

Equalities Impact Assessment: Full Assessment

Before completing this form you should have completed an Equalities Screening Tool and had sign off from your Head of Service and the Fairness and Equality Team.

This Equality Impact Assessment should be completed where the Screening Tool identifies a potentially negative impact on one or more specific groups but it can also be used to highlight positive impacts.

Summary of proposal

Name of proposal	Decision on a new St Peter's people-friendly streets Low Traffic Neighbourhood trial, with an exemption for Blue Badge holders
Reference number (if applicable)	
Service Area	Climate Change and Transport
Date assessment completed	22 December 2021

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact equalities@islington.gov.uk.

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

The St Peter's Low Traffic Neighbourhood (LTN) is part of the council's people-friendly streets (PFS) programme that was agreed by the council's Executive on 18 June 2020. The decision to introduce the St Peter's LTN as an 18-month trial was taken by then Corporate Director of Environment and Regeneration in consultation with the Executive Member for Environment and Transport on 25 June 2020. The scheme was implemented through an Experimental Traffic Order (ETO) that was made on 26 June 2020 and came into force on 3 July 2020. A further ETO was made on 9 June 2021 (coming into force on 25 June 2021) to enable changes to the LTN.

The St Peter's LTN uses five traffic filters, which are point closures of streets in the area. These restrictions mean that there are no longer any short-cuts for drivers between the main roads which form the boundary of the area. Four of these filters are camera-enforced, and one is a physical closure, using bollards. The camera-enforced filters are 'open', and use signage to inform drivers that they cannot pass the restrictions. The open nature of the filters means that emergency vehicles (which are exempt) can pass through unhindered.

Originally, the St Peter's LTN was designed so traffic filters applied to all people driving without any exemptions, beyond emergency vehicles and some council service vehicles. The council's initial rationale to not provide exemptions was based on three reasons:

- Access to all addresses is maintained within LTNs, but routes may need to change.
- To create a safer environment for people to walk, wheel and cycle by significantly reducing motorised traffic on local streets.
- To reduce congestion and air pollution on the main roads. The objective of people-friendly streets is to reduce the overall number of trips, by supporting a change of transport away from private cars.

As outlined in the 22 December 2021 delegated decision report for St Peter's, a new ETO is being introduced in this LTN to support a policy change adopted in the people-friendly streets Executive Report of 14 October 2021. This new policy introduces exemptions for vehicles registered to the address of any Blue Badge holder who lives in the St Peter's LTN. This EqIA is required to support the new decision regarding Blue Badge exemptions.

Beneficiaries of this new proposal will primarily be eligible Blue Badge holders who live in the LTN or on boundary roads of this LTN. The outcomes will be that local Blue Badge holders who receive permits will have shorter and more convenient local journeys by motor vehicle. It is possible that an increase in traffic within the area from Blue Badge holders using the roads

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could have a negative impact on some people with protected characteristics and this is explored below in more detail.

There is unlikely to be any significant impact on savings and income generation. PCNs will still be issued for all vehicles which are not exempt. There are some costs related to physical changes to the traffic filters and additional signage requirements – these are necessary for safety or legal reasons.

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

The assessment in this section does not consider the impact of the LTN overall, as these impacts were considered in resident impact assessments (RIAs) dated [23 June 2020](#) and [8 June 2021](#). These overall assessments have been updated and included in the tables in 3B which discuss the specific impacts on people with protected characteristics and from disadvantaged groups. The paragraphs below cover the impacts of the proposed changes to the traffic orders to allow exemptions for Blue Badge holders.

The impact of the changes introduced in the 22 December 2021 delegated decision report will be external, and will impact on anyone using the St Peter's LTN. Beneficial impacts will be felt by any Blue Badge holder who meets the following criteria:

- Lives in the St Peter's LTN (this includes properties on the LTN side of the boundary roads)
- Has access to a vehicle which is registered to their home address.

These eligible Blue Badge holders will be granted a permit for their vehicle to be able to pass through all camera-enforced traffic filters in the St Peter's LTN without receiving a penalty charge. This will help disabled people who rely on their vehicles for short local journeys, allowing them to enter and exit the LTN from any of the boundary roads, and take the shortest journey to and from the boundary road to their home (or any other location inside the LTN). At the time of writing, there are 418 Blue Badge holders estimated to live in the St Peter's LTN, although not all will have a vehicle registered to their address.

The council is also developing an 'exceptional circumstance dispensation' policy which will provide people who do not live within an LTN an opportunity to apply for an exemption from a single filter. This is intended to shorten specific regular journeys for people who have no other option than using a car and who are severely affected by longer journeys. Details on this policy will be provided in due course, and that policy will apply across all PFS schemes including St Peter's.

Other users of the LTN, particularly people walking, using wheelchairs (or other mobility aids), or cycling, may notice an increase in traffic volumes inside the LTN. Monitoring data shows that traffic volumes have fallen by 56% since the scheme was first implemented, and local people may have become accustomed to these lower volumes, which make it easier to cross the road, have reduced road danger, and reduced noise and vehicle emissions.

By granting all eligible Blue Badge holders in the LTN an exemption from the designated traffic filter restrictions, this reduction of traffic volumes may be reversed to some extent. In particular, there may be an increase in vehicle movements near (and through) the traffic filters themselves - areas where for the past 18 months, there have been very few vehicle movements. However, compliance at traffic filters with other motorists might increase, which could reduce the number of vehicles driving through the filters, and offset the increase in traffic from the Blue Badge exemption. For many people who use the streets and pavements of the St Peter's LTN, the impact of these changes may be an increase in road danger, noise and emissions, due to a slight dilution of the integrity of the LTN.

This change would be most impactful on groups who have reduced mobility and may move more slowly. This includes disabled people, older people, children and younger people, and people using prams and buggies.

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

The St Peter's LTN is located in the St Peter's Ward. Table 1 provides a demographic breakdown of St Peter's, compared to Islington and London as a whole.

There are more people who identify themselves as having a disability in St Peter's (and in Islington) than the London average. The larger percentage of Islington people who have a disability is particularly significant for this RIA and is referred to in the assessment of equalities impacts.

The project area covers the ward of St Peter's. Socio-economic and disability data indicates that St Peter's Ward has more deprivation than the Islington average and is rated as 4th most deprived in the borough.

There is a slightly higher than average percentage of people who are BME in the St Peter's ward, with the Islington average being 32% and St Peter's 35%.

Whilst private cars, taxis, and private hire vehicles can be an important means of transport for disabled people, the main means of transport used by disabled Londoners at least once a week are walking (81%), bus (58%), car as passenger (42%) and car as driver (24%).

(Source: Travel in London: [Understanding our diverse communities 2019, \(TfL, 2019\)](#)). Table 2 below shows the percentages of different trips by mode by different users, showing that disabled people in Islington are more likely to be car passengers (16.7% of trips) than non disabled people (6.2% of trips). The proposed exemption for St Peter's in parts addresses this.

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	London	Islington	St Peter's Ward
	Total: 8,173,941	Total: 206,125	Total: 14,072
Gender: Female	51%	51%	49%
Gender: Male	49%	49%	51%
Age: Under 16	20%	16%	15%
Age: 16-24	12%	14%	13%
Age: 25-44	36%	42%	43%
Age: 45-64	21%	19%	20%
Age: 65+	11%	9%	9%
Disabled	14%	16%	16%
Ethnic group: BME	40%	32%	35%
Ethnic group: White	60%	68%	65%
Religion or belief: Christian	49%	40%	43%
Religion or belief: Muslim	12%	9%	10%
Religion or belief: Other	10%	4%	3%
Religion or belief: No religion	21%	30%	30%
Religion not stated	9%	17%	14%

Table 1 - demographics of London, Islington, St Peter's ward

Source: 2011 Census data available at: <https://www.nomisweb.co.uk/>

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Mode	All users in London	Disabled people in Islington
Walk	42.0%	41.2%
Pedal cycle	4.9%	1.2%
Car driver	7.4%	8.9%
Car passenger	6.2%	16.7%
Motorcycle	0.1%	0.0%
Van	0.3%	0.2%
Bus (public)	14.3%	14.4%
Underground	15.0%	11.4%
National Rail train	4.9%	1.7%
Taxi - London black cab	0.8%	1.7%
Taxi - other/minicab	1.6%	1.5%
London Overground	2.2%	1.1%

Table 2 - Percentages of different trips by mode by different users

Source: Analysis of the London Travel Demand Survey (LTDS) during the period 2016-19 (London Travel Demand Survey: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/consultations-and-surveys#on-this-page-1>)

Borough-wide evidence and rationale for the introduction of the Blue Badge exemptions can be found in the [resident impact assessment](#) (RIA) which accompanies the [Executive Report](#) on people-friendly streets which was published in October 2021. It is worth noting that the RIAs are now called EqIAs again. Islington has one of the lowest proportions of car ownership per household in the country, with 71% of households having no access to a car. (Source: [Streetspace funding guidance - Appendix 7 2021](#)). Transport for London (TfL) has analysed that two thirds of car journeys in London can be walked or cycled - this proportion is likely to be even greater in an inner London borough like Islington. The implication of these figures is that there is great potential for a large number of trips in Islington to be made by modes other than private car, and even that many existing car journeys could be shifted to active travel modes, with public health and air quality benefits for all Islington residents.

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24.3 million more miles were driven through Islington in 2019 than 2013 – an almost 10% increase. (Source: Department for Transport (DfT) <https://roadtraffic.dft.gov.uk/local-authorities/96>). Traffic on London's local ('C' or unclassified) streets has risen by 72% between 2009 and 2019, whereas traffic on A and B roads has seen a slight fall over the same timeframe. (Source: DfT <https://roadtraffic.dft.gov.uk/regions/6>). A and B roads were designed with signalised and multi-lane junctions, wider pavements, formal pedestrian crossings and bus lanes, all of which mean they are able to more safely manage higher volumes of motor traffic than local streets.

There is also a disparity in the road danger present on minor and main roads. In the UK, the most common non-natural cause of death amongst children aged 5 – 14 is being hit by a vehicle (http://www.sd-commission.org.uk/data/files/publications/fairness_car_dependant.pdf), with a mile driven on a minor road, compared to a mile driven on a main road, twice as likely to kill or seriously injure a child pedestrian, and three times more likely to kill a child cyclist. (<https://www.icevirtualibrary.com/doi/pdf/10.1680/jmuen.16.00068>)

Disabled people are five times more likely to be injured as a pedestrian than non-disabled people. (<https://roadsafetygb.org.uk/news/disabled-and-low-income-pedestrians-at-higher-risk-of-road-injury/>)

However, LTNs installed in London in 2020 have been shown to reduce the number of injuries from road traffic collisions by half, relative to the rest of London, with no evidence of increased injury numbers or risk on LTN boundary roads (<https://findingspress.org/article/25633-impacts-of-2020-low-traffic-neighbourhoods-in-london-on-road-traffic-injuries>). The people-friendly streets programme has therefore improved the safety of local roads without putting excessive burden on boundary roads.

As the Islington Transport Strategy notes, "Children from black and minority ethnic backgrounds are one and a half times more likely to be killed or seriously injured in a road collision than children from other backgrounds", so reducing road danger through implementing LTNs seeks to address this inequality directly.

Given the reasons above, more space needs to be allocated to active travel modes. These modes make a significant contribution to reducing road traffic congestion and improving health. They are also an affordable way of getting around.

The Blue Badge exemption policy is discussed in paragraphs 3.3.62 to 3.3.68 of the [Executive decision report](#) and pages 7-10 of the RIA). This policy exempts Blue Badge holders from the

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designated traffic filters of their home LTN for a single vehicle registered at their address, allowing them to drive through the restrictions.

This Executive Report was published with an additional appendix, produced external transport consultancy Steer, called 'Journey Lengths and Times Analysis'. This provides data and analysis of typical motor vehicle journeys in Islington, including journeys within and between low traffic neighbourhoods. The study shows that "the impact of the restrictions on short journeys is significantly higher than the impact on long journeys" (paragraph 5.5), which leads to the recommendation that Blue Badge exemptions should be implemented within each LTN.

As of October 2021, there were 7,788 Blue Badge holders in Islington, 1,713 of whom live within existing LTNs.

In order to understand if the exemption policy would allow too much traffic through the LTN and therefore reduce its benefits, officers carried out an assessment of these numbers, by combining them with current data for vehicles breaching the restrictions at each filter to construct a model for maximum vehicles per hour passing through each filter at peak time. This assessment showed that, while there were possible increases of traffic at each of the LTN filters following the exemption, the forecasted level of two-way traffic was acceptable. It must be noted that, based on feedback gathered through correspondence and surveys, many disabled drivers have continued to make motor vehicle trips with the existing LTN restrictions in place. This means that allowing these drivers exemptions to local filters may not increase actual total trip numbers significantly. Furthermore, the length of these essential car journeys might actually decrease as routes become more direct. There could be an increase in Blue Badge applications which could encourage shorter car journeys and increase traffic in the LTNs. However, compliance at traffic filters with other motorists might increase, which could offset the increase in traffic from the Blue Badge exemption. Officers will monitor applications to review this risk. Additionally, the approach might incentivise disabled people who rely on car transport such as taxis to purchase their own cars, which would increase car ownership, pressure on parking and increase the number of car trips within LTNs.

3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics

Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
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Age	Positive and Negative	<p>Positive:</p> <p>For people of any age who are eligible for an exemption permit, local journeys by motor vehicle will be made shorter and more convenient.</p> <p>An increase in activity, including walking and cycling, benefits children in terms of reducing childhood obesity.</p> <p>The Fair Futures Commission found that some of the barriers to children and young people travelling independently revolved around concerns for personal safety, due to the threats from road danger. Reduced road danger should facilitate independent travel for children and young people, which is crucial to healthy child development.</p> <p>Older people, who have higher instances of disabling conditions such as mobility impairment, deafness or blindness will benefit from reduced traffic and road danger because of the lower volumes of cars traveling through the LTNs. In addition, older people are also more likely to live with dementia and will benefit from reduced noise pollution. Those older people who are able to increase their active travel will see benefits to their mobility and health.</p> <p>The LTNs create improved conditions for cycling, particularly benefitting those older or younger residents with less balance who may want to choose adapted cycles away from traffic.</p> <p>Air pollution from motor vehicles has a significant impact on younger people who are closer to the car exhaust level and who have lungs that are still developing. A growing body of research demonstrates that this impact can result in significant health complications later in life impacting on their life expectancy and quality of life. Older adults are also known to be particularly sensitive to air pollution.</p>	<p>Positive:</p> <p>Permits for the local LTN Blue Badge exemption will be directly granted to eligible residents (those who are Blue Badge holders, living within the LTN and also holding a Free Resident Parking Permit (FRP) and/or Dedicated Disabled Bay (DDB)). Granting these permits removes the burden of applying, as their registered vehicle details are already known to the council. For Blue Badge holders without an FRP or DDB, a short application will be required to provide evidence of a vehicle registered to their address.</p>
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	<p>Older and younger people will benefit from safer crossings in particular because they can take longer to cross the road than the average-aged person.</p> <p>Children who have disabilities or mobility impairments may benefit from the Blue Badge exemption policy, if their carers live with them inside an LTN. The exceptional circumstance dispensation for this exemption may also benefit children who, for example, attend a school in an LTN. It is also likely that older people with limited mobility who travel by private car are likely to have Blue Badges, and could benefit from the same policy. The positive impacts of LTNs on local traffic levels, as evidenced by interim monitoring reports, means less congestion for exempt vehicles.</p> <p>Negative:</p> <p>Although it is possible to access all addresses the number of older people who travel by private cars, private vehicles for hire, or taxis for their local trips may increase over time and so may be inconvenienced by longer journeys. Longer journeys may also involve higher costs.</p> <p>Children and older people who do not drive could be impacted by the exemption policy if local traffic rises. This could make streets more unsafe, and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the low traffic neighbourhoods.</p>	<p>Negative:</p> <p>The London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired. This could offset some of the increase in costs resulting from slightly longer routes as a result of the LTN schemes. The council will work to promote uptake of this scheme amongst potentially affected groups.</p> <p>The changes that will introduce limited exemptions for Blue Badge holders partly mitigates this identified impact on shorter journeys for some disabled people (which</p>
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			<p>may include people of all ages, including older people and children / young people).</p> <p>The exemption for people with an exceptional circumstance dispensation may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). However, the exemption does not address the needs of those who rely on taxis or other private hire vehicles.</p> <p>The council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and</p>
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Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			<p>regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents.</p> <p>Monitoring traffic levels after implementation of the exemption policy to ensure traffic is kept at low levels. If traffic increases significantly, a review of exemptions would take place.</p> <p>Ensure signage is appropriate at camera-enforced filters.</p>

Disability	Positive and Negative	<p>Positive:</p> <p>Compared to the London average, there is a higher proportion of people in Islington who identify themselves as being disabled (16%, compared to the London average of 14%). Compared to the London average a higher proportion of people in St Peter’s ward identify themselves as being disabled (16% compared to 14%).</p> <p>LTNs can enable easier or more pleasant journeys for disabled people: an increase in independence, a decrease in traffic danger and benefits to physical and mental health.</p> <p>Pedestrian enhancements could be of particular benefit to people with a disability in terms of navigating the urban environment, including but not limited to those using walking aids, a wheelchair or a mobility scooter. This includes the improvements made through the emerging people-friendly pavements project, which will remove existing barriers, reduce clutter and improve maintenance.</p> <p>In residential areas, those with cognitive disabilities could benefit from reduced levels of noise pollution, supported by the neighbourhood walking and cycling improvements and the removal of through-traffic. Moreover, some disabled people may feel more comfortable accessing the businesses in LTNs, due to the reduction in traffic as a result of the PFS measures.</p> <p>Research has shown that one of the main reasons that disabled people do not cycle more is due to inaccessible infrastructure, even though 75% of disabled cyclists report that they find cycling easier than walking (Assessing the needs and experiences</p>	<p>Positive:</p> <p>Permits for the local LTN Blue Badge exemption will be directly granted to eligible residents (those who are Blue Badge holders, living within the LTN and also holding a Free Resident Parking Permit (FRP) and/or Dedicated Disabled Bay (DDB)). Granting these permits removes the burden of applying, as their registered vehicle details are already known to the council. For Blue Badge holders without an FRP or DDB, a short application will be required to provide evidence of a vehicle registered to their address.</p> <p>The council funds Pedal Power sessions for all-</p>
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	<p>of disabled cyclists 2018). The proposals in LTNs will greatly improve conditions for disabled cyclists by reducing road danger without the need for further traffic calming measures.</p> <p>In this way, providing better conditions for cycling can empower more disabled people to cycle, particularly those with less balance who may want to choose adapted cycles away from traffic. All traffic filters in the LTNs have been designed in a way that is inclusive and accessible to larger cycles such as tricycles and cargo cycles in line with the London Cycling Design Standards.</p> <p>People who are Blue Badge holders who live within an LTN and have access to a vehicle registered at their address will also benefit from the proposed exemptions at designated camera-enforced filters in the LTNs where they reside. The exceptional circumstance dispensation for this exemption may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). The positive impacts of LTNs on local traffic levels means less congestion for exempt vehicles.</p> <p>Negative:</p> <p>Although it is possible to access all addresses, there may be an increase of disabled residents or visitors who travel in private cars, private hire vehicles (PHVs), or taxis may have to use new routes for their local trips and so may be inconvenienced by longer journeys (which may also involve higher costs).</p>	<p>ability cycling, enabling people with a range of disabilities to experience safe cycling at the Emirates and Finsbury Park.</p> <p>Negative:</p> <p>The London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired. This could offset some of the increase in costs resulting from slightly longer routes as a result of the LTN schemes.</p> <p>The changes that will introduce limited</p>
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	<p>However, it must be noted that private cars are just one means of travel for disabled residents and therefore should be considered on balance with the benefits. Evidence in section 3 of this EqIA shows that the proportion of trips taken by car, as a driver or passenger, is 25.6% for people with disabilities in Islington and 13.6% for Londoners as a whole. The main means of transport, used by 81% of disabled Londoners at least once a week is walking.</p> <p>The council is committed to engaging with disabled people and has undertaken pre-consultation engagement with disabled people and groups representing them, and listened to feedback submitted via Commonplace, the trial feedback surveys and general correspondence. This engagement forms part of the evidence informing the proposed exemption policy.</p> <p>The council is therefore now proposing exempting Blue Badge holders who live within (or on the boundary of) an LTN from local camera-enforced filters. Blue Badge holders will be able to register a single private vehicle for these exemptions, which should improve journey times for local trips. The exceptional circumstance dispensation for this exemption may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). However, this policy does not extend to covering trips across neighbouring LTNs, as the council has chosen to limit the exemption to shorter trips that are more impacted in terms of journey time and length compared to medium and longer trips.</p> <p>Blue Badge holders who do not live within an LTN will see no change from the current position after the exemption policy is implemented. These Blue Badge holders have been given consideration, but will not be included in the exemptions,</p>	<p>exemptions for Blue Badge holders partly mitigates this identified impact on shorter journeys for some disabled people.</p> <p>The exemption for people with an exceptional circumstance dispensation may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). However, the exemption does not address the needs of those who rely on taxis or other private hire vehicles.</p> <p>The council will work with other boroughs,</p>
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	<p>as traffic filters do not currently affect journeys from their home to nearby main roads around their local neighbourhood. However, they may be able to use the exceptional circumstance dispensation to apply for an exemption which allows access through a designated filter in an LTN.</p> <p>Similarly, people with disabilities who rely on taxis and PHVs, carers who are not eligible for the Blue Badge exemption and doctors will not benefit from the new exemption policy. As discussed in the 'Overview' paragraphs at the start of section 3 of the programme-wide RIA, the council seeks to balance exemptions with the benefits of reducing local traffic for all residents, including those with protected characteristics who have benefitted from the LTNs as they currently exist.</p> <p>At time of writing, it is not possible to implement an exemption for Blue Badge holders using taxis or PHVs, as enforcement cameras would not know whether a Blue Badge holder (who is resident in an Islington LTN) is travelling in a vehicle. To apply the exemption to these Blue Badge holders, the implementable solution would be to exempt all taxis and PHVs that could use Islington's roads, which would have significant impacts in terms of traffic volumes and dilute the benefits of the LTNs. There are 114,900 licenced taxis and PHVs operating in London, as of 2020 (source). This alternative is not considered acceptable. Therefore, for the purposes of the experimental traffic order and any future traffic order which supersedes the ETO, Penalty Charge Notices (PCNs) will apply to non-exempt vehicles going through the filters.</p> <p>If a technological solution can be found which allows specific and timed exemptions for only those taxi/PHV trips taken by Blue Badge holders who are resident in Islington, compatible with our current use of Automatic Numberplate Recognition (ANPR), then the council will consider exemptions for taxis/PHVs for the purpose of</p>	<p>TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents.</p> <p>Monitoring traffic levels after implementation of the exemption policy to ensure traffic is kept at low levels. If traffic increases significantly, a review of exemptions would take place.</p> <p>Ensure signage is appropriate at camera-enforced filters.</p>
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Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
		<p>carrying a Blue Badge holder. This would be of benefit only to the 3.2% of trips taken by disabled people which are in taxis or PHVs (this data is shown in Section 3).</p> <p>Disabled people who do not drive or rely on motor vehicles could be impacted by the exemption policy if local traffic rises. This could make streets more unsafe, and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the low traffic neighbourhoods.</p>	

Race or ethnicity	Positive	<p>Positive:</p> <p>As the Islington Transport Strategy notes, “Children from black and minority ethnic backgrounds are one and a half times more likely to be killed or seriously injured in a road collision than children from other backgrounds”. The reduction of traffic volumes and road danger in the LTN should make cycling a more accessible transport mode among BAME people who are underrepresented among people who cycle for transport and for exercise.</p>	<p>Positive:</p> <p>The council can promote walking and cycling through its Active Travel programme.</p> <ul style="list-style-type: none"> • by providing free cycle skills sessions to adults and children; • through the STARS programme which works with schools to enable healthier school travel; • by working with TfL and private companies to provide cycle hire; • through Try Before You Bike, an affordable bike purchase scheme for adult bikes, child bikes and cargo bikes, including an option for businesses
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Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			to purchase e-cargo bikes at a discount.
Religion or belief (include no faith)	Neutral	No specific impacts identified.	n/a
Gender and gender reassignment (male, female, or non-binary)	Neutral	No specific impacts identified.	n/a

<p>Maternity or pregnancy</p>	<p>Positive and Negative</p>	<p>Positive:</p> <p>Reduced volumes of traffic and speeds in low traffic neighbourhoods will create a less stressful environment, supporting a healthy pregnancy.</p> <p>Parents and carers with prams will benefit from a better walking environment and reduced traffic flows when crossing roads, especially in the vicinity of schools. This includes the improvements made through the emerging people-friendly pavements project, which will remove existing barriers, reduce clutter and improve maintenance.</p> <p>Parents or carers who use cycles or cargo cycles for family mobility will benefit from traffic filtering and reduced volumes of traffic. Road closures will be designed in a way that is permeable and accessible to larger cycles. It is anticipated that increased safety for people who are cycling will help to empower more parents and carers to use cargo cycles for family mobility.</p> <p>Traffic filters will create informal play space for children specifically around closure locations, where there will be very low traffic following implementation.</p> <p>Pregnant people and unborn children in particular may be adversely impacted by air pollution. LTNs are expected to reduce traffic volumes and congestion on Islington roads, which is expected to contribute to improved air quality on these streets.</p> <p>Negative:</p>	<p>Positive:</p> <p>The council can promote walking and cycling through its Active Travel programme.</p> <ul style="list-style-type: none"> • by providing free cycle skills sessions to adults and children; • through the STARS programme which works with schools to enable healthier school travel; • by working with TfL and private companies to provide cycle hire; • through Try Before You Bike, an affordable bike purchase scheme for adult bikes, child bikes and cargo bikes, including an option for businesses
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		<p>Although access to all addresses is maintained as part of LTN schemes, pregnant people and those with young children may rely on private cars, private vehicles for hire, or taxis more for their local trips and so may be inconvenienced by longer journeys. Longer journeys may also involve higher costs.</p> <p>Pregnant people or parents/carers with young children may have reduced mobility, take longer to cross the road, be more vulnerable to traffic collisions and/or be more reliant on car transport, therefore they may be particularly impacted if schemes result in increased traffic and congestion on streets they live on. Pregnant people and unborn children may be particularly impacted by poorer air quality which may result from increased traffic and congestion on their streets.</p> <p>Pregnant people or parents/carers with young children who do not drive could be impacted by the exemption policy if local traffic rises. This could make streets unsafe, and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the LTNs.</p> <p>Pregnant people or parents/carers with young children could also be disproportionately impacted by the introduction of new street furniture and infrastructure (such as signage or cycleway wands) which may affect their accessibility if infrastructure is not suitably positioned.</p>	<p>to purchase e-cargo bikes at a discount.</p> <p>Negative:</p> <p>Monitoring traffic levels after implementation of the exemption policy to ensure traffic is kept at low levels. If traffic increases significantly, a review of exemptions would take place.</p> <p>Ensure signage is appropriate at camera-enforced filters.</p>
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Sex and sexual orientation	Neutral	<p>Positive:</p> <p>Women - who are more likely than men to be moving through public space with pushchairs and prams, and expectant mothers and mothers with young children - may also particularly benefit from improved walking and cycling conditions and reduced traffic levels. This includes the improvements made through the people-friendly pavements project, which will remove existing barriers, reduce clutter and improve maintenance.</p> <p>In London, women are less represented than men in cycling, and lack of safe cycle infrastructure disproportionately impacts women, attributable in part to a more risk averse attitude to mixing with traffic. Reduced traffic and new cycle infrastructure will benefit and empower more women to cycle.</p> <p>Negative:</p> <p>Some women might feel less safe at night walking than driving, and the LTN restrictions might make local routes longer.</p>	<p>Negative: St Peter's monitoring data does not suggest the LTN has had a negative impact on ASB and crime, however perception of safety and insecurity can deter people from using active travel modes. The council will investigate improving the public realm in ways which could deter the potential for crime, and to make areas feel subjectively safer. These public realm improvements could include improving sightlines for people walking and introducing new or improved public lighting. In addition the council is committed to work with its Community Safety Team and the Metropolitan Police to</p>
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Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			make Islington's streets safer.
Marriage or civil partnership	Neutral	No specific impacts identified.	n/a

Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Other Age (e.g. elderly) (e.g. people living in poverty, looked after children, people who are homeless or refugees)	Choose an item.	No specific impacts identified.	n/a

<p>Socio-economic status (To be treated as a Protected Characteristic under section 1 of The Equality Act 2010)</p>	<p>Positive and Negative</p>	<p>Positive:</p> <p>Busier roads can, in some areas, dominate more deprived communities. Walking and cycling improvements will benefit those living near busy roads and collision hot-spots when they are moving around their local area. Islington is an extremely diverse borough and the index of deprivation across the borough shows that deprivation does not strictly follow main roads. One of the key findings of a 2021 paper on the interaction of socio-economic status and LTNs is that “Across London as a whole, people in the most deprived quarter of OAs [output areas, administrative areas containing around 300 residents] were 2.7 times more likely to live in a new LTN, compared to Londoners in the least deprived quarter” (source).</p> <p>Generally, car ownership correlates to household income in London. Therefore, less affluent households are less likely to own a car – and be reliant on walking, cycling and public transport. The low traffic neighbourhoods in the PFS programme aim to benefit people who do not own cars by making it easier for them to travel by other modes.</p> <p>Although the cost of motoring over the past ten years has risen at a lower rate than the cost of living (and significantly lower than rises in public transport costs) (source) it is estimated that owning and running a car in the UK costs around £3,900 per household annually (source). There is clearly a benefit to those who are economically disadvantaged if LTNs reduce this cost burden, by removing the perceived need for a motor vehicle once other options become more attractive.</p>	<p>Positive:</p> <p>The council can promote walking and cycling through its Active Travel programme.</p> <ul style="list-style-type: none"> • by providing free cycle skills sessions to adults and children; • through the STARS programme which works with schools to enable healthier school travel; • by working with TfL and private companies to provide cycle hire; • through Try Before You Bike, an affordable bike purchase scheme for adult bikes, child bikes and cargo bikes, including an option for businesses
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	<p>Finally, the greater connectivity via new cycling and walking routes should support social distancing whilst providing better healthy access to employment.</p> <p>Negative:</p> <p>There might be lower income residents who use a private car, for instance for work, and might be impacted by longer journeys and higher fuel costs.</p> <p>However evidence shows that lower-income households are less likely to have access to private cars and tend to be more represented amongst bus passengers. This means that any displacement of traffic onto main roads which affects bus journey times could disproportionately impact people on lower incomes. Should any traffic displacement occur, it could also have a disproportionately negative impact on some of Islington’s more deprived communities, with consequences in terms of congestion, severance and air quality. However, as noted in the positive impacts, “people in the most deprived quarter of OAs [output areas, administrative areas containing around 300 residents] were 2.7 times more likely to live in a new LTN, compared to Londoners in the least deprived quarter.”²⁰ This means that any increase of traffic volumes within LTNs as a result of the new exemption policy could disproportionately impact some of Islington’s more deprived communities.</p> <p>Purchasing and maintaining a cycle is significantly less expensive than the comparable costs for motor vehicles, and can be cheaper than public transport fares.</p> <p>Nonetheless, people with less disposable income may be less able to own a cycle than those with more disposable income. This in turn would mean they would not</p>	<p>to purchase e-cargo bikes at a discount.</p> <p>Negative:</p> <p>Steer’s journey time analysis study shows that shorter car journeys are the most affected by LTNs, and whilst delays might occur, LTNs make cheaper transport options such as cycling more attractive by improving active travel conditions</p> <p>The council has a robust and comprehensive monitoring strategy to gather data on the displacement impacts on main roads including air quality data were possible. This data will be one of the factors to be considered carefully</p>
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		<p>have equal access to the new cycle infrastructure or not benefit so much from the improved cycling environment.</p>	<p>in deciding to transition to a permanent traffic order or to introduce mitigating measures.</p> <p>Air quality schemes are being rolled out in parallel, for instance the installation of Electric Vehicle Charging Points and the Ultra-Low Emission Zone extension from October 2021.</p> <p>The council has a programme to help with the affordability of maintaining and securely storing cycles. Islington's 'Try before you bike' scheme helps people purchase a new cycle with monthly payments (£20 for an adult cycle, £10 for children), with the</p>
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Characteristic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			option of returning the cycle and stopping payments if they choose to.

4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

Negative Impact	Action	Expected outcome	Governance and funding
<p><u>More inconvenient car trips</u></p> <p>More costly trips if taxis or private hire vehicles are relied on for some people falling into protected characteristics groups such as age, disability and parental status.</p>	<p>The London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired. This could offset some of the increase in costs resulting from slightly longer routes as a result of the LTN schemes. The council will work to promote uptake of this scheme amongst potentially affected groups.</p>	<p>Increased use of scheme amongst target participants</p>	<p>Transport Projects and people-friendly streets team to oversee</p> <p>London Councils provide funding</p>
<p><u>More inconvenient car trips</u></p> <p>The new exemption policy does not include taxis and private hire vehicles, doctors or carers.</p>	<p>The council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents.</p> <p>The exemption policy for Blue Badge holders is complemented by an exceptional circumstance</p>	<p>Both actions would result in an extension of the exemption policy to include more trips by disabled people.</p>	<p>Transport Projects and people-friendly streets team to oversee</p> <p>Transport for London and London Councils to help explore options</p> <p>TfL and London</p>

	dispensation which will benefit some people who do not meet the exemption criteria.		Councils provide funding
<p><u>Main roads impact</u></p> <p>Possible increase of bus journey times which would impact on older, disabled or lower income residents disproportionately.</p>	<p>The council has a robust and comprehensive monitoring strategy to gather data on the displacement impacts on main roads. This data will be one of the factors to be considered carefully in deciding to transition to a permanent traffic order or to introduce mitigating measures.</p> <p>If required and informed by monitoring data, the council will work with TfL to identify bus priority corridors to improve bus journey times. Bus priority schemes will be implemented in consultation with TfL to protect bus journey times if data demonstrates that there are increased delays in bus journeys for a sustained period.</p>	<p>If mitigations are required, they should lead to improving and more predictable bus journey times.</p> <p>Current monitoring data indicates that the boundary roads around St Peter's have seen a negligible change in traffic volumes overall, which is expected to remain stable in this new trial.</p>	<p>Transport Projects and people-friendly streets team to oversee.</p> <p>Traffic and Engineering team to liaise with Transport for London if mitigations are required.</p> <p>Funding to be sourced from TfL in the first instance and from council capital as a second resort.</p>

<p><u>Main roads impact</u></p> <p>Possible increase in air pollution on the main roads which would impact disproportionately on residents living on main roads</p>	<p>The council has a robust and comprehensive monitoring strategy to gather data on the displacement impacts on main roads including air quality data where possible. This data will be one of the factors to be considered carefully in deciding to transition to a permanent traffic order or to introduce mitigating measures.</p> <p>Air quality schemes are being rolled out in parallel, for instance the installation of Electric Vehicle Charging Points (EVCP) and the Ultra-Low Emission Zone (ULEZ) extension from October 2021.</p>	<p>If mitigations are required, they should be designed to improve air quality on main roads.</p> <p>Current monitoring data indicates that the boundary roads around St Peter's have seen a negligible change in traffic volumes overall, which is expected to remain stable in this new trial.</p>	<p>Transport Projects and people-friendly streets team to oversee, working with the Air Quality team and the Traffic and Engineering team.</p> <p>Funding to be sourced from TfL in the first instance and from council capital as a second resort.</p>

<p><u>Cost of a cycle</u></p> <p>Purchasing and maintaining a cycle is significantly less expensive than the comparable costs for motor vehicles, and can be cheaper than public transport fares. Nonetheless, people with less disposable income may be less able to own a cycle than those with more disposable income. This in turn would mean they would not have equal access to the new cycle infrastructure.</p>	<p>The council has a programme to help with the affordability of maintaining and securely storing cycles. Islington's 'Try before you bike' scheme helps people purchase a new cycle with monthly payments (£20 for an adult cycle, £10 for children), with the option of returning the cycle and stopping payments if they choose to.</p>	<p>These actions should lead to a wider uptake of the use of cycles.</p>	<p>Housing, Community development oversee elements of the cycle storage programme.</p> <p>Transport Strategy and Active Travel oversee public bike hangars and the 'Try before you bike' (TBYB) scheme.</p> <p>Cycle storage and TBYB are council-funded.</p>
<p><u>Street furniture</u></p> <p>People with restricted mobility could be disproportionately disadvantaged by the introduction of new street furniture and infrastructure (such as signage and cycleway wands) which may affect their accessibility if infrastructure is not suitably positioned.</p>	<p>The people-friendly pavement initiative will ensure impacts are minimised and accessibility improved in the public realm.</p> <p>Potential conflict to be minimised through the assessment of locations for proposed street furniture/ infrastructure to minimise and or eliminate negative impacts on accessibility.</p> <p>Engagement with disabled groups will also identify if there are outstanding issues with accessibility for people with restricted mobility.</p>	<p>Long-term outcomes are for a better public realm, with more people able to access and use footways and other spaces.</p>	<p>Transport Projects and people-friendly streets team will oversee, with works carried out by Traffic and Engineering.</p> <p>Section 106 and CIL can be used at ward level to improve accessibility on</p>

			<p>pavements and roads</p> <p>Highways maintenance programme can also contribute to improving accessibility</p>
<p><u>Traffic levels</u></p> <p>Traffic on local LTN streets rises as a result to the exemption policy.</p> <p>Benefits of the LTN are diluted, with worsening air and noise pollution, traffic danger, which will hinder uptake to active travel and the council's ambitions to achieve net zero carbon by 2030. Exempt vehicles might take people walking by surprise, which could result in collisions.</p> <p>This would impact in particular protected groups such as age, disability and parental status.</p>	<p>Monitoring traffic levels after implementation of the exemption policy to ensure traffic is kept at low levels. If traffic increases significantly, a review of exemptions would take place.</p> <p>Ensure signage is appropriate at camera-enforced filters.</p> <p>There might be no exemptions at traffic filters where there is a road danger such as lack of visibility.</p>	<p>Transport projects and people-friendly streets</p>	<p>Transport projects and people-friendly streets to oversee.</p> <p>Monitoring will be funded from the PFS budget.</p>

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5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

A specific consultation on the St Peter's LTN took place between 13 September 2021 and 11 October 2021. A full consultation report is appended to the delegated decision report (DDR) for these changes, and the DDR itself summarises elements of the consultation.

The introduction of the Blue Badge exemption policy was agreed in the council's [Executive Report](#) of 14 October 2021. This document, and its accompanying [resident impact assessment](#), contain more details on the engagement carried out to develop the policy.

In response to recent engagement since the publication of the Executive Report the council has simplified the application process by automating the granting of an exemption where possible for Blue Badge holders living within the St Peter's low traffic neighbourhood.

In response to the recent and historic engagement with disabled groups and individuals the council will be implementing an 'exceptional circumstance dispensation' which will involve a case-by-case consideration for individuals requesting exemption beyond the standard home LTN approach. The council recognises the need for this and will continue engaging with disabled groups and representatives on further developing this engagement route. There will also be a separate route to obtain an exemption to drive through a designated filter in an LTN in which the applicant does not live, through an exceptional circumstance dispensation. Details around the application processes and exact criteria will follow in due course.

In response to the recent engagement with disabled groups the council prioritised implementing the Blue Badge exemption in the two Highbury LTNs in advance of the consultation planned for early 2022. The council aims to implement the exemptions in other

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

LTNs as soon as is practically and legally possible, and implementation in the St Peter's LTN is the first stage of this roll-out.

In response to the recent and historic engagement with disabled groups with regards to the need for exemptions for disabled taxi users and disabled people who may not have Blue Badges, the council acknowledges that the implementation of this policy will not benefit those users and is limited. The justification and rationale for the exclusion of taxis is explained in more detail in section 3B of this EqIA.

The council will continue to engage directly with groups representing disabled people and disabled individuals as part of the wider people-friendly streets programme. Further feedback will be taken into account in a final decision on the experimental traffic order for the St Peter's LTN.



6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

Please provide details in the table below.

Action	Responsible team or officer	Deadline
Traffic volumes in the St Peter's LTN will be monitored and compared to the findings in the interim and pre-consultation monitoring reports.	Transport projects and people-friendly streets team.	Ongoing
The number of exemption permits issued will be monitored.	Transport projects and people-friendly streets team. Blue Badge team.	Monthly reports
Feedback from Blue Badge holders will be monitored.	Transport projects and people-friendly streets team. Blue Badge team.	Ongoing

Please send the completed EQIA to equalities@islington.gov.uk for quality checking by the Fairness and Equality Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Member	Name	Signed	Date
Staff member completing this form	Owen Powell		22/12/2021
Fairness and Equality Team			
Director or Head of Service	Martijn Cooijmans		22/12/2021