

## **Annex 4**

### **A1010S to North Middlesex Hospital Cycle Route – Responses to Objections**

#### Objections raised

Objections have been taken from all communications throughout the consultation period between 23 November 2020 and 23 May 2021. Whilst not forming part of the statutory consultation and therefore not strictly considered to be objections, the additional feedback received through the engagement survey that took place between 17 May 2021 and 6 June 2021 has also been responded to within this document.

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 provide an indirect response to many of the themes raised. Objections raised and feedback received broadly fell into the groupings below. Some may fall across more than one category but have only been listed once.

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

They are listed in each category in no specific order.

**1 Motor traffic, traffic related impacts, mobility and access**

<b>Ref</b>	<b>Nature of objection</b>	<b>LBE response</b>
1.1	Objection that the scheme is reassigning traffic to nearby roads and causing congestion	The traffic survey data that has been collected shows that traffic volumes have dropped by an average of 35% (22% if Park Road is excluded) across the project area. Furthermore, all 5 roads that were surveyed demonstrated an individual reduction in traffic between 10% and 89%.
1.2	Objection that the scheme is causing longer journeys due to the need for detours	<p>The Council accept that some individual journeys that continue to be taken by private car may have become slightly longer than the same journeys prior to the implementation of the project. However, as the traffic volumes in the area have dropped since the implementation of the project, any potential increase in journey times is likely to be small.</p> <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>
1.3	Objection that the scheme reduces accessibility for health care professionals / carers / to health care facilities, impacting on older and/or disabled people	<p>The scheme has only affected motor vehicle journeys that were previously passing through the section of Park Road under the railway bridge. There is a number of alternative routes that can be taken by motor vehicles through the area, which may be different depending on the origin and the destination of the journeys, and include roads better suited for motor traffic.</p> <p>The scheme increased accessibility by enabling trips to be made with additional modes of travel.</p>
1.4	Objection that the scheme is reassigning traffic to unsuitable roads (e.g., residential / narrow roads)	The traffic survey data that has been collected shows that traffic volumes have dropped by an average of 35% (22% if Park Road is excluded) across the project area.

		<p>The roads where any potential motor traffic reassignment could occur are of the same or higher class. Therefore, they are equally or better suited to carrying motor traffic.</p> <p>The Government's guidance on road classification can be found at <a href="https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-primary-route-network/guidance-on-road-classification-and-the-primary-route-network">https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-primary-route-network/guidance-on-road-classification-and-the-primary-route-network</a>.</p>
1.5	Objection that the scheme reduces air quality / causes excess pollution	<p>Nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) are generally considered to be the main pollutants of concern and road transport contributes to a significant proportion of these pollutants. The volume and movement of traffic can directly impact air quality. Traffic volume in the area has decreased by an average 35% and no substantial changes in the movement of motor vehicles have taken place since the introduction of the proposed interventions. Therefore, no broad negative impacts on air quality can be anticipated.</p> <p>Small improvements in air quality could occur with an overall increase in cycling mode share and have the potential to increase if a greater mode shift from private motor vehicles to cycling is achieved in the future.</p>
1.6	Objection that the scheme reduces accessibility for emergency vehicles	<p>Engagement took place with the London Fire Brigade, the Metropolitan Police Service, and the London Ambulance Service throughout the development of the proposals for this project to ensure that the project would not impede their ability to carry out their services and responsibilities. None of the emergency services objected to the experimental traffic orders. Engagement and discussion with the emergency services continued post implementation of this project to ensure that there were no significant impacts on their travel time. None of the emergency services have raised any incidents of delayed responses due to the project.</p>
1.7	Objection that the scheme reduces accessibility for residents	<p>The scheme has only affected motor vehicle journeys that were previously passing through the section of Park Road under the railway</p>

		bridge. There is a number of alternative routes that can be taken by motor vehicles through the area, which may be different depending on the origin and the destination of the journeys, and include roads better suited for motor traffic. Residents using private motor vehicles continue to be able to access all properties. The scheme increased accessibility for residents to properties in the area by enabling trips to be made with additional modes of travel.
1.8	Objection based on the view that residents should continue to have access	<p>One of the aims of the project is to enable a longer-term increase in the levels of walking and cycling within and through the scheme area. Allowing residents exemptions from the Park Road modal filter, via ANPR or other means, could restrict the level of changes in travel behaviour by those residents who drive and live within the project area.</p> <p>Furthermore, the additional motor traffic within the area from trips made by residents would 'dilute' the benefits to others and potentially limit the potential for growth in walking and cycling.</p>
1.9	Objection about negative impact on local businesses	<p>All businesses within the area remain accessible by private motor vehicles, whilst the route taken to access a business may be different.</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>
1.10	Objection that the scheme reduces accessibility for visitors, tradespeople, and refuse collection	<p>The project does not impact journeys by public transport and enables more journeys to take place by active travel modes.</p> <p>For those who will need to access the area by motor vehicle, all properties, including businesses, remain accessible, whilst the route taken to access a property or business may be different.</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>

1.11	Objection that the scheme is causing increased congestion in some areas, while other areas benefit from reduced traffic	The traffic survey data that has been collected shows that traffic volumes have dropped by an average of 35% (22% if Park Road is excluded) across the project area and its surrounding roads.
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<b>2 Physical and mental health and / or safety</b>		
<b>Ref</b>	<b>Nature of objection</b>	<b>LBE response</b>
2.1	Objection based on the scheme impacting local residents' mental health, including feeling stress, frustration, or anxiety	<p>Whilst it is acknowledged that some people may feel this way, the project aims to encourage a shift in modes of travel and therefore reduce the dominance of motor traffic in the area.</p> <p>In addition, the project aims to promote an increase of physical activity, through encouraging walking and/or cycling as a normal, everyday transport mode, thus positively affecting mental health.</p>
2.2	Objection that the scheme reduces safety	Both the designs and the implemented measures have been through a safety assessment process. The collision history does not indicate significant safety concerns.
2.3	Objection that the scheme is causing an increase in road rage	Road users are responsible for their own behaviours and naturally should be driving responsibly and in accordance with the Highway Code.

<b>3 Equalities</b>		
<b>Ref</b>	<b>Nature of objection</b>	<b>LBE response</b>
3.1	Objection based on the view that the scheme disadvantages disabled people	The decision report contains the equality impact assessment where the impact on disability is considered.
3.2	Objection based on the view that the scheme disadvantages older / younger people	The decision report contains the equality impact assessment where the impact on age is considered.

#### 4 Process and decision making of the project

Ref	Nature of objection	LBE response
4.1	Objection based on the view that the number of cyclists in the area is not sufficient to justify the changes in the scheme	<p>Prior to the implementation of the project and based on data collected in 2017, an average of 48 people cycled every day on Park Road, where the A1010S to North Middlesex Hospital Cycle Route starts. Following the implementation of the trial, the cycle counts that were carried out revealed that 94 people cycled on Park Road per day, exhibiting a 96% increase in volume.</p> <p>The above figures were collected through the ATC surveys, which are better suited to accurately counting motor vehicles and therefore cannot capture 100% of the cycling movements. In fact, a classified link cycle count that was carried out on 27th May 2021 using a camera, revealed that the ATC survey on the same day captured 76% less cycle journeys than the actual number. Therefore, the actual amount of people who cycled in the area before the project was implemented and the increase following implementation are likely to be higher.</p> <p>The delivery of projects such as the A1010S to North Middlesex Hospital Cycle Route cannot be based on the number of cyclists already using a particular route alone. For instance, Park Road was carrying an average of 9,223 motor vehicles per day before the project was implemented. Such high volumes of motor traffic create an unsafe and unwelcoming environment for people to cycle, particularly for those who are less confident.</p> <p>The scheme was delivered in the context of local, regional and national policies and strategies that seek to respond to the climate emergency, reduce traffic congestion and increase levels of physical activity, and post-pandemic response to enable a green recovery. Improving on the current ratio of cars to pedestrians and cyclists, i.e., 'mode share' is key to these policies. An example of this is the Mayor's Transport Strategy which aims</p>

		<p>for 80% of all trips to be made on foot, by bicycle or by public transport by 2041.</p> <p>Indeed, one of the objectives of this project is to contribute towards a long-term increase in the levels of active travel, both along the route and as part of a wider borough network. The increase in cycling that the monitoring data demonstrated, indicate a trend towards the right direction.</p> <p>The provision of safe infrastructure enables more people to make the choice to cycle some of their local journeys. Evidence from other schemes indicates that the number of cycling journeys in the Borough are increasing where good quality infrastructure has been installed. For instance, when assessing the cycling data captured on Cycleway 20 at Palmers Green for the month of April (in order to account for seasonal variation in cycle journeys due to weather) between 2019 and 2021, it can be seen that the number of cycle trips increased by approximately 36%.</p>
4.2	Objection based on the view that the scheme is a money-making tool for the Council	<p>The use of CCTV camera in this project has 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 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.</p>
4.3	Objection that the scheme is unnecessary based on the perception that there are no congestion or safety issues in the area	<p>The project objectives are not solely focussed on traffic or safety issues in the area. Improving provision for modes of active travel strongly aligns with national, regional and local guidance as set out in the main body of the report.</p>
4.4	Objection about the cumulative impact of other schemes (e.g., combination with Streetspace schemes, road closures)	<p>TfL released funding under the Streetspace for London programme for authorities to create an environment that is safe for both walking and cycling. This was to enable people to get around whilst maintaining social distance and helping to avoid overcrowding on public transport. It was also</p>

		<p>an opportunity to embed walking and cycling as part of new long-term commuting habits and reap the associated health, air quality and congestion benefits.</p> <p>The criteria and pace of delivery, set out by the TfL Streetspace for London programme, led to a number of schemes introduced within a short period of time to deliver transport network improvements and support recovery from the COVID-19 emergency.</p> <p>The process required by TfL for changes to the highway which may affect the road network was followed. This process evaluates the impact of such proposals on the road network, bus services, and signalised crossings and junctions, with the prime focus on safety, to avoid any unintended operational impacts, including taking account of other highway authority or traffic authority proposals.</p> <p>After assessing the plans and evaluating the likely impacts, TfL raised no objections and concluded that the proposed scheme would not have an unduly adverse impact on the network.</p>
4.5	Concern about time of implementation during the pandemic (e.g. due to inaccurate data, low traffic levels, added stress)	<p>Several sets of traffic data were used as part of the development of the proposals, including pre-pandemic data. Post-implementation surveys were undertaken in May 2021, when the Step 3 of the Government's Covid-19 response roadmap came into force. This further relaxed the restrictions and allowed all but the most high-risk sectors to reopen. Some monitoring activity in the area will continue to be able to identify any significant changes.</p> <p>It is acknowledged that this trial has been in operation during the pandemic and the increased stress that it may have created.</p>
4.6	Objection that the scheme is illegal	<p>The Council adhered to the process and all that is required when implementing a project using Experimental Traffic Orders, including the conduct of the statutory consultation. In addition to the Council's statutory obligations, the Council provided additional communications as outlined in the main report, including a further opportunity to share feedback in May 2021 through an online engagement survey, and responded to many</p>

		<p>enquiries about the project. The approach of an ETO is that consultation follows implementation, in order for feedback to be received in light of experience of the trial.</p> <p>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.</p>
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## 5 Communications and engagement

Ref	Nature of objection	LBE response
5.1	Objections based on lack of consultation and/or undemocratic method	<p>Communications and engagement activities with the wider community regarding the project included:</p> <ul style="list-style-type: none"><li>• A letter delivered in October 2020 to residents, businesses, and other organisations within the local area describing the project background, introducing the plans, explaining the ETO process, mentioning the next steps, and informing them of the project page</li><li>• Launch of Let's Talk project page in October 2020, hosting information on the project, frequently asked questions (FAQs), key dates for the project, documents, information on the consultation, the electronic consultation survey, notices of the traffic orders, and project updates posted to the page</li><li>• Four notification letters, one for each of Park Road, Sweet Briar Walk, Dorrit Mews, and Tanners End Lane, delivered in November and December 2020 to residents, businesses, and other organisations with details of the construction.</li><li>• A letter delivered in December 2020 to residents, businesses, and other organisations within the local area notifying them of camera enforcement of the road closure to through motor traffic (except emergency services) on Park Road N18, under the railway bridge, becoming effective from Monday 21<sup>st</sup> December 2020.</li><li>• A letter inviting residents, businesses, and other organisations to participate in the consultation and providing details of how to do so, delivered in March 2021.</li><li>• A letter inviting residents, businesses, and other organisations to participate in an online engagement survey and providing details of how to do so, delivered in May 2021.</li></ul>

		<p>Notice of the draft permanent traffic orders was published in the London Gazette and Enfield Independent newspapers on 11<sup>th</sup> November 2020. Any person could make objections or representations relating to the making of the permanent orders, within a period of six months beginning with the date on which the experimental orders came into operation. The six-month statutory period for objections or representations ended on 23<sup>rd</sup> May 2021.</p> <p>The Council adhered to the process and all that is required when implementing a project using Experimental Traffic Orders, including the conduct of the statutory consultation. In addition to the Council's statutory obligations, the Council provided additional communications as outlined above, including a further opportunity to share feedback in May 2021 through an online engagement survey, and responded to many enquiries about the project.</p>
5.2	Objection about lack of and/or poor quality of information provided with regards to past and/or existing data collection	<p>A project Monitoring Plan document was made publicly available on the Let's Talk Enfield project page. This document sets out both the data already collected and the monitoring and evaluation that would be undertaken in response to the implementation of the A1010S to North Middlesex Hospital Cycle Route project. The link for the Let's Talk Enfield site was provided in all communications.</p> <p>The traffic analysis, which includes data collected during the trial, has been published online alongside the main report.</p>
5.3	Objection about phrasing of question / question unclear / leading questions	<p>The statutory consultation, which was the formal process by which residents could provide their views on the trial, adhered to the conduct requirements. Moreover, the Council provided a further opportunity to share feedback through an online engagement survey, which included a series of open questions where respondents could express their views freely.</p>

<b>6 Design and infrastructure</b>		
<b>Ref</b>	<b>Nature of objection</b>	<b>LBE response</b>
6.1	Objection that the signage is unclear	<p>The signage, including that at the camera-enforced modal filter at Park Road, is fully compliant with relevant guidelines.</p> <p>Road users have an obligation to know and apply the rules contained in the Highway Code, which includes, among others, the signs that were used for the camera-enforced modal filter.</p>
6.2	Objection that the scheme / changes are confusing	<p>The design of the measures that were introduced was based on the latest relevant guidelines available at the time. The new street furniture installed was kept to a minimum to avoid unnecessary clutter and prevent confusion, whilst simultaneously achieving design and safety requirements.</p>
6.3	Objection based on the view that the scheme is poorly thought out / not responding to the area's problems	<p>A team of professional engineers designed the scheme in collaboration with Council officers, based on the latest relevant guidelines available at the time. The scheme design is considered the best approach when taking into account the objectives and the other constraints in the area, such as the narrow width of Park Road under the railway bridge and the geometry of the junction of Park Road with Victoria Road.</p> <p>The scheme seeks to address the issues mentioned in the Project Rationale document, which is publicly available on the project page, namely:</p> <ul style="list-style-type: none"> <li>• Lack of cycle connection with Pymmes Park and North Middlesex Hospital from the North through Cycleway 1.</li> <li>• Lack of infrastructure suitable for all active travel modes.</li> <li>• Insufficient and unsuitable crossing facilities for all active travel users.</li> <li>• High motor traffic volume on Park Road, a residential street, used as a cut-through route.</li> </ul>

6.4	Objection that cyclists do not use dedicated cycle infrastructure and continue to use pavements/roads	The dedicated cycle infrastructure was introduced to encourage more people to shift to active modes of travel, particularly those who are currently less confident to do so. There is no restriction on the use of roads by cycles. Cycling on footways is still unlawful and a matter for the local police.
6.5	Objection that the scheme has made parking/loading more difficult for residents	40.5% in the Haselbury ward and 53.5% in the Edmonton Green ward have no access to a car. The scheme is not likely to have made the parking situation materially worse for residents, particularly as only two parking spaces were removed. One of the aims of the scheme is to enable a shift from use of private vehicles to alternative more sustainable modes of transport. Implementing further Controlled Parking Zone in the area could be investigated in the future if there is sufficient support and funding available.
6.6	Objection based on the view that the one-way system should be amended	No one-way system has been implemented as part of this project.
6.7	Objection that the scheme is not sufficiently enforced (i.e., vehicles contravene restrictions)	CCTV camera enforcement is in place. The width of the road between the planters at Park Road has been reduced to the minimum required to allow through access for cyclists and exempt motor vehicles such as emergency services, so that drivers are discouraged from contravening the restrictions. Camera enforced restrictions may not be as effective as a physical closure in preventing non-compliance by motor traffic. However, camera enforced modal filters allow emergency service vehicles to pass through key routes.
6.8	Objection about the use of cameras	The use of CCTV camera in this project has been at the request of the emergency services to enable their continued access to the area.
6.9	Objection that the scheme makes it difficult for pedestrians to cross the road	The interventions introduced as part of the trial project, include traffic calming measures, widened footways, additional crossing points, and shorter crossing distances, making it easier for pedestrians to safely cross the road.

**7 Miscellaneous**

<b>Ref</b>	<b>Nature of objection</b>	<b>LBE response</b>
7.1	Objection that the scheme has not achieved the stated objectives (i.e., Increasing cycling journeys)	<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. These objectives and how the trial has met them have been discussed in the main body of the report.</p> <p>Across the surveyed locations that form part of the cycle route (Fore Street north of Park Road, Park Road, and Sweet Briar Walk), the raw ATC results show an overall increase in cycle activity by approximately 216 cycle journeys per day (98%). As the classified cycle link counts revealed approximately 76% additional cycle journeys compared to the ATC results, this percentage rises to 136% (301 additional cycle trips) after calibrating the ATC figures accordingly.</p>