

**Report for:** Cabinet 7 December 2021

**Title:** Implementation of St Ann's Low Traffic Neighbourhood

**Report**

**authorised by:** David Joyce, Director of Housing, Regeneration & Planning  
Stephen McDonnell, Director of Environments & Neighbourhoods

**Lead Officer:** Rob Krzyszowski, Assistant Director Planning, Building Standards & Sustainability  
Mark Stevens, Assistant Director Direct Services

**Ward(s) affected:** St Ann's, Harringay, Tottenham Green

**Report for Key/**

**Non-Key Decision:** Key

**1. Describe the issue under consideration**

1.1 This report seeks approval of the principle to implement the St Ann's Low Traffic Neighbourhood (St Ann's LTN) experimental scheme (Engagement Stage 3 Consultation Option A) and a range of complementary measures including new pedestrian crossings, cycle hangars and two trial School Streets. The St Ann's LTN aims to reduce or remove non-local motor traffic from residential areas of St Ann's, as well as reduce the number of short trips made by vehicles which could be walked or cycled. The proposed St Ann's LTN would be implemented on a trial basis for a maximum of 18 months under an experimental traffic management order.

**2. Cabinet Member Introduction**

2.1 Haringey is embarking on a programme of implementing Low Traffic Neighbourhoods (LTNs) to deliver the objectives set out in the adopted 2018 Transport Strategy and the public consultation draft of the Haringey Walking and Cycling Action Plan (2021) and as part of our ambitious Streets for People initiative. LTNs are needed across the borough to 1) reduce pollution, especially NO2 and particulate matter, which can affect lung function and breathing, worsening respiratory diseases including asthma in children and chronic obstructive pulmonary disease (COPD) in adults; 2) improve health outcomes related to inactivity; 3) reduce motor traffic collisions; 4) reduce carbon emissions in our attempt to avoid catastrophic climate change and finally 5) reclaim neighbourhood streets for pedestrians and communities and to make safe welcoming, inclusive spaces for all residents.

- 2.2 In contrast to many other London boroughs that implemented LTNs in 2020 with limited public engagement and consultation ahead of implementation, Haringey has undertaken significant engagement and consultation on the proposed St Ann's LTN. Over the past year, the Council has carried out three separate engagements on the proposed St Ann's LTN and numerous additional engagements with key stakeholders. We have listened to feedback and comments, sought to address the key concerns raised, and the ideas and opinions shared have been fed into the design of the St Ann's LTN.
- 2.3 Public consultation (Stage 3 Engagement) was carried out on two options for the proposed St Ann's LTN: Option A and Option B. Option A would remove all through-traffic from the area, whilst Option B would remove some north-south movements and all east-west movement through the area but maintain the existing through movements on Black Boy Lane, Cornwall Road and Avenue Road. The Council has considered all feedback to the public consultation.
- 2.4 Although there were a range of views expressed, there was clear support for reducing the motor traffic in the area. Respondents were overall positive about Option A and overall negative about Option B. Option A, which removes all through-traffic from the area rather than just part of it, offers greater benefits than Option B and will be a key driver towards a safer, cleaner, greener, fairer and happier borough and having regard to the support for it. I am therefore recommending that Option A, together with the associated complementary measures, is taken forward on a trial basis.
- 2.5 Option A will remove all through-traffic, reclaiming local streets for the people who live there, making them once more community spaces where people meet, chat, socialise and where children play. Together with the proposed complementary measures, it will improve the walkability and cyclability of the local area, creating safe, active travel corridors between local amenities including shops, schools, surgeries, parks and leisure facilities.
- 2.6 The Council will continue engagement with the local community and other key stakeholders and communities as the proposals come forward. During the trial, we will keep channels of communication open for residents and the wider community to feedback their experience.

### **3. Recommendations**

That Cabinet:

- A) Notes the responses received to the proposed St Ann's Low Traffic Neighbourhood (LTN) as part of Engagement Stage 1 (Early Engagement), Engagement Stage 2 (Community Design Workshops)

and Engagement Stage 3 (Public Consultation) as set out in Appendices E and K;

- B) Approves the making of the experimental traffic management order to implement the St Ann's LTN experimental scheme, as set out on the plan in Appendix L, subject to funding, and provided that any changes to the plan in Appendix L are reported back to the Leader, Cabinet or an individual Cabinet member for approval before being implemented;
- C) Approves the making of an experimental traffic management order to implement the School Streets, as set out on the plan in Appendix L, subject to compliance with relevant statutory requirements and detailed engineering drawings to implement the traffic control measures show on the plan;
- D) Approves the bike hangars, as set out on the plan in Appendix L, subject to compliance with relevant statutory requirements and detailed engineering drawings;
- E) Approves the pedestrian crossings, as set out on the plan in Appendix L, subject to compliance with relevant statutory requirements and detailed engineering drawings;
- F) In relation to the LTN only, approve the exemption of:
  - a. Blue Badge holders living within the LTN or on its immediate boundary;
  - b. Special Educational Needs and Disabilities (SEND) transport; and
  - c. Essential Haringey Council services catering for people with a disabilityto non-hard closure filters in the St Ann's LTN experimental scheme as per paragraph 6.71 of this report.
- G) Delegates approval to the Director of Environment & Neighbourhoods to agree the engineering drawings for the experimental traffic management orders for the St Ann's LTN and School Streets and the engineering drawings for the bike hangars and pedestrian crossings, set out recommendations B to E provided any changes to the Plan in Appendix L do not need to be reported back to the Leader, Cabinet or an individual Cabinet member as a key decision;
- H) Authorises the Director of Environment & Neighbourhoods, in consultation with the Cabinet Member for Environment, Transport and the Climate Emergency, to modify or suspend the operation of the experimental traffic management

orders for the St Ann's LTN and/or School Streets if it appears to the Director essential in the interests of the expeditious, convenient and safe movement of traffic or for providing suitable and adequate on-street parking facilities, or for preserving or improving the amenities of the area through which any road affected by the order runs provided any decision to modify or suspend does not need to be reported back to the Leader, Cabinet or an individual Cabinet member as a key decision.

#### **4. Reasons for decision**

- 4.1 The proposed St Ann's LTN has been developed over 10 months informed by a significant amount of engagement with local residents and other key stakeholders. In early 2021, the Council began early engagement with residents and businesses on the proposed LTN. The most common issues raised by respondents were 'traffic speeding', 'poor cycling environment', 'traffic volumes' and 'rat running traffic'. The most common suggested improvements were 'reduce traffic volumes', 'reduce traffic speeds', 'more cycle infrastructure' and 'increase traffic and speeding enforcement'. Following this, a series of St Ann's LTN design proposals were developed to help address the concerns raised. Engagement was carried out on these in May 2021 via online Community Design Workshops.
- 4.2 From 16 August 2021 to Friday 17 September 2021, a public consultation was held on two potential design options (Option A and Option B). Based on the quantitative and qualitative data received as part of the consultation, there was strong support among participants for the introduction of a St Ann's LTN. A clear preference was expressed for Option A which removes all through-traffic from the area. Those who were in support of Option A wanted to see measures introduced that reduce through-traffic in the area to create a quieter and safer environment within the St Ann's LTN, with improvements to air quality and improvements in cycling safety.
- 4.3 It is noted, however, that support for Option A was not universal with some participants expressing strong objections to the introduction of any measures to cut through traffic in the area. In response to specific concerns raised, the Council has made a number of post-consultation changes to the proposed St Ann's LTN as well as proposed a number of exemptions to the traffic restrictions. Other concerns of those opposing the St Ann's LTN (Option A) are noted, particularly displacement of some motorised vehicular traffic to boundary roads, some lengthened journey times and potential increased air pollution on boundary roads. However, by taking a phased implementation of delivering the School Streets, pedestrian crossing facilities and bike hangars first and monitoring the impact of these, potential traffic displacement mitigation

measures can be better identified and deployed, in conjunction with any changes within the St Ann's LTN, if necessary.

- 4.4 Introducing the St Ann's LTN is expected to result in the adjustment of motor vehicle travel behaviour of both those living within the LTN and those living outside. Some drivers will adjust routes and behaviour to avoid the St Ann's LTN area, switch to walking, cycling or public transport or even reduce the number of journeys. The proposed St Ann's LTN will contribute to reducing through-traffic in the area; it will also help encourage residents who currently make trips by motor vehicle to switch some local journeys to more sustainable travel modes. A substantial proportion of locally-generated motor vehicle trips (i.e. by Haringey residents) are short. TfL data indicates that over 60% of such trips (accounting for those that are essential/cannot be made by other means, e.g. due to a physical or other disability) could be made by cleaner, more sustainable modes. By making some local motor vehicle trips slightly less attractive (e.g. slightly longer due to restrictions in certain places) and walking/cycling much more attractive (by reducing dominance of vehicle traffic on these streets), a switch from the former to the latter will be encouraged.
- 4.5 Transport is the third largest source of emissions in the borough yet less than half of Haringey households have access to a car or van and this figure is falling. Census data from 2011 shows that household access across the area to cars or vans is low. 60% of households in St Ann's ward, 62% of households in Harringay ward and 65% of households in Tottenham Green ward do not have access to a car or van. This means that the majority of households in the area do not benefit from the large amount of space on the public highway which currently enables rat-running traffic.
- 4.6 A range of assessments have been carried out to understand the potential impacts of the proposed St Ann's LTN. The Equalities Impact Assessment (EqIA) showed that the measures are likely to advance equalities for many protected groups, albeit with a small disadvantage noted for those solely reliant on motor vehicles for transport. On balance, the scheme is considered to promote equality of opportunity among protected groups.
- 4.7 Under the Traffic Management Act 2004, Haringey Council has a 'network management duty' under section 16 in its capacity as local traffic authority. In simple terms the duty is to secure "the expeditious movement of traffic including pedestrians on the authority's road network".
- 4.8 A high-level transport assessment was prepared for the St Ann's LTN which predicted a reduction in motorised vehicular traffic within the proposed St Ann's LTN area and a range of potential impacts on motorised vehicular traffic (from negative/neutral to 100%+ increase) on certain parts of the boundary roads and

at certain times. However, it should be noted this is only a prediction and was based on the worst-case assumption that all motorised vehicular traffic reassigned to the nearest available route and assumed that the boundary roads are able to accommodate additional motorised vehicular traffic. There are varying levels of spare capacity in those boundary roads. Early reviews by Sustrans of 6 trial LTNs across London have shown a general reduction in traffic over time within the LTNs with a mixed picture for the boundary roads. It is only possible to accurately understand impacts of the proposals on the highway network once the scheme is in place. The scheme is proposed to be implemented on a trial basis, supported by a comprehensive monitoring programme covering traffic flows and pedestrian flows, bus journey times, and emergency response times, and air quality. It should be noted that 'traffic' includes motorised and non-motorised travel modes and it is considered that the Council would not be in breach of its network management duty in implementing the St Ann's LTN, provided that it is phased appropriately, including having regard to other LTNs being taken forward by the Council (Bounds Green and Bruce Grove/West Green) and considering possible mitigation measures to counter the extent of negative impact on its boundary roads.

- 4.9 The Department for Transport's statutory guidance on the Traffic Management Act 2004: network management to support recovery from COVID-19 (last updated 30 July 2021) sets out that, following the pandemic, local authorities are expected to continue to reallocate road space to people walking and cycling including through measures such as modal filters which can create low-traffic or traffic-free neighbourhoods.

## **5. Alternative Options Considered**

- 5.1 The alternative options available to the Council are:

Option 1: Implement an alternate design for the St Ann's LTN. Engagement Stage 3 included public consultation on two LTN Options (Option A and Option B). Implementation of Option B is not recommended as it was not supported by respondents in the public consultation (compared with Option A which was strongly supported) and it also would not eliminate through traffic in the St Ann's area and consequently would not deliver the same benefits as Option A

Option 2: Implement the St Ann's LTN in a geographically-phased way – i.e. segmenting the area into discrete parts. Although this would enable the funding currently available to be used to implement full LTN measures in one or more parts of St Ann's (e.g. from Green Lanes to Black Boy Lane, from Black Boy Lane to Avenue Road and from Avenue Road to Seven Sisters Road), the effect

would merely be to temporarily displace north-south through-traffic to slightly fewer roads within the overall St Ann's LTN and therefore exacerbate the problems currently experienced on those roads, particularly by their residents. However, the selection of which parts to proceed with and which ones should be deferred until sufficient funding was available would be arbitrary and, for the most part, would represent a slight variation of Option B. Furthermore, additional cost would be incurred in creating any such discrete parts, delaying the rate at which the full St Ann's LTN could be created.

Option 3: Not to implement an LTN in St Ann's i.e. 'Do Nothing'. This option is discounted as it would not: reduce pollution; reduce motor traffic collisions; reduce carbon emissions; reclaim neighbourhood streets for pedestrians and communities; support active travel modes and therefore improved health outcomes; address inequalities with impacts felt disproportionately by those who do not own a car.

## **6. Background**

### **Strategic context**

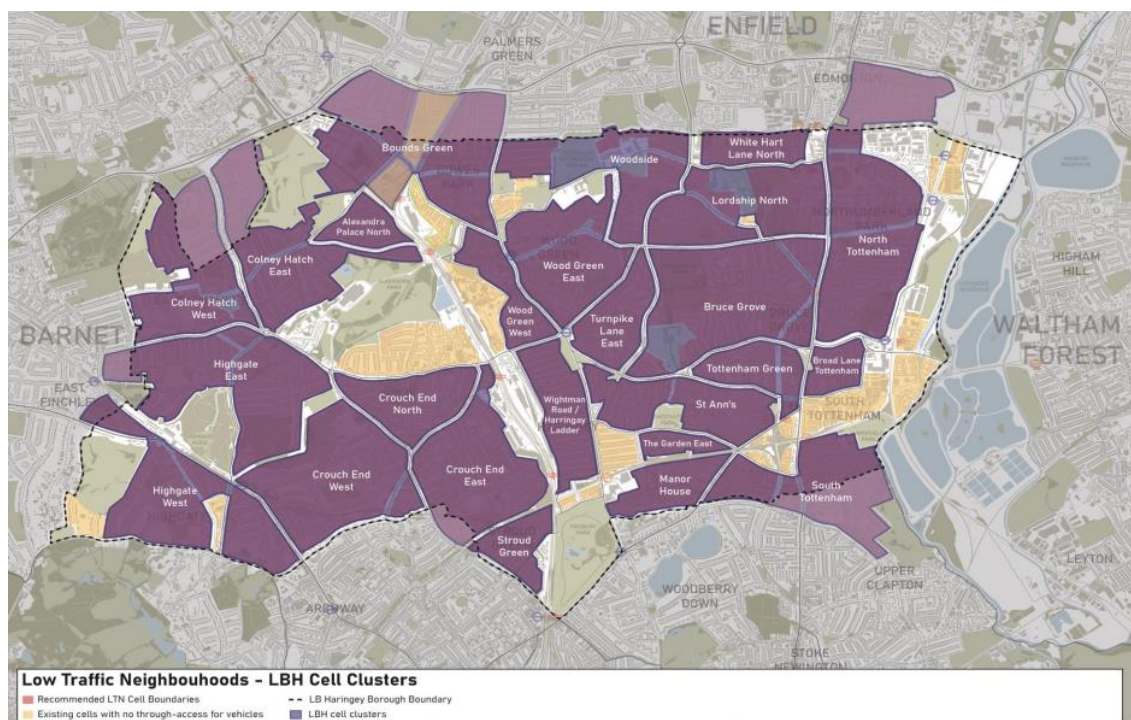
- 6.1 The strategic context for the scheme is provided by the Borough Plan, Transport Strategy, Climate Change Action Plan, Air Quality Action Plan, School Streets Plan, and draft Walking and Cycling Action Plan (WCAP). These are summarised in Appendix A.
- 6.2 The draft WCAP sets out a range of schemes that will form the basis of an emerging high-quality network in Haringey making walking and cycling natural choices including Low Traffic Neighbourhoods.

### **Low Traffic Neighbourhoods**

- 6.3 Low Traffic Neighbourhoods (LTNs) are area-based traffic management schemes that aim to reduce or remove non-residential motor traffic from residential areas, as well as reduce the number of short trips made by vehicles which could be walked or cycled. A range of measures are usually introduced as part of LTNs which work together to make it more difficult for motor traffic to travel through an area, meaning it is only trips originating from local addresses or delivery and service vehicles that can be made. Measures that are normally introduced in LTNs include one-way streets, banned turns and features called modal filters where roads are closed to motor traffic (at one end or in the middle) removing the ability of non-local traffic to drive along a street. Modal filters can be either be in the form of physical barriers or roads left open for access by permitted vehicles such as emergency services which, in some cases, are enforced via CCTV.

6.4 The draft WCAP, published for consultation in November 2021, includes Policy 4 to deliver a network of LTNs across the borough. It sets out that Haringey will develop a borough-wide vision for LTNs, taking into account the function of the street network, the availability of through routes and the location of key destinations in the borough. As a starting point towards a borough-wide network of LTNs, the draft WCAP identifies 25 potential LTN locations as set out in Figure 1.

Figure 1: Potential Low Traffic Neighbourhoods



6.5 St Ann’s is included as one of 25 potential LTN locations in the draft WCAP. An LTN in this location is consistent with the ten criteria listed in the document for defining and determining locations for LTNs. These include potential for reduction in traffic volumes and vehicle speeds, more walking and cycling, schools and community engagement.

### Issues

6.6 Over past decades, there has been a significant increase in traffic volumes on residential streets, resulting in greater noise, air pollution and road danger. This has been made worse by the introduction of sat nav apps which lead increasingly to more traffic passing through residential areas. At the same time, car ownership across London has been falling. The 2011 Census indicated only 48% of households in Haringey had access to a car or van. A Centre for London report<sup>1</sup> published in 2020 indicated that figure has now fallen to 43%. A large



portion of traffic on Haringey's residential roads is from vehicles which have not originated from or are not destined for the borough.

- 6.7 LTNs are a key tool available to councils to help reduce traffic volumes not only on residential streets but across their areas more generally. While LTNs are a traffic intervention, their potential benefits primarily relate to public health. Where LTNs are implemented successfully and remove traffic, they can deliver improved air quality, provide for cleaner, healthier, safer and more pleasant routes to schools and other destinations, enable streets to be reclaimed for play and community interaction and, in so doing, support increased physical activity and improve health and wellbeing.
- 6.8 During the height of the Covid-19 lockdown, London witnessed how creating more space to walk and cycle can reduce traffic and improve air quality. Traffic on streets reduced dramatically and, in turn, London's toxic air pollution improved in many areas<sup>1</sup>. Less traffic on our streets created safer, quieter streets and improved the experience for walking and cycling.
- 6.9 The major effect of introducing an LTN is that it alters vehicle travel behaviour. In particular, LTNs are a key tool to eliminate through-traffic (i.e. traffic that does not have an origin or destination within the LTN). The implementation of an LTN requires drivers who would ordinarily travel through the LTN to adjust their behaviour, either by taking an alternative route, switching to walking, cycling or public transport or even reducing the number of their journeys. LTNs can also require drivers living within the LTN area to alter their travel behaviour. While every home in an LTN can be accessed by car and can receive deliveries and services to their doors, it is the case that some residents and business visitors may have to drive further or use a different road to access their address.

#### Traffic reduction versus traffic displacement

- 6.10 A key point of contention is whether LTNs lead to an overall reduction in traffic (i.e. 'traffic reduction') or whether they just displace it from one location to another. It is impossible to predict how people will change their travel behaviour as a result of an LTN. However, evidence from other schemes in London shows that the changes in traffic volumes on boundary roads are very different to what would be predicted by simple reassignment of traffic. A paper<sup>2</sup> examining over 70 case studies of road space reallocation from eleven countries, and the collation of opinions from over 200 transport professionals worldwide, found that predictions of traffic problems are often unnecessarily alarmist, and that, given appropriate local circumstances, significant reductions in overall traffic

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<sup>1</sup> [https://www.london.gov.uk/sites/default/files/london\\_assembly\\_environment\\_committee\\_-\\_air\\_quality\\_report\\_-\\_february\\_2021.pdf](https://www.london.gov.uk/sites/default/files/london_assembly_environment_committee_-_air_quality_report_-_february_2021.pdf)

<sup>2</sup> [https://nacto.org/wp-content/uploads/2015/04/disappearing\\_traffic\\_cairns.pdf](https://nacto.org/wp-content/uploads/2015/04/disappearing_traffic_cairns.pdf)

levels can occur, with people making a far wider range of behavioural responses than has traditionally been assumed.

- 6.11 A particular concern is around traffic being displaced from the quieter residential areas onto surrounding main roads (often bounding the LTN) which could also be residential and may already be very congested. An analysis in Waltham Forest<sup>3</sup> found that, although traffic on major roads adjacent to LTNs increased slightly, it increased less than traffic in London as a whole during this period. Traffic decreased by 56% over the whole (both inside and outside the LTN) with 10,000 fewer vehicles a day across the project area. A study<sup>4</sup> by Kings College on Waltham Forest in 2019 found that air quality did not get worse on major roads (or other non-LTN areas) after the introduction of LTNs. A related concern is that increasing traffic on boundary roads is likely to disproportionately affect more deprived residents and those with protected characteristics. A spatial analysis of London's new LTNs<sup>5</sup> has shown that, across London, people in deprived areas were much more likely to live in a new LTN than people in less deprived areas and that, at a micro-level, LTN residents were demographically similar to neighbours in immediately adjacent areas.

#### Short-term versus long-term impacts

- 6.12 Another issue with LTNs concerns short-term versus long-term impacts. It can take time for drivers to get used to changes which can be disruptive in the short-term after an LTN is implemented. There may be some increase in driver queues at some main road junctions at certain times of the day which can initially lead to intermittent delays to bus services. However, experience from 6 other LTNs introduced in London has shown that, after a few months of a 'settling in' period, impacts on a majority of main roads tended to not be significant (see Appendix H). The growing body of data on LTN impacts in London has revealed a wide spectrum of impacts from large and small increases and decreases in traffic to insignificant changes either way.

#### Access to properties

- 6.13 As noted above, every property in an LTN can be accessed by car but it is the case that some residents and visitors may have to drive further or use a different road to access the address. This raises a variety of potential issues including for businesses, religious institutions, people with disabilities, taxis and private hire, emergency services, and general permeability and accessibility of communities. To a large extent, potential impacts depend on how an LTN is

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<sup>3</sup> <https://www.enjoywalthamforest.co.uk/work-in-your-area/walthamstow-village/comparison-of-vehicle-numbers-before-and-after-the-scheme-and-during-the-trial/>

<sup>4</sup> [https://www.walthamforest.gov.uk/sites/default/files/WalthamForest\\_Kings\\_Report\\_310718.pdf](https://www.walthamforest.gov.uk/sites/default/files/WalthamForest_Kings_Report_310718.pdf)

<sup>5</sup> <https://osf.io/preprints/socarxiv/q87fu/>

planned and designed and the extent of engagement and consultation which is undertaken.

### Businesses

- 6.14 LTNs may mean that access to certain businesses by motor vehicle is affected. This has implications for businesses who some people visit by car, those that rely on motor vehicles for deliveries, and for businesses directly related to motor vehicles such as MOT garages. Issues in this regard are partly mitigated by the fact that all businesses in an LTN are still able to be accessed by car. It is important to note that there are evidenced benefits to businesses from increased levels of walking and cycling<sup>6</sup>. People who walk and cycle more take more trips to the local high street over the course of a month. On average, pedestrians make 16 visits, cyclists 12, and car drivers 8. On average, over a month, people who walked to their local high street spent 40% more.

### Community facilities

- 6.15 LTNs may also affect access to community facilities such as religious institutions. Again, issues in this regard are partly mitigated by the fact that all addresses in an LTN are still able to be accessed by car. It is also the case that such facilities become more attractive to walk and cycle to because of the reduction in traffic within the LTN. Notwithstanding this, it is noted that not all people are able to walk and cycle to such facilities and changes in vehicular access may present some difficulties.

### Older people and people with disabilities

- 6.16 A key issue with LTNs is that they have the potential to impact disproportionately on individuals and groups who experience barriers to walking, cycling and using public transport and who rely on a motor vehicle to get around. Specific groups who may be presented with difficulties by LTNs include older people and people with disabilities. People and groups who rely on motor vehicles may also be more affected such as those who have carers or who use transport services such as special educational needs and disabilities (SEND) transport. LTNs do not prevent anyone driving to their home or to a particular address as all addresses remain accessible. It is also worth noting that disabled people also walk and cycle therefore their needs will differ to those who use a motor vehicle to get around. .
- 6.17 Each person with disabilities has different needs and they cannot be treated as one homogeneous group. A report by Transport for All set out that the positive

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<sup>6</sup> <https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>

impacts of LTNs experienced by different people with different disabilities included: easier and more pleasant journeys, increase in independence, decrease in traffic danger and benefits to physical and mental health. The negative impacts included: longer journey times for residents and visitors, travel becoming more exhausting, complicated or difficult and some cases of a negative impact on mental health, issues with taxis and a perceived rise in traffic danger. It is crucial that the needs and requirements of these individuals and groups are properly taken into account as part of the design process of an LTN,

### Taxis & private hire

- 6.18 The traffic restrictions introduced by LTNs can mean that taxi and private hire vehicles may have to drive further or use a different road to access certain addresses. Taxi/private hire journeys could be more difficult or take longer with more expensive fares as a result. To the extent this is the case, LTNs may have potential impacts for both taxi drivers and taxi passengers. Impacts could fall disproportionately upon groups who cannot use other transport options and thus rely on taxis/private hire vehicles to make certain trips. It is noted that a large portion of London black cabs are wheelchair-accessible vehicles and these vehicles, together with fully accessible private hire vehicles, provide a valuable option for travel, particularly to elderly or disabled people. It is important that the needs and requirements of all road users are taken into account when designing LTNs.

### Emergency services

- 6.19 A common concern about LTNs is that they have potential to slow down emergency services, either through blocking routes within the LTN or creating greater congestion outside of it. The ability of emergency services to efficiently use the highway network is a genuine factor that must be taken into account with LTNs. It is important that emergency services are extensively consulted as proposals develop and that their vehicles are provided with necessary accesses. A common way to do this is to use camera enforced filters rather than physical barriers as filters. Data from long-standing LTNs have shown that there is no negative impact on emergency response. In Waltham Forest, Fire Brigade response times were unchanged inside LTNs, and slightly faster on boundary roads<sup>7</sup>.

### Exemptions

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<sup>7</sup> <https://findingspress.org/article/18198-the-impact-of-introducing-a-low-traffic-neighbourhood-on-fire-service-emergency-response-times-in-waltham-forest-london>

- 6.20 One tool which is available to councils is to issue exemptions to certain road restrictions within an LTN. This relies upon some modal filters being camera-enforced rather than enforced through physical barriers. This is commonly done across London for a variety of purposes. Some people in Haringey are eligible to apply for exemption for a free School Streets exemption including Blue Badge (disabled) holders who require access to the street during the specified times and pupils of the school that have a disability that prevents them from walking or cycling to school.

#### Accessibility for communities

- 6.21 The permeability and accessibility of communities can be affected by the introduction of an LTN – whilst accessibility for cars is reduced (but not removed), accessibility for pedestrians and cyclists is increased. It may be the case that vehicular access is restricted to some communities to remove harmful through-traffic which does not have an origin or destination in the local area. While this may mean some residents and visitors may have to drive further or use a different road to access the community, accessibility by public transport can be retained and enhanced through appropriate choices of filters such as bus gates. Accessibility and permeability for pedestrians and cyclists can also be significantly improved through the removal of through traffic. A study in Bristol<sup>8</sup> found the number of friends and acquaintances reported by residents was significantly lower on streets with higher volumes of motor traffic.

#### Community safety

- 6.22 A further concern around LTNs is that if traffic is reduced and streets are quieter there is a risk of more crime/anti-social behaviour, including with regard to violence against women and girls. The introduction of an LTN in Waltham Forest was associated with a 18% decrease in street crime within the LTN and 10% across the borough and this effect increased with a longer duration since implementation<sup>9</sup>. It is nevertheless important that LTNs are designed with a view to designing out crime through approaches such as Secure by Design and that the Metropolitan Police Service is engaging robustly and as early as possible.

#### **External funding**

- 6.23 In usual times, London Boroughs are allocated money by Transport for London (TfL) to spend on projects that support the Mayor's Transport Strategy through a Local Implementation Plan (LIP). The Council's LIP 2019-2022 was approved by the Deputy Mayor for Transport in June 2019. However, the LIP funding

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<sup>8</sup> <https://core.ac.uk/download/pdf/323897729.pdf>

<sup>9</sup> <https://osf.io/preprints/socarxiv/ftm8d/>

programme was suspended in May 2020 due to financial constraints on TfL, resulting from reduced revenue during lockdown, a government funding agreement and a need to reprioritise any spending. This was to help active and safe travel whilst the public transport system could not operate at full capacity due to social distancing.

- 6.24 In June 2020, TfL invited London boroughs to bid for funding under the Mayor’s London Streetspace Programme which aimed to provide residents with a safe alternative to travelling in the capital (Tranche 1). Haringey was successfully awarded funding for a range of proposals outlined in the Haringey Streetspace Plan (Appendix B); however, a bid to deliver two LTNs (Bruce Grove and St Ann’s) (Appendix C) was unsuccessful.
- 6.25 In July 2020, TfL announced a further Department for Transport Active Travel Fund funding opportunity (Tranche 2). The Council resubmitted unsuccessful Tranche 1 bids together with a new bid for an LTN in Bounds Green in response to an LTN being implemented in Enfield. In December 2020 TfL confirmed the Council had been successful with its three LTN bids. It should be noted that the Tranche 1 LTNs (none in Haringey) are different from the Tranche 2 LTNs that the Council has been awarded funding to deliver. In Tranche 1 funded LTNs were required to be delivered without delay with consultation taking place whilst they were in place. In contrast, the Tranche 2 LTNs are expected to be consulted on before implementation.
- 6.26 In June 2021, TfL announced a further funding opportunity (Tranche 3) focused on defined priorities. In July 2021, the Council was allocated £927,000 towards its three in-flight LTN schemes comprising £735,000 for School Streets, £72,000 for cycle hangars and £120,000 for transport modelling.

Table 1: External funding secured towards delivery of LTNs

Tranche	Funding secured		Deadline for committal	Deadline for spend
	3 x LTNs total	St Ann’s LTN		
Tranche 1		None	N/A	N/A
Tranche 2	£866k	£302k including initial allocation of £60k for community engagement and design.	11 March 2022	30 September 2022

Tranche 3	£927k	£184k for two School Streets £24k for cycle hangars	11 December 2021	11 March 2022 with works complete by 31 March 2022
Total	£1.793m	£510k		

## Engagement and Consultation

6.27 The development of proposals for the St Ann's LTN has been subject to a significant amount of engagement and consultation. The three main stages of engagement are set out below together with details of ongoing engagement with key stakeholder groups. A Communications and Engagement Plan (Appendix D) was prepared after Engagement Stage 1 with a long-term focus on building relationships with key stakeholders and has underpinned all engagement since.

### Engagement Stage 1 - Early engagement

6.28 The Council launched early engagement with residents and businesses on the proposed St Ann's LTN in February 2021. A letter was sent to all addresses within the proposed St Ann's LTN area explaining how to get involved with the emerging proposal and inviting residents and businesses to let the Council know what transport and travel issues they were experiencing, and what interventions or improvements they would like to see implemented in the proposed St Ann's LTN area. Residents were given the opportunity to share their views on an interactive engagement map and to join an online public meeting. For those without internet access, replying to the letter by phone and post was possible. Targeted meetings with schools in the LTN area, the emergency services and local disability groups were also carried out. The feedback received at this engagement stage was reviewed and analysed and fed into the initial design development of the St Ann's LTN.

6.29 A summary and analysis of the comments on the interactive online engagement is provided at Appendix E. 1,668 people visited the site and there were 521 confirmed respondents. The most common issue raised by respondents was 'traffic speeding' which was mentioned in 54% of comments and agreements, followed by 'poor cycling environment', 'traffic volumes' and 'rat running traffic'. The most common suggested improvements from respondents were 'reduce traffic volumes' which was mentioned in 48% of comments and agreements, followed by 'reduce traffic speeds', 'more cycle infrastructure' and 'increase traffic and speeding enforcement'. The key areas of concern identified from the comments were Clinton Road, Black Boy Lane (central and south), Avenue

Road, Hermitage Road (north) and the Glenwood Road/Avondale Road/Woodland Park Road (south) area.

- 6.30 A summary of written responses to participant questions at the online meeting is provided at Appendix F.

### Engagement Stage 2: Community Design Workshops

- 6.31 On 24 and 25 May 2021, the Council held online community design workshops for the proposed St Ann’s LTN. The public workshops were open to all residents in the project area. Letters were sent to all addresses in the area in advance and attendees were able to comment on two design options for their area and raise any potential issues or suggestions about the design. Option 1 included modal filters on all the north south through routes in the LTN. In Option 2, Black Boy Lane would remain open for southbound traffic. 102 people registered to participate in the events and 63 attended. Option 1 equivalent was the most popular among attendees. Further detail of the feedback received is provided in the consultation report at Appendix K.

### **Engagement Stage 3: Public Consultation**

#### How was consultation undertaken?

- 6.32 A public consultation on the proposed St Ann’s LTN ran from Monday 16 August to Friday 17 September 2021 (5 weeks). The public consultation was an opportunity for those living and working in and near the LTN to review two proposed design options (Option A and Option B) and give the Council their feedback. However, it is important to note that the public consultation was available to anyone to respond to, whether they lived in the area or not. The below table summarises strategies used to maximise engagement during the public consultation:

Council website	Consultation hosted on Council website where all key documentation published  FAQs
Social media	Twitter, facebook, instagram
Consultation leaflet	Sent to every address and available in local libraries
Haringey People Extra bulletin & Haringey Business Bulletin	LTN item included within email bulletins
Survey	Sent to every address (freepost return)



	Could also be completed online, via phone, sent via email or completed in person and deposited at 5 of the borough's libraries
Accessible version of consultation leaflet and survey	Published on the council's website with paper copies available on request.
Translations	Consultation leaflet available on request in 4 commonly spoken languages
Specific stakeholder groups	Bespoke strategies used for specific groups. Detail set out in following paragraphs.
Consultation events	Exhibition boards St Ann's Library  Pop-up exhibitions at Chestnuts Park and St Ann's Library  Outside school engagement: St Ann's Primary School, Chestnuts Primary School, West Green Road Primary School & Seven Sisters Primary School
Posters/lamp columns	25 lamppost wraps and 100 posters were placed across the LTN area

6.33 In addition to the main stages of engagement listed above the Council consulted key stakeholders on the emerging LTN proposals as follows:

- **Emergency services:** Three meetings took place with emergency services (police, ambulance, fire brigade) in 2021. In addition, there was correspondence outside of these meetings as draft designs emerged and evolved.
- **Disabled people and carers:** At the same time as Engagement Stage 2 design workshops were held the Council began collecting information to help it develop the LTN to meet the distinct requirements of people with disability and access needs. A Disabled People and Carers Survey was
  - launched on 10 May and ran until 1 September 2021. Key stakeholders were written to and informed about the survey to maximise the response rate. The Council worked closely with Disability Action Haringey (DAH) throughout the engagement process through a series of video calls and an online workshop.
- **Schools:** Schools engagement was carried out in July 2021. A meeting was held for head teachers and a separate meeting was held for parents.
- **Businesses:** A Business Perception Survey was commissioned to help build up a picture of how customers and staff travel to business premises, alongside how they receive deliveries.

What was consulted on?

- 6.34 Two LTN options were subject to public consultation (Option A and Option B) as set out in the consultation leaflet at Appendix G. Option A (equivalent to Option 1 at the Community Design Workshops) proposed filters on a trial basis to remove all through-traffic from the area (i.e. to eliminate all traffic travelling through the LTN from one boundary road to another), whilst Option B (equivalent to Option 2 at the Community Design Workshops) proposed filters to remove some north-south movements and all east-west movement through the area but maintaining the existing through movements on Black Boy Lane, Cornwall Road and Avenue Road.
- 6.35 A range of complementary measures were also proposed including:
- School Streets for West Green Primary School and St Ann's CE Primary School (on a trial basis)
  - Three new zebra crossings (permanent)
  - Six new cycle hangars (permanent)

*High Level Transport Assessment (HLTA)*

- 6.36 Under the Traffic Management Act 2004, Haringey Council has a 'network management duty' under section 16 in its capacity as local traffic authority. The duty is "to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives—
- (a) securing the expeditious movement of traffic on the authority's road network; and
  - (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority."
- 6.37 As part of this duty, alongside the consultation option, the Council also published a high-level transport assessment (HLTA) for the proposed St Ann's LTN. The HLTA (Appendix H) was undertaken to assess the potential impacts of the proposed St Ann's LTN on the highways network. It concluded that Option B which retains north-south movements with the LTN area would see little or no impact on the wider transport network and focused on Option A which would remove all through-traffic from the area.
- 6.38 The HLTA estimates, based on limited data, that if Option A is introduced, it will stop approximately 20,000 motor vehicles in a 12-hour period (7am-7pm), from traveling through the LTN, representing approximately 70-75% of motor traffic within the LTN area during that period. The HLTA assumes that capacity exists on the main roads surrounding the LTN (boundary roads) and so motor traffic can divert onto these and possibly beyond as it seeks alternative routes. The HLTA therefore shows a significant increase in motor traffic on surrounding

main roads such as Green Lanes and West Green Road. However, the HLTA presents a “worst-case scenario” and assumes that, with the LTN in place, people will continue driving exactly the same journeys as they did previously, but merely divert to the closest route available. That, in reality, will not materialise as Green Lanes and several of the other boundary roads are already close to capacity and would not be able to accommodate this increase in demand. As a result, some drivers will attempt to use these boundary roads and generate additional traffic pressure in the short-term but are expected to quickly re-route their journeys further afield or otherwise change their travel behaviour.

- 6.39 Notwithstanding this conclusion, the HLTA points to evidence from other LTN schemes across London shows that, after 6 months, significant behaviour change takes place, mitigating the increase in demand on boundary roads. Sustrans data on 21 boundary roads indicates a mixed picture following LTN implementation. On average, daily traffic volumes on boundary roads increased by 3% compared to before the trial. In the worst case, daily traffic flow on one boundary road increased by 32%. In the best case, daily traffic flow on one boundary road saw a reduction of 31%.
- 6.40 The HLTA also considered the potential impact if the LTN was implemented alongside the Bruce Grove West Green LTN which the Council is also proposing. This showed that, if both schemes are implemented at the same time with Option A for St Ann’s, the impacts on West Green Road may reduce, with motor traffic reassigning onto the wider network before it reaches the St Ann’s area. Irrespectively, the implementation of the St Ann’s LTN significantly curtails north-south movement and thus makes the use of Downhills Way and Belmont Road in the Bruce Grove/West Green LTN less attractive as a peak hour travel route.

#### *Equalities Impact Assessment (EqIA)*

- 6.41 The EqIA (Appendix I) assessed the likely impacts of the proposed St Ann’s LTN and complementary measures on groups with protected characteristics as defined by the Equality Act 2010 as well as a number of other marginalised groups. The measures are considered to advance equalities for many protected groups, albeit with potential negative impacts for those reliant on motor vehicles for transport whose journeys may be different or take longer.

#### What was the response to the consultation?

- 6.42 The consultation ran for 5 weeks from 16 August 2021 to 17 September 2021. In total 1,078 people responded to the consultation – 1,007 via the online survey

and 71 via paper surveys. A copy of the survey is provided at Appendix J. There were also 28 emails received providing feedback.

- 6.43 A consultation report is provided at Appendix K. A summary of respondents and responses is provided below.

#### *Respondents*

- 6.44 69% of responses were received from people who live within the St Ann's area. 5% of responses came from participants located on one of the boundary roads.
- 6.45 15% of the respondents said they have a physical or mental health condition/illness.

#### *Feedback*

- 6.46 When asked how they felt about the Council proposing to reduce traffic within the St Ann's LTN area, 68% of respondents gave a positive response (734 people) while 25% responded negatively (266 people).
- 6.47 Of the two consultation options, Option A received a significantly more positive response than Option B. 62% of respondents were positive about Option A with 32% negative. 34% of respondents were positive regarding Option B and 43% were negative.
- 6.48 Those who expressed a positive view regarding Option A highlighted key themes behind their support as follows: reducing through traffic and speed of vehicles including outside schools; improvements to air quality; and improvements in cycling safety. The main themes in opposition were displacement of traffic to boundary roads with added journey times and increased pollution.
- 6.49 Of those that supported Option B, the key themes behind this were less congestion on boundary roads, lesser impact on the highway network as demonstrated by the HLTA and lesser impact on journey times. The primary theme that emerged from those who opposed Option B was that it did not achieve the proposed objectives of an LTN and retained three, heavily used, north to south corridors between West Green Road and St Ann's Road.
- 6.50 There was high positivity for the proposed complementary measures of crossings, School Streets and bike hangars. Proposals for School Streets were widely welcomed, even among some individuals who were not supportive of proposals for an LTN intervention in the St Ann's area.

- 6.51 42 responses were received to the Disabled People & Carers survey from people within the St Ann's area. 19 provided comment on the proposals for an LTN in St Ann's. 15 of these participants (79%) expressed negative sentiment about the prospect of a St Ann's LTN. The most common themes raised by those expressing a negative view were that the St Ann's LTN would make the area inaccessible to disabled residents and to individuals, including carers, who visit them and that it would result in additional congestion and traffic and a deterioration of air quality.

*Responses from emergency services*

- 6.52 The Metropolitan Police responded stating it has no objection to the proposals. It suggested that it would like the Council to consider changing certain physical filters (i.e. hard closures) to camera enforced filters. No formal consultation response was received from the Police's Secure by Design department, however the Council met with their officers to seek their views on the proposals.
- 6.53 The London Fire Brigade expressed concerns about hard closures stating that an approach that does not require physical barriers would be advantageous. It said that more detail was required about layouts to ensure that it does not impede on its appliances.
- 6.54 The London Ambulance Service (LAS) stated that it supported measures to improve public health by reducing traffic and encouraging walking and cycling but stressed the importance of ensuring that emergency vehicle access is properly considered in all LTN schemes. The LAS indicated a preference that, where possible, hard closures (i.e. physical barriers) are avoided and soft closures (i.e. camera enforced filters) are used instead. It was also requested that any subsequent traffic management order has appropriate exemptions for ambulance, fire and police purposes. For St Ann's LTN the LAS expressed a preference for consultation option B and highlighted routes on Black Boy Lane, Cornwall Road and Avenue Road as essential to aid emergency vehicle progression through the area. Clarification was sought about the type of filters in both consultation options.

*Responses from businesses*

- 6.55 123 responses were received across the borough to the Council's Business Perception Survey. 77% of responses were from business owners/managers and 22% from employees. The survey revealed that there is a wide spread of ways in which businesses carry out loading/deliveries/collections of goods. The most common response to this question was that loading/deliveries/collections of goods are carried out six days a week (19%), closely followed by seven days a week (17%). When asked about how many deliveries they received per day,

the most common response was one delivery per day (29%), followed by two deliveries by day (19%). In response to the question about what mode of transport business deliveries arrive by, the most common response was by van (38%), closely followed with by HGV/lorry (36%). After this, the third most common response by respondents was by car (22%). Respondents were then asked where they currently load their goods from, and answered this question with a spread of answers, including at the front of their shop, on a side street, and at the back of their shop.

- 6.56 When asked to select the top three means by which their staff currently travel to the business premises, the most common response was by car (36%), closely followed by public transport (32%). Another popular response by respondents on how they travel to the business premises was by walking (20%). In response to the question about how customers travel to the respondents' businesses, the most common response was by walking (32%), followed by car (29 per cent), and by public transport (22%). When asked how supportive they were of efforts to improve walking and cycling infrastructure in their local area, a mixed picture emerged. Participants were asked to provide an indication of how supportive they were on a five-point Likert scale, in which 1 = not supportive at all, 5 = very supportive. The most common response respondents gave was five, (30%). After this, the most common response was three (25%), followed by one (19%).

#### Summary of Council response to consultation

- 6.57 The proposed St Ann's LTN has been developed over 10 months informed by a significant amount of engagement with local residents and other key stakeholders. In early 2021, the Council began early engagement with residents and businesses on the proposed St Ann's LTN. The most common issue raised by respondents was 'traffic speeding' followed by 'poor cycling environment', 'traffic volumes' and 'rat-running traffic'. The most common suggested improvements from respondents were 'reduce traffic volumes' followed by 'reduce traffic speeds', 'more cycle infrastructure' and 'increase traffic and speeding enforcement'. Following this, a series of LTN design proposals were developed to help address the concerns raised. Engagement was carried out on these in May 2021 via online Community Design Workshops. Public consultation was held on two options (Option A and B) as part of Engagement Stage 3.
- 6.58 Based on the quantitative and qualitative data received as part of the consultation, there was strong support among participants for the introduction of the St Ann's LTN. A clear preference was expressed for Option A which removes all through traffic from the area. Those who were in support of Option A wanted to see measures introduced that reduce through traffic in the area to

create a quieter and safer environment within the St Ann's with improvements to air quality and improvements in cycling safety.

- 6.59 It is noted, however, that support was not universal with some participants expressing strong objections to the introduction of any measures to cut through-traffic in the area, based on the perception traffic will be displaced and result in negative impacts on boundary roads and surrounding areas. The ultimate goal of the St Ann's LTN is to reduce traffic both within the St Ann's LTN and on the boundary roads of the St Ann's LTN. Data from trial LTNs implemented in boroughs such as Hackney, Lambeth and Islington has shown a mixed picture regarding traffic reduction. Traffic volumes within the LTNs reduced substantially. Although traffic on a few boundary roads increased, after a settling in period, traffic volumes on the majority of boundary roads has tended to remain static or in some cases decreased. With regards to concerns about increased journey times, evidence suggests that traffic volumes and congestion tend to decrease across a neighbourhood when an LTN is introduced. Residents within the St Ann's LTN may need to drive slightly further to reach some destinations, but one of the aims of LTNs is to encourage residents to drive shorter journeys less frequently, and instead make short trips by walking and cycling more often. In terms of concerns about air pollution on main roads, evidence from Waltham Forest<sup>10</sup> has shown air quality to improve on main roads after LTNs are introduced.

### **Conclusion**

- 6.60 It is not possible to predict exactly what the impacts of the proposed St Ann's LTN will be. The HLTA predicted a reduction in motorised vehicular traffic within the proposed St Ann's LTN area and a range of potential impacts (from negative/neutral to 100%+ increase) on certain parts of the boundary roads and at certain times. However, it should be noted this is only a prediction and was based on the worst-case assumption that all motorised vehicular traffic reassigns to the nearest available route and assuming the boundary roads are able to accommodate additional motorised vehicular traffic.
- 6.61 From a network management perspective, the HLTA suggests that the implementation of the St Ann's LTN in isolation would have a negative impact on the "expeditious movement of traffic" on the likes of Green Lanes and West Green Road. There will inevitably be a period of adjustment of traffic routes selected by motorised vehicle users that can no longer rat-run through the LTN and the adjacent potential Bruce Grove/West Green LTN. However, in reality, there is insufficient spare capacity on the likes of Green Lanes and West Green Road to accommodate the scale of increased traffic suggested by the HLTA so

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<sup>10</sup> [https://www.walthamforest.gov.uk/sites/default/files/WalthamForest\\_Kings%20Report\\_310718.pdf](https://www.walthamforest.gov.uk/sites/default/files/WalthamForest_Kings%20Report_310718.pdf)

traffic will divert to alternative routes, resulting in a subsequent stabilisation of traffic movements and route selection.

- 6.62 A separate Cabinet report has been prepared recommending the implementation of the Bruce Grove West Green LTN as part of the Council's wider LTN delivery programme. The HLTA considered the potential impact if the LTN was implemented alongside the Bruce Grove West Green LTN. This showed that, if both schemes are implemented at the same time with Option A for St Ann's, the impacts on West Green Road may reduce, with motor traffic reassigning onto the wider network before it reaches the St Ann's area. Irrespectively, the implementation of the St Ann's LTN significantly curtails north-south movement and thus makes the use of Downhills Way and Belmont Road in the Bruce Grove/West Green LTN less attractive as a peak hour travel route.
- 6.63 Having regard to the public support for the St Ann's LTN (Option A) and the potential for the LTN to deliver significant benefits such as reducing traffic, reduction in injury risk, reduced air pollution and increases in active travel, and taking account of the Equalities Impact Assessment, which indicates potential for net positive benefits for those with protected characteristics, it is recommended that the Option A LTN is implemented which will completely remove through traffic from the St Ann's LTN area. The recommendation is for a trial scheme which, if necessary, the Council can make changes to while it is in force to address or mitigate some of the issues arising that affects the highway network or local amenities and with a linked commitment to comprehensive monitoring to be set out in a detailed monitoring proposal document. Having regard to public support for the suggested complementary measures as well as their potential to support the Council's aims for the LTN and wider area it is also recommended to introduce the complementary measures. Monitoring will be established before the trial goes live such that there is a robust data baseline and will include ongoing monitoring of traffic (all types) and air pollution within the St Ann's LTN, on major boundary roads including outside schools and elsewhere at key locations on the borough's road network.
- 6.64 Having regard to consultation feedback and further dialogue with key stakeholders, limited changes are proposed to the experimental St Ann's LTN and complementary measures that are proposed to be implemented. The key change is set out below:

Table 2 Post-consultation design change to St Ann's LTN (Option A)

Key post-consultation changes	Reason for change
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<p>St Ann's Primary School school street to be extended to cover part of Seven Sisters Primary School with a new timed school street filter added to South Grove north of junction with Oulton Road. This additional filter is only necessary if the School Streets are approved but not the LTN filters or the school street is implemented well in advance of the LTN filters should both be approved.</p>	<p>To protect the narrow section of South Grove outside Seven Sisters Primary school from motor traffic which currently travels along Avenue Road where a school street filter is now proposed at the junction with St Ann's Road.</p>
<p>Filter on Oulton Road at junction with South Grove removed. Retain existing traffic arrangement on Oulton Road and Cissbury Road.</p>	<p>To simplify the scheme and make it easier for local residents to access the area.</p>

- 6.65 After the consultation closed the Council met with the emergency services to discuss their responses. Clarification was provided that the filters proposed on Black Boy Lane, Cornwall Rd and Avenue Rd as part of consultation Option A would all be emergency access filters thereby allowing north south movement through the St Ann's LTN for emergency vehicles.
- 6.66 A plan of the experimental Bounds Green LTN, School Streets and other complementary measures proposed for implementation is provided at Appendix L.

## Exemptions

- 6.67 Where roads are closed with a physical barrier, whether through use of planters, bollard, etc, no exemptions are possible for any motor vehicle. However, where they are signed as closed to motor traffic but not physically closed, the experimental traffic management order for the LTN will exempt all emergency vehicles and the Council's refuse services. These closures will likely be enforced by CCTV cameras.
- 6.68 Meeting the needs of those with access and disability needs has been an important part of the St Ann's LTN design process. Hearing the views from the community on these issues at online workshops, through the Disabled People and Carers survey and the public consultation has helped shape the design of the St Ann's LTN including the types/locations of filters and the locations of the new pedestrian crossings.
- 6.69 The EqIA (Appendix I) assessed the likely impacts of the proposed St Ann's LTN and complementary measures on groups with protected characteristics as defined by the Equality Act 2010 as well as a number of other marginalised groups. It found that the measures are considered to advance equalities for

many protected groups, albeit with potential negative impacts for those reliant on motor vehicles for transport whose journeys may be different or take longer

- 6.70 Having regard to this and feedback received from those with access and disability needs through Engagement Stage 3, careful consideration has been given to the case for the Council to provide certain exemptions for the proposed St Ann's LTN. The proposed St Ann's LTN maintains accesses to all properties within the LTNs, but routes taken to a given property may need to change. The benefits of not providing exemptions to the LTN are to provide the safest possible environment for people to walk, wheel and cycle by significantly reducing motorised traffic and to reduce as far as possible congestion and air pollution. However, feedback and evidence indicated that such an approach would potentially result in negative impacts for some people some of the time who have a protected characteristic, in particular for disabled people.
- 6.71 On the basis of the above, and to ensure the St Ann's LTN advances equality as far as possible, it is recommended that the following will be eligible for an exemption to non-hard closure filters in the St Ann's LTN experimental scheme:
- Blue Badge holders living within the St Ann's LTN or on the immediate boundary of it
  - Special Educational Needs and Disabilities (SEND) transport
  - Essential Haringey Council services catering for people with a disability
- 6.72 This is a carefully balanced recommendation taking into consideration the reasonable adjustments that this approach will offer to Blue Badge holders and others with access and disability needs.
- 6.73 The exemptions will be subject to an application process and exact criteria will follow in due course.
- 6.74 There will also be a separate route for individuals who do not live within the LTN or on the immediate boundary of it to obtain an exemption to drive through a designated filter, through an exceptional circumstance dispensation.
- 6.75 The above exemptions will not apply to the trial School Streets within the Low Traffic Neighbourhood. For the trial School Streets, the Council's approved School Streets Exemptions Policy will be applied.
- 6.76 Building on comprehensive engagement done so far to understand the potential impacts of the proposals on groups with protected characteristics the Council will continue to work with relevant organisations to ensure that as far as possible the St Ann's LTN advances equality. The Council will continue to engage with Transport for All whose recent report 'Pave the Way: The impact

of Low Traffic Neighbourhoods (LTNs) on disabled people, and the future of accessible Active Travel' is noted.

- 6.77 The Council will closely monitor the impacts of the trial St Ann's LTN, both through a comprehensive monitoring strategy and further engagement with the community and key stakeholders. Should this indicate impacts on groups with protected characteristics which need to be mitigated then the above exemptions list will be reviewed.

### **Updated EqIA**

- 6.78 The Council has prepared an updated EqIA in respect of the St Ann's LTN, School Streets and other complementary measures proposed for implementation. This is provided at Appendix M. The updated EqIA found that the proposals will advance equalities for many protected groups. It notes that some car journeys may be different or take longer, and thus become less convenient as a result of the proposals with potential negative impacts for those reliant on motor vehicles for transport. A range of mitigation approaches are set out for mitigating these impacts including making certain groups and categories of transport exempt from the some of the restrictions. However, it concludes that it the overall impact of the proposal that should be considered, with many benefits to the users, including those living and working across the scheme area. In order to achieve the multiple benefits of the proposals, including contributing to local and wider London mode-shift, some car journey impact may be seen.

### **Implementation of St Ann's LTN & complementary measures and Engagement Stage 4: public objection period**

- 6.79 The St Ann's LTN will be implemented via traffic management orders. These are legal documents which enable the Council, as the local traffic authority, to impose traffic and parking restrictions to manage traffic in the borough.
- 6.80 There are 3 types of traffic management orders:
- permanent
  - experimental
  - temporary
- 6.81 The St Ann's LTN and School Streets are proposed to be implemented via experimental traffic management orders.
- 6.82 Experimental traffic management orders (ETMOs) are schemes introduced as an experiment to see what its effects are and can be changed if necessary. They last up to 18 months before either being abandoned,

amended or made permanent. An ETMO can only stay in force for a maximum of 18 months while the effects are monitored and assessed. Formal objections to a subsequent order to continue the provisions of the ETMO in force indefinitely must be made in the first six months of the ETMO coming into force. If changes are made, six months are allowed for such an objection from the date those changes came into operation. A decision on whether the changes introduced will be removed or made permanent must be made within 18 months of an order coming into force.

- 6.83 During the period in which the ETMOs are in force, the Council can modify or suspend the operation of the ETMO if it appears essential in the interests of the expeditious, convenient and safe movement of traffic or for providing suitable and adequate on-street parking facilities, or for preserving or improving the amenities of the area through which any road traffic affected by the order runs.
- 6.84 During the period in which the ETMOs are in force, the Council will carry out **Engagement Stage 4: public objection period**. This will provide a further opportunity for the community and other stakeholders to provide feedback on the proposals. The Council will review all formal objections and feedback provided and this together with the comprehensive monitoring outlined above will inform whether any changes are necessary to the scheme while it is in force.
- 6.85 Notwithstanding the above, it should be noted that it will not be possible to resolve all issues which arise whilst the experimental measures are in place. In the first instance, it will be necessary for the Council to allow a 'settling-in' period for drivers to adjust their travel behaviour in response to the new highway arrangement. In the second instance, the Council will be limited in terms of what changes it can make and the scope of potential changes will likely only extend to slight adjustments to deal with minor localised issues. Lastly, it will not be possible to make immediate changes and, depending upon the nature of any changes required, these could take some time to implement. This is because any significant changes will require a revised experimental traffic management order and mean that the period of the experiment starts afresh. For this reason, it would not be prudent to consider any significant changes to the ETMO for the LTN for at least two months, given that it will take time for altered traffic behaviour and route selection to stabilise.
- 6.86 The decision as to whether or not to make the LTN and School Streets permanent will be subject to a separate decision by the Council.
- 6.87 The proposed bike hangars will be implemented by exercising powers under section 63 of the Road Traffic Regulation Act 1984.

- 6.88 The proposed pedestrian crossings will be implemented by exercising powers under section 23 of the Road Traffic Regulation Act 1984.

### **Phasing/programming and next steps**

- 6.89 The St Ann's LTN forms part of the Council's wider LTN programme. Two separate Cabinet reports have been prepared for the December 2021 Cabinet, recommending implementation of the Bruce Grove/West Green LTN and Bounds Green LTN respectively.
- 6.90 The three LTNs (St Ann's, Bruce Grove/West Green and Bounds Green) are all of a significant scale. Due to their scale and the resources available to implement them, it is not possible for the Council to implement them all at the same time. It is therefore necessary for the Council to take a phased/programmed approach to their implementation.
- 6.91 It is also the case that the delivery of all three LTNs at once might not be desirable having regard to the potential cumulative effects of the schemes and the implications for the Council's network management duty. It is prudent for the Council to carefully phase implementation of the LTNs to provide appropriate opportunity for the network to adapt to changes in driver travel behaviour and to avoid risks to the expeditious movement of traffic.
- 6.92 The only LTN of the three which is time-critical is the Bounds Green LTN. The implementation of the Bounds Green LTN is required to mitigate impacts of the Bowes Primary Area Quieter Neighbourhood LTN which has already been implemented within the London Borough of Enfield and is having negative impacts within the proposed Bounds Green LTN area. Taking account of the above, and the need to introduce the scheme to address existing harms with the borough, the Bounds Green LTN is programmed to be the first LTN delivered (estimated from early 2022).
- 6.93 With the funding that is currently available, it is proposed to progress the complementary measures for each of the 3 LTNs at the same time as the Bounds Green LTN. Once these have been implemented, the Council would then progress to implementing the St Ann's LTN and Bruce Grove West Green LTNs. The benefits of this programming are that it will allow a period for the highway network to adapt after the Bounds Green LTN is implemented and the introduction of the complementary measures relating to the St Ann's LTN and Bruce Grove West Green LTN take effect. The provision of the complementary measures in the latter two LTNs will not only enhance safety but begin to encourage modal shift ahead of the LTNs' implementation and the imposition of traffic restrictions for motorised vehicles. This programming will also enable the Council to take account of the emerging outputs of the Green Lanes Traffic

and Transport Study which will help determine whether any additional complementary measures are required ahead of the implementation of the LTN to mitigate the impact of the St Ann's LTN on Green Lanes and its environs.

- 6.94 In the interim period until implementation, the Council will undertake any further notification / consultation with local residents as deemed necessary.
- 6.95 Due to the significant scale of the St Ann's LTN itself, it will not be possible to implement all elements at one time. The filters which make up the LTN will therefore be implemented on a phased basis over a period of approximately one month. This process will be closely managed to ensure the effective operation of the highway network at all times.
- 6.96 The next steps for the St Ann's LTN and complementary measures are as follows:

**December 2021: Update**

- The Council will notify all previously consulted residents and businesses on the outcome of the consultation.

**Spring 2022: Implementation of complementary measures a**

- Cycle hangars and new crossings implemented as permanent measures
- School Streets implemented as trial changes under an experimental traffic management order
- Start of 6 months' statutory objection period for School Streets (Engagement Stage 4)

**Spring/Summer 2022: Trial implementation of LTN**

- Implementation of LTN filters
- Start of 6 months' statutory objection period for LTN (Engagement Stage 4)

**Autumn 2021 – Winter 2022: Monitoring**

- Ongoing monitoring of traffic volumes and speed, air quality, cycle volumes, traffic collisions.

**Winter 2022: Review**

- Review of feedback and monitoring data to consider whether to make the trial changes permanent.

**Spring 2023: Decision**

- Decision on whether to make the trial changes permanent.

**Spring 2023: Update**

- The Council will notify all residents on the outcome of the decision and the next steps.

## **7 Contribution to strategic outcomes**

- 7.1 The proposal to introduce the St Ann's LTN experimental scheme and complementary measures will support the 'Place' Priority of the Borough Plan 2019-23 including specific objectives to:
- increase the levels of physical activity across the borough
  - improve air quality, especially around schools
  - reduce CO2 by 40% before 2020 and begin the journey to reduce to zero by 2050
  - provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users
  - improve connectivity around the borough especially for pedestrians and cyclists
- 7.2 In addition, the scheme will support the delivery of key Council strategies including the Transport Strategy, Climate Emergency Action Plan, Air Quality Action Plan, School Streets Plan and emerging Walking and Cycling Action Plan as summarised in Appendix A.

## **8 Statutory Officers' comments (**

### **Finance**

- 8.1 The report requests Cabinet to approve the recommendation as set out in Section 3 of this report. TfL have allocated £1.793m for three LTN Schemes, including for Schools Streets, cycle hangars and transport modelling. The funding of this St Ann's LTN is set out as below
- 8.2 The estimated costs of delivering the St Ann's LTN exceed the available external funding and currently identified internal funding. The cost estimate for implementation may change once detailed design has been undertaken but, in any event, additional funding will need to be found to address the funding gap before the project can proceed.
- 8.3 As set out below, the St Ann's LTN is not proposed to be implemented until the 2022/23 financial year. The Council will seek to obtain further external funding towards the St Ann's LTN before the point of implementation. Having regard to the above, confirmation of funding for the St Ann's LTN will be subject to a future decision to be made regarding the 2022/23 financial year.
- 8.4 It is estimated that the School Streets can be delivered within the available external funding. The bike hangars will be delivered using available external funding plus a contribution from the £5.1m Haringey Strategic Community Infrastructure Levy (CIL) allocation towards Streetspace Plan Projects for

walking and cycling (approved by Cabinet on 8 December 2020) as part of the Council's Capital Programme. There is no external funding available for the proposed crossings so these are to be funded via the same CIL allocation.

Item for delivery	Estimated cost	Available funding	Funding status
St Ann's LTN	£376k	£302k Tranche 2 DfT Funding	Part funded
School Streets	£201k	£184k Tranche 3 TfL funding plus underspend from same Tranche for other School Streets	Fully funded
Bike hangars	£36k	£24k Tranche 3 TfL Funding + Strategic CIL	Fully funded
Crossings	£70k	Strategic CIL	Fully funded

- 8.5 Where restrictions introduced by experimental traffic management orders are breached, the Council can enforce against such breaches (usually in the form of fixed penalty notices issued by enforcement cameras). The purpose of LTNs is not to generate income for the Council and all fines received and costs incurred will be used by the Council, in accordance with the requirements of Schedule 2 to the Local Authorities and Transport for London Act 2003.

### Procurement

- 8.6 N/A

### Legal

- 8.7 The Council as a local traffic authority must under section 16(1) of the Traffic Management Act 2004 manage its road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the objective of securing the expeditious movement of traffic, including pedestrians, on the Council's highway network and facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- 8.8 Section 16(2) of the 2004 Act refers to action which the authority may take in performing the network management duty including, in particular, the stated action and which may involve the exercise of the stated power.
- 8.9 Section 6 of the Road Traffic Regulation Act 1984 ("RTRA") allows for the making of permanent traffic orders restricting or prohibiting use of a road or part of one by particular types of vehicles or pedestrians, referred to as traffic management orders ("TMO"); sections 9-10 provide for the making of



experimental traffic orders (“ETOs”), which may not last longer than 18 months and may be continued from time to time during the period of up to 18 months from the date the order first came into force.

- 8.10 When exercising its functions under the RTRA the Council must under section 122(1) so far as practicable having regard to the matters specified in subsection (2) 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.
- 8.11 The “matters specified” in subsection (2) are (1) the desirability of securing and maintaining reasonable access to premises; (2) 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; (3) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy); (4) 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 (5) any other matters appearing to the .... local authority to be relevant”.
- 8.12 Section 122 of the RTRA involves a balancing exercise that has involved the Council’s officers having in mind the section 122(1) duty, having regard to factors pointing in favour of imposing a restriction on that movement (as discussed in this report), balancing the various considerations and coming to the conclusion that the recommendations in this report represent the appropriate outcome. The factors which have pointed in favour of imposing a restriction on that movement have included the objective of reducing pollution and carbon emissions, improving health outcomes, reducing collisions and reclaiming neighbourhood streets for pedestrians.
- 8.13 The procedures that must be followed before making a traffic regulation order are set out in the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 (the “1996 Regulations”). Under regulation 6, various bodies such as affected transport providers and the local fire brigade must be consulted.
- 8.14 There is no requirement to consult the general public before an ETO is made like there is for a TMO, but where the ETO may affect passage along any road the Council must consult such other organisations (if any) representing persons likely to be affected by any provision in the order as the order making authority thinks it appropriate to consult.

- 8.15 An ETO must be genuinely experimental in nature - an operation designed to glean information about the workings of a scheme in practice.
- 8.16 Although there is no statutory requirement to consult the general public before making an ETO to implement this LTN, the Council's aspirations to make the Borough a healthier place to live, work and rest and safer for school children walking and cycling to school are dependent on community support and involvement, which engaging with people affected by these proposals will help achieve.
- 8.17 A consultation will not be lawful unless it is (1) undertaken at a time when proposals are still at a formative stage; (2) sufficient reasons are given for any proposal to enable people who are interested in the same to consider the proposals and make representations; (3) adequate time has been given for such consideration and response; and (4) all representations have been conscientiously taken into account when finalising the proposals.
- 8.18 From the information within this report it appears that the Council has informed every household and business in the relevant area(s) of the proposals regarding the LTN and given households/businesses [five] weeks within which to provide responses. The responses received have been analysed and regard had to the same when considering which of the proposed changes to proceed with.
- 8.19 The exercise of the power contained in section 63 of the RTRA to provide parking places for securing bicycles and to restrict the use of part of a road so that bike hangars can be installed without prior notification or the need for a traffic order for example and section 9 to make ETOs is an executive function which can be exercised by Cabinet in accordance with the Council's Constitution.
- 8.20 The exercise of the power contained in section 23 of the RTRA to provide pedestrian crossings without the need for a traffic order can be exercised by Cabinet in accordance with the Council's Constitution.

### **Equality**

- 8.21 The Council has a Public Sector Equality Duty under the Equality Act 2010 to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
  - Advance equality of opportunity between people who share those protected characteristics and people who do not

- Foster good relations between people who share those characteristics and people who do not.

8.22 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

8.23 The proposed scheme has been assessed via a comprehensive Equalities Impact Assessment (Appendix M). A summary of the assessment is provided below:

Characteristic	Assessment summary
Age	<p>School Streets will create positive impacts for children in terms of improved safety and encouraging active travel.</p> <p>Reduced air pollution would contribute towards improved health outcomes for all ages but particularly younger and older people who are more vulnerable to poor air quality.</p> <p>An LTN would provide a safer environment for older people, particularly those with early dementia or Alzheimer's. Elderly people may have increased GP and hospital appointments or need to travel by motor vehicle more due to mobility issues. The proposed schemes may potentially alter their journey times but access to St Ann's Hospital and surrounding surgeries are still easily accessible.</p>
Disability	<p>The scheme may initially impact residents with certain impairments or disabilities. Adapting to changes in their environment can present challenges and require time to adapt. Although they are likely to benefit from decreased traffic flows as they are less likely to drive, safer environment and better air quality, the initial change could be confusing..</p> <p>Those with disabilities may have increased GP and hospital appointments and are more likely to have mobility issues that require motor vehicle transportation. The LTN scheme could indirectly discriminate this group as their journeys routes and duration may be altered. and the proposals. It may also negatively impact on those who may find it more difficult to walk or cycle, and therefore prefer the use of door-to-door transport services. Concerns noted from consultation regarding higher fares and longer delays for taxis.</p>

	<p>Reduction or elimination of through-traffic is likely to reduce conflict between different road users on the whole.</p> <p>Disabled people would benefit from better air quality resulting from the scheme. Safer environment would also encourage them to walk or cycle more and enable them to be more mobile and less reliant on a motor vehicle if they are able to.</p> <p>Proposed mitigations noted for disabled people by making the following eligible for an exemption to non-hard closure filters in the LTN experimental scheme:</p> <ul style="list-style-type: none"> <li>• Blue Badge holders living within the Bounds Green LTN or on the immediate boundary of it</li> <li>• Special Educational Needs transport</li> <li>• Essential Haringey Council services catering for people with a disability</li> </ul>
Sex	<p>Women are more likely to use the bus than men. As many public transport journeys start or end on foot or cycle, improvements in safety and convenience to these networks will improve their access to public transport. Fewer women than men report being able to ride a bike. Increasing residents' access to favourable cycling conditions is likely to benefit women. Women are more likely to take children to and from educational and recreational facilities and be carers. Those who can walk to local schools would benefit from a safer local environment. Women who rely on a car as transportation to school or to provide care may have their journeys altered which could create negative impacts. Overall, the air quality, health and mode shift benefits are considered to outweigh the inconvenience caused by longer vehicle journeys to this protected characteristic.</p>
Gender reassignment	<p>No clear evidence or data to expect the proposals will impact on this group</p>
Marriage and civil partnership	<p>No clear evidence or data to expect the proposals will impact on this group</p>
Religion or belief	<p>Improving conditions for walking and cycling is likely to positively benefit those who follow a religion and attend a local place of worship. The schemes are likely to increase or alter some journey times for some worshippers who normally drive to their place of worship. All worshippers would still be able to continue to access their respective destination. Overall, the air quality, health and mode shift benefits are</p>

	considered to outweigh the inconvenience caused by longer vehicle journeys for this protected characteristic.
Race	Deprived and ethnically diverse neighbourhoods have worse air pollution levels. Tackling air quality would contribute to increasing health outcomes in this protected group
Sexual orientation	No clear evidence or data to expect the proposals will impact on this group
Pregnancy and maternity	<p>There are many parents who walk or cycle with their children. These parents will benefit from the proposals via a safer environment.</p> <p>Where the journey is walked or cycled through the project area, it is likely to be less polluted and have reduced volumes of traffic. Improvements in air quality are likely to benefit infants and children who are more vulnerable to breathing in polluted air than adults.</p> <p>Should journey times substantially increase due to the proposals this could negatively impact on parents or those who are pregnant, or who have infants and/or young children and find it more difficult to walk or cycle, and therefore may prefer the use of door-to-door transport services. Expectant mothers and mothers who have recently given birth may also have increased numbers of medical appointments that they prefer to make using a vehicle.</p> <p>Overall, the air quality, health and mode shift benefits should be considered against the inconvenience caused by longer vehicle journeys to this protected characteristic.</p>

8.22 Over the period in which the proposals for the LTN and complementary measures have been developed a variety of measures have been taken to ensure that the Public Sector Equality Duty has been met including an iterative EqIA. The Council has engaged extensively with stakeholders to ensure that the potential impacts of the emerging proposals on groups with protected characteristics are fully understood. Where potential negative impacts have been identified, steps have been taken to mitigate these and to ensure that as far as possible the proposals advance equality. Input of stakeholders fed into early design work and following further engagement and public consultation changes have been made to the emerging proposals to address potential impacts including development of various exemptions to the proposed LTN restrictions. As it is not possible to predict exactly what the impacts of the proposals will be it is proposed they are implemented as a trial. There will be

comprehensive monitoring of the impacts to ensure that these are fully understood and there will be continuing engagement with residents and stakeholders for the same purpose. As the scheme is a trial there will be scope for the Council to deliver further mitigations if required to address any impacts on protected groups.

## **9 Appendices**

Appendix A: Strategic context

Appendix B: Haringey Streetspace Plan

Appendix C: St Ann's LTN funding bid

Appendix D: St Ann's LTN Communications and Engagement Plan

Appendix E: Engagement Stage 1 Commonplace report

Appendix F: Written responses following Engagement Stage 1 online meetings

Appendix G: Engagement Stage 3 consultation leaflet

Appendix H: Engagement Stage 3 High Level Transport Assessment

Appendix I: Engagement Stage 3 Equality Impact Assessment

Appendix J: Consultation survey

Appendix K: Engagement Stage 3 Consultation Report

Appendix L: Plan of experimental LTN scheme and complementary measures proposed for implementation

Appendix M: Updated EQIA

## **10 Local Government (Access to Information) Act 1985**

None