

# CABINET MEMBER SIGNING

**Monday, 25th July, 2022, 10.00 am**

**Members:** Councillor Mike Hakata – Cabinet Member for Climate Action, Environment, and Transport and Deputy Leader of the Council

## **1. APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

## **2. DECLARATIONS OF INTEREST**

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

## **3. LOW TRAFFIC NEIGHBOURHOODS EXEMPTIONS (PAGES 1 - 146)**

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Friday, 15 July 2022

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**Report for:** Cabinet Member Signing – 25 July 2022

**Title:** Low Traffic Neighbourhoods Exemptions

**Report**

**authorised by:** David Joyce, Director of Placemaking and Housing, and Eubert Malcolm, Interim Director of Environment & Neighbourhoods

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

**Ward(s) affected:** All

**Report for Key/**

**Non-Key Decision:** Key Decision

**1. Describe the issue under consideration**

- 1.1 On 7 December 2021, as part of the Council's ambitious Streets for People initiative, Cabinet approved three Low Traffic Neighbourhoods (LTNs) to be implemented on a trial basis under experimental traffic orders (ETOs): Bounds Green; Bruce Grove West Green; and St Ann's. As part of these decisions, Cabinet approved a series of exemptions to the non-hard closure filters in the LTN experimental schemes including for Blue Badge holders and special education needs and disabilities (SEND) transport. It was stated within the Cabinet reports that exemptions would be subject to an application process and exact criteria would follow in due course. It was also stated that there would be a separate route to obtain an exemption through an exceptional circumstance dispensation. In advance of the three LTNs being implemented in Summer 2022, this report seeks approval of the specific criteria and applications process that will apply in relation to the already agreed exemptions.
- 1.2 The Council's adopted Walking and Cycling Action Plan (WCAP) sets out a policy to deliver a network of LTNs across the borough as part of Haringey's Streets for People programme. The exemption criteria and application process set out in this report is proposed to apply to all Streets for People schemes going forward in which filtering of road is a key component including all LTNs.
- 1.3 Bounds Green LTN, Bruce Grove West Green LTN and St Ann's LTN are the first 3 LTNs to be implemented by the Council and are being installed on a trial basis. All properties within the LTNs will remain accessible by motor vehicle but the way certain properties are accessed will change. Experience of other LTNs in London has shown overall reductions in vehicular traffic volumes over time but with variance on certain roads and at certain times. By reducing the number of motor vehicles in and around the LTNs it is hoped that journey times will improve or stay the same benefitting those who need to make essential

journeys by car. However, some roads, especially as the schemes bed in, may see an increase in traffic volumes, especially at peak hours. The LTN exemptions have been developed to provide mitigation for people and groups who are more reliant on car travel and would be adversely affected by slower and/or longer journeys as a result of an LTN. As part of the trials, the Council will keep the exemption approach in this report under review and, when it takes a decision as to whether or not to make the trial LTNs permanent, it will consider the need to amend the exemptions approach.

## **2. Introduction**

- 2.1 Low Traffic Neighbourhoods (LTNs), alongside the building of energy-efficient, truly affordable, environmentally friendly housing designed for community life, are arguably the most far-reaching and effective infrastructure programmes for tackling systemic inequalities.
- 2.2 LTNs are all about turning the clock back to a time before the advent of GPS and SatNav when our residential roads were not used as through-routes by motor traffic. In the last decade, road traffic on quiet residential roads has doubled, just as car ownership has risen by over 10m nationally. These increases have been accompanied by exponential growth in air pollution and the associated health impacts. The traffic on once-quiet residential roads is also linked to social isolation as well as inactivity, both linked to increases in people suffering from depression and physical health conditions such as obesity, diabetes, and heart conditions. Haringey is a deeply unequal borough when it comes to health with people living in the East having, on average, 15 fewer years of good health.
- 2.3 Our lowest income households have the highest levels of non-car ownership. 60% have no car access, disproportionately affecting black residents and those from ethnic minorities, as well as women, children and young people. Exposure to traffic-related pollutants has a massive negative impact on people's health with traffic-related pollution associated with the risk of death and chronic disease, worse pregnancy outcomes, and exacerbation of asthma and chronic chest illnesses. Nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>2.5</sub>) emitted from vehicle exhausts and brake gear and tyres are principal sources of pollutants that impact on health. The Royal College of Physicians stated that the latter two pollutants are responsible for around 40,000 deaths annually in the UK.
- 2.4 There is also a strong relationship between deprivation and the number of road traffic collisions and deaths, with black children at least 1.5 times more likely to be seriously injured.
- 2.5 Car-ownership is also lowest among disabled residents and unsafe, congested roads and speeding considered one of the greatest obstacles to being able to participate in active travel solutions and are responsible for greater amounts of inactivity and social exclusion. The 'Pave the Way' report published by Transport for All revealed that low-traffic neighbourhood schemes were often perceived by many people with disabilities as problematic and divisive.

However, the perceived negative impacts were not borne out by data. Although there are several examples of increases in traffic on some boundary roads, the data repeatedly reveals a reduction in journey times in and around LTN areas, safer environments within LTNs which benefit those with hearing and visual impairments. The main issue for people with disabilities has been the lack of engagement and the very real sense that their needs have not been considered when rolling out schemes, especially in mitigating against potential negative impacts. That is why Haringey has taken the unprecedented steps of not only inviting feedback and comment from disabled people, groups and carers but in developing these comprehensive and detailed procedures which will complement the roll-out of our schemes from the very start. We have worked with other boroughs across North London (as well as engaging focus groups) to devise a scheme for exemptions which can be 'road-tested' throughout the consultation phase of the roll-outs to assess their effectiveness. The procedures can be refined during this time and improved and amended in the future, if and when the schemes are made permanent.

- 2.6 LTNs are Streets for People interventions aimed at addressing some of the systemic inequalities in our borough, promoting active travel for all and social cohesion for all. There is much more we need to do to truly make our streets more equitable, such as multiplying dropped kerbs, safe crossings, pedestrian-prioritised junctions and inclusive protected cycle lanes. But, whilst these are all critical, only LTNs can make dramatic transformative changes over such large geographical areas. We need streets for all people, and it is essential that, as we progress to this, those who are mobility-impaired are not further disadvantaged whilst any imperfections in those interventions are present. That is the purpose of the exemptions approach outlined in this report.

### **3. Recommendations**

The Cabinet Member is recommended:

- 3.1. To agree the Low Traffic Neighbourhoods Exemption Criteria and Applications Process as set out at Appendix A for the three Low Traffic Neighbourhoods authorised by Cabinet on 7 December 2021 and all future Low Traffic Neighbourhoods.
- 3.2. To agree to delegate to the Director of Environment and Neighbourhoods the approval of an application form in relation to the agreed Exemption Criteria and Applications Process.
- 3.3. To agree to delegate to the Director of Environment and Neighbourhoods authority to approve changes to Appendix A as part of the ongoing monitoring of the Exemption Criteria during the experimental period of the Traffic Management Orders for Bounds Green, Bruce Grove West Green and St Ann's Traffic Management Orders and for all future Low Traffic Neighbourhoods.

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

- 4.1 The LTN Exemption Criteria and Applications Process discharges the commitment in the December 2021 Cabinet Reports for Bounds Green LTN, Bruce Grove West Green LTN and St Ann's LTN respectively to provide further detail on the exemptions which will be available in relation to the LTNs. The approach makes reasonable adjustments to Blue Badge holders and others with access and disability needs and supports the Council's objective to advance equalities as far as possible.
- 4.2 The LTN Exemptions Criteria and Applications Process will apply to all LTNs delivered in the borough going forward and provides a borough-wide framework in respect of LTN exemptions.
- 4.3 The decision will enable an application form to be developed and made available online in relation to the agreed exemptions criteria and applications process.

## **5. Alternative Options Considered**

- 5.1 The alternative options available to the Council are:

**Option 1:** Not to approve the LTN Exemptions Criteria and Applications Process. This option is rejected because: it would not discharge the commitment in the December 2021 Cabinet reports for Bounds Green LTN, Bruce Grove West Green LTN and St Ann's LTN to provide further detail on the exemptions which will be available in relation to the respective LTNs; and it would mean that the borough's first tranche of LTNs is implemented without appropriate clarification for the Council and residents and communities about exemptions that are available for the LTNs and the process to apply for them.

**Option 2:** Approve an alternative LTN Exemptions Criteria and Applications Process. The December 2021 Cabinet Reports for the Bounds Green LTN, Bruce Grove West Green LTN and St Ann's LTN set out a framework for the exemptions which would be applied to the respective LTNs. The LTN Exemptions Criteria and Applications Process set out in this report has been prepared consistent with the agreed framework. The option to offer exemptions based solely on protected characteristics is not recommended as it has numerous disadvantages. As most protected groups are broadly defined, they fail to recognise the nuanced mobility needs and capabilities of different subgroups (e.g., elderly people with different levels of mobility and fitness, disabled people that would benefit from active travel etc). Additionally, some people that would not necessarily fall within these categories would still benefit from an exemption, such as people suffering from short-term serious health conditions or receiving specialist care that require travel by car for a limited period. Exemptions based solely upon protected characteristic would not reflect the fact that many people in these groups do not rely on or, in fact, are not capable of driving, and would risk undermining the LTN objectives from which these people will benefit. In addition, a different Blue Badge holder exemption within the LTN Exemptions Criteria and Applications Process is not being recommended (i.e., more than one vehicle per Blue Badge holder) because the complementary individual circumstance exemption will ensure that, where

additional vehicle exemptions are required, these can be obtained (subject to appropriate evidence and justification).

## **6. Background**

### **Low Traffic Neighbourhoods**

- 6.1 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 reducing 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 motor vehicles to drive along a street. Modal filters can 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.
- 6.2 The major effect of introducing an LTN is that it alters vehicle travel behaviour. 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. 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 planned and designed and the extent of engagement and consultation which is undertaken.
- 6.3 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.

- 6.4 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 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 considered as part of the design process of an LTN.
- 6.5 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 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.

#### **Approval of Haringey LTNs and related exemptions and previous community engagement**

- 6.6 On 7 December 2021, Cabinet approved three Low Traffic Neighbourhoods to be implemented on a trial basis: Bounds Green; Bruce Grove West Green; and St Ann's. At the same time, Cabinet also agreed a series of exemptions to apply to the three LTNs.
- 6.7 The recommendations approved by the Cabinet in relation to the exemptions for Bounds Green are set out below, with the same approved for Bruce Grove West Green and St Ann's:

*That Cabinet:*

*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 disability*

*to non-hard closure filters in the Bounds Green LTN experimental scheme as per paragraph 6.77 of this report.*

- 6.8 A separate section in the reports under the heading 'Exemptions' (paras 6.73 to 6.83 in the Bounds Green report and contained with the other two reports with different para numbers) provided further detail and context and the approach to exemptions. Key paragraphs are copied below:

*6.73 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.*

6.77 *On the basis of the above, and to ensure the Bounds Green 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 Bounds Green LTN experimental scheme:*

- Blue Badge holders living within the Bounds Green 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*

6.78 *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.*

6.79 *The exemptions will be subject to an application process and exact criteria will follow in due course.*

6.80 *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.*

#### *Previous community engagement*

6.9 It is noteworthy that significant engagement and consultation took place on each of three LTNs approved by Cabinet. Over the course of a year, each of the LTNs was subject to three discrete engagements as well as numerous additional engagements with key stakeholders.

6.10 The decision to proceed with the agreed exemptions was informed by a significant amount of feedback received from the engagements and a direct consequence of the extensive listening the Council did, including via a Disabled People and Carers Survey. In addition, the decision to proceed with the exemptions was informed by a detailed and iterative Equalities Impact Assessment (EqIA) which assessed the likely impacts of the proposals on groups with protected characteristics, as defined by the Equality Act 2010.

### **Haringey LTN Exemption Criteria and Applications Process**

6.11 Since December 2021, further consideration has been given to an approved exemptions approach and the related criteria and application process. Engagement has taken place with a range of key stakeholders and a specific piece of work on LTN exemptions has been undertaken with 3 other North London boroughs which included: a literature review; research on the exemptions approaches of other local

authorities; engagement with stakeholders covering a broad range of categories; an appraisal of potential exemptions and related criteria; and consideration of a potential applications process and back-office implications.

- 6.12 Arising from this, key considerations for the exemption criteria and applications process were identified as follows:

**Case for LTNs/key principles:** LTNs are required to deliver the objectives set out in the Council's adopted Transport Strategy (2018) and adopted Haringey Walking and Cycling Action Plan (2022). They are being implemented as part of the Council's ambitious Streets for People initiative and are needed across the borough to 1) reduce pollution, especially NO<sub>2</sub> 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.

**Equalities:** Equality Impact Assessments (EqIAs) of the three approved LTNs assessed the likely impacts of the LTNs and complementary measures on groups with protected characteristics as defined by the Equality Act 2010. These found that the proposals will advance equalities for many protected groups with a disadvantage noted for those solely reliant on motor vehicles for transport. This potential disadvantage was noted for some individuals in the following groups: young people with SEND, older people, disabled people, carers, and pregnant people. To ensure the three LTNs would advance equality as far as possible, the Council approved numerous exemptions to non-hard closure filters in the LTNs, including an 'exceptional circumstance dispensation'. In the latter connection, there is a need to balance the equalities benefits of providing particular exemptions versus the benefits of minimising exemptions such that an LTN provides 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 and will have corresponding positive impacts for certain groups with protected characteristics.

**Practicalities:** Potential exemptions approaches must be considered having regard to their practicality of administering, managing and enforcing them for residents and also taking account of the Council's current back-office systems and processes and available resource. Save for readily identifiable vehicles like emergency service vehicles, the granting of exemption relies on the Council having a vehicle registration number registered on the appropriate filters' ANPR cameras on the day of the vehicle driving through the filter. Where a regular vehicle is used by an individual then this can be easily administered by the Council. In contrast, it would be much more complex for the Council to provide exemptions for someone who travels via a different taxi/private hire vehicle every day and the registration numbers are not known in advance. It is also

noteworthy that once exempt the Council cannot distinguish between who is making that journey and for what purpose.

- 6.13 Taking account of the above considerations and consistent with the expectation set out in the December 2021 Cabinet reports that further information would follow to Cabinet in relation to the approved exemptions, a Haringey LTN Exemptions Criteria and Applications Process has been prepared for approval (Appendix A).
- 6.14 The Haringey LTN Exemptions Criteria and Applications Process is proposed to apply to all LTNs delivered in Haringey, beginning with the Bounds Green LTN which will be implemented in Summer 2022.
- 6.15 The exemptions contained within the document do not apply to School Streets which are subject to a separate exemptions approach as detailed on the Council's website.
- 6.16 The Haringey LTN Exemptions Criteria and Applications Process provides the following exemptions:
1. Emergency service vehicles
  2. Council refuse and cleansing vehicles
  3. Blue Badge holders living within or on the immediate boundary of an LTN
  4. Special Educational Needs and Disabilities (SEND) transport
  5. Haringey Council services and commissioned services 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
- 6.17 The below sections summarise the proposed exemptions approach and, where relevant, the justification.

*Emergency services exemption*

- 6.18 The Cabinet reports for the three approved LTNs state that the experimental traffic management order for the LTNs will exempt all emergency service vehicles. This exemption will apply to all camera filters in all LTNs (i.e. borough wide).
- 6.19 Of note, the Council has carried out a significant amount of additional engagement with the emergency services following the December 2021 Cabinet decisions. In the process of drawing up the detailed engineering drawings for the three LTNs, there has been significant dialogue about the location and type of filters. A number of detailed changes to the agreed designs are proposed as result of that engagement, including changing some hard-closure filters to camera-controlled filters. These changes are due to be considered for approval by the Director for Environment and Neighbourhoods via a separate delegated authority report, consistent with the agreed delegation recommendation in the Cabinet reports for the approved LTNs.

*Council refuse and cleansing vehicles*

- 6.20 The Cabinet reports for the three approved LTNs state that the experimental traffic management order for the LTNs will exempt the Council's refuse services. It is proposed that Council cleansing vehicles be added to this exemption category. This exemption will apply to all camera filters in all LTNs (i.e. borough wide). The exemption will be limited to vehicles which are used for refuse and cleansing purposes and does not cover all vehicles which are used by the service.

*Blue badge holders living within or on the immediate boundary of an LTN*

- 6.21 The exemption recommendation approved by Cabinet in December 2021 refers to the "Blue Badge holder". Exemptions cannot be provided to a Blue Badge holder per se and must be linked to a specific vehicle or vehicles. The LTN Exemptions Criteria and Applications Process in Appendix A provides further detail in relation to the approved Cabinet recommendation, specifying that Blue Badge holders living within or on the immediate boundary of an LTN will be permitted to register a single motor vehicle for exemption for that LTN, or where the LTN constitutes discrete areas (e.g. Area A, B and C), the exemption will be for the part of the LTN in which they live/live on the boundary of.
- 6.22 The immediate boundary of an LTN is defined as the roads or parts thereof which face directly onto the LTN. For the purposes of the exemption, addresses on both sides that face the boundary road are included as part of the immediate boundary.
- 6.23 The vehicle would not need to be registered to their own address or owned by the Blue Badge holder. This is because engagement showed that many people with Blue Badges don't own a car and rely on a car registered at another address.
- 6.24 The granting of the exemption will be automatic provided that the necessary evidence is supplied including proof of address and Blue Badge status. On successful application, written notification of the vehicle exemption will be provided, which will allow the Blue Badge holder to drive, or be driven, through designated camera-enforced filters within the LTN.
- 6.25 The exemption is limited to the home LTN of the Blue Badge holder or part of their home LTN where the LTN constitutes discrete areas. Exemptions for other LTNs or other areas of the home LTN would need to be sought via the individual circumstance exemption.
- 6.26 The exemption is limited to a single vehicle per Blue Badge holder. The option of a default exemption for more than a single vehicle was considered but rejected as, where exemption for an additional vehicle is needed and the need can be adequately demonstrated, this can be secured via the individual circumstance exemption.
- 6.27 It is noted that Blue Badges are designed for parking purposes rather than for travel purposes. There are people who qualify for a Blue Badge but who have not applied for one and others who consider themselves disabled but for a variety of reasons do not have a Blue Badge. Individuals with these circumstances would be required to apply for an exemption via the individual circumstance exemption.

- 6.28 The Blue Badge exemption only includes filters which have an exemption permit plate. It therefore excludes a small number of filters e.g., diagonal filters where, for safety purposes, access is provided for emergency vehicles or council refuse and cleansing vehicles that could not otherwise turn around.
- 6.29 The proposal to enable Blue Badge holders to register a single motor vehicle complemented by an individual circumstance exemption category is considered to be a fair and proportionate response which will help mitigate potential impacts of the LTNs on Blue Badge holders whilst, at the same time, preserving the integrity of the LTNs in terms of appropriately managing vehicular movements through filters and not undermining some of their key benefits which are to reduce through traffic and create a safer environment to walk, cycle, wheel, etc. It is worth noting that disabled people don't always drive or are passengers in vehicles - some also walk and, for some, the preferred means of getting around is through cycling using an adapted bike.

*Special Educational Needs and Disabilities (SEND) transport*

- 6.30 The exemption recommendation approved by Cabinet in December 2021 refers to "SEND transport". SEND transport is intended to facilitate attendance at school and is not intended to cover any travel between educational institutions during the school day; or any travel to and from social or child care arrangements or at other times.
- 6.31 The Exemptions Criteria and Applications Process provides further detail in relation to the approved Cabinet recommendation. It specifies that exemptions will be provided for SEND transport organised by the Council, wherever practicable. In order to effectively administer exemptions, it is necessary to know the vehicle registration(s) in advance of the journey through the LTN filters. As a minimum, exemptions will be provided for vehicles which are part of the regular SEND vehicle fleet. Exemptions will also be available for home to school transport organised and paid for by the Council where this is part of a regular arrangement involving the same vehicle or vehicles. The exemption applies to all LTNs but only includes filters which have an exemption permit plate. It may therefore exclude some LTN filters e.g., diagonal filters where general vehicular access may not be safe.
- 6.32 Exemptions will not automatically be available for SEND transport organised and paid for by the Council via black cabs/private hire or for ad hoc services organised by the Council. This would be very complex to administer, manage and enforce and there is a key issue which is that the vehicles exempted would also be making non-SEND transport journeys at other times and there is no way to distinguish between journeys. Officers from Highways and Children Services will work in partnership to explore solutions to the challenge of exempting ad hoc SEND services.
- 6.33 Exemptions will not be available in this category for privately organised transport for SEND children (including where they get travel funding and where they do not). However, exemptions in this regard can be applied for via the individual circumstance exemption (provided that such transport is via the same vehicle on a

regular basis). The Council holds information on who these children are and will seek to contact their parents/carers to advise of the opportunity to apply for an individual circumstance exemption.

- 6.34 Exemptions will not be available in this category for parents/carers who live outside Haringey and transport children to SEND schools in Haringey. The Council does not have information regarding these children. The Council will contact SEND schools in the borough and ask them to contact these parents to advise them of the opportunity to apply for an individual circumstance exemption.

*Haringey Council services and commissioned services transporting people with a disability and Transport for London's Dial-a-Ride service*

- 6.35 The exemption recommendation approved by Cabinet in December 2021 refers to "Essential Haringey Council services catering for people with a disability". The Exemptions Criteria and Applications Process provides further detail in relation to the approved Cabinet recommendation. It specifies that Haringey Council organised or commissioned services for the transporting of people with a disability will be exempted (wherever practicable) and Transport for London's Dial-a-Ride service. As a minimum, this exemption category will include Council organised minibuses transporting adults with profound and multiple learning disabilities (PMLD) and learning disabilities. Exemptions will also be available for vehicles of external organisations where these have been commissioned by the Council to transport people with a disability (e.g., Development and Learning Opportunities Ltd) and where this is part of a regular arrangement involving the same vehicle or vehicles. Exemptions will be provided for Transport for London's Dial-a-Ride service via visual vehicle identification.
- 6.36 The exemption applies to all LTNs within the borough but only applies at those filters which state "except for permit holders". It may therefore exclude some traffic filters e.g., diagonal filters where general vehicular access may not be safe.
- 6.37 The exemption does not include any other organisations that need to transport individuals or groups with a disability. There is an opportunity for organisations that solely transport people with access or disability needs to apply for an individual circumstance exemption.

*Any other vehicles required for urgent safety matters with the permission of the Council*

- 6.38 A new exemptions category is proposed for exemption of any other vehicles required for urgent safety matters with the permission of the Council. This could, for instance, include a vehicle which requires access to carry out a repair to a dangerous structure that could not necessarily access the structure via unconstrained routes within the LTN.

*Individual circumstance exemptions*

- 6.39 The exemption recommendation approved by Cabinet in December 2021 refers to "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.” The Exemptions Criteria and Applications Process provides further detail in relation to the approved Cabinet recommendation.

- 6.40 As a starting point, it is recommended that the exceptional circumstance dispensation is renamed to “individual circumstance exemption”. As part of the engagement with stakeholders on potential exemptions, clear feedback was received that the original terminology was not appropriate and it risked singling out disabled people and people with other access needs. It has consequently been amended to be more inclusive.
  
- 6.41 The Council’s engagement and the specific piece of work on LTN exemptions that was undertaken with 3 other North London boroughs and included engagement with community groups showed that some protected groups have a higher reliance on car travel for their mobility (namely age, disability, pregnancy and maternity and sex). It is, however, considered that exemption approaches based solely around protected characteristics have numerous downsides. As most protected groups are broadly defined, they fail to recognise the nuanced mobility needs and capabilities of different subgroups (e.g. elderly people with different level of mobility and fitness, disabled people that would benefit from active travel). Additionally, some people that would not necessarily fall within these categories would still benefit from an exemption, such as people suffering from short-term health conditions or receiving specialist care that require to travel by car for a limited period. Exemptions solely based upon protected characteristics would not reflect the fact that many people in these groups do not rely on or, in fact, are not capable of driving, and would risk undermining the LTN objectives which, in turn, would also have negative impacts on both protected groups and non-protected groups. While specific mobility needs of protected groups more reliant on car travel requires consideration when developing exemptions criteria, basing the exemption criteria solely on protected characteristics is not recommended.
  
- 6.42 A Blue Badge can give people exemptions from some parking restrictions and access to designated parking spaces. To qualify for a Blue Badge, applicants need to demonstrate they have a disability or condition that affects their ability to walk. There are other circumstances when an individual can be eligible for a Blue Badge, on a case-by-case basis, such as having difficulty walking because of dementia, mental health problems, or having a terminal illness.
  
- 6.43 People who have difficulty walking are likely to be heavily reliant on car travel because of their mobility issues. As such, they may be negatively impacted by longer journeys if not provided with access to certain LTN filters. However, people with mobility impairments and difficulty in walking are not the only group negatively impacted by longer journeys or re-routing of trips. The stakeholder engagement exercise identified a number of groups that should be considered for an exemption, but that may not have a Blue Badge.
  
- 6.44 While implementing an exemption applications process for Blue Badge holders is relatively straightforward, granting exemptions for people falling in other categories and who may not have a Blue Badge presents more challenges, as some conditions may be self-defined and may be difficult to verify or certify.

- 6.45 Experience from other councils in London who have implemented LTNs has highlighted the importance of regular short journeys for people falling in the above categories as well as the potentially disproportionate impact of LTNs on these, a theme also picked up through stakeholder engagement. These types of journeys may be undertaken by people with a disability, carers, children being transported to/from school or another location amongst other groups. It is considered that the reducing the impact of the LTNs on these trips should be at the heart of the exemptions approach, as opposed to being framed around assessing a person's specific condition or circumstance.
- 6.46 Taking this into account, it is recommended that the individual circumstance exemption is eligible to the following, 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.
- 6.47 The above approach is considering to be the most appropriate one balancing the key considerations set out in paragraph 6.12 and allows for key circumstances such as: 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.
- 6.48 Despite stakeholder feedback that exemptions for taxis and other private hire vehicles are important means of transport for some disabled people and other people with access needs, it is not currently feasible or practical for the Council to administer, manage and enforce exemptions where the transport is arranged on an ad hoc basis and the vehicles are subject to regular change and advance notice cannot be provided of the registration details. It is also the case the vehicles exempted would also be making transport journeys at other times with other occupants in the car that do not require an exemption and there is no way to distinguish between journeys. As such, taxis and other private hire vehicles are not included as part of the LTN Haringey Exemptions Criteria and Applications Process. As the roll out of LTNs across the borough progresses, consideration will be given to how such an exemption could be managed in the future.
- 6.49 The individual circumstance exemption will be subject to an application process. As part of the application process, the applicant will need to:



- 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;
- 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.

6.50 The Council will develop an application form in relation to the individual circumstance exemptions. It is recommended that the approval of this is delegated to the Director of Environment and Neighbourhoods. The Council subscribes to the social model of disability which states that people are disabled by barriers in society, not by their impairment or difference. It is important, therefore, that the application process for an exemption does not provide an unnecessary barrier to people. At the same time, however, it needs to be balanced against the need for applicants to properly evidence and justify the requirement for an exemption so as not to risk undermining the aims of LTNs. To help ensure the application process is as user-friendly as possible, the application form will include a tick box enabling the applicant to grant the Council permission to cross-check its current records for evidence purposes (e.g., proof of address). This will limit the need for applicants to supply information where the Council already holds it and address any related GDPR issues at the same time. The application form will be web-based. However, it will also be available to complete over the telephone with officers available to provide assistance, as required.

6.51 The application form will be focused on key details of the journeys impacted by the LTN or LTNs, such as the journey origin, the destination, the essentialness of the journeys, the journey duration, the time of day in which the journey must be made and the frequency of the journey.

6.52 Where an application is successful, the Council will confirm this in writing to the applicant, including providing details of the scope and extent of the given exemption that has been granted. This will either be linked to the expiry of the Blue Badge (at which point revised Blue Badge details would need to be provided) or time-limited to one year for non-Blue Badge owners. Where an application is unsuccessful, the Council will confirm this in writing to the applicant, including providing details of why it has been refused. There will be an appeals process for applications which have been refused. Further details are provided in Appendix A.

### **Co-design and community engagement for the LTN Exemptions Criteria and Applications Process**

6.53 As set out in paragraphs 6.9, 6.10 and 6.11, the LTNs have been subject to three discrete engagements (including numerous additional engagements with key stakeholders and a Disabled People and Carers Survey) and the LTN Exemptions Criteria and Application Process has since been informed by further significant

engagement and consultation including with people with disabilities and other access needs.

- 6.54 It has been prepared such that the exemptions criteria and applications process is in place on day 1 of the Council's first LTN being delivered (Bounds Green, expected in Summer 2022). The approach of having this in place on day 1 is very uncommon in a London-wide context. Research of other boroughs has shown that, in many cases, LTNs have been delivered at scale with often only very limited exemptions and without a fully worked up exemptions approach which includes an individual circumstance exemption. The comprehensive approach proposed in this report and set out in Appendix A goes beyond any other borough that officers are aware of.
- 6.55 Bounds Green LTN, Bruce Grove West Green LTN and St Ann's LTN are the first 3 LTNs to be implemented by the Council and are being installed on an initial trial basis via experimental traffic orders (ETOs). ETOs are schemes introduced as an experiment to see what their effects are and can be changed if necessary.
- 6.56 All properties within the LTNs will remain accessible by motor vehicle but the way certain properties are accessed will change. Experience of other LTNs in London has shown overall reductions in vehicular traffic volumes over time but with variance on certain roads and at certain times. By reducing the number of motor vehicles in and around the LTNs the expectation is that journey times will improve or, at worst, have marginal differences, thereby benefitting those who need to make essential journeys by car. However, some roads, especially as the schemes bed in, may see an increase in traffic volumes, especially at peak hours. The LTN exemptions have been developed to mitigate against this eventuality.
- 6.57 During the period in which the ETOs are in force, the Council will closely monitor the impacts of the experimental schemes, both through a comprehensive monitoring strategy and further engagement with the community and key stakeholders. As part of this the Council will seek feedback on the exemptions criteria and application process. 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 LTN Exemptions Criteria and Applications Process.

### **Communication of Exemptions Criteria and Applications Process**

- 6.58 To ensure residents and stakeholders are adequately informed about the LTNs prior to implementation, the Council will be writing to all residents and businesses in or on the boundary of the LTNs with relevant updates. This will include notification of the Exemptions Criteria and Applications Process.
- 6.59 The Council's LTN webpages will also be comprehensively updated to ensure that visitors have all the information they need on the LTNs, including in relation to exemptions.

### **Resource implications**

- 6.60 The implementation of 3 x LTNs will have a variety of resource implications for the Council. In regard to this specific report, there will be resource implications of administering, managing and enforcing the recommended exemptions. It is not possible to predict with certainty how many applications will be received for exemptions, but, in any event, there is expected to be a significant impact on the Highways service back-office which will need to be managed. As the proposed exemptions are time-limited and will need to be reviewed periodically there will be an ongoing resource implication rather than just a one-off implication.

## **7 Contribution to strategic outcomes**

- 7.1 The approved LTN experimental schemes and complementary measures will support the 'Place' Priority of the Borough Plan 2019-23 and the delivery of key Council strategies including the Transport Strategy, Walking and Cycling Action Plan, Climate Emergency Action Plan, Air Quality Action Plan, and School Streets Plan. The Haringey LTN Exemptions Criteria and Applications Process will support Place Priority 10a to "Provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users" as well as the equality principles outlined in the Borough Plan to reduce inequality.

## **8 Statutory Officer Comments (Director of Finance (including procurement), Head of Legal and Governance (Monitoring Officer), Equalities)**

### **Finance**

- 8.1 The report is recommending the adoption of the Low Traffic Neighbourhoods Exemption Criteria and Applications Process as set out at Appendix A for the three LTNs authorised by Cabinet on 7 December 2021 and all future LTNs. Due to the lack of clarity on the number of exemptions that are likely to be made, it is not possible to accurately estimate the cost of administering the exemptions. At this stage it is estimated that the cost can be contained within existing budgets within the parking account.

### **Procurement**

- 8.2 N/A

### **Legal**

- 8.3 The legal comments for the making of the three LTNs mentioned in this report are contained in the Cabinet Reports of 7 December 2021. The Cabinet also authorised exemptions to Blue Badge holders living within the LTN or on its immediate boundary; Special Educational Needs and Disabilities (SEND) transport and Essential Haringey Council services catering for people with a disability. The details of the exemptions (together with the application process) that would apply to all LTNs are now contained in Appendix A of this report. The Cabinet Member has the authority in the constitution to authorise the recommendations contained in this report.

- 8.4 The three LTNs will be via Experimental Traffic management Orders (ETMOs) pursuant to section 9 of the Road Traffic Act 1984. Under regulation 6 of the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996, various bodies need to be consulted prior to the making of the ETMOs.

### **Equality**

- 8.5 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.
- 8.6 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.
- 8.7 The Council's adopted Walking and Cycling Action Plan sets out a policy to deliver a network of LTNs across the borough. In December 2021 the Council approved its first three LTNs to be implemented on a trial basis: Bounds Green, Bruce Grove West Green and St Ann's). Detailed EqlAs were prepared in support of the decisions to implement Bounds Green, Bruce Grove West Green and St Ann's LTNs. These found that the proposals for the LTNs and associated complementary measures will advance equalities for many protected groups with a disadvantage noted for those solely reliant on motor vehicles for transport. This potential disadvantage was noted for some individuals in the following groups: young people with SEND, older people, disabled people, carers, and pregnant people. Having regard to these identified impacts, Cabinet approved a series of exemptions to the non-hard closure filters in the LTN experimental schemes including for Blue Badge holders and special education needs and disabilities (SEND) transport. It was stated within the Cabinet reports that exemptions would be subject to an application process and exact criteria would follow in due course. It was also stated that there would be a separate route to obtain an exemption through an exceptional circumstance dispensation. In advance of the three LTNs being implemented in Summer 2022, this report seeks approval of the specific criteria and applications process that will apply in relation to the already agreed exemptions. The LTN Exemptions Criteria and Applications Process will apply to all LTNs delivered in the borough going forward and provides a borough-wide framework in respect of LTN exemptions.
- 8.8 Since the Cabinet decisions the Council has done a robust exercise to arrive at the specific criteria and applications process that will apply to the already agreed exemptions. This has involved extensive research and a thorough

engagement exercise with key stakeholders and/or their representative groups. The key considerations which have informed the recommended exemption criteria and applications process are set out in paragraph 6.12 of the report. In short, these are:

- the strategic case for implementing LTNs and the benefits which will be derived from reduced traffic in the LTN areas, including for groups with protected characteristics;
- the objective for LTNs to advance equality as far as possible including the need to balance the equalities benefits of particular exemptions versus the benefits of limiting exemptions to the LTN such that they will 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 and will have corresponding positive impacts for certain groups with protected characteristics;
- the need to have regard to the practicality of administering, managing and enforcing potential exemptions approaches including taking account of the Council's current back-office systems and processes and available resource. Save for readily identifiable vehicles like emergency service vehicles, the granting of exemption relies on the Council having a vehicle registration number registered on the appropriate filters' ANPR cameras on the day of the vehicle driving through the filter. Where a regular vehicle is used by an individual then this can be easily administered by the Council. In contrast, it would be much more complex for the Council to provide exemptions for someone who travels via a different vehicle every day and the registration numbers are not known in advance.

8.9 Taking account of the above considerations and consistent with the expectation set out in the December 2021 Cabinet reports that further information would follow to Cabinet in relation to the approved exemptions, a Haringey LTN Exemptions Criteria and Applications Process has been prepared for approval (Appendix A). This provides for the following categories of exemptions and provides details:

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

8.10 The document provides specific details for each category about what will be exempt and what will not, taking account of the three considerations listed above. A particular focus of the document is on the individual circumstance exemption and how this will operate. It lists four circumstances where the

Council will grant exemptions subject to submission of appropriate evidence and justification. Individual circumstance exemptions will be subject to an application process with the onus on the applicant to demonstrate why an exemption is required.

- 8.11 The above approach 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. As such the Haringey LTN Exemptions Criteria and Applications Process is considered to have positive benefits for a range of groups with protected characteristics.
- 8.12 It is however noted that the LTN Exemptions Criteria and Applications Process is unable to remove all potential disadvantages which might occur to protected groups as a result of the LTN. While taxis and other private hire vehicles are important means of transport for some disabled people and other people with access needs, it is not currently feasible or practical for the Council to administer, manage and enforce exemptions where the transport is arranged on an ad hoc basis and the vehicles are subject to regular change and advance notice cannot be provided of the registration details. It is also the case the vehicles exempted would also be making transport journeys at other times with other occupants in the car that do not require an exemption and there is no way to distinguish between journeys. As such, in particular circumstances where people who would otherwise qualify for an exemption use taxis or private hire vehicles for particular journeys, it is considered that there may be a negative impact on groups with a protected characteristic. However, taking into account the complexities of managing a system of exemptions which could include taxis and private hire vehicles, this exclusion from the exemptions criteria is considered a proportionate means of achieving a legitimate aim.
- 8.13 The EqlAs for the Council's three approved LTNs (Bounds Green, Bruce Grove West Green and St Ann's) have been updated to reflect the recommended Low Traffic Neighbourhoods Exemption Criteria and Applications Process and the potential equalities implications have been assessed and analysed. The updated EqlAs are provided as Appendices B to D.

## **9 Appendices**

Appendix A: Low Traffic Neighbourhoods Exemption Criteria and Applications Process

Appendix B: Updated Bounds Green Equalities Impact Assessment

Appendix C: Updated Bruce Grove-West Green Equalities Impact Assessment

Appendix D: Updated St Ann's Equalities Impact Assessment

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

Cabinet report 7 December 2021: Bounds Green Low Traffic Neighbourhood.

Link: [Agenda for Cabinet on Tuesday, 7th December, 2021, 6.30 pm | Haringey Council](#) (item 676)

Cabinet report 7 December 2021: Bruce Grove/West Green Low Traffic Neighbourhood. Link: [Agenda for Cabinet on Tuesday, 7th December 2021, 6.30 pm | Haringey Council](#) (item 675)

Cabinet report 7 December 2021: St Ann's Low Traffic Neighbourhood. Link: [Agenda for Cabinet on Tuesday, 7th December 2021, 6.30 pm | Haringey Council](#) (item 677)

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# Low Traffic Neighbourhoods Exemptions: Criteria and Applications Process

July 2022

## **Introduction**

As part of the Council's ambitious Streets for People initiative, Haringey Council 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 Haringey Walking and Cycling Action Plan (2022).

The benefits of progressing LTNs are many in that they can:

- 1) reduce pollution, especially NO<sub>2</sub> 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, making safe welcoming, inclusive spaces for all residents.

On 7 December 2021, Cabinet approved an initial three LTNs to be implemented on a trial basis under experimental traffic orders: Bounds Green; Bruce Grove West Green; and St Ann's. As part of these decisions, Cabinet approved a series of exemptions to the non-hard closure filters in the LTN experimental schemes. This document sets out the criteria and applications process which will apply to the agreed exemptions.

The exemptions approach outlined in this document will apply to all Streets for People schemes going forward in which filtering of road is a key component including all LTNs (whether trial or permanent).

A separate exemptions approach applies to designated School Streets, including Schools Streets outside LTNs and those within.

## **Case for exemptions**

All properties within LTNs remain accessible by motor vehicle but the way certain properties are accessed may need to change. Experience of other LTNs in London has shown overall reductions in vehicular traffic volumes over time but with variance on certain roads and at certain times. By reducing the number of motor vehicles in and around the LTNs, it is hoped that journey times will improve or stay the same - benefitting those who need to make essential journeys by car. However, some roads, especially as schemes bed in, may see an increase in traffic volumes, especially at peak hours. The LTN exemptions have been developed to mitigate against this eventuality.

Equality Impact Assessments (EqIAs) of the Bounds Green, Bruce Grove West Green, and St Ann's LTNs assessed the likely impacts of the LTNs and complementary measures on groups with protected characteristics, as defined by the Equality Act 2010. The assessments

found that the LTNs and complementary measures promoted equality of opportunity among many protected groups, but a disadvantage was noted for those solely reliant on motor vehicles for transport. This potential disadvantage was noted for some individuals in the following groups: young people with special educational needs and disabilities (SEND); older people; disabled people; carers, and pregnant people.

To ensure the three LTNs advance equality as far as possible, the Council approved numerous exemptions to non-hard closure filters in the LTNs, including an exceptional circumstance dispensation (renamed as 'individual circumstance exemption' in this document, following stakeholder feedback). In the latter connection, there is a need to balance the equalities benefits of providing particular exemptions versus the benefits of minimising exemptions. The aspiration is that an LTN provides the safest possible environment for people to walk, wheel and cycle in (by significantly reducing motorised traffic), and reduces, as far as possible, congestion and air pollution, and has corresponding positive impacts for certain groups with protected characteristics

### **Exemptions**

The Council will provide the following LTN exemptions:

1. Emergency service vehicles
2. Council refuse and cleansing vehicles
3. Blue Badge holders living within or on the immediate boundary of an LTN
4. Special Educational Needs and Disabilities (SEND) transport
5. Haringey Council services and commissioned services 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 sections below set out the scope of these exemptions, the specific criteria which will apply to them and the related applications process.

Please note details of non-exempt forms of transport are not exhaustive.

#### *Emergency service vehicles*

<b>Exempt</b>	Police, fire, ambulance vehicles including the Hatzolah North West Ambulance Service
<b>Extent of exemption(s)</b>	All camera filters in all LTNs (i.e. borough wide).
<b>Application process</b>	None. Exemptions administered via visual vehicle identification
<b>Evidence requirement for exemption</b>	N/A
<b>Not exempt</b>	

#### *Council refuse and cleansing vehicles*

<b>Exempt</b>	Vehicles used for Council refuse and cleansing purposes
<b>Extent of exemption(s)</b>	All camera filters in all LTNs (i.e., borough wide).
<b>Application process</b>	None. Exemptions administered via visual vehicle identification or via prior vehicle registration notification to Council.
<b>Evidence requirement for exemption</b>	N/A
<b>Not exempt</b>	Private commercial refuse vehicles

*Blue Badge holders living within or on the immediate boundary of an LTN*

<b>Exempt</b>	<p>Blue Badge holders living within or on the immediate boundary of an LTN will be permitted to register a single motor vehicle for exemption for that LTN or, where the LTN constitutes discrete areas (e.g., Area A, B and C), the exemption will be for the area of the LTN in which they live/live on the immediate boundary of.</p> <p>The immediate boundary of an LTN is defined as the roads or parts thereof which face directly onto the LTN. For the purposes of the exemption, addresses on both sides that face the boundary road are included as part of the immediate boundary.</p> <p>The vehicle does not need to be registered to the Blue Badge holder's own address or owned or driven by them.</p>
<b>Extent of exemption(s)</b>	<p>The exemption is limited to the home LTN of the Blue Badge holder or part of their home LTN where the LTN constitutes discrete areas.</p> <p>The exemption only includes filters which have an exemption permit plate. It may therefore exclude some LTN filters e.g., diagonal filters where vehicular access would not be safe</p> <p>For the boundary roads, the exemption will apply to LTNs or part thereof immediately on either side of the boundary road.</p>
<b>Application process</b>	<p>The granting of the exemption will be automatic, provided that the necessary evidence is supplied to the Council</p> <p>The exemption will be linked to the expiry of the Blue Badge (at which point revised Blue Badge details would need to be provided) for the exemption to continue</p>

<b>Evidence requirement for exemption</b>	Proof of address Proof of Blue Badge status
<b>Not exempt</b>	<p>The exemption is limited to the home LTN of the Blue Badge holder or part of their home LTN where the LTN constitutes discrete areas. Exemptions for other LTNs or other area of the home LTN would need to be sought via the individual circumstance exemption.</p> <p>The exemption is limited to a single vehicle per Blue Badge holder. Exemptions for additional vehicles would need to be sought via the individual circumstance exemption.</p>

*Special Educational Needs and Disabilities (SEND) transport*

<b>Exempt</b>	<p>SEND transport organised by the Council (wherever practicable)</p> <p>Exemptions will be provided for vehicles which are part of the regular SEND vehicle fleet. Exemptions will also be available for home to school transport organised and paid for by the Council where this is part of a regular arrangement involving the same vehicle or vehicles.</p> <p>This exemption will not automatically be available for SEND transport organised and paid for by the Council via black cabs/private hire or for ad hoc services organised by the Council but officers from Highways Services and Children Services will work in partnership to explore solutions to the challenge of exempting these vehicles.</p>
<b>Extent of exemption(s)</b>	The exemption applies to all LTNs but only includes filters which have an exemption permit plate. It may therefore exclude some LTN filters e.g., diagonal filters where general vehicular access may not be safe
<b>Application process</b>	None. Exemptions administered via prior vehicle registration notification.
<b>Evidence requirement for exemption</b>	N/A

<b>Not exempt</b>	<p>Exemption under this exemption category is not available for privately organised transport for SEND children (including where they get travel funding and where they do not). However, exemptions in this regard can be applied for via the individual circumstance exemption (provided that such transport is via the same vehicle on a regular basis).</p> <p>Exemption under this exemption category is not available for parents/carers who live outside Haringey and transport children to SEND schools in Haringey. However, exemptions in this regard can be applied for via the individual circumstance exemption (provided that such transport is via the same vehicle on a regular basis).</p>
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*Haringey Council services and commissioned services transporting people with a disability and Transport for London's Dial-a-Ride service*

<b>Exempt</b>	<p>Haringey Council organised or commissioned services for the transporting of people with a disability (wherever practicable)</p> <p>Exemptions will be provided for vehicles which are part of the regular fleet transporting adults with profound and multiple learning disabilities (PMLD) and learning disabilities.</p> <p>Exemptions will be available for vehicles of external organisations where these have been organised or commissioned by the Council to transport people with a disability and where this is part of a regular arrangement involving the same vehicle or vehicles.</p> <p>Transport for London's Dial-a-Ride service</p>
<b>Extent of exemption(s)</b>	The exemption applies to all LTNs but only includes filters which have an exemption permit plate. It may therefore exclude some LTN filters e.g., diagonal filters where general vehicular access may not be safe
<b>Application process</b>	None. Exemptions administered via prior vehicle registration notification with the exception of Transport for London's Dial-a-Ride service which will be done via visual vehicle identification
<b>Evidence requirement for exemption</b>	N/A

<b>Not exempt</b>	<p>The exemption does not include services to transport people with a disability where these are not organised or commissioned by Haringey Council.</p> <p>There is an opportunity for organisations that solely transport people with access or disability needs to apply for an individual circumstance exemption.</p>
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*Any other vehicles required for urgent safety matters with the permission of the Council*

<b>Exempt</b>	Any other vehicles required for urgent safety matters with the permission of the Council
<b>Extent of exemption(s)</b>	Dependent on nature of request. May be single LTN filter, whole LTN or all LTNs in the borough.
<b>Application process</b>	Wherever possible, the Council should be notified in writing in advance of the need for an exemption in this category and have the opportunity to consider and respond to the request. However, it is recognised there may be emergency situations which do not allow for this and, in such cases, requests for an exemption will be dealt with via the PCN enforcement and appeals process.
<b>Evidence requirement for exemption</b>	Dependent on nature of request
<b>Not exempt</b>	N/A

#### *Individual circumstance exemptions*

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 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.

While taxis and other private hire vehicles are important means of transport for some disabled people and other people with access needs, it is not currently feasible or practical for the Council to administer, manage and enforce exemptions where the transport is arranged on an ad hoc basis and the vehicles are subject to regular change and advance notice cannot be provided of the registration details. As such, they are not subject to an exemption as these vehicles would potentially also be making transport journeys at other times with other occupants in the car that do not require an exemption and there is no way to distinguish between journeys. As such, taxis and other private hire vehicles are not included as part of the LTN Haringey Exemptions Criteria and Applications Process. As the roll out of LTNs across the borough progresses, consideration will be given to how such an exemption could be managed in the future

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;
- 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](#). If assistance is required, applications can be completed over the telephone with officers available to provide assistance.

To help ensure the application process is as user-friendly as possible, the application form includes a tick box enabling the applicant to grant the Council permission to cross-check its internal records for evidence purposes (e.g., proof of address). This will limit the need for applicants to supply information where the Council already holds it.

The application form sets out the evidence types which may be required in support of the application.



The application forms focuses on key details of the journeys impacted by the LTN or LTNs, such as the journey origin, the destination, the essentialness of the journeys, the journey duration, the time of day in which the journey must be made and the frequency of the journey.

Where an application is successful, the Council will confirm this in writing to the applicant, including providing details of the scope and extent of the given exemption that has been granted. This will either be linked to the expiry of the Blue Badge (at which point revised Blue Badge details would need to be provided) or time-limited to one year for non-Blue Badge owners.

Where an application is unsuccessful, the Council will confirm this in writing to the applicant, including providing details of why it has been refused.

The applicant has a right of appeal which it may exercise for up to 28 days from the day the applicant received the LTN exemption decision. The appeal must come in the form of a written request and should include an explanation of why the applicant believes the Council should review its decision and any other information they would like considered as part of the review.

Within 56 days of receiving the written appeal, a senior officer will offer a decision with a written explanation of whether they have upheld the Council's original exemption decision, how the review was conducted, how the decision was reached and the factors they considered in reaching that decision.

### **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.

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# Equality Impact Assessment

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## 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 children<sup>1</sup>.

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 UK<sup>2</sup>. 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 pollution<sup>3</sup>.

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

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

<sup>3</sup> 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 Plan<sup>4</sup> which sets out how to make the borough a more attractive place for residents, businesses and visitors, by enabling more walking, wheeling<sup>5</sup>, 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 incomes<sup>6</sup> 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 time<sup>7</sup>, 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.

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

<sup>5</sup> '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.

<sup>6</sup> 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>

<sup>7</sup> <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 making<sup>8</sup>.

## An Iterative Approach

As per Transport for All's manifesto for 'EqIAs in Action'<sup>9</sup>, 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 1<sup>st</sup> 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

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<sup>8</sup> <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)

<sup>9</sup> 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 surveys<sup>10</sup> 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

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<sup>10</sup> Haringey Bounds Green Perception Survey Analysis  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey\\_bounds\\_green\\_commonplace\\_report\\_v2.0.pdf](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' report<sup>11</sup>. This and existing guidance<sup>12</sup> 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 73,000,000<sup>13</sup>. 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

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

<sup>12</sup> '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](https://www.ciht.org.uk/media/4463/ciht_shared_streets_a4_v6_all_combined_1.pdf)

<sup>13</sup> <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 boroughs<sup>14</sup>, 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 cohesion<sup>15</sup>. 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

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<sup>14</sup> 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>

<sup>15</sup> 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.

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## 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 document<sup>16</sup>.

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<sup>16</sup> 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' profile<sup>17</sup> 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 lockdown<sup>17</sup>. 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.

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<sup>17</sup> Haringey at a Glance – State of the Borough  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](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)<sup>18</sup>
- In Haringey, 3.3 times more primary school children walk to school than are driven to school<sup>13</sup>
- 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 Haringey<sup>19</sup>. 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

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

<sup>19</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/air\\_pollution.pdf](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 half<sup>20</sup> 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 road<sup>21</sup>. 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 regularly<sup>16</sup>. 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

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

<sup>21</sup> 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 expected<sup>22</sup>.

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 LTN<sup>23</sup>. 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 impacts<sup>24</sup>. 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 SEN<sup>25</sup> 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.

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<sup>22</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)

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

<sup>24</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/bruce\\_ta\\_0.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/bruce_ta_0.pdf)

<sup>25</sup> 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)..

### 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 over<sup>26</sup>, 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 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

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

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 people<sup>27</sup>. 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 others<sup>28</sup>.

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 roads<sup>29</sup> 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 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

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<sup>27</sup> 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>

<sup>28</sup> 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>

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

offering exemptions for all blue badge holders<sup>30</sup> 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.<sup>31</sup>

## 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).

## 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

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<sup>30</sup> 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.

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

- Bounds Green ward has a larger proportion of residents whose ethnicity is White-Other (30.5%), compared to the wider Haringey population (25.9%)<sup>32</sup>. 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 wards<sup>33</sup>.
- 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 children<sup>34</sup>.
- 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 roads<sup>35</sup>
- 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).
- 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

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<sup>32</sup> Bounds Green Ward Profile

[https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_bounds\\_green.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bounds_green.pdf)

<sup>33</sup> Alexandra Ward Profile [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_alexandra.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_alexandra.pdf)

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

<sup>35</sup> LTN's for All? WeArePossible, Active Travel Academy, KR Foundation

<https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/5fb246b254d7bd32ba4cec90/1605519046389/LTNs+for+all.pdf>

these groups. Black, Asian and ethnically diverse Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads<sup>36</sup>. 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 6<sup>th</sup> highest rate in London and is above the statistical neighbour and London averages. Of those whose main language is not English in 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 glance<sup>37</sup>.

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.

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

<sup>37</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)

## 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 data<sup>38</sup>.

- 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 choices<sup>31</sup>
- 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 harassment<sup>39</sup>
- 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%)<sup>40</sup>. Furthermore, 41% of women who experienced an incident of unwanted sexual behaviour did not report it because

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

<sup>39</sup> 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>

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



they felt it was not serious enough<sup>32</sup>. 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 driver<sup>41</sup>. The experience of female cyclists facing disproportionate harassment and bad driving was proven in research by University of Westminster<sup>42</sup>. 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.

### 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

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

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

Between 2019/20 and 2020/21 there was a 10% increase in transgender hate crime in Haringey<sup>43</sup>. 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 iEqIA 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)

### 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

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<sup>43</sup> Haringey State of the Borough

[https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)

Research indicates that motor traffic pollution is linked to poor pregnancy outcomes leading to children who more susceptible to disease later in life<sup>44</sup> 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 period<sup>45</sup> and there is good evidence that LTN's lead to people being more physically active<sup>46</sup>.

## 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.

## 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%).

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

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

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

- 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%)<sup>47</sup>.
- 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%)<sup>48</sup>.

## 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

### 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 residents<sup>49</sup>.

## 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

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<sup>47</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_bounds\\_green.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bounds_green.pdf)

<sup>48</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_alexandra.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_alexandra.pdf)

<sup>49</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities\\_profile\\_of\\_haringey.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf)

serve to benefit this protected group<sup>50</sup>. 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.

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

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<sup>50</sup> 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>

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 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 circumstances 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;
- 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.

## 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

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## 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	<p>None*</p> <p>*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.</p>	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

# Equality Impact Assessment

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## Bruce Grove West 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<sup>1</sup>. 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 children<sup>1</sup>.

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 UK<sup>2</sup>. 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

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

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

includes those fitted to electrically powered motor vehicles). In 71% of UK towns and cities, children are breathing unsafe levels of air pollution<sup>3</sup>.

Low Traffic Neighbourhoods (LTNs) form a key part of Haringey's draft Walking and Cycling Action Plan<sup>4</sup> which sets out how to make the borough a more attractive place for residents, businesses and visitors, by enabling more walking, wheeling<sup>5</sup>, 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 incomes<sup>6</sup> 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 time<sup>7</sup>, 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

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<sup>3</sup> 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>

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

<sup>5</sup> '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.

<sup>6</sup> 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>

<sup>7</sup> <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>



- 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. Haringey Council intend to adopt socio-economic status as a local protected characteristic to inform future policy making<sup>8</sup>.

## An Iterative Approach

As per Transport for All's manifesto for 'EqIAs in Action'<sup>9</sup>, 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

### Engagement Stage 1 – Early Engagement

- 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)

### Engagement stage 2 – Community design Workshops

- May 2021 – Series of public collaborative design workshops, online (Stage 2 Engagement)
- May 2021 – Key stakeholder design workshop, online

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<sup>8</sup> <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)

<sup>9</sup> 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/>

- June 2021 - Workshop with Disability Action Haringey and Wheels for Wellbeing
- July 2021 - Disabled Persons and Carers Survey running from Monday 10 May to Wednesday 1<sup>st</sup> September 2021.

### Engagement Stage 3 – Public consultation

- August 2021 September – Public consultation (Stage 3 Engagement). All postal addresses written to with details of proposals and survey. This will include translation offer and accessible format options
- 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 surveys<sup>10</sup> were launched providing residents with an opportunity to leave location specific comments about their experiences moving around the project area.

- 2,071 people visited the site and there were 515 confirmed respondents who left comments or 'Agreements'.
- The most common issue raised by respondents was 'Traffic speeding' accounting for 63% of all comments and agreements, followed by 'Traffic Volume' and 'Rat running traffic'.

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<sup>10</sup> Haringey Perception Survey Analysis <https://www.haringey.gov.uk/parking-roads-and-travel/travel/transport-strategy/low-traffic-neighbourhoods-haringey#Stage%201>

- The most common suggested improvement from respondents was “Reduce Traffic Volumes” accounting for 48% of all comments and agreements, followed by “Reduce traffic speeds” and “Increase traffic and speeding enforcement”.
- The principal comment hotspot was along Belmont/Langham Road, followed by other highly commented areas such as The Ave/Sperling Road junction and Higham Road.

### Public Consultation Results

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 1,221 people responded to the consultation – 1,121 via the online portal and 100 via paper surveys
- The majority of responses were from residents in the Bounds Green area. Most respondents not in the Bruce Grove West Green LTN area visit friends, family, or businesses in the area.
- 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, 45-54 and 25-34. The number of people who said they had a disability and/or a long term illness is roughly in line with national averages.
- Respondents were asked how they felt about LB Haringey proposing to reduced motor vehicle traffic in the Bruce Grove West Green LTN: 36% selected “1 – Negative”, and 6% selected “2”. 4% selected “3”. 5% selected “4” and 47% selected “5 – Positive”.
- Respondents were also asked about the changes being proposed in the two consultation areas. There were similar patterns of responses to these, with between 44%-46% selecting “1-Negative” and between 38%-41% selecting “5-Positive”. Those selecting “2”, “3”, “4”, or “I don’t know” were each 6% or under respectively.
- There was high levels of positivity for the proposed crossings 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
  - The impact of increased traffic on road safety
  - Other less common reasons people gave included concerns around access to houses and/or local amenities, personal security on quieter roads, and accessibility of emergency services
- 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.
  - Generally older people, and 16-24 year olds, were less positive about the proposed changes than 25-44 year olds.
  - Women were less positive about the proposed changes than men.

The Bruce Grove West 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. 61 responses were received from those in the Bruce Grove/West Green area. Of the 61 respondents, 46 left comments.

Of those who responded

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

The most common locations that people required access to included:

- Doctors, pharmacy and other medical services (6 comments)
- School/education (6 comments)

- To give care to relatives (6 comments)
- Public transport (1 comment)

The key issues raised about the LTN included:

- Concerns about longer journey times (13 comments)
- Often linked to an increase in journey times were concerns around the impact of LTNs on main roads (12 comments)
- Many comments also said that the LTN would block access to key places, such as homes or services (6 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 (10 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 (3 comments)
- Other key issues raised included concerns about air pollution (4 comments) and general disagreement with the scheme (5 comments)

While many of the issues raised were similar to the main survey, 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:

- 5 of these comments left general support
- There were also 2 comments that said that the LTNs would improve their mobility, opening up routes for them to walk, cycle or use a wheelchair (2 comments)

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

- The most common of these was around improving the consultation (20 comments). These comments related to: ensuring that disabled voices are listened to; improving communications (many had not heard much about the consultation), 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 providing disabled/carers exemption (4 comments), scrap the scheme altogether (3 comments), and expand the schemes (1 comment).

## 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' report<sup>11</sup>. This and existing guidance<sup>12</sup> 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 73,000,000<sup>13</sup>. With 57% of Haringey households having no access to a private car or van at last census<sup>14</sup>, 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 physical inactivity, community severance, air pollution, social isolation and a collapse in childhood freedom<sup>15</sup>. 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<sup>16</sup>.

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

<sup>12</sup> '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](https://www.ciht.org.uk/media/4463/ciht_shared_streets_a4_v6_all_combined_1.pdf)

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

<sup>14</sup> Census 2011 <https://www.nomisweb.co.uk/census/2011>

<sup>15</sup> Working Together to Promote Active Travel

[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](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)

<sup>16</sup> DfT Road Traffic Estimates 2019

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/916749/road-traffic-estimates-in-great-britain-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/916749/road-traffic-estimates-in-great-britain-2019.pdf)

## 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 boroughs<sup>17</sup>, with fresh data showing overall motor traffic reductions, increased walking rates and reductions in crime. 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 cohesion<sup>18</sup>. 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 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. This also applies to bus services using the minor road network, as such as the W4 service. 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

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<sup>17</sup> 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>

<sup>18</sup> 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>

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 side of a filter point however, the filter will prevent motor 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.

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## 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 document<sup>19</sup>. 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' profile<sup>20</sup> 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 lockdown<sup>17</sup>. 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

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<sup>19</sup> Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>20</sup> Haringey at a Glance – State of the Borough  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)



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

Bruce Grove ward’s overall population spread mirrors that seen in Haringey more widely, with those aged 20-44 making up the largest proportion of residents (41.2%), and those aged 65+ making up the smallest proportion (9.1%). However, while following the wider borough pattern, the 65+ population is particularly under-represented in Bruce Grove<sup>21</sup>. West Green ward’s overall population spread again mirrors that seen in Haringey more widely, with no age group particularly over-represented or under-represented in the ward<sup>22</sup>.

### What we know about young people

- There are 56,718 children in Haringey aged 0-17 years, representing 21% of the population.
- More 11-17 year olds walk to school in Haringey than in any other London borough (64% mode share)<sup>23</sup>
- In Haringey, 3.3 times more primary school children walk to school than are driven to school<sup>13</sup>
- 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 Haringey<sup>24</sup>. 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 in Bruce Grove West Green project area

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<sup>21</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_bruce\\_grove.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bruce_grove.pdf)

<sup>22</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_west\\_green.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_west_green.pdf)

<sup>23</sup> TfL Streetspace Guidance, Appendix 7 – Case-making Data for Boroughs <https://tfl.gov.uk/info-for/boroughs-and-communities/streetspace-funding>

<sup>24</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/air\\_pollution.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/air_pollution.pdf)

- Bruce Grove Primary School
- Belmont Infant and Junior Schools
- Park View School
- The Grove School (SEND provision)
- The Brook and The Willow on The Broadwaters
- Harris Primary Academy, Philip Lane

Schools within walking distance of project boundary:

- Risley Avenue Primary School
- Hyland House Primary School
- Seven Sisters Primary School
- Noel Park Primary School
- West Green Primary School
- Harris Academy, Tottenham

### Assessment

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 half<sup>25</sup> 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 road<sup>26</sup>. 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

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<sup>25</sup> <https://findingspress.org/article/25633-impacts-of-2020-low-traffic-neighbourhoods-in-london-on-road-traffic-injuries>

<sup>26</sup> 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>

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 regularly<sup>16</sup>. 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. Bruce Grove and West Green both sit within the top 25% of most deprived wards in London<sup>27</sup>. Research in boroughs who have introduced wide-spread measures to enable active travel including LTNs shows that significant increases in air quality can be expected<sup>28</sup>.

School Streets - Haringey Council are planning School Streets projects in the area whereby motor vehicle movements are restricted around the 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 LTN<sup>29</sup>. 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

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<sup>27</sup> MHCLG Indices of Deprivation 2019, London Wards Summary Measures - <https://data.london.gov.uk/dataset/indices-of-deprivation>

<sup>28</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)

<sup>29</sup> <https://enjoywalthamforest.co.uk/work-in-your-area/walthamstow-village/comparison-of-vehicle-numbers-before-and-after-the-scheme-and-during-the-trial/>

impacts<sup>30</sup>. The impact on the project 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. 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. The Council will also be offering an exemption to SEN<sup>31</sup> 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 have notified us that they are in principle, supportive of the LTN and its objectives.
- After engagement with the Grove School, the school street proposed here will not be implemented. The school have informed us that as a school for children with special educational needs that parents need access to the school gate at pick up and drop off times. We have also revised the design of Bruce Grove West Green Area B to allow parents to access the Grove School from Belmont Road
- After engagement with the Belmont Junior School, we are proposing to modify the school street proposed here. A smaller area of Rusper Road will be subject to school street restrictions than initially proposed.
- After engagement with Belmont infant School, a redesign of Bruce Grove West Green Area B has proposed a new Physical Filter on Hawke Park Road between boundary and Sirdar Road. This will provide a new walking route to the school
- 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).

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<sup>30</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/bruce\\_ta\\_0.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/bruce_ta_0.pdf)

<sup>31</sup> 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

## 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 over<sup>32</sup>, 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 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 the Council's 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

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<sup>32</sup> Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

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<sup>33</sup>. For Bruce Grove ward, it is slightly higher, at 15.1%, and for West Green ward, the figure is higher still, at 16.2%, This is higher than both the Haringey and London average. Similarly, 5.7% of Haringey residents report being in bad health, slightly higher than England and London.

## 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.

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<sup>33</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities\\_profile\\_of\\_haringey.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf)

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 people<sup>34</sup>. 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

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<sup>34</sup> 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>

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 others<sup>35</sup>.

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 roads<sup>36</sup> 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 they have been key in bringing in other stakeholders to feed into project development. We recently completed a 'roll-around' audit of the area with mobility aid users who provided feedback around footway hazards, personal security and general accessibility around minor roads. Two new controlled crossings will be introduced as part of the Bruce Grove West Green LTN, on Bruce Grove and Belmont Road.

During the LTN trial the Council will continue to engage with 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 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 holders<sup>37</sup> 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<sup>38</sup>.

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<sup>35</sup> 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>

<sup>36</sup> LTN's for All? WeArePossible, Active Travel Academy, KR Foundation  
<https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/5fb246b254d7bd32ba4cec90/1605519046389/LTNs+for+all.pdf>

<sup>37</sup> 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.

<sup>38</sup> <https://www.haringey.gov.uk/parking-roads-and-travel/travel/smarter-travel/school-streets>



#### Update November 2021

- 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
- Pembury Road filter to change from physical to emergency access filter because of a specific request from the emergency services. This will allow access to residents in need, including those with disabilities.
- 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).

### 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

- Bruce Grove has a significantly higher proportion of residents whose ethnicity is Black (31.9%), compared to the wider Haringey population (18.8%). This is the major ethnic group in Bruce Grove<sup>39</sup>, whereas West Green largely follows the ethnicity pattern seen in Haringey more widely, with the exception that the White British ethnic group is the third largest ethnic group (while it is usually the largest). 21.7% of West Green residents are of White British ethnicity, compared to 34.7% in Haringey<sup>40</sup>.
- Walking is the most 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.)

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<sup>39</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_bruce\\_grove.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bruce_grove.pdf)

<sup>40</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_west\\_green.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_west_green.pdf)

- 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 children<sup>41</sup>.
- Analysis in 2020 shows that in Outer London 92.5% of white Londoners live on minor roads compared to 90.6% of black Londoners. Data also shows 88.7 of Asian Londoners and 88.2 of diverse ethnic groups live on minor roads<sup>42</sup>
- 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).
- Driving a car is higher among Asian Londoners compared with other 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 non-white 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 non-white 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 non-white Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads<sup>43</sup>. 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.

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<sup>41</sup> Vision Zero Action Plan – Taking forward the Mayor's Transport Strategy <https://content.tfl.gov.uk/vision-zero-action-plan.pdf>

<sup>42</sup> LTN's for All? WeArePossible, Active Travel Academy, KR Foundation <https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/5fb246b254d7bd32ba4cec90/1605519046389/LTNs+for+all.pdf>

<sup>43</sup> TfL Casualties in Greater London during 2014 <http://content.tfl.gov.uk/casualties-in-greater-london-2014.pdf>

## 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 6<sup>th</sup> highest rate in London and is above the statistical neighbour and London averages. Of those whose main language is not English in 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 glance<sup>44</sup>.

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

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 November 2021

- Broadwater Farm Estate has been identified as an area where a high proportion of BAME residents live in Bruce Grove West Green. During the consultation period additional 'pop up' engagement events were carried out on the estate, while posters and leaflets were translated into Kurdish and Somali. Haringey council are proposing to carry out additional engagement in several languages on the estate before any trial LTN is implemented.

## 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 appear to influence the travel behaviour and attitudes of

<sup>44</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)

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 data<sup>45</sup>.

- 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 choices<sup>31</sup>
- 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 harassment<sup>46</sup>
- 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%)<sup>47</sup>. Furthermore, 41% of women who experienced an incident of unwanted sexual behaviour did not report it because they felt it was not serious enough<sup>32</sup>. 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 driver<sup>48</sup>. The experience of female cyclists facing

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<sup>45</sup> Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>46</sup> 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>

<sup>47</sup> Travel in London: Understanding our Diverse Communities <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>48</sup> What are the barriers that particularly affect women? <https://www.cyclinguk.org/article/campaigns-guide/women-cycling>

disproportionate harassment and bad driving was proven in research by University of Westminster<sup>49</sup>. 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.

## 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.

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

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<sup>49</sup> The Near Miss Project <http://rachelaldred.org/wp-content/uploads/2019/03/Nearmissreport-final-web.pdf>

Between 2019/20 and 2020/21 there was a 10% increase in transgender hate crime in Haringey<sup>50</sup>. 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 EqlA 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)

- 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

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<sup>50</sup> Haringey State of the Borough

[https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)

Research indicates that motor traffic pollution is linked to poor pregnancy outcomes leading to children who more susceptible to disease later in life<sup>51</sup> 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 period<sup>52</sup> and there is good evidence that LTNs lead to people being more physically active<sup>53</sup>.

### 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.

### 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%).

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<sup>51</sup> Traffic pollution is linked to poor pregnancy outcomes <https://www.bmj.com/content/359/bmj.j5511>

<sup>52</sup> Physical Activity and the Occurrence of Postnatal Depression  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6780177/>

<sup>53</sup> Low Traffic Neighbourhoods: what is the evidence from the mini-Holland interventions?  
<https://osf.io/preprints/socarxiv/ebj89/>

- Compared to the rest of Haringey, Bruce Grove has a larger than average Christian population (51.6%), and among the smallest proportion of Jewish residents in Haringey (0.4%).<sup>54</sup>
- While following the overall borough pattern, West Green has a larger proportion of Muslim residents (21.2%) compared to Haringey (14.2%).<sup>55</sup>

### 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

- 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 residents<sup>56</sup>.

### 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 group<sup>57</sup>. It should also be noted that this is an iterative assessment document and should specific issues come to light around people with protected

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<sup>54</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_bruce\\_grove.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bruce_grove.pdf)

<sup>55</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/ward\\_profile\\_west\\_green.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_west_green.pdf)

<sup>56</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities\\_profile\\_of\\_haringey.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf)

<sup>57</sup> 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>



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.

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 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 circumstances 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;
- 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.

## 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

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- 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>
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## 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/attachment\\_data/file/695781/Reducing\\_unintentional\\_injuries\\_on\\_the\\_roads\\_among\\_children\\_and\\_young\\_people\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695781/Reducing_unintentional_injuries_on_the_roads_among_children_and_young_people_.pdf)

## Appendix 1 – Summary of changes to designs after public consultation

Area of LTN	Key post-consultation changes	Reason for change
Bruce Grove West Green LTN (All areas)	Application process to be introduced for Blue Badge Holders living in the LTN area or on boundary roads 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.
Bruce Grove West Green LTN Area A	Pembury Road filter to change from physical to emergency access filter	In response to emergency service request
	Sperling Road school street reduced to just Sperling Road (remove section on Moorefield Road, Avenue Road, Woodside Gardens and section of St Loy's Road)	To simplify arrangement and facilitate satisfactory access to industrial estate on Moorfield Road
	Sperling Road emergency filter moved to eastern end by Moorfield Road, and school street closure moved to junction with Woodside Gardens. The emergency filter will be changed to a school street filter 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.	To provide space for turning around away from school entrance.
	Adams Road School Street removed and a school safety scheme to be implemented instead	To better provide the needs of the school and align with the redevelopment of the Broad Water Farm Estate

Bruce Grove West Green LTN Area B	School Street at Grove School Removed	To respond to the specific needs of the children who attend the school most of whom need to be dropped off right outside the school entrance. This follows discussion with the school.
	School Street on Rusper Road shortened to just section of Rusper Road up to the junction with Sandringham	To respond to feedback from the school and residents whose preference was to have access via Downhills Way/Belmont Road.
	Central filters reconfigured to allow school access from Belmont Road	Same as above and to ensure there was no route available between Westbury Avenue and Belmont Road.
	Physical Filter on Hawke Park Road between boundary and Sirdar Road introduced	To provide walking route from Westbury Avenue to the Recreation ground where Belmont Infant pedestrian access is through.

## Appendix 2

### Stakeholder groups contacted

Disability Action Haringey	Young Onset Dementia Support Group (YoYo)
Network for LGBT+ planning professionals	Haringey Over Fifties
Mobility and Seating Solution Centre (MSSC)	
Wheels for Wellbeing	Lordship Hub Co-op
Transport for All	Avril's Walks and Talks
The Alzheimer's Society Enfield	BUBIC (Bringing Unity Back Into the Community)
SGV Cancer Support	Women in Tottenham
Venture Club for the Blind and Partially Sighted	Haringey LGBT Forum
Haringey Phoenix Group (services for visually impaired people)	Gingerbread Haringey
RNIB	Haringey Families
Guide Dogs	Miller Memorial Methodist Church
JDA - deaf and hard of hearing	Edmansons Close Chapel
Mind Haringey	St Philip the Apostle, Tottenham
Haringey Learning Disabilities Centre	Grace Baptist Chapel
Haringey Autism	Christ Apostolic Church Outreach DDC HQ
HAIL's autism club	Igreja Evangelica Avivamento Da Fe
Markfield Together for Inclusion	Potters House Christian Fellowship
	Assunah Islamic Centre



Age UK Haringey & Enfield

DRS Care Homes

Trinity Heart Care homes

Edmanson's Close retirement housing

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## EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2, and complete a full Equality Impact Assessment (EqIA).

### Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

**When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.**

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
<b>Name of proposal</b>	St Ann's Low Traffic Neighbourhood
<b>Service area</b>	Housing, Regeneration and Planning
<b>Officer completing assessment</b>	Ying Wu (external support)
<b>Equalities/ HR Advisor</b>	Norman Rourke Pryme (external support)
<b>Cabinet meeting date (if applicable)</b>	December 2021
<b>Director/Assistant Director</b>	Rob Krzyszowski

## 2. Summary of the proposal

*Please outline in no more than 3 paragraphs*

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

### **Proposal:**

A Low Traffic Neighbourhood (LTN) scheme is proposed for the St Ann's area, in the London Borough of Haringey. A Low Traffic Neighbourhood is an area which has a number of places where motor vehicles are not allowed to pass through. This reduces or eliminates through traffic in the area. Removing through traffic is likely to reduce traffic volumes significantly within the LTN creating safer, cleaner and more pleasant streets for people to walk, wheel, cycle, gather and play in a healthier environment. Access to all addresses for motor vehicles will be maintained, but some residents and visitors may have to drive further or use a different road to their habitual route to access their address.

Areas of St Ann's suffer from high levels of through traffic (rat running). This rat running negatively affects the area, where most households do not own or have access to a motor car.<sup>1</sup> Implementing the LTN will remove the vast majority of this through traffic on the residential roads.

Through motor traffic will be restricted at key points on certain streets using modal filters to prevent or to discourage vehicles driving through the neighbourhood, which would reduce rat running and air pollution. Modal filters are points in the road that prevent motor vehicles from passing through, but allow walking, cycling and wheeling. Modal filters proposed during will either be physical, or the road will be left open for emergency access and may be enforced by cameras. As we are proposing a trial scheme, hard closure filters will consist of planters and/or bollards placed in the road. The modal filters proposed will be placed wide enough to also allow a through route for emergency services, apart from one location (Clinton Road) where all motor vehicles will be prevented from passing through, but walking, cycle and wheeling will be permitted.

During the consultation phase two options were proposed for the St Ann's area.. The 2 options, A and B, can be viewed online at <https://www.haringey.gov.uk/parking-roads-and-travel/travel/transport-strategy/low-traffic-neighbourhoods-haringey>. For both options, all but one of the modal filters allowed for emergency vehicles. In addition, in Option A, a bus gate, which is a type of modal filter where buses can also pass through, was proposed at a single location (Black Boy Lane) to allow buses to drive through the modal filter. Option A eliminated all through traffic from the entire LTN area, while Option B eliminated only east-west through traffic and some north-south through traffic to the west of the LTN area.

As part of the public consultation a survey was available online and paper copies were also issued. The survey asked for feedback on an LTN in general and on people's views on Option A and B. 63% of respondents gave positive responses to the proposal to reduce vehicle traffic in the St Ann's ward. A significantly higher proportion of respondents provided positive sentiments towards Option A over B.

<sup>1</sup> [census11\\_st\\_ann\\_s\\_ward\\_profile.pdf \(haringey.gov.uk\)](https://www.haringey.gov.uk/census11_st_ann_s_ward_profile.pdf)

LTNs reduced traffic injury risk by 70% on roads within the LTNs for pedestrians, cyclists, and car occupants alike according to [London's Low Traffic Neighbourhoods: an emerging evidence base, 2021<sup>2</sup>](#). Studies have shown that there are additional social benefits associated with LTNs. It was noted in [The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London, 2021<sup>3</sup>](#) the introduction of a LTN in Waltham Forest was associated with a 10% decrease in total street crime and this effect increased after a longer period (18% decrease after 3 years). An even larger reduction was observed for violence and sexual offences, the most serious subcategory of crime. The potential causative factors that result in reduced crime are not identified in the report, yet the outcome demonstrates a potential benefit.

This Equality Impact Assessment report is a live document that will continue to be developed throughout the ongoing consultation, implementation and monitoring phases to ensure all groups are considered at all stages of the LTN design and delivery.

#### **Stakeholders affected:**

Everyone living in or who travels through the St Ann's LTN area and surrounding areas would be affected by the proposal. Vehicle access to all properties within the area will be maintained under the LTN, albeit the schemes will result in changes to motor vehicle access routes for some drivers. The LTN will deliver multiple benefits, of varying degrees, for various non-motorised users, as described throughout the Equality Impact Assessment (EqIA) report.

#### **LTN Decision-making Route:**

The council has carried out community engagement exercises which are explained on the council's LTN webpage. The feedback received from the public and local stakeholders have helped develop the St Ann's LTN proposal. The engagement provided a range of channels (online and offline) to provide feedback. A comprehensive stakeholder mapping exercise has been undertaken to ensure groups representing those with protected characteristics are able to engage.

This included an interactive online engagement map and survey conducted from 4 February to 7 March 2021 which gathered views from the community on the existing issues within the St Ann's LTN area and an opportunity to suggest improvements. There was also an opportunity to email feedback to the project team and to leave a message on a dedicated answer phone. An online public meeting was also held on 2 March 2021 to engage people and hear their views on introducing an LTN project across the St Ann's area. An FAQ document was developed based on the public meeting to give the community a greater understanding of an LTN-type scheme and the associated benefits. Further engagements including a Disability Workshop (19 May 2021), 2 x Public Workshops (24 & 24 May 2021) and a Stakeholder Early Engagement Workshop (15 June 2021) have also been held online.

Community stakeholder groups, including those for service users with protected characteristics under the Equality Act 2010, were identified and invited to participate in the workshops and additional online meetings; these included parents and teachers of schools

<sup>2</sup>[https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/60003fabf3791928a02b707f/1610629036655/LTN+Briefing\\_FINAL.pdf](https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/60003fabf3791928a02b707f/1610629036655/LTN+Briefing_FINAL.pdf)

<sup>3</sup><https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london>

in the LTN areas, disability and access groups, the emergency services and our strategic transport partners, Transport for London, neighbouring councils and GTR railway.

A further online survey had taken place from 10 May 2021 to 6 August 2021 which focused specifically on disabled people and carers, with paper copies also sent to the Blue Badge holders and various representative groups in the area.

Unfortunately, due to COVID-19 restrictions and precautions, face-to-face engagement activities have been limited. However, the following were provided to enable engagement with those not able to participate in the on-line activities:

- Newsletter/mailldrop for local residents and businesses
- Letters/emails to stakeholders

The following additional tools were also provided to residents during the public consultation on the design options, with multiple opportunities to provide feedback on the evolving proposals for the St Ann's LTN project:

- The option to request consultation materials in different languages or in braille;
- Individuals were able to request a telephone call to discuss the proposals and printed copies of the materials presented.
- Sub-titling for online events if requested by anyone who is hard of hearing will continue;
- A postal address was provided so individuals could still provide feedback if not able to submit these online;
- Any locations where physical consultation materials were available were in accessible locations; and
- Translation and sign language options were offered on request.

The feedback was used to develop two St Ann's LTN options, referred to as Option A and B. Please refer to the maps here: <https://www.haringey.gov.uk/parking-roads-and-travel/travel/transport-strategy/low-traffic-neighbourhoods-haringey>.

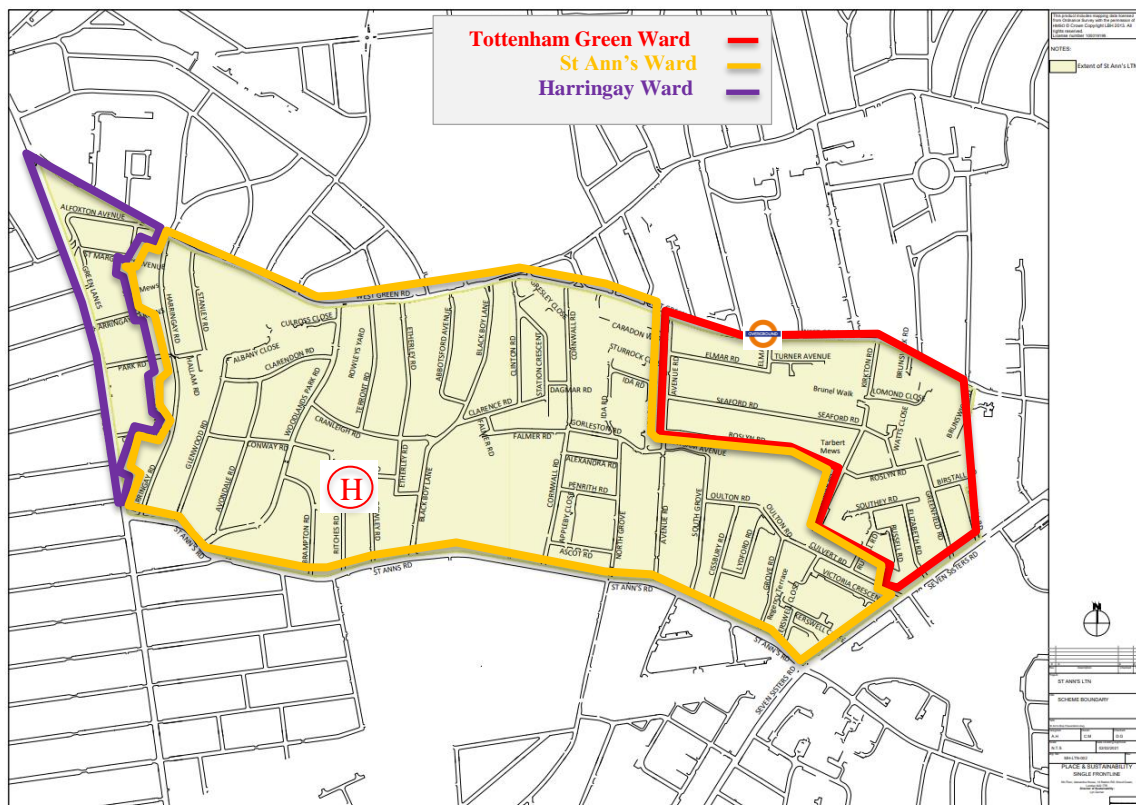
As part of the engagement, a consultation phase was held between 23 August to 17 September 2021, to enable residents, businesses, stakeholders and those travelling through the proposed LTN area, and affected adjacent areas to comment on both schemes. Consultation materials including a leaflet summarising the proposed options and a questionnaire was posted to all households and premises in the LTN and on adjacent roads.

All feedback was considered and analysed to inform the recommendations to Cabinet. The majority of respondents were in support of reducing traffic in St Ann's ward and Option A was supported over Option B. A full analysis can be found in the Consultation report accompanying the Cabinet paper. Having regard to all relevant factors, Option A is proposed for implementation.

It is expected some traffic will divert to the main roads surrounding the LTN under Option A and possibly beyond as they seek alternative routes. This is likely to lead to an increase in traffic on the main roads, at least until things settle down. A high level traffic assessment has been carried out and is available on the project website, which has addressed the potential traffic impact issues, which may result in some increased journey times in the short term.

During the LTN trial period, traffic volumes, traffic speeds, air quality, road collisions, and other data will be monitored while the scheme is in place, and there will be opportunity to adjust the scheme if necessary. An online perception survey will also be used to gain feedback from the public on the impacts of the scheme once implemented. During the trial period, the community will be able to provide further feedback. Traffic volumes and air quality will also be monitored in the LTN area and boundary roads. This information, along with any other community feedback received, will be taken into consideration in making a decision as to whether or not to make the traffic management changes are made permanent at the end of the trial period. The community will then be notified of the decision.

#### Project area:



The map can also be accessed in a larger format on our website:  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/st\\_anns\\_ltn\\_map.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/st_anns_ltn_map.pdf)



### 3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A
Gender Reassignment	<i>Not Available</i>	N/A
Age	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A
Disability	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A
Race & Ethnicity	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A
Sexual Orientation	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A
Religion or Belief (or No Belief)	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A
Pregnancy & Maternity	<i>Not Available</i>	N/A
Marriage and Civil Partnership	<i>Haringey Equalities Profile</i> <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> <i>Ward level Equalities data 2011 Census</i>	N/A



**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

*Further information on how to do data analysis can be found in the guidance.*

St Ann's LTN project covers not only St Ann's ward, but also sections of Harringay and Tottenham Green wards. For that reason, information from the Census 2011 has been gathered on each protected group for each of these wards and for Haringey borough as a whole.

### **Sex:**

It is important that any scheme ensures that the needs of both genders are taken into account, and any victimisation of women is not only avoided, but if possible reduced by the design. In order to achieve this, it will be important to meaningfully involve women in the design.

Gender	St. Ann's ward (%)	Harringay ward (%)	Tottenham Green ward (%)	LB Haringey (%)	of London (%)
Male	51.5%	51.4%	49.2%	49.5%	49.3%
Female	48.5%	48.6%	50.8%	50.5%	50.7%

St Ann's ward has 51.5% of men and a slightly lower proportion of women at 48.5%.

For Harringay ward there is 51.4% of male and a 50.5% of women.

Tottenham Green's overall population consists of 49.2% of men and 50.8% of women.

LB Haringey has 49.5% of men and 50.5% of women. Haringey's men to women ratio is in line with the rest of London.

Across Greater London, research undertaken by TfL shows walking is the most commonly used type of transport by women (95 per cent walk at least once a week). Women are also more likely to use buses than men (63% compared with 56%) but are less likely to use other types of transport including the Tube (38% of women compared with 43% of men). Men (42%) are likely to drive a car than women (33%) once a week, with women (51%) more likely to use a car as a passenger once a week compared to men (37%).

Female Londoners take more trips on a weekday than male Londoners, 2.5 compared to 2.3<sup>4</sup>. This pattern however is reversed amongst older adults, with older women Londoners taking fewer weekday trips than older men Londoners, 2.0 compared to 2.2. It is important to recognise that women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.

Women aged 17 or over who are living in London are less likely than men to have a full driving licence (58% compared with 72%) or have access to a car (63% of all women

<sup>4</sup> <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

compared with 66% of all males). These factors are likely to be related to the frequency of car use as a driver.

Women are more likely to use the bus than men. As many public transport journeys start or end on foot or cycle, the improvements the scheme aims to deliver in terms of safety and convenience to these networks will improve their access to public transport services.

79% of women in London report being able to ride a bike, compared with 91% of males<sup>5</sup>. Increasing residents' access to favourable cycling conditions is likely to benefit women, particularly due to higher number of trips they make on a daily basis compared to men, as well as their role in taking children to and from educational and recreational facilities. The proposals would reduce a significant barrier to cycling.

Reduced volumes of motor vehicle traffic in LTNs create significantly quieter environments which can heighten the apprehension of threat. This perception particularly impacts women making trips by foot or bicycle, as part of a public transport journey or a trip on its own. There is some concern that this perceived risk impacts women's willingness to make trips by active travel modes after dark, although during the day LTNs may create more pedestrians on the street and increase the feeling of safety. In contrast, an academic report<sup>6</sup> suggested a positive improvement in the measured crime rate after the introduction of LTNs. The report examined the impact on street crime after introducing LTNs in Waltham Forest which was associated with a 10% decrease in total street crime, with significant decreases in violence and sexual offences. The potential causative factors that result in reduced crime are not identified in the report, yet the outcome demonstrates a potential benefit. However, women tend to share taxi services late at night to get home safely. The LTN may increase travel times and cost between drop-offs.

Reduction of through-traffic will reduce the risk of road traffic collisions, which would benefit pedestrians particularly pregnant women with infants and/or young children. This will also provide benefits to women travelling with prams who require additional time to navigate kerbs when crossing the street. Quieter streets also mean that those travelling with prams are able to use the road if they choose to circumvent obstructions on the pavement (e.g. if the pavement is too narrow to navigate due to bins).

Haringey Women's Forum was invited to participate in Engagement Stages 2 and 3.

### **Gender Reassignment:**

Census data is not available for Gender Reassignment. As far as we are aware there is no clear evidence or data to expect that the LTN proposals will have a negative impact on Gender Reassignment group. In general, with the lower risk of anti-social behaviour this could be seen as a benefit to this group.

LGBTQ organisations and network have been invited to the engagement events and contacted to find inclusive ways to engage, to ensure they are safe and feel welcomed and comfortable in any engagement sessions. They have been notified of the early public consultation and will be encouraged to take part during all the consultation phases.

<sup>5</sup> <http://content.tfl.gov.uk/attitudes-to-cycling-2014-report.pdf>

<sup>6</sup> <https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london/>

### Sexual Orientation

Census data does not provide information on sexual orientation, however 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey<sup>7</sup>). If the same ratio was assumed, in St Ann's ward this would equate to 468 residents, Harringay ward 424 residents and Tottenham Green ward 466 residents. For Haringey as a borough this would equate to 6,491 residents.

LGBTQ organisations and network have been invited to the engagement events and contacted to find inclusive ways to engage, to ensure they are safe and feel welcomed and comfortable in any engagement sessions. They were also contacted and encouraged to take part during the early consultation.

### Age:

It is essential to ensure the input of children, young people, and the elderly to ensure the designs are accessible, safe, and suitable for them.

There are community groups and organisations targeted at specific age groups that have been contacted and invited to participate in the engagement. These include a number of schools in the area which have been directly approached to help engage them in the process. Care homes and groups representing the elderly were invited to participate in engagement. Phone call engagements have been offered to all residents unable to provide feedback online during the consultation. All residents are also able to post their feedback.

Feedback received throughout the engagement to date has been monitored to ensure the views of these groups have been considered.

Age	St. Ann's ward (%)	Harringay ward (%)	Tottenham Green ward (%)	LB of Haringey (%)	London (%)
0-4	6.9	6.4	7.4	7.1	6.2
5-9	5.4	4.1	5.9	6.2	5.6
10-14	4.9	3.6	6.0	6.0	5.8
15-19	5.0	3.7	6.1	5.6	6.3
20-24	9.4	10.3	8.3	7.4	6.8
25-29	12.7	16.1	11.1	11.0	6.8
30-34	13.2	14.8	10.5	11.2	6.6
35-39	9.4	9.3	8.5	8.9	6.7
40-44	7.2	7.7	8.7	7.9	7.3
45-49	6.2	6.0	6.9	6.9	7.3
50-54	4.5	4.2	5.0	5.3	6.4
55-59	3.7	3.4	4.1	4.2	5.7
60-64	3.0	2.9	3.3	3.6	6.0
65-69	2.4	2.0	2.5	2.6	4.8
70-74	2.4	2.1	2.4	2.3	3.9
75-79	1.8	1.7	1.7	1.8	3.2
80-84	1.0	1.2	0.9	1.1	2.4
85-89	0.6	0.4	0.4	0.6	1.5
90+	0.3	0.1	0.3	0.3	0.8

St Ann's wards' overall population spread closely mirrors that seen in Haringey borough more widely, with those aged 20-44 making up the largest proportion of residents (51.9%), and those aged 65+ making up the smallest proportion (8.5%). Those aged 0-19 make up

<sup>7</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities\\_profile\\_of\\_haringey.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf)

22.2% of the population.

Haringay ward's overall population spread is narrower than that seen in Haringey with those aged 20-44 making up the largest proportion of residents (58.2%, the largest proportion in the borough), and those aged 0-19 making up the smallest proportion (17.8%, the smallest in the borough). In Haringay ward the 20-44 age group is much more prominent than the wider borough average. By contrast, the ward has among the smallest proportions of 0-19 years' olds, 45-59 years' olds, and 65+ years' olds of all Haringey wards.

Tottenham Green ward's overall population spread is in line with that seen in Haringey more widely, with those aged 20-44 making up the largest proportion of residents (47.1%), and those aged 65+ making up the smallest proportion (8.2%). People aged 0-19 mark the 25.4% of the ward's population. No age group is particularly over- or under-represented in the ward, comparative to the borough average.

Haringey Borough compared to London:

Haringey has a higher proportion of 20-44 year olds than London (46.4% and 34.2% respectively). LB Haringey has a lower proportion of pensioners (65+) than London (8.7% and 16.6% respectively). Haringey has a similar proportion of 0-19 years olds as London (24.9% and 23.9% respectively).

Elderly people with early dementia or Alzheimer's can lose their ability to recognize familiar places easily. They may become lost or confused if their local environment is significantly changed in order to establish a LTN. However, any modal filters would be placed on the road and not on the pavement, to avoid obstruction. The LTN would also provide a much safer place with less traffic, which will reduce risk to any people that are likely to wander (with a low degree of awareness) as a consequence of their condition.

Elderly people are also likely to have increased GP and hospital appointments and more likely to have mobility issues. Motor vehicle journey times and routes may be altered due to the proposed schemes. During the early consultation phase, the public and Blue Badge holders had been asked if they have specific needs that require access through the modal filters such that their motor vehicle journey would not be affected. Quite a few disabled people and their carers were concerned about increase travel times in particular those who relied on taxis.

People of young and old age are more vulnerable to poor air quality, as shown in the [Air Quality in City of London: A Guide for Public Health Professionals](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf)<sup>8</sup> study. The scheme proposals would reduce the volume of motor traffic, associated air pollutants and vehicle speeds, with an anticipated improvement in air quality and road safety within the LTN area. This would contribute towards an increased self-reported well-being and quality of life for the older and younger generation.

The Travel in London Report 12<sup>9</sup> states that out of the child (under 16 years) casualties in 2018, 51% were walking compared to 28% were car occupants. Traffic calming measures provided by the LTN will provide a protective factor and redress a disproportionate risk for children walking or playing on the streets.

<sup>8</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_city\\_of\\_london.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf)

<sup>9</sup> <http://content.tfl.gov.uk/travel-in-london-report-12.pdf>.

**Disability:**

There are several groups and organisations providing support and information around living with disabilities which have been contacted and invited to participate in the Council's engagements. They will also be contacted and encouraged to continue engagement with the Council during the LTN trial and beyond.

It is key to involve these groups to ensure the scheme is accessible for people with different disabilities. During the early engagement process a Disability Workshop was held on the 19 May 2021 and an online survey for those who are disabled or are carers took place from 10 May 2021 to 1 September. Paper copies were sent to Blue Badge holders and representative groups in the area. Where consultation material was available in the public areas, these spaces were wheelchair accessible. Haringey offered sign language for people who are deaf or have a hearing impairment, and also subtitling of on-line sessions upon request.

Day-to-day activities	St. Ann's ward (%)	Haringay ward (%)	Tottenham Green ward (%)	LB of Haringey (%)	London (%)
Limited a lot	7.8	5.9	8.4	6.8	6.7
Limited a little	7.6	6.6	8.0	7.2	7.4
Not limited	84.6	87.5	83.6	86.0	85.8
Limited a lot: Age 16 to 64	4.4	3.2	5.2	3.8	3.4
Limited a little: Age 16 to 64	5.0	4.3	5.6	4.6	4.2
Not limited: Age 16 to 64	63.9	70.2	60.6	62.4	61.5

Reported Health	St. Ann's ward (%)	Haringay ward (%)	Tottenham Green ward (%)	LB of Haringey (%)	London (%)
Very good health	45.9	50.2	43.1	49.6	50.5
Good health	35.4	34.0	37.0	33.6	33.3
Fair health	12.2	10.5	12.5	11.2	11.2
Bad health	5.0	4.0	5.3	4.2	3.7
Very bad health	1.6	1.3	2.1	1.5	1.2

In St Ann's ward 6.6% of residents have bad or very bad health. This is slightly higher than the rate seen in Haringey (5.7%) and London (4.9%) more widely. 15.4% of people in St. Ann's ward have their day-to-day activities limited a little or a lot due to their health condition. This is slightly higher than borough and London's average (14% for LB Haringey and 14.1% for London).

In Haringay ward 5.3% of residents are considered as having bad or very bad health. 12.5% of Haringey's ward residents have their day-to-day activities limited a little or a lot.

In Tottenham Green ward 7.4% of residents are considered as having bad or very bad health. 16.4% of Tottenham Green residents have their day-to-day activities limited a little or a lot. This is relatively higher than in the other considered wards, the borough or London.

There is a high percentage prevalence of excess weight in Year 6 with 43.8% of Year 6

children in St Ann's ward with excess weight. This is above the Haringey (36.1%) and London (36.8%) averages, though not among the highest rates of all Haringey wards. 39.6% of Year 6 children in Harringay ward have excess weight. This is also higher than the Haringey (36.1%) and London (36.8%) averages but is not amongst the highest levels in the borough. 46.8% of Year 6 children in Tottenham Green have excess weight. This is the highest rate of excess weight of all Haringey wards.

Focusing solely on cyclists who have a disability, the [Wheels for Wellbeing Annual Survey 2018](#)<sup>10</sup> of the whole of UK shows that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Survey results also show that 24 per cent of disabled cyclists' bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycling infrastructure was found to be the biggest barrier to cycling.

Improved cycling conditions will benefit disabled cyclists and could potentially encourage people with disabilities to try cycling if their disability allows. Some disabled people rely upon cycling as their primary means of mobility. Cycling conditions within the St Ann's LTN area are likely to see greater improvement under the proposed scheme.

The project aims to decrease motor vehicle traffic creating a safer environment, particularly for disabled people who are more likely to be pedestrians. Quieter roads will also benefit those whose physical impairments necessitate more time to cross the road, or whose mobility aids that may require use of the road, such as mobility scooters.

Low Traffic Neighbourhoods may impact the route and duration of some journeys for those with mobility impairments who may find it more difficult to walk or cycle, and therefore prefer the use of door-to-door transport services such as private cars, taxis, or Dial-a-Ride. The LTN scheme has been designed to minimise the number of modal filters affecting motor vehicle accessibility. Reduced traffic flow on neighbourhood streets is likely to reduce traffic congestion and improve journey times within the LTN area. During the early consultation phase, the public and Blue Badges holders were asked if they have specific needs that require access through the modal filters such that their journeys would not be affected. Quite a few disabled people and their carers were concerned about increased travel times in particular those who relied on taxis.

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 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

<sup>10</sup> <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf#:~:text=Between%20August%20and%20September%202018%2C%20Wheels%20for%20Wellbeing,Disabled%20cyclists%20from%20across%20the%20UK%20took%20part.>



holders<sup>11</sup> living in an LTN area or on the immediate boundary of one 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 separate exemptions.

From the sight loss data tool<sup>12</sup> reports that the estimated prevalence of sight loss is lower in Haringey compared to the average for England, with 2.0% of the population living with sight loss, compared to 3.2% nationally. In Haringey there are an estimated 5,550 people living with sight loss. Visually impaired people will be pedestrians in the affected area, users of public transport or passengers in other vehicles. Visually impaired people will have varying degrees of ability to see the changes in the environment around them. This will include changes to traffic flows or directions of traffic. Although likely to benefit from decreased traffic flows, the initial change could be confusing.

The introduction of a scheme, any changes made during the trial, or removal of the scheme may initially impact residents with certain impairments or disabilities as adapting to changes in their environment can present challenges and take time to adapt to. Any impacts have been minimised through the design of the LTN.

Reduction or elimination of through-traffic is likely to reduce conflict between different road users on the whole. Quieter streets also mean that those travelling with wheelchairs or mobility scooters are able to use the road if they choose to circumvent obstructions on the pavement (e.g. if the pavement is too narrow to navigate due to bins).

### **Race & Ethnicity:**

Studies have found big differences in air pollution across communities in England, with deprived and ethnic minority areas the worst affected. The worst air pollution levels were seen in ethnically diverse neighbourhoods, defined as those where more than 20 per cent of the population are non-white: [Ethnic minorities and deprived communities hardest hit by air pollution, Imperial College London, 2015](#)<sup>13</sup>. [Air Quality Information for Public Health Professionals – London Borough of Enfield, 2013](#)<sup>14</sup> states that deprived communities suffer greater burdens from air-pollution-related death and sickness. Tackling air quality in London would contribute to increasing healthy life expectancy and reducing early death from cardio-respiratory diseases. LTN schemes help tackle this inequality.

Ethnicity	St. Ann's ward (%)	Harringay ward (%)	Tottenham Green ward (%)	LB of Haringey (%)	London (%)
White	54.4%	65.6%	47.2%	60.5%	59.8%

<sup>11</sup> 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.

<sup>12</sup> <https://www.nib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics/sight-loss-data-tool>

<sup>13</sup> <https://www.imperial.ac.uk/news/163408/ethnic-minorities-deprived-communities-hardest-pollution/>

<sup>14</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_lb\\_enfield.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_lb_enfield.pdf)

<b>(Other &amp; British)</b>					
<b>Mixed</b>	6.5%	6.3%	7.1%	6.5%	5%
<b>Asian</b>	12.6%	11.4%	11.1%	9.5%	18.5%
<b>Black</b>	21.3%	11.8%	28.9%	18.8%	13.3%
<b>Other</b>	5.4%	4.7%	5.7%	4.7%	3.4%

The proportion of White residents in St. Ann's ward is 54.4% while for LB Haringey as a whole the proportion is 60.5%.

The proportion of White residents in Harringay ward is 65.6%. There is a slightly larger proportion of residents of White ethnicity compared to the LB Haringey average (60.5%), and a slightly smaller proportion of residents of Black ethnicity (11.8%) compared to the borough average (18.8%).

In Tottenham Green ward the proportion of White residents is 47.2%. The second largest ethnicity group is Black residents (28.9%), proportion higher than LB Haringey's (18.8%) and London's average (13.3%).

The proportion of people of Asian ethnicity varies from 11.1% (Tottenham Green ward) to 11.4% (Harringay ward) and 12.6% (St. Ann's ward), while across Haringey borough on the whole is 9.5%, which is low compared to the London average of 18.5%.

Proportions of mixed and other ethnic backgrounds are slightly higher in LB Haringey (6.5% mixed and 4.7% other) than London's average (5% mixed and 3.4% other).

It is important that the specific views across this variety of ethnic communities, that make up substantial elements of the area's population, are included in the consultation process.

There are some established community groups and organisations representing minority groups in the area that have been contacted and invited to participate in the engagements. They will also be contacted and encouraged to continue engagement with the Council during the LTN trial and beyond. If requested, smaller feedback/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 6<sup>th</sup> highest rate in London and is above the statistical neighbour and London averages. Of those whose main language is not English in 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 glance – State of the Borough April 2021 report<sup>15</sup>.

All printed consultation materials were available in other languages. The project page could also be translated into other languages:

<https://www.haringey.gov.uk/contact/translation-and-interpreting-services#auto>

The scheme proposal seeks to improve air quality in the area and thus address one of the key issues that ethnic minority groups tend to experience. If Option A is introduced, we

<sup>15</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)



expect some of this traffic will divert to the main roads surrounding the LTN and possibly beyond as they seek alternative routes. This is likely to lead to an increase in traffic on the main roads, at least until things settle down. Some drivers will shift to other modes like walking, cycling or using public transport or travel at different times of the day or even stop commuting ( e.g. work from home). Experience from other LTNs introduced in London in 2020 has shown that after a few months of a 'settling in' period, the overall traffic levels reduced within the LTN boundaries and in most cases the impact on the surrounding main roads was not significant.

### Religion:

It is important that the specific views of the range of religious groups and communities are included in the consultation process.

There are some established faith/religious groups in the area, and they have been contacted and invited to take part in the engagement. They will also be contacted and encouraged to take part during future consultation phases.

Religion	St. Ann's ward (%)	Harringay ward (%)	Tottenham Green ward (%)	LB of Haringey (%)	London (%)
Christian	46.5	39.0	50.9	45.0	48.4
Buddhist	1.2	1.3	1.4	1.1	1.0
Hindu	2.3	2.5	1.6	1.8	5.0
Jewish	0.7	0.6	0.6	3.0	1.8
Muslim	17.1	14.1	17.7	14.2	12.4
Sikh	0.3	0.3	0.1	0.3	1.5
Other religion	0.4	0.7	0.5	0.5	0.6
No religion	22.4	32.7	18.6	25.2	20.7
Religion not stated	9.0	8.7	8.5	8.9	8.5

Religious identity in St Ann's ward largely follows the wider borough pattern, with Christianity (46.5%) the main religion and Islam representing the second largest religion (17.1%). St Ann's has a very small proportion of Jewish residents (0.7%) compared to LB Haringey more widely (3%).

Harringay ward has a larger proportion of residents identifying as having no religion (32.7%), compared to the wider borough (25.2%). The ward also has a smaller proportion of residents identifying as Christian (39%) than is seen across Haringey (45%).

Over half of Tottenham Green ward residents identify as Christian (50.9%), a higher proportion than the Haringey average (45%). By contrast, Tottenham Green has a smaller proportion of residents saying they have no religion (18.6%), compared to the level in Haringey (25.2%).

The Muslim community is the second largest in all three wards which is consistent with the wider borough and London; however, the percentage is higher by 2-4% in the borough than in London.

Improving conditions for walking and cycling is likely to positively benefit those who attend places of worship on foot, by bicycle or using a mobility scooter. Amenities such as these are generally attended by those who live and work locally. Although it is acknowledged

that this scheme is likely to increase some journey times for some worshippers who drive to their place of worship, all drivers will continue to have vehicle access to their destination.

Religious commitments can sometimes leave little time for sporting activities, for example, as young Asian Muslims attend mosque after school, they do not have much leisure time as those from non-religious backgrounds as stated in [Barriers to Cycling for Ethnic Minorities and Deprived Groups](#)<sup>16</sup>. Therefore, creating environments that enable and encourage people to cycle more often can lead to exercise being built into their day, rather than them having to go out of their way to achieve it.

### **Marriage and Civil Partnership:**

This characteristic is only applicable in contexts where the scheme relates to employment.

### **Pregnancy/ Maternity:**

Census data does not provide pregnancy nor maternity statistics. It is important to ensure the designs are suitable for parents with young children as well as accessible with prams, and children with special educational needs.

Reduction of through-traffic is likely to reduce conflict between different road users on the whole. This will reduce the risk of road traffic collisions involving pedestrians particularly pregnant women, parents and guardians with infants and/or young children. This will also provide benefits to pedestrians travelling with prams who require additional time to navigate kerbs when crossing the street. Quieter streets also mean that those travelling with prams are able to use the road if they choose to circumvent obstructions on the pavement (e.g. if the pavement is too narrow to navigate due to bins).

Improvements in air quality are likely to particularly benefit infants and children who are more vulnerable to breathing in polluted air than adults due to their airways being in development, and their breathing being more rapid than adults. Their face is usually lower than those of adults, as children in prams stay closer to the direct source of pollutions and fumes. The implementation of the scheme may alter some car journey routes and times for a portion of those who are pregnant and for parents with infants and/or young children who may find it more difficult to walk or cycle, and therefore prefer the use of door-to-door transport services such as private cars or taxis.

Expectant mothers and mothers who have recently given birth may have increased numbers of medical appointments. Where this travel is made by car, some journeys may take slightly longer, but where the journey is walked or cycled through the project area, it is likely to be less polluted and have reduced volumes of traffic. Furthermore, exposure to poor air quality while at home should reduce over time as a result of mode shift away from private car trips.

There are some established pre/post-natal groups, parent groups and nurseries which have been invited to take part in the engagement. They were contacted and encouraged to take part during the early consultation and will continue to be encouraged during future consultation phases.

<sup>16</sup> <http://content.tfl.gov.uk/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups-summary.pdf>

### Other marginalised groups:

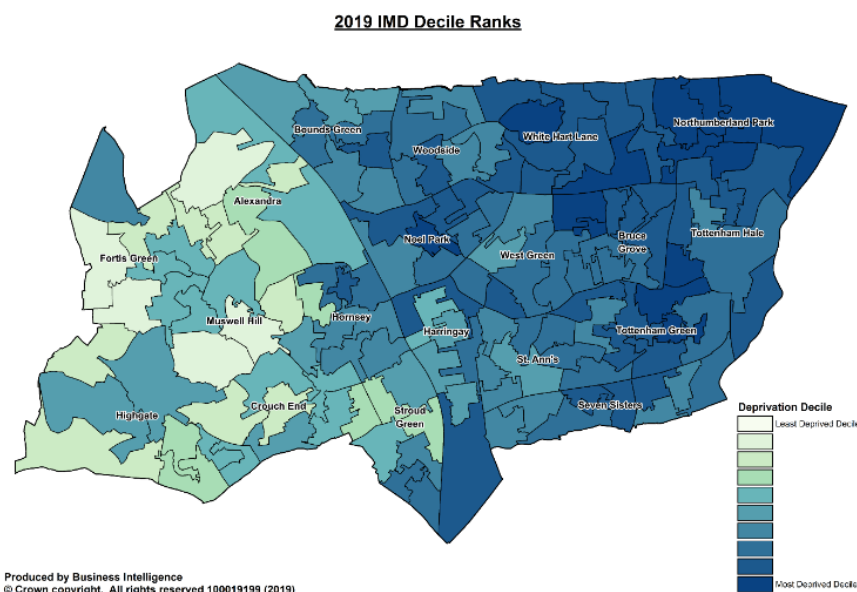
Haringey have aimed to ensure that homeless or unemployed people are not any more likely to be victimised as a result of the scheme.

There are some established groups representing these groups in the area and they have been contacted and invited to take part in the engagements.

Census data does not provide information on homelessness, however [Haringey State of the Borough profile](#)<sup>17</sup> states that:

*In [London Borough] Haringey people are generally seen bedding down in the Finsbury Park, Wood Green and Tottenham areas; the majority are people who have not been contacted by outreach workers before and are not seen for a second night. A very small number of people rough sleeping in Haringey are classed as living on the streets (LOS). In Haringey, only 15% of people identified as rough sleeping are women.*

*Haringey is the 4th most deprived borough in London, with deprivation more concentrated in the north east. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly:*



Digitally excluded groups, including homeless and those with homes without or limited access to internet, have been accommodated by ensuring the engagement materials are displayed in a publicly accessible place such as library. There will be an engagement board and letterbox type facilities will be provided for offline feedback, to enable them to provide feedback on the designs.

The Travel in London Report 12<sup>18</sup> shows there is a strong correlation between low income households and car ownership. St Ann's ward only 40.4% of households own 1 or more

<sup>17</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)

<sup>18</sup> [travel-in-london-report-12.pdf](https://www.tfl.gov.uk/about-us/transport-planning-and-research/travel-in-london-report-12.pdf) (tfl.gov.uk)

cars, Harringay 38.2% and Tottenham 34.9% compared to 48.2% Haringey borough wide and 58.4% in London<sup>19</sup>.

TfL research shows that low-income Londoners also tend to travel less frequently than Londoners overall – 2.2 trips per weekday on average compared to 2.4 among all Londoners. Among this group, a greater proportion of journeys are completed for the purposes of shopping and personal business: 31 per cent of Londoners with household income of less than £20,000 compared with 22 per cent all Londoners (in line with 31 per cent and 22 per cent observed in 2013/14)<sup>20</sup>.

Londoners in lower income households are the most likely EqIA group to use the bus at least weekly; seven in 10 Londoners in households with an annual income of less than £20,000 do so (69 per cent).

St Ann's ward ranks quite low on the IMD decile. Cycling and walking present a low-cost form of transport and can connect people safely and quickly to local shopping centres, as well as to public transport stations as part of multi-modal longer distance journeys (e.g. into inner London). As such, the proposed improvements to the St Ann's area will benefit those cycling and walking and therefore are likely to benefit those without access to cars. Thus lower income households may disproportionately benefit from improved walking journeys to bus services and cycling routes compared to higher incomes households that travel by car.

Some primary roads could experience the impacts of reassigned traffic in the short term. These roads may have pockets of dense housing on them and so the impact on the residents needs to be monitored.

#### **4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?**

*Please outline which groups you may target and how you will have targeted them*

**Further information on consultation is contained within accompanying EqIA guidance**

The Communications and Engagement activity undertaken to support the St Ann's LTN proposal aligns with the Council's obligations under the Equality Act 2010. The programme took the following steps to ensure those obligations were met and will continue to be met in the future:

- The option to request consultation materials in different languages or braille for those who request it;
- Individuals are able to request a telephone call to discuss the proposals and printed copies of the materials presented;

<sup>19</sup> [Equality Impact Assessments \(EqIA\) | Haringey Council](#)

<sup>20</sup> <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

- Sub-titling for online events if requested by anyone who is hard of hearing will continue;
- A postal address is provided so individuals who are not able to submit feedback online can still participate in the programme;
- Any locations where physical material is available are accessible locations; and
- Translation and sign language options offered where necessary and possible.

Several communication channels exist to support this project which have been utilised throughout this campaign. These include:

- Haringey Council Corporate Website and social media accounts;
- Council newsletters and mailing lists;
- Commonplace platform; and
- Local media and blogs.

In addition, the following communications collateral have been produced to support the project:

- Newsletter/mailedrop for local residents;
- Letters/emails to stakeholders;
- Project poster;
- Information boards;
- Digital and physical map of proposed interventions;
- Technical briefing documentation;
- FAQ documents; and
- Social media content.

To support all of this material, a project plan, FAQ document have been produced. Key messaging will be reviewed over the course of the project period, as the project evolves. Several engagement tools have been and will continue to be used as part of the process. This includes:

- Dedicated webpage;
- Physical pop-up events at key areas within St Ann's project area;
- Stakeholder meetings, including with ward councillors, MPs and London Assembly Member;
- Targeted stakeholder meetings to engage with those seldom heard and those groups identified in this EqlA;
- Webinar sessions with participative element;
- Commonplace platform, utilising the interactive engagement mapping and survey functions;
- Engaging with the Haringey Transport Forum;
- Bespoke business survey;
- A disabled people and carers survey;
- Business Perception survey, which also had an on-line (SNAP) version
- Email account, phone number and postal address for the receiving feedback from residents groups; and
- Consultation material available at St Ann's Library.

Taken together, these tools provided residents with multiple opportunities to provide feedback on the proposals for reducing the traffic in St Ann's area.

All identified community stakeholder groups (identified through our stakeholder mapping) have been written to during the engagement stages, to invite them and their members to participate in the engagement process. The following community engagement activities took place during the engagement period:

- Two meetings with schools to brief on LTN proposals in St Ann's, Bruce Grove and Bounds Green. These took place on 28 April 2021 and 30 April 2021.
- A meeting with ward councillors was held on 10 May 2021.
- A meeting with organisations representing those with disabilities on 19 May 2021.
- An online disabled people and carers survey has taken place since 10 May 2021 to 3 September 2021, with paper copies sent to blue badge holders and representative groups in the area.
- Two public workshop sessions were held on 24 May 2021 and 25 May 2021, with representatives of Haringey Living Streets, Fountain Area Residents Association, Ladder Community Safety Partnership, Healthy Streets St Ann's, and Haringey Cycling Campaign attending the workshops.
- A meeting was held with the St Ann's Healthy Streets group on 27 May 2021.
- A meeting with several stakeholder groups in St Ann's was held on 15 June 2021.

At these sessions, the feedback from the earlier engagement stages was presented detailing the issues and suggested improvements raised. Attendees were also invited to discuss the requirements of the groups they represent and provide feedback.

The interactive engagement map survey (hosted by Commonplace) ran from 4 February May to 7 March 2021, which provided residents the opportunity to comment on the issues and suggested improvements for the area. This has been hosted on Commonplace platform and also the project page, allowing continuity for people who previously participated in the early engagement exercises. Residents have also been provided with a link to this in the mailshot that was sent to them.

Each engagement stage has included monitoring questions looking to collect:

- Demographic data;
- Information about how participants currently travel around the area;
- Feedback on the options that focus on:
  - What to keep;
  - What could change; and
  - What is missing.
- Any accessibility considerations or concerns the design team should consider.

A consultation was held between 23 August to 17 September 2021 as part of the engagement, to enable residents, businesses and stakeholders and those travelling through the proposed LTN area and affected adjacent areas to comment on two LTN schemes. Consultation material including a leaflet summarising the proposed options and a questionnaire was posted to all the households and premises within the scheme area and adjacent roads. These outlined the St Ann's LTN options and associated impacts and asked for feedback on the proposals. The consultation included the following activities:

- Further stakeholder engagement, including schools and emergency services,
- All Haringey Councillors, MPs and London Assembly Member briefings;
- Pop-up session at school gates and St Ann's library.
- Perception survey in physical and on-line digital (SNAP) form
- On-line accessible formats for the leaflet and survey

A display of the options proposed during the public consultation stage and an opportunity to provide feedback offline, was provided at St Ann's Library, including:

- The consultation leaflet provided background information on the proposed options and information about the opportunities to participate in the consultation process;
- Paper surveys and a feedback box for individuals to complete, which were collected by the project team;

Six pop-up sessions were held across the area to engage the public and encourage participation:

- Saturday 4<sup>th</sup> September, 10am – 2pm, Chestnuts Park
- Wednesday 8<sup>th</sup> September, 2.30pm – 4pm, St Ann's Primary School
- Thursday 9<sup>th</sup> September, 2.30pm – 4pm, Chestnuts Primary School
- Friday 10<sup>th</sup> September, 2.30pm – 4pm, West Green Road Primary School
- Saturday 11<sup>th</sup> September, 10am – 2pm, St Ann's Library
- Monday 12<sup>th</sup> September, 2.30pm – 4pm, Seven Sisters Primary School

In addition, a series of lamp post wrap around signs were distributed in locations throughout St Ann's, and emails were sent to all individuals who participated in the previous stages of engagement, to encourage them to complete the survey.

This EqIA is a live document and will continue to be developed during the course of this project.

#### **4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics**

*Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?*

An online interactive engagement mapping survey (hosted by Commonplace) was held from 4th February 2021 and showed that traffic speed and volumes were the top concerns. The issue raised most frequently was 'traffic speeding', which was mentioned in 54% of comments or agreements. The suggested improvement raised most frequently was 'reduce traffic volumes', which was mentioned in 48% of comments or agreements.

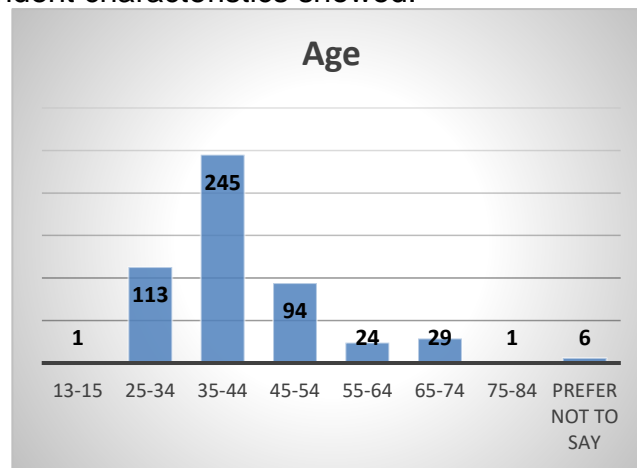
Top issues raised by residents and stakeholders:

- Traffic speeds (54% comments/agreements)
- Poor cycling environment (46% comments or agreements)
- Traffic volumes (46% comments or agreements)
- Rat running traffic (46% comments or agreements)
- Traffic safety concerns (45% comments or agreements)

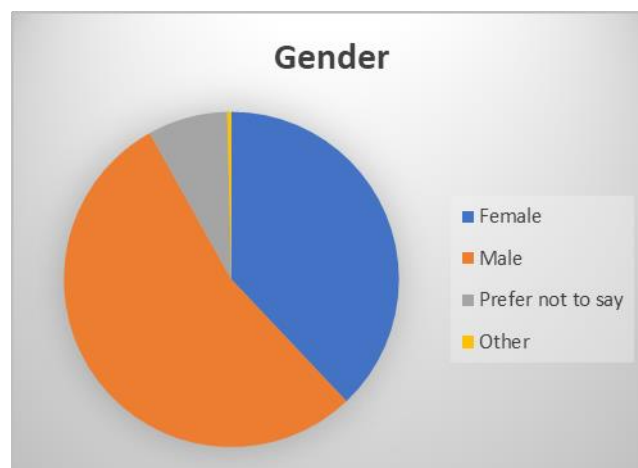
Top suggested improvement by residents and stakeholders:

- Reduce Traffic Volumes (48% comments/agreements)
- Reduce traffic speeds (40% comments/agreements)
- More cycle infrastructure (33% comments/agreements)
- Increase traffic and speeding enforcement (33% comments/agreements)
- Permanent road closure (30% comments/agreements)

Overview of the respondent characteristics showed:



The younger and older generation was underrepresented in the Commonplace survey. This could be due to limited knowledge or access to the internet in the much younger and older generation. To help engage these age groups during the pre-construction engagement and early consultation, leaflets and questionnaires were placed at St Ann's Library. Early school engagements took place and school pop ups took place as part of the consultation.



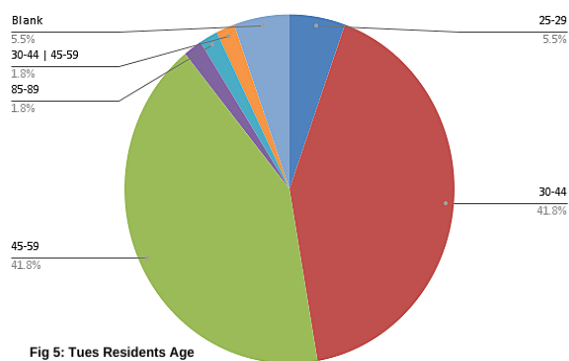
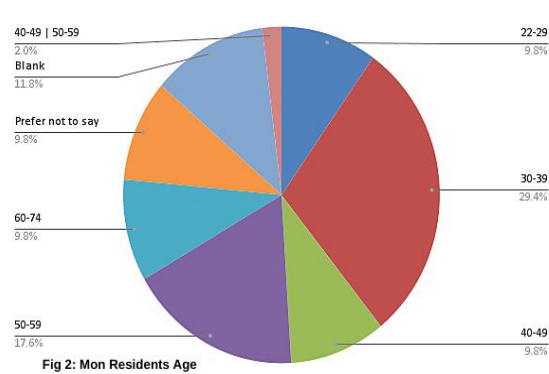
Women were also slightly under represented in the Commonplace survey. Haringey Women's Forum was invited to participate in the two public design workshops (24 & 25 May 2021) and a stakeholder's workshop (15 June 2021). They were contacted and encouraged to take part during the public consultation.



A disability workshop session was held on the 19 May 2021 with Disability Action Haringey and Wheel for Wellbeing. Concerns raised during the workshop are as below and have been further investigated:

- The lack of an inclusive access at the entrances to Brunswick Park was raised, with one representative feeling the current arrangements could violate the Equality Act 2010. Whilst Brunswick Park is outside the scope of the project, the feedback has been noted.
- Concerns around access to Avenue Road, which used to be a two-way road but is now a one-way road, as residents now have to travel via Cornwall Road and Gorleston Road. They would prefer if Avenue Road could be reverted back to a two-way road.
- There is an aspiration that Avenue Road would be restricted during school pick up and drop off times.
- There were concerns that the School Streets could direct more traffic via Black Boy Lane. Additional access may be required so people can get to homes during School Streets if travelling by car.
- A general discussion was had about the need to generally improve the footways in the area to make sure they are accessible to wheelchair users and those with visual impairments.

During the design workshops held on the 24 and 25 May 2021, it can be seen that the different age groups were better represented on Monday 24 May 2021, whereas the younger and older ages were under represented on the 25 May 2021



However, overall the majority of attendees, 53%, were under the age of 50, with the vast majority of those, 40% identifying as between the age of 30-44. Only 7% identified themselves as over 60. This corresponds with the St Ann's ward profile demographic which indicates the largest proportion of residents fall between the age of 20-44 (49.9%). Only 8.7% of the ward are over the age of 65.

Females were still slightly under represented during these engagements:

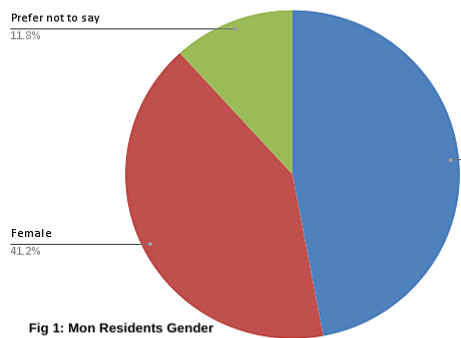


Fig 1: Mon Residents Gender

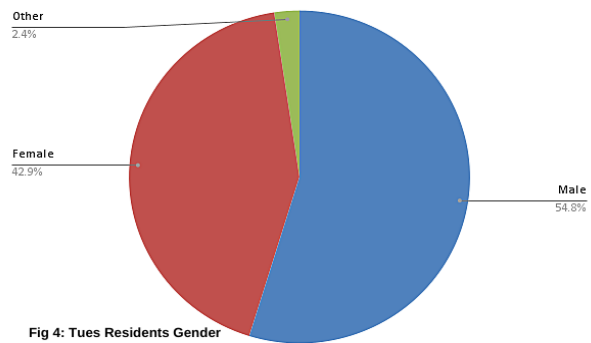


Fig 4: Tues Residents Gender

Residents and stakeholders living with disabilities were under represented during these design workshops, as such separate consultations will continue to be organised for them.

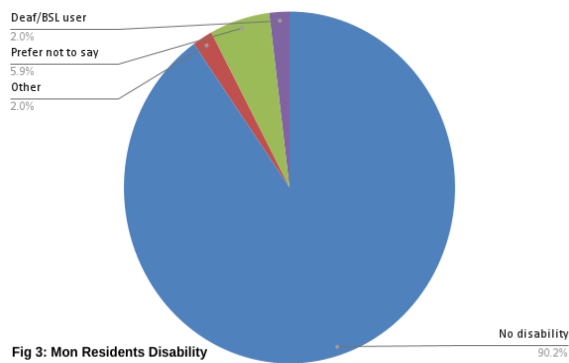


Fig 3: Mon Residents Disability

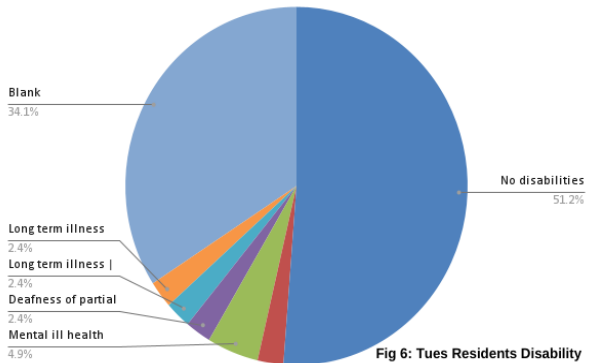


Fig 6: Tues Residents Disability

With regard to ethnicity, 13% of individuals described themselves as coming from an Asian, Asian British, Black, Black British, Mixed, or other background. When compared to the ward profile for St Ann's, there was an over-representation of White British individuals participating in the process, and an under-representation of the White Other group, which is the largest in the ward.

The final stakeholder group session took place on 15 June 2021 and it was attended by the following groups:

- Haringey Living Streets
- Fountain Area Residents Association
- Ladder Community Safety Partnership
- Healthy Streets St Ann's (two representatives)
- Haringey Cycling Campaign
- TFL (though as a non-participating member, providing additional insight from TFL)

During the design workshop sessions, the attendees generally welcomed the LTN schemes based on the options presented. Of the two options presented, Option A included a modal filter with a bus gate on Black Boy Lane and Option B retained the southbound movement on Black Boy Lane but removed all other through movements – this second option has not been progressed based on the feedback at the workshops, with an alternative option (Option B) developed for the consultation stage.

There were a minority of attendees who voiced opposition to any type of intervention on Black Boy Lane. That sentiment was accompanied by general opposition to the installation of a Low Traffic Neighbourhood in the St Ann's area. Issues such as the ability of elderly and disabled people to access their properties were raised when this sentiment was expressed. The impact of the proposals on St Ann's Road (and the subsequent knock onto Green Lanes) was raised on several occasions. Concerns were raised that any LTN intervention could result in additional use of St Ann's Road with the potential for increased speeds, and "anti-social" driving behaviours. Suggestions were made including the provision of a speed camera on St Ann's Road to ensure compliance with speed limits. A small minority of residents asked about the impact of this scheme on the Harringay Ladder roads and asked when measures would come forward to reduce vehicle movements in this area. There was some concern that Wightman Road may bear the brunt of the displaced traffic and drivers may use some of the Ladder Roads to access it. There were also concerns that the removal of all north and south connections, as outlined in Option One, would have a negative impact on Green Lanes, which already has severe traffic issues.

Those expressing a preference for the Option 1 argued it would address existing issues on Black Boy Lane and align with the objectives of a Low Traffic Neighbourhood project. By letting traffic travel southbound on Black Boy Lane, as per the second option, it was argued the existing issues on the road would not be addressed, and that other roads, such as Abbotsford Avenue, could also act as a rat run.

There is a desire within the community to see School Streets made permanent outside St Ann's Primary School, West Green Primary School and Chestnuts Primary. There is a broad consensus that reducing vehicular movement and traffic speeds outside schools, particular at the start and the end of the school day, would be a positive measure. This included some individuals who had expressed negative sentiment towards the project in its entirety.

The following issues were also noted during the sessions:

- A request for an exemption to allow Blue Badge holders to pass through the modal filters.
- Support for additional cycle hangars, including specifically on Riches Road, as long waiting lists currently exist.
- A request was received to outline the thinking for integrating cycle routes across St Ann's and the neighbouring LTN areas (Bruce Grove and Bounds Green).
- A suggestion to open Chestnuts Park to cyclists through the existing north gates was received.
- An issue was raised at the area between the end of Rosslyn Road that led into Brunswick Park, in that motorbikes use the drop curb as an invitation to cut through to West Green Lane. Participants argued this should be addressed to aid pedestrian safety.
- The widening of pavements across the LTN area was an idea that was held on several occasions.
- The installation of speed cameras on St Ann's was raised as a potential option to reduce speeds.

Among those who were supportive of an LTN in stakeholder and community sessions, there was a strong preference for Option A. Very little support for Option B was expressed, and a minority of participants expressed a view against an LTN moving forward.

Feedback was used to refine the preferred option to form Option A. A new (Option B) was developed, based on concerns around the potential wider impact of the scheme. Where possible feedback from the engagement was taken on board through the design process, for example the degree of traffic restrictions and specific locations of modal filters and cycle hangars.

A consultation was held from 23 August to 17 September 2021 to enable residents and stakeholders to provide comments on Option A and Option B. Leaflets were distributed to every resident and business within the St Ann's LTN area providing a detailed summary of the two LTN options, along with a perception survey. Paper copies of the survey were also made available at St Ann's Library, alongside a display of A1 information boards which provided information on the two options for residents. An accessible consultation leaflet and survey were also published on the Council website for any resident or business who required the information in this format. The primary means through which feedback was received through the consultation process was through a perception survey. Analysis of the demographics of the respondents showed that:

#### Gender

- Among participants slightly more respondents identify as female as opposed to male.

Gender	Total	Percentage	LB of Haringey (%)
Man	458	44%	49.5%
Woman	486	47%	50.5%
Other	6	1%	No Data
Non binary	5	<1%	
Prefer not to say	78	8%	
<b>Total</b>	<b>1033</b>	<b>100%</b>	<b>100%</b>

#### Ethnicity

- 67% of participants identified as white, with "*prefer not to say*" constituting the second most popular answer.
- There was an underrepresentation of Black/African/Caribbean/Black British individual when compared to the ward level data.

Ethnicity	Total	Percentage	LB of Haringey (%)
Asian/Asian British	39	4%	9.5%
Black/African/Caribbean/Black British	48	5%	18.8%
Mixed/Multiple Ethnicities	51	5%	6.5%
White	691	67%	60.5%

Other	30	3%	4.7%
Prefer not to say	163	16%	
Jewish	2	<1%	
Chinese	1	<1%	
<b>Total</b>	<b>1025</b>	<b>100%</b>	<b>100%</b>

#### *Physical and mental health conditions*

- 15% of participants identified as having a long term physical or mental health condition, which is broadly in line with what is outlined within the St Ann's ward profile.

<b>Do you have any long term physical or mental health conditions?</b>	<b>Total</b>	<b>Percentage</b>
Yes	158	15%
No	783	76%
Prefer not to say	86	8%
<b>Total</b>	<b>1027</b>	<b>100%</b>

#### *Age*

- 55% of participants identified as being under the age of 44.
- Compared to the wider ward demographics, there was a slight overrepresentation of over 65s.

<b>What age group are you?</b>	<b>Total</b>	<b>Percentage</b>	<b>LB of Haringey (%)</b>
<15	0	0%	19.3%
16-24	15	1%	13% (age 15-24)
25-34	202	20%	22.2%
35-44	354	34%	16.8%
45-54	174	17%	12.2%
55-64	107	10%	7.8%
65-74	80	8%	4.9%
75+	32	3%	3.8%
Prefer not to say	68	7%	
<b>Total</b>	<b>1032</b>	<b>100%</b>	<b>100%</b>

#### *Religious affiliation*

- Based on ward profile data, there was an underrepresentation of individuals who identify as Christian or Muslim.
- The largest group was those who have no religious affiliation which was the option selected by 59% of respondents.

<b>What is your religion?</b>	<b>Total</b>	<b>Percentage</b>	<b>LB of Haringey (%)</b>
No religion	608	59%	25.2%
Christian	169	16%	45.0%
Buddhist	10	1%	1.1%
Hindu	4	<1%	1.8%

Jewish	24	2%	3.0%
Muslim	25	2%	14.2%
Sikh	1	<1%	0.3%
Other	12	1%	0.5%
Prefer not to say	151	15%	8.9%
<b>Total</b>	<b>1004</b>	<b>100%</b>	<b>100%</b>

In the perception survey, quantitative questions were asked to test the sentiment towards the two options and the proposals associated with each. Respondents could choose along a 5 point scale ranging from 1 negative to 5 positive or an “I don’t know/undecided” option. When asked “*How do you feel about Haringey proposing to reduce motor vehicle traffic in the St Ann’s LTN?*” 63% of respondents picked the most positive option when answering this question, with 26% opting for the most negative option, indicating strong general support for proposals to reduce motor traffic in the area. Responses from residents who lived on the boundary roads expressed slightly less support, with 53% picking the most positive option, and 31% opting for the most negative. However, more participants were positive than negative.

Option A received a significantly more positive response than Option B. The average score for Option A, when “*don’t knows*” are removed, is 3.5, and 58% of participants provided the most positive ranking when asked. The average score for Option B is 2.6, and only 19% provided a score of five. 32% gave Option B the most negative score possible. The results from the residents on the boundary roads were slightly more mixed. Full detail analysis of the results can be found in the Consultation Report.

#### *Option A:*

Those who expressed a positive sentiment to Option A did so based on the following themes:

- Reducing through traffic and the speed of vehicles outside of the local primary schools and other local social infrastructure. This was particularly true of Black Boy Lane and Avenue Road which both have schools on them.
- Improvements to air quality within the LTN area that is generated because of a reduction in through traffic.
- Improvements in cyclist safety making it more likely to encourage active travel within the St Ann’s area.

The main themes that have emerged in opposition to Option A in the qualitative analysis of the survey data are as follows:

- The scheme will divert traffic onto the boundary roads to a significant extent and not achieve the desired reduction of traffic sought.
- Pollution will be created as journey times will be lengthened, with air quality worsening on boundary roads, most particularly West Green Road and St Ann’s Road.
- An LTN will result in increased traffic on Green Lanes, which will have a negative impact on the businesses that operate there.

- Access to properties will be made more difficult for those who are disabled and those people that care for them.

The concern about the re-assignment of traffic onto the boundary roads was particularly strong among those who were in opposition to the scheme and living or operating a business on those boundary roads.

There was strong support for the additional cycle hangers, the new Zebra crossings and school streets.

There was a response from a woman who shared taxi services at night for safety who felt that the LTN would cause a barrier for this to work efficiently.

There were email responses to the public consultation from a couple of residences that are disability carers that use Hackney carriages, who expressed concern about access and that their journey times would be increased due to the LTN.

The majority of the responses to the Disability and Carers survey, held from 10 May 2021 to 1 September 2021, that were specific to a LTN in St Ann's ward had an overall negative sentiment. The most common themes raised by those expressing a negative view were as follows:

- The LTN would make the area inaccessible both to disabled residents and to individuals, including carers, who visit them.
- A perception an LTN in St Ann's would result in additional congestion and traffic.
- A linked perception that an LTN would result in a deterioration of air quality.

## 5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

*Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.*

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

### 1. **Sex** (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

The introduction of a Low Traffic Neighbourhood in Waltham Forest was associated with a decrease in total street crime and antisocial behaviour. This effect increased over time, with an even larger reduction observed for violent and sexual offences. The causative factors are not assessed in detail, yet any proposals that can help keep any threats or likelihood of sexual offences against women at a minimum is a benefit. Women tend to share taxi services late at night to get home safely. The LTN could

create a barrier for this to be done efficiently as it may increase travel times and cost between drop-offs.

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 services.

Less women in London report being able to ride a bike, 79 per cent compared with 91 per cent of males<sup>21</sup>. Increasing residents' access to favourable cycling conditions is likely to benefit women, as the intervention would reduce a significant barrier to cycling.

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 the safer environment the schemes offer. Women who rely on a car as transportation to any further special schools or to provide care may have their journeys altered.

Overall, the air quality, health and mode shift benefits are considered to outweigh the inconvenience caused by longer vehicle journeys to this protected characteristic. Monitoring and further engagement will also take place post implementation.

Option A							
Positive	✓	Negative	✓	Neutral impact		Unknown Impact	

**2. Gender reassignment** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

As far as we are aware there is no clear evidence or data to expect that the LTN proposals will have an impact on Gender Reassignment group. In general with the lower risk of anti-social behaviour this could be seen as a benefit to this group.

Option A							
Positive	✓	Negative		Neutral impact		Unknown Impact	

**3. Age** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

There would be a positive impact to the younger generations as a result of safer roads created via School Streets being introduced at Avenue Road by St Ann's CE Primary School and Woodlands Park Road by West Green Primary School as part of both options. There would also be a reduction of traffic and traffic speeds in the proposed area. Young people would be encouraged to walk and cycle (or scoot) to school, which would help to improve the current child excess weight statistics in the neighbourhood area.

<sup>21</sup> <http://content.tfl.gov.uk/attitudes-to-cycling-2014-report.pdf>



People of young and old age are more vulnerable to poor air quality as shown in the [Air Quality in City of London: A Guide for Public Health Professionals<sup>22</sup>](#) study and discussed throughout this report. Tackling air quality would contribute to increased healthy life expectancy and reducing early death from cardio-respiratory diseases, which would benefit all ages, in particular those more vulnerable such as elderly people or those with poor health.

Elderly people with early dementia or Alzheimer's could become lost or confused if their local environment is significantly changed due to a LTN. Although should they wander, a LTN would provide a much safer place with less traffic. Elderly people also have increased GP and hospital appointments and may need to travel by motor vehicle more due to mobility issues. The proposed scheme may alter their journey times, but St Ann's Hospital and surrounding surgeries are still easily accessible. During the consultation phase, the public and blue badges holders were asked in the Disabled People and Carers Survey if they have specific needs that require access through the modal filters so that their journey would not be affected. Quite a few disabled people and their carers were concerned about increase travel times in particular those who relied on taxis.

Option A							
Positive	✓	Negative	✓	Neutral impact		Unknown Impact	

**4. Disability** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey<sup>23</sup> shows that 72 per cent of disabled cyclists use their bike as a mobility aid, and 75 per cent found cycling easier than walking. The survey results show that 24 per cent of disabled cyclists' bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling. Improved cycling conditions will benefit disabled cyclists and could potentially encourage people with disabilities to try cycling if their disability allows.

The introduction of any scheme, any changes made during the trial, or removal of the scheme may initially impact residents with certain impairments or disabilities like sight impairment, neurodiversity or mental health conditions. Adapting to changes in their environment can present challenges, cause frustration and require time to adapt. Although they are likely to benefit from decreased traffic flows as they are less likely to drive, as there would be a safer environment and better air quality, the initial change could be confusing in both options.

Reduction or elimination of through-traffic is likely to reduce conflict between different

<sup>22</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_city\\_of\\_london.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf)

<sup>23</sup> Wheels for Wellbeing Annual Survey 2018: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-final.pdf>

road users on the whole. Quieter streets also mean that those travelling with wheelchairs or mobility scooters are able to use the road if they choose to circumvent obstructions on the pavement (e.g. if the pavement is too narrow to navigate due to bins).

Those with disabilities may have increased GP and hospital appointments and the options may negatively impact on some journey times for those with mobility impairments who may find it more difficult to walk or cycle, and therefore prefer the use of door-to-door transport services such as private cars, taxis, or Dial-a-Ride.

During the consultation phase, the public and Blue Badge holders were asked if they have specific needs that requires access through the modal filters such that their journey would not be affected. There are concerns from the residences about access issues, in particular for those who regularly need to use a taxi and may experience higher fares and longer delays.

Option A							
Positive	✓	Negative	✓	Neutral impact		Unknown Impact	

**5. Race and ethnicity** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Evidence from the Waltham Forest report shows a decline in anti-social behaviour, which could reduce violence or victimisation based on race and ethnicity.

Deprived and ethnically diverse neighbourhoods were found to have the worse air pollution levels<sup>24 25</sup>, as discussed throughout this report. Tackling air quality would contribute to increasing healthy life expectancy and reducing early death from cardio-respiratory diseases in this protected group.

There are many ethnic shops and restaurants around St Ann's, from the Oriental Food Store in the south east corner of St Ann's to the Cudi Food Centre and Eternal Dit:Food Store – Congolese & afro Caribbean Food Store in the north west. There are quite a few ethnic restaurants along West Green Road; Jambo Zamsareh (Ugandan) Restaurant, Hing Wong Chinese takeaway etc. The scheme would encourage walking and cycling in the local area which may improve shop/restaurant traffic having a positive effect on Black, Asian, and minority ethnic (BAME) economic outcomes. However, many of these businesses are on the boundary road, which may have increased traffic due to the LTN implementation.

A business walkaround for the perception survey took place in the early consultation phase, and discussions were held in regards to the impacts on deliveries and logistics. There were concerns there was insufficient parking for staff and customers and very limited space for deliveries. When they were asked how supportive they were of efforts to improve cycling infrastructure in their local

<sup>24</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_lb\\_enfield.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_lb_enfield.pdf)

<sup>25</sup> <https://www.imperial.ac.uk/news/163408/ethnic-minorities-deprived-communities-hardest-pollution/>

area, a mixed picture emerged. The most common response respondents gave was five, (30 per cent). After this, the most common response was three (25 per cent), followed by one (19 per cent).

Monitoring and further engagement will also take place post implementation, with material available in different languages.

Option A							
Positive	✓	Negative		Neutral impact		Unknown Impact	

**6. Sexual orientation** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

No clear evidence or data to expect the proposals will impact on this group

Option A							
Positive		Negative		Neutral impact	✓	Unknown Impact	

**7. Religion or belief (or no belief)** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Improving conditions for walking and cycling is likely to positively benefit those who follow a religion and attend a local place of worship. Destinations such as this are generally used by local community. The proposal area is quite religiously diverse. There are quite a few churches surrounding St Ann's ward and on the east side the Sheikh Nazim Sufi Centre south of St Ann's Road and Seven Sisters Masjid (mosque) north of West Green Road. These would be quite easy to walk or cycle (scoot) to for the local community. There are also additional Muslim places of worship further northwest of St Ann's; Islamic Cultural Society Mosque and the Taiba Mosque Complex Community Centre. 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.

Religious commitments can sometimes leave little time for sporting activities, for example, as young Asian Muslims attend mosque after school, they do not have much leisure time as those from non-religious backgrounds as stated in [Barriers to Cycling for Ethnic Minorities and Deprived Groups](http://content.tfl.gov.uk/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups-summary.pdf)<sup>26</sup>. Therefore, creating environments that enable and encourage people to cycle more often can lead to exercise being built into their day, rather than them having to go out of their way to achieve it.

<sup>26</sup> <http://content.tfl.gov.uk/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups-summary.pdf>

Overall, the air quality, health and mode shift benefits are considered to outweigh the inconvenience caused by longer vehicle journeys for these protected characteristics. Monitoring and further engagement will also take place post implementation, with material available in different languages.

Option A							
Positive	✓	Negative	✓	Neutral impact		Unknown Impact	

**8. Pregnancy and maternity** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

A LTN may negatively impact on those 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 such as private cars or taxis. 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.

Mothers attending courses by vehicle at the Positive Mama Hypnobirthing and Antenatal or Relaxation centres inside St Ann's area may have their journeys altered due to the scheme. But both centres can still be easily accessible by travelling south from West Green Road or north from St Ann's Road respectively. Those attending St Ann's Hospital who are travelling from the north of the hospital would be likely to have their journeys altered due to the restrictions on Black Boy Lane and Cornwall Road. However, the hospital would still be easily accessible from Seven Sisters Road and Green Lane, although the journey time may have increased.

At the same time, there are many parents who travel with their children either using a toddler bike seat, cargo bike or bikes with trailers. These parents will benefit from the proposals.

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 due to their airways being in development, their breathing being more rapid than adults as well as the fact that when walking or seating in the pram, they are positioned closer to the direct source of fumes.

Overall, the air quality, health and mode shift benefits are considered to outweigh the inconvenience caused by longer vehicle journeys for this protected characteristic. Further investigation on impact will be conducted during the post implementation phase.

Option A							
Positive	✓	Negative	✓	Neutral impact		Unknown Impact	

**9. Marriage and Civil Partnership** *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

N/A

Positive		Negative		Neutral impact		Unknown Impact	
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**10. Groups that cross two or more equality strands e.g. young black women**

Impact covered within respective EQIA group.

**Outline the overall impact of the policy for the Public Sector Equality Duty:**

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?  
This includes:
  - a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
  - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
  - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The disabled and elderly have higher doctors 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. Option A would have a greater affect than Option B, as the modal filters have been proposed to remove vehicle access running from the north to the south and vis versa. Those attending St Ann's Hospital or Grove Road Surgery who are travelling from the north of St Ann's would have to go around onto West Green Road and take the A105 Green Lanes or A503 Seven Sisters Road, rather than being able to travel directly south to the hospital under the proposed scheme. Those needing to access the Good Health Pharmacy, Spur Road or West Green Surgery in the north of St Ann's from the south would also have to go around onto the A-roads. Traffic on these main roads may cause a significant increase to their journey times. Some primary roads could also experience the impacts of reassigned traffic in the short term. There were concerns from the residences about access issues, in particular for those who regularly need to use a taxi and may experience higher fares and longer delays.

The introduction of any scheme, any changes made during the trial, or removal of the scheme may initially impact residents with certain impairments or disabilities as changes in their environment can cause confusion and adapting can present challenges and would require time. Elderly people with early dementia or Alzheimer's can lose their ability to recognize familiar places easily. They may become lost or confused if their local environment is significantly changed to establish an LTN. However, the LTN would also provide a much safer place with less traffic should they wander. Any impacts have sought to be minimised through the design of the LTN. Although both protected groups are likely to benefit from decreased traffic flows, the initial change could be disconcerting at first.

Both the disabled and elderly would benefit from better air quality resulting from the schemes. 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.

- **Being active:** [According to Wheels for Wellbeing<sup>27</sup>](#) charity that aim for more disabled people in the UK to cycle for everyday journeys – transport, leisure or exercise: *One of the biggest barriers to more Disabled people taking up cycling is the general assumption that Disabled people can't or don't cycle. And Some Disabled people depend on motorised vehicles for their journeys. Other are unable to drive; some find it easier to cycle than to walk'.*
- **Being active:** [Haringey State of the Borough profile<sup>28</sup>](#) states that:
  - Cancer, cardiovascular disease, and lung disease are the main causes of early death (deaths under the age of 75) in Haringey. The most common habits associated with long-term conditions, poor health and early death in Haringey are poor diet, smoking and high blood pressure;
  - One in 5 adults in Haringey have high blood pressure and a third of our residents are not getting enough physical exercise;
  - 2 in 3 adults are overweight or obese (is physically inactive)
- **Being active:** According to [World Health Organization. Global recommendations on physical activity for health; 2011<sup>29</sup>](#) children and young people aged 5–17 years old should accumulate at least 60 minutes of moderate to vigorous-intensity physical activity daily.

**Air pollution:** As stated throughout the report, studies<sup>30,31</sup> have found that deprived and ethnic minority areas are the worst affected, with people of young and old age being more vulnerable to poor air quality. Ethnically diverse neighbourhoods were defined as those where more than 20 per cent of the population are non-white, which

<sup>27</sup> <https://wheelsforwellbeing.org.uk>

<sup>28</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/state\\_of\\_the\\_borough\\_final\\_master\\_version.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf)

<sup>29</sup> <https://www.who.int/home/cms-decommissioning>

<sup>30</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_lb\\_enfield.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_lb_enfield.pdf)

<sup>31</sup> <https://www.imperial.ac.uk/news/163408/ethnic-minorities-deprived-communities-hardest-pollution/>

would apply to St Ann's, Harringay and Tottenham Green Wards. By reducing the volume of traffic both options will help address air quality related inequality.

- **Social interaction:** [A study in Bristol<sup>32</sup>](#) found the number of friends and acquaintances reported by residents was significantly lower on streets with higher volumes of motor traffic. With less traffic there would be an increased opportunity for play streets and encourage visits to the surrounding green spaces, Chestnuts Park and Downhills Park, by foot or cycle. Safer streets would also encourage walking and cycling to community centres and in general, increasing the opportunity for social interactions between those who share a protected characteristic and those who do not and thus greater community interaction.

#### 6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
<b>No major change to the proposal:</b> the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
<b>Adjust the proposal:</b> the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
<b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N
<b>Exemptions:</b> An application process to be introduced making the following eligible for an exemption to non-hard closure filters in the LTN experimental scheme: <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>	Y

<sup>32</sup> <https://core.ac.uk/download/pdf/323897729.pdf>



<b>6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty</b>			
<b>Impact and which relevant protected characteristics are impacted?</b>	<b>Action</b>	<b>Lead officer</b>	<b>Timescale</b>
A bus gate is proposed on Black Boy Lane to enable public transport users to continue using the services on the same route.	Continue to develop the EqlA through the ongoing rial implementation, and monitoring phases to ensure all groups are considered at all stages	Whole project team	Post Implementation
LTN exemptions	<p>An application process to be introduced for the following to obtain exemptions 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>	Whole project team	Implementation – subject to timing of the application process.



**Please outline any areas you have identified where negative impacts will happen as a result of the proposal, but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.**

Some car journeys may be different or take longer, and thus become less convenient as a result of the proposals.

It is the overall impact of the proposal that is being considered, with many benefits to the users, including those living and working across the scheme area. In order to achieve the multiple benefits described throughout the report, including contributing to the local Haringey and wider, outer London mode-shift, some car journey impact may be seen. Emergency services will be permitted to pass through all modal filters with the exception of the modal filter at the northern end of Clinton Road.

**6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:**

Ongoing engagement and formal consultation during the LTN trial period, including with those from EqIA groups.

Qualitative and quantitative monitoring of the trial over a maximum period of 18 months, once implemented.

## 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.

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 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 circumstances 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;

- 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.

### 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.

