



ADVANCED PUBLICATION OF REPORTS

This publication gives five clear working days' notice of the decisions listed below.

These decisions are due to be signed by individual Cabinet Members
and operational key decision makers.

Once signed all decisions will be published on the Council's
Publication of Decisions List.

- 1. THREE EMERGENCY ACCESS CAMERA SITES (Pages 1 - 26)**

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London Borough of Enfield

Portfolio Report

Report of: Head of Traffic and Transportation

Subject: Three Emergency Access Camera Sites

Cabinet Member: Cllr Guney Dogan

Director: Doug Wilkinson

Ward: Bush Hill Park, Edmonton Green, Town

Key Decision: Non KD

Purpose of Report

1. To recommend proceeding with the introduction of emergency access gaps controlled by fixed cameras and No Motor Vehicles signs at two sites where physical measures presently deny or delay access for ambulances and larger emergency vehicles: Firs Park Avenue and Montagu Gardens. Also to recommend not proceeding with a similar proposal at Ladysmith Road in light of high levels of public concern.

Proposals

2. Enfield Council published draft Traffic Management Orders and undertook a statutory consultation in July 2020 on proposals at three sites: Firs Park Avenue, Montagu Gardens and Ladysmith Road, as seen in the consultation letters at the appendices.
3. The proposal at **Firs Park Avenue** is to replace the existing lockable barrier situated between the two width restricted lanes with a gap controlled by No Motor Vehicles signs and a fixed camera. The estimated cost of the alterations is £30,000, including the estimated £25,000 for the supply and installation of the camera. **It is recommended that the proposal be taken forward.**
4. The proposal at **Montagu Gardens** is to create an emergency vehicles bypass route controlled by a similar combination of signs and camera as above. The road is not wide enough for the existing pair of width restriction lanes to feature a central access gate. However, access for fire engines etc. could be provided by splitting the combined width restriction feature into two – one inbound, one outbound – and offsetting them far enough along the road from each other that a fire engine could weave between the two features and gain access in or out by utilising the two points controlled by the No Motor Vehicles signs. The estimated cost of the alterations is £33,000, including the estimated £25,000 for the supply and installation of the camera. **It is recommended that the proposal be taken forward.**

5. The proposal at **Ladysmith Road** was to remove the standalone lockable barrier – introduced historically to curtail excessive levels of all through-traffic, not just large commercial vehicles – and leave the resulting gap to be controlled by No Motor Vehicle signs and a fixed camera. The estimated cost of the alterations was £30,000, including the estimated £25,000 for the supply and installation of the camera. **It is recommended that the proposal be discontinued.**
6. Common to all three sites is the provision of a physical gap that can be used by large emergency vehicles when access is required, with the use of No Motor Vehicles signs and a fixed camera to provide continuous enforcement activity and thus a strong deterrent against misuse by other drivers.
7. In all cases the draft Traffic Management Orders are explicit that the gaps may be used by vehicles operated by the emergency services only and solely in emergency events, with no exemptions for refuse collection vehicles and so forth.
8. The penalty for drivers found breaching the restriction is £130, discounted to £65 if paid within 14 days. The camera system operates automatically at all hours. The issue of a Penalty Charge Notice (PCN) occurs when the system notifies staff of an incident. An operator then reviews the footage before processing the PCN.

Reason for Proposals

9. Width restrictions are an effective measure to deny a route for large vehicles through residential areas. Without such measures the presence of trucks etc in notable numbers risks acting as a deterrent to neighbourhood walking and cycling, and may degrade road surfaces, create excessive noise at traffic calming features, and pose undue danger or obstruction to other road users. Signed weight limits on vehicles over 7.5 tonnes also feature across local roads but the necessary allowance for any such vehicle to gain legitimate entry to an estate for the purpose of access makes enforcement activity by any one agency very challenging.
10. The key drawback of placing width restrictions on the network is that they hinder emergency access. Fire engines can only pass if a lockable barrier is provided as part of the arrangement. These, in turn, can pose delay to a fire crew as well as creating maintenance problems, opportunities for misuse by other drivers and the hazard to the wider public of barriers being left swinging open. The latter two issues have been reported with some regularity by residents of Ladysmith Road, for example.
11. Engagement with London Ambulance Service (LAS) on the subject of width restrictions has identified sites where they see a need for strategic access. Removing a physical feature at such sites will tend to improve the permeability of the network for their crews or improve response times into particular areas of housing. This leaves scope for modal filters and similar to be placed at sites of secondary importance. LAS has advised that their new fleet of ambulances will typically not fit through a width restriction and that their crews do not carry keys for lockable barriers but divert around such features instead. The view of LAS on this topic is particularly pertinent as they have many more vehicles on the network than London Fire Brigade (LFB) and their crews are called out on emergency incidents 300 to 400 times more frequently than are London's fire crews. Ambulance crews often need to proceed in haste on both their inbound trip to reach the patient and their outbound trip to convey them to a medical centre.
12. Where a barrier is placed for the purpose of denying a route to all traffic, not just larger vehicles – as in the case of Ladysmith Road – the same issues apply.

13. A period of engagement with the emergency services commencing in 2019 on the Council's wide-reaching aspirations for quieter neighbourhoods has led to a better understanding across the department of the LAS perspective on emergency barriers. Hitherto they were viewed within the department as an important component of a closure or width restriction when a route offered strategic access but viewed as offering little disbenefit when in service. LAS officers with oversight of Enfield's network have now taken the opportunity to underline in meetings the points stated in Paragraph 11 above, and the organisation has subsequently issued some London-wide guidance to highway authorities on, amongst other matters, the difficulties posed to LAS crews by barriers at strategic access points.
14. Further to the above LAS has set out that their target response time for a cardiac arrest is 7 minutes less 90 seconds operator/dispatch time. The estimated 60 second delay LAS attributes to delays posed by barriers thus being proportionally significant, in addition to being a long time from the perspective of the casualty whose breathing as stopped or whose brain is receiving too little oxygen.
15. The department provided LAS with a map in November 2019 showing the 11 lockable barriers presently sited on the network at closure points and the 13 width restrictions. Firs Park Avenue is an example of where a cluster of width restrictions is placed. The one on Firs Park Avenue denies entry by larger vehicles via the most strategic access route into the estate, but three further were needed to avoid drivers simply diverting via other entry points. The proposals discussed herein derive from the department's invitation to LAS to advise of the three sites that posed greatest concern.
16. The technological advance that has allowed the department to make this offer, and to propose further access controls under Quieter Neighbourhood schemes, is the greater affordability and ease of installation of traffic cameras. Where previously cameras needed to be mounted on wide-based bespoke masts, they can now be affixed to a conveniently sited lamp-post with installation costs of around £200.
17. It can be calculated that issuing PCNs of £65 at a rate of one per day equates to annual revenue approaching the £25,000 purchase cost of the camera. It can thus be understood that a camera system will tend to pay for its installation costs in just over a year and for its own maintenance thereafter from the monies claimed from drivers that contravene the restriction. A locking barrier, by contrast, will tend to accrue maintenance costs across each year of service that must be met via public funds. Moreover, a camera that is temporarily out of service poses no unexpected delay to an emergency crew but retains the potential for deterrent in the mind of the driver seeking a short-cut. By contrast, a locked barrier that is found jammed shut when needed could send an emergency crew back around a long detour; while one that is jammed open is both a hazard and an invitation for misuse.
18. For those reasons, the department was keen to take the opportunity to improve the permeability of the network for ambulances and treat the sites LAS felt would offer greatest benefit, in the expectation of the measures paying for themselves over time. Revenue from parking and traffic operations can legally only be spent on limited areas, including measures such as this.
19. The local and regional population level continues to rise while levels of physical activity are lower than in previous generations to the detriment of public health, meaning demand on the ambulance service is higher now than in the past. The increased population tends to bring increased road congestion, but not more available lanes of road to allow ambulances to pass traffic.

Relevance to the Council's Plan

20. The Council's corporate plan directs the organisation to interventions that will "help improve public health and people's wellbeing". Shorter ambulance response times align with this aspiration.

Background

21. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 prescribe the procedure to be followed in making a traffic management order. Any written objections or representations received during the consultation period must be considered, conscientiously, before deciding whether to implement the change.
22. Representatives of LAS have communicated with the department and maintain their support for the proposals at all sites. LFB has not submitted comments. The department has provided Metropolitan Police Service with greater detail to make clear that a through route for general traffic is maintained at Firs Park Avenue and Montagu Gardens, this via the width restricted lanes. Also, to set out why it has proposed to exempt only emergency service vehicles in blue light situations, not for vehicles making routine patrols and such like.
23. In response to the **Firs Park Avenue** proposal nine responses were received from residents: one in favour, eight with objections or concerns. Appendix D provides the department's response to what were recurring questions within the submissions.
24. A key complaint was that the proposal did nothing to address perceived problems with excessive speed and volume of traffic on Firs Park Avenue. Appendix D explains that such issues are due to be addressed in due course (subject to funding) under other project work.
25. Residents felt the Council should have consulted more widely among households on the street; they also raised anxieties about the removal of the gate encouraging misuse by lorries or greater speeds by irresponsible drivers of other vehicles. Appendix D sets out the department's view that little difference to traffic movements will result from the change, thus justifying the condensed area of consultation. A subsequent review of PCN data from existing, comparable camera-controlled restrictions on Enfield's network indicates that PCNs are typically issued at a rate of 3 per day. This supports the department's prediction that no meaningful change in traffic levels would result.
26. No representations were received in response to the **Montagu Gardens** proposal.
27. In response to the **Ladysmith Road** consultation views against the proposal were expressed from almost every household in the street as well as from those in the connecting side road, Lambourne Gardens. In addition to the 198 individual submissions from residents, only one of which was in favour, many more households signed a petition or displayed posters of objection in their windows. There were high levels of dissatisfaction with the lack of prior community engagement and with the consultation letter being sent only to the 44 homes nearest the barrier. Ward councillors have written to underline the concerns of constituents, as has Feryal Clark MP. Appendix E provides the department's response to what were recurring questions within the submissions.

28. A key point of difference, as with Firs Park Avenue, is the predicted change the replacing of the barrier with a camera would make to the street in terms of traffic movements. In support of the proposal, and the degree of consultation the department felt appropriate, stands the figure of PCNs being issued at a rate of only 3 per day at comparable sites. Although effectively made two culs-de-sac by the historic placement of the barrier, 3 additional vehicles would still represent a tiny proportion of the daily traffic movements. The circa 350 homes thereon will likely generate over 1000 vehicle trips per day along certain sections of the street, when accounting for routine domestic trips out and back and activity associated with deliveries, visitors and so forth.
29. Nevertheless, the department recognises that anxieties on this aspect endure, with related concerns about road safety, speeding, house prices, air quality and criminality left unassuaged. Unlike the other two sites, where the passage of domestic through traffic has never previously been removed, at Ladysmith Road arises the sense of unease within the community that a more profound type of change is being set in motion.
30. Objectors query the degree of benefit that LAS or LFB will derive from the barrier being removed, given that the street offers less scope for unhindered progress by emergency vehicles than wider thoroughfares running parallel, such as Willow Road and the A10; notably when considering the passage of a vehicle as large as a fire engine. LAS officers state that their crews are well accustomed to negotiating such roads in the capital. The department agrees with LAS that it is a long street to offer access from one end only for any given home needing ambulance services or for anyone else happening to need medical attention while within the street. There is also the fact that the LAS fleet includes lone responder vehicles which, being cars, would not be unduly delayed by the constrained road layout.
31. While the department believes it has now supplied enough information to address initial concerns that the proposals were not founded on any genuine request from the emergency services, it recognises that there remains dissatisfaction within the community that the suggested benefits to response times have not been substantiated with the LAS supplying numerical analysis. Similarly, that LAS has not provided supplementary justification for the response time benefits it feels will apply to this particular site.

Main Considerations for the Council

32. The Council needs to consider the specific points covered above along with the more general consideration as to whether, in the case of very strong community opposition, the arguments in favour are robust enough that a decision to proceed can be judged as giving enough weight to community feeling.

Safeguarding Implications

33. None identified.

Public Health Implications

34. Measures to improve ambulance response times will tend to offer improvement to public health more generally. Changes that lead to road safety problems or suppress levels of walking or cycling due to greater traffic dominance would tend to be detrimental to public health. However, the department is confident that the latter would not apply should proposals at any of the three sites be taken forward.

Equalities Impact of the Proposal

35. An initial screening has been carried out and no impacts have been identified as a result of the proposed decision. A full equality impact assessment has therefore not been carried out in this instance.

Environmental and Climate Change Considerations

36. Changes that suppress levels of walking or cycling due to greater traffic dominance would tend to be detrimental to the environment. However, the department is confident that this would not apply should proposals at any of the three sites be taken forward. The proposals will not lead to a change in vehicle volumes but offer a small reduction in carbon emissions by reducing the distance needing to be travelled by emergency vehicles. For the new highway features proposed such as traffic islands, minimising the amount of materials used, and favouring recycled materials, will minimise the negative impacts from embedded carbon.

Risks that may arise if the proposed decision and related work is not taken

37. Deciding not to take forward proposals at each, or any, site risks missing the opportunity to improve ambulance response times in general. It also risks future incidents of delayed attendance by the emergency services at a fire or medical emergency in or around the streets in question that is later attributed to the presence of the barrier and its known hindrance factor on ambulance crews.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

38. Deciding to take forward proposals at each, or any, site risks reputational damage to the Council if changes to traffic movements prove more significant than anticipated. There is an accompanying financial risk in the event of any of the change subsequently needing to be undone, although this is minor given that the component of greatest cost – the camera – could easily be repurposed at a different location.

Financial Implications

39. The estimated implementation costs are as follows and, where taken forward, are to be met from the PPRA reserve, which can only be spent on prescribed transport schemes:
- Firs Park Avenue: £30,000
 - Montagu Gardens: £33,000
 - (Ladysmith Road: £30,000 – not being taken forward)

Legal Implications

40. Under Part V of the Highways Act 1980 the council has powers to make various improvements to the public highway. The proposals are in accordance with these duties and powers.
41. Section 122 of the Road Traffic Regulation Act (RTRA) 1984 places a duty on the Council to secure, as far as reasonably practicable, the 'expeditious, convenient and safe movement of vehicular and other traffic'. The proposed changes are in accordance with the discharge of this duty.

42. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 prescribe the procedure to be followed in making a traffic management order. Any written objections or representations received during the consultation period must be considered, conscientiously, before deciding whether to implement the change.
43. The recommendations contained within the report are in accordance with the Council's powers and duties as the Highway Authority.

Workforce Implications

44. None identified.

Property Implications

45. None identified.

Other Implications

46. None identified.

Options Considered

47. The suggestion was made, for the Ladysmith Road site, that the lockable barrier be replaced with an electronic system that raised the barrier automatically - or remotely from a control centre - when emergency access was needed. The community felt some form of physical barrier offered greater reassurance than the psychological deterrent of the camera. LAS stated having no objections to such a system if workable.
48. One submission from the community included an estimate of below £10,000 for such a product; as might be seen controlling access to a car park. However, even if this were deemed a robust enough model for placing in the public road, the costs attributed are not likely to account for preparatory work within the road construction – cabling and footings – nor for an electricity board connection. Concerns over the tendency for such products to fail under the action of vandals or poor drivers and then be costly to have repaired or replaced by specialist providers explain the Council not having installed any such mechanisms on its highway network hitherto.
49. More fundamentally, a physical barrier with electronic controls shares the same drawbacks as a conventional barrier. It will tend to accrue maintenance costs across each year of service that must be met via public funds, unlike a camera that will pay for itself from even small numbers of PCNs issued to contravening drivers. Moreover, a camera that is temporarily out of service poses no unexpected delay to an emergency crew but retains the potential for deterrent in the mind of the driver seeking a short-cut. By contrast, a barrier that is found jammed shut when needed could send an emergency crew back around a long detour; while one that is jammed open is both a hazard and an invitation for misuse.

Conclusions

50. It is recommended the Council proceed with the proposals at Firs Park Avenue to hasten access by fire and ambulance crews, notably the latter which face a lengthy detour when seeking access into the large estate due to the array of restriction points enclosing it. The case for Firs Park Avenue being the most strategic entry point of

the four in question for ambulance crews is clear. The Council can be confident that few drivers of domestic vehicles will breach the camera-controlled gap when they retain a legitimate facility to continue using the width-restricted lanes adjacent. Occasional abuse by drivers of commercial vehicles could be followed up, in each case, with targeted investigation into their operations in addition to the issue of the PCN.

51. It is recommended the Council proceed with the proposals at Montagu Gardens, which are unopposed and where presently no emergency access is possible to or from Montagu Road.
52. It is recommended the Council discontinue proposals for the Ladysmith Road site as there is an imbalance between the strength of community opposition relative to the degree of evidence offered hitherto to set out the benefits of this specific proposal. That could be revisited if further evidence, especially having a numerical basis, became available.

Report Author: Jonathan Goodson
Principal Engineer – Traffic Team
jonathan.goodson@enfield.gov.uk
0208 132 0988

Date of report: 5 October 2020

Appendices

- Appendix A: Residents Consultation Letter – Firs Park Avenue**
- Appendix B: Residents Consultation Letter – Montagu Gardens**
- Appendix C: Residents Consultation Letter – Ladysmith Road**
- Appendix D: Firs Park Avenue FAQs**
- Appendix E: Ladysmith Road FAQs**

Background Papers

None.

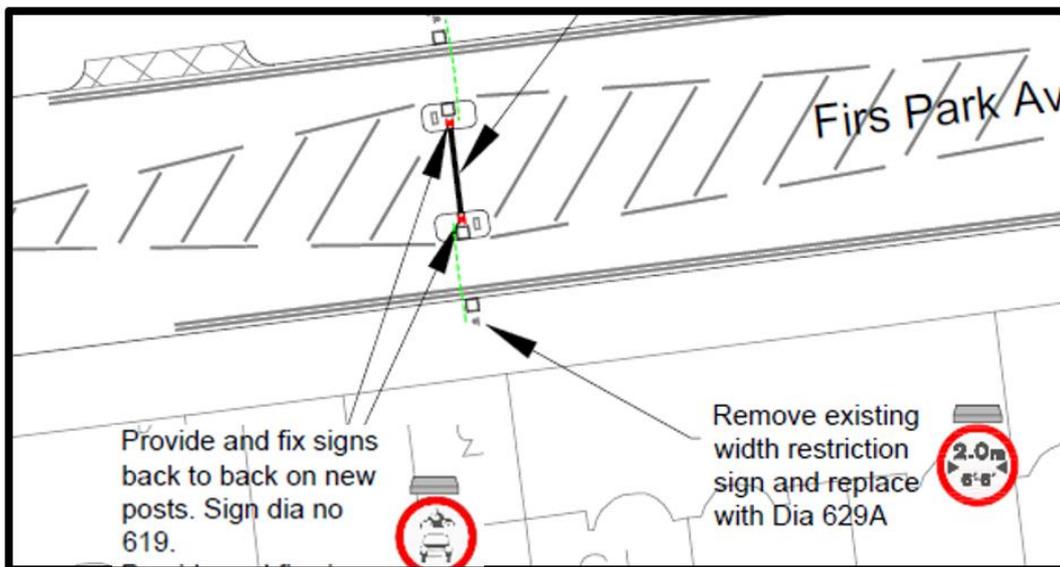
To Residents:
 homes near Firs Park
 Avenue access gate

Please reply to : Jonathan Goodson
 Tel : 020 8132 0988
 Date : 1 July 2020

Dear Sir/Madam

Emergency Vehicle Access Arrangements in Firs Park Avenue

Enfield Council plans to remove the emergency gate at the Firs Park Avenue width restriction and install a camera to enforce against misuse by drivers. This will help improve ambulance and fire engine response times but retain the ban on other larger vehicles. The gaps for general traffic will remain unchanged.



Comments may be sent to traffic@enfield.gov.uk or to the Civic Centre marked 'Traffic Team', by 22 July 2020. Please call 020 8132 0988 to ask questions.

Yours faithfully

Jonathan Goodson
 Traffic & Transportation

IMPORTANT – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to www.enfield.gov.uk/connected

Sarah Cary
 Executive Director Place
 Enfield Council
 Civic Centre, Silver Street
 Enfield EN1 3XY

www.enfield.gov.uk

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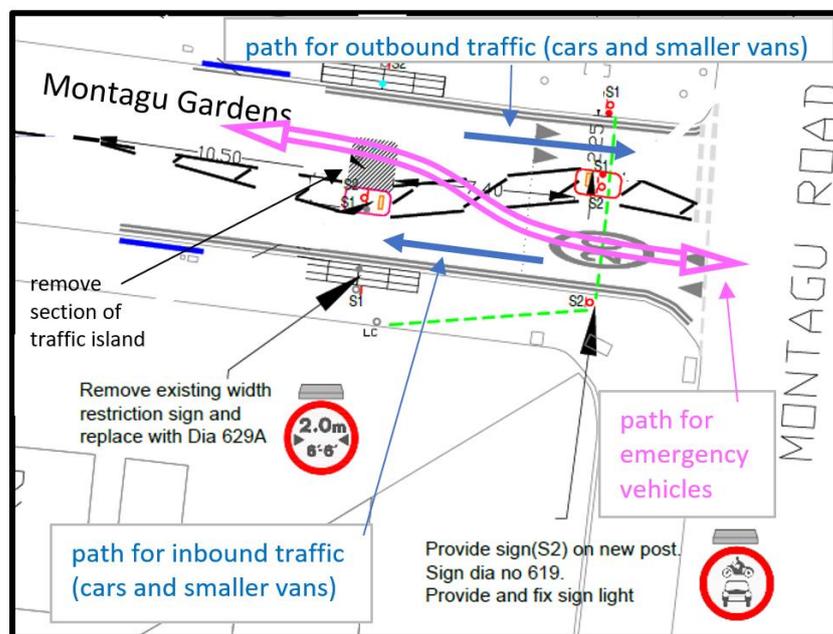
To Residents:
 homes near Montagu
 Gardens width restriction

Please reply to : Jonathan Goodson
 Tel : 020 8132 0988
 Date : 1 July 2020

Dear Sir/Madam

Ambulance Bypass to Montagu Gardens Width Restriction

Enfield Council plans to reconfigure the width restriction shown below such that emergency access is provided for ambulances and fire engines. A new camera will enable enforcement against misuse by other drivers. The size of the gaps provided for general traffic remains unchanged.



Comments may be sent to traffic@enfield.gov.uk or to the Civic Centre marked 'Traffic Team', by 22 July 2020. Please call 020 8132 0988 to ask questions.

Yours faithfully

Jonathan Goodson
 Traffic & Transportation

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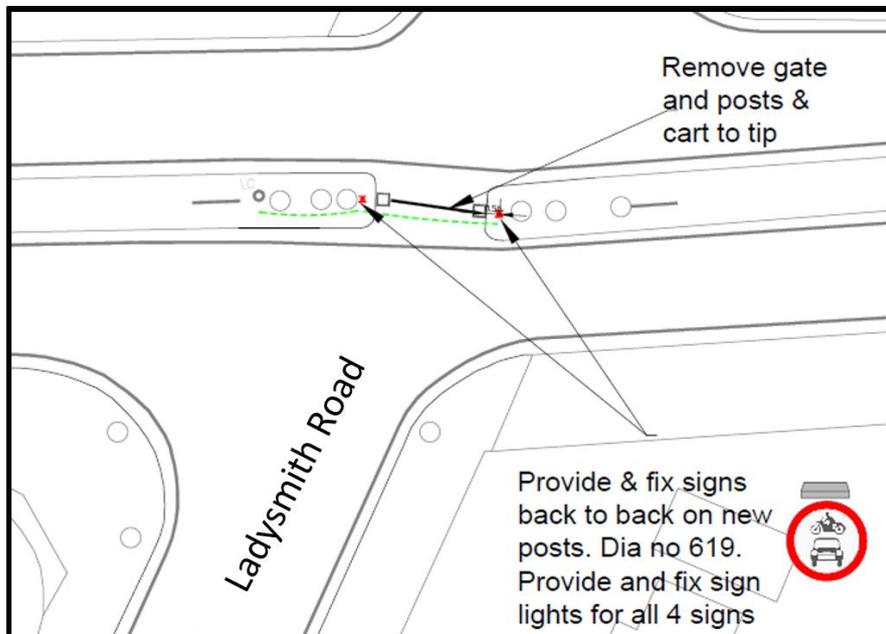
To Residents:
 homes near Ladysmith
 Road access gate

Please reply to : Jonathan Goodson
 Tel : 020 8132 0988
 Date : 1 July 2020

Dear Sir/Madam

Emergency Vehicle Access in Ladysmith Road

Enfield Council plans to remove the gate in Ladysmith Road and install a camera to enforce against misuse by drivers. This will help improve ambulance and fire engine response times in emergency events but retain the ban on other motor vehicles passing the closure point.



Comments may be sent to traffic@enfield.gov.uk or to the Civic Centre marked 'Traffic Team', by 22 July 2020. Please call 020 8132 0988 to ask questions.

Yours faithfully

Jonathan Goodson
 Traffic & Transportation

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Proposal to Replace Barrier on Firs Park Avenue Between Width Restrictions
with a Camera Controlled Gap for Emergency Access

Frequently Asked Questions

BACKGROUND

1) Who is making this proposal?

Enfield Council is making this proposal. The Council is the highway and traffic authority for the road in question. It is responsible for the maintenance of the current infrastructure and for the purchase and maintenance of any infrastructure that might be introduced to replace it.

2) How has this come about?

In Autumn 2019 officers from the traffic and transportation department met with representatives of London Ambulance Service (LAS) by way of early stage engagement on its programme of Quieter Neighbourhood projects. In response to the idea of future closure points across the network, LAS highlighted issues their crews face with negotiating locked barriers. LAS report that typically keys are not carried and that crews detour around such features. Their estimated delay factor is 60 seconds, relative to a target deadline of 7 minutes (less 90 seconds for operator/dispatch time) to reach the most critically ill or injured patients. Providing a gap with a permanent camera to deter misuse by other drivers was discussed as a suitable alternative. Subsequently, the proposal to upgrade three pre-existing sites was agreed, with our contact at LAS selecting the sites felt to offer greatest benefit to ambulance crews and patient outcomes. Firs Park Avenue was one of the three sites nominated.

CONSULTATION

3) Who has been consulted? Why was the whole street/area not consulted?

The department is clear on the best arrangement that removes the impediment of the lockable barrier for ambulance crews but retains a deterrent on misuse by drivers of non-emergency vehicles. It is also very confident that the proposal will result in a negligible change to traffic levels and speeds in Firs Park Avenue. Accordingly, the department did not seek input from the community in advance of making a proposal but moved directly to the statutory consultation exercise. Nor did it see necessity in notifying via letter-drop all the households within the estate. The regulations prescribe the placement of notices in the street, adverts in local papers and the London Gazette, and proposals being passed to the emergency services etc; all of which was done. Letters were sent to the 44 households nearest the barrier, who might otherwise have seen changes taking place at a later date and not known if they were planned work or something else. Notification was also sent to ward councillors to coincide with the letter drop. These measures to ensure a degree of local awareness were considered a good match to the minor scope of the change that is likely to result in terms of traffic movements.

FEARS ABOUT SPEED / VOLUME of TRAFFIC

4) Won't the proposal exacerbate the speeding problems?

Presently the existing width restrictions impose a pronounced slowing effect on domestic traffic and – along with a ring of similar control features on nearby streets - prevent drivers of large goods vehicles from departing the main roads in search of less appropriate back-routes through the estate. The department anticipates that the prospect of a penalty charge notice (PCN) will prove a strong deterrent on misuse of the gap by drivers of vehicles large or small, and hence that the proposal will

see no material increase in volume or speed of traffic, present no problems in terms of road safety, and make and no tangible change to the character of the street.

5) Shouldn't the focus, when funding is limited, be on traffic calming measures?

It was as part of the Quieter Neighbourhoods initiative (referenced above) that a perception survey was carried out across the area in late 2019. From this, the department has a good understanding of the community's views on how their streets function and how they could be made better. However, like most of the department's scheme work, the funding is largely derived from sustainable travel contributions from Transport for London. Were it not for the interruption in funding associated with the pandemic, it is likely that the perception study would by now have been followed by some firm plans for the Firs Lane Quieter Neighbourhood; and that these would have been focussed around reducing both the speed and volume of traffic.

The reason the present proposal is able to be taken forward during the period when other scheme work is on hold relates to how it is funded. Revenue from parking and traffic operations can legally only be spent on limited areas, including measures such as this. The further benefit of a camera over a barrier is that the barrier tends to be an ongoing maintenance burden given the need to make repairs etc. By contrast the camera has a small maintenance cost and over time the costs are likely to be offset by the monies claimed from the occasional bad driver breaching the restriction point. Hence unlike a traffic calming scheme – or Quieter Neighbourhood scheme – this proposal benefits from a specific source of applicable funding and will tend to recoup its costs over time. Hence, the department seeks to use this opportunity to provide benefits to ambulance response times whilst other work has necessarily been put on hold.

6) What studies have been undertaken?

The department has previous, recent traffic studies from across the area that will hopefully go on to inform its Quieter Neighbourhoods work, when this is able to resume. It has not undertaken studies on traffic, road safety, noise, pollution and so forth specifically relating to this proposal because it does not anticipate this proposal causing any material change to traffic patterns.

SIGNS, FINES, CAMERAS and LAWLESS DRIVERS

7) Which vehicles will be allowed through the restriction point? Will there be camera signs?

Any driver breaching the proposed No Motor Vehicles signs at the gap will be liable to receive a PCN. The only exemption is for emergency service vehicles during a blue-light event. Camera warning signs will be placed at the installation to reinforce to drivers the need to comply with the restriction.

8) Would the camera capture every offence? What is the penalty? What if fines go unpaid?

The camera would capture every offence in each direction, day or night. The system requires 'manual' review of the footage of interest before issuing a PCN but this work is already undertaken for various other sites and it is not anticipated that additional staff resources would be required arising from this proposal. Rather it is anticipated that the system will be largely self-enforcing with very few contraventions each day. The penalty is £130 for each offence, discounted to £65 if paid within 14 days. Unpaid fines would be pursued as a debt, possibly resulting in seizure of property.

9) Could a lawless driver routinely avoid PCNs by obscuring their registration plates?

Should the camera record such activity the footage would be passed to the police. Someone using this tactic routinely is likely to be locally based as well as a frequent user of the street and hence should not expect to go undetected for long.

BENEFITS TO AMBULANCE CREWS

10) Who is this supposed to help?

Switching the barrier for a camera could help fire crews in occasional circumstances in reaching a fire in the estate more quickly. It also avoids the problems of gates being left open, which persists at various sites across the network and has been confirmed in the responses received to this proposal.

Following discussions with the LAS, they advised that, if a number of these gates were removed it could save critical minutes when responding to emergency calls which, they say, could save lives. It is, therefore, anticipated that the main beneficiary would be ambulance crews and their patients; i.e. the residents of Enfield.

11) Can't ambulances already use the width restriction part of the road when gaining access?

Lone-responder vehicles (i.e. paramedic cars) would certainly have been able to do so, and some older style ambulances may also have fitted through the narrowed section of the road. However, the department understands that the latest fleet of ambulances includes a larger box section at the rear of the vehicle meaning its footprint now extends beyond that of the base vehicle (a transit-style van) of the like that residents may see passing through the width restriction. Depending on the exact tolerance applied to the original construction of the gaps, the larger ambulance is liable to be too wide to pass such features, or certainly too wide to pass without difficulty.

12) Why does the ambulance service need this kind of help? And why now? What has changed? Why can ambulance drivers not simply use keys to open barriers?

At a meeting last Autumn LAS officers were able to set out some of the problems their service faces, particularly with regard to lockable barriers. Further London-wide guidance from LAS has been issued to boroughs since, reinforcing their strong preference for councils to avoid placing locking barriers at key access points.

Normal practice by local authorities, historically, has been to provide a lockable barrier where there is need to delete through-traffic but retain emergency access, with the assumption that this serves all emergency services well enough. However, LAS points out that their vehicles do not carry the same surplus crew-members as fire crews and may be less able to improvise with physical measures such as cutting off a jammed padlock or lifting away a gate, if finding the infrastructure damaged. Their crews also make far more trips around the network than fire crews. LAS receives 5700 calls per day, which is 300 or 400 times more calls than London Fire Brigade.

The local and regional population level continues to rise while levels of physical activity are lower than in previous generations to the detriment of public health, meaning demand on the ambulance service is higher now than in the past. The increased population tends to bring increased road congestion, but not more available lanes of road to allow ambulances to pass traffic. Under modern levels of scrutiny, LAS is set challenging response targets to respond to emergency calls. Their target deadline to reach a patient who is critically ill or injured is 7 minutes less 90 seconds for operator/dispatch time. They typically find that encountering a barrier adds 60 seconds of delay, which is a significant amount of time relative to that deadline and when every passing second may increase the likelihood of death or of a permanent brain injury etc. to the patient. Replacing a barrier with a camera at key access points avoids an ambulance driver remaining on less direct routes for fear of not finding a barrier accessible or of facing delays while fumbling for keys.

The department's conclusion is that ambulance crews do face a different set of issues to fire crews; and that there is a clear benefit to the health outcomes of Enfield residents in trying to remove barriers at key sites to shorten response times.

Improvements in camera technology mean that they can now be mounted on existing lamp-posts, rather than on large bespoke masts, reducing costs. So there exists today an opportunity to allow easier access for ambulances whilst providing low-cost camera enforcement against misuse that did not exist in previous years.

13) Why change the Firs Park Avenue feature and not other nearby features, or all of them?

Residents will appreciate that the ring of features intended to deter misuse of the estate by large vehicles means similar control points to that on Firs Park Avenue are sited at Ridge Road, Rowantree Road and Halstead Road near their junctions with B154 Church Street. The view of LAS, as the department understands it, is that allowing unhindered access at just one of these four locations will resolve most concerns about gaining swift access to patients within the estate. The Firs Park Avenue junction is the first one encountered by ambulances departing the A10 or crossing the A10 on Church Street when despatched from Windmill Road ambulance station, and accordingly, this is their most strategic point of entry to the estate.

COSTS AND REVENUES

14) How much will the changes cost?

The cost of purchasing the camera is roughly £25k. Its installation on a lamp-post costs roughly £200. The remaining work in removing the gate and adding signs brings the full total to roughly £30k.

15) How can the installation be afforded?

Revenue from parking and traffic operations can legally only be spent on limited areas, including measures such as this. The further benefit of a camera over a barrier is that the barrier tends to be an ongoing maintenance burden given the need to make repairs etc. as set out above. By contrast the camera has a small maintenance cost attached and over time the costs are likely to be offset by the monies claimed from the occasional bad driver breaching the restriction point.

16) How much does the Council predict it will make in PCN revenue?

The Council did not make any such calculation in advance of making the proposal. It is merely seeking the opportunity to use the affordable technology now available to ease the passage of ambulances around the network.

NEXT STEPS

17) What happens next?

The Council will review the comments submitted and is likely to have made a decision by the end of September as to whether the proposal will go forward or otherwise.

18) How can I challenge the process?

Should it be decided to proceed with the scheme, anyone feeling that the Council has not followed the correct legal procedure could apply to seek a judicial review within six-weeks of the traffic order being made.

Proposal to Replace Barrier on Ladysmith Road
with a Camera Controlled Gap for Emergency Access

Frequently Asked Questions

BACKGROUND

1) Who is making this proposal?

Enfield Council is making this proposal. The Council is the highway and traffic authority for the road in question. It is responsible for the maintenance of the current infrastructure and for the purchase and maintenance of any infrastructure that might be introduced to replace it.

2) How has this come about?

In Autumn 2019 officers from the traffic and transportation department met with representatives of London Ambulance Service (LAS) by way of early stage engagement on its programme of Quieter Neighbourhood projects. LAS highlighted issues they face with negotiating locked barriers. LAS acknowledges that certain future schemes to tackle 'rat-running' will need to involve physical closure points. Their request was that access be retained at strategic points and that locked barriers be avoided at such sites. From subsequent discussions where LAS advised that locked barriers hindered access and responsiveness around the network a list of sites was identified by our main point of contact within LAS who has oversight on how their vehicles move around the network. Subsequently, the proposal to look at upgrading three pre-existing sites was agreed. These were thought to have the greatest impact on improving LAS responsiveness to emergencies across the borough, Ladysmith Road being one of the top priorities.

CONSULTATION

3) Who has been consulted? Why didn't every house get a letter?

The Council did not consult widely on the proposal as the replacement of the existing gate with an alternative restriction enforced by camera is viewed as an operational matter, unlikely to affect the local traffic levels. The change to the restriction requires the making of a traffic management order and the relevant regulations prescribe the placement of notices in the street, adverts in local papers and the London Gazette, and proposals being passed to the emergency services etc; all of which was done. In addition, although unlikely to be affected, letters were sent to the 43 households nearest the barrier, who might otherwise have seen changes taking place at a later date and not known if they were planned work or something else. This, along with the notification we sent to ward councillors, is likely to have boosted public awareness and it is apparent, as the period for comments closes, that the community has been actively engaged in the process in any event.

FEARS ABOUT ROAD SAFETY AND RAT-RUNNING

4) Won't the proposal lead to rat-running and poor road safety in Ladysmith Road?

The department is confident that the proposal will result in a negligible change to traffic levels and speeds in Ladysmith Road and that it will not affect the safety of people walking or cycling to access local facilities. Hence there is no good reason to associate the proposal with fears about road safety or rat-running; nor to undertake a particular risk assessment on the proposal; nor to undertake traffic counts ahead of the proposal being made.

Some respondents predict dramatic increases in through-traffic; others rather less, but enough to make the route unsuitable for emergency vehicles when also accounting for its limited width. The department believes that if the change were introduced it would be readily apparent from the opening days onwards that traffic levels had not materially increased in reality. If the scheme proceeds, monitoring will be carried out to measure its actual impact.

It is incorrect to think of the proposal as returning Ladysmith Road to the situation that existed the day before the barrier was originally introduced in the 1970s. Prior to its introduction, drivers – both the vast majority of responsible ones, and the few irresponsible ones – were in the habit of using Ladysmith Road as a through route; and knew they committed no offence by doing so. Today the habit of local drivers using Ladysmith Road as a through route does not exist. The presence of the restriction will prevent the habit re-establishing itself amongst responsible drivers; and the reality of receiving fines will quickly deter any of the irresponsible ones. To confirm, the camera would be in place permanently, from the start, and operate at all times.

Meanwhile, there is no reason to think that drivers unfamiliar with the area will be any more likely to turn into Ladysmith Road to seek a through route than they were before, as mapping and satnav devices will continue to show it as a no through route.

5) Wasn't there a good reason for the barrier being introduced in the first place?

The department understands that unconstrained use of Ladysmith Road as a through route for general traffic resulted in the barrier being introduced nearly fifty years ago to improve road safety and remove levels of traffic that were out of balance with the character and dimensions of the street. The department does not query the merits of its original placement. It is merely seeking to introduce a modern equivalent that improves ambulance access.

SIGNS, FINES, CAMERAS and LAWLESS DRIVERS

6) Which vehicles will be allowed through the restriction point? Will there be camera signs?

Emergency service vehicles will be allowed through. Delivery vehicles and domestic cars and vans, including those registered at homes in the street, will not be allowed past the signs and their owners would receive a Penalty Charge Notice (PCN) if passing through the restriction point, whether northbound or southbound. The camera enforcement sign will be mounted on each approach at the restriction point and accompanying the No Motor Vehicles signs. Placing advance warning signs of a camera-controlled restriction ahead – say, for drivers turning into Ladysmith Road – is not essential. Given that the status quo is that drivers do not turn into Ladysmith Road seeking a through route, there seems little reason to add such signs ahead of any such need becoming apparent. Existing no through road signs will remain. The facility for drivers needing to turn around at the restriction point is already suitable and will remain as found at present.

7) What about motorbikes and mopeds?

The department acknowledges reports of misuse of the existing gaps - intended for pedestrians and cycles - by those on mopeds. Curtailing unwanted access for mopeds is difficult without also hindering the passage of prams, mobility carriages and similar. The department does not claim a resolution to this issue by this proposal, as the gap for pedestrians is to remain open. However, moped riders opting to pass through the motor vehicle restriction point would be liable to receive a PCN, providing an additional deterrent.

8) Would the camera capture every offence? What is the penalty? What if fines go unpaid?

The camera would capture every offence in each direction, day or night. The system requires 'manual' review of the footage of interest before issuing a PCN but this work is already undertaken for various other sites and it is not anticipated that additional staff resources would be required

arising from this proposal. Rather it is anticipated that the system will be largely self-enforcing with very few contraventions each day. The penalty is £130 for each offence, discounted to £65 if paid within 14 days. Unpaid fines would be pursued as a debt, possibly resulting in seizure of property.

9) Could a lawless driver routinely avoid PCNs by obscuring their registration plates?

Should the camera record such activity the footage would be passed to the police. Someone using this tactic routinely is likely to be locally based as well as a frequent user of the street and hence should not expect to go undetected for long.

10) Fast-car enthusiasts are not always deterred by speed cameras on the A10; won't they start using Ladysmith Road if the barrier is removed?

The appeal of the A10 for this nuisance activity is likely to be in the scope for drivers to achieve high speeds, remain well-separated from pedestrians, and 'race' using two or more adjacent lanes; none of which applies to Ladysmith Road. Operation of the speed cameras and the monitoring of the A10 in general lies with Transport for London. There are several long, straight roads on Enfield's surrounding network that do not have barriers but none of these attract the sort of reports received about the A10. The department views the risk of such activity extending to Ladysmith Road as very low.

11) Won't the gap prove too great a temptation for parents on the school run?

A parent opting to misuse the gap to drive their child to school in the morning would be liable to a £130 PCN on the way there, and another on the way back home, repeated if using the same route to pick up the child in the afternoon. Even assuming half-price discounts for early payment, that equates to £260 of fines per day, or £1,300 per week. Successfully avoiding being identified will be particularly unlikely if it is obvious which school the trip applies to. Hence, the department believes infringements of this type will be exceptional, not routine.

12) Has this type of proposal worked well at other sites?

This would be the first site of this type on Enfield's network where a physical barrier was replaced with a camera. Permanent cameras are in use in other scenarios to monitor yellow boxes and bus lanes and the equipment is found to be robust and effective. Those sites do not offer an insight into how many transgressions are likely to occur at this site.

13) What if the level of misuse proves far higher than the department anticipates?

Were the proposal to go forward and any of the issues above found to be a problem the barrier could be replaced at relatively little cost. The major component of the installation costs is the purchase cost of the camera itself, which could easily be de-mounted and reused at another site.

BENEFITS TO AMBULANCE CREWS

14) Who is this supposed to help?

Switching the barrier for a camera could help fire crews in occasional circumstances in reaching a fire within the estate more quickly. Ambulances are smaller than fire trucks, of course, and paramedics' vehicles smaller still. Following discussions with the LAS, they advised that, if a number of these gates were removed it could save critical minutes when responding to emergency calls which, they say, could save lives. Therefore it is anticipated that the main beneficiary would be ambulance crews and their patients; i.e. the residents of Enfield.

15) How many emergency vehicles will use the street?

Our contact at LAS anticipates some use for access to the estate itself and some for a more direct access towards Southbury Road from the north, but in both cases only occasional levels of usage and only for emergency events. Vehicles would continue to be driven at speeds appropriate to the context and would continue to default to the wider main roads where these offer equally direct routes.

16) Why does the ambulance service need this kind of help? And why now? What has changed? Why can ambulance drivers not simply use keys to open barriers?

At a meeting last Autumn LAS officers were able to set out some of the problems their service faces, particularly with regard to lockable barriers. Further London-wide guidance from LAS has been issued to boroughs since, reinforcing their strong preference for councils to avoid placing locking barriers at key access points.

Normal practice by local authorities, historically, has been to provide a lockable barrier where there is need to delete through-traffic but retain emergency access, with the assumption that this serves all emergency services well enough. However, LAS points out that their vehicles do not carry the same surplus crew-members as fire crews and may be less able to improvise with physical measures such as cutting off a jammed padlock or lifting away a gate, if finding the infrastructure damaged. Their crews also make far more trips around the network than fire crews. LAS receives 5700 calls per day, which is 300 or 400 times more calls than London Fire Brigade.

The local and regional population level continues to rise while levels of physical activity are lower than in previous generations to the detriment of public health, meaning demand on the ambulance service is higher now than in the past. The increased population tends to bring increased road congestion, but not more available lanes of road to allow ambulances to pass traffic. Under modern levels of scrutiny, LAS is set challenging response targets to respond to emergency calls. Their target deadline to reach a patient who is critically ill or injured is 7 minutes less 90 seconds for operator/dispatch time. They typically find that encountering a barrier adds 60 seconds of delay, which is a significant amount of time relative to that deadline and when every passing second may increase the likelihood of death or of a permanent brain injury etc. to the patient. Replacing a barrier with a camera at key access points avoids an ambulance driver remaining on less direct routes for fear of not finding a barrier accessible or of facing delays while fumbling for keys.

The department's conclusion is that ambulance crews do face a different set of issues to fire crews; and that there is a clear benefit to the health outcomes of Enfield residents in trying to remove barriers at key sites to shorten response times.

Improvements in camera technology mean that they can now be mounted on existing lamp-posts, rather than on large bespoke masts, reducing costs. So there exists today an opportunity to allow easier access for ambulances - whilst providing low-cost camera enforcement against misuse - that did not exist in previous years.

17) Can the Council provide logs detailing all the times an ambulance has been delayed at the barrier in Ladysmith Road?

No, the Council holds no such information, nor for fire crews. We understand, under the new locking system and the previous one, that LAS crews have tended to take routes that avoid the feature.

18) Why is this needed when several people in the street have spoken to fire and ambulance crew workers who all say it would make little difference?

The department's information comes from the officer at LAS with specific oversight on how their vehicles get around the local network. The department does not believe there is any good reason to query the veracity of the advice provided. However, this point has been put to the officer at LAS who said that he does speak to colleagues on such matters but that no colleagues holding the view that the change will be pointless have come forward, as of 20 July, to share it with him.

19) Why is this needed when residents have seen emergency vehicle crews using the barrier quickly and easily?

The experience of negotiating the barrier on one occasion could be different to the next; say a sunny day compared to a wet, dark evening. Also, the significance of the number of additional seconds taken may vary from the viewpoint of a casual onlooker and that of someone awaiting treatment for a critical injury. A number of responses from those objecting to the proposal have provided anecdotal evidence that undermines this point of objection, indicating instead that negotiating the barrier can sometimes prove difficult.

One correspondent writes: "in once instance, it took an emergency vehicle several minutes to pass through the gate." Another writes: "emergency vehicles should have the correct training to know how to pass these with no problem, last year we had two fire trucks passing through with very bright lights and sirens, late at night having problems accessing the gate." Further, one caller recounted being told an ambulance was 1 minute away when it had been called for a loved one taken seriously ill near the junction of Southbury Road and Ladysmith Road, but that the ambulance ended up coming the long way around from Carterhatch Lane and taking 5 minutes to arrive. Hence observing the barrier to allow easy passage on one occasion does not translate to crews having confidence this will apply for all instances. The occasional bad experience could prompt drivers to take longer routes around thereafter and it is certain that none of those delays described above would have occurred had there been a camera instead of a barrier.

20) Why was the lock on the barrier changed recently?

A further problem with the original style lock was the ease with which the general public could obtain keys, allowing misuse of barriers and sometimes barriers being left to swing open, which poses a hazard to other road users. A programme to upgrade the locks at various sites across the borough with ones less vulnerable to tampering or misuse was started. Even if the present proposal was known at the time this wider exercise was being agreed upon, it was right to proceed with updating the locks given that the camera proposal has not yet reached the decision-making stage and a suitable locking system is needed in the intervening period.

21) If the current lock is problematic, why not replace it with an electronic system?

A key benefit of a camera mounted high on a lamp-post in comparison with a barrier at road level is that the position of the camera leaves it well protected from accidental damage or vandalism. By contrast, a barrier is vulnerable to tampering or to sustaining damage by deliberate attack or by accident. Barriers that need to move under electronic prompting have the same vulnerability with regard to the moving parts sustaining damage but are generally considered more prone to failure and more expensive to maintain. This is the main reason that the Council does not currently have any rising bollards or electronic gates on its public highway network. So if ambulance crews currently avoid a barrier due to being wary that it may be difficult to open, replacing with an electronic version could exacerbate, rather than remedy, the effect. There is a key difference between a camera and any form of physical barrier. When an ambulance crew finds a barrier faulty or damaged they would need to turn around and seek a different route. Should a camera fail, the ambulance still has clear passage, but in most cases prospective abusers will remain cautious of breaching the restriction point, not knowing if the camera is operating or not.

22) Why is this needed if a right turn for buses from Carterhatch Lane into Willow Road is introduced?

A right turn for buses from Carterhatch Lane into Willow Road would allow Enfield-bound buses approaching from Clay Hill to follow the extended route (to be renumbered route 456) south towards the town. Ambulances on Carterhatch Lane can, along with other traffic, already turn left into Willow Road if approaching from the east. They can use Baker Street to head south if starting further west. Or even improvise a turn southbound if seeking to use Willow Road. A key benefit to removing the barrier is to allow an uninterrupted route for ambulances from the ambulance station on Carterhatch Lane and surrounding starting positions south into the estate and onto Southbury Road without

needing to take a longer route via either the A10 or Willow Road. Hence the proposal for the bus turn makes little difference and does not replace the benefits for ambulances of the proposal at Ladysmith Road.

23) Ladysmith Road is quite narrow and heavily parked and sometimes congested; its intersection with Southbury Road is quite narrow. Delivery vehicles and bin lorries sometimes further reduce passing space and it has few side roads. Alternative routes using the A10 or Willow Road are wider. Why would ambulance drivers want to use it?

The physical characteristics of Ladysmith Road are acknowledged, but emergency calls can occur at periods when it is not congested and the presence of crossovers does, at other times, retain natural passing space for vehicles. And the speed of progress along a narrow street in an ambulance displaying blue lights is likely to be quicker than in a domestic vehicle, where one must expect to yield priority at intervals. The department believes ambulance drivers are best given a free choice of what route they choose based on the circumstances of the trip.

This point has also been put to the officer at LAS. He confirms that he is familiar with Ladysmith Road and had factored its limitations into his request. He adds that the experience of driving ambulances down such roads is very common to anyone driving ambulances in London and use of such a street is not exceptional. While the A10 is wider, congestion on its approaches remains a factor across extended parts of the day and turning on and off the road, even with blue lights and sirens, does require ambulance drivers to exercise a degree of caution and patience.

COSTS AND REVENUES

24) How much will the changes cost?

The cost of purchasing the camera is roughly £25k. Its installation on a lamp-post costs roughly £200. The remaining work in removing the gate and adding signs brings the full total to roughly £30k.

25) How can the installation be afforded?

Revenue from parking and traffic operations can legally only be spent on limited areas, including measures such as this. The further benefit of a camera over a barrier is that the barrier tends to be an ongoing maintenance burden given the need to make repairs etc. as set out above. By contrast the camera has a small maintenance cost attached and over time the costs are likely to be offset by the monies claimed from the occasional bad driver breaching the restriction point.

26) How much does the Council predict it will make in PCN revenue?

The Council did not make any such calculation in advance of making the proposal. It is merely seeking the opportunity to use the affordable technology now available to ease the passage of ambulances around the network.

NEXT STEPS

27) What happens next?

The Council will review the comments submitted and is likely to have made a decision by the end of August as to whether the proposal will go forward or otherwise.

28) How can I challenge the process?

Should it be decided to proceed with the scheme, anyone feeling that the Council has not followed the correct legal procedure could apply to seek a judicial review within six weeks of the traffic order being made.

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