



PUBLIC INQUIRY ON THE TORRINGTON PLACE-TAVISTOCK PLACE TRIAL

BLOOMSBURY RESIDENTS' ACTION GROUP (BRAG)

STATEMENT OF CASE

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1. Background, describing local opposition to the trial from pedestrians and cyclists; and the work of Bloomsbury Residents' Action Group (BRAG) in trying to give local residents a voice and to highlight the adverse impacts of the Experimental Traffic Order (ETO) on the community; also the consultation process which was multiply flawed but which the Council continues to rely on as part of its support for the trial being made permanent
2. The case against the ETO, namely that:
 - a) The trial has not met its objectives with regard to safety and pollution
 - b) The trial has created multiple adverse impacts, which outweigh any positive impacts, and which the Council is largely not taking into account
 - c) There are alternative plans for the area which could achieve the Council's objectives without such adverse impacts, and these have not been fairly and adequately considered
 - d) The Council's Statement of Case supporting the trial being made permanent is based on many statements which are unsubstantiated, and statements for which the evidence is quite contrary to the assertions, and some incorrect information.
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1. Background

1.1 The creation of the Torrington Place-Tavistock Place trial

In November 2015 Camden Council set up a trial traffic system on Tavistock Place and Torrington Place, by means of an Experimental Traffic Order. The aim of the experiment was to:

- a) provide '*a safer and more attractive cycling route, which improves conditions for existing cyclists, while also encouraging new cyclists*'
- b) reduce '*traffic on the route, improve air quality and provide a safer environment for the large numbers of pedestrians and cyclists in the area*'
- c) trial '*wider cycle lanes*'
- d) make '*streets that are easier to cross*'

(Source: Camden Council document on Torrington-Tavistock Trial, November 2015)

1.2 **Some confusion of purpose**

Although the above aims were stated when the scheme was announced, it should be noted that the original purpose appeared to be to mitigate the effects of the West End Project, as set out in Cabinet papers for January 2015.

1.3 **Absence of prior local consultation and first reactions to adverse impact**

Local residents had not been consulted at all. However, a handful of powerful groups with sectional self-interests, who stood to gain from the change, were consulted; namely, TfL, Camden Cycling Campaign, London Cycling Campaign, Living Streets, University College London and the University of London. Some local people received information sheets a few days before the trial works began but huge numbers of local residents knew nothing about it, and so there was a sense of shock to find out one morning that a major route was being blocked off and the surrounding streets were suddenly congested and polluted.

1.4 **Congestion and pollution caused by the trial totally unprecedented**

It is important to state that before November 2015, there was not a traffic problem in this area. The congestion and pollution caused by the displaced traffic from the one-way system is totally unprecedented. At the time of writing this Statement of Case, the congestion is much reduced because it is school holidays. However there have been times when stop-start traffic has backed up solidly for 10 hours a day and for several days a week. Proof of evidence (1).

1.5 **Detrimental to quality of life**

The trial has made the quality of life worse for local people in multiple ways, and this is what BRAG's submission will aim to demonstrate. It is imperative that the Inquiry does not solely focus on the Torrington-Tavistock corridor but includes within its scope the impact on streets that lead off from this now-blocked strategic through-route, which previously allowed passage from Gray's Inn Road to Tottenham Court Road.

1.6 **Establishment of Bloomsbury Residents' Action Group (BRAG)**

In response to the lack of Council-led consultation, and aware of an immediate local sense of anger and concern about the social and environmental adverse impacts of this trial, a group of neighbours set up Bloomsbury Residents' Action Group, in order to give residents a voice.

1.7 **Local consultation organised by BRAG**

- a) As BRAG gathered support they found out that hundreds of other people felt the same way. They realised the tentacle effects of this scheme were being felt far and wide – from Gray's Inn Road to Fitzrovia. BRAG's inaugural meeting was on 26th May 2016 and since then hundreds of local people have signed up with BRAG as supporters, writing a comment on the website, sending emails expressing personal concerns about the trial, signing the Petition or attending a Community Planning Day.
- b) BRAG has been in contact with numerous local organisations: RNIB, UCH, the London Fire and Emergency Planning Authority, the Bedford Estate, the Bloomsbury Association, Marchmont Association, many hotels including the Tavistock, Royal National and Imperial, as well as the Gower Street hotels group, Camden Cyclists, the Licensed Taxi Drivers Association and many residents associations. They have responded to concerns from local people, had many letters published in Camden New Journal and had meetings with Council officers and Council members and with the local MP, Sir Keir Starmer.
- c) BRAG organised a petition which ran between July and December 2016, and which declared:

The Tavistock-Torrington Trial, London WC1, (Experimental Traffic Order, commencing November 2015) has:

- i) Created additional traffic congestion and pollution*
- ii) Made surrounding streets more dangerous for cyclists and pedestrians*
- iii) Severely restricted access for emergency vehicles, in this area of high terrorist risk*

The Tavistock-Torrington trial (Experimental Traffic Order) is a failure and I call for this Trial now to be abandoned.

- d) BRAG's petition was signed by a total of 1083 people. In marked contrast to the Council's official consultation of autumn 2016, which was dominated (86%) by non-residents (see below), this petition focused on local views. 831 signatures were from people who live in the London Borough of Camden, of which 91% (760) were residents of the affected area, that is, from Kings Cross, Bloomsbury & Holborn & Covent Garden wards - plus five signatures from Fitzrovia.
- e) BRAG presented the petition to Councillor Sarah Hayward, then Leader of Camden Council, on 20th December 2016. It was understood from that meeting that Cllr Hayward would ask officers to cross-check petitioners' names with those who had completed the Council's official consultation survey, to ensure that the numbers of objectors to the trial was accurately reflected in the resulting data. It can be seen from the response and petition data that this exercise would demonstrate that more local people were against, than for, the trial. However, BRAG was informed in February that it was after all impossible for officers to cross match names.
- f) Clearly this is not impossible but, rather, a task which would take some modest time and resources. But it is evidently a task which the Council, which is spending tens, and possibly hundreds of thousands of pounds (efforts to ascertain the amount from councillors have not so far been successful) to fight against residents, is not prepared to do. A reasonable estimate might be that it would take an administrative worker up to two days. This in the context of the vast sums of council tax revenues being spent to support the Council's case, does appear to lead to the conclusion that the Council is prepared to spend public money on publishing only one-sided data, which supports its case, and is not prepared to allow the public and the Independent Inspector to see the full picture. Suppressing, or refusing to acknowledge information, would seem to be inconsistent with the Council's barrister's statement at the Pre-Inquiry Meeting that 'There is nothing to be gained by holding things back. Everything should be on the table.'
- g) 116 people either commented on BRAG's website's 'Have your say' section or joined as subscribers
- h) 75 people attended BRAG's public meeting on 4th October 2016. At this meeting views for and against the trial were shared and at the end of the meeting, following the presentation of BRAG's alternative plan, there was overwhelming support for the motion calling for the Council to consider BRAG's alternative plan, with two-way traffic and two cycle lanes, as an alternative scheme for the Tavistock/Torrington corridor. The vote was: 41 for the motion; 3 against.
- i) 70 local people - both residents and people from local businesses - participated in BRAG's Community Planning Day on 8th September 2016. Local people were invited to raise issues of concern, and to discuss solutions and future ideas about

the neighbourhood. Concerns about traffic were raised as a major part of the discussions along with solutions for traffic problems.

1.8 Council consultation

- a) BRAG had assumed that that the main thrust of this Inquiry would not be the consultation process. However the Council's Statement of Case relies on the validity of the consultation response as part of its support for making the trial permanent. It is therefore important to see this trial in the context of a very flawed consultation process; and this has added to the sense of confusion and distrust locally. Had there been a period of genuine consultation prior to the trial, the outcome might have been very different. The unsatisfactory nature of the consultation process is set out in Proof of Evidence 2.
- b) In the autumn of 2016, Camden Council carried out its flawed consultation, and hailed its outcome as a success for the trial road layout, on the grounds that 79% of their respondents were in favour of the trial. However, the vast majority of those who responded (86%) not only did not live in the affected area, but did not even live in the wider borough of Camden. The Council consultation identified, **out of those 15,000 respondents, only 564 local (WC1) residents were in support of the trial.** Seeing this figure of 564 local people in favour, in the context of the BRAG petition findings of **760 local people opposed to the trial,** it can be seen that ***there is no local mandate to keep the trial scheme.***
- c) The status of the 86% non-Camden supporters of the scheme now becomes a major question in this Inquiry, fuelled by the Council's continuing to promote the consultation outcome as a triumph, coupled with its insistence on secrecy. The location of these 86% is shrouded in mystery, in a way which starts to look like obfuscation. The Council is relying strongly on these responders as evidence of legitimate support for their scheme, and yet is refusing to divulge information about them. Of course there is no expectation that personal details should be published. However, the Public Inquiry needs to know where these people come from, in order to assess the relevance and validity of their participation. It is reasonable to argue that responders who live in other, and maybe distant, parts of the country should not be influencing how our local streets are laid out; they may not know the area; they may never have been here; and they do not have to live with the resulting detriment to quality of life. The ongoing refusal by the Council to co-operate with local people by sharing this information leads necessarily to suspicions that many of the responders live far away. Camden Cyclists, who have been strongly supportive of the Council's scheme, and who receive funding from the Council, ran an online campaign to gather support for the trial.
- d) However, the Council has refused, despite requests made by local people and by a Councillor in Cabinet (22nd February 2017), to take into account of local residents and voters who signed the petition, or to give greater weight to the views of residents in the borough, and especially residents affected by the trial. It is not known how many of the 86% non-resident responders had seen Tavistock Place, or how well informed they were about the trial or its impact. 54% of respondents claimed no connection with the borough other than 'passing through'.
- e) In an attempt to identify precisely where the supporters of the trial scheme live, a local resident has made repeated attempts to ask Camden Council for this information. In the absence of co-operation, the resident has had to resort to the Freedom of Information Act in order to access this information which is non-

confidential, publicly-funded data, and which could be key information for the Public Inquiry. This matter is now being formally investigated by the Information Commissioner. This is set out fully in Proofs of Evidence 3.

- f) The Council told the local residents who sought this information that the cost of providing this data would be in the region of £9,975, but when the resident asked what would happen if he raised the money, his request was still rejected. The Council barrister at the Pre Inquiry meeting said that supplying data from consultation response would be 'impractical'. However, considering this from a practical viewpoint, it is the case that the Council could input the first part of postcodes into a GIS (geographical information system) which would provide a map of the geographical location of respondents without any need to redact personal data or comments; it is recognised of course that no personal data must be shared. There would indeed be an administrative task involved. If it took 10 seconds to enter each part post code, then the task would take 41 hours of administrative time; or possibly less if suitable software were applied. But even supposing it did cost £9,975 to provide this data for the benefit of all concerned with the Public Inquiry, and in the interests of fair and true evidence being presented, this amount would be small fry compared with the amount being spent on the Council's expenditure in consultants and legal advice. In this context, 'impractical' appears to mean that the information might not support the continuation of the trial and so not be in the Council's own interests, regardless of whether it would be in the interests of openness, fairness and truth. Again, it does not appear to be congruent with the Council barrister's stated principle stated at the Pre-Inquiry Meeting, 'There is nothing to be gained by holding things back. Everything should be on the table.'
- g) BRAG believes the views of those affected should be given more weight than the views of those people who are not affected, and who may never have even been to the affected area, but the Council rejected this view in Cabinet on 22nd February 2017. The Council has refused to take account of this local petition. Dismissing the implications of the petition, Councillor Phil Jones, who was the lead councillor on this scheme (but resigned from the Cabinet immediately before the Public Inquiry), said in Cabinet that comparing the 564 local residents for, with the 760 local residents against the trial, would be like 'comparing apples and pears'. In fact it is not 'comparing apples and pears', but comparing the numbers of local people who are for and against the trial, which appears to be something the Council has difficulty acknowledging.

2 The case against the trial

2.1 The submission from BRAG to the Public Inquiry seeks to show through local witness statements and other evidence, including photographs and video clips, that:

- a) The trial has not met its key objectives
- b) The trial has created multiple adverse impacts, which outweigh any positive impacts, and which the Council is largely not taking into account
- c) There are alternative plans for the area which could achieve the Council's objectives without such adverse impacts, and these have not been fairly and adequately considered

- d) The Council's Statement of Case supporting the trial being made permanent is based on multiple unsubstantiated statements and some incorrect information.

2.2 THE TRIAL HAS NOT MET ITS KEY OBJECTIVES

2.2.1 Air quality has not generally improved.

- a) The Torrington-Tavistock trial has caused massive displacement of traffic on to surrounding streets. Prior to the trial, 4,500 vehicles per 12 hours travelled west-bound on the trial route; **those 4,500 vehicles were suddenly displaced on to the surrounding residential streets**, creating long queues of stop-start traffic and a concomitant increase in pollution.
- b) The Council's data on changes arising from the trial reflect people's perceptions of greatly increased traffic; for instance in Judd Street morning rush-hour traffic north-bound has increased by 58%, and in Southampton Row north of Fisher Street, morning rush-hour north-bound traffic has increased by 99%.
- c) This increase in volume on surrounding streets has led to unprecedented congestion. This congestion in turn results in idling, stop-start traffic, with diesel engines polluting densely residential streets for many hours per day.
- d) Although the Council has been told by residents about this increased congestion and pollution in Judd Street and Hunter Street since November 2015, no monitoring of air quality was originally set up in those streets, or on other severely affected streets such as Southampton Row. A monitor was set up belatedly in Judd Street, in February 2017, but as there will be no pre-trial comparative data, the usefulness of this is doubtful. Monitoring has taken place in three places including Tavistock Square, where air quality has improved, and this has been heralded as a success. The failure of the scheme in causing increased pollution on other streets is being ignored. What the Council has done is in fact to create more congestion and pollution, in the surrounding area. Traffic in Tavistock Place and surrounding streets used to be mobile, albeit often slow; now that same traffic is squeezed on to fewer streets, it has become frequently stop-start, making the total sum pollution undoubtedly much higher, given that idling and stop-start engines cause more pollution.
- e) On Judd Street, a journey of 140 metres which normally takes a car about 20 seconds often now takes 9 minutes. In such congested times, therefore, each car is spewing fumes for 27 times as long as before the trial; so, counting the number of cars is of no use at all in assessing pollution increase. But this common sense conclusion drawn from daily observation cannot be tested because the Council did not set up monitors on the streets which it was known would have to absorb the displaced traffic from Tavistock Place.
- f) Proof of Evidence (4) demonstrates the stop-start traffic created by the one-way system, and the impact of the diesel smog which now some days permeates these densely packed residential streets (over 400 dwellings on Judd Street alone) with high buildings which prevent the emissions from escaping.

2.2.2 The Torrington-Tavistock corridor is not safer for cyclists

- a) The Council has produced no evidence to show that cycling is safer on the Torrington-Tavistock corridor. Indeed, on the contrary, the Council SoC admits: *'Early indications from draft collision data suggest an increase in accidents*

involving cyclists' (SoC 7.8), thus stating that one of the main aims of the trial has not been met.

- b) BRAG also questions the Council's November 2016 hard copy leaflet justifications for the trial, namely that '*The previous cycle lane had become overcrowded, causing safety problems'* and '*The route suffered from a high casualty record, particularly due to collisions between motor vehicles and cyclists, cyclists and cyclists'*.
- c) The Council's statements after the consultation referred to cyclists 'feeling safer', as if this were proof of safety, which it clearly is not. Now that 2016 data is available, it is clear that the trial has not reduced cycle casualties. Indeed, it may have increased the risk to cyclists by creating an environment where they feel safe to ride faster, as the Camden SoC acknowledges in paragraph 7.8
- d) BRAG's Proof of Evidence (5) sets out the evidence on cycle safety.
- e) One of the original aims of the trial was to create wider cycle lanes to enable cyclists to ride faster and overtake. Now it appears that this has brought about increased risk to cyclist safety. (Council SoC 7.8).
- f) Although the Council reports that some of the 15,000 respondents (86% of whom were not from Camden) felt safer, many local cyclists who use the route regularly, do not. This is set out in Proofs of Evidence (6). Some cyclists feel safer; others do not.

2.2.3 Cycling is more dangerous on surrounding streets

- a) The Torrington-Tavistock trial has caused massive displacement of traffic on to surrounding streets. Prior to the trial, 4,500 vehicles per 12 hours travelled west-bound on the trial route; **those 4,500 vehicles were suddenly displaced on to the surrounding residential streets**, creating long queues of stop-start traffic and a concomitant increase in pollution.
- b) It has also caused a much more hazardous environment for cyclists. Cyclists are frequently observed having to weave in and out of the newly-created congested traffic, in a way which did not happen before November 2015. They also, when blocked by congested traffic, frequently overtake the vehicles and ride on the wrong side of the road in the face of oncoming traffic, obviously increasing the risk to their own safety, as well as that of others. Motor cyclists also often ride in the face of oncoming traffic, with obvious increased risk to general safety. Proofs of Evidence (6) demonstrate this.

2.2.4 No significant decline in pedestrian accidents

It appears that there were no pedestrian accidents on the corridor in the last year. However this is not statistically significant in this context and cannot be attributed to the trial, since this is part of a long term declining trend. Proof of Evidence (15)

2.3 THE TRIAL HAS CREATED MULTIPLE ADVERSE IMPACTS, WHICH OUTWEIGH ANY POSITIVE IMPACTS, AND WHICH THE COUNCIL IS LARGELY NOT TAKING INTO ACCOUNT

- a) In broad terms, Bloomsbury Residents' Action Group argues that the Council has failed to demonstrate that the positive impacts outweigh the adverse impacts, and so, according to its own stated policy, the trial should not be made permanent
- b) On 21st January 2015, long before the imposition of the trial and the subsequent consultation, the Council had decided at a Cabinet meeting to approve a separate scheme called the West End Project (which radically changes the layout of major roads contingent to the area in question, and which the Cabinet knew would impact on the area in question) and, as part of that project, to approve a trial to reduce west-bound traffic on Tavistock Place and Torrington Place.
- c) In Appendix H to Item 16 of that Cabinet meeting, Camden Cabinet stated:

If the trial showed that positive impacts outweighed any adverse impacts, the changes could be made permanent.
- d) In its submissions to the Public Inquiry, Bloomsbury Residents' Action Group seeks to demonstrate that the Council has failed to show that positive impacts outweigh the adverse impacts, and that therefore the trial should not be made permanent. Despite many meetings and the submission of evidence, the Council appears set on largely ignoring the adverse impacts. When obliged by the facts to face up to some of these adverse impacts, the Council's response has been, rather than to address the cause of the problem, to ignore them or to create more changes, in mitigation, which in turn seem very likely to create further traffic problems.

2.3.1 The trial has created multiple adverse impacts as follows:

- a) Made air quality, pedestrian and cyclist safety generally worse, as shown above
- b) Increased security risks with emergency vehicles being impeded
- c) Necessitated longer vehicle journeys thereby increasing the risk of accidents and pollution
- d) Delayed patient and health care staff journeys between hospital sites, which occur daily
- e) Made mobility and access more difficult and more expensive for a particular section of pedestrians - frail, older and disabled people
- f) Threatened the sustainability of the community by making the practicalities of daily life for residents and local businesses more difficult and stressful

2.3.2 Increased security risks with emergency vehicles being impeded

- a) Tavistock Place and Judd Street are both part of the network of key routes for emergency vehicles, which are now either blocked or impeded – and will be further impeded if the Council proceeds with road blocks at the junctions of Judd street and Euston Road, and Hunter Street and Lansdowne Terrace (one of the proposed potential 'mitigations' for the problems caused by the trial – a 'mitigation' which will in fact exacerbate the problems). Proof of Evidence (7) shows the emergency routes, as set out by Camden Council.

- b) Residents are aware that this is an area that has been a terrorist target (the bombings of 7/7); two bombs were in this precise area, one in Tavistock Square, and one on the Piccadilly Line directly below Judd Street. This is likely to continue to be a high risk area, given the proximity of three train stations, Eurostar, long distance rail passengers and a high density of tourists and commuters. There are also two major hospitals in the area, UCH, with its multiple sites including Queen's Square, and Great Ormond Street. There are also several very large hotels and hostels. The security implications of the traffic changes and the consequent gridlock, or of the further plans to block emergency routes, have been brought to the Council's attention on many occasions, but it seems that officers, who it is understood do not mostly live in the area, do not consider this important. It is considered to be extremely important by the people who live here.
- c) The safety of people in the area should be the primary concern of the council and the Tavistock trial is making the area less safe by causing congestion and blocking emergency routes and thereby increasing response time.
- d) Proof of Evidence (14 – video evidence) demonstrates the problems being experienced by emergency vehicles.

2.3.3 Longer vehicle journeys now necessitated, thereby increasing the risk of accidents, congestion and pollution

- a) On 10th March 2016, the Council held a hastily convened meeting at Pancras Square, to allow local people to find out what was happening. There were about 60 people present, almost all of whom expressed great anger at the changes which had been imposed on the neighbourhood without consultation or for many without warning. One of the facts to emerge was that the Council had not thought through how people would get around the area, with the closure of the major west-bound route. Asked some specific questions about how people would travel between certain locations, officers, clearly thinking on their feet, looked at maps and suggested the roundabout routes which would now be necessary. An exacerbating factor was that the closure of the north end of Judd Street was under consideration by the Council – and still is. This would mean that a resident living near Tavistock Place, for instance on Thanet Street, who needs travel by taxi or car to hospital, would have to travel east to Gray's Inn Road, in order to go west to University College Hospital. This journey would be more than twice as long, generating twice as much congestion, pollution, and risk of accidents; thus undermining the claim that the one-way system would improve safety and pollution.
- b) It became clear at a public meeting on 19th September 2016 at the Lumen Centre, that the Council was accepting of the fact that the one-way system would result in longer vehicle journeys within the area – that is, more traffic -, with all that entails. The Marchmont Association notes of the meeting read:

From a resident

When managing the traffic the Council should realise that when roads are closed the traffic does not just go away, but just goes somewhere else.

Response from the Council

Some journeys will be longer. It is thought that 11% of car journeys will be switched to another means.

- c) It is not known what the evidence base is for the 11% drop. The Council talks about unnecessary vehicle journeys but has provided no evidence that many journeys are unnecessary; indeed, with the traffic conditions, congestion charge and parking restrictions, it seems unlikely that people would make frivolous car journeys in central London. However, taking this 11% drop as correct, that still leaves 89% of journeys still being made; and many of those journeys will be longer, sometimes significantly, with increased risk of road traffic accidents, and increased congestion, as cars are displaced, with associated increased pollution.
- d) So the Council's aim to reduce traffic, whilst having obviously succeeded on the Torrington-Tavistock corridor where west-bound traffic is banned, appears to have back-fired, as the one-way system has caused longer journeys and increased traffic in the surrounding area, with increased pollution and risk to safety.
- e) The Council's SoC refers, in Appendix C to the loss of a '*westbound short cut through for motor traffic*'. The west-bound Torrington-Tavistock corridor was not a short cut; it was not even only a key west-bound vehicle route; it was in fact the only west-bound vehicular route between the Strand and Euston Road; once that is digested, one begins to understand the mayhem caused by its closure. In using the term 'short cut' the Council seeks to belittle the corridor's strategic importance as a vehicular route; and to sweep under the carpet the impact of its closure.

2.3.4 Delayed patient and health care staff journeys between hospital sites, which occur daily

- a) The University College London Hospital Trust (UCLH) regularly needs to move patients between Queen Square departments and the main campus on Tottenham Court Road, when tests or treatment needs are complex and go beyond what can be provided at Queen Square. There are also east-west patient journeys to the main campus from Throat Nose and Ear Hospital) but these are relatively infrequent and both hospitals will be relocated to Tottenham Court Road in due course.
- b) The west-east journey time is not an issue for UCLH because cars and ambulances can still approach Queen Square via Euston Road and Upper Woburn Place.
- c) UCLH's main concern is therefore with east-west journeys between Queen Square (the National Hospital for Neurology and Neurosurgery and the Royal London Hospital for Integrated Medicine) and the main UCLH sites at the top of Tottenham Court Road. The journeys involve not only patients but staff, especially senior staff with responsibilities covering all trust sites. Delays for patients put care at risk but delays for staff waste valuable work time and are a hidden cost for the NHS.
- d) Prior to the ETO no data on journey times was collected at UCLH. But the trust's transport managers estimate that a journey from Queen Square to the main campus would normally have taken 20 minutes or less, using the Tavistock-Torrington route.
- e) In January-April 2017, records for 147 non-emergency patient journeys between Queen Square and the main campus were analysed. The average east-west journey now takes about 50 minutes. The ETO has therefore added about 30 minutes to a journey which used to take 20 minutes.

f) The trust is not able to count the total number of east-west journeys, taking in additional emergency journeys, journeys by patients who make their own way from site to site, and staff journeys. Their data is based only on journeys by patients eligible to use the non-emergency transport service, who are a small minority of outpatients generally. But it is reasonable to say that the impact on journey times would not be different for different groups.

g) In providing this data, it should be understood that the trust is not opposing the introduction of better cycle tracks. Many trust staff cycle to work and welcome the tracks. But patients must also be considered.

h) BRAG explained this adverse impact to hospital staff and patients in two meetings with the Council. The Council is aware of this problem of delays to patients and hospital staff, with the concomitant waste of staff time and public money, alongside increased journey times and pollution, since it states in the Equality Impact Assessment (EIA) attached to its SoC:

'University College Hospital London, Euston Road, NW1 2BU – staff who cycle to work support the proposal but hospital is concerned about increase in east-west journey times between sites; from Queen Square to UCH campus have increased from 10 minutes to 45 minutes and from Grays Inn Road to UCH campus from 15 minutes to 37 minutes. Would like traffic options explored that ease journey times from east to west. Wish to see good provision for cyclists but need a solution that does not cause delay and stress for patients. What guarantees can be given that emergency service vehicles and patient experience on reaching/departing the hospital are not compromised?

'National Hospital for Neurology and Neurosurgery – Hospital Transport Department, Queen Square, WC1N 3BG - Would like to return to pre-trial layout. Our patients travel to and from the main Hospital in Euston Road to Queen Square and their travel journey time has increased due to the road being made into a one way street, thus backing up traffic on the main Bloomsbury Road. Pre-trial layout worked best as it did not create traffic jams along Torrington Place and Bloomsbury.

'London Ambulance Service – Scheme causes delays in arriving at incidents.'

i) The purpose of an organisation conducting an EIA is to identify situations where certain groups might be disadvantaged, and then to address that disadvantage. If no mitigating action is taken, the EIA is a pointless paper exercise, undertaken to meet the letter of the law but not to address the needs of the people in question. The Council has written an extensive EIA, in which it recognises it is disadvantaging hospital patients, but makes no proposal to ameliorate that disadvantage. This point is taken up in 2.3.5 below, with regard to people with disabilities.

j) Proof of Evidence (8) demonstrates further the problems caused to hospital patients and staff by the one-way system.

2.3.5 Mobility and access more difficult and more expensive for a particular section of pedestrians - frail, older and disabled people

a) The Camden transport policy hierarchy is: pedestrians – cyclists – public transport. However, in creating the ETO, the Council has prioritised cycling at the expense of everything else. In particular they Council has shamefully neglected the needs of frail, older and disabled people. The trial has caused a great deal of distress and has worsened mobility for many frail, older and disabled people.

b) The transport hierarchy ignores the fact that pedestrians – supposedly the highest priority – who cannot walk far, have to use public transport, which on the roads will be buses or taxis; and as there are no bus routes in this immediate

area, the mode of transport has to be taxi or private car. The Tavistock trial has disadvantaged frail, older and disabled people in numerous ways, arising from both the blocking of routes and new prohibitions or impediments to dropping people off.

- c) Local taxi journeys can now take four times as long and cost four times as much; this additional cost is being imposed on a section of the community who are typically on lower than average incomes. Proof of evidence (9) demonstrates this point further.
- d) One very clear way in which disabled people have been disadvantaged is that wheelchair users wishing to enter the Tavistock Hotel have had their direct access removed. The problem is that now taxis can travel only eastwards, it is the driver side which abuts the hotel entrance, but the ramp for wheelchairs is on the passenger side. At the public meeting held at the Lumen Centre on 19th September 2016, the following exchange is recorded in the notes:

From a taxi driver

Because the ramps in black cabs are on the nearside, it is not possible for the east-bound taxis (west-bound not being allowed in the trial) to ensure that people in wheelchairs can get out of the cab safely when going to the hotel. Moreover, the ramps cannot fit on the concrete divider in the road. It is not good enough for disabled people. Is the Council aware of this problem for people in wheelchairs and what is being done?

Response from the Council

The Council is aware of the problem for people in wheelchairs and the options for people in wheelchairs wanting to get into the hotel are to be dropped off across the road or around the corner on Bedford Way.

- e) In fact it was erroneous to say wheelchair user could be dropped off across the road, as taxis cannot park next to the pavement because of a concrete raised platform. In the Council's SoC, it states:

'The Council have incorporated a dedicated taxi rank along the route enabling taxi's to arrive at the kerb side so disabled users can use the disabled loading facilities on this side of the vehicle.' (7.17)

- f) This is somewhat misleading since the loading bay does not enable wheelchair users to access the main entrance of the hotel directly. Basically, wheelchair users would have to be dropped off in an adjoining street and propel themselves, or be pushed, some distance, around 50 metres. Pushing an adult in a wheelchair is a hard job, and any extra distance or impediment adds significantly to the difficulties that people with disabilities and their carers already have to deal with.
- g) The Council's response implies they have solved the problem. But it is the case that wheelchair users cannot access the main entrance, as they used to be able to, and so are disadvantaged by the scheme. The Council's SoC Equality Impact Assessment recognises that a '*distance of 46m to travel from a drop-off or to a pick up point on the north side of the corridor would inconvenience some disabled people*', but considers '*it is not an unreasonable distance to travel*'.
- h) The point is that the one-way system makes access worse for wheelchair users. The EIA is used to explain this, rather than to address it. It shows a lack of empathy and understanding for people with mobility problems and a tick-box approach to addressing inequality; the EIA is written and the Council feels that is sufficient.

- i) Pedestrians are supposed to be the top priority, in Council policy. And pedestrians with mobility problems should be given greatest attention within that priority group. In this case the Council has prioritised cycling over pedestrians with mobility problems, and has not acted in accordance with its own policy.

2.3.6 Threat to the sustainability of the community, by making the practicalities of daily life for residents and local businesses more difficult and stressful

- a) Getting around the area by vehicle is, as has been shown above, very much more difficult now. This makes ordinary life for people needing deliveries, or having luggage or children to transport more difficult and stressful.
- b) The one-way system has also impacted negatively on local businesses. The area around Tavistock Place is largely a residential area, with over 22,000 voters in the three affected wards, with a proportionate number of local businesses which help to make the area sustainable and vibrant. Local people rely on local businesses to keep the area a thriving community; and local businesses rely on being able to travel around the area. If local shops and other local businesses close, and if local people find that getting around, or the business of daily life, is just too difficult because of the road systems, there is a risk that flats will cease to be long term homes, but will increasingly become short-term lets, and the current healthy community will be undermined.
- c) Proof of Evidence (10) explains this further.

2.4 There are alternative plans for the area which could achieve the Council's objectives without such adverse impacts, and these have not been fairly and adequately considered

- a) Various groups have suggested alternative plans which would accommodate cycle lanes without causing the problems generated by the trial. Some, for instance, have suggested that a west-bound only route would be less damaging to the community, which BRAG agrees has some validity.
- b) BRAG has put forward a plan which would accommodate two unidirectional cycle lanes and two traffic lanes, meeting all national width standards. Proof of Evidence (11) sets this out in detail.
- c) A key aspect of this plan to take into account is that this corridor used to have two-way traffic and two separate cycle lanes. Local cyclists say this worked well and could not understand why the Council changed it. It is understood that there were local objections when the Council decided to replace the two unidirectional cycle lane with one bidirectional lane, but these objections were overruled.
- d) BRAG's proposed scheme is a reversal of the trial scheme to its previous two way traffic but with the modification that, instead of one bidirectional cycle lane, there should be two unidirectional cycle lanes.
- e) The Council has rejected this scheme but BRAG considers this rejection is not based on a fair assessment. Proof of Evidence (12) sets this out in detail.

2.5 The Council's Statement of Case supporting the trial being made permanent is based on many statements which are either misleading or unsubstantiated, and statements for which the evidence is quite contrary to the assertions, and also some incorrect information. Some examples are set out immediately below.

- a) (SoC 1.1) The SoC implies that the Council planned this reduction of west-bound traffic in November 2015. In fact the decision to do this was taken at the Cabinet meeting in January 2015, when the West End Project was approved.
- b) (SoC 2.4) Tottenham Court Road is described as heavily congested; it is not; whereas Gower Street is sometimes congested, especially towards Oxford Street. The decision to move traffic from Tottenham Court Road to Gower Street means that in Gower Street, already sometimes congested, the current two southbound + taxis which use the bus lane, will be squeezed into one southbound lane. Also pavements will be narrowed, which is not congruent with pedestrians having priority.
- c) (SoC 2.6) The area referred to as the Brunsick Square Project is already aesthetically pleasing, with much greenery, and is easy for pedestrians to negotiate. Before the beginning of the trial in November 2015, this was peaceful area. Now it is often congested with displaced traffic. The answer is not to cut off further streets and add to the traffic jams, but to undo the one-way system.
- d) (SoC 8.6) This paragraph is simply false. BRAG did not propose such a scheme.
- e) (SoC 2.2 and 8.7) The statement in 8.7 is also false. According to the Council's own data, *'Prior to the trial, the corridor served approximately 250 motor vehicles per hour (vph) eastbound and 350 vph westbound in peak hours.'* If the eastbound traffic rather than the westbound were removed, there would be less displacement; ie there would be 250 vph reassigned to local roads, rather than 350 vph, as is now the case. The Council opted for the route which would displace most traffic on to surrounding streets. So it cannot not be true to say, as the Council, states in 8.7:

'A suggestion has also been made that the one-way vehicular traffic flow should be reversed so that it runs in a westbound direction. Broadly speaking this could achieve one objective of reducing motor traffic along the corridor, but a comparative modelling exercise indicated a greater level of reassignment to more local roads.'

Either the modelling or the data quoted in 2.2 must be erroneous.

- f) The above gives some examples of areas of weakness in the Council's SoC; and this is the document in which they are relying to prove the trial should be made permanent. More detailed commentary is provided in Proof of Evidence (13)

4. Conclusion

- 4.1 The Council's SoC does not provide sound evidence for the trial to be made permanent.

- a) The trial has not met its objectives with regard to safety and pollution

- b) The trial has created multiple adverse impacts, which outweigh any positive impacts, and which the Council is largely not taking into account
 - c) There are alternative plans for the area which could achieve the Council's objectives without such adverse impacts, and these have not been fairly and adequately considered
 - d) The Council's Statement of Case supporting the trial being made permanent is based on many statements which are unsubstantiated, and statements for which the evidence is quite contrary to the assertions, and some incorrect information.
- 4.2 The west-bound Torrington-Tavistock corridor which has been blocked was not a short cut; it was not even only a key west-bound vehicle route; it was in fact the only west-bound vehicular route between the Strand and Euston Road; once that is digested, one begins to understand the significant problems caused by its closure.
- 4.3 BRAG proposes that corridor should be reversed to its previous two way traffic but with the modification that, instead of one bidirectional cycle lane, there should be two unidirectional cycle lanes.

Nicky Coates
Chair, Bloomsbury Residents' Action Group

Proofs of Evidence will demonstrate:

1. Traffic displaced from Tavistock Place
2. The flawed nature of the consultation process
3. The Freedom of Information request for data
4. Stop-start traffic and consequent pollution in surrounding streets
5. Cycling accident information
6. Increased risk to cyclists in surrounding streets
7. Routes designated for emergency vehicles
8. Problems caused to hospital patients and staff
9. Problems caused for people with impaired mobility
10. Problems caused for local businesses
11. BRAG's proposal to reverse the trial, but with modifications
12. Commentary of the Council's critique of BRAG's proposal
13. Commentary on the Council's SoC
14. Video evidence covering displaced traffic, risks to cyclists and the impeding of emergency vehicles
15. Pedestrian accident information

Documents to be referred to:

- a) National standards re road widths etc as referred to by Council barrister in Pre Inquiry Meeting, and which, it is understood, will be part of a common library of documents
- b) BRAG formal response to the consultation
- c) Camden Council Cabinet papers for January 2015
- d) Website document (not the hard copy leaflet) published by the Council at the beginning of the trial in November 2015
- e) BRAG's Community Planning Day Report