

**Report for:** Cabinet 7 December 2021

**Title:** Implementation of Bruce Grove West Green Low Traffic Neighbourhood

**Report**

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

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

**Ward(s) affected:** Bruce Grove, West Green

**Report for Key/**

**Non-Key Decision:** Key

**1. Describe the issue under consideration**

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

**2. Cabinet Member Introduction**

2.1 Haringey is embarking on a programme of implementing Low Traffic Neighbourhoods (LTNs) to deliver the objectives set out in the adopted 2018 Transport Strategy and the public consultation draft of the Haringey Walking and Cycling Action Plan (2021) and as part of our ambitious Streets for People initiative. LTNs are needed across the borough to 1) reduce pollution, especially 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.

- 2.2 In contrast to many other London boroughs that implemented LTNs in 2020 with limited public engagement and consultation ahead of implementation, Haringey has undertaken significant engagement and consultation on the proposed Bruce Grove West Green LTN. Over the past year, the Council has carried out three separate engagements on the proposed Bruce Grove West Green LTN and numerous additional engagements with key stakeholders. We have listened to feedback and comments, sought to address the key concerns raised, and the ideas and opinions shared have been fed into the design of the Bruce Grove West Green LTN. A key change has been the extension of the proposed Bruce Grove West Green LTN area further westwards in response to early community feedback.
- 2.3 The Council has considered all feedback to the public consultation on the proposed Bruce Grove West Green LTN (Stage 3 Engagement) and associated complementary measures. While there was overall support for reducing the traffic within the Bruce Grove West Green LTN area, it is noted that there was an overall negative response to the proposed changes in each of the two areas within the Bruce Grove West Green LTN. These 'headline results' conceal a range of views about the proposed Bruce Grove West Green LTN. In some cases, negative responses reflected 'in-principle' objections of individuals to the implementation of the Bruce Grove West Green LTN but in other cases negative responses reflected particular concerns about the effects of the proposed LTN (e.g. displacement of traffic) or detailed design matters (e.g. the type and locations of filters). There are a range of ways in which the Council will mitigate the key concerns expressed, including making post-consultation changes to the proposed Bruce Grove West Green LTN, making Blue Badge holders who live in the LTN or on its boundary roads eligible for exemptions to some of the LTN filters, comprehensive monitoring while the experimental scheme is in force and continued engagement with the local community and other key stakeholders and communities. During the trial, we will keep channels of communication open for residents and the wider community to feedback their experience. By taking a phased implementation of delivering the School Streets, pedestrian crossing facilities and bike hangars first and monitoring the impact of these, potential traffic displacement mitigation measures can be better identified and deployed, in conjunction with any changes within the Bruce Grove West Green LTN, if necessary.
- 2.4 The Bruce Grove West Green LTN will be a key driver towards a safer, cleaner, greener, fairer and happier borough and I am therefore recommending that the scheme and associated complementary measures are taken forward on a trial basis. The Bruce Grove West Green LTN will remove through-traffic from the LTN area, reclaiming local streets for the people who live there, making them once more community spaces where people meet, chat, socialise and where children play. Together with the proposed complementary measures, it will improve the walkability and cyclability of the local area, creating safe, active travel corridors

between local amenities including shops, schools, surgeries, parks, and leisure facilities.

### **3. Recommendations**

That Cabinet:

- A) Notes the responses received to the proposed Bruce Grove West Green Low Traffic Neighbourhood (LTN) as part of Engagement Stage 1 (Early Engagement), Engagement Stage 2 (Community Design Workshops) and Engagement Stage 3 (Public Consultation) as set out in Appendices E and K;
- B) Approves the making of an experimental traffic management order to implement the Bruce Grove West Green LTN experimental scheme, as set out on the plan in Appendix L, subject to funding, and provided that any changes to the plan in Appendix L are reported back to the Leader, Cabinet or an individual Cabinet member for approval before being implemented;
- C) Approves the making of an experimental traffic management order to implement the School Streets, as set out on the plan in Appendix L, subject to compliance with relevant statutory requirements and detailed engineering drawings to implement the traffic control measures show on the plan;
- D) Approves the bike hangars, as set out on the plan in Appendix L, subject to compliance with relevant statutory requirements and detailed engineering drawings;
- E) Approves the pedestrian crossings, as set out on the plan in Appendix L, subject to compliance with relevant statutory requirements and detailed engineering drawings;
- F) In relation to the LTN only, approve the exemption of:
  - a. Blue Badge holders living within the LTN or on its immediate boundary;
  - b. Special Educational Needs and Disabilities (SEND) transport; and
  - c. Essential Haringey Council services catering for people with a disabilityto non-hard closure filters in the Bruce Grove West Green LTN experimental scheme, as per paragraph 6.80 of this report.
- G) Delegates approval to the Director of Environment & Neighbourhoods to agree the engineering drawings for the experimental traffic management

orders for the Bruce Grove West Green LTN and School Streets and the engineering drawings for the bike hangars and pedestrian crossings, set out in recommendations B to E, provided any changes to the Plan in Appendix L do not need to be reported back to the Leader, Cabinet or an individual Cabinet member as a key decision;

- H) Authorises the Director of Environment & Neighbourhoods, in consultation with the Cabinet Member for Environment, Transport and the Climate Emergency, to modify or suspend the operation of the experimental traffic management orders for the Bruce Grove West Green LTN and/or School Streets if it appears to the Director essential in the interests of the expeditious, convenient and safe movement of traffic or for providing suitable and adequate on-street parking facilities, or for preserving or improving the amenities of the area through which any road affected by the order runs provided any decision to modify or suspend does not need to be reported back to the Leader, Cabinet or an individual Cabinet member as a key decision.

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

- 4.1 The proposed Bruce Grove West Green LTN has been developed over 10 months informed by a significant amount of engagement with local residents and other key stakeholders. In early 2021, the Council began early engagement with residents and businesses on the proposed Bruce Grove LTN. The most common issues raised by respondents were 'traffic speeding', 'traffic volume' and 'rat-running traffic.' The most common suggested improvements from respondents were 'reduce traffic volume', 'reduce traffic speeds' and 'increase traffic and speeding enforcement'. Having regard to strong feedback received that the proposed Bruce Grove LTN should be extended westwards to include the area between Belmont Road/Downhills Way, West Green Road and Westbury Avenue, the Council began to work up an expanded proposal for a Bruce Grove West Green LTN. A series of Bruce Grove West Green LTN design proposals were subsequently developed to help address the concerns raised. Engagement was carried out on these in May 2021 via online Community Design Workshops.
- 4.2 From 16 August 2021 to Friday 17 September 2021, a public consultation was held on the preferred design options. There was an overall positive response to the Council proposing to reduce motor vehicle traffic in the Bruce Grove West Green LTN but, when people were asked how they felt about the proposed changes in each of the two areas within the proposed Bruce Grove West Green LTN, there was an overall negative response. While some people opposed the principle of the proposed scheme, many supported the principles behind the Bruce Grove West Green LTN but had concerns about the Council's specific approach. In response to specific concerns raised, the Council has made a number of post-consultation changes to the proposed Bruce Grove West Green

LTN as well as proposed a number of exemptions to the traffic restrictions. Other key concerns of those opposing the Bruce Grove West Green LTN are noted, particularly increased traffic on main roads, followed by concerns around increased car journey times and increased air pollution on main roads, including near schools. However, by taking a phased implementation of delivering the School Streets, pedestrian crossing facilities and bike hangars first and monitoring the impact of these, potential traffic displacement mitigation measures can be better identified and deployed, in conjunction with any changes within the Bruce Grove West Green LTN. It is also the case that people without access to a car were underrepresented within respondents. Such people were found to be much more positive about the Bruce Grove West Green LTN than those who own or have access to a car.

- 4.3 Introducing the Bruce Grove West Green LTN is expected to result in the adjustment of motor vehicle travel behaviour of both those living within the LTN and those living outside. Some drivers will adjust routes and behaviour to avoid the Bruce Grove West Green LTN area, switch to walking, cycling or public transport or even reduce the number of journeys. The proposed Bruce Grove West Green LTN will contribute to reducing through-traffic in the area; it will also help encourage residents who currently make trips by motor vehicle to switch some local journeys to more sustainable travel modes. A substantial proportion of locally-generated motor vehicle trips (i.e. by Haringey residents) are short. TfL data indicates that over 60% of such trips (accounting for those that are essential/cannot be made by other means, e.g. due to a physical or other disability) could be made by cleaner, more sustainable modes. By making some local motor vehicle trips slightly less attractive (e.g. slightly longer due to restrictions in certain places) and walking/cycling much more attractive (by reducing dominance of vehicle traffic on these streets), a switch from the former to the latter will be encouraged.
- 4.4 Transport is the third largest source of emissions in the borough yet less than half of Haringey households have access to a car or van and this figure is falling. Census data from 2011 shows that household access across the area to cars or vans is low. 59% of households in Bruce Grove ward and 57% of households in West Green ward do not have access to a car or van. This means that the majority of households in the area do not benefit from the large amount of space on the public highway which currently enables rat-running.
- 4.5 A range of assessments have been carried out to understand the potential impacts of the proposed Bruce Grove West Green LTN. The Equalities Impact Assessment (EqIA) showed that the measures are likely to advance equalities for many protected groups, albeit with a small disadvantage noted for those solely reliant on motor vehicles for transport. On balance, the scheme is considered to promote equality of opportunity among protected groups.

- 4.6 Under the Traffic Management Act 2004, Haringey Council has a ‘network management duty’ under section 16 in its capacity as local traffic authority. In simple terms the duty is to secure “the expeditious movement of traffic including pedestrians on the authority’s road network”.
- 4.7 A high-level transport assessment was prepared for the Bruce Grove West Green LTN which predicted a reduction in motorised vehicular traffic within the proposed Bruce Grove West Green LTN and a range of a range of potential negative impacts on motorised vehicular traffic on certain parts of the boundary roads and at certain times (from a 0-50% increase to a 100%+ increase). However, it should be noted this is only a prediction and was based on the worst-case assumption that all motorised vehicular traffic reassigns to the nearest available route and assumed that the boundary roads are able to accommodate additional motorised vehicular traffic. There are varying levels of spare capacity in those boundary roads. Early reviews by Sustrans of 6 trial LTNs across London have shown a general reduction in traffic over time within the LTNs with a mixed picture for the boundary roads. It is only possible to accurately understand impacts of the proposals on the highway network once the scheme is in place. The scheme is proposed to be implemented on a trial basis supported by a comprehensive monitoring programme covering traffic flows and pedestrian flows, bus journey times, emergency response times, and air quality. It should be noted that ‘traffic’ includes motorised and non-motorised travel modes and it is considered that the Council would not be in breach of its network management duty in implementing the Bruce Grove West LTN, provided that it is phased appropriately including having regard to other LTNs proposed to be taken forward by the Council (Bounds Green and St Ann’s) and considering possible mitigation measures to counter the extent of negative impact on its boundary roads.
- 4.8 The Department for Transport’s statutory guidance on the Traffic Management Act 2004: network management to support recovery from COVID-19 (last updated 30 July 2021) sets out that, following the pandemic, local authorities are expected to continue to reallocate road space to people walking and cycling including through measures such as modal filters which can create low-traffic or traffic-free neighbourhoods.

## 5. Alternative Options Considered

- 5.1 The alternative options available to the Council are:

Option 1: Implement an alternate design for the Bruce Grove West Green LTN. The original design for the LTN excluded the area bounded by Belmont Road/Downhills Way, West Green Road and Westbury Avenue. Proceeding with the original option is rejected because it does not take account of strong community feedback at Engagement Stage 1 (early engagement) to include this area with the proposed Bruce Grove West Green LTN

Option 2: Implement the Bruce Grove West Green LTN in a geographically-phased way – i.e. segmenting the area into discrete parts. Although this would enable the funding currently available to be used to implement full LTN measures in one or more parts of the LTN (e.g. the West Green element, a western section of Bruce Grove – say, Belmont Road/Downhills Way to Mount Pleasant Road - and an eastern section of Bruce Grove – say, Mount Pleasant Road to Bruce Grove/High Road), the effect would merely be to temporarily displace rat-running through-traffic to slightly fewer roads within the overall Bruce Grove West Green LTN and therefore exacerbate the problems currently experienced on those roads, particularly by their residents. However, the selection of which parts to proceed with and which ones should be deferred until sufficient funding was available would be arbitrary and, for the most part, would represent a slight variation of Option 1 in terms of timing and coverage. Furthermore, additional cost would be incurred in creating any such discrete parts, delaying the rate at which the full Bruce Grove West Green LTN could be created.

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

## **6. Background**

### **Strategic context**

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

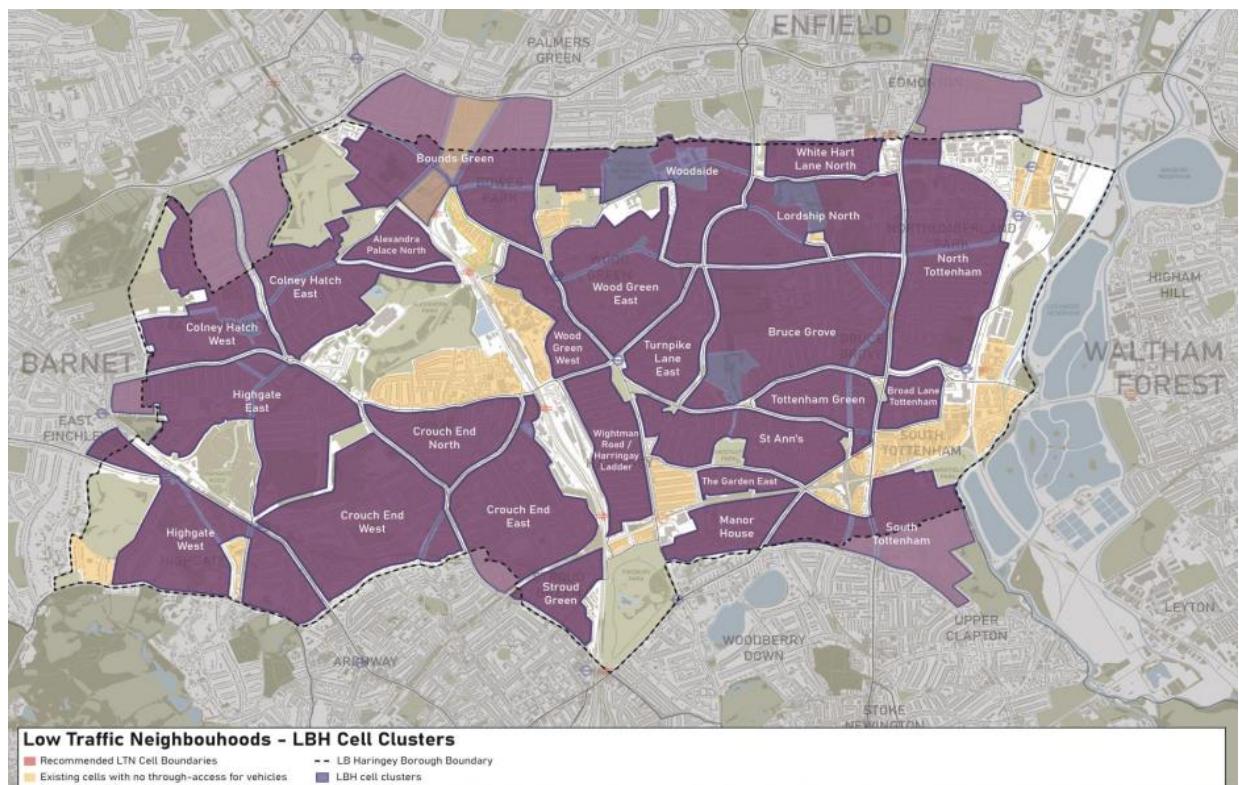
### **Low Traffic Neighbourhoods**

- 6.3 Low Traffic Neighbourhoods (LTNs) are area-based traffic management schemes that aim to reduce or remove non-residential motor traffic from residential areas, as well as reduce the number of short trips made by vehicles which could be walked or cycled. A range of measures are usually introduced as part of LTNs which work together to make it more difficult for motor traffic to travel through an area meaning it is only trips originating from local addresses or

delivery and service vehicles that can be made. Measures that are normally introduced in LTNs include one-way streets, banned turns and features called modal filters where roads are closed to motor traffic (at one end or in the middle) removing the ability of non-local traffic to drive along a street. Modal filters can be either be in the form of physical barriers or roads left open for access by permitted vehicles such as emergency services which in some cases are enforced via CCTV.

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

Figure 1: Potential Low Traffic Neighbourhoods



- 6.5 Bruce Grove and Turnpike Lane East are included as two of 25 potential LTN locations in the draft WCAP (together these make up the Bruce Grove West Green LTN). An LTN in this location is consistent with the ten criteria listed in the document for defining and determining locations for LTNs. These include potential for more walking and cycling, safe access to schools and community engagement.

## Issues

- 6.6 Over past decades, there has been a significant increase in traffic volumes on residential streets, resulting in greater noise, air pollution and road danger. This has been made worse by the introduction of sat nav apps which lead increasingly to more traffic passing through residential areas. At the same time, car ownership across London has been falling. The 2011 Census indicated only 48% of households in Haringey had access to a car or van. A Centre for London report<sup>1</sup> published in 2020 indicated that figure has now fallen to 43%. A large portion of traffic on Haringey's residential roads is from vehicles which have not originated from or are not destined for the borough.
- 6.7 LTNs are a key tool available to councils to help reduce traffic volumes not only on residential streets but across their areas more generally. While LTNs are a traffic intervention, their potential benefits primarily relate to public health. Where LTNs are implemented successfully and remove traffic, they can deliver improved air quality, provide for cleaner, healthier, safer and more pleasant routes to schools and other destinations, enable streets to be reclaimed for play and community interaction and, in so doing, support increased physical activity and improve health and wellbeing.
- 6.8 During the height of the Covid-19 lockdown, London witnessed how creating more space to walk and cycle can reduce traffic and improve air quality. Traffic on streets reduced dramatically and, in turn, London's toxic air pollution improved in many areas<sup>2</sup>. Less traffic on our streets created safer, quieter streets and improved the experience for walking and cycling.
- 6.9 The major effect of introducing an LTN is that it alters vehicle travel behaviour. In particular, LTNs are a key tool to eliminate through-traffic (i.e. traffic that does not have an origin or destination within the LTN). The implementation of an LTN requires drivers who would ordinarily travel through the LTN to adjust their behaviour, either by taking an alternative route, switching to walking, cycling or public transport or even reducing the number of their journeys. LTNs can also require drivers living within the LTN area to alter their travel behaviour. While every home in a LTN can be accessed by car and can receive deliveries to their doors, it is the case that some residents and business visitors may have to drive further or use a different road to access their address.

#### Traffic reduction versus traffic displacement

- 6.10 A key point of contention is whether LTNs lead to an overall reduction in traffic (i.e. 'traffic reduction') or whether they just displace it from one location to

---

<sup>1</sup> [Centre for London Future of parking.pdf \(centreforlondon.org\)](https://centreforlondon.org)

<sup>2</sup> [https://www.london.gov.uk/sites/default/files/london\\_assembly\\_environment\\_committee\\_-\\_air\\_quality\\_report\\_-\\_february\\_2021.pdf](https://www.london.gov.uk/sites/default/files/london_assembly_environment_committee_-_air_quality_report_-_february_2021.pdf)

another. It is impossible to predict how people will change their travel behaviour as a result of an LTN. However, evidence from other schemes in London shows that the changes in traffic volumes on boundary roads are very different to what would be predicted by simple reassignment of traffic. A paper<sup>3</sup> examining over 70 case studies of road space reallocation from eleven countries, and the collation of opinions from over 200 transport professionals worldwide, found that predictions of traffic problems are often unnecessarily alarmist, and that, given appropriate local circumstances, significant reductions in overall traffic levels can occur, with people making a far wider range of behavioural responses than has traditionally been assumed.

- 6.11 A particular concern is around traffic being displaced from the quieter residential areas onto surrounding main roads (often bounding the LTN) which could also be residential and may already be very congested. An analysis in Waltham Forest<sup>4</sup> found that, although traffic on major roads adjacent to LTNs increased slightly, it increased less than traffic in London as a whole during this period. Traffic decreased by 56% over the whole (both inside and outside the LTN) with 10,000 fewer vehicles a day across the project area. A study<sup>5</sup> by Kings College on Waltham Forest in 2019 found that air quality did not get worse on major roads (or other non-LTN areas) after the introduction of LTNs. A related concern is that increasing traffic on boundary roads is likely to disproportionately affect more deprived residents and those with protected characteristics. A spatial analysis of London's new LTNs<sup>6</sup> has shown that, across London, people in deprived areas were much more likely to live in a new LTN than people in less deprived areas and that, at a micro-level, LTN residents were demographically similar to neighbours in immediately adjacent areas.

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

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

#### Access to properties

---

<sup>3</sup> [https://nacto.org/wp-content/uploads/2015/04/disappearing\\_traffic\\_cairns.pdf](https://nacto.org/wp-content/uploads/2015/04/disappearing_traffic_cairns.pdf)

<sup>4</sup> <https://www.enjoywalthamforest.co.uk/work-in-your-area/walthamstow-village/comparison-of-vehicle-numbers-before-and-after-the-scheme-and-during-the-trial/>

<sup>5</sup> [https://www.walthamforest.gov.uk/sites/default/files/WalthamForest\\_Kings\\_Report\\_310718.pdf](https://www.walthamforest.gov.uk/sites/default/files/WalthamForest_Kings_Report_310718.pdf)

<sup>6</sup> <https://osf.io/preprints/socarxiv/q87fu/>

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

### Businesses

- 6.14 LTNs may mean that access to certain businesses by motor vehicle is affected. This has implications for businesses who some people visit by car, those that rely on motor vehicles for deliveries, and for businesses directly related to motor vehicles such as MOT garages. Issues in this regard are partly mitigated by the fact that all businesses in an LTN are still able to be accessed by car. It is important to note that there are evidenced benefits to businesses from increased levels of walking and cycling<sup>7</sup>. People who walk and cycle more take more trips to the local high street over the course of a month. On average, pedestrians make 16 visits, cyclists 12, and car drivers 8. On average, over a month, people who walked to their local high street spent 40% more.

### Community facilities

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

### Older people and people with disabilities

- 6.16 A key issue with LTNs is that they have the potential to impact disproportionately on individuals and groups who experience barriers to walking, cycling and using public transport and who rely on a motor vehicle to get around. Specific groups who may be presented with difficulties by LTNs include older people and people with disabilities. People and groups who rely on motor vehicles may also be more affected such as those who have carers or who use transport services such as special educational needs and disabilities (SEND) transport. LTNs do not prevent anyone driving to their home or to a particular address as all addresses remain

---

<sup>7</sup> <https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>

accessible. It is also worth noting that disabled people also walk and cycle therefore their needs will differ to those who use a motor vehicle to get around.

- 6.17 Each person with disabilities has different needs and they cannot be treated as one homogeneous group. A report by Transport for All set out that the positive impacts of LTNs experienced by different people with different disabilities included: easier and more pleasant journeys, increase in independence, decrease in traffic danger and benefits to physical and mental health. The negative impacts included: longer journey times for residents and visitors, travel becoming more exhausting, complicated or difficult and some cases of a negative impact on mental health, issues with taxis and a perceived rise in traffic danger. It is crucial that the needs and requirements of these individuals and groups are properly taken into account as part of the design process of an LTN

#### Taxis & private hire

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

#### Emergency services

- 6.19 A common concern about LTNs is that they have potential to slow down emergency services, either through blocking routes within the LTN or creating greater congestion outside of it. The ability of emergency services to efficiently use the highway network is a genuine factor that must be taken into account with LTNs. It is important that emergency services are extensively consulted as proposals develop and that their vehicles are provided with necessary accesses. A common way to do this is to use camera enforced filters rather than physical barriers as filters. Data from long-standing LTNs have shown that there is no negative impact on emergency response. In Waltham Forest, Fire Brigade response times were unchanged inside LTNs, and slightly faster on boundary roads<sup>8</sup>.

---

<sup>8</sup> <https://findingspress.org/article/18198-the-impact-of-introducing-a-low-traffic-neighbourhood-on-fire-service-emergency-response-times-in-waltham-forest-london>

## Exemptions

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

## Accessibility for communities

- 6.21 The permeability and accessibility of communities can be affected by the introduction of an LTN - whilst accessibility for cars is reduced (but not removed), accessibility for pedestrians and cyclists is increased. It may be the case that vehicular access is restricted to some communities to remove harmful through-traffic which does not have an origin or destination in the local area. While this may mean some residents and visitors may have to drive further or use a different road to access the community, accessibility by public transport can be retained and enhanced through appropriate choices of filters such as bus gates. Accessibility and permeability for pedestrians and cyclists can also be significantly improved through the removal of through traffic. A study in Bristol<sup>9</sup> found the number of friends and acquaintances reported by residents was significantly lower on streets with higher volumes of motor traffic.

## Community safety

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

## **External funding**

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

---

<sup>9</sup> <https://core.ac.uk/download/pdf/323897729.pdf>

<sup>10</sup> <https://osf.io/preprints/socarxiv/ftm8d/>

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

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

Table 1: External funding secured towards delivery of LTNs

<b>Tranche</b>	<b>Funding secured</b>			<b>Deadline for committal</b>	<b>Deadline for spend</b>
	3 x LTNs total	Bruce West	Grove Green LTN		
Tranche 1	None			N/A	N/A
Tranche 2	£866k	£325k including initial allocation of £65k for community engagement and design.		11 March 2022	30 September 2022

Tranche 3	£927k	£368k for four School Streets £24k for cycle hangars £120k for Belmont Road traffic modelling	11 December 2021	11 March 2022 with works complete by 31 March 2022
Total	£1.793m	£837k		

### **Engagement and Consultation**

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

#### Engagement Stage 1 - Early engagement

- 6.28 The Council launched early engagement with residents and businesses on the proposed Bruce Grove LTN in February 2021. A letter was sent to all addresses within the proposed Bruce Grove LTN area explaining how to get involved with the emerging proposal and inviting residents and businesses to let the Council know what transport and travel issues they were experiencing, and what interventions or improvements they would like to see implemented in the proposed Bruce Grove LTN area. Residents were given the opportunity to share their views on an interactive engagement map and to join an online public meeting. For those without internet access, replying to the letter by phone and post was possible. Targeted meetings with schools in the proposed Bruce Grove LTN area, the emergency services and local disability groups were also carried out. The feedback received at this engagement stage was reviewed and analysed. A key finding from Engagement Stage 1 was significant local support for expanding the proposed Bruce Grove LTN westwards to include the area bounded by Belmont Road/Downhills Way, West Green Road and Westbury Avenue. As a direct consequence and having regard to the practicality of expanding the proposed LTN to include two adjacent cells identified on Figure 1 (Bruce Grove and Turnpike Lane East), the area of the proposed LTN was

expanded and the Council began referring to it as the Bruce Grove West Green LTN.

- 6.29 A summary and analysis of the comments on the interactive online engagement is provided at Appendix E. 2,071 people visited the site and there were 515 confirmed respondents. 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'. The most common suggested improvements from respondents were '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 Avenue/Sperling Road junction and Higham Road. Approximately 120 people attended the online public meeting.
- 6.30 A summary of written responses to participant questions at the online meeting is provided at Appendix F.

### Engagement Stage 2: Community Design Workshops

- 6.31 On 26 and 27 May 2021, the Council held online community design workshops for the proposed Bruce Grove West Green LTN. The public workshops were open to all residents in the project area. Letters were sent to all addresses in the area in advance and attendees were able to comment on two design options for their area and raise any potential issues or suggestions about the design. The events were attended by approximately 150 people.

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

#### How was consultation undertaken?

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

Council website	Consultation hosted on Council website where all key documentation published  FAQs
Social media	Twitter, facebook, instagram

Consultation leaflet	Sent to every address and available in local libraries
Haringey People Extra bulletin & Haringey Business Bulletin	LTN item included within email bulletins and available within local libraries
Survey	<p>Sent to every address (freepost return)</p> <p>Could also be completed online, via phone, sent via email or completed in person and deposited at 5 of the borough's libraries</p>
Accessible version of consultation leaflet and survey	Published on the council's website with paper copies available on request.
Translations	Consultation leaflet available on request in 4 commonly spoken languages
Specific stakeholder groups	Bespoke strategies used for specific groups. Detail set out in following paragraphs.
Consultation events	<p>Street exhibition boards in Bruce Grove and West Green</p> <p>Pop-up exhibitions at Turnpike Lane Station, Lordship Recreation Ground Hub, Broadwater Farm</p> <p>Outside school engagement: Bruce Grove Primary School, Willows Primary School/ The Brook Primary School, The Grove School/Belmont Junior School/Belmont Infant School</p>
Posters/lamp columns	25 lamppost wraps and 100 posters were placed across the LTN area

6.33 It was identified before the public consultation that Broadwater Farm Estate is an area within the Bruce Grove West Green LTN where many residents are underrepresented in consultations. To help mitigate this and facilitate participation additional pop-up events were carried out at Broadwater Farm. Using engagement boards and staff positioned at key locations, leaflets were handed out to local residents reminding people about the project. Residents were able to stop and ask questions about the proposals. Leaflets and information were shared at the bus stop and shops/facilities/Community Centre on the Estate.

Leaflets translated into Kurdish and Somali were also placed in the entry halls of buildings within the estate.

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

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

#### What was consulted on?

6.35 The Bruce Grove West Green LTN consultation option is set out in the consultation leaflet at Appendix G. The consultation option broke the LTN area into 2 sub-areas:

Area A: Bounded by Lordship Lane, Tottenham High Road (A10), Philip Lane/West Green Road and Belmont Road/Downhills Way

Area B: Bounded by Downhills Way/Belmont Road, West Green Road and, Westbury Avenue.

6.36 Within each area, filters were proposed on a trial basis to stop traffic travelling through the area from one boundary road to another boundary road (i.e. rat-running).

6.37 A range of complementary measures were also proposed including:

- School Streets for Willow Primary School and The Brook Primary School, Bruce Grove Primary School, The Grove School and Belmont Junior School (on a trial basis)
- Two new zebra crossings (permanent)

- Six new cycle hangars (permanent)

#### *High-Level Transport Assessment (HLTA)*

- 6.38 Under the Traffic Management Act 2004, Haringey Council has a ‘network management duty’ under section 16 in its capacity as local traffic authority. The duty is “to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives—
- (a) securing the expeditious movement of traffic on the authority’s road network; and
  - (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.”
- 6.39 As part of this duty, alongside the consultation option, the Council also published a high-level transport assessment (HLTA) for the proposed Bruce Grove West Green LTN. The HLTA (Appendix H) was undertaken to assess the potential impacts of the proposed Bruce Grove West Green LTN on the highways network. Most internal roads are expected to see a reduction or neutral impact on motor traffic as a result of the scheme. The HLTA assumes that capacity exists on the main roads surrounding or passing through the LTN and so motor traffic can divert onto these. The HLTA consequently indicates a range of potential negative impacts on motorised vehicular traffic on certain parts of the boundary roads and at certain times (from a 0-50% increase to a 100%+ increase). However, the HLTA presents a “worst-case scenario” and assumes that, with the LTN in place, people will continue driving exactly the same journeys as they did previously, but merely divert to the closest route available. That, in reality, will not materialise as several of the boundary roads are already close to capacity and would not be able to accommodate this increase in demand. As a result, some drivers will attempt to use these boundary roads and generate additional traffic pressure in the short-term but are expected to quickly re-route their journeys further afield or otherwise change their travel behaviour.
- 6.40 Notwithstanding this, evidence from other LTN schemes across London shows that, after 6 months, significant behaviour change takes place, mitigating the increase in demand on boundary roads. The HLTA points to analysis by Sustrans on 21 boundary roads indicating a mixed picture following LTN implementation. On average, daily traffic volumes on boundary roads increased by 3% compared to before the trial. In the worst case, daily traffic flow on one boundary road increased by 32%. In the best case, daily traffic flow on one boundary road saw a reduction of 31%.
- 6.41 The HLTA also considered the potential impact if the Bruce Grove West Green LTN was implemented alongside the St Ann’s LTN which the Council is also

proposing. This showed that, if both schemes are implemented at the same time with Option A for St Ann's, the impacts on West Green Road may reduce, with motor traffic reassigning onto the wider network before it reaches the St Ann's area. Irrespectively, the implementation of the St Ann's LTN significantly curtails north-south movement and thus makes the use of Downhills Way and Belmont Road in the Bruce Grove/West Green LTN less attractive as a peak hour travel route.

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

- 6.42 The EqIA (Appendix I) assessed the likely impacts of the proposed Bruce Grove West Green LTN and complementary measures on groups with protected characteristics as defined by the Equality Act 2010. In addition, it gave consideration to the potential impact of the proposal on other groups not specifically protected under the Equality Act including parents/carers and/or socio-economic groups.
- 6.43 The measures are considered to advance equalities for many protected groups, albeit with a small disadvantage noted for those solely reliant on motor vehicles for transport. On balance, the scheme was considered to promote equality of opportunity among protected groups.

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

- 6.44 The consultation ran for 5 weeks from 16 August 2021 to 17 September 2021. In total 1,223 people responded to the consultation – 1,122 via the online survey and 101 via paper surveys. A copy of the survey is provided at Appendix J. There were also 65 emails received providing feedback on the scheme.
- 6.45 A consultation report is provided at Appendix K. A summary of respondents and responses is provided below.

#### *Respondents*

- 6.46 70% of respondents lived within the Bruce Grove West Green LTN area. 5% lived on boundary roads of the Bruce Grove West Green LTN and 21% lived outside the Bruce Grove West Green LTN area and boundary roads but within LB Haringey.
- 6.47 Despite the Council delivering additional engagement on the Broadwater Farm Estate compared to elsewhere within the Bruce Grove West Green (see paragraph 6.33), there was a proportionately lower response from the Broadwater Farm area compared with elsewhere within the proposed Bruce Grove West Green LTN.

- 6.48 15% of the respondents said they have a physical or mental health condition/illness.
- 6.49 Participants were asked if they owned or had access to a private car. 29% said "No" and 71% said "Yes". In comparison, 59% of households in Bruce Grove and 57% in West Green ward are without a car/motor vehicle.

#### *Feedback*

- 6.50 When asked how they felt about the Council proposing to reduce traffic within the Bruce Grove West Green LTN area, 53% of participants gave a positive response (638 people) while 42% responded negatively (510 people).
- 6.51 However, there were more negative responses than positive responses when people were asked about the proposed changes in each of the two areas within the Bruce Grove West Green LTN. (i.e. to the filters needed to deliver the LTN). For Area A, there were 50% negative responses and 43% positive responses. For Area B there were 50% negative responses and 44% positive responses.
- 6.52 There was, however, high positivity for the proposed complementary measures of crossings, School Streets and bike hangars.
- 6.53 When asked how they felt about the Council proposing to reduce traffic within the Bruce Grove West Green LTN area, 54% of participants living within the proposed Bruce Grove West Green LTN area gave a positive response (441 people) while 41% responded negatively (337 people). For participants living within the proposed Bruce Grove West Green LTN area , there were 41% positive responses (228 people) and 51% negative responses (282 people) to the proposed changes in Area A and there were 41% positive responses (203 people) and 53% negative responses (263 people) to the proposed changes in Area B.
- 6.54 When asked how they felt about the Council proposing to reduce traffic within the Bruce Grove West Green LTN area, 31% of participants living on boundary roads gave a positive response (19 people) while 54% responded negatively (33 people). For participants living within the proposed Bruce Grove West Green LTN area, there were 20% positive responses (8 people) and 63% negative responses (26 people) to the proposed changes in Area A and there were 30% positive responses (12 people) and 63% negative responses (25 people) to the proposed changes in Area B. Given that the HLTA suggested there was a likelihood for increased levels of motor traffic on these boundary roads, this outcome is to be somewhat expected but indicates the importance of monitoring changes in traffic patterns over time to ascertain what further changes to the wider highway network may be needed. However, the boundary roads are classified as either A-roads or B-roads and, from a network management perspective, are therefore expected to carry higher levels of traffic than other roads.

- 6.55 The open text data provided key context around the reasons for negativity to the proposed Bruce Grove West Green LTN. The main reason people expressed negative views was concern about increased traffic on main roads (274 comments), followed by concerns around increased car journey times (129 comments) and increased air pollution on main roads (171 comments), in particular near schools.
- 6.56 There was a strong theme around equity, in particular around the impact of those living on the boundary roads and it impacting on less affluent households, as well as the impact on older and disabled people.
- 6.57 Disabled respondents were less positive about the schemes than non-disabled respondents. 61 responses were received to the Disabled People & Carers surveys from people within the Bruce Grove West Green area. Response themes from the survey were along similar lines to the overall survey, although they often linked the issues specifically to an aspect of their disability/health. Key issues raised included longer journey times, the impact of the Bruce Grove West Green LTN on main roads, blocked access to doctors, pharmacy and other medical services as well as school and education, and impacted access for care givers. Various comments highlighted the benefits of LTNs with a small number saying the Bruce Grove West Green LTN would improve their mobility and open up routes for them to walk, cycle or use a wheelchair.
- 6.58 People without access to a car were significantly more positive about the schemes than those with. Those without access to a car did not respond to the consultation as much as those who do have such access to fully reflect the local car ownership/access - and so their views are, in essence, underrepresented. Those who cycle, walk, and who walk with a pushchair/buggy were the most positive groups, while those that drive or are driven in a private car were much less positive about the scheme. The most positive age groups were younger people and men were more positive about proposals to reduce motor vehicle traffic than women.
- 6.59 As noted at paragraph 6.47, there was a proportionately lower response to the consultation from residents on Broadwater Farm Estate or in its close proximity. Although the lower response does not in any way suggest that the consultation process is flawed, it is considered that there is merit in undertaking further engagement in order to further gauge local opinion and validate the final designs, given future construction traffic movements associated with its redevelopment in tandem with limited future access.

*Responses from key emergency services*

- 6.60 The Metropolitan Police Service responded stating that it has no objection to the proposals. It suggested that it would like the Council to consider changing certain physical filters (i.e. hard closures) to camera enforced filters. No formal consultation response was received from the Police's Secure by Design department, however the Council met with their officers to seek their views on the proposals.
- 6.61 The London Fire Brigade expressed concerns about hard closures stating that an approach that does not require physical barriers would be advantageous. It said that more detail was required about layouts to ensure that it does not impede its appliances.
- 6.62 The London Ambulance Service (LAS) stated that it supported measures to improve public health by reducing traffic and encouraging walking and cycling but stressed the importance of ensuring that emergency vehicle access is properly considered in all LTN schemes. The LAS indicated a preference that, where possible, hard closures (i.e. physical barriers) are avoided and soft closures (i.e. camera enforced filters) are used instead. It was also requested that any subsequent traffic management order has appropriate exemptions for ambulance, fire and police purposes. The LAS indicated concerns about the number of hard closures within the Bruce Grove West Green LTN and the fact these would create a complex and difficult areas for crews to navigate. The response raised issues with various proposed filters in Area A including on Mount Pleasant Road, Linley Road, Pembury Road and around Sperling Road. For Area B the response requested improved access to Rusper Road and/or Sandringham Road.

#### *Responses from businesses*

- 6.63 123 responses were received across the borough to the Council's Business Perception Survey. 77% of responses were from business owners/managers and 22% from employees. The survey revealed that there is a wide spread of ways in which businesses carry out loading/deliveries/collections of goods. The most common response to this question was that loading/deliveries/collections of goods are carried out six days a week (19%), closely followed by seven days a week (17%). When asked about how many deliveries they received per day, the most common response was one delivery per day (29%), followed by two deliveries by day (19%). In response to the question about what mode of transport business deliveries arrive by, the most common response was by van (38%), closely followed with by HGV/lorry (36%). After this, the third most common response by respondents was by car (22%). Respondents were then asked where they currently load their goods from, and answered this question with a spread of answers, including at the front of their shop, on a side street, and at the back of their shop.

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

#### Summary of Council response to consultation

- 6.65 The proposed Bruce Grove West Green LTN has been developed over 10 months informed by a significant amount of engagement with local residents and other key stakeholders. In early 2021 the Council began early engagement with residents and businesses on the proposed Bruce Grove LTN. The most common issues raised by respondents were 'traffic speeding', 'traffic volume' and 'rat-running traffic.' The most common suggested improvements from respondents were 'reduce traffic volume', 'reduce traffic speeds' and 'increase traffic and speeding enforcement'. Having regard to feedback received that the proposed LTN should include the area between Belmont Road/Downhills Way, West Green Road and Westbury Avenue the proposed LTN was extended and the Council began referring to it as the Bruce Grove West Green LTN. Following this, a series of LTN design proposals were developed to help address the concerns raised. Engagement was carried out on these in May 2021 via online Community Design Workshops. The preferred option was the subject of public consultation as part of Engagement Stage 3.
- 6.66 Overall respondents were positive about the Council proposing to reduce traffic within the Bruce Grove West Green LTN area. It is noted that the margin of positivity was slight but respondents without access to a car (who were found to be much positive about the LTN than those who own or have access to a car) were significantly underrepresented.
- 6.67 While there was an overall negative response to the specific changes proposed in both areas of the Bruce Grove West Green LTN, this did not always reflect total opposition to the Bruce Grove West Green LTN; rather, in many cases, it reflected specific concerns with the proposed approach rather than the principle. The main reasons people expressed negative views were increased traffic on main roads, increased car journey times and increased air pollution on main roads in particular near schools. The ultimate goal of the Bruce Grove West Green LTN is

to reduce traffic both within the LTN and on the boundary roads of the LTN. Data from trial LTNs implemented in boroughs such as Hackney, Lambeth and Islington has shown a mixed picture regarding traffic reduction. Traffic volumes within the LTNs reduced substantially. Although traffic on a few boundary roads increased, after a settling in period traffic volumes on the majority of boundary roads has tended to remain static or in some cases decreased. With regards to concerns about increased journey times, evidence suggests that traffic volumes and congestion tend to decrease across a neighbourhood when an LTN is introduced. Residents within the Bruce Grove West Green LTN may need to drive slightly further to reach some destinations, but one of the aims of LTNs is to encourage residents to drive shorter journeys less frequently, and instead make short trips by walking and cycling more often. In terms of concerns about air pollution on main roads, evidence from Waltham Forest<sup>11</sup> has shown air quality to improve on main roads after LTNs are introduced.

## **Conclusion**

- 6.68 It is not possible to predict exactly what the impacts of the proposed Bruce Grove West Green LTN will be. The HLTA predicted a reduction in motorised vehicular traffic within the proposed Bruce Grove West Green LTN area and a range of potential negative impacts on motorised vehicular traffic on certain parts of the boundary roads and at certain times (from a 0-50% increase to a 100%+ increase). However, it should be noted this is only a prediction and was based on the worst-case assumption that all motorised vehicular traffic reassigned to the nearest available route and assuming the boundary roads are able to accommodate additional motorised vehicular traffic.
- 6.69 From a network management perspective, the HLTA suggests that the implementation of the Bruce Grove West Green LTN in isolation would have a negative impact on the “expeditious movement of traffic” on the likes of West Green Road and Belmont Road. There will inevitably be a period of adjustment of traffic routes selected by motorised vehicle users that can no longer rat-run through the LTN and the adjacent potential St Ann’s LTN. However, there is insufficient spare capacity on the likes of West Green Road, Belmont Road and Westbury Avenue to accommodate the scale of increased traffic suggested by the HLTA so traffic will divert to alternative routes, resulting in a subsequent stabilisation of traffic movements and route selection.
- 6.70 A separate Cabinet report has been prepared recommending the implementation of the St Ann’s LTN as part of the Council’s wider LTN delivery programme. The HLTA considered the potential impact if the Bruce Grove West Green LTN was implemented alongside the St Ann’s LTN. It showed that, if both schemes are implemented at the same time the impacts on West Green Road may reduce,

---

<sup>11</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)

with motor traffic reassigning onto the wider network before it reaches the St Ann's area. Irrespectively, the implementation of the St Ann's LTN significantly curtails north-south movement and thus makes the use of Downhills Way and Belmont Road in the Bruce Grove/West Green LTN less attractive as a peak hour travel route.

- 6.71 The public consultation indicated overall support for reducing the traffic within the Bruce Grove West Green LTN area, although there was an overall negative response to the proposed changes in each of the two areas within the Bruce Grove West Green LTN. In many cases, negative responses reflected particular concerns about the effects of the proposed LTN (e.g. displacement of traffic) or detailed design matters LTN (e.g. the type and locations of filters). Having reviewed the key concerns in detail there are a variety of ways the Council can mitigate them, including through changes to the design of the Bruce Grove West Green LTN, comprehensive monitoring while the experimental scheme is in force and continued engagement with the local community and other key stakeholders and communities.
- 6.72 Having regard to the potential for the LTN to deliver significant benefits such as reducing traffic, reduction in injury risk, reduced air pollution and increases in active travel, and taking account of the Equalities Impact Assessment, which indicates potential for net positive benefits for those with protected characteristics, it is recommended that the LTN is implemented. The recommendation is for a trial scheme which, if necessary, the Council is able to make changes to while it is in force to address or mitigate some of the issues arising such as affects the highway network or local amenities and with a linked commitment to comprehensive monitoring to be set out in a detailed monitoring proposal document. Having regard to public support for the suggested complementary measures as well as their potential to support the Council's aims for the LTN and wider area it is also recommended to introduce the complementary measures. Monitoring will be established before the LTN and School Street trials goes live such that there is a robust data baseline and will include ongoing monitoring of traffic (all types) and air pollution both within the Bruce Grove West Green LTN, on major boundary roads including outside schools and elsewhere at key locations on the borough's road network.
- 6.73 Having regard to consultation feedback and further dialogue with key stakeholders, changes are proposed to the experimental Bruce Grove West Green LTN and complementary measures that are proposed to be implemented. The key changes are set out below:

Table 2 Post-consultation design changes

Area of LTN	Key post-consultation changes	Reason for change
-------------	-------------------------------	-------------------

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	Due to the high numbers of students with special needs at these schools who require transport assistance alongside the fact that a large residential car park underneath the blocks of Manston and Lympne enters onto the road at this point school street delivery has been paused to allow further discussions with the parents, carers, and local residents. This will also feed into the wider redevelopment of the Broadwater Farm Estate. The Council will review further measures outside the school to keep the traffic flowing at its busiest times and creating safe space for pedestrians
Bruce Grove West Green LTN Area B	School street at Grove School Removed	Grove School specialises in supporting students with autism and additional needs including a cognitive impairment, language difficulties, or difficulties associated with social communication. As such many students require transport assistance. As traffic levels related to the school are low

		and spread out over a longer period, and following detailed discussion with the school, the Council agrees that this school street is not needed now, but will keep this under review
	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.
	Filters reconfigured to allow access from Belmont Road but ensure no through routes	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.
	Removal of Sandringham Road filter	In response to emergency service request

- 6.74 After the consultation closed the Council met with the emergency services to discuss their responses. As a result of this discussion three changes were made to the design as set out above: the Pembury Road filter (Area A) was changed from a physical to an emergency access filter, the arrangement of filters around Sperling Road (Area A) was amended, and the physical filter on Sandringham Road (Area B) was removed.
- 6.75 A plan of the experimental Bruce Grove West Green LTN, School Streets and other complementary measures proposed for implementation is provided at Appendix L.

### Exemptions

- 6.76 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 Meeting the needs of those with access and disability needs has been an important part of the Bruce Grove West Green 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 Bruce Grove West Green LTN including the types/locations of filters and the locations of the new pedestrian crossings.

- 6.78 The EqIA (Appendix I) assessed the likely impacts of the consultation version of Bruce Grove West Green LTN and complementary measures on groups with protected characteristics as defined by the Equality Act 2010. It found that, on balance, the LTN and complementary measures promote equality of opportunity among protected groups, but a small disadvantage was noted for those solely reliant on motor vehicles for transport.
- 6.79 Having regard to this and feedback received from those with access and disability needs through Engagement Stage 3, careful consideration has been given to the case for the Council to provide certain exemptions for the proposed Bruce Grove West Green LTN. The proposed Bruce Grove West Green LTN maintains accesses to all properties within the LTNs, but routes taken to a given property may need to change. The benefits of not providing exemptions to the LTN are to provide the safest possible environment for people to walk, wheel and cycle by significantly reducing motorised traffic and to reduce as far as possible congestion and air pollution. However, feedback and evidence indicated that such an approach would potentially result in negative impacts for some people some of the time who have a protected characteristic, in particular for disabled people.
- 6.80 On the basis of the above and to ensure the Bruce Grove West 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 Bruce Grove West Green LTN experimental scheme:
  - Blue Badge holders living within the Bruce Grove West 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
- 6.81 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.
- 6.82 The exemptions will be subject to an application process and exact criteria will follow in due course.
- 6.83 There will also be a separate route for individuals who do not live within the LTN or on the immediate boundary of it to obtain an exemption to drive through a designated filter, through an exceptional circumstance dispensation.

- 6.84 The above exemptions will not apply to the trial School Streets within the Low Traffic Neighbourhood. For the trial School Streets, the Council's approved School Streets Exemptions Policy will be applied.
- 6.85 Building on comprehensive engagement done so far to understand the potential impacts of the proposals on groups with protected characteristics, the Council will continue to work with relevant organisations to ensure that, as far as possible, the Bruce Grove West Green LTN advances equality. The Council will continue to engage with Transport for All whose recent report 'Pave the Way: The impact of Low Traffic Neighbourhoods (LTNs) on disabled people, and the future of accessible Active Travel' is noted.
- 6.86 The Council will closely monitor the impacts of the trial Bruce Grove West Green LTN, both through a comprehensive monitoring strategy and further engagement with the community and key stakeholders. Should this indicate impacts on groups with protected characteristics which need to be mitigated then the above exemptions list will be reviewed.

#### **Updated EqIA**

- 6.87 The Council has prepared an updated EqIA in respect of the Bruce Grove West Green LTN, School Streets and other complementary measures proposed for implementation. This is provided at Appendix M. The updated EqIA found that the proposals will advance equalities for many protected groups. While a small disadvantage is noted for those solely reliant on motor vehicles for transport, it notes a range of ways in which the Council is mitigating the identified impacts including post-consultation changes to the design of the LTN, making certain groups and categories of transport exempt from some of the restrictions, and further engagement with some residents and/or their representative groups.

#### **Implementation of Bruce Grove West Green LTN & complementary measures and Engagement Stage 4: public objection period**

- 6.88 The Bruce Grove West Green LTN will be implemented via traffic management orders. These are legal documents which enable the Council, as the local traffic authority, to impose traffic and parking restrictions to manage traffic in the borough.
- 6.89 There are 3 types of traffic management orders:
- permanent
  - experimental
  - temporary
- 6.90 The Bruce Grove West Green LTN and School Streets are proposed to be implemented via experimental traffic management orders.

- 6.91 Experimental traffic management orders (ETMOs) are schemes introduced as an experiment to see what its effects are and can be changed if necessary. They last up to 18 months before either being abandoned, amended or made permanent. An ETMO can only stay in force for a maximum of 18 months while the effects are monitored and assessed. Formal objections to a subsequent order to continue the provisions of the ETMO in force indefinitely must be made in the first six months of the ETMO coming into force. If changes are made, six months are allowed for such an objection from the date those changes came into operation. A decision on whether the changes introduced will be removed or made permanent must be made within 18 months of an order coming into force.
- 6.92 During the period in which the ETMOs are in force, the Council can modify or suspend the operation of the ETMO if it appears essential in the interests of the expeditious, convenient and safe movement of traffic or for providing suitable and adequate on-street parking facilities, or for preserving or improving the amenities of the area through which any road traffic affected by the order runs.
- 6.93 During the period in which the ETMOs are in force, the Council will carry out **Engagement Stage 4: public objection period**. This will provide a further opportunity for the community and other stakeholders to provide feedback on the proposals. The Council will review all formal objections and feedback provided and this together with the comprehensive monitoring outlined above will inform whether any changes are necessary to the scheme while it is in force.
- 6.94 Notwithstanding the above, it should be noted that it will not be possible to resolve all issues which arise whilst the experimental measures are in place. In the first instance, it will be necessary for the Council to allow a 'settling-in' period for drivers to adjust their travel behaviour to the new highway arrangement. In the second instance, the Council will be limited in terms of what changes it can make and the scope of potential changes will likely only extend to slight adjustments to deal with minor localised issues. Lastly, it will not be possible to make immediate changes and depending upon the nature of any changes required these could take some time to implement. This is because any significant changes will require a revised experimental traffic management order and mean that the period of the experiment starts afresh. For this reason, it would not be prudent to consider any significant changes to the ETMO for the LTN for at least two months, given that it will take time for altered traffic behaviour and route selection to stabilise.
- 6.95 The decision as to whether or not to make the LTN and School Streets permanent will be subject to a separate decision by the Council.
- 6.96 The proposed bike hangars will be implemented by exercising powers under section 63 of the Road Traffic Regulation Act 1984.

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

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

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

6.103 In the interim period until implementation, the Council will undertake any further notification / consultation with local residents as deemed necessary, including with residents of Broadwater Farm as noted earlier in the report.

6.104 Due to the significant scale of the Bruce Grove West Green LTN itself, it will not be possible to implement all elements at one time. The filters which make up the LTN will therefore be implemented on a phased basis over a period of approximately one month. This process will be closely managed to ensure the effective operation of the highway network at all times.

6.105 The next steps for the Bruce Grove West Green and complementary measures LTN are as follows:

**December 2021: Update**

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

**Spring 2022: Implementation of complementary measures**

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

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

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

**Autumn 2021 – Winter 2022: Monitoring**

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

**Winter 2022: Review**

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

**Spring 2023: Decision**

- Decision on whether to make the trial changes permanent.

**Spring 2023: Update**

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

## **7 Contribution to strategic outcomes**

7.1 The proposal to introduce the Bruce Grove West Green LTN experimental scheme and complementary measures will support the 'Place' Priority of the Borough Plan 2019-23 including specific objectives to:

- increase the levels of physical activity across the borough

- improve air quality, especially around schools
- reduce CO<sub>2</sub> by 40% before 2020 and begin the journey to reduce to zero by 2050
- provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users
- improve connectivity around the borough especially for pedestrians and cyclists

7.2 In addition, the scheme will support the delivery of key Council strategies including the Transport Strategy, Climate Emergency Action Plan, Air Quality Action Plan, School Streets Plan and emerging Walking and Cycling Action Plan as summarised in Appendix A.

## **8 Statutory Officers' comments**

### **Finance**

- 8.1 The report requests Cabinet to approve the recommendations as set out in Section 3 of this report. TfL have allocated £1.793m for three LTN Schemes, including for Schools Streets, cycle hangars and transport modelling. The funding of the Bruce Grove LTN is set out as below.
- 8.2 The estimated costs of delivering the Bruce Grove West Green LTN exceed the available external funding and currently identified internal funding. The cost estimate for implementation may change as a result of detailed design but, in any event, additional funding will need to be found to address the funding gap before the project can proceed.
- 8.3 As set out below, the Bruce Grove West Green LTN is not proposed to be implemented until the 2022/23 financial year. The Council will seek to obtain further external funding towards the Bruce Grove West Green LTN before the point of implementation. Having regard to the above, confirmation of funding for the Bruce Grove West Green LTN will be subject to a future decision to be made regarding the 2022/23 financial year.
- 8.4 It is estimated that the School Streets can be delivered within the available external funding. The bike hangars will be delivered using available external funding plus a contribution from the £5.1m Haringey Strategic Community Infrastructure Levy (CIL) allocation towards Streetspace Plan Projects for walking and cycling (approved by Cabinet on 8 December 2020) as part of the Council's Capital Programme. There is no external funding available for the proposed crossings so these are to be funded via the same CIL allocation.

Item for delivery	Estimated cost	Funding source	Funding status
-------------------	----------------	----------------	----------------

Bruce Grove West Green LTN	£549k	£325k Tranche 2 DfT Funding	Part funded
School Streets	£251k	£368k Tranche 3 TfL funding	Fully funded
Bike hangars	£36k	£24k Tranche 3 TfL Funding + Strategic CIL	Fully funded
Crossings	£70k	Strategic CIL	Fully funded
Belmont Road traffic modelling	£120k	£120k Tranche 3 TfL Funding	Fully funded

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

### **Procurement**

- 8.6 N/A

### **Legal**

- 8.7 The Council as a local traffic authority must under section 16(1) of the Traffic Management Act 2004 manage its road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the objective of securing the expeditious movement of traffic, including pedestrians, on the Council's highway network and facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- 8.8 Section 16(2) of the 2004 Act refers to action which the authority may take in performing the network management duty including, in particular, the stated action and which may involve the exercise of the stated power.
- 8.9 Section 6 of the Road Traffic Regulation Act 1984 ("RTRA") allows for the making of permanent traffic orders restricting or prohibiting use of a road or part of one by particular types of vehicles or pedestrians, referred to as traffic management orders ("TMO"); sections 9-10 provide for the making of experimental traffic orders ("ETOs"), which may not last longer than 18 months and may be continued from time to time during the period of up to 18 months from the date the order first came into force.
- 8.10 When exercising its functions under the RTRA the Council must under section 122(1) so far as practicable having regard to the matters specified in subsection (2) secure the expeditious, convenient and safe movement of vehicular and other

traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway.

- 8.11 The “matters specified” in subsection (2) are (1) the desirability of securing and maintaining reasonable access to premises; (2) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run; (3) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy); (4) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles and (5) any other matters appearing to the .... local authority to be relevant”
- 8.12 Section 122 of the RTRA involves a balancing exercise that has involved the Council’s officers having in mind the section 122(1) duty, having regard to factors pointing in favour of imposing a restriction on that movement (as discussed in this report), balancing the various considerations and coming to the conclusion that the recommendations in this report represent the appropriate outcome The factors which have pointed in favour of imposing a restriction on that movement have included the objective of reducing pollution and carbon emissions, improving health outcomes, reducing collisions and reclaiming neighbourhood streets for pedestrians.
- 8.13 The procedures that must be followed before making a traffic regulation order are set out in the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 (the “1996 Regulations”). Under regulation 6, various bodies such as affected transport providers and the local fire brigade must be consulted.
- 8.14 There is no requirement to consult the general public before an ETO is made like there is for a TMO, but where the ETO may affect passage along any road the Council must consult such other organisations (if any) representing persons likely to be affected by any provision in the order as the order making authority thinks it appropriate to consult.
- 8.15 An ETO must be genuinely experimental in nature - an operation designed to glean information about the workings of a scheme in practice.
- 8.16 Although there is no statutory requirement to consult the general public before making an ETO to implement this LTN, the Council’s aspirations to make the Borough a healthier place to live, work and rest and safer for school children walking and cycling to school are dependent on community support and involvement, which engaging with people affected by these proposals will help achieve.

- 8.17 A consultation will not be lawful unless it is (1) undertaken at a time when proposals are still at a formative stage; (2) sufficient reasons are given for any proposal to enable people who are interested in the same to consider the proposals and make representations; (3) adequate time has been given for such consideration and response; and (4) all representations have been conscientiously taken into account when finalising the proposals.
- 8.18 From the information within this report it appears that the Council has informed every household and business in the relevant area(s) of the proposals regarding the LTN and given households/businesses [five] weeks within which to provide responses. The responses received have been analysed and regard had to the same when considering which of the proposed changes to proceed with.
- 8.19 The exercise of the power contained in section 63 of the RTRA to provide parking places for securing bicycles and to restrict the use of part of a road so that bike hangars can be installed without prior notification or the need for a traffic order can be exercised by Cabinet in accordance with the Council's Constitution.
- 8.20 The exercise of the power contained in section 23 of the RTRA to provide pedestrian crossings without the need for a traffic order can be exercised by Cabinet in accordance with the Council's Constitution.

### **Equality**

- 8.21 The Council has a Public Sector Equality Duty under the Equality Act 2010 to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
  - Advance equality of opportunity between people who share those protected characteristics and people who do not
  - Foster good relations between people who share those characteristics and people who do not.
- 8.22 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 8.23 The proposed scheme has been assessed via a comprehensive Equalities Impact Assessment (Appendix L). A brief summary of the assessment is provided below:

<b>Characteristic</b>	<b>Assessment summary</b>
-----------------------	---------------------------

Age	<p>Despite declines in active travel amongst children, walking is still the most frequent travel mode for young people in Haringey. Reducing motor traffic on minor roads particularly benefits younger people as they walk often and are 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.</p> <p>Air pollution particularly impacts on children living in deprived areas. 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.</p> <p>Various mitigations are noted in relation to young people as a result of feedback from public consultation including changes to the design of the LTN and School Streets and an exemption to the LTN for SEN transport vehicles.</p> <p>Whilst walking is the most frequently used mode of Londoner's aged 65 and over, it is recognised that distances people can walk or cycle tend to reduce in the later years of life. 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. Schemes which change motor vehicle access could have a negative impact on this group such as increased journey times under peak flows. However, in the proposed LTN designs, all local amenities and homes do remain accessible by motor vehicle, although some rerouting may be required depending on origin or destination.</p>
Disability	<p>Disabled people are much more likely to be injured as a pedestrian than non-disabled people. LTNs create many more 'low road danger' streets and easier crossing which particularly benefits high risk groups like disabled people. 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. 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. Where disabled people rely on motor vehicles they may experience some variance in journey time following implementation of an LTN. There is potential for an increase in the short term with longer term impacts unknown.</p> <p>Mitigations are noted as a result of feedback from public consultation and engagement including changes to the design of the LTN and an exemption to the LTN for blue badge</p>

	holders living in the LTN area and on the immediate boundary of it.
Sex	<p>Women frequently travel as pedestrians so delivering a network of pedestrian-friendly, low traffic streets is expected to make walking more comfortable for women.</p> <p>In the longer term, 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 will benefit women who tend to travel by bus more than men.</p> <p>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. In some cases these trips may require re-routing or experience some variance in journey time following implementation of an LTN. However, it is expected 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.</p>
Gender reassignment	Project unlikely to unduly impact people with these protected characteristics
Marriage and civil partnership	Project unlikely to unduly impact people with these protected characteristics
Religion or belief	Project unlikely to unduly impact people whose religion or beliefs are protected under the Equality Act.
Race	<p>With a high proportion of black, Asian and ethnically diverse London residents making sustainable journeys (walking and bus trips), the reductions in road danger and increased pedestrian priority associated with LTN projects will provide conditions that broadly benefit these groups. Black, Asian and ethnically diverse Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads. When we significantly increase the number of minor roads with infrequent motor vehicles movements it is likely to benefit these groups and lead to desirable changes in behaviour.</p> <p>Mitigation is noted to ensure areas of the LTN with higher proportions of BAME residents are adequately engaged in relation to the trial LTN.</p>
Sexual orientation	Project unlikely to unduly impact people with these protected characteristics
Pregnancy and maternity	Action to reduce motor vehicle reliance will help address motor traffic pollution and serve to better protect pregnant women

	and unborn children. It is recognised 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 in the medium to longer term an expected reduction in traffic congestion will favour those who need to make essential trips by motor vehicle or bus.
--	---

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

## 9 Appendices

- Appendix A: Strategic context
- Appendix B: Haringey Streetspace Plan
- Appendix C: Bruce Grove LTN funding bid
- Appendix D: Bruce Grove West Green LTN Communications and Engagement Plan
- Appendix E: Engagement Stage 1 Commonplace report
- Appendix F: Written responses following Engagement Stage 1 online meetings
- Appendix G: Engagement Stage 3 consultation leaflet
- Appendix H: Engagement Stage 3 High Level Transport Assessment
- Appendix I: Engagement Stage 3 Equality Impact Assessment
- Appendix J: Consultation survey
- Appendix K: Engagement Stage 3 Consultation Report
- Appendix L: Plan of experimental LTN scheme and complementary measures proposed for implementation
- Appendix M: Updated EQIA

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

None