

## London Borough of Enfield

### Portfolio Decision of Cabinet Member for Environment and Sustainability

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**Subject:** Farm Road Yellow Lines and Bus Route 456

**Cabinet Member:** Cllr Guney Dogan

**Director:** Doug Wilkinson

**Ward:** Winchmore Hill, Palmers Green, Bush Hill Park

**Key Decision:** Non KD

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#### Purpose of Report

1. To recommend proceeding with installing fixed bus stops and related parking controls in Farm Road, which will offer wider public benefits by reducing the risk of regular delay to the future 456 bus service due to the present lack of passing space. This is a revised arrangement which reasonably mitigates the loss of residential parking options, thus taking into account the concerns raised by residents.
2. Also to:
  - (i) make explicit the Council's support of TfL's decision of April 2020 to introduce route 456 along Church Hill, Station Road, Farm Road and Firs Lane, and
  - (ii) confirm its intention to work with TfL to introduce fixed bus stops at suitable positions in Church Hill, Station Road and Firs Lane, subject to further consideration of comments from adjacent households and community interest groups.

This is in response to two further petitions against the route arising from those objecting to site specific proposals for fixed bus stops.

#### Proposals

3. To make the traffic management order pursuant to Section 6 of the Road Traffic Regulation Act 1984 to implement the double yellow lines shown at Appendix B and also to implement the bus stops.
4. To make a traffic management order pursuant to Section 9 of the Road Traffic Regulation Act 1984 to implement the single yellow lines shown at Appendix B on an experimental basis.
5. To invite comments on the single yellow lines during their trial period and, within 18 months, to prepare a subsequent report to determine whether these controls should be made permanent in the light of operational experience and feedback.
6. To fund the estimated £6,000 cost of implementing all the measures from the 2020/21 Bus Priority Programme allocation.

## Reason for Proposals

7. In 2019 Transport for London (TfL) undertook a consultation on a proposed new bus service: route 456. The proposed route is to extend the existing W10 service that links Crews Hill to Enfield Town; with buses continuing from the town to North Middlesex Hospital via Highlands, Winchmore Hill and Firs Lane. A TfL leaflet was delivered to relevant homes in the area in 2019 seeking comments on the route proposal and stating that supplementary proposals for yellow lines (in Farm Road) and bus stops (Farm Road and others) would follow from Enfield Council if the route were to go ahead.
8. Enfield Council submitted comments in support of the routing proposal, seeing benefits for residents and the environment in improving bus links to the hospital and in bringing bus services to certain areas of the borough, notably Church Hill, Station Road and Firs Lane, that have hitherto gone unserved.
9. TfL released its consultation report in April 2020 summarising that most responses to the proposal were positive and indicating its decision to proceed with the route. The department has since drawn up the proposals for yellow lines in Farm Road to contribute to the process set out and to ensure buses in Farm Road are not unduly delayed by opposing traffic due to a lack of passing space. The department has similarly drawn up proposals for fixed bus stops in various roads to ensure the new service benefits from good levels of accessibility for those with impaired mobility.
10. Enfield Council published draft Traffic Management Orders and undertook a statutory consultation in September 2020 on the Farm Road proposals seen at Appendix A.
11. The narrow section of Farm Road near the bridge is already treated with double yellow lines. Elsewhere Farm Road is wide enough, even at its narrower sections, to accommodate parking both sides and allow a bus to pass. However, parking patterns are sufficiently dense to raise the concern that, in busier periods, the bus would be unduly delayed by opposing traffic. This would affect bus journey times, contribute to local peak period congestion and undermine the appeal of the bus service to prospective passengers. Double yellow lines along the northern side of Farm Road were proposed to avoid these drawbacks arising.
12. The department had also identified locations for a fixed bus stop in each direction on Farm Road that it felt were suitable in terms of catchment and spacing and that benefit from a reasonable degree of natural surveillance without being directly outside any home. By September 2020 TfL had been able to confirm that funding was available to match the aspiration stated in its consultation documents of providing fixed stops along the route, and hence the bus stop proposals were included in the plan sent to residents of Farm Road.
13. Responses indicated that most of the circa 50 households in Farm Road were in opposition to the proposals. Notable was a petition signed by 40 Farm Road households, plus one Firs Lane address falling within the same section of street. The ten-page document appended to the petition encapsulates the points of opposition. The concerns of residents were reiterated in correspondence from elected representatives serving the area, including its ward councillors and MP.
14. The petition documents cover the following:
  - (A) opposition to the double yellow lines
  - (B) opposition to the bus stops
  - (C) opposition to the use of Farm Road for the bus route

(D) counter proposals recommending 6 alternative alignments for the service.

15. At Appendix B is a revised layout of measures, drawn up to mitigate the key concerns raised. The retained sections of double yellow line fall under the coverage of the original proposals and their draft Traffic Management Order, as advertised. See section 3 above. The single yellow line is proposed under experimental powers and can be amended or withdrawn in due course if found to offer little benefit.
16. Appendix C is a discussion of the concerns raised by the residents and a justification for the Council's position that the revised measures should be introduced for the wider benefit of the travelling public. More general concerns about the introduction of the route arising thereafter, notably from residents of Firs Lane, are also covered in Appendix C. It should be noted, however, that this document does not constitute a decision on the alignment of the route. That decision has already been made, the body to whom the decision-making responsibility fell being TfL.
17. Appendix C also sets out the Council's position that it remains committed to introducing fixed bus stops within the newly served streets in Winchmore Hill, subject to suitable locations being identified. Aside from those in Farm Road, decisions on these new bus stops will be documented separately hereafter.
18. The Winchmore Hill Residents Association was also consulted on the proposed bus route, initially by TfL, and latterly on the proposed bus stop positions by this department, offering further community oversight on the proposals. Despite some adverse comment about certain bus stops the association appears supportive of the route, and of the favoured alignment, and of the concept of providing fixed bus stops.

## Relevance to the Council's Plan

19. The Council's plan directs the organisation to interventions that will "help improve public health and people's wellbeing". Converting car trips to bus trips by helping introduce a service that is better, quicker, more direct, and easier to access by a greater number of households aligns with this aspiration. Improving access to the hospital for those who lack the option of driving is of clear benefit to public health. Boosting levels of sustainable travel also matches the Council's commitment to heathy streets and to tackling the climate emergency.

## Background

20. TfL's consultation on the introduction and alignment of the route (see sections 7 to 9 above) commenced in 2019. TfL's report of April 2020 can be found on its website.
21. In Highlands the route uses Worlds End Lane, which already features bus stops; the existing 377 service uses its northern end, and the W9 service its southern end, but neither service offers a direct route east towards Green Lanes or towards the hospital. Moving south, Eversley Park Road also has existing bus stops. Church Hill, Station Road, Farm road and Firs Lane have not previously carried buses so do not feature bus stops. The W6 service uses Hedge Lane on a 'hail and ride' basis.



22. 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.
23. The yellow marking used at bus stops can be placed at the highway authority's discretion, it does not fall under the traffic regulation order procedures. In this case, the proposed markings have been indicated on the drawings, allowing the public to pass comment.
24. A large number of streets in the same ward, west of Green Lanes, fall within the Winchmore Hill Station Controlled Parking Zone (CPZ). This was established in 2006. It operates on weekdays, 10:30am to 11:30am. The single hour control is generally effective at deterring all day parking by station users but gives maximum flexibility to residents regarding on-street parking options of their own vehicles.
25. Since 2015 the Council's approach to CPZs has been to only to consider new or extended zonal controls in streets where most homes lack off-street parking, in order to focus scarce parking scheme resources on those neighbourhoods where parking pressure is most severe. The need to place zonal signs at the boundary points, to place smaller parking signs at each bay within the zone, and to commission our parking contractor to add the street to their permit sales system mean that whole scheme costs are substantially higher than those incurred in merely placing the road markings.
26. With a high percentage of homes on Farm Road having frontage parking, and some also having rear garages, the street does not meet the criteria for the zonal parking controls that some have requested. However, applying sections of one-hour single yellow line to deter commuter parking can be considered in exceptional circumstances as a proxy measure. In this case there is a public benefit in disincentivising car use by commuters and visitors to the area by regulating use of the southern kerbside at the western end of the road.

### **Main Considerations for the Council**

27. The Council needs to consider the strongly expressed opposition from residents of Farm Road to the selection of their street for the bus route, and their dislike of the subsequent parking controls that TfL and the Council consider necessary for the route to operate efficiently.
28. It needs to consider, against this, what other viable options might have been chosen. Otherwise it needs to consider all the numerous unwanted consequences of the route not coming into operation as planned as a result of the Council abandoning its supporting measures. These drawbacks would include: reputational damage in failing to act in accordance with the Mayor's Transport Strategy and its own commitments on encouraging sustainable travel to tackle the climate emergency; failure to provide an attractive bus service to the hospital for those elsewhere in the borough who may not enjoy the same high levels of car ownership found in Farm Road; and potential contractual complications between TfL and the chosen operator of the new route.

### **Safeguarding Implications**

29. None identified.

## **Public Health Implications**

30. Any set of proposals whose effect is to improve access to the local hospital for a large catchment of homes offers obvious benefits to public health. The proposals also promote the use of buses for these trips while, by regulating kerbside parking at the location of interest, offer a localised disincentive for car use for trips to the Winchmore Hill area. Therefore, the proposal's secondary effects also align with the recognised public health benefits of shifting the percentage of trips from car onto other travel modes. These benefits include more physical activity amongst the population. In the longer term they help limit future congestion across the wider network, thus helping limit the effects of worsening air quality going forward. Climate change poses a threat in itself to public health. Any measure likely to reduce traffic is likely to improve health.

## **Equalities Impact of the Proposal**

31. Local authorities have a responsibility to meet the Public Sector Equality Duty of the Equality Act 2010. The Act gives people the right not to be treated less favourably because of any of the protected characteristics. The needs of these diverse groups must be considered when designing and changing services or budgets so that decisions do not unduly or disproportionately affect access by some groups more than others. Accordingly, an Equality Impact Assessment of the proposal has been undertaken and is included at Appendix D. This has concluded that the proposal will have a neutral or positive impact on the various protected groups, with a particular benefit for some older and disabled people due to the improved accessibility to a bus service afforded by the fixed stops.

## **Environmental and Climate Change Considerations**

32. The proposals align with measures to tackle climate change by encouraging use of buses over private cars and hence by lowering vehicular emissions. This is due to buses offering far greater efficiency in terms of road space occupation and fuel consumption, relative to the same amount of people traveling in cars. Transport accounts for 39% of CO<sub>2</sub> emissions in the borough while studies continue to show that a great number of trips made in the region are shorter than 2 miles and hence are often easily undertaken without using a car. The route has been tested using TfL's single deck electric bus – which is slightly longer than the equivalent diesel model with which operations will commence - in line with TfL's plan to switch to low and zero carbon buses over the coming years.

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

33. The risk of reputational damage to the Council applies wherever it fails to act in accordance with the Mayor's Transport Strategy and its own commitments on encouraging sustainable travel to tackle the climate emergency. A further risk applies in potential contractual complications between TfL and the chosen operator of the new route.

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

34. The opposing reputational risk applies in proceeding which may then prompt some in the community to claim that their objections to the proposals have not been heeded.

This risk is mitigated by the Council being conscientious in following the relevant regulatory process carefully; and by giving due regard to the points of opposition raised; and by recording its considerations on the matter with care and clarity within this document; and in having significantly revised its proposals to address the concerns raised, where this does not conflict with the overall necessity of implementing the parking controls.

### **Financial Implications**

35. The estimated implementation cost of the yellow lines and bus stops in Farm Road is £6,000, which shall be met by a specific funding contribution made by TfL in summer 2020 to allow Enfield Council to implement certain changes on its network that enable the bus route to commence operation.

### **Legal Implications**

36. 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.
37. 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.
38. In the case of the proposals being introduced on a permanent basis, 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.
39. In the case of the proposals (the single yellow line) being made on a trial basis, an experimental traffic management order pursuant to Section 9 of the Road Traffic Regulation Act 1984 is to be made. Any feedback from the public on this element will be collated over a period of 6 to 18 months, after which the arrangements can be amended, removed or made permanent by reverting to use of the same regulations referred to above. Section 6 of the RTA enables permanent traffic management orders to be made.
40. The recommendations contained within the report are in accordance with the Council's powers and duties as the Highway Authority.

### **Workforce Implications**

41. None identified.

### **Property Implications**

42. None identified.

### **Other Implications**

43. None identified.

### **Options Considered**

44. The option of a continuous double yellow line on the northern side of Farm Road was proposed initially. The revised proposal for shorter sections of double yellow line mitigates concerns from the community and is made upon the reflection that a sequence of passing places may have a similar beneficial effect on the ability for buses to pass opposing traffic with adequate ease in most circumstances.
45. Appendix C considers the alternative options put forward by the residents of Farm Road – any of which would then make the Farm Road proposals void - but concludes that it is the alignment upon which TfL consulted, via Farm Road, that offers the greatest benefits.

## **Conclusions**

46. This report concludes that the Council should proceed with implementation of the bus stops in Farm Road; and with the revised arrangement of double yellow lines; and with the trial arrangement of supplementary single yellow lines to facilitate the smooth introduction of the new bus service by TfL whilst mitigating the strongest concerns put forward by residents.

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## **Appendices**

Appendix A: Drawing Showing Original Farm Road Proposals  
Appendix B: Drawing Showing Revised Farm Road Proposals  
Appendix C: Discussion on Local Opposition to Proposals  
Appendix D: Equality Impact Assessment

## **Background Papers**

None.