



Sarah Cary  
Executive Director, Place  
London Borough of Enfield  
Via email

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7 December 2018

Dear Sarah

## **Enfield's Draft Local Implementation Plan**

Thank you for submitting the London Borough of Enfield's draft Local Implementation Plan (LIP) to TfL for consultation.

London's boroughs play a vital role in delivering the Mayor's Transport Strategy (MTS) and helping to achieve the ambitious target for 80 per cent of all trips in London to be undertaken by active, efficient and sustainable modes of travel by 2041. That is why this third round of LIPs is so important in demonstrating how the MTS will be implemented at a local level across the city.

Colleagues at TfL have reviewed your consultation draft submission. The intention of our assessment is to be constructive in assisting you to achieve approval. I enclose here detailed comments for your consideration ahead of the final draft LIP submission to TfL on 16 February 2019.

Final approval of the LIP will be a matter for the Mayor. There are many elements of the London Borough of Enfield's consultation draft LIP which are welcomed. However, our review has identified a number of matters we consider necessary to be reviewed and strengthened. Addressing these issues in full is required for the London Borough of Enfield's LIP to meet the necessary standard we believe the Mayor would consider adequate for approval, in accordance with the conditions set out in section 146 of the GLA Act (1999).

A summary of our key comments is as follows:

- The LIP clearly sets out how Enfield's aspirations and objectives align with those contained in the MTS.
- The longer term goals included within the LIP are consistent with the aims of the MTS and there is a very clear prioritisation process set out in your LIP for these.

- The commitment to adopt a Vision Zero approach and develop a Vision Zero Action Plan is strongly welcomed.
- More spatial analysis could be included to sign post how the programme of work will address the challenges and overcome barriers to achieving the outcomes set out in the MTS. To help with the spatial analysis, more detail could be included from the City Planner tool which is now available.
- The proposals and programme of delivery could benefit from further, more specific detail to provide further confidence that the outcomes set out in the MTS are achievable.

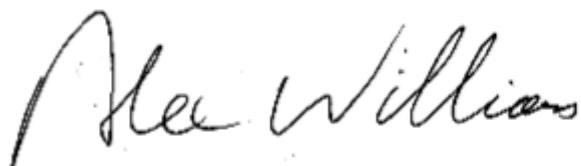
A list of specific comments is enclosed in the annex to this letter.

We look forward to continuing to work with Enfield over the coming months as you finalise your LIP. My team will contact your officers to request a follow-up meeting to discuss our feedback. In addition, I request that you write to me confirming receipt of this letter and outline in your reply how you will amend your LIP in response to our comments.

Please do not hesitate to contact us going forward should anything in our response require clarification or if you need any support with the further development of the LIP. The key contacts for Enfield are:

Helen Fallon - Transport Strategy contact  
Sideeck Roojee - Network Sponsorship contact

Yours sincerely

A handwritten signature in black ink that reads "Alex Williams". The signature is written in a cursive, flowing style.

Alex Williams  
**Director of City Planning**  
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## **Third Local Implementation Plan – Consultation Feedback Form December 2018**

**Borough name: Enfield**

### **1.LIP guidance requirements**

1.1 All requirements met.

### **2.Objective setting – Mode share**

2.1 All requirements met, however clearer links between proposed programmes of work and the borough challenges would strengthen this section.

- *Clarification: 60% of existing car journeys are generated locally (p.30). This contradicts the impacts of traffic congestion from the M11 and the M25 as stated in the Mini-Holland report.*

### **3.Objective setting – MTS Outcomes**

3.1 The LIP is aligned with the MTS Outcomes, however, more detail around the delivery programmes will demonstrate the borough's to deliver against them. More detail should be included around co-ordination with neighbouring boroughs, e.g. schemes and existing facilities in neighbouring boroughs.

3.2 Further commentary, graphics and spatial information should be provided to support the following outcomes:

Outcome 1: Whilst there is a good level of contextual data on health, there is less on cycling. Given the strategic work and excellent delivery record Enfield has for the Mini Holland programme this section could easily be strengthened e.g. using the TfL cyclable trips analysis.. Do the demographics of the borough suggest any particular pockets of opportunity for investment.

- *Clarification: Legend is missing on the cycle map on p.47; what do the cycling routes represent and how do they connect with other cycle routes in neighbouring boroughs.*

Outcome 2: To demonstrate alignment with Vision Zero, more spatial analysis of where there are road danger hotspots and how this will inform interventions..

Outcome 3: Use of data in the LIP is good for this outcome, however it could be strengthened with further detail on car ownership in the borough, possibly spatially if available and where and why (trip purpose) people drive.

Outcome 4: This section could be strengthened with a spatial breakdown of where the air quality hotspots are in the borough, possibly taken from your AQAP.

Outcomes 5,6 & 7: A map of bus speeds could be included as this is one of the KPIs. There are references in the text, but they could be more specific.

Outcomes 8 and 9: Further detail could be included here on the opportunity/challenge in getting people to make non-car trips in the growth areas. CR2 is mentioned, but bus priority and better cycle routes could also be identified.

#### **4. Borough targets**

4.1 We note that targets have been set in line with the borough data pack in all cases. Further spatial data, assessment of local challenges and opportunities to address these through a more detailed delivery plan would provide more confidence that these are achievable.

##### Outcome 2

4.2 Following the moves to new collision reporting systems – the Case Overview and Preparation Application (COPA) for the Metropolitan Police Service and Collision Reporting And Sharing (CRASH) for the City of London Police – we have now completed initial back estimates for the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 (contained in the 2017 'Casualties in Greater London' factsheet, available on the TfL website alongside supporting data tables at <https://tfl.gov.uk/corporate/safety-and-security/road-safety>).

4.3 We will issue a revised set of borough trajectories for Outcome 2 and Vision Zero and need boroughs to update their targets to reflect these new trajectories in their final LIP for 2022 and 2030 (2041 is unchanged at 0). The level of ambition remains unchanged, despite these revised figures. The borough is also asked to include the following text in the final LIP under Outcome 2 explaining the reasoning for the change in trajectories and targets:

*'The Metropolitan Police Service (MPS) introduced a new collision reporting system in November 2016 - the Case Overview and Preparation Application (COPA). The City of London Police also moved to the Collision Reporting And Sharing (CRASH) system in October 2015. This has had a number of impacts on the data that is available to Transport for London (TfL), and the London Boroughs in the ACCSTATS database for collision investigation.*

*Under the new systems officers use an 'injury-based assessment' in line with DfT STATS 20 guidance and online self reporting is available. Both of these changes are expected to provide a better assessment of injury occurrence and severity but have made data collected from November 2016 onwards difficult to compare with earlier data.*

*TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 and this data has been used to update borough targets to align with those contained in the Mayor's Transport Strategy, namely a 65 percent reduction in KSIs by 2022 against the 2005-09 baseline, a 70 percent reduction in KSIs by 2030 against the 2010-14 baseline and zero KSIs by 2041. The targets contained in this final version of the LIP have been set against Outcome 2 for Vision Zero to reflect the reporting changes. The level of ambition remains unchanged, despite these revised figures.'*

#### **5.Delivery Plan – Longer term**

5.1 Good detail included on method of prioritisation for long term investment.

#### **6.Delivery Plan – 3 year programme**

6.1 Further detail could be included in the three year programme to demonstrate the programmes are targeted to meet the outcomes of the MTS and challenges identified in the earlier sections of the draft LIP.

#### **7.Delivery Plan – 1 year programme**

7.1 Further detail should be included on what is being proposed under each area (or at minimum a long list ahead of the prioritisation process being applied). Further detail could be included on how outcomes are being addressed, e.g. locations and timescales.

It is also noted that there has been no allocation in the delivery plan to develop bus priority measures. Bus priority measures should be investigated / identified. Whilst it is recognised that it is not always feasible to reallocate road space to bus lanes, other measures can support prioritisation of buses ahead of general traffic.

Please reply to: Dominic Millen

Alex Williams  
Director of City Planning

E-mail: [Dominic.millen@enfield.gov.uk](mailto:Dominic.millen@enfield.gov.uk)

My Ref: LBE Rep to TfL LIP3 Com

Via email: [alexwilliams@tfl.gov.uk](mailto:alexwilliams@tfl.gov.uk)

Your Ref: -

Date: 2<sup>nd</sup> February 2019

Dear Alex

### **TfL's Response to Enfield's Draft Local Implementation Plan**

Thank you for your letter of 7 December 2018. It is welcome that you acknowledge the vital role that London's Boroughs play in working with TfL to deliver the Mayor's Transport Strategy. I and colleagues here at the London Borough of Enfield look forward to building on our existing relationship with TfL, to deliver an ambitious programme of work as set out in our draft Local Implementation Plan 3 (LIP3) document.

Your summary of key comments in respect of this document are helpful and we have taken these as supportive of our priorities and objectives. We have also taken the view that there is nothing in your response which questions the fundamental soundness of our LIP3. This is something of a relief to the various members of my team who have worked to bring this together.

In respect of the specific comments, I thought it would be useful to outline what we have done to address them:

- 2.1 This has been clarified with colleagues at TfL.
- 3.1 More information has been provided on the detail of our work programme including joint initiatives with neighbouring boroughs.
- 3.2 Where available and relevant additional information has been provided including from the City planner tool:
  - Outcome 1 – The case for promoting cycling was made extensively in Enfield's Mini-Holland submission so this has been referenced.
  - Outcome 2 – Work has been commissioned to look at priority locations for our next tranche of interventions. This will be informed by the latest collision data which has only recently been made available.
  - Outcome 3 – More analysis has been provided.
  - Outcome 4 – More information has been provided which shows that the majority of air quality hotspots are on roads outside of the Council's control.
  - Outcomes 5,6 & 7 – More information has been provided.
  - Outcomes 8 and 9 – More information has been provided.
- 4.1 Given we are in the final quarter of 2018/19 and funding has now been confirmed for 2019/20, our intention is to prepare a more detailed delivery plan before the end of March. This will be subject to political approval but can be shared with TfL colleagues once drafted.

- 4.2 The LIP3 has been updated to reflect the update historical data with targets changed in line with the guidance.
- 4.3 The LIP3 has been updated to reflect the update historical data with targets changed in line with the guidance.
- 6.1 Given that the three-year funding programme allocations are constant and it is the actual schemes which are subject to change, including re-profiling in line with external funding availability, we believe that the level of detail provided is appropriate at this time.
- 7.1 More detail has been provided and there is reference to the Proforma A which accompanies the main LIP3.
- 7.1 Bus priority is something which is considered when identifying and delivering schemes under other programme areas, for example Cycle Enfield, so a separate allocation has not been included at this time.

I would like to thank you and your team for your hard work supporting the preparation of our LIP3. We look forward to working with TfL colleagues to finalise our LIP3 and begin delivery.

Regards

Sarah Cary  
Executive Director, Place

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