

Equality Impact Assessment

Bounds Green Low Traffic Neighbourhood

Introduction

With a population of 8.7 million, London is now larger than it has ever been and it is forecast to grow further, to 10.8 million people by 2041. This is expected to generate more than six million additional trips each day so more journeys will need to be taken on foot, by bicycle or on public transport, the most sustainable forms of transport. London's population is also living longer. This means there will be a greater proportion of older people who need to remain physically active for their wellbeing and quality of life but also to relieve pressure on healthcare services.

People walking in London's most deprived areas are more than twice as likely to be injured by a motor vehicle as those in the least deprived areas. People aged between 20 and 29 years old are more likely to be killed or seriously injured than those in other age groups and the number of children killed or seriously injured in cars increased as recently as 2016. Black, Asian and no-white Londoners are more at risk from motor vehicle injury, with children in this group being on average 1.5 times more likely to be killed or seriously injured on the roads than white children¹.

Alongside road danger, air pollution is an invisible but acute threat to children's health. Around 1 in 3 babies are growing up in areas of the UK with unsafe levels of particulate matter – that's nearly 270,000 babies under the age of 1 in the UK². Toxic exhaust pipe emissions damage children's growth and leave them with lasting health problems (it should be noted that harmful particulate matter is also produced by tires and brake linings which includes those fitted to electrically powered motor vehicles). In 71% of UK towns and cities, children are breathing unsafe levels of air pollution³.

¹ Vision Zero Action Plan – Taking forward the Mayor's Transport Strategy <https://content.tfl.gov.uk/vision-zero-action-plan.pdf>

² <https://downloads.unicef.org.uk/wp-content/uploads/2019/02/Healthy-Air-for-Every-Child-A-Call-for-National-Action-1.pdf>

³ Unicef – Healthy Air for Every Child <https://downloads.unicef.org.uk/wp-content/uploads/2019/02/Healthy-Air-for-Every-Child-A-Call-for-National-Action-1.pdf>

Low Traffic Neighbourhoods (LTNs) form a key part of Haringey's draft Walking and Cycling Action Plan⁴ which sets out how to make the borough a more attractive place for residents, businesses and visitors, by enabling more walking, wheeling⁵, cycling and public transport trips; whilst reducing motor traffic overall. Motor vehicle-centric street design disproportionately impacts those with the lowest levels of motor vehicle access and household incomes⁶ and by introducing well designed LTNs we can create streets that enable more walking, wheeling and cycling for those who benefit the least from traditional, passive traffic management approaches. In addition, research has shown that LTNs are able to reduce car ownership per household over time⁷, leaving more traffic capacity for those who have little option but to drive local trips.

Equality Impact Assessment

A local authority may undertake an Equality Impact Assessment (EqIA) around significant changes to a policy or service that could have a disproportionate impact on individuals or groups that share a protected characteristic under the Equality Act 2010. The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

The nine protected characteristics as defined by the Equality Act 2010 are as follows:

- Age
- Disability
- Sex or gender
- Gender reassignment
- Marriage and civil partnership
- Religion or belief
- Race
- Sexual orientation
- Pregnancy and maternity

It may also be appropriate to consider the impact of the proposal on other groups not protected under the Equality Act including parents/carers and/or socio-economic groups.

⁴ Haringey's Draft Walking and Cycling Action Plan <https://www.haringey.gov.uk/parking-roads-and-travel/travel/haringeys-transport-strategy/draftwcp>

⁵ 'Wheeling' – in this context meaning anyone using a mobility aid such as a wheelchair, wheeled walking aid (e.g. Rollator) or 3 or 4-wheeled mobility scooter; 'wheeling' also includes others such as children using push-scooters and parents/carers using buggies and pushchairs.

⁶ Inequalities in self-report road injury risk in Britain: A new analysis of National Travel Survey data, focusing on pedestrian injuries

<https://www.sciencedirect.com/science/article/pii/S2214140517306308>

⁷ <https://findingspress.org/article/17128-low-traffic-neighbourhoods-car-use-and-active-travel-evidence-from-the-people-and-places-survey-of-outer-london-active-travel-interventions>

Haringey Council intend to adopt socio-economic status as a local protected characteristic to inform future policy making⁸.

An Iterative Approach

As per Transport for All's manifesto for 'EqIAs in Action'⁹, all efforts should be made to ensure the EqIA is part of a public engagement process and be treated as an iterative document. The EqIA should continue to be updated with feedback and any planned impact mitigations throughout the lifetime of the project including during the trial phase. As such, the analysis undertaken in this document represents a starting point for understanding the impacts of the LTNs on residents with protected characteristics. We recognise that in the past the EqIA process has been viewed by some as a 'tick-box' exercise and that, as a whole, the transport planning sector must move towards a consultative approach to such assessments. We are aiming for a process whereby the lived experiences of people with protected characteristics are reflected in the approach to design and that where possible impacts are planned for or responded to during the trial period.

Public Engagement Timeline

- February 2021 – Perception survey for residents of all three LTN project areas (Stage 1 Engagement)
- March 2021 – Online public briefings for each project area
- May 2021 – Stakeholder mapping exercise begun with focus on local groups representing those with protected characteristics (see appendix)
- May 2021 – Series of public collaborative design workshops, online
- May 2021 – Key stakeholder design workshop, online (Stage 2 Engagement)
- June 2021 - Workshop with Disability Action Haringey and Wheels for Wellbeing
- July 2021 –September 2021 Disabled Persons and Carers Survey running from Monday 10 May to Wednesday 1st September 2021.
- August-September 2021 - Public consultation (Stage 3 Engagement). All postal addresses written to with details of proposals and survey. This included translation offer and accessible format options

⁸ <https://www.minutes.haringey.gov.uk/documents/g9971/Public%20reports%20pack%2022nd-Jul-2021%2018.30%20Cabinet.pdf?T=10> (page 121 of the document, pg.115 of the report)

⁹ Paving The Way for inclusive streetspace: our manifesto for 'EQIAs in Action'
<https://www.transportforall.org.uk/news/paving-the-way-for-inclusive-streetspace-our-manifesto-for-eqias/>

- August-September 2021 - On-street pop-up (informal) engagement, evenings and weekends
- August-September 2021 - On-street engagement outside school sites to hear from children, parents and carers during consultation period
- August-September 2021 - Face to face visits with local businesses
- September 2021 – Online meeting with local schools
- November 2021 – Online meeting with residents who are disabled or carers

Whilst we have had success collaborating with Haringey Disability Action and Wheels for Wellbeing, there are more local groups representing and working with people with protected characteristics from whom we have yet to hear (please see appendix for the groups we have written to). As such work on this EqlA should continue throughout the project lifecycle and beyond to ensure that projects include and improve the situation for those people who are heard from less often.

Perception Survey Results

In February 2021, online perception surveys¹⁰ were launched for each project area providing residents with an opportunity to leave location specific comments about their experiences moving around the project area.

- 1,484 people visited the site and there were 649 confirmed respondents who left comments or ‘Agreements’.
- The most common issue raised by respondents was ‘Air Quality Concerns’ accounting for 53% of all comments and agreements, followed by ‘Traffic Congestion’ and ‘Traffic Volume’.
- The most common suggested improvement from respondents was “Reduce Traffic Volumes” accounting for 38% of all comments and agreements, followed by “Measures to Improve Air Quality” and “Reduce Traffic Speeds”.
- The principal geographical hotspot for comments was on Brownlow Road, followed by Woodfield Way, Winton Avenue, and Clarence Road/Truro Road/Finsbury Gardens.

Public Consultation Results

¹⁰ Haringey Bounds Green Perception Survey Analysis
https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_bounds_green_commonplace_report_v2.0.pdf

Between August and September 2021, we ran a public consultation on our proposals for a low traffic neighbourhood in Bounds Green. The consultation was accompanied by a range of public engagement activities which were supported by Sustrans.

- In total 1,511 people responded to the consultation – 1,388 via the online portal and 123 via paper surveys
- While the survey was filled in by a range of respondents, responses are not representative of the population of the area. Consultation results should be understood within this context. Groups that are overrepresented in the survey include: those with access to a private car; those identifying as “White”; and women. The most common age group were those aged 35-44 and 45-54. The number of people who said they had a disability and/or a long term illness is roughly in line with national averages.
- Respondents used a sliding scale from 1 to 5 to respond to questions, with 1 being negative and 5 being positive. When asked how they felt about LB Haringey proposing to reduced motor vehicle traffic in the Bounds Green LTN: 48% selected “1 – Negative”, and 7% selected “2”. 5% selected “3”. 4% selected “4” and 34% selected “5 – Positive”.
- Respondents were also asked about the changes being proposed in the three consultation areas. There were similar patterns of response to these, with between 57%-60% selecting “1-Negative” and between 26%-29% selecting “5-Positive”. Those selecting “2”, “3”, “4”, or “I don’t know” were each under 6% respectively.
- There was much more positivity for the proposed crossings, bike hangars and School Streets.
- The main reasons people gave for negativity around the proposed changes included:
 - Concerns around the impact on congestion and traffic volumes on main roads in the area
 - Concerns around increased car journey times
 - Linked to both these points, people raised concerns around the impact on air quality in the area and raised concerns around the equity of the LTN for those living on main roads
 - Other less common reasons people gave included concerns around access to houses and/or local amenities, the impact of increased traffic on road safety, personal security on quieter roads, and accessibility of emergency services
 - A number of comments also made explicit reference to the adjacent Bowes LTN in Enfield

- Respondents with a physical or mental health condition/illness were more negative about the proposals than those without.
- Disabled respondents and carers in the area gave similar reasons for being negative about the schemes to overall responses. However, many of them linked their concerns to their disability – e.g. longer journeys to health services, the ability of carers to meet appointments, being unable to walk or cycle places due to a disability/health issue.
- For specific schemes, generally older people were less positive about the proposed changes than younger people.
- Women were less positive about the proposed changes than men.

The Bounds Green LTN consultation report contains a more detailed breakdown of the consultation results.

Disabled Residents and Carers Survey

A survey for disabled residents and/or carers in the LTN area was developed to explore some of the specific needs and suggestions from these groups. 70 responses were received from those in the Bounds Green area. 57 of the 70 respondents left comments

. Of those who responded

- 25 identified as a carer
- 30 identified as a resident with a disability
- 14 responded on behalf of a resident or family member with a disability

The most common locations that people required access to included:

- Doctors/health centre (particularly on Gordon Road), pharmacy and other medical services (16 comments)
- To give care to relatives (7 comments) – some of these were within the LTN area but 2 explicitly said they cared for people outside the area
- Public transport (5 comments) including bus stops and Bounds Green tube
- Local shops (4 comments)

- School/education (3 comments)

The key issues raised about the LTN included:

- Concerns about longer journey times (28 comments)
- Many of these also said that the LTN would block access to key places, such as homes or services (14 comments)
- There were also concerns that carers would no longer be able to access those they care for. These related to both professional carers and those caring for relatives/friends (14 comments)
- Often linked to an increase in journey times were concerns around the impact of LTNs on main roads (13 comments)
- A number of the above comments also stated that they were unable to walk, cycle or take public transport as an alternative to using their car (11 comments)
- Other key issues raised included linking the above issues with the existing filters installed by Enfield (8 comments) and concerns about air pollution (7 comments)

While many of the issues raised were similar to the public consultation, many responses highlighted how the issue would specifically impact their disability (e.g. ability to access medical services, problems for care givers, increased journey time triggering anxiety, increased air pollution triggering asthma)

There were also a number of comments highlighting the benefits of the LTN:

- 6 of these comments left general support
- There were a number of comments that said that the LTNs would improve their mobility, opening up routes for them to walk, cycle or use a wheelchair (5 comments)

Many of the positive comments highlighted that the existing street landscape and traffic volumes had a negative impact on their mobility.

Some comments made specific suggestions about what LB Haringey could do differently:

- The most common of these was around improving the consultation (21 comments). These comments related to: ensuring that disabled voices are listened to; improving communications, including mail-outs that specifically target disabled people; include disabled people earlier in the consultation; and consider specific needs of disabled people in material (not just images; braille etc.)
- There were some specific comments about physical changes, including expand the schemes (4 comments), scrap the schemes (4 comments), improve walking, cycling or wheelchair routes in the area (3 comments), and reintroduce the banned right turn onto Bounds Green Road from Whittington Road (3 comments).

Reviewing Research

In addition to the insights which will be gathered during our programme of public engagement, we have reviewed a number of documents including Transport for All's recent 'Pave the Way' report¹¹. This and existing guidance¹² on best practice for designing accessible street-space informed our approach to this assessment. Research shows that people with different characteristics have different needs and experience the urban environment in ways that are both unique and that intersect with the needs of other characteristics.

Whilst reviewing existing research, it became apparent that the relationship between the street environment and some characteristics is better understood than that of others. For example, it was found that a significant amount of research exists around how people with mobility challenges experience their street environment, whereas more research may be needed around how people with different sexual orientations experience the street environment.

Why do we need Low Traffic Neighbourhoods (LTNs)?

According to Department for Transport data, between 2010 and 2019, the number of miles driven on Haringey's roads increased by 73,000,000¹³. With 57% of Haringey households having no access to a private car or van at last census, enabling more affordable and sustainable transport for short trips is essential to improving air quality, reducing road danger and managing motor traffic congestion. Whilst motorised transport has provided some benefits to society, the costs are high and often born by those who benefit the least. Increasing motor traffic dependency has led to a raft of damaging outcomes including

¹¹ Pave the Way, Transport for All <https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/>

¹² 'Creating better streets: Inclusive and accessible places', Chartered Institution of Highways & Transportation, 2018 https://www.ciht.org.uk/media/4463/ciht_shared_streets_a4_v6_all_combined_1.pdf

¹³ <https://roadtraffic.dft.gov.uk/local-authorities>

physical inactivity, community severance, air pollution, social isolation and a collapse in childhood freedom. Over the decades, urban minor roads (often referred to as side roads or back streets) have become little more than short-cuts for motor traffic, a situation exacerbated by the upturn in use of in-car satellite navigation technology (sat-navs). Sat-navs have enabled drivers to choose minor roads to bypass congestion and queues on main routes especially around signalised junctions.

Streets welcoming to walking, wheeling and cycling

The LTN approach aims to restore urban minor roads to their original low-traffic, resident oriented status by removing through motor traffic. Evidence of the success of this approach continues to emerge from other London boroughs¹⁴, with fresh data showing overall motor traffic reductions, increased walking rates and reductions in crime. Subject to consultation, the project will introduce motor vehicle access changes to minor roads across the project area in order to achieve a wholesale reduction in the number of motor vehicles movements. Residents will retain access to their homes in their cars. This will in turn greatly increase the overall number of streets which are attractive to walking, wheeling and cycling, with associated improvements for public health and community cohesion¹⁵. Over time, fewer short, driven trips will be made, reducing congestion on main routes benefitting bus users and other essential services.

Key outcomes for an LTN project

- Reduction of road danger and improved perceptions of road danger
- A built environment that enables people to walk, wheel and cycle more
- Significantly reduce through motor traffic on minor roads, improving air quality
- Create opportunities to improve the accessibility and inclusivity of public spaces through design

LTNs introduce greater priority for pedestrians on minor roads, supporting social distancing and enable more cycling for local trips, further serving to reduce pressure on public transport. Haringey's LTN designs ensure all properties and addresses remain accessible by motor vehicle, however, routing may change for some trips depending on destination. The shortest driven trips will not be impossible however they may become less convenient effectively nudging those who can to walk, wheel or cycle more often. Driver access has been observed

¹⁴ St Peter's People Friendly Streets trial, Results from 6 month monitoring report (Islington)
<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/transportandinfrastructure/information/adviceandinformation/20202021/20210310stpeterspeoplefriendlystreetinterimmonitoringreport.pdf>

¹⁵ Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol UK
<https://uwe-repository.worktribe.com/output/968892>

to improve in existing LTN's as resident drivers are not in conflict with through traffic on narrow roads. This also applies to bus services using the minor road network. There is potential for local people and local businesses to make use of spaces reclaimed from fast moving motor vehicles, for informal gatherings of neighbours and for children to experience a restored freedom too.

What is a Modal Filter?

As part of the LTN, 'Modal Filters' will be introduced to a limited number of streets within the project area, maintaining access for residents but limiting vehicle movements to those that require access to addresses within the project area i.e. access-only streets. Modal filters have been in use across London for decades and examples can be found in and close to the project area. Modal Filters in this case will be a mix of physical bollards or planters and camera-controlled locations as agreed with the emergency services.

- Modal filters can be a physical structure in the street (e.g. bollards, planters) or be controlled by automatic number-plate recognition (ANPR) cameras.
- Motor vehicle users will be able to access filtered roads from either end, however, the filter will prevent vehicles passing through by way of a short-cut.
- Camera-controlled modal filters are designed to favour emergency services vehicles, buses with those walking, wheeling and cycling with all able to pass through. Bollard controlled filters allow those walking, wheeling or cycling to pass through.
- As far as possible, low-cost, adaptable features will be used to effect these access changes, whilst their temporary nature allows the highway authority to amend and improve the layout based on monitoring and feedback from residents.

Evidence and Assessments

This assessment benefits from the research data presented in Transport for London's (TfL) 'Travel in London: Understanding our diverse communities' report which was updated in 2019, so for any references in this section without footnotes please refer to this document¹⁶.

¹⁶ Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

The report was commissioned by TfL to identify the barriers faced by London's diverse communities when accessing transport.

London of Borough of Haringey

Haringey's residents are highly diverse and the 'State of the Borough' profile¹⁷ released in April 2021 helps us to understand the community better. During the Covid-19 lockdown in 2020, TfL calculated that Haringey had the potential to see a 57% increase in motor vehicle trips if owners switched public transport trips to driving following the first lockdown¹⁷. An increase in traffic of that magnitude would lead to unacceptable delays to emergency and essential services in Haringey, as well as delays to those who rely on motor vehicles for mobility and would likely be damaging to the local economy too. As such, LTNs enable alternatives to short, driven trips.

- 38% of Haringey residents are from Black, Asian and ethnically diverse groups and 26% identify as "white other". Over 180 languages are spoken in Haringey.
- 1 in 5 adults in Haringey have high blood pressure and a third of residents are not getting enough physical exercise

Age - Including the experiences of young people (age 18 and under) and older people

Bounds Green LTN project spans both Bounds Green and Alexandra wards. Bounds Green ward's overall population spread mirrors that seen in Haringey more widely, with just under half of residents aged 20-44 (43.4%), and a small proportion aged 65+ (9.7%). However, Alexandra ward has a broadly older population compared to other Haringey wards, with a larger than average proportion of residents aged 45-64 (27.2%, the largest proportion in the borough) and a larger than average proportion aged 65+ (13.6%). It should be noted though that these figures are skewed somewhat by the low population density in Alexandra ward due to large amount of green space.

What we know about young people

- There are 56,718 children in Haringey aged 0-17 years, representing 21% of the population.

¹⁷ Haringey at a Glance – State of the Borough
https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

- More 11-17 year olds walk to school in Haringey than in any other London borough (64% mode share)¹⁸
- In Haringey, 3.3 times more primary school children walk to school than are driven to school¹³
- Walking is the most commonly used mode of transport by younger Londoners (97% of those aged 24 and under walk at least once a week compared with 95% all Londoners)
- Air pollution disproportionately impacts on children living in deprived parts of Haringey¹⁹. In actual fact, the 20% most deprived areas in London had 8.6% more PM10 and 8.1% more NOx compared to the 20% least deprived areas

Schools within Bounds Green project boundary

- Trinity Primary Academy
- St Martin of Porres Primary
- Greek Secondary School, Trinity Road

Schools within a short walk of project boundary

- Bounds Green School
- Bowes Primary School
- Alexandra Park School
- Rhodes Primary School
- Earlham Primary School
- Broomfield Secondary School
- St Michael at Bowes Church of England Junior School
- Tottenhall Infant School
- St Thomas More School
- Saint Paul's Roman Catholic Primary School

Assessment

¹⁸ TfL Streetspace Guidance, Appendix 7 – Case-making Data for Boroughs <https://tfl.gov.uk/info-for/boroughs-and-communities/streetspace-funding>

¹⁹ https://www.haringey.gov.uk/sites/haringeygovuk/files/air_pollution.pdf

The travel mode of children has changed significantly over the last 30 years, with rates of active travel amongst children collapsing and associated health inequalities soaring. Despite this walking is still the most frequent travel mode for young people in Haringey. Research shows that LTN's implemented in London in 2020 have cut motor traffic related injuries by half²⁰ with particular benefits for walking trips. With 21% of Haringey being aged 17 or under, this is a group that can be particularly affected by changes to street space. Up until secondary school age, to larger extent, parents determine how children travel and as such may restrict children from being active due to perception of danger from sources such as motor traffic.

Road Danger - Data shows that for each mile driven on a minor urban road, results in 17% more killed or seriously injured pedestrians than a mile driven on an urban A road²¹. As LTNs specifically target through motor traffic on minor roads, this design approach particularly benefits younger people as they walk often and leaving more vulnerable to danger posed by motor vehicles on minor roads. In addition, perceptions of road danger have a significant impact on parental decision-making around how children travel but also their freedom to roam in general. Road danger can be quantified in terms of numbers of collisions on the street, whilst perceived levels of road danger are based on the observations of individuals and their own experiences such as near misses whilst crossing the road and volumes of motor traffic on streets without crossings and with poor sightlines.

Walking trips - Walking is the most frequent mode of travel for young people and children, as such increasing the number of minor roads with very low road danger across an area can help to protect a group who are already travelling actively regularly¹⁶. Children use minor roads to connect to and between major roads where many destinations lie and as such an LTN can provide a low-danger walking network for those who walk often. As such LTNs broadly protect protected groups who frequently walk (or use footways) which includes younger people. It is recognised that it may not be possible to radically reduce motor traffic on all roads simultaneously and that other measures that encourage walking and cycling are needed for main routes. These may include controlled crossings, footway widening and kerb protected cycleways, all of which would benefit those protected by the age characteristic.

Air Pollution - Air pollution particularly impacts on children living in deprived areas. Evidence shows that the 20% most deprived areas in London had 8.6% more PM10 and 8.1% more NOx compared to the 20% least deprived areas. Research in boroughs who have introduced

²⁰ <https://findingspress.org/article/25633-impacts-of-2020-low-traffic-neighbourhoods-in-london-on-road-traffic-injuries>

²¹ Motor traffic on urban minor and major roads: impacts on pedestrian and cyclist injuries
<https://www.icevirtuallibrary.com/doi/full/10.1680/jmuen.16.00068>

wide-spread measures to enable active travel including LTNs shows that significant increases in air quality can be expected²².

School Streets - Haringey Council are planning two School Streets projects in the Bounds Green project. A School Street restricts motor vehicle movements around a school site at drop-off and pick-up times. A School Streets trial at a primary school in Eltham resulted in a 54% reduction in cars driving to school, a 27% increase in cycling and 9% increase in scooting. School Streets are generally controlled by ANPR cameras and aim to protect children from road danger and enable more children and parents to walk, wheel or cycle to school.

Traffic Reduction - When an LTN is introduced evidence shows that overall traffic volumes fall in the longer term within the LTN²³. However, in the very short term, there may be some increase in driver queues at some main road junctions at certain times of the day. This may initially lead to intermittent delays to bus services, which could impact on young people travelling. Longer term, evidence from other LTN schemes across London shows differential impacts²⁴. The impact on the wider area is unknown at this stage and will be subject to ongoing monitoring in order to inform implementation.

Mitigation

School leaders are key stakeholders and the delivery team have met with them on several occasions so far ensuring communication channels are open as early as possible. Throughout the consultation and trial the Council will continue to respond to residents and direct them to advice and information where necessary. A programme of ongoing monitoring of Haringey LTN projects has been developed (including looking at overall traffic volumes and air quality) and this vital to inform the development of specific impact mitigations where necessary. The Council will also be offering an exemption to SEN²⁵ transport vehicles through some of the LTN filters (e.g. those which are not subject to a hard closure).

Update November 2021

- The council have met with all schools in the project area to answer and respond to questions and address concerns about the LTN. Schools in the area are, in principle, supportive of the LTN and its objectives.

²² https://www.walthamforest.gov.uk/sites/default/files/WalthamForest_Kings%20Report_310718.pdf

²³ <https://enjoywalthamforest.co.uk/work-in-your-area/walthamstow-village/comparison-of-vehicle-numbers-before-and-after-the-scheme-and-during-the-trial/>

²⁴ https://www.haringey.gov.uk/sites/haringeygovuk/files/bruce_ta_0.pdf

²⁵ The term 'Special Educational Needs' or 'SEN' is used to describe learning difficulties or disabilities that make it harder for children to learn than most children

- Designs to the school street on Trinity Road have been revised. School street restrictions will now only be implemented on the eastern side of Trinity Road. the western side will remain accessible.
- SEN transport vehicles will be eligible for an exemption which will enable them to access to some of the LTN filters (e.g. those which are not subject to a hard closure).

Update June 2023

The Council will allow SEND motor vehicles authorised by Haringey Council through the diagonal restrictions for all three LTNs to facilitate the transportation of a person with special education needs and disabilities.

What we know about older People

- Haringey has 28,632 residents aged 65+ (11% of total population)
- Walking is the most frequently used type of transport by older Londoners aged 65 and over (87% walk at least once a week). 65% travel by bus, 43% drive a car at least once a week and 41% travel by car as a passenger at least once a week
- Older Londoners (14%) are less likely than Londoners overall (30%) to say they are worried about their personal security when using public transport. They are also less likely to have experienced a specific incident of worry when travelling in the past three months (13%, compared with 32% of all Londoners)

Assessment

Whilst walking is the most frequently used mode of Londoner's aged 65 and over²⁶, this assessment recognises that distances people can walk or cycle tend to reduce in the later years of life. Despite the project areas having a low proportion of residents aged over 65, this is still an issue that must be considered. Older people may find it difficult undertaking short distances on foot or using public transport, due to impaired mobility and/or poorly maintained footways.

Walking trips are common for older people in London, however some may be dependent on motor vehicles for longer trips such as visits to healthcare providers such as the NHS Mobility Solution Centre (MSSC) on Edwards Drive N11. Schemes which change motor vehicle access could have a negative impact on this group such as increased journey times under peak flows or disruption for roadworks or collisions on main routes. However, in the proposed

²⁶ Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

Haringey LTN designs, all local amenities and homes do remain accessible by motor vehicle, although some rerouting may be required depending on origin or destination.

Initial mitigations for these risks include our programme of written communications and public engagement to notify people of the changes, and directing residents to advice and information where necessary. Ongoing monitoring of the LTN projects will be important to update this assessment and to develop more specific mitigations where necessary.

Disability - Including the experiences of people with long term health conditions

The UK national census asks people if they have a long term disability that impacts on their daily lives as a proxy for assessing disability rates in the population. We are still awaiting the data for the 2021 Census but 2011 census data shows that 14% of Haringey residents reported a long term health problem that limits their day to day activity, lower than England but in line with London. 5.7% of residents report being in bad health, slightly higher than England and London. At the time of the 2011 Census (2021 Census data has not been published at time of writing), in Bounds Green ward, around 16.9% of residents reported a limiting long-term health problem or disability. This is in line with the rates seen in Haringey (16.7%) and London (16.4%). Alexandra ward differs in that 13.1% of residents reported a limiting long-term health problem or disability. This is substantially lower than the rate seen in Haringey (16.7%) and London (16.4%) more widely, and the fourth lowest rate of all Haringey wards.

What we know about disabled people

- Disabled Londoners use a wide variety of transport to get around the capital. The most common are walking (81% at least once a week), bus (58%), car as a passenger (42%) and car as a driver (24%).

As a whole, 14% of Londoners report living with a disability that impacts on their daily lives. It is recognised that the term 'disability' is an exceptionally broad one and includes people with physical, sensory and cognitive impairments. Broadly we expect the LTN to benefit many disabled people as they tend to be regular footway users and the project will create many more low road danger streets, quieter and easier to cross. However we recognise that will not be the case for all.

- 55% of disabled Londoners state that their disability affects their mobility, 22% have a serious long-term illness and 10% have a mental health condition

Many disabled people have mobility impairments, and some are wheelchair users meaning quality of footway surface and presence of obstructions is also key to accessibility. For example; manual wheelchair users need sufficient space to be able to propel their chair along a footway, people who walk with sticks or crutches also need more space than a non-disabled walker.

- 82% of disabled Londoners walk at least once a week compared with 96% of non-disabled Londoners and 56% walk five or more times a week compared with 86% of non-disabled Londoners.

Disability can affect locomotion, seeing, hearing, reaching, stretching, dexterity, and cognitive functions, but these categories are not exhaustive, or mutually exclusive; many disabled people, particularly older people, have more than one impairment. For example, getting in and out of a car can be difficult and painful for some disabled people, particularly those with arthritis, rheumatism and back problems; and uneven walking surfaces, gaps between paving slabs can cause difficulties for people using sticks and crutches, visually-impaired cane-users and wheelchair users.

In the short to medium-term, for driven trips that previously relied on minor roads to avoid major roads, disabled people may find journey times vary but this will be dependent on time of day, origin and destination as well as factors such as unforeseen, disruptive incidents on main routes which are common in the capital.

- 55% of disabled Londoners state that their disability affects their mobility, 22% have a serious long-term illness and 10% have a mental health condition
- 84% of disabled Londoners report that their disability limits their ability to travel, reflecting that disabled Londoners travel less often than non-disabled Londoners (1.9 compared with 2.4 trips on an average weekday).
- 34% of disabled Londoners have household income of less than £10,000 compared with 10% of non-disabled Londoners.
- Disabled Londoners are more likely to live in a household with an annual income of £20,000 or less than non-disabled Londoners (61% compared with 25%).
- Disabled Londoners are no more likely to live on a main road than those who do not consider themselves disabled. Analysis in 2020 shows that in Outer London 91.4% of Londoners who report a mobility impairment live on minor roads, compared with 91.1% of those who report no issue with mobility.

Assessment

According to analysis of the UK's National Travel Survey, disabled people are five times more likely to be injured as a pedestrian than non-disabled people – reporting 22 motor vehicle injuries per million miles walked, compared to 4.8 among pedestrians without a disability. LTNs create many more 'low road danger' streets and easier crossing which particularly benefits high risk groups like disabled people²⁷. Whilst the most frequent mode of travel reported by disabled Londoners is walking, it must be recognised that for some, travelling actively may pose a significant challenge due to lack of specialist equipment (often costly), or being discouraged by stigma. For people with mobility-related or visual impairments the quality and design of the built environment can have a considerable impact on both sense of freedom but also on mental health and wellbeing. Intuitive street layouts, places to rest, formal crossings and smooth, wide footway are essential if we are to better include everyone in public life. Improved drop-kerbs, new formal crossings and removal of street obstacles should be considered as part of a low traffic neighbourhood type project. The RNIB report that walking is the main mode of travel for blind and partially-sighted people, many of whom who will have fewer transport options available to them than others²⁸.

It is also important to recognise that formal crossings (e.g. zebra) are generally only necessary where motor traffic flows are high relative for the street type so, for some users, converting a street to access-only may allow a safe crossing experience without expensive infrastructure, due to very low vehicle flows. 90.2% of low income Outer Londoners live on minor roads²⁹ but many are less than accessible due, in part, to through motor traffic often travelling at speeds inappropriate to the street environment.

Mitigation

The Council has been developing a relationship with Disability Action Haringey (DAH), and other disability and access stakeholders. We recently completed a 'roll-around' audit of the nearby Bruce Grove LTN project area with mobility aid users who provided feedback around footway hazards, personal security and general accessibility around minor roads. We are now working with DAH to identify service users from the Bounds Green project area who may be able to volunteer for a similar audit.

Throughout the consultation and trial the Council will continue to respond to residents and direct them to advice and information where necessary. Meeting the needs of those with access and disability needs, and their carers, has been an important part of the LTN design process. Hearing the views from the community on these issues at online workshops, through

²⁷ Disabled and low-income pedestrians at 'higher risk of road injury' <https://roadsafetygb.org.uk/news/disabled-and-low-income-pedestrians-at-higher-risk-of-road-injury>

²⁸ RNIB Travel Transport and Mobility <https://www.rnib.org.uk/knowledge-and-research-hub/research-reports/travel-mobility-and-living-skills-research/travel-transport-mobility>

²⁹ LTN's for All? WeArePossible, Active Travel Academy, KR Foundation <https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/5fb246b254d7bd32ba4cec90/1605519046389/LTNs+for+all.pdf>

the Disabled People and Carers survey and the public consultation has helped shape the design of the LTN including the types/locations of filters, the locations of the new pedestrian crossings and the decision to allow emergency vehicle access through camera enforced filters which significantly outnumber the physical closures across the LTN. The Council will be offering exemptions for all blue badge holders³⁰ living in the LTN area and on the immediate boundary of it which will enable them to access to some of the LTN filters (e.g. those which are not subject to a hard closure). An application process to apply for the exemption will be introduced and this will set the criteria for eligibility. This exemption will not apply to School Street filters which are subject to a separate exemptions policy.³¹

Update November 2021

- A cycle hangar proposed on Thorold Road has been proposed in a different location outside on Thorold Road. This is in response to a resident raising concerns about disabled access.
- Marlborough Road filter moved to junction and changed to emergency access filter as specifically requested by emergency services
- Haringey have invited all respondents to the disabled residents and carers survey to attend a further public meeting on the Haringey LTNs on Thursday 25 November 2021.
- Two new controlled pedestrian crossings will be introduced as part of the Bounds Green LTN, one on Bounds Green Road by Gordon Road close to Bounds Green Health Centre and one on Green Lanes by Arcadian Gardens.
- Blue Badge holders living in the LTN or on the immediate boundary of it will be eligible for an exemption which will enable them to access some of the LTN filters (e.g. those which are not subject to a hard closure).

Update June 2023

- Blue Badge holders with a valid Blue Badge and whose main address is within the Borough of Haringey will be able to nominate one motor vehicle which will be permitted to drive through all three LTNs, but only traffic filters which have the Except Permit Holder sign. This option will help Blue Badge holders living outside the LTN to apply for exemptions using a simpler form without the need to provide evidence of condition. There are circa 9,000 Blue Badge holders in the borough, at present and only a small percentage have an exemption.

³⁰ A Blue Badge is a parking permit that helps people with enduring and substantial mobility problems and/or non-visible (hidden) disabilities to access goods and services, by allowing them to park close to their destination.

³¹ <https://www.haringey.gov.uk/parking-roads-and-travel/travel/smarter-travel/school-streets>

Ethnicity - Including impact relating to skin colour, nationality, language spoken and country of origin

Black, Asian and minority ethnic Londoners account for 40% of the London population. Haringey is the fifth most ethnically diverse borough in the UK. Over 65% of Haringey residents and nearly 81% of our school children come from non-White British communities, compared to 20% in England, 55% for London. 190 different languages are spoken in Haringey's schools.

What we know about ethnicity

- Bounds Green ward has a larger proportion of residents whose ethnicity is White-Other (30.5%), compared to the wider Haringey population (25.9%)³². Whereas Alexandra ward has a larger than average proportion of residents whose ethnicity is White British (60%), compared to the wider Haringey population (34.7%). Those of White Other, Asian and Black ethnicity are under-represented in Alexandra, compared to other Haringey wards³³.
- Walking is the most commonly used type of transport by Black, Asian and non-white Londoners. (96% of Black, Asian and non-white Londoners walk at least once a week compared with 95% of white Londoners.)
- Black, Asian and non-white Londoners are more at risk from motor vehicle injury, with children in this group being on average 1.5 times more likely to be killed or seriously injured on the roads than white children³⁴.
- Analysis in 2020 showed that in Outer London 92.5% of white Londoners live on minor roads compared to 90.6% of black Londoners. Data also showed 88.7% of Asian Londoners and 88.2% of diverse ethnic groups live on minor roads³⁵
- The use of cars among black, Asian and non-white Londoners is lower than for white Londoners; 32% of black, Asian and non-white Londoners drive a car at least once a week compared with 41% of white Londoners (33% and 43% respectively in 2013/14).

³² Bounds Green Ward Profile
https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bounds_green.pdf

³³ Alexandra Ward Profile https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_alexandra.pdf

³⁴ Vision Zero Action Plan – Taking forward the Mayor's Transport Strategy <https://content.tfl.gov.uk/vision-zero-action-plan.pdf>

³⁵ LTN's for All? WeArePossible, Active Travel Academy, KR Foundation
<https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/5fb246b254d7bd32ba4cec90/1605519046389/LTNs+for+all.pdf>

- Driving a car is higher among Asian Londoners compared with other black, Asian and non-white groups: 36% of Asian Londoners drive a car at least once a week compared with 27% of black Londoners (39% and 28% respectively in 2013/14).
- Cycling levels amongst black, Asian and ethnically diverse Londoners and white Londoners are very similar. 17% of black, Asian and non-white Londoners cycle in London at least sometimes compared with 18 % of white Londoners, in line with the proportions observed in November 2014 (18% and 17% respectively).

Assessment

With a high proportion of black, Asian and ethnically diverse Londoners residents making sustainable journeys (walking and bus trips), the reductions in road danger and increased pedestrian priority associated with LTN projects will provide conditions that broadly benefit these groups. Black, Asian and ethnically diverse Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads³⁶. When we significantly increase the number of minor roads with infrequent motor vehicles movements it is likely to benefit these groups and lead to changes in desirable changes in behavior. Furthermore, Black, Asian and ethnically diverse Londoners are also less likely than white Londoners to say that they feel safe from road collisions when walking around London at night (60% Black, Asian and ethnically diverse people compared with 74% white). In the perception survey (February 2021) residents reported high rates of speeding drivers on minor roads and removing through traffic will help to change perceptions of danger and enable more walking, wheeling and cycling for the shortest trips.

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys which began in February 2021 with the perception survey. The engagement programme has been designed to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey.

Established community groups and organisations representing different ethnic communities have been contacted and invited to participate in the various stages of engagement. If requested, smaller feedback and discussion sessions can be facilitated with groups that have English as a second language to ensure communication is clear.

Over 180 languages are spoken by Haringey residents. 30% of Haringey residents do not speak English as their main language. This is the 6th highest rate in London and is above the statistical neighbour and London averages. Of those whose main language is not English in

³⁶ TfL Casualties in Greater London during 2014 <http://content.tfl.gov.uk/casualties-in-greater-london-2014.pdf>

Haringey, one in four (24%) either do not speak English well, or do not speak it at all. This is the third largest proportion of all London boroughs, and is above the statistical neighbour and London levels as reported in Haringey at a glance³⁷.

All printed consultation materials could be requested in other languages. The project page can also be translated into other languages.

During the LTN trial, Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of LTN projects has been developed (including looking at overall traffic volumes and air quality) and this will be vital to inform the development of specific impact mitigations where necessary.

Gender

In London, the key demographic differences between women and men are employment status and household income. 37% of women are not working or are retired, with a further 14% employed part-time (compared to 21% and 6% of men respectively). Women are also more likely to be the primary carer of children at home including accompanying younger children to school. Both factors to influence the travel behaviour of women in London. In transport terms, women make a greater number of journeys per weekday than men. Trips made by women tend to be shorter according to Transport for London data³⁸.

- Walking is the most commonly used type of transport by women (95% walk at least once a week).
- Women are more likely to use buses than men (62% compared with 56%), but are less likely to use other types of transport including the Tube (38% women compared with 43% men)
- Women are less likely than men to drive at least once a week (33% compared with 42%). However, they are more likely to be a car passenger (51% compared with 37% of men)
- Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices³¹
- Women are more likely than men to experience worrying incidents when travelling on public transport and are more likely to be deterred from using public transport more often by a number of different barriers including harassment³⁹

³⁷ https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

³⁸ Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

³⁹ Most women have been harassed on public transport <https://yougov.co.uk/topics/legal/articles-reports/2020/01/22/most-women-have-been-sexually-harassed-london-publ>

- A higher proportion of journeys made by women are for shopping/personal business than men (25% compared with 18%)
- Women are less likely than men to be employed full or part-time, and this is reflected in the smaller proportion of journeys that are made for work purposes (25% compared with 38%)

The experience of women whilst travelling in London

14% of women report experiencing some form of unwanted sexual behaviour while travelling in London in the previous year (the equivalent figure for men is 6%)⁴⁰. Furthermore, 41% of women who experienced an incident of unwanted sexual behaviour did not report it because they felt it was not serious enough³². Women cycling have reported experiencing a particular kind of harassment from other road users: that of a sexual nature, and sexist harassment stemming from indignation that a cyclist – and a female cyclist at that, doubly vulnerable and bold – is daring to get in the way of a driver⁴¹. The experience of female cyclists facing disproportionate harassment and bad driving was proven in research by University of Westminster⁴². That women were almost twice as likely as men to be subjected to frightening ‘near miss’ incidents whilst cycling seemed mainly linked to the lower average speed reported by female respondents, compared with the men who took part.

Assessment

Women frequently travel as pedestrians so delivering a network of pedestrian-friendly, low traffic streets via an LTN project is expected to make choosing to cycle a great deal more comfortable for women. Over the long run, it is hoped that enabling residents who drive to leave the car at home more often will also help to reduce the congestion on main routes, which impacts on bus journeys and as such benefits women who tend to travel by bus more than men. Women are more likely to be primary carers for children and so it should be recognised that some may rely on motor vehicles to transport children regularly. For example, to access specialist educational settings outside of the immediate neighbourhood and in some cases these trips may require re-routing or experience some variance in journey time following delivery of an LTN (dependent on origin and destination). However, as described above, the aspiration is that more residents will choose alternative modes of transport over the long run, as has been observed in other LTNs across London, resulting in a reduction in congestion for the remainder of essential journeys.

⁴⁰ Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

⁴¹ What are the barriers that particularly affect women? <https://www.cyclinguk.org/article/campaigns-guide/women-cycling>

⁴² The Near Miss Project <http://rachelaldred.org/wp-content/uploads/2019/03/Nearmissreport-final-web.pdf>

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey. During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of Haringey LTN projects has been developed (including looking at overall traffic volumes and air quality) and this vital to inform the development of specific impact mitigations where necessary.

Gender Reassignment -Where a person is a different gender to their birth gender

Between 2019/20 and 2020/21 there was a 10% increase in transgender hate crime in Haringey⁴³. It is considered unlikely that transgender people will be unduly negatively impacted by the LTN project.

Assessment

It is unlikely that the introduction of an LTN will unduly impact gender reassigned people. However this iEqlA should be considered an iterative assessment document and should specific issues come to light they can be investigated, mitigation considered and actions recorded here.

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey. During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of LTN projects has been developed (including looking at overall traffic volumes and air quality) and this will be vital to inform the development of specific impact mitigations where necessary.

Pregnancy / Maternity - When a woman gives birth or is breastfeeding (up to 26 weeks)

⁴³ Haringey State of the Borough

https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

What we know about pregnancy and maternity

- Haringey's General Birth Rate (GBR) has generally decreased in line with London since 2001. The sharpest decrease was between 2010 and 2017 (26%).
- Northumberland Park has the highest birth rate, at 83 births per 1,000 women aged 15 to 44. The lowest birth rate was in Muswell Hill.
- Over half the infants born in Haringey in 2017/18 were being breastfed at 6-8 weeks after birth.

Assessment

Research indicates that motor traffic pollution is linked to poor pregnancy outcomes leading to children who are more susceptible to disease later in life⁴⁴ and as such action to reduce motor vehicle reliance, including LTNs, will serve to better protect pregnant women and unborn children. However we also recognize that some women may need to travel by motor vehicle more often later in pregnancy including by bus and the LTN may cause some variance in journey times in the short term. However we also expect that in the medium to longer term a reduction in driven trips and therefore traffic congestion will favour those who need to make essential trips by motor vehicle or bus. In addition, research shows that physical activity such as walking or cycling can be an essential factor in the prevention of depressive disorders of women in the post-natal period⁴⁵ and there is good evidence that LTN's lead to people being more physically active⁴⁶.

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey. During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of LTN projects has been developed (including looking at overall traffic volumes and air quality) and this vital to inform the development of specific impact mitigations where necessary.

⁴⁴ Traffic pollution is linked to poor pregnancy outcomes <https://www.bmj.com/content/359/bmj.j5511>

⁴⁵ Physical Activity and the Occurrence of Postnatal Depression
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6780177/>

⁴⁶ Low Traffic Neighbourhoods: what is the evidence from the mini-Holland interventions?
<https://osf.io/preprints/socarxiv/ebj89/>

Religion / Belief

Haringey is one of the most religiously diverse places in the UK. According to the 2011 UK Census, the most common religion was Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) -and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

- Religion in Bounds Green ward mirrors Haringey more widely, with the largest proportion of residents (49%) identifying as Christian. This is a slightly larger proportion compared to Haringey as a whole (45%)⁴⁷.
- Compared to the rest of Haringey, Alexandra ward has a larger than average proportion of residents identifying as having no religion (37.8%), and among the smallest proportion of Muslim residents in Haringey (4.2%)⁴⁸.

Assessment

It is unlikely that the LTN project and associated changes to motor vehicle access will unduly impact people whose religion or beliefs are protected under the Equality Act. It should also be noted that this is an iterative assessment document and should specific issues come to light around people with protected characteristics they can be investigated, mitigation considered and any actions recorded here.

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey. During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of LTN projects has been developed (including looking at overall traffic volumes and air quality) and this will be vital to inform the development of specific impact mitigations where necessary.

Sexual Orientation

⁴⁷ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bounds_green.pdf

⁴⁸ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_alexandra.pdf

What we know about sexual orientation

- 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents⁴⁹.

Assessment

It is unlikely that the LTN project will unduly impact people with these protected characteristics however the reported reduction in crimes associated with these projects may serve to benefit this protected group⁵⁰. It should also be noted that this is an iterative assessment document and should specific issues come to light around people with protected characteristics they can be investigated, mitigation considered and any actions recorded here.

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey. During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of LTN projects has been developed (including looking at overall traffic volumes and air quality) and this will be vital to inform the development of specific impact mitigations where necessary.

Update - LTN Exemptions Criteria and Application Process 11/07/2022

To ensure the LTN advances equality as far as possible, in December 2021, Cabinet approved numerous exemptions to non-hard closure filters in the LTNs, including an exceptional circumstances dispensation (now renamed as 'individual circumstances exemption' following stakeholder feedback). The exemptions criteria are intended to strike a balance between mitigating disadvantage for groups with protected characteristics as far as is practicable while not undermining the broader policy aims of the LTN. The aspiration is that an LTN provides the safest possible environment for people to walk, wheel and cycle in (by significantly reducing motorised traffic), reduces, as far as possible, congestion and air pollution, and has corresponding positive impacts for certain groups with protected characteristics.

⁴⁹ https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf

⁵⁰ LTN's show crime reduction evidence <https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london>

The Council has now developed an LTN Exemptions Criteria and Applications Process which will apply to all LTNs delivered in the borough going forward and provides a borough-wide framework in respect of LTN exemptions.

The Exemptions Criteria and Applications Process provides the following categories of exemptions.

1. Emergency service vehicles
2. Council refuse and cleansing vehicles
3. Blue Badge holders living within or on the immediate boundary of a given LTN
4. Special Educational Needs and Disabilities (SEND) transport
5. Haringey Council services and commissioned service transporting people with a disability and Transport for London's Dial-a-Ride service
6. Any other vehicles required for urgent safety matters with the permission of the Council
7. Individual circumstance exemptions

The Council specifies details for each category which will be exempt, and which will not. Individual circumstance exemptions

Individual circumstances exemptions will be subject to an application process with the onus on the applicant to demonstrate why an exemption is required.

The following are eligible for individual circumstance exemptions, subject to submission of appropriate evidence and justification:

1. Person, or person with a child, with a condition that means sitting in a car or a re-routed journey causes overwhelming psychological distress;
2. Person, or person with a child, with a chronic health condition that makes sitting in a car very difficult;
3. A professional carer whose ability to transport a care recipient in a car or directly assist them with their care needs is significantly impaired by an LTN;
4. An organisation that solely transports people with access or disability needs.

The above approach is considering to be the most appropriate one, balancing all relevant considerations and allows for key circumstances such as:

- enabling a Blue Badge holder living within an LTN (or on the boundary of) to obtain additional vehicle exemptions for vehicles which frequently transport them;
- enabling a Blue Badge holder who does not live within an LTN or on the immediate boundary of that LTN but who needs to travel through it to register a vehicle for exemption to designated filters within that LTN (including Blue Badge Holders who live within an adjacent borough);

- enabling parents or carers travelling with children with a disability to register motor vehicles required for transport of those children to or through the LTN for exemption to designated filters within that LTN;
- enabling professional carers visiting an address in an LTN to administer care to a care recipient to register a motor vehicle for exemption to designated filters within that LTN.

This will ensure that, in most cases, and where justified, groups identified as being at disadvantage from LTNs (young people with SEND, older people, disabled people, carers, and pregnant people) will be able to obtain an exemption to traffic restrictions.

Individual circumstance exemptions are subject to an application process. As part of the application process the applicant must:

- provide the registration numbers of the vehicle or vehicles they are applying for;
- set out the category of exemption being sought (from the list of 1 to 4 above);
- identify the extent of the exemption being sought (specific LTN filters, a single LTN or part thereof where there are discrete parts, or all LTNs in the borough);
 - explain why the applicant believes they are eligible for an exemption;
- provide necessary evidence to support the application such as proof of address and proof of circumstance in the case of an applicant with a circumstance that they believe necessitates an exemption;
- information of the nature and frequency of journeys impacted by the LTN or LTNs;

The Council's application for an individual circumstance exemption is web-based and is available online at [Haringey Streets for People | Haringey Council](#). However, it can also be completed on paper or over the telephone with officers available to provide assistance, as required.

Update – Interim Review of the LTN Exemptions Criteria and Application Process 21/06/2023

Following an interim review of our exemptions criteria and application process the Council is making the following three changes. This has been informed by stakeholder engagement and consultation.

Change 1: To allow all Blue Badge holders with a valid Blue Badge and whose main address is within the Borough of Haringey to nominate one motor vehicle which will be permitted to drive through all three LTNs, but only traffic filters which have the Except Permit Holder sign. This option will help Blue Badge holders living outside the LTN to apply for exemptions using a simpler form without the need to provide evidence of condition. There are circa 9,000 Blue Badge holders in the borough, at present and only a small percentage have an exemption.

Change 2: To allow SEND motor vehicles authorised by Haringey Council through the diagonal restrictions for all three LTNs to facilitate the transportation of a person with special education needs and disabilities.

Change 3: Allow the Council discretion to make changes on a case-by-case basis due to urgent safety matters.

Monitoring and Review

The Council will carry out comprehensive monitoring of all LTNs implemented in the borough and the exemptions criteria and the application process set out in this document will be reviewed as necessary.

References

- Travel in London: Understanding our diverse communities 2019 - <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>
- Haringey at a Glance: State of the Borough, April 2021_ https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
- Haringey Council Ward Profiles - <https://www.haringey.gov.uk/local-democracy/about-council/state-borough/ward-profiles>
- Air Quality: concentrations, exposure and attitudes in Waltham Forest https://www.walthamforest.gov.uk/sites/default/files/WalthamForest_Kings%20Report_310718.pdf
- Road Risk and Vulnerable Road User Working Paper <http://content.tfl.gov.uk/road-risk-and-vulnerable-road-user-working-paper.pdf>
- LTN's for All? (Aldred & Verlinghieri) <https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/5fb246b254d7bd32ba4cec90/1605519046389/LTNs+for+all.pdf>
- Crime reduction in LTN's, Waltham Forest - <https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london>
- Inequalities in self-report road injury risk in Britain: A new analysis of National Travel Survey data, focusing on pedestrian injuries - <https://www.sciencedirect.com/science/article/pii/S2214140517306308>
- Working together to promote active travel, Public Health England, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_Local_authorities.pdf
- Physical Activity and the Occurrence of Postnatal Depression <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6780177>

Research references

- 'Creating better streets: Inclusive and accessible places', Chartered Institution of Highways & Transportation, 2018
- "'Are we nearly there yet?' Exploiting gender and active travel?' S. Motherwell, Sustrans, 2018
- 'The Inclusive Transport Strategy: Achieving Equal Access for Disabled People', 2018
- 'Mental health and travel: Report on a survey' Roger Mackett Centre for Transport Studies University College London, 2019
- 'The Street Mobility Project Toolkit', University College London, 2019
- 'The Future of Transport in an Ageing Society' G.Holley-Moore and H. Creighton, 2015
- 'Guidance on Using Tactile Paving Surfaces', Department of the Environment, Transport and the Regions, 1998
- 'Understanding the travel needs of London's diverse communities: women', Transport for London, 2012 <http://content.tfl.gov.uk/women.pdf>
- 'Driver behaviour at continuous footways research', Transport for London, 2018
- 'Accessible Public Realm: Updating Guidance and Further Research' Chartered Institution of Highways & Transportation Report, 2020
- 'Inclusive Streets: Design principles for blind and partially sighted people', Guide Dogs, 2010
- 'The Design of Pedestrian Crossings, Local Transport Note 2/95', Department for Transport, 1995
- 'Manual for Streets 2', The Chartered Institute of Highways and Transportation, 2010
- Reducing unintentional injuries on the roads among children and young people under 25 years
<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachm>

Appendix 1 – Summary of changes to designs after public consultation

Area of LTN	Key post-consultation changes	Reason for change
<u>Bounds Green LTN (All areas)</u>	Application process to be introduced for Blue Badge Holders living in the LTN area or on boundary roads, <u>SEN transport vehicles</u> and essential council services catering for residents with disabilities to apply for an exemption to the LTN filters.	To help people with enduring and substantial mobility problems and/or non-visible (hidden) disabilities to access the LTN.
Bounds Green LTN Area A	None	N/A
Bounds Green LTN Area B	West side of Trinity Primary Academy School Street removed, east side retained	To prioritise the section where the school is located, allowing the west side to be accessed by motor vehicle for those who need to arrive by motor vehicle. West side may be introduced at a later date, subject to monitoring.
	Clarence Road between Truro Rd and Nightingale Rd to remain two way but at both ends to be signed as No Motor Vehicle with an Except for access plate, retaining access for emergency services.	This section of Clarence Road is too narrow to accommodate large vehicles once Truro Road and Nightingale Road filters are implemented. The proposed change protects the road from being used by motor vehicles simply as a

		through route whilst allowing access to residents who reside along it.
	Cycle hangar on Thorold Road moved	An alternative location for the bike hangar has been recommended as the location consulted upon may be requested to be considered for a disabled parking bay.
	Marlborough Road filter moved to junction and changed to emergency access filter	In response to emergency services request, to support place function and to support refuse access
	Zebra crossing on Green lanes north of junction with Myddleton Road now not recommended to be implemented. Instead a signalised crossing for pedestrians to be considered in its place or at just north of junction with Sidney road	There is not sufficient space on the carriageway to accommodate a central island which is necessary for safety. Due to the presence of bus stops and or bus lanes which may impede on sightlines, a signalised crossing is more appropriate. The exact location to be determined following feasibility study and approval from TfL.
Bounds Green LTN Area C	None* *The St Martin of Porres Primary School Street will needed to be shortened to only cover Blake Rd from Churston Gardens at the northern end if Cabinet does not approve the Bounds Green LTN filters within Area C.	N/A

Appendix 2

Stakeholder groups contacted in 2021

Disability Action Haringey	Venture Club for the Blind and Partially Sighted
Network for LGBT+ planning professionals	Haringey Phoenix Group (services for visually impaired people)
Mobility and Seating Solution Centre (MSSC)	RNIB
Wheels for Wellbeing	Guide Dogs
Transport for All	JDA - deaf and hard of hearing
The Alzheimer's Society Enfield	Mind Haringey
Enfield Disability Action	Haringey Learning Disabilities Centre
Enfield Vision	Haringey Autism
Bowes and Bounds Green connected	Young Onset Dementia Support Group (YoYo)
Bowes Park Community Association	Haringey Over Fifties
Three Avenue's Residents' Association	Haringey LGBT Forum
Friends of the Green Bounds Green	Gingerbread Haringey
Bounds Green Window Show	Haringey Families
Friends of Springfield Community Park Nature Area	Miller Memorial Methodist Church
Waste Not Bounds Green	Christ Apostolic Church Outreach DDC HQ
Bounds Green North Community	Igreja Evangelica Avivamento Da Fe
Alexandra Low Traffic Group SGV Cancer Support	Potters House Christian Fellowship
	Assunah Islamic Centre

Age UK Haringey & Enfield

DRS Care Homes

Trinity Heart Care homes

All people all places

North London action for the homeless

The Community Hub

The Bridge Renewal Trust

Bounds Green Foodbank

Bounds Green Mutual Aid

Carers First Haringey