility.
- An example of an access improvement can be found in the photo guide provided as **Appendix E**.

2.26 The Bloomsbury Association suggested during the consultation period that the scope of the scheme should be expanded slightly to include the provision of low level planters on Streatham Street and on the pavement on the west side of Willoughby Street. This would help to improve the character and appearance of the area.

2.27 If approved, various elements of the proposed scheme will be reviewed at detailed design stage to address concerns raised by respondents. This includes the provision of planters discussed above and the expansion of the existing Dockless E-Scooter & Cycle Hire parking bay on Streatham Street.

3. OPTIONS

3.1 This report presents two options to the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden. These are:

- Option 1 is to approve the recommendations and progress with implementing the proposals as set out in Section 2 of this report.
- Option 2 is to not approve the proposed recommendations and leave the streets at each of the 7 scheme locations as they are (i.e., “do nothing”).

3.2 Option 1 is recommended to the decision maker. Proceeding with this option would assist Camden to:

- Meet its transport policy objectives by continuing to prioritise active and sustainable modes of travel;
- Respond to the overall positive consultation outcomes for each of the 7 schemes;
- Improve accessibility;
- Improve road safety;
- Deliver on recommendations made by the Citizen’s Assembly on the Climate Crisis and related [Climate Action Plan](#) and [Clean Air Strategy and Clean Air Action Plan](#); and
- Contribute towards meeting the objectives of We Make Camden which states ambitions that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency. It would also meet the objective of responding to the impacts of climate change by encouraging a shift to active and sustainable modes of travel.

3.3 Option 2 is not recommended as it would not deliver the additional improvements that further enhance pedestrian and cyclist safety, public space amenities, or accessibility. In addition, it would not sufficiently respond to the overall positive consultation outcome, or the policy context discussed in the sections above.

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

4.1 This section seeks to illustrate to the decision maker the potential positive benefits the proposed designs for the 7 schemes would have, potential issues identified with the proposals, and mitigations for these issues.

4.2 An independent Road Safety Audit (RSA) Stage 1/2 has been completed on the proposed designs. The auditors did not identify any significant problems with the designs and minor changes recommended in the report would be incorporated into the detailed design for each of the 7 schemes where relevant. If the proposals are approved, a further Stage 2 RSA may be carried out at detailed design stage. Any issues identified at this stage would be considered

and changes proposed to the design if required. A Stage 3 RSA would be carried out approximately 3-6 months after the scheme is implemented. Again, any issues identified at this stage would be considered and further changes developed if required.

4.3 The proposals have been developed with due regard to the potential positive and negative impacts of the proposals on groups, including residents, and other stakeholders with protected characteristics, as defined by the Equality Act 2010. Due regard is also given to the Council's commitment to reducing inequality, which is reflected in both [We Make Camden](#) and the outcomes of Camden's Equality Taskforce. The relevant groups with protected characteristics are as follows:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race/ethnicity;
- Religion/Belief;
- Sex/Gender; and
- Sexual Orientation.

4.4 An assessment of the impacts of the proposals on the nine groups protected by the Equality Act 2010 (an EqIA) was carried out and is included in **Appendix A**. The assessment has highlighted that there are many potential positive benefits for protected groups associated with the proposed cycling improvements for the 7 schemes. Where potential negative impacts on individuals within the protected groups have been highlighted, officers have explored these issues and provided comments.

4.5 The proposals for 3 of the schemes (1. Belsize Terrace, 2. Hadley Street and Castle Road, and 3. Handel Street, Kenton Street, and Hunter Street) would potentially have positive benefits for all of the groups with protected characteristics. This would include the proposed resurfacing of the cycle track at Belsize Terrace, pavement widening at Hadley Street and Castle Road, and the introduction of continuous pavements at Handel Street / Hunter Street and Kenton Street / Tavistock Place, making it safer and easier for vulnerable road users, including children and the elderly, people with pushchairs, and disabled people and/or visual impairments to:

- cross the cycle track on Belsize Terrace, and
- cross the road at junctions at Handel Street / Hunter Street and Kenton Street / Tavistock Place.

4.6 The provision of wider pavements and junction improvements at Hadley Street and Castle Road would bring benefits to pedestrians, particularly elderly people, pedestrians with mobility issues and visual impairments, wheelchair users, and people pushing prams.

- 4.7 The proposed introduction of low level planting and/or new trees at 1. Hadley Street and Castle Road, 2. Handel Street, Kenton Street, and Hunter Street, and 3. Maresfield Gardens would also potentially have positive benefits for all of the groups with protected characteristics by improving the look and feel of the streetscape at those locations, thereby making walking and cycling a more pleasant experience. The proposals would also have potentially positive impacts for all of the groups with protected characteristics by improving biodiversity, reducing the impacts of flooding, and responding to the impacts of climate change.
- 4.8 The proposed removal of resident permit holder parking spaces, pay-by-phone parking bays and the introduction of additional double yellow lines at some of the scheme locations may have an impact on certain groups with protected characteristics, for example Age, Disability, and Pregnancy and Maternity. Section 6 of this report and **Appendix A** to this report address the key negative impacts on individuals within the protected groups, their risks and the mitigating measures proposed by the removal of parking spaces and the introduction of double yellow lines.
- 4.9 The proposal would not involve the loss of any disabled parking bays. Blue badge holders can park in resident permit holder bays, shared use parking bays, and paid for parking bays without time limit, and in blue badge parking bays where time limits may apply (displayed on signs). Blue badge holders can also park for a maximum of three hours on a single or double yellow lines, where permitted. Guidance on how and where blue badges can be used is available on our website [here](#). Officers therefore feel that the proposal would have a minor impact, only, on the availability of parking opportunities for blue badge holders.
- 4.10 Providing safer and legitimate cycling conditions at the 7 scheme locations, particularly on Alfred Place, Handel Street, Kenton Street, and Hunter Street, could help increase the propensity of less confident cyclists (statistically, often women) to cycle, thereby potentially improving their mental and physical health and access to services and employment.
- 4.11 Providing safer walking and cycling conditions at the 7 scheme locations could increase the propensity of children and older people to walk and cycle, thereby potentially improving their mental and physical health, independent mobility, social inclusion, and improved access to opportunities.
- 4.12 Disabled people have the most to gain from the health benefits of active travel: disabled people are among the least active groups in Camden which affects individuals' risk to a wide range of diseases, long term health and well-being. Safer streets help to create an environment where disabled people can be more confident to walk, wheel, and cycle. Cycling is increasingly seen by the medical profession as a mobility aid for some people with a mobility disability, and for some, easier than walking. Providing improved safety and infrastructure gives disabled people the option of choosing to cycle, should they wish to. This in turn enables disabled people to access the physical benefits and independent

mobility that comes with cycling. Providing improved junctions with better sightlines will make it safer for disabled people to cross the road.

- 4.13 The proposals would help improve conditions for cycling for all users, including people within the protected group 'Ethnicity or Race' who are under-represented as cyclists.
- 4.14 Places of worship and faith-based schools are major destinations for larger populations from different groups, particularly on certain dates and at certain times of the day. There are a number of places of worship in the vicinity of the 7 scheme locations. Providing safer pedestrian crossings and walking conditions to groups accessing these places of worship and faith-based schools would subsequently improve their mental and physical health associated with walking (1. Belsize Terrace, 2. Hadley Street and Castle Road, and 3. Handel Street, Kenton Street, and Hunter Street).
- 4.15 Providing an improved junction with better sightlines and safer pedestrian crossings and walking conditions at Handel Street and Castle Road would make it safer for pregnant women or women with young children to cross the road. This could increase the propensity of pregnant women or women with young children to walk, thereby improving their mental and physical health, independent mobility, social inclusion, and improved access to opportunities.
- 4.16 Other identified risks and mitigations are identified in the table below.

Risks	Mitigation
<p>Some concerns were raised during the public consultation period that walking in general, pedestrians crossing the road, and driving would become less safe as more cyclists use the road.</p>	<p>Officers have noted the responses to the consultation and the comments provided. It is an integral part of the Camden Transport Strategy that we work to improve facilities for cyclists across the borough. Furthermore, there are significant health and safety benefits for cyclists in providing routes away from main roads, both in terms of reducing risk of collisions and reducing exposure to harmful pollutants.</p> <p>The proposals have been developed in accordance with Local Transport Note (LTN) 1/20 (Cycle Infrastructure Design), the London Cycling Design Standards (LCDS), and other relevant design guides and standards.</p> <p>In addition, independent Road Safety Audits (RSAs) were undertaken on the scheme designs, and the auditors did not raise any significant concerns. If approved, and once constructed, a Stage 3 RSA will be undertaken on each scheme. This will flag up</p>

	<p>any road safety concerns associated with the designs that may affect all users of the public highway, and officers will consider any recommendations as part of the detailed design for each scheme. Officers will also continue to monitor any issues arising going forward, if approved for final implementation.</p>
<p>Some concerns were raised during the public consultation period about motor vehicles driving and speeding in the wrong direction on one-way streets.</p>	<p>Independent RSAs were undertaken by consultants for the 7 schemes within the Cycle Permeability Phase 4 programme at outline design stage. The auditors did not raise any significant concerns. Once constructed, the schemes will go through a Stage 3 RSA. This will flag up any road safety concerns associated with the design that may affect all users of the public highway, and officers will consider any recommendations as part of the detailed design for each scheme.</p> <p>Officers will also continue to monitor any issues arising going forward, if approved for final implementation.</p>

5. TIMETABLE FOR IMPLEMENTATION AND NEXT STEPS

- 5.1 Subject to approval by the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, the required amendments to existing Traffic Management Orders (TMO) would be advertised in the local press (Camden New Journal and the London Gazette) in Autumn 2024. Subject to any objections, the new TMOs would be made and published in the local press. If any objections to the proposed TMO amendments are submitted, the Council would consider these in a separate TMO Objections Report as required.
- 5.2 Subject to any objections and if necessary, the consideration of a TMO Objections Report, the proposals outlined in Section 2 of this report would then be constructed in Winter 2024/2025, subject to the availability of the highways term contractor. Planting of low level plants and new trees would also be undertaken in Winter 2024/2025 (planting season runs from October to March).

6. CONSULTATION/ENGAGEMENT

- 6.1 Public consultations on the 7 scheme proposals outlined in Section 2 of this report were undertaken from 15th February 2024 to 7th March 2024. The consultations were undertaken using 2 different methods. The larger scale schemes (1. Hadley Street and Castle Road, 2. Handel Street, Kenton Street and Hunter Street, and 3. Maresfield Gardens) were consulted on via a [We Are Camden](#) online consultation and flyers and street notices containing a link and

QR code to the online consultation. The smaller scale schemes (4. Alfred Place, 5. Belsize Terrace, 6. Herbrand Street, and 7. Streatham Street) were consulted on via letters and site notices only. Residents were given the opportunity to comment on the proposals by emailing safetravel@camden.gov.uk.

- 6.2 An email, requesting feedback on the proposals was sent to Local and Statutory Groups, Emergency Services, and Ward Councillors. All views received have been carefully considered as part of the preparation of this report and supporting appendices.

1. Hadley Street and Castle Road – Camden Town and Kentish Town South wards

- 6.3 In total, 23 responses were received on the We Are Camden consultation page, and 2 responses were received via the Safetravel email inbox. Responders were asked 4 questions about what they thought about each part of the proposal on the We Are Camden page. A response was received from the Camden Cycling Campaign. A detailed overview of the responses is provided in **Appendix B**.

- 6.4 A high level summary of the responses to each specific scheme related question is provided in the table below.

Question / Response	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Unsure	Not Answered
Widen pavement at the location of the existing motor vehicle restriction	15 (65.2%)	1 (4.3%)	0 (0%)	0 (0%)	6 (26.1%)	1 (4.3%)	0 (0%)
Widening Pavement South Side of Hadley Street and Castle Road	14 (60.9%)	4 (17.4%)	1 (4.3%)	2 (8.7%)	2 (8.7%)	0 (0%)	0 (0%)
Cycle Hangers and Removal of Pay by Phone Parking on Hadley Street and Castle Road	14 (60.9%)	5 (21.7%)	2 (8.7%)	1 (4.3%)	1 (4.3%)	0 (0%)	0 (0%)
Cycle Hangers and Removal of Pay by Phone Parking Hadley Street and Castle Road	14 (60.9%)	5 (21.7%)	2 (8.7%)	1 (4.3%)	1 (4.3%)	0 (0%)	0 (0%)

2. Handel Street, Kenton Street and Hunter Street – Bloomsbury ward

6.5 In total, 27 responses were received on the We Are Camden consultation page, and 2 responses were received via the Safetravel email inbox. Responders were asked 5 questions about what they thought about each part of the proposal on the We Are Camden page. Responses were received from the Camden Cycling Campaign, Friends of Marchmont Community Garden, and the Metropolitan Police. A detailed overview of the responses is provided in **Appendix B**.

6.6 A high level summary of the responses to each specific scheme related question is provided in the table below.

Question / Response	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Unsure	Not Answered
Two-way cycling on Handel and Kenton Street	11 (40.7%)	2 (7.4%)	2 (7.4%)	3 (11.1%)	8 (29.6%)	1 (3.7%)	0 (%)
Double Yellow Lines on Handel and Kenton Street	10 (37%)	2 (7.4%)	2 (7.4%)	3 (11.1%)	10 (37%)	0 (%)	0 (%)
Cycle Stands and Pavement Widening on Handel and Kenton Street	11 (40.7%)	2 (7.4%)	5 (18.5%)	0 (0%)	9 (33.3%)	0 (0%)	0 (0%)
Continuous Footway Handel and Kenton Street	13 (48.1%)	3 (11.1%)	4 (14.8%)	2 (7.4%)	5 (18.5%)	0 (0%)	0 (0%)
Hunter Street Cycle Lane	8 (29.6%)	2 (7.4%)	4 (14.8%)	1 (3.7%)	12 (44.4%)	0 (0%)	0 (0%)

3. Maresfield Gardens – Belsize ward

6.7 In total, 42 responses were received on We Are Camden consultation page, and 2 responses were received via the Safetravel email inbox. Responders were asked 2 questions about what they thought about each part of the proposal on the We Are Camden page. Responses were received from the Camden Cycling Campaign Group, South Hampstead High School, and Green School Runs. A detailed overview of the responses is provided in **Appendix B**.

6.8 A high level summary of the responses to each specific scheme related question is provided in the table below.

Question / Response	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Unsure	Not Answered
Widening Cycle Lane	15 (35.7%)	4 (9.5%)	4 (9.5%)	6 (14.3%)	12 (28.6%)	1 (2.4%)	0 (%)
Cycle Hangers and Extension of Double Yellow Lines	15 (35.7%)	4 (9.5%)	4 (9.5%)	6 (14.3%)	12 (28.6%)	1 (2.4%)	0 (%)

4. Streatham Street – Bloomsbury ward

- 6.9 Four responses to the proposals were received via the Safetravel email inbox during the consultation period for the Streatham Street proposal. This can be broken down into 3 supportive responses and 1 objection or concern. A response from the Camden Cycling Campaign was received. A detailed overview of the responses is provided in **Appendix B**.

5. Alfred Place – Bloomsbury ward

- 6.10 Four responses to the proposal from residents were received via the Safetravel email inbox during the consultation period for the Alfred Place proposal. This can be broken down into 2 supportive responses and 2 objections or concerns. Responses were received from the Camden Cycling Campaign and the Metropolitan Police. A detailed overview of the responses is provided in **Appendix B**.

6. Herbrand Street – Bloomsbury ward

- 6.11 Seven responses to the proposals were received via the Safetravel email inbox during the consultation period for the Herbrand Street proposal. This can be broken down into 3 supportive responses and 4 objections or concerns. A response from the Camden Cycling Campaign was received. A detailed overview of the responses is provided in **Appendix B**.

7. Belsize Terrace – Belsize ward

- 6.12 Eighteen responses to the proposals were received via the Safetravel email inbox during the consultation period for the Belsize Terrace proposal. This can be broken down into 2 supportive responses, 5 responses which were in favour of some parts of the scheme but not others, and 11 objections or concerns. Responses were received from the Camden Cycling Campaign, Belsize Village Association, Belsize Village Business Association, Friends of Belsize Village Committee, and Ward Councillors. A detailed overview of the responses is provided in **Appendix B**.

Further engagement

- 6.13 In addition to the statutory TMO consultation, if approved, the following engagement activities would be undertaken prior to implementation:
- A notification letter would be sent to all properties within the notification areas for the 7 schemes (as per the consultation area maps within **Appendix B**) informing local residents, businesses, and organisations of the outcome of the consultation/decision and providing details for when the schemes would be constructed.
 - The notification letters would also be sent to local stakeholders identified through the CINDEK database, including Ward Members.
 - The Council's Twitter feed would be used to notify all stakeholders of the outcome of the consultation/decision and providing details for when the schemes would be constructed.

- o Dedicated webpage on Camden's [Safe and Healthy Streets Commonplace webpage](#), providing details of the schemes and links to the decision report.

7. RESOURCE IMPLICATIONS

- 7.1 This report seeks approval from the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, for implementing proposed changes at 7 scheme locations, as outlined in Section 2 of this report.
- 7.2 The estimated cost of implementing the proposed changes is £180,000, subject to detailed design, as set out in table 1 below.

Location (ward)	Funding Source	Bike Hangars	Street Trees	Cost
Alfred Place (Bloomsbury)	Transport for London Local Implementation Plan	0	0	£5,000
Belsize Terrace (Belsize)	Camden Healthy Streets Council Capital	0	0	£40,000
Hadley Street (Camden Town and Kentish Town South)	Camden Healthy Streets Council Capital	4	3	£50,000
Handel Street, Kenton Street, and Hunter Street (Bloomsbury)	Camden Healthy Streets Council Capital	0	0	£50,000
Herbrand Street (Bloomsbury)	Transport for London Local Implementation Plan	0	2	£15,000
Maresfield Gardens (Belsize)	Transport for London Local Implementation Plan	2	0	£15,000*
Streatham Street (Bloomsbury)	Transport for London Local Implementation Plan	0	0	£5,000
Total	Total	6	5	£180,000

Table 1 – Scheme Implementation Costs (* denotes sites including low level planting)

- 7.3 The proposals, if approved, will result in the loss of 15 metres of paid-for-parking bay (equivalent to 3 spaces). An analysis of parking bay utilisation at the 2 relevant scheme locations (Hadley Street and Castle Road, and

Maresfield Gardens), undertaken by Camden's parking operations team, estimates the potential financial impact (loss) of removing these bays is circa £15,000 per annum in total.

8. FINANCE COMMENTS OF THE EXECUTIVE DIRECTOR CORPORATE SERVICES

- 8.1 This report outlines proposed changes at 7 scheme locations as set out in more detail in section 2 of the report.
- 8.2 As set out in section 7 above, the expected cost of the proposed changes would be £180,000, subject to detailed design. This would be fully funded through the service's capital resource project 'Cycle Permeability Scheme code 1060048'. Allocations of £40,000 of Transport for London Local Implementation Plan funding and £140,000 of Camden Healthy Streets Council Capital funding would be attributed to that code to pay for these works.
- 8.3 There is a revenue implication as the proposals would result in the loss of 3 paid-for-parking spaces, currently estimated at £15,000 per annum. Camden's Parking operations Team will look to manage this pressure within existing revenue resource budgets if the proposals are approved.
- 8.4 There are no MTFS savings identified from this report and inflation has been allowed for within the costings.

9 LEGAL COMMENTS OF THE BOROUGH SOLICITOR

- 9.1 The recommendations in this report are being considered in the Council's capacity as the Local Highway/Traffic Authority for the Borough.

Highways Act Powers

- 9.2 Part V (Improvement of Highways) of the Highways Act 1980 contains a general power of improvement, which – subject to certain limitations – permits a highway authority to carry out improvement works not covered by specific improvement works within Part V.

Road traffic powers

- 9.3 Parts I and II of the Road Traffic Regulation Act 1984 ("RTRA") empower the Council to regulate or restrict traffic on roads, and Part IV to designate or provide parking places, including providing stands or racks for devices for securing bicycles, within the Borough by Traffic Regulation Order for a range of purposes.
- 9.4 Section 4 of the Cycle Tracks Act 1984 (provision of barriers in cycle tracks, etc) empowers a highway authority to provide and maintain, in any cycle track constituting or comprised in a public highway, such barriers as they think necessary for the purpose of safeguarding persons using the cycle track; and, where a cycle track is adjacent to a public footpath or footway, provide and

maintain such works as they think necessary for the purpose of separating, in the interests of safety, persons using the cycle track from those using the footpath or footway. The highway authority may alter or remove any works provided by them under section 4 of the 1984 Act.

- 9.5 Under section 6(1) of the RTRA1984 (orders similar to traffic regulation orders), as a traffic authority within Greater London the Council may make an order for controlling or regulating vehicular and other traffic (including pedestrians) on roads within the Borough for which it has responsibility. Such an order may be for any of the purposes or with respect to any of the matters mentioned in Schedule 1 to the RTRA and for any of the purposes mentioned in paragraphs (a) to (g) of section 1(1) (traffic regulation orders outside Greater London) of that Act. Such an order may be made only where it appears to the authority that is expedient to make the order for the purpose(s) in question.
- 9.6 Section 122(1) of the RTRA confers a duty on the Council to exercise its functions under that Act (so far as practicable having regard to the matters specified in section 122(2)) 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. The matters specified by section 122(2) are:
- (a) the desirability of securing and maintaining reasonable access to premises;*
 - (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;*
 - (c) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);*
 - (d) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and*
 - (e) any other matters appearing to ... the local authority ... to be relevant.”*

Road Traffic Act 1988

- 9.7 Section 39 of the RTA 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

- 9.8 The Council, as highway authority, must have regard to statutory guidance issued by the Secretary of State under section 18 of the Traffic Management Act 2004 when delivering their network management duty under the RTRA 1984.
- 9.9 The Network Management Duty Guidance was published in November 2004. In terms of public consultation, it states that the local traffic authority should seek the views of residents, local businesses, and the different road users both when deciding which policies on network management to adopt and when monitoring whether these policies are delivering the required outcomes. Such consultation should preferably be part of the authority's overall public consultation programme.

The Mayor of London's Transport Strategy

- 9.10 The Mayor's Transport Strategy 2018 is issued under Part V of the Greater London Assembly Act 1999 (Transport), specifically section 144(2) (duties of London borough councils etc.) which empowers the Mayor to issue guidance to London borough councils, among other bodies and persons. Under section 144(1) London borough councils are to have regard to the guidance in exercising any function.

Statutory Consultation

- 9.11 In *R (on the application of Moseley) v London Borough of Haringey* [2014] UKSC 56, the Supreme Court approved a list of four legal requirements relating to public consultation, which had previously been approved by the Court of Appeal in *R v Brent London Borough Council ex parte Gunning* (1985) 84 LGR 168 – and therefore often referred to as the 'Gunning' or 'Sedley' requirements. These are that:
1. consultation must be at a time when the authority's proposals are still at a formative stage;
 2. the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
 3. adequate time must be given for consideration and response; and
 4. the product of consultation must be conscientiously taken into account in finalising any proposals.
- 9.12 In terms of the fourth point, the decision maker must consider consultation responses with 'a receptive mind' (*R v Camden London Borough Council ex parte Cran* [1995] EWHC 13 (Admin)) and be prepared to change course if persuaded (*R v London Borough of Barnet ex p B* [1994] ELR 357). But there is no duty to adopt the views of consultees (*R (Smith) v East Kent Hospital NHS Trust* [2002] EWHC 2640 (Admin)).

Equality

- 9.13 The Council must, when carrying out the Council's functions (which includes making decisions), have due regard to 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 Equalities Impact Assessment (EQIA) is attached as **Appendix A** to this report. The relevant decision-maker must carefully consider the EQIA as applicable to the scheme they are asked to approve. A Strategic Policy and Alignments document is provided in Appendix C of this report.
- 9.14 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).
- 9.15 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.
- 9.16 In addition, with reference to disability, the Council has a duty under section 29 of the Equality Act 2010 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.
- 9.17 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. 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).
- 9.18 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).

- 9.19 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.
- 9.20 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.

10 ENVIRONMENTAL IMPLICATIONS

- 10.1 The proposals detailed within this report would be expected to have positive implications for the environment, encouraging reduced general traffic movements and supporting sustainable modes of transport such as walking and cycling which help to improve air quality and reduce greenhouse gas emissions. The proposals strongly align with the objectives of the [Clean Air Strategy and Clean Air Action Plan](#), and the [Climate Action Plan](#).
- 10.2 The proposed changes, including low level planting at one site and tree planting at two sites (subject to ground condition surveys), would be expected to have environmental benefits, helping to reduce the impact of climate change, whilst also improving biodiversity. This would contribute to the Biodiversity Action Plan (currently being prepared) ambition of greening our streets and providing habitats for pollinating insects.

11 APPENDICES

- Appendix A – Equality Impact Assessment
- Appendix B – Consultation Summary Report
- Appendix C – Strategic and Policy Alignments
- Appendix D – Consultation Drawings
- Appendix E – Photo Guide

REPORT ENDS