

Report for: Record of Decision Taken Under Delegated Authority

Item number:

Title: Proposed increase in operation hours to parking in the Tottenham Event Day and Tower Garden Event Day CPZ areas.

Report authorised by: Ann Cunningham, Head of Service for Highways and Parking:

Councillor Chandwani, Cabinet Member for Transformation and Public Realm Investment:

Lead Officer: Jack Jerrom, Parking Schemes Team, River Park House, 1st Floor, N22 7TR, jack.jerrom@haringey.gov.uk, 020 8489 1082

Ward(s) affected: White Hart Lane, Northumberland Park, Tottenham Hale

**Report for Key/
Non Key Decision:** Non key decision

1.0 Purpose

- 1.1 To report the outcome of the public consultation undertaken for increasing operational hours for the event day parking zones surrounding the Tottenham Hotspur Stadium. This consultation focuses on two zones:
 - Tottenham Event Day (TED) zone.
 - Tower Gardens Event Day (TGED) zone.
- 1.2 Residents and businesses in the two zones were invited to comment on the proposal to introduce daily parking controls, their current parking pressures and the introduction of simplified but increased event day controls.
- 1.3 A summary of the consultation undertaken and engagement with Ward Councillors is set out within Section 8 of this report.
- 1.4 Officer recommendations for which approval is sought is detailed in Section 9 of this report.

2.0 Background

- 2.1 In 2008, 'Match Day' parking controls were introduced in the area surrounding the existing Tottenham Hotspur football ground. In recent years, that zone has expanded due to resident requests. With the construction of a new stadium, the area was renamed as the Tottenham Event Day Zone to reflect the wider variety of events that are expected to be held at the stadium.
- 2.2 Event day parking controls currently operate only when events are being held at the stadium. The operational times are Monday to Friday, 5pm to 8.30pm; Saturday, Sunday and Public Holidays, 12noon to 8pm.
- 2.3 In January 2019, with the assistance of an external consultancy Haringey undertook an online only public consultation to review the operation of Tottenham Event Day (TED) and Tower Gardens Event Day (TGED) zones.
- 2.4 The outcome of this consultation showed the overall majority of those responding from TED and TGED supported week day controls, with 53% in favour from TED and 51% from TGED.
- 2.5 Of those in favour of controls being introduced, 70% from TED supported Mon – Sat, 8am to 6.30pm and 84% from TGED supported Mon – Sat, 8am to 6.30pm.
- 2.6 Following a meeting with the Cabinet Member for Transformation and Public Realm Investment on 25th June 2019, and subsequent approval of the Delegated Authority report, a statutory consultation was undertaken to introduce weekday CPZ controls with operational times of 8am to 6.30pm Monday to Saturday for Tottenham East, Tottenham West and Tower Gardens Estate CPZ areas.
- 2.7 The statutory consultation resulted in the Council receiving 419 submissions, with 99 in favour and 320 in opposition to the proposed measures. This was a

considerable shift from the responses received during the public consultation. Ward councillors were briefed on the outcome of this consultation and they expressed significant concerns in progressing the proposals further. Similar level of concern was expressed by the Head of Service for Highways and Parking. Upon further discussion with ward councillors, it was agreed to undertake a further public consultation using traditional methods, with every property receiving a consultation document, erection of street posters to notify residents, along with online access to documents. It was hoped that the new consultation method would reach more residents, and therefore would lead to increased responses which would allow the council to understand what is truly resident preference.

3.0 Consultation Results

- 3.1 The new public consultation was undertaken during February and March 2020, ending on 16 March 2020. A copy of the consultation document and questionnaire is in **Appendix 1**.

The consultation sought to notify stakeholders of the increased operating times proposed for the event day controls as these were considered to be important operationally for the stadium to be successfully managed.

- 3.2 6703 properties were consulted, and 930 responses were received, representing a 13.5% response rate. This included:
- 638 (69%) from the TED zone
 - 262 (28%) from the TGED zone
 - 30 (3%) with no address

- 3.3 In response to the following question, “what sort of parking controls would you prefer?”

Proposed Tottenham East CPZ area

- 240 (72%) wanted event day controls only
- 81 (28%) wanted full time CPZ controls

Proposed Tottenham West CPZ area

- 206 (65%) wanted event day controls only
- 111 (35%) wanted full time CPZ controls

Proposed Tower Gardens Estate CPZ area

- 193 (74%) wanted event day controls only
- 69 (26%) wanted full time CPZ controls

During the consultation, the council received a petition from local residents with 151 signatures. The petition stated ‘We the undersigned object to any changes to the current CPZ operational times, days and charges. We believe that the current CPZ is functional and does not cause most residents any issues. We

know that plans to change the CPZ are a money-making scheme by Haringey Council.'

- 3.4 Of the 151 people who signed the petition 23 residents also responded to the consultation. All 23 expressed a desire to have event day controls only.
- 3.5 The full consultation results, which includes a road by road break down of responses and preferences is attached in **Appendix 2**.

4.0 Chief Finance Officer Comments

- 4.1 Provision for the implementation of the proposed measures to the CPZ is made in the Parking Plan capital budget for 2021/2022
- 4.2 Associated costs which includes community engagement, inventory of existing site conditions, design and implementation will be met from existing agreed Parking Plan capital budget for 2021/2022 s.
- 4.3 Annual running costs will be managed within existing agreed staffing arrangements and budgets.
- 4.4 Parking controls will be enforced by existing agreed in-house civil enforcement officers (CEOs). The income from permits and parking control notices has been taken into consideration in setting the annual revenue budget.

5.0 Legal Requirements

- 5.1 Before reaching a decision to make the necessary Traffic Management Order to implement or amend a CPZ scheme, the Council must follow the statutory consultation procedures pursuant to the Road Traffic Regulation Act 1984 (as amended) ("RTRA") and the Local Authorities' Traffic Orders (Procedure)(England and Wales) Regulations 1996 (as amended) ("the Regulations"). All representations received must be properly considered in the light of administrative law principles, Human Rights law and the relevant statutory powers.
- 5.2 The Council's powers to make Traffic Management Orders arise mainly under sections 6, 9, 45, 46, 122 and 124 and schedules 1 paragraphs 1-22 the RTRA
- 5.3 The power of a local authority to make an order regulating or controlling vehicular and other traffic is contained within the ambit of section 6(2) of the RTRA.
- 5.4 When determining what paying parking places are to be designated on the highway, section 45(3) requires the Council to consider both the interests of traffic and those of the owners and occupiers of adjoining properties. In particular, the Council must have regard to: (a) the need for maintaining the free movement of traffic, (b) the need for maintaining reasonable access to premises, and (c) the extent to which off-street parking is available in the neighbourhood or if the provision of such parking is likely to be encouraged by designating paying parking places on the highway

- 5.5 By virtue of section 122, the Council must exercise its powers under the RTRA 1984 so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. These powers must be exercised so far as practicable having regard to the following matters: -
- The desirability of securing and maintaining reasonable access to premises.
 - The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
 - The national air quality strategy.
 - Facilitating the passage of public service vehicles and securing the safety and convenience of their passengers.

6.0 Comment of the Head of Legal Services

- 6.1 Other than the requirements set out in section 7 above there are no other legal implications arising out of this report.

7.0 Equal Opportunities

- 7.1 During the consultation any interested parties are permitted to make representations regardless of the their protected characteristics under the Equality Act 2010.
- 7.2 The Council must, when carrying out the Council's functions (which includes making decisions), have due regard to the needs set out in section 149 of the Equality Act 2010 (the Public Sector Equality Duty ('PSED')). This duty includes having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic (including people with a disability) and persons who do not share it. The Council must consider the duty, which is personal to decision makers.

8.0 Summary

- 8.1 From the responses received, the majority of stakeholders expressed a preference for not introducing all day CPZ controls. In analysing the consultation results on a road by road basis, some roads responded in favour of all day CPZ controls being introduced. On further analysis of these roads, the majority are situated in close proximity to neighbouring CPZ's that currently have all day CPZ controls.
- 8.2 A briefing note was prepared for Ward Councillors detailing the consultation results which also included recommendations as items for discussion. On

circulating the briefing note, a meeting was organised with ward councillors which took place on Friday 23 October 2020.

- 8.3 At the time of the meeting, the majority of the Councillors in attendance expressed a preference to not proceed with the introduction of all day parking controls, or changing the existing event day controls given the majority of stakeholders responding preferred the retention of existing Event Day Controls.
- 8.4 Following this meeting, Northumberland Park ward councillors voiced their support for full time CPZ controls to be introduced within a small area of their ward where residents had indicated support for all day CPZ controls.
- 8.5 The consultation results from this small group of roads showed from those responding, 54% were in favour of all day CPZ controls being introduced, with a majority preferring operational times Monday to Friday, 8am to 8pm. The roads affected by the request are listed below:
 - Academia Road
 - Bradford Close
 - Castleford Close
 - College Park Road
 - College Road
 - Commercial Road
 - Durban Road
 - Hebden Terrace
 - Pretoria Road
 - Princess Street
 - Queen Street
 - White Hart Lane

- 8.6 In addition to the establishment of a new CPZ area, Northumberland Park ward councillors requested Bromley Road be included in the Tottenham North CPZ. The majority (70%) of those responding from this road 'supported all day CPZ controls being introduced. Bromley Road is located adjacent to the south eastern boundary of Tottenham North CPZ, which operates Monday to Saturday, 8am to 6.30pm along with Event Day controls, Monday to Saturday 8am to 8.30pm and Sunday & Public Holidays Noon to 8pm

- 8.7 The proposed CPZ boundaries along with consultation responses were detailed on plans and sent to Northumberland Park councillors for comments. Councillors approved the plans and asked for this to be progressed to Statutory Consultation. Plans of the proposed CPZ areas have been attached in **Appendix 3**.

9.0 Recommendations

- 9.1 It is recommended that the Cabinet Member for Transformation and Public Realm Investment and the Head of Highways and Parking approve the changes to parking controls as set out below subject to the outcome of a statutory consultation and detailed design:

1. Introduce parking controls in Academia Road, Bradford Close, Castleford Close, College Park Road, College Road, Commercial Road, Durban Road, Hebden Terrace, Pretoria Road, Princess Street, Queen Street and White Hart Lane (partial).

The new CPZ will operate Monday to Friday, 8am to 8pm and Event Days Monday to Friday 5pm to 8.30pm, and Saturday, Sunday and Public Holidays 12 noon to 8pm. The new controlled parking zone is to be called Tottenham West (THW).

2. Include Bromley Road in the existing Tottenham North CPZ and adopt the operational times of Monday to Saturday, 8am to 6.30pm and Event Days Monday to Saturday 8am to 8.30pm, and Sunday and Public Holidays 12 noon to 8pm.
 3. No action further action is taken at this time for the roads in the Tottenham Event Day and Tower Gardens Event Day CPZ areas that fall outside the proposed THW CPZ area and Bromley Road.
- 9.2 Stakeholders in those roads whose preference was to retain existing Event Day controls, be notified of the results of the consultation and that the council will be taking no further action in their roads at this time.

List of Appendices

1. Public consultation letter and questionnaire .
2. Public consultation summary report.
3. CPZ boundary plans for Northumberland Park West and Tottenham North CPZ extension.

Appendix 1

Consultation letter and questionnaire

21 February 2020



Public consultation on parking controls

Tottenham Event Day (TED) and Tower Gardens Event Day (TGED)

Dear Resident or Business,

Following our parking consultations with you last year, residents and businesses reported that parking behaviours have changed. For example, the completion of residential developments, the new Tottenham Hotspur Football Club stadium and the introduction of parking controls in the surrounding area.

In response to this feedback, and to ensure that the council delivers parking measures that meet the needs of the community, we are reconsulting with residents and businesses to determine if parking controls are still supported, and if so what operating days and times are preferred.

As part of our consultations last year we said that we would simplify the event day times to operate between 8am to 11pm on event days. This proposal will remain unchanged and will not form part of this consultation. These operational times are designed to help protect parking for the local community during the planned sporting and music events that are held at the stadium. It will also enable the council to provide effective enforcement during these events, particularly within our hotspot areas.

Have your say

We would like to know if you are in favour of having a Controlled Parking Zone introduced, and if so what days and times you prefer. We would also like to hear of any safety issues that could be affecting your community.

Encouraging more people to cycle is a vital part of our plan to tackle congestion, improve air quality, promote physical activity and improve accessibility. As the number of people who cycle increases, we recognise the need for safe and secure parking. As part of this exercise we are asking residents if they support the installation of cycle storage facilities in your road. This information will help us establish areas of demand and develop future programmes.

As part of the council's action plan to promote and encourage the uptake of Electric Vehicles, we are considering further locations to increase the number of Electric Vehicles charging points/bays available in the borough. If you would like to request

an on-street charging point or suggest a location to be considered, then please provide details within the comments section of the questionnaire.

Details of how Controlled Parking Zones operate, along with their advantages and disadvantages is set out overleaf. Full information is also available on the council's website with links to the current permit price information:

www.haringey.gov.uk/parking/cpz.

Residents in car free developments will be aware that they will not be eligible to apply for permits to park within Controlled Parking Zones. This is a London wide Mayoral planning policy to encourage the uptake of sustainable modes of travel such as walking, cycling and the use of local transport.

Homes for Haringey residents are eligible to apply for parking permits but will not have parking restrictions installed on estate areas or roads that are managed by Homes for Haringey.

Please tell us what you think by completing the attached questionnaire and returning it to us in the Freepost envelope provided. If you prefer, the questionnaire can be completed online at www.haringey.gov.uk/current-parking-consultations.

Please send us your completed questionnaire no later than **16 March 2020**.

What Happens Next?

Council Officers will analyse and discuss the outcome of the consultation with your ward councilors. We will update residents and businesses of the outcome and next steps with the results of the consultation published on the council's website.

If you have questions about the consultation, please email us at
frontline.consultation@haringey.gov.uk

With thanks for your attention, we look forward to hearing from you.

Yours faithfully



Operations: Traffic Management

Operations: Traffic Management
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020 8489 1000

www.haringey.gov.uk

Tottenham Parking Questionnaire

Q1 Please tell us your road name and house number. (Personal details will not be published, but we need the information for our analysis)

Q2 Are you responding as a resident or business?

Resident

Business

Q3 Is it difficult to park in your road?

Yes

No

Sometimes

Q4 What sort of parking controls would you prefer?

Event / match day-only controls

Event day and weekday controls

Q5 If you think 'full time' CPZ controls are needed as well as event days, which days do you think they should operate?

Mon - Fri

Mon - Sat

Mon - Sun

Q6 If the CPZ was 'full time' what operating hours do you think it should have?

2 hours 10am - 12noon

5 hours 11am - 4pm

2 hours 12noon - 2pm

All day e.g 8am to 6.30pm

4 hours 10am - 2pm

All day and evenings e.g to 8pm

Q7 Which (if any) of these parking problems affect your road? Tick those that apply

Commuter parking

Tottenham Stadium visitors

Overspill from nearby CPZs

Trade vans, campers

Shop or business staff, customers

Other non-local vehicles

Multicar households

None of these problems

Use of bins to reserve space

Q8 Would you like an electric vehicle charging point (EVCP) outside your house?

Yes

No

Q9 Would you like a 'Bikehangar' cycle storage facility in your road?

Yes

No

Q10 **Some roads have 'Pay by Phone' (pay to park) bays installed to help with visitors.
Does your road need any (or more) Pay by Phone bays?**

Yes

No

Q11 **Please use this space for any comments (including preferred operating times)**

Thank you for completing the questionnaire. Please return it to us using the Freepost envelope

**Frontline Consultation, London Borough of Haringey
Level 1S, River Park House, 225 High Road N22 8HQ**

Appendix 2

Summary Report of Consultation

TED TGED. Public Consultation on Parking Controls

Consultation Report: 3 April 2020

Analysis

1. Overview of type of controls residents would prefer

		Count	%
Prefer:	Match days only	636	70%
	'Full time' CPZ	269	30%
	Total	905	100%

1a. Overview - by sub zone:

Percentages read across>

		Prefer:			
		Match days only		'Full time' CPZ	
		Count	Row %	Count	Row %
Sector within TED	West	205	71%	82	29%
	East	207	65%	110	35%
	Tower Gdns	201	74%	69	26%
	No ID	23	74%	8	26%
	Total	636	70%	269	30%

Preferred Controls – by roads within the sub zones

2a. TED West (Tottenham Cemetery surrounds)

		Prefer:			
		Match days only		'Full time' CPZ	
		Count	Row %	Count	Row %
TED (West)	Acacia Ave -20	1	100%	0	0%
	Academia Way-110	8	80%	2	20%
	All Hallows Rd-15	1	25%	3	75%
	Allington Ave -70	7	100%	0	0%
	Gt Cambridge Rd	6	86%	1	14%
	Barkham Rd - 40	3	100%	0	0%
	Bradford Cl-30	0	0%	1	100%
	Beaufoy Rd-110	12	80%	3	20%
	Bedwell Rd-50	2	67%	1	33%
	Cavell: Roseland Cl-20	0	0%	5	100%
	Durban Rd-101	6	32%	13	68%
	Cavell Rd-75	6	50%	6	50%
	Cedar Rd-30	0	0%	0	0%
	Church Rd & Prospect Pl-100	12	71%	5	29%
	Creighton Rd -200	14	82%	3	18%
	Roundway The	20	71%	8	29%
	Devonshire Hill La 80	6	75%	2	25%
	Flexmere Rd-130	10	91%	1	9%
	Fryatt Rd-30	4	100%	0	0%
	Henningham Rd N -170	5	100%	0	0%
	Jellicoe Rd -50	2	67%	1	33%
	Nursery St-55	10	77%	3	23%
	Marshall Rd -60	10	100%	0	0%
	Oak Ave -25	8	89%	1	11%
	Pretoria Rd -75	3	75%	1	25%
	Queen St-50	8	40%	12	60%
	Selby Rd-50	11	100%	0	0%
	Warkworth Rd -50	2	100%	0	0%
	Weir Hall Rd-150	12	100%	0	0%
	White Hart Lane -100	14	61%	9	39%
	Tenterden Rd	2	67%	1	33%
Total		205	71%	82	29%

2b TED East

		Prefer:			
		Match days only		'Full time' CPZ	
		Count	Row %	Count	Row %
TED (East)	Almond Rd -25	4	100%	0	0%
	Argyle Rd -40	1	17%	5	83%
	Asplins Rd -120	14	88%	2	13%
	Baronet Rd +Grove -95	6	86%	1	14%
	Blaydon Cl -100	3	100%	0	0%
	Brantwood Rd -100	4	100%	0	0%
	Bromley Rd -80	4	33%	8	67%
	Chalgrove Rd -70	6	100%	0	0%
	Denmark St -30	1	100%	0	0%
	Farningham Rd -40	2	100%	0	0%
	Foyle Rd -70	9	64%	5	36%
	Garman Rd	2	100%	0	0%
	Hampden La -110	4	80%	1	20%
	Hampden Rd -40	6	46%	7	54%
	Haynes Cl -90	3	75%	1	25%
	Heybourne Rd -40	1	50%	1	50%
	Lansdowne Rd -225	23	74%	8	26%
	Manor Rd -140	15	75%	5	25%
	Campbell Rd -100	10	59%	7	41%
	Nthumbld Grove -50	3	75%	1	25%
	Nthumbld Park -200	14	58%	10	42%
	Park Lane E -75	18	78%	5	22%
	St Pauls Rd -135	8	89%	1	11%
	Sutherland Rd -45	6	67%	3	33%
	Tariff Rd	2	67%	1	33%
	Vicarage Rd -90	6	86%	1	14%
	West Rd -15	3	60%	2	40%
	Willoughby La -200	7	50%	7	50%
	Willoughby Park Rd -115	1	8%	11	92%
	Commonwealth Rd -40	4	50%	4	50%
	Trulock Rd -60	0	0%	3	100%
	Shelbourne Rd -300	13	68%	6	32%
	Waverley Rd -160	5	56%	4	44%
	Not stated	1	100%	0	0%
	Total	209	66%	110	34%

2c TGED. Tower Gardens Event Day (Excludes TG)

		Prefer:			
		Match days only		'Full time' CPZ	
		Count	Row %	Count	Row %
Tower Gdns ED	Awlfield Ave -34	6	75%	2	25%
	Balliol Rd -30	5	63%	3	38%
	Bennington Rd -35	1	33%	2	67%
	Cumberton Rd -35	5	100%	0	0%
	De Quincey Rd -70	11	79%	3	21%
	Deyncourt Rd -25	6	100%	0	0%
	Gedeney Rd -75	11	92%	1	8%
	Gospatrick Rd -60	10	63%	6	38%
	Henningham Rd	8	100%	0	0%
	Kevelioc Rd -40	4	50%	4	50%
	Lordship Lane -100	28	85%	5	15%
	Risley Ave -150	30	71%	12	29%
	Shobden Rd -40	10	100%	0	0%
	Siward Rd -45	4	50%	4	50%
	Smithson Rd -20	5	83%	1	17%
	Spigurnell Rd -45	0	0%	3	100%
	Tower Gdns Rd -80	29	74%	10	26%
	The Roundway -50	7	58%	5	42%
	Waltheof Ave -20	5	71%	2	29%
	Waltheof Gdns -60	10	91%	1	9%
	Morteyne Rd -30	3	50%	3	50%
	Walden Rd -10	3	60%	2	40%
Total		201	74%	69	26%

3a. Causes of Parking Problems

Causes of parking difficulty		Count	%
	No problems	366	41%
	Other non-local	256	29%
	Spurs stadium visitors	253	28%
	Trade vans, campers	226	25%
	Commuters	186	21%
	Multicar households	180	20%
	Displacement from CPZs	155	17%
	Business staff / customers	129	14%
	Using bins to reserve spaces	109	12%
	Total	894	100%

3b. Suggested Causes of Parking Problems – by sub zone

	Sector within TED							
	West		East		Tower Gdns		No ID	
	Count	Row %	Count	Row %	Count	Row %	Count	Row %
No problems	122	33%	101	28%	127	35%	16	4%
Other non-local	79	31%	98	38%	71	28%	8	3%
Spurs stadium visitors	86	34%	102	40%	57	23%	8	3%
Trade vans, campers	67	30%	81	36%	72	32%	6	3%
Commuters	61	33%	72	39%	49	26%	4	2%
Multicar households	68	38%	61	34%	47	26%	4	2%
Displacement from CPZs	56	36%	47	30%	46	30%	6	4%
Business staff / customers	37	29%	59	46%	33	26%	0	0%
Using bins to reserve spaces	27	25%	50	46%	29	27%	3	3%
Total	286	32%	309	35%	269	30%	30	3%

TED East is most affected by parking congestion, with many residents commenting that congestion is not helped by the event day controls.

If full time, what operating days should apply?

		If full time, what days?					
		Mon - Fri		Mon - Sat		All week	
		Count	Row %	Count	Row %	Count	Row %
Sector within TED	West	35	34%	16	16%	51	50%
	East	50	38%	29	22%	54	41%
	Tower Gdns	25	32%	18	23%	36	46%
	No ID	3	25%	2	17%	7	58%

If full time, what operating hours should apply?

	Sector within TED									
	West		East		Tower Gdns		No ID		Total	
	Count	%	Count	%	Count	%	Count	%	Count	%
10am-12noon	14	12%	16	11%	10	11%	1	8%	41	11%
12noon - 2pm	5	4%	11	7%	6	7%	0	0%	22	6%
4 hrs: 10am-2pm	7	6%	16	11%	9	10%	0	0%	32	9%
5 hrs 11am-4pm	9	8%	11	7%	5	5%	0	0%	25	7%
All day: 8am-6.30pm	31	27%	35	24%	25	27%	6	50%	97	27%
All day & evenings to 8pm	48	42%	59	40%	36	40%	5	42%	148	41%

4. Are more 'PayByPhone' bays wanted?

		'Pay-by-phone' bays?			
		Yes		No	
		Count	Row %	Count	Row %
Sector within TED	West	51	18%	236	82%
	East	66	21%	251	79%
	Tower Gdns	53	20%	217	80%
	No ID	8	26%	23	74%
	Total	178	20%	727	80%

5. Bikehangars wanted?

		Bikehangar?			
		Yes		No	
		Count	Row %	Count	Row %
Sector within TED	West	60	21%	227	79%
	East	61	19%	255	81%
	Tower Gdns	67	25%	203	75%
	No ID	5	16%	26	84%
	Total	193	21%	711	79%

6. Electric Vehicle Charging Points wanted?

		EVCP?			
		Yes		No	
		Count	Row %	Count	Row %
Sector within TED	West	58	20%	229	80%
	East	64	20%	253	80%
	Tower Gdns	51	19%	218	81%
	No ID	4	13%	27	87%
	Total	177	20%	727	80%

Appendix 3

Proposed CPZ areas





