

# Delegated decision report of: Keith Townsend, Corporate Director of Environment

Officer Delegated Decision

Date: 9 November 2022

Ward(s): St Peter's and Canalside, St Mary's and St James'

Subject: St Peter's people-friendly streets (PFS) Low Traffic Neighbourhood (LTN) trial made permanent

# 1. Summary

- 1.1 The council's Transport Strategy and Vision 2030 Strategy were consulted on and adopted by the council's Executive in November 2020. Both strategies make the case for the introduction of measures aimed at enabling a reduction in motor traffic, enabling more people to walk, cycle and wheel and lead active lifestyles, reducing road danger and reducing the impact of transport on local air pollution and climate change.
- 1.2 The St Peter's low traffic neighbourhood (LTN) was implemented by an Experimental Traffic Order (ETO) on 3 July 2020 as part of the council's people-friendly streets (PFS) programme in response to the covid-19 pandemic, in line with the Transport Strategy and Vision 2030 Strategy.
- 1.3 This report sets out the decision and reasons to make the St Peter's LTN traffic order permanent following detailed monitoring and consultation demonstrating continues to meet its objective. The specific decision is detailed in Section 2.
- 1.4 On 14 October 2021, the council's Executive took a decision to introduce an exemption policy for Blue Badge holders which would be trialled in individual Low Traffic Neighbourhoods (LTNs) subject to future decision making. The background of the St Peter's LTN is set up in Section 3.
- 1.5 Monitoring has taken place at regular intervals since implementation in July 2020 and the results of the monitoring have been set out in Section 4 of this report.
- 1.6 A public consultation was held from 13 September to 11 October 2021. During the St Peter's consultation period, a number of engagement events were undertaken by consultants Steer in conjunction with council officers. These included: targeted residential and businesses door knocking to boost survey participation; on-street drop in sessions, an in-person disabled people drop-in session; and an online town hall Q&A event open to all residents. Statutory consultees have been also consulted throughout the scheme and notified about changes; feedback can be found in Section 5 of this report.
- 1.7 To enhance the LTN and make it a Liveable Neighbourhood as well as in response to the consultation, the council will continue to deliver more public realm improvements such as improvements to pavements as part of the people-friendly pavements programme and greening in collaboration with residents. More details on the future of the LTN can be found in Section 6 of this report.

## 2. Decision & Proposal

- 2.1 To agree to make the St Peter's LTN, as implemented by an ETO, permanent in its current iteration:
- 2.1.1 4 traffic filters with exemptions for STP permit holders: Colebrooke Row, St Peter's Street (junction with Wharf Road), Prebend Street, and Coleman Fields.
  - 2.1.2 1 traffic filter without exemption for STP permit holders at Danbury Street (cyclists' access only).
- 2.2 The proposals and the different types of filters is discussed in more detail in Section 3.

## 3. Background

- 3.1 The St Peter's LTN was introduced by an ETO in July 2020 with a 6-month period for formal objections and a public consultation in September 2021. Table 1 shows the key dates and activities relating to the St Peter's LTN including the traffic order changes and monitoring, as well as engagement and consultations dates.
- 3.2 The boundary roads of the St Peter's LTN are New North Road to the north, Essex Road and Upper Street to the west. Its southern boundary road is City Road, and its eastern boundary is Wharf Road and the Regents Canal, also sharing the borough boundary with Hackney.

<b>Date</b>	<b>Activity</b>
29 July to 29 September 2019	Transport Strategy consultation.
May 2020	Listening exercise via Commonplace to help inform people-friendly streets programme.
June 2020	Data collection for monitoring baseline.
July 2020	Introduction of first LTN in St Peter's by an Experimental Traffic Order (ETO).
November 2020	Council's Executive adopts both the Transport Strategy and Vision 2030 (NetZero Carbon) Strategy.  Data collection for interim monitoring.
February 2021	Interim Monitoring Report published.
March 2021	The St Peter's LTN trial feedback survey started.
June 2021	Data collection for pre-consultation monitoring.  ETO came into force to facilitate the relocation of the Prebend Street filter and introduction of the Coleman Fields filter.
13 September 2021	Pre-consultation monitoring report published.

	Public consultation started.
11 October 2021	Public consultation finished.
14 October 2021	The PFS programme was further committed to at the council's Executive, in order to continue the implementation of the PFS programme through specific schemes and agreed to trial the proposed approach to granting limited exemptions to Islington Blue Badge holders.
22 December 2021	Public consultation and engagement report published.
3 January 2022	New ETO came into force with the implementation of the Blue Badge exemption, and changes made to the traffic filters.
Mid-January 2022	Changes to the traffic filters included.
3 July 2022	End of the six-month objection period to new ETO.  Data collection for final monitoring.
September 2022	Additional data collection for final monitoring.
October 2022	Final monitoring report to be published.
November 2022	This delegated decision report agreed.

*Table 11: Key dates and activities in St Peter's LTN*

- 3.3 The results of the interim, pre-consultation and final monitoring reports highlight that the scheme is working well and meeting its objectives through its impacts on traffic volumes, traffic speeds, cycling levels, air quality, with no significant impacts on crime and anti-social behaviour (ASB) and emergency services response times.
- 3.4 As part of the Executive decision on people-friendly streets, in June 2020 the council committed to undertaking a formal consultation around 12 months after the implementation of each trial schemes. In the case of St Peter's LTN this was slightly delayed due to the changes made at Prebend Street and Coleman Fields to prevent drivers taking short-cuts through the Packington Estate. The delay of the consultation allowed some additional time for people to experience these changes and allowed the council to do more monitoring to understand how the changes affected local traffic levels. The first LTN was introduced in St Peter's in July 2020, when [Decision report](#) was signed.
- 3.5 The consultation took place between Monday 13 September 2021 and Monday 11 October 2021. Results from the consultation questionnaire have been analysed independently by Steer. A [pre-consultation](#) and [engagement reports](#) were published in December 2021. The consultation included an online and hard copy questionnaire, which received 1,489 responses, and 8 events were organised, including on-street events, door knocking, an online session and disabled people drop-in event.
- 3.6 In October 2021, [the Blue Badge Exemption policy](#) was introduced to offers an exemption to Blue Badge holders who live inside a low traffic neighbourhood (LTN) in Islington (including properties on the LTN side of the boundary roads). The exemption will only apply for the designated traffic filters within a single LTN. Blue Badge

holders who have access to a single vehicle that is used for their transportation will be eligible. The vehicle could belong to the Blue Badge holder, or to a carer (who could be a friend or family member). The vehicle will be able to pass through the designated traffic filters, when the Blue Badge holder is in the vehicle, without receiving a penalty charge. This will help disabled people who rely on their vehicles for short local journeys.

3.7 A [Decision report](#) was signed off by the Corporate Director of Environment on 22 December 2021 including the introduction of the Blue Badge exemption policy under permit 'STP' and filter changes to accommodate new exemptions. As of September 2022, 181 Blue Badge holders are exempt from the restrictions. These required the following civil works and measures:

- The removal of width restriction and installation of an additional planter at Colebrooke Row and St Peter's Street filters.
- At Prebend Street and Coleman Fields filter, planters have been re-aligned to allow 5m gaps for bi-directional vehicular movement;
- The revocation of ETO 2021/085 for the Loading Bay at Basire Street.

## 4. Monitoring

4.1 Comprehensive and robust monitoring forms part of the PFS programme to measure the impacts of interventions on cycle and motor traffic movement. The impacts of schemes on safety and security as well as environmental factors such as air quality have been measured. Monitoring also allows the council to track how each scheme is performing: these include the reduction of motor traffic volumes (which in part will contribute to net zero carbon objectives), a reduction in the number of speeding vehicles (to reduce road danger) and an increase in cycling (to meet public health aims and reduce obesity rates). The results of any monitoring are here considered as part of the decision-making process on the St Peter's LTN measures.

% change	Interim	Pre-consultation	Final
	November 2020	June 2021	Jul / Sep-22
<b>Internal road traffic volumes (normalised)</b>	-57%	-56%	-59%
<b>Boundary roads traffic volumes (normalised)</b>	-2%	-1%	+6% *
<b>Difference in average speeds in % on internal roads</b>	-8.0%	-9.0%	-9.9%
<b>Internal cycling volumes</b>	0%	+72%	+112%
<b>Notes</b>			
* City Road was excluded from the overall figure as the final count was taken on a different month, in September 22 instead of July 2022. The average including City Road would be -4%)			

Table 2: Comparison of monitoring data with baseline 2020.

- 4.2 Baseline data was collected before implementation of the LTN in June 2020 and again collected in November 2020 to produce an [‘interim monitoring report’](#). Pre-consultation monitoring data was collected in June 2021 to produce a [‘pre-consultation monitoring report’](#); and final monitoring data for a **‘final check’** was collected in July and September 2022 to monitor the impact of filter changes and the Blue Badge Exemption. The highlight results can be seen in Table 2.
- 4.3 Additionally, the monitoring reports assessed the impact of the LTN on the response times of the London Fire Brigade and on anti-social behaviour and crime rates. The interim and pre-consultation reports found that there had been no significant impact on London Fire Brigade response times, or on anti-social behaviour and crime rates. The final monitoring report did not assess these impacts although no adverse reports were received.
- 4.4 Throughout the scheme, all monitoring reports assessed the impact of the LTN on the air quality, where data showed that overall changes in levels of NO<sub>2</sub> in St Peter’s were lower than the previous years at all sites where comparable data was available from 2019. This also reflected that average annual NO<sub>2</sub> levels in St Peter’s were within the annual objective level of 40µg/m<sup>3</sup> at all sites.
- 4.5 The ‘final check’ or final monitoring data compares June 2021 to July 2022. Data was collected in July and September 2022 confirmed that the scheme continues to operate effectively against its goals, with no major impact from the exemptions granted to Blue Badge holders and the changes to filters when comparing with the pre-consultation data collected in June 2021. The key monitoring headlines when comparing June 2021 and July 2022 are:
- 4.6 **Internal roads:**
- Reduced motorised traffic by -22%
  - Increased levels of cycling by +10%
  - Negligible reduction on the average speed by -2%
- 4.7 **Boundary roads:**
- Negligible reduction of motorised traffic by -6%
  - Increased level of cycling by +22%
  - Negligible reduction on the average speed by -1%.
- 4.8 Final average speed at New North Road and City Road was 20.3mph with a negligible reduction of average speed of 0.6mph. Essex Road was 17.5mph, with a negligible increase of 0.7mph. When comparing September 2022 with June 2021 data, City Road has seen a reduction of traffic volumes (-23%).
- 4.9 It should be noted that there were some increases in traffic on three internal roads: Rector Street (+611), Canon Street (+393) and Prebend Street (south) (+1,130). However, this is in contrast with traffic volumes reductions at Basire Street (-2,154) and Prebend Street North (-2,142). This relocation of local traffic probably indicates that the number of vehicles

accessing the area via New North Road has decreased during the period between June 2021 and July 2022, whilst local access via Essex Road and Upper Street probably increased. This could be as a result of the changes to the traffic filters made in June 2021 impacting how local people access the area by car, as well as the impact of exempt vehicles entering via Packington Street and passing the Prebend Street filters direct to their destinations which should be considered as well.

- 4.10 In order to address previous recorded traffic increase on Charlton Place and Greenman Street, the council has been working on sub-schemes within the St Peter's LTN area to address traffic volume, accessibility and road danger, such as: Charlton Place, Greenman Street and Popham Road.
- 4.11 The full final monitoring report is available at Appendix 3.
- 4.12 In January 2022 and in order to accommodate the new Blue Badge exemption, changes were made at certain filters. As of September 2022, 181 Blue Badge holders are in possession of the STP permit.
- 4.13 Compliance data comparing the difference in PCNs issued at each filter each month in 2022, compared to the 12-month average from each site in 2021 shows that since the introduction of the Blue Badge exemption, at these locations the PCNs issued have increased since February 2022. The number and pattern of PCNs issued at Colebrooke Row and St Peter's Street filters suggest that removing the width restriction has led to an increase in vehicles passing through the filters. However, despite the increase in PCNs peaked at Colebrooke Row in February 2022, the month after the changes were implemented, there has been a steady downward trend in PCNs (and upward trend in compliance) since then. Similarly, Coleman Fields filter has been showing steady downward trend in PCNs after a peak in April 2022. Prebend Streets filter trend has fluctuated since changes were implemented. The St Peter's Street filter had issues with enforcement between February and May 2022; and Coleman Fields and Prebend Street filters had issues due to vandalism between August and September 2022.
- 4.14 The council has also worked with TfL to analyse bus journey times data. In general most of the roads have not seen a significant disruption in bus journey times during traffic peaks. An exception to this is Essex Road which has shown increased journey times since the start of the LTN. It is not possible to separate the impact of this scheme from other traffic and transport changes in the wider area. Nonetheless, the council's transport strategy committed to working with transport for London to improve bus reliability and achieve and increase in bus speeds. Therefore, the council will prioritise this road for bus priority schemes as set out in paragraph 6.7.
- 4.15 Table 3 highlights where there is evidence from the final monitoring results that the trial has achieved the objectives.

Policy	Scheme Objective	Evidence from final monitoring data (comparing June 2020 to July 2022)
<p><b>Islington Transport Strategy</b></p> <p>Objective Three: Cleaner and greener. To contribute to the council's commitment to Islington becoming net zero carbon by 2030, to improve air quality, and protect and improve the environment by reducing all forms of transport pollution.</p> <p><b>Vision 2030: Creating a Net Zero Carbon Islington by 2030</b></p> <p>Priority 3: Reduce emissions in the borough from transport. We will reduce vehicular emissions by encouraging walking, cycling and public transportation.</p>	<p>Reduce motorised traffic and vehicle emissions across internal roads, aimed to improve air quality.</p>	<p>Overall, <b>motorised traffic volumes on internal roads have decreased by an average of 59%</b>.</p> <p>The greatest decrease has been on <b>Prebend Street (North)</b> where there was a <b>94% decrease</b> when comparing 2020 and 2022 data.</p> <p>Air quality data from within the St Peter's area, shows that nitrogen dioxide levels have fallen in line with borough trends.</p> <p>NO2 levels are lower in 2021 at the six sites where data is available for 2019. Those sites are City Road, Duncan Street, Greenman Street, Noel Road, Prebend Street and the Regent's Canal.</p>
<p><b>Islington Transport Strategy</b></p> <p>Objective Three: Cleaner and greener. To contribute to the council's commitment to Islington becoming net zero carbon by 2030, to improve air quality, and protect and improve the environment by reducing all forms of transport pollution.</p>	<p>Reduce motorised traffic overall across internal and boundary roads.</p>	<p>Across the <b>boundary roads, total volumes of motorised traffic show a negligible change (6% fall)</b>. On average, motorised traffic volumes have changed on:</p> <ul style="list-style-type: none"> <li>• Essex Road by +3%</li> <li>• New North Road by +8%</li> </ul>
<p><b>Islington Transport Strategy</b></p> <p>Objective One: Healthy. To encourage and enable residents to walk and cycle as a first choice for local travel.</p> <p><b>Vision 2030: Creating a Net Zero Carbon Islington by 2030</b></p>	<p>Increase levels of walking and cycling across internal roads.</p>	<p><b>Cycling has increased by 112% on the internal roads.</b></p> <p>The greatest increase has been on <b>Charlton Place</b>, which has seen a <b>187% increase in cycling</b>.</p>

Policy	Scheme Objective	Evidence from final monitoring data (comparing June 2020 to July 2022)
Priority 3: Reduce emissions in the borough from transport. We will reduce vehicular emissions by encouraging walking, cycling and public transportation.		
<p><b>Islington Transport Strategy</b></p> <p>Objective Two: Safe. To work with the Mayor of London to achieve “Vision Zero” by 2041, by eliminating all deaths and serious injuries on Islington’s streets and reducing the number of minor traffic collisions on our streets.</p>	Reduce road danger and the levels of speeding on internal roads	Across <b>internal roads, average speeds have decreased by 9.0%.</b>

Table 32: Assessment of benefits

## 5. Consultation and Statutory Consultees

- 5.1 Throughout the scheme, the council has been actively engaging with residents, businesses, and other stakeholders to gather feedback on the people-friendly street schemes that have been introduced. Ahead of the public consultation, the methods used to engage have included the Commonplace interactive tool; emails sent directly or forwarded on to the PFS mailbox and responded to; trial feedback surveys for each scheme; and through formal objections which can be submitted during the six-month period after a scheme has been introduced.
- 5.2 Statutory pre-implementation consultation on the proposal presented for decision in this report has been undertaken with the following statutory stakeholders: London Ambulance Service (LAS), London Fire Brigade (LFB), the Metropolitan Police Service (MPS), the NHS Blood and Transplant Service, the Road Haulage Association, the Freight Transport Association (Logistics UK), TfL Network Management, TfL Buses, Royal Mail, Emily Thornberry MP (Islington South), Sem Moema AM (GLA).
- 5.3 Each stakeholder was contacted on 13 December 2021, provided with designs for the proposed changes, and asked for their feedbacks. Statutory consultees were consulted again on 11 October 2022 about the council’s intention to make the traffic order permanent. Feedback has been summarised here:
- MPS, LFB, and NHS Blood have no objections to this proposal.
  - LAS have no objections to this proposal. Traffic orders reflecting the general wording for emergency vehicle exemptions have been requested.

- A meeting was held with the TfL network performance officer group on 7 November 2022 to share monitoring results and to discuss the scheme being made permanent. Further to this meeting, the council will be exploring bus priority schemes on Essex Road see paragraph 6.9.
  - No response was received from the Road Haulage Association, the Freight Transport Association (Logistics UK), TfL Buses, Royal Mail, Emily Thornberry MP (Islington South), Sem Moema AM (GLA).
- 5.4 The council will continue to monitor and review the scheme with the Emergency Services after implementation and make any changes required.
- 5.5 The council has received 2 objections to the ETO which began on 3 January 2022. The objection period closed on 3 July 2022. Appendix 5 presents a table with the objections' themes and an officer response for each theme.
- 5.6 The table 4 below presents an assessment of the changes implemented since January 2022 by comparing it with the monitoring report and summary of findings.

Changes made in January 2022	Monitoring report and summary of findings	Commentary
Blue Badge exemption	<p>Unlike previous reports, which were aimed at determining the impact of the LTN scheme compared to the pre-implementation baseline, the purpose of the Final Report for the St Peter's LTN scheme is to serve as a <b>"health check"</b> on the scheme roughly one-year on from the pre-consultation stage of data collection. The report looks to understand how the scheme is bedding in now with the implementation of the exemption policy for local Blue Badge holders and the changes made at filters, and how it is likely to affect long term transportation trends in the area.</p> <p>As in October 2022, there are 181 Blue Badge</p>	<p>The council recognises some disabled people may rely on motor vehicles for their journeys and that the LTN could be resulting in longer journey times for them, having an impact on their lives. As a result, the council introduced a new exemption policy for Blue Badge holders which may help to mitigate against longer journey times or distances for eligible residents in January 2022.</p> <p>The Blue Badge exemption policy was amended, so that Blue Badge holders could nominate a vehicle not registered at their address to receive their STP permit; this meant that the STP permit could be registered with a carer or friend who supports the disabled person.</p> <p>Monitoring data from the most recent traffic counts in July and September 2022 shows that whilst there have been some small increases in traffic volumes on specific roads, these tend to represent rebounds after large drops from the baseline – and that in general, the Blue Badge exemptions policy implemented between the pre-consultation and final counts</p>

	holders who are in possession of the STP permit.	has not materially impacted the scheme's success.  Overall, when comparing data from 2020 to the most recent data, the St Peter's LTN is meeting its objectives.
Physical changes at Colebrooke Row and St Peter's Street filters; an increase in traffic volume at Prebend Street and Coleman Fields filter.	<p>At Colebrooke Row there has been an 8% increase of traffic volumes between the pre-consultation monitoring in June 2021 and the counts taken in July 2022. However, when comparing with the baseline pre LTN in June 2020, there has been a significant reduction of motorised traffic volume of 51%.</p> <p>At St Peter's Street there has been an 11% increase of traffic volumes between the pre-consultation monitoring in June 2021 and the counts taken in July 2022. However, when comparing with the pre-LTN baseline in June 2020, there has been a significant reduction of motorised traffic volume of 39%.</p>	<p>The monitoring data at these locations suggests that the changes at those filters and that the Blue Badge exemption have not impacted the scheme's success.</p> <p>The council will keep it under review and make improvements subject to changes in compliance data.</p>

Table 4: Assessment of changes.

## 6. Developing a Liveable Neighbourhood for St Peter's

- 6.1 While the intention of this report is to make the St Peter's LTN permanent, this by no means suggests that there will be no further investment in the area.
- 6.2 It is the council's ambition to return to all LTN areas that are made permanent and implement wider public realm improvements that will make the areas liveable neighbourhoods.
- 6.3 To develop a borough-wide network of liveable neighbourhoods, the borough was divided into sub-areas. The council expects all the sub-areas across the borough to be

developed into liveable neighbourhoods by 2030. Phase 1 of the liveable neighbourhoods programme implementation focuses on existing LTNs that have already been delivered as part of the PFS programme. This phase includes schemes implemented as Covid-19 emergency response, which focused on the implementation of traffic measures in LTNs. The St Peter's LTN forms part of this first phase.

- 6.4 To enhance the LTN and make it a Liveable Neighbourhood as well as in response to the consultation, the council will continue to explore more public realm improvements such as improvements to pavements as part of the people-friendly pavements programme and greening in collaboration with residents.
- 6.5 **The people-friendly pavements** programme was launched in 2021 and aims to make Islington's pavements more accessible through introducing measures such as footway repaving, dropped kerbs, improved foliage maintenance, tactile paving and street clutter removal. The council's ambition is to implement a series of people-friendly pavements improvements in all existing LTNs as well as future liveable neighbourhoods. Locations for improvements are identified by carrying out an audit of streets in each ward, liveable neighbourhood or existing low traffic neighbourhood. The accessibility audit for St Peter's has been commissioned and footpath improvements at Popham Street has been identified as priority for implementation by the end of 2022.
- 6.6 Moreover, invest in main road improvements will continue, particularly focusing on junctions to reduce road danger and improve conditions for walking and cycling, as well as exploring any further speed reduction measures. This will be of particular benefit to pedestrians, especially those that are more vulnerable when using the pavement.
- 6.7 In September 2022 the council delivered additional planters on along New North Road, increasing greening opportunities as well as addressing an issue relating to mopeds using the area as shortcuts. This has been included as part of the **Greener Together** programme. Moreover, the council will continue to explore more greening improvements in collaboration with residents.
- 6.8 The council will continue to address any instances of mopeds mounting the pavements to avoid camera enforcement through additional monitoring, enforcement and further education and engagement with offenders.
- 6.9 The council is committed to continue to work with TfL and the bus operators to implement measures to prioritise bus journeys particular on the boroughs' main roads and busy bus corridors. Monitoring data from TfL has shown an increase in average journey times on Essex Road over the past two years – the council will therefore work to improve bus journey times on Essex Road by exploring prioritisation measures such as the removal or relocation of existing parking, additional double yellow lines, bus lane expansion, and bus lane time review. The council will begin the feasibility study for this project in financial year 23/24.

## 7. Implications

## Financial implications:

### Costs

- 7.1 The cost to make the St Peter's LTN permanent will be £450 which is the cost to advertise the order being made permanent.
- 7.2 The scheme is funded through the people-friendly streets Capital programme budget. In February 2021 the council approved the capital budget of £3.840m for Low Traffic Neighbourhood schemes for 2021/22 - 2023/24.

### Revenue

- 7.3 There is no loss of revenue anticipated with the making permanent of the St Peter's LTN.
- 7.4 The parking account is a ring-fenced account with any surplus generated from its activities invested in highways and transport related activities. Income received will be allocated to the ring-fenced parking account, with the level of income dependent upon the level of compliance. The impact of this will be modelled as part of the medium-term financial planning process.
- 7.5 The camera-enforced closures used in the St Peter's LTN are anticipated to continue generating some enforcement income within the parking account.
- 7.6 Financial modelling of the various options indicates that the overall revenue streams under the LTN programme will be able to achieve the current School Streets and Lorry Control MTFS model over the 2020-23 MTFS period. There will be reductions in income in later years as compliance increases and this will need to be considered as part of future MTFS planning. Currently seven enforcement cameras (at four locations) enforce the no motor vehicle restrictions in the St Peter's LTN. The revenue from these cameras will continue to contribute to the overall parking revenue targets.

## Legal Implications

- 7.7 The Council implemented the St Peter's LTN using Experimental Traffic Orders (ETO's) made under Section 9 of the Road Traffic Regulation Act 1984 (the "1984 Act"). An experimental traffic order may not last longer than 18 months.
- 7.8 In the exercise of its powers under the Road Traffic Regulation Act 1984, the council is required, under section 122 of the 1984 Act, to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off street, whilst at the same time have regard to the following considerations:

- a) The desirability of securing and maintaining reasonable access to premises;
- b) The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles to preserve or improve the amenities of the areas through which the roads run;
- c) The impact on air quality both locally and in the surrounding areas;
- d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- e) Any other matters appearing to the council to be relevant.

- 7.9 In balancing the considerations above, officers consider that replacing the existing ETOs with permanent traffic orders, making the St Peter's LTN as permanent, should proceed for the following reasons:
- 7.10 Access, including for motorised traffic, is maintained to all residential and other properties, albeit access routes for motorised traffic (except for emergency services vehicles) may change, which may cause inconvenience to some residents.
- 7.11 All local amenities remain accessible, albeit routes for motorised traffic (except for emergency services vehicles and eligible Blue Badge holders who live in the St Peter's LTN) to access these amenities may change. The area will continue to benefit from the reduction of through movements of motorised traffic (except for emergency services vehicles and eligible Blue Badge holders who live in the St Peter's LTN), including heavy commercial vehicles, and thereby a significant improvement to the amenity of the area.
- 7.12 The reduction of through-traffic in the St Peter's LTN is expected to improve air quality on the local streets within the LTN. It is expected that despite the exemptions being introduced there will still be a significant reduction in traffic volumes in the area and air quality benefits. Other measures, such as the council's introduction of Electric Vehicle Charging Points, the introduction of the Ultra-Low Emission Zone and recent extension in October 2021 (which covers the whole of Islington) and the introduction of School Streets, are likely to contribute to improving air quality.
- 7.13 There is a need for public service vehicles responding to emergencies to be able to access the area safely and expeditiously. The revised St Peter's LTN will maintain emergency service vehicles the ability to respond to an emergency without restriction or delay.
- 7.14 By Section 16 of the Traffic Management Act 2004) local traffic authorities must: manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and the following objectives:
- a) securing the expeditious movement of traffic on the authority's road network; and
  - b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- 7.15 The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing—

- c) the more efficient use of their road network; or
- d) the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority; and may involve the exercise of any power to regulate or co-ordinate the uses made of any road (or part of a road) in the road network ...”

7.16 “Traffic” includes pedestrians.

7.17 Once an ETO is in place, any person may object to the making of the ETO becoming permanent within a period of six months beginning with the day on which the ETO comes into force or, if the ETO is varied by another order or modified pursuant to section 10 of the 1984 Act, beginning with the day on which the variation or modification or the latest variation or modification comes into force. Objections received must be considered before any permanent order is made.

7.18 The Local Authorities’ Traffic Orders (Procedure) (England and Wales) Regulations 1996 set out the procedures for making an ETO permanent.

7.19 These functions are functions within section 149(1) of the Equality Act 2010 attracting the duty to have “due regard” to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.20 This is dealt with in the Equalities Impact Assessment (EQIA) (Appendix 3) and this assessment is summarised below in section 9.4.

7.21 Regard should be had to the provisions of the Human Rights Act. In particular, the provisions of Article 1, of the First Protocol protection of property, Article 2, right to education and Article 8, right to respect for private and family life.

7.22 In relation to Article 1 some residents may no longer be able to use the most direct access to their homes. However, under the operation of these schemes, alternative access will be in place. Further, the right under Article 1 is qualified rather than absolute as it permits the deprivation of an individual’s possessions or rights where it is in the public interest. The public interest benefits are outlined within this report.

7.23 In relation to Article 2, access to educational institutes will not be affected by the proposals. Access to local educational institutes will be maintained by all modes of transport.

7.24 In relation to Article 8, right to respect for private and family life has a broad interpretation and extends to being in a public place if there is a reasonable expectation of privacy there. This right can be interfered with where lawful, necessary and

proportionate to protect a number of other concerns including public safety and health. It is not considered that the implementation of the changes to the St Peter's LTN proposed in this report will impede on the right to individuals to respect for private and family life either in public or on private land. Further, the schemes are proposed in order to reduce the number of vehicles on the road, which will enhance public safety and health.

- 7.25 These human rights should be considered. To the extent that it is considered that they are infringed the schemes should only go ahead if it is considered that the infringement is necessary and proportionate.

## Environmental Implications and contribution to achieving a net zero carbon Islington by 2030

- 7.26 Continuing the St Peter's LTN as a permanent scheme and making active travel (including cycling) the easiest option are identified actions in the council's Vision 2030: Creating a Net Zero Carbon Islington by 2030. The intention behind the schemes is to reduce vehicular movements through LTNs during all hours, improving air quality by reducing harmful emissions like NOx and PM10s and to encourage residents and commuters to walk and cycle more by providing dedicated and largely segregated facilities. In some cases – such as where residents are coaxed out of their cars for short trips, or traffic “evaporates” due to the new restrictions – this will reduce traffic, emissions and congestion.
- 7.27 However, there may also be cases where motorists take longer routes, leading to additional emissions and congestion elsewhere, including on boundary roads of LTNs. On balance, it is expected that the overall emissions (including carbon emissions) and congestion will reduce on the roads within the schemes and surrounding areas as more residents and others are encouraged to travel by sustainable means of transport, including by other measures such as ULEZ.
- 7.28 The proposal makes the St Peter's LTN permanent. The LTNs are part of the council's commitment to working towards a zero carbon future and responding to the Climate Emergency. The delivery of the Islington Transport Strategy, Liveable Neighbourhoods, School Streets and Lorry Control Scheme were all specifically mentioned in the transport section of the Vision 2030: Creating a Net Zero Carbon Islington by 2030.
- 7.29 Making the St Peter's LTN permanent will have some direct environmental impacts as leaflets will need to be printed and distributed to residents to make them aware of the scheme becoming permanent. As no changes are planned to the LTN, there will not be any environmental impact from road works.
- 7.30 The impact on local emissions depends on whether the Blue Badge exemption led to an increase in the number of trips by exempted residents. The final monitoring results suggested the exemption has not had a significant impact on the LTN.

## Equalities Impact Assessment

- 7.31 The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 7.32 An Equalities Impact Assessment (EQIA) was completed for the amendments to the LTN featured in this report. The full EQIA is attached in Appendix 3 and is summarised below, along with summaries of the findings of resident impact assessments (RIAs) dated [23 June 2020](#) and [8 June 2021](#) which considered the impacts of earlier iterations of the St Peter's LTN.

## Positive impacts of whole scheme

- 7.33 By becoming permanent, the St Peter's LTN will continue to reduce road danger and improve accessibility and should provide benefits to all residents with protected characteristics. The measures should also reduce the negative impacts of traffic, improving air quality, and reducing injuries from road traffic collisions. The measures also contribute to the council's response to climate change by reducing emissions, adapting our streets to be more resilient to urban heat through greening, which can benefit older and younger people, as well as those living in flats. The design of the scheme has been developed with the aim to improve St Peter's streets as aligned with the healthy streets indicators. The following healthy streets elements will deliver benefits to St Peter's residents, businesses and visitors: enabling pedestrians from all walks of life, easier to cross the street, reduction in noise, empowering people to cycle and walk more safely, and reduced air pollution within the residential area.
- 7.34 Blue Badge holders who live within the St Peter's LTN and have access to a vehicle registered to their home address are benefitting from the exemptions at designated camera-enforced filters in the LTN where they reside. The future individual 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.
- 7.35 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 individual 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 policy. The positive impacts of LTNs on local traffic levels, as evidenced by interim monitoring reports, means less congestion for exempt vehicles.

- 7.36 The people-friendly pavements project will benefit people from all walks of life who walk, use wheelchairs or other mobility aids by removing existing barriers, reducing clutter and improving maintenance.

## Negative impacts of whole scheme

- 7.37 It is the purpose of the EQIA to also examine any negative impacts on residents, particularly those with protected characteristics to ensure that a robust mitigation plan is in place and so that these negative impacts can be taken into account in decision making on the implementation of the scheme.
- 7.38 Following the implementation of the changes to the St Peter's LTN scheme in December 2022, the whole area is still fully accessible to all vehicles traveling into the area. None of the measures being introduced will stop people (including residents, businesses, visitors or delivery drivers) from driving to and from the area. However, some routes may need to be changed by driving to and from the nearest main road rather than across local streets. The changes may result in increased inconvenience for some motorists and could result in longer journey times with an increased cost if private vehicle hire or taxis are relied on.
- 7.39 Whilst the purpose of LTN measures is to create a safer environment including to enable walking and cycling for people from all walks of life, this must be balanced with facilitating the travel requirements for vulnerable residents including those with disabilities and mobility impairments who may rely on cars to travel. The council will also investigate public realm initiatives to increase sense of safety on the streets, particularly at night, for instance with enhanced public lighting.
- 7.40 People with disabilities who rely on taxis and PHVs, carers who are not eligible for the Blue Badge exemption and doctors are not benefitting from the existing 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 LTN as they currently exist.
- 7.41 The programme-wide RIA also notes that "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 Number plate Recognition (ANPR), then the council will consider exemptions for taxis/PHVs for the purpose of 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" (p22).
- 7.42 A robust monitoring and mitigation plan are outlined in the Equalities Impact Assessment to address the negative impacts above, particularly with reference to how they impact people with protected characteristics. This includes continued engagement with people with protected characteristics and reviewing impacts of exemptions, specifically the volume of traffic travelling through the LTN areas.

## 8. Conclusion and reasons for recommendations

- 8.1 **Summary.** Monitoring of the St Peter's LTN showed that the scheme is working well and has met its objectives, covering road danger reduction, traffic reduction, the public health benefits of switching motor vehicle trips to active travel, and no negative impact on air quality, see Table 4. The monitoring data suggests that the changes at those filters have not materially impacted the scheme's success, Table 5 shows an assessment of the impact of the changes made in January 2022. Assessment of the most common negative themes and objections to the scheme shows that these objections are not supported by evidence or have been mitigated, for example, on the impact of the St Peter's LTN on the mobility of some disabled people, the council has proposed and implemented significant changes to the traffic orders and operation of the LTN to mitigate these impacts, see Table 6.
- 8.2 The continuation permanently of the scheme is recommended because there is clear evidence that the scheme is meeting its overall objectives as supported by monitoring and consultation results, and that potential negative impacts emerging from the objections are either not supported by monitoring data, are unrelated to the LTN, or have been mitigated through adjustments to the scheme.
- 8.3 **Recommendation.** The Corporate Director of Environment is asked to agree the proposals set out in this report, including making the St Peter's LTN trial permanent.
- 8.4 In making this decision, the Corporate Director of Environment needs to assess if the trial has largely achieved the objectives of the LTN and balance those benefits with the potential disadvantages that could be caused by making the scheme permanent with the Blue Badge exemptions in place. To assess this the monitoring data and objections received for the scheme are discussed below.
- 8.5 **Assessment of benefits.** The St Peter's LTN aims to encourage local people to walk and cycle in their neighbourhoods and to reduce motorised vehicle use. The environmental impacts of traffic will be reduced particularly on local residential streets. This will result in a safer, cleaner and healthier environment for local people particularly older people, children, younger people, people with impaired mobility and other vulnerable groups. These aims are supportive of the council's net zero carbon and the council's ambition of creating a more equal Islington for all. Table 5 highlights where there is clear evidence from the monitoring data and consultation results that the trial has achieved the objectives.
- 8.6 **Assessment of disadvantages.** The council committed to duly consider all feedback and objections received on the schemes and also monitor potential negative impacts of the scheme. In Table 5 the main changes to the scheme since January 2022 are put into context alongside the monitoring data gathered during the trial, and the objectives of the scheme.
- 8.7 In conclusion, the Corporate Director of Environment is asked to agree to make the St Peter's LTN trial a permanent scheme.

Signed by: Keith Townsend



Title: Corporate Director of Environment

Date: 9 November 2022

Report Author: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]  
[REDACTED]

Financial Implications Author: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]

Legal Implications Author: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]

Environmental Implications Author: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]

Appendix 1 – St Peter’s LTN map

Appendix 2 – Leaflet sent to residents

Appendix 3 – Equalities Impact Assessment

Appendix 4 – Final monitoring report