

PL20/125 P - Farm Road Yellow Lines and Bus Route 456 Strategy

Response to Reasons for Call-In

Background

In 2019, Transport for London (TfL) undertook a consultation on a proposed new bus service: route 456 – the first new service in the borough for around 20 years. The proposed route is to extend the existing W10 service that links Crews Hill to Enfield Town; with buses continuing from Enfield Town to North Middlesex Hospital via Highlands, Winchmore Hill and Firs Lane. TfL's consultation leaflet was distributed in 2019 and included reference to supplementary proposals for yellow lines (in Farm Road) and bus stops (Farm Road and others) to follow if the route were to go ahead.

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 that have previously gone unserved.

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 as planned.

Whilst TfL do not need the Council's permission to route the bus via Farm Road, the introduction of associated waiting restrictions requires the making of a traffic management order by the Council in its capacity as the local traffic and highway authority. The procedure for making traffic orders is set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996, and includes a requirement to advertise its intention to make such orders and allow a minimum period of 21 days for objections and representations to be made.

The Council subsequently developed the proposals set out in Appendix A of the report and published the draft traffic management orders and commenced the statutory consultation in September 2020.

The Portfolio report PL20.125 P set out and considered in detail the various objections and representations, with the decision made on 2 March 2021 to proceed with the making of the necessary traffic management orders to support the implementation of the scheme set out in Appendix B of the report.

Comments on Reasons for Call In

Comment 1:

Negative impact of yellow lines and loss of parking spaces.

Response:

The report addresses this issue in some detail, notably at Appendix C sections 3 to 7.

Significant changes to the extent of the parking controls have been made in response to comments from residents. The original arrangement of proposed double yellow lines fell across the frontage of 30 homes, four of which, referring to our survey, lacked frontage parking.

The revised double yellow lines cover only 10 homes, none of which lack frontage parking. Three of these homes fall near the traffic island at the Firs Lane end of the street. Here the proposals are needed in any event to ensure the passage of larger vehicles around the island, whether buses are present or otherwise.

The report refers to the relatively high levels of parking capacity that applies at Farm Road, with most homes having off-street parking. There is also a 90m length of blank frontage where the single yellow line is proposed that could serve as overspill area for around 15 -18 cars, and Fords Grove car park would also serve as an option for free overnight parking, if only as a back-up choice.

Considering the 34 properties on the northern side of Farm Road, the length of kerbside across their frontages that the proposals leave unrestricted equates to 26 spaces, should residents take advantage of the facility to park across their own dropped kerbs. For the same set of homes, the additional number of off-street spaces in frontage areas or garages is estimated at over 50 spaces.

Not counting the section of yellow line near the island, where the homes belong to Firs Lane, it is acknowledged that roughly eight parking places are lost as part of the scheme. However, the Council must balance the various competing demands for road space and the proposed double yellow lines are the minimum necessary to give confidence that buses will not be unduly delayed.

Whilst not essential to the operation of the new bus service, the proposed one hour single yellow line is proposed to make it easier for residents rather than commuters to utilise the affected kerbside space.

Comment 2:

Loss of on street parking spaces from the proposed yellow lines will result in residents parking further away from their properties. This will impact elderly residents, families with small children and residents with disabilities.

Response:

The points above address this. The residents will retain reasonable levels of parking capacity directly outside their homes and at nearby sections of kerbside.

Comment 3:

The report fails to take into account that it is highly unusual for petitioners and other people's objections to include an alternative course of action in the detail that residents have done in this case. It acknowledges the alternative course of action

but fails to consider that it is unusual in council consultations for an alternative course of action is submitted in this detail.

Response:

The group-objection from Farm Road was notable in including six alternative route options for the bus service. The way the report demonstrates that due regard to this has been given is by addressing and analysing each alternative carefully, but ultimately concluding that the Farm Road option is the best available. It is implicit in the length and detail of Appendix C in addressing concerns that the comments received were both numerous and detailed.

Comment 4:

The level of opposition from residents, councillors and MP- has not been taken on board. Fifty households on Farm Road are opposed. There is also opposition from Station Road and Firs Lane residents.

Response:

The report sets out that the petition was signed by 40 households on Farm Road, concluding that most of the circa 50 households were in opposition. The report documents the level and spread of opposition faithfully, and also covers the supplementary concerns from Station Road and Farm Road. It is the detail included within the report that further demonstrates that this opposition has been taken on board.

Comment 5:

The report in paragraph 28 seems more concerned with reputational damage to the council with the Mayor than it does Farm Road residents' views.

Response:

Paragraphs 27 and 28 of the report summarise the main considerations for the Council, with paragraph 27 highlighting the level of opposition from residents, as set out at length elsewhere in the report. The proportion of the report given over to covering the views of residents and responding to their concerns reflects the degree of consideration given.

Paragraph 28 briefly sets out some of the other considerations that need to be taken into account, one of which is reputational damage to the Council.

Comment 6:

The report does not reflect on the fact that the original consultation on the bus route that requires the stops and yellow lines was carried out two years ago

Response:

The report sets out in paragraphs 7-9 the timeline for the TfL decision-making process that came before, making it clear that a period of time has elapsed between the two. It is also important to bear in mind that the two consultations are separate, with TfL's consultation establishing the alignment of the new route and the Council's statutory consultation relating specifically to the traffic order required to introduce additional parking controls.

Comment 7:

The trial period for a no waiting experiment in a residential road such as this does not need to 18 months, (which is the maximum permitted under the law). The report does not specify why 18 months is required as nine months is adequate time to measure the effectiveness of an hour restriction Mon to Fri on a relatively short stretch of road.

Response:

The report states that a subsequent decision on making the trial permanent must follow within 18 months. It does not state that it needs to be conducted over this full period. In fact, a minimum consultation period of just six months is required before the experimental length of single yellow line could be made permanent. However, should it be clear that the trial is of little or no benefit, it could be removed sooner.

Comment 8a:

Bus stops: we understand the general point about distances between stops, but this obviously not fixed and as can be seen on any bus route, is subject to a flexible approach. In this case Farm Road does not generally experience high footfall, so in reality the main customers in Farm Road would be expected to be residents of the road, but many have said (as reported) that they neither need or want bus stops in the road, but particular not at the proposed locations.

Response:

The report makes the point that an opposition to the new routing – even if it were consistent across every household in the street – cannot be considered a guarantee that bus stops will go unused in the future and therefore justify leaving deliberate gaps in provision. Paragraph 10 of Appendix C sets out why stops in Farm Road are considered important.

In terms of the positioning of the stops, care has been taken to site them away from directly fronting homes, without leaving them poorly spaced or making them overly secluded. Appendix C (13 and 14) and the EqIA state set out the potential risks associated with stops not being well overlooked.

Comment 8b:

Their reasons are not “NIMBY” as such but based on genuine and well-articulated concerns. In this connection, para 22 of the main report correctly states that the law requires all written objections/ representations to be considered conscientiously. The tone and some of the content of appendix C (discussion of objections and representations) is faintly dismissive and patronising of some of the representations. (see paras 5,10, 11, 18, 28 & 36).

Response:

It is clear from the length and detail within the report that representations have been considered in detail, conscientiously and not dismissively. As required, the objections and representations relating to the making of the traffic order have been fully considered and taken into account in coming to the decision, as have the comments on bus stops and other issues.

Comment 9:

It is wrong to use Parking controls as a tool to dissuade car use as is openly admitted in para. 26 of the main report. Parking controls are intended to regulate the use of road space.

Response:

The report states, referring to the supplementary proposal for single yellow lines to favour residents over others, that a further public benefit applies to disincentivising car use by commuters. This is in keeping with the powers provided by the relevant legislation to regulate the use of roads and parking places in the Borough.

Comment 10:

The calculation of bus hours in Farm Road contained in the report is erroneous because the proposed bus service is not a 24 hour one.

Response:

The report does not contain calculations based on the service operating for 24 hours. The hours of the timetabled service are stated correctly as 7am to 8pm with a 2-buses per hour frequency. In paragraph 16 of Appendix C, to provide context, there is reference to a dwelling bus in Farm Road being present for just 10 minutes of the 1440 minutes that make up 24 hours.