Haringey Council Written Statement/Record of a decision made by an officer under delegated authority

Decision Maker (Post Title)	Head of Highways and Parking following consultation with the Cabinet Member for Tackling Inequality and Resident Services	
Subject of the decision	To determine if the proposed extension of the 20mph speed limit on Bounds Green Road, should proceed to statutory consultation, following an informal public consultation exercise.	
Title of scheme	Bounds Green Road – Proposed Extension of 20mph Speed Limit	
Reasons for the decision	The proposed speed reducing measures are aimed at reducing vehicle speeds and improving road safety for all road users.	
	Cabinet Member for Tackling Inequality and Resident Services has been consulted on the recommendations:	
Cabinet Member consultation		
	Signature:	
Decision	To approve recommendations as set out in Section 3 of this report.	
	Approval by Ann Cunningham, Head of Service for Highways and Parking	
	Signature: Aluminghoum	
	Date: 22/09/2025	
Details of any alternative options considered and rejected by the officer when making the decision	Do nothing. This option was not progressed as safety at this location would not be addressed.	
Details of any exemptions	None	

Conflicts of interest – Executive decisions Details of any conflict of interest declared by a Cabinet Member who is consulted by the officer which relates to the decision and details of dispensation granted by the Council's Head of Paid Service	None
Conflicts of interest – Non	
executive decisions Where the decision is taken under an express delegation e.g. by a Committee, the name of any Member who declared a conflict of interest in relation to this matter at the committee meeting	None
*Legal Comments Provided by:	Justin Farley, Senior Lawyer (Legal Officer)
*Financial Comments Provided by:	Emmanuel Atuanya, Principal Accountant
*Equalities Comments Provided by:	Zainab Mohamed, Policy and Equalities Officer
*Procurement Comments Provided by:	N/A
Number of Appendices included	4

Exempt Information

Local Government Act 1972 Schedule 12A

Part 1: Descriptions of Exempt Information

- 1. Information relating to any individual.
- 2. Information which is likely to reveal the identity of an individual.
- 3. Information relating to the financial or business affairs of any person (including the authority holding that information).
- 4. Information relating to any consultations or negotiations or contemplated consultations or negotiations in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
- 5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
- 6. Information which reveals that the authority proposes -
 - (a) To give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
 - (b) To make an order or direction under any enactment.
- 7. Information relating to any action taken or to be taken in connection with the prevention, investigation, or prosecution of crime.

Note: It is insufficient to simply identify a category of exemption, you must also conduct a public interest test on the basis specified in the Act as follows:

Information falling within categories 1-7 is exempt if and so long as in all the circumstances of the case the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Confidential Decisions

- 1. The decision contains information provided by a Government department on a non disclosure basis
- 2. There is a Court order against disclosure

Report for: Head of Service for Highways and Parking following consultation with

the Cabinet Member for Tackling Inequality and Resident Services

Title: Bounds Green Road – Proposed Extension of 20mph Speed Limit

Report

authorised by: Simi Shah, Group Manager Traffic and Parking Projects

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Report Author: Danny Gayle, Traffic Engineering Manager

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Ward(s) affected: Bounds Green

Report for Key/

Non-Key Decision: Non-Key Decision

1 Describe the issue under consideration

- 1.1 To determine if the proposed extension of the 20mph speed limit on Bounds Green Road by approximately [1,700] metres from Braemar Avenue and the North Circular Road, should proceed to statutory consultation, following an informal public consultation exercise.
- 1.2 To request that the objections received as part of the informal consultation **and officer's** views regarding those objections be considered and approval be given to proceed to statutory consultation.

2 Cabinet Member Introduction

2.1 N/A

3 Recommendations

The Head of Highways and Parking following consultation with the Cabinet Member for Tackling Inequality and Resident Services is asked to:

- 3.1 Consider all feedback received regarding the informal public consultation carried out from 26 November to 16 December 2024 set out in Appendix D, on the proposals outlined in Appendix A, together with officers' views regarding that feedback set out in paragraph 8.2 of this report.
- 3.2 Approve the undertaking of a statutory consultation, as set out on the plan in Appendix B.

4 Reasons for decision

- 4.1 The Council as a local authority has a duty under Section 39 of the Road Traffic Act 1988 to prepare and carry out a programme of measures designed to promote road safety and carry out studies into accidents arising out of the use of vehicles and must in the light of those studies, take such measures to prevent such accidents. The proposals consulted upon will help reduce vehicle speeds and improve road safety for all road users, which will assist in reducing personal injury collisions.
- The decision does not result in a contract being awarded or expenditure in excess of £500,000 being incurred nor any virements, so it is not a key decision for that reason.

- 4.3 The decision also relates to only one ward and so it is not a key decision for that reason because the effects of the scheme will not have a significant impact on communities living or working in an area comprising two or more wards in the borough.
- The total cost of the scheme is circa £200,000 and funding is assigned through the agreed capital programme scheme 335-Streetspace Plan (SCIL) Programme.

5 Alternative options considered

5.1 Do nothing. This option was not progressed as road safety at this location would not be addressed.

6 Background Information

- 6.1 Haringey Council regards road safety as a high priority and actively promotes road safety measures across the borough to reduce vehicle speeds, the number of road traffic collisions and to enhance the environment for all road users.
- Haringey's Road Danger Reduction Action Plan supports the Mayor's London-wide ambition to reach 'Vision Zero', by having no killed or seriously injured (KSI) casualties on Haringey's roads by 2041; and supports the Council's own ambition to reduce all casualty types (KSIs and 'slight' injuries) with specific attention to vulnerable road users.
- The speed limit on Bounds Green Road from High Road N22 to Braemar Avenue was lowered from 30mph to 20mph, as part of the introduction of the borough-wide 20mph speed limit in 2016. However, the speed limit on Bounds Green Road between Braemar Avenue and the North Circular Road remained as 30mph.
- Officers investigated the collision data for 3 years up to April 2024 on Bounds Green Road between Braemar Avenue and the North Circular Road, which revealed that there were 40 slight and 4 serious recorded road traffic collisions.
- The Council is proposing to lower the remaining 30mph section of Bounds Green Road, between Braemar Avenue and the North Circular Road to 20mph.
- 6.6 Details of the proposals are listed below and set out on the plan in Appendix B:
 - Reduction of the speed limit on Bounds Green Road between Braemar Avenue and the North Circular Road from 30mph to 20mph.
 - Installation of raised tables along Bounds Green Road.
 - Installation of 2 x Vehicle Activated Signs

The objective is that the traffic calming measures will slow vehicles down to speeds below or at the limit, so that the 20mph limit effectively becomes 'self-enforcing'.

6.7

In accordance with the section 122 duty under the Road Traffic Regulation Act 1984, officers have considered factors relevant to securing the expeditious, convenient, and safe movement of traffic, including pedestrians, and ensuring suitable and adequate parking facilities. Particular attention has been given to maintaining the safe and convenient movement of pedestrians along the Council's road network, facilitating the passage of public service vehicles, and supporting the objectives of the proposal to extend the 20mph speed limit along Bounds Green Road. These considerations are

aligned with the duty to balance accessibility, air quality objectives, and traffic efficiency.

7 Consultation

- 7.1 Ward Councillors were informed about the proposals on 14 November 2024. No comments were received.
- Public consultation documents were distributed to properties in the vicinity of the proposals on 25 November 2024. A copy of the public consultation document is attached as Appendix A (Letter and questionnaire) together with the consultation plans as Appendix B and a copy of the consultation boundary can be found in Appendix C.
- 7.3 The public consultation documents were also uploaded on the Council's website.

8 Responses to Consultation

8.1 The full consultation report from which table 1 was extracted, is attached as Appendix D.

Table 1 – Public Consultation Analysis

	as a	Count	%
Support or object?	Support	16	37%
	Object	22	51%
	Other / Don't know	5	12%
	Total	43	100%

- The Council received 43 responses during the public consultation period, 16 (37%) in support, 22 (51%) in objection and 5 (10%), who had other views on the proposals.
- 8.2.1 Objection 1 The Council is unfairly targeting or criminalising law-abiding motorists

Some residents felt that reducing the speed limit to 20mph punishes drivers who already obey traffic laws. Concerns were raised that motorists are being made to "pay for the bad choices of others" and that "decent citizens" should not be penalised with even lower speed limits. Objectors referred to the costs of motoring (insurance, tax, etc.) and stressed that going "1 or 2 miles over" the limit could lead to undue fines and stress, especially where speed limits constantly change.

Officer Response

The Council as a local authority has a duty under Section 39 of the Road Traffic Act 1988 to improve road safety and reduce road traffic collisions. The proposed extension of the 20mph speed limit, is not intended to punish law-abiding drivers, but to improve road safety for all road users, especially the vulnerable and less able.

Drivers who travel at higher speeds have less time to identify and react to what is happening around them. It takes longer to stop, and if they are involved in a collision, it is more severe, causing greater injury to the occupants and any pedestrian or rider they may potentially hit. The extension of the 20mph speed limit on Bounds Green Road, coupled with the proposed traffic calming measures, will create safer conditions in which drivers naturally choose to drive at around 20mph. Vertical deflections in the carriageway such as speed tables are one of the most effective, reliable and cost-

effective speed reduction measures currently available. The principle is that the traffic calming measures will slow vehicles down to speeds below or at the limit.

Transport for London undertook an analysis of the long-term impact of 20mph speed limits on borough roads across London. The study examined over 150 schemes introduced between 1989 and 2013 and the results indicated that lower speed limits have played a significant role in reducing road danger.

Key findings - compare scheme roads to background trends across borough roads:

- 40% reduction in people killed (from 15 to 9) compared to 7% fewer fatalities
- 34% reduction in people killed or seriously injured (from 395 to 260) compared to a 15% fall in people killed or seriously injured
- 75% reduction in children killed (from 4 to 1) compared to no change
- 35% reduction in collisions and 36% reduction in casualties compared to 12% fewer collisions and casualties

This suggests there are clear safety benefits to reducing maximum speeds on London's roads.

8.2.2 Objection 2 – Traffic speeds are already low; lowering the speed limit will further increase congestion and pollution

A number of respondents have stated that Bounds Green Road already suffered from traffic congestion and that the Bounds Green Low Traffic Neighbourhood (LTN) has diverted even more traffic onto this busy corridor. Therefore, during peak times, traffic already moves below 20mph, making any speed limit reduction unnecessary. Others have stated that the proposed speed limit reduction could make journeys slower, creating further congestion and adding to pollution from idling vehicles.

Officer Response

It is noted that during the peak periods, vehicular speeds along Bounds Green Road, which is classified as an 'A' road can be low, as this road is intended to carry large volumes of traffic. However, during the off-peak periods, when there is less traffic on the road, vehicular speeds can increase.

The proposed extension of the 20mph speed limit, coupled with the vertical deflections in the carriageway (speed tables) will slow vehicles down to speeds at or below the speed limit, and in this way the 20mph limit will become 'self-enforcing', which will improve road safety, for all road users.

8.3.3 Objection 3 – Speed humps (raised tables) cause noise, disruption, and damage

Several residents objected to the raised tables, citing increased noise and vibration issues, especially at night, and potential property damage from vehicle impacts. They also expressed concerns about damage to vehicle suspensions and discomfort for passengers on buses when driving over these features. Suggestions were made to reduce the number of raised tables or adopt alternative measures.

Officer Response

When considering the use of road humps, the Council relies on data provided by the Department of Transport, who commissioned the Transport Research Laboratory (TRL) to carry out track trials to assess the effects which road humps might have in generating ground-borne vibrations when vehicles are driven over them for a sustained period. The

results were used to calculate minimum distances, which would be desirable for road humps to be sited from dwellings, according to different soil types.

This study showed that even very minor hairline cracking should not occur unless the road humps are placed less that 2m from the dwelling (for London Clay soils type – such as Bounds Green Road). The speed tables (road humps) for this scheme adhere to the recommendations from this study.

The proposed road humps will conform with the parameters set out in The Highways (Road Humps) Regulations 1999, which sets a height of between 25mm and 100mm. Information on the legal requirements for speed humps are set out in the Highways (Road Humps) Regulation 1999. The proposed raised speed tables along Bounds Green Road will be in line with the Council's standard height of 75mm and spaced at regular intervals. This height along with the spacing has proved to be successful in reducing traffic speeds whilst limiting the impact of noise and vibration to neighbouring properties.

The proposed raised tables will be built to bus-friendly specifications, which will conform with Bus Priority Team technical advice note BP2/05. This type of speed table has been used on bus routes in other roads within the borough. Moreover, as part of the statutory consultation process, LT Buses will be consulted and any feedback received from them will be considered.

Road humps do not cause undue damage to vehicles, injure motorists or cause discomfort for vulnerable road users if negotiated at the correct speed. Drivers who choose to drive over them at excessive speeds potentially risk damage to their vehicles, usually in the form of suspension or tyre issues.

The speed at which **drivers'** approach and negotiate the humps should take into account the road layout and also vehicle type. The Highway Code states that 'the speed **limit is the absolute maximum'** and does not mean it is safe to drive at that speed irrespective of conditions. Driving at speeds that are inappropriate for the road, vehicle and traffic conditions can be dangerous for both the motorist, passengers and other road users.

8.3.4 Objection 4 – A 20mph limit is unnecessary: unclear link to collision history

Some respondents commented that the recorded personal injury collisions were not necessarily caused by speeding. They questioned whether a lower speed limit would have prevented those collisions, taking into account that Bounds Green Road is relatively wide and benefits from good visibility splays. Others felt that advances in vehicle safety technology should reduce the need for lowering speed limits on main roads.

Officer Response

According to a recent survey undertaken by Transport for London (TfL), speed is still the most common factor in a collision that results in death or serious injury. Each year in London more than 1000 people are injured or killed by drivers exceeding the speed limit - often on roads with lower speed limits (20/30mph). If a pedestrian is hit at 30mph, they are five times more likely to die than if a pedestrian is hit at 20mph. These statistics are available from TfL's website. Officers consider reducing maximum speed limit to 20mph will provide consistency in driver speed as the rest of the road is already subject to 20mph.

8.3.5 Objection 5 –The scheme is a money-making exercise and a waste of taxpayers' funds

Some respondents described the proposals as "vanity projects" intended to generate revenue from speeding fines. Others believed the funds would be better spent elsewhere, suggesting the Council was "interfering unnecessarily" in residents' lives. Concerns were also raised that repeated changes to the road network have already cost taxpayers too much.

Officer Response

The Road Danger Reduction Action Plan supports the Mayor's London-wide ambition to reach 'Vision Zero', by having no killed or seriously injured (KSI) casualties on Haringey's roads by 2041; and supports the Council's own ambition to reduce all casualty types (KSIs and 'slight' injuries).

The speed at which a vehicle travels is a major factor in the level of danger it poses to other road users and the occupants themselves. Speed significantly increases the chance of severe injury or death in a collision, especially when the collision involves a vulnerable road user. The Royal Society for Prevention of Accidents reports that there is a 1.5% chance of being fatally injured in a 20mph collision versus an 8% chance at 30mph.

The majority of roads in Haringey are 20mph now, following the introduction of a borough-wide 20mph speed limit in February 2016. However, there are still some parts of the borough road network which are either 30mph or 40mph. The Council's intention is to reduce the speed limit to 20mph on all borough roads in Haringey not currently ascribed that speed limit. 10 other roads have recently been approved to have speed reduced to 20mph, these are planned to be implemented in September 2025. There are a very limited numbers of roads still to be addressed.

8.3.6 Objection 6 – LTNs increase traffic on Bounds Green Road; side roads also need attention

Several respondents suggested that LTNs or road closures in the area have diverted traffic onto Bounds Green Road, causing congestion and potentially encouraging some drivers to use other residential side streets i.e. Tewkesbury Terrace, Trinity Road, as "rat-runs." Concerns were raised about speeding in these side roads and requests were made to introduce further measures to protect local residential streets.

Officer Response

The Council recognises the interaction between main roads and local LTNs. This proposal aims to improve the overall safety on Bounds Green Road, which serves as a key corridor. Any additional traffic calming on side roads would need separate funding, feasibility studies, and consultation with those residents.

9 Contribution to the Corporate Delivery Plan 2024-2026 high-level strategic outcomes

- 1.1 9.1 The reduction of the speed limit on Bounds Green Road between Braemar Avenue and the North Circular Road from 30mph to 20mph including the installation of raised tables and 2 x Vehicle Activated Signs supports the delivery of the Haringey Corporate Delivery Plan and contributes to the following themes:
 - Resident Experience and working together
 - A Safer Haringey

- Responding to the climate emergency
- It also supports the delivery of the **Council's** Road Danger Reduction Action Plan action, by reducing vehicular speed and improving road safety and support the delivery of the **Councils' wider** <u>Transport Strategy</u>, encouraging walking, reducing speed, encouraging cycling as road users will feel more confident and safe.

10 Carbon and Climate Change

- 10.1 The scheme will help contribute positively to carbon emission reduction and mitigate climate change in the following ways:
- 10.1.1 Improving road safety: Improving road safety through reduction in motor vehicle speeds. This will reduce greenhouse gas emissions.
- 10.1.2 Reducing motor vehicle speeds: This may encourage switch to other active modes as the journeys undertaken by motor vehicle might increase for those not adhering to the speed limit.

Statutory Officers' comments

11 Comments of the Chief Financial Officer

This report seeks the approval to Bounds Green Road – Proposed Extension of 20mph Speed Limit. The total cost of the scheme is c.£200k, which will be funded via the Council's capital programme plan, under capital scheme 335 – Streetspace Plan (SCIL) Programme.

12 Comments of the Assistant Director of Legal and Governance

- Traffic calming measures involving the installation of road humps are authorised by section 90A of the Highways Act 1980 and must comply with the Highways (Road Humps) Regulations 1999. Introducing speed limits via a traffic order are authorised under section 84 of the Road Traffic Regulation Act 1984.
- 12.2 Before speed limits are implemented, the Council must undertake a consultation in accordance with the Local Authorities' Traffic Orders (Procedure)(England and Wales Regulations 1996 which includes consulting with the parties listed in regulation 6 of the Regulations and placing/publishing notice of the proposal(s) and making the draft order/notice available for inspection at its offices.
- 12.3 When a consultation has been undertaken, even where the consultation has not been undertaken because of a statutory requirement to do so, the Council must take into account the representations received in response to that consultation when taking a decision. The consultation responses received are sent out in Appendix D to this report and officers' consideration of the same set out in section 8.3 of this report which must be taken into account before the decision whether to implement the speed reduction measures /make the necessary traffic orders is taken. A judgment is to be exercised as to how much weight each representation should carry and whether or not to approve any of the measures in the proposals in light of those representations.

- 12.4 The Courts have held that a decision maker must consider consultation responses with 'a receptive mind' and be prepared to change course if persuaded by a response, but is not under a duty to adopt the views of consultees.
- 12.5 Section 122 of the RTRA requires the Council to have regard to factors pointing in favour of imposing a restriction on the movement of traffic and those pointing in favour of securing the convenient and safe movement of such traffic, balancing the various considerations and concluding that the restrictions represent an appropriate outcome.
- 12.6 The factors which have pointed in favour of installing road humps/ introducing speed limits are set out in paragraph 6.8 of this report.
- 12.7 The decision to approve the undertaking of a public consultation on the proposal to reduce the speed limit on Bounds Green Road between Braemar Avenue and the North Circular Road from 30mph to 20mph including the installation of raised tables and 2 x Vehicle Activated Signs is an executive decision that can be exercised by the Head of Highways and Parking in accordance with the Council's Constitution and delegation given by the Director of Environment and Resident Experience in this scheme of delegation dated 14 October 2024.

13 Equality Comments

- 13.1 The council has a Public Sector Equality Duty (PSED) 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 protected characteristics and people who do not.
 - Foster good relations between people who share those characteristics and people who do not. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.
- 13.2.1 The decision outlined in this report is approve the reduction of the speed limit on Bounds Green Road between Braemar Avenue and the North Circular Road from 30mph to 20mph including the installation of raised tables and 2 x Vehicle Activated Signs as outlined in appendix B.
- 13.2.2 A public consultation opened on 26 November 2024, with relevant documents (see Appendixes A-C) distributed to all households and businesses within the vicinity of the proposals.
 - 43 responses were received to the consultation. Of these, 16 (37%) were in support, 22 (51%) objected, and 5 (12%) provided other views or did not state a preference.
 - Within the 22 objections, most concerns focused on the perceived impact of the proposals on traffic congestion, noise, and pollution, as well as questions

regarding the effectiveness of raised tables versus other traffic-calming measures, and the overall use of public funds.

- One response indirectly addressed the potential effects on groups with protected characteristics, arguing that introducing raised tables could exacerbate congestion, noise, and pollution on Bounds Green Road, disproportionately affecting certain vulnerable residents.
- Officers have responded by highlighting that the design aims to maintain consistent vehicle speeds, reducing the need for harsh braking and acceleration—key contributors to noise and air pollution. Furthermore, the proposed raised tables will feature a sinusoidal profile, designed to minimize noise and vibration while still effectively lowering speeds.
- 13.4 Due consideration has been given to the impacts the decision will have on groups with protected characteristics:
 - Age: The decision will have a positive impact on the road safety of certain age groups, namely children and the elderly, by reducing traffic speeds. For the 10% of Bounds Green residents who are aged 65+ (Haringey Ward Profiles, 2024), this will reduce the likelihood of their potentially slower mobility preventing them from crossing the road safely. Likewise, by ensuring that drivers slow down, children are at less risk of harm if they step out into the road unsupervised.
 - **Disability:** The traffic calming measures proposed in this report could benefit the of 7.5% Bounds Green residents who are disabled (Haringey Ward Profiles, 2024), particularly those in wheelchairs. This is because the risk of a traffic accident causing physical harm is dramatically reduced when vehicle speeds are lower.
 - Sex: On average, women spend a higher proportion of their time caregiving to children than men (ONS Census, 2021). Therefore, the positive effect of the speed reduction on children's road safety will have positive implications for women.
 - For other groups with protected characteristics, this decision will have a neutral impact.

14 Use of Appendices

- Appendix A Public consultation letter
- Appendix B Public consultation plan
- Appendix C Consultation Boundary
- Appendix D Full consultation report

15 Background Papers

None