

# Public Document Pack



## OVERVIEW & SCRUTINY COMMITTEE

Thursday, 8 September 2016 at 7.30 pm  
Conference Room, Civic Centre, Silver  
Street, Enfield EN1 3XA

Contact: Stacey Gilmour  
Scrutiny Officer  
Direct: 020-8379-4187  
Tel: 020-8379-1000  
Ext: 4187  
E-mail: [Stacey.gilmour@enfield.gov.uk](mailto:Stacey.gilmour@enfield.gov.uk)  
Council website: [www.enfield.gov.uk](http://www.enfield.gov.uk)

Councillors : Derek Levy (Chair), Abdul Abdullahi, Katherine Chibah, Joanne Laban,  
Edward Smith and Nneka Keazor

Education Statutory Co-optees: 1 vacancy (Church of England diocese representative), Simon Goulden (other faiths/denominations representative), Tony Murphy (Catholic diocese representative), Alicia Meniru & 1 vacancy (Parent Governor Representative).

Enfield Youth Parliament Co-optees (2)

Support Officer – Andy Ellis (Lead Scrutiny Officer)  
Stacey Gilmour (Scrutiny Officer)

## AGENDA

1. **WELCOME & APOLOGIES**
2. **DECLARATIONS OF INTEREST**

Members of the Council are invited to identify any disclosable pecuniary, other pecuniary or non-pecuniary interests relevant to items on the agenda.

3. **CALL-IN OF REPORT: APPROVAL OF CYCLE ENFIELD PROPOSALS FOR THE A105** (Pages 1 - 96)

To receive a report from the Director of Finance, Resources & Customer Services outlining a Call-In received for consideration by Overview & Scrutiny on the following reason: (Report No: 78).

**Portfolio decision by Cabinet Member for Environment (18 August 2016): Approval of Cycle Enfield Proposals for the A105.**

Decision included on Publication of Decision List No: 20/16-17 Key Decision 4342 (List Ref: 4/20/16-17) issued on 18 August 2016.

It is proposed that consideration of the Call-In be structured as follows:

- Brief outline of reasons for the Call-In by representative(s) of the Members who have called in the decision.
- Response to the reasons provided for the Call-In by the Cabinet Member responsible for taking the decision.
- Debate by Overview & Scrutiny Committee and agreement on action to be taken.

#### **4. CHILDREN'S & YOUNG PEOPLE'S ISSUES** (Pages 97 - 132)

To receive reports on the following:

##### 4.1 Children in Need, Child Protection & Looked After Children in Enfield 2015/16

To receive a report from Julian Edwards, Interim Assistant Director, Children's Social Care

##### 4.2 Local Authority Designated Officer (LADO) Annual Report 2015/16 & Safeguarding & Quality Assurance Service Independent Review Officer (IRO) Annual report 2015/16

To receive reports from Ann Stoker, Head of Safeguarding, Quality & Principal Social Worker, Schools & Children's Services

#### **5. MINUTES OF THE MEETINGS HELD ON 30 JUNE & 14 JULY 2016** (Pages 133 - 148)

To agree the Minutes of the meetings held on 30 June and 14 July 2016.

#### **6. AGENDA PLANNING**

Agenda Planning discussions for future meetings.

#### **7. DATES OF FUTURE MEETINGS**

To note the dates of future meetings as follows:

##### Call-In

Thursday 15 September 2016

##### Provisional Call-Ins

Thursday 29 September 2016

Wednesday 26 October 2016

Please note, the next business meetings of the Overview & Scrutiny

Committee will be held on

Tuesday 11 October 2016

Thursday 10 November 2016

**8. EXCLUSION OF THE PRESS & PUBLIC**

To consider, if necessary, passing a resolution under Section 100A(4) of the Local Government Act 1972 excluding the press and public from the meeting for the item of business listed in Part 2 of the agenda on the grounds that it will involve the likely disclosure of exempt information as defined in those paragraphs of Part 1 Schedule 12A to the Act (as amended by the Local Government (Access to Information) (Variation) Order 2006), as are listed on the agenda (Please note there is a Part 2 agenda).

This page is intentionally left blank

**MUNICIPAL YEAR 2016/2017 REPORT NO. 78****MEETING TITLE AND DATE:**

**Overview & Scrutiny  
Committee, 8 September  
2016**

**REPORT OF:**

Director of Finance, Resources  
and Customer Services

Contact officers and telephone  
numbers:

Asmat Hussain, Assistant Director Legal and Governance

Tel: 020 8379 6438

Email: [asmat.hussain@enfield.gov.uk](mailto:asmat.hussain@enfield.gov.uk)

Claire Johnson, Scrutiny and Member Services Manager

Tel: 020 8379 4239

E mail: [claire.johnson@enfield.gov.uk](mailto:claire.johnson@enfield.gov.uk)

<b>Agenda – Part: 1</b>	<b>Item: 3</b>
<b>Subject:</b> Approval of Cycle Enfield Proposals for the A105	
<b>Wards:</b> Bush Hill Park, Grange, Palmers Green, Winchmore Hill	
<b>Key Decision No:</b> 4342	
<b>Cabinet Member consulted:</b> N/A	

**1. EXECUTIVE SUMMARY**

1.1 This report details a call-in submitted in relation to the following decision:

**Portfolio decision by Cabinet Member for Environment (18 August 2016)  
Approval of Cycle Enfield Proposals for the A105.**

1.2 Details of this decision were included on Publication of Decision List No. 20/16-17 (Ref. 4/20/16-17 – issued on 18 August 2016).

1.3 In accordance with the Council's Constitution, Overview and Scrutiny Committee is asked to consider the decision that has been called-in for review.

1.4 The members who have called-in this decision do not believe it falls outside of the Council's Policy Framework.

**2. RECOMMENDATIONS**

2.1 That Overview and Scrutiny Committee considers the called-in decision and

either:

- (a) Refers the decision back to the Cabinet Member for reconsideration setting out in writing the nature of its concerns. The Cabinet Member then has 14 working days in which to reconsider the decision; or
- (b) Refer the matter to full Council; or
- (c) Confirm the original decision.

Once the Committee has considered the called-in decision and makes one of the recommendations listed at (a), (b) or (c) above, the call-in process is completed. A decision cannot be called in more than once.

If a decision is referred back to the decision making person or body; the implementation of that decision shall be suspended until such time as the decision making person or body reconsiders and either amends or confirms the decision, but the outcome on the decision should be reached within 14 working days of the reference back. The Committee will subsequently be informed of the outcome of any such decision.

### **3. BACKGROUND/INTRODUCTION**

- 3.1 Please refer to Sections 3, 4 and 5 of the Portfolio decision report.

### **4. ALTERNATIVE OPTIONS CONSIDERED**

None – Under the terms of the call-in procedure within the Council's Constitution, Overview & Scrutiny Committee is required to consider any eligible decision called-in for review. The alternative options available to Overview & Scrutiny Committee under the Council's Constitution, when considering any call-in, have been detailed in section 2 above.

### **5. REASONS FOR RECOMMENDATIONS**

To comply with the call-in procedure within the Council's Constitution.

### **6. COMMENTS OF THE DIRECTOR OF FINANCE, RESOURCES AND CUSTOMER SERVICES AND OTHER DEPARTMENTS**

#### **6.1 Financial Implications**

The financial implications relating to the called-in decision have been detailed in the Portfolio decision report.

## **6.2 Legal Implications**

S 21, S 21A-21C Local Government Act 2000, s.19 Police and Justice Act 2006 and regulations made under s.21E Local Government Act 2000 define the functions of the Overview and Scrutiny committee. The functions of the committee include the ability to consider, under the call-in process, decisions of Cabinet, Cabinet Sub-Committees, individual Cabinet Members or of officers under delegated authority.

Part 4, Section 18 of the Council's Constitution sets out the procedure for call-in. Overview and Scrutiny Committee, having considered the decision may: refer it back to the decision making person or body for reconsideration; refer to full Council or confirm the original decision.

The Constitution also sets out at section 18.2, decisions that are exceptions to the call-in process.

## **6.3 Property Implications**

There are no corporate property implications arising from the Portfolio decision Report.

## **7. KEY RISKS**

The key risks identified relating to the called-in decision have been detailed in the Portfolio decision Report.

## **8. IMPACT ON COUNCIL PRIORITIES**

The way in which the called-in decision impacts on the Council priorities relating to fairness for all, growth and sustainability and strong communities have been detailed in the Portfolio decision Report.

## **9. EQUALITIES IMPACT IMPLICATIONS**

The equalities impact implications relating to the called-in decision have been detailed in the Portfolio decision Report.

## **10. PERFORMANCE MANAGEMENT IMPLICATIONS**

The performance management implications identified relating to the called-in decision have been detailed in the Portfolio decision Report.

## **11. HEALTH AND SAFETY IMPLICATIONS**

The health and safety implications identified relating to the called-in decision have been detailed in the Portfolio decision Report.

**12. PUBLIC HEALTH IMPLICATIONS**

The public health implications identified relating to the called-in decision have been detailed in the Portfolio decision Report.

**Background Papers**

None



# **APPENDIX 1**

**Call-In: Portfolio Decision: Approval of Cycle  
Enfield Proposals for the A105**

This page is intentionally left blank

**MUNICIPAL YEAR 2016/2017 REPORT NO.****ACTION TO BE TAKEN UNDER DELEGATED AUTHORITY**

**PORTFOLIO DECISION OF:**  
Cabinet Member for Environment

**REPORT OF:**  
Director – Regeneration & Environment

<b>Agenda – Part: 1</b>	<b>KD Num: 4342</b>
<b>Subject:</b>	
<b>Approval of Cycle Enfield Proposals for the A105</b>	
<b>Wards: Grange, Bush Hill Park, Winchmore Hill and Palmers Green</b>	

Contact officer and telephone number: Paul Rogers, 020 8379 3304

E mail: [paul.rogers@enfield.gov.uk](mailto:paul.rogers@enfield.gov.uk)

**1. EXECUTIVE SUMMARY**

This report sets out the results of the A105 statutory consultation and seeks approval to make traffic management orders and approval of the final scheme design for implementation.

These proposals are part of the Mayor's Cycle Vision for London and will be fully funded by Transport for London (TfL). The proposals contained in this report are expected to deliver economic, health and transport benefits for local residents, businesses and visitors to Enfield.

**2. RECOMMENDATIONS**

2.1 To approve the final design of the proposals for the A105 shown on the plans in Appendix A and to take all necessary steps to implement the scheme including:

- a) Making the traffic management orders specified in Schedule 1 of Appendix C as advertised and without modification
- b) Making the traffic management order specified in Schedule 2 of Appendix C with modification to remove the time restriction on bays in residential areas.
- c) Implementing the raised entry treatments, flat top speed tables and raised junctions specified in Schedule 3 of Appendix C

- d) Implementing the Zebra crossings and associated zig-zag markings specified in Schedule 4 of Appendix C
- e) Implementing the 'Tiger crossings' and associated zig-zag markings specified in Schedule 5 of Appendix C
- f) Introducing designated disabled persons parking places at least in the general locations specified Schedule 6 of Appendix C and all waiting and loading restrictions using the experimental powers provided by S9 of the Road Traffic Regulation Act 1984.

### **3. BACKGROUND**

- 3.1 On 10 February 2016, Cabinet granted approval to undertake detailed design and statutory consultation for lightly segregated cycling facilities and public realm improvements along the A105 between Enfield Town and Palmers Green. Cabinet also delegated authority to the Cabinet Member for Environment to approve and implement the final design of the scheme subject to consultation and completion of all necessary statutory procedures.
- 3.2 On 25 May 2016, a co-design workshop was held at the Dugdale Centre to enable local residents who represent the interests of the area to put forward ideas for public realm improvements at Compton Road and the Palmers Green Triangle. This workshop was facilitated by Living Streets, the charity for everyday walking. Most of the ideas put forward by participants have been further developed by the Council's designers and landscape architects and are included in the final scheme design.
- 3.3 On 20 July 2016, officers met with representatives from the Centre for Accessible Environments (CAE) to run through the designs to make sure that they take account of the needs of older people and people with disabilities. The initial meeting focussed on bus stop boarders, pedestrian crossings, segregation and materials. Whilst CAE conclude that the overall scheme will offer significant benefits to all users, they continue to have concerns about some aspects of the design. Officers will continue to work with CAE and others to mitigate these concerns as much as possible given the overall scheme objectives.
- 3.4 On 15 June 2016, Cabinet approved the Cycle Enfield spending plans for 2016/17, including £3.1m for the A105 scheme.
- 3.5 Cycle Enfield represents a significant investment in the borough that can help improve our high streets and town centres; deliver long-term health benefits; and enable people to walk and cycle in safety. The overall Cycle Enfield programme includes not just cycle lanes on several of the borough's main roads, but also an extensive network of Greenway routes, cycle hubs and a wide range of supporting measures to encourage more people to cycle.

### **4. THE PROPOSAL**

- 4.1 The proposal involves the introduction of lightly segregated cycle lanes on both sides of the A105 between Enfield Town and Palmers Green and public realm improvements. Further details are shown on the drawings in Appendix A.
- 4.2 The main works will be delivered by Ringway Jacobs via the London Highways Alliance Contract.

## **5.0 STATUTORY CONSULTATION**

- 5.1 In addition to the statutory notification required prior to implementation of pedestrian crossings, speed tables and entry treatments etc. Traffic Management Orders (TMOs) are required to implement several elements of the scheme, including:
- Cycle lanes with exemptions to allow picking up and setting down by blue badge holders and maintenance vehicles
  - Various parking places
  - Goods vehicle loading bays
  - Alterations to bus lanes and taxi ranks
  - Closure of existing slip roads and service roads
- 5.2 The procedure for making TMOs is set out in the Local Authorities' Traffic Order (Procedure) (England and Wales) Regulations 1996. As a minimum, the regulations require the council to publish notice of its intentions in the London Gazette and a local newspaper, as well as notify the following bodies:
- The Freight Transport Association
  - The Road Haulage Association
  - Metropolitan Police
  - London Ambulance Service
  - London Fire Brigade
  - TfL (Buses) & relevant bus operators
- 5.3 A copy of the statutory notice is provided in Appendix D.
- 5.4 The council also has discretion to consult other organisations it thinks appropriate and routinely consults the following additional groups:
- Enfield Disability Action
  - Federation of Enfield Residents' & Allied Associations
  - London Travel Watch
- 5.5 In addition, the Council must take appropriate steps to inform those likely to be affected by the orders. This requirement was met by:
- Erecting site notices along the corridor

- Promoting the consultation for three consecutive weeks in local newspapers
  - Publishing information on the Cycle Enfield website.
  - Distributing 17,000 consultation leaflets to properties within 400m either side of the A105 corridor.
- 5.6 The A105 statutory consultation leaflet was a non-technical document that sets out what has happened so far; lists the key aspects of the scheme and changes made as a result of the July 2015 consultation; includes a plan and visualisations of the route; includes answers to frequently asked questions; informs the reader how to access further information e.g. the air quality assessment, the economic impact assessment and the traffic modelling report and how to object to any aspect of the draft traffic management orders. A facility was provided on the Cycle Enfield website to make it easy for objections and representations to be made.
- 5.7 The statutory consultation period commenced on 6 July 2016 and continued until 29 July 2016.
- 5.8 The Council received approximately 1,600 objections, most of which were made on-line. Details of the responses are provided in Appendix B but some of the key comments made by the statutory and other respondents are summarised in the paragraphs below.

#### **Comments from Statutory Consultees**

- 5.9 Responses to the statutory consultation were received from the Metropolitan Police, London Fire Brigade, London Ambulance Service and Arriva London.

#### **Metropolitan Police**

- 5.10 The Metropolitan Police Traffic Management Unit have been involved with the development of the scheme from the outset and provided comments that have helped shape the design. A further meeting with the Police took place on 22 July 2016 to outline the latest design proposals and no objections have been received.
- 5.11 Previous comments from the Police in response to the earlier consultation process stated:

*“Overall, the Metropolitan Police supports these proposals, which should improve safety for cyclists using these routes. It is possible that, in some reasonably foreseeable circumstances, the reduction in capacity for general traffic will result in increased response times for police when responding to emergency calls. However, this is impossible to measure, and we fully anticipate that once all works have been completed and scoot is fully operational, that any such delays will be minimal.*”

*However, there may be circumstances in which police vehicles may have to be driven on the cycle lanes or segregated cycle tracks, and it is therefore essential that the relevant TRO's include the appropriate exemptions for emergency services”.*

- 5.12 The traffic management orders relating to the introduction on the cycle lanes do include provision for emergency service vehicles to enter the lanes as and when required.

#### **London Fire Brigade**

- 5.13 The email response from the London Fire Brigade Borough Commander states:

*“London Fire Brigade (LFB) have no objections to the A105 proposals as presented. This response is the official response of the LFB, no further consultation with other LFB persons is required. Thank you for ensuring LFB were consulted on this project”.*

#### **London Ambulance Service**

- 5.14 The London Ambulance Service has not objected to the proposals but states:

*“I think generally I stick to previous comments made around traffic flow and calming measures. In essence the LAS needs 24/7 access to routes unhindered. Any changes to roads that increase congestion or slow down traffic and our access would be disappointing. I'm aware some parts of London have reduced the width of roads to allow the CSHW, this has caused concern for the LAS in some areas”.*

- 5.15 The previous comments referred to were:

*“Concerns around the width of the road and access past vehicles at bus stops. Parked vehicles and potential issues around flow if a vehicle should break down or there is an accident blocking the road. My concern is I need the LAS fleet to be able to have unhindered access so progress can be made while engaged on 999 calls. Needless to say I also need the LAS fleet to be able to remain mobile and not be gridlocked at peak times of the day. Therefore, the road network needs to be able to deal with everyday events and traffic while still keeping the road network moving. I'm not suggesting this system will not allow this but I note the width of the roads seems to be less with more potential bottlenecks around parking bays and bus stops”.*

- 5.16 The use of traffic separators to segregate cyclists from other traffic will help to minimise the impact on emergency service response times, allowing broken down vehicles etc. to pull into the cycle lane if necessary. This

distinguishes the scheme from many parts of the Cycle Superhighway, where the cycle lane is physically separated from the carriageway. In addition, the detailed traffic modelling demonstrates that the scheme will not cause gridlock, or indeed have a significant impact on journey times at most times. The impact of the scheme on journey times at peak times is summarised in paragraph 5.34 below.

### **Arriva London**

- 5.17 Objections have been received from Arriva London, who operate the 121, 329 and W6 bus routes along or on parts of the A105:

*"It is impossible to assess, from the information given, the impact on bus services of the various revocations and introduction of parking places and the introduction of prescribed routes;*

*Parts of the A105 are wide, but parts are sufficiently narrow that reduction in carriageway width will delay buses;*

*We have major concerns over the introduction of speed tables or any other vertical deflection. These have a disproportionate impact on buses and their passengers, even before the constant impact of heavy vehicles coming off the deflection affects the road surface on the exit side;*

*We rely on bus lanes to help give some predictability to journey times, and we object to the proposed removal;*

*I seek clear and specific assurance that the bus stands on, or adjacent to, Green Lanes at Green Dragon Lane, Fords Grove and Hedge Lane are protected for continued use by buses".*

- 5.18 A meeting was held with Arriva London following receipt of their objection to clarify the proposals and to discuss their concerns. 3.25m clear lane widths are provided in both directions along the corridor and the carriageway narrowing will not in itself delay buses. However, it is acknowledged that some additional junction delay along the corridor will impact on bus journey times, expected in the worst case to be in the region of 1 minute for buses heading south in the PM peak hour. This has been the subject of extensive discussion with TfL and a commitment has been made to identify measures elsewhere on the route (mainly in Haringey) to mitigate this impact.
- 5.19 A number of speed tables are proposed along the corridor to reduce speeds in critical locations, such as crossing points and junctions with connecting Greenway routes. These will all be designed to standards prepared by TfL and previously agreed with the bus operators, which incorporate gentler gradients to reduce the impact on bus drivers and passengers.
- 5.20 A section of southbound bus lanes between Oakthorpe Road and Ecclesbourne Gardens is removed as part of the scheme as the carriageway



is too constrained where it passes over the New River to accommodate both a bus lane and cycle lanes on both sides of the road. Queue length surveys demonstrate that average peak hour maximum queues do not extend beyond the length of the retained bus lane so the loss of the bus lane is not anticipated to have a significant impact on bus journey times.

- 5.21 The existing bus stands by Fords Grove and Hedge Lane are both retained as part of the proposals. The infrequently used stand north of Green Dragon Lane is relocated to Firs Lane, accessed via Percy Road.

### **Comments from Other Respondents**

- 5.22 The campaign group Save Our Green Lanes (SOGL) is understood to have distributed c.15,000 leaflets, suggesting possible grounds that people could use for objecting to the A105 draft traffic management orders.
- 5.23 Overall there was a strong response to the consultation, with over 1,600 comments and objections received and a wide range of issues covered, including objections relating to air quality; economic impact; traffic congestion; road safety; the impact on blue badge holders; the loss of uncontrolled parking; value for money; and the design of bus stops. As well as being addressed in Appendix B, each of these issues is considered in the paragraphs below:

### **Air Quality**

- 5.24 An independent study was commissioned to assess the impact of the scheme for the A105 on air quality. The assessment was carried out by Cambridge Environmental Research Consultants (CERC) and the result reported to Cabinet in February 2016.
- 5.25 The full report was published on the Cycle Enfield website and the leaflet sent to residents as part of the statutory consultation directed people to the report for further information regarding air quality.
- 5.26 Several people objected to the proposals on the basis that they felt that the 2.5% reduction in traffic levels on the corridor would not be achieved and, even if it was, there would be a worsening in air quality at junctions and other locations along the route due to additional delays at junctions and traffic being held behind buses or right turning vehicles.
- 5.27 The air quality report acknowledges that there is likely to be some increase in NO<sub>2</sub> concentrations at junctions where there are some increases in queue length and delay time. However, the report states that the areas of these increases will be much smaller than the area of air quality improvements along the rest of the route, with reduced traffic flows at 2.5%. These improvements are small (between 0.25 µg/m<sup>3</sup> and 0.5 µg/m<sup>3</sup>) but have the potential to increase if a greater mode shift from private car to cycling is achieved in the future.

- 5.28 Increasing cycling infrastructure and encouraging more people to cycle is a key element of the Council's Air Quality Action Plan, which is produced in recognition of the legal requirement on the Council to work towards air quality objectives within the Borough; this is as required under Part IV of the Environment Act 1995 and the relevant air quality regulations.
- 5.29 Enfield currently has a very low proportion of trips made by cycle compared to some other outer London boroughs and a mode shift of 2.5% is not unrealistic given the level of infrastructure improvement proposed. However, as this shift from cars to cycle is not guaranteed it is possible that the resulting air quality improvements will not be achieved.

### **Economic Impact**

- 5.30 An independent town centre study was commissioned to assess the impact of the scheme on town centre vitality. The assessment was carried out by Regeneris and the findings reported to Cabinet in February 2016.
- 5.31 The full report was published on the Cycle Enfield website and the leaflet sent to residents as part of the statutory consultation directed people to the report for further information on the impact of the proposals on Palmers Green, Winchmore Hill Broadway and Winchmore Hill Green Dragon town centres.
- 5.32 The core ground of the objection relating to economic impact is focused on the impact on car parking in the high street areas.
- 5.33 Following previous engagement and consultation events, the majority of high street car parking is retained in the designs, as much as 91% in some areas of Palmers Green, with 70% retention in the areas with the greatest reductions. Additional measures will be taken to increase shopper parking capacity by re-designing Council car parks and introducing zones of free parking for 45 minutes. The majority of people (approximately 75%) arrive to our town centres by walking or bus, but car parking remains an important component of developing successful town centres so rightly forms a central part in the design of the scheme. The proposals have been subject to an independent economic assessment, which took an analytical approach and identified a range of potential impacts that could result from the scheme. The report concluded that, although there may be some minor negative impact during construction, once the scheme was in place it was likely to have a negligible impact on town centre viability. A number of risk mitigation measures were proposed which the Council will implement, reducing further any risk that the scheme will adversely affect town centre vitality.

### **Congestion**

- 5.34 Further work has been carried out since Cabinet in February to refine the scheme design and the latest assessment of additional delay per mile are summarised in the table below, with the equivalent figures presented to Cabinet shown in brackets.

Additional delay per mile	Northbound (seconds)	Southbound (seconds)
AM Peak	35 (33)	16 (24)
PM Peak	35 (25)	34 (47)

- 5.35 Again, the traffic modelling report was published on the Cycle Enfield website and the leaflet sent to residents as part of the statutory consultation directed people to the report for further information. This assessment took account of the additional delays at junctions as well as delays at bus stops and due to removal of right turning pockets.
- 5.36 It currently takes 11-15 minutes to travel the length of the affected 3.2 mile corridor. The table below sets out the additional journey time forecast once the scheme has been implemented, assuming no reduction in vehicle trips takes place as a result of a shift from car to cycle use.

Additional delay	Northbound	Southbound
AM Peak	+ 1 min 52s	+ 51s
PM Peak	+ 1 min 52s	+ 1 min 49s

- 5.37 Several comments and objections were received relating to increased congestion and delays. Assuming no transport modal shift, it is clear from the above tables that there will be some increase in journey times, particularly during the busy peak periods. However, this needs to be off-set against the wider benefits of the scheme, such as better safety for cyclists, improved health of residents and enhanced public realm. In addition, providing the infrastructure to encourage more people to cycle short journeys could help in the medium to long-term to address future congestion.

### Road Safety

- 5.38 A Stage 1 Road Safety Audit was completed since the report was considered by Cabinet. This is a key part of the on-going design process and further safety audits will be completed as part of the detailed design as well as post-implementation.
- 5.39 The Stage 1 Safety Audit has been published on the Council's website and identified a number of issues and concerns relating to the preliminary design, such as:
- Levels of compliance with the new shared pedestrian and cycle 'Tiger Crossings'
  - Risk of conflict between pedestrians and cyclists in town centres and at bus boards
  - Risk of collisions where cycle lanes terminate just before side roads and where the cycle lane crosses side roads
  - Reduced sightlines at certain junctions

- 5.40 Each of the points raised in the Stage 1 safety audit has been considered and taken into account in developing the detailed design. The detailed design itself will be subject to a Stage 2 safety audit prior to works commencing.
- 5.41 A particular concern raised by several consultees related to the risk of conflict between pedestrians and cyclists at bus boarders. Evidence from Camden and elsewhere suggests that bus boarders can be successfully introduced. In addition, the detailed design has been developed to include materials and signage to make it clear that pedestrians have priority at bus boarders. In addition, use of the bus boarders will be monitored and kept under review to help understand how they operate in practise, enabling further mitigation measures to be introduced if necessary.

### **Impact on Blue Badge Holders**

- 5.42 The Local Authorities Traffic Orders (Exemptions for Disabled Persons) (England) Regulations 2000 require that certain traffic orders made by local authorities under the Road Traffic Regulation Act 1984 that prohibit or restrict the waiting of vehicles in roads and street parking places must include a provision exempting any disabled person's vehicle displaying a disabled person's badge. This exempts the holder from waiting conditions in certain circumstances, and from charges and time limits at places where vehicles may park or wait. The proposed traffic orders comply with these requirements. However, several consultees have raised concerns about the impact of the scheme on blue badge holders, mainly because the introduction of a mandatory cycle lane reduces the opportunity for casual parking.
- 5.43 The proposals for disabled parking are summarised below:
- Although reduced in number, blue badge holders will be able to park free of charge in on-street Pay and Display bays in Palmers Green and Winchmore Hill Broadway<sup>1</sup> for up to three hours;
  - Blue badge holders will be able to park free of charge in both the reconfigured Lodge Drive car park and Fords Grove car park (where Pay and Display is proposed to be introduced).
  - Designated bays for blue badge holders will be provided at least in the general locations specified in Schedule 6 of Appendix C, initially on an experimental basis so that they can be reviewed and amended in the light of demand, feedback and operational experience.
  - Blue badge holders will be able to park for up to three hours on both double and single yellow lines, providing there are no loading restrictions in operation at the time. These restrictions are also to be introduced experimentally so that they can be quickly modified in the light of feedback and operational experience.
  - The traffic order enabling the introduction of the mandatory cycle lane varies the national position so that vehicles with a blue badge can enter the lane to pick up and set down.

---

<sup>1</sup> The existing and proposed parking bays in Winchmore Hill Green Dragon provide free parking for everyone for up to two hours

- Along the length of the residential section of the corridor, gaps in the mandatory lane will be provided for loading/unloading which can also be used by blue badge holders to park for up to three hours. These restrictions are also to be introduced experimentally so that they can be adapted quickly if necessary;
- As at present, applications for disabled persons' parking bays will be assessed against the council's adopted criteria, acknowledging that bays may have to be located in nearby side roads rather than on the A105 itself.
- Although not restricted to blue badge holders, all residents fronting onto the A105 will be offered a dropped kerb free of charge to facilitate off-street parking, subject to safety and other relevant criteria.

### **Loss of Uncontrolled Parking**

- 5.44 There is an acknowledgment that the loss of uncontrolled on-street parking along the residential parts of the route may cause inconvenience to some residents in terms of parking and receipt of deliveries. Where possible, residential parking bays have been introduced and, following comments made during the statutory consultation, the relevant traffic management order will be modified so that there will no time constraint on their use.
- 5.45 It is accepted that these proposals will necessitate changes in the way deliveries are made to residential properties along the route, particularly where properties do not have their own private hardstanding areas. Delivery vehicles may need to park in side roads with goods delivered via trolley for the last part of the journey. Where there is not a side road in the vicinity, the design now incorporates a range of 'loading zones' in the residential areas of the route. Vehicles will be able to stop in these for loading and unloading, outside of peak hours (10am – 3pm). The designs have ensured that those residents with a dropped kerb will continue to be able to access their properties.
- 5.46 On balance, the wider benefits that the scheme will bring for the whole Borough in both the short and longer term are considered to outweigh the inconvenience generated for some residents.

### **Value for Money**

- 5.47 A number of respondents to the consultation cited their perception that the proposals would only benefit a very small percentage of the population. This suggests a misconception of what the scheme is trying to achieve. Currently, there are around 4,800 daily journeys by bicycle (less than 1% of total journeys). The initial target is to increase this fivefold to around 24,000 daily journeys. To achieve this, the scheme aims to open up the option of cycling to the full spectrum of the community so that more people can choose to cycle particular journeys where appropriate. Cycle lanes of the quality proposed will enable cycling to become a realistic option as part of the transport mix, a further choice alongside private cars, using public transport or walking. Therefore, the intention is not for a small percentage of the population to cycle

all their journeys, the aim is for a wide cross section of the community to cycle some of their journeys.

- 5.48 As highlighted in the initial bid document and subsequent reports, enabling an increase to the number of journeys cycled, with a view to decreasing short car journeys, can bring benefits for everyone, particularly when considered against a landscape of increasing population levels. As cycling levels increase, there is opportunity for some residents to improve their health and wellbeing, reducing the strain on the NHS for everyone. Improving the look and feel of the high streets has the potential to increase the reputation of Enfield as a 'place' encouraging wider forms of investment in the Borough. At the same time, everyone can benefit from an enhanced streetscape in our high streets and town centres, however they chose to travel. The Council takes a longer term view when considering these benefits, adopting a position that this investment can create the right foundations to realise ever increasing benefits into the future.

### **Bus Stops**

- 5.49 Several people made representations and raised objections about the potential for conflict between pedestrians and cyclists at bus stops, particularly the bus stop boarders.
- 5.50 Both the Stage 1 safety audit and the design appraisal undertaken by Centre for Accessible Environments (CAE) have also raised concerns about bus stop boarders. CAE state that:

*"The design of these stops is of particular concern as pedestrians are required to move onto the cycle lane when alighting and disembarking from the bus. This would be particularly dangerous for vulnerable passengers and wheelchair users using the bus ramps.*

*As the cyclists have not had a change of direction to use cross these facilities there is also a significant risk that they will be travelling at speed along these parts of the path and when accessing this shared surface fail to stop or by pass the area by cycling on the footway behind the bus stop.*

*This does not appear to be a recognised bus layout in any of TfL's guidance and we would strongly advise that this layout is not used as it does not appear to benefit either pedestrian or cyclist and could be a potential hazardous area for all users".*

- 5.51 Although CAE raise particular concerns about the treatment of bus stops, they acknowledge that the overall scheme will offer significant benefits to all users.
- 5.52 Evidence from elsewhere (such as Royal College Street in Camden) suggests that bus stop boarders can operate safely. However, they are a relatively new feature and people's concerns are understandable. To mitigate the risks a 0.5m buffer strip has been provided where feasible so that

someone alighting from a bus will not step directly into the cycle lane. In addition, signage will be erected, the cycle lane will ramp up to footway level, and materials used to highlight to cyclists that pedestrians have priority at bus stop boarders. Use of the boarders will also be monitored post-implementation, both in Enfield and in the other Mini-Holland boroughs where they are being introduced.

### **Conclusions**

5.53 All of the comments, representations and objections received following the statutory consultation have been considered and officers' responses are set out in Appendix B. This groups the responses into one of four categories:

- Objections about the principle of the proposals (Table 1)
- Objections about a common feature of the proposals (Table 2)
- Objections about a specific location (Table 3)
- Objections based on a technical or procedural matter (Table 4)

5.54 On balance, it is recommended that the detailed design be implemented as proposed and that all but one of the associated traffic orders be made without modification.

5.55 However, in response to representations received, it is recommended that the traffic management order introducing free parking places be modified pursuant to the provisions of section 14 of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. The effect of the proposed modification is to remove the two hour time restriction on all of the free parking bays along the residential section of the route. This modification is not considered to be substantial as it is reducing the level of control previously proposed and further consultation is not considered necessary in this instance.

## **6. ALTERNATIVE OPTIONS CONSIDERED**

6.1 The Council could decline the Mini Holland funding. However, this would mean forgoing £8.7 million of investment in the borough on this scheme, £33.7million of investment on other Mini Holland schemes and the associated economic, health and transport benefits.

6.2 At preliminary design stage, we investigated an alternative alignment along the banks of the New River. However, this was ruled out for the following reasons:

- Feeling of safety reduced for users as the route is not overlooked
- Poor access to the areas users wish to get to e.g. shops, banks, libraries, schools, post offices, doctors' surgeries, churches and police stations etc.
- Numerous break points require expensive works to create safe crossing environment for pedestrians and people using bikes

- Longer journey times due to the number of road crossings that would be required
- Little scope to expand infrastructure for future growth in cycling levels
- Insufficient width at several locations to create a two-way cycle facility
- Potential impacts to local wildlife by constructing next to the river
- Lack of connectivity with other transport modes e.g. train
- Would not address road safety for people on Green Lanes

## **7. REASONS FOR RECOMMENDATIONS**

- To make places cycle-friendly and provide better streets and places for everyone;
- To make cycling a safe & enjoyable choice for local travel;
- To create better, healthier communities;
- To provide better travel choices for the 34% of Enfield households who have no access to a car and an alternative travel choice for the 66% that do;
- To transform cycling in Enfield;
- To encourage more people to cycle;
- To enable people to make short journeys by bike instead of by car;
- To increase physical activity and therefore the health of cyclists;
- To reduce overcrowding on public transport;
- To help improve our town centres



## 8. COMMENTS OF THE DIRECTOR OF FINANCE, RESOURCES AND CUSTOMER SERVICES, AND OTHER DEPARTMENTS

### 8.1 Financial Implications

8.1.1 The total estimated cost of construction is £7.6m, which comprises of:

Main works	£6,611,000
Traffic signal works	£544,000
Car Park works	£313,000
Client costs	£120,000
Total	£7,588,000

8.1.2 The above costs will be fully funded by TfL (£6.4m from the Mini Holland programme and £1.2m from the LIP programme (Principal Road Maintenance)).

8.1.3 On 16 September 2015, Cabinet approved the 2016/17 LIP programme, including £1.2m for Principal Road maintenance on the A105.

8.1.4 On 15 June 2016, Cabinet approved the Cycle Enfield spending plans for 2016/17, including £3.1m for the A105 scheme. Of this, £600K is for detailed design and £2.9m is for construction. A further £3.5million will be spent in 2017/18 to complete the A105 scheme..

8.1.5 Expenditure will be fully funded by means of direct grant from TfL. The funding arrangements are governed through the TfL Borough Portal and no costs will fall on the Council. The release of funds by TfL is based on a process that records the progress of the works against approved spending profiles. TfL makes payments against certified claims as soon as costs are incurred, ensuring the Council benefits from prompt reimbursement.

8.1.6 Use of the funding for purposes other than those for which it is provided may result in TfL requiring repayment of any funding already provided and/or withholding provision of further funding. TfL also retains the right to carry out random or specific audits in respect of the financial assistance provided.

### 8.2 Legal Implications

8.2.1 The orders are being made in accordance with the Road Traffic Regulation Act 1984 ("the 1984 Act"), and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996/2489 ("the 1996 Order"). In making the orders, the various procedural requirements have been complied with. Considerations need to be given to the various objections. Whether or not strictly speaking required, the Council has agreed to consider all objections to the proposed orders, including those directed to the overall scheme for the A105.

- 8.2.2 In certain circumstances, a public inquiry needs to be held where objections are made: paragraph 9 of the 1996 Order. That does not apply here (see comments to consultation response at paragraph 76).
- 8.2.3 The proposed orders include a number of experimental traffic controls. These are permitted by section 9 of the 1984 Act for a period of up to 18 months. The use of experimental traffic controls is permitted in a wide range of circumstances, including where the Council wishes to be able to make changes quickly in light of operational experience.
- 8.2.4 It would be open to the Council to hold a public inquiry even though not required to do so. In view of the extensive consultation and engagement that has already taken place, it is not considered that it is either necessary or proportionate to do so in this instance.
- 8.2.5 In deciding whether or not to make the orders, section 122 of the 1984 Act provides that:

“(1) It shall be the duty of every local authority upon whom functions are conferred by or under this Act, so to exercise the functions conferred on them by this Act as (so far as practicable having regard to the matters specified in subsection (2) below) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway .

(2) The matters referred to in subsection (1) above as being specified in this subsection are—

(a) the desirability of securing and maintaining reasonable access to premises;

(b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;

(bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);

(c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and

(d) any other matters appearing the local authority to be relevant.

(3) The duty imposed by subsection (1) above is subject to the provisions of Part II of the Road Traffic Act 1991.

### 8.3 Property Implications

There are no property implications arising from this report.

## 9. KEY RISKS

<b>Strategic</b>	Failure to deliver the scheme for the A105 would impact on the council's strategic aim to deliver a successful Cycle Enfield programme that achieves the associated health, transport and town centre benefits.
<b>Operational</b>	The scheme is forecast to have some impact on both parking levels and journey times along the A105, as outlined in the report. This is balanced by the wider benefits of the scheme (such as better safety for cyclists, improved health of residents and enhanced public realm) and mitigated by a range of measures including the increase in parking at Lodge Drive, the introduction of P&D at Fords Grove, and the provision of dropped kerbs for residents. In addition, the impact of the scheme on journey times has been modelled in detail and agreed with TfL. The council is also committed to monitor the operational impact of the scheme.
<b>Financial</b>	The scheme is estimated to cost the council £7.6m to implement. This risk is mitigated by the funding provided by TfL, which fully covers this cost.
<b>Reputational</b>	By implementing a scheme despite substantial local opposition, it may be perceived that the council is not listening to the views of residents. This is mitigated by clear and on-going communication explaining the wider benefits of the scheme.

## 10. IMPACT ON COUNCIL PRIORITIES

### 10.1 Fairness for All

10.1.1 Extensive consultation and engagement has taken place in relation to the Cycle Enfield proposals for the A105 and a wide range of views have been expressed.

### 10.2 Growth and Sustainability

10.2.1 With forecast growth in the borough, the A105 scheme will help to provide a safe and efficient means of accessing both Winchmore Hill and Palmers Green, contributing to their long-term vitality.

10.2.2 Cycling is a sustainable mode of transport with virtually no environmental impact compared to motorised transport. GLA population projections of an additional 45,526 people in the borough by 2040 indicate that congestion will

become ever more common without a modal shift towards more sustainable transport.

### **10.3 Strong Communities**

- 10.3.1 The A105 scheme will have a positive impact on people living in deprived wards/areas by improving personal health and fitness, with the potential to improve air quality (save for the situation at junctions: see section on 'Air Quality' above). It is recognised that more people on the streets will provide 'passive surveillance' making streets more accessible for communities to use for play, meeting and social activities.

## **11. EQUALITY IMPACT IMPLICATIONS**

- 11.1 The Council has a duty when introducing new policies and making changes to services to have due regard to the need to eliminate discrimination, advance equality of opportunity between persons who share a relevant protected characteristic, and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. This includes persons of different ages, disability, race and sex (along with other protected characteristics). The content of the duty is set out in section 149 of the Equality Act 2010 (attached as part of Appendix E). The particular duties in respect of the disabled should be noted (section 149(4)).
- 11.2 With respect to the proposals for the A105, Council officers have produced an Equality Impact Assessment ("EQIA") (see Appendix E). This identifies whether or not (and to what extent) the proposals have an impact (positive or negative) on a particular equality target group, or whether any adverse impacts identified have been appropriately mitigated.
- 11.3 Cabinet considered the Predictive Equality Impact Assessment for the A105 scheme in February 2016, before granting approval to proceed to detailed design and statutory consultation. This is appended hereto, and due regard should be had to the public sector equality implications. The EQIA and its action plan continue to be reviewed to ensure delivery of the EQIA action plan and impact on the protected characteristic groups are minimised or mitigated.
- 11.4 The recommended traffic management orders and final scheme design include the following mitigation measures over and above those identified in the EQIA as follows:
- Make blue badge holders exempt from vehicular restrictions to enable them to pick up and set down in mandatory cycle lanes
  - Introduce disabled persons' parking bays at the general locations specified in Appendix C, Schedule 6
  - Provide gaps in mandatory cycle lanes for loading and unloading in residential parts of the corridor. Blue badge holders can park in these for up to three hours.

- Convert uncontrolled crossings to zebra crossings e.g. near Regency Court retirement/sheltered housing
- Provide designated loading bay to the rear of the Ruth Winston Community Centre
- Provide buffer strips, ramps, signage and distinctive paving at bus stop boarders
- Provide three rows of setts to demarcate cycle lanes from pedestrian areas in town centres

11.5 In addition, the following steps will be taken following implementation of the scheme:

- Offering site visits to disability groups to familiarise their members with the new infrastructure
- Arranging for travel ambassadors to be available to explain how bus stop boarders work

## **12. PERFORMANCE MANAGEMENT IMPLICATIONS**

12.1 The proposal supports the commitment in the Council's Business Plan to:

- Maintain a clean, green sustainable environment
- Work in partnership to ensure that Enfield is a safe and healthy place to live

12.2 Specifically, the scheme forms a key element of the wider Cycle Enfield programme which aims to deliver both environmental and health benefits.

## **13. PUBLIC HEALTH IMPLICATIONS**

13.1 Cycle Enfield provides a unique opportunity to improve the health of the borough's residents and address health inequality. Physical inactivity is recognised as the fourth leading cause of mortality worldwide.

13.2 Compared to those who are least active, sufficient physical activity reduces all-cause mortality and the risk of heart disease, diabetes, breast and colon cancer, energy balance, mental health issues and musculo-skeletal disease by approximately 20 to 40%. These conditions account for 70% of the NHS budget.

13.3 The greatest gain in the health of the public will be from increased physical activity. However, other benefits are likely to accrue to the wider Enfield community including the avoided costs of motorised transport. These include avoided air pollution, congestion, noise, community segregation and increased financial resilience that result from a long-term modal transport shift towards cycling.

**Background Papers**

None

**List of Appendices:**

- Appendix A: Scheme drawings
- Appendix B: Response to objections
- Appendix C: Orders to be made & other features
- Appendix D: Traffic Order Notice
- Appendix E: Equality Impact Assessment

## **Appendix C – Traffic Orders and Feature to be Implemented**

### **Schedule 1 - Orders to be made without modification**

- a) Enfield (Cycle Lanes) No. 1 Order 20\*\*,
- b) Enfield (Parking Places) (Pay and Display) (No. \*) Order 20\*\*
- c) Enfield (Goods Vehicles Loading Bays) (No. \*) Order 20\*\*
- d) Enfield (Prohibition of stopping on Cab Ranks) (Special Parking Area) Traffic Order 20\*\*
- e) Enfield (Residents' Parking Places) (Enfield Town) (No. \*) Order 20\*\*,
- f) Enfield (Residents' and Shared Use Parking Places) (Queens Avenue) (No. \*) Order 20\*\*
- g) Enfield (Bus Lanes) (No. \*) Traffic Order 20\*\*
- h) Enfield (Prescribed Routes) (No. \*\*) Traffic Order 20\*\*
- i) Enfield (Prescribed Route) (No. \*\*) Traffic Order 20\*\*

### **Schedule 2 - Order to be made with modification**

- a) Enfield (Free Parking Places) (No. \*) Order 20\*\*

Proposed modification: Removal of the restriction on free parking places in residential areas limiting the length of stay to a maximum of two hours.

### **Schedule 3 – Traffic Calming Features to be introduced**

All features specified in schedules 1, 2 and 3 of the notice included as Appendix D

### **Schedule 4 – Zebra Crossings to be Introduced**

- a) outside No. 436 Green Lanes N13
- b) outside No. 1 to No. 6 Crestbrook Place, Green Lanes N13
- c) outside 10 to 20 Stefan House, Green Lanes N21,
- d) outside No. 701 to No. 713 (Compton Lodge), Green Lanes N21
- e) outside No. 140 and No. 142 Park Avenue EN1
- f) outside No. 105 London Road EN2.

The associated zig-zag markings would be placed adjacent to the crossing and between the points specified in Schedule 4 of the notice included as Appendix D.

### **Schedule 5 – Tiger Crossings to be Introduced**

- a) outside No. 239 Green Lanes N13
- b) outside No. 604 Green Lanes N13

- c) outside No. 792 Green Lanes N21
- d) outside No. 824, No. 826 and No. 828 Green Lanes N21
- e) outside No. 944, No. 946 and No. 948 Green Lanes N21
- f) outside No. 123 Park Avenue EN1
- g) outside No. 79 London Road EN2

The associated zig-zag markings would be placed adjacent to the crossing and between the points specified in Schedule 5 of the notice included as Appendix D.

**Schedule 6 – Disabled Persons’ Parking Bays to be Introduced Experimentally**

Disabled Persons’ Parking Bays at least in the following general areas:

- a) London Road, south of Roseneath Walk
- b) Village Road (not A105) by St Stephen’s Church
- c) A105 near to Vicars Moor Lane junction
- d) A105 close to Shrubbery Gardens junction, by Post Office
- e) Station Road near to its junction with Green Lanes
- f) Compton Road near to junction with The Broadway
- g) A105 near to Woodberry Avenue (day time only)
- h) A105 near to Gillian House Surgery
- i) Hazelwood Lane, near to Green Lanes
- j) Lodge Drive, near to Green Lanes



## **A105 Statutory Consultation – Response to Objections**

### **1.0 Statutory Consultation Period**

1.1 Statutory consultation for the A105 project was held from Wednesday 6<sup>th</sup> July to Friday 29<sup>th</sup> July 2016. The purpose of this consultation was for interested parties to consider the published draft Traffic Management Order (TMO). There was also an opportunity for the revised drawings and associated impact assessments to be considered. Following consideration of this information, if they felt appropriate, interested parties were invited to submit objections to the proposals.

1.2 Notice of the statutory consultation period and publication of the TMO was carried out in the prescribed way, through publication in the Enfield Independent, Advertiser and London Gazette Press. The draft TMO was also fixed to lampposts along the route. However, in addition to this, over 17,000 thousand leaflets were also distributed to homes and business on and around the proposed route.

1.3 During the consultation period revised drawings, the detailed draft TMO and a range of other impact assessments for this scheme were all available for public viewing, both online and at the Civic Centre. The leaflet distributed to homes and businesses summarised the key elements of the scheme and invited readers to consider the full detail available.

1.4 Both the draft TMO and the additional leaflet clearly stated that any objections that wish to be raised should be done so in writing. In order to streamline this process for respondents, a simple objection form was added to the Cycle Enfield website where individuals could state the specific location and nature of their objection. If individuals did not wish to use the online form, the postal address to write to was stated on both the distributed leaflet and the draft TMO.

### **2.0 Participation**

2.1 Objections were received via the online process, by e-mail and in writing. All objections, however they were received, have been considered. It should be noted that the use of references on draft TMO is standard practice in order to help differentiate objections from different draft TMOs that maybe published concurrently at different locations across the borough. However, in this high profile statutory consultation, it was clear which objections referred to the A105 scheme and as such, all objections were considered, irrespective of whether they included the reference stated on the draft TMO or not.

2.2 Objections were received via a range of sources. This included the online objection form on the website, copies of a paper based version of the online questionnaire, templated letters of objection from local businesses, individual letters from local residents / businesses and e-mails to a corporate Enfield Council e-mail address. The number of objection received totalled a little less than 1600. It should be noted that this represents a high number of overall objections. However, when considering the total number of objections, the following points are also relevant:

- a. There is evidence that some objections were duplicated and submitted both electronically and in writing. There is no suggestion that this was an attempt to increase the number of objections, rather just a desire to ensure that the objection was received. It was not deemed necessary to allocate resources to the task of quantifying the level of duplication. Instead the focus of the review was to ensure that the full range of objections was considered.
- b. Likewise, it is the substance of the objections that must be evaluated when considering responses. All objections have been considered, ensuring singular

issues raised by just one individual were considered in the same way as the broader objections that were received in greater volume.

c. Finally, it should be noted that there was an active campaign to increase the level of objections and a local campaign group distributed approximately 15,000 leaflets encouraging people to object and providing a series of objections that people may wish to express. A copy of this leaflet is at Annex A and content of this should be reviewed<sup>1</sup>. It is not possible to determine the extent to which individuals who raised objections relied solely on the information provided by this campaign group, or the extent to which they individually reviewed the detailed information available and formed their own view. However, it is clear that when asked for the location of the objection, in the region of 75% of the online responses (accounting for approximately 1000 of the objections) used the phrase 'The whole of the A105 cycle lane scheme from Enfield Town to Palmers Green' (or very similar) as directed in the campaign leaflet. These responses predominantly provided objections in principle to the scheme rather than a specific objection. Furthermore, the majority of the letters that were received from local businesses (received collectively in one envelope) are all based on one of 4 generic templates which have then been signed by individual business owners. Copies of these generic letters are at Annex B (any personal details are redacted).

### 3.0 Objections Raised

The statutory consultation resulted in objections that can broadly fall into one of four groupings. Objections within each of these groupings will be addressed in the following sections of this report:

- a. Objections about the principle of the proposals (Table 1)
- b. Objections about a common feature of the proposals (Table 2)
- c. Objections about a specific location (Table 3)
- d. Objections based on a technical or procedural matter (Table 4)

### 3.1 Objections about the principles of the proposals

3.1.1 These objections are listed in no particular order:

**Table 1**

Ref	Nature of Objection	LBE Response
1	Objection to the proposals on the grounds that they will have a negative impact upon businesses along the route.	The grounds of the objection appeared to be focused on the impact on car parking in the high street areas. Following previous engagement and consultation events, the majority of high street car parking is retained in the designs, as much as 91% in some areas of Palmers Green, with 70% retention in the areas with the greatest

<sup>1</sup> One suggested objection appeared to cause significant concern. The leaflet encouraged people to 'Object to preventing Blue Badge holders from parking along the entire length of the cycle lane route. **Enfield will be the first Outer London Borough to remove the Blue Badge scheme from its shopping areas**'. The suggestion that this was part of the draft TMO is completely inaccurate and may well have caused distress to those who may have believed that this was part of the proposals.

		<p>reductions. Additional measures will be taken to increase shopper parking capacity by re-designing Council car parks and introducing zones of free parking for 45 minutes. The majority of people arrive to our town centres by walking or bus, but car parking remains an important component of developing successful town centres so rightly forms a central part in the design of the scheme. The proposals have been subject to an independent economic assessment. This report identified a range of potential impacts that could result from this scheme. Whilst it is not possible to predict the exact impact of this scheme, the report concluded that although the scheme may have some minor negative impact during construction, once the scheme was in place the scheme was likely to have a negligible impact on town centre viability. A number of risk mitigation measures were proposed which the Council would implement, reducing further any risk in the shorter term.</p>
2	<p>Objection to the proposals on the grounds that there is insufficient evidence to support the proposition that these proposals will increase cycling levels.</p>	<p>The development of safe cycling infrastructure in towns and cities across the UK has seen an increase in cycling levels. Enfield have conducted surveys across the Borough and were told that the best thing that the Council could do to encourage people to cycle is to create safe cycle routes.</p>
3	<p>Objection to the proposals on the grounds that the Borough already has cycle lanes that seem to be little used.</p>	<p>Whilst the Borough does have a number of cycle lanes, these do not form part of a considered network. To encourage mode shift, a coherent network needs to be created that enables people to find a route that connects the different destinations that they wish to travel between. The mini Holland funding enables the Borough to create this network over a relatively short period of time. Like any other transport system, this network is comprised of key main road routes, allowing direct and convenient travel and a further series of (greenway) routes on quieter streets. It is the accumulation of this comprehensive network which should accelerate the increase in cycling journeys.</p>
4	<p>Objection to the proposals on the grounds that they will increase pollution, considering the changes to junctions and narrowing of lanes.</p>	<p>The air quality report for this scheme acknowledges that there is likely to be some increases in some increase in NO<sub>2</sub> concentrations at junctions where there are some increases in queue length and delay time. However, the report states that the areas of these increases will be much smaller than the area of air quality improvements along the rest of the route, with reduced traffic flows at 2.5%. These improvements are small (between 0.25 µg/m<sup>3</sup> and 0.5 µg/m<sup>3</sup>) but have the potential to increase if a greater mode shift from private car to cycling is achieved in the future. This shift is unlikely to occur if the Council does not adjust the road network to create safe infrastructure to</p>

		encourage more people to cycle.
5	Objections to the proposals on the grounds that they will have a negative impact on the emergency services and response times.	<p>Through the majority of the route, the cycle lanes are formed from 'light segregation' a series of rubber blocks placed at intervals along the route to provide some separation between motor vehicles and people cycling. However, this does not mean that this space is completely inaccessible to motor vehicles in an emergency scenario. The scheme is designed to encourage modal shift and is intended to reduce the number of private motor vehicles on the road. If achieved, this will help reduce the pressure on the network which would ultimately improve the ability of emergency response vehicles to navigate the Borough. Conversely, as the population grows, if alternative transport methods are not pursued, the network will come under increasing strain, hindering further the ability for emergency vehicles to navigate the streets.</p> <p>The Metropolitan Police have been involved with the development of the A105 scheme since the outset and provided comments that helped shape the design. Previous comments from the Police stated "Overall the Metropolitan Police support the proposals, which should improve safety for cyclists using these routes....."</p> <p>The London Ambulance Service has not objected to the proposals but would be concerned about changes to roads that increase congestion or hinder the movement of ambulances responding to emergencies or taking patients to routine appointments.</p> <p>The London Fire Brigade has no objections to the A105 proposals as presented.</p>
6	Objection to the proposals on the grounds that private residences along the route will be unable to receive deliveries including building materials, placement of skips and ability for removal vans to load when residents move home. The Council should consider this impact in line with its obligations to provide a means to provide normal facilities to all households.	In the residential sections of the corridor, where there is no side road in close proximity to a property, it is proposed to introduce sections of single yellow line that will permit off-peak loading, which will allow for deliveries and loading. Applications for skips to be placed in the cycling lane for extended durations are likely to be refused.
7	Objection on the basis that the proposals are a waste of public money and funds should be spent on other council services.	The Mini Holland funding can only be spent on delivering the Mayor's Cycle Vision for London. If Enfield doesn't use it, it is likely the funding would be allocated to another London borough. This investment cannot be spent on other council services.
8	Objection on the grounds that motor vehicle drivers will turn surrounding roads into 'rat runs' as drivers seek to avoid any congestion that is created on the A105.	The Quieter Neighbourhood initiative, part of the overall programme, will follow implementation of the main road route routes. This will be a community-led initiative where interventions to prevent 'rat running' can be explored.
9	Objection to the proposals on the basis that alternative routes have not been	Alternative routes have been considered. The New River route at this intersection was not

	considered prior to the publication of the draft TMO and throughout the informal consultation stages.	deemed to be suitable as a primary route and the reasons for this have been described on the Cycle Enfield website. This explanation is still online and has been in place prior to the informal consultation which started in July 2015.
--	---	---

### 3.2 Objections about a common aspect of the proposals

3.2.1 These objections are listed in no particular order:

**Table 2**

Ref	Nature of Objection	LBE Response
10	Objection that cycle lanes will cause difficulty of access to those properties along the route with a crossover to property. Including the potential for causing congestion when leaving properties, having to reverse into a narrowed lane and potentially hindering traffic progression in both directions, leading to congestion.	Properties with crossovers will retain them as part of the proposed scheme. The light segregation will be positioned to enable residents to access their properties so there will be little or no impact on the existing situation in terms of property access.  The frequency of vehicles exiting residential properties on the corridor will be low and will have a negligible impact on congestion, compared to the existing situation, for vehicles reversing out of properties.
11	Objection to all speed tables, raised junctions and entry treatments because they are perceived to hinder emergency services, cause discomfort to bus passengers and damage motor vehicles.	Speed tables, raised junctions and entry treatments are recommended treatments to reduce traffic speeds, increasing safety for all road users. Ramps will be designed to the latest standards, which seek to minimise the impact on emergency vehicles and bus passengers. These have been successfully used elsewhere.
12	Objection to the reduction of residential parking along the route.	Parking along the corridor has been retained where possible. Parking surveys have been carried out which show spare capacity on the side roads to offset the loss of on-street parking. The majority of properties also benefit from off-street parking and the Council will consider requests for vehicle crossovers where on-street parking is displaced by Cycle Enfield.
13	Objection to the reduction of parking in town centre areas on the grounds that this will negatively impact business.	An economic assessment has been undertaken which takes into consideration the loss of parking and this assessment showed a negligible impact on businesses.
14	Objection to the removal of additional parking that becomes available in the evening to support the night time economy (parking on yellow lines).	To offset the loss of yellow line parking in the town centres the car parks at Lodge Drive and Fords Grove will remain open later into the evening, with free parking after 6.30p.m.
15	Objection on the grounds that the proposals include the restriction of parking to one side only of the road almost throughout the entire route and this will cause considerable difficulties for both residents and businesses.	Locating parking on one side of the road allows for a greater number of spaces to be provided, as opposed to staggering them on either side of the road. It is not possible to accommodate parking on both sides of the road, along with cycle facilities. The vast majority of parking has been retained in the retail areas and is supplemented by additional retail parking in the

		Ford's Grove and Lodge Drive car parks.
16	Objection to the introduction of 'tiger crossings' on the grounds of safety.	The proposed parallel pedestrian and cycle crossings form part of the latest 'The Traffic Signs Regulations and General Directions' and are a recommended design in the London Cycle Design Standards. These are proposed across the five main corridors and will become a locally recognised feature. Monitoring will take place post implementation to review the operation of the crossings.
17	Objection that a number of zebra crossings will have central refuge removed which means having to cross both direction at one time and leads to longer waiting time for motorists / cyclists.	The resulting delay by the removal of the central islands at the crossings is not considered to be significant and will benefit pedestrians, as well as cyclists, where the crossings also provide a cycle priority crossing. It was necessary to remove the islands at crossing to accommodate a cycle lane and traffic lane of a safe width through the crossing.
18	Objection that the cycle track through the town centres and in certain other locations has created shared space that will generate conflict between pedestrians and cyclists.	The cycle lane is located between the parking and footway to mitigate conflict between vehicles and cyclist and to create a visibly wider public realm with better separation between cars and pedestrians. If the cycle lane were to be located between the parking and carriageway, there would be conflict between cars entering and exiting the parking and cyclists. A 0.5m buffer has been introduced between the cycle lane and the parking to mitigate 'dooring'. The cycle lane will have a distinct material and tonal difference to the footway and a border, a textured finish is provided for greater clarity and segregation to assist visually impaired users.
19	Objection to the bus stop boarder design on the grounds that it creates a danger for pedestrians.	Monitoring of the bus boarder on Royal College Street has been undertaken by Camden who reported no incidents since its implementation. Monitoring of the bus boarders will be carried out following implementation and also at locations across the other mini-Holland boroughs, where they have been or will be implemented.  The proposed design introduces signage, different materials and a change in level at on the bus boarders, so that cyclists are aware that they should slow down and that pedestrians have priority.
20	Objection to the bus stop boarder design on the grounds that the buses will need the hydraulic step to be lowered to enable people to reach the carriage way level (in the cycle lane) prior to reaching the pavement.	This is not the case. The bus boarder will be at footway level, so the bus will pull into a kerb with an upstand, as currently takes place.
21	Objections that the bus boarder design will prevent buses from waiting at stops to help regulate the service.	Whilst a number of bus stops are relocated in-carriageway and therefore buses will not be able to stop to regulate services, there are stops on the route that still allow overtaking, where waiting can take place. It should also be noted that only the 329 route runs for the length of the corridor, and therefore other routes using the corridor would have scope to wait on other sections of the

		route before or after they join the A105.
22	Objection about restrictions for blue badge holders on the grounds that the proposals prevent blue badge parking along the whole route.	Under the proposed scheme blue badge holders will be permitted to pick-up and set-down within the mandatory cycle lanes. Blue badge guidance states that when you are being carried as a passenger, or when you are being set-down or picked up, the driver is allowed time to accompany you to your destination, including taking you into premises near to the vehicle. Blue badge holders are also permitted to park where provision for loading is proposed along the route. Should a resident wish to apply for a dedicated disabled bay, then this will be considered by the Council, although it is acknowledged that it may not be possible to locate a dedicated bay on the A105, directly outside someone's' home.
23	Objection to the design of the cycle lane running on the inside of parking and loading bays on the grounds that this is unsafe.	Cycle lanes have been located between the parking/loading bays and the footway to remove the conflict between vehicles entering and exiting the parking/loading bays and people cycling, if the lanes were located between the parking/loading bays and the carriageway. A 0.5m buffer strip is proposed between all bays and the cycle lane to mitigate the risk of 'dooring'.
24	Objection to the reduction in lane width on the grounds that it will create difficulty for buses on the route.	Consultation with TfL bus teams has taken place and they accept that 3.25m per lane is sufficient for 2 large vehicles to pass each other. All lane widths are a minimum of 3.25m in each direction.
25	Objection to the draft TMO in respect of restrictions for motor vehicles entering the cycle lane on the grounds that this will have a negative impact on the loading and unloading provision for both business and residents along the route.	The volume of formal loading bays within the town centres has been retained or increased. In some locations loading has been relocated within the town centre to accommodate as many parking bays as possible. Loading on the residential sections will be possible either from side roads, or where side roads are not within a reasonable distance to a property, regular 'loading zones' will be provided to allow off-peak loading within the cycle lane.
26	Objection that in a number of locations (e.g. Barrowell Green) the zebra crossing does not span the full area from one pedestrian space to another, leaving pedestrians to cross cycle lanes without any suggestion that they have priority of movement.	Where there is a parallel pedestrian and cycle priority crossing, linking in with a Greenway, such as the crossing at Barrowell Green, it is necessary to introduce a section of shared space so that cyclists can access the crossing to and from the Greenway. The shared space will be clearly marked so that pedestrians and cyclists are aware of the shared space.
27	Objection that the cycle lanes are not wide enough and will cause danger to cyclists when attempting to overtake slower riders by having to move into the lane of motor traffic.	Where there is scope to do so, cycle lanes are 2.0m wide. However, there is a need for some sections of the cycle lane to be narrower to accommodate traffic lanes, parking and footways of an acceptable width. Cyclists pulling into the carriageway to overtake would be expected to wait for a suitable gap in motor traffic to undertake this manoeuvre safely.
28	Objection on the grounds that more 20mph zones are not proposed along the route.	Carriageway widths have been narrowed in order to achieve a slower average speed on the corridor. Post implementation monitoring will take place and should this highlight areas where traffic speeds remain high then a formal 20mph

		limit will be considered.
29	Objection on the grounds that there is nothing to prevent motor cyclist using the lanes.	The Traffic Signs Regulations and General Directions 2016 stipulates that motorcyclists are not permitted within mandatory cycle lanes and this will be enforced along the route.
30	Objection because refuse collection vehicles will block the carriage way causing more congestion.	Council vehicles, including refuse collection vehicles, will be permitted in the cycle lanes to minimise the impact on congestion.
31	Objection on the grounds that there insufficient capacity in side roads for additional parking.	Surveys have shown that whilst some side roads are heavily used for parking, there is spare capacity on some sides and this along with the retention of some on-street parking and the existing off-street parking at the majority of properties on Green Lanes will provide sufficient space. It should also be noted that the Council will consider applications for crossovers, where properties do not currently have a crossover.
32	Objection to the proposed introduction of time restrictions to the residential parking bays along the route.	By introducing a time-limit during the working day the Council is seeking to prevent vehicles being left indefinitely along the residential sections, for example, by commuters, but retain the ability for residents to park overnight for free. By permitting free parking for 2 hours during the period 8am to 6.30 pm, this would allow visitors, deliveries etc. to residents to take place throughout the day. The Council have reviewed this and will implement the scheme without restrictions on the bays in the residential areas and review the usage as part of the monitoring strategy.

### 3.3 Objections about a specific location

3.3.1 These objections are listed in no particular order:

**Table 3**

Ref	Nature of Objection	LBE Response
33	The draft TMO states that cycle lanes will be introduced from Ecclesbourne Gardens N13 to Cecil Road EN2, but this is a mis-description because the cycle lane stops short of Cecil Road.	As part of this draft TMO the intention is to retain the bus lane. However, the cycle lane will extend the full length of this part of London Road, but this northern section will now be considered as part of the revised design for the Enfield Town project. Wherever possible, the ambition remains to build continuous routes, but the implementation of the complete network will need to be delivered in stages.
34	Objection to the design of the cycle lane where it joins the service road at the northern end of London Road. The objection is based on the suggestion that the design encourages people cycling to move from the road to the cycle lane at speed and that this has the potential to cause conflict with pedestrians moving	The radius of the proposed cycle lane entering the shared space is designed to reduce cycle speeds on the approach. Different materials will be used along the shared area, to make it clear to cyclists, pedestrians and general traffic that they are entering a shared space environment, and this will be complemented by signage.



	from the pavement to this shared space environment.	
35	Objection to the closure of the London Road service road on the grounds that it will have a negative impact on the businesses in this area owing to inability to deliver, in particular Majestic Wines and the Fish & Chip shop.	Access to the Majestic Wine car park will still be permitted under the proposed scheme. The parking in the service road has been relocated to the carriageway. The proposed bays are 2.5m wide to accommodate a loading vehicle.
36	Objection to the proposal to make Park Crescent part of the Enfield Town Controlled Parking Zone on the grounds that the majority of the residents of this road have not been consulted on this proposal.	The draft TMO did not make a proposal to consume Park Crescent into the Enfield Town CPZ. However it did make a proposal to create a 2 car bay at the very top of Park Crescent, to replace an existing bay that is being removed from London Road. These 2 bays would then form part of the Enfield Town CPZ.
37	Objection to the removal of the central refuges on the corner of Park Avenue, Bush Hill, Uvedale Road and London Road on the grounds that removal will increase the danger of collision, compounded by the narrowing of the lane, especially so at night.	The island has been removed to retain acceptable lane widths for large vehicles vehicle undertaking the turning movement. The retention of the island would result in lane widths which would be too narrow to safely accommodate a large vehicle.
38	Objection to the introduction of a new zebra crossing at the north end of Park Avenue on the grounds that the sight lines are insufficient.	<p>The proposed visibility splay is 33.8m.</p> <p>ATC data shows that the mean speed is 22.6mph and 85%ile of 25.9 at a comparable location (Green Dragons Lane to the south of Bush Hill on the A105).</p> <p>The proposed scheme reduces carriageway widths and the area is on a raised table and is therefore likely to reduce speeds, compared to existing.</p> <p>Assuming a speed of 25mph the recommended Stopping Sight Distance (SSD) is 33m, at 20mph this is 25m.</p> <p>The need for additional warning signs and other possible mitigation measures will be reviewed as part of the Stage 2 Road Safety Audit</p>
39	Objection to the footpath being narrowed to less than 2 meters by the South bound 'Church Street' bus stop on the grounds that it will be awkward for pedestrians to pass, particularly because of the sharp edge wall in this location.	The layout has been amended so that a footway width of 2.0m is available at the corner of property 122 Village Road. Land has been acquired to the south of this so that the bus stop can be retained in close proximity to the shops, as well as parking.
40	Objection to the design of the Village Road / Ridge Avenue junction on the grounds that there is confusion over whether the diagonal crossing is for pedestrians as well as cyclists, concerns over whether the time available will be sufficient to cross and concerns over conflict between pedestrians and cyclists. If the times available to cross are extended there are further objections to the congestion this will cause by vehicles having to wait for longer times at this junction.	<p>The diagonal crossings are for cyclists only and will be clearly marked with cycle logos and 'Elephants footprints' markings. The period of time provided for pedestrians to cross the Toucan crossings meets the latest design standards. Countdown timers will be provided on the signalised crossings to provide greater clarity on the time left to cross.</p> <p>Where Toucan crossings have been proposed the crossings have been widened to accommodate cyclists and pedestrians.</p> <p>The reason for the diagonal crossings operating</p>

		as cycle only, is to reduce the required time between signal phases, maintaining an acceptable level of capacity at the junction for general traffic and buses.
41	Objection that no loading is provided for businesses at Avenue Parade & Bush Hill Parade.	The service road at Avenue Parade has been retained, where loading can take place The existing parking has been retained on Church Street and two additional bays have been proposed on Village Road, south of the bus stop. Bush Hill Parade also benefits from rear access, which will not be affected by the scheme.
42	Objection to the design of the Green Dragon Lane junction on the grounds that congestion will be created by vehicles turning and that it is difficult for pedestrians to cross.	The traffic island on Green Dragon Lane has been retained, so pedestrians will not have to cross both movements at the same time. The proposed design also retained a right-turn pocket so it is not anticipated that there will be any impact on congestion at the junction. The crossing to the north replaces an existing advisory crossing, which will benefit pedestrian crossing the A105.
43	Proposal for contraflow cycling along Devonshire Road based on the perception that this will be dangerous.	The conversion of one-way roads to two-way working for cycling is recommended in the London Cycle Design Standards, with the following extract taken from the standards. <i>'Unless there are over-riding reasons not to, there should be a presumption that contraflow cycling should be provided in any one-way street'</i> This arrangement is already in place at several locations throughout the Borough with no reported problems.
44	Objection to the retention of taxi rank on Alderman's Hill, believed to be superfluous.	Taxi ranks are a vital part of the transport network and help ensure that taxi services can meet passenger demands. More than a third of taxi journeys completed in London each year originate from a taxi rank. Ranks are also of particular importance to passengers with mobility issues or those starting their journey in suburban areas. As a result the proposals look to retain the taxi rank in the vicinity of the station and the Palmers Green triangle, which are considered key trip generators.
45	Objection on the grounds that the Barclays Bank security vehicle will be required to stop in the carriageway and block left turning traffic moving down Aldermans Hill.	Under the proposed scheme a loading bay is located between Alderman's Hill and Devonshire Road which will allow loading, including a security vehicle, without blocking the left turn lane.
46	Objection that 'The Triangle' has not been merged into the footway space and t-junction created at Aldermans Hill which would have created a more enhanced area of public realm.	The concept design at the bid stage proposed the removal of the triangle island. However, a number of objections were raised against the removal of Palmers Green Triangle so the Council made the decision to take forward the option which retains the Triangle based on the objections at the time.
47	Objection to increased opening hours to Lodge Drive Car Park on the grounds that this will generate anti social behaviour (as previously experienced).	The upgraded and expanded car park is proposed remain open later into the evening to support the evening economy in Palmers Green. Access controls will be introduced so that vehicles cannot enter the car park after a

		specified time, but those already in the car park will be able to exit. This, together with amendments to the car park design, improved lighting and CCTV should ensure that past problems with anti-social behaviour do not recur.
48	Objection to the merger of the two northbound bus stops in Palmers Green on the grounds that this will increase the distance people need to walk to access a bus stop and increase pedestrian congestion around a singular stop.	The bus stops have been merged to retain more parking within the town centre. The distance between the existing Fox Lane bus stop and the proposed stop is 90m and from the Lodge Drive stop the distance is 70m, with the proposed stop centrally located on the high street. A bus by-pass with a 2.5m build-out has been proposed to accommodate passengers waiting to board.
49	Objection to the removal of the crossing just south of Hazelwood Lane on the grounds that pedestrians will continue to cross the road at this location which will be dangerous and create congestion.	The signalised crossing south of Hazelwood Lane has been relocated north as it is currently below the latest design standard regarding the proximity of a side road (Devonshire Road) to a crossing. The crossing to the north is offset further from a side road and also increases the amount of parking on the high street.
50	Objection to the proposal for a t-junction at Fox Lane on the grounds that it will create tailbacks along Fox Lane and encourage 'rat running'.	The replacement of a roundabout with a priority junction has been proposed to better protect cyclists through the junction, as recommended in the London Cycle Design Standards. The proposed priority junction will also reduce delays on the A105, which will benefit buses and general traffic. Post implementation monitoring will be carried out and mitigation implemented, where appropriate, should rat running be an issue.
51	Objection to the prevention of northbound vehicles turning left into Station Road.	Vehicles will be permitted to turn left onto Station Road via the slip road. However, vehicles will be banned from turning left at the signalised junction, due to the tight radius.
52	Objection on the grounds that traffic signals at Station Road will create tailbacks and congestion by the narrow bridges at Fords Grove and Farm Road.	Modelling of the proposed junction has been carried out and audited by TfL and the resulting impact on capacity and delays are considered acceptable by both Enfield and TfL for the proposed scheme.
53	Objection that the bus stand at Station Road is inadequate and that at times it is required to hold 2 waiting 125 buses and as such requires space for three buses.	The proposed stand can accommodate 2 standing buses with the third bus able to pull forward to the bus stop to the south, which will be the start of the northbound 125 route. The bus stand and stop locations have been agreed and approved by the TfL London Bus team.
54	Objection that the cycle lane cuts through the area by the Station Road bus stand making it unsuitable for pedestrians.	The width of the footway is approximately 6m, which is sufficient space to accommodate a cycle lane and adequate footway.
55	Objection that the pedestrian crossing provision from the bus stand to access Winchmore Hill railway station is inadequate.	Currently there are no formal crossings at the Fords Grove/Station Road roundabout. With a zebra crossing located to the south. It is not possible to provide signalised crossing facilities on all arms of the junction without oversaturating the junction, which would result in significant

		delays to buses and general traffic. The proposed scheme introduces a signalised crossing on Station Road, with a staggered signalised crossing on the southern arm of Green Lanes. The existing informal crossing on the northern arm of Green Lanes has been retained under the proposed scheme, which is comparable to the existing facility.
56	Objection to prevention of southbound vehicles using the slip road from the A105 into Hedge Lanes. It is perceived that this restriction will create difficulties for left turning HGVs and put pedestrians at risk.	Left hook collisions — where a motor vehicle turning left hits a cyclist — were involved in nine of London's fourteen cycling deaths in 2013. The left turn has been relocated to within the junction, to prevent left turn hook collisions occurring between ahead cyclists and left turning traffic. The traffic islands on Hedge Lane have been relocated east of their existing location to allow HGVs to safely make the left turn movement. The removal of general traffic from the slip road will make this easier to cross for pedestrians, with an average use of the stand being less than three times per day.
57	Objection to the lack of signalised pedestrian crossing points at the Hedge Lane / Green Lanes junction.	<p>Traffic controlled pedestrian crossings were considered at this junction. However, the modelling assessment showed that the introduction of signalised crossings would have a significant impact on the network resilience and would result in significant queues and delays to general traffic and the bus routes along the corridor. Therefore, based on the need to maintain network resilience, pedestrian crossings could not be implemented at this location.</p> <p>In the existing situation the time between the Green Lanes traffic phase terminating and the side roads receiving a green is 13 seconds. In the proposed situation there will be a period of 20 seconds where only cycle movements are permitted and the general traffic is held, where pedestrian could cross to the central islands or across the entire width of the carriageway.</p>
58	Objection to the upgrade of the informal crossing point by St Monica's Church to a zebra crossing. The objector acknowledges that it would create a safer crossing facility but objects on the basis that zig zag lines utilise space that could be otherwise used for car parking.	Given the need to remove the existing advisory crossing island to accommodate the cycle lane and feedback from the public consultation, it was considered essential to retain a crossing provision in this location, given the proximity to St Monica's Church.
59	Objection to how close bus stop boarders are located to junctions specifically at Firs Lane, Regency Court and Park Avenue, where there is a perceived issue of visibility and potential for conflict at junctions where people in motor vehicles are turning left and people cycling are travelling straight on.	<p>At Firs Lane the bus stop is located in carriageway and will therefore hold traffic until it pulls away, allowing visibility of a nearside cyclist for traffic behind the bus.</p> <p>At Park Avenue the cycle lane has been offset to allow a car to turn in and then give way to a cyclist, without blocking back onto the A105.</p>

		The proposed bus stop near Regency Court has been relocated as a result of the feedback from the public consultation.
60	Objection to the removal of the southbound bus lane between The Triangle and the A406 on the grounds that will increase journey times.	The bus lane has been retained between Alderman's Hill and Oakthorpe Road. A section of bus lane has been removed between the junction of Oakthorpe Road and Ecclesbourne Gardens, to accommodate the cycle lanes. Modelling has been carried out, which shows the average peak hour queue does not block back beyond the length of the proposed bus lane. The effective length of the bus lane is extended by the two lane approach to the zebra crossing at Palmerston Crescent, which is fed by a single lane to the north with the bus lane starting immediately to the south. It has not been possible to retain the bus lane to its existing length due to the narrower carriageway on the bridge.
61	Objection that there is nowhere to park for disabled visitors to Gillian House Surgery at 457 Green Lanes, N13 4BS.	<p>Access to the off-street parking at Gillian House would be retained as part of the scheme, with the current off-street parking restriction associated with the surgery retained.</p> <p>Parking is available on the eastern side of Green Lanes between Park Avenue and Osborne Road, as part of the proposed scheme, as well as the existing side road parking off the A105.</p> <p>Under the proposed scheme blue badge holders would be permitted to pick-up and set-down within the mandatory cycle lanes. Blue Badge guidance states that when you are being carried as a passenger, or when you are being set-down or picked up, the driver is allowed time to accompany you to your destination, including taking you into premises near to the vehicle. The Blue Badge should be displayed when this happens.</p> <p>It should also be noted that current guidance for Blue Badge holders restricts parking where there is a dropped kerb, which forms a large section of the western footway in the vicinity of Gillian House currently and these dropped kerbs would be retained as part of the proposed scheme.</p> <p>On an experimental basis, the Council will now also introduce an on-street dedicated disabled bay as part of the high street parking bays opposite the surgery.</p>
62	Objection to the merging of the two zebra crossings by Sainsbury's store. The objector suggests that this decision seems to have been taken in order to try and maximise delays for other road users.	Based on site observations the predominant movement between the bus stops is to and from the Sainsbury's store. The existing arrangement of the southbound bus stop and zebra crossings is therefore away from the pedestrian desire line. The proposed bus stop arrangement improves the pedestrian desire line for people travelling between the store and the southbound bus stop.
63	Objection to the installation of traffic signals at the entrance to Sainsbury's store on the	Left hook collisions — where a motor vehicle turning left hits a cyclist — were involved in nine

	grounds that there are no perceived benefits for the majority of road users.	of London's fourteen cycling deaths in 2013. The access to Sainsbury's has a high volume of left turning vehicles as well as HGVs accessing Sainsbury's. The signals have been introduced primarily to remove the left hook conflict but it also provides dedicated time to the Sainsbury's exit to allow vehicles to exit onto the A105.
64	Objection to the lack of formal pedestrian crossing points at the proposed traffic signals at the entrance to Sainsbury's store.	Traffic controlled pedestrian crossings were considered at this junction. However, the modelling assessment showed that the introduction of signalised crossings would have a significant impact on the network resilience and would result in significant queues and delays to general traffic and the bus routes along the corridor. Therefore, based on the need to maintain network resilience pedestrian crossings could not be implemented at this location.
65	Objection to the re-design of the Compton Road junction on the grounds that the removal of the current traffic island is unnecessary and undesirable. Further objection is on the basis that through tightening of the junction, HGV will find the left turn difficult.	The changes at Compton Road offer significant public realm benefits to the area. The tightening of the radius is proposed to reduce the speed of all left turning vehicles into Compton Road, which will increase safety for cyclists. Based on surveys no articulated HGVs undertook the left turn movements in the surveyed periods 7-10am and 4-7pm and only 5 rigid good vehicles undertook the movement. The junction has been designed to accommodate large vehicles turning left, albeit at a slower speed than at present.
66	Objection to the introduction of the seven echelon parking spaces on the south side of Compton road on the grounds that it will be hazardous for drivers to reverse vehicles in and out of these spaces.	The echelon parking bays have been introduced as a result of the public consultation feedback requesting additional parking. The parking bays have been designed based on the guidance in the Traffic Signs Manual, which states <i>'When not at right angles, the bays should be angled so that drivers are required to reverse into them. This is safer than reversing out, when visibility might be restricted by adjacent parked vehicles.'</i> It is acknowledged that not all vehicles will reverse into these bays but approaching vehicle speeds will be low and vehicles which do back out onto the carriageway will do so with caution.
67	Objection to the removal of parking outside of the North London Hospice on the grounds that charitable donations will not be able to be delivered.	Parking is available immediately opposite the North London Hospice. Parking is also available on Compton Road approximately 60m to the south or approximately 50m to the north on the Station Road service road.
68	Objection to the re-alignment of the Triangle on the grounds that it will create difficulties for westbound traffic turning right into Devonshire Road.	The re-alignment of the traffic island at Alderman's Hill will not affect westbound vehicles turning right into Devonshire Road. In both the existing and proposed situation there is a single eastbound lane passing Devonshire Road, which then flares to two lanes on the approach to Green Lanes.
69	Objection to the removal of parking on the west side of Green Lanes between	Parking has been reduced to accommodate the cycle facilities. By locating the parking on one

	Compton Road and Station Road on the grounds of a negative impact for local businesses.	side of the road it enables more parking to be retained. Echelon parking bays have been introduced at Compton Road and parking bays on the Station Road slip road retained following consultation feedback to further mitigate the loss of on-street parking on the west side of Green Lanes between Compton Road and Station Road.
70	Objection to the proposal to install traffic signals at the junction of Station Road / Fords Grove on the grounds that it is unnecessary and does not generate wider benefits other than increase safety for cyclists.	Left hook collisions — where a motor vehicle turning left hits a cyclist — were involved in nine of London's fourteen cycling deaths in 2013. The proposed design looks to retain the left turn slip roads on the northbound and southbound for general traffic to Station Road and Fords Grove respectively. However, to mitigate the risk of left turn hook collisions it has been necessary to signalise the junction. As well as cycle facilities the proposed design introduces a signalised pedestrian crossing on the southern arms which replaces a zebra crossing, to the south and a signalised pedestrian crossing on the western arm, which is currently uncontrolled.
71	Objection to the relocation of the zebra crossing south of Green Dragon Lanes on the grounds that this provides a safe interchange between south bound 329 and west bound 125 buses.	The zebra crossing has been relocated so a safe link can be provided to the Greenway route on Bush Hill, retaining the crossing at its existing location would require cyclists to share a narrow footway with pedestrians, which is not recommended. Should bus passengers alighting the southbound 329, to access the westbound 125 wish to use a formal crossing, then there would also be scope to make the interchange between the Shrubbery Gardens stops which are the stops immediately to the south, where there is a zebra crossing between stops and the walking distance is slightly shorter than the existing interchange at the Green Dragons Lane stops.
72	Objection to the route going along Palmerston Crescent on the grounds that it will have a negative impact on residents.	The proposed route will not result in loss of parking on Palmerston Crescent, cycle logos will however be provided along the road to highlight to all road users that it is a designated cycle route.

### 3.4 Objections based on a technical or procedural matter

#### 3.4.1 These objections are listed in no particular order:

**Table 4**

Ser	Nature of Objection	LBE Response
73	Objection that the draft TMO was published and objections invited whilst this scheme is still subject to a Judicial Review.	An application for judicial review has been dismissed by the High Court. There was no inconsistency between defending the judicial review and consulting on the draft TMO.
74	Objection to the draft TMO which states	Schedule 9, Part 7, para. 12 of the Traffic Signs

	<p>exemptions to vehicles entering the cycle lanes for maintenance / blue badge holders for picking up and setting down passengers – the contention is that the Council does not have the power to make these exemptions and that there is an error in the clause and reference cited.</p>	<p>Regulations &amp; General Directions 2016 enables the introduction of a mandatory with-flow cycle lane without the need for a traffic order. Sub-paragraph 12 (5) provides for a number of exemptions but does not include an exemption for blue badge holders or council maintenance vehicles.</p> <p>The above provisions do not repeal or otherwise constrain the Order making powers contained in the Road Traffic Regulation Act 1984 and the Council is therefore able to make an order to introduce the additional exemptions proposed.</p> <p>The clauses and references cited in the Order have been reviewed and are correct.</p>
75	<p>Objection that both designated disabled parking places and loading bays will be enacted using an Experimental Traffic Order.</p>	<p>Section 9 of the Road Traffic Regulation Act empowers traffic authorities to institute experimental traffic controls lasting not longer than 18 months.</p> <p>The introduction of waiting and loading restrictions and disabled bays on an experimental basis allows changes to be made quickly in the light of feedback and operational experience.</p>
76	<p>Objection to the 24/7 restriction as given in Article 3 of the cycle lanes Traffic Management Order which, in prohibiting entry to the cycle lanes 24 hours a day, seven days a week, serves to prohibit parking and, therefore, any loading/unloading. By so doing this restriction prohibits deliveries to a significant number of businesses and a large number of residents along the A105; prohibits loading and unloading as part of household removals for a large number of residents along the A105; prohibits unloading and delivery of bulk or heavy items to a large number of residents along the A105; and prevents unloading and therefore deliveries by any class of vehicles for more than 30 metres out of 50 metres in many places along the A105. The effect cumulatively is therefore to prohibit the loading or unloading of vehicles of any class in a road on any day of the week at all times as described in paragraph 3 (a) (i) of Regulation 9 of the <i>'Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996'</i>. The Regulations state that in such cases the "order making authority shall cause a public inquiry to be</p>	<p>The proposal includes the same number of loading bays in both Palmers Green and Winchmore Hill town centres as currently exists. Along the residential sections of the A105, loading gaps are proposed at regular intervals. These will be introduced on an experimental basis so that they can be easily modified in the light of feedback and operational experience.</p> <p>At this stage, the Council is not making an order which prohibits the loading or unloading of vehicles:</p> <ul style="list-style-type: none"> <li>• at all times;</li> <li>• before 07.00 hours;</li> <li>• between 10.00 and 16.00 hours; or</li> <li>• after 19.00 hours,</li> </ul> <p>The requirement to hold a public inquiry, as set out in para 9 of the Local Authorities' Traffic Orders (Procedure)(England and Wales) Regulations 1996, cannot therefore apply in this instance.</p>



	<i>held before making an order to which paragraph (3) applies”.</i>	
77	Objection on the grounds of a belief that the traffic modeling report underestimates motor vehicle delays that the scheme will generate. More detail on this objection is at Annex C.	Traffic modelling has been independently audited by the TfL modelling team and approved. As part of the Traffic Management Act Notification an assessment has been carried out assuming 0% reduction in traffic to understand a worst case scenario. However, given the borough wide level of infrastructure and comparing cycle modal share to other outer London boroughs, Enfield feel that the proposed reductions in traffic reported and achievable. It should be noted that the corridor delays reported in the traffic modelling report are based on 0% reduction.
78	Objection on the grounds that the designs for the scheme do not meet the London Cycling Design standards. More detail on this objection is at Annex D.	The designs have been developed in close partnership with the TfL cycle team who wrote the London Cycle Design Standards, with bus boarders shown in the standards.
79	Objection on the grounds that LBE intends to revoke and introduce various Loading Bays. However, the relevant draft traffic annexed to the Notice omits the introduction of two loading bays indicated on the plans page 12. These are outside 267 -269 Green lanes N13 and outside 196 - 198. The omission of this from the relevant schedule invalidates the entire Notice published by LBE, which should now re-advertise it. Furthermore, it is difficult to see how these two loading bays will be implemented, due to the frequency of crossovers at this locations and in respect of the loading bay on the southbound side of the road, the proximity to the controlled junction (Oakthorpe Road/Broomfield Lane)	<p>All of the good vehicle loading bays specified in the schedule to the draft order are shown in yellow on the plans. Additional loading areas such are those in the vicinity of 267-269 and 166-196 Green Lanes (and elsewhere along the residential sections of the route) will be introduced experimentally pursuant to Section 9 of the Road Traffic Regulation Act 1984.</p> <p>These loading areas will be defined by introducing:</p> <ul style="list-style-type: none"> <li>• a section of advisory cycle lane;</li> <li>• a section of double yellow line at the kerbside to prevent parking (except for blue badge holders for up to three hours);</li> <li>• a loading restriction that prevents loading and unloading during peak periods.</li> </ul> <p>The position of the loading areas will take account the location of crossovers and the proximity to junctions.</p>
80	Objection that the air quality report findings are flawed because they are based on an earlier inaccurate data within the traffic modelling report.	There has been considerable traffic modelling throughout the development of the scheme and the Council are content that the data generated from this process is fit for purpose for use in the air quality impact assessment.
81	Objection to a series of loading bays in residential areas on the grounds that they have not been subject to any previous consultation and that the specific length of these loading bays are not defined.	The introduction of these loading bays are in response to previous consultation feedback and demonstrate how the design has continued to evolve in response to previous feedback. These loading bays will be introduced on an experimental basis so that they can be easily modified in the light of feedback and operational experience.
82	Objection that there is no assurance that the scheme will be delivered on budget.	The A105 scheme is subject to strict change control and governance processes and monthly progress meetings are held with TfL to review the cost plan, programme, and risk register.

		Information from these meetings is reported to the Mini Holland Board.
83	Objection to the proposal that Enfield Council will offer free dropped kerbs for those people wishing to park their cars on their property on the grounds that this is environmentally unfriendly.	This proposal is intended to mitigate the impact of reduced residential parking along the A105. There are a range of ways in which residents could provide parking on their own property which can be achieved without excessive environmental impact.
84	Objection to the lack of a proper consultation as the scheme and its implications have not been properly explained to residents and businesses.	The engagement and consultation for this scheme has been extensive and way beyond the statutory minimum required. It has consisted of a series of public exhibitions for businesses and residents. The details of the proposals have been available for review and over the last 18 months there has been extensive publicity regarding the ongoing engagement and consultation. As a direct result of the consultation, a range of changes have been made to the design of this scheme.

**Annexes:**


- A – Campaign leaflet promoting objection responses to the A105 Statutory Consultation.
- B – Generic letter templates from businesses.
- C – FERRA survey of delays objection detail.
- D – London Cycling Design Standards objection detail.

## Annex A – Local Campaign Group Leaflet

**GREEN LANES**  
ENFIELD TOWN TO PALMERS GREEN  
*It's where we live, work and shop!*

July 2016


## How to object to The A105 Cycle Lane Statutory Consultation



Enfield Council are proposing to devote around a third of the road width from Enfield Town to Palmers Green Library for the exclusive use of cyclists 24/7.

**Have you read the A105 statutory consultation leaflet yet?**

Only objections that relate to the draft traffic management orders will be considered by the London Borough of Enfield.



The Council's leaflet does not give you the full picture.

Please read this leaflet to find out:  
**Why** you should object  
**How** you should object

**You ONLY have until JULY 28th to make your views known**

## What you should object to

Here is a list of suggested objections to the draft traffic management order:

**OBJECT TO** the proposal to install continuous cycle lanes along the kerb, from Enfield Town to Palmers Green on both sides of the road.

**OBJECT TO** the potentially massive increase in congestion which will result if you force all vehicles to share a **single** lane.

**OBJECT TO** the effect on response times for emergency services including fire tenders and ambulances.

**OBJECT TO** the proposed bus stops which would put passengers (and cyclists) at risk as they have to cross the cycle lane to get on and off a bus.

**OBJECT TO** parking and delivery bays being located **OUTSIDE** of the cycle lanes. There have been many accidents in places where similar cycle lanes are already installed.

**OBJECT TO** the massive loss of on-street parking which will be highly restrictive for residents and businesses. In addition, there will be other restrictions such as: no skips, no deliveries, and no visitor parking.

**OBJECT TO** preventing Blue Badge holders from parking along the entire length of the cycle lane route. **Enfield will be the first Outer London Borough to remove the Blue Badge scheme from its shopping areas.**

**OBJECT TO** the potential loss of local businesses, such as: restaurants, take-aways, charity shops, hairdressers etc. which provide important services and jobs for the community.

**OBJECT TO** the lack of proper consultation, as the scheme and its implications have not been properly explained to residents and businesses.

**Why is Enfield Council putting residents lives AT RISK?  
PLEASE OBJECT TODAY and quote reference TG-52-1314**

## How to object

Objections can be made both online or in writing and must state clearly the grounds on which the objections are being made.

**QUOTE REFERENCE TG-52-1314**

**Online:**

[www.consultations.cycleenfield.co.uk/traffic-and-transportation/a105-statutory-consultation](http://www.consultations.cycleenfield.co.uk/traffic-and-transportation/a105-statutory-consultation)

**Q6** What is the specific location to which your objection refers?

Answer this question by saying

"The whole of the A105 cycle lane scheme from Enfield Town to Palmers Green"

**Q7** Please describe the nature of your objection? (Required)

Answer using the list opposite.

**In writing to:**

The Head of Traffic & Transport  
 Enfield Council, Civic Centre, Silver Street  
 Enfield EN1 3XD

**QUOTE REFERENCE TG-52-1314**

**YOU MUST STATE YOUR GROUNDS FOR OBJECTION**

## Unsafe Uneconomic Undemocratic

### Impact assessments

Enfield Council has been economical with the truth about the traffic modelling, economic impact and air quality reports they commissioned.

This scheme will do nothing to improve local prosperity, local bus services or air quality.

[www.cycleenfield.co.uk/A105](http://www.cycleenfield.co.uk/A105)



Source: <http://cycleenfield.co.uk/bus-stops>

### Support SOGL

[www.saveourgreenlanes.co.uk](http://www.saveourgreenlanes.co.uk)

[facebook.com/savegreenerlanes](https://www.facebook.com/savegreenerlanes)

[@SaveGreenLanes](https://www.instagram.com/savegreenerlanes)

[savegreenerlanes@gmail.com](mailto:savegreenerlanes@gmail.com)

07484 780516

### Donate:

Please send cheques to:  
 SOGL  
 C/O 29 Broomfield Avenue  
 London N13 4JL

Or pay direct into our bank account  
 Account name: Save Our Green Lanes  
 Bank sort code: 20-25-19 (Barclays)  
 Bank account number: 30928275

**The A105 scheme is putting your way of life AT RISK  
PLEASE OBJECT BY FRIDAY JULY 28th**

**Annex B – Generic Letters Received from Businesses**

(24)

London Borough of Enfield  
Civic Centre,  
Silver Street,  
ENFIELD, MIDDLESEX EN1 3XD

Date 25<sup>th</sup> July, 2016

Dear Sirs,

**CYCLE ENFIELD – REF NO: TG-52-1314**

I refer to the above scheme and I am very concerned about its negative impact on our business.

Removal of quite a lot of parking spaces along Green Lanes would be detrimental to our business, other retailers and service providers such as hairdressers, charity shops, take-aways and restaurants.

Also, the scheme prevents Blue Badge holders from parking along the entire length of this scheme. This means London Borough of Enfield will remove the Blue Badge scheme from its shopping areas.

I, therefore, object to this proposal.

Yours faithfully,

(16)

28th July 2016

David Taylor  
Head of Traffic & Transportation  
Enfield Council  
Civic Centre  
Silver Street  
Enfield EN1 3XD

Dear Mr Taylor

**OBJECTION TO TRAFFIC ORDER REF TG/52/1314**

I am writing to object to the A105 cycle scheme and the impact it would have on my business on Winchmore Hill Broadway, as well as others on this shopping parade.

The letter Enfield Council sent to local businesses last week did not give clear information about the substantial reduction in the amount of car parking spaces on The Broadway that would occur if these proposals were to be implemented.

This letter also did not give any information about how long The Broadway would have to be closed for business during the building of these unnecessary and unwanted cycle lanes.

I do not understand how the proposed changes would be any help to Winchmore Hill Broadway or Winchmore Hill in general. In fact the proposed narrowing of Green Lanes would result in there being long traffic jams for most of the day - which would not be progress.

The proposed removal of the small traffic island, near the junction with Compton Road, and its replacement by a zebra crossing, near Holy Trinity Church, would mean that people would no longer have a safe place to cross this busy road where they need and want it.

I strongly object to the proposal to build of these cycle lanes, not just in Winchmore Hill but along the whole way from Palmers Green up to Enfield Town.

I wish to register my disgust with the way that long standing local businesses are being treated by Enfield Council.

Yours sincerely

(25)

London Borough of Enfield  
Civic Centre,  
Silver Street,  
ENFIELD, MIDDLESEX EN1 3XD

Date 25<sup>th</sup> July, 2016

Dear Sirs,

**CYCLE ENFIELD – REF NO: TG-52-1314**

We write to object to this proposal in Palmers Green Town Centre. We rely on our customers visiting our shop and other businesses by parking their cars for a short period and doing their shopping. This scheme means massive loss of on street parking hence driving our customers elsewhere.

It seems that there has not been proper consultation regarding this proposal with residents and businesses along A105.

Yours sincerely,

(33)

London Borough of Enfield  
Civic Centre,  
Silver Street,  
ENFIELD, MIDDLESEX EN1 3XD

Date 25<sup>th</sup> July, 2016

Dear Sirs,

**CYCLE ENFIELD – REF NO: TG-52-1314**

We object to this proposal on the following grounds:

1. Removal of a lot of parking spaces along Green Lanes in Palmers Green which will be hugely restrictive for both the residents and businesses. It will also mean restricting deliveries which is extremely vital for a lot of businesses.
2. This would lead to increase in congestion which would effect response times for emergency services such as fire engines, police and ambulances.
3. There is lack of proper consultation, as the scheme and its implications have not been properly explained to the businesses along the route.

We urge the Council to reconsider this scheme and think of running cycle lane away from the high streets.

Yours faithfully,

### Annex C – FERAA survey of delays (objection responded to at Table 4, Ser 77)

**Objection** to the massive undercalculation of the delays and congestion likely to be caused by the proposed “bus boarders” introduction of which would mean that all traffic, which would have to use a single lane in each direction, would be delayed by stationary buses. These vehicles would obviously be unable to overtake the stationary bus at most times of day, because of the volume of traffic flowing in the opposite direction.

L.B. Enfield’s consulting engineers have predicted that these changes would not result in any significant traffic delays. To test this hypothesis the Federation of Enfield Residents and Allied Associations (FERAA) arranged for a member of the Chartered Institution of Highways and Transportation to carry out a survey of the delays that would be caused to northbound vehicles, at the bus stop on Green Lanes at the junction with Compton Road. This survey was conducted on Friday 20 November 2015 during the evening peak period (1700 - 1800) on a typical weekday during school term time.

The results showed that during this hour eight northbound buses stopped at this bus stop and the average dwell time was 21 seconds. Consequently the total amount of time, during this hour, when it would have been impossible for other northbound vehicles to overtake a stationary bus was 2 minutes 48 seconds (4.6% of the hour). This effect would be exacerbated with further stop-start queuing and also at bus stops with high usage (for example, near schools). On any view, **this is not** a “negligible delay” as claimed by LBE and its consulting engineers. Given there is strong evidence that Jacobs, L.B. Enfield’s consulting engineers, have grossly underestimated the likely delays that would be imposed on other traffic by buses stopping in the traffic lanes and by the removal of right turn pockets; and that the estimates calculated of the impact on air quality (produced for L.B. Enfield by CERC) were based on these traffic estimates provided by Jacobs it is evident that these significant underestimates of likely delays have clear implications for the subsequent calculations of air quality. L. B. Enfield did not attempt to verify either set of data and has not asked its consultants to update their calculations of impact of the proposals on air quality to take these more accurate data into account.

There is therefore an **object** to the proposals because, contrary to the claims made by LBE based on use of the erroneous estimates made by Jacobs, **the impact on air quality will not be positive but negative.**

### Annex D – London Cycling Design Standards (objection responded to at Table 4, Ser 78)

Objection to the fact that the plans – contrary to the claims made by Cllr Daniel Anderson during the call-in meeting - **do not comply** with the London Cycling Design Standards, which require that “all infrastructure delivered through TfL-funded programmes [apply] the [Guiding principles].” L.B. Enfield’s proposals are mostly funded by Transport for London, so it would be expected that these principles would be followed. The third of these principles is:

*“Cycles must be treated as vehicles, not as pedestrians.....Cyclists and pedestrians should not be forced together where there is space to keep them apart, creating unnecessary conflict which can only increase as the number of cyclists rises. We have a strong preference against schemes requiring cyclists and pedestrians to share the same highway space, where they can be avoided. ...”*

The fourth principle is relevant to the proposed “bus boarder” arrangements:

*“Most main roads in London, are, however, also bus stops with frequent stops. The cycle lane would have to go between the bus and the pavement. Everybody getting off or on a bus would have to step straight into the safety concerns both for bus passengers and cyclists.”*

For this reason TfL caution against the use of bus boarder arrangements on busy main roads. L.B.E’s designs do not appear to comply with these design standards. The above points were made in the Stage 1 Safety Audit yet LBE and its consulting engineers chose to reject them. Given the plans now have significant points that are at odds with accepted safety practice relating to pedestrians and passengers they clearly pose a significant risk to these groups.

## **Appendix C – Traffic Orders and Feature to be Implemented**

### **Schedule 1 - Orders to be made without modification**

- a) Enfield (Cycle Lanes) No. 1 Order 20\*\*,
- b) Enfield (Parking Places) (Pay and Display) (No. \*) Order 20\*\*
- c) Enfield (Goods Vehicles Loading Bays) (No. \*) Order 20\*\*
- d) Enfield (Prohibition of stopping on Cab Ranks) (Special Parking Area) Traffic Order 20\*\*
- e) Enfield (Residents' Parking Places) (Enfield Town) (No. \*) Order 20\*\*,
- f) Enfield (Residents' and Shared Use Parking Places) (Queens Avenue) (No. \*) Order 20\*\*
- g) Enfield (Bus Lanes) (No. \*) Traffic Order 20\*\*
- h) Enfield (Prescribed Routes) (No. \*\*) Traffic Order 20\*\*
- i) Enfield (Prescribed Route) (No. \*\*) Traffic Order 20\*\*

### **Schedule 2 - Order to be made with modification**

- a) Enfield (Free Parking Places) (No. \*) Order 20\*\*

Proposed modification: Removal of the restriction on free parking places in residential areas limiting the length of stay to a maximum of two hours.

### **Schedule 3 – Traffic Calming Features to be introduced**

All features specified in schedules 1, 2 and 3 of the notice included as Appendix D.

### **Schedule 4 – Zebra Crossings to be Introduced**

- a) outside No. 436 Green Lanes N13
- b) outside No. 1 to No. 6 Crestbrook Place, Green Lanes N13
- c) outside 10 to 20 Stefan House, Green Lanes N21,
- d) outside No. 701 to No. 713 (Compton Lodge), Green Lanes N21
- e) outside No. 140 and No. 142 Park Avenue EN1
- f) outside No. 105 London Road EN2.

The associated zig-zag markings would be placed adjacent to the crossing and between the points specified in Schedule 4 of the notice included as Appendix D.

### **Schedule 5 – Tiger Crossings to be Introduced**

- a) outside No. 239 Green Lanes N13
- b) outside No. 604 Green Lanes N13

- c) outside No. 792 Green Lanes N21
- d) outside No. 824, No. 826 and No. 828 Green Lanes N21
- e) outside No. 944, No. 946 and No. 948 Green Lanes N21
- f) outside No. 123 Park Avenue EN1
- g) outside No. 79 London Road EN2

The associated zig-zag markings would be placed adjacent to the crossing and between the points specified in Schedule 5 of the notice included as Appendix D.

**Schedule 6 – Disabled Persons' Parking Bays to be Introduced Experimentally**

Disabled Persons' Parking Bays at least in the following general areas:

- a) London Road, south of Roseneath Walk
- b) Village Road (not A105) by St Stephen's Church
- c) A105 near to Vicars Moor Lane junction
- d) A105 close to Shrubbery Gardens junction, by Post Office
- e) Station Road near to its junction with Green Lanes
- f) Compton Road near to junction with The Broadway
- g) A105 near to Woodberry Avenue (day time only)
- h) A105 near to Gillian House Surgery
- i) Hazelwood Lane, near to Green Lanes
- j) Lodge Drive, near to Green Lanes

GREEN LANES N13/N21, RIDGE AVENUE N21, VILLAGE ROAD EN1, PARK AVENUE EN1 AND LONDON ROAD EN2 - TRAFFIC ORDERS ASSOCIATED WITH THE INTRODUCTION OF CYCLE LANES BETWEEN ECCLESBOURNE GARDENS N13 AND CECIL ROAD EN2.

GREEN LANES N13/N21, RIDGE AVENUE N21, VILLAGE ROAD EN1, PARK AVENUE EN1, GREEN DRAGON LANE N21 AND AVENUE PARADE RIDGE AVENUE N21 - REVOCATION AND INTRODUCTION OF FREE PARKING PLACES INCLUDING A ZONAL RESTRICTION BETWEEN SHRUBBERY GARDENS N21 AND ELSIEDENE ROAD N21.

GREEN LANES N13/N21, LODGE DRIVE N13, HAZELWOOD LANE N13, STATION ROAD N21, FORDS GROVE N21, COMPTON ROAD N21, WINDSOR ROAD N13 AND LONDON ROAD EN2 - REVOCATION AND INTRODUCTION OF PAY AND DISPLAY PARKING PLACES.

GREEN LANES N13/N21, FOX LANE N13 AND ALDERMANS HILL N13 - REVOCATION AND INTRODUCTION OF GOODS VEHICLES LOADING BAYS.

GREEN LANES N21 AT ITS JUNCTION WITH STATION ROAD N21 AND FORDS GROVE N21, GREEN LANES N13/N21 AT ITS JUNCTION WITH THE SLIP ROAD TO HEDGE LANE N13 AND AVENUE PARADE RIDGE AVENUE N21 AT ITS JUNCTION WITH BUSH HILL ROAD N21, THE ROADS LINKING COMPTON ROAD N21 TO GREEN LANES N13, THE ROAD LINKING VICARS MOOR LANE N21 TO GREEN LANES N21 AND THE SOUTHERN END OF THE SERVICE ROAD IN LONDON ROAD EN2 AT ITS JUNCTION WITH LINCOLN ROAD EN1 - INTRODUCTION OF PRESCRIBED ROUTES.

DEVONSHIRE ROAD N13 - INTRODUCTION OF PRESCRIBED ROUTE OVER ITS ENTIRE LENGTH.

LODGE DRIVE N21 AND ALDERMANS HILL N13 - REVOCATION OF EXISTING TAXI RANK ON LODGE DRIVE N21 AND EXTENSION OF EXISTING TAXI RANK ON ALDERMANS HILL N13.

GREEN LANES N13/N21, PARK AVENUE EN1, LONDON ROAD EN2 - REMOVAL AND INTRODUCTION OF CONTROLLED PEDESTRIAN CROSSINGS AT VARIOUS LOCATIONS BETWEEN ECCLESBOURNE GARDENS N13 AND CECIL ROAD EN2.

GREEN LANES N13/N21, RIDGE AVENUE N21, PARK AVENUE EN1, LONDON ROAD EN2, DEVONSHIRE ROAD N13, HAZELWOOD LANE N13, WINDSOR ROAD N13, OSBORNE ROAD N13, QUEENS AVENUE N21, COMPTON ROAD N21, FOX LANE N13, PARK AVENUE N13, MEADOWCROFT ROAD N13, EATON PARK ROAD N13, SHERBROOK GARDENS N21, DEVONSHIRE GARDENS N21, VICARS MOOR LANE N21 AND BERKELEY GARDENS N21 - INTRODUCTION OF SPEED TABLES, RAISED JUNCTIONS AND ENTRY TREATMENTS.

PARK CRESCENT EN2, VILLAGE ROAD EN1, LINCOLN ROAD EN1 AND LONDON ROAD EN2 - REVOCATION AND INTRODUCTION OF RESIDENTS PARKING PLACES WITHIN THE ENFIELD TOWN CPZ AREA.



**QUEENS AVENUE N21 - REVOCATION AND INTRODUCTION OF RESIDENTS PARKING PLACES WITHIN THE QUEENS AVENUE CPZ AREA.**

**GREEN LANES N13 - REVOCATION AND INTRODUCTION OF BUS LANE.**

Further information may be obtained from Traffic and Transportation, telephone number 020 8379 4830

**1. NOTICE IS HEREBY GIVEN** that the Council of the London Borough of Enfield (the Council) propose to make the Enfield (Cycle Lanes) No. 1 Order 20\*\*, the Enfield (Free Parking Places) (No. \*) Order 20\*\*, the Enfield (Parking Places) (Pay and Display) (No. \*) Order 20\*\*, the Enfield (Goods Vehicles Loading Bays) (No. \*) Order 20\*\*, The Enfield (Prohibition of stopping on Cab Ranks) (Special Parking Area) Traffic Order 20\*\*, The Enfield (Residents' Parking Places) (Enfield Town) (No. \*) Order 20\*\*, The Enfield (Residents' and Shared Use Parking Places) (Queens Avenue) (No. \*) Order 20\*\*, The Enfield (Bus Lanes) (No. \*) Traffic Order 20\*\*, The Enfield (Prescribed Routes) (No. \*\*) Traffic Order 20\*\* and The Enfield (Prescribed Route) (No. \*\*) Traffic Order 20\*\* under sections 6, 45, 46, 49, 51 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, Section 8 of the and Part I of Schedule 5 to the Local Government Act and Schedule 9 to the Traffic Signs Regulations and General Direction 2016.

**2.** The general effect of the Orders would be to:

- (a) introduce a mandatory cycle lane Order to amend Item (5) of paragraph 12 in Part 7 of the Traffic Signs Regulations and General Directions 2016 to include in the list of purposes
  - (i) Council maintenance vehicles (or approved contractors), performing maintenance along the route; and
  - (ii) Blue Badge holders, for the purpose of picking up and setting down passengers.
- (b) revoke and introduce Free Parking Places in parts of the streets specified in the second paragraph of the heading to this Notice, and a restriction between Shrubbery Gardens N21 and Elsievene Road N21 that prevents vehicles from returning to a free parking place within the same zone within 4 hours;
- (c) revoke and introduce Pay and Display Parking Places in parts of the streets specified in the third paragraph of the heading to this Notice;
- (d) revoke and introduce Goods Vehicles Loading Places in parts of the streets specified in the fourth paragraph of the heading to this Notice;

- (e) introduce prescribed routes in the streets specified in the fifth paragraph of the heading to this Notice, as follows:
  - (i) northbound vehicles in Green Lanes N21 would be prevented from turning left into Station Road N21;
  - (ii) southbound vehicles in Green Lanes N21 would be prevented from turning left into Ford's Grove N21;
  - (iii) south-westbound vehicles in Green Lanes N13 would be prevented from turning left into the slip road at its junction with Hedge Lane N13;
  - (iv) one way traffic in a north-easterly direction in Avenue Parade Ridge Avenue N21;
  - (v) closure of the roads linking Compton Road N21 with Green Lanes N13;
  - (vi) closure of the road linking Green Lanes N21 with Vicars Moor Lane N21
  - (vii) closure of the service road in London Road EN2 at its junction with Lincoln Road EN1.
  
- (f) introduce prescribed route in the street specified in the sixth paragraph of the heading to this Notice, as follows: Contra-flow Cycle Lane for the entire length of Devonshire Road N13
  
- (g) revoke and introduce Cab Ranks in the streets specified in the seventh paragraph of the heading to this Notice;
  
- (h) revoke and introduce Residents Parking Places as part of the Enfield Town Controlled Parking Zone in parts of the streets specified in the tenth paragraph of the heading to this Notice;
  
- (i) revoke and introduce Residents Parking Places as part of the Queens Avenue Controlled Parking Zone in part of the street specified in the eleventh paragraph of the heading to this Notice, and;
  
- (j) revoke and introduce a Bus Lane in part of the street specified in the final paragraph of the heading to this Notice.

**3. FURTHER NOTICE IS HEREBY GIVEN** that in order to control the speed of traffic, the Council propose to construct under sections 90A to 90I of the Highways Act 1980 -

- (a) raised entry treatments (flat top design road hump) which would be constructed at a maximum height of 75mm above carriageway level and cover the full width of

the road at each junction location specified in Schedule 1 to this Notice;

- (b) flat top speed tables which would be constructed at the locations specified in Schedule 2 to this Notice; and
- (c) raised junctions which would be constructed at a maximum height of 75mm above the carriageway level and cover the full width of the roads at the locations specified in Schedule 3 to this Notice.

**4. FURTHER NOTICE IS HEREBY GIVEN** that the Council has approved, under section 23 of the Road Traffic Regulation Act 1984, the provision of new zebra crossings in the following locations. Green Lanes N13/N21, outside No. 436 Green Lanes N13, outside No. 1 to No. 6 Crestbrook Place; Green Lanes N13, outside 10 to 20 Stefan House; Green Lanes N21, outside No. 701 to No. 713 (Compton Lodge) Green Lanes N21: Park Avenue EN1, outside No. 140 and No. 142 Park Avenue EN1: London Road EN2, outside No. 105 London Road EN2. The associated zig-zag markings would be placed adjacent to the crossing and between the points specified in Schedule 4 to this Notice and would prohibit all vehicles from stopping on them at all times.

**5. FURTHER NOTICE IS HEREBY GIVEN** that the Council has approved, under section 23 of the Road Traffic Regulation Act 1984, the provision of new tiger crossings (a crossing where traffic should give way to pedestrians and cyclists) in the following locations: Green Lanes N13/N21, outside No. 239 Green Lanes N13, outside No. 604 Green Lanes N13, outside No. 792 Green Lanes N21, outside No. 824, No. 826 and No. 828 Green Lanes N21, outside No. 944, No. 946 and No. 948 Green Lanes N21, outside No. 123 Park Avenue EN1, outside No. 79 London Road EN2. The associated zig-zag markings would be placed adjacent to the crossing and between the points specified in Schedule 5 to this Notice and would prohibit all vehicles from stopping on them at all times.

**6. FURTHER NOTICE IS HEREBY GIVEN** that the Council of the London Borough of Enfield (the Council) propose to convert the footway into shared-use cycle tracks using powers under sections 65(1) and 166(4) of the Highways Act 1980 in parts of the following streets: Green Lanes N13/N21, Ridge Avenue N21, Village Road EN1, Park Avenue EN1 and London Road EN2.

7. A copy of each of the proposed Orders, a map indicating the locations and effects of the proposed Orders, the zebra and tiger crossings and associated zig-zag markings, of the Council's statement of reasons for proposing to make the Orders and any other relevant documents can be inspected at the Reception Desk, the Civic Centre, Silver Street, Enfield, Middlesex, EN1 3XD during normal office hours on Mondays to

Fridays inclusive.

8. Any person desiring to object to the proposed Orders, or make any other representations in respect of them or the zebra and tiger crossings (including the zig-zag markings) should send a statement in writing to that effect, and in the case of an objection stating the grounds thereof, to the Head of Traffic and Transportation, the Civic Centre, Silver Street, Enfield, Middlesex, EN1 3XD, quoting the reference TG52/1314, by 29<sup>th</sup> July 2016 or by visiting cycle enfield at [www.cycleenfield.co.uk/A105](http://www.cycleenfield.co.uk/A105)

9. Under the Local Government (Access to Information) Act 1985, any letter you write to the Council in response to this Notice may, upon written request, be made available to the press and to the public, who would be entitled to take copies of it if they so wished.

Dated 6<sup>th</sup> July 2016

David B. Taylor  
Head of Traffic and Transportation

**Note** - Waiting & loading restrictions and designated disabled persons parking places will be introduced on an experimental basis as part of separate proposals at various locations in Green Lanes N13/N21, Ridge Avenue N21, Village Road EN1, Park Avenue EN1 And London Road EN2 (between Ecclesbourne Gardens and Cecil Road).

**SCHEDULE 1**  
**(Raised entry treatment location)**

**Devonshire Road N13**, from a point 3.5 metres North-West of the South-Eastern boundary of No. 399 Green Lanes N13, for a distance of 11.5 metres in a South-Easterly direction along Devonshire Road N13.

**Hazlewood Lane N13**, from a point 1.0 metre South-East of the Northern boundary of No. 346 Green Lanes N13, for a distance of 10.0 metres in a North-Westerly direction along Hazlewood Lane N13.

**Fox Lane N13**, from the North-Western kerb-line of Green Lanes N13, for a distance of 10.5 metres in a North-Westerly direction along Fox Lane N13.

**Park Avenue N13**, from the eastern kerb-line of Green Lanes N13, for a distance of 9.5 metres in an Easterly direction along Park Avenue N13.

**Windsor Road N13**, from a point 8.0 metres South-East of the Northern boundary of No. 402 Green Lanes N13, for a distance of 14.5 metres in a North-Westerly direction along Windsor Road N13.

**Osborne Road N13**, from a point 5.0 metres South-East of the Northern boundary of No. 444 Green Lanes N13, for a distance of 12.0 metres in a North-Westerly direction along Osborne Road N13.

**Meadowcroft Road N13**, from the North-Western kerb-line of Green Lanes N13, for a distance of 15.5 metres in a North-Westerly direction along Meadowcroft Road N13.

**Eaton Park Road N13**, from the North-Western kerb-line of Green Lanes N13, for a distance of 11.0 metres in a North-Westerly direction along Eaton Park Road N13

**Queens Avenue N21**, from a point 1.0 metre South-West of the Southern boundary of No. 736 Green Lanes N21, for a distance of 8.5 metres in a North-Westerly direction along Queens Avenue N21.

**Compton Road N21**, from a point 36.0 metres South-West of the Northern boundary of No. 735 Green Lanes N21, for a distance of 12.0 metres in a North-Westerly direction along Compton Road N21.

**Vicars Moor Lane N21**, from the North-Western kerb-line of Green Lanes N21 for a distance of 24.5 metres in a North-Westerly direction along Vicars Moor Lane N21

**Sherbrook Gardens N21**, from the Northern kerb-line of Green Lanes N21, for a distance of 11.5 metres in a Northerly direction along Sherbrook Gardens N21.

**Devonshire Gardens N21**, from the Northern kerb-line of Ridge Avenue N21, for a distance of 13.5 metres in a Northerly direction along Devonshire Gardens N21.

**SCHEDULE 2**  
**(Speed table locations)**

**Green Lanes N21**, from a point 1.0 metres South of the Southern boundary of No. 759 Green Lanes N21, for a distance of 22.0 metres in a Northerly direction along slip road leading to Station Road N21.

**Green Lanes N21**, from a point 5.0 metres North of the Southern boundary of No. 792 Green Lanes N21, for a distance of 23.0 metres in a Northerly direction along slip road leading to Fords Grove N21.

**Berkeley Gardens N21**, from a point 2.5 metres North-West of the North-Western kerb-line of Ridge Avenue N21 for a distance of 12.0 metres in a North-Westerly direction along Berkeley Gardens N21 and from the South-Western kerb-line of Berkeley Gardens N21 for a distance of 11.5 metres in a North-Easterly direction along Avenue Parade Ridge Avenue N21.

**London Road EN2**, from a point 11.0 metres North of the common boundary of No. 57 and 59 London Road EN2 for a distance of 9.0 metres in an Easterly direction along the service road access to Roseneath Walk EN2.

**SCHEDULE 3**  
**(Raised junction locations)**

**Green Lanes N13**, from a point 3.5 metres North of the Southern boundary of No. 150 Green Lanes N13 for a distance of 26.5 metres in a Northerly direction and from the Eastern kerb-line of Green Lanes for the distance of 22.0 metres in a Westerly direction along Palmerston Crescent N13.

**Green Lanes N13**, from the common boundary of No. 244 and No. 246 Green Lanes N13 for a distance of 45.0 metres in a North-Easterly direction and from the North-Western kerb-line of Green Lanes for a distance of 17.5 metres in a North-Westerly

direction along the Southern arm of Alderman's Hill N13 and 14.0 metres along the Northern arm of Alderman's Hill N13.

**Green Lanes N13**, from the a point 11.0 metres North-East of the common boundary of No. 282 and No. 284 Green Lanes N13 for a distance of 36.0 metres in a North-Easterly direction and from the North-Western kerb-line of Green Lanes for a distance of 28.0 metres in a South-Easterly direction along Lodge Drive N13.

**Green Lanes N13**, from a point 10.0 metres North of the common boundary of No. 613 and No. 615 Green Lanes N13, for a distance of 54.5 metres in a Northerly direction, from the Western kerb-line of Green Lanes N13 for a distance of 18.0 metres in a Easterly direction along Barrowell Green N13 and from the Eastern kerb-line of Green Lanes N13 for a distance of 18.5 metres in a Westerly direction along Woodberry Avenue N13.

**Green Lanes N21**, from a point 2.0 metres North-East of the North-Eastern corner of No.1 Fernleigh Road N21 for a distance of 19.5 metres in a North-Easterly direction and from the South-Eastern kerb-line of Green Lanes N21 for a distance of 17.5 metres in a North-Westerly direction along Fernleigh Road N21.

**Green Lanes N21**, from a point 5.0 metres North of the common boundary of No. 822 and No. 824 Green Lanes N21 for a distance of 27.5 metres in a Northerly direction and from the Eastern kerb-line of Green Lanes N21 for a distance of 16.0 metres in a Westerly direction along Shrubbery Gardens N21.

**Green Lanes N21**, from a point 7.5 metres North of the common boundary of No. 936 and No. 938 Green Lanes N21 for a distance of 48.1 metres in a North-Easterly direction and from the South-Western kerb-line of Green Lanes N21 for a distance of 14.5 metres in a North-Westerly direction along Green Dragon Lane N21.

**Ridge Avenue N21**, from a point 61.0 metres North-East of the common boundary of No. 92 and No. 94 Ridge Avenue N21 for a distance of 38.5 metres in a North-Easterly direction along Ridge Avenue N21 and from a point 5.6 metres North of the common boundary of No. 8 and No. 10 Church Street N9 for a distance of 42.0 metres in a Northerly direction along Church Street N9 and Bush Hill Road N21.

**Park Avenue EN1**, from a point 11.5 metres West of the Northern most boundary of No. 56 Village Road EN1 for a distance of 24.0 metres in an Easterly direction along Park Avenue EN1 and from the Northern kerb-line of Park Avenue EN1 for a distance

of 12.5 metres in a Northerly direction along Village Road EN1.

**Park Avenue EN1**, from the common boundary of No. 160 and No. 158 for a distance of 69.5 metres in a North-Easterly direction along Park Avenue EN1 and from the Western kerb-line on Park Avenue EN1 for a distance of 16.0 metres in a South-Westerly direction along Bush Hill N21 and from the North-Western kerb-line of Park Avenue EN1 for a distance of 10.0 metres in a North-Westerly direction along Uvedale Road EN2.

**London Road EN2**, from a point 5.5 metres North-East of the common boundary of No. 81 and No. 83 London Road EN2 for a distance of 63.5 metres in a Northerly direction along London Road EN2 and from the Eastern kerb-line of London Road EN2 for a distance of 10.5 metres in a South-Easterly direction along Village Road EN1 and from the Western kerb-line of London Road for a distance of 10.0 metres in an Easterly direction along Lincoln Road EN1.

#### **SCHEDULE 4**

#### **(Length of zig-zag markings relating to the new zebra crossings)**

**GREEN LANES N13**, Both Sides, from the common boundary of No. 428 and No. 430 Green Lanes N13 for a distance of 43.5 metres in a North-Easterly direction.

**GREEN LANES N13**, Both Sides, from the North-East kerb-line of Oaktree Avenue N13 for a distance of 30.5 metres in a North-Easterly direction.

**GREEN LANES N21**, Both Sides, from a point 62.5 metres North of the Northern kerb-line of Carpenter Gardens N21 for a distance of 32.0 metres in a Northerly direction.

**GREEN LANES N21**, Both Sides, from a point 3.0 metres North of the Southern boundary of No. 699 Green Lanes N21, for a distance of 41.0 metres in a Northerly direction.

**PARK AVENUE EN1**, Both Sides, from a point 12.5 metres North of the common boundary of Nos. 136 and 138 Park Avenue EN1 for a distance 34.5 metres in a northerly direction

**LONDON ROAD EN2**, Both Sides, from a point 24.5 metres North-East of the North-Eastern kerb-line of Castleigh Court EN2 for a distance of 39.0 metres in a North-Easterly direction.

**LONDON ROAD EN2**, Both Sides, from a point 25.0 metres North of the Northern kerb-line of Lincoln Road EN1 for a distance of 38.5 metres in a Northerly direction.



**SCHEDULE 5**  
**(Length of zig-zag markings relating to the new tiger crossings)**

**GREEN LANES N13**, Both Sides, from a point 11.0 metres North of the Northern boundary of No. 217 Green Lanes N13 for a distance of 40.5 metres in a Northerly direction.

**GREEN LANES N13**, Both Sides, from a point 10.5 metres North-East of the common boundary of No. 594 and No. 596 Green Lanes N13 for a distance of 51.0 metres in a North-Easterly direction.

**GREEN LANES N21**, Both Sides, from a point 3.5 metres North of the Northern kerb-line of Elm Park Road N21 for a distance of 54.0 metres in a Northerly direction.

**GREEN LANES N21**, Both Sides, from a point 14.5 metres North of the common boundary of Nos. 936 and 938 Green Lanes N21 for a distance of 55.0 metres in a Northerly direction.

**PARK AVENUE EN1**, Both Sides, from a point 2.5 metres North-West of the common boundary of Nos. 158 and 160 Park Avenue EN1 for a distance of 42.0 metres in a North-Westerly direction.

**LONDON ROAD EN2**, Both Sides, from a point 8.5 metres North-East of the common boundary of Nos. 83 and 85 London Road EN2 for a distance of 40.5 metres in a North-Easterly direction.

## Appendix E

## Enfield Council Predictive Equality Impact Assessment/Analysis

<b>Department:</b>	<b>Regeneration &amp; Environment</b>	<b>Service:</b>	<b>Traffic &amp; Transportation</b>
<b>Title of decision:</b>	Cycle Enfield proposals for the A105	<b>Date completed:</b>	11/01/16
<b>Author:</b>	Paul Rogers	<b>Contact details:</b>	<a href="mailto:paul.rogers@enfield.gov.uk">paul.rogers@enfield.gov.uk</a> 020 8379 3340
<b>Equality Act 2010 – Section 149</b>			
<b>Public sector equality duty</b>			
<p>(1) A public authority must, in the exercise of its functions, have due regard to the need to -</p> <p>(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;</p> <p>(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;</p> <p>(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</p> <p>(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).</p> <p>(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—</p> <p>(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;</p> <p>(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;</p> <p>(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.</p> <p>(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.</p> <p>(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—</p> <p>(a) tackle prejudice, and</p>			

- (b) promote understanding.
- (6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.
- (7) The relevant protected characteristics are—  
age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
- (8) A reference to conduct that is prohibited by or under this Act includes a reference to—  
(a) a breach of an equality clause or rule;  
(b) a breach of a non-discrimination rule.
- (9) Schedule 18 (exceptions) has effect.

**Type of change being proposed:** (please tick)

New project	<input checked="" type="checkbox"/>	Policy change or new policy		Grants and commissioning		Budget change	
-------------	-------------------------------------	-----------------------------	--	--------------------------	--	---------------	--

**1** Describe the change, why it is needed, what is the objective of the change and what is the possible impact of the change:

**Background**

With traffic levels increasing year on year, air quality will get worse and Enfield's roads will eventually grind to a halt. This will be exacerbated by the expected increase in the population by an additional 80,000 by 2040. Doing nothing is not an option. The Cycle Enfield programme is an opportunity to start addressing these problems by enabling residents to consider making journeys by bike instead of the car. Cyclists are able to make more efficient use of road space relative to all other modes of surface transport except buses and do not emit pollution. Cycle Enfield will also enable us to make significant public realm improvements at town centres along the route, thereby making them more attractive and encourage people to spend more time and money in local shops and restaurants.

Cycle Enfield is about delivering a network of safe, direct and legible cycle routes and a programme of supportive measures to encourage more people to cycle. This will deliver many economic, environmental, health and transport benefits for local residents and businesses.

Between 17 July and 9 October 2015, Enfield Council undertook a public consultation on the A105 scheme. We wrote to all properties within 400 metres of the proposed route, inviting local residents and business owners/managers to attend an exhibition and participate in the consultation. We also consulted residents associations, disability groups, cycling groups, the Police, London Ambulance Service and London Fire Brigade, transport user groups and bus operators. Detailed information on the proposals was published at <http://cycleenfield.co.uk/have-your-say/a105-scheme-consultation>. We provided copies of the consultation documents to those people that requested them in hard copy and accessible formats e.g. large print, Braille and audio.

The focus of the A105 consultation was about shaping the scheme to provide high quality, segregated facilities to encourage more people to cycle whilst meeting the needs of residents, businesses and visitors to Enfield. Enfield Council received a total of 1,646 responses to the A105 consultation. The majority of respondents supported the overall proposals with 50.7% (835) fully supporting and 8.6% (142) partially supporting the scheme. 38.9% of respondents (640) did not support the scheme and 1.8% (29) either had no opinion or were unsure.

#### **Proposal**

The A105 is the first of our main road cycling schemes and involves the installation of lightly segregated cycle lanes on both sides of the A105 between Enfield Town and Palmers Green. Additional traffic lights will be installed to remove conflicts and enable cyclists to pass safely through junctions. The scheme also involves significant public realm improvements at Palmers Green and Winchmore Hill, the creation of two minor areas of 'shared space', installation of new zebra crossings, side road entry treatments, raised tables and the remodelling of key junctions. To accommodate the new cycle lanes, it will be necessary to remove all central refuges, two sections of bus lane and approximately 70 kerb-side parking spaces. Relevant guidance, best practice and further engagement with stakeholder groups will help to develop the detailed designs and address comments and concerns raised by or on behalf of older people and those with disabilities.

Officers have carefully considered the concerns and issues raised in the consultation with respect to equalities, and have already made a number of design changes, e.g. the introduction of buffer strips at bus stop boarders. Any remaining concerns will be addressed during the detailed design phase and statutory consultation.

#### **Comments from Key Stakeholders**

Below are common issues raised by respondents, with officer responses shown in italics:

Concerns about response times for emergency service vehicles

*Officers met with the Metropolitan Police and London Fire Brigade to discuss possible impacts of the scheme on their emergency response times. No concerns were raised at these meetings or via the consultation. London Ambulance Service have so far turned down our repeated requests for a meeting. However, there will be other opportunities for them to provide comments during the statutory consultation.*

Concerns about the effects of the scheme on shops and businesses

*Loading bays at Winchmore Hill and Palmers Green will be retained in their existing locations. At Lodge Drive car park, we will create 20 new parking bays. These will be free for the first 45 minutes to enable people to visit local shops and takeaways. After 6.30 pm parking will be free to support the evening economy. At Ford's Grove car park, we will introduce pay & display parking to increase turnover of parking spaces. As at Lodge Drive, 20 parking bays will be free for the first 45 minutes to enable people to visit local shops and takeaways. After 6.30 pm parking will be free to support the evening economy.*

**Concerns about the effects of the scheme on the night time economy**

*Loading bays at Winchmore Hill and Palmers Green will be retained in their existing locations. At Lodge Drive car park, we will create 20 new parking bays. These will be free for the first 45 minutes to enable people to visit local shops and takeaways. After 6.30 pm parking will be free to support the evening economy. At Ford's Grove car park, we will introduce pay & display parking to increase turnover of parking spaces. As at Lodge Drive, 20 parking bays will be free for the first 45 minutes to enable people to visit local shops and takeaways. After 6.30 pm parking will be free to support the evening economy.*

**Concerns about cyclist behaviour**

*These will be addressed by cycle training and enforcement*

**Concerns about a lack of parking close to shops**

*As much on-street parking as possible is retained given the need to maintain continuous segregated cycle facilities. Additional parking is provided in Lodge Drive car park and Fords Grove car park will be managed to better support the town centre.*

**Concerns about the level of provision of disabled parking**

*Apart from the disabled bays in Lodge Drive and Ford's Grove car parks, there are currently no disabled parking bays along the A105. We will review disabled parking provision during the detailed design phase and statutory consultation, including looking at the need for additional dedicated bays for blue badge holders in side roads. Although not directly raised during the consultation it is acknowledged that some blue badge holders may be parking on the residential sections of the A105 even though there are no dedicated bays at present. This will be addressed at the detailed design stage and footway crossovers provided (subject to planning permission being granted) where parking is displaced by Cycle Enfield and parking can be safely provided off-street.*

**Concerns about Dial-a-Ride services**

*Dial a Ride vehicles will be able to stop briefly in cycle lanes to pick up and set down passengers*

**Concerns about loading**

*The loading bays at Palmers Green and Winchmore Hill will all be retained in their existing locations.*

**Concerns about the arrangements for pedestrians at bus stop boarders and bus stop by-passes**

*Bus stop boarders and bus stop by-passes have been successfully introduced in Camden, Central London and Lewes. Accident rates did not go up and people soon got used to the new arrangements. As a result of comments received, we have incorporated a 500mm wide buffer between the kerb and the cycle lane at most bus stop boarders.*

**Concerns about the removal of informal crossing points and central refuges**

*The proposals involve installing new zebra crossings and replacing some informal crossings with zebra crossings*

Conflict with the blind and partially sighted

*We will follow the relevant guidance during the detailed design phase.*

Allocation of spending

*The funding can only be used to deliver the Mayor's Cycling Vision for London.*

Below are the comments of disabilities groups consulted relevant to the EQIA. Officer responses are shown in italics.

**Over 50s forum**

The Enfield Over 50's forum partially supports the Cycle Enfield proposals for the A105 and submitted the following comments:  
We have no problem with the idea of the A105 corridor being safe for cyclists. However we are concerned about pedestrians getting off buses and having to cross the cycle lane to reach the pavement. In addition we oppose the loss of on-street parking, for residents on the route as well as for businesses, and the lack of convenient stopping places for service vehicles, e.g. minibuses picking up elderly or disabled people from their homes, because of the restriction of parking kerbside where there is a cycle lane. This is of particular concern because those who use such vehicles are less able physically, often have sight difficulty and find a particular problem in inclement weather.

*Officers have addressed these concerns by:*

- Improving the design of most of the bus boarders so they incorporate a buffer strip between the bus and the cycle lane.*
- Minimising the loss of parking in residential sections and allowing blue badge holders and dial-a-ride vehicles to park in the cycle lane to set down and pick up.*
- Providing additional parking in Lodge Drive and Ford's Grove car parks which will be free for blue badge holders.*
- Reviewing the provision of parking for blue badge holders as part of the development of detailed design.*

**Guide Dogs for the Blind**

Guide Dogs for the Blind do not support the Cycle Enfield proposals for the A105 and submitted the following comments. The comments provide a useful checklist of issues to be addressed as part of the detailed design but officers' initial responses are set out below in italics.

**Shared surface streets**

The shared space concept is intended to be a way to provide an attractive environment, with slower traffic, less street clutter and a people friendly space. All of which we would support. However, one of the ways of implementing a shared space scheme is by introducing a shared surface street, sometimes called a level surface. This is where the footway and carriageway are of the same level with no kerb upstand. There may also be on uncontrolled pedestrian crossings.

*The shared space concept has only been applied to two lightly trafficked service roads along the A105. These will be carefully designed to mitigate the concerns of people with impaired vision and mobility.*

Key concerns:

- You have to make eye contact

Pedestrians, motorists and cyclists have to make 'eye contact' to decide who moves first. This obviously compromises the safety, independence and confidence of blind and partially sighted people. Blind and partially sighted people face a similar problem when crossing a standard road. *However, bringing the road up to footway level will lead to drivers being more cautious and improve safety for all road users.*

- People rely on the kerb

Blind and partially sighted people, particularly guide dog owners and long cane users, use the kerb as a navigation clue to know where they are in a street.

*A low kerb will be incorporated at the detailed design stage to provide a navigation clue.*

Tactile paving

Tactile paving should be provided at signal controlled crossings; dropped kerbs; or where the footway and carriageway are level at a junction; top and bottom of steps; at station platforms; and shared cycle and pedestrian routes. It is important that the appropriate tactile paving surface is used and the correct specification followed. All the different types and the recommended layout are provided in the Department for Transport 'Guidance on the use of tactile paving surfaces'.

*We will follow best practice where applying tactile paving to the A105 scheme at the detailed design stage.*

Pedestrian crossings

Controlled crossings should be provided and must have visual, audible and tactile signals. In addition they must have tactile paving as recommended in the 'Guidance on the use to tactile paving surfaces'.

*A number of new controlled pedestrian crossings are proposed in the A105 scheme and these will be of great benefit to the visually and mobility impaired. These will all be constructed with the relevant visual, audible and tactile signals and paving.*

Street furniture

Street furniture should be provided in a consistent pattern and not create obstructions on the footway. They should have good contrasting features and at the same time not cause glare as can be the case with stainless steel.

*The A105 proposals provide an excellent opportunity to declutter the high streets and provide a consistent pattern of street furniture.*

**Visual contrast**

Material, features and street furniture should have good tonal and colour contrast to enhance visibility for blind and partially sighted people with some residual vision. In addition, they should retain their contrasting features in wet and dull weather conditions. Uniform lighting is also essential and should enhance the street environment at night.

*These principles will be applied at the design stage.*

**Bus Stop By-passes**

We understand that from a cycle safety point of view, this is a positive design, to segregate them from the traffic, and allow an easy approach to the bus stop for buses. However, Transport for London/Enfield Borough Council has a duty of care to pedestrians, especially, in this case blind and partially sighted pedestrians - in its current form, we don't believe that has happened.

*We believe that the current design for bus boarders does make it clear that pedestrians have right of way. However we will carefully consider all the points made by Guide Dogs for the Blind at the detailed design stage and make amendments where necessary.*

**Royal National Institute for the Blind**

The RNIB do not support the Cycle Enfield proposals and provided some general comments. Concerns were expressed about inaccessible crossings, a negative impact on public transport and the disruptive impact arising from proposed changes to the locations of crossings.

*These comments will be addressed during the detailed design phase, building on the more detailed comments provided by Guide Dogs for the Blind.*

**Age UK**

*No comments or suggestions were received from Age UK*

**Enfield Disability Action**

*No comments or suggestions were received from Enfield Disability Action*

**Enfield Vision**

*No comments or suggestions were received from Enfield Vision*



## 2 Do you carry out equalities monitoring of your service? If No please state why?

The 'service' in this instance relates to users of the A105 corridor, including residents, businesses and community uses located along the route. However, there is limited specific information about the characteristics of the range of service users, which includes private vehicle users; taxis/minicab users; bus users; dial-a-ride users; pedestrians and cyclists. This is partly due to the range of organisations involved in providing services and partly due to the difficulty in collecting relevant equalities monitoring data.

Some context about the areas served by the A105 corridor is provided in the 2011 Census and the analysis included in the ward profiles for Bush Hill Park, Grange, Palmers Green and Winchmore Hill wards. The table below summarises some of the relevant characteristics of the key indicators and compares these to the borough average:

	<b>Aged 65+</b>	<b>Health/Disability<sup>1</sup></b>
<b>Borough</b>	<b>12.8%</b>	<b>7.3%</b>
Bush Hill Park	18.0%	7.1%
Grange	19.7%	6.2%
Palmers Green	13.8%	7.4%
Winchmore Hill	15.3%	6.3%

<sup>1</sup> Persons with long term health problems/disability - limiting a lot

This suggests that a higher than average proportion of people living in the four wards are 65 or over (particularly in Grange and Bush Hill Park wards). It is also clear that a significant number of residents have a long term health problem or disability that is significantly limiting, albeit the proportion are either around or below the borough average..

The section below summarises the equalities monitoring carried out in relation to the A105 consultation itself. This highlights the support/partial support for the scheme falls below 50% for those aged 60 and above; that men are more positive about the proposals than women; and that the majority of disabled people did not support the proposal. To address these concerns there will need to be continuing engagement with all affected parties, both to help inform the detailed designs and to address identified issues and concerns post-implementation.

### Protected characteristic: Age

Of the 1,646 people who responded to the consultation 3.2% (53) are aged 0-24, 77.2% (1,271) are aged 25-64, 18.3% (302) are 65 and above and 1.2% (20) preferred not to say.

Below is a table showing how the level of support for the proposals varies with age. The table excludes the responses of 20 people who preferred not to tell us their age.

Level of support	Age Group																	
	0-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-64	65-69	70-74	75-79	80-84	85+
Support	2	9	5	6	16	51	101	128	111	104	108	73	50	43	13	6	2	0
Don't support	0	0	0	4	10	19	19	29	48	63	79	77	84	86	57	22	17	10
Partially support	0	0	0	0	1	4	14	10	15	14	18	17	18	16	7	3	5	4
Not sure	0	0	0	0	0	0	2	0	0	2	1	4	6	5	2	1	1	1
No opinion	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	0	0	0
Total	2	9	5	10	27	74	136	167	174	183	206	171	160	151	79	32	25	15

From the above table it is apparent that:

- Respondents aged 50-54 submitted more responses than any other group
- 100% of respondents aged 14 and under support the proposals.
- The level of support (full + partial) decreases with age and dips below 50% at 60 years of age

**Protected characteristic: gender**

Of the 1,646 people who responded to the consultation 56.3% (927) are male, 42.0% (691) are female, 0.4% (6) are transgender and 1.3% (22) preferred not to say.

Below is a breakdown showing how the level of support for the proposals varies by gender.

Level of Support	Gender			
	Female	Male	Prefer not to say	Transgender
Support	308	518	5	4
Don't support	308	315	15	2
Partially support	62	79	0	0
Not sure	13	12	2	0
No opinion	0	3	0	0
Total	691	927	22	6

From the above table it is apparent that:

- 53.5% of women who responded to the consultation support the proposals (full + partial)
- 64.4% of men who responded to the consultation support the proposals (full + partial)
- 66.7% of transgender people who responded to the consultation support the proposals (full + partial)

**Protected characteristic: disability**

Of the 1,646 people who responded to the consultation 2.9% (48) are limited a lot by a health problem or disability, 6.6% (109) are limited a little by a health problem or disability, 86.8% (1,428) are not affected by a health problem or disability and 3.7% (61) preferred not to say.

Below is a breakdown showing the level of support for the proposals from respondents who have a health problem or disability.

<b>Level of Support</b>	<b>Number of respondents with a health problem/ disability</b>
Support	48
Don't support	88
Partially support	18
Not sure	3
No opinion	0
Total	157

From the above table it is apparent that 42.0% of respondents with a health problem or disability support the proposals (full + partial), 56.1% don't support the proposals and 1.9% are not sure. Some of their concerns, such as those relating to bus stop boarders, have already begun to be addressed and any remaining concerns will be addressed during the detailed design phase and statutory consultation.

<b>3. Equalities Impact</b> Indicate Yes, No or Not Known for each group	Disability	Gender	Age	Race	Religion & Belief	Sexual Orientation	Gender reassignment	Pregnancy & Maternity	Marriage & Civil Partnerships
Does equalities monitoring of your service show people from the following groups benefit from your service? (recipients of the service, policy or budget, and the proposed change) <sup>1</sup>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does the service or policy contribute to eliminating discrimination, promote equality of opportunity, and foster good relations between different groups in the community?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
*Could the proposal discriminate, directly or indirectly these groups?	No	No	No	No	No	No	No	No	No
Could this proposal affect access to your service by different groups in the community?	Yes	No	Yes	No	No	No	No	No	No
Could this proposal affect access <u>to information</u> about your service by different groups in the community?	No	No	No	No	No	No	No	No	No
Could the proposal have an adverse impact on relations between different groups?	No	No	No	No	No	No	No	No	No
<p><sup>1</sup> Although not directly supported by primary data, it is likely that all of the protected groups are users of the A105 corridor</p> <p>If Yes answered above – please describe the impact of the change (including any positive impact on equalities) and what the service will be doing to reduce the negative impact it will have.</p> <p>*If you have ticked yes to discrimination, please state how this is justifiable under legislation.</p> <p>The two protected groups impacted by the A105 proposals are Age and Disability. The preliminary designs have been amended to take account of comments, concerns and suggestions received and thereby prevent, reduce or mitigate any negative impacts as follows. Further changes will be made during the detailed design phase following input from specialist consultants and/or representatives of relevant organisations.</p>									

**Protected characteristic: Age****Positive Impacts**

- Providing segregated facilities will have a positive impact by enabling people of all ages to cycle.
- Replacing informal crossings with zebra crossings will have a positive impact by making it safer for people of all ages to cross the A105
- Supporting measures such as the Bush Hill Park inclusive cycling scheme and cycle training for older adults may encourage more to take up cycling and remain physically active.

**Negative Impacts**

Impact	Mitigation
Possible conflict with cyclists at bus stop boarders	Installation of buffer strips, ramps, signage and distinctive paving to inform cyclists that they are entering an area used by pedestrians and must give priority to pedestrians. Publicity campaign to be launched prior to and following opening of route to inform pedestrians and cyclists how to use the new facilities.
Possible conflict with cyclists if pedestrians drift into parallel cycle track and vice versa	Existing footway widths have been maintained (including those in town centres) and new cycle tracks will be designed with a contrasting surface and clear markings to minimise risk.
Longer distance to walk to some bus stops	Most bus stops are kept in or close to their current locations. However, the current northbound stop close to The Fox is moved further away from Skinners Court extra care flats, but is still within TfL's 400m standard.
Loss of pedestrian refuges	Existing pedestrian refuges have been replaced with zebra crossings where feasible and new zebra crossings introduced. The general narrowing of traffic lanes is also expected to result in reduced speeds along the corridor, potentially making it safer to cross away from formal crossing points.
Change in road layout could result in short term uncertainty whilst all road users adapt to the new road layout	Publicity campaign to be launched prior to and following the opening of route to inform pedestrians and cyclists how to use the new facilities.

**Protected characteristic: Disability****Positive Impacts**

- Replacing informal crossings with zebra crossings will have a positive impact by making it safer and easier for people with disabilities to cross the A105.
- Side road entry treatments in Palmers Green town centre will make it easier for wheelchair users and people with restricted mobility to cross the side roads
- Supporting measures such as the Bush Hill Park inclusive cycling scheme and cycle training for older adults may encourage more to take up cycling and remain physically active.

**Negative Impacts**

Impact	Mitigation
Possible conflict with cyclists at bus stop boarders	Installation of buffer strips, ramps, signage and distinctive paving to inform cyclists that they are entering an area used by pedestrians and must give priority to pedestrians. Publicity campaign to be launched prior to and following opening of route to inform pedestrians and cyclists how to use the new facilities.
Possible conflict with other roads users in 'shared space' areas.	Shared surface treatments are only proposed in two lightly traffic service roads on the A105. The detailed designs will be developed in conjunction with local groups and or specialist advisers, but will involve the use of contrasting materials, tactile surfaces, low kerbs and other measures to help blind and partially sighted pedestrians navigate safely.
Loss of parking for blue badge holders	Blue badge holders will continue to be able to park in marked bays on-street and in off-street car parks for free. Dedicated blue badge bays could be included in the final design or post-implementation if necessary.  Footway crossovers will be provided on the residential sections of the A105 (subject to obtaining planning permission) to enable people, including blue badge holders to park off-street where practicable.
Reduced opportunity for dial-a-ride.	The traffic orders will be drafted to enable Dial-a-Ride vehicles and taxis and minicabs

taxis/minicabs to pick up and set down	transporting Taxicard holders to set down and pick in the cycle lane. The maximum period that such a vehicle can stop will be determined in consultation with relevant disability groups.
Change in road layout could result in short term uncertainty and confusion whilst all road users adapt to the new road layout	Prior to completion, targeted engagement with a wide range of local disability groups to raise awareness of the scheme and its possible impacts. Post completion, provision of advice and/or training in use of new facilities.

<b>4. Tackling Socio-economic inequality</b> Indicate Yes, No or Not Known for each group	Communities living in deprived wards/areas	People not in employment, education or training	People with low academic qualifications	People living in social housing	Lone parents	People on low incomes	People in poor health	Any other socio-economic factor Please state:
Will the proposal specifically impact on communities disadvantaged through the following socio-economic factors?	Yes	Yes	Yes	No	No	Yes	Yes	
Does the service or policy contribute to eliminating discrimination, promote equality of opportunity, and foster good relations between different groups in the community?	Yes	Yes	Yes	No	No	Yes	Yes	
Could this proposal affect access to your service by different groups in the community?	Yes	Yes	Yes	No	No	Yes	Yes	
If Yes answered above – please describe the impact (including any positive impact on social economic inequality) and any mitigation if applicable. <ul style="list-style-type: none"> <li>The A105 scheme will have a positive impact on people living in deprived wards/areas by improving air quality and personal health and fitness. Any shift from public transport or car use to cycling has the potential to increase financial resilience by reducing spend on travel costs.</li> </ul>								



- The A105 scheme will have a positive impact on people who are currently unemployed by making it easier for them to attend training courses and job interviews.
- The A105 scheme will have a positive impact on people with low incomes as travelling by bike is a cheaper alternative than travelling by car or public transport.
- The A105 scheme will have a positive impact on people in poor health by improving air quality, increasing physical activity and helping to tackle obesity. Physical activity has been shown to reduce long-term conditions (heart disease, diabetes, musculo-skeletal problems, mental illness by 20 – 40% depending on the condition.

#### **5. Review**

How and when will you monitor and review the effects of this proposal?

Monitoring and evaluation will take place throughout the life of the scheme.

Due to the difficulty in obtaining primary data about the characteristics of users of the A105 corridor, monitoring will take the form of continued engagement with key stakeholders representing the interests of older people and disabled people. One option would be the setting up of an equalities advisory group(s) to initially advise on the detailed design of the scheme, to provide feedback on its impact once implemented and to help identify further practical mitigation measures.

## Enfield Council Predictive Equality Impact Assessment/Analysis

### Action plan template for proposed changes to service, policy or budget

Title of decision: Cycle Enfield proposals for the A105

Team: Traffic & Transportation

Department: Regeneration & Environment

Service manager: David B Taylor

Identified Issue	Action Required	Lead Officer	Timescale/ By When	Costs	Review Date/ Comments
Stakeholder engagement	Hold Partnership Board meetings at key points Improve dialogue with disability groups and others to help inform detailed designs and throughout construction period	Traffic & Transportation	Ongoing	Fully funded by Transport for London	
Continue to minimise equalities barriers throughout detailed design, statutory consultation and implementation	Review/benchmark with models of good practice and attend training and workshops if appropriate  Establish specialist advisory group or seek specialist consultancy support to assist with the detailed design of the scheme	Traffic & Transportation	Ongoing	Fully funded by Transport for London	
Scheme publicity	Develop campaign aimed at relevant protected	Traffic & Transportation	During construction and after opening of	Fully funded by Transport for London	

	groups to highlight the changes to the road layout		relevant sections of A105 route		
Monitoring	Establish local stakeholder group(s) to provide feedback on the impact of scheme on relevant protected groups	Traffic & Transportation	Ongoing	Fully funded by Transport for London	
Access to service for all	Continue to promote cycling to relevant protected groups to increase take up of cycling	Traffic & Transportation	Ongoing	Fully funded by Transport for London	
Retrospective EQIA	Arrange for a retrospective EQIA to be carried in conjunction with relevant stakeholders/special advisors.	Traffic & Transportation	01/11/2017	Fully funded by Transport for London	

Date to be Reviewed: .....

*R A Crippin*

**APPROVAL BY THE RELEVANT ASSISTANT DIRECTOR - NAME: Bob Griffiths SIGNATURE:.....**  
.....

**This form should be emailed to [joanne.stacey@enfield.gov.uk](mailto:joanne.stacey@enfield.gov.uk) and be appended to any decision report that follows.**

# **APPENDIX 2**

**Call-in request form submitted by 7 Members of  
the Council**

This page is intentionally left blank

~~head - Alessandro Georgian~~

### CALL-IN OF DECISION

(please ensure you complete all sections fully)

Please return the completed original signed copy to:  
Claire Johnson, Scrutiny Team, 1<sup>st</sup> Floor, Civic Centre

TITLE OF DECISION: APPROVAL OF CYCLE ENFIELD PROPOSALS

DECISION OF: CABINET MEMBER FOR THE AIO'S.  
FOR ENVIRONMENT.

DATE OF DECISION LIST PUBLICATION: 18<sup>th</sup> AUGUST 2016

LIST NO: 4/20/16~~8~~-17 Key Decision 4342


(\* N.B. Remember you must call-in a decision and notify Scrutiny Team within 5 working days of its publication).

A decision can be called in if it is a corporate or portfolio decision made by either Cabinet or one of its sub-committees, or a key decision made by an officer with delegated authority from the Executive.

(a) COUNCILLORS CALLING-IN (The Council's constitution requires seven signatures or more from Councillors to call a decision in).

(1) Signature: 

Print Name: NIVE DJE

(2) Signature: 

Print Name: ANNE MARIE PEARCE

(3) Signature: 

Print Name: ERIN CELEBI

(4) Signature: 

Print Name: ANDY MILNE

(5) Signature: 

Print Name: Alessandro Georgian

(6) Signature: 

Print Name: JOSEPH CHARAMANOS

(7) Signature: 

Print Name: Terence Neville

(8) Signature: .....

Print Name: .....

(b) SCRUTINY PANEL RESOLUTION (copy of minute detailing formal resolution to request call-in to be attached).

NAME OF PANEL: Overview & Scrutiny Panel

DATE OF PANEL: 8 September 2016

This page is intentionally left blank



# **APPENDIX 3**

**Reasons for Call-in by Councillor calling in the  
decision**

**&**

**Briefing Note in response to called in decision  
*(Please note this will be a 'to follow' item)***

This page is intentionally left blank

**(1) Reason why decision is being called in:**

1) This statutory consultation followed an earlier consultation online and a "referendum" conducted by the Enfield Southgate MP, David Burrowes. The earlier consultation failed to elicit a clear majority in favour of the proposals and the referendum produced an overwhelming majority against them. The statutory consultation elicited over 1600 objections (see paragraph 5.8 of report). That number of objections to a statutory consultation is almost unprecedented and plainly requires careful consideration. The consultation ran between the 6 July and the 29 July this year. The decision by the Cabinet Member to approve the scheme, with only minor modifications, was signed by him and published on 17 August 2016, a mere 13 working days after the expiry of the consultation period. Given that the officers needed to consider the representations received, all 1600+ of them, and produce a report it is utterly inconceivable that the Cabinet Member could have given proper consideration to the objections that were lodged. Even if one accepts that within the total number of objections, there will be a lot of duplication in terms of the reasons for objections, the schedule in the report itself shows no fewer than 84 different reasons for objecting. It is in our view physically impossible for the Cabinet Member who is the "decision maker" to have properly considered these objections. In this connection the committee's attention is drawn to the judgements in the now leading case of local authority consultation – R-v-Moseley (London Borough of Haringey) where it was clearly stated that one of the factors to be taken into account by the courts was the adequacy of the consideration of the responses to the consultation. We say that on any analysis this would fail that test.

2) The 84 categories of objections listed in the schedule are in themselves individually, all matters worthy of proper consideration but in particular there is an objection from Arriva Bus Company to the proposals as a whole, specifically with the withdrawal of the bus lane going south from the Triangle, Palmers Green towards the North Circular Road. That objection is, on any analysis, a serious one and one which the law, in the form of the Local Authorities' Traffic Orders (Procedure) England & Wales Regulations 1996, records special status to them. In essence the law requires that where such an objection is made by a bus company to something which in effect would restrict the movement of buses along a particular route, the local authority is required to hold a Public Local Inquiry before making the order. It is our contention that, taken as a whole, the objection from the bus company set out in paragraphs 5.17 to 5.21 inclusive, amounts to an objection which requires a public local inquiry to be held.

This is because the essence of the objection is that the removal of a bus lane affects the predictability of the bus service that Arriva are seeking to run. They rely upon a bus lane to improve or assist that predictability and by taking it away that is a restriction in the way in which the bus route will, in future, be able to run. There is also within Arriva's objection letter, quoted in paragraph 5.17 of the report, a concern about the narrowness of the carriageway width of parts of the A105 as a result of the introduction of the cycle lanes. They say quite emphatically that the reduction in carriageway width "will delay buses". As such that clearly is a restriction of the bus service and again we contend that a public inquiry should be held before this order can be made.

The report shows that a meeting was held with Arriva following receipt of their objection in order to discuss the concerns of paragraph 5.18 of the report, acknowledging there will be additional junction delay along the corridor tends to be

somewhat dismissive of Arriva's objections. Be that as it may, it is not for the local authority to be dismissive but to argue its case at a public local inquiry. That has not happened and as such this report should not have been approved. Likewise the removal of the bus lane dealt with at paragraph 5.20 of the report. This paragraph tends once again to be somewhat dismissive of Arriva's concerns by referring to queue linked surveys which apparently demonstrate average peak hour maximum queues not extending beyond the length of the retained bus lane, so that the loss of the bus lane is not anticipated to have a significant impact. The point again is that whilst the local authority is entitled to hold that view, it is not in our view under the law, entitled to make that order before having tested that view in front of a public local inquiry.

On the 24 August, I received from the Commercial Director of Arriva an email in which he informed me that the meeting held with officers did not, in any way, allay Arriva's concerns and that their objections still stood.

3) There are also a number of objections to the proposal not to allow any vehicle (other than those that are specifically excepted - not applicable here) to enter the cycle lane. This prohibition effectively disallows cars, lorries or any other vehicle going into a cycle lane and it therefore follows, that those that wish to effect deliveries in waiting and loading bays cannot lawfully do so. As such, this is the second specific type of objection for which the law prescribes that a public local inquiry has to be held. This is not discretionary, it is a mandatory requirement and once again we say that the Cabinet Member should not have approved this report without having first held a public local inquiry to determine these particular objections.

4) There are many other aspects of the objections that are reported in Section 5 of the report but once again do not appear to have been given adequate consideration and, as I have indicated, given the timescale, almost certainly could not have been properly considered.

The London Ambulance Service (LAS) continues to have what I regard quite serious reservations about the proposal. These are set out in paragraphs 5.14 to 5.16 of the report and although the officers state that the LAS has not "objected" to the proposals, when one reads the quoted passages from their letter it is abundantly clear that they have serious concerns and nowhere does it say, as far as I can see (unlike the London Fire Brigade's response), that the LAS are not objecting. It is, as I see it, as plain as a pikestaff that they are in fact objecting and with good reason, but their objections or indeed representations have been once again dismissed. One has to ask how much time the Cabinet Member spent on considering this report, and in particular the 84 generic objections and the responses of the officers. He cannot escape the responsibility as the decision maker, it is not an officers decision it is the Member's decision and the Member as a decision maker needs to be able to demonstrate that he has properly considered each and every one of the objections (or at least the category of objections – 84 in this case) that have been raised, it is our submission that he could not possibly have achieved this in the timescale involved.

**(2) Outline of proposed alternative action:**

- 1) This matter should be referred back to the Cabinet Member with a request that he considers the requirements for holding a Public Local Inquiry into the objections concerning both the bus lanes and those concerning waiting and loading restrictions.
- 2) The matter is also referred back to the Cabinet Member for a thorough reconsideration of the objections that have been raised.

**(3) Do you believe the decision is outside the policy framework?**

**(4) If Yes, give reasons:** n/a

**FOR DST USE ONLY:**

Checked by Proper Officer for validation –

Name of Proper Officer:

*J. Middleton Alpoys*

Date:

*26/08/16.*

This page is intentionally left blank

# **OVERVIEW & SCRUTINY COMMITTEE**

**8 September 2016**

## **RESPONSE TO** **REASONS FOR CALL IN**

### **PART 1**

#### **Relating to the Following Decision:**

**Decision: Approval of the Cycle Enfield Proposals for the A105**

**Decision Date: 17 August 2016**

**Decision of: Cabinet Member**

**Key Decision No: 4342**

#### **1. Introduction**

- 1.1 On 10 February 2016 Cabinet granted approval for officers to prepare the detailed design and undertake the associated statutory consultation so that lightly segregated cycling facilities and public realm improvements can be introduced along the A105, between Enfield Town and Palmers Green. Cabinet also delegated authority to the Cabinet Member for Environment to approve and implement the final design of the scheme, subject to consultation and completion of all necessary statutory procedures.
- 1.3 The statutory consultation relating to the making of the various traffic management orders required to implement the A105 scheme was completed in July 2016. On 17 August, having considered the various representations and objections received, the Cabinet Member for Environment approved the final design of the scheme and authorised officers to take the necessary steps to implement the scheme, including making the necessary traffic management orders.

#### **2. Reasons for Call In**

- 2.1 The reasons why the decision was called in are attached.

### 3. Response to Reasons for Call In

#### Reason 1 – Insufficient Consideration of Objections

- 3.1 The statutory consultation ran from 6-29 July 2016 and produced in the region of 1,600 representations, comprising 1,280 objections received online, a further 134 copies of a paper based version of the online questionnaire, 98 generic letters of objection from local businesses, and a further 68 letters from local residents/businesses.
- 3.2 All representations and objections have been considered in detail, whether singular issues raised by just one individual or broader objections received in greater numbers.
- 3.3 As set out in Appendix B of Report 16.049, the statutory consultation resulted in objections that were broadly categorised into one of four groupings:
- Objections about the principle of the proposals
  - Objections about a common feature of the proposals
  - Objections about a specific location
  - Objections based on a technical or procedural matter
- 3.4 The so-called ‘Save Our Green Lanes’ (SOGL) group, which is opposed in principle to the Cycle Enfield programme, distributed approximately 15,000 campaign leaflets. This encouraged people to object and provided a series of recommended objections.
- 3.5 75% of the online responses (accounting for approximately 1,000 of the objections) used variations of the phrase ‘The whole of the A105 cycle lane scheme from Enfield Town to Palmers Green’ as directed in the SOGL campaign leaflet. These responses predominantly provided objections in principle to the scheme rather than a specific objection. In addition, the majority of the letters that were received from local businesses (received collectively in one envelope) were all based on one of four generic templates which have then been signed by individual business owners.
- 3.6 Rather than waiting until the consultation period closed, responses were reviewed as they were received. This ensured there was sufficient time for all responses to be considered. Certain key responses were also sent directly to the Cabinet Member for Environment to read in full, including those from:
- David Burrowes MP
  - Save Our Green Lanes
  - FERAA
  - Winchmore Hill Residents’ Association
- 3.7 The relevant legal principles concerning consultation are set out in R v Brent London Borough Council, ex parte Gunning (1985), approved by the Supreme Court in R (Moseley) v London Borough of Haringey. One of the four principles states that ‘*the product of consultation must be conscientiously taken into account in finalising any statutory proposals.*’
- 3.8 This rule does not mean that the decision-maker has to personally read every single response provided in the consultation process, although several responses were in this instance. Rather, it is sufficient if (as was done here) that the decision-maker gives conscientious consideration to a comprehensive and accurate summary of the



consultation responses, as was provided by officers in Report 16.049 and documented in Appendix B. This provides a sound basis for decision making.

- 3.9 Changes to the proposals were made in response to the consultation, including modifying the traffic management order that introduces free parking places along the residential section of the route to remove the limit on length of stay.

### **Reason 2 - Arriva Objection**

- 3.10 Section 9 (3) (a) of The Local Authorities' Traffic Order (Procedure) (England and Wales) Regulations 1996 specifies that a public inquiry should be held before making an order if its effect is to prohibit or restrict the passage of public service vehicles along a road and an objection has been made to the order .....in the case of a road in Greater London, by the operator of a London bus service the route of which includes that road or by London Regional Transport.
- 3.11 Transport for London is the successor to London Regional Transport and fully supports the proposals for the A105, taking into account the impact on bus services. Arriva London operates the 121, 329 and W6 bus routes along or on parts of the A105 on behalf of Transport for London. Arriva's initial comments and officers' responses are set out in paragraphs 5.17-5.21 of the report.
- 3.12 The effect of the orders may be to delay (slightly) the passage of buses, but that does not amount to prohibition or restriction. A public inquiry is not therefore automatically triggered by the objection from Arriva London.
- 3.13 In any event, an email dated 1 September 2016 from the Commercial Planning Manager of Arriva London (Bob Pennyfather) confirms that their objection has been withdrawn.

**From:** Bob Pennyfather (ALN)  
**Sent:** Thursday, 1 September 2016 22:05  
**To:** Lester Scott (ST); [david.taylor@enfield.gov.uk](mailto:david.taylor@enfield.gov.uk)  
**Cc:** Peter Batty (ALN); Rob Hudspith (ALN)  
**Subject:** A105 cycle lanes

Gents,

Further to my meeting with David Taylor and a series of conversations with Scott Lester, I am now able to withdraw my formal objection to this scheme.

However, as discussed with you both, I still have some concerns over aspects of the scheme and I look forward to us working together to achieve the best outcome for both bus passengers and cyclists.

Can I please remind David that he was going to send me his notes of our meeting.

Regards

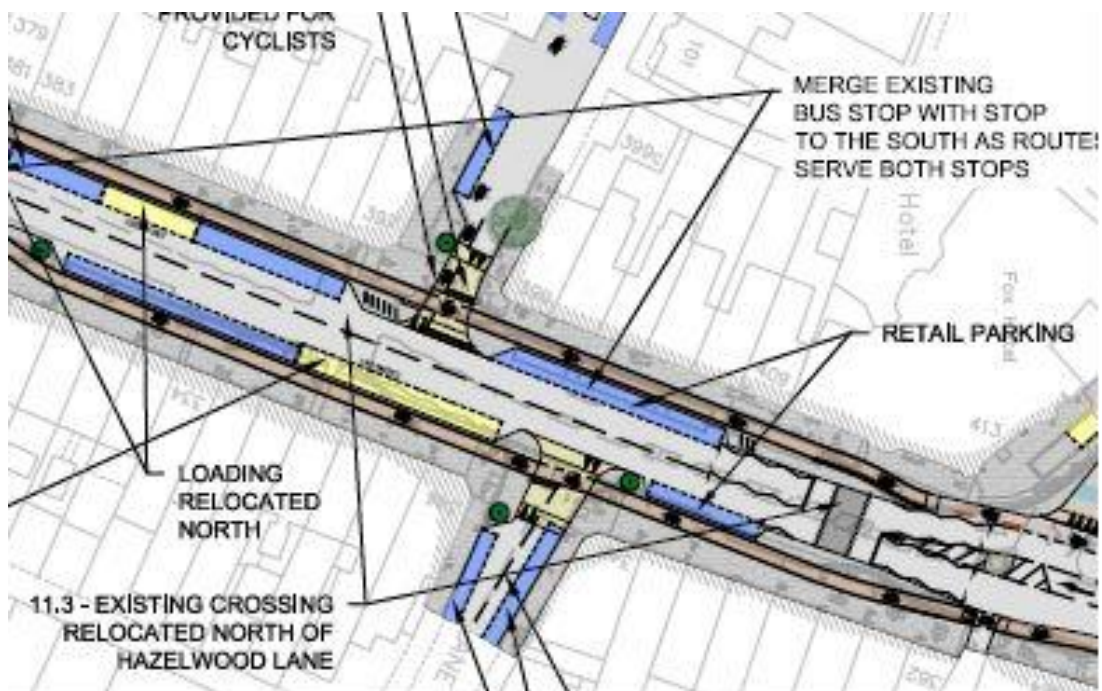
Bob

Sent from my Samsung Galaxy smartphone.

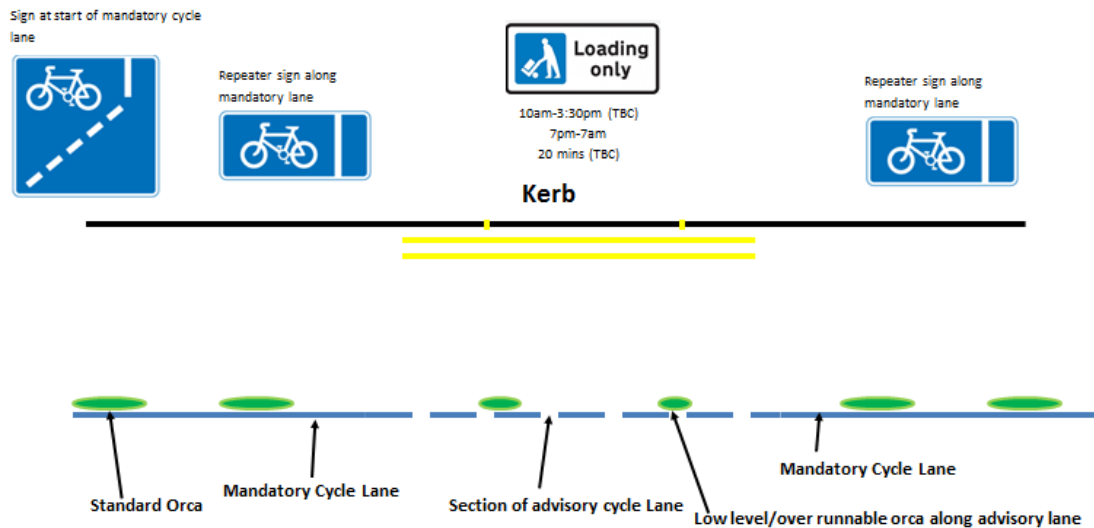
- 3.14 There is therefore no longer an outstanding objection to any of the traffic management orders from a bus operator so a public inquiry cannot be triggered on the basis of Section 9 (3) (a) of The Local Authorities' Traffic Order (Procedure) (England and Wales) Regulations 1996.

### Reason 3 – Loading & Unloading

- 3.15 This reason for call-in demonstrates a misunderstanding of the workings of the scheme as it appears to be predicated on an assumption that vehicles cannot legally access the loading facilities. This assumption is incorrect.
- 3.16 Different loading arrangements are proposed for the commercial and residential sections of the route. In commercial areas, loading bays are located outside of the cycle lanes and vehicles do not need to cross them in order to load or unload. The diagram below illustrates the typical layout, with loading bays designated in yellow (blue illustrates parking bays) and the cycle lane running along the inside of parking and loading. This design layout provides increased protection for more vulnerable road users, avoiding conflict with parking motor vehicles as they enter and exit loading and parking bays:



- 3.17 In addition, loading gaps will be provided at regular intervals along the residential sections of the route. These are created by making the cycle lane advisory over a short distance; placing double yellow lines at the kerb side to prevent parking; and introducing a loading restriction to prevent loading and unloading during peak periods. The concept is illustrated in the diagram below:



- 3.18 The effect of these loading areas will be to enable loading and unloading during off-peak periods. These measures will be introduced experimentally using powers provided by Section 9 of the Road Traffic Regulation Act 1984 to allow them to be modified, if necessary, in the light of feedback and operational experience. Amongst other things, using experimental powers will enable the restricted hours to be varied so that the restriction may apply between 3:30pm to 7pm to ensure that the cycle lane is kept clear during the period when children and families may be travelling home from school.
- 3.19 Section 9(3)(a) of The Local Authorities' Traffic Order (Procedure) (England and Wales) Regulations 1996 specifies that a public inquiry should be held before making an order "*if its effect is to prohibit the loading or unloading of vehicles or vehicles of any class in a road on any day of the week*
- (i) *at all times;*
  - (ii) *before 07.00 hours;*
  - (iii) *between 10.00 and 16.00 hours; or*
  - (iv) *after 19.00 hours,*
- and an objection has been made to the order (other than one which the order making authority is satisfied is frivolous or irrelevant) and not withdrawn".*
- 3.20 As described above, loading will not be restricted at all times, which addresses point (i). Loading will be possible before 07.00 hours and after 19.00 hours, which addresses points (ii) and (iv). Loading will also be available outside of peak hours, between 10.00 and in this case, potentially 15.30 rather than 16.00 hours, which substantially addresses point (iii).
- 3.21 In any event, irrespective of the detailed times, all of the waiting and loading restrictions are to be introduced on an experimental basis to enable them to be modified in an expedient manner in the light of feedback and operational experience. Section 9(5)(a) of The Local Authorities' Traffic Order (Procedure) (England and Wales) Regulations 1996 states that Paragraph (3) does not apply to an experimental traffic management order made pursuant to Section 9 of the Road Traffic Regulation Act 1984. There is therefore no requirement to hold a public inquiry in this instance.

#### **Reason 4 – London Ambulance Service Comments**

- 3.22 Reason 4 appears to largely be a repeat of Reason 1, restating that objections have not been given adequate consideration. However, specific mention is made of the comments received from the London Ambulance Service (LAS).
- 3.23 The LAS has provided a number of comments on the proposals since the scheme was considered by Cabinet in February 2016. On 8 March 2016 the LAS Stakeholder Engagement Manager stated:
- “Below I have outlined some areas debated with you today Paul. These points are not objections as such, more issues raised / potential concerns.*
- 1. The reduction of the road width.*
  - 2. Management of vehicles that breakdown and block the road.*
  - 3. Traffic that avoid main routes and use RAT runs.*
  - 4. Issues around the ability of vehicles to move out of the way of 999 ambulances on route to 999 calls.*
  - 5. If congestion does increase on these routes then the potential for ambulance service fleet to be slowed down while on duty”.*
- 3.24 Similar points to the above were received in response to the statutory consultation and were included verbatim in Report 16.049, paragraphs 5.14 and 5.15, together with the officer response in paragraph 5.16.
- 3.25 Regardless of whether or not the LAS comments constitute a formal objection, their comments have been fully considered, as set out in Report 16.049. Nonetheless, officers will continue to work with the LAS (and other emergency services) post-implementation to monitor the impact of the scheme and to identify suitable mitigation measures, if and as required.

**REPORT TO: OVERVIEW AND SCRUTINY COMMITTEE****DATE: September 8<sup>th</sup> 2016****REPORT TITLE: Activity overview of 'Children in Need', 'Child Protection' and 'Looked-After children' in Enfield: 2015/16****REPORT AUTHOR: Julian Edwards: Interim Assistant Director: Children's Social Care****PURPOSE OF REPORT: This report is designed to inform members about levels of activity locally for children who are defined as being 'in need', including those children for who the local authority has had to initiate child protection processes and those children who are in the care of the Council.****The report provides locally available information and (where comparative data is available), will benchmark the data with statistical neighbours.****The report needs to be read in conjunction with reports from the Local Authority Designated Officer (LADO) and the annual Independent Reviewing Officer report.****SUMMARY: This report is designed to update the Scrutiny Committee about workload and activity levels and trends and follows on from similar reports presented to the Committee in Autumn 2015.****1. BACKGROUND****Children in Need**

All the work of Enfield's Children's social work teams is regulated by the statutory framework of the Children Act and other associated legislation (e.g. Adoption legislation, Leaving Care Act).

The Children Act 1989 provides the statutory framework for local authority services in respect to 'children in need'

*It shall be the general duty of every local authority.....*

- a) *to safeguard and promote the welfare of children who are in need , and*
- b) *so far as is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children's needs.*

Section 17 of the Children Act 1989 has historically defined a child as being 'in need' if:

- *He or she is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the LA;*
- *His or her health or development is likely to be significantly impaired, or further impaired, without the provision of services from the LA;*
- *He or she has a disability.*

The definition includes any child or young person under the age of 18.

## **Child Protection**

Within the definition of 'Children in Need' outlined above, there are a group of children where the local authority has to initiate its Child Protection duties, powers and statutory responsibilities.

*Where a local authority.....have reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm, the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.*

(Children Act 1989: Section 47)

Social workers within our children's social work teams have to be conversant with the above legislation and must also have regard to:-

- Working Together to Safeguard Children (H.M. Government: 2015)
- Pan-London Child Protection Procedures (London Safeguarding Children Board : 2015 )

Our work with vulnerable children and their families is therefore by definition, of a statutory nature, is highly regulated and subject to regular external inspection.

## **Looked-After Children**

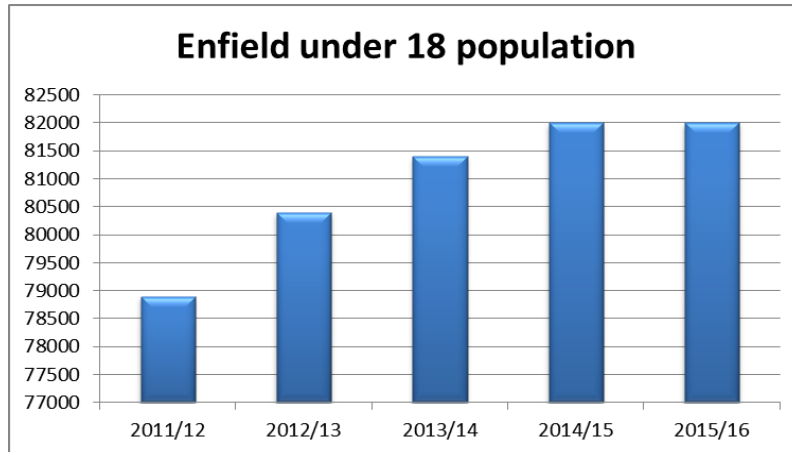
Sadly, some children cannot be safely cared for within their own families or family networks and these children will enter the care of the Council, either through a voluntary arrangement with their parents (Section 20: Children Act 1989) or via the making of a Care Order (Section 31: Children Act 1989).

Enfield's care population also includes 'Unaccompanied Asylum-seeking children (UASC) who are living in the UK without any parent or relative and for whom the local authority has therefore to assume a parental duty.

## **2. ISSUES AND CHALLENGES**

### **The impact of recent demographic change**

As reported last year, Enfield has experienced significant change over the last few years in terms of the size and nature of its population; this has included an increase in the baseline child population together with an increase in the numbers of children in Enfield who are living in poverty.



As well as the increase in child population, Enfield has also been dramatically affected by the changes associated with the Welfare Reform agenda. The most recent available data from IDACI (The Income Deprivation Affecting Children Index) measures the proportion of all children aged 0 to 15 living in income deprived families. Their data concludes that Enfield is the 13<sup>th</sup> most deprived borough nationally and the 5<sup>th</sup> most deprived in London. The London Boroughs with greater levels of deprivation than Enfield have smaller baseline populations, meaning that Enfield now has the largest number of children living in poverty of any London borough.

It is well-researched that the demand for children's social care services is closely related to the level of 'need' within a geographical area and that the level of 'need' is closely related to 'levels of parental poverty'; indeed 'parental poverty is the most prevalent risk factor in terms of the characteristics of children being made subject to Child Protection Plans and/or becoming looked-after children.

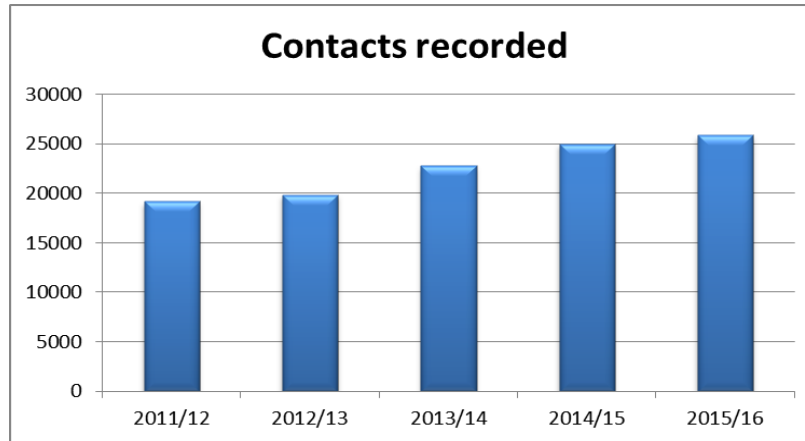
*'Research evidence showed there is an association between poverty and an increased risk of child maltreatment, particularly neglect and physical abuse (NSPCC: 2008)*

### **Contacts, Referrals and Child Protection activity**

Children's Social Care Services receive a considerable number of 'Contacts' every day from professionals in other agencies (e.g. Schools, Police, Hospitals, etc.) where the contact is indicating that there is a concern about a specific child or young person.

These 'contacts' are then considered by a qualified and experienced social worker who will make a decision about what response should be provided to the situation and/or whether this matter needs to be responded to by a social worker in Enfield's Assessment team. They will take into account the stated nature of the concern, previously available historical information, attitude/response of the parent/carer and any other relevant available information in making this decision.

There has been a significant increase in the number of 'Contacts' being made to Enfield's children's services in the last few years – the figures for the last five years are shown in the chart below

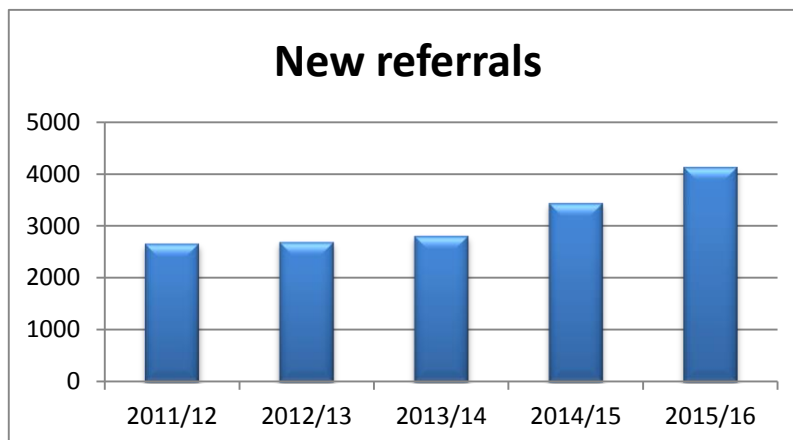


Many of these 'Contacts' are appropriately responded to, by non-statutory or 'Early Help' services e.g. Children's Centres, Parent Support Service etc. The development of Enfield's Single Point of Entry (SPOE) has greatly improved this process, by effectively dovetailing the work of both our preventive services and our statutory services, thereby ensuring that children and families are helped and supported by the most appropriate team or service.

It is known that, wherever appropriate, early help or early intervention services can have a much more significant impact in families and households than the introduction of statutory social work services. Many families will prefer to accept help from non-statutory organisations. Enfield is fortunate in that it still has a number of high-quality Early Help services e.g. Children's Centres, Parent Support Service, Domestic Violence support services etc. that can prevent the deterioration of situations within households which might otherwise then require more intensive and expensive statutory intervention.

However there still remain a significant number of cases that require referral through to children's social care – either for a 'Child & Family Assessment' or for a 'Child Protection Investigation' to take place. Such cases require a qualified social worker to undertake the casework.

The chart below shows the increase in 'referrals' to Enfield's children's social care services over the last five years



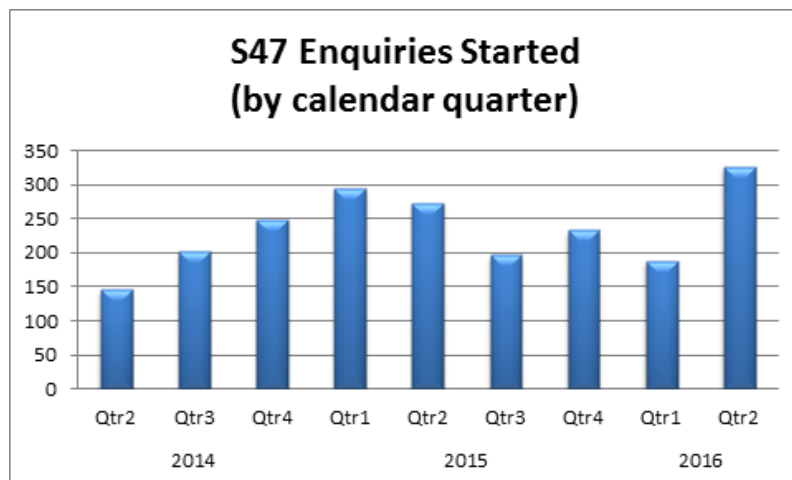
It can be seen from the above information that Enfield is currently receiving approximately 50% more referrals than we were three years ago. This is creating a considerable amount of pressure on our services and warrants further detailed consideration.



A research project has therefore been commissioned to examine this data in greater detail and to consider the reasons for this significant change. An initial hypothesis would be that the increase is closely linked to:

- Demographic changes
- Increased awareness of high profile issues such as child sexual exploitation (CSE), female genital mutilation (FGM) etc
- Improvements in notification in the area of domestic abuse/violence

Within the above referrals a certain proportion will need to be responded to via formal initiation of Child Protection Procedures (utilising Section 47 of the Children Act). The chart below shows the number of Child Protection Enquiries being opened in Enfield.



The numbers of children subject to Child Protection Plans has varied significantly during the last year (please see the Independent Reviewing Officer report). We have been gradually introducing a new approach to our child protection work entitled 'Signs of Safety' - this has been endorsed by the Enfield Safeguarding Children Board (ESCB). It is possible that the introduction of this new programme is affecting some of our current statistics, so I would advise caution in interpreting this data at the present time.

At the point in time of writing this report, we have 199 Children subject to Child Protection Plans. These children are from 102 households within the borough. All children subject to Child Protection Plans must have an allocated social worker.

The information contained within the IRO report confirms that generally our performance in regard to Child Protection has been of a good standard and undertaken in a timely manner.

All of the available data about child protection activity and child protection interventions is closely monitored by Enfield's Safeguarding Children Board.

### **Looked-After Children (LAC)**

The Overview and Scrutiny panel received detailed information last year about Enfield's LAC population. Issues and trends associated with our LAC are closely monitored by the Councils' Corporate Parenting Panel.

I will briefly summarise below key issues emerging from the data for 2015/16 (please also refer to the IRO report):

Our overall end-of year figure for LAC was very similar to that of the previous year; however some discernible differences are apparent within the cohort :-

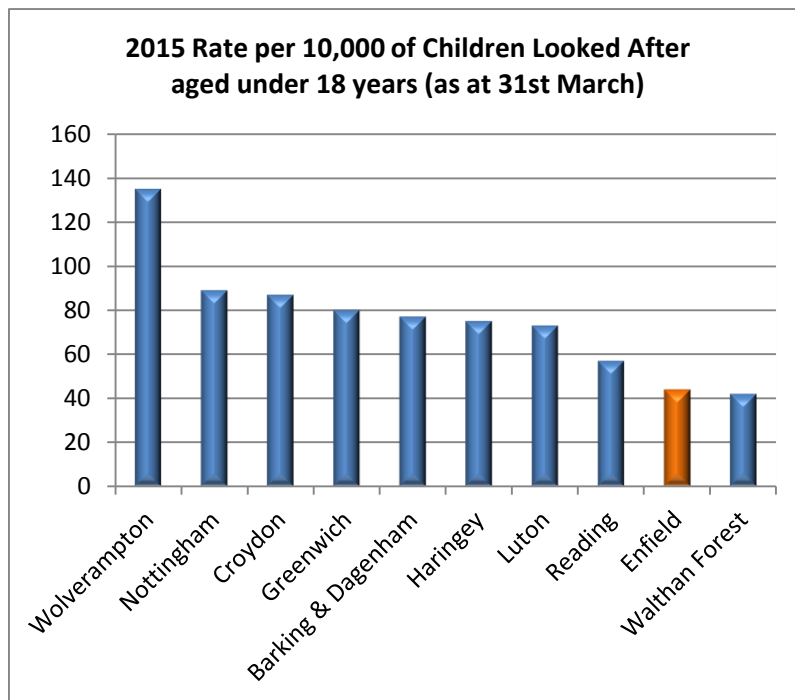
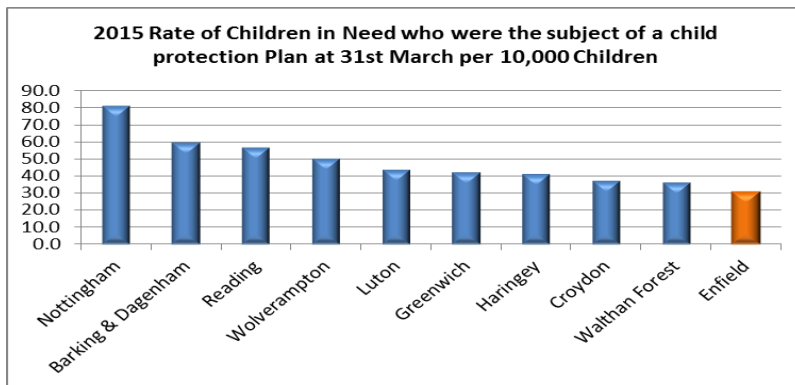
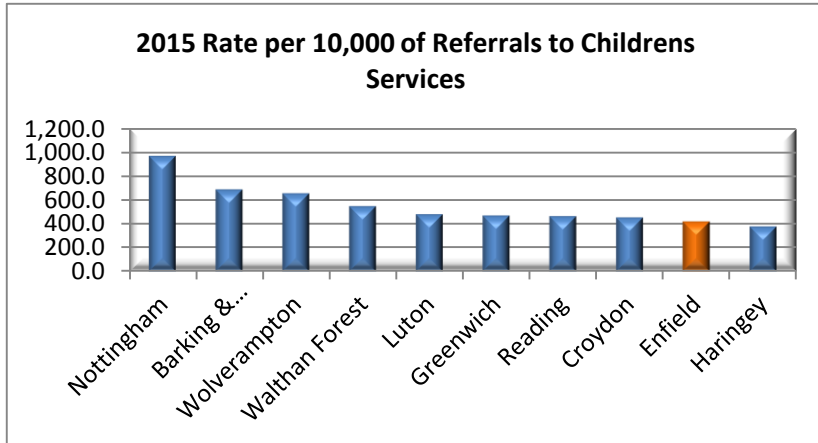
- The age –profile of Enfield’s LAC appears to have altered in the last year, with less younger children in care, counter-balanced by an increasing population of adolescents often with complex behavioural problems.
- The numbers of UASCs within the LAC population has increased significantly during 2015/16, 19.4% (70/359) at end of March 2016 were UASC, compared to 14.3% (51/356) as at March 2015. UASCs are generally aged 14 and over.
- The number of children adopted during 2015/16 is less than that in previous years, 15 adoptions in 2015/16, 19 in 2014/15
- The number of children leaving care via Special Guardianship Orders during the year was 11, which is similar to previous years.
- As at 31 March 2016 9.4% (34/359) of our LAC children have a diagnosed disability

Many adolescents who enter care have other associated difficulties – these can include gang associations, concerns re. Child Sexual Exploitation (CSE), exclusion from education etc. These young people can display extremely challenging behaviour and can be very difficult to care for in family settings. Enfield’s use of residential care remains proportionately low compared to that of other local authorities. Wherever possible, we seek to place looked after children within family settings where generally their outcomes will be better than for placement in residential settings.

### **Comparative Data**

Comparisons with comparable local authorities can be informative; Enfield’s current ‘family of statistically similar local authorities are Waltham Forest, Croydon, Greenwich, Birmingham, Haringey, Luton, Barking & Dagenham, Reading, Nottingham and Wolverhampton.

The most recent available information about the number of children referred to Children’s Services or made subject to Child Protection Plans or being looked after in these local authorities is outlined below.



In considering why different local authorities have varying levels of statutory work (i.e. Child Protection and LAC), researchers have concluded that levels of activity are a 'function of need' and three significant variables:

- Prevention – quality and availability of services
- Risk thresholds – how local authorities interpret and exercise their statutory responsibilities
- Throughput/Discharge – effective and efficient systems for progressing casework.

### **3. RECOMMENDATIONS**

It is recommended that the Scrutiny Committee note the content of this report and the information it contains.

### **4. NEXT STEPS**

The committee is asked to consider whether it wishes to receive further updating reports on the subjects contained within this report.



**Safeguarding and Quality Service**  
**LADO Local Authority Designated Officer**  
**Annual Report 2015 - 2016**

Author	Maria Anastasi Service Manager and LADO	Classification	OFFICIAL - PUBLIC	Date of First Issue	31 <sup>st</sup> August 2016
Owner	Maria Anastasi Service Manager and LADO	Issue Status	Approved 31 <sup>st</sup> August 2016	Date of Latest Re- Issue	
Version	0.1	Page	10	Date of next review	May 2017

<b>CONTENTS</b>	<b>Page</b>
<b>INTRODUCTION</b>	<b>3</b>
<b>BREAKDOWN OF ALLEGATIONS</b>	<b>4 - 6</b>
<b>OTHER LADO RELATED ACTIVITIES</b>	<b>6</b>
<b>TRAINING</b>	<b>7</b>
<b>REVIEW OF WORK PLAN 2014-2015 AND WORK PLAN 2016-2017</b>	<b>8-9</b>
<b>KEY CONTACTS</b>	<b>9</b>
<b>APPENDIX</b>	<b>10</b>

## 1. INTRODUCTION

1.1 The role of the LADO is set out in the Working Together to Safeguard Children (2015). The new guidance requires local authorities to have a particular officer or a team of officers to be involved in the management and oversight of allegations against people who work with children and that this officer or team of officers are sufficiently qualified and experienced to fulfil this role effectively. It also requires newly appointed officers to be qualified social workers.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419595/Working\\_Together\\_to\\_Safeguard\\_Children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf)

1.2 In Enfield, the role of the LADO is undertaken by the Service Manager of Safeguarding and Quality Service (SQS), who has overall responsibility for overseeing investigations, alerting senior council officers to allegations of a serious nature, and making referrals to the Disclosure and Barring Service. Child Protection Conference Chairs/Independent Reviewing Officers in the Safeguarding and Quality service on occasions will lead on investigations, but the LADO remains the overall responsible officer and oversees all investigations. The LADO and the Child Protection Conference Chairs/Independent Reviewing Officers are all qualified social workers

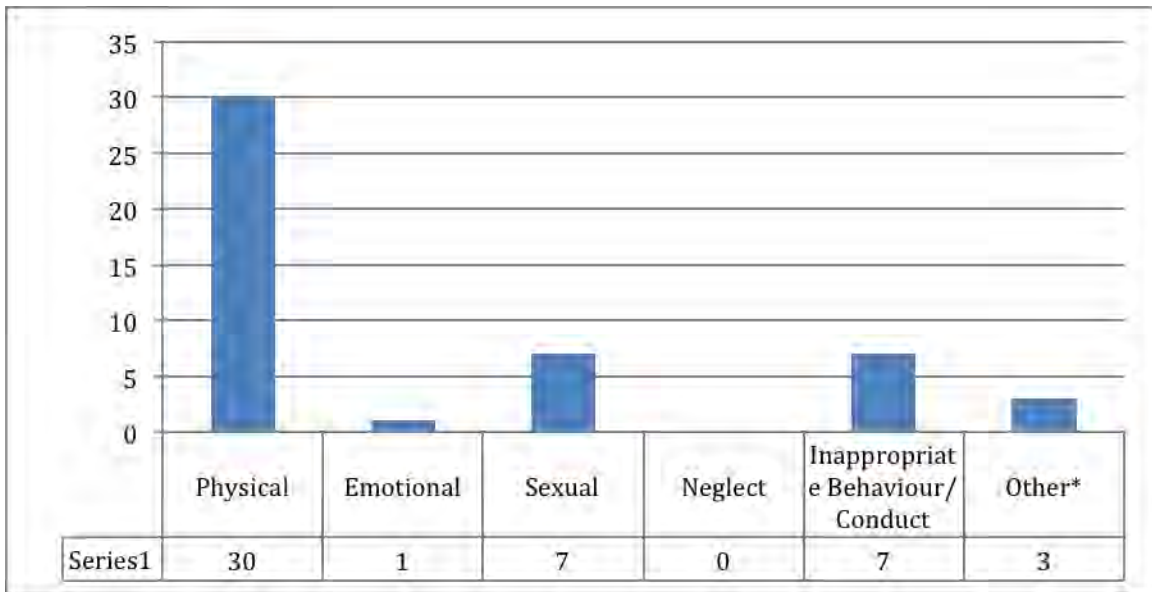
1.3 In addition to leading on investigations, the LADO and the service offer advice and guidance when there may be concerns about a person's conduct and when the threshold for a formal investigation has not been met. This has often ensured that advice and guidance has been given to staff when there are low level concerns and it is possible that it might have contributed to the reduction of referrals to the LADO.

1.4 The revised Working Together makes it clear that if an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because the person poses a risk of harm to children, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason. In order to ensure there is compliance with this, referral to DBS is recommended, if appropriate at the conclusion of the investigation and the LADO is involved in coordinating referrals to DBS.

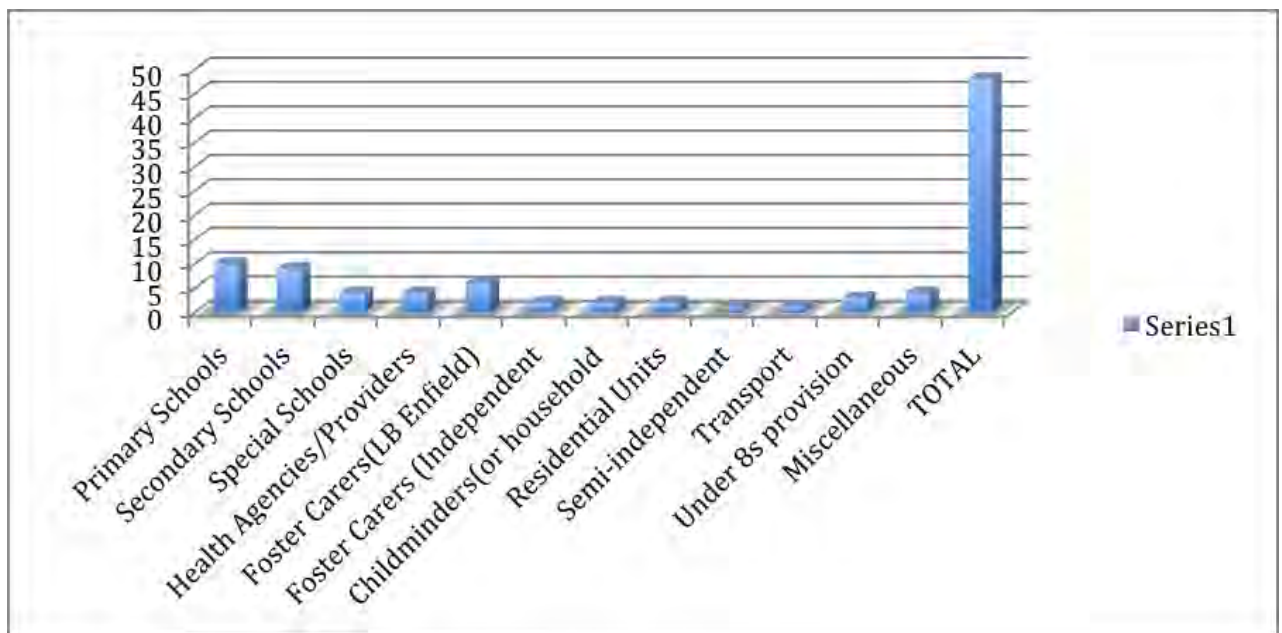
1.5 The approach we have adopted in Enfield has been effective and robust. The LADO and the CP Chairs/IROs have over a long period of time, developed their knowledge and expertise and effective working relationships with partner agencies. An allegation may relate to a person who works with children who has: behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

1.6 The LADO role applies to paid, unpaid, volunteer, casual, agency and self-employed workers. They capture concerns, allegations or offences emanating from outside of work, as well as within a person's paid or unpaid role working with children.

2. **BREAKDOWN OF ALLEGATIONS**



\*Other –referrals were made to the LADO when there were concerns about a professional or volunteer outside work but raised concerns about their suitability to work with children.





Category	Physical	Emotional	Sexual	Neglect	Inappropriate Behaviour/conduct	Other*	Total
Primary Schools	8				1	1	10
Secondary Schools	6		1		1	1	9
Special Schools	4						4
Health Agencies/Providers			3		1		4
Foster Carers(LB Enfield)	5	1					6
Foster Carers (Independent and other LAs)	1				1		2
Childminders(or household members)	1		1				2
Residential Units	1				1		2
Semi-independent providers					1		1
Transport	1						1
Under 8s provision	3						3
Miscellaneous			2		1	1	4
<b>TOTAL</b>	<b>30</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>7</b>	<b>3</b>	<b>48</b>

2.1 The total number of allegations between 1.04.2015 and 31.03.2016 which met the threshold for LADO involvement was 48. The outcomes are as follows:

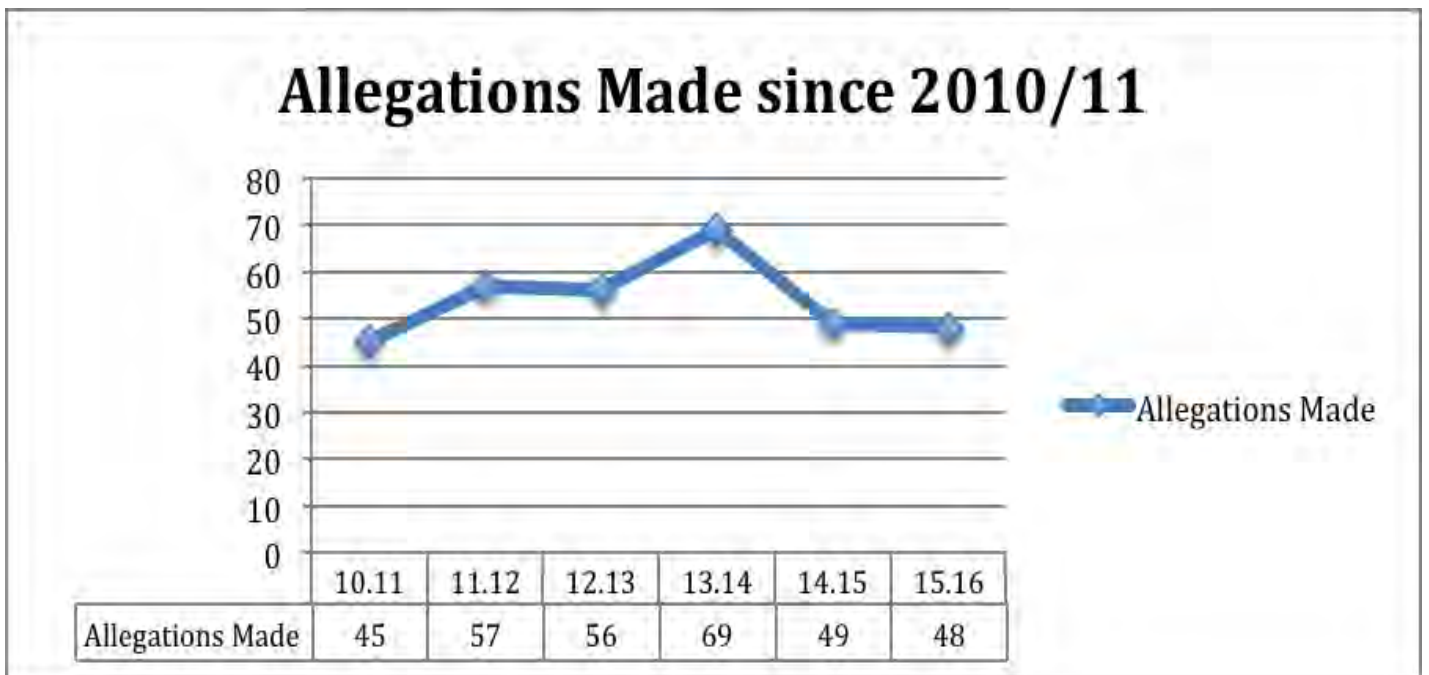
- 26 allegations were unsubstantiated (approximately 54%)
- 12 allegations were substantiated (approximately 25%)
- 6 allegations were unfounded (approximately 13%)
- 4 allegations are still being investigated (approximately 8%)

There were no malicious allegations.

2.2 One of the above allegations is a historical one and the police have charged the individual. There is no trial date as yet. In a further historical allegation (not included in the above figures), the alleged victim lives abroad and the allegation is in relation to a professional who is no longer alive.

In addition to the above 48 allegations, there have been approximately 70 consultations with the LADO, where the threshold for LADO intervention had not been met, and advice was offered on managing low level concerns. This activity had not previously been captured in a systematic manner and a system has now been put in place to record this activity and report. A significant number of the consultations relate to incidents when school staff need to use positive handling (under section 93 of the Education and Inspection Act 2006). In these circumstances, the LADO will evaluate the information in consultation with the Head and the police and investigate in circumstances when restraint has not been appropriate.

**2.3 COMPARISON TO PREVIOUS YEARS**



2.4 The number of allegations in the last two years has been fairly consistent. There has been an increase in sexual abuse allegations, from two in 2014-15 to seven in 2015-16. This may be explained in the context of recent media coverage around historical sexual abuse, although only one of the referrals relates to historical sexual abuse.

2.5 Three professionals were dismissed from their employment. In addition, four locum/supply staff had their placements terminated following allegations about them.

2.6 Sources of referrals include direct contact from young people and parents, police, children’s social care schools, the SPOE, partner agencies, OFSTED and other local authorities.

**3. OTHER LADO RELATED ACTIVITIES**

3.1 The LADO is responsible for coordinating referrals to DBS and responding to DBS and relevant Freedom of Information Requests.

**4. TRAINING**

4.1 Training is an integral part of staff development and an awareness raising and feedback from these training sessions has been consistently positive. The LADO has delivered the following training/workshops during 2015/2016:

- In house foster carers (two sessions a year)
- Fostering Service
- Leaving Care Service
- Providers' Coffee Morning
- Contributed to designated teachers' training with specific reference to LADO issues and processes (three times a year)
- Managing allegations training for LSCB agencies. (two sessions)
- Further training will be delivered over the forthcoming year and is included in LADO work plan for 2016 – 2017.

## 5. REVIEW OF THE WORK PLAN 2015-2016 AND WORK PLAN FOR 2016-17

ENFIELD LADO WORKPLAN 2015 – 2016			
Action	Responsibility	Timescale	RAG Status
Finalise and implement bespoke LADO referral form	Maria Anastasi	June 2015	
Complete the revision of the local “Managing Allegations” Protocol in line with national legislation and guidance	Maria Anastasi	July 2015	
Implement LADO process on ICS to improve management information process and systems and to improve LADO recording, monitoring and tracking of cases	Corporate IT and Maria Anastasi	2015/2016	
Dedicated LADO space on ESCB website with regular updates and guidance	Grant Landon ESCB Business Manager and Maria Anastasi	July 2015	
Design leaflets for parents and professionals	Maria Anastasi	June 2015	
Continue with developing and delivering awareness raising sessions within the statutory and voluntary sector and identify and give specific attention to agencies where there are few or no referrals	Maria Anastasi	Ongoing	
Collaborate with Adult Safeguarding to ensure that there are consistencies in practice in situations where there may be overlaps (particularly when dealing with young people who may be in settings which also cater for adults)	Maria Anastasi	Ongoing	



Action complete



Action taken but as yet not complete



Action requiring urgent attention/implementation

ENFIELD LADO WORKPLAN 2016 – 2017			
Action	Responsibility	Timescale	RAG Status
Implement LADO process on ICS to improve management information process and systems and to improve LADO recording, monitoring and tracking of cases	Corporate IT and Maria Anastasi	2016/2017	
Design leaflets for parents and professionals	Maria Anastasi	September 2016	
Continue with developing and delivering awareness raising sessions within the statutory and voluntary sector and identify and give specific attention to agencies where there are few or no referrals	Maria Anastasi	Ongoing	
Collaborate with Adult Safeguarding to ensure that there are consistencies in practice in situations where there may be overlaps (particularly when dealing with young people who may be in settings which also cater for adults)	Maria Anastasi	Ongoing	
Interviews of semi-independent providers as part of the tendering process	Access to Resource/Maria Anastasi	September 2016	

**APPENDIX A**

**Key contacts for Enfield**

Local Authority Designated Officer (LADO)	0208 379 2746/2850
Police Child Abuse Investigation Team (CAIT)	0208 733 5139
Single Point of Entry (SPOE)	0208 379 5555
Emergency Duty Out of Hours Social Worker	0208 379 1000
Local Safeguarding Children Board	0208 379 2767

**Key publications**

“Working Together to Safeguard Children” (March 2015)

“Keeping Children Safe in Education” (July 2015)

“London Child Protection Procedures”

“Protocol for the Management of Allegations of Abuse Against an Adult working with Children” (ESCB 2015)



## Safeguarding and Quality Assurance Service

### IRO Annual Report 2015/2016

<b>Author</b>	Maria Anastasi Deputy Head of Safeguarding	<b>Classification</b>	OFFICIAL - PUBLIC	<b>Date of First Issue</b>	31.08.2016
<b>Owner</b>	Anne Stoker Head of Safeguarding	<b>Issue Status</b>	Approved 31 <sup>st</sup> August 2016	<b>Date of Latest Re- Issue</b>	
<b>Version</b>	0.1	<b>Page</b>	1-18	<b>Date of next review</b>	1.05.17

<b>Contents</b>	<b>Pages</b>
<b>1 Purpose of service and legal context</b>	<b>3</b>
<b>2 Role and function of the Service</b>	<b>4</b>
<b>3 Professional Profile of the IRO Service</b>	<b>5</b>
<b>4 Activity and Key Performance Indicators</b>	<b>6 - 11</b>
<b>5 Local Authority Designated Officer (LADO)</b>	<b>12</b>
<b>6 Management Oversight, Quality and Dispute Resolution Process</b>	<b>13</b>
<b>7 Achievements in 2015-16</b>	<b>14</b>
<b>8 Review of the 2015/16 annual action plan and planned developments and key priorities 2015/16</b>	<b>15 - 16</b>
<b>9 Appendix 1 – case examples</b>	<b>17 - 18</b>



## **1. Purpose of Service and Legal Context**

- 1.1 The Annual Independent Reviewing Officer (IRO) report is produced by the Children's Safeguarding and Quality Service which sits within the Children's Services division of Enfield Council it has been approved for publication by Director of Children's Services management team (DMT). The report provides quantitative and qualitative evidence relating to the IRO Service within the Local Authority as required by statutory guidance. This report should be read in conjunction with the Enfield Local Authority Designated Officer (LADO) annual report.
- 1.2 Independent Reviewing Officers (IROs) were introduced nationally to represent the interests of looked after children. Their role was strengthened through the introduction of statutory guidance in April 2011. The Independent Review Officers (IRO) service standards are set within the framework of the updated IRO Handbook, Department for Children, Schools and Families (2010) and linked to revised Care Planning Regulations and Guidance which were introduced in April 2011.
- 1.3 This report identifies good practice as well as highlighting areas for development in relation to the IRO function. The responsibility of the IRO is to offer overview, scrutiny and challenge with regard to case management and regularly monitoring and following up between Reviews as appropriate. The IRO has a key role in relation to the improvement of Care Planning for Looked After Children (LAC) with particular emphasis upon challenging drift and delay.
- 1.4 In Enfield the IROs are also responsible for chairing Child Protection conferences, complex Child Sexual Exploitation strategy meetings, Disruption Meetings and final reviews of Supervision Orders. The Service Manager is also the LADO and the service provides a duty service to primarily support the LADO function. In addition the report provides an overview of the other activities and functions of the Children's Safeguarding Quality Service including information on the performance of the unit in a range of responsibilities.
- 1.5 The service has additional responsibilities which are not reported on within this document this includes the role of the Principal Social Worker and coordinating the functions of the Enfield Safeguarding Children Board (ESCB)
- 1.6 This report includes some historical analysis and the most current up to date information from 2015-2016.

## 2. Role and Function of the Service

2.1 The Service promotes continuous improvement in safeguarding performance and service delivery and is committed to achieving the best outcomes for all children and young people in Enfield, particularly the most vulnerable, such as those children who are looked after and those subject to Child Protection Plans.

2.2 The Service has an independent role to ensure that all children, whatever their background, receive the same care and safeguards with regard to abuse and neglect.

2.3 The Safeguarding Service is responsible for the following statutory functions:

- Convening and chairing of child protection conferences
- Convening and chairing of reviews for looked after children
- Convening and chairing of reviews for children placed for adoption
- Convening and chairing of complex abuse meetings
- Convening and chairing the final review for Supervision Orders
- Carrying out the LADO (Local Authority Designated Officer) functions in respect to allegations against staff and volunteers
- Chairing disruption meetings

2.4 In addition to the above the Service has responsibility for participation of children and young people including promoting MOMO (see page 11 for details about MOMO).

The Service has representation in the following meetings:

- MAPPA (multi-agency public protection arrangements)
- Placement Panel
- CDOP (child death overview panel)
- MASE (multi-agency sexual exploitation) police led meeting
- Risk Management Panel
- Participation and Kratos (Children in Care Council) meetings
- Corporate Parenting Panel
- Strategic and Operational Signs of Safety Steering groups

2.5 The statutory Independent Reviewing function of the Service is core business, meeting the Government's requirements and performance indicators, but the scope of the service is far wider than this. The IROs chair child protection conferences which strengthen continuity of care planning and promote sustained professional relationships for children and young people. The IRO child protection conference chair becomes the LAC reviewing officer should a young person need to come into the care system.

2.6 The service has additional responsibilities which include the role of the Principal Social Worker and coordinating the functions of the Enfield Safeguarding Children Board (ESCB) that are not reported on in this document. The Head of Service is also the named Child Sexual Exploitation lead, Signs of Safety lead and the Principal Social Worker.

### **3. Professional Profile of the IRO Service**

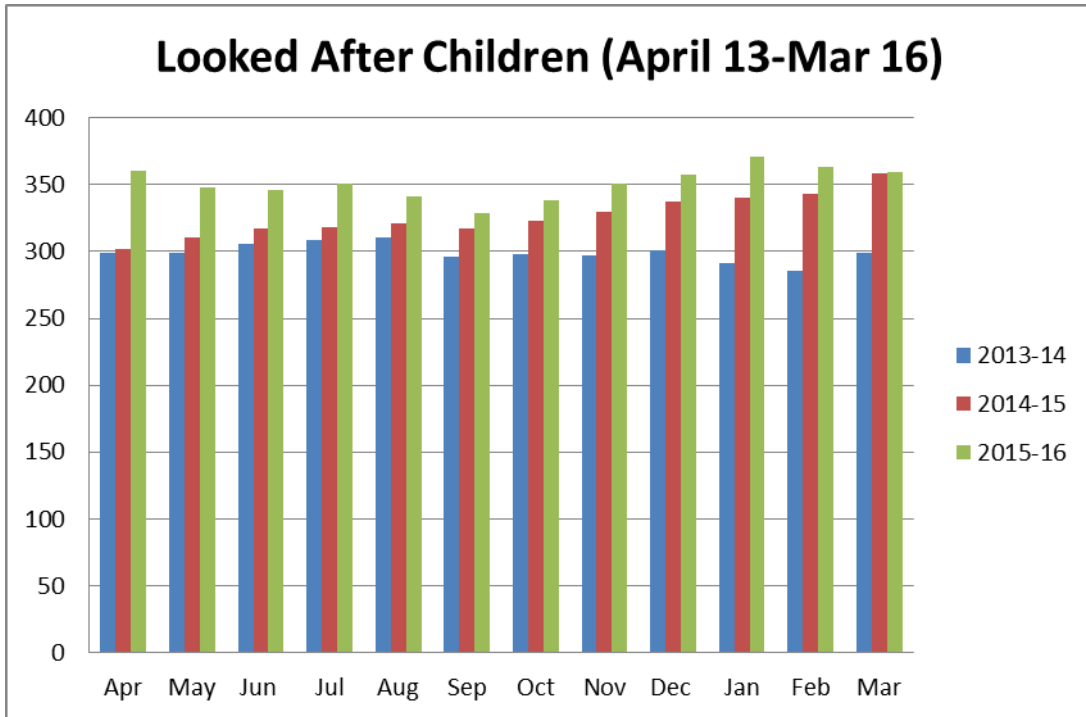
- 3.1 Responsibility for the activity and development of the Service lies with the Head of Safeguarding, Quality and Principal Social Worker who reports directly to the Director of Children's Services.
- 3.2 The direct link to the ESCB presents the Service with a key role in the analysis of inter-agency performance monitoring and quality assurance activity.
- 3.3 The current staffing structure includes:
- Head of Service, Quality and Principal Social Worker
  - Service Manager and LADO
  - 7 . 5 Independent Reviewing Officers (6 full time and 3 part-time)
  - 1 ESCB Business Manager with 3 support staff (2 fulltime equivalent)
  - 1 Signs of Safety Practice Coordinator and Project Manager
- 3.4 The IRO guidance makes it clear that an effective IRO service requires IROs who have the right skills and experience, working within a supportive context. The Enfield IROs have many years of relevant social work and management experience, and professional expertise.

The IROs are all at an equivalent level to Children's Social Care Team Managers in Enfield. The service is appropriately diverse.

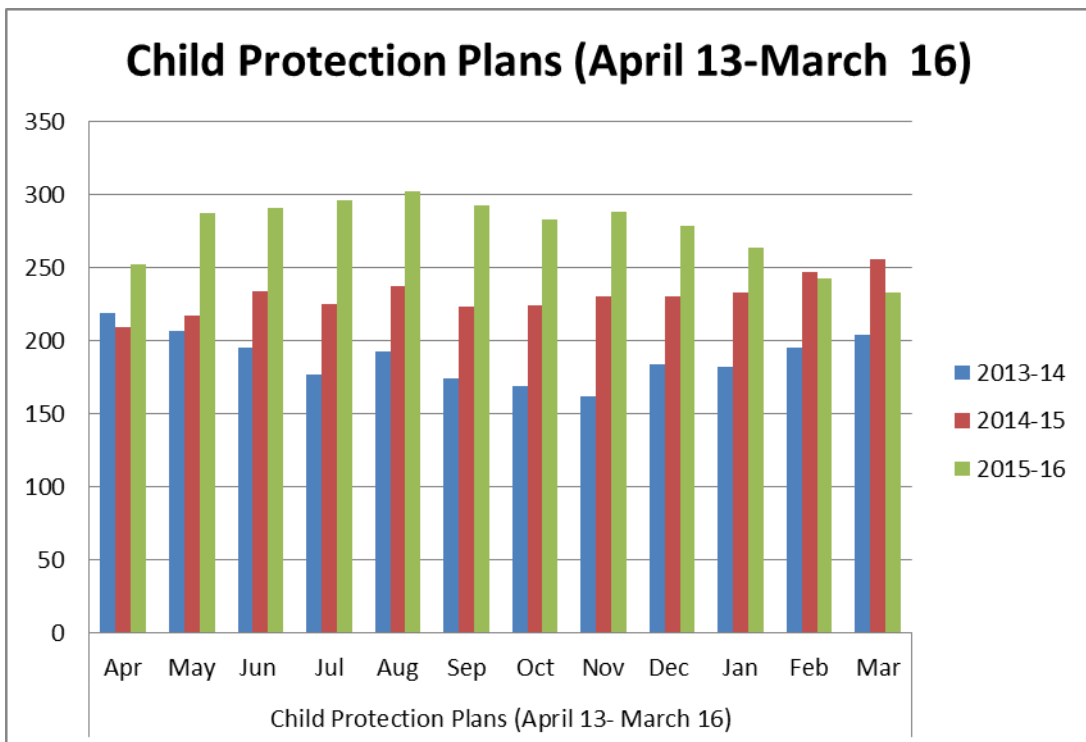
**4. Activity and Key Performance Indicators**

**4.1 Looked After Numbers and Child Protection**

**Looked After Children (April 13 - March 16)**



**Child Protection Plans (April 13 - March 16)**



- 4.1.1 The charts above provide the numbers of children subject to a Child Protection Plan (CPP) and Looked After (LAC) at the end of each month since April 2013.

2015/16 saw an increase in children subject to CP plans in the first half of the year peaking at **302** in August 2015. There has been a steady decrease month on month from November 2015 with **233** children subject to plans at the end of March 2016. The decrease from August 2015 to March 2016 is significant at 23%. This may have been impacted by the bulge in child protection referrals received in the first half of the year many of which were linked to child sexual exploitation (CSE).

A number of factors have impacted upon the reduction of children subject to child protection plans. Firstly the partnership overseen by Enfield Safeguarding Children Board has embraced Signs of Safety (SoS) which is an internationally recognised model for direct work with children and families. It is an outcome-focused, strengths-based model with a robust risk management framework & includes a range of principles, processes and tools to guide the work. Secondly the local specialist CSE team became operational in July 2015 and by the end of the year referrals were being held within this team with strong child in need plans in place thus reducing the need for child protection plans.

The number of LAC has had a small rise and fall during 15/16 but remains approximately the same at the end of March 2016 (359) as it was in March 2015 (358). There was a significant increase in the LAC population 3 years ago and this has remained consistently high over the last 2 years.

- 4.1.2 There were 9 young people remanded in Local Authority Care and 21 young people remanded in secure estates throughout the year.
- 4.1.3 The number of unaccompanied asylum seeking children (UASC) looked after at the 31<sup>st</sup> March 2016 was **69** this is a significant area of pressure as there were **49** UASC looked after children at the 31<sup>st</sup> March 2015, this represents a 40% increase over the year.
- 4.1.4 There were **60** children that returned from care to parents or relatives with parental responsibility during the year 15/16 (this does not include Special Guardianship Orders or Child Arrangement Orders). There were **69** children returned during 14/15. The decrease could be attributed to the changing characteristics we are seeing in the LAC population such as increase in UASC, and more young people presenting with complex and challenging behaviours.
- 4.1.5 It is good to see that the stability of placements for children looked after has increased from 64.4% in 14/15 to 69.7% in 15/16. The IROs contribute to this by ensuring robust plans are in place and intervening early when placements are showing fragility.

## 4.2 Child Protection and Looked After rates per 10,000

4.2.1 Rates per 10,000 are used as a method of benchmarking local authorities CPP LAC numbers against each other, using a more comparable method than simply comparing actual numbers. Figures are expressed as a ratio and are calculated by dividing the local authorities' actual numbers by its total 0-17 child population estimate sourced from the Office of National Statistics (ONS). The 2 charts which follow benchmark Enfield's rates per 10,000 of Children subject to a CPP and rates per 100,000 of LAC against average rates for its 3 comparator groups of Outer London, Statistical Neighbours and England as a whole. The data was not available for 15/16 at the time of writing this report.

### Rate of CPP per 10,000 population as at 31<sup>st</sup> March of each year for the last 3 years

	2012/13	2013/14	2014/15
Enfield	28.3	25.1	31.0
Outer London	31.9	35.1	38.3
Statistical Neighbours	32.8	44.9	49.5
England	37.9	42.1	42.9

### Rate of LAC per 10,000 population as at 31<sup>st</sup> March each year for the last 3 years

	2012/13	2013/14	2014/15
Enfield	28.3	25.1	44
Outer London	31.9	35.1	47
Statistical Neighbours	32.8	44.9	79
England	37.9	42.1	60

4.2.2 The charts above show Enfield has historically had lower than average rates (and therefore numbers) of children subject to Child Protection Plans (CPP) and LAC compared to various local authority comparator groups, and continues to do so. We are expecting to see a drop in the number of CP plans for 2015/16 and the LAC population is expected to remain the same.

4.2.3 At the end of March 2016, mapping has shown that the 233 children subject to a Child Protection Plan lived in the following wards:

**CPP per Ward as at 31 March 2016**

Bowes	2
Bush Hill Park	5
Chase	15
Cockfosters	1
Edmonton Green	14
Enfield Highway	30
Enfield Lock	16
Grange	4
Haselbury	10
Highlands	1
Jubilee	10
Lower Edmonton	23
Palmers Green	3
Ponders End	9
Southbury	16
Southgate Green	4
Town	2
Turkey Street	23
Upper Edmonton	27
Winchmore Hill	1
Out of Area	17
<b>Grand Total</b>	<b>233</b>

4.2.4 At the end March 2016, of the 233 children subject to CPP:

- 58% were male, 41% female and 1.% unborn
- 92% had a category of either Neglect or Emotional Abuse (52% and 40% respectively)
- 2% had a category of physical abuse, 2% sexual and 4% multiple categories
- 7% (17 children) were recorded as being a Child with a Disability

### 4.3 Child Protection Conferences and Key Performance Indicators

**CPP Activity 2015/16**

Becoming Subject of a CPP in the year	426
Ceasing to be the Subject of a CPP in the year	361
Subject of a CPP at 31 March	233

**CPP Conferences 2015/16**

Initial Conferences	337
Review Conferences	830

**CPP 2 Years or More 2015/16**

Total subject to CPP for 2 years or more	3
--	---

**CPP For A Second Or Subsequent Time Between 01/04/2015 and 31/03/2016**

CP In Last Year	336
Previously CP within 2 years (01/04/2014 to 31/03/2016)	14
Percentage: 14 / 336	4.2%

<b>CP Reviews Within Timescales</b>	<b>2014/15</b>	<b>2015/2016</b>
Reviews within the year	161	
Reviews in Timescale	161	155
Percentage	100%	91.7%

- 4.3.1 Performance for the indicator CPP 2 years or more has been consistently good over the last few years, good performance is typified by a lower number. Performance at the end of February 2015 was 2.3%. At the end of March 2016, this was 0.9%. This is a significant decrease and would indicate that we are more robust in our planning and that the Public Law Outline process which is usually triggered at the second CP conference review is a contributory factor in avoiding drift in cases.
- 4.3.2 Performance for the indicator CPP for a second or subsequent time has significantly improved. At the end of February 2015, the percentage was 20.8%. At the end of March 2016, this was decreased to 4.2% (14 children). This demonstrates that there is effective work during the period that children are subject to CP plans to avoid repeat CP plans and when there is evidence that either changes to safeguard children are not made or are not sustained, we are more robust in escalating to Public Law Outline process. Another contributory factor is that the stepping down process from CP to CIN is effective.
- 4.3.3 Performance for the indicator CP reviews within timescales has dropped from a consistently excellent performance of 100% to 91.7%. This has been audited and strategies have been put in place to ensure this is rectified by bringing forward deadlines for dates of conferences.

**4.4 Looked After Reviews and Timescales**

<b>LAC Reviews Within Timescales</b>	<b>2014/15</b>	<b>2015/16</b>
Reviews within the year	910	953
Reviews in Timescale	890	948
Percentage	98%	99%

The percentage of Looked After Children reviews completed within timescale continues to be high, as shown in the table above. IROs completed some reviews in a series of meetings to ensure the relevant people were involved and the meeting remained child focused and friendly.



## **4.5 IRO case loads**

- 4.5.1 The IRO Handbook recommends that case loads for IROs need to be between 50 and 70 Looked After Children cases. The size of caseload alone does not indicate the overall workload for each individual IRO as individual roles and responsibilities vary within the team.
- 4.5.2 The IRO guidance puts an emphasis on ensuring that the size of the case load enables IROs to have sufficient time to provide a quality service to each LAC including, amongst a number of responsibilities, monitoring drift, undertaking follow up work after the review, consulting with the social worker following a significant change and meeting with the child before the review. At the end of March 2016, 233 children were subject to Child Protection Plans and 360 children were looked. The average case load was approximately 48 LAC cases per IRO. In addition, IROs in Enfield chair child protection conferences.

## **4.6 Participation (including MOMO)**

- 4.6.1 A key role of the Service is to seek regular feedback from children, young people, families and carers about their experience in care and also the difference the IRO has made to the lives of the children with whom they work. This information is collated and used to drive improvement.
- 4.6.2 Ensuring LAC are able to participate as fully as possible in planning and reviews remains a key priority for the Service and as a result there has been a significant improvement in this area. This has included more children being supported to attend their reviews, and more ways children can participate. There is still room for improvement especially in relation to children and young people with additional communication skills.
- 4.6.3 Participation figures for Looked After Children in their reviews has been consistently high over a long period of time. Data as at 31<sup>st</sup> March 2016, submitted to DfE, confirms that 95.4% of Looked After Children who were reviewed during 2015-16 participated in all their reviews held during the year. (This excludes Looked After Children under the age of four)
- 4.6.4 Enfield Children's Services have recently procured MOMO app (Mind of My Own) to help children and young people create a statement of their views, wishes and feelings. The implementation plan is led by the Participation Steering group. The plan is to use the MOMO app with children in care and care leavers from May for a six month period and then roll out widely to children subject to Child Protection Plans and Child In Need Plans.
- 4.6.5 MOMO will enable the local authority to provide quarterly and annual reports on the uptake of the service.

## 5 Local Authority Designed Officer (LADO)

5.1 The Enfield LADO is the Service Manager of the Safeguarding and Quality Service. The role of the LADO is to provide management and overview of cases where there are allegations against staff and volunteers who work with children from all agencies.

The LADO ensures that advice and information is given to Senior Managers within organisations and monitors the progress and timescales of these cases. The LADO ensures that there is a consistent approach to the application of policy and procedures, when managing allegations, and maintains a secure information database for all allegations.

All referrals are considered in line with Pan London Child Protection procedures and follow the local Enfield protocol, which was updated in September 2015.

5.2 The total number of allegations between 1.04.2015 and 31.03.2016 which met the threshold for LADO involvement was 48. The outcomes are as follows:

- 26 allegations were unsubstantiated (approx. 54%)
- 12 allegations were substantiated (approx. 25%)
- 6 allegations were unfounded (approx. 13%)
- 4 allegations are still being investigated (approx. 8%)

There were no malicious allegations.

5.3 In addition to the above 48 allegations, there have been approximately 70 consultations with the LADO, where the threshold for LADO intervention had not been met, and advice was offered on managing low level concerns. This activity had not previously been captured in a systematic manner and a system has now been put in place to record this activity and report.

5.4 Workshops and training around managing allegations has been provided to several services/agencies, to ensure compliance with national and local procedures and guidance and to increase confidence in dealing with these allegations. The LADO has attended London LADO network meetings.

5.5 A LADO annual report (2015-16) has been completed which provides more detailed information about the work of the LADO and a work plan which can be found on the ESCB website.













## 6 Management Oversight, Quality Assurance and Dispute Resolution Process



- 6.1 All children looked after and children subject to child protection plans are allocated a designated IRO from the moment they enter the system with the key aim that the allocated IRO will remain consistent, until the child is no longer looked after or subject to a Child Protection Plan.
- 6.2 The quality and effectiveness of the IRO service is closely monitored through supervision, case file audits, together with performance reporting which highlights good practice as well as any areas of concern, therefore enabling prompt action to rectify any poor IRO performance.
- 6.3 The statutory guidance states that operational social work managers must consider the decisions from the review before they are finalised. This is due in part to the need to ensure any resource implications have been addressed. Managers have five days to raise any queries or objections. This rarely happens which would indicate that managers are generally satisfied with the decisions made at the review.
- 6.4 One of the key functions of the IRO is to resolve problems arising out of the care planning process. IROs within Enfield continue to have positive working relationships with social workers and team managers of the children for whom they are responsible. Where problems are identified in relation to a child's case for example in relation to care planning, resources or poor practice, the IRO will, in the first instance, seek to resolve the issue informally with the social worker or the social workers manager. If the matter is not resolved in a timescale that is appropriate to the child's needs, the IRO will escalate the matter accordingly following the local dispute resolution process.
- 6.5 Staff together with IROs recognise that any problems or concerns regarding care plans need to be addressed initially through negotiation before instigating the escalation resolution process.
- 6.6 The escalation process gives weight and strength to the role of the IRO and emphasises the need for the IRO to be accountable for the recommendations that are made at reviews. IROs will refer to the process when actions or recommendations have not been followed up on behalf of a child/young person or where care plans have been delayed and whilst in the main the majority are dealt with at Social Worker/Team Manager level, there are some examples of where there has been escalation to Heads of Service. There has not been the need to escalate to the Assistant Director or Director as issues have been resolved at an earlier stage.
- 6.7 As part of the monitoring function IROs have a duty to monitor the performance of the local authority's function as a corporate parent and identify any areas of poor practice. This includes identifying patterns of concern emerging not just around individual children but also more generally in relation to the collective experience of looked after children and the services they receive. Equally important, the IROs recognise and report on good practice.
- 6.8 See case examples of IRO intervention and the impact of their role by reading the 2 case studies in Appendix 1

## **7 Achievements in 2015-16**

- 7.1 The last 12 months have been challenging as always but the Service has continued to make significant steps in implementing and maintaining improvements in practice.
- 7.2 Despite some turnover of staff in the last few years, due to staff retiring or leaving, the service continues to maintain very high standards and performing consistently well. Members of the service are very experienced and highly skilled and deliver an excellent service to children subject to child protection plans and children who are looked after.
- 7.3 The Service has been at the forefront of the development of the Signs of Safety (SoS) model in Enfield and are in the process of piloting this model for chairing child protection conferences. The Head of the Service is the lead officer for this project and the Service Manager and one of the IROs are members of the Strategic Steering Group. An Operational Steering Group has recently been set up following the recommendation of the Service, to consider the practical and operational implications of the implementation of this model.
- 7.4 All the IROs have attended the two day SoS training and in addition the bespoke one day training for CP Chairs.
- 7.5 The Service will be evaluating the pilot with the view to fully implementing the model by December 2016.
- 7.6 The Service has collaborated with KRATOS to develop a Child Friendly Protection Plan, which is a tool Social Workers will use with children subject to child protection plans. This complements the Signs of Safety model for conferences and a further opportunity to ensure the child's voice is heard.
- 7.7 The Service continues to attend MAPPA, MASE and CDOP meetings and members of the service are involved in the Participation Steering Group and have strong links with KRATOS.
- 7.8 Enfield Children's Services have procured MOMO (Mind Of My Own), a modern, tech- savvy way to engage with young people. It makes it easier for them to express their views and have a say in decisions about them. The app gives 8-17yr olds and care leavers the confidence and ability to express their needs. The MOMO service delivers their views to you, pushing their wishes and feelings into the heart of decision making. The IRO's have a key role in promoting the use of MOMO.

## 8 Review of the 2015/16 annual action plan and planned developments and key priorities for 2016/17

ACTION PLAN 2015/16					
Area for development	Action	Lead officer	Timescale	RAG Status	Outstanding actions for 16/17
Implementation of the Ofsted 2015 improvement plan. Ensuring that the annual reports of the Local Authority Designated Officer (LADO) and the independent reviewing officer (IRO) meet the requirements of the relevant statutory guidance, provide a critical analysis of their respective services and identify specific areas for improvement.	Re write and publish 2014/15 IRO report	Anne Stoker Head of Safeguarding	April 2015 		
	Write and publish 2014/15 LADO report	Maria Anastasi LADO	April 2015		
Implement strengthening family's model creating a more constructive culture around child protection organisation and practice – particularly through the implementation of Signs of Safety.	Develop an implementation plan to be presented and agreed at OMG Present to ESCB and begin to plan into place with full cooperation of partners	Anne Stoker Head of Safeguarding	June 2015		
			September 2015		
Maintaining the high levels of participation in LAC reviews and improving where possible the numbers of children and young people that participate in Child Protection conferences.	Further embed the use of viewpoint by IROs championing its use  Increase the number of young people supported to chair their own LAC reviews  Include the above as stretch targets within IROs individual PARs	Maria Anastasi Deputy Head of Service and IROs	April 2015 onwards		Viewpoint decommissioned in favour of MOMO which was launched in 2016. Targets included in 2016/17 PARs
					
					
Embracing the Enfield 2017 transformation agenda while fulfilling the statutory requirements of the service.	Identify key areas that will require specific specialist support and ensure all statutory functions are met	2017 Leadership Team Tony Theodoulou Assistant Director Children's Services Anne Stoker Head of Safeguarding	April 2015 and ongoing throughout the year		
Implement findings from the many audits that review children subject to child protection plans and those looked after and continue to have a key role in the work of the ESCB and specifically the work of the OMG.	Review sections of audits relating to the service	Anne Stoker Head of Safeguarding Maria Anastasi LADO, IROs	October 2015		
Ensure IROs leadership and competencies remains strong and they meet the standards of the new knowledge and skills framework.	IROs to attend training and development workshops New knowledge and skills set to be used when setting PARs	Maria Anastasi	Ongoing		KSS not yet published this will be carried forward to 2016/17
Increase income generation where possible through traded services and charging for training	Review the budget monitor IROs caseloads as income generated may be offset against service pressures				
Include Kratos in the review of the effectiveness of the IROs	Develop a framework to include Kratos in the scrutiny of the IRO service				Child friendly plan developed and review of service planned in

					2016/17
Update the ESCB Managing Allegations Protocol, reviewing and embedding LADO processes.	Update the protocol Launch and embed use of the LADO referral form Explore use of liquid logic to case manage LADO records Continue to deliver multi-agency training re the management of allegations	Maria Anastasi Deputy Head of Safeguarding			
Embed the process from the new Child Sexual Exploitation multi-agency protocol	Review processes and clarify the roles and responsibilities of the IRO				

**RAG STATUS****Action complete****Action taken but as yet not complete****Action requiring urgent attention/implementation****8.1 The key priorities and areas of development for 2016/17**

- Evaluating the pilot the Signs of Safety Model, and fully implementing it by December 2016
- Maintaining high LAC participation and improving CP conference participation by further embedding the use of MOMO and increasing the support to young people to enable them to chair their own looked after reviews as appropriate.
- Embedding the Enfield 2017 transformation agenda while fulfilling the statutory requirements of the service.
- Continue to increase the number of young people chairing their own reviews
- IROs to attend social work knowledge and skills workshops over the forthcoming year in order to identify learning and development needs specific to the role.
- Commissioning KRATOS to audit the quality of LAC reviews

All case studies below are provided in very broad, slightly changed terms to preserve anonymity.

### **CASE STUDY 1: Importance of Social Worker and independent reviewing officer discussing and reflecting on the local authority plans for children between reviews.**

#### **Background**

The young person is one of a number of siblings either in foster care or adopted. She had a number of placements and the concern was whether she would settle in foster care in spite of pressure by the older siblings and mother to retain loyalty to the past family life resulting in upsetting and unsettling contact meetings for the young person.

#### **Main areas of concern/risk:**

- Neglect
- Poor parenting and inability to prioritise needs of the children
- Sexual abuse

#### **Intervention**

The allocated social worker and Independent Reviewing Officer had regular discussions between reviews to agree the plan by the local authority to support the foster placement through the intervention of the local CAMHS service and covering the costs of two overnights a week at the young person's boarding school.

The foster carer was unable to continue as she had acute personal issues. There was agreement that a local placement should be found to allow the young person to continue at the same school and CAMHS.

Direct work was undertaken by the allocated social worker with the young person to reflect on why the placement could not continue and to look forward to the next placement.

#### **Outcomes**

The local authority, although prepared to consider a bridging placement to ensure that the right foster carers for the young person could be found, identified a potentially long term foster placement close to the young person's boarding school and other services. Contact with mother has not been increased and continues to be supervised. Contact with the older siblings is under review and will only be considered when the young person is settled in placement. The foster carers talk positively and warmly about her. The boarding school report that she is calmer and less likely to embellish incidents.

#### **Child young person's views re outcomes**

The young person is happy in placement and, although only there for a relatively short time, is considered to be part of the family.

## CASE STUDY 2: Importance of legal planning and contingency planning in child protection plans

### Background

Three children were subjects of a child protection plans. The concerns were around mother's drinking and general neglect.

Main areas of concern/risk:

- Alcohol abuse
- Poor parenting and inability to prioritise needs of the children
- The eldest boy being beyond her care and control and being at risk from associates in the community and he admitted to smoking cannabis.

### Intervention

The Independent Reviewing Officer who chaired the Child Protection Conferences set a timescale by which the family would either agree where the children would live or for the local authority to take legal action.

The local authority initiated the Public Law Outline and assessments were started. Care proceedings were then initiated. The children were placed with an elder sister.

The independent reviewing officer met with all 3 children and the older sister and escalated concerns about the arrangements in place. The older sister needed significant practical support which was then provided by the local authority. The middle child wished to be placed with a long term foster carer in the local area. The eldest boy wanted to live with a relative out of borough and the youngest wanted to remain with his relative in Enfield.

The independent reviewing officer consulted with the CAFCASS Guardian and the children's mother.

### Outcomes

A close relative was assessed as a Special Guardian. The independent reviewing officer has made recommendations with regards to the support plan.

The eldest boy is placed with a relative outside of the borough and remains subject of an interim care order. The independent reviewing officer has made recommendations about how the placement be supported. The eldest boy has had difficulties in his school placement. The independent reviewing officer has recommended he be made the subject of a full care order at the final hearing. This view was supported by the CAFCASS Guardian.

The middle girl moved to an in-house foster carer in a planned way and has settled very well. The independent reviewing officer has supported that this be agreed as a long term placement.

### Child young person's views re outcomes

All three children are living where they wanted to and the youngest boy and girl are doing exceptionally well and are happy with the arrangements. The eldest boy continues to have difficulties with education, however the arrangements to stay with his relative continue and the placement is being supported by the local authority as this is where he wants to stay.



## OVERVIEW &amp; SCRUTINY COMMITTEE - 30.6.2016

**MINUTES OF THE MEETING OF THE OVERVIEW & SCRUTINY COMMITTEE  
HELD ON THURSDAY, 30 JUNE 2016****COUNCILLORS**

**PRESENT** Derek Levy, Abdul Abdullahi, Joanne Laban, Edward Smith and Nneka Keazor

**ABSENT** Katherine Chibah

**STATUTORY CO-OPTees:** *1 vacancy (Church of England diocese representative), Mr Simon Goulden (other faiths/denominations representative), Mr Tony Murphy (Catholic diocese representative), Alicia Meniru & 1 vacancy (Parent Governor representative) - Italics Denotes absence*

**OFFICERS:** Nicky Fiedler (Assistant Director, Public Realm, Environment), Andy Ellis (Scrutiny Officer), Stacey Gilmour (Scrutiny Secretary)

**Also Attending:** Councillor Daniel Anderson, Cabinet Member, Environment  
Councillor George Savva, Associated Cabinet Member, South East (observing)  
8 Friends of Parks representatives

**52****WELCOME & APOLOGIES**

The Chair welcomed attendees to the meeting, including Friends of Parks and other interested parties. Apologies for absence were received from Councillor Chibah and Statutory Co-optee Tony Murphy.

Apologies for lateness were received from Councillor Nneka Keazor. It was agreed that if Councillor Keazor arrived after the reasons for the Call-In had been heard, she could partake in discussions however, on this occasion she would not have the opportunity to vote on the decision.

It was noted that Councillor Michael Rye was substituting for Councillor Joanne Laban as she was leading on the Call-in item.

It was also noted that Councillor Dinah Barry was substituting in the absence of Councillor Chibah.

**53****DECLARATIONS OF INTEREST**

**OVERVIEW & SCRUTINY COMMITTEE - 30.6.2016**

No declarations of interest were put forward.

**54**

**CALL-IN REPORT:THE COUNCILS REVISED APPROACH TO THE FRIENDS OF PARK GROUPS**

The Chair invited Cllr Laban to present the Reasons for Call-In, summarised as follows:

- Lack of proper consultation with the Friends of the Parks Groups. It was felt that when a new agreement comes through it should be shown to both parties involved before a decision is made.
- It shows a low level of stakeholder engagement.
- The decision report shows no data from talks with Parks Groups; therefore it is not known what these groups thought of the proposals.
- The decision does not take into consideration smaller parks groups.
- The change in the number of voluntary hours per level does not take into account the size of the park or the difference in the membership of the groups.
- The decision states that friends of parks groups should log park issues via the website rather than their old form of communication with Officers, However, the new website has not yet been fully completed and there are complaints about its function, therefore it seems premature to go down this route.
- This decision has not been made in the true spirit of partnership.

The Chair invited Cllr Anderson to respond, summarised as follows:

- The changes had come about as a result of budget decisions back in February when it was agreed that a further range of budget savings would be necessary across the organisation.
- As a result of these savings it was agreed that from this year the Public Realm Improvement Team would see staff reductions and therefore Officer support to Friends of Park Groups would have to be reduced.
- The Officer's remit would be refocused on supporting funding bids, providing strategic support of volunteers and managing park improvement projects.
- Officers currently attend over 100 quarterly Friends group meetings per year. However this is no longer sustainable and it is proposed that the remaining Officer's role will be refocused as stated above.
- Moving forward the Council's proposals are aimed at maintaining the same outcomes, but it is about delivering them in a more efficient and effective manner.
- The work of the Friends of Parks Groups and all volunteers is very much recognised, respected and appreciated and it was hoped that the

**OVERVIEW & SCRUTINY COMMITTEE - 30.6.2016**

positive relationships between the groups, Councillors and Officers continues.

- The revised agreement maintains the spirit of the original agreement, but proposes delivering the same objectives through a different way of working, as indicated above.
- There has been engagement with the parks groups about the changes. All groups were written to and the proposals were discussed at the first round of introductory ACM meetings, to support the transition, which were held in late April/early May.
- It was appreciated that there were some concerns regarding the new agreement and we are keen to ensure that these concerns are listened to. It is an evolving and organic document and we will need to closely monitor how it is working over the next couple of months. If there are failings in any particular way these will be addressed.
- The decision also allows for future amendments to the Agreement if required and necessary.

Cllr Keazor arrived at this point of the meeting

The Chair invited Nicky Fiedler, Assistant Director, Public Realm, Environment to respond, summarised as follows:

- All of the groups were written to explaining the new approach in March 2016.
- They were also invited to a series of introductory area based meetings held on 27<sup>th</sup> and 28<sup>th</sup> April and 4<sup>th</sup> May.
- Further details were presented at these meetings about the new approach and the new Agreement and the groups were provided with the opportunity to feedback their views to Councillors and Officers during this period.
- Initial comments raised by the Friends of Parks groups at the ACM meetings were noted and addressed.
- Concerns regarding the reduction in staff had also been noted and we are currently trying to use the staff that we have to support the FOP groups in the best way possible.
- The Agreement retains the current three levels of Bronze, Silver and Gold, but the specific commitments for both the Council and Friends groups have been updated to reflect the revised approach.
- A few of the Friends groups have requested that the Council increases the volunteering target as a challenge to the groups to deliver more within their parks.
- All size groups, which ever level can now access the same level of funding. This provides equity across the piece.
- The ability to report park problems online has been available for a number of years and was a key part of the previous website's functionality. The new approach enables the Friends of the parks to report issues immediately, by assessing the same system Officers would use, therefore providing a more efficient and effective

**OVERVIEW & SCRUTINY COMMITTEE - 30.6.2016**

solution to all parties. Out of 120 issues reported per month, 90 are now submitted online.

- The key changes to the Agreement are:
  - (i) Maintaining Green Flag standard-not accrediting it;
  - (ii) Change in Officer support;
  - (iii) Not required to attend consortium meetings;
  - (iv) Increased funding

The Chair then invited the Committee to put forward any questions or comments, which were as follows:

- Cllr Rye re-iterated the reasons for the Call-In. These being: lack of consultation, the fact that the revised Agreement was not shown to the Friends of Parks Groups before it was signed off. No data from talks with the groups was included in the decision report and not enough notice had been given of the planned meetings.
- Nicky Fiedler responded and confirmed that the groups had received 28 days' notification from the invite to the actual meetings taking place, so there had been plenty of notice. There had been good attendance at the ACM meetings and as previously stated, concerns raised at these meetings had been discussed and addressed. However no further information had been received from the groups stating that they were not happy with the proposed amendments to the Agreement.
- Cllr Rye asked if the smaller groups had been engaged with. Nicky said that she did not have the exact figures for attendance, but all groups had been invited.
- Cllr Rye asked if there was a signing in register at the ACM meetings and were formal minutes taken. Cllr Anderson and Nicky agreed that there did need to be a formal register of those attending the ACM meetings, as well as a formal note of the discussions that take place. This would be arranged for future meetings. **Action: Nicky Fiedler**
- Cllr Levy commented that online problems were generic and not just relevant to this decision. It is not being said that the Friends of Parks Groups can only use the website to report any issues. Every park has Ward Councillors that can be contacted as well as the ACMs. That line of contact is always open.
- Cllr Laban asked whether the final Agreement had been shown to the Friends of Parks Groups before it was intended to be published and felt that it would have been in the spirit of the partnership for them to have seen it.
- Nicky advised that the proposed amendments were put forward at the initial meetings. However the actual document wasn't as, at that stage, it was still an evolving document.
- Cllr Anderson added that although this was a fair point raised by Cllr Laban, there had been a clear two month period between what was discussed at the meetings and what had ultimately been signed off.
- Cllr Smith commented that with Council resources becoming less and less the Voluntary Sector were becoming more and more invaluable,

**OVERVIEW & SCRUTINY COMMITTEE - 30.6.2016**

therefore it was important to engage and consult with them in the best way possible and to retain a true partnership spirit.

- Cllr Barry asked if anything had come out of the introductory meetings between the Friends of Parks Groups and the ACMs. What had the FOPGs asked for. Nicky advised that some groups had asked for an increase in the hourly commitment and this had been responded to in the Agreement.
- At no later than the first meeting of 2017/18 (preferably February 2017) it was agreed to invite the three ACMs and representatives from the Friends of the Parks Groups to attend to provide views on the revised approach to engaging and to see if there have been any further amendments to the Partnership Agreement since today's meeting.  
**Action: To come back to Overview & Scrutiny meeting no later than the first meeting in 2017/18 -Andy Ellis/Stacey Gilmour**

The Chair then invited the Friends of the Parks Groups to put forward any questions or comments, which were as follows:

- Will the Friends of the Parks Groups have the opportunity to work with the Council on a Management Plan? Nicky advised that Management plans are very resource intensive so unfortunately the Council could not commit to that. However, if a particular park or project requires a Management Plan then of course the Council would work in partnership with the Friends of the Parks Groups
- Can the Friends of the Parks Groups leave here tonight with the clearest impression that the Partnership Agreement as it stands is still up for discussion.
- Cllr Anderson responded that it is an evolving document so any concerns can continue to be addressed. He continued by saying that he wants to find a way whereby no group feels disenfranchised and it is therefore important to establish some pragmatic, common sense Agreement. If there are problems in some of the workings we will seek to address them within the scope we have.

The Chair asked Cllr Laban to summarise her position which was as follows:

- A better protocol is needed in Public Realm to ensure that we better engage and consult with our Partnership Groups.
- The report is not very well written as it does not include data from talks with Park Groups. We need to know what people thought, their comments, views etc.
- This decision questions the true spirit of partnership.
- There needs to be some sort of protocol for the twice yearly ACM meetings.

The Chair asked Cllr Anderson to summarise his position, which was as follows:

**OVERVIEW & SCRUTINY COMMITTEE - 30.6.2016**

- The more efficient approach is aimed at sustaining the same outcomes of the original Agreement and also provides opportunities, through a more strategic approach and the sharing of best practices, to develop further the successful partnership with the Friends and the Council. The revisions of the Agreement, and the new ways of working, will continue to ensure that the resources of both the Council and the Friends Group enable maximum benefit to our parks.

The Committee then voted on the decision:

Councillors Abdullahi and Barry voted in favour of confirming the decision.

Councillors Rye and Smith voted in favour of referral back to the Cabinet Member for reconsideration.

The Chair, Councillor Levy, utilized his casting vote in confirming the original decision. He stated that this followed careful consideration of the opinions of both the proponent, Councillor Laban, Councillor Anderson as Cabinet Member for Environment and officers. In conclusion Councillor Levy confirmed that he had not heard sufficient evidence to refer the matter back to the Cabinet Member for reconsideration.

**The Committee therefore AGREED TO CONFIRM THE DECISION.**

**55**

**ANY OTHER BUSINESS**

No items were put forward.

**56**

**DATES OF FUTURE MEETINGS**

The dates of future meetings provided with the agenda were noted.

OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016

**MINUTES OF THE MEETING OF THE OVERVIEW & SCRUTINY COMMITTEE  
HELD ON THURSDAY, 14 JULY 2016**

**COUNCILLORS:** Derek Levy (Chair), Abdul Abdullahi, Katherine Chibah  
**PRESENT** (Vice-Chair), Nneka Keazor, Joanne Laban and Edward Smith.

**STATUTORY** Mr Tony Murphy (Catholic diocese representative)  
**CO-OPTES** Mr Simon Goulden (other faiths/denominations representative), 1 vacancy (Church of England diocese representative), Alicia Meniru & 1 vacancy (Parent Governor representative) – *Italics Denotes absence*

**OFFICERS:** James Rolfe (Director of Finance, Resources and Customer Services), Ian Davis (Director Regeneration & Environment), Rocco Labellarte (AD ICT, Finance, Resources and Customer Services), Paul Kearsey (AD, Transformation), Madeleine Forster (Housing Programme Manager), Dr Allison Duggal (Public Health Consultant) Andy Ellis and Elaine Huckell (Scrutiny)

**Also Attending:** Councillor Georgiou (Deputy Leader and Cabinet Member for Public Service Delivery) and Councillor Lemonides (Cabinet Member for Finance and Efficiency),

**67**

**WELCOME & APOLOGIES**

The Chair welcomed all attendees to the meeting. Apologies for absence were received from Kayah Taylor and Asiya Warsame (Enfield Youth Parliament) and Alicia Meniru.

**68**

**DECLARATIONS OF INTEREST**

Councillor Laban stated that her brother was a Headteacher at a Primary Academy (Free School). Councillors Abdullahi and Smith also referred to their positions as School Governors.

**69**

**SELECTION OF NEW WORKSTREAMS FOR 2016/17 AND 2017/18**

James Rolfe updated the Committee on the Enfield 2017 programme. He introduced Paul Kearsey as the AD for Transformation and Rocco Labellarte

**OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016**

as AD for ICT . He referred to the three main areas of forthcoming work for the team

- Finishing the job – this refers to projects that are to be completed in next few months and would include technology projects, aiming to ensure the new hubs are providing a good level of service to customers.
- Getting the Basics Right – this involves taking stock of what has been done and ensuring existing transformation principles and approach to delivering services are in place
- Building on New Foundations – moving forward on what has been delivered, to engage with staff, partners and customers to refine the way services are delivered

He said austerity is likely to continue whilst expectations continue to rise. Our systems need to ensure correct outcomes are achieved and that we can resolve customers' issues with the minimum of bureaucracy. We would continue to fully engage with our staff, to prioritise needs and fully utilize the resources available. He referred to the need to show the ROI, (Return of Investment) of new systems and the benefit to the community. Over the next six months a lot of work is to be done to ensure the website is fully functional - this would include the new artificial intelligence platform 'Amelia', which is being developed to answer general queries coming to the website. The new telephony system would also be going 'live'.

The following issues were then raised -

Councillor Smith said the report was helpful and he spoke of existing customer care issues that had been raised at the Council meeting the previous evening. He would be leading on a new 'Enfield 2017' Scrutiny Workstream, and stated that he considered there were three key points for this group to focus on -

- project management up to the point the system went live
- the provision of assistance for people using the new 'hubs'.
- a financial analysis would be required on the 'Return of Investment'.

Councillor Levy asked if the staff changes in the team had inhibited the project or had it moved forward as had been hoped? James Rolfe answered that he did not think these changes had affected the delivery of outcomes.

When asked if any lessons had been learnt from the first phase of the project, and if there had there been any unforeseen problems. James Rolfe answered that there had been a number of issues to be resolved but this was to be expected from the introduction of complex new technology. In future it would be important to bring in changes at the right pace so that they became fully embedded and staff and customers were confident in using them.

Councillor Laban asked when the new website would be fully operational?

An answer was given that this would be rolled out over the next few months. Although the final date for the new website to be fully operational had not yet been decided. A 'soft launch' has been held - the emphasis is on engagement with a few people at a time to ensure they are fully aware of



**OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016**

systems and their 'project user acceptance' has been given. The system/ website is aimed to be quicker and more responsive, there would be more links i.e directly through 'Google search'. We would then gradually lose the old links. The new pages would be systematically 'tried out' and the old pages decommissioned.

It was confirmed that 'software testing' had been taking place over a long period and this would continue. The Council would also be ensuring that people who use systems are involved in the testing process– There is also now a clear business owner of each area/ process who is engaged in the project to ensure the IT does what is needed.

Councillor Chibah referred to Members Enquiries and whether it will be possible to keep track of issues such as 'flytipping' on the system. James Rolfe confirmed that there will be a Portal (a members App) for members to use and we are currently working on the roll-out of this facility.

Concerns were expressed for members of the public who may not be aware of this transitional process. Councillor Smith asked if it was possible to provide some dialogue boxes on the website to inform them of changes. Confirmation was given that messaging/ signposting would be happening. James Rolfe also spoke of the new 'web chat' window that would enable customers to speak directly to a member of staff who would be able to 'load-up' pages for them. This service is currently being refined to improve the customer's experience.

Councillor Levy asked how the new telephony system would be introduced and what could be done to prevent problems occurring at this time. It was answered that the old system would not just be turned off and the other switched on, instead there will be a controlled move between the two systems. When everyone is comfortable that everything is working as it should, then the move over to the new system would happen. This is likely be on a Thursday afternoon so any problems could be rectified before the weekend.

Call handlers will be trained to use the new system, which will be an improved service and would enable details of a caller to be found immediately. The public would be able to see a real difference with the new website and would experience an improved service with the telephony system.

Councillor Laban asked for an assurance, and this was given, that the new telephony system would not be introduced until all relevant staff had been fully trained.

Councillor Levy referred to the Scrutiny Workstream on 'Quality of Communication' and how this may link with the new ICT services being introduced as part of Enfield 2017. It was confirmed that we were looking at a systems based/ consolidated approach to ensure all areas are correctly linked up and a good customer service is provided.

Officers were thanked for their presentation and it was asked that a further update be provided at a meeting of Overview and Scrutiny in November.

**AGREED**

## OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016

It was agreed that an update on Enfield 2017 be presented to Overview and Scrutiny Committee in November.

### 70

#### HOUSING REPAIRS UPDATE

Madeleine Forster (Housing Programme Manager) gave an update on performance in relation to the Repairs and Maintenance Contracts.

It was noted that a Scrutiny Workstream on this subject has been established and would be led by Councillor Chibah.

Madeleine Forster highlighted the following:

- Mobilisation of the new Repairs and Maintenance contracts began last year and although there have been some areas of unsatisfactory performance, we are beginning to see improvements by contractors. The data for May shows that performance is moving from 'red' towards an 'amber' service.
- The first year of the contracts for 2015/16 represented a reduction of £1 million from the 2014/15 budget and there had been further budget savings of £1.75m on the contracts for the year.
- Targets are set at the upper quartile level, and although this is correct, it does place a demanding expectation on contractors
- There had been a range of initiatives to engage with the contractors during the year including intensive contract management, and holding regular meetings and workshops. From the beginning of May 2016 contract penalties had been implemented.
- For Voids work, the team had to source alternative non-term contractors through the London Tender Portal last year. This followed unsatisfactory performance by the term contractors. There has been a phased reintroduction of voids work to the term contractors to enable them to remobilise effectively. Performance for this work is now much improved.
- Contract penalties include the issuing of defect notices. The contract states that if 25 notices are issued this can trigger the removal of an area of work from the contractor. Working through this issues it is apparent that the design of the penalty structure means that disproportionate penalties could be implemented, for example if work is carried out on only one void and this is ranked as unsatisfactory, it would be classed as a 100% failure. This would result in 95 defect notices and thus may lead on to the removal of work from the contractor. It was thought this did not properly reflect the intention of the original contract and that penalty/ defect notices should be re-examined.

Madeleine Forster referred to future proposals. She said it is intended that existing targets should remain and financial penalties be imposed.. However we may look to recalibrate the existing penalty structure. Meetings would be

**OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016**

held with the managing directors of contractors, following discussions with Councillor Oykenor and Councillor Smith.

The following issues were raised

Councillor Chibah questioned whether in some emergency cases penalties were severe enough. She spoke of an instance where a mother of young children had to vacate a property because of the need to carry out emergency repairs to a boiler, this may have resulted in her technically being made 'homeless'. Councillor Chibah also referred to work that is carried out by sub-contractors and the difficulties for residents in determining who is responsible. Madeleine Forster said there were many instances of sub-contracting in this industry. She stated that the main contractor is responsible for the performance of their sub-contractors and that this would be raised at the meetings with the Directors. She agreed that the balance of penalties does need to be examined to check if they are too onerous or not onerous enough. It was confirmed that we had a 4 hour timescale for emergencies and Ian Davis stated that we had a 100% performance on gas safety testing.

Councillor Laban did not consider the level of penalties was sufficiently high for the present service. Financial penalties can range from under £100 to over £1000. Madeleine Forster did not think the service currently provided by contractors would necessarily be assessed as poor - she thought that we might cause more problems for ourselves if defect notices resulted in the removal of work from contractors.

An issue was raised about the monitoring of customer service calls relating to contractors work outside working hours. It was also asked if comparative data could be provided from other Local Authorities.

**ACTION:** Madeleine Forster

Councillor Smith commented that it seems that the procurement process was flawed when we were appointing contractors and he said it now appears that the penalty notice system is flawed. Madeleine Forster denied that then procurement process was flawed. Ian Davis referred to the different ways that contracts of this nature are structured and suggested that it may be useful to look at the way other Local Authorities had designed their contracts.

In answer to a question about who would be responsible for providing a remedy should there be damage to a property, it was confirmed that regardless of the cause of the damage, Enfield's relationship is with the main contractor and they would be pursued to address the issue themselves or via their sub-contractor.

Councillor Levy spoke of leaseholder tenants work. An example he gave was work being undertaken in Bycullah Road, leaseholder tenants had received large maintenance bills, some in the region of £20K. Covering this area is a company who are below target on the 'quality of works' and 'customer satisfaction'. He asked how we can ensure that residents get value for money.

## OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016

Confirmation was given that we oversee this and over 90% of customers are happy with the service provided.

The next time this item comes before OSC will be when the final report of the Workstream is presented. Without pre-empting the content and outcome of the report, it would be useful to have an updated version of the performance summary presented with it.

**AGREED** That a further update on Housing Maintenance contracts be submitted to OSC in conjunction with the final report of the Housing Repairs Workstream.

**71**

### **FEMALE GENITAL MUTILATION UPDATE**

A report was presented by Dr Allison Duggal on Female Genital Mutilation (FGM) in Enfield, Health Needs Assessment – a Statistical Study.

Councillor Laban introduced this item. She said that from her experience the sharing of information across European states about FGM was poor. She welcomed the report and was pleased that this issue was being taken forward. She stressed that we needed to know whether these issues were being detected in schools and whether we were keeping girls safe in the borough.

Dr Allison Duggal highlighted the following:

- The report estimates the number of girls and young women at risk of FGM in Enfield. The methodology used for the statistical study was previously used by LB Islington.
- The reason that Enfield shows a high prevalence to FGM is because of the diverse make-up of the borough.
- The number of girls at risk of FGM in Enfield is 1144 – this is for girls who come from communities where there is near-universal FGM prevalence.

The following issues were raised:

Councillor Laban said she was shocked at the numbers given, and thought we needed to look at how the school service can be used to help target this problem. Allison Duggal provided an update which included an 'Action plan'. This gave details of a mapping exercise to be undertaken, and it also referred to work to be undertaken with schools.

Councillor Keazor said the report referred to girls being taken back to their country of origin during the summer school holidays for FGM to be carried out. She asked if any measures had been taken leading up to the end of the school term to prevent this from happening.

It was confirmed that leaflets had been prepared. The Department of Health had prepared a video aimed at African communities. The video refers to the

## OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016

harm of FGM to girls and covers the legal provisions around this issue. It also sets out the facts showing that no religion supports this practice.

Councillor Abdullahi said it was important that some of the smaller organisations are involved in mapping exercises. He thought people were now more aware that FGM was not a 'religious duty'.

Councillor Smith spoke of the necessity for Government and Local Authorities to take a positive stance against this practice and asked how many prosecutions had been made.

Allison stated that there has only been mandatory reporting of FGM by Police and Social Services since October 2015. From the data received, 11 young people who had been born in this country had been referred to Police. There has been one failed prosecution case so far, but authorities were now hopeful of a high profile prosecution.

Councillor Chibah said she thought schools were crucial in trying to combat FGM. In the school where she teaches the Head teacher has taken a proactive approach with concerted preventative action. Teachers need to look at families where there may be risks. She thought schools should be prioritised, however she queried what would happen if a school was not under local authority control such as an Academy.

It was confirmed that all Safeguarding issues are covered by the local authority including school nursing services. It was agreed that schools should be prioritised and it was thought we ought to concentrate more on Primary Schools. This should include social workers, teachers and all appropriate professionals including CCG's (Clinical Commissioning Groups).

It was asked if the physical and mental health pressures resulting from FGM on the NHS was quantifiable/ trackable. Allison referred to a clinic at North Middlesex Hospital that has been established with the help of colleagues from LB Haringey to help adult older women (approx. 3500) who have been affected by FGM.

Women are referred to the clinic through the midwifery service. It is funded by the CCG (NHS) for this financial year, but we need to ensure there is funding for this in future. Information on findings/ results from the clinic has been requested by Allison and this should be available in the next few weeks. Allison Duggal said she would be leaving the service shortly and thanked Members for their interest and mentioned her concerns for this work to continue and its future funding.

Members thanked Allison for her report.

**72**

## **SCHOOL PLACES SCRUTINY WORKSTREAM- FINAL REPORT**

Councillor Chibah, as Chair of the School Places Scrutiny Work stream, introduced the report. The Work Stream was set up to look at the provision of school places in the borough to examine how the local authority ensures that

**OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016**

both current and future demand is met for primary, secondary and special schools.

She highlighted the following:

- This is a complex area with huge pressures on Enfield as a result of demographic changes in the borough and also legislative changes.
- It was reassuring to see the work that is being done by the Education service which has to keep a fine balance between under and over - capacity in schools.
- An area of concern for schools is the high rise in the number of cases of pupils with autism. It is not known why this is happening she supported a national request for research into why the substantial increase in autism is being seen. There are pressures on special school places as a result of this increase. Additional provision for children with autism in the borough is being progressed.
- Although we work with Central Government when planning for school places, the new school academies can be set up without local authority agreement. We need to ensure that information is shared with other boroughs and that discussions are held with Government in an effort to make this process more workable.
- Visits took place to different school academies and it was apparent that whilst one of the academies had a good/positive connection with the council, another academy did not have this good relationship. It is important that positive connections are maintained with academies as far as possible.

Members thanked Councillor Chibah for her update and for the very thorough report. There will be a further opportunity for the Committee to look at the issues raised following further discussions with the Cabinet Member and Director.

**73**

**AGENDA PLANNING**

**AGREED**

The Work Programme for 2016/17 was tabled and agreed at the meeting. It would be submitted to the Council meeting in September. Additional items can be included in the Work Programme for consideration should this be necessary.

It was suggested that it may be useful for papers to be circulated and questions asked before the meeting.

The following subjects to be included on the Work Programme:

- A further update report on Enfield 2017 is to be discussed at the November 2016 meeting

**OVERVIEW & SCRUTINY COMMITTEE - 14.7.2016**

- The Council's Housing Allocations Policy is in the process of being reviewed, it was suggested that Councillor Oykenner be invited to attend a future meeting to discuss this issue, as pre-decision scrutiny.
- A subject on 'Agenda Planning' to be included on each agenda to decide items for consideration, this may include an item on 'Local Plan Review'
- An item on FGM to be considered at the Health Scrutiny Standing Work stream in 2017/18.
- Housing Benefit – (including appeals claims) to be considered as an additional item on the Work Programme.

**74**

**MINUTES OF THE MEETING HELD ON 25 MAY 2016**

The Minutes of the meeting held on 25 May 2016 were **AGREED**

**75**

**DATES OF FUTURE MEETINGS**

The dates of future meetings were **NOTED**.

**76**

**EXCLUSION OF THE PRESS & PUBLIC**

This page is intentionally left blank