

Freedom of Information Act 2000 (FOIA)
Environmental Information Regulations 2004 (EIR)
Decision notice

Date: 17 November 2021

Public Authority: London Borough of Enfield
Address: Civic Centre
Silver Street
London
EN1 3XA

Decision (including any steps ordered)

1. The complainant submitted a number of requests to the London Borough of Enfield ('the Council') concerning low traffic neighbourhood schemes as well as further requests on other issues. The Council initially responded to the requests but refused to answer any further requests on the basis of section 14(1) of FOIA because they were vexatious.
2. The Commissioner has determined that all of the outstanding requests submitted to the Council by the complainant should be considered under the EIR rather than FOIA. However, she is satisfied that the Council is entitled to refuse to comply with all of these outstanding requests on the basis of regulation 12(4)(b) (manifestly unreasonable) of the EIR and that in all the circumstances of the requests the public interest favours maintaining the exception.
3. The Commissioner does not require the Council to take any steps.

Background

4. A significant number of the requests which are the focus of this complaint concern low traffic neighbourhood schemes (LTNs) introduced by the Council, in particular, the scheme introduced in the Fox Lane area of the borough.
5. By way of background, in November 2019 the Council launched a public exhibition for the Fox Lane scheme and in March 2020 it published the engagement feedback it had received. In July 2020 the Council published revised designs for the scheme.
6. In September 2020 the implementation of the LTN for Fox Lane began with a six month consultation period launched in October 2020. In May 2021 the Council extended the consultation period until July 2021.¹

Request and response

7. Following the receipt of a number of information requests from the complainant on the topic of LTNs – all of which it had responded to - the Council contacted him on 23 March 2021 and explained that it had concluded that his requests on this subject were unreasonably persistent and that any future requests on this subject would be considered to be vexatious, in line with section 14(1) of FOIA. The Council explained that any further correspondence or requests that he submitted on this subject matter would be considered and read by the relevant team, however a response would not be provided to him and his correspondence would simply be placed on file.² The Council also noted that the complainant had submitted extensive FOI requests on other subject matters and it may extend its decision to deem other requests vexatious if they followed the same approach.³

¹ Information taken from <https://letstalk.enfield.gov.uk/foxlaneQN>

² Section 17(6) of FOIA allows a public authority not to issue a refusal notice when the public authority has already given the same person a refusal notice for a previous vexatious or repeated request and it would be unreasonable to issue another one.

³ The complainant had submitted 32 requests to the Council in the period 18 December 2020 to 18 March 2021.

8. The complainant contacted the Council on 23 March, 15 April and 20 April 2021 to express his dissatisfaction with this decision. As part of this correspondence the complainant stated that:

'I would suggest you take just one moment to consider people's disabilities. Not all are visible.

If you continue to treat me in this manner I will be addressing this formally with my medical diagnosis and your conduct towards me and the use of your vocabulary in your letter which is is [sic] perceived to be incredibly discriminatory.

I would suggest you amend your letter and reissue, and that you consider the above next time you address me in such a disgusting, derogatory and insulting manner - making it even worse with language that is entirely unjust and inequitable regarding my disability.'

9. During the same period the complainant also submitted a number of further requests to the Council, some on the subject of LTNs and some on other matters. The Council did not issue a refusal notice or provide any response to the LTN related requests in line with the position set out in its letter of 23 March 2021. The non-LTN related requests were responded to.
10. The Council contacted the complainant on 5 May 2021 and addressed the specific points of dissatisfaction that he had made in his various emails. In respect of the complainant's concerns about the language used by the Council and its failure to take into account his disability, it stated that:

'We have considered whether the content of the letter was inappropriate, disrespectful, or discriminatory as you alleged, however we do not accept that this was the case. The letter clearly states why your various FOI requests could not be actioned by specifically referring to the relevant sections of the Freedom of Information Act 2000. We understand that you are dissatisfied with the fact that the Council has decided not to proceed with your requests, however we consider that the reasons provided in [name redacted] letter are legally founded and in accordance with the ICO guidelines.

You also said that if the Council continued to treat you in this manner, you were going to address this formally with your medical diagnosis. It is also suggested that we have used vocabulary which are perceived to be discriminatory. Please note that the Council takes the issue of disability very seriously and will not knowingly commit or condone acts of discrimination.

We note that your medical issue was not raised until after you received our letter alerting you to the vexatious nature of your requests before you brought it to our attention. We are also not aware of your disability, how it impacts on you and what reasonable adjustments are required. Please note that a reasonable adjustment would be required if there is evidence that you suffer from a condition which has a long-term effect, and which is likely to affect your daily activities. The requests you have made do not indicate that you have any difficulty with making requests for data or understanding our responses. In light of the above we stand by our decision.'

11. As the above quote indicates, the Council upheld its decision that any future requests on the topic of LTNs would be refused on the basis of section 14(1) of FOIA and that no refusal notice would be issued in response to these requests. However, the Council explained to the complainant that as he had requested in his email of 23 March 2021, it would provide him with a full list of all FOI requests he had made, and would identify the ones considered to be vexatious.⁴
12. The complainant subsequently submitted further requests to the Council, both on the subject of LTNs and other matters, with some of those falling into the latter category being responded to.
13. The Council contacted the complainant again on 18 June 2021 and noted that its letter of 23 March 2021 had informed him that any future requests on the subject of LTNs would be rejected on the basis that they are vexatious. The Council also noted that its previous letter explained that it reserved the right to apply this decision to future FOI requests which were unrelated to LTN schemes. The Council explained that the complainant had made a total of 20 requests since 23 March 2021, 6 of which were on the subject of LTNs. The Council explained that it had not logged or responded to them on the basis that it considered them to be vexatious. The Council explained that it had however, responded to 8 of the requests submitted between 23 March 2021 until present which were not on the subject of LTNs.
14. However, the Council explained that it had reviewed the outstanding requests and considered that the number submitted are excessive, disruptive and were placing an unreasonable burden on it. The Council noted that many of the unanswered requests are traffic and/or parking related. The Council noted that on several occasions, whenever a request is responded to, the complainant proceeded to submit a new request or raise further questions in response. He had also requested

⁴ The Council provided this to the complainant on 17 June 2021.

several internal reviews. The Council suggested that although FOIA was designed to give individuals a greater right of access to information, with the intention of making public bodies more transparent and accountable, it is considered that he had been abusing that right and his requests have now become unreasonable. The Council therefore explained that it was rejecting the six outstanding requests dated 20 May (2 requests), 27 May, 1 June, 13 June and 16 June 2021 (which were on subjects other than LTNs) on the basis that they were vexatious, as well as rejecting *all* future FOI requests, on the basis of section 14(1) of FOIA. The Council provided the complainant with its rationale behind this decision focusing on the following: the frequency and context of the requests, the complainant's behaviour, the overlapping subject matter and unreasonable persistence. The Council explained that it would however respond to any outstanding requests which were submitted before 23 March 2021 (the Council explained its records suggested that there were two such requests, CRM FOI 9840 and 9664⁵).

15. Further to this letter, the complainant submitted two further requests to the Council on 21 and 25 June 2021. The Council did not provide any response to either request.

Scope of the case

16. The complainant contacted the Commissioner on 4 May 2021 in order to complain about the Council's refusal to answer the requests he had submitted on the subject of LTNs, subsequent to 23 March 2021, on the basis of section 14(1) of FOIA.
17. Following the Council's letter of 18 June 2021, the complainant explained that he was also dissatisfied with the Council's decision to refuse the requests submitted on 20 May, 27 May, 1 June, 13 June and 16 June 2021 on the basis that they were vexatious, as well the Council's position that it was intending to reject *any* future FOI requests from him on the basis of section 14(1) of FOIA.
18. In order to clarify the current position the Commissioner has listed in the annex at the end of this notice the requests which the Council is refusing to answer on the basis of section 14(1). In order to put these requests into context, and for the purposes of her analysis below, this annex also includes details of all the requests the complainant has

⁵ The Council has now issued a response in relation to both requests.

submitted to the Council, beginning with his initial request of 18 December 2020.

19. The scope of the Commissioner's role in respect of this complaint is therefore to consider:
 - (i) the Council's refusal to answer requests submitted on the subject of LTNs that were submitted to it after 23 March 2021.
 - (ii) the Council's refusal to answer any outstanding requests on subjects other than LTNs as outlined in its letter of 17 June 2021.
 - (iii) the Council's position that it does not have to issue a refusal notice in relation to any requests which it is seeking to refuse to answer on the basis of section 14(1) of FOIA.
20. During the course of her investigation of this complaint, the Commissioner decided that the requests which the Council had refused to answer on the basis of section 14(1) of FOIA concerning LTNs should have been handled under the EIR. (The Commissioner's rationale for this is discussed in more detail below.) The Commissioner informed the Council, and the complainant, of this finding during the course of her investigation.
21. Furthermore, having considered the additional requests which the Council is seeking to refuse on the basis of section 14(1) that are not focused directly on LTNs, the Commissioner is also satisfied that these requests fall to be considered under the EIR rather than FOIA. (Again, the Commissioner's rationale for this is discussed in more detail below.)
22. In light of this, the Council cannot rely on section 14(1) (vexatious) of FOIA to refuse these requests. Rather, the equivalent exception in the EIR, namely regulation 12(4)(b) (manifestly unreasonable), should be considered. In light of this, in respect of points (i) and (ii) the decision notice focuses on whether the requests which the Council has not responded to can be refused on the basis of regulation 12(4)(b). The distinctions, such as they are, between these two provisions, and the impact of the EIR rather than FOIA being the applicable regime are discussed in the analysis below.
23. The Commissioner's analysis below also considers how the applicability of the EIR, as opposed to FOIA, affects the Council's obligations in respect of refusal notices in relation to the disputed requests.

Reasons for decision

The applicable access regime

24. Regulation 2(1) of the EIR provides a definition of 'environmental information' including information on:

'(a) the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites including wetlands, coastal and marine areas, biological diversity and its components, including genetically modified organisms, and the interaction among these elements;

(b) factors, such as substances, energy, noise, radiation or waste, including radioactive waste, emissions, discharges and other releases into the environment, affecting or likely to affect the elements of the environment referred to in (a);

(c) measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affecting the elements and factors referred to in (a) and (b) as well as measures or activities designed to protect those elements'

25. In the Commissioner's view the information sought by the complainant's requests concerning LTNs is information on a measure, namely the LTNs, which are likely to affect the state of the environment. For example, measures introduced under the LTN include changes to road layouts and traffic flows. Such measures will affect the state of the element as these will require changes to road layouts and are also likely to affect traffic flows thus having an impact on emissions from vehicles. Consequently, the information sought by these requests falls within the definition of 'environmental information' contained at regulation 2(1)(c) of the EIR.

26. With regard to non-LTN requests which the Council has sought to refuse on the basis of section 14(1), the Commissioner considers that the information sought by these requests still seeks information on measures likely to affect the environment, for example traffic orders (apparently not linked to the LTNs) or other measures associated with the use of roads in the borough. The requested information therefore also falls within the scope of regulation 2(1)(c) of the EIR.

Complaints i) and ii)

Regulation 12(4)(b) – manifestly unreasonable

27. Regulation 12(4)(b) of the EIR provides an exception from disclosure to the extent that the request is manifestly unreasonable. The exception is subject to the public interest test at regulation 12(1) of the EIR.
28. The term 'manifestly unreasonable' is not defined in the EIR. However, the Commissioner follows the lead of the Upper Tribunal in *Craven v Information Commissioner & DECC*.⁶
29. In *Craven* the Tribunal found that there is, in practice, no difference between a request that is vexatious under the FOIA and one which is manifestly unreasonable under the EIR, save that the public authority must also consider the balance of public interest when refusing a request under the EIR. The Commissioner is therefore guided by the Tribunal's approach to identifying vexatious requests, in addition to her published guidance.⁷
30. As the Commissioner's guidance explains, section 14(1) is designed to protect public authorities by allowing them to refuse any requests which have the potential to cause a disproportionate or unjustified level of disruption, irritation or distress.
31. This usually involves weighing the evidence about the impact on the authority and balancing this against the purpose and value of the request. This should be judged as objectively as possible; in other words, would a reasonable person think that the purpose and value are enough to justify the impact on the public authority. Where relevant, this will involve the need to take into account wider factors such as the background and history of the request.
32. Furthermore, a differently constituted Upper Tribunal considered the issue of vexatious requests in *Information Commissioner v Devon CC & Dransfield*.⁸ The Upper Tribunal's approach, subsequently upheld in the Court of Appeal, established that the concepts of proportionality and

⁶ [2012] UKUT 442 (AAC)

⁷ Section 14(1) guidance <https://ico.org.uk/media/for-organisations/documents/1198/dealing-with-vexatious-requests.pdf>

Regulation 12(4)(b) guidance <https://ico.org.uk/media/for-organisations/documents/1615/manifestly-unreasonable-requests.pdf>

⁸ [2012] UKUT 440 (AAC)

justification are relevant to any consideration of whether a request is vexatious. The Commissioner considers that these concepts are equally relevant when assessing whether a request for environmental information is manifestly unreasonable.

33. The Upper Tribunal found it instructive to assess the question of whether a request is vexatious by considering four broad issues:
- (i) The burden imposed by the request (on the public authority and its staff);
 - (ii) The motive of the requester;
 - (iii) The value or serious purpose of the request; and
 - (iv) Any harassment or distress of and to staff.
34. The Upper Tribunal did, however, also caution that these considerations were not meant to be exhaustive. Rather it stressed the: *'importance of adopting a holistic and broad approach to the determination of whether a request is vexatious or not, emphasising the attributes of manifest unreasonableness, irresponsibility and, especially where there is a previous course of dealings, the lack of proportionality that typically characterise vexatious requests'* (paragraph 45).

The Council's position

35. The Council provided the Commissioner with detailed submissions to support its refusal of the requests. The Commissioner has summarised these submissions below, as well as including any additional relevant points from the Council's letters to the complainant of 23 March and 18 June 2021.

Detrimental impact of complying with the requests

36. The Council argued that complying with the outstanding requests would have a detrimental impact for the following reasons:
37. The complainant submitted a total of 28 separate requests between 18 December 2020 to 20 May 2021 on the subject of the LTNs. In the Council's view this was excessive and was placing an unreasonable burden on it to comply with the requests. This is in the context of a total of 52 separate requests from the complainant, alongside 8 internal review requests, since December 2020.
38. The Council explained that it had appointed dedicated officers in various teams across the organisation to assist with managing the complainant's requests and communication effectively. It explained that its Complaints

and Information Team have confirmed that it takes on average one officer in their team approximately 4 hours per day to manage and respond to the complainant's various requests, including responding to internal reviews. The Council explained that officers in other teams, particularly the Traffic and Transportation Team, are also spending on average 4 hours per day gathering the information for, and responding to, the requests and internal reviews. Consequently, the Council explained that the total time spent by officers across the organisation on a daily basis is equivalent to having a member of staff solely employed by the Council to manage his correspondence and requests.

39. The Council emphasised that the complainant's requests are often made in quick succession with multiple requests frequently submitted on the same day or a few days apart, which gives the Council little opportunity to consider and respond to the requests that have already been made. The Council also noted that the subject matter of the requests overlapped. The Council argued that this is evidenced from the chronology of the requests listed in the annex.
40. The Council explained that the sheer volume of requests is putting its resources under significant pressure, detracting from the different services within the organisation being able to complete their day to day duties effectively.
41. The Council argued that the complainant consistently challenges the answers provided in response to requests and is never satisfied with the information received. He will typically submit various follow up enquiries, submit a new request for information following the response or request an internal review, which again, due to the sheer volume of requests being made, is putting a significant administrative strain on Council resources.⁹ The Council suggested that this is evident from request CRM FOI 9896 (submitted on 27 May 2021), which had been submitted asking for further information on the same topic, following the Council's response to CRM FOI 9581 (submitted on 14 March 2021).

⁹ For the avoidance of doubt, the annex attached to this notice simply contains correspondence formally treated as FOI requests by the Council rather than any further correspondence sent to it by the complainant in relation to his FOI requests, for example requests for internal reviews.

Why the impact of answering the requests would be unjustified or disproportionate in relation to the requests themselves and their inherent purpose or value

42. The Council explained that in its view, the complainant's requests are part of a wider fishing expedition and campaign against the LTNs, a position which it argued was supported by the other parts of its submissions to the Commissioner (ie the submissions to support the other sub-headings set out in this notice). The Council argued that the impact of continuing to respond to these requests is unjustified and disproportionate because the requests do not appear to be made out of a genuine desire to obtain information but rather the intent to cause disruption, on the basis of the complainant's clear disagreement with the Council's approach to the implementation of the LTNs. The Council argued that in its view the complainant is abusing his right to genuinely access information and that the provision of the requested information has little value, other than to propel further lines of questioning to Council officers.
43. The Council noted that, it is clear that whatever information is provided to the complainant, he will frequently challenge it and ask further questions, so the information provided is never satisfactory. The Council is of the opinion that continuing to comply with the complainant's requests is not the best use of Council resources nor public money and that the requests themselves are designed to fulfil the agenda of an anti-LTN campaign group. The Council explained that whilst the Council expects a high level of scrutiny in relation to projects such as the LTN schemes, in its view the series of requests goes beyond what is considered reasonable and is detracting from other areas of Council business.
44. The Council argued that the further requests which it refused to answer in its response of 18 June 2021 were also on overlapping subject matters. It noted that these requests largely ask for information relating to traffic schemes, traffic orders and PCNs. The Council argued that in its view as soon as the complainant was advised that it would no longer be dealing with requests on the subject of LTNs, his requests soon shifted focus to other transport and parking matters, which still have some connection to the LTN schemes. This Council suggested that this is evident in the complainant's submission for CRM FOI 9896 and the request entitled 'Cannon Road FOI'.

Details of wider context and history to the requests which supports the view that the requests are vexatious.

45. The Council explained that the complainant was part of a campaign group called 'Stop Enfield LTNs' (it noted that it received email correspondence from the complainant from this group's email address).

The Council argued that the FOI requests are being made with a deliberate intention to cause disruption to the Council and its functions. This is based on complainant's, and the wider campaign group's, clear disagreement with the Council's approach to the LTN schemes.

46. The Council explained that since it had refused to comply with the complainant's requests on the subject matter of LTNs, it had received an FOI request from the complainant's mother on this subject, submitted to it on 2 May 2021. The Council argued that this was a deliberate attempt by the complainant to circumvent the Council's processes in respect of FOIA, rather than waiting for the Commissioner's adjudication of this complaint.
47. The Council argued that the complainant's behaviour is an important consideration in this matter, including the fact that he refused to comply with the Council's processes and often demands that certain officers respond to requests despite it being previously made clear to him that FOI responses are sent on behalf of the whole Council. The Council directed the Commissioner to the request of 4 February 2021, its reference CRM FOI 9307 and the email the complainant had sent in relation to request CRM FOI 9868. Upon receiving a response to that request the complainant had responded by stating:

'Please note the below that Enfield council believe it is effective and appropriate for a PR manager in a cycling department to answer data protection related FOIs.

As below - complaints department refuse to have the DPO [Data Protection Officer] answer the FOI and as shown, the email is clearly signed by off by [name redacted] PR Manager not the DPO. Perhaps when I when wrote to parking I'll get a response from the council tax department.

This must be remedied via ICO on copy as [name redacted] explanation below is of great concern and is not answering my FOI as she does not have any level of suitability to answer a data FOI as per her job role.'

48. The Council argued that the language and tone directed at many officers at the Council is also an important consideration; it explained that it considered the complainant's language to be deliberately derogatory and rude. As an example, the Council cited an email the complainant had sent to it on 14 April 2021 regarding CRM FOI 9583.
49. The Council explained that it is also in receipt of requests from third parties that have connections with the complainant. The Council provided the Commissioner with two such examples and noted that the request reference numbers quoted in the correspondence are FOI responses that were provided to the complainant. The Council argued

that this was further evidence that the complainant was using third parties to submit requests on the subject of LTNs, thus indirectly overriding its decision rejecting his requests, pending a decision on the outcome of this complaint.

50. The Council argued that the volume of all requests submitted by the complainant, as evidenced in the attached annex, is disproportionately high and contributing to an overall aggregated burden. The Council explained that the complainant has also made three formal complaints, two of which he had requested to be escalated to the final stage of the organisation's complaints process. The Council explained that the complainant had also made three separate subject access requests (SAR) under data protection legislation to access information it held about him, with one SAR requesting access to his full file held by the Council which is in excess of 3,000 pages. The Council noted that he had also approached various local councillors to seek responses to requests which the Council had refused to answer on the basis of section 14(1) of FOIA. The Council explained that in its view the complainant's intention is to bombard it with high volumes and relentless correspondence, submitted via different channels.
51. The Council argued that the complainant had displayed alarming conduct when using his social media platform, particular regarding his responses to a director of the Council on her Twitter account. In support of this position the Council suggested that it appears that the complainant read her posts and re-tweeted some of the contents, with his re-tweeted comments appearing to call into question her character and credibility (the Council provided the Commissioner with the tweets in question). The Council explained that the director in question is the director of the Place Department at the Council, which oversees all matters relating to traffic schemes, LTNs and parking, which are the subject of the majority of the complainant's FOI requests. The Council suggested that the complainant had developed a personal grudge against this director. In support of this position, the Council cited a particular instance where the complainant had suggested that the director had breached the law by cycling over the speed limit, when this was not in fact the case. The Council also provided the Commissioner with social media posts by the Stop Enfield LTNs group directed against certain officers at the Council and councillors and noted the group's fixation on those individuals to resign from their posts. The Council explained that the complainant was affiliated with this group.
52. The Council explained that it was also of the view that the complainant refused to comply with its processes. By way of example it referred the Commissioner to an email exchange between 1 and 3 June 2021 regarding CRM FOI 9796. The Council noted that in these emails it clearly set out the correct recourse and process to follow in light of the complainant's dissatisfaction with the FOI response provided but the

complainant's response demonstrated an unwillingness to engage with the Council on that basis. The Council also provided the Commissioner with an email exchange it had with the complainant on 18 June 2021 noting that it had asked the complainant to clarify what he was dissatisfied with in relation to certain responses, however the complainant did not provide the requested clarification, which it argued again attested to the complainant's unwillingness to engage with the Council.

Miscellaneous points

53. In her initial enquiries to the Council, the Commissioner noted that refusal notice explained that the complainant had been asked to use a single point of contact but that this advice had been disregarded. The Commissioner asked the Council to provide evidence of this.
54. In response, the Council provided copies of communications sent to the complainant on 27 January and 17 February 2021 which directed him to a specific email address which should be used for all of his communications with the Council, including information requests. The Council also provided the Commissioner with requests the complainant had sent to the Council on 5 March 2021, 27 April 2021 and 3 May 2021 which had not been sent to the specific email address it had previously provided.

The complainant's position

55. The complainant submitted detailed submissions to the Commissioner in support of his position that his requests were not vexatious and these are summarised below:
56. Firstly, the complainant argued that his requests on the subject of LTNs did not 'overlap' as the Council had argued. Rather, he explained that every request had very specific and unique questions which the Council had not previously answered and that the requests were on very different topics surrounding LTNs. The complainant noted that in order to avoid any such conflict about overlapping requests, he had asked the Council to itemise such requests. He explained that the Council had not responded to this.
57. Secondly, the complainant suggested that if the Council felt that answering FOI requests are a hindrance to its operations, then he suggested that it should employ dedicated team members to ensure it could fulfil its legal duties in releasing data.
58. Thirdly, the complainant argued that there is a lack of transparency by the Council regarding LTNs which had resulted in him having to make these requests. For example, he noted that the Council had refused his request of 14 April 2021 regarding specific details of the Fox Lane LTN

when it had previously shared the same data for the Bowes LTN to other residents. The complainant argued that the Council was therefore blocking access to the information concerning Fox Lane, wrongly stating the work to obtain it would take too long when they have already done this for another scheme in the borough.

59. Fourthly, the complainant argued that there was a genuine need for the information he had requested to be disclosed, and that in his view vexatiousness can only exist where there is no reasonable ground to need the information. He explained that the Council was responsible for introducing blocks to his driving route by implementing LTNs and that he was the designated driver of Motability car.
60. Furthermore, the complainant explained that he was also the admin in charge of a campaign group (Stop Enfield LTNs) with 1,800 members who send him questions they want answered, and who all rely on information being released via FOI in order to ensure that the public interest is met and nothing about the LTNs are being concealed. The complainant noted that many of the members, on whose behalf he submitted the requests, were from protected groups.
61. The complainant explained that the deadline for the local community to object to the emergency traffic order (which allowed for the amendments to the roads in the Fox Lane LTN) was on 19 May 2021. He argued that the Council was creating false and meritless allegations which are unfounded and baseless to deter him, the protected groups of individuals and the wider 1,800 individuals in the campaign and who he represented, from having the information they needed to form part of their legal objections.
62. The complainant argued that the Council cannot chose to fabricate reasons to prevent him from accessing information purely because of the level of detail it will need to release to the public and the effects that will have on its LTN scheme which is installed under the same guidance as was issued by Transport for London 'streetspace programme'. (The complainant noted that Justice Laing had found that programme to 'lawless'.¹⁰) The complainant noted that the same guidance applies to the Fox Lane LTN which is the sole purpose of the Stop Enfield LTNs group, ie to ensure 'our' rights are not further infringed and the roads closed under this guidance are reopened.
63. Finally, the complainant argued that the Council had failed to make any reasonable adjustments about the inaccessible information they

¹⁰ <https://www.bbc.co.uk/news/uk-england-london-55724093>

continued to withhold from the public, despite being informed of his disability and not had taken into account how he submits his requests and the way in which he communicates them.

The Commissioner's position

64. The Commissioner acknowledges that the introduction of LTNs have a significant impact on local communities. It is understandable that those who are most directly affected by them wish to be provided with information about their operation by the relevant local authority, not least so that they are in a position to respond to any consultations or surveys about such measures. In the context of this case, the Commissioner notes that the consultation about the Fox Lane LTN was running at the point the complainant submitted his requests. The Commissioner also acknowledges that as the complainant noted in some of his requests and correspondence, he wanted access to information in order to inform responses to the consultation.
65. In addition, the Commissioner accepts the decision to introduce the Fox Lane LTN is one that appears to have caused strong feelings in the local community with groups both supporting and opposing the scheme. The Commissioner therefore accepts that there is a broad public interest in the disclosure of the information concerning the Fox Lane LTN and, information on other LTNs and the streetscape programme. In other words, the Commissioner accepts that certainly in respect of some of the complainant's earlier requests there is some genuine purpose and value to them.
66. Nevertheless, the Commissioner recognises that the Council has (and continues to) proactively publish information about the LTN on the dedicated project page.¹¹ Furthermore, in the Commissioner's view the purpose and value of the complainant's requests arguably declines as the complainant submitted more and more requests to the Council. She accepts that the pattern of requests submitted by the complainant supports the Council's view that the intention behind the requests moves away from a genuine desire to access the information sought into potentially wanting to disrupt the Council. Moreover, even if this was not the intention, the Commissioner is satisfied that any purpose or value of the unanswered requests is significantly outweighed by the burden and impact complying with the unanswered requests would place on the Council, particularly when taking into account the information it had proactively disclosed and also the information it had already disclosed in response to requests from the complainant on this subject. As a result,

¹¹ <https://letstalk.enfield.gov.uk/FoxLaneQN>

the Commissioner is satisfied that all of the outstanding requests are manifestly unreasonable. Her reasons for reaching this finding are set out below.

67. In respect of the burden placed on the Council, in the Commissioner's view the volume and nature of the requests submitted by the complainant over the period in question is significant. As the annex demonstrates in the period 18 December 2020 to 25 June 2021 the complainant submitted 52 requests, the equivalent of approximately 2 requests per week. However, as evidenced by the annex, many of the requests were submitted in close succession, with numerous requests being submitted on the same day. Many of the requests also contained multiple questions. As the Council's submissions state, managing the complainant's request correspondence involved approximately 8 hours of officer time each working day. Taking into account the pattern and nature of the requests, and having had sight of the Council's correspondence with the complainant in relation to each of the requests that it responded to, the Commissioner has no reason to dispute this estimate. As a result, whether it was the complainant's intention or not, the Commissioner accepts that the requests both on the subject of LTNs and on other non-LTN matters, were imposing a significant burden on the Council. She therefore has no hesitation in accepting that complying with the unanswered requests, both the LTN and non-LTN ones, would only add to this burden. Furthermore, in the Commissioner's view it unsustainable to expect a public authority, even one the size of the Council, to have to consistently devote such an amount of resource to answer the information requests from one individual on a relatively focused subject matter (ie LTNs and other traffic and parking issues).
68. The Commissioner accepts the Council's point that the complainant's behaviour towards it, and the way in which he has managed his correspondence with the Council, has contributed to this burden. A clear example of this is the complainant not using a single point of contact email address that was provided to him on a number of occasions.
69. The Commissioner also accepts the Council's point that other aspects of the complainant's behaviour indicate a pattern of manifestly unreasonable requests. For example, the Commissioner accepts that the evidence suggests that it is likely that the complainant used third parties to submit requests following the Council's application of section 14(1), and in her view this arguably demonstrates an unreasonable persistence and an unwillingness to wait for the Commissioner to adjudicate on his complaint.
70. The Commissioner acknowledges the complainant's point that he was making some of these requests on behalf of others and/or the campaign group of which he was a part. However, this did not lessen the impact

on the Council of responding to the requests which he submitted to it. In any event, as the Commissioner's guidance on section 14(1) explains:

'If a public authority has reason to believe that several different requesters are acting in concert as part of a campaign to disrupt the organisation by virtue of the sheer weight of FOIA requests being submitted, then it may take this into account when determining whether any of those requests are vexatious.'

71. Whilst this is not exactly the scenario that was happening here, this approach does suggest that it is appropriate to see the requests submitted by the complainant – even if they were submitted on behalf of other individuals – to be relevant to the assessment of regulation 12(4)(b).
72. In relation to whether the requests overlap, the Commissioner accepts that the LTN requests may all seek distinct and discrete pieces of information, but there is clearly a commonality in respect of the subject matter. The complainant's frequent follow up requests to responses on LTN issues also seek further information on related points. Furthermore, the Commissioner agrees with the Council's characterisation of the pattern of requests following its letter of 23 March 2021. That is to say, once it had refused to answer any further requests on LTNs, as the annex shows, the complainant shifted the subject of his requests onto matters linked, or closely related to LTNs. Again, the Commissioner accepts that this is evidence of an unreasonable persistence on his part and supports the view that not only are the requests on the subject of LTNs manifestly unreasonable but so are the other non-LTN requests given the linked subject matter.
73. Furthermore, the Commissioner accepts the Council's view that the complainant's persistence in submitting the requests, despite its letters of 23 March and 18 June, provides some evidence of an intention to arguably disrupt or burden the Council rather than a genuine desire to access the requested information.
74. The Commissioner is conscious that the complainant has argued that the Council has failed to take into account his disability when dealing with (and ultimately refusing) his requests. However, in her view the Council's response of 5 May 2021 in response to the complainant's earlier emails outlining his concerns in this regard (both quoted above at paragraphs 8 and 10 respectively) is a fair and reasonable one. The Council noted that it was not aware of his disability and suggested that it would need to be made aware of any individual's disability in order to determine what reasonable adjustments could be put in place. It is the Commissioner's understanding that the complainant did not provide the Council with the details it suggested prior to its refusal of the requests

set out in the annex, or indeed in the context of any internal reviews and/or follow up enquires.¹²

75. The complainant has, in confidence, provided the Commissioner with further details of his disability. The Commissioner is clearly not in a position to accurately judge the extent to which any individual's disability affects their behaviour. That said, in the circumstances of this case whilst she accepts that the complainant's disability may affect how he communicates, she does not consider that this in itself provides a basis to reject the Council's refusal of his requests. In any event, for the reasons outlined above, in the Commissioner's view the Council has provided a clear and compelling case that all of the unanswered requests are manifestly unreasonable, and even allowing for the complainant's disability and manner in which this could affect his communications with the Council, this does not alter her decision.
76. With regard to the letter that was sent to the Council on the complainant's behalf on 20 September 2021, the Commissioner's role in determining how a public authority has handled an EIR request is limited to considering the circumstances that existed at the point a request was refused. As the above chronology makes clear, all of the requests which are the focus of this complaint were submitted prior to 20 September 2021 and therefore prior to the Council receiving the letter from the complainant's legal representative. Therefore, although the letter refers to circumstances that existed at the time of the requests, they are not factors which the Council could have reasonably taken into account. Consequently, in that particular context, the Commissioner has not had regard to the letter in reaching her decision in relation to regulation 12(4)(b) when assessing the Council's refusal of the requests listed in the annex to this notice decision.

Public interest test

77. Regulation 12(4)(b) is subject to the public interest test. Regulation 12(2) of the EIR requires a public authority to apply a presumption in favour of disclosure when relying on any of the regulation 12 exceptions. As stated in the Upper Tribunal decision *Vesco v Information Commissioner* (SGIA/44/2019), *'If application of the first two stages has not resulted in disclosure, a public authority should go on to consider*

¹² The complainant's legal representative wrote to the Council on 20 September 2021 challenging its refusal of a number of specific requests on the basis that they were vexatious. The letter also argued that the Council was victimising him under section 27 of the Equality Act 2010 by refusing these requests on that basis because it was failing to take account of his protected characteristics under that legislation.

the presumption in favour of disclosure... and *'the presumption serves two purposes: (1) to provide the default position in the event that the interests are equally balanced and (2) to inform any decision that may be taken under the regulations'* (paragraph 19).

78. As the Commissioner's guidance on this exception explains, many of the issues relevant to the public interest test will have already been considered when deciding if this exception is engaged. This is because engaging the exception includes some consideration of the proportionality and value of the request. For the reasons set out above, the Commissioner accepts that there is arguably some value in the Council disclosing information concerning LTNs and related matters in order to inform residents and assist with those who wish to respond to the Fox Lane LTN consultation.
79. However, following on from the reasons set out above, in the Commissioner's view such an interest is significantly outweighed by the public interest in maintaining the exception, even taking into account the presumption in favour of disclosure, given the significant burden complying with the outstanding requests would place on the Council. In reaching this decision the Commissioner has also taken into account the fact that the Council has proactively disclosed information about the Fox Lane LTN and also responded to the complainant's initial requests on this subject.
80. The Commissioner is therefore satisfied that the Council can rely on regulation 12(4)(b) to refuse to answer all of the outstanding requests listed in the annex.

Complaint iii)

81. As the Commissioner has determined that the outstanding requests should be considered under the EIR rather than under FOIA, the Council cannot rely on the provision of section 17(6) of FOIA.
82. The EIR does not contain a similar provision. This means that for any request which a public authority receives which it wishes to refuse on the basis of regulation 12(4)(b) it must issue a refusal notice.
83. Technically, in light of the Commissioner's decision in relation to the applicable legislation of the outstanding requests, the Council should have issued a refusal notice for each request citing regulation 12(4)(b).
84. In the Commissioner's view, given her findings there is no value in the Council issuing such refusal notices at this stage and therefore this notice does not include a step requiring such action.
85. However, the Commissioner notes that if the Council receives any further requests from the complainant which fall to be considered under

Reference: IC-83251-B5G2



the EIR and to which an exception applies, then it will need to issue such a refusal notice.

Right of appeal

86. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0203 936 8963
Fax: 0870 739 5836
Email: grc@justice.gov.uk
Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

87. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.

88. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Jonathan Slee
Senior Case Officer
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Annex - List of requests submitted to Council by complainant

Date of request	Council reference	Email title and subject	Request details	Date response sent
18/12/2020	CRM FOI 9086	Formal complaint on the health of our community (LTN's)	<p>In your capacity as Director of public Health for Enfield, can you please answer the following for both fox lane and Bowes LTNs:</p> <ol style="list-style-type: none"> 1. What pollution levels were recorded from the LTN boundary roads prior to implementation? 2. Please can you make those recorded levels available 3. What pollution levels have been recorded throughout since the implantation? 4. What trend is occurring since the LTN implantation? 5. What is deemed as safe levels of emissions? 6. Where do the current LTN boundary roads stand in relation to what is deemed safe levels of emissions? <p>Finally, as we know Edmonton goes live on Monday 21st and Connaught is following soon, what efforts have been made to record the pollution levels currently while prior to the implementation?</p> <p>And what efforts will be made to record the change after the come into effect?</p>	20/01/2021
21/12/2020	CRM FOI 9056	Blue Badge	<ol style="list-style-type: none"> 1. As residents within LBE have to apply to you directly for Blue Badges, you will have the total number of those people within our 	21/01/2021



		<p>Holders input to LTNs</p>	<p>Borough. How many Blue Badge Holders (BB) are there as of today's date?</p> <p>2. How many of those BB holders have been directly contacted by LBE with notification of the LTNs and their installations across the borough?</p> <p>3. What date were BB holders contacted and in what format?</p> <p>4. How many BB holders have engaged with and completed a submission in the lets talk surveys as of today's date?</p>	
06/01/2021	CRM FOI 9122	<p>20 working days for missing information on lets talk (LTN's)</p>	<p>Attached is the guide from TfL on how to display feedback. As you are the project manager of the healthy streets, I would prefer if you refrain from continually guiding me back to the "healthy streets" team. It is you, the leader of this project that I solely wish to communicate with.</p> <p>Ealing and Kentish Town both have clear heat maps.</p> <ul style="list-style-type: none"> - you have responded to a resident to say this hasn't been chosen by you at Enfield. - why? And where is the transparency on what you are accumulating? - are TfL aware that you are concealing a heat map in disregard to the format they have stipulated? <p>As the "lets talk" is ongoing and you are yet to share any update on this, please class this email as an FOI whereby you have 20</p>	04/02/2021



			<p>working days to fulfill this request:</p> <ul style="list-style-type: none"> - what are the total numbers received in lets talk of: <ol style="list-style-type: none"> 1. Negative feedback 2. Neutral feedback 3. Positive feedback <p>You have received so far for Connaught, Fox Lane and Bowes?</p> <p>How is the feedback being graded where free text is permitted for qualitative feedback?</p> <p>How were those not digitally activated included in your "consultation"? How many of those have had their concerns recorded and heard by you?</p> <p>Can you also advise why Edmonton is missing from the "let's talk" site.. do Edmonton residents not get to take the survey on the implementations already enforced in their neighbourhood?</p>	
07/01/2021	CRM FOI 9126	Richard Eason emergency active Covid travel Tranche 1&2 applications (LTN's)	<p>The public need to know what was applied for by Richard Eason on behalf of Enfield Council when submitting the applications to TFL/DFT for Emergency Active Travel Funds both Tranche 1 and Tranche 2.</p> <p>As both have now been awarded, the applications are proven to exist and need to be shared with those in the borough who must understand the full basis of the application and what specific details were highlighted to TfL / DFT as part of that process specifically for the Enfield Borough healthy streets, quieter</p>	04/02/2021



			neighbourhoods/ low traffic neighbourhoods. Both full application forms and any appendix to each of those must be released in full to residents of Wnfield Borough.	
07/01/2021	CRM FOI 9125	ENFIELD LTN PCN - refunds (you can't prove contraventions occurred)	<p>On 4th October you took images of our vehicle and sent a PCN shortly after demanding £65.</p> <p>The evidence you supplied shows no signs that are facing the driver, only signs that face the camera which are on the reverse of a planter. Unless residents in Enfield have X ray vision, it is impossible to see any signs nor a contravention occur.</p> <p>I appealed directly to you LBE. LBE refused the appeal. This case (ref 2200515792 with LT) then proceeded to the London Tribunals (LT) and they too agree with my grounds and have immediately instructed LBE to cancel the PCN without any further action.</p> <p>What this FOI now requests is for you to release:</p> <ol style="list-style-type: none"> 1. How many people were wrongly charged when "no contravention" had occurred as your evidence does not substantiate such a contravention? This will be every fine paid to you where the front of the car is seen driving through two planters but no signs within your evidence are shown to face the driver. 2. What is the value of those total fines only? 3. How will you be remedying those wrongful fines (which have no merit nor can they be lawfully upheld)? 	19/01/2021



			4. What will you be doing in the future to prove contraventions occurred where the camera does not show the driver can see a sign that faces both them and the camera in one frame?	
11/01/2021	CRM FOI 9145	Ian Barnes Tweet "huge vote of confidence from the gov in our LTN" - documents shared with Gov & TFL are required	<p>Can you therefore please share with the public, very promptly, what exactly was shared by Mr Barnes or Mr Eason to the gov/TfL - as a report must exist from the first phase of LTNs - which has now been confirmed by Mr Barnes to have a "huge vote of confidence" well supported by the government.</p> <p>As the trial is still underway and ETOs have not been made permanent and a feedback scheme is still underway, what exactly was shared by Barnes/Eason with the conservative government and TFL on the current trialled LTNs. The trial is not yet finite nor has any resident who submitted an objection seen any update, report or heatmap on the let's talk site (despite this being a clear guide from TfL). The responses have been concealed by LBE to date yet the responses/response to the LTNs are being formally issued to Gov and TFL without any residents knowing what is being shared nor the findings Mr Barnes & Mr Eason have compiled - this is not willingly shared to us, the residents, prior to LBE submissions to the government / public authorities and is unacceptable when they are going out securing more funding without releasing to the public the updates from our input and what full findings that have accumulated and how it singeing presented to the authorities.</p> <p>Please share the full submissions to both GOV and TFL.</p>	08/02/2021
12/01/2021	CRM FOI 9265	Where is Cllr Guney Dogan? (LTN's)	<p>In your role as Head of Place at LBE, you would expect from the clear Cabinet Portfolios 2020/2021 that you would work with Mr Barnes on various topics.</p> <p>Mr Dogan however is the Cabinet member for environment, traffic</p>	05/02/2021



			<p>and transport.</p> <p>Can you please advise why the HEALTHY STREET/LTN scheme by TFL (yes transport is in the name of that public authority) along with road closures to accommodate only cyclists and its environmental effects - would not be a responsibility in Mr Dogan's role as it is publicly listed?</p> <p>Why would a transport cabinet member not be making key decisions on traffic and transport issues and have zero engagement with the public on this matter?</p> <p>Why has this been for Mr Barnes to oversee when not clearly listed as anything within his remit?</p> <p>Please note you have 20 working days to supply this information and this email serves as an FOI for a public response.</p>	
13/01/2021	CRM FOI 9159	Changes to Palace Gardens Car Park for Blue Badge Holders	<p>This email serves as an FOI request for the following information.</p> <p>The Palace gardens website does not currently (as of today) restrict a time limit to blue badge holders.</p> <p>Gov have now sent an email regarding Enfield Palace Gardens parking saying parking for blue badge holders in now limited to 3 hours.</p> <p>Can you therefore clarify,</p> <ul style="list-style-type: none"> - who is responsible for the changes? The department, councillor and officer names please. - why have changes been made to restrict and limit the 	19/01/2021

			<p>mobility of vulnerable adults during a pandemic?</p> <ul style="list-style-type: none"> - what does this set out to achieve? - when will Enfield palace gardens website reflect the changes? - If any receives a ticket prior those changes on palace gardens site for overstaying 3 hours, will you be cancelled those tickets due to misinformed publication? <p>Images from the gov email and palace gardens site are attached</p>	
14/01/2021	CRM FOI 9166	FOI Ringwood way School street ETO & all others (LTN's)	<p>Can you please provide all documents and key decisions relating to the ETO for Ringwood way, n21 and all others in the borough.</p> <p>This must include the full orders, the key decisions (who it was made by) along with who was responsible for the physical implementation, planning and signage (or lack of).</p> <p>Please also advise where on the current school street site does it list the clear ETOs and how to object them.</p> <p>So far all that are present is a few PNG image files that show a map and nothing further.</p> <p>What consultations have been set up for these separate schemes that are not LTNs? How is that to be fed back and what tools have been set up to allow live and transparent feedback on this school street schemes here in our borough while an ETO is in place.</p>	12/03/2021

17/01/2021	CRM FOI 9190	request of author confirmation (Firs Lane)	<p>Upon reading the FAQ for Firs lane - as shown in the attached image clearly, can you please confirm who are the authors of the FAQ and who conducted and compiled the London Ambulance Service (LAS) responses?</p> <p>Please also make the response by the LAS available which was supplied by them to the LBE and LBE declares the information submitted by them in the FAQ.</p> <p>I look forward to receiving this information within 20 working days.</p>	16/02/2021
17/01/2021	CRM FOI 9189	contract and SLA's for the NSL agreement	<p>After seeing Key Decision 5063 and that NSL have been awarded an enforcement contract from sept 20 until 2026 - can you please release the full contract and service level agreements.</p> <p>In particular we wish to see the vehicle types and categories (such as registration plates, ULEZ compliance, models, fuel type, consumptions both when moving and idling, operational requirements of the cameras)</p>	17/02/2021 and 02/03/2021
17/01/2021	CRM FOI 9187	Release the full quantities surveyed from this graph (LTN's)	<p>The graph below is taken from the community engagement file published in Quieter Neighbourhoods.</p> <p>You will notice that quantities of those surveyed have nothing been included.</p> <p>Can you therefore release immediately the full quantities of those asked for feedback on each of the roads listed as without it, the graphic shows very little and between roads there may be significant difference in responses that aren't truly captured and reflected in this graph.</p> <p>Can you also please list any road where less than 15 comments</p>	18/02/2021

			<p>were received (as a separate doc)</p> <p>Please release full quantities of the responses for each road shown in the attached.</p>	
23/01/2021	CRM FOI 9221	Aarhus convention breaches - remedy immediately (LTNs')	<p>After reading through the Aarhus Convention and knowing LTNs were brought in while in the EU, of which many laws are still before enforced and enshrined in the U.K..</p> <p>(EC) No 1367/2006</p> <p>Article 4</p> <p>Collection and dissemination of environmental information</p> <p>1. Community institutions and bodies shall organise the environmental information which is relevant to their functions and which is held by them, with a view to its active and systematic dissemination to the public, in particular by means of computer telecommunication and/or electronic technology in accordance with Articles 11(1) and (2), and 12 of Regulation (EC) No 1049/2001. They shall make this environmental information progressively available in electronic databases that are easily accessible to the public through public telecommunication networks. To that end, they shall place the environmental information that they hold on databases and equip these with search aids and other forms of software designed to assist the public in locating the information they require.</p> <p>Pollution readings from Green Lanes (Bowes), green lanes (palmers green), winchmore hill road (n14), aldermans hill, Southgate green high street, Bourne hill - have not been provided</p>	23/02/2021

		<p>by you.</p> <p>You have also declared that no readings are being taken on the roads names above.</p> <p>Where are the public links to this information?</p> <p>Is pollution data as such relevant to your functions as the rollout of a pollution causing scheme that is currently unmonitored on the most impacted roads?</p> <p>What search aids exists to assist the public in LBE to locate such data?</p> <p>How have you considered the increased use of these roads when coming to determine that other roads are more favourable to be kept "low traffic" when you aren't sharing any data show the affects on the specific affected roads?</p> <p>Why is pollution data missing?</p> <p>Please note that unless a response is received by Tuesday 26th January at the very latest a full infringement case will be filed with the EU for investigation and it will be submitted from multiple residents here in LBE.</p> <p>We know that Wood Green end of Green Lanes (haringey) is seeing double the amount of acceptable pollution and yet you have failed to monitor any such levels on that same road but at the other end which falls into your responsibility at London borough of Enfield.</p> <p>I await a full list of pollution level readings from before LTNs, and now during their trial. This is missing from the FOI which you have</p>	
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			<p>sent through and is unacceptable.</p> <p>You have also failed to consult the public and have rushed through a scheme without the full consultation of the residents here. You will note the clear guidance in the Aarhus Convention which you are clearly in breach of.</p> <p>Please address:</p> <p>Aarhus Convention</p> <p>Equalities act and the 10,520 blue badge holders in our borough who you have not at all contacted by you and you have confirmed in writing that no equality impact assessment has yet been conducted (as confirmed in FOI this week from LBE re BB holders)</p> <p>EU human rights</p> <p>-in your reply please state clearly how you believe you have not infringed any of it.</p> <p>Any missing information or lack of response from you will be highlighted to the EU with immediate effect for its obvious infringements of the Aarhus convention.</p>	
03/02/2021	CRM FOI 9321	Update on LBE vehicle fleet size & fuel types	<p>On 19th October you provided FOI 8591 which showed at that current time the number of vehicles on the LBE fleet and what fuel type they used.</p> <p>Can you please now provide an up to date response for this same question to be answered accurately as at the specific date you reply.</p>	17/02/2021



			In addition to this - can you also please specify how many vehicles LBE have access to which are not deemed as LBE's own fleet but are used to conduct the operations of LBE.	
04/02/2021	CRM FOI 9307	Tranche 2 form completed by Richard Eason (LTN's) (SPOC reminded sent with ack)	<p>This is again a further FOI request that needs to be completed by you as you are responsible for the filing in and submission of the form in question.</p> <p>You state in tranche 2 application for active travel funding that:</p> <ol style="list-style-type: none"> 1. You have the "full political support" - can you please be clear as to what the full council stated. It would appear this is highly inaccurate as 1/3 councillors clearly voted against this and the conservative cllrs brought about their opposition business on 28th January to oppose those LTNs. Where is the "full" support - please evidence this in your reply. 2. You state under "impact on protected groups" that there is "none". It is stated in FOI 9056 that 0 out of the 10,520 Blue badge holders have been contacted. Furthermore, that anyone over 65+ Outside of LTNs have been contacted as the FOO confirms nobody outside an LTN has been communicated with. How are you so sure there is NO impact to these protected groups? Please evidence this in your reply. 3. Mary Maguire states in January during a talk with over 50s that there is a £1.3million saving on freedom passes this year versus last. <ol style="list-style-type: none"> A) What have you done to ensure 1.3m worth of travel can now be enabled and totally unhindered in their personal vehicles to have any quality of life both inside and around the LTNs knowing that 	17/02/2021



			<p>alternative modes of transport are not an option?</p> <p>These people, now most likely to need safeguarding and shielding rely on cars of family, friends, neighbours, carers and anyone in their bubble.</p> <p>B) How have you considered them while knowing from Mary Maguire that they are not expected to travel on public transport this year?</p> <p>C) Would you expect all over 65s to ride a bike?</p> <p>4) Cyclist are the sole road users given priority at this time under you application and the decision making of Ian Barnes, and lack of regard from Alev the cabinet member for "older people".</p> <p>A) How much contribution to the decision making that affects "older people", people with "mental health" problems and "carers" had Alev had on this scheme?</p> <p>B) what analysis has been made by this Alev to inform your decisions to not protect the most vulnerable in our society (and as mr Barnes states to encourage everyone out of the cars during a pandemic)?</p>	
05/02/2021	CRM FOI 9695	DATA AND DEMOCRATIC RIGHTS DENIED TO THE PUBLIC	Can you now please supply a full back end report of how much traffic is attempting to access any link under the petitions category who have failed to access what they need? This should go back to September and up until the date you respond.	11/05/2021



<p>28/02/2021</p>	<p>CRM FOI 9444</p>	<p>Cycle Hubs</p>	<p>Could you please release the costs for:</p> <p>The cycle hubs (not the hangars) which are at Enfield town and at Edmonton.</p> <p>Can you share the total costs for all stages of the implantation:</p> <ul style="list-style-type: none"> - design - planning - hub cost <p>Furthermore, can you please state how many spaces for bikes each have and what the current usage (capacity) is for both on a daily, weekly and then monthly basis.</p>	<p>26/03/2021</p>
<p>05/03/2021</p>	<p>CRM FOI 9474</p>	<p>PCNS</p>	<p>Could you please send through the current totals for present data - in the same format as the attached data covering total PCNs, % issued with an LBE postcode, the total appeals and breakdown by month.</p> <p>Please ensure that any comment on current date clearly states 2021 and not 2020 (as was the case with the previous one displayed in attached image).</p> <p>Can you also please ensure that Cannon Road School street closure PCNs, Palmerston road PCNs and the PCNs from park road Edmonton are included dating back to their first date of enforcement.</p> <p>In addition to the above can you please state how many PCNs were challenged initially directly to LBE and were refused by LBE but</p>	<p>16/03/2021</p>

			later went on to have their PCN cancelled at the instruction of the adjudicator. How many of those examples exist?	
05/03/2021	CRM FOI 9477	Datix reports on LTN and cycle lanes (LTNs)	<p>LBE,</p> <p>Can you please supply the Datix incident reports sent to LBE by london ambulance service (LAS) - within 20 working days.</p> <p>The LAS have confirmed they have supplied reports to you (in writing). Please make those available in full as soon as possible.</p>	31/03/2021
06/03/2021	CRM FOI 9488	foi- Favoured physically abled locals over disabled	<p>Dear Enfield Council,</p> <p>I am requesting for you to supply the data you used to determine the suitability of fox lane and Bowes ltns in areas which TFL data has clearly highlighted as the "least equitable" areas for the LTN schemes across all london districts. Both schemes are also in areas with no step free access.</p> <p>Can you please advise:</p> <ol style="list-style-type: none"> 1. What you hope to achieve by implementing LTNs in the wealthiest (least deprived) areas of the borough? 2. What extra active travel/fitness activities you hope to see in fox lane which already has 2 parks to the north and south of the scheme? 3. How you have considered that Southgate, Arnos, Palmers Green and Winchmore Hill do not have any step free access into central london year have made the boundary roads more congested for those who are less able to take up active travel? 	31/03/2021



			<p>4. Where TFL data clearly shows the most deprivation is in the east of the borough why were no LTNs installed there as a matter of priority over other less equatable areas on the south west of the borough?</p> <p>5. Why have LBE not utilised LTNs in Edmonton green where there is step free access to the train into central?</p> <p>6. Regarding brownlow road bus gate, this will prevent local Bowes residents from using private vehicles/taxis to go to harringay (their nearest step free station). This will mean locals will now need to go back out to Oakwood to then come back into central. How are schemes for LTNs being funded for those who already have the ability to travel as they wish, completely unhindered, where other protected groups such as the elderly and disabled who cannot manage stairs, still cannot use their local public transport stations due to the lack of step free access?</p> <p>7. Why are more decisions and costs being made/spent on those who already have far more mobility, over those who have far less?</p> <p>You make the decision, so you have the data you acted upon. You cannot state you do not hold this information, as if you do, you are declaring that no effective/suitable consideration has been made in the decision making process.</p>	
06/03/2021	CRM FOI 9489	456 bus route-WH Green/Church Hill (LTNs)	<p>Dear LBE,</p> <p>The new bus route 456 from Enfield to north mid hospital shows that the route it will take is along church hill and passed winchmore hill station.</p> <p>Please can you answer the following:</p> <p>1. The width of church hill is incredible narrow and at times has</p>	06/04/2021



			<p>bends in the road which cars find challenging to navigate through. How do you expect a wide bus to manage this road?</p> <p>2. Winchmore hill green slip road to the left of the green is closed. This means the bus will need to turn left directly after the green and the junction is not suitable for this. How would you expect a bus to safely turn here?</p> <p>3. The road by the green that the bus will need to turn into is usually congested, narrow and has limited space for cars, how would you expect a bus to utilise this lack of space effectively?</p> <p>4. Lastly, Mr Ian Barnes states for fox lane LTN roads that they are not designed for cars and that he wants to return these cars to their correct place, main roads. Can you please therefore answer, what is the specially prepared surface on the roads within the LTNs? Why is it prepared with such a specific surface? Who is this surface specific deigned to carry?</p> <p>5. If roads with specially prepared surfaces for cars are being flagged as not suitable for cars, why would more narrow roads (elsewhere in winchmore ward) with sharp left hand turns be suitable for much larger, heavier vehicles, such as this new bus route?</p> <p>6. Why would this bus be suitable for a "rat run" route across the narrow roads of winchmore hill green?</p>	
08/03/2021	CRM FOI 9486	Why apply NL model here in	<p>More simply please advise: - if the mortality rate data has been considered by you prior to any</p>	20/05/21

		<p>U.K?</p>	<p>mini Holland/active travel scheme implementations?</p> <p>On Mon, 8 Mar 2021 at 08:33 [the complainant] wrote: FAO SCary, IBarnes & NCaliskan,</p> <p>I understand all this change to active travel and the mini Holland model is being applied to the U.K. as if it is best in class.</p> <p>Can you therefore please advise why you are using the Netherlands model in the U.K. based on the below mortality rate comparison between U.K. and NL. While also noting that the U.K. is 4 times larger than the NL.</p> <p>2019- 18 🚲 killed by 🚗 UK. 77 🚲 killed by 🚗 NL</p> <p>9.57 🚲 killed by other 🚲 in NL every year (avg '13-'19) 0.71 🚲 killed by other 🚲 in U.K. every year (avg '13-'19)</p> <p>15.71 🚲 killed by 🚗 U.K. avg ('13-'19) 77.71 🚲 killed by 🚗 NL avg ('13-'19)</p> <p>Total Ped&Cyclist killed by car UKvNL 2013-2019</p> <p>774 U.K = 110.57 annual average pedestrian and cycling deaths by car</p> <p>788 NL = 112.57 annual average pedestrian and cycling deaths by</p>	
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			<p>car</p> <p>Attachments from ONS and CBS.nl for the mortality rates 2013-2019 (within this email)</p> <p>I therefore wish to know:</p> <ol style="list-style-type: none"> 1. Why are you applying this model to the U.K. where our population is higher and there are less deaths? 2. Why are you applying a NL model to the U.K. where the rate of death is higher in NL? 3. Are you hoping to kill more people in the process of applying the NL model to the U.K.? 4. Would you not agree that is the NL that should be applying a mini U.K. model and not the other way around? 5. Can you please supply your full commentary on this data to be supplied to the press. 	
11/03/2021	CRM FOI 9840	Independent Consultant s - FOI request (LTNs)	<p>Complaints at LBE,</p> <p>Mr Eason stated in the environment scrutiny meeting last night that there were 2 sets of independent consultants for the LTNs:</p> <ol style="list-style-type: none"> 1 for the data engagement 1 for the air quality and noise monitoring <p>Can you please therefore release:</p> <ol style="list-style-type: none"> 1. Who are these consultants? 2. When did they start their work on this? 3. what is the total costs for their services? Both the final total and daily rate. 4. How long are they expected to work on this? 5. Why has this not been budgeted for in either of the tranche 1 	28/05/2021



11/03/2021	CRM FOI 9843	REQ for Info-Environment Scrutiny	<p>and 2 submissions?</p> <p>Dear Complaints and Info,</p> <p>I was watching and have a copy of the communications for the entire duration of the Environment scrutiny last night which covered the LTNs in detail.</p> <p>What is very concerning is that within FOIs you have stated:</p> <ul style="list-style-type: none"> - Blue badge holders cannot be contacted. - that blue badge holders who filled in lets talk could not be identified by you at LBE - that there is a data issue to contacting bb holders - that there is no allocated funding to conduct an equality assessment. <p>All of this has been confirmed by you in writing.</p> <p>Can you please therefore explain:</p> <ol style="list-style-type: none"> 1. Why was it declared last night that Blue badge holders have been contacted? You also state this in the 4th March update on lets talk. Can you prove how this has effectively been executed and ensure that no BB holder has been left out? 2. What % of blue badge holders have been contacted and what is their proximity to the scheme? 3. In the announcement on lets talk from 4th March it clearly states "we have contacted blue badge holders directly". How have you done so with regard to data protection and in which format?I have you "contacted" them? 4. Why, as I personally live in a blue badge holder household has 	28/05/21
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		<p>no such communication been received?</p> <p>5. You state you will contact those who have identified as having a disability in the lets talk, however that limits the feedback to those who are already aware of lets talk and doesn't reach those not yet engaged nor aware. What efforts have been made to contact every blue badge holder? Can you please also share the disclaimer and privacy agreement to the lets talk that enables you to make contact and use the data provided for this purpose?</p> <p>6. What efforts have been made to contact those with mental illness?</p> <p>7. What efforts have been made to contact those over 65 who are considered elderly but do not identify as having a disability?</p> <p>8. What efforts have been made to contact the vulnerable in our society, such as those who have been assaulted and must ride in their own safe, lockable personal vehicle for their own safety and mental health?</p> <p>9. What efforts have been made to capture the feedback from carers (both paid and unpaid) along with social workers who are the key workers of our community and their duties?</p> <p>10. Separately, Ms Caliskan states the LTN is a political commitment, so is there any point in a consultation when the outcome is clearly predetermined by the political commitment over the commitment to the people of Enfield?</p> <p>11. How does a borough expect to encourage active travel and claim to be green when they have made an active decision for a</p>	
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		<p>drive in cinema (a destination and reason to get people behind the wheel and driving)?</p> <p>13. Ms Caliskan mentioned equality many times through her numerous speeches. Where is the equality when only those on residential side roads can effectively have an LTN, when those living on a main road will never be able to have an LTN of their own. How is this equality?</p> <p>14. Ms Caliskan states air quality and improvement to quality of life for those in the LTN. Do the top 50% of least deprived in our borough need further improvements to quality of life? Or is it the least deprived 50% of our area that should be receiving a scheme that improves quality of life?</p> <p>15. Why have no LTNs been implemented near a step free access station making the links for the disability far better and accessible? The only step free station is Edmonton green and Oakwood. Why were no LTNs implanted near those? But instead near stations that have no access.</p> <p>16. The purpose of the LTN has changed. We have been told throughout that traffic will evaporate. Now we are told traffic belongs on main roads and will inevitably increase. Under what regard for the original and then varied ETO (Nov) and the road traffic act do LBE believe they can change the purpose of the LTN under the same original and modified ETO?</p> <p>17. Haringey have a clear heat map showing the responses to their LTNs. Southgate for LBE has a let's talk with this same functionality. Fox lane and Bowes LTN lets talk however does not have a clear heat map. Why are you concealing the responses and</p>	
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			<p>awaiting the publishing of a report before you release these to the public? Could this not be in real time?</p> <p>18. The slides of Mr Eason state that ward forums have been occurring. Can you please confirm the last dates for any ward forums held for: Southgate Green and Palmers Green wards? How many occurred in the passes year and when?</p> <p>19. Ms Caliskan stated in the meeting last night that the PCNs from the LTNs are not designed to generated money and that the council has far more effective ways to generate income. Can you please advise what initiates these are? Why they are not in place? And why the council is in so much debt if what Ms Caliskan states has any truth.. where is the money generated from these multiple ways to generate revenue - as she stated?</p>	
14/03/2021	CRM FOI 9583	6 month Engageme nt report due April 13th	<p>After reviewing annex E1 paragraph 4 attached to the tranche 2 funding, the council is required to submit a report on the engagement data 6 months after it opens.</p> <p>October 14th is the published date for Fox Lane when the consultation opened for the "trial" and as such, the report is due 6 months later by April 13th.</p> <p>Under the clear legislation of the Aarhus Convention, the local authority is required to publicly release any such data and report that relates to the changes of our environment. Specifically that air quality is so heavily relied on by the council regarding LTNs, there is no exemption to this requirement.</p> <p>Please respond with the date this report will be made publicly available.</p>	14/04/2021

14/03/2021	CRM FOI 9665	Data about LBE serving councillors	<p>How many LBE councillors (while specifying the % mix by political party):</p> <ol style="list-style-type: none"> 1. Have a registered physical disability 2. Have a registered mental disability 3. Are paid carers 4. Are over 65+ 5. Have made and received payment on an LBE expense claim for any car, mileage and/or petrol related cost at any point since 2018 elections? 6. What is the total value of those expense claims dating back to the 2018 elections? 7. What is the % mix by party relating to q6? <p>The responses should clearly state the total number of councillors for each of the above - along with the % mix by party for each and every answer.</p>	25/05/2021
14/03/2021	CRM FOI 9664	all correspondence re LTNs	<ol style="list-style-type: none"> 1. Please provide all correspondence and emails between LBE officers/councillors and these groups: Better Streets for Enfield (BSFE) London Cycling Campaign (LCC) Regarding the fox lane LTN And surrounding roads. 2. All correspondence between LBE Councillors/ Officers and the MET police, London Fire Brigade, Ambulance service. The correspondence must be specific for fox lane only. 3. Minutes of the meetings held for all cycle Enfield meetings 4. Minutes of all meetings that have taken place with BSFE and again for LCC 	02/07/2021



			<p>5. Who are the different project managers at LBE for: Fox lane, Bowes, Connaught?</p> <p>6. Please release all correspondence between LBE and Gordon Sheppard at TfL</p> <p>7. Please release all correspondence reading the terms and conditions of tranche 1 & 2 funding. The full t&c's stipulated by Dft / TfL for both fox lane and Bowes are required</p> <p>8. Please provide the total number of MEQ's filed in relation to LTNs for all schemes in the borough.</p> <p>9. Design plans for fox lane. All correspondence relating to these designs. The named people, teams and companies responsible for them.</p> <p>10. All correspondence between LBE and Sure Care, (home health carer services based Enfield EN1).</p> <p>11. All correspondence between LBE and Enfield Disability Action (http://e-d-a.org.uk) I look forward to receiving the responses in full within 20 working days.</p>	
14/03/2021	CRM FOI 9581	One.Model data, traffic data and LIP funding	<p>1. Can you there release this data confirmed to exist - immediately.</p> <p>2. In the very last row, it states that further data collection will enable the impacts to be measured both inside and outside the LTNs.</p>	28/03/2021

			<p>A) can you therefore advise how this will be collected?</p> <p>B) when you will be collecting this data?</p> <p>C) why no such data exists yet despite the scheme running for 6 months</p> <p>Regarding the Tranche 2 summary tab</p> <p>3. please supply the actual totals for each item and category listed that was approved and issued to Enfield. The current totals shown are a bid. Please show the full breakdown of actual sums paid to and received by LBE in relation to each every item listed out of the total £1.8m that was originally sought.</p> <p>4. It is confirmed by LBE that LIP funding was used for fox lane prior to the bid being awarded. What is the total sum of LIP funding that was used?</p> <p>5. How was the LIP funding used in and around the fox lane LTN?"</p>	
15/03/2021	CRM FOI 9589	PCN appeals	<p>"This email requests the release of information confirmed to be recorded by the authority. Please supply this data within 20 working days.</p> <p>After appeal 2200515792 was submitted to the adjudicator, LBE received the notice of appeal (noa).</p> <p>1. Please confirm the date this noa communication was issued to you by the adjudicator.</p> <p>2. Did you record the particulars of the NoA, specifically the PCN number subject to appeal, hearing date, grounds for appeal</p>	08/04/2021



			<p>and the deadline for receipt of documents and evidence?</p> <p>3. Did you receive a warning notification on the IT system advising you of the deadline to submit your documents and information?</p> <p>4. If not, why?</p> <p>5. Upon receipt of an appeal the authority will decide whether or not it should be contested. The decisions on whether to contest or not is recorded by the IT system user. Please share this recorded data in full</p> <p>6. What are the totals (since LTN implementation to today's date) for decisions on whether to contest the appeal or not?</p> <p>7. How many appeals were contested and succeeded at the tribunal in favour of the appellant?</p> <p>8. How many appeals were contested but were refused at the tribunal in favour of the authority?"</p>	
17/03/2021	CRM FOI 9513	Further information required on NSL/Marston Holdings	<p>Complaints and info,</p> <p>This email serves a FOI request for the release of the following information:</p> <ol style="list-style-type: none"> 1. What specific cctv equipment/technology does LBE use as part of the NSL agreement? 2. What capabilities does the technology have? 3. Are there any additional capabilities of the technology other than simply issuing PCNs? 4. Does the technology allow LBE to capture any data? If so, what 	16/04/2021



			<p>data can captured by this technology?</p> <p>5. What data has been obtained by NSL or LBE through any technology referred to above? If any, please release all in full.</p> <p>6. What personal devices do the Civil Enforcement Officers use both inside and Outside of the enforcement vehicle?</p> <p>7. To release all correspondence between LBE and NSL relating to full contract</p> <p>8. To release all reporting data on the NSL fleet in LBE regarding its emissions.</p>	
18/03/2021	CRM FOI 9587	Cycle counts - every individual count (time & date)	<p>LBE are monitoring cycle counts along green lanes, however the totals are only shared with the public as a total.</p> <p>For trackers to work, they have to clearly and accurately identify and store each individual occurrence. Without that, there is no account or evidence to support the totals.</p> <p>1. Please therefore immediately release all of the cycle count data - dating back to the cycle lane implementation to today's date - clearly showing each and every individual cycle count that has been included. This must show the specific date and time that each bike was counted and where this occurred for all of the monitors.</p>	14/04/2021
18/03/2021	CRM FOI 9585	Diffusion tube Devonshire & traffic data	<p>1. The air quality diffusion tube on Devonshire/aldermans - how often are the filters changed and on which specific dates has this been done since LTN implementation?</p> <p>2. Please specify the percentage of accuracy from this tube?</p> <p>Re Traffic volume data you state in previous FOIs that traffic data IS being collected during the trial.</p> <p>3. Please release this data, state how it is being captured along with where those traffic monitors are.</p>	16/04/2021

			<p>4. Please share all data that LBE have for measuring and monitoring the “dwell time in traffic” on the boundary roads of LTNs</p> <p>5. If none is held, why is this not being monitored? And when do LBE plan to monitor this?</p>	
<p>Council sends letter to complainant on 23 March 2021 explaining that no further requests concerning LTNs will be responded to on the basis of section 14(1) of FOIA.</p>				
14/04/2021	Reference not allocated	Request for EQIA fox lane & Connaught	<p>1) the Bowes EQIA is listed below and attached as PDF. This was commenced on 1st July, one month prior to Bowes traffic order commencement. Please can you release this equivalent document done for both Fox lane LTN and Connaught Gardens scheme?</p> <p>2) please can you make those documents available in both a) it’s original format (word) along with any modified format such as (pdf). Both formats are required.</p> <p>3) please can you also share the original version of the attached pdf for Bowes, in its original word format.</p>	Council considered it to be vexatious – not responded to.
27/04/2021	Reference not allocated	Devonshire Road modifications	<p>Could you please advise where the traffic orders are for the works that have already taken place here in Devonshire road? (See attached images).</p> <p>Can you please advise what scheme/project this is for?</p> <p>Can you also please confirm if changes to roads are permitted during an ETO without including the modification on a new traffic</p>	Council considered it to be vexatious – not responded to.



			order? Can you please advise if the works were advertised anywhere?	
02/05/2021	CRM FOI 9779	Dual purpose Waste & Recycling bins	<p>1. A) How many of these specific bins currently exist on pedestrian accessible routes in Enfield?</p> <p>1. B) Where are they located?</p> <p>2. Are there any bins on pedestrian accessible routes that are not specifically the same as this design shown in the image, but allow for dual purpose general waste and recycling waste simultaneously?</p> <p>3. If none exists for either q1A or q2 - can you please share the assessment made by LBE as to why no dual purpose general waste and recycling bins need to be installed on pedestrian accessible routes?</p>	02/06/2021
02/05/2021	CRM FOI 9894	CCTV LBE response to B MP	<p>"Complaints, Regarding your response to Bambos MP regarding my request for CCTV, can you please advise under the FOIA:</p> <p>1. The grange ward locations for CCTV - can you please share the installation dates and locations?</p>	04/06/21



		<p>2. For each of the locations where cctv installed, can you please share the total number of complaints, crime reports or any other matter that was formed as part of the assessment to install CCTV at these locations?</p> <p>3. Can you please share any document that relates to the installation of these cctv cameras</p> <p>4. Can you please state any other grange award locations which were assessed prior to CCTV installation?</p> <p>5. Can you please release the costs for the 4 camera that were installed (for installation, maintenance and operating costs)?</p> <p>6. Can you please state the sole purpose they were installed and if different forms each, what are those?</p> <p>7. Since installing the cameras, on how many instances has they assisted with a crime report?</p> <p>8. How many of those instances in q7 resulted in a conviction?"</p>	
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03/05/21	Reference not allocated	Written requests for letters TG52/1451 & TG52/1454	<p>On page 3 of the fox lane traffic orders for TG52/1451 it states at paragraph 5 That under the Local Government Access to information Act 1985 that upon written request (which this email serves as), that i, a member of public am entitled to the copies of letters issued to you in response to the order.</p> <p>Can you please therefore make available to me, all letters that relate to TG52/1451.</p> <p>On page 3 of the Bowes traffic orders TG52/1454 it states at paragraph 7 That under the Local Government Access to information Act 1985 that upon written request (which this email serves as), that i, a member of public am entitled to the copies of letters issued to you in response to the order.</p> <p>Can you please therefore make available to me, all letters that relate to TG52/1454.</p>	Council considered it to be vexatious – not responded to.
03/05/2021	Reference not allocated	Public Health Environmental Pollution CRISIS (responses required within 14days)	<p>I am deeply distressed and saddened to see now a significant and well known figure, Rosamund Kissi-Debrah the mother of the poor Ella Roberta who developed asthma from abysmal air quality and latterly died (Ella lived just 25 metres from the south circular), has now had to express the severity of her own lived through experience of losing a daughter from such negligence to call out Richard Eason (the “brains” behind UNhealthy streets with no previous public health nor environment expertise) to deliver this plan alongside a film director (Ian Barnes key decision maker) in total disregard to public health and environment (please see image attached and thjs video she comments on</p> <p>https://twitter.com/ediz1975/status/1388914548292399107?s=21)</p>	Council considered it to be vexatious – not responded to.



		<p>I ask, where have you both been since July 31st?</p> <p>On 16th December 2020 the London Inner South Coroner Court concludes its inquest led by Corona Philip Barlow and found that air quality was a contributor to the unjust death of an innocent little girl.</p> <p>Here in Enfield, The key decision maker of the AQ quality damaging schemes, High Traffic Neighbourhoods, Inequality Promoting neighbourhoods, Bambos MPs private gated community - as those living directly in and around them know the better as, now purposely faced with increased pollution without any monitoring occurring - as the sole focus announced by the "healthy streets" team is on a digital model that uses predated traffic measurements to simulate a pollution level outcome. Furthermore, that healthy streets have confirmed that no traffic readings have been taken at any point during the "trial" as they are waiting for traffic to return to "more normal" levels before capturing that data.</p> <p>The key decision maker is responding on social media to the outcry and complaints clearly stating the pollution increase caused by purposeful idling cars, children coughing and worsening mental health/distressed state which is evident in all videos and from the majority of the community desperately pleading for intervention from the local authority.</p> <p>Please can you both separately respond directly to each of my points within 2 weeks from today.</p> <ul style="list-style-type: none"> • So far no site visits from either of you in your roles. Can you please advise why? • Has Cllr Ian Barnes yet informed of the real and immediate 	
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			<p>threat to life for either of you to investigate and protect those within your jurisdiction?</p> <ul style="list-style-type: none">• you are both the experts here and you are relying on a former RAF training officer who transitioned to become a business owner in bicycle mechanics/cycling tuition combined with a media production director (who is the Key decision Maker of KD 5023) to advise what is acceptable for our wider public. What correspondence have you had with Richard Eason "Healthy" Streets and Ian Barnes Deputy council Leader specifically in your designated capacities on the matters raised here?• Can you please advise why no recent annual AQ report has been published where other london boroughs are easily located for the most recent years?• Within the AQ report it clearly states that complaints about AQ will be promptly dealt with. How do you intend to investigate and deal with actual complaints by not communicating with the complainers and using a model based process with predated traffic data?• There are 3 pollution monitors in and around a small LTN area in Bowes of approx 1.1km x 0.65km with just 3 modal filters - whereas the enormous LTN with 11 modal filters that covers 9.6km of total internal LTN roads - has just one AQ monitor which is not a live/real time monitor which is conveniently placed at the end of the Enfield Southgate MP's road. Will this one monitor pick up any readings for: The Bourne, Green Lanes, High street Southgate, hedge lane, winchmore hill road, broomfield lane, powys lane, waterfall road?• Re the above question, how do you expect to confirm the	
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		<p>purpose of the traffic order to improve air quality (within LTN) without a pollution monitor inside it?</p> <ul style="list-style-type: none"> • The AQ monitor at the end of Devonshire road is rather high above the ground. Certainly taller than any human. Would this be taking any such readings that are as adjacent or reflective of the height to that of a small child who's airways are closer to the exhaust pipes of cars queuing in Ian Barnes purposeful idling queues? • The public call on you both in your capacity and with your expertise and qualifications to execute your duties and ensure the levels of air pollution in all the main roads currently effected by excess congestion from the purposeful displacement of cars that could previously move freely through all roads (allow pollution to disperse fairly across a wider area) versus now being more concentrated on a handful of main roads. Vehicles are now being forced to idle simply because Key decision Ian Barnes who has no medical expertise or air quality surveillance credentials believes that, (I quote him) "I'm also told that the schemes push cars onto main roads, well that's exactly the point of LTNs, sending dangerous through traffic back to it's proper place" - as stated at the LBE Full Council Meeting 28th Jan 2021 Item 6 Opposition business (Tories and Community First), Dept Council Leader response 18mins:16seconds https://fb.watch/4ODXMIKrpI/ - please confirm you have both seen this and offer your comments. • When do you plan on dealing with these air quality complaints and ensuring pollution levels are safely beneath the maximum guidance? • What assurance can you currently give when there are no air 	
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			<p>quality monitors on most of the effected roads and none within the LTN?</p> <ul style="list-style-type: none"> • How do you intend to compare the air quality from before the LTNs to the period now where the LTNs are implemented - without any AQ readings from the roads now severely affected (many of which were not even detected as possible affected roads in the planning models prior to installation as carried out by SWECO, though road such as winchmore hill road has massively underestimated which further proves that traffic modelling is unreliable and can only go as afar as using it as a guide, rather than evidence. Let alone using these highly inaccurate computerised predictions to measure air quality - will AQ also be used for its inaccuracy)? • There is always the annual seasonal worsening of air pollution during winter months and this period when it's worse has now been missed. Are you planning to collect such data during the summer months knowing that air pollution is not as bad as it would be in the winter? <p>Aside now from air quality which of course regards both of you, I have some further questions for Mr Lines.</p> <ul style="list-style-type: none"> • what health assessments have been made prior and post LTNs? • What KPIs have you predefined to ensure that something posed to encourage "active travel" for its alleged health benefits is meeting its purpose to increase a safer, healthier community to live and travel in and around? • How are the mental health effects from this scheme at the 	
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		<p>huge distress caused to local residents being reported?</p> <ul style="list-style-type: none"> • How have you considered access for disabled people to keep safe distance where not a single pavement has been extended nor temporary pavements have been installed in and around the LTNs?... • <p>...To give you some further perspective as seemingly it is alarmingly and distressingly not on anyone’s radar at LBE:</p> <p>Bambos MP took just 377 petition signatures into parliament calling for LTNs. Those 377 represent a tiny 0.11% of our population.</p> <p>There are 52,383 disabled people in our borough which represents 15.69% of the total Enfield population.</p> <p>Who is safeguarding them and ensuring their conditions do not worsen whether relating to their physical and mental state?</p> <p>Please note your responses are required within 14 days and any failure to respond will immediately result in the submission of the full case to both DEFRA and DHSC.</p> <p>The people of Enfield want to make something very clear to you now at this stage stage, that if anyone’s health... has already or does worsen hereafter, through any direct or indirect link to these public healthy destroying, meritless, “unlawful” schemes (this unlawfulness quite courtesy of Justice Laing and her ruling against TFL street-space earlier this year), you can be sure that complaints such as these which has clearly brought the issues to your attention and to the LBE cabinets attention - where both Richard</p>	
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		<p>Eason and Ian Barnes, are evidently failing to respond and call for your expertise and intervention since the first implementation in July 2020. This will be all shared in full with the relevant and specific government departments along with their advisory and advocacy support services - to elevate the injustices we have fully documented much further. We simply want you to remedy now to keep the peace, respect our rights and uphold your obligations to your duties - rather than later when the authorities intervene and all trust between the council and residents has evaporated due to what is being perceived by many locals as utter negligence on all fronts.</p> <p>The "intro guidance to boroughs" on TfLs scheme has been quashed and yet the same guidance is still being upheld by our local authorities and the officers both of you, who have been hired for your skills and qualifications, should know better, to take immediate action, while putting in each and every safeguard to protect human health using every possible form and resource that is known to you. But as we have seen, none have been put in to practice by either you.</p> <p>You should both note that many families have sought to equip themselves with peak flow monitoring devices. They are not only recording their child/children taking 3 deep breaths (to prove how the readings were taken and that they are credibly documented), but they are also doing this morning and night. These results will be made available to you both through the formal procedures that will follow - if you continue to ignore the calls to protect our public health, our environment, our human right to life with us being threatened and ignored by the authorities we should be relying on (through the alerts with the complaints to the authorities about policy decisions that undermine/threaten someone's life or put</p>	
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			<p>lives at risk).</p> <p>I await your response with great urgency as health is top priority and cannot be delayed any further than the fair 14 days expected for an urgent reply - especially after 9 months of hearing nothing from either of you, no monitoring in place, no level of duty of care whatsoever.. at which point if still no reply nor intervention from you, alternative procedures will be immediately commenced with, including this email string clear requests from you both and various other documents published by both of you on LBE and divisional websites - which we have to hand and is in total conflict to the handling of this LTN matter for the obvious reasons stated above.</p> <p>I do wish to sign off by stating something relevant, I wish my first contact with you both was not in this regard, but sadly it has come to this because neither of you have taken action 9 months since the first went in.</p>	
04/05/2021	CRM FOI 9796 (Council considers part of request to be vexatious	streetspac e diagram and pedestrian schemes	<p>"On the "Covid street space plan" page it states the following schemes:</p> <ul style="list-style-type: none"> • Completion of the A1010 North project • Link from the A1010 South with North Middlesex Hospital and into Haringey • Implementation of 12 School Streets • Angel Walk Edmonton walking and cycling project 	01/06/2021



			<ul style="list-style-type: none"> • Bowes Primary Area Quieter Neighbourhood scheme <p>There is also an image about the streetspace scheme (as shown attached)"</p>	
10/05/2021	CRM FOI 9867	Data protection officer - parklets	<p>Dear Data Protection Officer,</p> <p>I would like to know more information about who is responsible for the Parklet site at LBE on Lets talk? Please treat this as an FOI request. However given the nature of this, I am contacting you directly as the DPO - for further comment aside from the questions below needing answers.</p> <p>In your capacity what assurances do you give the public do Enfield?</p> <p>FOI questions:</p> <ol style="list-style-type: none"> 1. Where is the site now? 2. The image as shown releases private personal data out to the public - can you please advise why? 3. What privacy policies do you have in place across: lets talk, engagementHQ and bang the table? 4. What is being done about suspected data breaches? 5. I understand an external consultant is reviewing all input from the public despite this exercise stating clearly it is used solely for internal purposes. Who is the external consultant and where does it state who's hands the data subjects private and personal information will end up in? 	02/06/2021



10/05/2021	CRM FOI 9868	Data protection officer - Google usage	<p>Dear Data Protection Officer,</p> <p>To be treated as a separate FOI request.</p> <p>Furthermore, in addition to the below can you please offer your own response in your capacity about the use of "Google translate" on your lets talk website and the Enfield council website (as shown in both attached images).</p> <p>Please also advise:</p> <ol style="list-style-type: none"> 1. Where this international service with Google is stated by Enfield Council 2. Where the public are informed of this? 3. How you have any control of the content of Enfield council information and assets of it is being given to Google? 4. Who at LBE has given consent to Google to use Enfield council specific information and information that relates to residents? 5. Are the ICO, government and local government authorities aware of your use of Google? 6. Are you aware of the statement below from Google? 7. What assurances can you offer the public regarding privacy and data handling? 	02/06/21
11/05/2021	CRM FOI 9854	Re: Response CRM COM 17205 DATA AND DEMOCRA TIC	<p>Now I have received your reply (as attached image shows from 10:25 today, stating you do not hold the information request from you in the emails below - can you please therefore advise:</p> <p>Further request for information under the FOIA in light of your response :</p>	09/06/2021



		<p>RIGHTS DENIED TO THE PUBLIC - COMPLAINTS</p>	<ul style="list-style-type: none"> - what systems are used to host and perform the the petitions area of the site - why total web hits are able to be reported on but not specific urls? - whether the digital director has confirmed this to be the case or if it is just a response from complaints without consideration to the full stack, tech scope and capabilities of the current systems -why if it cannot be monitored or is not being monitored, how is the digital team meeting their KPIs and objectives of no measurements of performance are being pursued by LBE? <p>I also have not had any update about assurances where the website is continually down.</p> <p>Nor have any such website traffic reports been supplied by you. This is therefore unsatisfactory and further cause for the ICO to investigate further (who are cc'd).</p>	
<p>13/05/2021</p>	<p>Not logged.</p>	<p>Your letter 12th May 1 week before the ETO statutory objection deadline</p>	<ol style="list-style-type: none"> 1. Can you please point me to where within the attached letter (as 2 images) you have issued to the public - where it states anything about their lawful right to object to ETO TG52/1451 by 19th May 2021 or to send those objections to traffic@enfield.gov.uk? I'm keen to see where this is stated and where you have communicated this clearly without causing confusion. 2. Can you please further advise, if that is confirmed by you in your reply as "not within the letter" - why you have decided not to inform the public of such objections that you have a duty to 	<p>Council considered it to be vexatious – not responded to.</p>

			<p>consider by law (where the survey has no legal certainty and that is all you are spending money on printed letters about)?</p> <p>3. Whonis responsible for and had made any such assessment on regulations, guidance and law prior to referring to a "survey" as a "consultation"?</p> <p>4. Regarding q3 - Please also state which other london boroughs do so in the way in which Enfield have or any assessment or guidance followed by you to determine the terminology of a "consultation" be applied to a feedback survey?</p> <p>5. A) What impacts has ever been assessed by you in relation to this choice of terminology and the overlapping inductions of the "survey" with the statutory consultation?</p> <p>B) What protected groups have been engaged in this issue to allow you to note their lack of understanding or confusion based on your choice of terminology?</p>	
13/05/2021	CRM FOI 9814	Bourne speed cameras	<p>Please can you release:</p> <ul style="list-style-type: none"> - the total number of speeding offences captured by the speed cameras at Bourne adjacent to the entrance of grovelands. The totals should be for each direction since May 2017 to present date. - the total number of speeding offences referred to above showing the monthly totals since May 2017 to present date - for both directions. -please include the speeds the drivers were recorded as exceeding. -please also include the total value of those speeding offences that have been generated since May 2017 which a monthly itemisation. 	14/05/2021

20/05/2021	No reference allocated.	Written request to make available all written letters&emails that responded to ETO TG52/1451	<p>Dear Traffic (cc complaints and information dept),</p> <p>As per page 3 of ETO TG52/1451:</p> <p>"5. Under the Local Government (Access to Information) Act 1985, any letter you write to the Council in response to this Notice may, upon written request, be made available to the press or to the public, who would be entitled to take copies of it if they so wished."</p> <p>Please hereby find this email, which serves as my written request (and for the 1.8k members of Stop Enfield LTNs who have a strong interest in this matter) to release, in full - all written responses (whether issued as an objection letter or objection email) in response to ETO TG52/1451.</p> <p>Please confirm receipt of this request and advise when each objection will be made available in full?</p>	Not responded to – Council considered it to be vexatious.
20/05/2021	CRM FOI 9869 (Parking) and separate responses as BAU	ATTACKER Obstructing access to our private property	<p>"Response below underlined</p> <p>On Thu, 20 May 2021 at 18:07 [the Council] wrote:</p> <p>Dear [complainant]</p> <p>what is the difference between CCTV and a private camera?</p> <p>PCNs can be issued by a Civil Enforcement Officer placing a Penalty Charge Notice on a vehicle</p> <p>Or by post after a vehicle is seen contravening by a Council CCTV camera (either at a location or on a vehicle), the PCN will be sent at a later date by post after we receive the vehicle owner vehicle details from the DVLA</p>	10/06/2021



		<p>We cannot issue a PCN from information received by a motorist/resident if they see a contravention</p> <p>Please provide the full detail on this and the rationale and reasoning why.</p> <p>Do you have some guidelines on this share?</p> <p>Please see the weblink in the previous email to the reasons enforcement will take place</p> <p>Yes the reasons match the reasons needed but are not being enforced.</p> <p>Do any PCNs get issued by private CCTV? If not, what about the private ones listed on LBE site?</p> <p>Please see my response above. There are no private CCTV cameras listed on the LBE site that issue PCNs. We list locations where you will find enforcement cameras here https://new.enfield.gov.uk/services/parking/cctv-enforcement/#1</p> <p>So you confirm that not a single PCN has ever been issued from private CCTV/residents evidence?</p> <p>Thanks can you please advise why in October it was refused that this was a dropped curb and we were made to pay for white line installation. Can you please refund us in that case!</p> <p>I'm afraid I do not have the details for why it was refused. The details and reasons for why you paid for a white line to be painted</p>	
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		<p>would have been detailed when you applied but it is an advisory line to help motorists and resident voluntarily comply with keeping the dropped kerb entrance clear. You will need to contact the Highways department if you no longer wish to have the lines, I would assume there would be a fee for removing it. Please contact highways@enfield.gov.uk</p> <p>No- we will not be paying anything. We, as residents sadly don't have an endless supply of income coming through in needless grants. Would also need some money back on the interim please as the service is not complete. This was paid for a while back but still incomplete the line stops randomly and doesn't have a clear line showing it where it stops. It is just one straight line. (See attached). The misinformation shared was shared with us in writing and will therefore be handled tomorrow along with your refusal as below to refund due to the misinformation.</p> <p>At present this attackers has been charge 0 - clearly the process is ineffective. What reviews are being conducted to ensure a high contravention to PCN RATIO?</p> <p>I am sorry to hear that you are having problems with individuals. We enforce restrictions when they are seen or reported. We do not issue to have a high ratio of issued PCNs.</p> <p>That is not good. How can you report on KPIs and whether the current process is effective without monitoring this data? The data is there so why has a report in this not been created?</p> <p>Again, I am sorry that you are having problems, a PCN is issued when a Civil Enforcement Officer attends and can issue to a vehicle. I will ask officers to see whether we have any other complaints other than yours and if necessary will look to see if</p>	
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		<p>anything further can be done.</p> <p>And CEOs are never here. So what is the point in dropped curb rules and white line?</p> <p>There could be contraventions of this type occurring regularly each week but if only 100 PCNs are being issued, that would allow you to say effective enforcement is taking place. That isn't complete. Please state how many contraventions of this type either white line or dropped curb and then how many of those contraventions are issued a PCN?</p> <p>We only keep records on the amount of PCNs that were issued for blocking dropped kerbs:</p> <p>2019 2804</p> <p>2020 1688</p> <p>2021 to date 609</p> <p>I am afraid I am unable to assist you further with this matter. If you wish to report the issues, you have the information to do so. Any further communications will need to go through our complaints team at complaintsandinformation@enfield.gov.uk</p> <p>So what you stated on previous email about it being "effective" is untrue when you are not measuring such PCNs against the the number of contraventions reported.</p> <p>I am therefore copying in my ward cllrs to ensure this is also on</p>	
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			their radar and will be further filing my complaints about the misinformation shared prior to make us pay for something that clearly wasn't true nor required and fails to give us access - in our motability car into our property to access our home in the elevators - thanks for that Mr Morris."	
20/05/2021	CRM FOI 9853	PCN totals as of today's date with additional sites to be included	This is a FOI request for the current totals to be shared for the exact same locations and specifics (the exact same criterias as the one below from a March was processed) - but on this occasion to ensure it is up until to date - the date in which the FOI is fulfilled.	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021
27/05/2021	CRM FOI 9896	Further FOI in response to CRM FOI 9581	<p>In light of your response, can you please therefore advise (and to treat this as a further request for information):</p> <ol style="list-style-type: none"> 1. Please confirm the total sum that exceeds 1.5m for tranche 2 2. Please confirm how that full sum is spent/to be spent with clear timeline and phasing of how the funds are released 3. Please confirm the total sum of £2,057,930 for streetspace schemes and how that is split over the 15 schemes 4. Please confirm the total sum of £100,000 for Bowes tranche 1 and how that was used. 5. Please confirm the total costs expected for scheme removal 6. Please confirm where in any budget such removal costs has been allocated 	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021



<p>01/06/2021</p>	<p>CRM FOI 9891</p>	<p>Heddon court parade (HCP)</p>	<p>If like my other emails you wish to ignore me, can you therefore treat this and all others as FOIs (complaints are cc'd to ensure you lack of relies are remedied without any further delay). The time to respond to all that are still unanswered by you therefore now must be answered within 20 working days. It's disappointing that this is required to warrant a reply from you.</p> <p>Re Cockfosters:</p> <ol style="list-style-type: none"> 1. Can you please advise why the changes to the road at HCP in Cockfosters which allegedly went live today have no traffic orders listed on LBE traffic site? Please note the evidence has already been gathered so any updates after the changes have been made will be noted too. 2. What is the purpose of such changes? 3. How can anyone object without a traffic order? 4. The road is already heavily congested, what benefits have been assessed? 5. What equalities impact assessment was made prior to enacting the traffic orders here? 6. Please advise where the changes were published and what orders or reference number was provided. Please include the full articles in your response. 7. What other road changes have you created without listed traffic orders? 	<p>Not responded to – Council considered it to be vexatious as per letter of 18 June 2021</p>
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01/06/2021	CRM FOI 9892	School streets Monday-fri & signage	<p>Can you please advise on the below by treating this as a FOI:</p> <ol style="list-style-type: none"> 1. Whether "school streets" mon-fri operational hours are still enforced during bank holidays? 2. Whether school street hours are still operational during half term/school holidays? 3. What information is shared with the public specifically on addressing those questions? 4. What is the consequence for someone entering those planters during bank holiday/half term/school holidays? 5. What assessment was made to determine that there was no need to have any other additional signs to accompany the ones that are there with some further information? 6. What information is there on the sign to advise that emergency vehicles are permitted? 7. What information is there on the sign to advise that those from protected groups may travel through the closed school street areas? 	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021
13/06/2021	No reference allocated	Cannon Road FOI	<p>This is a request for information under the FIOA.</p> <p>Please share:</p> <ol style="list-style-type: none"> 1. The original traffic order from Nov 2017 for the Cannon Road part time closure at school drop off and pick up times. 2. The orders, reports and decisions that relate to the removal of 	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021

		<p>all signage in 2019</p> <ol style="list-style-type: none"> 3. What equality impact assessments were carried out? 4. How were the wider community consulted on the closure in 2017? 5. What were the outcomes of the consultations and the full documents and evidence that relates to such engagements? 6. On what date was this road initially marked and categorised as a "school street"? 7. On what date was the CCTV camera installed? 8. On what date was the 20mph signage installed? 9. On what date were 20mph limits painted onto the road? 10. What procedures have been established for non residents (who are visitors without permits) who attend addresses on Cannon Road prior to the enforceable hours but need to leave during those hours? 11. Are the PCNs valid without a CCTV sign present? If so, what regulations state this? If not, when will they be refunded in full? 12. What assessments were conducted to ensure the clear visibility for drivers allowing them to observe the signage on the left hand side when travelling down Cannon hill (towards aldermans hill/powys lane)? 13. What modifications were made to ensure visibility of those 	
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		<p>signs and on what dates?</p> <p>14. What traffic order do the newly installed signs on Cannon road (in Sept 2020) relate to? Please share that too.</p> <p>15. What date will all enforceable operational hours of school streets be terminated for the summer holidays?</p> <p>16. What date will those enforceable operational hours return after the summer holidays?</p> <p>17. Will signage be affixed to current posts or will current signage be removed to ensure those travelling by car are informed effectively?</p> <p>18. What other communication means will LBE be utilising to ensure the community are aware of this?</p> <p>19. If you intend to keep the hours operational during the school holidays, please share the assessments made and any reports relating to such decision.</p> <p>20. How much funding and investment has been allocated and spent in total for Cannon Road on all changes made?</p> <p>21. Regarding the the question above, Please also include dates of all installations, assessments, consultations/engagements, traffic monitoring, reporting, design, development, school engagement/correspondence, notices and to ensure names and provider/stakeholder/business name for all - i.e assemblies, companies, service providers.</p>	
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16/06/2021	No reference allocated	Re: Further Response from Highways ATTACKER Obstructing access to our private property	<p>Please do not insult me.</p> <p>The management company is appointed by us, the residents, and they acted on what was stated to me directly by the parking team.</p> <p>Please do not insinuate there was any other purpose and if there was, please ensure you release all correspondence in FULL.</p> <p>The applicant can only act upon the information given and as stated, wasn't clear, was stating wrong information and extorting money out of us for something not needed.</p> <p>Therefore please ensure you perform an internal review and supply the requested information above.</p> <p>Should your next response be final, further action may then be taken if a refund is not made.</p> <p>Nobody has requested removal of white line, you can't trap people into getting one painted then try to charge them again for its removal...</p> <p>Should you be unable to regard your duty under PSED and the equality act, please ensure someone else who has been trained in PSED within the last 6 months replies, I do not consent for anyone without such training to respond to me.</p>	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021
21/06/2021	No reference allocated	No traffic order - Green dragon lane lights	<p>Traffic and complaints</p> <p>There are road works at the roundabout of green dragon lane and old park risings.</p> <p>Please advise where the traffic order is? What the roadworks are</p>	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021

			<p>for? How long they a due to last? Why no local residents have been informed?...</p> <p>...Please ensure this is treated as a EIR</p>	
25/06/2021	No reference allocated	Helmets for low income families	<p>Complaints - FAO: Healthy Streets and Cycle Enfield,</p> <p>Can you please advise what deals you have secured or which programmes you have set up to ensure low income families looking to cycle - can do so safely with a helmet that is practical?</p> <p>When it comes to style, fit and weight, the more costly ones are best - however that is not attainable for people here in Enfield (the tiny % who do/might want to consider cycling) especially those not fortunate enough to be in the least deprived parts of the borough where the LTNs have been introduced.</p> <p>Please advise all options of helmets that you have managed to identify and promote (as part of your cycling only schemes and traffic orders during the pandemic).</p>	Not responded to – Council considered it to be vexatious as per letter of 18 June 2021