

<b>Item No.</b>	<b>Classification:</b> Open	<b>Date:</b> 27 July 2022	<b>Decision Taker:</b> Cabinet Member for Parks, Streets and Clean Air
<b>Report title:</b>		Determination of objections - Sydenham Hill 20mph Scheme	
<b>Ward(s) or groups affected:</b>		Dulwich Wood	
<b>From:</b>		Head of Highways	

### RECOMMENDATION(S)

1. It is recommended that the Cabinet Member for Parks, Streets and Clean Air:
  - i. Considers the seven representations as summarised in Table One received during statutory consultation relating to the proposal to introduce traffic calming measures on Sydenham Hill. It should be noted that some representations provided more than one ground for objection.
  - ii. Consider and determine each objection and comment as per the table prepared by officers in Appendix A.
  - iii. Approve the amendments proposed by officers in response to the objections received as shown in Table 2.
  - iv. Instruct officers to write to each person who made representations to inform them of the Council's decision.
  - v. Instruct officers to make the necessary traffic order (TMO2223-005\_Sydenham Hill).
  - vi. Instruct officers to proceed with installation of traffic calming measures as per the Individual Decision Making report agreed on 4 May 2020.

### BACKGROUND INFORMATION

2. This report makes recommendations for the determination of a number of objections to proposed traffic orders in relation to traffic calming measures for the Sydenham Hill 20mph scheme.
3. A total of seven responses were received by email during the statutory consultation period (which ran from 12 May 2022 to 6 June 2022), as shown in Table One. The grounds for representation are summarised in Table One. Of the seven responses to the consultation, four were classed

as objections and three were classed as enquiries, comments regarding this proposal.

4. Part 3D, paragraph 23 of the Council's Constitution sets out that determination of objections to traffic orders is reserved to the Cabinet Member for Parks, Streets and Clean Air
5. The Cabinet Member for Environment, Transport and the Climate Emergency approved the Sydenham Hill 20mph scheme for implementation, as shown in the draft outline design, subject to the necessary statutory procedures on 5 May 2020. The measures proposed included:
  - i. Mandatory cycle lane on both side of Sydenham Hill from Bluebell Close to Crescent Wood Road
  - ii. Removal of central traffic islands and replacement with raised tables for crossing.
  - iii. Footway buildout at the junction with Dome Hill Park and Crescent Wood Road to provide more space for pedestrians to cross safely and encourage drivers to slow down before turning
  - iv. Introduction of a new parallel crossing for pedestrians and cyclists near to Crescent Wood Road
  - v. Converting two central island crossings into zebra crossing to allow pedestrians to cross safely
  - vi. Relocation of bus stops to discourage vehicles from overtaking buses.
6. Sydenham Hill was highlighted as one of the fastest roads in the borough in a report commissioned in 2017. It was recommended as part of the May 2020 report that traffic calming measures be implemented to reduce speeds on Sydenham Hill.
7. On 12 May 2022, in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ("1996 Regulations") the Council advertised its intention to make traffic orders to introduce the Sydenham Hill traffic calming measures.
8. The statutory consultation period ran for 21 days (with an additional 4 days to account for the Jubilee bank holiday) from 12 May 2022 to 6 June 2022.
9. Notice was given in the London Gazette, local press (Southwark News, South London Press) and street notices were placed in the affected area.

10. Notice was given to the following statutory consultees: London Ambulance Service, London Fire Brigade, Metropolitan Police Service, TfL Buses, Freight Transport Association, and the Road Haulage Association.
11. Notice was also given to non-statutory consultees including: Transport for London, Southwark Disablement Association, British Motorcyclists Federation, Southwark Disability Forum, Southwark Cyclists, Living Streets and London Travel Watch.
12. Full details of the proposal were also made available for inspection on the Council's website or in person by appointment at the Council's offices at 160 Tooley Street.

### KEY ISSUES FOR CONSIDERATION

13. A total of seven pieces of correspondence were received as a result of the statutory consultation.
14. During the statutory consultation period of the traffic order (TMO2223-005\_Sydenham Hill), four of the responses were objections to the scheme and three were comments or enquiries. Please refer to Appendix A for full details of responses received. Individual responses provide more than one reason for objections, please see below summary of objections.
15. The objections and comments are outlined in Table One.

**Table One – Summary of Representations (Some respondents included more than one comment)**

Ref	Reasons of Objection/concern	Number
1.	Insufficient road usage data has been used in the design of this scheme. A survey would reveal little or no cycle traffic along Sydenham Hill.	3
2.	Concerned about the young children crossing Sydenham Hill from the bus stop. The proposal does not reflect the real behaviour of young people. Central island protects children. The removal of the central island will endanger lives. We doubt whether the children will bother to walk back to the new zebra crossing.	2
3.	With disastrous financial impact of the pandemic followed now by the cost of living crisis, we concerned about the cost of this on Sydenham Hill.	2
4.	Safety concerns of the residents provided at the consultation event have been completely ignored.	1

Ref	Reasons of Objection/concern	Number
5.	Less safe than the current arrangement – it will provide a high speed road because of the cycle tracks along both sides. It will be an open road 6 metres wide and the speed cushion will not slow drivers who drive 30 – 40mph. It will lead to more accidents.	1
6	If a cycle lane is installed in front of our house, the Rediweld Kerb is not installed so that they could pull out of their drive carefully to merge safely with passing traffic	1
7	From observations and experience elsewhere within Southwark, improvements are likely to cause extensive and prolonged traffic disruption and heightened pollution during transition works - including on Sydenham Hill / Crystal Palace Parade and South Circular.	2
8	Additional double yellow lines will reduce parking and displace this on to side roads. The current parking along the street on both sides typically does create de-facto one-way situations that force traffic to slow and sometimes (e.g. in the face of oncoming buses) stop and wait.	1
9	The speed cameras adjacent to Woodsyre are now well established and do slow traffic westbound before the blind bend (and bus stop just beyond this bend).So why change?	1
10	Banning all parking along Sydenham Hill is not practical or fair to local residents.	1

16. Each piece of correspondence received during statutory consultation was responded to with an acknowledgement email.
17. It should be noted that some responses contained more than one reason for objection.
18. In response to the objections, please see below Table 2.

Reasons of Objections	Officer Responses
Insufficient road usage data has been used in the design of this scheme. A survey would reveal little or no cycle traffic along Sydenham Hill.	We had traffic data on Sydenham Hill which showed the average number of cyclists going to the East of Sydenham Hill is 33 while going to the West of Sydenham Hill is 60. According to the Government Walking and Cycling statistics 2020 ( <a href="https://www.gov.uk/government/statistics/walking-and-cycling-statistics-england-2020/walking-and-cycling-statistics-england-2020">https://www.gov.uk/government/statistics/walking-and-cycling-statistics-england-2020/walking-and-cycling-statistics-england-2020</a> ) , “average cycling trips increased by 26%, from 16 trips per person in 2019 to 20 in 2020. Average miles cycled per person increased by 62% between 2019 (54 miles per person) and 2020 (88 miles per person). “ According to the Statistics from Transport for London, there are significant increase in the

	<p>number of cycling particularly at weekends, with the increase of 240% over the weekend of 26-28 February 2021.</p> <p>With the provision of cycle infrastructure, it will minimise the risk of collision between cyclists and drivers. Also, building cycle infrastructure is likely to encourage people to take up cycling as well.</p>
<p>Concerned about the young children crossing Sydenham Hill from the bus stop. The proposal does not reflect the real behaviour of young people. Central island protects children. The removal of the central island will endanger lives. We doubt whether the children will bother to walk back to the new zebra crossing.</p>	<p>Next to the relocated bus stop, there will be a raised table crossing within 19 meters. Young children can also use this facility to cross the road. We have narrowed the carriageway, which will encourage drivers to drive carefully and slow down on the approach to the raised table. This will facilitate easier crossing for pedestrians. It is expected that behavior will slowly change due to the better facilities provided along the road.</p>
<p>Safety concerns of the residents provided at the consultation event have been completely ignored.</p>	<p>We reassessed the plan and replaced a bus stop bypass near Dome Hill Park with the conventional bus stop. The junction buildouts have been audited by an independent Road Safety Auditor and reassessed by doing several simulations for larger vehicle turning at the junctions.</p>
<p>With disastrous financial impact of the pandemic followed now by the cost of living crisis, we concerned about the cost of this on Sydenham Hill.</p>	<p>Funding is secured for this project as part of a 20mph programme to reduce vehicular speeds on certain roads across the borough. This funding is ring-fenced for this project. It is hoped that the scheme will improve pedestrian and cycle facilities on Sydenham Hill and encourage drivers to slow down, thus improving safety in the area.</p>
<p>Less safe than the current arrangement – it will provide a high speed road because of the cycle tracks along both sides. The proposal. It will be an open road 6 metres wide and the speed cushions will not slow drivers who travel at 30 – 40 mph. It will lead to more accidents</p>	<p>The most effective way to reduce vehicle speeds is through physical interventions. This project proposes nine raised tables, which will also form informal crossings for pedestrians as well as reducing vehicle speeds. The segregated cycle lane is designed to reduce the carriageway width along the length of Sydenham Hill. This is an effective way of reducing vehicle speeds. Following implementation, we will monitor the scheme and complete further road safety audits to ensure the measures are still safe.</p>
<p>If a cycle lane is installed in front of our house, the Rediweld Kerb is not installed</p>	<p>We've completed vehicle tracking where you live, the islands are fine where they are, but</p>

so that they could pull out of their drive carefully to merge safely with passing traffic	there is also scope to relocate it by 0.5m to the left.
From observations and experience elsewhere within Southwark, improvements are likely to cause extensive and prolonged traffic disruption and heightened pollution during transition works - including on Sydenham Hill / Crystal Palace Parade and South Circular.	If this scheme goes ahead, there will be traffic management in place to minimise disruption for road users.
Additional double yellow lines will reduce parking and displace this on to side roads. The current parking along the street on both sides typically does create de-facto one-way situations that force traffic to slow and sometimes (e.g. in the face of oncoming buses) stop and wait.	A segregated cycle lane has been proposed both to provide a safer environment for people cycling and to reduce the carriageway width to reduce vehicle speeds. The council aims to encourage people to use alternative modes of transport such as walking, cycling and public transport where possible, this means that we must provide facilities for people walking and cycling. In order to satisfy the cycle route criteria, we need to provide cycle lane separation and remove parking along the street on both sides because there is more than 1,000 motor vehicles per hour in the peak (two-way). There will not be enough space to maintain parking bay with the cycle lane.
The speed cameras adjacent to Woodsyre are now well established and do slow traffic westbound before the blind bend (and bus stop just beyond this bend). So why change?	There will be no change of the location for the speed camera. The speed cameras adjacent to Woodsyre will be retained.
Banning all parking along Sydenham Hill is not practical or fair to local residents.	The majority of residents in Southwark do not own a car, we are providing facilities for those walking, cycling and using public transport. There are still locations to park for those who need to use a car.

19. This traffic calming scheme received support at the informal public consultation stage. Full details of which can be found in the consultation summary report (Appendix B).
20. The informal consultation undertaken in early 2020 prior to the publication of the proposals to implement this scheme, yielded a 12% response rate from the 991 addresses consulted, of which the majority who responded were in favour of all of the interventions proposed as part of this scheme. This consultation included flyer drop to all addresses on this section of Sydenham Hill. Further details can be found in Appendix B. **Policy**

## **framework implications**

21. The proposals contained within this report are consistent with the Missions of the Movement Plan 2019, particularly:

M2 Action 2 – Create simple and clear streets

M3 Action 4 – Deliver infrastructure to support active travel

M3 Action 5 – Enable people to get active

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 – Reduce exposure to air pollution

M7 Action 16 – Zero people killed or injured on our streets by 2041

## **Community, equalities (including socio-economic) and health impacts**

### **Community impact statement**

22. The Council's Movement Plan has been subjected to an equalities impact assessment. The missions within the Movement Plan have been upheld in this report.
23. The recent change of Highways Code has come into force on 29 January 2022, the new rules gives priority to people walking and cycling in the Hierarchy of Road Users. The aim of the Sydenham Hill 20mph scheme is to encourage drivers to reduce speed, prioritise the road safety to road users and comfort people walking and cycling and, and this supports the Hierarchy of Road Users under the revised Highway Code.
24. The implementation of any transport project creates a range of community impacts. All transport schemes aim to improve the safety and security of vulnerable groups and support economic development by improving the overall transport system and access to it.
25. There is a risk that new restrictions cause a displacement of parking on to the peripheral network and have an adverse impact on road users and neighbouring properties. However, officers consider that the proposal has no disproportionate impact on any particular age, disability, faith or religion and ethnicity and sexual orientation.
26. The proposals support the Council's equalities and human rights policies and promote social inclusion by:
- i. Improving road safety, in particular for vulnerable road users including pedestrians and cyclists, on the public highway.
  - ii. Improving existing shared use facilities by improving road surface, tactile paving, road markings, and signage.
  - iii. Improving existing pedestrian and cycle facilities by improving delineation, tactile paving, road marking, and signage.

27. With the exception of those benefits and risks identified above, the recommendations are not considered to have a disproportionate effect on any other community or group.

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

28. The proposals are not considered to have any adverse effect on socio-economic or health equalities. Safety for pedestrians and in particular those with protected characteristics such as the elderly and disabled persons will be greatly assisted with safer crossing points and clearer locations where parking is permitted.

### **Health impact statement**

29. 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 availability of parking for those commuting into Southwark.
30. The proposals support the Council's mission to have zero people killed or injured on our streets by 2041 by introducing traffic calming.

### **Climate change implications**

31. The report has considered how 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 kms 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 by introducing traffic calming on Sydenham Hill.
32. 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.
33. Data will be collected to monitor the progression of the ongoing development of the scheme. Officers will consider the use of additional planting, sustainable urban drainage or rain gardens on the highway to ensure the scheme is further in line with the Climate Change Strategy's Priority 3 – Thriving Natural Environment which include actions to 'create greener streets'.



### **Resource implications**

34. All resource requirements will be contained within the existing highways structure.

### **Legal implications**

35. Should the Cabinet Member approve the recommendations set out at paragraph 1 of the report, the Council will make the necessary traffic orders under powers contained with the Road Traffic Regulation Act 1984 "1984 Act." and in accordance with the 1996 Regulations.

### **Financial implications**

36. The final proposal, as shown in Appendix D, has been estimated at £722,000 (Civil works is approx. £462,000 and Resurfacing works is approx. £260,000). This will be funded by existing capital budgets. Additional quotations have been sought to ensure value for money.

### **Consultation**

37. Statutory consultation has been carried out as detailed in paragraphs 8 to 12 of this report.
38. Informal consultation was also undertaken as detailed in appendix C.

### **Timescales**

39. Civil works will be expected to start in the mid of September 2022 to mid of April 2023 followed by resurfacing if it's approved.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Director of Law and Governance – (AGG 06/22)**

40. The Council wishes to implement traffic calming measures as part of the Sydenham Hill 20mph Scheme by way of traffic orders under the powers contained within section 6 and 124 of the 1984 Act and in accordance with the statutory procedures set out in the 1996 Regulations.
41. Before the traffic 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.
42. 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. Officers have considered the public sector equality duty as set out in paragraph 25 and have concluded that the proposals will have no detrimental impacts on a particular protected group under the Equality Act 2010.

43. 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 purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property).
44. This report confirms that the Sydenham Hill 20mph Scheme supports the Council's human rights policies and it is not anticipated to have an adverse effect on the human rights of any individual or group.
45. Council Assembly on 14 July approved a change to the 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 between paragraph [28] and [30] above.
46. 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 (EL22/032)**

47. The report is requesting the Cabinet Member for Parks, Streets and Clean Air to approve a number of recommendations detailed in paragraph 1 of this Objection Report pertaining to the proposal to introduce traffic calming measures on Sydenham Hill.
48. The strategic director of finance and governance notes that funding for these recommendations is to be met from the Environment and Leisure capital programme for 20 mph zones and that there are sufficient resources available to fund this proposal.
49. Staffing and any other costs connected with these recommendations to be contained within existing departmental budgets.

**Other officers**

50. Comments received from the Climate Change team.

**BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Movement Plan 2019	Southwark Council Environment and Leisure Highways 160 Tooley Street London SE1 2QH	Joanna Redshaw 020 7525 0343
<a href="http://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=6809">http://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=6809</a>		
Climate Change Strategy	Southwark Council Environment and Leisure Highways 160 Tooley Street London SE1 2QH	Chris Page 020 7525 7259
<a href="https://www.southwark.gov.uk/environment/climate-emergency?chapter=3">https://www.southwark.gov.uk/environment/climate-emergency?chapter=3</a>		

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix A	Responses received from emails redacted
Appendix B	Consultation Summary Report
Appendix C	Final Designs

**AUDIT TRAIL**

<b>Cabinet Member</b>	Cabinet Member for Parks, Streets and Clean Air	
<b>Lead Officer</b>	Dale Foden - Head of Highways	
<b>Report Author</b>	Coco Mak – Project Manager	
<b>Version</b>	1.0	
<b>Dated</b>	06/07/22	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments Included</b>
Director of Law and Governance	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
List other officers here: Policy and Research Officer (Climate Emergency)	Yes	Yes
<b>Cabinet Member</b>	Yes	No
<b>Date final report sent to Constitutional Team</b>	21 July 2022	