

## Appendix 6 – Response to Objections

The council received eight objections to the St Mary’s Church Low Traffic Neighbourhood (LTN) Experimental Traffic Order (ETO) during the six-month objection period. The main themes and number of instances the themes are raised in the objections are set out in Table 1. Responses to the objections are provided in Table 2.

**Table 1: Themes and number of instances of themes in St Mary’s Church objections**

Theme/Topic of Objection	Number of objections to St Mary’s Church mentioning this theme	Percentage of objections to St Mary’s Church that mention this theme
Scheme has caused an increase in pollution and/or traffic on main roads in the area	5	56%
Journey times are longer/more inconvenient	3	33%
I have not been consulted about my views on the scheme	2	22%
Businesses negatively impacted	2	22%
The scheme is unsafe for pedestrians/cyclists	2	22%
Disadvantages the elderly/disabled	2	22%
Scheme is poorly thought out/arbitrary/not evidence-based	2	22%
Scheme is negatively impacting mental health/well being	1	11%

Theme/Topic of Objection	Number of objections to St Mary's Church mentioning this theme	Percentage of objections to St Mary's Church that mention this theme
Residents should be granted ANPR exemptions/parking permit holder exemptions	1	11%
LTNs are not delivering the benefits envisaged	1	11%

**Table 2: Responses to St Mary's Church objections**

Theme/Topic of Objection	Officers' response
<p>Scheme has caused an increase in pollution and/or traffic on main roads in the area/traffic displacement</p> <p>Journey times are longer/more inconvenient</p>	<p><b><u>Scheme has caused an increase in pollution and/or traffic on main roads in the area</u></b></p> <p>Traffic data collected as part of the pre-consultation monitoring shows that total vehicle flows have decreased on boundary roads. Moreover, no single boundary road site recorded a significant (above 10%) increase in traffic flows, with four out of six sites recording decreases in traffic volumes.</p> <p>It is acknowledged that the St Mary's Church LTN includes two west-east through-routes (Canonbury Lane/ Canonbury Square) and Gaskin Street (one-way). There has been a significant increase in volume traffic on Canonbury Lane (35%, normalised) and Canonbury Square (57% normalised) - an increase of 1,907 and 1,266 vehicles a day (daily averages).</p> <p>The council will continue to monitor the traffic volumes at these locations. Neighbouring areas to the west of the St Mary's Church area currently permit east-west through movements which may contribute to the flows on Canonbury Lane/Square. Future people friendly streets (PFS) measures in neighbouring areas to the west of Upper Street, if implemented, may reduce the flow of east-west traffic, which may benefit these streets by reducing cut-through traffic.</p> <p>Data from the St Mary's Church pre-consultation monitoring report shows that there has generally been a moderate increase in the concentration of NO<sub>2</sub> between the two periods assessed. However, such increases measured within the PFS</p>

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	<p>area have generally been on-par or slightly less significant than those of the wider borough, and it is considered that most increases in NO2 levels outlined in the report are related to the post-COVID increase in activity (especially considering longer term improvements in air quality).</p> <p>The results generally suggest that the scheme has not had a significant impact on air quality to date, and that air quality across both the borough and the St Mary's Church PFS area has gradually improved where data is available. The final results for 2022 will be published later in the year as part of the council's annual air quality monitoring report.</p> <p><b><u>Journey times are longer/more inconvenient</u></b></p> <p>The objective of people-friendly streets is to reduce the overall number of trips, not to displace all traffic from local streets onto main roads. This will only happen if some car trips are replaced by walking, wheeling, or cycling. For some journeys, the filters make driving more inconvenient and are in this way designed to encourage those who do not need to drive to choose a different way to travel, especially for short trips.</p> <p>Every journey switched from driving to active travel removes a car from the road and leaves the roads clearer for people who have no other choice but to drive.</p> <p><b><u>Bus journey times on main roads</u></b></p> <p>Bus journey times are monitored by Transport for London (TfL) and can add an additional layer of understanding about the impacts of transport schemes.</p> <p>Analysis of bus journey time data in the St Mary's Church pre-consultation monitoring report shows that on Canonbury Road, journey times have remained largely at, or below pre-COVID levels. On Upper Street, bus journey times are slightly higher than pre-COVID averages but there is no clear change in bus speeds before and after the scheme introduction. A similar trend is observed on Essex Road, where journey times are higher than pre-COVID averages but there does not appear to be any direct impact from the scheme itself.</p>

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	<p>Nevertheless, the council is committed to working with TfL to improve bus journey times on Essex Road, which forms the boundary of multiple LTNs, by exploring bus prioritisation measures such as the removal or relocation of existing parking, additional double yellow lines, bus lane expansion, and bus lane time review. The feasibility study for this project will begin in financial year 2023-2024. The council is working with TfL to monitor the most recent (as seen in January 2023) increase in bus journey times on Upper Street.</p>
<p>I have not been consulted about my views on the scheme</p>	<p>The provisions of the experimental traffic order (ETO) process do not require public consultation prior to the start of the trial, although the council did in fact engage with the public before the start of the trial. In making the ETO, the council must follow the procedure set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (as amended by the Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020). It has followed this procedure, including consultation of relevant bodies.</p> <p>The council has also considered the application of relevant provisions of the Human Rights Act 1998 and the Equality Act 2010. It is not considered that the implementation of these ETOs will impede the rights of individuals.</p> <p>Section 9 of the Road Traffic Regulation Act 1984 enables the council to make ETOs to deliver our people-friendly streets schemes, prior to a public consultation. In deciding whether to make an order under section 9, the council must comply with the provisions of section 122 of the 1984 Act which requires the council to exercise that function (as far as practicable having regard to the matters specified below) 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 the highway. The specified matters are:</p> <p>(a) the desirability of securing and maintaining reasonable access to premises;</p> <p>(b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;</p>

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	<p>(bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy); (c) 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</p> <p>(d) any other matters appearing to the local authority to be relevant.</p> <p>The council has complied with Section 122, balanced the various considerations, and concluded that implementing the ETO is the appropriate decision.</p> <p>Further, when deciding whether to make a traffic order the Council must have regard to the Mayor of London's Transport Strategy (sections 142 and 144(1)(a) Greater London Authority Act 1999) and it has done so that strategy emphasises the importance of reducing emissions and improving air quality.</p> <p>Consultation was carried out on the Islington Transport Strategy (in 2019) and the net zero carbon strategy (in 2020). The former had made 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. The Islington Vision 2030 (Net Zero Carbon) Strategy is a response to the Climate Change Emergency that the council declared in June 2019, and it identifies the PFS programme as a significant contributor to delivering the transport priority of reducing vehicular emissions in the borough by encouraging walking, cycling and public transportation.</p> <p>Guidance from the Department for Transport issued in May 2020 stated that: "local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling ... Measures should be taken as swiftly as possible, and in any event within weeks, given the urgent need to change travel habits before the restart takes full effect." This meant that as well as there being no legal duty to carry out pre-implementation consultations, there was also no time. This guidance has subsequently been updated to: "As we emerge from the pandemic, local authorities should continue to make significant changes to their road layouts to give more space to cyclists and pedestrians and to maintain the changes they have already made"</p>

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	<p>A full public consultation was held on the St Mary's Church scheme (29 March to 26 April 2023) which included door to door business visits, resident door knocking, an online Town Hall meeting and a consultation feedback survey.</p> <p>This follows after a trial feedback survey was open from December 2021 to March 2023. A dedicated email inbox for the scheme was opened in October 2021, where residents, business owners or anyone with a connection to the area could write to the council and comment on the scheme.</p>
<p>Businesses negatively impacted</p>	<p>People-friendly streets (PFS) aim to ensure that transport improvements support local economic activity and growth. The PFS scheme is working closely with the council's Inclusive Economy team to aim to build a knowledgeable economy with fairness, shared prosperity, and social justice at its core. Maintaining shops and services within Islington contributes to the sustainability of local communities and the local economy, making them available to all and reducing the number and lengths of trips undertaken which is at the forefront of the PFS scheme.</p> <p>Access to all business addresses by motor vehicle has been maintained with the St Mary's Church LTN measures in place, but some access routes may have changed as a result of the scheme.</p> <p>During business visits carried out as part of the public consultation in March/April 2023, evidence was gathered particularly concerning businesses on Cross Street where issues were raised by businesses concerning parking, access and loading. The council will continue to engage and work directly with businesses within the LTN to support them where possible to make Islington cleaner, greener, healthier and more sustainable in the time of climate change.</p> <p>As part of the consultation process, businesses in the area were visited again in April 2023 to encourage owners to fill in the consultation questionnaire on behalf of their business.</p> <p>Many items to and from businesses could be delivered by cycle or cargo bike, and these vehicles are able to pass through any traffic filters that are installed as part of the Islington PFS programme. As well as being quicker for local trips, using cycles would also mean no extra costs to your business (like VED, fuel or insurance). Islington Council's Inclusive Economy</p>

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	<p>team is working closely with the people-friendly streets team to support Islington's businesses make green transitions.</p> <p>TfL has published some useful evidence in their 'Walking and cycling: the economic benefits (Source: <a href="https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf">https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf</a> ) which shows how walking and cycling can benefit businesses in London. For instance, walking and cycling improvements can boost retail sales by 30%.</p>
<p>The scheme is unsafe for pedestrians/cyclists</p>	<p>Road danger from traffic is a major contributing factor to unsafe conditions for walking, cycling or using wheelchairs - pre-consultation monitoring data shows that both speeds and volumes of traffic has fallen within the St Mary's Church LTN area.</p> <p>Results from the consultation questionnaire show that 44% of respondents say it is easier to cross the street (19% disagree) and 41% of consultation respondents said there is less speeding traffic since the trial began, (compared to 21% who said there is more speeding traffic).</p> <p>In addition to traffic calming measures, the council's October 2021 Executive Report on the people-friendly streets programme outlines the forthcoming 'people-friendly pavements' programme which will become another key element of the PFS programme. This programme will make Islington's pavements more accessible through improvements such as:</p> <ul style="list-style-type: none"> <li>• Footway repaving</li> <li>• Foliage maintenance</li> <li>• Additional dropped kerbs</li> <li>• Tactile paving</li> <li>• Street clutter removal</li> </ul> <p>Some responses to the St Mary's Church trial feedback survey that was open from before implementation of the trial until the consultation began, noted that cyclist behaviour and illegal moped driving on the pavement made them feel unsafe. However, it should be noted that pre-consultation monitoring shows that motorcycle volumes have decreased on internal roads from a daily average of 2,989 motorcycles to a daily average of 1,524 motorcycles overall. The council will continue to address the general issue of mopeds mounting the</p>

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	<p>pavements to avoid camera enforcement through additional monitoring, enforcement and further education and engagement with offenders.</p> <p>Others said they were concerned about an increase in street crime due to the implementation of the LTN and resulting traffic filters. Monitoring data shows that levels of crime and anti-social behaviour in the LTN area remain broadly in line with borough-wide trends. The council's Anti-Social Behaviour (ASB) team have found no evidence to suggest that the rate increased following the implementation of the LTN.</p>
Scheme disadvantages elderly/disabled	<p>There are many visible and less visible impacts of traffic on individuals health and quality of life, which often harm the most vulnerable residents: motor traffic can be dangerous, noisy, polluting and can discourage community interaction and healthy activity including walking, wheeling, cycling and play. Implementing LTNs can bring widespread benefits to society as a whole by making places safer, healthier and more attractive. LTNs help improve access to walking and cycling, particularly for older people and people with disabilities.</p> <p>The council has carried out an Equalities Impact Assessment (EqIA), sometimes referred to as Resident Impact Assessment (RIA), for the overall programme and for each individual scheme. The EqIA evaluates the impacts of the changes on people with different protected characteristics, which includes age and disability.</p> <p>Anyone who could previously access their home by motor vehicle, private car or taxi are still able to do so after the people-friendly streets neighbourhood was introduced as a trial. People who use walking aids, wheelchairs or mobility scooters will find the streets quieter, safer and more enjoyable with lower amounts of traffic, and fewer drivers using local roads for quick short-cuts.</p> <p>The council's people-friendly pavements programme aims to improve conditions for anyone walking (or using mobility aids, including wheelchairs) on pavements. We will provide additional dropped kerbs to make crossing the road easier, improve foliage maintenance and ensure level surfaces are kept clear of unnecessary obstructions. People with visual impairments will benefit from reduced traffic and road danger, and the reduction in noise should help with navigating their local area more easily. It is also important to note that there are</p>



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	<p>no plans to include any new “shared space” areas. Pavement space will be maintained for people walking or wheeling. The quieter and calmer streets should also make the streets more welcoming to people with cognitive disabilities.</p> <p>Exemptions from camera enforced traffic filters in their ‘home’ LTN for Blue Badge holders who live in, or on the inner boundary roadside of a low traffic neighbourhood were introduced on a rolling basis across all LTNs from December 2021. This meant that when the St Mary’s Church scheme went live in February 2022, eligible Blue Badge holders were automatically exempt. Nearly 1,000 Blue Badge holders across the borough are currently benefitting from this exemption including 72 in or on the boundary roads of the St Mary’s Church LTN.</p> <p>Following further feedback from residents including groups representing disabled individuals, in January 2023, the council introduced an ‘Individual Exemption’ permit for people who have no other option than using a car and who are severely affected by longer journeys or re-routing of trips. This permit allows a single motor vehicle (either the permit holder’s or someone else’s) to pass through camera-enforced traffic filters in all of Islington’s people-friendly streets LTNs (and future liveable neighbourhoods). Applicants do not need to have a Blue Badge or live in a people-friendly streets neighbourhood.</p>
<p>Scheme is poorly thought out/arbitrary/not evidence based</p>	<p>In May 2020, the Government announced a new £250m Emergency Active Travel Fund for local authorities. The purpose of this fund was to prevent a car-focused recovery from the COVID-19 pandemic by temporarily reallocating road space to walkers and cyclists. The idea was to assess these schemes with a view to making them permanent. More than 50 councils have now introduced over 200 LTNs, over half of which are in and around London. In 2019, under the “liveable neighbourhoods” banner, the council committed to improve all residential areas in Islington to create a healthy, more equal, accessible and enjoyable environment, and to enable local people to walk and cycle safely. We set this out in our draft Islington Transport Strategy; our Air Quality Strategy; and our Net Zero Carbon Strategy, Vision 2030. Other examples include our ambitious School Streets programme, installing new electric vehicle charging points and electrifying the council’s vehicle fleet.</p> <p>The COVID-19 health emergency and subsequent changes to work and travel patterns had a major impact on the way we use</p>

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	<p>our streets. During the first national lockdown in March and April 2020, Transport for London (TfL) predicted that, without action, traffic volumes would get much worse than before the crisis. That is why we acted quickly to create more space for local people to walk, cycle, use buggies and wheelchairs, as safe alternatives to using public transport. Private car use across London increased as lockdown eased, causing congestion, increased road danger, poorer air quality and other negative impacts on health. This is happening in all boroughs, whether or not they have implemented LTNs. In common with other London boroughs, we must follow statutory government guidance which states that we need to take steps to encourage more walking and cycling and to enable social distancing.</p> <p>Against this backdrop, the commitment to deliver the St Mary's Church LTN, and to take a similar approach to implementation as with the previous six LTNs, was subsequently reinforced in the October 2021 PFS Executive paper, which approved the continuation of the PFS programme. The design chosen for the St Mary's Church LTN provides the optimal solution for removing through traffic from the area, as it cuts off most through-routes using only four traffic filters and includes several loops that allow vehicles to exit sub-areas of the LTN without the need to reverse and minimising the need to make U-turns.</p> <p>The implementation of the LTN in St Mary's Church on a permanent basis supports the council's objective of achieving net zero carbon emissions in Islington by 2030. It will also contribute to the delivery of a Fairer Islington by making it easier and safer for people to travel on foot, by bicycle and public transport; supporting people to live healthier lives; supporting local shops, markets and businesses; and enabling residents to remain socially active and connected to their community.</p> <p>The people-friendly streets programme contributes to the council's long-term plan to transform the borough and progress against wider council ambitions related to public health, road danger reduction, clean air and addressing climate change.</p> <p>The 2023 Executive Report reaffirms the commitment to the people-friendly streets programme, including setting out a plan to upgrading existing LTNs, subject to a decision on making the schemes permanent, into liveable neighbourhoods through a programme of investment into the streets in each area.</p>

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	<p>These wider improvements may include: footway improvements (and wider interventions falling under people-friendly pavements programme), greening and placemaking projects.</p>
<p>Scheme is negatively impacting mental health/well being</p>	<p>Prior to implementation of each low-traffic neighbourhood scheme, an Equalities Impact Assessment (EqIA) is carried out which aims to assess the impact of the scheme on residents who have protected characteristics (which includes people with disabilities). The EqIA for St Mary's Church outlines the potential positive and negative impacts on these cohorts.</p> <p>On the positive side, this included the potential for reduction of noise levels to aid those with cognitive disabilities (and may deliver wellbeing benefits to the general population). 41% of all survey respondents agreed with the statement that there is less noise from motor traffic in the area since the trial began (30% disagree).</p> <p>It is difficult to quantify the levels of increase of anxiety, stress and depression (and effects on wider mental health) and ascribe them purely to the impacts of the LTN. As the implementation of the LTN occurred during the COVID-19 pandemic (with many national restrictions still in place in February 2022), it would be difficult to separate the effects of one from the other.</p> <p>A consultation questionnaire was available between 29 March and 26 April 2023. The results from the consultation survey (301 respondents) showed that 42% of respondents agreed that since the trial began, the streets in St Mary's Church look nicer (25% disagree), 26% said they socialise more with neighbours (15% disagree) and 29% do more physical activity outdoors (13% disagree). 27% of all respondents said they are more likely to walk or cycle for short journeys instead of driving (14% disagree). All these indicators suggest positive impacts on well-being for those who live in or near the St Mary's Church LTN.</p>
<p>Residents should be granted ANPR exemptions/parking permit holder exemptions</p>	<p>There are no exemptions for individuals beyond:</p> <ul style="list-style-type: none"> <li>• Blue Badge holders who live in, or on the inner boundary road of an LTN and,</li> <li>• people who qualify/whose children qualify for an Individual Exemption permit.</li> </ul>

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	<p>The scheme has been designed so all residents can access their homes without the need for an exemption. In all people-friendly streets neighbourhoods across Islington, all residents are able to drive to and from their homes and access all shops and services in their area by car. The only thing that may change, in some circumstances, is the route they have to take.</p> <p>1/3 of journeys made in London are under 2km and a further third are between 2-5km. Many trips that are currently made by car could be made by walking, cycling and public transport</p> <p>If private vehicles in the St Mary's Church area are still able to travel through the restrictions, then we will not see the benefits in terms of improved road safety, air quality and noise pollution that could otherwise be expected. This is because road danger from traffic is one of the largest barriers preventing people from walking, cycling or using wheelchairs.</p> <p>By maximising prevention of motor vehicle trips through camera-controlled filters (except for people who qualify for current exemptions, emergency vehicles and some council service vehicles) we will make the environment feel much safer and make it much more likely that local people will begin to travel more by active means, leaving roads clearer for those who have no choice but to drive.</p> <p>The council has given due consideration to expanding exemptions to people beyond Blue Badge holders and Individual Exemption permit holders (for example people who live within the St Mary's Church area) but for the above reasons has taken a view not to expand the exemptions.</p>
<p>LTNs are not delivering the benefits envisaged</p>	<p>The pre-consultation (~12 month) monitoring report shows that the St Mary's Church people-friendly streets trial is generally having the intended impacts of reducing motorised traffic overall across internal roads and boundary roads and reducing both the percentage of vehicles speeding and average vehicle speeds. There has been no change in crime and antisocial behaviour patterns, or London Fire Brigade response times in the area. Air quality results are largely in line with borough trends.</p> <p>By reducing the negative impacts of traffic, the LTN is achieving its desired objectives of reducing road danger,</p>

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	<p>improving accessibility and making it easier to walk, wheel and cycle in the borough.</p> <p>The trial is also showing evidence of behavioural change, with 35% of respondents to the consultation survey stating that they are more likely to walk or cycle to local shops or businesses since the trial began (compared to 15% who said they are less likely).</p> <p>Cycling volumes have decreased across the scheme area (15% internal roads and 2% on boundary roads), however cycling volumes have likely been impacted by colder weather during the pre-consultation counts.</p>