



Overview & Scrutiny Business Panel

Report title: Implementation of temporary measures to support safer walking and cycling in response to the COVID 19 pandemic.

Date: 14 May 2020

Key decision: Yes.

Class: Part 1.

Ward(s) affected: All

Contributors: Kevin Sheehan, Executive Director Housing, Regeneration & Environment

Outline and recommendations

This report provides the detail and background for implementation of a package of temporary transport measures in response to the COVID-19 pandemic. The primary aim is to facilitate those walking and cycling to do so safely, whilst also maintaining social distancing. As daily trips increase, these measures are becoming more urgent, and will help to support the recovery from this crisis, whilst also being in alignment with the Council's longer term policy objectives.

The Overview & Scrutiny Business Panel is asked to receive and comment as necessary, on a series of recommendations that will then form part of a separate decision report. This subsequent report will recommend that the Director of Regeneration and Place:

- Approves the package of transport measures set out in this report including:
 - I. Creating more pedestrian space in busy public places
 - II. Creating quieter residential streets for walking and cycling
 - III. Creating safer space for pedestrians/cyclists along key corridors
 - IV. Creating safer space for pedestrians/cyclists outside schools as pupil numbers increase
- Agrees to officers using their existing delegated powers, to implement these measures, as necessary, including:
 - Creating the necessary traffic orders,
 - Putting temporary parking suspensions in place,
 - Implementing signing/lining, placement of temporary barriers, demountable bollards/gates, planters and other temporary infrastructure.
 - Enforcing the traffic orders by use of camera technology
- Agrees that given the urgency of the programme, authority be delegated to the Head of Highways and Transport to make further changes/additions to the above work streams as necessary. This will be carried out in consultation with the Cabinet Member for Environment and Transport, based on evolving pressures and feedback from the community, within the limits of the funding made available by TfL or other sources that are identified.

Timeline of engagement and decision-making

There have not been any previous decisions relating to the borough's plans to implement temporary measures to support walking and cycling in response to the COVID 19 pandemic. However, all measures outlined in this report are consistent with the longer term objectives of the borough's Transport Strategy and Local Implementation Plan 2019-2041, which was agreed by Mayor & Cabinet in January 2019 (see Background Paper 1).

1. Summary

1. The purpose of this report is to provide an overview of the recommendations that will form part of a separate decision report, to be approved by the Director for Regeneration and Place. This will be for approval of the implementation of a package of temporary transport measures to support pedestrians and cyclists during the COVID 19 pandemic. The primary aim is to facilitate those walking and cycling, to do so safely whilst maintaining social distancing. As daily trips gradually increase, these measures are becoming more urgent. The package of interventions will help support the recovery from this crisis, whilst also being in alignment with a wider range of longer term policy objectives.

2. Recommendations

- 2.1 The Overview & Scrutiny Business Panel is asked to receive and comment as necessary, on a series of recommendations that will then form part of a separate decision report. This subsequent report will recommend that the Director for Regeneration and Place:
 - Approves the package of temporary transport measures set out in this report including:
 - I. Creating more pedestrian space in busy public places
 - II. Creating quieter residential streets for walking and cycling
 - III. Creating safer space for pedestrians/cyclists along key corridors
 - IV. Creating safer space for pedestrians/cyclists outside schools as pupil numbers increase
 - Agrees to officers using their existing delegated powers, to implement these measures, as necessary, including:
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or other sources that are identified.

3. Policy Context

3.1 In response to the COVID-19 pandemic, a growing number of local authorities across the UK and beyond are considering which measures to put in place to help people safely make the essential trips they need to on foot or by bicycle.

3.2 This is within the context of a range of pertinent issues, which are summarised below, with further detail provided in section 4 of the report:

- the government indicating a likely need to retain social distancing guidelines for some time;
- an observed increase in speeding/dangerous driving on the road network;
- limitations on public transport capacity if social distancing is still required;
- potential public concern over the use of public transport;
- a likelihood of increased car trips as restrictions are lifted;
- an encouragement from central and local government that journeys are kept local, and that these are made on foot or by bicycle where possible;
- A high proportion of footways that are not wide enough to safely accommodate social distancing practices
- the potential to combine trip purposes where possible to minimise exposures (e.g. physical exercise such as walking/cycling with a trip to the shops);
- a need for people to maintain good physical and mental health, increasing resilience against COVID-19 symptoms
- and a need for residents who may have been impacted financially to feel that they have viable low cost transport options available to them.

3.3 On 9th May 2020, the Secretary of State for Transport issued additional statutory guidance under Section 18 of the Traffic Management Act 2004, providing additional advice on techniques for managing roads to respond to the issues outlined above (see Background Document 2). The document sets out high-level principles to help local authorities to manage their roads and the appropriate actions they should take. The guidance also specifies that Authorities should monitor and evaluate any temporary measures that are installed, with a view to making them permanent, and embedding a long-term shift to active travel as the country moves through the recovery phase and into a newly shaped 'business as usual'.

3.4 Following the publication of this guidance, the Department for Transport (DfT) agreed a financial settlement with TfL that allows it to work with London boroughs to roll out measures contained within this guidance. TfL subsequently published separate guidance for boroughs on 15th May 2020 setting out its expectations of boroughs (see Background Document 3). This takes into account the London context and unique pressures and issues that are being experienced. The guidance sets out the pressing need to safely accommodate more walking and cycling trips as travel restrictions are relaxed, but whilst social distancing guidance remains. It explains the types of measures that will help to achieve this, which is broadly consistent with the DfT guidance. It seeks to transform London's streets by:

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- Providing temporary cycle routes to extend the strategic cycle network, with London's main roads repurposed for temporary cycle lanes and wider footways so that people can safely socially distance.
 - Providing additional space for people walking and cycling in town centres and at transport hubs, including widening of footways on local high streets to enable people to queue safely for shops which will help facilitate local economic recovery
 - Accelerating delivery of low traffic neighbourhoods and school streets by working with boroughs to reduce through traffic on residential streets, to further enable more people to walk and cycle safely as part of their daily routine
- 3.5 The measures set out in this Overview & Scrutiny report are consistent with both the DfT and TfL guidance.
- 3.6 It should be noted that TfL has withdrawn the majority of transport funding previously allocated to boroughs, with the exception of any 'sunk' costs already incurred. All remaining funding is being reallocated to boroughs who are in a position to rapidly implement temporary transport interventions in response to the issues outlined above. Further information on this is provided in the financial implications section of this report.
- 3.7 The primary objective of these measures is to protect public safety during the COVID-19 pandemic. People have already started to undertake more trips, which makes these measures increasingly urgent. This will help to support the recovery from this crisis whilst also being in alignment with a wider range of existing policy objectives.
- 3.8 The engagement undertaken to date on the Council's COVID-19 response, has demonstrated an appetite amongst communities for some of the measures that are being developed in response to the emergency to be retained on a more permanent, non-emergency basis. This would also be in line with achieving the Council's longer term policy objectives, which are set out below. As such, an evaluation of the temporary measures will be undertaken at the appropriate point in the future to help inform the development of a medium to longer term strategy. The process for this is outlined further in section 6.
- 3.9 The Council's over-arching policies can be found in the Corporate Strategy 2018-2022 (see Background Document 4). The Council's transport policy objectives can be found in the Lewisham Transport Strategy & Local Implementation Plan 2019-2041 (LIP3) and are summarised below (see Background Document 1).
- Travel by sustainable modes will be the most pleasant, reliable and attractive option for those travelling to, from and within Lewisham
 - Lewisham's streets will be safe, secure and accessible to all
 - Lewisham's streets will be healthy, clean and green with less motor traffic
 - Lewisham's transport network will support new development whilst providing for existing demand.

4. Background

- 4.1 As a result of the COVID-19 emergency, the resulting lockdown and social distancing requirements, trip patterns have changed substantially. These will continue to evolve as the government reviews the available evidence and decisions are taken on how and when to ease lockdown restrictions. As outlined in section 3.2, a number of factors are at play which have combined resulting in a need for intervention and in shaping the

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nature of the temporary mitigation package. This section of the report elaborates on these factors and provides local evidence of their importance.

- 4.2 Crucially, whilst the need for social distancing remains, any external factors that result in an increase in walking and cycling trips (which is something to be encouraged), at the same time as there being an increase in vehicular traffic or speeding (which is undesirable), is a cause for concern on safety grounds.
- 4.3 This is because people currently need more space than usual in order to maintain social distancing whilst walking/cycling. This becomes more difficult to achieve when the available space is constrained by a combination of narrow footways, shop queuing systems, parking, and high traffic volumes and/or speeds on the carriageway. Put simply, if people need to frequently step into the carriageway to maintain a 2m clearance when passing others, this puts them at increased risk without mitigation measures in place, particularly in the locations with the highest footfalls and traffic volumes/speeds.
- 4.4 Cyclists are also vulnerable, again, particularly where traffic volumes or speeds are high. This is especially relevant for newer cyclists who may not have received any formal cycle training, to give them confidence riding in busy traffic, due to the restrictions currently in place. Cyclists are also likely to need to negotiate pedestrians who will be stepping into the carriageway, and lower traffic volumes would give them greater flexibility to react quickly in this respect, without putting themselves in danger.
- 4.5 A range of interventions are proposed that therefore seek to either create more protected space for pedestrian and / or cyclists, or that aim to lower traffic volumes and speeds so there is greater scope for road users to safely share spaces.

4.6 Factor 1: Increasing traffic volumes and speeding

- 4.6.1 A predominantly car based recovery is not a viable option as the road network would not be able to accommodate the required number of trips. Nor is it desirable from a road safety, air quality, public health or economic perspective.
- 4.6.2 Evidence from TfL has shown that up to 50% higher speeds are currently being observed on many routes across London as a result of lower traffic volumes/congestion, leading to a higher risk or perception of road danger. Evidence from the Met Police has shown that although the volume of collisions has reduced, those that are taking place are likely to be more severe due to the speeds involved. More locally within Lewisham, the police have been undertaking enforcement action to help tackle speeding. The police have witnessed some occurrences of people travelling at twice the speed limit in certain areas and are issuing fines accordingly.

TfL has highlighted that reducing exposure to air pollution is important as this is thought to be associated with increased deaths from COVID-19. As set out in the Council's Air Quality Action Plan (see Background Document 5) Road transport is the biggest contributor to NOx and PM10 emissions in the borough, contributing 64% and 55% of total emissions respectively.

4.7 Factor 2: Limitations on public transport capacity and concern over its use

- 4.7.1 There are currently fewer buses and trains in service, with operators currently working to increase capacity, so that people can more easily socially distance when they do need to travel. However, TfL has indicated that it will only be able to carry around 13-15 per cent of the normal number of passengers on the Tube and bus networks even when 100% of services are operating, due to the social distancing requirements. Once more people start to return to work, social distancing at bus stops and train stations will become harder. The Council is in regular contact with TfL and the train operating companies to raise key concerns and discuss how best to enable people to socially distance, particularly as they wait for services. However, even this will not be sufficient

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to accommodate the volumes of passengers that used to travel pre-COVID-19.

- 4.7.2 Interchanges and town centres are also often on busy strategic roads. Service disruption or ‘bunching’ on the bus network can lead to high volumes of waiting passengers on the pavement at busy interchanges and longer dwell times may cause traffic disruption.
- 4.7.2 A recent YouGov poll found around 40 per cent of Londoners say they will use public transport less once lockdown measures are relaxed, with 50 per cent of those saying they will walk instead, 17 per cent saying they will cycle instead. However, 41 per cent say they plan to drive instead. TfL has indicated that if all car owning households switched their usual public transport journeys to car, some boroughs would see a near doubling in the number of private transport journeys, causing considerable congestion issues.

4.8 **Factor 3: Constrained footways**

- 4.8.1 Footways need to be at least 3 metres wide in order to maintain social distancing for two pedestrians passing one another. This works on the assumption that one person typically comfortably occupies around half a metre of space, with a 2 metre gap in between. However, recent research included within TfL’s guidance, indicates that only 36% of footways in London are at least 3 metres wide. This means that people will need to either step into the carriageway or cross the road to safely pass another person, introducing an element of road safety risk, particularly if traffic volumes are high.

4.9 **Factor 4: Promotion of walking / cycling trips**

- 4.9.1 It has been recognised in the guidance issued by government and TfL that the increased level of walking and cycling is a positive trend, which should be supported and encouraged. Indeed we are already seeing evidence of increased levels within London, as people have taken advantage of the lower traffic volumes observed at the peak of the crisis, and are seeking to maintain this. Evidence from TfL shows that 85% of people report wanting to see some of the personal and social changes they have experienced during lockdown to continue.
- 4.9.2 As a result of the constraints on public transport, TfL in particular, is encouraging as many essential trips as possible to be safely made on foot or by bicycle instead, whilst socially distancing.
- 4.9.3 Looking at pre-COVID travel patterns, there is significant potential for modal shift within Lewisham. Although it is recognised that some of these trips will no longer take place, for instance due to increased home working or online shopping. 47% of Lewisham households do not own a car and so are reliant on walking, cycling or public transport to get around. Up until the COVID pandemic only 2% of all trips made by Lewisham residents were made by cycling, but with at least 13% of residents cycling at least once per week, and 18% at least once a month. 30% of all trips were undertaken on foot, 34% by public transport and the remainder by car, motorcycle or taxi. Only 7% of the 264,200 trips in Lewisham that could be made by bicycle, were actually being made by bicycle. More than half of these potentially cyclable trips were less than 3km (about a 10 minute cycle ride).

4.10 **Factor 5: Encouragement to maintain good physical and mental health**

- 4.10.1 It has been demonstrated that those with underlying health conditions are more susceptible to severe COVID-19 symptoms. The government has highlighted the benefits of walking and cycling in improving health, and many people have been taking positive steps towards this, taking advantage of their daily exercise allowance. There is also scope to combine trip purposes – for instance walking or cycling to work or the

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shops.

4.10.2 Achieving 20 minutes of walking or cycling each day is recommended for good health and well-being, which reduces risks of diabetes and heart disease, both of which are risk factors for severe COVID-19 disease. In the 3 years to 2017/18, on average only 35% of Lewisham residents were walking or cycling for at least 10 minutes twice a day (or a single block of at least 20 minutes). Over half of the adult Lewisham population, and 37% of 10-11 year olds and 21% of 4-5 year olds are overweight or obese.

4.11 **Factor 6: A need to support the economic recovery**

4.11.1 TfL has acknowledged that encouraging people to use local shops and services, rather than travelling further afield, will be important in supporting the local economy as well as minimising congestion on the road network. Evidence shows that those who walk to a high street spend 40% more than those who drive, and that high street walking, cycling and public realm improvements can increase retail sales by up to 30%.

4.11.2 Walking and cycling are also relatively low cost options for those who may have been impacted financially by the pandemic.

5. Emergency transport measures in response to COVID-19

5.1 Project 1: Creating more pedestrian space in busy public places, at pressure points

5.1.1 Officers have identified a number of locations on high streets and at park entrances where the existing conditions mean that it is difficult for pedestrians to comply with social distancing due to limited footway widths and/or shop queuing systems, and intervention is considered necessary.

5.1.2 Measures appropriate to each location are proposed, including the use of temporary barriers to create additional pedestrian space and/or road closures where necessary to facilitate pedestrian movement.

5.1.3 The initial tranche of locations being progressed is listed below. This has been informed by information from the Council's highways team and from a list of locations submitted by a pedestrian stakeholder group known as 'Lewisham Pedestrians'. Details of the first nine locations are shown below. These will be implemented as soon as possible.

- a) **Deptford High Street** – illegal parking on the eastern side of the street is making it difficult to socially distance due to the narrow width of the remaining footway, alongside pedestrians queuing to access shops. There are also road safety issues due to pedestrians being forced to use the carriageway whilst mixing with vehicular traffic. The scheme prevents parking/loading on one side of the street, to allow more space for pedestrians to pass one another safely on this busiest stretch of the shopping parade, whilst still enabling essential vehicular access and deliveries. Planned utility works in mid-May will also close the southern end of the high street to traffic, thereby reducing traffic volumes.
- b) **Luxmore Gardens** – suspension of parking on one side of Luxmore Street, which currently has footway parking on both sides of the street, making it difficult to safely practice social distancing, given increased use of the park amongst parking and construction activity.
- c) **Coulgate Street** – Suspend parking bays to create more space for pedestrians in front of the shops
- d) **Sangley Road** – Suspend inset parking bays to create more space in front of the shops

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- e) **Foxberry Road** – Suspend loading bay to create more space in front of the shops
- f) **Dartmouth Road** – Suspend inset parking bays to create more space in front of the shops
- g) **Staplehurst Road** – Suspend a number of perpendicular parking bays to create more space in front of the shops
- h) **Hither Green Lane** – Suspend footway parking bays to create more space in front of the shops
- i) **Wells Park Road** – Remove all footway parking to create more space in front of the park

5.1.4 Any further requests will be prioritised against a set of criteria that will help assess the extent of the issue that has been raised. This includes existing footway widths, current/projected pedestrian and traffic flows, the level of queuing that needs to be accommodated to access any essential services, evidence from key stakeholders such as the police/TfL/transport service providers, and level of feedback from the Commonplace website (see paragraph 6.5.1 for further details about the Commonplace website). Consideration will then be given to how to best tackle the identified problem on a case by case basis, along with any interdependencies with other projects.

5.1.5 In addition to these measures, the Council will be erecting signage in areas of high pedestrian footfall, aimed at encouraging motorists to slow down. However, the focus is predominantly on making temporary physical improvements to the street environment.

5.2 Project 2: Creating quieter and safer residential streets for walking and cycling by introducing modal filters

5.2.1 A 'modal filter' is a road closure that stops motor vehicles, but which still allows pedestrians, cyclists (including electric cargo cycles) and powered two wheelers through. These are used to create safe routes for pedestrian and cycle use through the removal of the majority of through traffic. It should be noted that the initial tranche of 'filters' are not intended to stop every rat-run, but focus on some of the key routes. All locations will have exemptions for emergency service vehicles, and public transport services where applicable.

5.2.2 As outlined in section 4 of the report, a range of factors mean that there are increasing volumes of pedestrians, cyclists and motor vehicles on the roads. However, whilst social distancing guidelines remain in place it is difficult to safely accommodate these movements within the available space, particularly where footways are below 3 metres, and traffic volumes are higher than might be expected for a residential street that is not intended to take through traffic.

5.2.3 A rebalancing of provision therefore needs to take place in order to safely accommodate the increase in pedestrian and cycling trips, by reducing the volume of traffic. This issue becomes more pressing the greater the number of trips that take place. Without these changes, these vulnerable road users will be at risk.

5.2.4 Officers have identified an initial tranche of locations where rat running has historically been identified as an issue, and where it is feared higher volumes of traffic are likely to re-emerge. This is based on traffic data, resident complaints, and/or officer observations. The footways in these locations are also below 3m.

5.2.5 The first phase of locations will be initially introduced using planters and temporary barriers or demountable bollards, and will avoid emergency service or bus routes. A second and third tranche of locations are planned on bus or emergency service routes, for which the appropriate exemptions will need to apply for these services. These locations will not have a physical restriction in place, but will be enforced using cameras as soon as possible. There will be advanced warning signage at each

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location. Discussions with the emergency services and Council refuse teams are being held at present to understand their views on the plans and these will be given consideration as part of the decision making process.

- 5.2.6 It is recognised that emergency service response times will be of concern to residents at present. Whilst road closures may increase journey times for general traffic, it should be noted that the London Borough of Waltham Forest, who had already introduced modal filter systems in recent years, have seen a decrease in emergency service response times since their introduction. This is most likely because modal filtering tends to lead to an overall reduction in traffic volumes as more people switch to alternative modes. Blue light services also benefit from priority over other motorists.
- 5.2.7 It is also worth noting that the London Borough of Islington has received a letter of support from its local hospital requesting that a range of temporary measures, including modal filters, be implemented to help key workers get to work safely on foot or by bicycle and also in the interests of broader health and safety (see background document 6). Discussions regarding these measures will be held with Lewisham Hospital and their views given consideration as part of the decision report.
- 5.2.8 The modal filters can be relocated/removed if necessary to achieve objectives outlined in this report. Any additional requests will be prioritised against a set of criteria including (but not limited to) the volume of traffic that they have historically taken, footway widths, if they are on the strategic cycle network/desire lines, if they are near key educational/leisure or retail facilities and the level of resident support for the closure.

5.3 Project 3: Creating more space for pedestrians and cyclists along key corridors

- 5.3.1 This measure primarily seeks to increase space for cyclists, but also seeks to provide extended footway space for pedestrians. This will be achieved through the use of lining, cones or temporary barriers as seen in other cities across the world. This reallocation of space, even if not fully segregated, would give a greater sense of protection for vulnerable road users from speeding vehicles.
- 5.3.2 Many essential trips will involve at least the partial use of main roads. As outlined in section 4, evidence from TfL has shown that up to 50% higher speeds are currently being observed on many routes as a result of lower traffic volumes/congestion, leading to a higher risk or perception of road danger. Evidence from the Met Police has shown that although the volume of collisions has reduced, those that are taking place are likely to be more severe due to the speeds involved.
- 5.3.3 It should also be noted that any residents who have chosen to take up cycling during the lockdown period would not have received any recent formal training. Reducing road danger will help ease the burden on the NHS from road collisions at this critical time.
- 5.3.4 The corridors being investigated are listed below. These have been included as having being on key desire lines for cyclists, whilst also having sufficient space to accommodate pop up cycle lanes. In some instances, this may involve the suspension of parking. Consideration will also be given to changing the hours of operation of bus lanes so that they operate 24 hours a day, 7 days a week in order to give greater protection to cyclists from general traffic whilst also seeking to protect bus journey times. There is one corridor (the A21) on the Transport for London Route Network (TLRN) for which TfL are also developing a temporary scheme. Officers are working together to co-ordinate the plans.
- A21/A2209/A2210 corridor (including Deptford Church Street, Brookmill Road, Lewisham High Street, Bromley Road)
 - Lewisham Road corridor

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- Belmont Hill, Lee Terrace corridor
- Brockley Rise, Brockley Road, Shardeloes Road corridor
- Perry Hill corridor
- Southend Lane, Downham Way corridor
- Lee Road, Burnt Ash Hill, Baring Road corridor
- Ladywell Road corridor

5.3.5 In addition to the measures outlined we will be actively pursuing an increase in police enforcement in response to reports of increased speeding in the borough.

5.4 Project 4: School streets to allow social distancing outside schools when they reopen

- 5.4.1 School streets are streets or parts of streets that are closed to vehicular traffic for part of the day at school pick up and drop off, while schools are open. This will provide a safe area for children entering or leaving the school during these periods, facilitating the ability to socially distance at the school gates, where feasible. Without this measure parents and children risk having to use the carriageway in order to maintain social distancing whilst waiting, whilst avoiding with vehicular movements associated with school traffic, as well as general traffic.
- 5.4.2 There has been much speculation on when schools will start to expand provision, and how this will be executed. The latest government advice suggests that this could commence from early June 2020, and that is likely to involve a limited number of primary school year groups. However, this decision is being taken on a case by case basis by schools based on risk assessments and advice from trade unions. There is no detail yet available on whether pick up/drop off times will be amended to help manage this activity.
- 5.4.3 It is important that we are as prepared for this as possible given that schools act as a focal point for a proportion of the community at pick up and drop off times. However, it is difficult to do so without further detail from schools on timings, as this will influence both phasing and the nature of the measures.
- 5.4.4 In many cases we will need the support of schools to activate/terminate the temporary school street closures at pick up/drop off times. The use of DBS checked volunteers is also being explored. In other cases, the introduction of modal filters may be more appropriate, to help reduce traffic volumes outside schools. Schools have been contacted by the Council to share guidance from TfL, including an invite to express their interest in having a school street.
- 5.4.5 Schools will be prioritised based on a range of criteria, with highest priority given to those with footway widths below 3m, higher traffic volumes, higher pupil numbers, and school support for the programme.
- 5.4.6 Assessments will be made on the most appropriate way of introducing school streets on a case by case basis, and consideration given to interdependencies with the other projects set out in this report. Some schools, such as those on distributor routes will not be suitable for a school street, but may instead benefit from the measures outlined under Project 1 of this report.

6. Process

- 6.1 In order to introduce these new restrictions within the timescales needed during the current public health emergency, certain proposed measures require that a Temporary

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Traffic Regulation Notice (TTRN) be used to initially install these measures. This can be in place for up to 21 days and if needed, followed by either an extension to the TTRN or advertisement of a Temporary Traffic Order (TTO) which may be in place for as long as the current emergency applies, up to a maximum of 18 months. Both of these are made under the provisions of the Road Traffic Regulation Act 1984 (RTRA). Further detail on the procedures which need to be followed for TTRNs/TTOs is provided in section 7.

- 6.2 Trip patterns will continue to evolve as the government reviews the available health evidence and decisions are subsequently taken on how and when to ease lockdown restrictions. Although the government has set out a broad road map of how it intends to do this, this is subject to change which introduces an element of unpredictability to the situation which makes it difficult for Councils to plan for. Based on the currently envisaged plan there could be a relaxation of a number of restrictions from 1 June 2020, notably more pupils returning to school and shops reopening. This is likely to result in a significant increase in the number of trips being undertaken, but at this point is not certain. The Council therefore needs the flexibility to either introduce measures at short notice, or to introduce measures in advance of when they are likely to become increasingly necessary to avoid safety issues for the public as set out in this report. This makes TTRNs the preferred route for the majority of the measures listed in section 6.3 below.
- 6.3 Measures proposed as part of this package that require a TTRN/TTO to be implemented include:
- Modal filters (or road closures);
 - new yellow line parking restrictions; and
 - the introduction of new one way restrictions.
- 6.4 Some of the proposed measures do not require a TTO, although they do still require approval by a senior Council officer and a record of the reasons for their introduction. Examples of these measures include:
- the use of cones or barriers on part of the road to create additional pedestrian space;
 - temporary suspension of existing parking bays.
- 6.5 Public engagement and consultation
- 6.5.1 In parallel, a public '[Commonplace](#)' website (click to link to website) has been launched showing each package of measures and the locations of each scheme. It asks users for initial feedback on any issues, as well as inviting suggestions for further schemes. New requests will be considered against a range of criteria which will differ slightly between each programme line, as specified in section 5 of this report. It will be regularly updated with details of any new schemes that are brought forward for implementation. Users can also sign up for updates that alert them of any changes.
- 6.6 Monitoring
- 6.6.1 The measures will be kept under review and will be lifted or amended if they are not considered to be contributing at all to the policy objectives set out in this report. Traffic data, including bus journey times, will be monitored to understand how travel patterns are evolving, and when it might become necessary to review any of the locations.
- 6.6.2 Although these temporary measures are not intended to deliver permanent Healthy Neighbourhood schemes, it is recognised that there may be an appetite amongst communities for some of the measures that are being put in place on an emergency basis to be retained on a more permanent, non-emergency basis. This would be in line

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with the Council's longer term policy objectives, as noted in section 3 of this report.

- 6.6.3 Subject to future funding guidance documents from TfL, it is currently anticipated that the traffic data and public feedback gathered during the period of the TTRN/TTO could be considered in determining whether to use the Experimental Traffic Order (ETO) process under the provisions of section 9 of the RTRA to explore the viability of the long-term or permanent introduction of these and other measures. This decision would be taken under delegated authority by the Executive Director. The ETOs may be in force for up to 18 months whilst new traffic conditions are being established after the lifting of the government restrictions, forming a statutory consultation period, and during which time changes can be made to the scheme. Further data collection and consultation with residents would take place during this period to evaluate how the scheme has operated and if any of the measures should therefore be made permanent. A review would be undertaken after 6 months.
- 6.6.4 Once this has been understood, this would be given consideration in the context of the Council's Healthy Neighbourhoods programme, which could be reframed accordingly and in line with any revised TfL guidance on the use of Local Implementation Plan funding. A formal decision would be taken on this by Mayor & Cabinet. If supported, efforts would be taken to give priority to those areas that were originally identified as being in the first tranche of Healthy Neighbourhoods programme. However, other factors would also need to be considered such as the extent to which the measures have been successful in achieving the intended objectives in each area, and any revisions to TfL funding guidance.

7. Financial implications

- 7.1 The Department for Transport (DfT) has agreed a financial settlement of £45 million for TfL covering a six month period. This now allows TfL to work with London boroughs to roll out measures contained within the DfT and TfL guidance referred to in section 2 of this report.
- 7.2 TfL has withdrawn the majority of transport funding previously allocated to boroughs, with the exception of any 'sunk' costs already incurred. All remaining funding is being reallocated to boroughs who are in a position to rapidly implement temporary transport interventions in response to the issues outlined above.
- 7.3 It is challenging to provide detailed costs at this stage as there remain a number of unknown factors, for example how many school streets will be required and the feasibility of the cycling measures on key corridors. Initial cost estimates have been developed for those measures which it is possible and this has focused on the measures to create more pedestrian space in busy public places and the initial tranches of modal filters that are not on emergency routes. It should be noted that some assumptions have been made in relation to these costs, such as the duration of time that the measures will be in place, therefore they could be subject to change. The estimated cost of these measures, which includes design and implementation costs are c. £460k.
- 7.4 Officers will be submitting a funding bids to TfL that provides an overview of their proposals. TfL will be aiming to turn these applications around within a week of submission. Initial meetings with TfL have been held and the measures outlined within this report are considered to be consistent with the guidance that was issued. The extent of the measures can be easily tailored to the amount of funding that is likely to be available. The Council may be incurring expenditure prior to funding being confirmed with TfL, and so this is a risk that the Council will have to manage as these projects progress. Any expenditure that will not be funded by TfL will be a cost to the Council's General Fund that could impact on the affordability of other General Fund services.

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8. Legal implications

- 8.1 On the 9th May 2020, the Secretary of State for Transport issued additional statutory guidance under Section 18 of the Traffic Management Act 2004 (“the act”). This does not replace the original Network Management Duty Guidance published in November 2004, but provides additional advice on techniques for managing roads to deal with COVID-19 response related issues. It applies to all highway authorities in England, who shall have regard to this guidance to deliver their network management duty under the act. It is effective from the date of publication and will be reviewed three months after publication.
- 8.2 This guidance sets out high-level principles to help local authorities to manage their roads and what actions they should take. The four projects included in this decision report are specified in the guidance as being appropriate actions for local authorities to take. It also specifies that Authorities should monitor and evaluate any temporary measures they install, with a view to making them permanent, and embedding a long-term shift to active travel as we move to recovery.
- 8.3 Section 75 of the Highways Act 1980 authorises a highway authority to vary the relative widths of the carriageway and of any footway in a public highway. This includes the power to widen a footway within the existing boundary of the road. No procedure and in particular no consultation is prescribed for the use of section 75. This power will authorise any proposed amendments to footway widths under Projects 1 and 3.
- 8.4 The Road Traffic Regulation Act 1984 (RTRA) sets out the legal framework for traffic management orders. These will be required for some of the schemes undertaken as part of Projects 1-4 of this report.
- 8.5 Section 122 of the Act imposes a duty on the Council to exercise the functions conferred on them by the RTRA as (so far as practicable having regard to the matters specified in S122 (2)) to ‘secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians and the provision of suitable and adequate parking facilities on and off the highway’.
- 8.6 The matters set out in S122(2) are:-
- a) the desirability of securing and maintaining reasonable access to premises;
 - b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - c) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
 - d) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - e) any other matters appearing to the local authority to be relevant.
- 8.7 The procedures for making temporary traffic orders and the form that they should take are set out within the Road Traffic (Temporary Restrictions) Procedure Regulations 1992 (the Procedure Regulations). This includes a statutory duty to consult.
- 8.8 Section 14(1) (b) of the RTRA states that temporary traffic orders (TTOs) may be made where the traffic authority are satisfied that traffic on the road should be restricted or prohibited for reasons including the “likelihood of danger to the public”. Under this

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section, the Procedure Regulations require that an authority publish a notice of intent not less than seven days before making an order in a local newspaper and in the vicinity of the affected area and inform the police. No more than 14 days after making the order, the authority must similarly publish a notice stating that the order has been made. The maximum time limit for a temporary order is 18 months.

- 8.9 Under section 14(2) of the RTRA, the traffic authority for a road may at any time by notice (temporary traffic regulation notice or TTRN) restrict or prohibit temporarily the use of the road for reasons including the “likelihood of danger to the public” where that restriction or prohibition should come into force without delay. An order made under section 14(2) has a maximum time limit of 21 days, but may be continued under the provisions section 14(1) of the RTRA (for up to 18 months) without a need to publish a new notice of intent, although the publication of a notice stating that the order has been made is still required.
- 8.10 The procedures for making permanent and experimental traffic management orders and the form that they should take are set out within the Local Authorities’ Traffic Orders (Procedure) (England and Wales) Regulations 1996.
- 8.11 The Department for Transport published advice on 21st April 2020 at: <https://www.gov.uk/government/publications/traffic-orders-advertising-during-coronavirus-covid-19>. This advice suggests ways in which authorities can continue to make traffic orders, whilst complying with the intention of the legislation for making those orders. Certain requirements are difficult for local authorities to implement due to current restrictions under the circumstances of the Covid-19 emergency. Specifically, these are:
- the publishing of order adverts in local newspapers - newspapers may have moved to online publication only or closed
 - the posting of site notices on streets and concerns about the risks to staff
 - making traffic orders available for public inspection at an authority’s offices which may be closed
- 8.12 The Traffic Management Act 2004 (TMA) is the primary legislation for the management of parking in England. It reinforces the legal duty under the RTRA to ensure the expeditious movement of traffic. Part 6 of the TMA affects parking and is accompanied by statutory and operational guidance documents. Councils are legally obliged to ‘have regard to’ the former, while the latter sets out the principles underlying good parking management and recommends how this can be achieved.
- 8.13 The main principles advocated in the TMA statutory guidance are:
- managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists), as required under the Traffic Management Act 2004 Network Management Duty
 - improving road safety
 - improving the local environment
 - improving the quality and accessibility of public transport
 - meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car
 - managing and reconciling the competing demands for kerb space.
- 8.14 In April 2020, London Councils published guidance to assist local authorities to consider appropriate temporary measures in the unprecedented and very challenging circumstances around Covid-19. This guidance included advice that enforcement activity should focus on incidents of obstructive or dangerous parking that could have a more significant impact on safety and access for emergency and essential services.

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Continuation of enforcement for moving traffic contraventions, such as no entries, banned turns and yellow boxes, will also be important in order to ensure compliance. Authorities are advised to consider whether to continue the enforcement of non-safety critical controls. This guidance is available on the London Councils website: <https://www.londoncouncils.gov.uk/services/parking-services/operational-advice-during-covid-19>. It is considered that the Council's intention to enforce modal filters by camera in order to allow emergency services through these points, whilst reducing general traffic levels is in keeping with this guidance.

- 8.15 The Council enforces parking and moving traffic contraventions under the provisions of the London Local Authorities and Transport for London Act 2003. Enforcement against contraventions of signs placed prohibiting entry by vehicles to roads which are bus routes or emergency services routes may be taken under the provisions section 4(5)(b) of this act, which to section 36 of the Road Traffic Act 1988 which makes it an offence to fail to comply with the indication of a traffic sign which has lawfully been placed on or near a road. A sign is so lawfully placed if the indication is of a statutory prohibition, restriction or requirement. Signs can lawfully be placed in order to give effect to a TTO under section 68 of the RTRA 1984. Such signs must conform with the Traffic Signs Regulations and General Directions 2016.
- 8.16 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 8.17 In summary, the Council must, in the exercise of its function, have due regard to the need to:
- a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - b) advance equality of opportunity between people who share a protected characteristic and those who do not;
 - c) Foster good relations between people who share a protected characteristic and persons who do not share it.
- 8.18 The duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 8.19 The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>.
- 8.20 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
1. The essential guide to the public sector equality duty

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2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

8.21 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>.

9. Equalities implications

- 9.1 All staff are trained to meet their responsibilities as outlined in the Equality Act 2010.
- 9.2 Section 149 of the Equality Act 2010 (“the Act”) imposes a duty that the Council must, in the exercise of its functions, have due regard to:-
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.3 The protected characteristics under the Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 9.4 The duty is a “have regard duty” and the weight to attach to it is a matter for the decision maker bearing in mind the issues of relevance and proportionality.
- 9.5 A full Equalities Analysis Assessment (EAA) was undertaken as part of the Council’s Transport Strategy and Local Implementation Plan 2019-2041 (LIP3). The proposals set out in this report align with the objectives set out in LIP3, and indeed the LIP3 contained proposals for footway widening, modal filtering, school streets and improvements to cycleways, albeit on a more permanent basis.
- 9.6 Table 1 provides an overall assessment of the current proposals as a whole. The analysis that follows then considers in more detail the protected characteristics where it is considered that there is an impact, and the reasons for this.

Protected Characteristic	Overall Assessed Impact of Proposals
Age	Minor positive
Disability	Neutral
Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and Maternity	Minor positive
Race	Minor positive

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Protected Characteristic	Overall Assessed Impact of Proposals
Religion or Belief	N/A
Sex	Minor positive
Sexual Orientation	N/A

Table 1 – Overall assessment of proposals

- 9.7 It has been evidenced that Coronavirus disproportionately impacts certain groups including the elderly, and those in BAME groups. By allowing people to socially distance, and encourage more walking and cycling, this will have a positive impact on all groups, but particularly these more vulnerable groups. In addition, pregnant women are considered to be a vulnerable group in relation to COVID19 and therefore creating more pedestrian space will benefit them by making it easier for them to stringently follow social distancing guidelines as advised.
- 9.8 TfL's Cycling Action Plan explains that the reasons why people choose not to cycle in London stem principally from the physical and social environments around them. These environments influence different people in different ways, and we know that they create particular barriers to cycling for women, BAME people, older people and disabled people. The schemes set out in this report seek to improve the physical street environment for pedestrians and cyclists, which will help those who may otherwise feel vulnerable, to feel safer and more able to walk and cycle. The Council's aspiration is for everyone to feel that they can cycle on Lewisham's streets if they wish to do so.
- 9.9 Looking at the London wide picture, TfL has estimated that more than half of 'switchable' journeys (i.e. those that could be cycled) are made by women, and 38 per cent are made by BAME people. This highlights that the opportunity to cycle is not limited to any particular group in society. Eighty-one per cent of Londoners are able to ride a bicycle, including 76 per cent of disabled people. Wheels for Wellbeing, a charity whose mission is "to enhance disabled people's lives by ensuring that anyone can access the physical, emotional, practical and social benefits of cycling", state that many disabled people find it easier to cycle than to walk. Fifteen per cent of people in London with a disability do cycle, which is not that much less than the 18% of the general population. Adapted cycles, e-bikes and cargo bikes can allow an even wider range of people to cycle. Most Londoners therefore have the potential to cycle for their daily journeys, but for many it is not a genuine opportunity. By breaking down the barriers to cycling in conjunction with TfL, we aim to enable more people to cycle, and through this see an increase in the diversity and range of Londoners enjoying the benefits of cycling.
- 9.10 However, it is also recognised that for those who have no option but to drive, the reallocation of space away from motorised transport may have an impact on their journey times. For instance the introduction of modal filters and school streets may make a journey longer in distance. On the other hand, if there is an overall reduction in traffic, from those who have chosen to switch modes, then the reduction in congestion may offset any increase in journey time resulting from the longer distance travelled. As highlighted above, there is small difference in the proportion of the general population that are able to ride a bike compared those that are disabled.
- 9.11 If parking bays are suspended, then it is recognised that a potential negative impact is that people may have to walk further between a parking space and their destination. The impact on disabled people is mitigated in part through the provision of the blue badge parking scheme, which entitles holders to certain parking privileges that others do not have. Where dedicated and general disabled parking bays are affected by the measures opportunities to re-provide that parking as close as possible to the original locations and / or key destinations will be given consideration and implemented if practical and reasonable to do so.

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9.12 Table 2 provides an assessment of each of the recommendations shown in section 4. Impacts have been assessed as minor, major, neutral, positive and negative and on whether the recommendations are temporary or permanent.

	Proposal	Impact	Extent	Period	Protected group
1	Urgent measures to tackle pressure points	Positive	N/A	Temporary	All
2	Introducing 'modal filters' on residential streets	Positive	N/A	Temporary	All
3	Creating more space for pedestrians and cyclists along key corridors	Positive	N/A	Temporary	All
4	School streets to allow social distancing outside schools when they reopen	Positive	N/A	Temporary	All

Table 2 - Assessment of each recommendation

10. Climate change and environmental implications

10.1 There is a legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part. Encouraging more journeys to be made by walking and cycling rather than private transport will help to protect against a car based recovery from the COVID-19 pandemic, and the negative impacts associated with vehicular traffic. Keeping traffic and congestion to a minimum will help maintain the improved air quality that has been experienced under lockdown conditions. This will, in turn, help in achieving the objectives set out in the Council's Air Quality Action Plan and Climate Action Plan.

11. Crime and disorder implications

11.1 There are no specific crime and disorder implications resulting from these measures. The Council is working closely with the police counter terrorism advisor to ensure that any concerns in relation to crowding are mitigated where possible by the measures that are being introduced.

12. Health and wellbeing implications

12.1 Many residents have had reason to adapt their daily routines as a result of the COVID-19 pandemic. Looking back at the 3 years to 2017/18, on average only 35% of residents were walking or cycling for at least 10 minutes twice a day (or a single block of at least 20 minutes). Over half of the adult Lewisham population, and 37% of 10-11 year old and 21% of 4-5 year olds are overweight or obese. Road Transport is also the biggest contributor to NOx and PM10 emissions, contributing 64% and 55% of total emissions respectively. As a result of the COVID-19 pandemic we understand that there is evidence of an increase in walking and cycling for essential trips, particularly given the current fears over public transport use and limited capacity. The currently lower traffic volumes are also giving people greater confidence to cycle, that they may not otherwise have.

12.2 In order to protect public safety it is important that people are able to walk/cycle whilst maintaining social distancing recommendations. The Council must take steps to

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minimise road danger, where possible.

- 12.3 It is recognised within the government and TfL guidance that the introduction of the temporary measures to support walking and cycling may help to change travel habits, which maybe sustained beyond the current pandemic, leading to longer term public health benefits. This would increase resilience against current and future pandemics.

13. Social Value implications

- 13.1 The delivery of schemes that create a street environment that encourages walking and cycling will play a significant role in enhancing people's quality of life, their health and in facilitating social inclusion. This is central to the 'Healthy Streets' approach which has been adopted by the Council as part of its Transport Strategy and Local Implementation Plan.
- 13.2 The council is an officially accredited London Living Wage (LLW) Employer and is committed to ensuring that, where possible, contractors and subcontractors engaged by the council provide works or services within Lewisham pay their staff at a minimum rate equivalent to the LLW rate. New contractors will be expected to meet LLW requirements where possible and contract conditions requiring the payment of LLW will be included in the service specification and contract documents. This will significantly help the Council to deliver on its strategic corporate and Mayoral priorities and deliver added value for the borough as a whole.

14. Background papers

1. Transport Strategy and Local Implementation Plan 2019-2041 (LIP3)
<https://lewisham.gov.uk/inmyarea/regeneration/transport-and-major-infrastructure/local-implementation-plan>
2. Reallocating road space in response to COVID-19: statutory guidance for local authorities (DfT May 2020) <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities>
3. London Streetspace Plan: interim guidance for boroughs (TfL May 2020)
<http://content.tfl.gov.uk/lsp-interim-borough-guidance-main-doc.pdf>
4. Corporate Strategy 2018-2022
<http://councilmeetings.lewisham.gov.uk/documents/s61022/Draft%20Corporate%20Strategy%202018-2022.pdf>
5. Lewisham Air Quality Action Plan (2016-2021)
<https://www.lewisham.gov.uk/my services/environment/air-pollution/Documents/LewishamAirQualityActionPlanDec2016.pdf>
6. Letter from St Barts Hospital to Islington Council (May 2020)
<https://twitter.com/WalkIslington/status/1262317851349864448?s=20>
7. Local Authority Parking and Traffic Management Operational Advice during Covid-19 (London Councils April 2020)
<https://www.londoncouncils.gov.uk/services/parking-services/operational-advice-during-covid-19>.
8. Traffic orders: advertising during coronavirus (COVID-19) (DfT April 2020)
<https://www.gov.uk/government/publications/traffic-orders-advertising-during-coronavirus-covid-19>

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15. Glossary

The table below includes a glossary of terms, abbreviations and acronyms used in this report

Term	Definition
COVID-19	Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus
DfT	Department for Transport
EHRC	Equality and Human Rights Commission
EAA	An Equalities Analysis Assessment (EAA) is undertaken when making changes to the way a service is being delivered to ensure that the Council is meeting its obligations in relation to the Equality Act 2010 and the Council's equality objectives
Equality Act 2010	The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.
ETO	An Experimental Traffic Management Order is a legal order made by a Local Authority which manages the behaviour of all road user where consultation is carried out after the order becomes live, with the restrictions already in place. This type of order may be in place for up to 18 months.
Highways Act 1980	An Act of the Parliament of the United Kingdom dealing with the management and operation of the road network in England and Wales
LLW	London Living Wage
Modal filter	a road closure that stops motor vehicles, but which still allows pedestrians and cyclists (including electric cargo cycles) and powered two wheelers through
Modal shift	The change from one mode of transport to another, such as from car to bicycle or public transport.
NHS	National Health Service
RTRA 1984	The Road Traffic Regulation Act 1984 is an Act of Parliament in the United Kingdom, which provides powers to regulate or restrict traffic on UK roads, in the interest of safety
School street	Streets or parts of streets that are closed to vehicular traffic for part of the day at school pick up and drop off, while schools

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Term	Definition
	are open
TfL	Transport for London
TLRN	Transport for London Road Network – a network of roads for which Transport for London is the Highway Authority
TMA	The Traffic Management Act 2004 (TMA) is an act of parliament that was introduced to tackle congestion and disruption on the road network. The TMA places a duty on local authorities to make sure traffic moves freely and quickly on their roads and the roads of nearby authorities
TMO	A Traffic Management Order (TMO) is a legal order made by a Local Authority which manages the behaviour of all road users and which is consulted on prior to restriction being made live
TTO	A Temporary Traffic Order (TTO) is an order made by a Local Authority to restrict or prohibit traffic on the road for road works, where there is a likelihood of danger to the public or to allow litter and cleaning duties to be carried out. Normally requires a notice of intent for at least 7 days before
TTRN	A Temporary Traffic Regulation Notice (TTN) is a notice which may be use to immediately put into effect a TTO where it appears to a Local Authority that the restriction or prohibition should come into force without delay
Zero carbon	Achieving net zero carbon dioxide emissions by balancing carbon emissions with carbon removal or simply eliminating carbon emissions altogether

16. Report author and contact

Alexandra Crush, Transport Policy & Development Manager,
alexandra.crush@lewisham.gov.uk

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