

Islington's Transport Strategy

Local Implementation Plan 2011 to 2031

March 2012

Appendix H

Consultation
Responses

Islington's response to issues raised during public consultation

| Issue raised | Raised by | Response |
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| Crime prevention; CPDA to be formally involved on individual projects at pre development stage, in order to discuss local Crime Prevention recommendations as well as advise on 'Secured by Design' & 'Safer Places' minimum standards and guidelines. | Islington borough police | LBI will continue to work in partnership with the police, including crime prevention design advisors, to ensure that developments, environmental enhancements and road safety schemes comply with Secure by Design and Crime Prevention Through Environmental Design Principles to achieve Islington's local transport objective to make Islington's transport environment secure. |
| 20mph zones to be properly enforced | ICAG | There is broad support for the 20 mph zones among residents in Islington. However, the Metropolitan Police do not support speed limits which do not include physical measures and are therefore not self enforcing and will not undertake any enforcement action. It is not possible to introduce physical measures to reduce speed throughout the borough. The council has no enforcement powers. |
| 20mph to extended to principal roads | ICAG | Following the success of the 20mph speed limit on residential roads, Islington is now set to extend the 20 mph speed limit to principal roads, subject to funding being identified to meet the cost of implementation and any substantial objections in relation to Traffic Management Orders. These include main routes such as Essex Road, Caledonian Road, Hornsey Road or Stroud Green Road. The 20 mph speed limit does not apply to roads managed by Transport for London. |
| Document proposed means of reducing KSI (cyclists) his goal (continuing 'smarter travel', road safety education and travel awareness projects) are limited in scope and ill-defined. ICAG believes that fewer deaths and serious injuries can be best achieved by LBI committing to reducing motor traffic and road speeds. (2.53, 6.10) | ICAG | <p>Following the success of the 20mph speed limit on residential roads, Islington is now set to extend the 20 mph speed limit to principal roads, subject to funding being identified to meet the cost of implementation and any substantial objections in relation to Traffic Management Orders. These include main routes such as Essex Road, Caledonian Road, Hornsey Road or Stroud Green Road. The 20 mph speed limit does not apply to roads managed by Transport for London.</p> <p>In addition, parking policy, environmental enhancement schemes, gyratory removal, borough wide road safety schemes and training and education will contribute reducing KSI</p> |

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| <p>20 mph enforcement DfT: area based speed cameras are expensive, police reluctant to get involved in enforcement. Z highlighted that therefore it is difficult to extend 20mph to all Islington road. This needs to be highlighted in LIP.</p> | ICAG | <p>There is broad support for the 20 mph zones among residents in Islington. However, the Metropolitan Police do not support speed limits which do not include physical measures and are therefore not self enforcing and will not undertake any enforcement action. It is not possible to introduce physical measures to reduce speed throughout the borough. The council has no enforcement powers.</p> |
| <p>Islington's transport objectives outlined in 3.4 are vague. There is no commitment to reduce motor traffic levels, which according to DfT is a major obstacle to cycling. This is in contradiction to Islington's Fairness Agenda, as poorer people and under 18s do not have access to motor vehicles, and are thus discriminated against. According to the LIP's own figures (table 4), 58% of homes do not own a motor vehicle. Furthermore Council leader Catherine West argues (Islington Tribune November 4th 2011) that "more people turning to cycling to escape the ... inflation-busting fare rises".</p> | ICAG | <p>The mode share of trips made by car in down and the council is committed to reducing motor traffic levels further. All new developments in the borough will be car-free (Core Strategy)</p> |
| <p>There is also no commitment to reduce air pollution, to which cyclists are particularly exposed. The last and the 'Green' objective in the LIP says merely that the 'negative environmental impacts of travel will be managed' ...not reduced!</p> | ICAG | <p>The objective 'Green' has been replaced by 'Healthy – More active forms of travel will be encouraged, and the negative environmental impacts of travel, especially by Islington's poorer communities, will be reduced'</p> <p>NO2 and PM10 objectives from Islington's Air Quality Progress Report 2010n have been included.</p> |
| <p>ICAG would like to see sustainable travel choices, in particular active travel, given comparative advantages over driving throughout the LIP. This includes lower speed limits, filtered permeability and increased cycle parking, while decreasing space for car parking. It's not enough to simply encourage 'less damaging forms of transport'.</p> | ICAG | <p>All suggestions made in this consultation comment are already measures that the council takes to get people to walk and cycle more.</p> |
| <p>Key transport policies (3.16), prioritising demands for road space. We think that cycling should be raised above public transport in the hierarchy because it meets Islington's transport objectives of being green, efficient and fair, and more so than public transport. In addition, and as the report acknowledges, public transport is over capacity at peak times, and therefore the objective should be to increase cycle use, which reduces pressure on public transport.</p> | ICAG | <p>The transport policy has been amended to read: Manage the borough's limited road transport capacity by prioritising pedestrians, public transport and cyclists above all other road users (Consideration for disabled people shall be a key principle throughout this hierarchy)</p> |

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| <p>NAGS HEAD We feel that 4.29, 4.30, and 4.31 understate the miserable transport environment around the Nag's Head. Area residents have to tolerate a high volume and high speed traffic. Unsurprisingly, cyclists are rarely seen on Seven Sisters Road despite this being a key shopping destination. 4.33 states that there is heavy traffic congestion on Holloway Rd. No intervention is proposed in later chapters. Cyclists are deterred by the fast speeds and three lanes of motor traffic, and it is our view that to encourage cycling, these lanes should be reduced in number from three to two, and traffic slowed. Buses and service vehicles should also be filtered at specific points and given priority over private vehicles to give them comparative advantage in line with the modal hierarchy.</p> | ICAG | The LIP states the longer term ambition for Naggs Head, acknowledges issues without making the area seem hopeless and considering other higher priorities. Seven Sisters is a TfL road and any improvements will require their involvement and approval |
| <p>CONNECT 2 At 5.52, the LIP states that 'in 2008, the Council commissioned a Strategic Route Design for the Islington Connect2 Route. The development of the design included engagement with local stakeholders, which created the vision for the route and design ideas for walking and cycling improvements along the route'. However the document should reflect the fact that some stakeholders were critical of the scheme, and that ICAG formally withdrew its support because the scheme did not meet Sustran's own objectives, and offers poor value.</p> | ICAG | It is unclear to which Sustran objectives ICAG refers. No changes made to LIP |
| <p>CYCLE PARKING The section on on-street cycle parking targets at 5.74 is very vague, and lacks targets. (Although ICAG acknowledges that targets can lead to cycle parking being installed in less useful locations). However, cycle parking for commuters should accommodate not only the present numbers of cyclists but also those projected in future targets, which is why the targets are important.</p> | ICAG | There is no on-street cycle parking target in the LIP as suggested by ICAG. The LIP states an estimate for the number of on-street parking spaces that can be created based on funding and existing demand. . |
| <p>The quantity and quality of cycle parking at Islington's stations is in particular very poor. Many railway stations in central London and outside London have far better facilities. The lack of secure and sheltered parking discourages Islington residents from cycling part of their commute and potentially removing one leg of a journey by public transport. Measures to address this should be added to the LIP. Hackney plans to spend £135K over three years to increase cycle parking at all rail, overground and tube stations in the borough.</p> | ICAG | Islington will be installing additional cycle parking facilities as part of environmental enhancement projects (such as Highbury Corner station square) where a high need for cycle parking has been identified. |

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| <p>CYCLE SUPERHIGHWAYS While ICAG acknowledges that Cycle Superhighways are a TfL initiative and are largely situated on TfL controlled roads, we would like Islington to express a greater commitment to the scheme than it does in the draft LIP at 5.79.</p> | ICAG | The council is working actively with TfL to ensure that the cycle super highway will be as safe as possible for all road users and cyclist in particular. |
| <p>5.86 While the numerical replacement of a mature street tree with a sapling is welcome, this is not a like for like replacement so this is not really an improvement to the 'urban forest'.</p> | ICAG | This comment does not reflect activities undertaken by the council in relation to street trees. |
| <p>6.7 Modal share for cycling Both the short-term and long-term targets for the modal share of cycling are disappointingly unambitious. Islington aims to increase cycling as model share from 3.4% (2006 too 2009) to 4%, an increase of 17% by 2013/14. By comparison, Hackney aims to increase cycling from 4% (in 2010) to 7%, a 75% increase by 2013/14. And Camden aims to increase cycling as model share from 3% (2006 too 2009) to 4.5%, an increase of 50% by 2013/14. We believe that the City is planning on similar increases.</p> | ICAG | The LIP has to use the data that TfL requires the council to use to set its targets and it is felt the target is ambitious for the data provided. The council has no resources to undertake additional monitoring. |
| <p>Additional Local Targets Although the 7 day a week, modal share is a valuable target, another significant indicator in terms of carbon, air pollution and obesity, is the ratio of cycles and private cars on the road, particularly during the busy commuting hours. Barnsbury Road and Colebrooke Row at 8.30AM on a weekday morning, provide a glimpse of what cycling could be like across the borough - with the right interventions. The continual stream of cyclists tames the speed of the few motorists.</p> | ICAG | The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets. |

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| <p>The Analysis of Cycling Potential [in London boroughs], December 2010, from TfL http://www.tfl.gov.uk/assets/downloads/corporate/analysis-of-cycling-potential.pdf.pdf says:</p> <p>"On average, a higher proportion of mechanised trips made by residents of inner London are potentially cyclable (39 per cent compared to 33 per cent in outer London). Boroughs with a particularly high proportion of cyclable trips made by mechanised modes are Islington (50 per cent)..." second only to the City of London at 55%.</p> <p>We note that Camden Council to the west of Islington is monitoring the proportion of cyclists in road traffic flow (see 3.72 of their LIP). The Camden LIP says 'Increase cycling's proportion of road traffic flow from 9.7% in 2009/10 to 20.5% in 2019/20'.</p> <p>We note also that Hackney Council have set a local target for "Residents travelling to work by cycle". Their baseline for 2010 is 13% and their 2014 target is 15%. Hackney have also set rising and falling targets for the number of Hackney Council employees arriving by bike and car respectively.</p> <p>ICAG likes the targets introduced by Camden and Hackney and urge that Islington explore creating and setting similar local targets.</p> | <p>ICAG</p> | <p>The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets.</p> |
| <p>6.19 The 37% carbon reduction mentioned in 3.7.1 in the (draft) "Islington 40:20: Achieving the 40% CO2 emission reduction target by 2020" draft action plan for reducing carbon emissions is not explicitly mentioned in this LIP. Yet this is the key document that might be expected to outline how the carbon reduction might be achieved. Furthermore emissions carbon reduction is not even listed as an objective in 3.4. Section 6.19 itemises policies, but the effect of each is not quantified. It is not possible to test the theory that the 'target is ambitious and realistic'. More efficient engine design is surely responsible for some carbon reduction. MTS Goal 5, section 1.19 mentions a 71kt reduction (60% 1990-2025) and says the 'council cannot deliver this alone'. But what can the council deliver?</p> | <p>ICAG</p> | <p>Resources have not been available to allow for analysis of the carbon impacts of individual elements of this strategy. The council previously carried out detailed analysis of current carbon emissions and the potential for reducing them across the range of council activities when the target of 40% carbon reduction by 2020 was adopted. This analysis was adequate to determine that the carbon emission target for land-based transport suggested for Islington by the Mayor of London was achievable.</p> |

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| <p>APPENDIX C Locally Specific targets for Mandatory Performance Indicators</p> <p>2.19 and 2.31 say that the transport strategy aims to reduce CO2 and NOx. But that's not a listed objective in 3.4 in the main document.</p> | ICAG | It would be a waste of resources to monitor or quantify individual schemes (if not impossible). |
| <p>APPENDIX G SCHOOL TRAVEL PLANS</p> <p>Figure 3 shows a huge unsatisfied demand from primary pupils for cycling to school - 33% want to cycle to school but only 4% currently do. Road danger is the obvious reason why - children and/or their parents don't think it's safe to cycle to school in Islington. This frustrated demand is a clear sign that the school travel strategy is not working.</p> <p>Monitoring school travel plans 7.7 specifies targets relating to the administration of the scheme. Given the scale of this programme, it would be useful to set some real targets in terms of modal shift away from private car.</p> | ICAG | Details have been passed on to council officers responsible for school travel plans. No specific target will be set in relation to the modal shift away from the private car where it concerns school travel plans. |
| <p>Please add 'Streetbook SPD – Islington's forthcoming Public Realm Design Guide', or similar, to this list</p> | LBI Inclusive Design Officer | Now included |
| <p>Please remove / re-phrase (possibly with 'new routes to access the green space' or similar) 'shared space' terminology. Also please ensure that reference to Shared Space is removed from any other part of the document. Generally 'Improved urban realm', 're-balancing the street', 'reducing car dominance' etc are preferred and more appropriate phrases.</p> | LBI Inclusive Design Officer | Reference to shared space has been removed |
| <p>There should be a Target for commutes by cycle.</p> | David Kelly | The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets. |
| <p>There should be a commitment to reduce air pollution.</p> | David Kelly | The LIP includes a target for CO2 reduction and states the council's objectives for NO2 and PM10 |
| <p>Speed is a killer on Islington roads, the 20mph speed restriction should be enforced more.</p> | David Kelly | There is broad support for the 20 mph zones among residents in Islington. However, the Metropolitan Police do not support speed limits which do not include physical measures and are therefore not self enforcing and will not undertake any enforcement action. It is not possible to introduce physical measures to reduce speed throughout the borough. The council has no enforcement powers. |

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| There aren't enough secure places to lock up bikes, particularly at tube stations like Cally Road. | David Kelly | Islington will be installing additional cycle parking facilities as part of environmental enhancement projects (such as Highbury Corner station square) where a high need for cycle parking has been identified. |
| We could also benefit from more TfL hire bikes, particularly at hubs and parks, like Caledonian Park with the Tennis Centre and football pitches. | David Kelly | The council is lobbying TfL for additional cycle hire docking stations in order to expand the coverage in Islington. |
| As a Holloway resident, both holloway and seven sisters roads are nightmares. | David Kelly | Although both roads are managed by TfL, the council continues to work with them to make improvements, and details of the aspirations for both roads are set out in the Transport Geography section of the strategy. |
| There needs to be more bike lanes. | David Kelly | The appropriateness for bike lanes will be assessed as part of individual schemes. |
| There is so much more that could be done to encourage, support and make cycling safer | David Kelly | The council recognises that there is much more that can be done to make cycling safer and will continue to do everything it can to improve safety through physical measures, training and education. |
| I believe there is still significant room for improvement in the strategy. In particular, it does not do enough to address the dangers facing cyclists on Islington's roads, and the contribution that cycling could make to meeting the council's objectives if those dangers were reduced enough to make cycling a viable option for most households in the borough, as it is in some cities in continental Europe. | Jim Gleeson | The council recognises that there is much more that can be done to make cycling safer and will continue to do everything it can to improve safety through physical measures, training and education. |
| Cycling safety Recent events, in particular the death of Deep Lee at Kings Cross, have highlighted how unsafe cycling remains in the area. The response of politicians in Islington to Deep Lee's death has been very encouraging, but that position is not adequately reflected in the current draft of the strategy. The draft strategy envisages cycling continuing to grow in Islington (though not very fast – see below) but includes little to indicate that Islington's roads are going to become significantly safer for cyclists in the coming years. If that is the case then the number of cyclist casualties will probably continue to climb (having risen from 18% of total road casualties in Islington in 2004 to 28% in 2010), making the achievement of the casualty reduction targets proposed very unlikely. | Jim Gleeson | The removal of the gyratory is an ambition expressed in the LIP. The council will work with TfL (who control the gyratory) and LB Camden to make cycling safer in the Kings Cross area. |
| That there is huge unmet demand for cycling is demonstrated by the charts on pages 8 and 9 of Appendix G, Islington's Sustainable Modes of Travel strategy. These charts show that 33% of primary school pupils | Jim Gleeson | The council is working actively with TfL to ensure that the cycle super highway will be as safe as possible for all road users and cyclist in particular. |

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| <p>want to cycle to school but that only 4% currently do so. The fact that so many primary school children want to cycle but currently cannot is a clear sign that the current strategy, with 100% of school travel plans in place, is failing. No doubt children enjoy and benefit from cycle training, but it does nothing to change the fact that Islington's roads are too dangerous to allow primary-age children to cycle on. The claim in the strategy that "Islington has a large number of excellent cycle routes" is sadly not backed up by the evidence – if they were so excellent, primary-age children would be safe using them. These figures should be a wake-up call for the council to radically change its approach to cycling provision and, as required by the Education and Inspections Act, "to develop the sustainable travel and transport infrastructure within the authority so that the travel and transport needs of children and young people are better catered for".</p> <p><u>Recommendation:</u> The transport strategy / LIP should therefore set out a clear and strong objective to create cycle routes that even primary age children can feel safe cycling on. As in various Dutch and German cities, this should comprise a mix of segregated, continuous paths on main roads and traffic calming and permeability on minor roads. I'm well aware that you won't be able to deliver a finished network along these lines by 2013/14, but as with anything worthwhile you have to start somewhere.</p> <p>In particular, Islington should work with Transport for London to ensure that the forthcoming Cycle Superhighway in Islington actually delivers a substantial improvement in cycling safety by separating the cycle lane from motor traffic. A Superhighway that simply paints existing lanes blue and installs cycle boxes at junctions which vehicles are free to occupy would be a waste of money and of opportunity.</p> <p><u>Recommendation:</u> Secondly, in order to reflect children's actual transport needs and expressed wishes the transport strategy and the Sustainable Modes of Travel strategy should include a target for the proportion of primary-age children who cycle to school. Currently most targets linked to School Travel Plans (p. 30 of the SMOT) are purely bureaucratic and unrelated to actual outcomes.</p> | | <p>The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets.</p> |
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| <p>Cycling mode share target The evidence provided (p.85), consisting of good reasons why cycling is expected to grow in Islington, suggests that the target is in fact not very ambitious at all, especially given the very fast growth in cycling in Inner London seen in recent years. In Islington's neighbour Hackney, which is very similar in the relevant respects, cycling's mode share is already 5% and the council aims to increase it to 7% over the same timescale. For Islington to aim to raise its cycling share to only 4% by 2013/14 is very unambitious.</p> <p><u>Recommendation:</u> The cycling mode share target should be increased.</p> | Jim Gleeson | Target is kept at 7% |
| <p>Not only is this target unambitious, but it cannot be properly monitored using LTDS data, which in its yearly form cannot produce even moderately precise estimates at borough level, and which in the three-yearly rolling averages published by TfL will not robustly identify any annual change or the outcome position in 2013.</p> <p>An alternative would be to measure the change in levels and share of cycling on Islington's main roads, as monitored on an annual basis by DfT's national road traffic survey. Importantly, this indicator would also include the transport choices of those who are not resident in Islington, who are ignored by the LTDS indicator.</p> <p><u>Recommendation:</u> Consider changing the target so that it can be monitored on an annual basis using DfT data.</p> | Jim Gleeson | <p>The council is aware of the limit effectiveness of LTDS data to monitor cycling levels.</p> <p>The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets.</p> |

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| <p>Strategic Environmental Assessment</p> <p>Below are some comments on the Strategic Environmental Assessment, which in my view contains several flawed judgements. These should be reviewed and the transport strategy amended accordingly.</p> <p>5.13: <i>“The alternative of reducing congestion through restrictions and charges is only supported where there is no negative impact on economic growth or where it does not disproportionately affect poorer people”</i></p> <p>In that case road charges should be supported since the net benefits of road charging have been shown to be positive, while car users are disproportionately likely to be affluent while bus users, who benefit most from reduced congestion, are more likely to be low income. The congestion charge was the single most progressive policy implemented in London in at least the last 20 years, and <u>a progressive council such as Islington should strongly support applying its principles everywhere.</u></p> | Jim Gleeson | LBI not in position to develop own charging system, LIP merely states general principles set out by others. |
| <p>5.17: <i>“Increase barriers, physical or otherwise to road traffic to encourage people to walk, cycle or use public transport.</i></p> <p>The alternative is not supported as barriers to road traffic have a negative impact on the landscape, and heritage and will not achieve benefit on a local level.”</p> <p>No evidence is provided for the arguments that barriers to road traffic have a negative impact on the landscape or do not achieve local benefits. The barriers to car traffic put in place on Lowman Road and Horsell Road have significantly improved street-level amenity and provided safe routes for cycling; <u>similar measures should be applied borough-wide.</u></p> | Jim Gleeson | The barriers referred to in this alternative area measures that will be to the detriment of pedestrians and cyclist, heritage and landscape and as such they are not supported. It does not mean that the council does not support (physical) measures to reduce the negative effect caused by road traffic. |
| <p>5.26: <i>“The alternative of introducing more speed cameras and enforcement can contribute in specific locations but are expensive and do not result in behavioural change.”</i></p> <p>Again, no evidence is put forward to support the claim of no behavioural change. Every rigorous examination of speed cameras by the Department for Transport has identified significant behavioural change and accompanying safety benefits. Without improved enforcement the council's attempts to reduce speeds will not be fully achieved; <u>the position on speed cameras and enforcement in general should therefore be reversed.</u></p> | Jim Gleeson | Amended to read ... 'no behavioural change where there are no cameras.' |
| <p>The “current” (para 2.4 and Table 3) mode share for cycling in Islington is noted in the Transport Strategy as 3.4%. The data provided is a rolling</p> | CTC | The council is aware of the limit effectiveness of LTDS data to monitor cycling levels. |

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| <p>average for 2006-09 i.e. <u>it is more than two years old</u>. Transport for London acknowledges the data in the LTDS transport survey is a poor indicator of cycle usage because of the very small number of cycle users in each borough which is why they are relying on a three year average and even this has proved questionable (see unexplained variations in Hackney data).</p> <p>The use of the overall modal share is also a poor guide to the cycle facilities that need to be provided at workplaces and the on-road provision required for peak time cycling. Cycle commuting levels offer a better indicator. Cycle commuting by Islington residents was estimated as 7% in 2006-09 (LTDS) and 4% in the 2001 census. Morning peak cycle counts at Goswell Road island have shown a doubling of cycle users since 2005 reaching a level of more than 1400 per hour in 2011. Transport for London data show an estimated increase of 187% in cycling from 2001 to 2011 on TLRN roads (TfL business plan 2011 – note that actual growth began in 2003). Department for Transport counts on Upper Street show cycle users to account for 25% of traffic in the mornings.</p> <p>This mutually supportive data shows that that the council's target for 2013/14 has already been exceeded based on the assumption that the 3.4% figure is accurate. Thus the council's short term target of 4% modal share by 2013/14 would imply a reduction in cycle use. Surely this is not the council's intention. The proposed long term target will, at the same growth rate, be exceeded by 2014/15.</p> | | <p>The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets.</p> |
| <p>The Mayor requires councils to contribute to his London-wide target of a 5% modal share for cycling by 2026 or a 400% increase from 2001. As a potentially ideal cycling borough Islington should contribute a substantively higher modal share than 5%. A 400% increase from a base of 2 to 3% implies a modal share of 8 to 12%, rather than 7%.</p> | <p>CTC</p> | <p>A 400% increase in cycling trips would quadruple the mode share for cycling only if the total number of trips remained constant. However, as Islington is experiencing significant population growth, we have calculated that a 400% increase in cycling trips will represent approximately a 7% mode share for cycling. In the absence of anywhere near the level of funding resource the council has had access to over the past several years, the council is unable to commit to a more ambitious target to increase cycling mode share or trips.</p> |

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| <p>Targets : Adopt a real and ambitious target for the increase in cycling in Islington based on a genuine measure (like manual counts combined with data from TfL counter machines). Include this in the revised LIP and negotiate the changes with TfL (TfL say this is agreeable). A modal share 10% by 2015 would be appropriate assuming a current level of 5% or more. Targets for cycle parking and on-road provision should relate to the higher levels of commuter cycling.</p> | CTC | The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets. |
| <p>Remove the barriers to cycling. Archway, Highbury Corner, Angel, Old Street and Nags Head are key junctions which discourage people from cycling. The main roads that connect these junctions also deter people from cycling because of the high volumes of motor traffic and minimal provision for cycle users. Roads like Holloway Road, Seven Sisters Road, Upper Street, City Road and Essex Road all include essential destinations for local residents notably schools, colleges, shops and places of worship. Measures must be taken to provide clear and high quality space for cycle users at all these locations and the borough needs to liaise with Transport for London to ensure progress.</p> | CTC | The LIP has clear ambitions and delivery actions for Archway, Highbury Corner and Old Street to improve cycling in these locations. TfL will continue to work with TfL to remove barriers to cycling on TfL controlled roads in the borough (such as Seven Sisters Road) |
| <p>Lorries: Adopt, TfL funded, driver awareness training, including the practical module which includes cycle training, for all council/contractor drivers (as in Hackney, Lambeth, and Hammersmith and Fulham)</p> | CTC | Islington has no resources to fund driver awareness training at this time. |
| <p>Parking: (We note that Transport for London are releasing new guidance on cycle parking in November 2011 for adoption in the London Plan next year.)</p> <ol style="list-style-type: none"> a. Set cycle parking standards for new developments (and redevelopments) that allow at least 20% of staff/residents to cycle (based on a realistic office space per person measure (10 sq m per person not 25 sq m - Note: measures such as 20 and 25 sq per person pre-ceded offices with modern IT). Office standards should be one space per 80 sq m or better (Hillingdon specifies one per 50 sq m) b. Install cycle parking facilities on every estate that requests it during the period of the LIP c. Ensure that TfL replaces railings with bike stands where required and installs cycle parking along Upper St, Holloway Road and Seven Sisters Road d. Ensure sufficient cycle parking is provided outside all tube and rail stations (Farringdon X-rail, Highbury – TfL railing removal) | CTC | Islington is currently reviewing its cycle parking standards for developments as part of the Development Management Policy. More on-street cycling parking is provided as part of individual LIP schemes as well as in location where a demand has been identified (such as near Highbury Station and Holloway Road) |

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| <p>Filtered Permeability. Improve cyclists' access to all minor roads in Islington by carrying out a systematic permeability programme – a low cost but high reward action. This can be done by a) vetting all new planning applications to ensure full cycle access and b) reducing the number of blocked routes (estimated at around 100) by two dozen per year. Note: Paris allows two-way cycling on all 20 mph streets – this could be adopted in Islington if DfT approval is secured.</p> | CTC | All planning applications are assessed in terms of accessibility, including cycling and the council does not block routes for cyclist. Islington is introducing two-way access for cyclists in locations throughout the borough where this is deemed safe to do so. |
| <p>Safety. Adopt a concrete target for reducing the <u>rate</u> of cycling casualties. At present no separate target is identified for cycle users. Using a rate would reflect any increases in cycle use.</p> | CTC | The council has no resources to undertake additional monitoring and therefore there is no merit in setting additional targets. |
| <p>Road Danger Reduction: Extend the 20 mph default speed limit to all borough roads.</p> | CTC | Following the success of the 20mph speed limit on residential roads, Islington is now set to extend the 20 mph speed limit to principal roads, subject to funding being identified to meet the cost of implementation and any substantial objections in relation to Traffic Management Orders. These include main routes such as Essex Road, Caledonian Road, Hornsey Road or Stroud Green Road. The 20 mph speed limit does not apply to roads managed by Transport for London. |
| <p>Cycle Training: Provide cycle training in all schools on a permanent basis and maintain a programme for adults including council employees. The transport strategy appears to support this.</p> | CTC | This comment is supported by the LIP. |
| <p>Cycle superhighways: See note 2 above. A high quality highway needs to extend beyond the Angel and take riders to their destinations in the City and West End. Measures to reduce 'burst ' speeds, though the use of lower speed limits need to be included .And full use needs to be made of funding for 'complementary' measures along the route (cycle parking, cycle training, workplace facilities etc)</p> | CTC | Lowering speed limits in it self does may not reduce 'burst speeds' The council is working with TfL to improve accessibility and safety for cyclist using the cycle superhighway. |
| <p>Section 106: Ensure that no section 106 opportunity is missed in terms of cycling provision by including clear requirements for developers to provide cycle parking to standards described above.</p> | CTC | This is being done through the Development Management Policy which is currently being developed. |

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| <p>Crossrail 2/Chelsea-Hackney line Hackney understands that with regards to paragraph 4.23 TfL are only considering a branch via Finsbury Park, not as you have expressed it. We would also advise you that Network Rail's recently-published London & South East Route Utilisation Strategy confirms TfL's phase 1 terminus as Hackney Central, with options for later phases extending north and east from there.</p> | LB Hackney | This section of the LIP has been revised. |
| <p>High Speed 2 Please be advised that for paragraph 4.57 a broader view of the HS2-HS1 link is needed. The problem with the DfT's latest proposal is not that it doesn't provide a direct link; it is that the direct link proposed would unacceptably reduce the capacity of the North London Line for passenger and freight through the Camden Road area. The need is not for '<i>a more direct link for services to mainland Europe</i>'; it is for a link which has no adverse impact on the North London Line AND is of sufficient capacity for three groups of services: international [including planned destinations beyond the current Eurostar termini], inter-regional [services between Kent and the Midlands, possibly beyond], and intra-regional [services between Kent and Old Oak Common as a high-speed orbital to west London also relieving St. Pancras's three high-speed 'domestic' platforms].</p> | LB Hackney | This section of the LIP has been revised and now reflects the concerns raised. |
| <p>Highbury Corner proposals Hackney fully supports this scheme that removes the gyratory system as long as the potential for traffic seeking alternative routes is assessed and there are no negative impacts on journey time reliability for the 277 bus route.</p> | LB Hackney | Full traffic modelling is undertaken as part of the Highbury Corner proposals. It is envisaged bus journey reliability in this location will improve with the removal of the gyratory. |
| <p>Old Street Roundabout proposals Whilst it is agreed that LB Islington has been working with Hackney and TfL for a number of years, to take forward proposals to improve the area around Old Street Roundabout, we have not collectively agreed the closure of the north-west arm or found an alternative solution. Until it can be demonstrated by way of extensive traffic modelling that the closure of the north-west arm is a workable solution, the closure appears an unlikely outcome. LB Hackney remains unconvinced at present, and further consideration of alternative options is required. Hackney requests that Islington's LIP2 wording is amended to reflect this position.</p> | LB Hackney | acknowledged |

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| <p>Section 4.28 to 4.38 is about the Nags Head area and Upper Holloway Road. In Particular 4.30 says that Holloway Road suffers from a poor physical environment and lack of green space.</p> <p>I would like to suggest that instead of having the flower baskets in the summer only along this stretch of road, that shrubs could be planted on either side of the railings, or climbers to climb up the railings if shrubs were felt to be too wide, to create a green corridor up the middle of the road. If some evergreens were used it would give greenery throughout the year. Drought tolerant varieties could be sought. Once the plants were established they would need very little care unlike the constant watering needed by the flower baskets.</p> <p>We have seen this in France where they had flowering bushes such as roses along the roads and I think it would make a big improvement to the street scene and perhaps help to reduce pollution a little.</p> | Deborah Fuller | Measures to enhance and green areas will be considered as individual schemes, taking into consideration cost and appropriateness for the area. Maintenance cost are an important consideration. |
| <p>First, on road casualties Table 6, para 2.52 of main text gives for 2010, KSI: 81 and total: 833. But in Appendix C, locally specific targets, for the same year KSI are recorded as 89 and total as 695. What am I missing? and have I misinterpreted one of the tables?</p> | Deborah Fuller | The LIP has been amended to reflect that some of these figures were actual casualty figures and that some of them were three year rolling averages. The figures are now consistent and an explanation is provided on what these figures represent. |
| <p>A different query I have concerns the interpretation of casualties relating to modal share of trips. In para 2.53 a comparison is made between the figures in Table 3 and Table 6 and the much lower accident rate for pedestrians given their modal share. But as is commonly noted and stated elsewhere pedestrians tend to take numerous short trips - today I have made 6 trips by foot, none of more than 10 minutes. Whereas observing the density of cyclists at rush hour I would guess many make possibly just 2 trips a day - and much longer than 10 minutes. I'm not for a moment suggesting that cyclists, for example, are not vulnerable, suffering many accidents - far too many. It's just that where pedestrians are concerned I rather think looking at modal share overestimates the numbers. I think that what one would need to make a true comparison would be exposure to road conditions, ie. time spent for all the different groups to relate to their accidents. My guess is that per trip car drivers clock up the longest time and pedestrians the least. Is there any such information - however dated - available?</p> | Deborah Fuller | The LIP states the vulnerability of both pedestrians and cyclist. As only limited data and resources are available, such detailed analysis is not an option. |

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| <p>A minor point which we want to draw to your attention is the lack of reference to Islington Living Streets as a stakeholder in the consultation (see paragraph 5.92 and Appendix F); an oversight we are sure but one we hope will be corrected in the final version.</p> | Living Streets | Living Street has been added to the list concerned |
| <p>We would like to have seen some detail as to how the <u>maintenance budget</u> funded by the Council is to be used and we trust that pedestrians will be given priority and a substantial proportion will be allocated to footway and crossing improvements. The more safe and attractive walking is made the more we are likely to achieve the goal of increased walking which – as is recognised – will decrease congestion, and make for a more healthy population; and quite simple measures will cut casualties. Furthermore, there is a double fairness factor in providing them. Everyone uses the footway to some degree – even if only to walk to a car/bus – so everyone benefits. More important, among those who mainly walk there are disproportionately more vulnerable people, the poor, the elderly, the young and those with mobility, sight or hearing difficulties. Improvements affecting those on foot are also relatively cheap. Improvements which significantly aid safe walking are: footway renewal, de-cluttering the footway, new pedestrian crossings where necessary and existing ones refurbished to an acceptable standard, removal of guard rails, and, if possible, widening very narrow footways. A priority for us is the renewal of zebra crossings – essential for both motorists and pedestrians that they are clearly marked. Many crossings, like the one in Drayton Park, (a road of speeding traffic as recognised in your draft) by the junction with Arvon Road, used by many going to the station on one side or the Primary school on the other, are in such a poor state that the black markings are hardly visible.</p> | Living Streets | Details on how the maintenance budget is spent are detailed in he LIP. |

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| <p>Mode share for walking is one of the two factors, for which mandatory indicators are given, on which we want to comment. Walking trips per day are still proportionately the highest of all modes: 40%, compared with 23% for bus use, the next highest mode; higher also than the inner London average, 35%, or all London at 31%. Partly this is because Islington is a densely populated borough with facilities easily accessible and, of course, many trips are of short duration. Nevertheless, as stated above there are good reasons for seeking to increase the walking share. The draft documents the projected population increase, employment activity and transport developments all of which will bring more people moving around the borough. Encouraging walking is necessary to decrease congestion on the roads and the pressures on public transport; better provision for walking is therefore essential.</p> | Living Streets | This comment is supported by the LIP |
| <p>First, we think the targets proposed are far too modest. With a base line of 39.8% for 2006/07 to 2008/09 to propose 41% for 2013/14 and 43% for 2025/26 is pathetic and will do little to cope with the increasing pressures. Although no figures were provided in the first LIP statistics were available for trips to school (see below) and we said then that the target given was too low – and were proved right. If the Council is serious about increasing walking, a target of at least 43% for 2013/14 should be set and action taken to support that goal.</p> | Living Streets | |
| <p>Second, the proposed key actions for Islington to increase walking mode share are disappointingly vague. The measures suggested above for the maintenance budget should all be considered. In addition, it is surprising that no mention is made of enforcement of the 20mph borough scheme; apprehension about speeding traffic is a factor inhibiting some from walking when crossings are poor and/or poorly sited. Equally, the lack of reference to action against pavement cycling – another deterrent to many elderly and/or mobility impaired people – is regrettable; actions we would like are well known to the Council.</p> | Living Streets | |

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| <p>School Travel is an area in which the Council has already done much to promote more sustainable travel for students and we hope adequate funding will be safe-guarded to ensure that this is sustained. In particular, the School Travel Plans have demonstrably contributed positively in many ways not least in achieving a reduction in car use. The document records that in 2010 59% of pupils usually walked to school; in the first LIP consultation the proportion walking to school in 2001 was recorded as 44%; we then recommended a target, much higher than that proposed, of 58% by 2011. We claim no responsibility for this rise, although we strongly urged for more support for school travel initiatives, and undoubtedly the resources allocated and practical improvements on 'walk to school' routes have contributed to the improvements. Apart, from safe-guarding funds in this area we would like to suggest an increase in support for WOW, Walk on Wednesday, introduced 4 years ago, and continued support for Walk to School Week.</p> | <p>Living Streets</p> | <p>This commented is supported by the LIP</p> |
| <p>We agree with the views expressed in the document: pleasure at the reduction since 2001 but regret that there are still so many. We challenge, however, the interpretation put on the level of casualties for different road users which is arrived at by comparing the mode share, measured by <i>trips</i> per day, with road traffic casualties to <i>users</i>. This is not comparing like with like. As is well known, and recognised in the document, pedestrians tend to make numerous short trips. To conclude – as is implied – that because walking accounts for 35% of all daily trips but only 21% of road casualties (data for a different date than those quoted above) pedestrian casualties are lower than other groups is fallacious. We strongly urge that the relevant paragraph (2.53) is redrafted as we think that as it stands it will give rise to unfounded conclusions about both the vulnerability of pedestrians and the need for measures to improve their safety.</p> | <p>Living Streets</p> | <p>This paragraph rightly points out the over-representation of casualties among cyclist and then continues to state that both pedestrians and cyclist are vulnerable road users.</p> |

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| <p>Although there has been a significant decrease in both total casualties and numbers of people killed or seriously injured (KSI) in the last decade, for the last 5 years the trend has not been linear. In 2010, the rate for all casualties exceeded that recorded for each of the preceding 5 years while the down-ward trend for those killed or seriously injured showed a marked increase in 2007 with 2010 reverting to the level recorded in 2006. This is worrying and suggests that current measures will not of their own deliver the quite modest targets for road traffic casualty reduction proposed. As the Performance Plan uses different data from those included earlier in the document, it is difficult to comment clearly on the targets and it does depend on the date chosen as the baseline. For example, the target for those killed or seriously injured in 2013 is 70 compared with actual figures of 81 in 2006 and 2010, but 75 in 2008 and 77 in 2009.</p> | | <p>The LIP has been amended to reflect that some of these figures were actual casualty figures and that some of them were three year rolling averages. The figures are now consistent and an explanation is provided on what these figures represent.</p> |
| <p>What is clear to us is that the key actions proposed for Islington may be insufficient and more effective action may be needed if significant reduction in casualties is to be realised. Although others besides Islington have responsibility for improving road safety we think that a principal action for the Borough should be enforcement of 20mph borough scheme on borough roads and pressure on TfL to enforce on roads for which they are responsible.</p> | <p>Living Streets</p> | <p>Following the success of the 20mph speed limit on residential roads, Islington is now set to extend the 20 mph speed limit to principal roads, subject to funding being identified to meet the cost of implementation and any substantial objections in relation to Traffic Management Orders. These include main routes such as Essex Road, Caledonian Road, Hornsey Road or Stroud Green Road. The 20 mph speed limit does not apply to roads managed by Transport for London. The council continues to work with TfL to ensure road safety is improved on roads managed by TfL.</p> |