

## Appendix C – Traffic order objection themes and recommended response

Notes: Formal objections to the ETO (4 September 2023 to 3 March 2024) were analysed thematically. Each respondent was linked to themes they mentioned. Any duplicate themes for the same respondent were removed to ensure each theme was counted only once per respondent. The data below shows the summed count for each theme. It is noted that these counts reflect the total mentions of a themes rather than the number of individual respondents.

Copy of the objections is available for inspection by Cabinet Members by contacting [LTN@haringey.gov.uk](mailto:LTN@haringey.gov.uk)

Objection theme	ETO objection theme count	Recommended response
<b>LTN generates additional pollution and noise through extra vehicle trips, and has displaced vehicles from the internal roads onto boundary roads</b>  Recommend: Not Accept	367	<p>It is important to acknowledge the challenges and perceptions that arise during the implementation of LTNs. However, evidence shows that the LTN trial has successfully reduced motorised vehicle volumes within the scheme area. Between November 2021 and November 2023, internal roads experienced a 51% decrease in counted vehicles. Whilst some boundary roads have experienced increases in traffic volumes over the same time period, cumulative increases are substantially less than the reductions experienced on internal roads.</p> <p>Noise levels associated with motor vehicles are anticipated to correlate with variations in traffic volume and composition. Most roads within the scheme area are, therefore, expected to have experienced reduced noise levels, although some roads may encounter increased noise at specific times due to higher traffic volumes or changes in vehicle types. LTNs form a key component of the Council's broader strategy to decrease motor traffic across the borough, with the long-term aim of improving air quality and reducing noise pollution across all roads.</p> <p>Reductions in traffic volumes will also lead to an associated reduction in air and noise pollution associated with vehicular activity.</p> <p>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.</p> <p>Over time, the reduction in total vehicle numbers contributes to lower emissions and noise levels at both local and broader scales.</p> <p>The mitigation and complementary projects discussed in the report, alongside the existing availability of exemptions, are expected to help address any identified negative impacts. The Council remains committed to</p>

## Appendix C – Traffic order objection themes and recommended response

		monitoring the road network's performance and managing it in line with its statutory duties and adopted policies.
<b>LTNs Have a negative Impact on Road Safety / Safety</b>  Recommend: Not Accept	82	<p>London collision data is collected by the Metropolitan Police Service (MPS) and the City of London Police (CoLP) or reported to the police by members of the public. The reported data is then provided to Transport for London (TfL) and undergoes rigorous processing, including data validation checks, to ensure it meets the required standard when it is submitted to the Department for Transport (DfT) as a national statistics, known as STATS19.</p> <p>Collision data shows that the number of road traffic collisions on internal LTN roads has reduced by 56% between the 12 months before and the 12 months after the LTN was introduced. The number of collisions on boundary roads has dropped by 18% over the same time period. The report points out that a longer monitoring period will provide more robust data as to the LTN effect on collisions.</p> <p>Patterns of reported crimes before and after scheme implementation have remained similar. There is no indication that crime patterns within the LTN area have been impacted by the introduction of the LTN.</p>
<b>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</b>	200	<p>Whilst the motor vehicle route to some destinations may have had to change, as a consequence of the LTN, all businesses remain fully accessible.</p> <p>Data analysis does not indicate that footfall and instore card spend within the scheme area has been impacted by the introduction of the LTN. No causal relationship between the introduction of the LTN and instore card spend at businesses within or close to the LTN has been identified.</p> <p>With regards to unequal impacts to internal and boundary roads, the Bruce Grove West Green scheme is delivering its intended local impacts in terms of a reduction in motorised traffic volumes on internal roads without significant impact to most boundary roads. Benefits have been observed on both boundary and internal roads across a range of metrics: for instance, collisions have decreased by 56% of internal roads and by 18% on boundary roads, cycling levels increased overall (+33% on internal roads, +17% on boundary roads), and air quality has been negligibly impacted by the LTN across the scheme area.</p>

## Appendix C – Traffic order objection themes and recommended response

<p><b>the scheme may promote inequality)</b></p> <p>Recommend: Not Accept</p>		<p>With regards to increased inequalities within the scheme area, exemptions have been put in place to support those with a disability and who may rely on a motor vehicle. Exemptions for Haringey LTNs were extended to all Blue Badge holders in the borough, with 79% of applications approved, most permits issued to those under the Blue Badge or Individual Circumstance criteria, and a higher proportion of applicants from the more deprived east of the borough.</p> <p>Studies have shown that businesses generally overestimate the number of customers arriving by car and investment in walking and cycling 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).</p>
<p><b>LTNs should be removed</b></p> <p>Recommend: Not Accept</p>	86	<p>The 'Streets for People' initiative promotes a vision for thriving local streets, streets that are greener, safer and cleaner. Measures implemented seek to cut road traffic and pollution and improve the walkability and cyclability of local neighbourhoods. One of the key objectives, as set out in the Monitoring Strategy, is to reduce traffic volumes on residential streets within the study area. This, in turn, reduces road danger and creates streets that are more attractive for people to walk and cycle.</p> <p>Traffic count data indicates the LTN is achieving this objective.</p> <p>The Council's Walking and Cycling Action Plan (WCAP) sits under the overarching Haringey's Adopted Transport Strategy and the Mayor of London's Transport Strategy. The WCAP sets out the Council's vision:</p> <ul style="list-style-type: none"> <li>• Walking and cycling are natural choices</li> <li>• active travel will improve the wellbeing of our residents, reducing obesity and improving air quality</li> <li>• reduce motor vehicles use for short trips with a shift to active travel</li> </ul> <p>The WCAP identifies (Policy 4) that the Council will deliver a network of LTNs across the borough and specifically identifying Bruce Grove West Green.</p> <p>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."</p> <p>The aim of the LTN aligns with the above vision. LTNs also contribute to the 'Responding the climate</p>

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		<p>emergency' theme which includes the following outcomes:</p> <ul style="list-style-type: none"> <li>• A greener Haringey</li> <li>• A zero carbon and climate resilient Haringey</li> <li>• Expanding active travel</li> <li>• Better air quality in Haringey</li> </ul> <p>As set out in the Cabinet Report, 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 will be required to assist Council's vision</p>
<p><b>Modify the LTNs (improved street design features, junction management, enforcement, further consideration regarding exemptions)</b></p> <p>Recommend: Not Accept</p>	53	<p>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.</p> <p>However, the report does make clear that 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. As such, there are a range of further projects and programmes that are being considered that intend to mitigate any negative impacts the LTN may have had.</p> <p>It is noted that, following extensive engagement and research, the Council has developed a Low Traffic Neighbourhood Exemptions Criteria and Application Process, which allows exemptions to be issued enabling certain groups or people with specific characteristics to pass through the traffic filters in a motor vehicle. Further details can be found here: <a href="https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/haringey-streets-people/low-traffic-neighbourhood-exemptions">https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/haringey-streets-people/low-traffic-neighbourhood-exemptions</a></p> <p>The Council will continue to monitor traffic levels and seek to deliver projects that complement the LTN</p>
<p><b>LTNs have been implemented without considering the public's preferences</b></p> <p>Recommend: Not Accept</p>	74	<p>Prior to launch of the LTN trial, three stages of engagement were carried out which helped shape the design of the LTN. The LTN was then introduced on an experimental basis with provided a statutory 6-month objection period.</p> <p>In 2023, an interim review of the LTN was carried out which included consideration of any objections as well as a wider public consultation. Following a listening exercise, the Blue Badge exemptions which applied to</p>

## Appendix C – Traffic order objection themes and recommended response

	<p>those who lived inside and the immediate boundary of the LTN were extended to all Haringey blue badge holders; these came into effect on 4 September 2023.</p> <p>More recently, as part of the final review, a range of consultations were carried out in July, August and September 2024 through a public CommonPlace survey, business perception surveys, disabled people survey and a survey of carers.</p> <p>At a broader level, the Council's Walking and Cycling Action Plan was subject to 9-week consultation in 2021/22.</p> <p>As noted in the report, there was a broad range of views expressed through the consultation process - with high levels of engagement through the public survey - 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.</p> <p>At all stages of consultation, the Council has considered all feedback and objections prior to taking a decision.</p>
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