

<b>Contains Confidential or Exempt Information</b>	<b>NO</b>
<b>Title</b>	<b>COVID Emergency Low Traffic Neighbourhoods – Interim Assessment</b>
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<b>For Consideration By</b>	Cabinet
<b>Date to be Considered</b>	8th December 2020
<b>Implementation Date if Not Called In</b>	21 <sup>st</sup> December 2020
<b>Affected Wards</b>	All
<b>Keywords/Index</b>	COVID transport measures, LTNs, active travel

**Purpose of Report:**

To present the interim assessment findings of the low traffic neighbourhoods (LTNs) and proposes some changes to the LTNs arising from a review of the interim assessment.

**1. Recommendations**

It is recommended that Cabinet:

- 1.1 Notes the current position with regard to the LTNs introduced following the decisions made by Cabinet on 16th June 2020
- 1.2 Notes the interim assessment monitoring of the impact of the LTNs undertaken since their implementation
- 1.3 Notes and agrees in particular to changes to the LTN schemes, as outlined in paragraph 3.5 below which includes;
  - A programme of replacing bollards with camera enforcement
  - Allowing an exemption for Blue Badge holders within their own LTN
  - Allowing an exemption for Council authorised vehicles taking mobility impaired persons
- 1.4 Delegates authority to the Director of Place Delivery to implement the changes proposed, either by way of a modification to the existing orders or by means of

new orders as appropriate, including any procedures required for authorising exempted vehicles, following consultation with the Portfolio Holder for Environment and Highways and the Portfolio Holder for Regeneration and Transport and the Director of Legal & Democratic Services.

- 1.5 Notes that any modification or creation of an ETO triggers a new 6-month objection and consultation period.

## **2. Reason for Decision and Options Considered**

### **2.1 Background**

On 11<sup>th</sup> May 2020, The Right Honourable Grant Shapps, MP, Secretary of State for Transport announced a new national programme of Emergency Transport Measures to reallocate road space to cyclists and pedestrians in response to the COVID 19 (COVID) pandemic. It was supplemented by updated statutory guidance and associated regulation from the Department for Transport (DfT) on the Traffic Management Act 2004.

In his foreword to the details of the scheme, Mr Shapps, states: “The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel.” The guidance advises councils to reallocate road space in order to cater for significantly increased numbers of cyclists and pedestrians. The proposals outlined from Government are designed to:

- Encourage people to continue cycling, recognising that with public transport capacity reduced, the roads in the largest cities, may not be able to cope without it.
- Enable social distancing to be in place, more space being made available for pedestrians, particularly in busier areas like town centres.
- Support fitness. Indications are that there is a significant link between COVID-19 recovery and fitness. Active travel can help us become more resilient.
- Embed what DfT have called a once in a generation opportunity to deliver a lasting transformative change in how we make short journeys in our towns and cities.
- Promote active travel, which is affordable, delivers significant health benefits, has been shown to improve wellbeing, mitigates congestion, improves air quality and has no carbon emissions at the point of use.

Following the announcement by Mr Shapps, The Mayor of London also launched the ‘Streetspace’ programme to administer the central Government funding within London. This programme was informed by data that showed that, before the pandemic, many car trips in London were for short distances. About a third of these could be walked in under 25 minutes, and two thirds could potentially be cycled in less than 20 minutes. During the earlier London lockdown, there were significant increases in walking and cycling as traffic volumes on roads fell. Such changes in travel behaviour are considered a positive given they can lead to increased physical activity levels and reduced environmental impacts – for example London’s air

pollution fell significantly during lockdown, in some areas by up to 50 per cent. The Mayor's programme therefore sought to secure change in behaviour by making amendments to the network to support more trips being made on foot and by bike. London Boroughs were encouraged to support this programme and funding was also secured from the Department of Transport to facilitate this. Transport for London (TfL) produced Interim Guidance to Boroughs on the London Streetspace Plan, which contained the application process. This was circulated to Boroughs on 15th May 2020. The document identifies 3 key criteria on which schemes will be awarded funding:

- Deliverability (The guidance required local authorities to make these changes 'as swiftly as possible').
- Location and Borough (assessment of locations where social distancing is an issue, overcrowding is likely and will pose safety concerns, and where transport, economic and social datasets show a need to intervene).
- Value (the guidance required the use of cheap temporary materials).

## 2.2 Ealing Streetspace Programme

To respond to these challenges and opportunities, and in line with new statutory guidance issued by the Government and the Mayor of London, the Ealing Streetspace Programme was agreed by June 2020 Cabinet. This is a programme of active travel and social distancing measures in response to; and to aid both economic and social recovery from the Covid-19 pandemic. Ealing's Streetspace programme included:

- The introduction of 12 **School Streets** around schools where motor traffic is restricted at pick-up and drop-off times, during term-time. Effective in encouraging more walking and cycling, particularly where good facilities exist on routes to the school and where the parents, children and school are involved as part of the scheme development. To date ten have commenced with the remaining two schools starting shortly.
- Installing 6 '**pop-up**' **Cycle Schemes** with physical separation from volume traffic using light segregation features such as flexible plastic wands; or quickly converting traffic lanes into temporary cycle lanes (suspending parking bays where necessary); widening existing cycle lanes to enable cyclists to maintain distancing. Three have been installed with a further three to be installed shortly.
- Implementation of 10 **Low Traffic Neighbourhoods (LTNs)** with modal filters; closing roads to motor traffic to minimise cut through, by using planters or large barriers within residential areas creating neighbourhoods that are low-traffic or traffic free and a pleasant environment that encourages people to walk and cycle and improving safety. Nine have been implemented, with the remaining LTN delayed due to further discussion with TfL.

*Note: Other funding grants were used to implement footway extensions and an additional cycle lane.*

### 2.3 Implementation of COVID Schemes

As confirmed in the June 2020 Cabinet report, COVID schemes were progressed on the basis of priorities agreed following consultation with portfolio holders as follows:

- Encourage active travel measures to enable residents to walk and cycle around the borough to assist social distancing, relieve public transport capacity and reduce the need for car journeys.
- Active travel is affordable, delivers significant health benefits and has been shown to improve well-being, mitigate congestion, improve air quality and can help individuals to become more resilient.
- The DfT and TfL both outlined this as an opportunity to deliver transformative change in how we make short journeys in our towns and cities.
- These schemes support the Council's recovery programme, climate emergency action plan and air quality priorities.

The process for implementing a Streetspace scheme particularly referencing the low traffic neighbourhood scheme includes:

1. LTN's schemes identified in the "long list" in the June Cabinet report are reviewed and refined by officers, cabinet members.
2. Officers review proposals for compliance with statutory guidance, technical feasibility, potential impacts (including on those with protected characteristics under Equalities Act) and the cost.
3. Viable schemes discussed with Lead Members for Regeneration & Transport, and Environment & Highways and determination made as to whether or not to proceed to trial.
4. Engagement with ward councillors. The Streetspace programme is a borough wide initiative with the outline details of all proposed LTN schemes contained within the Cabinet report. Ward councillors were informed of the LTN proposals and encouraging ongoing engagement.
5. Engagement with statutory consultees where required e.g. emergency services. See (3.2.1). Schools have also been engaged on specific measures to improve safety outside their premises through the use of 'school streets'.
6. Determination of progression to trial implementation (via a temporary or experimental traffic order). This is set out in the record of the Officer Decision published on the council's website on 23 October 2020.
7. Announcement of the implementation. Notification letters to residents and businesses within the vicinity of the proposed schemes were distributed 7 days prior to implementation. Through this process, interested parties are encouraged to provide feedback via the designated email addresses to add both email addresses. An online public engagement platform 'Commonplace' was procured and went live on 23<sup>rd</sup> October 2020 to encourage feedback on the LTN's schemes.
8. Trial LTN scheme implemented.
9. Data collection to ascertain as far as practicable impact of the scheme. Monitoring & collation of feedback provided to the council via both consultation and emails. Feedback received through the mechanisms is then considered at the point at which the council determines whether or not to make the scheme, or any aspects of it, permanent (more information on this below).

10. Emergency modifications if required. This decision will be made under Officer delegation following consultation with the relevant Lead Member.
11. Interim assessment. This allows for any schemes to be reviewed in the light of feedback received and any available data collected. As set out below, this review is to be undertaken with the support of an independent consultant.
12. Statutory Formal review. This formal review will update the interim assessment for all Streetspace schemes and will also be collated supported by the independent consultant. At this point a decision is made as to whether trial continues, is removed (entirely or in part) or made permanent. This decision will be taken by Cabinet and/or the relevant Lead Member and/or Director of Place Delivery officer delegation, dependant on the nature of the street scape scheme and representations received.

In total, 9 schemes have been implemented:

<b>Scheme</b>	<b>Reasons for Implementation</b>
LTN 48: Adrienne Ave	Prevent traffic using Adrienne Ave to go from northbound on Lady Margaret Road to westbound on Ruislip Road to avoid the roundabout.
LTN 34: Bowes Road	Prevent traffic using Bowes Road to leapfrog the eastbound queue on East Acton Lane heading towards Savoy Circus
LTN 8: Olive Road	Prevent traffic using Olive Road to 'turn right' from Pope's Lane to South Ealing Road, avoiding the signals
LTN 32: Junction Rd	Prevent numerous 'cut through' routes in a residential area
LTN 35: Mattock Lane	Prevent using Mattock Lane to avoid having to queue to turn left at the Bond Street signals onto Uxbridge Road.
LTN 21: W Ealing South	Prevent numerous 'cut through routes' in a residential area
LTN 25: Acton Central	Prevent numerous 'cut through routes' in a residential area
LTN 20: W Ealing North	Prevent traffic using Eccleston, Felix and Alexandria to avoid having to queue to turn left at the Lido signals into Drayton Green Road.
LTN 30: Loveday Road	Prevent numerous 'cut through routes' in a residential area

A map of the LTNs is shown in Appendix B.

## **2.4 Consultation and Response**

The schemes were introduced by means of Experimental Traffic Orders (ETOs), following Government guidelines and, given that the conditions for the funding were to install schemes quickly, using temporary materials. This meant that it was not possible (or a legal requirement) to carry out the same level of pre-engagement undertaken for permanent orders. However, the ETO process includes a six-month statutory objection period from the time the ETO is published and during which we have launched an online public engagement platform 'Commonplace'.

There have also been around 3,250<sup>1</sup> emails with feedback and questions sent to the COVID transport inbox (a dedicated inbox set up for this purpose) and about 1,500<sup>1</sup> emails to the Traffic Notices inbox (the inbox for statutory responses to the ETO consultation).

Commonplace is an online engagement platform. It allows people to make comments and share their views with others. It has been used by the Council previously and is being used by several other London boroughs for their LTN engagement. Currently the Council is utilising the “Community Heatmap” tool, which allows users to virtually “drop a pin” onto a map to add their ideas and comments. The site had over 11,000<sup>1</sup> visitors, with about a quarter of those contributing to the site, leaving around 5000<sup>1</sup> comments and over 35,000<sup>1</sup> “likes” of other comments.

There has been strong support as well as strong opposition to the introduction of LTNs. Five out of the nine schemes are the subject of a legal challenge currently listed for hearing at the High Court in February 2021.

The Council is robustly defending the legal challenges. However, given the unusual circumstances of the installation of the LTNs and the level of public interest, it was felt important to monitor the scheme installation and their impacts to consider whether any changes are required to the design and/or operation of the LTNs at the approximate mid-point of the ETO six month period.

## **2.5 Interim Assessment & Formal Review**

As required by Government, the Council is proceeding at pace with these changes, by using Experimental Traffic Orders that see wider consultation happening in parallel with the trial.

Trial schemes may be modified or even removed altogether based on evidence and consultation. Schemes may also deliver on the objectives of the programme and contribute to our wider policies around addressing the climate emergency and air quality and so may be made permanent. We also recognise that these schemes generate strong and diverging opinion and views, and therefore, throughout the process, we are encouraging residents, business and other stakeholders to provide us with their feedback on the schemes.

The LTNs are continually being monitored and reviewed as per the requirements of the Experimental Traffic Order. Where immediate action has been identified, changes have already been undertaken, for example, replacing some bollards with enforcement cameras and adding additional planters to prevent vehicles from driving on footways.

As time progresses, more data will become available, therefore, the interim assessment will not be as in-depth as the final review. In addition, it was always recognised that LTN schemes take some time to “settle in”, particularly from a traffic point of view as drivers adapt their journeys. It is normal for some larger schemes to

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<sup>1</sup> Figures correct at the time of writing on 24<sup>th</sup> November 2020

take months to settle before a long-term pattern is set. However, the full data set should be available for the six-month review to coincide with the decision on whether to make the scheme permanent or not.

The interim assessment has used data gathered up to the end of November 2020, in order to provide a single report on all the LTNs for Cabinet. The interim assessment identifies whether any changes are recommended in the design or operation of the LTNs due to any on-going and significant negative impact directly attributable to an LTN. These are set out in paragraph 3.5 below

The final review will use data gathered up to the end of the first six-month ETO process. Each LTN will have its own report, which will be used to make the recommendation on whether to make the scheme permanent or not.

The following evidence has and will be taken into consideration when reviewing each individual scheme for both the interim assessment and the six-month review.

### **Summary of Monitoring Data Sources and Timing**

<b>Element</b>	<b>Source</b>	<b>Baseline</b>	<b>Current monitoring</b>	<b>Interim</b>	<b>Final</b>
Main/Boundary Road traffic	Traffic Light/SCOOT data	Y	Y	Y	Y
	Open source data (e.g. Google, FLOOW, Inrix)	Y	Y	Y	Y
	iBus data	Y	Y	Y	Y
		Y	Y	Y	Y
Main/Boundary Road Air Quality	Permanent AQ Monitoring sites	Y	Y	N	Y
Internal Road traffic	Traffic survey	Some	Y	N	Y
Internal Road Air Quality	Air Quality diffusion tubes	N	Y	N	Y
Equalities impacts	Focus group and/or survey	N	Y	N	Y
Business Impacts	Focus group and/or survey	N	Y	N	Y
Emergency Service response times	Emergency service feedback	Y	Y	Y	Y
Resident feedback	Emails	n/a	Y	Y	Y
	Commonplace	n/a	Y	Y	Y
	Focus Group	N	Y	N	Y
Councillor feedback	Emails	n/a	Y	Y	Y
	Focus Group	N	Y	N	Y

It is important to recognise, therefore, that this interim assessment does not contain all the data the Council is collating on the impacts of LTNs, therefore, the analysis is not complete.

### 3. Key Implications

The inputs for the Interim Assessment process are:

- Feedback from Residents and stakeholders
  - Emails and other direct communications to Traffic Notices, COVID transport, Councillors and officers
  - Commonplace
  - Emergency services feedback
- Feedback from Councillors
  - Emails
  - Face to face meetings
- Surveys and data
  - Traffic and bus data from TfL or other sources
  - Bespoke traffic surveys where issues are identified

The detailed results of the Interim Assessment are available in **Appendix A** of this report. However, the main conclusions from the data are as follows: *[note: in this section the expression “specific issues” relates to suggestions for changes or improvements to the design and/or operation of the individual LTN]*

#### 3.1 Feedback from Residents and Local Businesses

##### 3.1.1 Initial Analysis of the Feedback

As stated in section 2.4 above, there have also been around 3,250<sup>2</sup> emails with feedback and questions sent to the COVID transport inbox and about 1,500<sup>2</sup> emails to the Traffic Notices inbox. In addition, on Commonplace there were 5000<sup>2</sup> comments and over 35,000<sup>2</sup> “likes” of other comments.

As is usual with Public Consultations on traffic schemes where an element of behavioural change is required, the majority of comments were negative or opposed to the proposals. All comments will be considered as part of the assessment no matter which method they arrive by and there is no weighting applied. The table below shows the levels of support and opposition for all LTNs, although some emails only contained questions or queries so did not necessarily explicitly state support or opposition.

It should be noted, however, that within the numbers above, there is a significant level of duplication, as many individuals have written multiple e-mails or added multiple entries on Commonplace. There are also individuals that have commented via all 3 methods. The final reports intend to analyse the entries to account for this.

It should also be noted that a significant amount of feedback was received prior to the start of the trial and a proportion of these contain misunderstandings or mis information. There have also been conscious attempts to create misinformation, particularly on social media in order to influence the consultation.

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<sup>2</sup> Figures correct at the time of writing on 24<sup>th</sup> November 2020

Method Received	Support	Opposition
COVID Transport inbox	177	491
Traffic Notices Inbox	363	818
Commonplace <sup>3</sup>	994	3422

For context there are approximately 20,750 households within the LTNs.

### 3.1.2 General Concerns from Residents

The vast majority of the feedback received was not specific to an LTN location, the operation or design of the LTNs, but rather general issues either opposing or supporting the principle of LTNs.

The five most common general concerns/objections raised were:

Issue	LBE response
Lack of prior consultation	See section 2.4
Impacts on emergency services	Officers meet with representatives from the emergency services regularly. Where specific requests have been made to replace bollards with cameras, this has been done immediately.
Impacts on boundary roads: specifically, on making both congestion and air quality worse	The Council has stated that it expects boundary road traffic to reduce as the scheme beds in, if the pattern mirrored that monitored in Waltham Forest
The potential effect on access for people with disabilities (i.e. people for whom a car is a mobility aid), including their carers	Access has been maintained to every property within the LTN.
Longer journeys and journey times	The Council's policy, as stated in the Transport Strategy, is to shift the mode of travel from the car to walking and cycling for appropriate (particularly short) journeys. Access is however, maintained for motor vehicles to every property within the LTN.

The three most common reasons for supporting the LTNs were:

Issue	LBE response
An appreciable improvement in air quality within the LTN	The Council has placed diffusion tubes within every LTN and will be monitoring NOx. This will be reported in the final report for each LTN.

<sup>3</sup> Support is a combination of "positive" and "Mostly positive" comments. Opposition is a combination of "negative" and "mostly negative" comments. A neutral option was also included and reported in Appendix A.

A noticeable reduction in the number of speeding motor vehicles within the LTN, leading to reduced concerns about road safety	The Council does not currently have traffic speed data. This will be reported in the final report for each LTN. It is noted that some have reported the opposite that vehicles are speeding.
A noticeable reduction in traffic noise within the LTN, making it more pleasant to live and be out and about on local streets	Noted, although the Council does not have data on traffic noise within LTNs.

### 3.1.3 Specific Concerns from Residents

*[Note: the section below is not an exhaustive list of every issue brought up in feedback, but is a summary of the valid issues impacting the design and operation of the LTN]*

Issue	LBE response
<b>LTN48 Adrienne Avenue</b>	
With the filter in its current location, there is no direct access between the trading estate and Ruislip Road. Most complaints about vans and lorries from the trading estate now using residential streets have come from Kenilworth residents.	Moving the filter one street south (to just north of Kenilworth) would re-open access between the trading estate and Ruislip Road. But would require a second filter to avoid re-opening the cut through.
<b>LTN34 Bowes Road</b>	
Complaints reference the 'long way round' and general Savoy Circus approach congestion issues.	The Council should explore if there are any specific measures that might help reduce the queue to Savoy Circus.
<b>LTN08 Olive Road</b>	
Westbound queue on Popes Lane has got worse (expected in the short term), and it was already bad in peaks.	The Council should explore if there are any specific measures that might reduce queuing at the Popes Lane/South Ealing Road junction. This would not, however, be funded by the LSP programme and would require TfL's assistance.
<b>LTN32 Junction Road</b>	
Traffic seeking to avoid the South Ealing Road/Pope's Lane/Little Ealing Road lights is now focused on Lawrence Road and Radbourne Avenue.	The Council could implement a no-entry at the junction of Lawrence Road and South Ealing Road to prevent this cut through.

LTN35 Mattock Lane	
“There wasn’t a problem to solve”.	TfL modelling shows significant future traffic as a result of COVID.
No particular specific issues raised beyond the adequacy of signage.	The Council should undertake a specific review of advanced warning signage.
LTN30 Loveday Road	
Significant levels of opposition to the LTN for general reasons (covered above).	TfL modelling shows significant future traffic as a result of COVID.
“There wasn’t a problem to solve”.	As above.
No particular specific issues raised beyond the adequacy of signage.	The Council should undertake a specific review of advanced warning signage.
LTN21 West Ealing South	
Significant levels of opposition to the LTN for general reasons (covered above).	TfL modelling shows significant future traffic as a result of COVID.
Concern about road safety at diagonal closures.	An independent safety audit has been carried out, which did not show any issues, but signage and road markings will be reviewed.
Large levels of vandalism.	The vandalism does make monitoring the impacts of the trial a lot more difficult. Replacing regularly vandalised bollards with cameras should help.
Concerns regarding the adequacy of signage.	The Council should undertake a specific review of advanced warning signage (as above).
LTN25 Acton Central	
There wasn’t a problem to solve”.	TfL modelling shows significant future traffic as a result of COVID.
No particular specific issues raised beyond the adequacy of signage.	The Council should undertake a specific review of advanced warning signage.
LTN20 West Ealing North	
The LTN created an issue for traffic going from Argyle Road to the Uxbridge Road (westbound) is banned from turning right at the Lido junction. The LTN exacerbates this.	The Council should undertake additional surveys at Felix Road and Alexandria Road and subsequently consider the design of the LTN in light of this issue.

### **3.2 Emergency Services**

The Council sought to send all emergency services the proposed scheme plans three weeks in advance of implementation, as per their request. However, due to an administrative error the London Ambulance Service (LAS) did not receive the plans at the correct time. The London Fire Brigade and Metropolitan Police did receive the plans as intended. Officers have had face to face meetings with all the emergency services, including LAS, since then to discuss the schemes, and listen to the services' concerns, where applicable. In addition, the Emergency Services were sent a questionnaire specifically for the Interim Assessment. The London Ambulance Service have since described Ealing's subsequent engagement as a model that could be more widely adopted.

Prior to the installation of the LTNs there were approximately 30 road closures featuring barriers across the Borough, most of which have been in operation for many years. Where emergency service gates were included, all of these used one of two standard "Fire Brigade Keys". This set the initial design standard for the bollard installations given that the Council had received no complaints or concerns over the operation of these gates.

However, as part of the conversations with emergency services, and feedback from others, it is now known that the Police and the LAS prefer not to routinely carry the keys. However, the Council purchased and has supplied additional keys to them as needed. The LAS strongly preferred that some of the drop-down bollards were replaced with camera enforcement. Cameras were, therefore installed at the following locations:

- LTN 20 - Green Man Lane / Singapore Road
- LTN 21 - Leighton Road / Seaford Road
- LTN 21 - Leighton Road / Coldershaw Road
- LTN 21 - Grosvenor Road / Oaklands Road
- LTN 25 - Acacia Road / Cumberland Road
- LTN 30 – Culmington Road / Elers Road
- LTN 30 – Elers Road/ Carew Road
- LTN 32 - Junction Road / Murray Road

Further consultation with the emergency services has shown that camera enforcement is now preferable (although not essential) at other locations.

### **3.3 Ward Members**

Feedback from ward members has been regularly sought throughout the trial. Most ward councillors have sent e-mails citing both their personal, or their constituents' concerns or support as well as reporting issues with vandalism. Ward members will be consulted on the outcomes of the interim assessments and will be involved in the final decisions on the future of the LTNs. Regular briefing meetings have been held for members on the full range of active travel schemes, including LTNs.

In addition, the Council held a Councillor engagement for the Interim Assessment.

General issues raised by ward members during the interim assessment engagement were:

<b>Issue</b>	<b>LBE response</b>
Planters placed too close to dropped kerbs.	The planters were not originally blocking any access to dropped kerbs, but some may have been moved. The Council will ensure that the placement of planters is incorporated into the regular vandalism checks.
Access for Emergency Services.	Officers meet with representatives from the emergency services regularly. Where requests have been made to replace bollards with cameras, this has been done immediately.
Issues with vandalism.	Replacing bollards with cameras should reduce vandalism and help maintain the integrity of the trial.
Lack of prior consultation.	See section 2.4
Use “open to pedestrians and cyclists” signs on planters.	These have been ordered and will be implemented before Christmas 2020
<p>Better communications needed:</p> <ul style="list-style-type: none"> <li>• Use of social media</li> <li>• Better information on the website</li> <li>• Success criteria</li> </ul>	<p>The communications team is limited in terms of capacity even in a business as usual scenario. Limited resources within the wider communications team available to support active travel comms have been deployed to support the implementation and significant amount of ongoing work associated with LTN’s and this requirement is expected to continue.</p> <ul style="list-style-type: none"> <li>• Comms are very happy to consider what additional social media activity can be undertaken to promote cycling/active travel initiatives that are available.</li> <li>• Web content is devolved to services but Comms are happy to work with the service to review the structure of its pages and help develop web content and identify any gaps in content.</li> <li>• It will be a combination of traffic impacts, walking and cycling impacts, non-transport impacts such as air quality and feedback from residents (via the Experimental Traffic Order consultation and a</li> </ul>

<ul style="list-style-type: none"> <li>• Data on impacts</li> <li>• Better promotion of walking and cycling</li> </ul>	<p>second qualitative survey being worked and expected to take place around 4 to 5 months into the ETO process). The final decision will be made by cabinet, but local Ward Members will be involved in the decision and all reports will be made public.</p> <ul style="list-style-type: none"> <li>• This interim assessment is the first opportunity to collate data on the impacts. It is also expected that the schemes would take some time to “bed in”, therefore, real time data isn’t possible. All data collected will be published.</li> <li>• There was no funding available for additional walking and cycling measures as TfL funding for everything except COVID emergency schemes was suspended. Under the November 2020 settlement, however, funding has resumed, and promotion can now commence.</li> </ul>
<p>Impacts on boundary roads: specifically, on making both congestion and air quality worse.</p>	<p>The Council has stated that it expects boundary road traffic to reduce as the scheme beds in, if the pattern follows that monitored in Waltham Forest, which was the first Borough in London to implement LTNs.</p>
<p>No “prior data” collected.</p>	<p>The Council has managed to obtain traffic data for both boundary road and within LTNs from before COVID and prior to the installation of the LTNs. Whilst it is not exhaustive it will allow some comparisons.</p> <p>There are also several permanent air quality sites near many of the LTNs which will be used for before and after comparisons.</p>
<p>“Divides community into two”.</p>	<p>LTNs do not “divide communities in two”. They may prevent car journeys from one side to the other, but these journeys are easily walkable or cyclable. Vehicle access is also maintained to all properties within the LTN.</p>
<p>Longer journeys and journey times.</p>	<p>The Council’s policy, as stated in the Transport Strategy, is to shift the mode</p>

	of travel from the car to walking and cycling for appropriate (particularly short) journeys. Access is however, maintained for motor vehicles to every property within the LTN.
Impacts on businesses and deliveries.	Vehicle access is maintained to all properties within the LTN. A cargo bike delivery service has also commenced in West Ealing and many local businesses have successfully utilised this service.
The public realm and infrastructure for walking and cycling needs significant improvement.	Noted and agreed. If schemes are made permanent, then further investment will be required to make the areas even more suitable and safe. The Council is exploring funding opportunities for this.

Specific issues raised for each LTN by ward members during the interim assessment engagement were:

<b>Issue</b>	<b>LBE response</b>
<b>LTN 48 – Adrienne Ave</b>	
With the filter in its current location, there is no direct access between the trading estate and Ruislip Road so using other residential roads with concern about parked cars.	Moving the filter one street south (to just north of Kenilworth) would re-open access between the trading estate and Ruislip Road. But would require a second filter to avoid re-opening the cut through.
<b>LTN 8 – Olive Road</b>	
westbound queue on Popes Lane has got worse (congestion).	The Council should explore if there are any specific measures that might reduce queuing at the Popes Lane/South Ealing Road junction. This would not, however, be funded by the LSP programme and would require TfL's assistance.
Speeding within LTN.	The Council does not currently have traffic speed data. This will be reported in the final report for each LTN. It is noted that some have reported the opposite that vehicle speeds have reduced.
Issues with vehicles ignoring no entries.	The Council will look at additional enforcement at these locations.
<b>LTN 32 Junction Road</b>	
Traffic seeking to avoid the South Ealing Road/Pope's Lane/Little Ealing Road lights is now focused on Lawrence Road and Radbourne Avenue.	This is an unintended consequence that needs a full review and potential additional measures.

Traffic seeking to avoid the Windmill Road/Northfield Ave/Little Ealing Road lights is now focused on Ealing Park Gardens.	This is an unintended consequence that needs a full review and potential additional measures.
<b>LTN 21 – West Ealing South</b>	
Speeding within LTN.	The Council does not currently have traffic speed data. This will be reported in the final report for each LTN. It is noted that some have reported the opposite that vehicle speeds have reduced.
Anti-social behaviour.	This will be reported in the final report for each LTN.
Loading issue around Foresters Arms.	Loading arrangements in this vicinity will be reviewed.
<b>LTN 25 -Acton Central</b>	
Existing gate keeps getting unlocked.	Look to replace gate with camera to reduce vandalism.
<b>LTN 20 – West Ealing North</b>	
The LTN created an issue for traffic going from Drayton Road to the Uxbridge Road (westbound) is banned from turning right at the Lido junction. The LTN exacerbates this.	This is an unintended consequence that needs a full review and potential additional measures.
<b>LTN 30 – Loveday Road</b>	
High levels of contravention due to lack of enforcement.	Enforcement to go live on 7 <sup>th</sup> December 2020.

### 3.4 Changes implemented to date

- At the request of the London Ambulance service 8 bollards were replaced with ANPR cameras.
- Additional infrastructure was placed to prevent some cars from mounting the pavement to circumnavigate the road closures.
- “Road open to cyclists and pedestrians” signage is in the process of being installed.

### 3.5 Proposed Changes to LTNs

As a result of the feedback received regarding the operation and design of the LTNs, officers are recommending that Cabinet consider the following changes:

- To address feedback and provide reassurance to residents regarding access by the emergency services, there will be a programme of replacing bollards with camera enforcement.
- The location of the barriers for the Adrienne Road LTN should be moved to allow access for larger vehicles to the trading estate, whilst maintaining the principle of the LTN. This will require a modification to the ETO for LTN 48.

- To carry out traffic surveys within LTN 20 (West Ealing North) and re-consider the design
- To review and consult on proposals to eliminate the cut-through at Lawrence Road and Ealing Park Gardens.
- A review of all the advanced warning signage should be undertaken, plus signage and road markings at diagonal closures
- An exemption for blue badge holders within the LTN that they live (subject to registration) from camera enforcement, to enable them to drive through their LTN road closures. This will require a modification to all the ETOs affected.
- An exemption for Council authorised vehicles transporting people with a mobility impairment where there is camera enforcement. This will require a modification to all the ETOs affected.

It is expected that most of these changes should be completed by February 2020.

### **3.6 The Effect of Proposed Changes**

If Cabinet approves the proposed changes to LTNs outlined in section 3.5 above, it should be noted that some of the changes will require a modification to the ETOs. The effect will be to re-set the 6-month objection period. This may be considered inappropriate by some residents.

In addition, it is considered appropriate to review whether or not the Council should issue new ETOs instead to replace the existing ETOs. A delegation is sought for the Director of Place Delivery to make the final decision once detailed consideration has been given to the implications.

## **4. Financial Implications**

It is estimated that the cost of the proposed changes in section 3.5 above will be in the region of £140k, as shown in the table below. The funding (and the conditions for spending/implementing schemes) for the LTNs come from central Government via TfL.

The total amount of funding received by the Council for LTNs was £133k for all the schemes to be implemented. This should cover design and implementation costs, staff costs and monitoring. However, due to a large level of vandalism, particularly in LTN 21 (West Ealing) and the additional monitoring required, the budget has proven to be inadequate. The total cost of the vandalism is estimated at £30k<sup>4</sup>. Where cameras replaced the bollards, an additional cost of £58k was borne, plus some cameras were moved from other enforcement locations.

However, the Council can use additional grant funding including further funding for COVID transport measures and the Local Implementation Plan (LIP), which were announced by TfL in November 2020 to cover these additional costs. Any changes arising to the design or operation of the LTNs as a result of this Interim Assessment

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<sup>4</sup> Figure correct at the time of writing on 24<sup>th</sup> October 2020

will also be covered by these other grant funds. Therefore, no further funding is requested.

<b>Additional Measures</b>	<b>Total Cost £m</b>
<b>Original Costs of Scheme</b>	
Camera for Enforcement x 6 @ £20K each	£0.120
Surveys	£0.010
Minor Works, signage and road marking	£0.010
<b>Total Cost</b>	<b>£0.140</b>
<b>Additional Costs of Scheme</b>	
Cost of Vandalism	£0.030
Replacement of cameras instead of bollards	£0.058
<b>Total Cost</b>	<b>£0.088</b>
<b>Revised Total Cost</b>	<b>£0.228</b>
<b>Funded By</b>	<b>Total Funding £m</b>
<b>TFL/LSP Grant</b>	<b>(£0.133)</b>
<b>LIP</b>	<b>(£0.095)</b>
<b>Total Grant</b>	<b>(£0.228)</b>

## 5. Legal

The Highways Act 1980 places a duty on highway authorities to maintain the highway asset or network and a Code of Practice for Maintenance Management (Delivering Best Value in Highway Maintenance) gives information about the standards to be achieved. There are various Audit Commission Performance Indicators that give monitoring information of highway conditions.

The Highways Act 1980 also places a duty on highways authorities to improve highway safety, and the Greater London Authority Act 1999 requires authorities to implement projects and programmes that contribute to the Mayor's Transport Strategy. The Road Traffic Regulation Act 1984 (the 1984 Act) and the Traffic Management Act 2004 (the 2004 Act) give powers and duties on the Public Highway to manage traffic (including pedestrians and cycles) to secure that safe and expeditious movement of traffic. Under the 2004 Act, TfL has the power to approve or reject changes on Uxbridge Road that impact on capacity and buses.

By virtue of section 122 of the 1984 Act the Council must exercise functions under 1984 Act '(so far as practicable...) 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...' and having regards to matters including the desirability of securing and maintaining reasonable access to premises and the effect on the amenities of any locality affected and any other matter appearing to the Council to be relevant.

Emergency legislation came into force on 23 May 2020 to amend, temporarily, the:

- The Road Traffic (Temporary Restrictions) Procedure Regulations 1992
- The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (the 1996 Regulations)
- The Secretary of State's Traffic Order (Procedure) (England and Wales) Regulations 1990

The Council has the power to make Experimental Traffic Orders under section 9 of the 1984 Act. The procedural requirements are set out in Regulations 22 and 23 and Schedule 5 to the 1996 Regulations.

An experimental order can only stay in force for a maximum of 18 months while the effects are monitored and assessed (and changes made as necessary as outlined below) before a decision is made whether or not to continue the ETO on a permanent basis.

The ETOs made to create the LTNs expressly provide for the suspension or modification (while the order is in force) of any provision previously made or provisions that could have been made under section 10 of the 1984 Act. The orders also contain a provision confirming that the Council's Head of Highways or anyone authorised by him may, if it appears to him or that other person 'essential in the interests of the expeditious, convenient and safe movement of traffic, or in the interests of providing suitable and adequate on-street parking facilities, or for preserving or improving the amenities of the area through which any road affected by [the relevant order] runs' modify or suspend any provision of this Order.

Any modification does not extend to making additions to the order or designating additional on-street parking for which charges are made.

The powers in section 10(2) are only to be exercised after consulting the appropriate chief officer of police and giving public notice.

## **6. Value for Money**

There are no value for money implications resulting from this Interim Assessment of the LTNs. Value for money implications for the design and implementation of the COVID transport measures were set out in the June 2020 Cabinet Report.

## **7. Sustainability Impact Appraisal**

There are no sustainability implications resulting from this Interim Assessment of the LTNs. Sustainability implications for the design and implementation of the COVID transport measures were set out in the June 2020 Cabinet Report.

## **8. Risk Management**

There are no risk implications resulting from this Interim Assessment of the LTNs. Risk management implications for the design and implementation of the COVID transport measures were set out in the June 2020 Cabinet Report.

## **9. Community Safety**

There are no community safety implications resulting from this Interim Assessment of the LTNs. Community safety implications for the design and implementation of the COVID transport measures were set out in the June 2020 Cabinet Report.

## **10. Links to the 3 Key Priorities for the Borough**

The interventions proposed fulfil Ealing Council's key priorities:

### *Opportunities and living incomes*

The programme will help deliver better active travel provision during a period when public transport is much less of an option. The measures will support the creation of safe town centres and public spaces and therefore encourage people to visit and use the businesses in their local area.

### *A healthy and a great place*

As part of all standard transport schemes the Council will ensure that road safety issues are investigated and addressed. Traffic will be managed by supporting and promoting sustainable modes. This will manage emissions of carbon and other pollutants, assisting with the Council's response to the climate emergency. Transport links throughout the borough will be targeted for improvement, particularly sustainable modes (walking, cycling and public transport) and orbital journeys between areas of Outer London, including key employment hubs.

## **11. Equalities, Human Rights and Community Cohesion**

As confirmed in the June Cabinet report, the public sector equality duty applies to the making of ETOs as well as permanent traffic orders. The needs of those with protected characteristics including the needs of disabled people are an integral part of the design and assessment process when making and reviewing ETOs. None of the ETOs have made changes to any disabled parking bays and the original design assessment did not identify any specific additional accessibility issues for the disabled over and above the restrictions on vehicular access which affect vehicle traffic generally.

The council relied in its decision making on the EAA for the Local Implementation Plan (LIP), which is the statutory Transport Strategy for the Council, to assess any equalities impacts. The EAA relied upon for the LTNs scheme has been informed and updated by the feedback and a further draft was published on 23 October 2020. This EAA shall continue to be kept under development as the schemes progress and

to inform a future decisions with respect of each scheme. There is a link to the EAA in section 17.

The United Kingdom is a signatory to the European Convention on Human Rights (ECHR) which came into force as an international treaty in 1953. The Convention comprises a statement of rights, which signatory states guarantee, and incorporates machinery and procedures for their enforcement through the European Commission of Human Rights and the European Court of Human Rights in Strasbourg.

The provisions of the ECHR which are of most relevance to the making of ETOs and exercise of powers under the Road traffic regulation Act 1984 this context are as follows.

- Article 8 - "Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country. For the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.
- Article 1 of the First Protocol - "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions shall not, however, in any way impair the right of the state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest...."

The Human Rights Act 1998 came fully into force on 2 October 2000, incorporating the provisions of the ECHR into domestic law. Although the ECHR guarantees the right to peaceful enjoyment of property, it is clear from Article 1 of the First Protocol that the making of ETPOS which restrict traffic movement on the highway does not involve an infringement of the ECHR so long as it is done in the public interest and subject to the law laid down by statute. Similar considerations apply to Article 8.

## **12. Staffing/Workforce and Accommodation implications**

There are no staffing or accommodation implications resulting from this Interim Assessment of the LTNs. Staffing and accommodation implications for the design and implementation of the COVID transport measures were set out in the June 2020 Cabinet Report.

## **13. Property and Assets**

This report is concerned with changes to parts of the highway network in the Borough, which are a key asset of the Council.

## **14. Any other implications:**

There are no other implications of these proposals.

## **15. Consultation**

As reported in section 3 and 5 above, the LTNs used ETOs to implement them. ETOs have a statutory 6-month consultation period from the making of the order.

Stakeholders and the public were invited to respond to the Traffic Notices inbox by email or in writing to the Council. The Council purchased a licence with Commonplace to make consultation easier and more accessible to residents, and substantial engagement has taken place through this site. All comments received through all media have been reported in the appendix to this report and will be again for the final report on each LTN.

## **16. Appendices**

Appendix A – Detailed Results of the Interim Assessment Monitoring

Appendix B – Map of implemented COVID transport measures (including LTNs)

## **17. Background Information**

TfL - London Street Space Plan – interim Guidance to Boroughs – 15 May 2020:

<http://content.tfl.gov.uk/lsp-interim-borough-guidance-main-doc.pdf>

Reallocating road space in response to COVID-19: statutory guidance for local authorities:

<https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities>

Cabinet Report dated 16<sup>th</sup> June 2020 item 8:

<https://ealing.cmis.uk.com/ealing/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/6514/Committee/3/Default.aspx>

Equalities Analysis Assessment for the Local Implementation plan

[https://www.ealing.gov.uk/downloads/download/5891/local\\_implementation\\_plan\\_equalities\\_impact\\_assessment](https://www.ealing.gov.uk/downloads/download/5891/local_implementation_plan_equalities_impact_assessment)

Decision Notices and Equalities Analysis Assessment for LTNs:

<https://ealing.cmis.uk.com/ealing/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/6803/Committee/315/Default.aspx>

## Consultation

<b>Name of consultee</b>	<b>Post held</b>	<b>Date sent to consultee</b>	<b>Date response received</b>	<b>Comments appear in paragraph:</b>
<b>Internal</b>				
Tony Singh	Head of Highways	18/11/2020	23/11/2020	2, 3, 4
Lucy Taylor	Director of Growth and Sustainability	24/11/2020		
Dipti Patel	Director of Place Delivery	18/11/2020	20/11/2020	1,2,3,4,5, 17
Jackie Adams	Head of Legal (Commercial)	18/11/2020	22/11/2020	1,3, 5, 11
Russell Dyer	Assistant Director Accountancy	24/11/2020	30/11/2020	
Gary Alderson	Executive Director for Place	24/11/2020	30/11/2020	1, 2, 3,11
<b>External</b>				
N/A				

## Report History

<b>Decision type:</b>	<b>Urgency item? YES</b>
Key decision	A decision for this cannot be deferred due to the public health emergency and the short deadline conditions of the available funding.
Report no.:	Report author and contact for queries:
	Chris Cole, Transport Planning Service Manager

## **Appendix A: Data Report for the Interim Assessment**

See attached report.

## Appendix B: Map of LTNs Implemented Using LSP Funding (also includes School Streets)

