

Cabinet Member Delegated Decision

Experimental road closures in the Loughborough Junction and Myatt's Field neighbourhoods

Date of Decision 9 March 2015

Wards: Coldharbour, Vassall and Herne Hill

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Report summary

Lambeth Council is committed to working with residents to make their local neighbourhoods cleaner and greener. The council is upgrading 130 miles of roads and pavements and improving dangerous junctions. A borough-wide 20mph limit is being introduced this year and the council is taking action to make the borough the most cycle friendly in London. This report proposes the introduction of a series of road closures in the Loughborough Junction and Myatt's Field neighbourhoods on an experimental basis. The proposed road closures have been designed to improve the local environment and reduce through traffic from using the area. The improvements will facilitate the creation of a meaningful town centre in the heart of Loughborough Junction so residents can be proud of where they live. The proposed closures were subject of an informal public consultation undertaken in September/October 2014 and were supported by between 66% and 69% of respondents.

Over 3000 residents will basically be shut in.

Three sides will be closed in, Major Close, Loughborough Estate, Hertford Estate and other houses down and around Loughborough and Minet Roads.

Residents submitted a petition and due to severe time restrictions only gathered 850 written and 100 online but far more could have been presented as there was no time to go round every door of all the above properties closed in and then further afield which will be also severely affected by this proposal.

Why was it only an "informal" consultation on a proposal that will indeed affect so many residents, businesses and other agencies of all types.

66% to 69% of how many people actually affected?

The breakdown is very unclear as to actually how many in the near vicinity to these road closures were against it according to the "informal" consultation.

Closing roads will not lead to a "meaningful town centre".

There are a varied number of businesses already at Loughborough Junction. What needs improving is that all the shop fronts need to be renewed. All the pavements need repairing and if one of the traffic speed ramps was created at the top of Loughborough Road under the railway bridge this would dramatically slow vehicles passing through there. Improved traffic lights and pedestrian crossings at the lights of the Junction would also greatly improve it.

Lighting all around the junction would make a huge amount of difference and make it much safer and more attractive.

There are empty properties of which could be let out to businesses lacking in the area. People living in the nearby estates will not feel proud of being cut off from roads they would normally drive on or having such drastic restrictions on their visitors and any vehicular transport that is needed to attend their properties.

Finance summary

The proposals outlined in this report are projected to cost approximately £28,000 and will be funded from the Loughborough Junction public realm project budget. This is in the Capital Investment Programme (CIP) as project number 911625 and has a total budget of £135,000 for 2014/15.

In meetings arranged by residents with the Public Realm group a sum of £880K was mentioned as being used for this proposal.

This is the first time this sum of £28,000 has been spoken of from the Loughborough Junction realm project from a budget of £135,000.

Recommendation

To implement the following proposals under section 90A of the Highways Act 1980 and section 9 of the Road Traffic Regulation Act 1984:

- The introduction of a Pedestrian Zone except local buses and cycles on Loughborough Road between Ridgeway Road and Styles Gardens.
- The introduction of point No Entry except local buses and cycles in both directions on Barrington Road.

Recommendation

To implement the following proposals under section 90A of the Highways Act 1980 and section 9 of the Road Traffic Regulation Act 1984:

- The introduction of a Pedestrian Zone except local buses and cycles on Loughborough Road between Ridgeway Road and Styles Gardens.

A Pedestrian Zone is not required and not feasible on Loughborough Road between Ridgeway Road and Styles Road? A distance of several yards.

Buses, Police Vehicles, Fire Engines and Buses (according to this report, yet we wonder which bus will be going up this part of the road?) will still have access to Loughborough Road. This would not therefore be making this part a "Pedestrian Zone".

- The introduction of point No Entry except local buses and cycles in both directions on Barrington Road.

Traffic will gain access to Barrington Road/Loughborough Road by travelling down Barrington from the traffic lights on Coldharbour Lane and enter into St James's Crescent and go into the small estate road and round onto Barrington Road causing a dangerous rat run and increasing pollution in this area.

Traffic will also go further round St James's Crescent and out onto Angell Road. The junction of Angell Road and St James's Crescent is very narrow and again will cause a danger to the public excess pollution and huge jams as the roads are so narrow.

Loughborough Road has been very recently tarmaced and remarked with very good cycle lanes. The road is wide and straight through unlike all other roads that will then become affected by closing Loughborough Road.

- The introduction of point No Entry except cycles in both directions on Gordon Grove, Lilford Road and Calais Street.
- The introduction of a road closure except cycles on Padfield Road.
- Changes to waiting and loading restrictions on Loughborough Road.
This is the first time it has been mentioned about changes to waiting and loading restrictions on Loughborough Road.

Context

- 1.1 The Loughborough Junction public space improvement project has its roots in the Loughborough Junction Framework Plan. The Plan, which was produced by architects DSDHA for the Loughborough Junction Action Group (LJAG) and Lambeth Council, was and published in July 2013.

There appears to be nothing in the DSDHA plan published in June 2013 about Road Closures.

This is also not reflected in the minutes of meetings of the LJAG / Public Space Group to the extent of months.

- 1.2 LJAG is an independent group of people who live or work in Loughborough Junction and share the common aim of regenerating and improving the area and the lives of the people who live there. Its members work with many local organisations, such as tenants' and residents' associations and community initiatives such as Building Communities in Coldharbour and the Big Local, which are working on projects designed to empower local people, improve community cohesion and enhance neighbourhood facilities.

All the local businesses will close as their business depends a lot on Loughborough Road passing traffic and the loss of access to other roads nearby.

Businesses further afield will be affected by the costs of having to travel further to either travel into the closed off areas or where they would have driven through to other main roads they would have to take much longer routes which means time and fuel costs increasing.

1.3 The Loughborough Junction Framework Plan's development involved an extensive period of consultation and engagement across the Loughborough Junction neighbourhood and included events both north and south of Coldharbour Lane, a major road bisecting the area. Some of key findings of the consultation included:

- Loughborough Junction should be seen as a destination in its own right.
- A focus on the area immediately around the Coldharbour Lane/Loughborough Road junction will help revitalise surrounding areas.
- There is a strong sense of community but there is also a clear sense of social divide.
- The area feels neglected – pavements are broken, rubbish is dumped, the retail offer needs improvement.
- Lighting needs improving across the area.
- Mend the high street – shops and public realm need improvement.
- Encourage better use of the railway arches.
- Anti social behaviour is rife – drug dealers, beggars, prostitution.

The clear sense of social divide will increase if the present local businesses have to close down and more expensive ones move into the area.

The local estates are actually being excluded from the area. The meaningful Town Centre would not be representative of the diversity in the surrounding areas.

The new builds will introduce a different level of home owner and this will cause a wider divide.

It appears these are the people being targeted in this proposal and not people who have lived their entire lives in the area.

“Encourage better use of the railway arches.”

A lot of these businesses have been here paying Council Taxes etc for many years and have families they support from the profits.

Customers also depend on these services.

“Anti Social behaviour is rife”.

This will only increase having no vehicles travelling through these roads.

Loughborough Road is already used for all sorts of illegal behaviour and if traffic ceases this will give them an even greater opportunity as it will mean less disturbance and possible witnesses to crimes.

1.4 The Framework Plan was instrumental in securing the award of substantial Local Implementation Plan (LIP) capital funding to develop and deliver public realm improvements, and the area at the Coldharbour Lane/Loughborough Road junction was prioritised for design development in early 2014.

2. Proposals and reasons

- 2.1 The Council is committed to working with residents to improve the local environment and make local neighbourhoods cleaner and greener. DSDHA was retained by the Council to develop design proposals that focussed on the creation of a meaningful town centre at the heart of the Loughborough Junction neighbourhood. Working alongside the Council and LJAG, DSDHA developed ambitious plans to improve the public space at the Coldharbour Lane/Loughborough Road junction and along Loughborough Road to Wyck Gardens. The proposals involved the removal of through traffic on part of Loughborough Road in order to increase the opportunities for public space improvements and enable the creation of a meaningful town centre area not dominated by traffic. As a result of the Loughborough Road closure proposal, the Council developed complementary measures to reduce through traffic in wider Loughborough Junction and Myatt's Field areas by proposing a number of additional road closures.

The wording of this is very misleading. There was never a mention in the beginning of the "meaningful town centre.

The area needs to look better and to have buildings repaired and shop fronts improved, lighting, paving all need upgrading.

Most Town Centre's have traffic passing through it.

Look at Brixton Town Centre as a good example.

Pollution levels have exceeded guide lines already this year.

Closing these roads is a means of "kettling" people without the use of the police.

Apart from making residents and businesses lives seriously affected in a detrimental way it will serve no other purpose, apart from having a sever impact.

This is not about a Council working with Local people.

They were not adequately or fairly consulted whether formally or informally.

Thousands were not consulted who live and work in the "kettled" area.

Coldharbour Lane will become even more congested closing these Roads.

This is an important road due to Kings College Hospital leading off of it which is just along from the closed roads. Also the first open one, Denmark Road where so much closed off traffic will then be forced to use and pour out onto Coldharbour Lane.

It is quite clear that the proposals have not even considered any of the routes traffic will be forced along in place of using the closed roads and the impact on the lives of drivers and the people living, walking and cycling on those smaller side roads.

- 2.2 During the summer of 2014, the Council worked closely with DSDHA and LJAG to develop a set of the proposals that could be taken to public consultation. The Council's Cycle Programme Manager provided useful input in to the proposed closure locations and was able to link in evolving proposals for a Cycle Quietway connecting green spaces within the wider project area.

- 2.3 Concept designs, a visualisation and an accompanying narrative were prepared and the scheme was branded the Loughborough Junction Public Space Improvement and Area Wide Traffic Reduction Project. The project proposed the following measures:
- The closure of Loughborough Road except cycles in front of Wyck Gardens at point just north of Ridgeway Road to facilitate public space improvements on the section of Loughborough Road between Wyck Gardens and Coldharbour Lane.
 - Associated pedestrian and cycle related improvements to the Coldharbour Lane/Loughborough Road/Hinton Road junction.
 - A point closure of Barrington Road except buses and cycles.

The Maps used to display the closures and quiet route were incorrect.
As an example Angell Town an Estate over 400 properties was displayed on the Map as Max Roach Park.

First bullet point states "except cycles" yet in the Recommendation section it clearly states "local buses and cycles"

Again this is all quite misleading and not at all accurately detailed.
What can be created in a small road space where fast moving traffic will still pass through it ie Police, Ambulances etc?

- 2.4 The consultation on the proposal which took place from 21 September to 31 October 2014 was launched at a Car Free Day event during which Loughborough Road closed to motor traffic on a Sunday afternoon.

On the Car Free Day a fire broke out in a block of flats on Barrington Road and the Fire Brigade had problems reaching the property.
When Coldharbour Lane was partly closed due to a pipe work problem a large traffic jam was caused in Barrington Road. Residents had a lot of problems accessing their homes.

2.5 As part of the consultation people were able to view the proposals and complete a questionnaire at a drop-in exhibition or at a series of “meet the design team” events or on-line at www.lambeth.gov.uk/lj. 633 people completed the questionnaire and some of the key findings from the public consultation are:

- The three most commonly used words to describe the section of Loughborough Road between Coldharbour Lane and Wyck Gardens are: busy, dangerous and dirty.
- 72% supported the overall concept design for improving the junction of Loughborough Road and Coldharbour Lane. 68% supported a six month experimental closure on Loughborough Road.
- 66% supported six month experimental closures on Barrington Road, Lilford Road, Gordon Grove, Calais Street and Padfield Road.
- 52% supported the re-routeing of the P5 bus route along Barrington Road.
- 81% supported the Quietway cycle route.

More details on the public consultation are contained in section 5 below and in the full consultation report and appendices document and is available on-line at www.lambeth.gov.uk/lj

Over 10 thousand leaflets were allegedly sent out but most residents asked reported they had received nothing and none of the local businesses had been told anything of the Proposal.

People reported there was a severe lack of the consultation forms at the Community Centre. There were 3 meetings which residents had to invite LJAG and the Public Realm group to attend to speak about the Proposals.

The majority of people attending them made it very clear they were against the Proposal. None of these facts have it seems been taken into consideration including the Petition presented to Full Council of 750 signatures, the 100 online and also individual organisations and residents letters stating they are against this proposal.

The consultation form was written in a very leading way forced respondents to appear to be in favour of the overall proposal.

It began with 3 questions that a lot of people without English as their first language would find very difficult to understand and therefore respond to.

There was no outline of the proposal on the consultation form.

“68% of 633 supported a 6 month experimental closure on Loughborough Road”

The word “experimental” has very recently been used to describe the Proposal and it seems certain aspects of the law pertaining to this proposal can be circumvented if this word is applied. It seems all sorts of changes have been made throughout this process to try and make sure this Proposal can go ahead.

Again this is all very misleading as the consultation did not state it was “informal” or that this was “experimental”. Neither did the submitted original Plan contain Road Closures.

The majority of people do not understand the extent of the area that will be affected and how it will impact on every one of their lives as everyone will at some point receive some form or another of a vehicle visiting their home.

“Three most commonly used words to describe the section of Loughborough Road between Coldharbour Lane and Wyck Gardens was busy, dangerous and dirty.”

Many town centres can be easily described the same way.

That does not mean that roads should be closed.

- 2.6 The Council received two petitions against the road closure proposals. An online petition via change.org petition was signed by one hundred people. A paper based petition submitted by the Loughborough Estate Tenants' and Residents' Association was signed by over 750 people and presented to Full Council by a ward councillor, Councillor Rachel Heywood. The Council's formal response to the petition was sent by the Strategic Director of Delivery and is re-produced in full in the consultation report.

The response from George Wright of Lambeth appears to be a stock reply, regarding the petitions presented to Full Council by Cllr Rachel Heywood of 750 signatures gathered by the Stop Loughborough Road Closure group, against the proposal and the Online petition of 100 signatures did not appear as if they were being included with the questionnaire by Lambeth.

- 2.7 The Council received several written representations from residents, businesses and local amenity group The Brixton Society. There was both support for and objection to the proposals. Whilst the Brixton Society welcomed the proposed cycle Quietway, it objected to the wider package that it described as “fundamentally flawed”. Details of the written representations set out in the consultation report.

Written representations from residents, businesses and The Brixton Society were and are mostly against this proposal and they gave concise clear reasons as to why. These have not been included with this report and would have served again to emphasise the fact the majority of people working and living in and around this proposal are against it.

- 2.8 Council officers met with some business owners on site and in response to their concerns the proposed closure locations on Gordon Grove and Lilford Road have been revised.

However they move the actual place of the road closure still locks off a huge area and renders all local businesses losing customers which will lead to their closure. Other businesses will not be able to prosper in place of them as they will have the same problems.

- 2.9 It is recommended that the project is progressed by the introduction of an experimental Traffic Management Order (TMO) for a six month period to stop through traffic on the following roads:

Loughborough Road in front of Wyck Gardens at point just north of Ridgeway Road and just south of Styles Gardens. Proposed closure method: Pedestrian Zone except local buses and cycles.

Barrington Road at a point just east of St James's Crescent. Proposed closure method: Point No Entry in both directions except local buses and cycles.

Lilford Road at its junction with Flaxman Road. Proposed closure method: Point No Entry in both directions except cycles.

Gordon Grove at its junction with Flaxman Road. Proposed closure method: Point No Entry in both directions except cycles..

Calais Street just north of its junction with Cormont Road. Proposed closure method: Point No Entry in both directions except cycles

Padfield Road south of its junction with Southwell Road. Proposed closure method: Barriers to close the road to motor vehicles.

It is quite clear that if Lambeth consider traffic a problem in these roads and the Public Realm Space and LJAG want the area between Ridgeway Road and Styles Gardens on Loughborough Road for a Pedestrian Zone then the proposal is not “experimental” but is a permanent proposal.

- 2.10 A comprehensive set of “before” traffic counts have been taken on streets across the project area and a further set of counts at similar locations will take place in sometime between months 3-6 of the experimental closures. It is also proposed that before and after pollution monitoring is undertaken within the project area; the Council is working with King's College London to agree sites and methodology.
- 2.11 During the experimental period, all of the roads (except Padfield Road) could be used by the emergency services and, if necessary, a temporary traffic order could be made to suspend the restrictions should any of the roads be needed for use as a temporary diversion route if Coldharbour Lane had to be closed.

Finance

- 3.1 The proposals outlined in this report are projected to cost approximately £28,000 and will be funded through the Loughborough Junction public realm project budget. This is on the Capital Investment Programme (CIP) as project number 911625 and has a total budget of £135,000 for 2014/15. By 31 January £40,296 had been spent on this scheme, plus the commitment of £45,000 for the raised crossing at Coldharbour Lane , meaning

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“Comprehensive” again another misleading word.
A set of “before” traffic counts.

Only a few weeks ago traffic counters were placed on surrounding roads and have since been removed

When asked at each of the meetings what traffic data did Lambeth have they had nothing.

In fact George Wright even argued with residents that there was only one lane of traffic on Coldharbour Lane from Camberwell Green, which therefore caused traffic to have problems heading to Brixton where vehicles were turning right to go down Loughborough Road.

There are in fact 2 lanes at the Junction, one has a filter on the traffic lights for traffic wishing to turn right to go down Loughborough Road. Therefore there are no problems for traffic heading to Brixton on Coldharbour Lane.

Road closure positions have been changed several times and the actual reason for the proposal has also changed on several occasions.

The blatant lack of understanding and knowledge of the roads and no road usage data by the traffic of an Officer of Lambeth Council who is heading a road closures proposal shows how flawed this proposal has to be and is.

It is quite clear that there is no care or consideration of the serious impact on the lives of the residents and businesses and all the people/companies/agencies using vehicles needing access in and out of the proposed areas of closure.

- 2.11 During the experimental period, all of the roads (except Padfield Road) could be used by the emergency services and, if necessary, a temporary traffic order could be made to suspend the restrictions should any of the roads be needed for use as a temporary diversion route if Coldharbour Lane had to be closed.

Finance

- 3.1 The proposals outlined in this report are projected to cost approximately £28,000 and will be funded through the Loughborough Junction public realm project budget. This is on the Capital Investment Programme (CIP) as project number 911625 and has a total budget of £135,000 for 2014/15. By 31 January £40,296 had been spent on this scheme, plus the commitment of £45,000 for the raised crossing at Coldharbour Lane , meaning

that the expected cost of £28,000 can easily be met from the remainder of the £135,000. There are no material revenue funding implications.

4. Legal and Democracy

- 4.1 This report proposes the making of an Experimental Traffic Management Order pursuant to Section 9 of the Road Traffic Regulation Act 1984, which provides as relevant:

9 Experimental traffic orders

(1) The traffic authority for a road may, for the purposes of carrying out an experimental scheme of traffic control, make an order under this section (referred to in this Act as an “experimental traffic order”) making any such provision—

(b) as respects a road in Greater London, as may be made by an order under section 6, 45, 46, 49, [or 83(2) or by virtue of section 84(1)(a)] of this Act.]

The Order making process is detailed in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (the Regulations). There are specific rules for experimental Orders and these are specified at Regulations 22 and 23 of the 1996 Regulations. The provisions of regulations 7 (publication of proposals) and 8 (objections) do not apply to an experimental Order. The procedure in summary is as follows:

An experimental scheme may be introduced after the experimental Order has been made and at least one week after a statutory “notice of making” has been published.

An experimental Order may remain in force for up to a maximum of 18 months (subject to an extension being granted by the Secretary of State).

The Council may make an experimental scheme permanent by making a permanent Traffic Management Order before the end of the 18 month period or within any extended period granted by the Secretary of State.

- 4.2 Members of the public and other representative bodies may object to the scheme before the permanent Order is made, and the objection period is the first 6 months starting from the date when the experimental Order comes into force. Any objections or representations received in that period must be considered by the local authority in the same way that objections or representations to a permanent Traffic Management Order would be.

The experimental scheme may be modified within the first twelve months of the experiment, but in such a case the 6 month objection period will commence afresh from the date of the modification.

- 4.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under the RTRA 1984 so as 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. These powers must be exercised so far as practicable having regard to the following matters:-

4.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under the RTRA 1984 so as 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. These powers must be exercised so far as practicable having regard to the following matters:-

- (a) the desirability of securing and maintaining reasonable access to premises.
- (b) the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
- (c) the national air quality strategy.
- (d) facilitating the passage of public service vehicles and securing the safety and convenience of their passengers.
- (e) any other matters appearing to the Council to be relevant

Sections 6 and 45 (and thus Section 9) of the RTRA, enable the Council to implement the proposed changes to parking, waiting and loading arrangements in those streets to which this report refers. Once the experimental Order is in place, the council is required to make the necessary amendments to the road markings and signage as soon as practicable to adequately provide information as to the Order that is in place in the area.

Due regard has not been exercised as is quite clear from the many objections. The consultation was not conducted in a fair and equal manner as so many have not been consulted in particular those who will be affected the most.

As already stated no regard has been shown to the serious impact to thousands of residents and businesses.

There are most certainly other means to have a less disproportionate impact.

The Council and LJAG could meet with business and resident group reps to find more reasonable ways to make positive changes and improve the areas proposed.

4.4 The history and outcome of non-statutory consultation undertaken to date is detailed at Paragraph 5 of this report. The following principles of consultation were set out in a recent High Court case. First, a consultation had to be at a time when proposals were still at a formative stage. Second, the proposer had to give sufficient reasons for any proposal to permit of intelligent consideration and response. Third, adequate time had to be given for consideration and response, and finally, the product of consultation had to be conscientiously taken into account in finalising any statutory proposals. The process of consultation had to be effective and looked at as a whole it had to be fair. Fairness might require consultation not only upon the preferred option, but also upon discarded options. The Regulations specify a statutory consultation procedure which must be followed if it is decided to make the proposed scheme permanent. The Council is obliged to take account of any representations made at that stage and any material objections received will need to be reported back to the decision maker before an Order is made. All objections received must be properly considered by the decision maker in the light of administrative law principles, Human Rights law and the relevant statutory powers.

Section 149 of the Equality Act 2010 sets out the new public sector equality duty replacing the previous duties in relation to race, sex and disability and extending the duty to all the protected characteristics i.e. race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment. The public sector equality duty requires public authorities to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity and
- Foster good relations between those who share a protected characteristic and those who do not.

Part of the duty to have “due regard” where there is disproportionate impact will be to take steps to mitigate the impact and the Council must demonstrate that this has been done, and/or justify the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.

The Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.

In addition to the above, Section 175A of the Highways Act 1980 extends a specific duty upon local authorities to have regard to the needs of the disabled and the blind in the execution of certain street works (namely the placing of lamp-posts, bollards, traffic signs, apparatus or other permanent obstructions) which may impede such persons.

The Council's constitution delegates to Directors and Assistant Directors (Delivery) the authority to consider objections received from statutory consultation as part of the Traffic Order making process, subject to a formal report setting out the objections, with clear recommendations, being submitted for approval and the power to make, amend or revoke traffic orders, following the consideration of such objections.

4.5 Statement of Reasons

Given the extent of the proposed road closures and the uncertainty about how motor traffic will be dispersed, it is considered prudent to introduce the proposed scheme by way of an Experimental Order. This will ensure that the council has the power to cease or modify the operation of the scheme as quickly as possible and that officers have sufficient data to determine the impact of the scheme and the decision make an informed basis upon which to decide whether the scheme advances on a permanent or modified basis.

- 4.6 This proposed key decision was entered in the Forward Plan on 6 February 2015 and the necessary 28 clear days notice has been given. In addition, the Council's Constitution requires the report to be published on the website for five clear days before the proposed decision is approved by the Cabinet Member. Any representations received during this period must be considered by the decision-maker before the decision is taken. A further period of five clear days - the call-in period – must then elapse before the decision is enacted. If the decision is called-in during this period, it cannot be enacted until the call-in has been considered and resolved.

5. Consultation and co-production

- 5.1 The Council carried out a public consultation exercise between 21 September and 31 October 2014. Consultation included:

- five public events which enabled residents and businesses to meet the design team; some of the public events were attended by more than 50 people.
- an exhibition of the proposals in the Loughborough Centre that was open three days per week for duration of the consultation period.
- Leaflets advertising the consultation were distributed to 10991 addresses within the consultation area.

The public meetings only took place because residents and businesses found out half way through the consultation period of the road closure proposal and requested each of the 3 meetings with the Public Realm and LJAG group.

Over 90% of people attending were against the proposal and strongly voiced their opinions and concerns. They clearly explained the dire consequences of the impact on them and others needing access to these roads and what will happen to all smaller roads after any closures should the decision be to go ahead with the proposal.

At each meeting it was made again very clear that leaflets were not received by the amount that was reportedly sent out and the company given the job of delivering were queried by people at each meeting.

It was agreed in one meeting that more leaflets would be sent out but this did not take place. **Again no due care of all affected.**

5.2 633 people completed the questionnaire that sought feedback on the proposals including the proposed road closures. A consultation report, published in January 2015, summarises the consultation results in detail; the feedback to the questionnaire, the individual representations and the two petitions objecting to the proposed road closures. The Council received several individual written representations from residents, businesses and the local amenity group, The Brixton Society. Some of the representations expressed support for the proposals, others objected to them.

Adding together all the results not only from the questionnaire but also the petitions and letters show the majority are against this proposal.

5.3 Whilst the Brixton Society welcomed the proposed cycle Quietway, it raised the following concerns:

- Inadequate consultation
- Conflict with existing plans
- Community safety
- Impact on bus services
- Individual road closures

5.4 The proposed experimental road closures were supported by a majority of respondents as follows:

All respondents

Scheme	Support	Did not support
Loughborough Road	69%	29%
Barrington Road, Lilford Road, Gordon Grove, Calais Street and Padfield Road,	66%	29%

For respondents with a postcode within the consultation area the results were:

Scheme	Support	Did not support
Loughborough Road	61%	37%
Barrington Road, Lilford Road, Gordon Grove, Calais Street and Padfield Road	58%	39%

5.5 Whilst a significant majority (78%) supported the aspiration of making Loughborough Road a more pedestrian and cycle friendly space, the proposed closure of Loughborough Road to motor traffic - and the associated closures of other local roads - have aroused strong feelings on both sides of the argument.

Supporters of the proposals welcome a package of proposals that will:

- create an improved public space in Loughborough Road.
- reduce fast and rat running traffic.
- reduce pollution.
- be safer for children.
- be safer for cyclists.

Opponents of the closures have expressed a variety of concerns including:

- the impact of dispersed motor traffic.
- The potential isolation of some parts of the neighbourhood The effect on businesses.
- The effect on emergency services and bus routes
- the need for a traffic assessment to establish the impact of the closures.
- the need for a Controlled Parking Zone in the area.
- inadequate public consultation.

Supporters believe rat runs and pollution will be reduced, that it will be safer for children and cyclists.

This proposal will create rat runs around very small side streets, more pollution in those same small side streets and clearly make it more dangerous for children and cyclists of those particular roads that motorists will take when they discover larger roads are closed off.

These side streets are not marked off for cycle lanes, have no pedestrian crossings and most can only allow one way traffic as residents parked both sides.

Opponents of the closures are quite right in all that they been put forward and raised concerns about.

Estates in the "kettled" in areas have a lot of works taking place and have a large amount of heavy vehicles in and out on a regular basis.

There is at present large building projects starting to take place in and around Barrington Road which again will have a vast amount of large vehicles on a daily basis.

Deliveries of all types take place throughout these areas, rubbish collection, school and hospital vehicles for disabled and vulnerable residents, carers, nurses, removal vehicles, rubbish, recycling, drain/sewer cleaning and maintenance, skips this represents a small sample of the vehicles which will need access.

Council vehicles, many services are operated using heavy machinery and vehicles.

This is only a small list of vehicle use in and out of these areas.

Public consultation material

The Council's public consultation exercise was publicised through a leaflet drop to almost 11000 properties in the consultation area, via posters in venues across the area and electronically through various social media and local networks. Large number of people attending the public meetings.

A clear majority of respondents to the consultation questionnaire supported the proposals to introduce experimental road closures on all of the proposed streets. People who completed the questionnaire were able to view the full consultation exhibition, including the public space improvements on Loughborough Road, and were therefore in a good position to make an informed decision about the package of proposals.

Emergency services access and traffic assessment

People who viewed the full exhibition were informed that the key emergency services routes would not be compromised as result of the proposed closures. The exhibition material also advised that before any closures took place a comprehensive set of speed and volume traffic counts will be undertaken in the area. This would provide the Council with a robust set of baseline information from which it can assess the impact of any closures during the experimental period. Follow up counts would then provide an accurate picture of how traffic movements changed as a result of the closures.

Access to the area and closure locations

Some people expressed concerns about the closures cutting "off the community" and affecting local businesses. Under the closures all roads within the area, as now, could be used by pedestrians and cyclists and the local P5 bus route could still follow its current route via Loughborough Road if necessary. All roads will still be accessible for motor vehicles but some journeys will take longer. A key aim of the proposal is to deter rat-running traffic from using the area.

During the public consultation, Council officers met with some local businesses to hear their concerns about the proposed closures and agreed to consider changes to the location of some closures to assist vehicle access routes. Two of the proposed closure locations (on Lilford Road and Gordon Grove) have been re-sited as a result of these meetings.

This again is misleading, Barrington Road proposal is that it becomes buses and cycles only, yet in this section it states the P5 bus could still follow it's current route.

This would therefore impact on the Pedestrian Zone at the top of Loughborough Road.

Businesses have been in the area for very many years some are long term family businesses and these have stated they will be completely out of business within 6 months if the closures go ahead.

This proposal realistically will sever the lifeline of many communities

Controlled Parking Zone

The lack of a Controlled Parking Zone (CPZ) in many of the streets within the project area was frequently raised at public meetings and within consultation feedback. The Council has made it clear that a CPZ would not be progressed as part of this project.

6. Risk management

- 6.1 The key risk would be continuing concerns about pedestrian safety if the measure was not implemented.

7. Equalities impact assessment

- 7.1 An Equalities Impact Assessment was carried out in preparing the Lambeth Transport Plan 2011 to assess equalities impacts of the Council's sustainable transport policies and projects. A socio-economic impact study to assess the impact of the trail will be commissioned.

8. Community safety implications

- 8.1 The measures will improve safety for pedestrians and cyclists

9. Organisational implications

None

9.1 Environmental implications

The proposals will deliver improvements to the public realm.

9.2 Staffing and accommodation implications

None

9.3 Procurement

The scheme will be implemented by the term contractors, Bouygues and FM Conway.

9.4 Health

Project should encourage more walking and cycling. .

10. Timetable for implementation

Element	Timescale
Consultation with statutory consultees	March 2015
Implementation	April 2015

Audit trail				
Consultation				
Name/Position	Department or Organisation	Date Sent	Date Received	Comments in para:
Sue Foster	Strategic Director, Delivery	27.2.15	27.2.15	
Carolyn Dwyer	Delivery Director, CHE	16/2/15	16/2/15	5.5
Cllr Jenny Brathwaite	Cabinet Member for Environment and Sustainability	26.2.15	27.2.15	
Cllr Donatus Anyanwu	Coldharbour ward member	20/2/15		
Cllr Rachel Heywood	Coldharbour ward member	20/2/15		
Cllr Matt Parr	Coldharbour ward member	20/2/15	22/2/15	Throughout
Cllr Jacqui Dyer	Vassall ward member	20/2/15		
Cllr Paul Gadsby	Vassall ward member	20/2/15	21/2/15	Throughout
Cllr Annie Gallop	Vassall ward member	20/2/15		
Cllr Michelle Agdomar	Herne Hill ward member	20/2/15		
Cllr Jim Dixon	Herne Hill ward member	20/2/15		
Cllr Jack Holborn	Herne Hill ward member	20/2/15	26/2/15	Throughout
Raj Mistry	Programme Director Environment	12/2/15		
Ian Baker	Delivery Lead, Highways & Enforcement	12/2/15	16/2/15	Para. 2.11
Victoria Diah	Delivery Lead, Neighbourhood Capital Programmes	12/2/15		

Mark Trevethan	Transport Manager	Policy	12/2/15		
Jean-Marc Moccarme	Governance Democracy	and	5/2/15	11/2/15	Section 3
Ian Speed	Finance		5/2/15	6/2/15	Section 4
Democratic Services			16.02.15	17.02.15	4
Report history					
Original discussion with Cabinet Member			October 2014		
Report deadline			n/a		
Date final report sent			n/a		
Report no.			n/a		
Part II Exempt from Disclosure/confidential accompanying report?			/No		
Key decision report			Yes/		
Date first appeared on forward plan			6.2.15		
Key decision reasons			Meets community impact test		
Background information			Loughborough Junction Framework Plan Consultation report		
Appendices			None		

APPROVAL BY CABINET MEMBER OR OFFICER IN ACCORDANCE WITH SCHEME OF DELEGATION

I confirm I have consulted Finance, Legal, Democratic Services and the Procurement Board and taken account of their advice and comments in completing the report for approval:

Signature _____ **Date** _____

Post George Wright gwright@lambeth.gov.uk 020 7926 0728

Senior Project Manager

I confirm I have consulted the relevant Cabinet Members, including the Leader of the Council (if required), and approve the above recommendations:

Signature _____ **Date** _____

Post Councillor Jennifer Brathwaite

CABINET MEMBER: Environment and Sustainability

Any declarations of interest (or exemptions granted):

Issue	Interest declared
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Copied below is a letter that Minet Conservation Association wrote at the time of the consultation, but this was never included in the report that was produced in January.

Minet Conservation Association

The amenity society for Myatt's Fields and the Minet Conservation Area in Lambeth

As the consultation document on Lambeth website provides very little space for comments, we have collated our views into this summary document which we would like formally entered as part of the consultation process.

The Association draws its membership from 120 households in the Myatt's Fields/Minet area.

We would like to raise our concerns about the apparent lack of consideration given to the knock-on effect that the proposed road closures as set out in the current plans for Loughborough Junction could have on other residential side streets in the area, including for residents, drivers and cyclists.

There can be no doubt that closing off a number of side streets around Myatt's Fields Park as well as Loughborough Road will result in displacement of traffic flows to other local routes. We are concerned that traffic displacement could worsen traffic on a number of roads that are already very well used by cars, including Denmark, Knatchbull and Flodden roads. This would result in very busy and polluted environments in some parts of the area covered by the proposals, and would not only worsen the situation for local residents and drivers, but also for cyclists who choose to use these roads, live there or visit the area.

Whilst we have no objections to the principle of rethinking traffic flows in the area, and support the improvement of cycling conditions, we feel very strongly that such proposals need to be comprehensively thought through and well considered before any implementation, even a trial period. A considerable increase in traffic on local residential streets for six months would be unacceptable and should be avoided.

In addition, we believe that no project should be undertaken without first having a clear idea of the present – a formal baseline against which any changes can be properly and comprehensively evaluated. At present this data is missing and we feel it has been an error to open consultation without first having the baseline as well as real clarity about the problem the scheme is seeking to address. The issue at Loughborough Junction is not the same as that of Calais Street and so the scheme cannot be set up to address distinctly different issues. As with other streets around Myatt's Fields Park, Calais Street has suffered for several years the problem of destination parking: this is the result of non-residents and commuters coming into the area to park during the working day. For this reason, local residents have been asking Lambeth for many years now to address the parking issues first. Given the lack of a baseline for the Loughborough Junction project, as well as the lack of clarity around the issue the closure of Calais Street is seeking to address, we believe that that Lambeth should carry out a formal exercise of traffic modelling now, and explain fully to

residents and road users what the impact would be on all roads in the area, including those that share a boundary with Southwark. We also believe the consultation period should be extended to allow this data to be gathered and shared with local residents before any trial can be implemented.

We believe there needs to be greater clarity from LJAG and the proposers of the scheme about the gains

it brings. It is hard to envisage the pleasant square at the junction of Loughborough Rd and Coldharbour Lane if vehicle access to Rathgar Road and Ridgway Road are retained, as the planners indicate they will be. This will mean that the only area pedestrianised will be immediately under the railway bridge which feels like a very small gain indeed. A similar issue applies to Gordon Grove. If access to the business under the arches, the scrapyard on the other side and the bins for the flats is retained, there will only be a narrow strip linking the adventure playground to Elam Gardens, which would not appear to support the impetus to improve the urban landscape.

We are also concerned about the bike route through Elam Gardens at the point where it exits onto Lilford Road. We believe that the increased traffic that will choose to use Paulet Road, and this may make this junction even more dangerous to cyclists.

Finally, we would also like to express our concern about the quality and extent of consultation for this project. Residents on many roads across the MCA area, including Flodden, Knatchbull and others, have not been leafleted. Where they have been intermittently received, the leaflets are not clear about the impact of the proposals of areas beyond Loughborough Junction. It is only through the efforts of local amenity groups and societies such as the MCA, that many local residents have been able to learn about the Loughborough Junction proposals.

We strongly urge Lambeth Council to put a stay on the trial proposed for Loughborough Junction and extend the consultation period so that:

- A baseline can be established and clearly shared and discussed with local residents

- Greater clarity about the objectives for any closures around Myatt's Fields Park can be communicated to local residents

- Comprehensive leafleting of all streets likely to be affected by the proposals can be undertaken so that the consultation can be truly representative of all those living in the area near Calais Street

- The actions agreed at the meeting at Longfield Hall on 15 October can be implemented before any road closures are trialled.

We thank you for your consideration of our comments.

Yours sincerely

Louise Gardiner-Hill

Chair, Minet Conservation Association