

## Haringey Adult Social Care Joint Partnership Board

Tottenham Town Hall  
Town Hall Approach Road  
London  
N15 4RX

**13th August 2022**

Dear Councillor Hakata,

### **LOW TRAFFIC NEIGHBOURHOODS (LTN) – EXEMPTIONS POLICY**

Further to your email of 14th July, the Joint Partnership Board (JPB) has again met to discuss the question of the lack of consultation as regards the LTN implementation and the detail contained in the exemptions policy involved.

There is concern not only about the issue in hand, but about the Council's commitment to the principle of co-production, which appears to be in question given the experience the JPB has had in relation to this issue.

As you know JPB held two meetings about the LTN earlier this year, and there was deep seated concern about the failure to properly consult with elderly and disabled residents, carers, and mental health service users in particular. Their concerns were informed by the considerable difficulties that their counterparts in other boroughs had experienced as a result of the introduction of LTNs. They would question any assertion that the imposition of LTNs was a trouble-free process in other boroughs, though they are pleased that Haringey took the initiative, in commissioning Systra, before implementation rather than after implementation. That is good practice in co-production.

In March, the JPB was advised that consultants would be appointed to look further into the question of exemptions for blue badge holders, carers and others. We asked for details of the consultant's brief but got no reply. In April, a council representative attended the JPB's meeting and advised that the consultants would start their work on 29th April, and that some exemptions as previously agreed by Cabinet would remain. In May we were told that Systra had been appointed to undertake this work.

In June the JPB meeting was told that the consultation was ongoing, and the data was being analysed, and it seemed that some individual members had been involved in a consultation event but others who had volunteered had not.

We asked the officer attending whether the JPB would see the draft before it was submitted to Cabinet, and what additions were proposed to be made to the exemptions criteria.

There was particular concern about which people and vehicles would now get exemptions, especially as regards disabled people and carers who live outside of an LTN but needed to visit family or clients, as well as about people on the margins of being registered disabled. There was a real fear expressed that many vulnerable people would be denied visiting by friends and family who would be deterred by an overzealous scheme. The importance of taxis and minicabs being able to pick up or drop off at addresses within the LTN was discussed extensively, as was concern about those who are not digitally enabled.

We heard nothing more until 12th July when we were allowed to share the report going to Cabinet outlining the revised exemptions policy. Feedback was required by 13th July. The report and appendices ran into scores of pages, and this was totally unacceptable for the JPB to be expected to form a view in the time available, and this was relayed to you immediately.

The JPB considered the matter further at its meeting of 28th July. We have seldom chaired such an angry meeting. Members had followed the matter closely for many months and many had participated in various consultations over a long period, but felt let down and ignored, having given much of their time to a matter of huge practical concern to them. They asked:

- Why the consultant's brief had not been shared with them?
- Why the consultant had not come to discuss their findings with the JPB?
- Why were several who offered to participate not contacted?
- Why they have not had sight of the final Systra report?
- Why they had not been given an opportunity to comment in good time, on the revised exemptions policy before being finalised at cabinet?
- Why were the Equality and Diversity assessments not shared earlier?
- Why is there no reference at all to the consultation with the JPB in the report?
- Was the consultation they had pressed for ever intended to be genuine, and meaningful?

So far as the conclusions of the report are concerned, the view of the JPB is that it represents very little advance on the previous exemptions policy to which there were so many objections.

There are inaccuracies in the report, and there is particular annoyance about the misrepresentation on the conclusions of Transport For All's 'Pave the Way' report. We also note the Equalities Assessments referred to in the report, seem to pre-date the recent consultations in 2022, and thus could not have taken into account relevant issues put forward during them. This puts in doubt the borough's exercise of its public sector equality duty on this matter. There clearly has been a disregard of those with protected characteristics in our opinion.

Whilst understanding the sustainability objectives of the LTNs, the JPB remains deeply concerned about their effect on a broad range of members of our reference groups, and the limitations that it will place on the lives of some of the most disadvantaged in our borough on a day-to-day basis. The promise in your recent letter of an eventual long-term benefit of LTNs for our disabled and others reference group members seems cynical to many.

Amongst the concerns are the right of blue badge holders to enter LTNs, the limitations on SEND transport, which seem cruel, and the ability to use taxis in the LTN by those who may be ill, isolated or of limited mobility. How for example might someone of limited mobility reach an essential hospital appointment? And how might their on-line grocery shopping be delivered in future? The advent of online shopping has been of great benefit to many in our reference groups, and it seems that they will be denied this advantage, if delivery vehicles cannot enter the streets in the LTNs. These are just some of many scenarios which have occurred to JPB members.

There is little regard too of the context in which this is being introduced. Many represented by our reference groups are greatly affected by sharp rises in the cost of living and indeed the cost of transport. The prospect of them facing parking fines and financial penalties as a result of the infringements is alarming. Some dependent on cars are concerned about the time and petrol cost that will be involved by having to circumvent LTNs.

We are alarmed too about the coming weeks in which there may be disarray as regards exemption arrangements, and the means of applying for them. Already we have reports from family members seeking information, being met with confusion from Council staff at Wood Green Library about the exemption arrangements.

Finally, the Cabinet Report refers to monitoring arrangements for the LTN post implementation, against which the exemptions policies may be adjusted in due course. The JPB would like to have the details of these arrangements and requests involvement in them, and indeed in an appeals process as yet to be determined. We assume there will be some independent membership of these arrangements?

We look forward to your comments, and to receiving assurance of the Council's commitment to both co-production principles and to its public sector equalities duties.

Kind Regards,

**Helena Kania and Sharon Grant**

Joint Chairs - Haringey Joint Partnership Board

**For information:** Public Voice, which runs and manages Healthwatch Haringey, was commissioned by Haringey Council in 2017 to establish and support the running of the Joint Partnership Board and its Reference Groups in order to provide an interface with residents, service clients and carers in Haringey, with the intention of ensuring meaningful dialogue on strategies and policies that will impact on them. It is made up of representatives of a number of active Reference Groups to ensure that their particular needs are taken into account. Reference Groups comprise specific groups of people and include: learning disability; autism; older people; mental health; physical disability; dementia; severe and complex learning disability and autism; carers; those transitioning from child to adult social care.