

## Fox Lane Area Quieter Neighbourhood – Response to Objections

### 1 Objections raised

Objections have been taken from all communications throughout the consultation period. This annex is in addition to the main report and other supporting documents that form part of the report, which should also be considered as they also provide an indirect response to many of the themes raised. Objections raised broadly fell into the groupings below. Some may fall across more than one category but have only been listed once.

- Motor traffic and traffic related impacts, and environmental impacts
- Physical and mental health and / or safety
- Equalities
- Process and decision making of the project
- Communications and engagement
- Design and infrastructure
- Miscellaneous

### 2 Motor traffic and traffic related impacts, and environmental impacts

<b>Ref</b>	<b>Objection based on the grounds that:</b>	<b>LBE response</b>
2.1	There has been a reduction in mobility within, and access to, the area including for disabled people, the general population and older people	It is proposed that a subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities.
2.2	There has been an increase in journey times, including specific references to: <ul style="list-style-type: none"> <li>• Increases in fuel bills or higher taxi fares.</li> <li>• Negative impacts on residents' ability to work / arrive to work on time</li> <li>• Negative impacts on providing or receiving care, due to the carer having less time before / after</li> </ul>	<p>The Council accept that some individual journeys that continue to be taken by private car may be longer than the same journey prior to the trial.</p> <p>It is proposed that a subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities.</p>

	<p>travelling, being unable to perform duties, or ending their employment due to time it takes to travel to patient</p> <ul style="list-style-type: none"> <li>• Students' and childrens' education being negatively affected by increased journey times</li> <li>• Negative impact on essential workers' journeys particularly during the COVID-19 pandemic</li> <li>• Inconvenience to everyday lives of residents</li> </ul>	<p>Overall journey times will continue to increase if motor vehicle use continues without enabling other alternative forms of travel. If more people are enabled to walk or cycle for some of their short journeys, then this will free up road capacity for those on longer journeys or those journeys that are not practical for walking / cycling.</p>
2.3	<p>There has been an increase in air pollution and no mitigation against this. Related points included:</p> <ul style="list-style-type: none"> <li>- Walking and cycling in the area is less pleasant</li> <li>- Residents are affected within their homes and properties from fumes from nearby roads</li> <li>- Negative impact on children and vulnerable people</li> <li>- Has caused health problems such as breathing issues</li> </ul>	<p>Air quality has been assessed as part of the monitoring of the trial. Local air quality monitoring includes two diffusion tubes; one situated on Aldermans Hill at Devonshire Road and one on Winchmore Hill Road near Southgate Circus. An air quality assessment was carried out by an external agency and is attached at Appendix 5. Overall, whilst the scheme leads to changes in pollutant concentrations, the scale of the change in relation to total predicted concentrations are sufficiently small to lead to no significant effect, neither beneficial nor adverse.</p> <p>Further detail can be seen by referring to 'Air quality' section in Table 1 of the main report.</p>
2.4	<p>There has been little to no impact on air pollution which does not justify the scheme</p>	<p>An air quality assessment was carried out by an external agency and is attached at Appendix 5. Overall, whilst the scheme leads to changes in pollutant concentrations, the scale of the change in relation to total predicted concentrations are sufficiently small to lead to no significant effect, neither beneficial nor adverse.</p> <p>Key objectives of the project were to create healthier streets within the area, significantly reduce the volume of through motor traffic and enable a longer-term increase in walking and cycling levels.</p>

		<p>With transport accounting for 39% of the Borough's emissions, it is essential that this sector plays a key role in moving towards the goal of being a carbon neutral Borough by 2040. The Healthy Streets programme consists of a comprehensive range of interventions that collectively will enable more sustainable transport choices. As projects are knitted together and a coherent network of quiet streets and safe walking and cycling infrastructure on primary roads is delivered, longer-term change will be enabled.</p>
2.5	Traffic has increased within and surrounding the area, or has been displaced	<p>Traffic volumes have been monitored in a number of locations in the area. Detailed analysis of the pre and post implementation traffic volumes are included in Appendix 1 and discussed in Table 1 of the main report.</p> <p>Acknowledging the limitations in the data and the unprecedented impacts of the pandemic the traffic data does not suggest that the trial should not be made permanent.</p>
2.6	The scheme has had little or no impact on traffic volumes and speeds within and surrounding the area	<p>Traffic volumes and speeds have been monitored in a number of locations in the area. Detailed analysis of the pre and post implementation traffic volumes are included in Appendix 1 and discussed in Table 1 of the main report.</p> <p>Acknowledging the limitations in the data and the unprecedented impacts of the pandemic the traffic data does not suggest that the trial should not be made permanent.</p>
2.7	The increase in congestion as a result of the QN has negatively affected people's ability to use public transport, namely bus journey times	<p>Bus journey times in the area have been analysed and details of this is included in Appendix 1 and discussed in Table 1.</p> <p>Acknowledging the role of public transport in encouraging sustainable travel alongside active travel, the Council has identified the following interventions to be developed should the trial be made permanent. These include reviewing:</p>

		<ul style="list-style-type: none"> <li>• Pinchpoints caused by short sections of kerbside parking along Cannon Hill and Aldermans Hill</li> <li>• Introducing fixed stops along sections of Hail &amp; Ride to limit the number of stops and improve accessibility (W9 along Fox Lane, and W6 along Hedge Lane)</li> <li>• Signal timings at key junctions in the area</li> </ul> <p>The above first two listed proposals would result in the removal of short sections of parking along the bus corridors and be subject to consultation. Interventions identified as part of a review of Southgate Circus discussed in paragraph 39 of the main report would also be expected to improve bus journeys that are impacted by congestion at Southgate Circus.</p> <p>The Council will continue to work with TfL to identify ways in which bus journey times can be improved across the Borough and continue to review bus journey times in the area as part of the commitment to post-project monitoring.</p> <p>The impacts on bus journey times identified, when considered in isolation, are not considered to be significant enough to not make the scheme permanent.</p>
2.8	The increase in congestion as a result of the QN has negatively affected people's ability to travel actively such as by walking and cycling	<p>One of the aims of projects such as this is to create a network of streets that when connected together will enable the development of safe routes for walking and cycling on quiet streets. Where space allows, and as part of the development of a wider network, this approach can be complemented by segregated cycling facilities on primary roads. It should be acknowledged that changing travel behaviours is part of a longer-term programme that the Council is pursuing. The data suggests that the project shows increases in cycling levels. As more projects are connected the aim is to increase walking and cycling levels further.</p>

2.9	Enfield refuse collection vehicles have trouble accessing properties	Access for Waste Services have been discussed with the appropriate departments. The potential increase in ANPR filters could improve access. This will be the subject to ongoing internal review.
2.10	Emergency services have experienced delays and obstructions	Communication has taken place prior and post implementation of the project. Any impact on the emergency services has been carefully considered and is set out in Table 1 of the main report. None of the emergency services have objected to the traffic orders being made permanent.
2.11	It is harder to access healthcare including doctor surgeries and local hospitals, or for health providers and carers to gain access to patients	It is proposed that a subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities.
2.12	There has been a negative impact on local businesses and delivery companies in relation to their ability to deliver goods and services	<p>All properties, including businesses within the QN remain accessible by private motor vehicle, whilst the route taken to access a property or business may be different than before the trial was implemented.</p> <p>As part of the implementation of the project, the Council have invested in technological solutions to ensure that updates are effectively made to commercially available navigation solutions such as google, TomTom and Bing.</p>
2.13	The volume of non-residential traffic cutting through the area had increased or not changed	<p>Traffic volumes have been monitored in a number of locations in the area. Detailed analysis of the pre and post implementation traffic volumes are included in Appendix 1 and discussed in Table 1 of the main report.</p> <p>The design of the QN limits the ability for non-residential traffic to cut through the area. Traffic volumes on the surveyed local roads within the QN have reduced by an average of 72%. Key to this reduction is the restriction to through traffic.</p>
2.14	People who drive cars pay road tax and should be able to use all roads in the QN	All roads in the area remain accessible by motor vehicle. Motor vehicle owners pay an emissions duty (where applicable).

2.15	Tradespeople and taxis struggle to access properties	<p>All properties within the QN remain accessible by private motor vehicle, whilst the route taken to access a property may be different than before the trial was implemented.</p> <p>Council met with the Secretary of the National Union of Rail, Maritime and Transport Workers (RMT) to discuss the Quieter Neighbourhood project. At this meeting, it was explained to project team members that there was a perception among some taxi drivers that some roads were closed and unable to be accessed. The project team members clarified that the roads remain open, and every address remains accessible by private motor vehicle.</p>
2.16	Traffic parked along roads including Bourne Hill obstructs traffic flow	<p>This is not considered a reason in itself to not make the scheme permanent. If, however, the trial is made permanent, pinch points along Bourne Hill will be reviewed in addition to Cannon Hill and Aldermans Hill which have been identified in Table 1 of the main report.</p>
2.17	The increased traffic has led to an increase in noise in the area	<p>Noise in the area has been assessed and details of this is included in Appendix 4 and discussed in Table 1.</p> <p>The assessment shows that the effect of the scheme on road traffic noise on the internal roads of the QN has been largely beneficial. On the surrounding roads, the calculated changes in road traffic are broadly negligible.</p>
2.18	The QN has led to drivers becoming impatient and acting unsafely, including reversing down roads and speeding up at traffic lights	<p>Drivers are responsible for their own behaviours and naturally should be driving responsibly and in accordance with the Highway Code.</p>
2.19	There has been an increase in traffic accidents as a result of the increase in traffic / poor driver behavior caused by the QN	<p>A personal injury collision search has been completed post-implementation. Whilst a trend cannot be established based on just the 10 months of available data, the information available to date does not suggest the Fox Lane QN has had a significant negative impact on personal injury collisions.</p>

		<p>A summary of the personal injury searches and associated plans are included in Appendix 6 of the main report.</p>
2.20	<p>The QN has led to queues / tailbacks of traffic at junctions and traffic lights</p>	<p>Bus journey times in the area have been analysed and details of this is included in Appendix 1 and discussed in Table 1. As buses in the area have limited to no priority measures, changes in queues at junctions will be evident in the bus journey time data.</p> <p>Acknowledging the role of public transport in encouraging sustainable travel alongside active travel, the Council has identified the following interventions to be developed should the trial be made permanent. These include reviewing:</p> <ul style="list-style-type: none"> <li>• Pinchpoints caused by short sections of kerbside parking along Cannon Hill and Aldermans Hill</li> <li>• Introducing fixed stops along sections of Hail &amp; Ride to limit the number of stops and improve accessibility (W9 along Fox Lane, and W6 along Hedge Lane)</li> <li>• Signal timings at key junctions in the area</li> </ul> <p>The above first two listed proposals would result in the removal of short sections of parking along the bus corridors and be subject to consultation. Interventions identified as part of a review of Southgate Circus discussed in paragraph 39 of the main report would also be expected to improve bus journeys that are impacted by congestion at Southgate Circus.</p> <p>The Council will continue to work with TfL to identify ways in which bus journey times can be improved across the Borough and continue to review bus journey times in the area as part of the commitment to post-project monitoring.</p>

		The impacts on bus journey times identified, when considered in isolation, are not considered to be significant enough to not make the scheme permanent.
2.21	There has been damage to grass verges as a result of people driving making U-turns to avoid modal filters	<p>As part of the implementation of the project, the Council have invested in technological solutions to ensure that updates are effectively made to commercially available navigation solutions such as google, TomTom and Bing.</p> <p>We expect that over time as drivers adjust to the changes, the number of occurrences will decrease. Further protection of grass verges can be considered if there are areas identified where there are ongoing issues.</p>
2.22	Main roads around the Quieter Neighbourhood are not designed to carry large volumes of traffic which is happening as a result of the QN	<p>Government guidance<sup>1</sup> on roads classification states:</p> <ul style="list-style-type: none"> <li>• “The system of roads classification is intended to direct motorists towards the most suitable routes for reaching their destination. It does this by identifying roads that are best suited for traffic.</li> <li>• All UK roads (excluding motorways) fall into the following 4 categories: <ul style="list-style-type: none"> <li>• <i>A roads – major roads intended to provide large-scale transport links within or between areas</i></li> <li>• <i>B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network</i></li> <li>• <i>classified unnumbered – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to ‘minor</i></li> </ul> </li> </ul>

<sup>1</sup> <https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-primary-route-network/guidance-on-road-classification-and-the-primary-route-network>



		<p><i>roads' on an Ordnance Survey map and sometimes known unofficially as C roads</i></p> <ul style="list-style-type: none"> <li>• <i>unclassified – local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category”</i></li> </ul> <p>With reference to the above, the key routes in the vicinity of the Fox Lane QN are:</p> <ul style="list-style-type: none"> <li>• A1004 High Street / The Green / Cannon Hill / Aldermans Hill</li> <li>• A105 Green Lanes</li> <li>• A111 The Bourne, Bourne Hill</li> </ul> <p>The main roads are therefore most suited to carrying higher volumes of traffic.</p>
2.23	<p>Driveways are now being used as a turning point for traffic unable to pass through modal filters</p>	<p>Double yellow lines were implemented as part of the works in the area to provide space for turning vehicles.</p> <p>As part of the implementation of the project, the Council have invested in technological solutions to ensure that updates are effectively made to commercially available navigation solutions such as google, TomTom and Bing.</p> <p>We expect that over time as drivers adjust to the changes, the number of occurrences will decrease.</p>
2.24	<p>The longer queues as a result of the QN has caused long idling periods for vehicles, in turn causing pollution</p>	<p>Air quality has been assessed as part of the monitoring of the trial. Local air quality monitoring includes two diffusion tubes; one situated on Aldermans Hill at Devonshire Road and one on Winchmore Hill Road near Southgate Circus. An air quality assessment was carried out by an external agency and is attached at Appendix 5. Overall, whilst the scheme leads to changes in pollutant concentrations, the scale of the change in</p>

		<p>relation to total predicted concentrations are sufficiently small to lead to no significant effect, neither beneficial nor adverse.</p> <p>Further detail can be seen by referring to 'Air quality' section in Table 1 of the main report.</p>
2.25	Long roads have been turned into cul-de-sacs with inadequate turning heads and dangerous 3-point-turns are occurring	<p>Double yellow lines were implemented as part of the works in the area to provide space for turning vehicles. A further review of the length of Double Yellow lines can take place in any areas where specific problems are identified. Likewise, enforcement activity can focus on any areas where parking on Double Yellow lines is a repeat issue.</p>
2.26	Traffic including motorists and cyclists make it unsafe for the general population and children	<p>A personal injury collision search has been completed post-implementation. Whilst a trend cannot be established based on just the 10 months of available data, the information available to date does not suggest the Fox Lane QN has had a significant negative impact on personal injury collisions.</p> <p>A summary of the personal injury searches and associated plans are included in Appendix 6 of the main report. The reduced traffic volume and speed of motor vehicles within the QN area is likely to improve the overall environment for children.</p>
2.27	The QN is unsafe for cyclists	<p>A personal injury collision search has been completed post-implementation. Whilst a trend cannot be established based on just the 10 months of available data, the information available to date does not suggest the Fox Lane QN has had a significant negative impact on personal injury collisions.</p> <p>A summary of the personal injury searches and associated plans are included in Appendix 6 of the main report. The reduced traffic volume and speed of motor vehicles within the QN area is likely to improve the overall environment for cycling on these roads.</p>

2.28	Large vehicles (HGVs, lorries and refuse vehicles) are forced to make dangerous manoeuvres	Additional Double Yellow lines have been added to assist with vehicle turning at filter points. Reversing maybe appropriate for some vehicles movements. Council waste vehicles are equipped with cameras to assist with various movements with other operatives supporting.
2.29	Lorries use the railway bridge in Broomfield Lane as an alternative route even though it is supposed to be weight limited	Further traffic management measures can be considered, along with increased enforcement where appropriate.
2.30	There has been a lack of an assessment of the impact of the QN on businesses	The consultation enabled respondents to identify themselves as business owners and to outline the impacts they feel the projects have had on them / their business. Follow-up conversations were held with businesses owners in the vicinity of the Fox Lane Quieter Neighbourhood to further understand the issues raised.
2.31	Parking issues have been created in the area	A relatively small number of responses raised concerns about the impact of the scheme on on-street parking, for instance either side of the Fox Lane No Motor Vehicle restriction. None of the impacts raised have had a significant impact on either safety or the free flow of traffic. Any localised issues can be addressed by the introduction of additional waiting restrictions, subject to completion of the necessary statutory procedures.
2.32	There has been a negative impact on Palmers Green High Street and the local economy due to inability to park and visit local shops	The project does not significantly impact parking opportunities in high street areas. This <sup>2</sup> research published by TfL, shows improvements to make it easier and safer to walk and cycle in London's town centres and high streets lead to an increase in retail rental values, more retail space being filled and a 93% increase in people walking in the streets. The research also found that people walking, cycling and using public transport spend the

<sup>2</sup> <https://tfl.gov.uk/info-for/media/press-releases/2018/november/getting-more-people-walking-and-cycling-could-help-save-our-high-streets>

		most in their local shops, spending 40% more each month than car drivers.
2.33	Cycle lanes in the area make congestion worse	This appears to be an objection on previously delivered cycle lane projects, rather than this Quieter Neighbourhood project. The Council remain committed to protective cycle lanes on busier roads, to help protect these vulnerable road users.

### 3 Physical and mental health and / or safety

Ref	Objection based on the grounds that:	LBE response
3.1	The QN has damaged residents' physical health, such as by aggravating breathing conditions due to an increase in pollution	An air quality assessment was carried out by an external agency and is attached at Appendix 5. Overall, whilst the scheme leads to changes in pollutant concentrations, the scale of the change in relation to total predicted concentrations are sufficiently small to lead to no significant effect, neither beneficial nor adverse.
3.2	The QN has caused damage to residents' mental health, including feeling trapped or isolated	Whilst it is acknowledged that some people may feel this way, the project aims to increase the sense of community within the area and to encourage more interaction between neighbours in an environment that is not dominated by motor traffic. It is acknowledged that this project has been delivered during the pandemic and the increased isolation that this is likely to have created.
3.3	<p>Crime has increased and people feel unsafe</p> <ul style="list-style-type: none"> <li>• women who feel unsafe walking in the QN at nighttime</li> <li>• elderly and vulnerable people who are targeted</li> <li>• generally due to moped/scooter/motorbike related crime</li> </ul>	The Council acknowledges that some people have reported feeling less safe in the area due to crime. Crime data has been reviewed to see if there are any underlying trends in the data which may indicate negative changes in the crime landscape. Public mappable Police data has been reviewed in the Fox Lane QN area and the Southgate Green, Winchmore Hill, Palmers Green and Southgate wards. The QN is made up of these four wards which have seen the following changes +5% (Southgate Green), +5% (Winchmore Hill), +3% (Palmers Green) and -11% (Southgate). Within the specific QN area there has been a small change of +3%.

		Details of the crime date, including a breakdown of offences by category, is included in Appendix 3 of the main report.
3.4	The QN poses a potential risk to life	Based on the available information set out in Table 1 of the main report, the Council does not consider the QN poses a higher risk to life than before the QN was implemented.
3.5	Residents' sleep has been negatively affected by the QN	<p>Whilst we cannot determine the specific reasons for these reports, nighttime noise levels have been assessed.</p> <p>Noise in the area has been assessed and details of this is included in Appendix 4 and discussed in Table 1.</p> <p>The assessment shows that the effect of the scheme on road traffic noise on the internal roads of the QN has been largely beneficial. On the surrounding roads, the calculated changes in road traffic are broadly negligible.</p>
3.6	The QN has caused stress for drivers and encouraged aggressive behavior when driving	Drivers are responsible for their own behaviours and naturally should be driving responsibly and in accordance with the Highway Code.
3.7	There has been an increased cost to residents for petrol/fuel, which has been particularly impactful on those who require their vehicle due to mobility and health issues, work, or family/caring responsibilities	It is proposed that a subsequent report is to be produced as soon as possible which explores mitigation measures to improve access for residents with disabilities through potential exemptions and includes consideration of those with caring responsibilities.
3.8	Financial impact on people who receive PCNs as a result of poor signage / fines are excessively expensive	The signage at the camera enforced modal filters is fully compliant with relevant guidelines. Fees are not considered excessive.
3.9	A sense of privacy has been lost due to the traffic idling directly outside of homes	The Council does not consider that changes in traffic management has had a significant impact on residents' privacy.

3.10	<p>Friends and family find it harder to visit the area which has contributed to</p> <ul style="list-style-type: none"> <li>• social isolation and loneliness</li> <li>• challenges in relation to caregiving and childcare</li> <li>• mental health issues</li> </ul>	<p>It was anticipated that there would be a period of time for residents and their visitors who travel by private car to adjust to the changes.</p> <p>For those who continue to visit the area by motor vehicle, all properties within the QN remain accessible by private motor vehicle, whilst the route taken to access a property may be different than before the trial was implemented.</p> <p>As part of the implementation of the project, the Council have invested in technological solutions to ensure that updates are effectively made to commercially available navigation solutions such as google, TomTom and Bing.</p> <p>It is acknowledged that this project has been delivered during the pandemic which has created issues of isolation and associated mental health issues.</p>
3.11	<p>There have been over 100 reported crimes in N14 every month since August 2020 and the QN has contributed to this</p>	<p>Public mappable Police data has been reviewed in the Fox Lane QN area and the Southgate Green, Winchmore Hill, Palmers Green and Southgate wards. The QN is made up of these four wards which have seen the following changes +5% (Southgate Green), +5% (Winchmore Hill), +3% (Palmers Green) and -11% (Southgate). Within the specific QN area there has been a small change of +3%.</p> <p>Details of the crime data, including a breakdown of offences by category, is included in Appendix 3 of the main report.</p>

#### 4 Equalities

Ref	Objection based on the grounds that:	LBE response
4.1	The QN has negatively affected BAME groups	The decision report contains the equality impact assessment where the impact on race is considered.

4.2	The equalities impact assessment was conducted poorly / is low quality	The equality impact assessment is attached as an appendix to the report. It has been updated from a number of sources including census data, ward profiles, TfL research, academic research, focus groups, questionnaires and email feedback. It forms a comprehensive assessment.
4.3	The Equalities Duty was not fully considered	The decision report contains the equality impact assessment for consideration by the decision maker when they make the decision.
4.4	The streets in the QN are not fit for disabled people	Roads across the Borough are reviewed for their condition and upgrade works are prioritised and considered in relation to funding available. Residents can notify the council of any particular concerns via the 'report it' function of the Council website and further assessments can take place.
4.5	The QN has caused health inequality (amongst residents who live within the QN compared to on surrounding roads/outside the QN), particularly in relation to air quality.	Air quality has been assessed as part of the monitoring of the trial. Local air quality monitoring includes two diffusion tubes; one situated on Aldermans Hill at Devonshire Road and one on Winchmore Hill Road near Southgate Circus. An air quality assessment was carried out by an external agency and is attached at Appendix 5. Overall, whilst the scheme leads to changes in pollutant concentrations, the scale of the change in relation to total predicted concentrations are sufficiently small to lead to no significant effect, neither beneficial nor adverse.  Further detail can be seen by referring to 'Air quality' section in Table 1 of the main report.
4.6	The QN has disadvantaged homeowners on surrounding roads in relation to their property prices, compared to homeowners within the QN	The Council does not have data to support this. The role of the Council is to consider approaches to enabling greater levels of sustainable travel, to consider how the network operates and to manage the public highway accordingly.
4.7	The QN benefits residents who live within the area only, a relatively small number of residents	This Quieter Neighbourhood is not a project delivered in isolation and the Council will look to explore Quieter Neighbourhood projects in other areas too, as part of a borough wide plan to

		enable an increase in active travel and reduce the reliance on private motor vehicles, particularly for short trips.
4.8	It's a human right to have freedom of movement	All properties, including businesses within the QN remain accessible by private motor vehicle, whilst the route taken to access a property or business may be different, dependent on transport type, than it was before the trial was implemented.
4.9	The project has created a social or community divide, or a class divide	There is no evidence at this time of the scheme creating a social or class divide. Previous transport <sup>3</sup> and sociological <sup>4</sup> research has shown that high levels of motor traffic on residential streets are associated with poor health and weakened social cohesion among residents.
4.10	The scheme is unfair on residents / residents are being punished for the activities of motorists cutting through the area	The Council have set out the impacts of the project and considers that the benefits outweigh any disbenefits / disadvantages.

## 5 Process and decision making of the project

Ref	Objection based on the grounds that:	LBE response
5.1	Traffic in the area wasn't a problem prior to the QN and therefore it did not need to be implemented	Enfield Council has received concerns from residents and Ward Councillors in the Fox Lane area for many years about the impact of motor traffic passing through the area. In response, conversations started back in 2014 as part of the Cycle Enfield programme. Base line data was published on the project page prior to the implementation of the trial.
5.2	The QN is a revenue-generating scheme	The use of ANPR cameras in this project have been at the request of the emergency services to enable their continued access to the area. Enforcement revenue is only generated where motorists fail to comply with the traffic signs that are in place. Accounts from

<sup>3</sup> Hart, J., & Parkhurst, G. (2011). Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol UK. World Transport Policy and Practice, 17(2), 12-30

<sup>4</sup> APPLEYARD, D., 1981. Livable Streets. Berkeley: University of California Press.



		enforcement activity must be kept and any surplus can only be used for prescribed purposes, including supporting public transport and other highway and transport improvements. In previous years surpluses have been used to pay towards the contribution the Council has to make to pay for concessionary travel for qualifying residents.
5.3	There is a lack of evidence being used to support decisions	The project published a project rationale document to help explain the rationale for the project, this included a set of project objectives which were also reinforced in the project monitoring plan. These objectives and how the trial has met them has been discussed in the main body of the report.
5.4	There has been a misuse of funds / the project is a waste of money / the revenue generated from the QN was going towards increased salaries for Council members	Transport funding has been provided from Transport for London which is specifically intended for these projects. Accounts from enforcement activity must be kept and any surplus can only be used for prescribed purposes, including supporting public transport and other highway and transport improvements. In previous years surpluses have been used to pay towards the contribution the Council has to make to pay for concessionary travel for qualifying residents.
5.5	The Council has not met legal requirements	The Council has met its legal responsibilities and this is set out in the main report.
5.6	The Council has exploited the pandemic as a reason to implement the QN	<p>As discussed in the main report, Enfield Council has received concerns from residents and Ward Councillors in the Fox Lane area for many years about the impact of motor traffic passing through the area. In response, conversations started back in 2014 as part of the Cycle Enfield programme.</p> <p>The project aims align with the policy context of local, regional and national policies and strategies that seek to respond to the climate emergency and increase levels of physical activity, and post-pandemic to enable a green recovery.</p>

5.7	<p>Traffic will become worse after COVID-19 lockdowns / conducting the QN trial during a period of multiple COVID-19 lockdowns does not give a representative reflection of the effect that the QN will have on traffic flow in the future</p>	<p>Traffic volumes have been monitored on boundary and several surrounding roads, and the analysis included in the report is based on post implementation surveys collected in September 2021, after restrictions due to Covid-19 had been eased.</p> <p>The reported changes in the network should not be considered as only influenced by the Fox Lane QN. This project has been implemented during the pandemic which has created changes in travel patterns. It is not known what longer-term impacts the pandemic will have. The analysis in Appendix 1 includes a 'sensitivity test' which provides an estimate of the potential impact of the scheme if the pandemic had not happened. The report commits to some further monitoring.</p>
5.8	<p>Levels of air pollution will be reduced by a transition to electric vehicles and / or ULEZ and that, therefore, there is no need to reduce the number of vehicles on the roads</p>	<p>Transition to electric vehicles, and / or ULEZ, is expected to reduce emissions. It is however not expected that on its own would result in meeting the objectives of the QN.</p> <p>Electric vehicles are an important part of Enfield's plan to be a carbon neutral borough by 2040, and efforts are being made in accordance with the Enfield Climate Action Plan 2020 to increase electric vehicle charging provision. They however are not a solution on their own.</p> <p>As much as 50% of particle pollution comes from brake wear, tyre wear and road surface wear<sup>5</sup>. These particles contribute to what is known as 'non-exhaust emissions' particulate matter. Non-exhaust emissions increase with vehicle mass and electric vehicles tend to be heavier than their petrol/diesel counterparts due to the battery mass. An effective way to reduce these emissions is to reduce traffic volumes.</p>

<sup>5</sup> [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1907101151\\_20190709\\_Non\\_Exhaust\\_Emissions\\_typeset\\_Final.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1907101151_20190709_Non_Exhaust_Emissions_typeset_Final.pdf)

		Further, other problems associated with motor vehicle use, for example collisions, congestion, physical inactivity and parking availability, will not be solved by a transition to electric vehicles.
5.9	LBE did not monitor pollution levels within over 30 residential roads impacted by drivers seeking alternative routes	<p>Air quality has been assessed as part of the monitoring of the trial. Local air quality monitoring includes two diffusion tubes; one situated on Aldermans Hill at Devonshire Road and one on Winchmore Hill Road near Southgate Circus. An air quality assessment was carried out by an external agency and is attached at Appendix 5. Overall, whilst the scheme leads to changes in pollutant concentrations, the scale of the change in relation to total predicted concentrations are sufficiently small to lead to no significant effect, neither beneficial nor adverse.</p> <p>Further detail can be seen by referring to 'Air quality' section in Table 1 of the main report.</p>
5.10	QNs look unattractive / deter from the local area and environment	The Council does not consider that QNs look unattractive / deter from the local area and environment. Modal filters, in particular those with a bollard, provide an opportunity for improved public realm.
5.11	The disbenefits of the QN outweigh the benefits / there is a lack of benefits of the project	The Council have considered the impacts of the project and are of the view that the benefits the scheme brings outweighs any dis-benefits, the rationale for this is set out in the project report.
5.12	The QN is undemocratic / there has been a misuse of power by decision makers	The decision to make the trial permanent or not lies with elected members. Consultation has been undertaken to seek feedback on the trial. Outcomes of the consultation and Council's responses are presented in the report.
5.13	There was lack of clarity around how the success of the QN will be measured	The project published a project rationale document to help explain the rationale for the project, this included a set of project objectives which were also reinforced in the project monitoring plan. These objectives and how the trial has met them has been discussed in the main body of the report.

5.14	The QN objectives are irrelevant / unachievable due to the impossibility to prove the scheme's success	The main report sets out several areas of measured data to inform the extent of success of the trial. The provision of the data, acknowledging that the pandemic has created some limitations, is considered sufficient to inform a decision. The data is presented alongside other aspects of the report, such as the policy direction and context around climate and public health.
5.15	There was a lack of project objectives	The project published a project rationale document to help explain the rationale for the project, this included a set of project objectives which were also reinforced in the project monitoring plan. These objectives and how the trial has met them has been discussed in the main body of the report.
5.16	No mid-point review or independent review of the project was carried out	Consultation feedback was reviewed consistently during the trial period. It was considered appropriate to collect traffic data when travel restrictions due to Covid-19 had been removed and following the Summer holidays, and after a time such that residents were able to adjust to the changes. It is anticipated that behaviour change may take some time. External analysis has been sought in a number of monitoring areas, such as traffic, air quality and noise.
5.17	The community was not able to review the data collected throughout the trial and has been provided with limited time to review the report ahead of the decision being made	The long period of consultation has enabled the community to provide their input based on their lived experiences. The role of Officers is to produce a report which sets out the findings from the consultation and the monitoring to inform recommendations on the project. This report is then published ahead of the decision maker making a decision on the project, in line with the normal process of governance.
5.18	There has been a lack of data collected to monitor the project / lack of accuracy of data / poor or lack of methodology of data collection / data collected could be used to prove anything in connection to the QN trial	The main report sets out several areas of measured data to inform the extent of success of the trial. The provision of the data, acknowledging that the pandemic has created some limitations, is considered sufficient to inform a decision. The data is presented alongside other aspects of the report, such as the policy direction and context around climate and public health. External consultants

		have been used to present several areas of data and their methodology explained within the respective reports.
5.19	Traffic data collected during the fuel crisis was considered as part of the monitoring of the scheme and is misleading / invalid	Post-implementation surveys were carried out in September 2021. Data collected in the days following the 24 <sup>th</sup> September have not been used due to the fuel crisis that took place in this month as that may have impacted further travel patterns. The analysis is presented in Appendix 1 of the report.
5.20	It is unlikely the QN will encourage more people to walk and cycle as people rely on their cars	The Council take the view that creating an environment where there is lower volumes of motor traffic and slower speeds will enable an environment where more people feel they are able to make a choice to walk or cycle more of their journeys, particularly shorter trips.
5.21	There was an improper alteration of a legal document / misleading information / an inaccurate statement of reasons	<p>The trial was introduced using a number of Experimental Traffic Orders (ETOs), which are valid for a maximum of 18 months. The Orders came into operation on 7 September 2020 and expire on 7 March 2022. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 make provision for orders to be made giving permanent effect to the experimental orders, subject to a number of requirements being met, including:</p> <ul style="list-style-type: none"> <li>• The notice of making containing the required statements;</li> <li>• The deposited documents being available for inspection (allowing for the temporary arrangements made during the coronavirus pandemic);</li> <li>• The deposited documents including a statement of the reason for making the experimental order;</li> <li>• No variation or modification of the experimental orders was made more than 12 months after the order was made.</li> </ul>
5.22	Key decision makers are biased due to	In bringing forward Quieter Neighbourhoods, the Council have been influenced by local, London and national policy which all align to promote the delivery of active travel projects. There are

	<ul style="list-style-type: none"> <li>• Their membership / involvement with local community groups including Better Streets for Enfield</li> <li>• Living in the area</li> </ul>	<p>numerous community groups across Enfield, many of which have online forums such as facebook groups. It is not unusual for Officers to be 'members' of such social media platforms groups as one approach to gaining insights into local community views.</p>
5.23	<p>There was a change of key decision maker from Cllr Barnes to Cllr Caliskan at a late stage in the project when he had led the project throughout</p>	<p>The Deputy Leader remains the portfolio lead for this project and as such is involved, however the final decision has been made by the Leader of the Council.</p>
5.24	<p>The reasoning for the project of "80% of journeys are less than 2 km" has no evidence base</p>	<p>The project published a project rationale document to help explain the rationale for the project, this included a set of project objectives which were also reinforced in the project monitoring plan.</p> <p>The main report includes the following:  "The 2018 Mayor's Transport Strategy (MTS) set the overall direction and objectives for transport in London. The MTS, and the supporting evidence for the MTS, includes the following statements:</p> <ul style="list-style-type: none"> <li>□ <i>74% of car trips could be made by a more sustainable mode, for example cycling, walking or public transport"</i></li> </ul>
5.25	<p>There is a lack of suitability of the area for a Low Traffic Neighbourhood according to the Strategic Neighbourhoods Analysis issued by TFL and due to roads around the area not being wide enough to handle traffic volumes</p>	<p>This area is considered suitable for these types of interventions.</p> <p>Government guidance<sup>6</sup> on roads classification states:</p> <ul style="list-style-type: none"> <li>• "The system of roads classification is intended to direct motorists towards the most suitable routes for reaching their destination. It does this by identifying roads that are best suited for traffic.</li> <li>• All UK roads (excluding motorways) fall into the following 4 categories:</li> </ul>

<sup>6</sup> <https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-primary-route-network/guidance-on-road-classification-and-the-primary-route-network>

		<ul style="list-style-type: none"> <li>• <i>A roads – major roads intended to provide large-scale transport links within or between areas</i></li> <li>• <i>B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network</i></li> <li>• <i>classified unnumbered – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to ‘minor roads’ on an Ordnance Survey map and sometimes known unofficially as C roads</i></li> <li>• <i>unclassified – local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category”</i></li> </ul> <p>With reference to the above, the key routes in the vicinity of the Fox Lane QN are:</p> <ul style="list-style-type: none"> <li>• A1004 High Street / The Green / Cannon Hill / Aldermans Hill</li> <li>• A105 Green Lanes</li> <li>• A111 The Bourne, Bourne Hill</li> </ul> <p>The main roads are therefore most suited to carrying higher volumes of traffic.</p>
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## 6 Communications and engagement

Ref	Objection based on the grounds that:	LBE response
6.1	<p>There was a lack of or poor communication and consultation with the community. Specific points included:</p> <ul style="list-style-type: none"> <li>- Lack of or no communication with residents about the scheme, what it</li> </ul>	<p>Communications and engagement opportunities with the community regarding the project included:</p> <ul style="list-style-type: none"> <li>• Update of Let’s Talk project page in October 2020, hosting which hosts information on the project, FAQs, documents,</li> </ul>

	<p>entails and how to access their property</p> <ul style="list-style-type: none"> <li>- Lack of consultation with wider community who is also affected</li> <li>- No public meeting held</li> </ul>	<p>the electronic consultation survey, and project updates posted to the page</p> <ul style="list-style-type: none"> <li>• A project flyer detailing the project background, a plan of the project, and information on the consultation delivered in July 2020</li> <li>• A notification letter with details of the construction delivered in August 2020</li> <li>• A letter inviting residents to participate in the consultation and providing details of how to do so, delivered in October 2020</li> <li>• The Deputy Leader and Healthy Streets Programme Director met with representatives of Fox Lane &amp; District Residents Association on 21<sup>st</sup> January 2021 as part of the ongoing engagement and consultation process, to provide an opportunity to listen to different perspectives on the project</li> <li>• A letter to Blue Badge Holders in the Fox Lane area inviting their participation in the disabled people and carers survey for the project, delivered in February 2021</li> <li>• Emails to survey participants who stated they were a carer or disabled person as well as Blue Badge Holders in the Fox Lane area, inviting their participation in the disabled people and carers survey for the project, sent February 2021</li> <li>• A letter inviting residents to join an online public webinar and the closing date of the online survey, delivered in May 2021</li> <li>• An online webinar with a Q&amp;A session hosted on 26 May 2021</li> <li>• A letter with information on the continued opportunity to comment on the traffic orders remaining open until 11 January 2022, delivered in November 2021.</li> </ul>
6.2	There was a lack of transparency of information on the project	Significant information was hosted on the project page on the Let's Talk Enfield site. The link for this was provided in all



		communications. The report and associated data collected during the trial has been published online.
6.3	Residents felt they were being ignored or not listened to by the Council	The statutory consultation was the formal process by which residents could provide their comments on the trial. Further, the Council received and responded to a high volume of correspondence throughout the trial period.
6.4	There were issues with the online survey whereby residents could not access it	There were no significant issues with the operation of the online survey. Any individual issues that were raised were promptly dealt with and comments were collected by email and letter for those who did not have the means or want to complete the online survey. The level of responses illustrate that the feedback process was working.
6.5	There is a lack of technology ability / access to technology amongst some residents which excluded some from being consulted	Non-electronic means of participating in the consultation were available including paper copies of the survey or submitting comments by email or letter. Letters delivered to the area provided details of these means.
6.6	There was insufficient consultation / consideration of disabled people	In addition to the communications detailed above, further engagement with disabled people and carers took place in March 2021 following an early review of consultation responses provided by this group. The Disabled People and Carers Engagement Report, along with the consultation findings report outline the views of people with disabilities.
6.7	Letters about the QN were hard to read for non-English speakers	This feedback was responded to early on during the consultation. Subsequently, text in Greek, Polish and Turkish was added to all letters. The project page can also be translated into languages other than English.
6.8	Schools have not been consulted	Schools in the area were called and sent information on how to share their views, and encouraged them to share this information with staff and parents.
6.9	The use of the term "rat-runner" is offensive / incorrect	Whilst the term "rat-runner" is a commonly used term for drivers who use shortcuts or cut-through routes, it is not one typically used by Council Officers, who refer to 'through traffic'.

6.10	Emergency services were not consulted	Emergency services were consulted prior to the implementation of the trial, and the project team remained in regular communication throughout the trial period.
6.11	The scheme is only supported by a vocal minority	The consultation findings report includes information on who took part in the consultation for the responses where we had demographic information. Based on responses received we do not believe that the scheme is only supported by a vocal minority. To take part in the online survey a user account was required. This allowed for tracking of unique responses. In regards to emails, unique email addresses were identified. This information can be found in the consultation findings report which sets out the feedback received. Anyone was able to respond to the consultation.
6.12	Local businesses were not consulted	The consultation period has allowed businesses to provide their responses to the scheme. Further, visits to businesses were conducted in August and September 2021. More detail is provided in the Community Engagement section within the main report.
6.13	The Council implemented the scheme when previous engagement with the community demonstrated a lack of support	A previous trial was delivered in the Fox Lane area in late 2018 / early 2019. Following the removal of this trial, a revised plan was proposed to the community in November 2020 and was open for comment by residents online and at an in-person event held on 12 November 2019. Feedback received through this process informed a different design that was implemented as a trial in September 2020 (the subject of this report). The current trial was implemented through the use of Experimental Traffic Orders and as such was subject to consultation during the trial period.
6.14	Lamppost posters were ineffective in communicating the scheme	There were a range of methods of communication other than lamppost posters as detailed above.

## 7 Design and Infrastructure

Ref	Objection based on the grounds that:	LBE response
7.1	Public transport or active travel are not suitable alternatives:	The QN encourages mode shift by making active travel more attractive within the QN area. It is acknowledged not all trips are

	<ul style="list-style-type: none"> <li>• in general</li> <li>• due to disability</li> <li>• due to age</li> <li>• for children as they cannot cycle longer distances and/or over tougher terrain</li> <li>• for families</li> <li>• due to COVID-19 risk</li> <li>• due to family commitments</li> <li>• due to work commitments</li> <li>• due to longer journey times</li> <li>• due to safety</li> <li>• due to lack of public transport options</li> </ul>	<p>able to be made by modes other than private car. The Mayor's Transport Strategy 2018 estimates that 74% of car trips could be made by a more sustainable mode. It is Enfield's portion of these trips being targeted by the QN project.</p>
7.2	The signage regarding the QN is not clear enough / misleading	The signage at the camera enforced modal filters is fully compliant with relevant guidelines.
7.3	<p>Objection that there are not enough amenities to sustain a QN, such as local:</p> <ul style="list-style-type: none"> <li>- schools</li> <li>- services (health, social, community)</li> <li>- green spaces</li> <li>- public transport</li> <li>- recreation facilities</li> </ul>	<p>There are a number of amenities within walking and/or cycling distance, for example Palmers Green Town Centre and Grovelands and Broomfield Park.</p> <p>It is not only amenities that generate a journey to be made. In addition to shops and other amenities located in places such as a high street, journeys can be made for a number of reasons on foot or cycle within walking / cycling distance, by those who are able to. Some examples are:</p> <ul style="list-style-type: none"> <li>• To access other modes of transport, for example a bus stop or train / tube station</li> <li>• To visit friends or family</li> <li>• To access educational facilities, healthcare, recreational facilities, or the journey itself may be for recreation.</li> </ul> <p>In addition, the longer-term intention is to connect one QN project to another, creating a 'bridge' where necessary across dividing strategic roads. This approach will enable people to reach amenities in nearby communities.</p>

7.4	There is inadequate street lighting in the QN which impacts crime and safety	The lighting levels have been set in accordance with national design standards and have been checked during the trial. The Council will continue to check any further queries that are raised about views of insufficient lighting at specific locations.
7.5	<p>Pedestrian infrastructure in the area is of low quality / in poor condition and does not support the aims of the QN. Specific points included:</p> <ul style="list-style-type: none"> <li>• Overgrown plants and hedges along paths</li> <li>• Old and cracked pavements with trip hazards</li> <li>• Poor quality of facilities for people using wheelchairs, buggies, walking sticks or other mobility devices</li> </ul>	As across all other areas of the Borough, these issues can be reported to enable an inspection and where necessary remedial works, within the constraints of the available funding.
7.6	Cycling infrastructure in the area is of low quality / in poor condition and does not support the aims of the QN	Complementary cycle infrastructure, such as the cycle lanes along the A105 Green Lanes and cycle parking, support cycling in the area. The cycle lanes along the A105 Green Lanes are of good quality. Additional infrastructure can be developed as part of the ongoing Healthy Streets programme to continue to build a connected network, projects such as this play a role in this network development.
7.7	Some individuals reported bollards being vandalised/stolen	Bollards have been fixed when vandalised. During the trial, where removeable bollards were used, following repeated vandalism, those bollards have been upgraded to a more advanced locking mechanism that the LFB have approved.
7.8	Road layout issues associated with the QN	We do not consider that there are any fundamental road layout issues associated with the QN.
7.9	The design is ineffective as cars are driving through the modal filters	The signage at the camera enforced modal filters is fully compliant with relevant guidelines.

		Whilst some drivers continue to travel through the modal filters, the traffic monitoring data indicates significant reductions in average traffic volumes on the local roads within the QN area.
7.10	There is a blind spot in the junction of Bourne Hill and Green Lanes	It is not clear what this feedback refers to, although no changes to the infrastructure have been made at this junction as part of this project.
7.11	Low Traffic Neighbourhoods are flawed in their nature and do not achieve their desired objectives / have been unsuccessful elsewhere	The project published a project rationale document to help explain the rationale for the project, this included a set of project objectives which were also reinforced in the project monitoring plan. These objectives and how the trial has met them has been discussed in the main body of the report. A number of LTNs across London and beyond have been considered successful and made permanent.
7.12	No contingency plan was in place in case the trial did not achieve objectives particularly in relation to air pollution	If the trial was considered to not meet the objectives it would be removed and alternative approaches considered.
7.13	The QN was poorly designed and planned, specific comments included: <ul style="list-style-type: none"> <li>• Impacts on residents and businesses not considered</li> <li>• Impact on parking was not considered, British Parking Association Guidance was not followed</li> </ul>	A team of traffic engineers designed the scheme in collaboration with Council officers. Following design work after a trial in 2019 was removed, the community were invited to provide feedback on revised plans for a Quieter Neighbourhood in late 2019 which adopted more robust measures, including modal filters (bollards) on many of the roads within the area. In response to feedback received, the designs were further revised, with a key change to create an increase in the number of access/exit points into the area. Conversations were also held with the emergency services who requested the use of some camera-controlled filters to enable continued access for emergency services vehicles. The trial implemented in September 2020 reflected the revised designs. The approach of using a trial to introduce the Quieter Neighbourhood allowed the Council to understand the effectiveness of the measures whilst they were in place, and gather live feedback from the community and stakeholders. The

		current design is considered effective in achieving the objectives and balancing community feedback previously received.
7.14	The QN has introduced surveillance of residents through the use of cameras which invades privacy	The use of CCTV cameras for enforcing restrictions meet privacy requirements.

## 8 Miscellaneous

<b>Ref</b>	<b>Objection based on the grounds that:</b>	<b>LBE response</b>
8.1	Behavior change is complex and expensive and will not be achieved by the QN	The project published a project rationale document to help explain the rationale for the project, this included a set of project objectives which were also reinforced in the project monitoring plan. These objectives and how the trial has met them has been discussed in the main body of the report. The Healthy Streets programme consists of a wide range of interventions which need to be considered collectively in order to generate longer-term change, Quieter Neighbourhoods are considered to form part of this overall approach.
8.2	The QN has impacted house sales/values or made people move from the area	The Council does not have data to support this. The role of the Council is to consider approaches to enabling greater levels of sustainable travel, to consider how the network operates and to manage the public highway accordingly.
8.3	That there had been an increase in fly tipping since the QN was implemented	The Council has a report function for fly tipping and will respond accordingly.
8.4	Overgrown hedges contribute to a feeling of lack of safety	The Council has a maintenance programme in place across the borough. Areas of concern can be reported via the Council website.