



**Report for:** Cabinet - 10 December 2024

**Title:** Review of Bruce Grove West Green Low Traffic Neighbourhood trial

**Report authorised by:** Barry Francis, Director of Environment and Resident Experience

**Lead Officer:** Mark Stevens, Assistant Director of Resident Experience

**Ward(s) affected:** Bruce Castle, Tottenham Central, West Green

**Report for Key / Non-Key Decision:** Key Decision

## **1. Describe the issue under consideration**

- 1.1 This report sets out the outcome of the Bruce Grove West Green Low Traffic Neighbourhood (LTN) trial. The report considers the measured impacts of the LTN, feedback received to the non-statutory public consultations and any objections or representations made during the statutory objection period associated with the relevant traffic orders comprising the experimental scheme.
- 1.2 The report also sets out the outcome of the trial ban of heavy goods vehicles (HGVs) that weigh over 7.5tonnes, on B155 Downhills Way and Belmont Road, introduced on 4 September 2023 to help reduce an increase in these vehicles.

## **2. Cabinet Member Introduction**

- 2.1 As we consider the future of our Bruce Grove West Green Low Traffic Neighbourhood, we must reflect on what kind of borough we want to create—not just for today, but for generations to come.
- 2.2 Jane Jacobs, urban theorist and author, taught us that successful neighbourhoods are built on the foundations of street life, where people feel safe, connected, and part of their community. For too long, we've allowed our neighbourhoods to be dominated by motor traffic, diminishing the simple act of walking to the shops or children playing in their streets.
- 2.3 London ranks among the most congested cities in Europe and faces some of the lowest health outcomes in the Organisation for Economic Co-operation and Development (OECD). The correlation is clear: how we design our streets directly impacts how we live our lives, our daily choices, and ultimately, our wellbeing. The 'magic pill' for public health isn't found in a pharmacy—it's found in our ability to incorporate physical activity into our daily routines.
- 2.4 The data from our Bruce Grove West Green LTN trial tells a compelling story. We've seen significant reductions in traffic on residential streets, with 43,316 fewer vehicles per day counted across internal roads (a 51% decrease). Importantly, the impacts on our boundary roads have been far more modest than initially

predicted—with an increase of just over 5,000 vehicles counted (3%) from 162,345 to 167,423, comparing favourably to anticipated increases of 50-100% on some boundary roads.

- 2.5 Importantly, the trial has also highlighted pre-existing challenges in our borough—particularly on boundary roads—that now demand our urgent attention. These aren't new issues, but the LTN has brought them into sharper focus. That's why we're bringing forward a comprehensive package of improvements for our main roads, including better bus priority, enhanced pedestrian crossings, and measures to smooth traffic flow. Our goal isn't to simply shift problems from one place to another, but to create a better environment for everyone.
- 2.6 This LTN is not a standalone solution but part of a broader, integrated approach to urban transformation. It connects with our wider initiatives on walking and cycling infrastructure, school streets, and public realm improvements. Together, these create a network of people-friendly spaces that encourage active travel and support local life.
- 2.7 The challenge before us isn't technical—we know how to create better streets. The real work lies in collaborating with our communities to reshape our public spaces together. Every street improvement, every new crossing, every tree planted is part of our shared vision for a more liveable borough.
- 2.8 We must design our streets not for the traffic we have, but for the community life we want to nurture. Every decision we make today shapes the borough our children, grandchildren, and great-grandchildren will inherit. When they look back, will they see that we recognised the urgent need to prioritise their health, their safety, and their future?
- 2.9 When we create spaces that prioritise people over cars, communities thrive. This is our opportunity to demonstrate that Haringey, through genuine partnership between residents and the council, is committed to creating a borough that works for everyone—not just for the next few years, but for generations to come.

### **3. Recommendations**

It is recommended that Cabinet:

- 3.1 Considers the measured impact of the trial LTN as set out in the Monitoring Reports, Appendix A1 and A2.
- 3.2 Considers the responses received to the non-statutory public consultations and the statutory consultation, including objections to the experimental traffic orders, as set out in the Consultation Reports, Appendix B1 to B4.
- 3.3 Approves the recommended responses to main themes of objection, as set out in Appendix C.

- 3.4 Considers and discharges the Council's statutory duties under section 16 of the Traffic Management Act 2004 and section 122 of the Road Traffic Regulation Act 1984.
- 3.5 Considers and discharges the Council's statutory duties under the Equality Act 2010 including the discharge of the Public Sector Equality Duty and any impact on Human Rights and approve the updated Equality Impact Assessment, Appendix D.
- 3.6 Agrees that the Council shall exercise its discretion to not cause a public inquiry to be called.
- 3.7 Approves making the trial LTN permanent.
- 3.8 Delegates authority to the Head of Highways and Parking for the making of traffic orders which give permanent effect to the experimental traffic scheme known as Bruce Grove West Green Experimental LTN.
- 3.9 Approves making the trial 7.5 tonne weight limit on Downhills Way and Belmont Road permanent.
- 3.10 Delegates authority to the Head of Highways and Parking for the making of the traffic order which will give permanent effect to the experimental traffic scheme known as Experimental HGV Ban – Bruce Grove West Green Experimental Order 2023 T35.

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

- 4.1 The reason for recommendation 3.1 is to provide Cabinet with empirical evidence of the impact of the LTN.
- 4.2 The reason for recommendations 3.2 and 3.3 is to ensure compliance with (a) the Regulations<sup>1</sup> whereby the order making authority must consider all unwithdrawn objections before making an order and (b) consider all consultation responses, in line with the 'Gunning' or 'Sedley' requirements. In short, this means: consultation must be at a time when proposals are still at a formative stage; Sufficient reasons must be put forward for any proposal to permit "intelligent consideration" and response; Adequate time is given for consideration and response; and the product of consultation is conscientiously taken into account by the decision maker.
- 4.3 Recommendation 3.4 is made to ensure that the Council discharges its statutory duties as contained within the Traffic Management Act 2004 and the Road Traffic Regulation Act 1984, as discussed in the report.
- 4.4 Recommendation 3.5 is made to ensure that the Council discharges its statutory duties in relation to equalities and human rights, as discussed in paragraphs 10.5 to 10.16
- 4.5 The reasons for recommendation 3.6 are set out in section 9.

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<sup>1</sup> [www.legislation.gov.uk/ukxi/1996/2489](http://www.legislation.gov.uk/ukxi/1996/2489)

4.6 Having taken into account all responses to all consultations, objections, the monitoring data, the Council's existing strategic plans, statutory duties, studies on LTNs, the urgent need to respond to the Climate Emergency and to improve public health through increased active travel, the reason for recommendations 3.7, 3.8, 3.9 and 3.10 is to enable the Council to make the trial LTN and the 7.5t weight limit permanent.

## **5. Alternative options considered**

- 5.1 At this stage of an experimental traffic order (ETO), the Council must take a decision whether to make the traffic orders permanent. No changes to the LTN scheme are permitted in moving the orders to permanent orders. Notwithstanding the above, the existing LTN design meets the principles of such a scheme by preventing through-traffic (except to exempt vehicles) and whilst alternative options do exist (for example to provide all resident motorists with more routes to their street or property) this could not be achieved without undermining the objectives of the LTN; therefore this option is not recommended.
- 5.2 If the Council does not make the LTN permanent, the alternative is to revoke the traffic orders (or let them lapse) and, as a consequence, the Council must remove the traffic signs that give effect to those orders and, therefore, remove the LTN. This alternative is not recommended for the reasons given in paragraph 4.6.
- 5.3 If the Council does not make the HGV ban permanent, the alternative is to revoke the traffic orders (or let them lapse) and, as a consequence, the Council must remove the traffic signs that give effect to those orders and, therefore, remove the HGV ban. This alternative is not recommended as it would not help address the rise in HGVs along Downhills Way and Belmont Road seen after the above LTN was implemented and therefore helped mitigate against this. Should the LTN not be made permanent, then the recommendation remains to retain the HGV ban as it brings benefit to the residents of these streets.
- 5.4 It is noted that, should the LTN not be approved to be made permanent, then the traffic filter located at the junction of Sperling Road and Moorefield Road would revert from an at-any-time 'no motor vehicle' restriction to a standard School Street filter (SS02 operating Mon-Fri 8:15-9:15am and 3-4pm) in accordance with the decision taken by Cabinet in July 2023<sup>2</sup>.

## **6. Background information**

### Summary of the trial LTN

- 6.1 Paragraphs 6.2 to 6.8 aim to provide a high-level view of the purpose, findings, successes and the rationale for recommending that the LTN is made permanent. Later sections of this report, and associated appendices, provide further detail and

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<sup>2</sup> <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=76037#mgDocuments>

should be read in full to ensure a complete understanding of the issue under consideration.

## 6.2 Purpose of the trial LTN

6.3 Bruce Grove West Green LTN was implemented on trial basis (experimental traffic orders) to enable assessment of its impact against the three key objectives, as set out in the Monitoring Strategy<sup>3</sup>:

- Create healthier streets in the West Green, Bruce Castle and Tottenham Central wards.
- Significantly reduce the volume of through motor traffic on residential streets within the study area.
- Enable an increase in active travel with people choosing to walk or cycle for short journeys, rather than use the private car.

## 6.4 Key findings during the trial:

- **Traffic Reduction:** Motor vehicle traffic counts on internal streets decreased by 51%, equating to 43,316 fewer vehicle counts daily. Boundary road traffic increased slightly by 3%, equating to 5,078 fewer vehicles counted daily.
- **Active Travel:** Cycling increased by 33% on internal roads, and dockless bike use had risen to 21,500 trips starting or ending within the LTN in September 2024.
- **Air Quality:** Analysis by Imperial College London indicates a small improvement in air quality (reduction in nitrogen dioxide (NO<sub>2</sub>) levels) for both Internal and boundary roads relative to borough-wide locations; however both figures are not statistically significant.
- **Road Danger:** Collisions decreased by over 56% (18 fewer casualties) on internal roads and by 18% (20 fewer casualties) on boundary roads, however longer-term analysis is required to understand trends
- **Public Sentiment:** Though the consultation revealed mixed opinions, acceptance of the LTN improved compared to the interim review, with increased satisfaction regarding walking, cycling, and noise levels.

## 6.5 Successes of the trial:

- The trial significantly reduced motor traffic and fostered active travel, aligning with its objectives to create safer, healthier streets and reduce vehicle dominance.

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<sup>3</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/22-09-27\\_bruce\\_grove\\_ltn\\_monitoring\\_-\\_finaldocx.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/22-09-27_bruce_grove_ltn_monitoring_-_finaldocx.pdf)

- The LTN enhanced public health outcomes by promoting physical activity, lowering air pollution, and creating a safer environment for vulnerable road users.

## 6.6 Rationale for making the trial permanent

6.7 The recommendation to make the LTN permanent is supported by:

- **Strategic benefits:** Contributing to Haringey's Transport Strategy and the Mayor of London's Transport Strategy and broader climate and health strategies by reducing car dependency and increasing active travel.
- **Community adaptation:** Improved public perception and growing support for walking and cycling suggest an ongoing cultural shift.
- **Public health and environmental gains:** Continued reductions in motor traffic volumes and emissions will lead to better health outcomes, road safety, and environmental resilience.
- **Health and safety benefits:** The trial has demonstrably reduced road danger, removing some of the barriers to uptake of walking and cycling, contributing to long-term public health improvements.
- **Environmental gains:** By encouraging a modal shift from private cars to active travel, the LTN aligns with the Council's efforts to tackle the climate emergency.
- **Integrated vision:** The LTN is part of a larger vision for the whole borough to create liveable, inclusive spaces that prioritise community well-being over car dominance and includes school streets, greener public spaces, walking and cycling infrastructure enhancements.

6.8 This recommendation is supported by comprehensive monitoring data, statutory obligations, and the broader need to enhance the borough's resilience to environmental and health challenges.

### Strategic context

6.9 The Walking and Cycling Action Plan (WCAP)<sup>4</sup> sits under the overarching Transport Strategy<sup>5</sup> which aligns with Haringey's Adopted Transport Strategy and the Mayor of London's Transport Strategy. The WCAP sets out the Council's vision:

- walking and cycling are natural choices
- active travel will improve the wellbeing of our residents, reducing obesity and improving air quality
- reduce motor vehicles use for short trips with a shift to active travel

<sup>4</sup> <https://new.haringey.gov.uk/streets-roads-travel/haringey-streets-people/our-walking-cycling-action-plan>

<sup>5</sup> <https://new.haringey.gov.uk/streets-roads-travel/travel/haringeys-transport-strategy>

- 6.10 The WCAP identifies (Policy 4) that the Council will deliver a network of LTNs across the borough and specifically identifying Bruce Grove West Green. For further details about transport policy objectives, see section 9.
- 6.11 Whilst LTNs are often seen as a strategic transport planning tool they also align with air quality objectives (see Section 8) and Public Health objectives:
- The Health and Wellbeing Strategy (2024 – 29), aims to improve residents' health, prevent illness and reduce health inequalities in Haringey through four themes.
    - Healthy Place Shaping is one of the four themes with an objective to reduce air pollution, support active travel and tackle the climate emergency
    - This was identified as a key objective through engagement with residents and wider stakeholders in combination with looking at data on the health outcomes for the borough.
  - The Air Quality Joint Strategic Needs Assessment (JSNA)<sup>6</sup> includes the following recommendations to address health issues in the borough:
    - Further action to significantly reduce private car use to and from work and school. Sustainable travel options include enabling residents to walk more, promoting the take up of cycling, using public transport more frequently and the increased use of electric vehicles
    - Review current highway design principles across the borough to reduce emissions from road vehicles and reduce the amount of pedestrians and residents being exposed to air pollutants
    - Review highway design principles to better integrate active modes of travel including cycling and walking in all infrastructure improvement projects in future.
  - The Director of Public Health has noted the positive impact of Low Traffic Neighbourhoods on Public Health, as follows “There is a growing evidence base that Low Traffic Neighbourhoods (LTNs) are an important intervention for enhancing public health and environmental sustainability. By reducing motor vehicle dominance on residential streets, LTNs create cleaner, safer, and more accessible environments. Key benefits include:
    - Reduction in air pollution: LTNs decrease car trips, reducing harmful emissions. This can have a positive impact on the estimated 8.2% of early deaths in Haringey attributable to air pollution, equivalent to around 100 lives cut short per year (Air Quality JSNA, Imperial College 2020).
    - Promotion of physical activity: Safer, more pleasant streets encourage walking and cycling, helping to combat inactivity. Over 20% of adults in Haringey are inactive, and increased physical activity reduces risks of chronic diseases.

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<sup>6</sup> <https://new.haringey.gov.uk/health-wellbeing/our-public-health-plans-reports/joint-strategic-needs-assessment-jsna>

- Enhanced road safety: Reduced traffic volumes lead to fewer road traffic collisions and injuries, making streets safer for users.
- Improved mental health and wellbeing: Quieter, greener streets enhance mental health by reducing stress and promoting social interaction and outdoor activities.
- By reducing motor vehicle dominance on residential streets, LTNs can create cleaner and safer environments.
- The continuation of LTNs will contribute to creating a healthier and more sustainable Haringey.

### History of the LTN trial

- 6.12 Appendix E provides a visual timeline of the key stages of consultation, monitoring and decision making for the LTN trial.
- 6.13 In December 2021, Cabinet approved<sup>7</sup> three LTN trials and a range of complementary measures including new pedestrian crossings, cycle hangars and six trial School Streets. The decision took account of three stages of engagement, carried out over the Spring and Summer 2021, as well as the strategic context that transport plays in terms of the climate emergency, air quality, roads safety and public health.
- 6.14 In July 2022, the Cabinet Member for Climate Action, Environment, and Transport approved<sup>8</sup> a range of motor vehicle exemptions that would apply to the forthcoming LTN trials.
- 6.15 On 1 November 2022, Bruce Grove West Green LTN was launched on a trial basis, under experimental traffic orders (ETOs). ETOs provide, at minimum, a statutory objection period of 6 months. The LTN included
- 21 traffic filters, enforced via bollards or automatic number plate recognition (ANPR) closed circuit television cameras (CCTV)
  - A range of exemptions for emergency service vehicles, Council refuse vehicles and Blue Badge holders living within the LTN, subject to them meeting the Council's exemption criteria
- 6.16 In July 2023, Cabinet approved<sup>9</sup> an interim review of the LTN exemptions procedure and also approved<sup>10</sup> an interim review of three LTN trials (including Bruce Grove West Green LTN). The latter review considered the ETO objections, feedback and monitoring data. The decisions included changes to the design of the LTN and an expanded range of motor vehicle exemptions available, including the option for any Blue Badge holder in Haringey to apply. The LTN changes consisted of removal of motor vehicle restrictions at Linley Road and at Moorefield Road and,

<sup>7</sup> <https://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MID=9827>

<sup>8</sup> <https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=78983&PlanId=0&Opt=3#AI73602>

<sup>9</sup> <https://www.minutes.haringey.gov.uk/ieIssueDetails.aspx?IId=83749&PlanId=0&Opt=3#AI76029>

<sup>10</sup> <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=76225>

for The Avenue, motor vehicle restrictions were removed in the westbound direction. This resulted in 19 traffic filters remaining.

- 6.17 As the July 2023 decisions were leading to a genuine and novel experiment, new ETOs were made for the LTN and subsequently brought into effect on 4 September 2023 which provided a new statutory objection period of six months. The ETO for the 7.5T HGV ban along Downhills Way and Belmont Road was brought into effect on the same date, again, with a statutory objection period of six months.
- 6.18 Since September 2023, the Council has continued to monitor the effects of the LTN trial and the trial 7.5T HGV ban as well as gathering feedback from stakeholders through a range of consultations. The results of the monitoring and consultation are considered within this report.

### Other LTN studies

- 6.19 LTNs (or schemes by a different name but with the same effect) are in use globally and there is growing library of studies on LTNs (see further reading in Appendix G) which make the case for their implementation. Highlights of those studies include the following:
- LTNs do not adversely affect emergency response times
  - LTNs decreased car ownership and use, increased active travel
  - LTN halved absolute numbers of injuries relative to rest of London
  - Positive impact on NO<sub>2</sub> and traffic by LTNs
  - Traffic volumes on boundary roads did not increase in most neighbourhoods.

### Monitoring data

#### *Monitoring approach*

- 6.20 The approach towards LTN monitoring was defined within the Bruce Grove West Green LTN Monitoring Strategy<sup>11</sup>. Specific details of the monitoring methodologies and outcomes are provided within the Monitoring Reports (Appendix A1 and A2) with the key points of each metric discussed below. A high-level summary of the data is provided in Appendix F.
- 6.21 Unless stated otherwise, traffic volumes compare normalised flows between November 2021 (pre-LTN) and November 2023 (post-LTN-Now) surveys.
- 6.22 It is noted that, for air quality, traffic volumes and cycle counts, two methods of analysis have been carried out. Full details are provided in Appendix A1 and A2, the results are discussed in the respective section of the report below and the methods are summarised as follows:

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<sup>11</sup> [https://www.haringey.gov.uk/sites/haringeygovuk/files/22-09-27\\_bruce\\_grove\\_ltn\\_monitoring\\_-\\_finaldocx.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/22-09-27_bruce_grove_ltn_monitoring_-_finaldocx.pdf)

- 6.23 Method A: before/after comparison (carried out by SYSTRA Limited)
- 6.24 Method B: Difference-in-Difference (DID) statistical model (carried out by Imperial College London)
- 6.25 Method A is a simple before and after comparison and works by using data from each site which is then annualised (where required) and bias adjusted. Comparison is made of the same site 12 months before and after the LTN was introduced and then compared against boroughwide sites which exclude the three trial LTNs, i.e. a control site.
- 6.26 Method A provides a simple comparison before and after and doesn't consider changes in weather month by month but looks rather at the change in traffic volumes / air pollution before and after LTN was introduced. It cannot categorically assign the change to the LTN fully as many other factors affect traffic / air quality but provides a useful comparison of how traffic / air quality in the same area has changed over time and what the current volumes / levels are.
- 6.27 Method B uses a Difference-in-Difference (DID) model which is a statistical technique (mostly in the form of a regression model) used in this instance to evaluate the effect of the LTN by comparing changes in traffic volume / air pollution (NO<sub>2</sub> levels) before and after the LTN was introduced on roads within the LTN, the boundary roads and the wider boroughwide roads excluding the LTN. This matches any change observed in traffic volume / air pollution to the LTN policy intervention, accounting for any other trends that may be occurring in the area. This method accounts for site-specific and time-specific effects by estimating a unique coefficient for each site and month (or day, for traffic volume).
- 6.28 Like Method A, the approach taken in Method B has been applied in similar studies, such as congestion charging and low-emission zones, and other international studies.
- 6.29 Method B is a more sophisticated assessment process than Method A in that it distinguishes between changes caused by the LTN and changes that could have occurred regardless of it. As other factors influence air quality, the DID method separates the impact of the LTN from other influences by using a control group and a regression model, which isolates the true, unbiased effect of the LTN. DID is considered to provide a more robust method for evaluating the real impact of policies and schemes.
- 6.30 Whilst the sole use of Method A provides useful comparison of air quality over time, it cannot categorically assign the change to the LTN fully. Method B was undertaken as it provides a more definitive way of attributing any change to the LTN. In view of this, both Methods are appropriate and useful in their own merit and therefore are both included within this report.

### *Motorised vehicle volumes*

- 6.31 Total motorised vehicle volumes have declined for most internal roads within the Bruce Grove West Green LTN area, with limited percentage increases on scheme boundary roads. Overall, 43,316 fewer vehicles per day were counted across internal roads, equating to an overall decrease of 51% in such volumes, whilst the number of vehicles counted on boundary roads per day increased by just over 5,000 vehicles (from 162,345 to 167,423), a 3% increase from the November 2021 pre-LTN counts.
- 6.32 It is important to note that vehicles travelling through the LTN may go through multiple counter sites, so the total number of vehicle journeys counted is certain to be higher than the actual number of trips taken.
- 6.33 It is noted that whilst there has been an overall decrease in motor vehicle volumes there are a small number of internal roads where there has been an increase, in some instances this is because they are the only access routes in and out of the LTN cells, for example, Mount Pleasant Road (near Lordship Lane), Adams Road, Drayton Road and Sandringham Road have all seen increases. Significant decreases have been observed in Langham Road and Downhills Park Road.
- 6.34 For boundary roads the most significant increases have been observed on West Green Road and Green Lanes (by Carlingford Road). Increases have also been seen in Belmont Road. Decreases have been noted in Downhills Way and Lordship Lane (near Elsdon Road).
- 6.35 A High-Level Transport Assessment of anticipated increase in traffic volumes was undertaken and formed part of the information considered by Cabinet in December 2021 when considering whether to implement the LTN trials or not. For Bruce Grove West Green LTN, anticipated increases on the majority of boundary roads was between 0 and 50% for both the morning and evening peaks. However, increases of 50 to 100% were anticipated at the Bruce Grove/Tottenham High Road junction for the evening peak and West Green Road westbound (at the Belmont Road junction) for the morning peak and increases of more than 100% for Belmont Road for the morning and evening peak and West Green Road westbound in the evening peak. The post-LTN counts undertaken in November 2023, a year after the original trial scheme went in indicates that the anticipated higher levels of increased traffic have not materialised, suggesting that fewer people than anticipated are driving through the area now which is encouraging. Those that have continued to drive are likely to have travelled along boundary roads as they can no longer pass through internal LTN roads, unless they hold an exemption.

### *Goods vehicle volumes*

- 6.36 This metric covers light goods vehicles (LGVs) such as vans commonly used for deliveries and heavy goods vehicles (HGVs) which are larger than a two-axle van.
- 6.37 Overall, volumes of goods vehicles decreased considerably on internal roads and increased slightly on boundary roads, as follows:
- Internal roads

- LGVs decreased by 2,474 vehicles per day (-41%)
- HGVs decreased by 1,014 vehicles per day (-53%)
- Boundary roads
  - LGVs increased by 72 vehicles per day (+1%)
  - HGVs increased by 1,000 vehicles per day (+1%)

6.38 It is noted that the increases on boundary roads reflect national trends, whereby the number of deliveries resulting from the surge in online shopping has increased.

6.39 Where there has been an increase in the proportional number of LGVs (such as along Downhills Park Road at Downhills Park and Radley Road) there has been an overall decrease in the total number of vehicles in this road.

6.40 A heavy goods vehicle (HGV) ban was introduced in September 2023 on B155 Downhills Way and Belmont Road to address concerns raised about the increase in these vehicles following the launch of the trial LTN. Evidence suggests this has been successful: Belmont Road saw a substantial decrease; from 440 HGVs counted in November 2021, increasing to 604 post LTN being introduced and then reducing to 91, based on the latest counts undertaken in November 2023 (a 79% reduction).

#### *Motorcycle volumes*

6.41 Overall, it appears that motorcycle volumes tend to follow the general trend of LTN-related motorised vehicles with a decrease for internal roads and increase for boundary roads.

6.42 Motorcycle volumes decreased across most internal roads, with a 35% decrease in motorcycles (-1,780 per day); however, the proportion of motorcycle usage compared to other motorised traffic increased by 2 percentage points

6.43 Boundary roads observed an increase of 1,225 motorcycles (17%). However, this does not affect the proportion of motorcycles compared to other motorised traffic on boundary roads, which remains at 5%.

#### *Impact of Haringey LTNs on traffic count, Imperial College London*

6.44 Method B: Difference-in-Difference (DID) statistical model for motor vehicles has been split into two types, light vehicles which includes motorcycles, cars, vans and LGVs. A separate assessment has been undertaken for heavy vehicles which comprises heavy goods vehicles. The results for each type are shown below as a percentage change due to the LTN:

- Light vehicles: Internal roads -37.7%; Boundary roads +2.9%
- Heavy vehicles: Internal roads -41.9%; Boundary roads +59.5%

#### *Cycle volumes*

- 6.45 Long-term monitoring of cycling has been captured, since 2022, at a borough-wide level via the Council's network of smart cameras that count all road users on main roads sites across the borough. The annual data for cyclists per day at all sites, shows an increasing level of cycling:
- 2022 = 7,469 cyclists counted per day
  - 2023 = 8,997 cyclists counted per day
  - 2024 = 9,231 cyclists counted per day
- 6.46 As part of the LTN monitoring, automatic traffic counters were used (see 6.21) to count cycling levels within the LTN. The data shows an increase in cycling on both internal roads and boundary roads, with cycling levels increasing by 33% on internal roads and by 17% on boundary roads.
- 6.47 Internal roads saw an increase of 1,222 daily cycles counted, and boundary roads saw an increase of 492 such cyclists, with the majority of roads contributing to the overall increase.
- 6.48 It should be noted that there was considerably more rainfall in November 2023 than November 2021, so the increases in cycling flows should be considered in spite of materially worse weather.
- 6.49 Dockless bicycles ('Lime bikes' and 'Forest bikes') began operating in the LTN area roughly at the same time as the LTN trial commenced. During that period, the number of Lime bike trips alone starting or ending within the LTN has grown exponentially from 4,500 per month (November 2022) to 21,500 per month (September 2024), a 378% increase.
- 6.50 Whilst it is not possible to attribute the growth of cycling directly to the LTN itself, the regular use of dockless bicycles does indicate a significant propensity to cycle within the LTN.

#### *Impact of Haringey LTNs on cycling, Imperial College London*

- 6.51 Method B: Difference-in-Difference (DID) statistical model for cycles was run, the results are shown below as a percentage change of cycles due to the LTN:
- Cycles: Internal roads +17.7%; Boundary roads -0.9%

#### *Vehicle speeds*

- 6.52 Speeding is a major contributing factor to road danger, so reducing speeding is vital to making roads safer for all as well as creating streets that are designed for people.
- 6.53 In general, motor vehicle speeds across internal and boundary roads have decreased across key metrics.
- 6.54 On internal roads, there is a wide range of changes for vehicle speeds. Average vehicle speeds across these roads decreased by 1mph or -5% in comparison to

pre-LTN values and all are still within the 20mph speed limit, when evaluating average speeds.

- 6.55 On boundary roads, average speeds decreased by 1.8mph or -9% with most roads remaining under the 24mph threshold. Downhills Way has seen a small decrease in speed and at 24.1mph is just over the 24mph threshold. This will be reviewed as part of the 20mph speed limit programme.
- 6.56 It is noted that congestion on boundary roads may play a role in reduced average speeds although it is also important to note that traffic counts still pick up vehicles moving at low speeds.

#### *Bus journey times*

- 6.57 Surrounding the LTN are four bus corridors. Analysis of Transport for London (TfL) bus journey times for each is summarised as follows:
- 6.58 **High Road N17:** This corridor has seen an increase in journey times predominantly in the southbound direction, the latter indicating an average delay of 0.5min/km. This direction indicates greater fluctuations compared to before the LTN was introduced.
- 6.59 **Lordship Lane and Bruce Grove:** This indicates no change in the westbound direction, but in the eastbound direction, there is a delay in journey time of 2min/km. This direction indicates greater fluctuations compared to before the LTN was introduced.
- 6.60 **Lordship Lane East:** This part of the corridor (east of junction A10) seems to indicate no change between before and after LTN launch, however there is more variability than pre-LTN bus journey times, with several peaks compared to the westbound direction which has seen less variability than pre-LTN bus journey times.
- 6.61 **West Green Road and Philip Lane:** This corridor indicates a delay in journey time of 1min/km in the westbound direction and 1.2m/km in the eastbound direction. Both directions have seen significantly more variability than pre-LTN bus journey times.

#### *Collisions and casualties*

- 6.62 Collisions refers to road traffic collisions reported to the police where one or more vehicle is involved, and an injury is sustained. The data being considered here is the difference in the number of collisions and severity of casualties before and after the LTN scheme was implemented (one year before and one year after).
- 6.63 There is likely a strong correlation between motorised vehicle flows and the number of collisions, as lower traffic levels reduce the risk of exposure to collisions.
- 6.64 However, other factors such as vehicle speeds, changes in proportions of vehicle types (e.g. more cycles, motorcycles and goods vehicles) can also have a significant effect on collision and casualty numbers.

- 6.65 Drawing conclusions about the scheme based on collision data is difficult, as the sample size is thankfully too small (particularly for specific parts of the network) to know whether changes are related to the LTN and/or other factors. This is particularly true of drawing conclusions about specific junctions or stretches of road. As such, it would not be appropriate to report at this level of detail.
- 6.66 Best practice is to consider data over a longer period (see paragraph 6.129) as this can highlight consistent patterns and provides a clearer picture of trends. 3-year data often shows more reliable trends in the severity of casualties (fatalities, serious injuries, etc.) whilst longer-term data can better reflect the impact of road safety measures and policies. Trends among different road user groups (e.g., pedestrians, cyclists, motorcyclists) are more discernible over a longer period.
- 6.67 That said, on a general basis, there appears to have been a moderate reduction in the total number of collisions (crashes) and casualties (numbers injured) between the 12 months before and the 12 months after the scheme was implemented. Not surprisingly, the number of collisions on internal roads has gone down by over 50% (and casualties down 60%), in line with the reduced traffic volumes on these roads. However, despite the slight increase in traffic on boundary roads, the volume of total collisions on such roads has dropped by 18%, with casualties dropping by 12%.
- 6.68 It is possible that changes in traffic volumes have played a role in these changes, but other metrics such as vehicle speeds, increased driver awareness and caution (in light of the scheme being new) and many others could have also been factors.
- 6.69 It is interesting to note that the reduction observed here aligns with an academic study published in 2021<sup>12</sup> that identified that, inside LTNs, total injury numbers approximately halved after LTN implementation.

#### *Air quality*

- 6.70 Air quality refers to the air around us, how clean it is and how many pollutants (harmful chemicals or substances) it contains. The more pollutants the air contains, the more air pollution there is and the worse the air quality is. Poor air quality is a concern as air pollution can impact health. One of the main pollutants of concern and identified by Governments that the Council monitors is nitrogen dioxide (NO<sub>2</sub>). NO<sub>2</sub> is toxic gas that can be very harmful to the human respiratory system. To monitor the levels of NO<sub>2</sub>, diffusion tubes are placed at individual roads and measure the air's concentration of nitrogen dioxide (NO<sub>2</sub>). The tubes are replaced and analysed on a monthly basis.
- 6.71 Air quality varies naturally over time due to a variety of factors, including seasonal variations, weather and other non-transport factors. It is therefore important to look at trends over a longer period of time, ideally for at least a year, to identify real changes in air quality that could be attributed to the scheme. The ultimate goal of

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<sup>12</sup> <https://findingspress.org/article/25633-impacts-of-2020-low-traffic-neighbourhoods-in-london-on-road-traffic-injuries>

the air quality strategy is to reduce air pollution as much as possible, and certainly to within legal limits.

- 6.72 As noted in paragraphs 6.22 to 6.30, two methods of evaluation have been used.
- 6.73 Method A revealed that overall, the concentration of NO<sub>2</sub> increased by 2% for the sites in the LTN scheme area compared to a 5% increase for sites elsewhere in the borough (excluding all three LTN sites). Data for roads on the LTN boundary show an increase of 8% compared to a boroughwide increase of 5% but roads within the LTN showed a 4% decrease compared to a 4% increase elsewhere in the borough.
- 6.74 Method B revealed that: there has been an improvement in air quality on internal roads (a 4.5% reduction in NO<sub>2</sub>) and on boundary roads (a 2.3% reduction in NO<sub>2</sub>) relative to external sites. However, these differences are not considered statistically significant.

#### *Crime*

- 6.75 The volume of criminal activity reports in the scheme area and in the borough-at-large are broadly similar, both before and after the scheme's introduction. There is no indication that crime patterns within the Bruce Grove West Green LTN area have been impacted by the introduction of the LTN scheme

#### *Footfall*

- 6.76 The Council collects footfall data through counters based at strategic locations on high streets across the borough.
- 6.77 In West Green Road / Seven Sisters, generally, footfall has increased for around half of the weeks since the first week of implementation of the LTN.
- 6.78 In Bruce Grove, footfall has on average increased following the implementation of the LTN.
- 6.79 In both locations, it is noted that significant fluctuations in footfall coincide with events at Tottenham Hotspur Stadium. A general decrease observed around Christmas week is consistent with other high streets. As such, it is noted that fluctuations may be induced by seasons and nearby events.
- 6.80 Therefore, the footfall analysis has indicated that footfall has generally increased since the implementation of the LTN. However, this may not have been caused directly by the LTN.

#### *Instore card spend*

- 6.81 Mastercard's Retail Location Index (MRLI) uses anonymised transaction data from billions of cards to measure sales, transactions, and accounts. Mastercard uses the geocoded location of merchants aggregated to an area and transaction data to create a timeseries. The data only includes physical sales (i.e. not online).

6.82 Despite a drop in card spend observed in early 2024, post-LTN card spend has generally been similar to or has exceeded pre-LTN levels. However, no causal relationship between the introduction of the LTNs and the instore card spend can be made and there are wider impacts on spend to consider, including cost of living, inflation and the energy crisis

### *Exemptions*

6.83 Exemptions have been available since the launch of the LTN and, following the interim review, were extended so that all Blue Badge holders living in Haringey could apply to drive through most of the traffic filters that are enforced by camera. Previously, exemptions were available only for Blue Badge holders who lived within or on the immediate boundary of the LTN.

6.84 The majority of exemption permits have been issued to motorists who applied under the 'Haringey Blue Badge holder' (89%) or 'Individual Circumstances' (8%) criteria. In those cases, exemptions are generally valid across all three trial LTNs (where the traffic filter displays the relevant permit code (X1, X2, X3)).

6.85 Unsurprisingly, most applications are made by people who live within the LTN. However, of those who live outside an LTN, there is a significantly larger proportion of applicants living in the east of the borough than in the west; this aligns with health and deprivation data<sup>13</sup> that shows that communities in the east of the borough have higher levels of long-term health conditions and, therefore, are more likely to be eligible for an exemption under the Blue Badge or Individual Circumstance criteria.

### *Compliance*

6.86 Compliance refers to the adherence of motorists to traffic restrictions that are conveyed by traffic signs. Compliance with these signs ensures that everyone follows the same rules, helping to reduce road danger and ensure that the LTN delivers its objectives.

6.87 When motorists do not comply with the LTN traffic signs (typically Diagram 619 of the Traffic Signs Regulations and General Directions 2016<sup>14</sup>), the Council may enforce against that behaviour by issuing a penalty charge notice (PCN). Enforcement is used as a mechanism to encourage compliance with the restriction.

6.88 PCN data provides a good indication of the level of compliance and analysis shows:

- Low level of compliance (a peak in PCNs issued) during months 1 and 2
- Steadily increasing levels of compliance from month 3 onward, with an average number of PCNs per day per camera of 12.

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<sup>13</sup> [www.haringey.gov.uk/sites/haringeygovuk/files/haringey\\_public\\_health\\_report\\_2023.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_public_health_report_2023.pdf)

<sup>14</sup> <https://www.legislation.gov.uk/uksi/2016/362/contents/made>

- 6.89 The above numbers show that compliance increases over time and, when compared against the volume of traffic previously using these roads are relatively low, reflecting the fact that the majority of motorists comply with traffic signs.

### Consultation

#### *Consultation approach and the Haringey Deal*

- 6.90 Legally, there is a 6-month statutory objection period from the date that the LTN came into effect, during which time any person could object to the subsequent making of a permanent order.
- 6.91 However, the Haringey Deal makes clear that the Council expects more than just the legal minimum. The Council is committed to creating meaningful opportunities for its residents, partners and stakeholders to participate and share their thoughts on the issues that matter to them.
- 6.92 This LTN project has seen unprecedented levels of consultation with three stages of engagement prior to launch, followed by an experimental (trial) scheme that provided everyone the opportunity to see the scheme in operation and comment on their lived experience.
- 6.93 Between 23 August and 20 September 2024, the following consultations were carried out (consultation and communication materials and stakeholder lists are provided in Appendix H):
- Public consultation – leaflet distributed to approximately 18,000 properties with online questionnaire via the CommonPlace platform.
  - Disabled people survey – delivered by email or post to 10,000 Haringey Blue Badge holders and referenced in the other consultation documents.
  - Carers survey – communicated through carer networks and referenced in the other consultation documents.
  - Business perception survey – door-to-door visits of businesses located within and immediate boundary of the LTN from 23 July to 7 August 2024.
  - Email to over 150 key stakeholders
- 6.94 Responses to the above could be submitted online, or paper copies were available which could be returned via Freepost. Alternative formats and translation services were available and a dedicated phone number and email address were provided for any further assistance.
- 6.95 Communication of the consultation included:
- Paper copies in local libraries
  - 280 lamp column wraps
  - HPX newsletter
  - School newsletter
  - Business bulletin

- SEND newsletter
  - Digital screens in libraries and council buildings
  - Emails to stakeholder and reference groups (local groups, trader groups, faith groups, disability groups, Joint Partnership Board, carer networks, health trust/partners, MPs, statutory bodies and internal teams)
  - Enfield Council notified
  - Staff bulletin
  - Ongoing social media campaign
- 6.96 Full detail of the responses to the consultations, completed since the 2023 interim review, can be found in Appendices B1 to B5.
- 6.97 It came to light, after the consultation closed that, due to human error, the software provider (CommonPlace) closed the LTN consultation platforms early at 11:17pm instead of 11:59pm on Friday 20 September 2024, but it is important to note that the consultation had been open since 23 August. Unfortunately, the Council was not made aware of this and it only came to light when one person who was impacted by this (in respect of St. Ann's LTN) contacted the Council. The Council subsequently contacted this person and enabled them to respond by supplying a copy of the questionnaire.

*Statutory objection period*

- 6.98 The statutory objection period associated with the experimental traffic orders (both for the trial LTN and the trial 7.5 tonnes on B155 Downhills Way and Belmont Road) ran from 4 September 2023 to 3 March 2024. During that time, a total of 277 responses (objections or representations) were received, of which 228 respondents made formal objections, 43 provided comments in support and 7 respondents provided feedback with a negative sentiment without outright objection to the scheme.
- 6.99 The main objection themes along with officers' recommended responses are set out in Appendix C those main themes are:
- LTN generates additional pollution and noise through extra vehicle trips, and has displaced vehicles from the internal roads onto boundary roads
  - LTNs have a negative Impact on road safety / safety
  - LTNs are unfair as they negatively impact businesses and the economy (social and health, both physical and mental, impacts perceived by residents, concerns about antisocial behaviour and community cohesion, feelings that the scheme may promote inequality)
  - LTNs should be removed
  - Modify the LTNs (improved street design features, junction management, enforcement, further consideration regarding exemptions)
  - LTNs have been implemented without considering the public's preferences

- 6.100 The level of response should be considered in the context of the LTN being relatively large and the high level of interest in the schemes from respondents locally, across Haringey and beyond. It is noted that the number of objections in this report are considerably lower than those reported in the interim review (783 formal objections).
- 6.101 As outlined in Appendix C, officers concluded that objections are not supported by available evidence, can be mitigated by proposed measures, or that any acknowledged drawbacks are outweighed by the scheme's benefits, which align with the Council's policies. In addition, where objections are accepted, either fully or partially, officers believe that the planned mitigation identified in paragraph 6.138 and other projects discussed in paragraph 6.139 can effectively address the concerns raised.
- 6.102 Given the above, officers recommend that the Council exercise its discretion to not cause a public inquiry to be called on account of the effect of the order, that the LTN contributes towards achieving a number of policy objectives and that holding a public inquiry would lead to expense and delay.

### Non-statutory consultation and petitions

6.103 During August and September 2024, non-statutory (informal) consultation was carried out via four different consultations. The main headlines from those consultations are provided below.

#### 6.104 Public non-statutory consultation

| Public non-statutory consultation<br>(CommonPlace)                 |   |   |                                 |
|--|---|---|---------------------------------|
| Number of responses  |   | 2,564   |                                 |
| About you and your connection to the LTN                           |   |   |                                 |
| Live in or the boundary of the LTN?                                | 78%   |   |                                 |
| Do you have a disability?  | 15%   | Of which 29% said it affected their mobility  |                                 |
| Household has access to one or more motor vehicle?                 | 72%   | Census figures show only 42% <sup>15</sup> have access to one or more motor vehicle |                                 |
| Do you use the motor vehicle for work?                             | 50% do not  | Others used their vehicle for work sometimes (21.8%) or most of the time (21.1%).   |                                 |
| Views on the LTN   |   |   |                                 |
| For streets <u>within</u> the LTN, how do you feel about....       | Walking   | 44% feel positive   | up from 35% at interim          |
|  | Road safety   | 42% feel positive   | up from 31% at interim          |
|  | Noise   | 41% feel positive   | not asked at interim            |
|  | Cycling   | 41% feel positive   | up from 33% at interim          |
|  | Pollution   | 40% feel positive   | up from 29% at interim          |
|  | Traffic congestion  | 48% feel negative   | down from 65% at interim        |
|  | Personal safety   | 44% feel negative   | down from 53% at interim        |
|  | Crime and ASB   | 46% feel negative   | down from 49% at interim        |
| Since the LTN was introduced, has the way you travel changed?      | 33% are walking or wheeling more, 56% no change<br>28% are cycling more, 55% no change<br>26% are driving more, 50% no change |   |                                 |
| In general, how do you feel about the LTN?                         | Within the LTN*   | 45% feel positive<br>53% feel negative  | Not available from interim      |
|  | Boundary road*  | 13% feel positive<br>85% feel negative  | Not available from interim      |
|  | All responses   | 37% feel positive<br>60% feel negative  | up from 28% positive at interim |
| How has the LTN affected your experience of community in the area? | 30% have not noticed any change<br>28% feel less connected  |   |                                 |

<sup>15</sup> Average figure of the four Middle layer Super Output Areas (MSOA) that overlap the LTN

\* Based upon postcode and street name, where provided, see Appendix B1 for further details

|  |  |  |                          |
|--|--|--|--------------------------|
| How do you feel about HGV ban on Downhills Way / Belmont Road (B155) |  | 45% feel positive<br>18% feel negative |                          |
| Views on LTN exemptions  |  |  |                          |
| How do you feel about the motor vehicle exemptions                   | More should be exempt  | 58%                                    | Down from 67% at interim |
|  | The right level of exemptions or fewer exemptions should be issued | 42%                                    | Up from 33% at interim   |
| Comments (top 5 count for each question)                             |  |  |                          |
| Are there any changes or alternatives you would like to see?         | Remove the LTN   |  | 327                      |
|  | Cycle improvements required  |  | 300                      |
|  | Improve access/allow exemptions – residents                        |  | 153                      |
|  | Increased lighting   |  | 139                      |
|  | Pedestrian/walking improvements - Crossings                        |  | 114                      |
| Any other comments about the trial LTN?                              | Congestion/traffic build-up/displacement                           |  | 320                      |
|  | Remove the LTN   |  | 307                      |
|  | Support the LTN  |  | 222                      |
|  | Increased pollution (unspecified)                                  |  | 188                      |
|  | Proposals are unfair/create inequality                             |  | 155                      |
| Changes to exemptions?   | Improve access/allow exemptions – residents                        |  | 501                      |
|  | Remove the LTN   |  | 194                      |
|  | Improve access/allow exemptions - disabled people/carers           |  | 90                       |
|  | Improve access/allow exemptions – tradespeople                     |  | 46                       |
|  | Congestion/traffic build-up/displacement                           |  | 45                       |

### 6.105 Disabled people survey

|  |   |  |
|--|---|--|
| <b>Disabled people survey</b><br>This survey was open to the public and questions covered all three trial LTNs but with specific questions about each LTN individually     |   |  |
| Number of responses  | 365   |  |
| About you  |   |  |
| About the respondents  | 81% of respondents had a disability<br>23% had a child or family member with a disability               |  |
| Connection to the LTN (self-reported)  | 29% live within Bruce Grove West Green LTN<br>13% live on a boundary road of Bruce Grove West Green LTN |  |
| Most commonly used method of travel  | Motor vehicle followed by bus, then walking or wheeling   |  |
| Experience of the three LTNs   |   |  |
| How aware of the LTN trials are you?   | 79% were aware or very aware  |  |
| In general, how do you feel about the LTN?   | Bounds Green<br>Bruce Grove West Green<br>St. Ann's   | 59% negative, 19% positive<br>59% negative, 18% positive<br>60% negative, 18% positive |
| Exemptions   |   |  |
| The majority of respondents (90%) reported that they know how to apply for an exemption and 68% actually had an exemption. 15% did not know how to apply for an exemption. |   |  |
|  |   |  |
| How easy or difficult was it to complete this questionnaire?   | 82% found it very easy, easy or neither easy nor difficult.   |  |

## 6.106 Carers survey

| Carers survey   |   |   |
|---|---|---|
| This survey was open to the public and questions covered all three trial LTNs but with specific questions about each LTN individually |   |   |
| Number of responses   | 60  |   |
| About you   |   |   |
| Adult carer<br>Young carer (under 18)   | 98% (of which 5 were professional carers)<br>2%   |   |
| Where do you live?<br>(self-reported)   | 22% live outside of an LTN and in another part of Haringey<br>20% live in a different London borough<br>15% within Bounds Green LTN<br>15% Bruce Grove West Green boundary road<br>10% Within St Ann's LTN<br>7% Within Bruce Grove West Green<br>5% Bounds Green boundary road<br>5% St. Ann's boundary road |   |
| Proportion who drive  | 86%   |   |
| Where does the person you care for live?  | Within St. Ann's LTN<br>Within Haringey but not in a trial LTN<br>Within Bounds Green LTN<br>Within Bruce Grove West Green LTN<br>Outside of Haringey   | 30%<br>26%<br>25%<br>21%<br>12%   |
| Travel patterns   | 52% travel to the person they care for by car<br>43% live with the person they care for<br>10% travel by bus<br><br>40% travel with the person they care for on a daily basis   |   |
| Experience of the three LTNs  |   |   |
| How aware of the LTN trials are you?  | 81% were very aware or aware  |   |
| In general, how do you feel about the LTN?  | Bounds Green<br>Bruce Grove West Green<br>St. Ann's   | 82% negative, 7% positive<br>82% negative, 5% positive<br>79% negative, 7% positive |
| How have the trial LTNs affected your overall experience as a carer?  | Most respondents stated that the trial LTNs made it more difficult to travel (84.2%), followed by increased travel time (70.2%)   |   |
| In your opinion, how have the trial LTNs affected the person you care for?  | Most responses were negative (80.7%), with 14.0% stating they were positively affected.   |   |
| Exemptions  |   |   |
| The majority of respondents (73%) reported that they know how to apply for an exemption, but only one third actually had an exemption |   |   |

## 6.107 Business perception survey

| Number of responses                          |   | 22                       |
|--|---|--------------------------|
| Type of business                             | Retail<br>Services<br>Hospitality<br>Creative sector  | 46%<br>27%<br>14%<br>14% |
| Staff travel to and from work                | Just under three quarters (72.7%) of the respondents reported that the LTN had changed how their staff travel to or from work. Of the 16 respondents who reported that the LTN has changed how their staff travel to or from work, ten reported an increase in staff travelling by car, motorbike or taxi, while seven reported an increase in travelling by bus and six in travelling by train/tube. In turn, five respondents reported a decrease in staff travelling by car, motorbike or taxi and four reported a decrease in staff travelling by bus |                          |
| Client / customer travel                     | Around two thirds (68.2%) of respondents suggested that the majority of their clients/customers travel to and from their business by car, motorbike or taxi   |                          |
| LTN impact on client / customer journey time | Almost all of the respondents disagreed that journeys times for clients/customers have decreased (90.9%) since the introduction of the LTN  |                          |
| LTN impact on suppliers                      | Almost all respondents disagreed that journeys times for suppliers have decreased (90.9%), that suppliers can take direct routes to or from their business (95.4%), and that suppliers feel they can use active modes of travel (95.4%).  |                          |
| LTN impact on business                       | Almost all (86.4%) of all respondents reported that business has decreased as a result of the LTN.  |                          |

### *Petitions*

- 6.108 One petition was received (see section 4.4 of the Consultation Report) entitled “[LTNs - Exemption for all Bruce Grove residents](#)”, which gathered 102 signatures.
- 6.109 The petition stated “We the undersigned petition the council to allow all residents to apply for an exemption & grant them to all x3 Bruce Grove LTNs (so that residents have access to x3A and x3B) to help ease the flow of traffic and reduce carbon emissions by significantly reducing the time spent sitting in traffic and journey times. Currently, blue badge holders can only apply for exemptions.”
- 6.110 In July 2023, the Council approved<sup>16</sup> a revised set of exemption criteria which included the option for all Haringey Blue Badge holders to apply for an exemption. An option to allow all residents who live within the LTN to apply for an exemption was not recommended at that time and the Council does not have any plans to reconsider this option. The reason for this is because, as noted in the LTN exemptions report, the aim of the LTN is to provide “the safest possible environment for people to walk, wheel and cycle in” but makes clear that “there is a need to balance the equalities benefits of providing particular exemptions versus the benefits of minimising exemptions”. In view of this, exemptions are available in certain circumstances – such as for Blue Badge holders – but a general exemption

<sup>16</sup> <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?Ild=78983&PlanId=0&Opt=3#A173602>

for residents within the LTN is not recommended as this risks undermining the aim of the scheme.

### *Emergency services*

- 6.111 The Council has had ongoing dialogue with emergency services from the feasibility stage and has continued to adapt its designs to accommodate their needs, for example the provision of ANPR filters over physical closures ensuring their access is maintained.
- 6.112 Provision of access for non-liveried vehicles has been accommodated, when notified, again to meet emergency services needs, reflecting the essential and urgent services they provide.
- 6.113 No formal objections have been made by the emergency services and officers continue to work closely with them and to address any issues as they arise.

### *Transport for London*

- 6.114 TfL has commented as follows
- 6.115 “Thank you for giving us the opportunity to comment on your plans for the permanent introduction of Low Traffic Neighbourhoods (LTNs) for Bounds Green, St Anns and Bruce Grove/West Green.
- 6.116 We welcome the proposed walking and cycling improvements inside the LTNs, and we feel your plans are aligned to our strategic objectives and will support people travelling around the area more sustainably. LB Haringey has been liaising with Transport for London (TfL) during the design, development and implementation phase and have been responsive to feedback from TfL in addressing issues and mitigating risks to ensure that road networks continue to perform effectively; this includes making sure that those travelling by bus are not negatively impacted. However, we still have concerns, and I will provide more detail on those below.
- 6.117 LTNs are a key part of the suite of measures that make up the Healthy Streets Approach for London. This approach is a key strand in delivering the outcomes of the Mayor’s Transport Strategy, enabling people to travel by sustainable, efficient and active modes, as well as achieving Vision Zero and Net Zero. The [evidence](#), as summarised by TfL here, demonstrates that by reducing motor traffic, LTNs enable people to walk and cycle more, and that streets within them experience a 50 per cent reduction in road casualties, with no change on their boundaries. TfL therefore provides funding and support to boroughs to deliver LTNs where they are well-planned and accompanied by high quality public engagement.
- 6.118 Across the three LTNs in Haringey the traffic count data shows how LTNs can reduce motor traffic including on the busiest internal roads found in the scheme areas such as La Rose Lane and Nightingale Road. This impact is consistent with similar schemes across London, so we would also expect the long-term outcomes to align with those recorded in our review of the evidence. That is, the roads within

the LTN feel and be safer with reduced collisions, active travel enabled with local people walking and cycling more and residents in the LTNs reducing car use. Behaviour change does not occur overnight, and time is required to assess a change in casualties, meaning these outcomes may not all be apparent at this point in the scheme monitoring, but could be anticipated over the long-term in the scheme areas.

- 6.119 The reduction of traffic dominance should also reduce pedestrian and cycle severance, making it easier and safer for people to choose these modes. Several roads across the LTNs are currently categorised as having ‘high severance’ within our Strategic Walking Analysis and the traffic counts suggest this may have reduced to ‘low severance’.
- 6.120 The traffic count data also shows that these LTNs can assist in delivery of new Strategic cycle routes. The Bounds Green and Bruce Grove LTNs encompass sections of routes identified by our Strategic Cycle Analysis that would now likely be in line with the Cycle Route Quality Criteria for cycling on mixed traffic roads. We are aware Haringey is developing a number of plans for cycleways and this includes between Tottenham and Crouch End that could build on the traffic changes in the Bruce Grove LTN and we would advise that further consideration is necessary on how to maximise cycling benefits by connecting the LTNs to existing cycleways. We note that the quality of consultation and engagement for the LTNs has been of a very good standard and we hope that the council adopt a similar approach to consultation and engagement for other active travel schemes that are yet to come forward. Our Local Communities & Partnerships team will work with you to support and amplify these, wherever possible.
- 6.121 While bus journey times on some internal roads have improved there are issues with bus performance on some boundary roads. To achieve the Mayor’s Transport Strategy target of 80 per cent of trips to be made by active, efficient and sustainable transport modes by 2041 bus journey time reliability is vital. Extensive research shows that if bus passengers are unable to guarantee a reliable journey time they will make fewer journeys by bus, and are likely to choose car-based modes, which adds to traffic congestion or not make trips at all.
- 6.122 Our iBus data shows clear instability in bus journey times since the trials began. Corridors that bus performance has not recovered to pre-LTN performance include Green Lanes, High Road, Seven Sisters Road, High Road (N17), Lordship Lane & Bruce Grove (Eastbound only), Lordship Lane East, West Green Road, Bounds Green Road, Brownlow Road and Pinkham Way Station Road (Southbound only). La Rose Lane and West Green Road, where bus filters are in place, have seen bus journey time improvements but are lower frequency corridors than others mentioned. We note the proposals to amend traffic filters in the Bruce Grove LTN at Linley Road, Moorefield Road and The Avenue and hope these will provide some mitigation<sup>17</sup>. We are also supportive of remedial measures such as those proposed

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<sup>17</sup> It is noted that these changes came into effect on 4 September 2023.

on West Green Road being taken forward and we want to continue to meet with you to monitor the data and establish effectiveness.

Haringey should continue to look at what they can do for buses in conjunction with TfL, where issues linked to the LTNs have been identified. For any similar future schemes Haringey should consider multi modal impacts at the outset and we would be happy to work with them at the earliest possible stage.”

### Conclusions, mitigation and complementary projects

- 6.123 The monitoring data shows a very significant reduction in motor vehicle traffic counted within the LTN (51% decrease), with minimal displacement (3% increase) to boundary roads.
- 6.124 Imperial’s DID method run on motor traffic suggests a reduction in volumes of both light vehicles and heavy vehicles from internal roads with a small increase in light vehicles on boundary roads and a larger decrease in heavy vehicles on boundary roads.
- 6.125 Cycling numbers have increased, despite poor weather during the post-LTN monitoring period. Considered alongside the dockless cycle hire data which has seen exponential growth in use, it is clear that the propensity to cycle to, from and within the LTN is increasing.
- 6.126 Vehicle speeds both within the LTN and on boundary roads have reduced, which has a direct impact on reducing road danger and creating more inclusive streets that support safer journeys for everyone, including vulnerable road users. Bus journey times have fluctuated but are generally improving, and proposals to help mitigate against any increase in journey time is discussed under paragraph 6.138 below.
- 6.127 There is no data to substantiate concerns that the LTN has had a negative impact upon crime or business. Studies have shown that businesses generally overestimate the number of customers arriving by car and investment in walking and cycling<sup>18</sup> can achieve considerable economic benefits, for example, by increasing retail spend (over a month, people who walk to the high street spend up to 40% more than people who drive), reducing absences and increasing productivity (people who are physically active take 27% fewer sick days each year than their colleagues).
- 6.128 Air quality monitoring data contained in Appendix A1 shows there have been limited changes in air quality across the scheme area and, where there is an increase, it is generally follows the boroughwide trend. Imperial’s analysis (Appendix A2) indicates that, while there has been an improvement in air quality on both internal and boundary roads relative to external sites, these differences are not statistically significant. The analysis does however demonstrate that the LTN scheme has not led to a deterioration of the local air quality on boundary roads. From this, it can be concluded that more needs to be done to encourage modal shift to sustainable

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<sup>18</sup> <https://tfl.gov.uk/corporate/publications-and-reports/economic-benefits-of-walking-and-cycling>

transport, which will also help reduce road danger and create better health outcomes and healthier streets.

- 6.129 Reducing road danger – by reducing motorised vehicle traffic – is important from a social justice perspective. TfL’s data demonstrates that road danger is also directly linked to levels of deprivation and data for Haringey indicates that those living in the most deprived areas are 1.4 times more likely to be killed or seriously injured than those living in the least deprived areas of the borough. It also shows that, within Haringey, people were 4 times more likely to be killed or serious injured travelling around the most deprived areas of the borough than the least deprived areas.
- 6.130 Some indicators, such as road traffic collisions, need to be monitored over a longer period (and over larger sample areas) to draw robust conclusions, noting that short-term data does show improvements. It is also important to note that, by reducing motor traffic volumes, the risk associated with road danger is also reduced. Longer-term cycling and walking counts will also enable a more granular level of detail about travel patterns and behaviour change as a result of the LTN and other interventions.
- 6.131 There were a broad range of views expressed through the consultation process - with high levels of engagement and those consulted engaging meaningfully in the process. While consultation results show mixed opinions, there is evidence of growing acceptance with improving views compared to the interim review. Importantly, respondents report increased levels of walking and cycling - key behavioural changes that align with the scheme's objectives. Further analysis shows that, unsurprisingly, the majority of people who are positive about the LTN are walking and wheeling more but, perhaps more surprising, is the fact that, of those who are negative about the LTN, a good proportion of them are walking/wheeling more.
- 6.132 The views expressed on the HGV ban on Downhills Way / Belmont Road (B155) indicated 45% felt more positive compared to 18% who felt negative about this trial.
- 6.133 One particular issue has arisen in regard to Broadwater Farm. It is reported that residents on the estate are at a particular disadvantage to others within the LTN, on account of their geographic position, ie the densely populated estate is situated at the very centre of Area A of the LTN, with limited road access points and further from their boundary road (Lordship Lane) than most. Furthermore, the area has very low PTAL (Public Transport Accessibility Level) of 1a and 1b. The council will undertake a review on access by motor vehicle for Broadwater Farm residents should the trial scheme become permanent.
- 6.134 The consultation results indicate a large proportion of carers and disabled people feeling that the LTN has not benefited them. It is important to note that Haringey already has one of the most extensive sets of exemptions in London, with all Haringey Blue Badge holders and professional carers being eligible for an exemption (subject to application).

- 6.135 Businesses also expressed strong views regarding the negative impacts of the LTN. Although their reported impact upon business does not align with the instore card spend data discussed in 6.1.67.
- 6.136 Alongside this, whilst the majority respondents do not support the LTN, the results of the public consultation do show an overall improving view of the LTN, when compared to the interim review. In line with some of the key outcomes sought through the implementation of the LTN, respondents reported increased levels of walking and cycling and increased levels of satisfaction about streets within the LTN.
- 6.137 As with any traffic scheme, the Council continues to monitor on an ongoing basis as part of its strategic monitoring programme and will continue to refine methodologies and build greater insights into how people travel within the borough.
- 6.138 The Council has an overall annual transport investment programme of approximately £5.4million per year. A proportion of this investment is directed to projects that are expected to help mitigate some of the localised impacts of the LTN:
- **West Green Road:** consulted on measures to help improve bus journey reliability. Measures include removal of parking bays where the road is too narrow to accommodate two-way traffic for larger vehicles like buses and the conversion of the corridor to a red route which would allow for effective enforcement through ANPR. The scheme would also include a parallel crossing east of Clinton Road. A decision on this is yet to be taken.
  - **West Green Road/Belmont Road junction:** Westbound traffic on West Green Road is invariably delayed by the presence of right-turning traffic queuing at the traffic signal-controlled junction with Belmont Road. To alleviate this, the Council will introduce a right-turn pocket on West Green Road at the junction with Belmont Road, subject to a decision following consultation and agreement with TfL.
  - **High Road N17:** Consideration is being given to measures that would help improve bus journey reliability. This is currently at feasibility stage and proposals are being discussed with TfL and ward councillors and are planned to be consulted upon in the coming months.
  - **Tottenham area red route:** Potential introduction of a red route to improve emergency service access through increased compliance.
  - **Walking and cycling infrastructure:** projects that aim to improve the pedestrian and cycle environment in the vicinity of the LTN.
  - **Adams Road:** An increase in traffic volumes was mitigated through introduction of two raised zebra crossings (completed summer 2024) to reduce road danger.
- 6.139 In addition to the above, other projects, programmes and communications are planned or underway that will further complement the LTN and/or contribute to the broader effort to improve local air quality:
- **School Streets:** 34 School Streets, bringing benefits to 16,000 pupils at 41 education establishments, are already in operation across the borough. The

programme continues to grow, with a further 16 currently in design, consultation and decision-making stages.

- **Healthy School Zones:** the ambition of the programme is to manage air pollution in the grounds and the buildings of schools that cannot have highway related interventions. Some schools on main roads or major bus routes cannot have interventions such as School Streets or LTNs and therefore the council has designed a Healthy School Zones approach. This can include LTN boundary roads. This programme, which is subject to funding, will look at delivering measures such as living walls and tree planting in the playgrounds, and air filtration systems on windows to reduce pollutants entering school classrooms.
- **Electric vehicle infrastructure:** the Council continues to facilitate the switch to ultra-low emission vehicles, across all vehicle types, by installing charging points, building public awareness of the benefits these vehicles can bring.
- **Tree planting:** the Council plans to plant trees more evenly across Haringey, increase the tree canopy cover to at least 30% in every ward and plant a further 10,000 trees by 2030.
- **Cycle hangars:** bike hangars provide safe, covered cycle parking on residential streets, replacing half a car parking space with up to six cycle parking spaces. This helps reduce car dependency and makes more efficient use of the limited kerbside space. 288 hangars have been installed across the borough with many more planned.
- **Traffic filter public realm improvements:** should the report recommendations be approved and subject to funding, a programme of work would take place to replace the existing trial planters with permanent features enabling further street greening and improvements to the streetscape.
- **Improving compliance:** subject to approval of this report, the Council's online maps will be improved to provide greater detail about each traffic filter and the exemptions that apply. This will assist with resident's and visitor's route planning and help improve compliance of the traffic filters.
- **Exemption communications:** further information and communications will be carried out, subject to approval of this report, regarding the availability of exemptions. This is to ensure that those who are eligible for an exemption know that they can apply and to provide help to them in applying.
- **Controlled Parking Zone (CPZ) boundaries:** subject to approval of this report, issues relating to the overlap of CPZ boundaries and LTN traffic filters will be assessed as part of the CPZ programme.
- **Street works / emergencies:** The Council currently has a protocol in place whereby some traffic filters are opened to ease congestion in the road network or allow local residents access to their properties in response to planned or emergency events on the road network close to the LTN. The council will endeavour to communicate any changes (such as opening traffic filters) as quickly as possible, noting that the council is not always notified about emergency works or road traffic collisions. This is communicated through road signs placed on roads which are opened informing the public that enforcement of that filter has stopped alongside other council messages. It is recognised that there is a need to consider greater flexibility in some situations and to review

existing protocol and endeavour to communicate any changes (such as opening traffic filters) as quickly as possible, noting that the Council is not always notified about emergency works or road traffic collisions.

- 6.140 Based on the comprehensive monitoring strategy and having taken into account all objection and feedback responses, officers consider that the LTN is, in general, meeting its objectives and recommend that the LTN is made permanent. Given the large size of the LTN, further benefits are expected to be realised over time and further work, such as the projects and programmes discussed above, will be required to assist the community with these Streets for People.

## **7. Contribution to the Corporate Delivery Plan**

- 7.1 The Corporate Delivery Plan (CDP 2024-26) sets out that “we believe residents deserve and flourish in safe, clean and green neighbourhoods. By taking steps to reduce carbon emissions in the borough, we play our part in safeguarding the future of the planet at the same time as promoting longer, healthier lives for the residents of today.”
- 7.2 The aim of the LTN aligns with the above vision. LTNs also contribute to the ‘Responding the climate emergency’ theme which includes the following outcomes:
- A greener Haringey
  - A zero carbon and climate resilient Haringey
  - Expanding active travel
  - Better air quality in Haringey

## **8. Carbon and Climate Change**

- 8.1 LTNs align with the overall transport objective contained within the Climate Change Action Plan<sup>19</sup> “Reduce emissions related to road transportation by 50% by 2025 by growing public and active travel options, low carbon travel options and infrastructure.”
- 8.2 LTNs contribute to reducing carbon emissions and mitigating climate change in the following ways:
- 8.3 Reduction in vehicle emissions: LTNs aim to decrease the number of cars and other motor vehicles passing through residential streets. By restricting through-traffic, LTNs encourage people to switch to more sustainable modes of transport such as walking, cycling, or using public transport. Fewer cars on the roads lead to a reduction in carbon dioxide (CO<sub>2</sub>) and other greenhouse gas emissions, which are major contributors to climate change.
- 8.4 Encouraging active travel: LTNs make local streets safer and more pleasant for pedestrians and cyclists by reducing motor vehicle traffic volumes. This promotes active travel, like walking and cycling, which not only reduces individual car usage

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<sup>19</sup> [final haringey climate change action plan - march 2021.pdf](#)

but also contributes to a healthier, lower-emission lifestyle for communities. As fewer people rely on cars for short trips, there is a long-term reduction in the demand for fossil fuels.

- 8.5 Reduced traffic congestion: LTNs reduce congestion by cutting down unnecessary through-traffic in residential areas. Congestion increases fuel consumption and emissions due to idling and stop-start driving. Smoother traffic flow means lower emissions from vehicles that still need to access these areas.
- 8.6 Shift in urban design: LTNs are part of broader urban planning strategies that prioritise sustainable development. They encourage a shift away from car-dominated city planning to a model that supports lower-emission transportation and greener public spaces. Over time, these changes can help create a more energy-efficient urban landscape with less reliance on cars, leading to sustained reductions in carbon emissions.
- 8.7 Public awareness: LTNs raise awareness about the environmental impact of transportation choices. They provide an opportunity to discuss sustainability, climate change, and the importance of reducing carbon emissions. This heightened awareness can influence future generations to make environmentally friendly decisions about transport.

## **9. Transport policy objectives**

- 9.1 The LTN aims to deliver policies and targets set within the Mayor of London's Transport Strategy (MTS). These policies and targets have since been adopted by Haringey Council through Haringey's Adopted Transport Strategy and Walking and Cycling Action Plan (2022).
- 9.2 The MTS uses the Healthy Streets Approach to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.
  - Mode share - 88 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 (77% in 2019)
  - Physical activity - all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041 (currently 32%)
- 9.3 The Council has a duty under section 122 of the Road Traffic Regulation Act (RTRA) 1984 to (so far as practicable having regard to certain specified matters) "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." Officers consider that the following matters are of particular relevance, given the objectives of the LTN, and that they point in favour of imposing the recommended ongoing restrictions:
  - LTNs provide access at all times to all road users. Access is maintained to motor vehicular traffic, although the route taken may have to change. Additionally, a range of exemptions are available within the LTN.

- LTNs restrict the passage of heavy commercial vehicles through internal LTN streets and so, in turn, preserve or improve the character and amenities of the area affected.
- Evidence from the LTN monitoring demonstrates that, in general, there is either limited change in air quality or where it has decreased it is generally in line with the boroughwide data. Therefore, the proposal has due regard to the national air quality strategy, prepared under section 80 of the Environment Act 1995.
- The LTN does not restrict the passage of public service vehicles.
- The LTN aims to address the risk of road danger by reducing the volume of traffic within the LTN. LTNs also aim to encourage modal shift (i.e. change short trips from car travel to active travel) and so reduce the overall volume of traffic on the road network, in turn, reducing the risk of road danger.
- Having balanced the various considerations, officers have concluded that the appropriate decision is to adopt their recommendations.
- The decision-making process also engages the network management duty in Traffic Management Act 2004 s16. Officers, in their capacity as the network management authority, have had in mind the s16(1) duty to manage the applicable road network with a view to achieving the objectives in s16(1)(a)-(b). But, like the s122(1) duty, this is not absolute. The duty to achieve, as described, is “so far as may be reasonably practicable having regard to their other obligations, policies and objectives”. This report sets out a range of such obligations, policies and objectives. Officers consider that their recommendations are consistent with and do discharge the s16(1) duty and that the appropriate course of action is to adopt their recommendations.

9.4 The LTN does include experimental amendments to waiting restriction traffic orders. These ETOs were considered necessary to complement the LTN filters so as to ensure that motor vehicles do not wait (park) in locations that might otherwise be dangerous or obstructive; for example, close to traffic filters.

## **10. Statutory Officers' comments**

### Finance

- 10.1 The cost of implementing the recommendations in section three above is approximately £20k. This will be funded from current Council Capital Programme plan under capital scheme reference number: 4014 - Walking and Cycling Action Plan (WCAP) LTN delivery.

### Strategic Procurement

- 10.2 Strategic Procurement has been consulted in the preparation of this report. Strategic Procurement notes the recommendations in section 3 of this report do not include a procurement decision.

### Head of Legal & Governance

- 10.3 The Head of Legal and Governance has been consulted in the preparation of this report and comments as follows:
- 10.4 As recorded above, the decision-making process engages a range of statutory provisions. The report demonstrates that the Council has had in mind the duty in s122(1) of the Road Traffic Regulation Act 1984, and discharged it. As well as having in mind the s122(1) duty, officers have had regard to factors pointing in favour of imposing a restriction on the movement referred to in s122(1) (especially certain kinds of motorised vehicular traffic movement). Officers have balanced the various considerations and concluded that the appropriate decision is to adopt their recommendations. The decision-making process also engages the network management duty in Traffic Management Act 2004 s16. The report also demonstrates that the Council has discharged this duty. Officers, in their capacity as the network management authority, have had in mind the s16(1) duty to manage the applicable road network with a view to achieving the objectives in s16(1)(a)-(b). But, like the s122(1) duty, this is not absolute as is explained above. The duty to achieve, as described, is "so far as may be reasonably practicable having regard to their other obligations, policies and objectives". This report sets out a range of such obligations, policies and objectives. Officers consider that their recommendations are consistent with and do discharge the s16(1) duty. Equality and human rights issues are discussed below.

### Equality

- 10.5 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act

- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not
  - Foster good relations between people who share a relevant protected characteristic and people who do not.
- 10.6 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/belief, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 10.7 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic
- 10.8 A revised<sup>20</sup> Equality Impact Assessment (Appendix D) has been carried out for this decision and is summarised below. This EqlA builds upon the three EqlAs that were previously approved and published alongside the:
- [Decision to implement the LTN on a trial basis](#) (December 2021)
  - [Decision to amend the exemption criteria](#) (July 2023)
  - [Decision relating to the interim review of the LTN](#) (July 2023)
- 10.9 While the LTN scheme has received feedback from residents on several grounds, they are in general deemed to serve the public interest, particularly regarding public health and safety. There are 4 major areas of impact for LTNs:
- 10.10 Reduction of vehicle induced air and noise pollution: In reducing the volume of traffic on streets, LTNs have positive benefits for all age groups through reducing air and noise pollution levels. This positively impacts health outcomes for all ages but particularly children, the elderly and pregnant women – all of whom are more vulnerable to poorer air quality. Haringey data also suggests that people from minority ethnic backgrounds are overrepresented in areas of deprivation where air pollution levels are higher than other areas. For these groups, this is a particular positive impact on their health and wellbeing.
- 10.11 Creating a safer environment on streets: Through reducing the volume of traffic on streets, areas where LTNs are operational, also provide a safer environment for walking, wheeling or cycling and greater safety while crossing streets. This benefits Black, Asian and other ethnic minority groups who are disproportionately likely to be injured in traffic collisions, young children who may enjoy a safer walking environment to/from school or play in their neighbourhoods, women who are disproportionately likely to be caring for children and older people who can cross streets with confidence and prevent further social isolation. LTNs also provide a safer environment for those with early dementia or Alzheimer's. People from minority ethnic groups are also more likely to be injured on the roads and the LTNs' traffic volume reductions could likely positively impact their health and road safety.

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<sup>20</sup> It is noted that this report recommends continuing the LTN on a permanent basis (which has been subject to three previously approved EqlA). Therefore, the equality impact of the LTN remains mostly unchanged from earlier decisions.

- 10.12 Encouraging active travel and wellbeing: LTNs encourage active travel through making street environments safer and less congested. Over time, this encourages more people to opt for cycling/wheeling or walking to their destinations where they are able to do so. Children who walk to school and care-givers (more likely to be women) also benefit from it. Older people and those with particular disabilities can also be more confident to cycle on streets without the possibility of encountering large volumes of traffic. These changes have incremental positive physical and mental health impacts for all these groups.
- 10.13 Increasing journey times for those travelling by car in the area – This is a negative impact of LTNs impacting particular groups with protected characteristics. Elderly people with conditions necessitating travel by car or some pregnant women needing to travel by car would be negatively impacted through increased travel time to their destination. Religious individuals who rely on cars to travel to their places of worship may also be negatively impacted. However, this inconvenience is partly mitigated through improved traffic conditions on boundary roads over time, where LTNs are implemented alongside measures to improve traffic flow through prioritised bus lanes, crossing points and cycle lanes. With time, this will lead to further reduction in private motor car use across the whole area including on the boundary roads as more people switch to active modes or use public transport, thereby cutting down on the currently increased travel times.
- 10.14 While the LTN may potentially impact certain residents' human rights—such as Article 1 of the First Protocol (the right to peaceful enjoyment of possessions), Article 8 (the right to respect for private and family life, home, and correspondence), and Article 14 (prohibition of discrimination)—the LTN (and the proposed permanent order) accords with the law, pursues a legitimate aim (particularly regarding public health and safety), is necessary and is proportionate. The Council is therefore entitled to make the proposed order. Scheme impacts are addressed in this section and in the updated Equalities Impact Assessment (Appendix D).
- 10.15 Over the period in which the proposals for the LTN and complementary measures were developed and throughout the trial, 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 anticipated potential impacts of the proposals on groups with protected characteristics are understood. Where potential negative impacts have been identified, reasonable 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, changes have been made to the LTN to address potential impacts including development of various exemptions e.g., for Haringey Blue Badge holders.
- 10.16 Making LTNs permanent also aligns with the Council's commitment to promote equality and reduce disparities among different groups. In providing mitigations and adopting a balance of interests, the Council seeks to further its commitments towards the public sector equalities duties.

## 11. Use of appendices

- Appendix A1 – Monitoring report (Systra)
- Appendix A2 – Monitoring report air quality and traffic (Imperial College London)
- Appendix B1 – Consultation report (public via CommonPlace)
- Appendix B2 – Consultation report (business perception)
- Appendix B3 – Consultation report (disabled people)
- Appendix B4 – Consultation report (carers)
- Appendix C – Traffic order objection themes and officers' recommended response
- Appendix D – Equality Impact Assessment
- Appendix E – LTN timeline
- Appendix F – High-level summary of monitoring data
- Appendix G – LTNs further reading
- Appendix H - Consultation and communication materials

## 12. Background papers

- 7/12/21 – [Cabinet approval to implement trial LTN](#)
- 25/7/22 – [Cabinet Member approval of LTN exemptions](#)
- 11/7/23 – [Cabinet approval to make permanent 6 School Streets in 3 LTNs](#)
- 11/7/23 – [Cabinet approval of LTN interim review](#)
- 11/7/23 – [Cabinet approval of Interim Review of LTN Exemptions Procedure](#)
- [Net zero carbon Haringey](#)