

## Farm Road Yellow Lines and Bus Route 456

### Appendix C – Discussion of Local Opposition to Proposals

#### Part 1: Farm Road Yellow Lines and Bus Stops

1. Comments received to the statutory consultation 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.
2. 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.

#### **(A) Objection to double yellow lines on Farm Road:**

3. The petition asserts that the extent of the new yellow lines proposed is unacceptable given that residents have “limited off-street parking”. A supplementary point is that the section of kerbside at the western end shown on the plan as being left unmarked to accommodate domestic overspill parking is routinely occupied by daily commuters or used as long-term storage for vehicles whose owners may live in other streets. Some correspondents suggested that a Controlled Parking Zone (CPZ) should be introduced to remedy this situation.
4. **In response**, it can be seen from Appendix A that almost all Farm Road homes benefit from off-street parking. Looking at the 36 homes on the northern side, those falling within the limits of the proposals number 30; of these 26 have frontage parking, only 4 do not. Frontage parking also predominates on the southern side of the street. Looking at parking capacity within the street as a whole, it can be seen that many homes have space for more than one car on their frontage; that several have access to additional rear parking facilities; that the westerly sections of kerbside not fronted by homes offer the potential for overspill parking of around 20 vehicles; and that scores of spaces in the adjacent Fords Grove Car Park could be used for free parking overnight and on Sundays, at least on a last resort basis.
5. The point of objection is therefore overstated. Farm Road residents have far better parking capacity and options than are found across large areas elsewhere in the borough. However, officers acknowledge that the lines prohibit the habit of parking across one’s own dropped kerbs and have particular sympathy with the four households affected that lack frontage parking. Accordingly, officers now propose to limit the new lines to those shown at Appendix B. This moves to a system of regular passing places rather than a continuous parking restriction on one side. It covers the two bends along the street but avoids placing lines in front of the 4 homes without crossovers. Counterparts at TfL are willing to proceed in the

anticipation that this will prove sufficient, but the matter could always be revisited under future proposals. Given that the two proposed bus stops are taken to act as passing places; omitting the bus stops would further the argument for introducing more extensive double yellow lines.

6. Since 2015 the Council's CPZ policy has been to consider requests only in streets where most homes lack off-street parking space. Demand for zonal controls across the network is high, but resources to introduce them only limited. This policy helps retain focus on those streets where domestic parking options are fewest, often where homes are no wider than one car length and where none has off-street parking space; which is an extreme contrast to the parking options found in Farm Road. Zonal parking controls require more signage and a greater investment in consultation activity than introducing yellow lines. For these reasons, and to keep faith with residents of similar streets whose requests have been rejected previously, it is not deemed appropriate to extend the scope of the proposals to providing a CPZ.
7. However, there is a wider benefit to deterring occupation of the overspill parking section of kerbside by commuters, who could pay to use the adjacent car park or chose more sustainable travel methods rather than contributing to congestion by driving into the area for their routine trips. For this reason the revised proposal includes the introduction, on a trial basis, of a single yellow line operating 10:30am to 11:30am on weekdays. This will remove the presence of unused vehicles being left here long term and tackle most of the commuter parking usage. The residents would therefore be able to dominate use of this space outside of the controlled period, including from 11:30am Friday through to 10:30am on the following Monday. The introduction could be made permanent in due course following a suitable period of feedback.

#### **(B) Objection to bus stops on Farm Road:**

8. Comments in opposition to the placement of bus stops are listed below:
  - (i) Stops are not needed or wanted – residents could make use of bus stops on Firs Lane or Station Road when accessing the 456 service (and nearby main road stops for other destinations.)
  - (ii) If stops must be placed, put them both at the north-west end beyond the section with fronting homes.
  - (iii) It is not appropriate to place stops here in the absence of facilities to help passengers cross the road to access them.
  - (iv) Dwelling buses would be occupying passing space, contributing to congestion.
  - (v) The footways are too narrow – people waiting to board would obstruct the path of pedestrians, hindering wider accessibility.
  - (vi) Other nuisance factors apply, including the following: increased light and glare; people making noise, smoking or littering whilst at the bus stop; noise of bus doors etc; school pupils gathering at stops rather than walking; intimidation, intrusion and crime; reduction in property values.
9. **Unwanted bus stops:** TfL's aim is to place consecutive stops no further than 400m apart. This spacing is duly achieved by having a pair of stops in Farm Road. By omitting them, the distance between the proposed sequential positions that remain - Station Road (near Hazelgreen Close) and Firs Lane (near Hyde Park Avenue) - is almost 700m. Close spacing helps to increase the appeal to the local community of using the bus service over making

the same trips by car. It also helps to minimise unwanted walking distance for those with impaired mobility or who happen to be encumbered by small children or baggage for the journey in question. Within this spacing convention, the exact positioning of stops can also be chosen to maximise the short-walk catchment of surrounding homes. This concept is covered below.

10. Maximising the convenience of bus travel aligns with the Council's commitments to tackle the climate emergency. In terms of how much future use is made of specific bus stops in Farm Road, consideration must be given not just to the preferences of the most vehement opponents of the proposals today but also to the following groups: passengers living elsewhere using the stops to visit the area; prospective service users from Fords Grove and Highfield Road; prospective service users from Farm Road who are not signatories to the petition or who may, upon reflection, end up making use of the stops nevertheless; and future occupants of homes on Farm Road.
11. Similar opposition to the placement of specific bus stops has been submitted from adjacent households at nearly every position at which they have been proposed along the four newly served streets in Winchmore Hill. Hence it can be viewed as inevitable - wherever fully accessible bus services are proposed - that there will be households along the routes who dislike the accompanying bus stops. Bus services and their infrastructure are a vital and much used component of London's transport system. There are more than 500 bus stops in Enfield with most sited near homes, either in suburban settings or flats above shops in high streets. Therefore, the Council cannot accept the assertion that having bus stops situated near to homes is wrong.
12. The objectors argue that the Farm Road bus stops are exceptionally without merit relative to the drawbacks they assert. The same objections have been raised in other streets - regardless of the street's width, length, proximity of adjacent homes, parking capacity and so forth - and would almost certainly have been raised by corresponding households along any alternative routeing options through the neighbourhood. Localised opposition to bus stops thus being universal, the fairest approach a local authority can take is to propose them where they best serve the passengers and the community but favouring sites that are less intrusive over those that are more intrusive, when all other factors are equal. This is the principle upon which these positions have been selected.
13. **Placing stops away from fronting homes:** The tendency of households to object to nearby bus stops raises a similar point of fairness as their tendency to opine that they should be moved along the street to more secluded positions. Bus stop positions will make the service more appealing – particularly to more vulnerable passengers - when they benefit from natural surveillance, rather than when they are deliberately moved into the most poorly overlooked spots in any given street.
14. In winter months the 7am to 8pm service will be operating in darkness for several hours each day, so the issue of personal security on passenger uptake and comfort should not be under-estimated. Note that walking to one's car when it is not directly outside the home is a different to catching a bus; one does not need to wait on the street for a period of time before getting into one's car. Similar applies to getting out of one's car on a return trip; should the driver feel threatened by the presence of any persons they happen to see in the street, they can drive off or wait for them to move on. The passenger alighting a bus does not have such options. Hence the onus is on those planning the infrastructure to see that it is sited away from positions that are overly secluded.

15. **Crossing points:** Farm Road is relatively lightly trafficked and benefits from traffic calming. The road is not overly wide, numerous crossovers afford informal crossing places for those pushing prams etc, and there will be frequent long-duration gaps in traffic suitable for even those with impaired mobility or poorer road skills to make crossing movements. While the equivalent proposals for stops on Clay Hill have included consideration of aiding crossing movements, officers do not feel Farm Road is sufficiently comparable in character for the provision of crossing facilities to be considered essential to adding bus stops.
16. **Dwelling buses occupying road space:** It can be estimated that buses will stop at each of the two positions around 20 times each day. In the era of cash-free travel, stopping events are brief, say thirty seconds each outside of particularly busy stops. At each of the two stops in Farm Road we can therefore expect a bus to be present for a total of around 10 minutes across the 1440 minutes that make up 24 hours. For the other 99% of the day, the marked area will be vacant, prohibiting occupation of the kerbside by any other vehicles and thus helping, rather than hindering, the flow of traffic.
17. **Footway space:** The footways being wide enough at both stopping positions for opposing pedestrians to pass, they should also prove wide enough, given this particular setting, for passing pedestrians to negotiate a route past anyone stood waiting. The Enfield bound stop has the narrower footway of the two. Here the paved area needs to be extended into the verge for a length of around 8m to form the boarding area, thus providing additional footway width at the location passengers would be waiting.
18. **Other nuisance factors:** The bus stop post is not illuminated so no glare applies to the infrastructure at the stops. It is acknowledged that the other factors are recurring concerns when consulting on new bus stops. Nevertheless, the principles set out above remain valid. It is correct for stops to be added to make the new bus service appealing and fully accessible despite the tendency for households to not want the stops near their own homes. There is fairness in placing them where they serve the passengers best rather than on trying to assess competing levels of domestic opposition that might be found along the street. There are over 500 bus stops in Enfield. Most are near homes and the placement of the two in Farm Road is not in any respect exceptional in terms of the degree of intrusion.
19. Government legislation grants highway authorities powers to place bus stops in the public highway without provision of compensation to adjacent premises, which may be seen as reflecting the view of society at large that the need to do so trumps the wishes of those living nearby and that their nuisance value is not so high as to warrant any reparation. The degree to which a householder may feel intimidated by the presence of persons at a bus stop should be weighed up against the same feeling of vulnerability that might be experienced by a passenger standing alone in the street whilst waiting at an overly secluded bus stop. By careful planning of the route and its stops the service becomes well used and the level of patronage by the well-intentioned majority deters nuisance behaviour by wrong doers.

### **(C) Objection to the bus route using Farm Road:**

20. A consultation and decision-making process on the introduction of the service and its chosen alignment has already been completed by TfL. While some residents dislike the outcome, no case has been submitted to suggest that either the process or the outcome was illegitimate. Enfield Council submitted comments to the 2019 consultation in support of the proposal, subject only to suitable proposals being found for any alterations required to its



24. **Speed humps:** Likewise, the route tests have not revealed any issues with the speed humps, which are neither numerous nor severe in their profile. Speed humps come in various forms. A guidance document published by TfL cautions highway authorities against planning speed humps on bus routes, lest those proposals prompt objections from TfL relating to passenger comfort etc. This does not amount to speed humps and buses being ruled mutually exclusive. Bus services and speed humps are seen to co-exist on roads such as Fox Lane, South Street, Main Avenue and Bounces Road and not to generate notable complaints from residents. In this case, with multiple route tests carried out, the humps are a known quantity and it can be said with certainty that the operator has no concerns with them.
25. **School run traffic:** Objectors point to the spike in traffic volumes at school times as making the use of Farm Road by buses unsuitable, referring to the proximity of schools off Highfield Road. Again, a road safety anxiety is mentioned. While nuisance school run activity generates numerous complaints to the department, notably due to congestion and inconsiderate parking, there is no demonstrable road safety problem associated with it in Enfield, whether sites are near or remote from bus routes. There are around 100 schools in the borough. Rather than being treated as bus exclusion zones, many schools benefit from bus services running along estate roads and directly past the gates; Bell Lane, Nightingale Road and Galliard Road are examples of roads that carry buses past fronting schools.
26. While it is true that the school run brings significant spikes in congestion across the network, this should not be a reason for not promoting sustainable and/or active travel in preference to pupils being driven directly up to school sites in cars. TfL's timetabling will account for peak period delays and these will apply on all streets, not only in Farm Road. The school run spike is, in any case, a relatively fleeting phenomenon on weekdays only, which is not a strong case for selecting routing options to avoid schools where those alternative routes would, at all other times, be less favourable.
27. **Bus routes in 'Quieter Neighbourhoods':** The Council's Healthy Streets Team sees no conflict with buses serving areas identified as current or future 'Quieter Neighbourhoods'. Fox Lane and Cranley Gardens carry buses on route W9 whilst also sitting within such a neighbourhood, for example. Rather, good public transport options offer residents within the areas further help in making less use of their cars, with this factor being what then allows active transport to flourish. The private car is the mode of transport that is most problematic in terms of poor air quality, high carbon emissions, poor space efficiency, nuisance parking, excessive noise, and supressing active travel due to traffic domination even on minor roads.



28. **Character of the street:** Two buses per hour each way is a reasonable degree of frequency to encourage bus patronage. However, the roughly 50 movements per day this adds up to in Farm Road is not excessive or character changing compared to the typical daily figure of nearly 1400 movements that was found (despite the pandemic) in an October 2020 survey. This figure included 65 vehicles per day classed as buses or trucks. It seems unlikely that this modest change in traffic levels could, as the petition claims, damage the residents' quality of life in any meaningful sense.
29. **Breach of human rights:** Farm Road, Firs Lane, Station Road and Church Hill are the four streets to be newly served by buses under the 456 service. While no other Enfield streets have been newly served by buses in recent years, across London the addition of streets to the bus network is not uncommon. In the year 2020 alone examples applied to Route 383, Route 384, and Route 324 in LB Barnet; and to Route 112 and Route 483 in LB Ealing. Given this information, and the traffic survey data above, and given the huge number of residential streets across London that carry bus services, the claim that the circa 50 buses per day on Farm Road would equate to a breach of human rights appears unfounded.
30. In addition to Cranley Gardens, Northern Avenue in the Haselbury area and Cadogan Gardens in Grange Park are further examples of existing streets that are short or narrow and carry little general through traffic but accommodate bus services, seemingly happily, nevertheless. Private Road in Bush Hill Park (a public road despite the name) is another example. Pennington Drive in Highlands carries buses but, being a loop, carries no through traffic, thus being quite the opposite of a main road. The department is not aware of any history of complaints about buses from these streets. All are public roads being maintained by public funds for the benefit of the travelling public in general, not just for the benefit of those currently living in the street.
31. Neither can it be accepted that the combination of factors applying to Farm Road makes it unique. Town Road, Edmonton is an example of a bus route that has modest traffic levels, a narrow carriageway, narrow footways, speed humps, narrow close fronting homes, almost no off-street parking and very few areas to act as parking overspill areas. The fact that, amongst these factors, it is only the relative shortage of parking that generates occasional enquiries would suggest that the presence of buses is less intrusive, once established, than objectors might claim or imagine in advance of the service commencing.

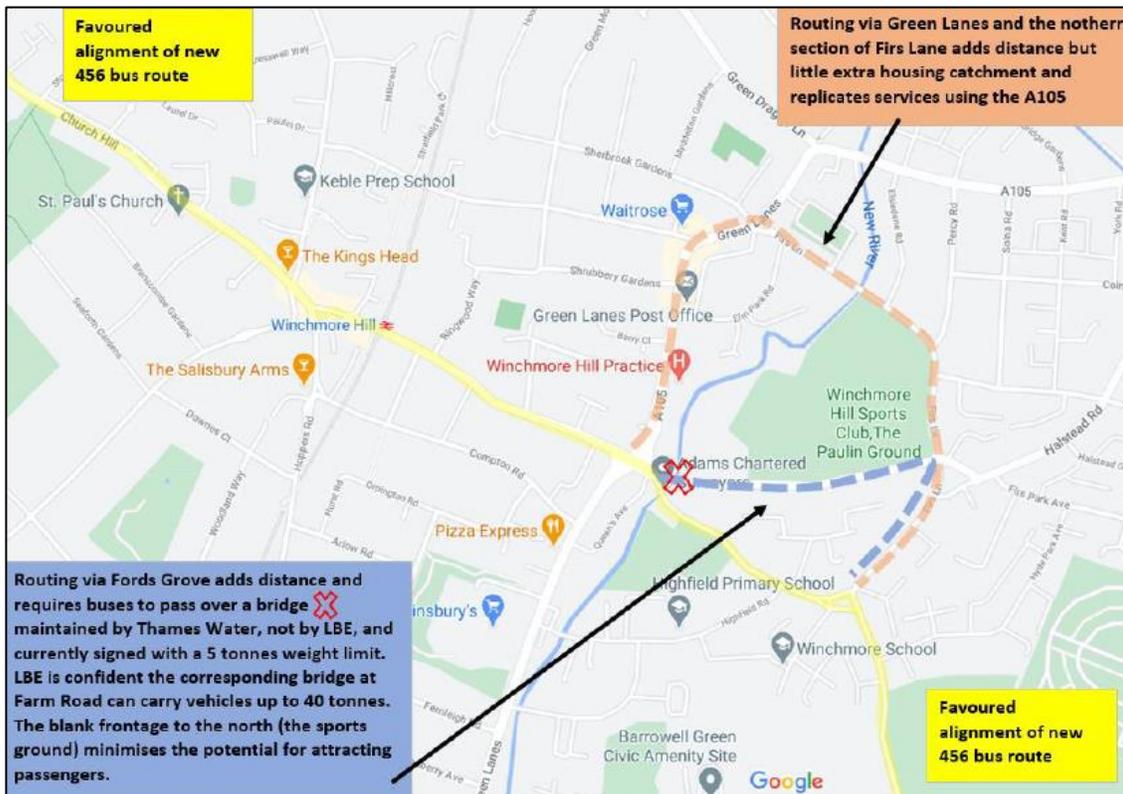


**(D) Alternative routes:**

32. The petition document stated that any of the following options would be a more logical or reasonable route for buses towards the hospital than along Farm Road:

- (i) Green Dragon Lane and northern section of Firs Lane
- (ii) Station Road and northern section of Firs Lane via Green Lanes dogleg
- (iii) Fords Grove
- (iv) Highfield Road
- (v) Green Lanes and full length of Hedge Lane
- (vi) Green Lanes and Barrowell Green

A strategic concept behind routeing the service via the Highlands and Winchmore Hill areas – rather than directly along Green Lanes - is to take the opportunity to bring unserved pockets of housing into close proximity to bus services. Its use of Church Hill, Station Road and Firs Lane is notable in filling certain residential ‘holes’ TfL’s analysis had identified in bus service provision.



33. **Green Dragon Lane:** Given that Green Dragon Lane already carries bus services, using this corridor to connect Highlands with Firs Lane misses the opportunity to bring new areas – i.e. the Church Hill and Station Road catchment - into close proximity to bus services, contrary to the strategy for the overall route.
34. **Station road to Firs Lane North:** The section using Green Lanes replicates existing services, failing to extend the catchment but risking additional bus-on-bus delays along the A105 corridor. TfL's analysis indicates that the dogleg introduced by using Green Lanes and the northern section of Firs Lane between Station Road and the Firs Farm wetlands area adds 1.05 miles to the total return mileage, relative to the more direct Farm Road option. With average London bus speeds being 9.2 miles per hour this would add almost 7 minutes to the bus's round trip.
35. TfL uses the total round trip time to calculate how many buses are needed in service across different periods of the week to maintain the intended 2 buses per hour frequency. For this route 4 buses are required in quieter periods, and 5 buses during more congested periods when the return trip will take them longer to complete. TfL calculates that even if the additional run time were only 6 minutes, it would tip the quiet periods into also requiring the 5-bus level of provision. TfL estimates that the additional running costs would amount to £53,000 per year, which changes the financial footing of the overall proposal.
36. While some objectors have claimed that TfL is thus imposing an unwanted alignment on Farm Road residents for the sake of more favourable economics, this argument overlooks TfL's obligations to consider the wider public benefits. The more direct the route, the more attractive the service will be to prospective passengers. The dogleg imposed on hospital-bound buses when turning left out of Station Road - rather than heading straight across - confounds passengers' perception of directness, as well as adding 7 minutes onto the timetable, thus lowering the appeal of the service. Hence appeasing residents of Farm Road by choosing this option adds to passenger journey time and risks the route carrying underfilled buses, which is of benefit to no one. Initiating a service in the knowledge that it might need to be swiftly withdrawn due to non-viability would, furthermore, be irresponsible.
37. Moreover, given that some residents further south on Firs Lane have also now signed petitions opposing the route, there is no guarantee that the section further north would be any better received than the routing along Farm Road has been. Under the same principle of fairness stated above, the route should be selected on the alignment that offers the best viability, the greatest coverage and the most benefit to passengers.
38. **Fords Grove:** The bridge at the western end of Fords Grove is maintained by Thames Water and has a signed weight limit of 5 tonnes. The one on Farm Road is maintained by Enfield Council, whose engineers confirm it is suitable for carrying vehicles up to 40 tonnes. The Fords Grove option must therefore be ruled out. It is, in addition, less direct than Farm Road and lacks homes along its northern side to boost its catchment.
39. **Highfield Road:** Like the Firs Lane North option, this replicates services on Green Lanes and is less direct than using Farm Road. The Green Lanes end has a no entry restriction on eastbound traffic at the bridge, but access traffic uses the main length of the street in both directions. Allowing suitable eastbound entry for buses only would not be simple to achieve and, in any event, many of the reasons cited by the petition for not using Farm Road apply equally to Highfield Road, if not more so.

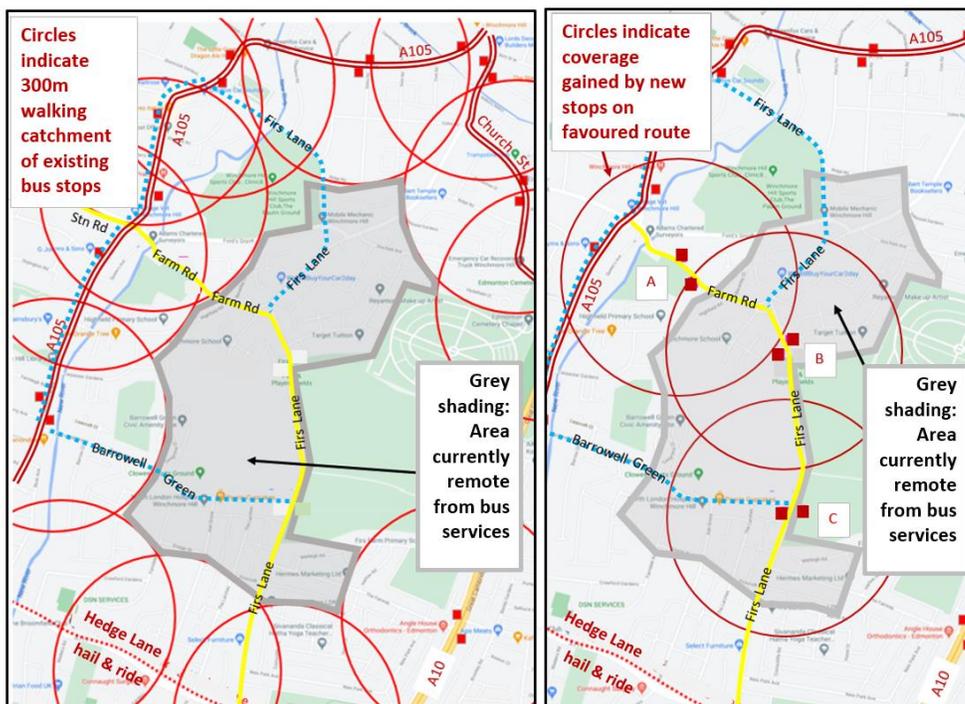


40. **Hedge Lane:** This option has the perceived benefit of avoiding introducing bus services along any new sections of street south-east of Station Road. Its corresponding drawback is in failing to bring the housing areas around Firs Lane into greater proximity to bus services. A second drawback is in replicating bus services along a 1.3 mile stretch of Green Lanes and Hedge Lane, again risking additional bus-on-bus delays along the A105 corridor. A third is that it is slightly longer and less direct than the route via Farm Road.

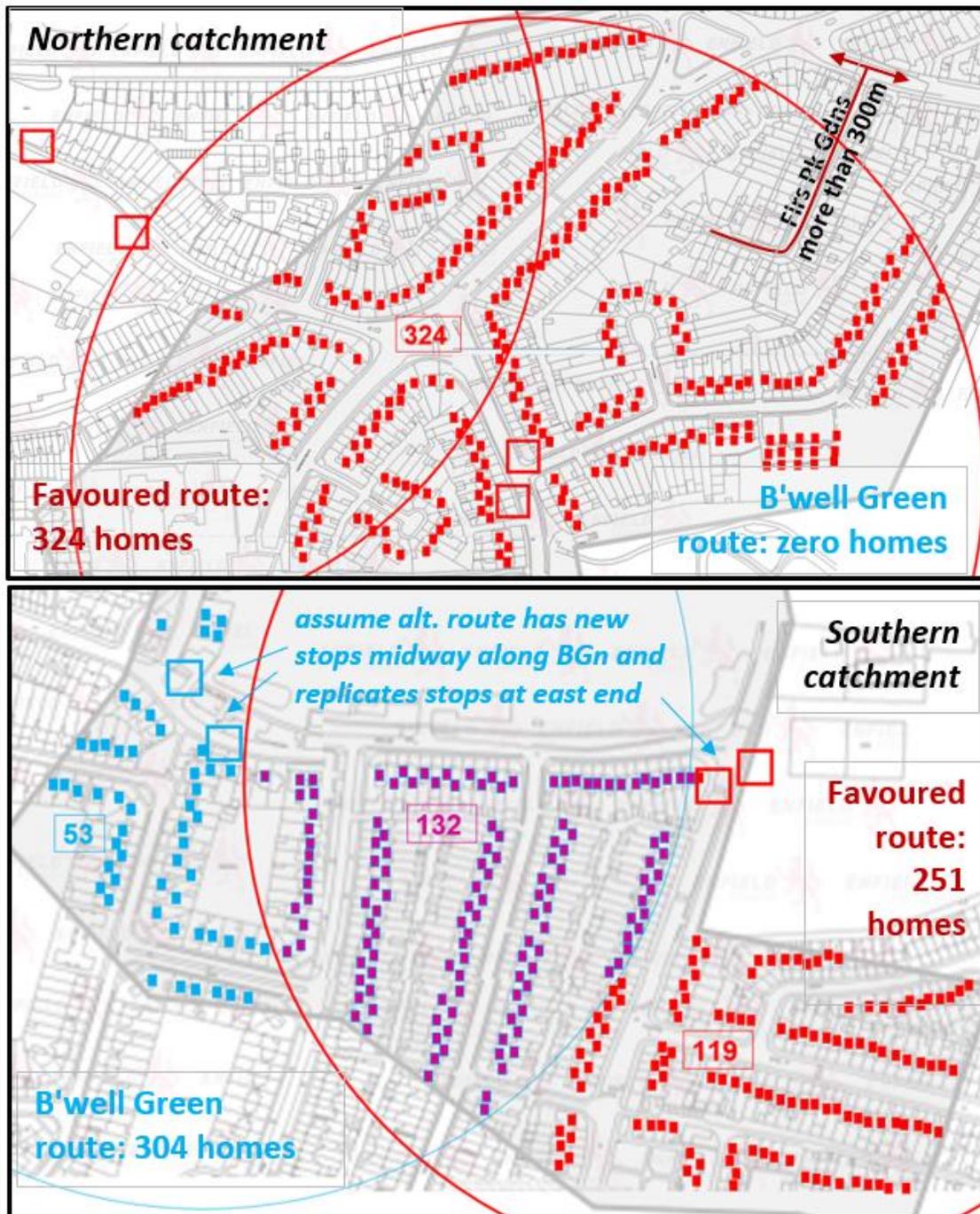
41. **Barrowell Green:** The petitioners offer this alternative as one that replicates Farm Road in terms of bringing bus services through the Firs Lane estate, but via a street they deem better suited to accommodate them. While it is true that Barrowell Green is wider and straighter, it also features road humps and some close-fronting homes (but not any formal crossing facilities) and therefore has some similarities to Farm Road in character. Were the Council to agree that Farm Road was not suitable to carry buses due to being residential in nature and due to its families valuing the relative absence of traffic compared to that found on main roads; it is hard to imagine Barrowell Green residents not responding that these notions applied to them more or less equally.



42. One drawback of using Barrowell Green is that the route is slightly longer and less direct than the Farm Road option (0.9 miles between the two points of divergence, versus 0.6 miles) and, again, risks bus-on-bus delays by duplicating services on the Green Lanes corridor. A second drawback is that the Farm Road option was chosen to fill both of two residential 'holes' in bus access in the Firs Lane area, one north of the wetlands, one to the south. While the Barrowell Green route could serve as a reasonable back-up option, it was not TfL's favoured route due to it diverting around the northern area rather than serving it.
43. Having now identified positions for the bus stops, the department has been able to undertake a more detailed comparison to calculate how many homes each option brings within 'short walking distance' of specific bus stopping positions. Note that this does not over-ride the desire to have stops spaced at less than 400m along a route, even where the catchments of some stops happen to overlap under this type of birds' eye view analysis.
44. The analysis is based on drawing catchment circles of 300m radius around all the existing bus stops on the enclosing corridors - Green Lanes, Church Street and the A10 – as well as indicating similar coverage for Hedge Lane's hail and ride service. The area (shaded grey in the mapping below) bounded by the perimeter route catchment circles is the unserved area of housing sitting beyond short walking distance of existing bus services. The distance of 300m is chosen, rather than the maximum desired 400m bus stop spacing figure quoted above, to reflect that not all homes within a circle are on a direct walking route to the stop.
45. Barrowell Green is 700m long. To meet spacing convention, a pair of stops would have been proposed midway along its length. The favoured option via Farm Road has one pair on Farm Road and another north of the wetlands, ideally near Hyde Park Avenue to maximise the coverage to the more eastern-lying homes. Both options would see a pair of stops on Firs Lane near its junction with Barrowell Green. This offers suitable stop spacing in both cases. Little is gained from the stops at Point C being further south, as the catchment already overlaps with the Hedge Lane hail and ride catchment along Hedge Lane.



46. The home-by-home level analysis seen below shows that the Farm Road option captures 324 homes from the northern 'hole' and 251 from the south, totalling 575. The Barrowell Green option does not capture new homes to the north on Firs Lane etc, due to the large area of open space separating the route from the nearest areas of housing. Its addition of 304 homes to the south better the Farm Road option by only 53 homes. Hence we can conclude that the Barrowell Green option brings 304 homes within short walking distance of a bus stop, but that this is only 53% of the 575 gains made by the favoured option.



47. Accordingly TfL's judgement appears sound in having chosen the option that is most direct, serves most homes and avoids duplicating services along Green Lanes. By those factors it is maximising the potential of the route to convert trips from car to bus; offering passengers along all parts of the route the optimum in accessibility, convenience and journey times; and minimising any bus-on-bus delays or confusion by duplicating other bus services on Green Lanes.
48. It can be seen that options that use the northern section of Firs Lane would offer some additional extension to the northern catchment under the same method of analysis. However the Green Dragon Lane variation misses out any gains in the entire Church Hill and Station Road catchment and the Station Road into Green Lanes dogleg option has been shown non-viable in terms of route length and costs, which is the more fundamental consideration.
49. Pegasus Court is a block of retirement homes at the northern end of Firs Lane, where it meets Green Lanes. Pegasus Court submitted an email to the Council stating they would welcome the route passing their premises to help their residents make use of the route. The rationale set out above explains why this routing option has not been chosen regardless of this support, but it should be noted that the entrance to Pegasus Court is only 40m from the existing southbound bus stop on Green Lanes, with northbound stops also close by, so it is already well served by the existing bus network in the more general sense.
50. The hospice on the corner of Barrowell Green and Ash Grove also emailed the Council stating that the bus route running past their premises would also be welcomed by their residents. This expression of support is not deemed to outweigh the drawbacks to the Barrowell Green option that are set out above. Happily, placing the pair of stops immediately at the eastern end of Barrowell Green, which was proposed to maximise the general catchment along the favoured route, leaves both of those stops no further than 220m from the hospice.

## **Part 2: Fixed Bus Stops and the Route Through Winchmore Hill**

51. The paragraphs above set out why the department believes TfL's judgment was sound in having selected Church Hill, Station Road, Farm Road and Firs Lane as its favoured routeing of the new service through Winchmore Hill. Route testing has generated no concerns and TfL completed its mandatory consultation process in April 2020. The consultation report indicates that the general response from contributors was positive and there appears to have been no legal challenge to TfL's decision nor any substantiated claims that the process was incomplete or improper.
52. TfL's report sets out its intention to introduce fixed bus stops on sections of the route that were previously unserved or that operated on a 'hail and ride' basis, referencing the streets named above explicitly and after ensuring all households along these streets were invited to comment via delivery of leaflets in 2019. TfL's report lists the benefits of fixed stops thus:
- (i) Easier boarding and alighting for some passengers with mobility issues
  - (ii) Safer journeys for customers and other road users
  - (iii) Improved route reliability and timetabling
  - (iv) Customer information through the provision of timetables at bus stops
  - (v) Greater certainty on when and where the bus will stop to allow people to board/alight

53. The department's position on fixed stops is that it generally favours introducing them, to improve upon hail and ride operation, whenever the opportunity allows. A recent example was the addition of fixed stops on the previously 'hail and ride' section of the W4 service along Tottenham Road etc. The department relies on TfL to take the lead in such proposals, to provide the funding, and to procure and install the bus stop posts, for which they remain custodian after their placement in the street.
54. The Equality Act 2010 sets out the principle of equal access to services and opportunities across protected groups, where this can reasonably be provided. A fixed stop ensures the following: (a) that the kerbs are high enough for proper deployment of the wheelchair ramp; (b) that the step between footway and bus floor is not overly high for the ambulant disabled or those in charge of prams, toddlers etc; and (c) that, for these users and all others, the bus can always pull in tightly to the kerb, rather than needing to deposit passengers in the road due to obstruction by parked cars. A network based largely on fixed stops is one in which a wheelchair user can set off on a journey with confidence that, wherever they end up alighting, they will be able to do so with ease and dignity.
55. By working in partnership with TfL to provide fixed stops the department is therefore helping the service provider achieve this position and abide by these regulations. The benefits listed above should also encourage greater uptake in bus usage and, given the declaration of the climate emergency, obligations upon the department to promote sustainable travel apply on these grounds also.
56. Accordingly the department is right to continue its work in identifying positions for fixed stops along the roads in question; to continue its consideration of comments submitted from nearby households thereon; and, while perhaps revising some proposals where necessary, to proceed with the intention that stops at the appropriate spacing will be introduced along the route, even where local opposition is encountered. Section 13 above reflects upon the reality that, despite the improvements they offer to the least able, proposals for new bus stops are almost always met with local opposition.
57. The merits and potential drawbacks of specific bus stop proposals on Church Hill, Station Road and Firs Lane will be the subject of future decision-making reports. The topic is covered here to address the general opposition to the bus route - and the general concept of having fixed bus stops - that has arisen in the Firs Lane area, outside of Farm Road.
58. In addition to localised objections being submitted to nine of the twelve bus stop positions, two petitions have been submitted indicating more general opposition to the route. Both petitions arise from residents on Firs Lane living near the stops proposed at Position B. (The mapping at section 45 shows the location.) Both make comments on the suitability of the specific bus stop proposals, which will be addressed elsewhere in due course.
59. Petition X bears 138 names and states that a full consultation on the matter of the route and the bus stops needs to be carried out by the Council. The petition author refers to a TfL leaflet received in December 2019 and quotes therefrom: "*subject to the outcome of this consultation about the proposed route LB of Enfield will consult locally on detailed proposals.*" In other words, TfL's leaflet was advising that should it decide to proceed with the route, it will be Enfield Council that then makes proposals about specific bus stops.
60. The petition author states this local consultation never occurred. That is not correct. It occurred in December 2020 in the form of letters to adjacent households near proposed

stops with the same information copied to elected representatives and certain community groups by way of wider community oversight. Far from there being any doubt this occurred, it is likely that it was exactly this communication with households around Position B that precipitated the petition.

61. The petition author continues: *“On 27 April 2020 TfL alleged to have consulted on proposals for a new bus route between Crews Hill and North Middlesex Hospital. The claimed to have received 513 responses. The residents of Firs Lane did not receive any information.”* However, we know with certainty that TfL did consult on the matter and that Firs Lane residents were included as this was done via the December 2019 leaflet; the very document the author admits to receiving and quotes from at section 59. This was the consultation upon the alignment and introduction of the route, which the report of April 2020 was later produced to summarise.
62. Hence while the signatories have the freedom to reiterate their opposition to the route it is not valid to base this petition calling for further consultation on the assertion that TfL did not consult on the route or that Enfield Council did not consult locally on the bus stops. It is well documented that both exercises took place.
63. The Petition X author queries how a bus route can coexist with a proposed Quieter Neighbourhood. Section 27 above addresses this. The author queries how around 50 buses per day would not blight the area with fumes etc. Section 28 sets out how even on the lightly trafficked Farm Road, 55 buses is not a significant traffic burden relative to the 1400 daily vehicles found in recent surveys. The petition author queries buses running near schools. Section 25 and 26 above address this issue. The petition author’s concerns about the congestion posed by dwelling buses hindering other traffic is specific to the bus stop layouts and will be addressed elsewhere.
64. Petition Y bears 43 names and seeks to understand *“why route 456 needs to cut across residential roads instead of going through a main road like Green Lanes where it can serve the wider community.”*
65. Sections 32 to 47 address the question above, touching upon the aspiration to extend bus services to areas currently remote from bus routes; to select the most direct, appealing route alignment for the good of all passengers within and beyond Winchmore Hill; and to avoid duplicating services on Green Lanes that risk adding bus-on-bus delays into the existing network operation.
66. The issue of buses hindering traffic and exacerbating congestion near schools features in Petition Y also. Again, some of this commentary relates to the specific bus stop proposals. The remainder is addressed above. The author of Petition Y poses the scenario of hospital visitors or staff driving to Firs Lane and leaving their vehicles parked for long periods whilst completing their journey by bus. This phenomenon could be monitored and potentially tackled with further parking controls. Such a concern could apply to any bus route, as all bus routes offer passage to destinations where a car driver would encounter parking controls. Accordingly, it is best addressed by proposals for the area in which it is found to occur, if it ever occurs, rather than speculatively as a prerequisite to a route being introduced. It is certainly not a good reason to forego running bus services.