

London Borough of Enfield

Portfolio Report

Report of: **Head of Traffic and Transportation**

Subject: **Three Emergency Access Camera Sites**

Cabinet Member: **Cllr Guney Dogan**

Director: **Doug Wilkinson**

Ward: **Bush Hill Park, Edmonton Green, Town**

Key Decision: **Non KD**

Purpose of Report

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

Proposals

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

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

Reason for Proposals

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

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

Relevance to the Council's Plan

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

Background

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

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

Main Considerations for the Council

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

Safeguarding Implications

33. None identified.

Public Health Implications

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

Equalities Impact of the Proposal

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

Environmental and Climate Change Considerations

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

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

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

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

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

Financial Implications

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

Legal Implications

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

42. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 prescribe the procedure to be followed in making a traffic management order. Any written objections or representations received during the consultation period must be considered, conscientiously, before deciding whether to implement the change.

43. The recommendations contained within the report are in accordance with the Council's powers and duties as the Highway Authority.

Workforce Implications

44. None identified.

Property Implications

45. None identified.

Other Implications

46. None identified.

Options Considered

47. The suggestion was made, for the Ladysmith Road site, that the lockable barrier be replaced with an electronic system that raised the barrier automatically - or remotely from a control centre - when emergency access was needed. The community felt some form of physical barrier offered greater reassurance than the psychological deterrent of the camera. LAS stated having no objections to such a system if workable.

48. One submission from the community included an estimate of below £10,000 for such a product; as might be seen controlling access to a car park. However, even if this were deemed a robust enough model for placing in the public road, the costs attributed are not likely to account for preparatory work within the road construction – cabling and footings – nor for an electricity board connection. Concerns over the tendency for such products to fail under the action of vandals or poor drivers and then be costly to have repaired or replaced by specialist providers explain the Council not having installed any such mechanisms on its highway network hitherto.

49. More fundamentally, a physical barrier with electronic controls shares the same drawbacks as a conventional barrier. It will tend to accrue maintenance costs across each year of service that must be met via public funds, unlike a camera that will pay for itself from even small numbers of PCNs issued to contravening drivers. Moreover, a camera that is temporarily out of service poses no unexpected delay to an emergency crew but retains the potential for deterrent in the mind of the driver seeking a short-cut. By contrast, a barrier that is found jammed shut when needed could send an emergency crew back around a long detour; while one that is jammed open is both a hazard and an invitation for misuse.

Conclusions

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

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

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

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Appendices

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

Background Papers

None.