

<b>Item No.</b>	<b>Classification:</b> Open	<b>Date:</b> 16 February 2022	<b>Meeting Name:</b> Cabinet Member for Transport, Parks and Sport
<b>Report title:</b>		Determination of Objections – Great Suffolk Street Low Traffic Neighbourhood	
<b>Ward(s) or groups affected:</b>		Borough and Bankside, St George's	
<b>From:</b>		Head of Highways	

### RECOMMENDATION(S)

1. It is recommended that the Cabinet Member for Transport, Parks and Sport:
  - i. Considers the four representations received during statutory consultation.
  - ii. Considers the officer's response to the grounds for objections received in relation to 'TMO2122-028\_Great Suffolk Street'.
  - iii. Instructs officers to write to each person who made representations to inform them of the Council's decision.
  - iv. Instructs officers to proceed with making the necessary traffic management orders.
  - v. Instructs officers to investigate further measures to improve access to the street environment and utilise the space that was created as part of the scheme. The Council proposes to consult on these further measures in June/July 2022.

### BACKGROUND INFORMATION

2. The Great Suffolk Street Streetspace scheme consists of a one-way system installed as part of Transport for London's (TfL) Streetspace for London programme announced in May 2020. The purpose of the programme is to make it easier and safer for people to socially distance, encourage people to walk and cycle more often, avoid car use, and improve everyone's health in response to the COVID-19 emergency
3. The Council made an experimental traffic order ("ETMO") on 22 October 2020 to implement a trial for the Great Suffolk Street Streetspace

- measures.<sup>1</sup> On 23 November 2021, a decision was taken by the Cabinet Member for Transport, Parks and Sport to proceed with making these measures permanent under the proviso that further modifications may be made to allow better access to the area. These modifications would be subject to public consultation.
4. This decision was subject to the necessary statutory requirements for the making of orders as set out in the Local Authorities Traffic Order (Procedure) (England and Wales Regulations 1996) (“1996 Regulations”). The Council advertised its notification of intention to make the permanent traffic orders on 9 December 2021.
  5. The statutory consultation period ran for 28 days from 9 December 2021 until 7 January 2022.
  6. The Council gave notice of the statutory consultation in the London Gazette, local press (Southwark News), in an area-wide letter, and street notices were placed in the affected area.
  7. Notice was given to statutory consultees on 16 December 2021, which included: London Ambulance Service, London Fire Brigade, Metropolitan Police Service, TfL Buses, Freight Transport Association, and the Road Haulage Association.
  8. The Council gave notice to non-statutory consultees on 16 December 2021, which included: TfL, Southwark Disablement Association, Southwark Disability Forum, Southwark Cyclists, Living Streets and London Travel Watch.
  9. Full details of the proposals were also made available for inspection on the Council’s website or in person by appointment at 160 Tooley Street.
  10. The draft traffic orders that were advertised with the notice of intention can be found in Appendix B.
  11. Four objections to the draft traffic orders were received by the Council throughout the statutory consultation period. All were received by email.
  12. Part 3D, paragraph 23 of the Council’s Constitution sets out that the determination of objections to traffic orders is the responsibility of the Cabinet Member for Transport, Parks and Sport.
  13. The Cabinet Member for Transport, Parks and Sport is asked to consider the objections in accordance with the recommendations set out in this report.

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<sup>1</sup> [Great Suffolk Street Streetspace Scheme - Southwark Council](#)

14. The type of representations are set out in Table 1. The grounds for objection are summarised in Table 2. The officer's response to the grounds for objections can be found in Appendix A.

15. The decision to propose the implementation of the current restrictions on a permanent basis follows public and ward member consultation.

### KEY ISSUES FOR CONSIDERATION

16. The Council received four representations through the statutory consultation. All four are being regarded as objections, however one only objects to part of the scheme. These are summarised in Table 1 and are appended in full in Appendix C.

17. Some representations provided more than one ground for objection. The grounds for objection and officer's response can be found in Appendix A. The most common grounds for objection are summarised in Table 2

TABLE 1 – Type and number of representations by traffic order

Street	Object in Part	Object	Total
'TMO2122-028_Great Suffolk Street'	1	3	4

18. All representations and comments are available on file for the Cabinet Member for Transport, Parks and Sport to review.

19. Officers will respond to each representation received during statutory consultation with an acknowledgement email.

TABLE 2 – 'TMO2122-028\_Great Suffolk Street - Grounds for objection

Ref	Grounds for objection
GSS1	Increased journey times for motor vehicles to access property
GSS2	Increased traffic, pollution and congestion on main roads and through routes
GSS3	Difficulty in third party motor vehicles accessing residential building on Southwark Bridge Road building – removal vehicles, taxis
GSS4	Inconsiderate cyclists
GSS5	More attention should be paid to maintaining highways assets
GSS6	Access to Sawyer Street
GSS7	New kerbing should be a different colour to the carriageway
GSS8	Milcote Road is not suitable for additional vehicle use
<b>Recommendation</b>	Consider officer's response outlined in Appendix A and reject the grounds for objections.

20. The detailed officer's response to the grounds for objection can be found in Appendix A.
21. Officers are satisfied that the proposals do not trigger the need for a public inquiry pursuant to regulation 9 of the 1996 Regulations.
22. The Equalities Impact Assessment highlighted areas to be considered in the next stage of design previously approved by the Cabinet Member. The following will be investigated:
  - i. Whether more seating can be provided;
  - ii. Impact of displaced traffic to be further investigated;
  - iii. If footways and crossings could be improved; and
  - iv. Whether further disabled parking bays could be installed.

## **Conclusions**

23. The four representations received during the statutory consultation are summarised as:
  - TMO2122-028\_Great Suffolk Street Streetspace:  
Object – 3/ Object in part -1
24. Officers recommend that the Cabinet Member reject the grounds for objections received in relation to *TMO2122-028\_Great Suffolk Street Streetspace* following consideration of officer responses.

## **Policy implications**

25. The recommendations contained within this report are consistent with the missions of the Movement Plan 2019 (approved by Cabinet in April 2019 detailed in background documents) particularly:
  - M2 Action 2 – Create simple and clear streets
  - M3 Action 4 – Deliver infrastructure to support active travel
  - M4 Action 7 – Reduce the number of cars owned in the borough
  - M4 Action 8 – Use kerbside efficiently and promote less polluting vehicles
  - M4 Action 9 – Manage traffic to reduce the demand on our streets
  - M7 Action 15 – Reduced exposure to air pollution
  - M7 Action 16 – Zero people killed or injured on our streets by 2041

## **Community impact statement**

26. The recommendations support the Council's equalities and human rights policies and promote social inclusion and uphold the missions within the Movement Plan by creating an environment with less motor vehicle dominance, providing a better environment for walking and cycling. Car usage has been made less convenient and this will, over time, contribute

- to a decrease in car usage as it becomes a less convenient way to get around.
27. The recommendations are area based and therefore will have greatest effect upon those people living, working or traveling in the vicinity of the areas where the proposals are made.
  28. The implementation of the Great Suffolk Street Streetspace measures will benefit the local community providing safer walking and cycling routes across the area that enable active travel, reduce pollution and deter through-traffic movements.
  29. The recommendations are not considered to have a disproportionate effect on any other community or group.

### **Climate implications**

30. There is no additional impact in regards to climate impact with consideration to the recommendations in this report.
31. The decision taken on 23 November 2021 with regards to the Great Suffolk Street Streetspace scheme considered the proposed measures impact on climate change. The measures support the aims of the Council's Climate Change Strategy under Priority 2 – Active and Sustainable Travel. Key aims of the Council's Climate Change Strategy include to 'reduce car journeys to a minimum by 2030' and to 'be a borough where the walking and cycling becomes the default way to get around'. Part of meeting the borough's ambition of net zero emissions by 2030 includes a reduction in vehicle kilometres travelled and a shift to active and public transport; road transport currently accounts for 15% of the borough's emissions. These measures strongly support that ambition.
32. The data provided indicates a positive shift towards active travel modes during the trial period. Data should continue to be collected to inform the ongoing development of the scheme. As permanent measures are considered the use of additional planting, sustainable urban drainage or rain gardens on the highway is further in line with the Climate Change Strategy's Priority 3 – Thriving Natural Environment which include actions to 'create greener streets'.
33. A just and inclusive transition is at the heart of the Council's emerging climate policy. These proposals prioritise the movement of people first and foremost, while retaining vehicle access for those who require it. In delivering a safer and more equitable highway network, the measures are in accordance with the council's approach to addressing the climate emergency.

## **Equalities (including socio-economic) impact statement**

34. The Centre for Accessible Environments produced an Equality Assessment (EA), dated January 2022. The EA is included as part of this report and can be found in Appendix D, with recommendations on page 32.
35. The reduction in motor vehicles in the area as a result of the Great Suffolk Street Streetspace scheme will increase safety for pedestrians and in particular those with protected characteristics such as the elderly and disabled persons.
36. Officers are satisfied that there are no additional impacts in regards to equalities (including socio-economic) impacts in light of the recommendations in this report, save for the recommendation set out in the EA that the Council continue to engage with those groups who are car dependent because of their protected characteristic (elderly or disabled). The Council should continue to engage with these groups to mitigate any disadvantages they may suffer because of the scheme. Officers are cognisant of these groups, however on balance the benefits of the scheme outweigh the harm that these may cause. However, the Council will continue to monitor the impacts of these measures to understand how it may better assist these groups to mitigate any disadvantages.
37. Further modifications may be made to the Great Suffolk Street Streetspace scheme which will allow officers to consider interventions to create a better on street environment for those in protected groups in the next stage of design.

## **Health impact statement**

38. There is no additional impact in regards to health impact with consideration to the recommendations in this report.
39. The proposals support the Council's mission to have zero people killed or injured on our streets by 2041 by introducing traffic reduction measures.
40. The proposals support the Council's mission to use the kerbside efficiently and promote less polluting vehicles, manage traffic to reduce demand on our streets and reduce exposure to air pollution by reducing the convenience of using a car in Southwark.
41. The proposal recommends a series of one-way roads in the Great Suffolk Street area. This is likely to encourage more residents to walk or cycle to visit the area by decreasing the convenience of travelling by car. Active travel is an effective way to integrate physical activity into daily routines, and just 20 minutes of physical activity per day can reduce the risk of several

health conditions.<sup>2</sup>

42. Long-term reduction in traffic volumes will have an impact on local air pollution emissions that are particularly harmful to children, older people and those with certain health conditions.
43. It is important that the Council's Highways Department continue to monitor motorised traffic volumes on Pocock Street and the peripheral roads to ensure an air pollution 'hot spot' does not develop on these streets.
44. Traffic reduction is also an essential element of creating safe and welcoming street environments that act as public spaces, encouraging residents to spend more time on our streets and increasing social interaction. This has the potential to have a positive impact on social and mental wellbeing, by creating connected and cohesive communities.
45. According to the Urban Health Index the Great Suffolk Street area performing neutrally across the three domains of good urban health; basic human needs, foundations of wellbeing, and opportunities. Nearby areas to the north and west of the area are amongst the worst performing areas according to the Urban Health Index. The changes to the Great Suffolk Street area are part of a strategic approach to reduce traffic and increase walking and cycling across the borough.

### **Resource implications**

46. The capital cost of the traffic orders is approximately £4,500. This expenditure will be funded by Local Implementation Plan funding via Transport for London.
47. There are no resource implications associated with the recommendations contained within this report that have not been previously agreed.
48. This report is to determine statutory objections made in relation to a proposed traffic order.

### **Consultation**

49. Statutory consultation has been carried out as detailed in paragraphs 5 to 9 of this report.
50. An informal consultation was carried out for 9 weeks from 28 July to 22 September 2021. 406 responses were received regarding this consultation.
51. 406 respondents completed the online questionnaire, which is a response

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<sup>2</sup> Southwark Council. 2017. Active Travel JSNA.

rate of 8.3%. Respondents who did not live in the area heavily influenced the consultation. However, they did work in and travel through the area as predominantly taxi drivers. Focusing on residents, a combination of 55% agree or agree with modification to the scheme. 42% of residents disagree. Two of the main reasons residents are disagreeing with the scheme is that it is causing access issues. The other is that it is relocating traffic onto other roads, causing congestion, pollution and safety concerns.

52. On 23 November 2021 a decision was taken in consideration of the informal consultation responses. The scheme was to be made permanent, however further modifications were to be undertaken to allow better access to the area.

53. Additional comments were received from the Public Health team and the Climate Change team.

### **Programme timeline**

54. Notice of making – February 2022  
Implementation – February/March 2022  
Public consultation for Scheme Modifications – June/July 2022

### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

#### **Strategic Director of Law and Democracy (AGG 01/22)**

55. The ETOs were made in October 2020 under section 9 of the Road Traffic Regulation Act 1984 (“1984 Act”) and have been in operation for 15 months. The Council now wishes to make the measures permanent in accordance with the statutory procedures set out in the 1996 Regulations and the powers contained within the 1984 Act. Before permanent orders are made, the 1996 Regulations require the Council to publicly notify its intention to make the orders and carry out consultation where representations may be made over a minimum 21 day period. The Council carried out these notification and consultation requirements as described in the Background Information section of this report.

56. The Council is required to consider all objections duly made under regulation 8 of the 1996 Regulations before making an order. The Appendices to this report summarise the valid objections, and set out the officer response to the objections.

57. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary

those subject to the equality duty, which includes the Council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. Paragraphs 5 to 9 of the report detail the engagement taken place thus far to comply with the public sector equality duty.

58. The Human Rights Act 1998 imposed a duty on the Council as a public authority to apply the European Convention on Human Rights; as a result the Council must not act in a way which is incompatible with these rights. The most important rights for highway and planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). The implementation of these proposals is not anticipated to breach any of the provisions of the Human Rights Act 1998.
59. Council Assembly on 14 July 2021 approved a change to the Council's Constitution to confirm that all decisions made by the Council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered in the report at paragraphs 35 to 38 above.
60. Should the Cabinet Member be satisfied with the contents of this report then they have the power to make the decisions recommended at paragraph 1 of this report by virtue of Part 3D paragraphs 22 and 23 of the Council's Constitution.

### **Strategic Director of Finance and Governance (EL21/137)**

61. The report is requesting the Cabinet Member for Transport, Parks and Sport approves a number of recommendations detailed in paragraph 1 pertaining to the Great Suffolk Streetspace scheme.
62. The strategic director of finance and governance notes that the estimated costs associated with these recommendations are £4.5k, there is sufficient funding from existing Highways capital, and revenue budgets to support these proposals.
63. Staffing and any other costs connected with these recommendations to be contained within existing departmental revenue and capital budgets.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Great Suffolk Street Streetspace Decision report and appendices	<a href="https://modern.gov.southwark.gov.uk/mg/issueHistoryHome.aspx?IId=50027352&amp;Opt=0">https://modern.gov.southwark.gov.uk/mg/issueHistoryHome.aspx?IId=50027352&amp;Opt=0</a>	Colleen Gardner 020 7525 2665
Movement Plan 2019	Southwark Council Transport Policy 160 Tooley Street London SE1 2QH  Online: <a href="https://www.southwark.gov.uk/transport-and-roads/transport-policy">https://www.southwark.gov.uk/transport-and-roads/transport-policy</a>	Sally Crew 020 7525 5564
Climate Change Strategy, 2020	<a href="https://www.southwark.gov.uk/environment/climate-emergency">https://www.southwark.gov.uk/environment/climate-emergency</a>	Chris Page 020 7525 7259

## APPENDICES

No.	Title
Appendix A	Officer's response to Great Suffolk Street Streetspace objection themes
Appendix B	Summary of Great Suffolk Street Streetspace draft traffic orders
Appendix C	Representations in Full
Appendix D	Centre for Accessible Environment Equality response

## AUDIT TRAIL

<b>Lead Officer</b>	Head of Highways – Dale Foden	
<b>Report Author</b>	Project Manager – Colleen Gardner	
<b>Version</b>	Final	
<b>Dated</b>	1 February 2022	
<b>Key Decision?</b>	Yes	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
	<b>Officer Title</b>	<b>Comments Sought</b>
	<b>Comments Included</b>	
	Strategic Director of Law and Democracy	Yes
		Yes

Strategic Director of Finance and Governance	Yes	Yes
Director of Climate Change	Yes	Yes
Public Health team	Yes	Yes
<b>Cabinet Member</b>	Yes	No
<b>Date final report sent to Constitutional Team</b>		16 February 2022