

Equality Impact Assessment

Bruce Grove West Green Low Traffic Neighbourhood

Introduction

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

People walking in London's most deprived areas are more than twice as likely to be injured by a motor vehicle as those in the least deprived areas. People aged between 20 and 29 years old are more likely to be killed or seriously injured than those in other age groups and the number of children killed or seriously injured in cars increased as recently as 2016¹. Black, Asian, and non-white Londoners are more at risk from motor vehicle injury, with children in this group being on average 1.5 times more likely to be killed or seriously injured on the roads than white children¹.

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

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

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

includes those fitted to electrically powered motor vehicles). In 71% of UK towns and cities, children are breathing unsafe levels of air pollution³.

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

Equality Impact Assessment

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

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

- Age
- Disability
- Sex or gender
- Gender reassignment
- Marriage and civil partnership
- Religion or belief
- Race

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

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

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

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

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

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

- Sexual orientation
- Pregnancy and maternity

It may also be appropriate to consider the impact of the proposal on other groups not protected under the Equality Act including parents/carers and/or socio-economic groups. Haringey Council intend to adopt socio-economic status as a local protected characteristic to inform future policy making⁸.

An Iterative Approach

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

Public Engagement Timeline

Engagement Stage 1 – Early Engagement

- February 2021 – Perception survey for residents of all three LTN project areas (Stage 1 Engagement)
- March 2021 – Online public briefings for each project area
- May 2021 – Stakeholder mapping exercise begun with focus on local groups representing those with protected characteristics (see appendix)

Engagement stage 2 – Community design Workshops

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

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

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

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

Engagement Stage 3 – Public consultation

- August 2021 September – Public consultation (Stage 3 Engagement). All postal addresses written to with details of proposals and survey. This will include translation offer and accessible format options
- August-September 2021 - On-street pop-up (informal) engagement, evenings and weekends
- August-September 2021 - On-street engagement outside school sites to hear from children, parents and carers during consultation period
- August-September 2021 - Face to face visits with local businesses
- September 2021 – Online meeting with local schools
- November 2021 – Online meeting with residents who are disabled or carers

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

Perception Survey Results

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

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

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

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

Public Consultation Results

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

- In total 1,221 people responded to the consultation – 1,121 via the online portal and 100 via paper surveys
- The majority of responses were from residents in the Bounds Green area. Most respondents not in the Bruce Grove West Green LTN area visit friends, family, or businesses in the area.
- While the survey was filled in by a range of respondents, responses are not representative of the population of the area. Consultation results should be understood within this context.
- Groups that are overrepresented in the survey include: those with access to a private car; those identifying as “White”; and women. The most common age group were those aged 35-44, 45-54 and 25-34. The number of people who said they had a disability and/or a long term illness is roughly in line with national averages.
- Respondents were asked how they felt about LB Haringey proposing to reduced motor vehicle traffic in the Bruce Grove West Green LTN: 36% selected “1 – Negative”, and 6% selected “2”. 4% selected “3”. 5% selected “4” and 47% selected “5 – Positive”.
- Respondents were also asked about the changes being proposed in the two consultation areas. There were similar patterns of responses to these, with between 44%-46% selecting “1-Negative” and between 38%-41% selecting “5-Positive”. Those selecting “2”, “3”, “4”, or “I don’t know” were each 6% or under respectively.
- There was high levels of positivity for the proposed crossings and School Streets.
- The main reasons people gave for negativity around the proposed changes included:
 - Concerns around the impact on congestion and traffic volumes on main roads in the area
 - Concerns around increased car journey times

- Linked to both these points, people raised concerns around the impact on air quality in the area and raised concerns around the equity of the LTN for those living on main roads
 - The impact of increased traffic on road safety
 - Other less common reasons people gave included concerns around access to houses and/or local amenities, personal security on quieter roads, and accessibility of emergency services
- Respondents with a physical or mental health condition/illness were more negative about the proposals than those without.
 - Disabled respondents and carers in the area gave similar reasons for being negative about the schemes to overall responses. However, many of them linked their concerns to their disability – e.g. longer journeys to health services, the ability of carers to meet appointments, being unable to walk or cycle places due to a disability/health issue.
 - Generally older people, and 16-24 year olds, were less positive about the proposed changes than 25-44 year olds.
 - Women were less positive about the proposed changes than men.

The Bruce Grove West Green LTN consultation report contains a more detailed breakdown of the consultation results.

Disabled Residents and Carers Survey

A survey for disabled residents and/or carers in the LTN area was developed to explore some of the specific needs and suggestions from these groups. 61 responses were received from those in the Bruce Grove/West Green area. Of the 61 respondents, 46 left comments.

Of those who responded

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

The most common locations that people required access to included:

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

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

The key issues raised about the LTN included:

- Concerns about longer journey times (13 comments)
- Often linked to an increase in journey times were concerns around the impact of LTNs on main roads (12 comments)
- Many comments also said that the LTN would block access to key places, such as homes or services (6 comments)
- There were also concerns that carers would no longer be able to access those they care for. These related to both professional carers and those caring for relatives/friends (10 comments)
- A number of the above comments also stated that they were unable to walk, cycle or take public transport as an alternative to using their car (3 comments)
- Other key issues raised included concerns about air pollution (4 comments) and general disagreement with the scheme (5 comments)

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

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

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

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

- The most common of these was around improving the consultation (20 comments). These comments related to: ensuring that disabled voices are listened to; improving communications (many had not heard much about the consultation), including mail-outs that specifically target disabled people; include disabled people earlier in the consultation; and consider specific needs of disabled people in material (not just images; braille etc.)
- There were some specific comments about physical changes, including providing disabled/carers exemption (4 comments), scrap the scheme altogether (3 comments), and expand the schemes (1 comment).

Reviewing Research

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

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

Why do we need Low Traffic Neighbourhoods (LTNs)?

According to Department for Transport data, between 2010 and 2019, the number of miles driven on Haringey's roads increased by 73,000,000¹³. With 57% of Haringey households having no access to a private car or van at last census¹⁴, enabling more affordable and sustainable transport for short trips is essential to improving air quality, reducing road danger and managing motor traffic congestion. Whilst motorised transport has provided some benefits to society, the costs are high and often born by those who benefit the least. Increasing motor traffic dependency has led to a raft of damaging outcomes including physical inactivity, community severance, air pollution, social isolation and a collapse in childhood freedom¹⁵. Over the decades, urban minor roads (often referred to as side roads or back streets) have become little more than short-cuts for motor traffic, a situation exacerbated by the upturn in use of in-car satellite navigation technology (sat-navs). Sat-navs have enabled drivers to choose minor roads to bypass congestion and queues on main routes especially around signalised junctions¹⁶.

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

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

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

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

¹⁵ Working Together to Promote Active Travel

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf

¹⁶ DfT Road Traffic Estimates 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/916749/road-traffic-estimates-in-great-britain-2019.pdf

Streets welcoming to walking, wheeling and cycling

The LTN approach aims to restore urban minor roads to their original low-traffic, resident oriented status by removing through motor traffic. Evidence of the success of this approach continues to emerge from other London boroughs¹⁷, with fresh data showing overall motor traffic reductions, increased walking rates and reductions in crime. The project will introduce motor vehicle access changes to minor roads across the project area in order to achieve a wholesale reduction in the number of motor vehicles movements. Residents will retain access to their homes in their cars. This will in turn greatly increase the overall number of streets which are attractive to walking, wheeling and cycling, with associated improvements for public health and community cohesion¹⁸. Over time, fewer short, driven trips will be made, reducing congestion on main routes benefitting bus users and other essential services.

Key outcomes for an LTN project

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

LTNs introduce greater priority for pedestrians on minor roads and enable more cycling for local trips, further serving to reduce pressure on public transport. Haringey's LTN designs ensure all properties and addresses remain accessible by motor vehicle, however, routing may change for some trips depending on destination. The shortest driven trips will not be impossible however they may become less convenient effectively nudging those who can to walk, wheel or cycle more often. This also applies to bus services using the minor road network, as such as the W4 service. There is potential for local people and local businesses to make use of spaces reclaimed from fast moving motor vehicles, for informal gatherings of neighbours and for children to experience a restored freedom too.

What is a Modal Filter?

As part of the LTN, 'Modal Filters' will be introduced to a limited number of streets within the project area, maintaining access for residents but limiting vehicle movements to those that require access to addresses within the project area i.e. access-only streets. Modal filters

¹⁷ St Peter's People Friendly Streets trial, Results from 6 month monitoring report (Islington)
<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/transportandinfrastructure/information/adviceandinformation/20202021/20210310stpeterspeoplefriendlystreetinterimmonitoringreport.pdf>

¹⁸ Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol UK
<https://uwe-repository.worktribe.com/output/968892>

have been in use across London for decades and examples can be found in and close to the project area. Modal Filters in this case will be a mix of physical bollards or planters and camera-controlled locations as agreed with the emergency services.

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

Evidence and Assessments

This assessment benefits from the research data presented in Transport for London's (TfL) 'Travel in London: Understanding our diverse communities' report which was updated in 2019, so for any references in this section without footnotes please refer to this document¹⁹. The report was commissioned by TfL to identify the barriers faced by London's diverse communities when accessing transport.

London of Borough of Haringey

Haringey's residents are highly diverse and the 'State of the Borough' profile²⁰ released in April 2021 helps us to understand the community better. During the Covid-19 lockdown in 2020, TfL calculated that Haringey had the potential to see a 57% increase in motor vehicle trips if owners switched public transport trips to driving following the first lockdown¹⁷. An increase in traffic of that magnitude would lead to unacceptable delays to emergency and essential services in Haringey, as well as delays to those who rely on motor vehicles for

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

²⁰ Haringey at a Glance – State of the Borough
https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

mobility and would likely be damaging to the local economy too. As such, LTNs enable alternatives to short, driven trips.

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

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

Bruce Grove ward’s overall population spread mirrors that seen in Haringey more widely, with those aged 20-44 making up the largest proportion of residents (41.2%), and those aged 65+ making up the smallest proportion (9.1%). However, while following the wider borough pattern, the 65+ population is particularly under-represented in Bruce Grove²¹. West Green ward’s overall population spread again mirrors that seen in Haringey more widely, with no age group particularly over-represented or under-represented in the ward²².

What we know about young people

- There are 56,718 children in Haringey aged 0-17 years, representing 21% of the population.
- More 11-17 year olds walk to school in Haringey than in any other London borough (64% mode share)²³
- In Haringey, 3.3 times more primary school children walk to school than are driven to school¹³
- Walking is the most commonly used mode of transport by younger Londoners (97% of those aged 24 and under walk at least once a week compared with 95% all Londoners)
- Air pollution disproportionately impacts on children living in deprived parts of Haringey²⁴. In actual fact, the 20% most deprived areas in London had 8.6% more PM10 and 8.1% more NOx compared to the 20% least deprived areas

Schools in Bruce Grove West Green project area

²¹ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bruce_grove.pdf

²² https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_west_green.pdf

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

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

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

Schools within walking distance of project boundary:

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

Assessment

The travel mode of children has changed significantly over the last 30 years, with rates of active travel amongst children collapsing and associated health inequalities soaring. Despite this walking is still the most frequent travel mode for young people in Haringey. Research shows that LTN's implemented in London in 2020 have cut motor traffic related injuries by half²⁵ with particular benefits for walking trips. With 21% of Haringey being aged 17 or under, this is a group that can be particularly affected by changes to street space. Up until secondary school age, to larger extent, parents determine how children travel and as such may restrict children from being active due to perception of danger from sources such as motor traffic.

Road Danger - Data shows that for each mile driven on a minor urban road, results in 17% more killed or seriously injured pedestrians than a mile driven on an urban A road²⁶. As LTNs specifically target through motor traffic on minor roads, this design approach particularly benefits younger people as they walk often and leaving more vulnerable to danger posed by motor vehicles on minor roads. In addition, perceptions of road danger have a significant impact on parental decision-making around how children travel but also their freedom to roam

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

²⁶ Motor traffic on urban minor and major roads: impacts on pedestrian and cyclist injuries
<https://www.icevirtuallibrary.com/doi/full/10.1680/jmuen.16.00068>

in general. Road danger can be quantified in terms of numbers of collisions on the street, whilst perceived levels of road danger are based on the observations of individuals and their own experiences such as near misses whilst crossing the road and volumes of motor traffic on streets without crossings and with poor sightlines.

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

Air Pollution - Air pollution particularly impacts on children living in deprived areas. Evidence shows that the 20% most deprived areas in London had 8.6% more PM10 and 8.1% more NOx compared to the 20% least deprived areas. Bruce Grove and West Green both sit within the top 25% of most deprived wards in London²⁷. Research in boroughs who have introduced wide-spread measures to enable active travel including LTNs shows that significant increases in air quality can be expected²⁸.

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

Traffic Reduction - When an LTN is introduced evidence shows that overall traffic volumes fall in the longer term within the LTN²⁹. However, in the very short term, there may be some increase in driver queues at some main road junctions at certain times of the day. This may initially lead to intermittent delays to bus services, which could impact on young people travelling. Longer term, evidence from other LTN schemes across London shows differential

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

²⁸ https://www.walthamforest.gov.uk/sites/default/files/WalthamForest_Kings%20Report_310718.pdf

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

impacts³⁰. The impact on the project area is unknown at this stage and will be subject to ongoing monitoring in order to inform implementation.

Mitigation

School leaders are key stakeholders and the delivery team have met with them on several occasions so far ensuring communication channels are open as early as possible. During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. A programme of ongoing monitoring of Haringey LTN projects has been developed (including looking at overall traffic volumes and air quality) and this vital to inform the development of specific impact mitigations where necessary. The Council will also be offering an exemption to SEN³¹ transport vehicles through some of the LTN filters (e.g. those which are not subject to a hard closure).

Update November 2021

- The council have met with all schools in the project area to answer and respond to questions and address concerns about the LTN. Schools have notified us that they are in principle, supportive of the LTN and its objectives.
- After engagement with the Grove School, the school street proposed here will not be implemented. The school have informed us that as a school for children with special educational needs that parents need access to the school gate at pick up and drop off times. We have also revised the design of Bruce Grove West Green Area B to allow parents to access the Grove School from Belmont Road
- After engagement with the Belmont Junior School, we are proposing to modify the school street proposed here. A smaller area of Rusper Road will be subject to school street restrictions than initially proposed.
- After engagement with Belmont infant School, a redesign of Bruce Grove West Green Area B has proposed a new Physical Filter on Hawke Park Road between boundary and Sirdar Road. This will provide a new walking route to the school
- SEN transport vehicles will be eligible for an exemption which will enable them to access to some of the LTN filters (e.g. those which are not subject to a hard closure).

³⁰ https://www.haringey.gov.uk/sites/haringeygovuk/files/bruce_ta_0.pdf

³¹ The term 'Special Educational Needs' or 'SEN' is used to describe learning difficulties or disabilities that make it harder for children to learn than most children

What we know about older People

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

Assessment

Whilst walking is the most frequently used mode of Londoner's aged 65 and over³², this assessment recognises that distances people can walk or cycle tend to reduce in the later years of life. Despite the project areas having a low proportion of residents aged over 65, this is still an issue that must be considered. Older people may find it difficult undertaking short distances on foot or using public transport, due to impaired mobility and/or poorly maintained footways.

Walking trips are common for older people in London, however some may be dependent on motor vehicles for longer trips such as visits to healthcare providers such as the NHS Mobility Solution Centre (MSSC) on Edwards Drive N11. Schemes which change motor vehicle access could have a negative impact on this group such as increased journey times under peak flows or disruption for roadworks or collisions on main routes. However, in the proposed Haringey LTN designs, all local amenities and homes do remain accessible by motor vehicle, although some rerouting may be required depending on origin or destination.

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

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

The UK national census asks people if they have a long term disability that impacts on their daily lives as a proxy for assessing disability rates in the population. We are still awaiting the

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

data for the 2021 Census but 2011 census data shows that 14% of Haringey residents reported a long term health problem that limits their day to day activity, lower than England but in line with London³³. For Bruce Grove ward, it is slightly higher, at 15.1%, and for West Green ward, the figure is higher still, at 16.2%, This is higher than both the Haringey and London average. Similarly, 5.7% of Haringey residents report being in bad health, slightly higher than England and London.

What we know about disabled people

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

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

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

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

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

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

³³ https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf

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

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

Assessment

According to analysis of the UK's National Travel Survey, disabled people are five times more likely to be injured as a pedestrian than non-disabled people – reporting 22 motor vehicle injuries per million miles walked, compared to 4.8 among pedestrians without a disability. LTNs create many more 'low road danger' streets and easier crossing which particularly benefits high risk groups like disabled people³⁴. Whilst the most frequent mode of travel reported by disabled Londoners is walking, it must be recognised that for some, travelling actively may pose a significant challenge due to lack of specialist equipment (often costly), or being discouraged by stigma. For people with mobility-related or visual impairments the quality and design of the built environment can have a considerable impact on both sense of freedom but also on mental health and wellbeing. Intuitive street layouts, places to rest, formal crossings and smooth, wide footway are essential if we are to better include everyone in public life. Improved drop-kerbs, new formal crossings and removal of street obstacles should be considered as part of a low traffic neighbourhood type project. The RNIB report

³⁴ Disabled and low-income pedestrians at 'higher risk of road injury' <https://roadsafetygb.org.uk/news/disabled-and-low-income-pedestrians-at-higher-risk-of-road-injury>

that walking is the main mode of travel for blind and partially sighted people, many of whom who will have fewer transport options available to them than others³⁵.

It is also important to recognise that formal crossings (e.g. zebra) are generally only necessary where motor traffic flows are high relative for the street type so, for some users, converting a street to access-only may allow a safe crossing experience without expensive infrastructure, due to very low vehicle flows. 90.2% of low income Outer Londoners live on minor roads³⁶ but many are less than accessible due, in part, to through motor traffic often travelling at speeds inappropriate to the street environment.

Mitigation

The Council has been developing a relationship with Disability Action Haringey (DAH) and they have been key in bringing in other stakeholders to feed into project development. We recently completed a 'roll-around' audit of the area with mobility aid users who provided feedback around footway hazards, personal security and general accessibility around minor roads. Two new controlled crossings will be introduced as part of the Bruce Grove West Green LTN, on Bruce Grove and Belmont Road.

During the LTN trial the Council will continue to engage with residents and direct them to advice and information where necessary. Meeting the needs of those with access and disability needs, and their carers, has been an important part of the LTN design process. Hearing the views from the community on these issues at online workshops, through the Disabled People and Carers survey and the public consultation has helped shape the design of the LTN including the types/locations of filters, the locations of the new pedestrian crossings and the decision to allow emergency vehicle access through camera enforced filters which significantly outnumber the physical closures across the LTN. The Council will be offering exemptions for all blue badge holders³⁷ living in the LTN area and on the immediate boundary of it which will enable them to access to some of the LTN filters (e.g. those which are not subject to a hard closure).

An application process to apply for the exemption will be introduced and this will set the criteria for eligibility This exemption will not apply to School Street filters which are subject to a separate exemptions policy³⁸.

³⁵ RNIB Travel Transport and Mobility <https://www.rnib.org.uk/knowledge-and-research-hub/research-reports/travel-mobility-and-living-skills-research/travel-transport-mobility>

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

³⁷ A Blue Badge is a parking permit that helps people with enduring and substantial mobility problems and/or non-visible (hidden) disabilities to access goods and services, by allowing them to park close to their destination.

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

Update November 2021

- Haringey have invited all respondents to the disabled residents and carers survey to attend a further public meeting on the Haringey LTNs on Thursday 25 November 2021
- Pembury Road filter to change from physical to emergency access filter because of a specific request from the emergency services. This will allow access to residents in need, including those with disabilities.
- Blue Badge holders living in the LTN or on the immediate boundary of it will be eligible for an exemption which will enable them to access some of the LTN filters (e.g. those which are not subject to a hard closure).

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

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

What we know about ethnicity

- Bruce Grove has a significantly higher proportion of residents whose ethnicity is Black (31.9%), compared to the wider Haringey population (18.8%). This is the major ethnic group in Bruce Grove³⁹, whereas West Green largely follows the ethnicity pattern seen in Haringey more widely, with the exception that the White British ethnic group is the third largest ethnic group (while it is usually the largest). 21.7% of West Green residents are of White British ethnicity, compared to 34.7% in Haringey⁴⁰.
- Walking is the most used type of transport by Black, Asian and non-white Londoners. (96% of Black, Asian, and non-white Londoners walk at least once a week compared with 95% of white Londoners.)

³⁹ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bruce_grove.pdf

⁴⁰ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_west_green.pdf

- Black, Asian, and non-white Londoners are more at risk from motor vehicle injury, with children in this group being on average 1.5 times more likely to be killed or seriously injured on the roads than white children⁴¹.
- Analysis in 2020 shows that in Outer London 92.5% of white Londoners live on minor roads compared to 90.6% of black Londoners. Data also shows 88.7 of Asian Londoners and 88.2 of diverse ethnic groups live on minor roads⁴²
- The use of cars among black, Asian, and non-white Londoners is lower than for white Londoners; 32% of black, Asian, and non-white Londoners drive a car at least once a week compared with 41% of white Londoners (33% and 43% respectively in 2013/14).
- Driving a car is higher among Asian Londoners compared with other non-white groups: 36% of Asian Londoners drive a car at least once a week compared with 27% of black Londoners (39% and 28% respectively in 2013/14).
- Cycling levels amongst black, Asian, and non-white Londoners and white Londoners are very similar. 17% of black, Asian and non-white Londoners cycle in London at least sometimes compared with 18 % of white Londoners, in line with the proportions observed in November 2014 (18% and 17% respectively).

Assessment

With a high proportion of black, Asian and non-white Londoners residents making sustainable journeys (walking and bus trips), the reductions in road danger and increased pedestrian priority associated with LTN projects will provide conditions that broadly benefit these groups. Black, Asian, and non-white Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads⁴³. When we significantly increase the number of minor roads with infrequent motor vehicles movements it is likely to benefit these groups and lead to changes in desirable changes in behavior. Furthermore, Black, Asian and ethnically diverse Londoners are also less likely than white Londoners to say that they feel safe from road collisions when walking around London at night (60% Black, Asian and ethnically diverse people compared with 74% white). In the perception survey (February 2021) residents reported high rates of speeding drivers on minor roads and removing through traffic will help to change perceptions of danger and enable more walking, wheeling and cycling for the shortest trips.

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

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

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

Mitigation

Initial mitigations for these risks include the Council's extensive programme of written communications, public and stakeholder engagement and surveys which began in February 2021 with the perception survey. The engagement programme has been designed to bring residents along on the journey to towards more inclusive and attractive streets space in Haringey. Established community groups and organisations representing different ethnic communities have been contacted and invited to participate in the various stages of engagement. If requested, smaller feedback and discussion sessions can be facilitated with groups that have English as a second language to ensure communication is clear.

Over 180 languages are spoken by Haringey residents. 30% of Haringey residents do not speak English as their main language. This is the 6th highest rate in London and is above the statistical neighbour and London averages. Of those whose main language is not English in Haringey, one in four (24%) either do not speak English well, or do not speak it at all. This is the third largest proportion of all London boroughs, and is above the statistical neighbour and London levels as reported in Haringey at a glance⁴⁴.

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

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

Update November 2021

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

Gender

In London, the key demographic differences between women and men are employment status and household income. 37% of women are not working or are retired, with a further 14% employed part-time (compared to 21% and 6% of men respectively). Women are also more likely to be the primary carer of children at home including accompanying younger children to school. Both factors appear to influence the travel behaviour and attitudes of

⁴⁴ https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

women in London. In transport terms, women make a greater number of journeys per weekday than men. Trips made by women tend to be shorter according to Transport for London data⁴⁵.

- Walking is the most commonly used type of transport by women (95% walk at least once a week).
- Women are more likely to use buses than men (62% compared with 56%), but are less likely to use other types of transport including the Tube (38% women compared with 43% men)
- Women are less likely than men to drive at least once a week (33% compared with 42%). However, they are more likely to be a car passenger (51% compared with 37% of men)
- Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices³¹
- Women are more likely than men to experience worrying incidents when travelling on public transport and are more likely to be deterred from using public transport more often by a number of different barriers including harassment⁴⁶
- A higher proportion of journeys made by women are for shopping/personal business than men (25% compared with 18%)
- Women are less likely than men to be employed full or part-time, and this is reflected in the smaller proportion of journeys that are made for work purposes (25% compared with 38%)

The experience of women whilst travelling in London

14% of women report experiencing some form of unwanted sexual behaviour while travelling in London in the previous year (the equivalent figure for men is 6%)⁴⁷. Furthermore, 41% of women who experienced an incident of unwanted sexual behaviour did not report it because they felt it was not serious enough³². Women cycling have reported experiencing a particular kind of harassment from other road users: that of a sexual nature, and sexist harassment stemming from indignation that a cyclist – and a female cyclist at that, doubly vulnerable and bold – is daring to get in the way of a driver⁴⁸. The experience of female cyclists facing

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

⁴⁶ Most women have been harassed on public transport <https://yougov.co.uk/topics/legal/articles-reports/2020/01/22/most-women-have-been-sexually-harassed-london-publ>

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

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

disproportionate harassment and bad driving was proven in research by University of Westminster⁴⁹. That women were almost twice as likely as men to be subjected to frightening 'near miss' incidents whilst cycling seemed mainly linked to the lower average speed reported by female respondents, compared with the men who took part.

Assessment

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

Mitigation

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

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

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

Between 2019/20 and 2020/21 there was a 10% increase in transgender hate crime in Haringey⁵⁰. It is considered unlikely that transgender people will be unduly negatively impacted by the LTN project.

Assessment

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

Mitigation

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

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

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

Assessment

⁵⁰ Haringey State of the Borough

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

Research indicates that motor traffic pollution is linked to poor pregnancy outcomes leading to children who more susceptible to disease later in life⁵¹ and as such action to reduce motor vehicle reliance, including LTNs, will serve to better protect pregnant women and unborn children. However we also recognize that some women may need to travel by motor vehicle more often later in pregnancy including by bus and the LTN may cause some variance in journey times in the short term. However, we also expect that in the medium to longer term a reduction in driven trips and therefore traffic congestion will favour those who need to make essential trips by motor vehicle or bus. In addition, research shows that physical activity such as walking or cycling can be an essential factor in the prevention of depressive disorders of women in the post-natal period⁵² and there is good evidence that LTNs lead to people being more physically active⁵³.

Mitigation

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

Religion / Belief

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

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

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

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

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

Assessment

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

Mitigation

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

Sexual Orientation

- 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents⁵⁶.

Assessment

It is unlikely that the LTN project will unduly impact people with these protected characteristics however the reported reduction in crimes associated with these projects may serve to benefit this protected group⁵⁷. It should also be noted that this is an iterative assessment document and should specific issues come to light around people with protected

⁵⁴ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_bruce_grove.pdf

⁵⁵ https://www.haringey.gov.uk/sites/haringeygovuk/files/ward_profile_west_green.pdf

⁵⁶ https://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf

⁵⁷ LTN's show crime reduction evidence <https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london>

characteristics they can be investigated, mitigation considered and any actions recorded here.

Mitigation

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

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

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

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

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

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

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

Individual circumstance exemptions

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

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

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

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

- enabling a Blue Badge holder who does not live within an LTN or on the immediate boundary of that LTN but who needs to travel through it to register a vehicle for exemption to designated filters within that LTN (including Blue Badge Holders who live within an adjacent borough);
- enabling parents or carers travelling with children with a disability to register motor vehicles required for transport of those children to or through the LTN for exemption to designated filters within that LTN;
- enabling professional carers visiting an address in an LTN to administer care to a care recipient to register a motor vehicle for exemption to designated filters within that LTN.

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

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

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

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

Monitoring and Review

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

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Appendix 1 – Summary of changes to designs after public consultation

Area of LTN	Key post-consultation changes	Reason for change
Bruce Grove West Green LTN (All areas)	Application process to be introduced for Blue Badge Holders living in the LTN area or on boundary roads to apply for an exemption to the LTN filters.	To help people with enduring and substantial mobility problems and/or non-visible (hidden) disabilities to access the LTN.
Bruce Grove West Green LTN Area A	Pembury Road filter to change from physical to emergency access filter	In response to emergency service request
	Sperling Road school street reduced to just Sperling Road (remove section on Moorefield Road, Avenue Road, Woodside Gardens and section of St Loy's Road)	To simplify arrangement and facilitate satisfactory access to industrial estate on Moorfield Road
	Sperling Road emergency filter moved to eastern end by Moorfield Road, and school street closure moved to junction with Woodside Gardens. The emergency filter will be changed to a school street filter if the School Streets are approved but not the LTN filters or the school street is implemented well in advance of the LTN filters should both be approved.	To provide space for turning around away from school entrance.
	Adams Road School Street removed and a school safety scheme to be implemented instead	To better provide the needs of the school and align with the redevelopment of the Broad Water Farm Estate

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

Appendix 2

Stakeholder groups contacted

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

Age UK Haringey & Enfield

DRS Care Homes

Trinity Heart Care homes

Edmanson's Close retirement housing