

Appendix 1: Statutory consultation (amendment to the Fox Lane Quieter Neighbourhood area including the provision of permits)

Notice of the intent to make a traffic order was published in the London Gazette and Enfield Independent newspapers on 23 March 2022. The statutory consultation period ended 21 days later on 13 April 2022. Statutory consultees were sent notice of the traffic order.

16 objections opposing the order and 2 representations supporting the order were raised during the consultation period. A further objection was received quoting the TMO reference (TG52/1498) objecting to the opening of Meadway, however is not relevant to the details of the TMO.

In addition to the 16 objections and 2 representations, the Metropolitan Police Service (MPS) requested a minor amendment to the wording of the clause exempting emergency service vehicles, which will be incorporated into the made order.

The grounds for objections are listed below, together with the officer response.

1. General

Ref	Objection based on the grounds that:	LBE response
1.1	The amendments shouldn't be necessary because the whole QN should be removed, or that the improvements aren't sufficient or don't address address concerns previously raised.	The portfolio report PL 22.072 P published in January 2022 sets out the reasons and recommendation to retain the Fox Lane QN. Making these changes does not preclude the Council's abilities to make changes in future.

2. Permits for Blue Badge holders

Ref	Objection based on the grounds that:	LBE response
2.1	The new proposal fails to acknowledge or understand how the Blue Badge scheme works and how it is used by the holder. This is because a Blue Badge is registered to a holder rather than a vehicle and can be used in any vehicle the holder is travelling in.	Details of a specific vehicle need to be registered so that it can be recognised by the camera enforcement system and the exemption applied. Eligible Blue Badge holders therefore must apply for a permit and nominate a vehicle to be exempt from the camera enforced filters. The exemption permit issued is virtual and does not require the Blue Badge to be displayed. Permit holders have some flexibility to change the registered vehicle.
2.2	The provision for permits is not wide enough.	The council is developing its approach to exemptions. Further categories may be added in future.

	<p>Specifically, some references were made to:</p> <ul style="list-style-type: none"> • Disabled people who are cared for by family, friends and professional carers • Disabled people who do not hold a blue badge • Disabled people and/or Blue Badge holders who do not live inside the QN • Family members caring for those with a protected characteristic • SEN transport carrying children to and from Durants Special school <p>One objection went on to say that because of this, residents are not being treated equally and fairly.</p>	<p>There is clear benefit in exempting Blue Badge holders living in the QN and this is being taken forward currently.</p> <p>Provision is being made to exempt Dial-a-Ride vehicles from the camera enforced filters. These services were identified during the Equalities Impact Assessment as a preferred means of transport by some disabled people or those who may find it more difficult to walk or cycle.</p>
2.3	<p>The proposals do not assist Blue Badge holders, elderly people, disabled people and/or critically ill people living on Derwent Road, Lakeside Road, Grovelands Road, Devonshire Road and Old Park Road as they are still not able to exit their roads at their junction with Fox Lane.</p>	<p>Blue Badge holders within the QN will be able to utilise all existing and proposed camera enforced filters, providing additional options for entering and leaving the area.</p>
2.4	<p>The Council has been forced in to making the changes because of discrimination, and no apology has been made.</p>	<p>The Council is introducing the exemptions for Blue Badge holders and Dial-a-Ride vehicles in response to its Equalities Impact Assessment and wider feedback.</p>
2.5	<p>The scheme is limited to one vehicle only per Blue Badge holder, and it should be more (one objection suggested it should be two, another suggested that permits should be provided to all friends, family and carers).</p>	<p>Permit holders will have some flexibility to change the nominated vehicle.</p> <p>The Council is reviewing its wider approach to exemptions for QNs which will continue to be progressed.</p>

3. 'No motor vehicle' restrictions

Ref	Objection based on the grounds that:	LBE response
3.1	<p>Adding more cameras would generate more money / is money gathering</p>	<p>The changes are being proposed to improve permeability for Blue Badge holders and emergency services. Camera enforcement is necessary to enable this.</p>

3.2	<p>The scheme has wasted money as the barriers initially installed will be removed</p>	<p>The benefits of the changes with respect to improved access for Blue Badge holders and the emergency services outweigh the expected cost.</p> <p>Planters installed will either remain in place or can be removed and allocated to another project. Flexible materials were selected to be installed as part of the experimental approach taken to initially implement and monitor the QN.</p>
3.3	<p>Five physical closures are retained (Derwent Road, Lakeside Road, Grovelands Road, Devonshire Road and Old Park Road).</p> <p>Specific comments related to:</p> <ul style="list-style-type: none"> • The proposal fails to address disabled people who live on the roads that will retain physical closures (Old Park Road, Grovelands Road, Derwent Road, Lakeside Road). Some objections also mentioned Devonshire Road. • Emergency service access remains impeded by these locations, which disproportionately impact protected groups. • LAS requested “that hard closures be avoided where possible in favour of camera enforced or soft closures to ensure unimpeded emergency access and egress is maintained”. • No reason is given for retaining some of the hard closures. It’s likely that converting all filters to camera enforced would only result in a potentially small increase in motor traffic. • Reasons for selecting the three locations (Fox Lane, The Mall, and Oakfield Road) are not clear; they provide similar routes to each other 	<p>Blue Badge holders within the QN will be able to utilise all existing and proposed camera enforced filters, providing additional options for entering and leaving the area.</p> <p>The Council has invested in technological solutions so that mapping updates are made to commercially available navigation solutions such as Google, TomTom and Bing. This enables the emergency services to update their own navigational systems as they deem necessary. The Council remains committed to working with emergency services through regular dialogue and continues to work with the LAS to gain greater insights into the causes of any delays. The Council will continue to respond to any further measures that are identified, beyond the work already done, to ensure that LAS navigational systems have access to the latest data.</p>

	and / or all run off Cannon Hill, compared to the five locations off Aldermans Hill which are proposed to remain as hard closures.	
3.4	Not enough information was provided for residents to assess if replacing more bollards with cameras will permit manageable access to the family and friends of those with mobility problems or other needs.	Details of the proposed locations and those eligible for permits, including a map, was provided with the traffic order documentation.

4. Themes not relevant to the details of the proposed amendments

Ref	Comment	LBE response
4.1	<p>Many grounds for objections were related to not supporting the Fox Lane QN as a scheme.</p> <p>Themes raised included:</p> <ul style="list-style-type: none"> • Large vehicles/HGVs being forced to reverse the full length of the filtered roads and out onto boundary roads and associated safety concerns • Crime, and fear of crime, has increased since the implementation of the Fox Lane QN scheme, in particular by women and girls • Enfield reported that there had been no improvement in air quality / being ineffective on climate change • Negative impact on bus journey times • Congestion on the boundary roads leading to Southgate Circus have seen a disproportionate increase in displaced vehicular traffic • Signage is unclear and leads to unfair fines • Impact on emergency services, support vehicles, refuse collection and delivery services • Displacement of traffic to other roads 	<p>These are not relevant to the making of the traffic order this decision refers to. The Council has previously responded to grounds for objections to the making of the Fox Lane QN main traffic orders permanent in its January 2022 report. A link to this report is here: PL 22.072 P - Annex 4 Responses to Objections (002) - 26 JAN 22.</p>

	<ul style="list-style-type: none"> • Longer, slower and more polluting car journeys • Impact of traffic on boundary roads, and air quality concerns • The QN benefits the wealthier residents inside the QN area at the expense of those outside the QN area • Impact on traffic during roadworks, and limited alternative routes being available • Empty, unsafe cycle lanes introduced at considerable cost • Community division • Favouring small groups of people • Distrust in local politics • Alienation from a cause that most would support given decent engagement and debate. • Rejection of certain views • Not responding thoughtfully to concerns raised • The project doesn't have majority support • Money-gathering scheme • Impact on carers, disabled people, businesses, tradespeople, delivery services • Impact on mental health 	
4.2	Some objections referred to the concept of potential changes to the Meadway filter.	Changes to the Meadway filter, other than introducing permits and exemptions for Dial-a-Ride vehicles are not proposed as part of this traffic order.