

**Report for:** Cabinet 7 December 2021

**Title:** Implementation of Bounds Green Low Traffic Neighbourhood

**Report**

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**Lead Officer:** Rob Krzyszowski, Assistant Director Planning, Building Standards & Sustainability  
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**Ward(s) affected:** Bounds Green, Woodside, Alexandra

**Report for Key/**

**Non-Key Decision:** Key

**1. Describe the issue under consideration**

1.1 This report seeks approval to implement the Bounds Green Low Traffic Neighbourhood (Bounds Green LTN) experimental scheme and a range of complementary measures including new pedestrian crossings, cycle hangars and two trial School Streets. The Bounds Green LTN aims to reduce or remove non-local motor traffic from residential areas of Bounds Green, as well as reduce the number of short trips made by vehicles which could be walked or cycled. The proposed Bounds 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 Bounds Green LTN. Over the past year, the Council has carried out three separate engagements on the proposed Bounds 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 Bounds Green LTN.
- 2.3 The Council has considered all feedback to the public consultation on the proposed Bounds Green LTN (Stage 3 Engagement) and whilst the overall consultation result was more negative than positive based on a single opposed/support question, this result conceals a wider, more nuanced range of views and should therefore not be the deciding result. Further investigation of the results demonstrated a broad suite of views including residents who were opposed in principle to the LTN, those who had concerns about the impact of the LTN once implemented and other views about design matters including the types and locations of filters. Considering all the views expressed, it is recommended that the LTN trial goes ahead. There are a range of ways in which the Council will mitigate the key concerns expressed, including making post-consultation changes to the proposed Bounds 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.
- 2.4 Unlike the other two LTNs proposed by the Council, the Bounds Green LTN area has been impacted by the Bowes LTN in Enfield. The introduction of the Bowes LTN has led to traffic diverting through Bounds Green to access the A406. This additional through-traffic is having a detrimental effect on our residential areas and therefore an LTN in the Bounds Green area is needed to mitigate against these impacts
- 2.5 The Bounds Green LTN will be a key driver towards a safer, cleaner, greener, fairer and happier borough. It will remove through-traffic from the Bounds Green 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 Bounds 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 including the petition submitted by residents living within the proposed area C of the Bounds Green LTN (Appendix L);
- B) Approves the making of an experimental traffic management order to implement the Bounds Green LTN experimental scheme, as set out on the plan in Appendix M, subject to compliance with relevant statutory requirements and detailed engineering drawings to implement the traffic control measures shown on the plan;
- C) Approves the making of an experimental traffic management order to implement the School Streets, as set out on the plan in Appendix M, subject to compliance with relevant statutory requirements and detailed engineering drawings to implement the traffic control measures shown on the plan;
- D) Approves the implementation of bike hangars, as set out on the plan in Appendix M, subject to compliance with relevant statutory requirements and detailed engineering drawings;
- E) Approve the implementation of pedestrian crossings, as set out on the plan in Appendix M, 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 disability

to non-hard closure filters in the Bounds Green LTN experimental scheme as per paragraph 6.77 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 Bounds 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 M 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 Bounds 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 Bounds 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 Bounds Green LTN. The most common issue raised by respondents was 'Air Quality Concerns', followed by 'Traffic Congestion' and 'Traffic Volumes.' The most commonly suggested improvement from respondents was 'Reduce Traffic Volumes', followed by 'Measures to Improve Air Quality' and 'Reduce Traffic Speeds.' Having regard to this feedback, a series of Bounds Green 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. Based on feedback received at Engagement Stage 2 a preferred design option was developed including a greater element of camera enforced filters versus physical filters.
- 4.2 From 16 August 2021 to Friday 17 September 2021, a public consultation was held on the preferred design options. Although there was an overall negative response to the changes proposed, including an overall negative response from residents living within each of the three areas of the proposed Bounds Green LTN, these headlines conceal a variety of different viewpoints on the Bounds Green LTN. While some people were opposed to the Bounds Green LTN in its

totality, many negative responses reflected concerns that, as currently designed, the proposed Bounds Green LTN would not produce the desired objectives of the Council. In relation to Areas B and C of the proposed Bounds Green LTN, a lot of objections related to residents' rejection of a full-time LTN and a preference for a time-based LTN. A time-based LTN is not supported by the Council as a consequential change in behaviour could simply be a shift in commuting travel times (i.e. to off-peak), it will not reduce existing levels of non-local through-traffic (i.e. off-peak rat-running) and it does not encourage the shift to walking, cycling and other sustainable modes of transport. Furthermore, there are spikes in traffic flows that occur outside of peak hours which, combined with the timed approach that applies to School Streets, would make general understanding of the hours of operation of any LTN extremely challenging. In response to specific concerns raised, the Council has made a number of post-consultation changes to the proposed Bounds Green LTN as well as proposed a number of exemptions to the traffic restrictions. Other key concerns of those opposing the Bounds Green LTN are noted, particularly concerns around increased traffic on main roads, increasing air pollution and longer journey times. However, it is considered that these can be mitigated through monitoring and addressed through changes to the trial Bounds Green LTN if necessary. It is also the case that people without access to a car were significantly underrepresented within respondents. Such people were found to be much more positive about the Bounds Green LTN than those who own or have access to a car.

- 4.3 Introducing the Bounds 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 Bounds Green LTN area, switch to walking, cycling or public transport or even reduce the number of journeys. The proposed Bounds Green LTN scheme 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 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. 52% of households in Bounds Green ward, 54% of households Woodside and 27% of households in Alexandra ward do not have access to a car or van. This means that a large proportion of households in the area do not benefit from the large amount of space on the public highway which currently enables rat-running traffic.

- 4.5 A range of assessments have been carried out to understand the potential impacts of the proposed Bounds 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 Bounds Green LTN which predicted a reduction in motorised vehicular traffic within the proposed Bounds Green LTN area and slight to moderate potential increases in traffic on some boundary roads (0-25%). However, it should be noted this is only a prediction and was based on the worst-case assumption that all motorised vehicular traffic reassigns to the nearest available route and assuming the boundary roads are able to accommodate additional motorised vehicular traffic. 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, 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 Bounds Green LTN in its entirety.
- 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.

4.9 A key reason to implement areas A and B of the proposed Bounds Green LTN is to mitigate impacts of the Bowes Primary Area Quieter Neighbourhood LTN which has been implemented directly adjacent within the London Borough of Enfield. The Bounds Green LTN has been designed having regard to the Bowes Primary Area Quieter Neighbourhood LTN and is required to mitigate a range of impacts which are occurring within Haringey due to the adjacent LTN.

## **5. Alternative Options Considered**

5.1 The alternative options available to the Council are:

Option 1: Implement an alternate design for the Bounds Green LTN. Two options were worked up for Community Design Workshops at Engagement Stage 2 but, following community feedback, a third option was worked up and consulted on at Engagement Stage 3. The initial options are discounted because they do not fully take account of community feedback that there should be a greater focus on camera filters as opposed to physical filters.

Option 2: A petition was submitted in respect of Area C of the Bounds Green LTN which advocates an alternative LTN comprising timed cameras closing the area to all through-traffic, including residents, at school times and other peak periods only and only on weekdays. This option is rejected because the consequential change in behaviour could simply be a shift in commuting travel times (i.e. to off-peak), it will not reduce existing levels of non-local through-traffic (i.e. off-peak rat-running) and it does not encourage the shift to walking, cycling and other sustainable modes of transport. Furthermore, there are spikes in traffic flows that occur outside of peak hours which, combined with the timed approach that applies to School Streets, would make general understanding of the hours of operation of any LTN extremely challenging. These factors would inhibit the introduction of any time-based LTN.

Option 3: Implement the Bounds Green LTN in part i.e. do not implement one or more of the three areas within the proposed Bounds Green LTN. It is considered necessary to implement areas A and B of the Bounds Green LTN in order to mitigate impacts of the Bowes Primary Area Quieter Neighbourhood LTN which has been implemented directly adjacent within the London Borough of Enfield. It is also considered necessary to implement area C of the Bounds Green LTN as the roads within this area are being used rather than remaining on Durnsford Road and Bounds Green Road. All roads within area C are accessible from these main roads but this invariably will require passing through the Durnsford Road/Bounds Green Road traffic-signal controlled junction, lengthening journey time.

Option 4: Not to implement an LTN in Bounds Green i.e. 'Do Nothing'. This option would not mitigate impacts of the Bowes Primary Area Quieter Neighbourhood LTN which has been implemented adjacent to the proposed Bounds Green LTN within the London Borough of Enfield. The Bounds Green LTN has been designed having regard to the Bowes Primary Area Quieter Neighbourhood LTN and is required to mitigate a range of impacts within Haringey. The option to do nothing is discounted as it would not: address the impacts of the adjacent LTN with Enfield and it would not reduce pollution; reduce motor traffic collisions; reduce carbon emissions; reclaim neighbourhood streets for pedestrians and communities; support active travel modes and therefore improved health outcomes; address inequalities with impacts felt disproportionately by those who do not own a car.

## **6. Background**

### **Strategic context**

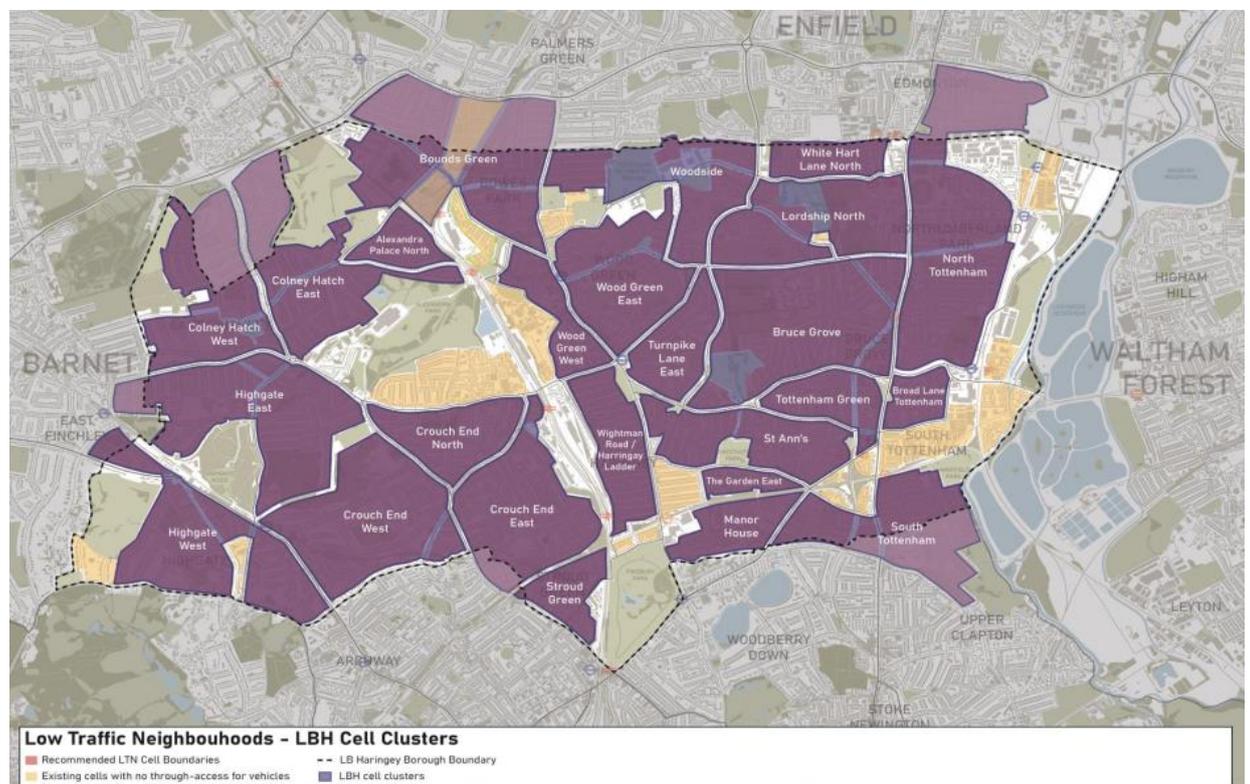
- 6.1 The strategic context for the scheme is provided by the Borough Plan, Transport Strategy, Climate Change Action Plan, Air Quality Action Plan, School Streets Plan, and draft Walking and Cycling Action Plan (WCAP). These are summarised in Appendix A.
- 6.2 The draft WCAP sets out a range of schemes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

### **Low Traffic Neighbourhoods**

- 6.3 Low Traffic Neighbourhoods (LTNs) are area-based traffic management schemes that aim to reduce or remove non-residential motor traffic from residential areas, as well as reduce the number of short trips made by vehicles which could be walked or cycled. A range of measures are usually introduced as part of LTNs which work together to make it more difficult for motor traffic to travel through an area, meaning it is only trips originating from local addresses or delivery and service vehicles that can be made. Measures that are normally introduced in LTNs include one-way streets, banned turns and features called modal filters where roads are closed to motor traffic (at one end or in the middle) removing the ability of non-local traffic to drive along a street. Modal filters can be either be in the form of physical barriers or roads left open for access by permitted vehicles such as emergency services which, in some cases, are enforced via CCTV.
- 6.4 The draft WCAP, published for consultation in November 2021, includes Policy 4 to deliver a network of LTNs across the borough. It sets out that Haringey will

develop a borough-wide vision for LTNs, taking into account the function of the street network, the availability of through routes and the location of key destinations in the borough. As a starting point towards a borough-wide network of LTNs the draft WCAP identifies 25 potential LTN locations as set out in Figure 1.

Figure 1: Potential Low Traffic Neighbourhoods



6.5 Bounds Green is included as one of 25 potential LTN locations in the draft WCAP. An LTN in Bounds Green 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, road danger reduction and safe access to schools.

## 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 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 an LTN can be accessed by car and can receive deliveries and services to their doors, it is the case that some residents and business visitors may have to drive further or use a different road to access their address.

### Traffic reduction versus traffic displacement

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

<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)

- 6.10 A key point of contention is whether LTNs lead to an overall reduction in traffic (i.e. 'traffic reduction') or whether they just displace it from one location to another. It is impossible to predict how people will change their travel behaviour as a result of an LTN. However, evidence from other schemes in London shows that the changes in traffic volumes on boundary roads are very different to what would be predicted by simple reassignment of traffic. A paper<sup>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 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 6 other LTNs introduced in London has shown that, after a few months of a 'settling in' period, impacts on a majority of main roads tended not to be significant (see Appendix H). The growing body of data on LTN impacts in

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<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/>

London has revealed a wide spectrum of impacts from large and small increases and decreases in traffic to insignificant changes either way.

#### Access to properties

- 6.13 As noted above, every property in 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

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

get around. Specific groups who may be presented with difficulties by LTNs include older people and people with disabilities. People and groups who rely on motor vehicles may also be more affected such as those who have carers or who use transport services such as special educational needs and disabilities (SEND) transport. LTNs do not prevent anyone driving to their home or to a particular address as all addresses remain accessible. It is also worth noting that disabled people also walk and cycle therefore their needs will differ to those who use a motor vehicle to get around. .

- 6.17 Each person with disabilities has different needs and they cannot be treated as one homogeneous group. A report by Transport for All set out that the positive 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>.

### 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

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<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>

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

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

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 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) 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 (Appendix C) in response to an LTN being implemented in Enfield. In December 2020 TfL confirmed the Council had been successful with its three LTN bids. It should be noted that the Tranche 1 LTNs (none in Haringey) are different from the Tranche 2 LTNs that the Council has been awarded funding to deliver. In Tranche 1 funded LTNs were required to be delivered without delay with consultation taking place whilst they were in place. In contrast, the Tranche 2 LTNs are expected to be consulted on before implementation.
- 6.26 In June 2021, TfL announced a further funding opportunity (Tranche 3) focused on defined priorities. In July 2021, the Council was allocated £927,000 towards its three in-flight LTN schemes comprising £735,000 for School Streets, £72,000 for cycle hangars and £120,000 for transport modelling.

Table 1: External funding secured towards delivery of LTNs

Tranche	Funding secured		Deadline for committal	Deadline for spend
	3 x LTNs total	Bounds Green LTN		

Tranche 1	None		N/A	N/A
Tranche 2	£866k	£240k including initial allocation of £20k for community engagement and design.	11 March 2022	30 September 2022
Tranche 3	£927k	£184k for two School Streets £24k for cycle hangars	11 December 2021	11 March 2022 with works complete by 31 March 2022
Total	£1.793m	£448k		

### **Engagement and Consultation**

6.27 The development of proposals for the Bounds 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 Bounds Green LTN in February 2021. A letter was sent to all addresses within the proposed Bounds Green 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 Bounds Green LTN area. Residents were given the opportunity to share their views on an interactive engagement map and to join an online public meeting. The online meeting was attended by around 120 people. For those without internet access, replying to the letter by phone and post was possible. Targeted meetings with schools in the LTN area, the emergency services and local disability groups were also carried out. The feedback received at this engagement stage was reviewed and analysed and fed into the initial design development of the Bounds Green LTN.

- 6.29 A summary and analysis of the comments on the interactive online engagement is provided at Appendix E. 1,484 people visited the site and there were 649 confirmed respondents. The most common issue raised by respondents was 'Air Quality Concerns' accounting for 53% of all comments and agreements, followed by 'Traffic Congestion' and 'Traffic Volumes.' The most common suggested improvements from respondents were 'Reduce Traffic Volumes' accounting for 38% of all comments and agreements, followed by 'Measures to Improve Air Quality' and 'Reduce Traffic Speeds.' The principal comment hotspot was on Brownlow Road, followed by Woodfield Way, Winton Avenue, and Clarence Road/Truro Road/Finsbury Gardens.
- 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 17 and 18 May 2021, the Council held online community design workshops for the proposed Bounds 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.
- 6.32 Based on feedback received at Engagement Stage 2, a third design option was developed including a greater element of filters allowing emergency and access for other permitted vehicles versus physical filters. This third design option was consulted on at Engagement Stage 3.

**Engagement Stage 3: Public Consultation**

How was consultation undertaken?

- 6.33 A public consultation on the proposed Bounds 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
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	FAQs
Social media	Twitter, facebook, instagram
Consultation leaflet	Sent to every address and available within local libraries
Haringey People Extra bulletin & Haringey Business Bulletin	LTN item included within email bulletins
Survey	Sent to every address (freepost return)  Could also be completed online, via phone, sent via email or completed in person and deposited at 5 of the borough's libraries
Accessible version of consultation leaflet and survey	Published on the council's website with paper copies available on request.
Translations	Consultation leaflet available on request in 4 commonly spoken languages
Specific stakeholder groups	Bespoke strategies used for specific groups. Detail set out in next section.
Consultation events	Street exhibition boards at Bounds Green Tube Station and Bowes Park Community Garden Pop-up exhibitions at Bounds Green Tube Station and Myddleton Road area Outside school engagement: Trinity Primary Academy and St Martin of Porres Schools
Posters/lamp columns	25 lamppost wraps and 100 posters were placed across the LTN area

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.

- **Schools:** Schools engagement was carried out in July 2021. A meeting was held for head teachers and a separate meeting was held for parents.
- **Businesses:** A Business Perception Survey was commissioned to help build up a picture of how customers and staff travel to business premises, alongside how they receive deliveries.
- **Enfield Council:** The proposed Bounds Green LTN is adjacent to the Bowes Primary Area Quieter Neighbourhood LTN which has been in operation by Enfield Council since September 2020. The Quieter Neighbourhood includes modal filters which prevent motor vehicles from passing through these filters but allow for walking and cycling. In recognition of the fact that the projects are very closely linked, the Council has worked closely with Enfield to align the proposals so that they are complementary to each other as a scheme that covers a wider area, rather than separate schemes within each local authority's boundary. This approach is consistent with the requirements of the network management duty under the Traffic Management Act 2004.

#### What was consulted on?

- 6.35 The Bounds Green LTN consultation option is set out in the consultation leaflet at Appendix G. The consultation option broke the LTN area into 3 sub-areas:
- Area A: Bounded by Bowes Road, the East Coast Main Line, Bounds Green Road and Telford Road
  - Area B: Bounded by the A406, Green Lanes/High Road, Bounds Green Road and the East Coast Main Line
  - Area C: Bounded by Bounds Green Road, Durnsford Road and Pinkham Way.
- 6.36 Parts of Areas A and B fell within the London Borough of Enfield with these areas forming part of the existing trial Bowes LTN within the London Borough of Enfield.
- 6.37 Within each area of the LTN in Haringey, filters were proposed on a trial basis to stop traffic travelling through the respective area from one boundary road to another boundary (i.e. rat-running). The filters were designed having regard to the existing Enfield LTN and with a view to creating a complete wider LTN.
- 6.38 A range of complementary measures were also proposed including:
- School Streets for Trinity Primary Academy (Area B) and St Martin of Porres Primary School (Area C) (on a trial basis)
  - Two new zebra crossings (permanent)

- Six new cycle hangars (permanent)

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

- 6.39 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."
- 6.40 As part of this duty, alongside the consultation option, the Council also published a high-level transport assessment (HLTA) for the proposed Bounds Green LTN. The HLTA (Appendix H) was undertaken to assess the potential impacts of the proposed Bounds Green LTN on the highway network. It treats the existing Bowes Quieter Neighbourhood and proposed Bounds Green LTN as a single LTN for this purpose. It shows that some boundary roads are likely to see decreases and some roads likely to see increases in traffic (0-25%), with all the internal roads expected to see a reduction or neutral impact as a result of the scheme. This is on the assumption all traffic reassigns onto the nearest available alternative route, which are the boundary roads on the edge of the LTN area. The upper limit of the predicted level of traffic displacement is not considered to be particularly problematic from the network management duty perspective.
- 6.41 Notwithstanding this conclusion, the HLTA points to analysis by Sustrans on 6 LTN trials across London that, after 6 months, significant change in travel patterns takes place. Sustrans data on 21 boundary roads indicates a mixed picture following LTN implementation. On average, daily traffic volumes on boundary roads increased by 3% compared to before the trial. In the worst case, daily traffic flow on one boundary road increased by 32%. In the best case, daily traffic flow on one boundary road saw a reduction of 31%.

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

- 6.42 The EqIA (Appendix I) assessed the likely impacts of the proposed Bounds 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 1,511 people responded to the consultation – 1,388 via the online survey and 123 via paper surveys. A copy of the survey is provided at Appendix J.
- 6.45 There were also 57 emails received providing feedback on the scheme. A consultation report is provided at Appendix K. A summary of respondents and responses is provided below.

#### *Respondents*

- 6.46 Based on post code data, 64% of participants live within the LTN area (42% in Haringey and 22% in Enfield), 5% live on boundary roads, 22% live outside the LTN area but within LB Haringey.
- 6.47 19% of the respondents said they have a physical or mental health condition/illness.
- 6.48 There are a number of ways in which the respondents were not representative of the area and this should be considered when interpreting results. For example, people who owned or had access to a car were significantly over-represented. Participants were asked if they owned or had access to a private car. 18% said “No” and 82% said “Yes”. In comparison, the 2011 census indicates 52% of households in Bounds Green ward, which covers the majority of the Haringey part of the proposed Bounds Green LTN, are without a car/motor vehicle.

#### *Feedback*

- 6.49 When asked how they felt about the reduction of traffic within the Bounds Green LTN area, 38% of respondents gave a positive response (569 people) but, despite the level of engagement undertaken in developing the arrangement suggested in the consultation, 55% responded negatively (828 people).
- 6.50 There was an overall negative response to changes proposed in each of the three areas within the Bounds Green LTN. (i.e. to the filters needed to deliver the Bounds Green LTN). 62% of responses regarding Area A were negative and 32% were positive; 65% of responses regarding Area B were negative and

30% were positive; and 66% of responses regarding Area C were negative and 29% were positive.

- 6.51 There was high positivity for the proposed complementary measures of crossings, School Streets and bike hangars.
- 6.52 The open text data provided key context around the reasons for overall negativity to the proposed Bounds Green LTN. The main reason people expressed negative views was increased traffic on main roads (324 comments), even though the high-level transport assessment indicates that even under the worst-case scenario the change is not expected to be particularly detrimental. That reason was followed by concerns around increased car journey times (232 comments) and increased air pollution (196 comments) – both of which would relate to journeys on the outskirts of rather than within the LTN areas themselves. While some people were opposed to the Bounds Green LTN, others supported the principles behind the Bounds Green LTN but did not think that it would work, particularly those living on the boundary roads.
- 6.53 There was a strong theme around equity, particularly 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.
- 6.54 Disabled respondents were less positive about the LTN and School Streets than non-disabled respondents. 70 responses were received to the Disabled People & Carers survey from people within the Bounds 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, impacted access to key places such as medical services, and impacted access for care givers. Various respondents indicated support for the Bounds Green LTN highlighting that the existing street landscape and traffic volumes had a negative impact on their mobility and suggesting the Bounds Green LTN would improve their mobility and open up routes for them to walk, cycle or use a wheelchair.
- 6.55 In terms of their relationship to the area, the more positive groups of respondents were those who don't live within the Bounds Green area but live within Haringey. The most negative were those who work in the Bounds Green area. Residents within the Bounds Green LTN in Enfield and Haringey had a similar pattern of response, although Haringey respondents were very slightly less positive.
- 6.56 People without access to a car were significantly more positive about the schemes than those with. Those without access to a car were underrepresented. Those who cycle 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.

#### *Responses from emergency services*

- 6.57 The Metropolitan Police responded stating it has no objection to the proposals. It asked whether the Council had considered the cumulative impact of the LTN alongside the neighbouring Bowes LTN in Enfield and it stated 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.
- 6.58 The London Fire Brigade expressed concerns about hard closures stating that an approach that does not require physical barriers would be advantageous. It said that more detail was required about layouts to ensure that it does not impede on its appliances.
- 6.59 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 requested changes to filters on Queen's Road (Area A), Truro Road (Area B) and Passmore Gardens (Area C).

#### *Responses from businesses*

- 6.60 123 responses were received across the borough to the 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.

- 6.61 When asked to select the top three means by which their staff currently travel to the business premises, the most common response was by car (36%), closely followed by public transport (32%). Another popular response by respondents on how they travel to the business premises was by walking (20%). In response to the question about how customers travel to the respondents' businesses, the most common response was by walking (32%), followed by car (29%), 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%).

#### *Petition*

- 6.62 As part of the consultation a petition was submitted to the Council by residents living within Area C of the LTN (Appendix L) setting out their opposition to the proposed LTN. Linked to the petition, a deputation was made to Cabinet on 14 September 2021. The written documentation indicated 94% of households in Area C that responded to the petition's survey oppose the proposed version of LTN. It stated that residents do not support a 24/7 closure of roads to local residents and proposed an alternative LTN which it claimed is overwhelmingly supported by the same residents. The alternative proposal was for timed cameras closing the area to all through traffic, including residents, at school times and other peak periods only and only on weekdays.

#### Summary of Council response to consultation

- 6.63 The proposed Bounds 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 Bounds Green LTN. The most common issue raised by respondents was 'Air Quality Concerns', followed by 'Traffic Congestion' and 'Traffic Volumes.' The most common suggested improvements from respondents was 'Reduce Traffic Volumes', followed by 'Measures to Improve Air Quality' and 'Reduce Traffic Speeds.' Having regard to this feedback, 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. Based on feedback received

at Engagement Stage 2 a preferred design option was developed including a greater element of filters accessible by emergency services or other permission vehicles versus physical filters. This 'hybrid option' was the subject of public consultation as part of Engagement Stage 3.

- 6.64 It is noted that there was an overall negative response to changes proposed in each of the three areas within the Bounds Green LTN. However, it is important that this headline result is properly scrutinised and the reasons for opposition are unpacked. In the first instance, people without access to a car were significantly underrepresented within respondents. Such people were found to be much more positive about the Bounds Green LTN than those who own or have access to a car.
- 6.65 Negative responses received to the public consultation included in-principle objections to the Bounds Green LTN and objections based on concerns with the specific design of the Bounds Green LTN and the possibility it would not achieve the desired objectives. In the latter case, the main concerns expressed regarding the implementation of the Bounds Green LTN were increased traffic on main roads, increased car journey times and increased air pollution. The ultimate goal of the Bounds Green LTN is to reduce traffic both within the Bounds Green LTN and on the boundary roads of the Bounds Green LTN. Data from trial LTNs implemented in boroughs such as Hackney, Lambeth and Islington has shown a mixed picture. Traffic volumes within the LTNs reduce 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 Bounds 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.
- 6.66 The petition submitted by residents of Area C of the LTN is noted, specifically opposition to the LTN consultation option and support for an alternate option comprising timed cameras closing the area to all through traffic, including residents, at school times and other peak periods only and only on weekdays. The alternate option is not supported by the Council because the consequential change in behaviour could simply be a shift in commuting travel times (i.e. to off-peak), it will not reduce existing levels of non-local through-traffic (i.e. off-

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<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)

peak rat-running) and it does not encourage the shift to walking, cycling and other sustainable modes of transport. Furthermore, there are spikes in traffic flows that occur outside of peak hours which, combined with the timed approach that applies to School Streets, would make general understanding of the hours of operation of any LTN extremely challenging to understand. These factors would inhibit the introduction of any time-based LTN.

### **Conclusion**

- 6.67 It is not possible to predict exactly what the impacts of the proposed Bounds Green LTN will be. From a network management duty perspective, the implementation of the Bounds Green LTN is not considered to have a particularly negative impact in the short, medium or long-term on the expeditious movement of traffic in any or of all three areas or to its boundary roads. Initially, there will be a period of adjustment of traffic routes selected by motorised vehicle users that can no longer cut through the Bounds Green LTN, resulting in a stabilisation of traffic movements and route selection that will be of broader benefit to the residents of the Bounds Green LTN than simply reduced flows passing their property.
- 6.68 Taking account of evidence from schemes delivered elsewhere in London, it is not considered the Bounds Green LTN will give rise to the main concerns which are responsible for most of the opposition expressed through the public consultation namely increased traffic on main roads, increased car journey times and increased air pollution.
- 6.69 Having regard to the potential for the Bounds Green 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 can make changes to while it is in force to address or mitigate some of the issues arising that affects the highway network or local amenities and with a linked commitment to comprehensive monitoring to be set out in a detailed monitoring proposal document. Having regard to public support for the suggested complementary measures as well as their potential to support the Council's aims for the LTN and wider area, it is also recommended to introduce the complementary measures. Monitoring will be established before the 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 within the Bounds Green LTN, on major boundary roads and elsewhere at key locations on the borough's road network.

6.70 Having regard to consultation feedback and further dialogue with key stakeholders, changes are proposed to the experimental Bounds 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
Bounds Green LTN Area A	None	N/A
Bounds Green LTN Area B	West side of Trinity Primary Academy School Street removed, east side retained	To prioritise the eastern section of Trinity Road where the school is located, allowing the west side to be accessed by motor vehicle for those who need to arrive by motor vehicle. West side may be introduced at a later date, subject to monitoring.
	Clarence Road between Truro Rd and Nightingale Rd to remain two way but at both ends to be signed as No Motor Vehicle with an Except for access plate, retaining access for emergency services.	This section of Clarence Road is too narrow to accommodate large vehicles once Truro Road and Nightingale Road filters are implemented. The proposed change protects the road from being used by motor vehicles simply as a through route whilst allowing access to residents who reside along it.
	Cycle hangar on Thorold Road moved across the street	Alternative location chosen due to potential for a disabled parking bay at original location.
	Marlborough Road filter moved to junction and changed to emergency access filter	In response to emergency services request, to support place function and to support refuse access
	Zebra crossing on Green lanes north of junction with Myddleton Road no longer proposed. Instead a signalised crossing for pedestrians to be considered in its place or at just north of junction with Sidney road	There is not sufficient space on the carriageway to accommodate a central island which is necessary for safety. Due to the presence of bus stops and or bus lanes which may impede on sightlines, a signalised crossing is more appropriate. The exact location to be determined following feasibility study and approval from TfL.
Bounds Green LTN Area C	None*	N/A

	<p>*The St Martin of Porres Primary School Street will need to be shortened to only cover Blake Rd from Churston Gardens at the northern end if Cabinet does not approve the Bounds Green LTN filters within Area C.</p>	
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- 6.71 After the consultation closed the Council met with the emergency services to discuss their responses. As a result of this discussion the Marlborough Road filter within Bounds Green Area B was relocated and changed from a physical filter to an emergency access filter.
- 6.72 A plan of the experimental Bounds Green LTN, School Streets and other complementary measures proposed for implementation is provided at Appendix M.

### Exemptions

- 6.73 Where roads are closed with a physical barrier, whether through use of planters, bollard, etc, no exemptions are possible for any motor vehicle. However, where they are signed as closed to motor traffic but not physically closed, the experimental traffic management order for the LTN will exempt all emergency vehicles and the Council's refuse services. These closures will likely be enforced by CCTV cameras.
- 6.74 Meeting the needs of those with access and disability needs has been an important part of the Bounds 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 Bounds Green LTN, including the types/locations of filters and the locations of the new pedestrian crossings.
- 6.75 The EqlA (Appendix I) assessed the likely impacts of the consultation version of Bounds 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.
- 6.76 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

Bounds Green LTN. The proposed Bounds 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.

- 6.77 On the basis of the above, and to ensure the Bounds Green LTN advances equality as far as possible, it is recommended that the following will be eligible for an exemption to non-hard closure filters in the Bounds Green LTN experimental scheme:
- Blue Badge holders living within the Bounds Green LTN or on the immediate boundary of it
  - Special Educational Needs and Disabilities (SEND) transport
  - Essential Haringey Council services catering for people with a disability
- 6.78 This is a carefully balanced recommendation taking into consideration the reasonable adjustments that this approach will offer to Blue Badge holders and others with access and disability needs.
- 6.79 The exemptions will be subject to an application process and exact criteria will follow in due course.
- 6.80 There will also be a separate route for individuals who do not live within the LTN or on the immediate boundary of it to obtain an exemption to drive through a designated filter, through an exceptional circumstance dispensation.
- 6.81 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.
- 6.82 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 Bounds 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.
- 6.83 The Council will closely monitor the impacts of the trial Bounds 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**

- 6.84 The Council has prepared an updated EqIA in respect of the Bounds Green LTN, School Streets and other complementary measures proposed for implementation. This is provided at Appendix N. 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 LTN and complementary proposals, making certain groups and categories of transport exempt from the some of the restrictions, and further engagement with some residents and/or their representative groups.

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

- 6.85 The Bounds 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.
- 6.86 There are 3 types of traffic management orders:
- permanent
  - experimental
  - temporary
- 6.87 The Bounds Green LTN and School Streets are proposed to be implemented via experimental traffic management orders:
- 6.88 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.

- 6.89 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.
- 6.90 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.
- 6.91 Notwithstanding the above, it should be noted that it will not be possible to resolve all issues which arise whilst the experimental measures are in place. In the first instance, it will be necessary for the Council to allow a 'settling-in' period for drivers to adjust their travel behaviour in response to the new highway arrangement. In the second instance, the Council will be limited in terms of what changes it can make and the scope of potential changes will likely only extend to slight adjustments to deal with minor localised issues. Lastly, it will not be possible to make immediate changes and, depending upon the nature of any changes required, these could take some time to implement. This is because any significant changes will require a revised experimental traffic management order and mean that the period of the experiment starts afresh. For this reason, it would not be prudent to consider any significant changes to the ETMO for the LTN for at least two months, given that it will take time for altered traffic behaviour and route selection to stabilise.
- 6.92 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.
- 6.93 The proposed bike hangars will be implemented by exercising powers under section 63 of the Road Traffic Regulation Act 1984.
- 6.94 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**

- 6.95 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. As a consequence, the

Bounds Green LTN is programmed to be the first LTN delivered by the Council. Separate Cabinet reports have been prepared for December 2021 Cabinet recommending the subsequent implementation of Bruce Grove West Green LTN and St Ann's LTN as part of the Council's wider LTN delivery programme.

6.96 Implementation of the Bounds Green LTN and complementary measures is expected from January 2022.

6.97 The next steps for the Bounds Green LTN and complementary measures are as follows:

**December 2021: Update**

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

**Early 2022: Trial implementation of LTN and School Streets and implementation of additional complementary measures**

- Modal filters and School Street proposals implemented as trial changes under experimental traffic management orders
- Start of related 6 months' statutory objection periods for LTN and School Streets (Engagement Stage 4)
- Cycle hangars and new crossings implemented as permanent measures

**Autumn 2021 – Winter 2022: Monitoring**

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

**Autumn 2022: Review**

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

**Winter 2022: Decision**

- Decision on whether to make the trial changes permanent.

**Winter 2022: 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 Bounds 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 CO2 by 40% before 2020 and begin the journey to reduce to zero by 2050
- provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users
- improve connectivity around the borough especially for pedestrians and cyclists

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

## 8 Statutory Officers comments

### Finance

8.1 The report requests Cabinet to approve the recommendations as set out in Section 3 of this report.

8.2 TfL have allocated £1.793m for three LTN schemes, including for School Streets, cycle hangars, and transport modelling. The funding of the Bounds Green LTN, School Streets and bike hangers and crossings is set out in the table below:

Item for delivery	Estimated cost	Funding source	Funding status
Bounds Green LTN	£489k	£240k Tranche 2 DfT Funding + Highways capital	Fully funded
School Streets	£150k	£184k Tranche 3 TfL funding	Fully funded
Bike hangars	£36k	£24k Tranche 3 TfL Funding + Strategic CIL	Fully funded
Crossings	£70k	Strategic CIL	Fully funded

8.3 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

8.4 N/A

### **Legal**

- 8.5 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.
- 8.6 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.
- 8.7 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 ("ETMOs"), 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.
- 8.8 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.
- 8.9 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"
- 8.10 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.

- 8.11 The procedures that must be followed before making a traffic management 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.
- 8.12 There is no requirement to consult the general public before an ETMO is made like there is for a TMO, but where the ETMO 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.
- 8.13 An ETMO must be genuinely experimental in nature - an operation designed to glean information about the workings of a scheme in practice.
- 8.14 Although there is no statutory requirement to consult the general public before making an ETMO 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.
- 8.15 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.
- 8.16 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.

- 8.17 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.
- 8.18 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**

- 8.19 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.
- 8.20 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.
- 8.21 The proposed scheme has been assessed via a comprehensive Equalities Impact Assessment (Appendix M). A 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</p>

	<p>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 location of a bike hangar and an exemption to the LTN for blue badge holders living in the LTN area and on the immediate boundary of it.</p>
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</p>

	<p>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	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.
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.

8.22 Over the period in which the proposals for the LTN and complementary measures have been developed a variety of measures have been taken to ensure that the Public Sector Equality Duty has been met including an iterative EqIA. The Council has engaged extensively with stakeholders to ensure that the potential impacts of the emerging proposals on groups with protected characteristics are fully understood. Where potential negative impacts have been identified, steps have been taken to mitigate these and to ensure that as far as possible the proposals advance equality. Input of stakeholders fed into early design work and following further engagement and public consultation 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: Bounds Green LTN funding bid

Appendix D: Bounds 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: Petition for Bounds Green Area C

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

Appendix N: Updated EQIA

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

None

